

**From:** [Peter G. Sherman](#)  
**To:** [TaxCreditQuestions](#)  
**Cc:** [Aris Ferguson](#)  
**Subject:** [External] 2023 draft QAP  
**Date:** Wednesday, August 17, 2022 3:20:39 PM

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I have reviewed the 2023 QAP and am making the following requests on behalf of the Housing Authority of the City of Charleston.

III. Threshold Participation, G Required Development Experience (page 7)

An exception should be made for public housing authorities and the experience requirement should remain at two (2) for LIHTC projects in SC. The developer fees public housing authorities earn can be reinvested in more additional affordable housing projects and an increase to four (4) would put more of those fees in the hands of outside consultants and developers.

Appendix C1 – 9% LIHTC, I. B. Award Limitations.2 (page 18)

The Authority should make an exception for public housing authorities and allow two construction awards per county if one of the awards in the county is to a public housing authority project.

Appendix C2 – Tax – Exempt Bonds, II.B.5 Size Requirements (page 32)

“The minimum number of units per application is seventy (70)” – This number should be reduced to sixty (60) and an exception should be allowed for Housing Authorities. A Housing Authority’s ability to utilize tax credits and tax exempt bonds for a RAD conversion or Section 18 is not only dependent upon the rules stipulated by SC Housing but also the rules stipulated by HUD. A portfolio award as defined by SC Housing may conflict with the rules for individual projects listed for HUD.

Appendix C2 – Tax – Exempt Bonds, III Rankings (page 33) and Appendix C3 – Tax – State LIHTC III Rankings (page 35 -36)

Public Housing Authorities should get a higher ranking based on the simple fact that they were created by state charter for the benefit of the citizens of SC to create and manage affordable housing. A 30% adjustment to state resources should be also be made for “public housing projects that are being renovated or redeveloped through HUD’s RAD program or HUD’s Section 18.”

We are asking for these revision as housing authorities are in a unique position where we can combine resources with HUD and utilize our extensive property ownership to develop more affordable housing across the State, and not be in competition with other private developers.

Thank you for your consideration,

**Peter G. Sherman**  
Director of Development  
Housing Authority of the City of Charleston  
550 Meeting Street

Charleston, SC 29403



[pgs@chacity.org](mailto:pgs@chacity.org)



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