

**Connelly Builders, Inc.**  
**125 Old Chapin Road**  
**Lexington, SC 29072**

Sara Martinez, Director of Development  
SC State Housing Finance and Development Authority  
300-C Outlet Pointe Blvd  
Columbia, SC 29210

RE: Comments on the Final Draft 2020 Qualified Allocation Plan (QAP)

Dear Ms. Martinez:

Please accept the following comments on the Final Draft 2020 QAP:

- Accessibility Consultant – Architects & Engineers are already responsible for meeting the latest ADA requirements so adding another level of oversight for ADA creates additional cost and time delays. The Authority should allow project architects and engineers to serve as the Accessibility Consultant.
- FFE to be elevated a minimum of 84” above finished grade. This is beyond excessive and appears to be a typo. Code requirement is 8” above finished grade, the Authority should use the established Code requirement for FFE.
- Water meters are required for each unit. More and more municipalities are only allowing one master meter to the property. To require separate meters results in the Property having to engage a 3<sup>rd</sup> Party Vendor to manage and bill for the water costs. The Property can’t pass this administrative cost to the residents so the Property ends up burdened with this additional cost. The Authority needs to remove the requirement for individual meters if the municipality requires the Property to have a master meter.
- Exercise rooms for family developments are problematic. Past experience is that tenants tear up and abuse the equipment in family developments. The Authority is now requiring this as a mandatory amenity and accessible at all times. We request that the Authority remove this requirement from family developments as it will add costs for continued replacement throughout the compliance period.
- The Authority reduced the requirement from an 18” to 12” thick concrete approach to dumpster pad; however, this is still considered excessive. The Authority should require that the developer follow the geotechnical report which stipulates the envelope for heavy duty concrete paving.
- The Authority has outlined roofing standards that are commercial and not residential and is requiring post construction 30-year warranty confirmation by manufacturers. The Authority should continue to allow 30-year architectural anti-fungal shingles and continue with the standard 30-year manufacture warranty.
- The Authority is requiring “Powder Coated Galvanized Steel” as an option for hand rails and public use stairway components. This is expensive and doesn’t make sense. In conversations with suppliers it was stated that the wording should be changed to “Galvanized OR Powder Coated Steel”. We request that this verbiage be changed by adding OR to these two requirements.
- The Authority is requiring that solid core interior doors be installed at bathrooms and bedrooms. This is an expensive requirement and will add additional costs to the development. We request that the Authority reconsider this requirement so that costs are not unnecessarily increased.

- The Authority is requiring the installation of vinyl windows with a 30-year warranty. We request that the Authority continue to allow developers to use Energy Star rated vinyl windows and provide the manufacture data sheets.
- Requiring glass doors to have blinds between the glass more than doubles the cost of the door. We request that the Authority remove this requirement and allow exterior window/door coverings on glass doors.
- Clarification made in one place that side by side ADA refrigerators only in Type A units but J. 13. Still requires them in all accessible units. This would greatly increase the cost per unit as these refrigerators add \$830 per unit over the standard 18 cu. ft. ADA refrigerator. The Authority needs to amend J.13. to say Type A instead of accessible.
- The Authority has added the requirement that exterior closets be installed. This is an additional expense to the development and limits the design flexibility. We request that this requirement be eliminated.
- The Authority is requiring that new construction use Multi Family High Rise Energy Star Certification. In trying to determine what this requirement is we searched Google and found the following: *“Until recently, **multifamily new construction projects** achieved certification through either the ENERGY STAR Certified Homes program or the ENERGY STAR Multifamily High Rise program. In 2019, EPA launched the ENERGY STAR Multifamily New Construction program, which serves all multifamily buildings”*. Further clarification should be provided as to what program the Authority is requiring as the one listed in the Final Draft QAP appears to have been changed by the EPA. In addition, Energy Star Certification Programs requires the development to incur additional expenses in order to meet the certification requirements which in turn increases the total development costs. We request that the Authority not require developments to meet a certification program that will increase the overall developments cost.

We appreciate your consideration of our comments and suggestions to the 2020 Final Draft QAP. Should you have any questions please let us know.

Sincerely,

T. Kevin Connelly  
President of Connelly Builders, Inc.