



WODA COOPER COMPANIES

September 15th, 2021

Kim Wilbourne
LIHTC Manager
South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Blvd.
Columbia, SC 29210

RE: 2022 Draft QAP Comments

Dear Ms. Wilbourne:

On behalf of Woda Cooper Companies, Inc., thank you for allowing us the opportunity to provide constructive feedback regarding the 2022 QAP.

1. II Administration of the Qualified Allocation Plan – E LIHTC Award Limitations

We support SC Housing's decision to limit the number of awards per county targeting older persons to one award. By limiting the awards per county targeting older person to one SC Housing will help increase the supply of new construction multifamily housing and we commend the authority on including this in the QAP.

2. IV. Application Groupings and Set – Asides – 4. Innovation

We respectfully disagree with SC Housing's proposal of this section. In our experience in other states the innovative development set-aside become too subjective with ambiguous definitions for innovative. Because the developers are not sure whether their designs will even qualify many decide to not pursue this section. We recommend not including this section in the QAP.

3. V. Threshold Participation Criteria – 1. Market Study

We would like to propose maintaining the current procedure whereby the developer can order and submit the market study from a list of qualified market analysts issued by SC Housing. This ensures that only analysts who meet SC Housing's standards are used, but also allows for the developer to solicit immediate feedback on their developments while not incurring expenses for multiple studies.

4. V. Threshold Participation Criteria – City/County/Legislative Notification

We commend the Housing Authorities decision to create a form for all legislative notifications and delivering the notification letters for all applicants. This will allow applicants to have consistent and uniform letters to all applicable officials. We support SC Housing’s decision to provide a form notification letters and deliver for applicants.

5. VI. New Construction Scoring Criteria – H. Revitalization or Local Policies

We recommend that SC Housing uses less specific criteria in order to meet the minimum requirements of the CCRP points. There are 2 issues that stand out as roadblocks to some CCRPs that meet the intent of a CCRP from qualifying.

The first is that a plan for a large jurisdiction (such as a city or county) that does not designate particular areas of that jurisdiction for targeted investment will not qualify. While this is good policy for applicants in large cities such as Columbia or Charleston, the same cannot be said for smaller cities and townships. Many small cities or townships that have CCRPs will not designate particular areas of the jurisdiction for certain investment, meanwhile the jurisdiction itself likely has a smaller population and smaller size than a neighborhood in Columbia that would be considered a targeted investment. We recommend allowing a plan for a jurisdiction without designation of particular areas if the jurisdiction falls below a certain population threshold determined by SC Housing.

The second roadblock for a CCRP is that the plan must detail the sources and magnitude of committed resources. Many CCRPs will fail to address the sources and magnitude of committed resources as they set the foundation for sources to be created and designated at a later date. Additionally, not all jurisdictions, especially smaller jurisdictions or smaller targeted areas, create the CCRPs with the intent to commit resources towards investment. Many CCRPs are intended to pave the way for developers to carry out the city’s investment plans without a pre-planned source to commit to allow this investment. We suggest removing this requirement as a minimum requirement to being considered a CCRP.



6. Timeline – Tax Exempt Bond Program

We respectfully request that SC Housing establish the year's timeline for tax-exempt bond volume application rounds in the 2022 QAP. This will allow developers to better prepare pipelines than is possible under the current system where rounds occur on an inconsistent basis. Knowing when applications will be due in advance facilitates timeline negotiations with land sellers, which will ultimately lead to better sites for the program.

7. Scoring Criteria – Tax Exempt Bond Program

An additional measure which would enable superior sites to be found for the tax-exempt bond program would be to publish selection criteria in the QAP similar to what is done for the 9% program. Even if SC Housing is unable to establish a timeline for the bond round(s), knowing the scoring criteria further in advance provides developers additional time to secure the most viable, cost-effective sites as well as local resources which meet SC Housing's priorities. Knowing SC Housing's priorities in advance will prove to be beneficial to the state housing agency, the developers, and eventually the tenants. We respectfully request that even if SC Housing is unable to release a timeline for the Bond Program that they still publish the scoring criteria.

Thank you again for this opportunity to provide feedback and we look forward to working together further with the Authority to bring high quality affordable housing to the great people of South Carolina.

Sincerely,



Denis Blackburne
Senior Vice President of Development