

**Harmon, Amy 6-8713**

---

**From:** Nicholson, Laura 6-9190  
**Sent:** Tuesday, September 25, 2018 9:29 AM  
**To:** Harmon, Amy 6-8713  
**Subject:** SC QAP  
**Attachments:** Affordable Housing Tax - QAP Letter 9.25.18.pdf

Please have the attached posted to the 2019 tax credit webpage for QAP Comments. Thanks.



**Laura Nicholson, Development Director**  
300-C Outlet Pointe Blvd. | Columbia, SC 29210  
Phone: 803.896.9190 | Fax: 803.551-4925  
[Laura.nicholson@schousing.com](mailto:Laura.nicholson@schousing.com)  
[www.SCHousing.com](http://www.SCHousing.com)

---

**From:** Gibbons, Claire [<mailto:cgibbons@crda.org>]  
**Sent:** Tuesday, September 25, 2018 9:26 AM  
**To:** Nicholson, Laura 6-9190  
**Cc:** Ginn, David; [sam.skardon@oneregionstrategy.com](mailto:sam.skardon@oneregionstrategy.com); 'Mr. Robert Pratt'; Warner, Steve  
**Subject:** Letter of support for changing SC QAP

Dear Ms. Nicholson:

As the lead economic development organization for the three-county Charleston region, the Charleston Regional Development Alliance is joining with other local partners to encourage the SC Housing Finance and Development Authority to update our state's Qualified Allocation Plan to ensure Low Income Housing Tax Credits are more equitably awarded. On behalf of CRDA's leadership and staff, please find our attached letter of support for change.

Kind regards,

Claire Gibbons

--

**Claire A. Gibbons**  
*Director of Global Marketing & Communications*  
Charleston Regional Development Alliance  
843.760.3351 | mobile: 843.697.9774  
[cgibbons@crda.org](mailto:cgibbons@crda.org)  
[charlestoneconomicdevelopment.com](http://charlestoneconomicdevelopment.com)  
[charlestonregionaldata.com](http://charlestonregionaldata.com)  
[twitter](#) | [facebook](#) | [blog](#) | [linkedin](#)

---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.



**CHARLESTON REGIONAL DEVELOPMENT ALLIANCE**  
Berkeley, Charleston & Dorchester Counties

September 25, 2018

SC Housing Finance & Development Authority  
300-C Outlet Pointe Boulevard  
Columbia, SC 29210

**RE: Support for updating South Carolina's Qualified Allocation Plan (QAP)**

To the South Carolina Housing Finance & Development Authority:

Thank you for your commitment to investing in our state's affordable housing needs. As president and CEO of the Charleston Regional Development Alliance (CRDA), the three-county Charleston metro's lead economic development organization, I am writing to express my strong support for updating South Carolina's Qualified Allocation Plan (QAP) so that all SC communities have a more equitable opportunity to qualify for Low Income Housing Tax Credits.

As one of the fastest-growing metros in the nation, Charleston is experiencing significant affordable housing, traffic, and mobility challenges. Our population growth is three times that of the U.S. and is expected to reach 1 million within 10 years. Metro Charleston is responsible for 21% of all jobs created in South Carolina from 2013 – 2017. While this has benefited the community in many ways, significant strains have been placed on the region's housing supply and transportation infrastructure. Average rental prices have increased at four times the rate of wage growth, and many employment centers are not co-located with housing. Offering affordable housing options in proximity to jobs, health care, and other critical destinations is imperative to our economic competitiveness.

The CRDA is a public/private, non-profit serving as a catalyst for long-term, sustainable regional prosperity in Berkeley, Charleston and Dorchester counties in South Carolina. With a strong economy and tremendous momentum, it's essential to address the challenges that come with fast-paced job creation and ensure they do not derail future economic growth. To that end, we launched the One Region Global Competitiveness strategy in 2016. Attainable opportunities for all residents to live, learn, and earn is a foundational value of the strategy, and it includes adopting smart policies and practices that ensure having a home is attainable for all.

We are urgently seeking solutions to make financing possible for more affordable housing developments in the Charleston region. Low Income Housing Tax Credits (LIHTC) present an excellent opportunity, if several changes are made to South Carolina's Qualified Allocation Plan (QAP) to make applications from our region more practical and competitive.

1. Given high land costs in rapidly growing and space constrained areas of our state, we request a significant increase, or removal of, current QAP caps on number of units and per unit cost within a development. The current caps are economically impractical for our region, resulting in developers choosing not to apply, and ultimately limiting affordable housing development.

2. Mixed use and mixed income developments produce the healthiest communities with the highest quality of life and are the most economically viable ways to create affordable housing. As such, we request the next QAP include an incentive mechanism for developing this type of community using LIHTC dollars to finance the affordable units within a larger development.
3. Several items in the site characteristics scoring system work against space constrained, geographically dense areas. Proximity requirements from railroad tracks, substations, and bars are particularly challenging for our area while multiple positive attributes – specifically medical facilities and schools with different specializations – should be able to count more than once.
4. We are grateful for the creation of the large-urban set-aside and support its further expansion and enhancement. More dollars in the set-aside would incentivize more applications, as would allowing more municipalities to participate. A mechanism to rotate the municipalities receiving these dollars would ensure a more equitable distribution of LIHTC funds throughout the state.

On behalf of our leadership and staff, thank you in advance for your consideration of these requests. We look forward to further collaboration between SC Housing and the broad coalition of Charleston metro area stakeholders who are committed to addressing our region's housing affordability crisis. If you have any questions, or require additional information, please do not hesitate to contact me.

Sincerely,



David T. Ginn  
President and CEO  
Charleston Regional Development Alliance

cc: Robert Pratt, CRDA Board Chairman