

Wilbourne, Kim 6-9083

From: Joe Eddy [REDACTED]
Sent: Thursday, August 24, 2023 4:36 PM
To: TaxCreditQuestions
Subject: RE: [External] 2024 Draft QAP Comments & Questions

To whom it may concern –

We have the following questions and comments on the 2024 draft QAP:

1. The draft design standard should allow design waivers that are particular to urban downtown buildings. This may already be the case but items such as minimums (3b) for unit size, bedroom size, living room size, laundry room size as well as the need for a pantry and interior side hinged doors are very good standards for suburban and rural apartments. However, the luxury apartments being built in downtown Greenville and Charleston wouldn't meet those requirements as urban requirements and design is now for smaller units and design features such as barn and pocket doors. This also extends to the design standards require onsite parking (6d) and a drive thru (2e) for older person projects. A drive thru is extraordinary difficult if not impossible at a downtown site and should be waived. While parking requirements are denoted as being able to be waived, it is unclear if it also applies to the requirement to have onsite parking and the drive through. Having an agreement with the city or adjacent sites should be allowed for urban sites that comply with local zoning.
2. The draft design standard for signs (6e) may need a waiver for historic and downtown buildings.
3. On phased projects, a waiver for an onsite property management office may be necessary.
4. The Draft QAP states there is no development fee on acquisition costs. Is that applicable to 4% deals with no other SC Housing funding? If so, it dissuades owners and developers from improving existing properties in the state. We believe that creating an incentive to retain and improve existing affordable housing would be good public policy.
5. Draft Appendix C1 gives points for a big box store, shopping plaza or mall within a certain radius of the property. Big box retailers, shopping plazas and malls are essentially a recreation of downtown retail under a single roof that is found in the suburbs and rural areas. We believe this provision should also apply to having small retailers that provide clothing, housewares, cleaning products, medicine, and personal hygiene. If a site is in a downtown area that has 5 retailers within a certain radius that provides these types of items it should also count in the same manner as having one big box store.

Thanks for your consideration.

Joe

Joseph Eddy
President
JE Properties
150 Mount Vernon Street
Boston, MA 02125
[REDACTED]

www.jeproperties.com

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