

July 29, 2024

Richard A. Hutto
South Carolina State Housing Finance & Development Authority
300-C Outlet Point Boulevard
Columbia, South Carolina 29210

RE: Comments on the SC Housing 2025 Draft QAP

Dear Mr. Hutto:

On Behalf of the Columbia Housing Authority and Brinshore Development, L.L.C., we appreciate this opportunity to provide comments on the 2025 SC Housing QAP in line with our joint mission to preserve and improve the conditions of public housing.

Public Housing Repositioning is being used across the country to support Public Housing Authorities in addressing significant deferred maintenance and unsafe living conditions. We would recommend adding scoring criteria to the repositioning of public housing through the RAD and Section 18 HUD programs.

1. The SC Housing 9% scoring criteria prioritizes projects that prevent the loss of government housing resources. HUD public housing repositioning programs align with this goal. The RAD and Section 18 programs allow PHAs to maintain their government funded housing resources. Projects that utilize these subsidies provide high-quality, long-term affordable housing to public housing residents – often serving at risk communities and providing deep income targeting. Please see suggested language below:

5 points for developments which the owner will use a non-SC Housing subsidy.

2. The SC Housing 9% scoring criteria supports projects that maintain long-term affordability, but the criteria only rewards projects that are eligible for a Qualified Contract or have expiring Project-Based Rental Assistance. When using the RAD program, the RAD HAP contract has a 20-year term with a 20 year extension, and, in general, our projects have affordability restrictions on the land that extend beyond that. We would suggest adding criteria that rewards projects that will be able to maintain long-term affordability via long-term project based subsidy. Please see suggested language below:

10 points for developments which the owner will enter into a HAP contract with at a term of at least 20-years on at least 75% of their units.

5 points for developments which the owner will enter into a HAP contract with at least a 20-year term on more than 50% of their units.

3. We recommend adding the following procedure for scoring applications that eligible for the public housing set-aside:
 - a. First, the applicants will be scored in the general rehabilitation or new construction pools.
 - b. Second, if the applications are not selected in those pools, they will be evaluated in the public housing set-aside.

Thank you for taking our comments into consideration. We are excited to continue to work to improve and increase the quality and quantity of affordable housing in South Carolina.

Kind regards,

A handwritten signature in blue ink, appearing to read "David Brint".

David Brint

President, Brint Development, Inc.;

Member, Brinshore Development, L.L.C.