



September 20, 2024

Kim Welbourne
SC Housing Finance and Development Authority

Dear Kim,

Thank you for your ongoing efforts to solicit public input and ensure that state policy effectively serves the community, particularly those in need of affordable housing. The SC Housing staff continues to engage meaningfully with stakeholders, and we greatly appreciate your leadership in this important work.

On behalf of the Greenville Housing Fund and the Greenville Affordable Housing Coalition, we would like to share our feedback:

First, we commend the Authority for implementing positive changes to the Qualified Allocation Plan (QAP). Specifically, we are pleased to see the high-demand new construction set-aside increased to 35-40%, the general new construction set-aside decreased to 25-35%, and the inclusion of a set-aside for Public Housing Authorities that do not count against the 1 new construction award limit per county. These adjustments will promote a more fair, competitive application process, and we appreciate your efforts in this regard.

However, we do have a significant concern. We are disappointed by the reduction in the 4% tax-exempt bond project award amount from 2 to 1 per funding cycle to any member of the Development Team. We strongly encourage you to consider allowing at least two projects to be funded per funding cycle to any member of the Development Team, particularly for those that are NOT requesting state credits in conjunction with the 4% bond applications.

We also would like you to take into consideration the rising costs and inflation and the impact it has on operating expenses, especially for maintenance on older rehabbed units. We recommend the annual operating expenses on new construction to increase to \$5,500 per unit per year and add \$4,500-\$6,500 per unit per year on rehabilitation. These modest

increases will help to preserve quality housing for residents, reduce deferred maintenance, and promote quality upkeep of assisted properties over time.

Once again, thank you to the SC Housing team for your partnership and stewardship of these vital federal and state program resources. Together, we can achieve a fair and effective allocation of resources to address the growing demand for affordable housing across South Carolina.

Sincerely,

A handwritten signature in blue ink that reads "Bryan Brown". The signature is written in a cursive, flowing style.

Bryan Brown
President & CEO
Greenville Housing Fund