HOUSING AUTHORITY OF THE CITY OF CHARLESTON

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Arthur S. Milligan, Jr. (MBA, CCIM, CPM, PHM)

President & CEO

July 21, 2023

RE:

SC Housing 2024 QAP Comment Experience for HUD Section 18 Projects

Ms. Kim Wilbourne South Carolina State Housing Finance and Development Authority 300 Outlet Pointe Blvd Columbia, SC 29210

Ms. Wilbourne:

It is my understanding that SC Housing is currently receiving comments on the 2024 draft QAP. As such, I would like to submit the following comment for consideration as SC Housing prepares to finalize the 2024 QAP.

Under Appendix C2 - Tax Exempt Bonds, Section II.B.3, SC Housing allows developers proposing projects utilizing the RAD program to request a waiver of the required development experience if the Development Team contracts for the services of a LIHTC consultant who has experience on previous RAD conversions. Another tool by which HUD allows Public Housing Authorities to reposition their Public Housing portfolios is the Section 18 program. This program is similar in execution to the RAD program, and likewise allows PHAs to reposition their properties into more long term financially sustainable situations.

I request that SC Housing inserts an additional provision under Section II.B.3 for developers to request a waiver of the required development experience provisions if their project is taking place under the Section 18 program and a LIHTC consultant with experience operating under the Section 18 program is contracted on the project.

If I can do anything to further clarify this comment, please do not hesitate to reach out.

Sincerely,

Pete Sherman, Director of Development Housing Authority of the City of Charleston

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