

Humanities Foundation's 2023 QAP Comments

QAP Pg 12 Requiring rehabs to be 20 years old to apply for tax credits or Tax Exempt Bond financing will limit the options for recapitalizing older tax credit properties.

- Our recommendation is to allow applications for rehabs at 15 years.

Appendix C1

Pg 18 One new construction award per county will be detrimental to larger municipalities with greater affordable housing needs.

- Our recommendation is to allow 2 new construction awards per county.

Appendix C2

Pg 33 Ranking applications based on State resources per heated residential square foot will be detrimental to high cost areas in desperate need of affordable housing.

- We recommend adjustments to the ranking criteria that will allow a set aside or adjustment for high cost areas.

Appendix C1

Pg 24

IV. New Construction scoring criteria

- distance to amenities

"All establishments must be open to the general public and operating as of the preliminary application deadline with no announced closing prior to the notification of the final point scores."

- Our recommendation is to make it so that if the amenity, like a grocery store for example, is set to be finished before the property is placed in service it should count for points as it will be there before the tenants move in. This is especially helpful for master developments that plan to have everything the tenants need within walking/driving distance in place but are under construction.

QAP Page 9

J:2E – Disqualification for "Applications for new construction developments located within one (1) mile of a 2020, 2021 or 2022 awarded development."

- This will limit affordable housing in the most needed areas. Our recommendation is to remove this from the QAP.

QAP Page 9,

J: 2D – Disqualification of “Any site that requires the execution of voluntary or involuntary cleanup agreements with Department of Health and Environmental Control or other third-party organizations as noted in a Phase II environmental assessment report (unless fully completed).”

- With limited sites available in high demand areas, this disqualification could be detrimental to the supply of new affordable housing. We recommend these sites be allowed as long as there is evidence the site can be remediated.

Thank you very much for all you do for affordable housing in South Carolina.

Sincerely,

Humanities Foundation