



BRINSHORE

July 10, 2025

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 2026 Draft QAP

Dear Mr. Hutto:

On behalf of Brinshore Development, L.L.C. ("Brinshore") and our partners, we appreciate this opportunity to provide comments on the next SC Housing Qualified Allocation Plan ("QAP") in line with our joint mission to preserve and improve the conditions of affordable housing.

First, the new legislation, H.R.1 - One Big Beautiful Bill Act ("OBBB"), that passed on July 4th, 2025, has given state finance agencies across the country immense influence to effect change in the affordable housing industry. We would recommend the following changes to the next SC Housing QAP, in order to capitalize on this new legislation:

1. With the increased allocation of credits and bond volume the OBBB allows for more development of affordable housing across South Carolina. Spreading out the development will ensure that the market does not become over-saturated and credit pricing does not drop. It is critical that SC Housing award a balance of acquisition/rehabilitation and new construction applications. Please see suggested language below:
 - **HIGH-DEMAND NEW CONSTRUCTION (30-35%) New construction projects located in a Central City/Urban areas.**
 - **REHABILITATION (30-40%) Rehabilitation projects.**
 - **GENERAL NEW CONSTRUCTION (25-30%) New construction projects located in Metro/Suburban areas.**
 - **GENERAL NEW CONSTRUCTION (15-20%) New construction projects located in a Rural areas.**
2. The OBBB increases each state's allocation of 9% credits. We would recommend that SC Housing increase the cap on federal 9% tax credits per application. With the significant need for affordable housing and a demand for more resources, providing additional



credits will help more deals to be financially viable, leverage additional sources, preserve more existing housing, and expand housing options to more parts of the state.

3. With the increase in credits, we also recommend allowing two awards under the public housing set-aside. With the insecurity of funding for public housing, supporting Public Housing Authorities (“PHAs”) with their redevelopment is critical to preserving affordable housing in South Carolina.
4. Additionally, we recommend adding the following procedure for scoring applications that are 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.

Second, outside of the changing legislative landscape, we would recommend the following additions and adjustments to the scoring categories available under the current SC Housing QAP.

5. To better capture different communities of scale and need within the state, we recommend that community amenity points, jobs points, and affordable housing shortage be tied to the geographic group categories. To further create a more even playing field, a third group covering metro/suburban areas is recommended to capture small cities and those communities on the edges of urban cities. This addition will address the variations in community amenities and jobs for each geography but also allow for amenity scores to be weighted by the need for housing in that community size (i.e. cities with larger populations have a greater need for more affordable housing; all rural areas have housing demand, but the need is more disbursed across the state).
 - **Group A: Urban areas**
 - **Group B: Metro/Suburban areas**
 - **Group C: Rural areas**
6. SC Housing provides points for developments with close proximity to community amenities and jobs which can create opportunities and improve quality of life for residents. Access to transportation broadens these opportunities for residents to reach more jobs and services and shopping. SC Housing should incentivize developers to locate properties in close proximity to as many transportation options as possible, so residents have more opportunities. Please see suggested language below:



2 points:

- **Group A sites within 0.5 miles of a fixed transit stop (bus, light rail, or subway) with a regular schedule or 1 mile of a major transit hub.**
- **Group B and C sites within 1 mile of a fixed transit stop (bus, light rail, or subway) with a regular schedule or with on-call transportation for residents.**

4 points:

- **Sites within 0.5 miles of a bus rapid transit or light rail station.**

5 Currently SC Housing incentivizes long term affordability through a waiver of the right to request a qualified contract. We recommend that developers and non-profits that are committed to long-term affordability should benefit with additional points beyond those given with the waiver. Those who incorporate long-term affordability through 35- or 40-year extended use agreements, 20-year HAP contracts with automatic 20-year extensions, and properties with ground leases for 75-years or more should earn extra points. Please see suggested language below:

- **2 points for 35-year extended use agreement;**
- **4 points for 40-year extended use agreement; or for developments which the owner will enter into a HAP contract with at a term of at least 20-years with a 20-year extension on at least 75% of their units.**
- **5 points for 75+ year ground lease with affordability covenants.**

6 The current 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.**

7 The current QAP asserts that funding or financial support that is used for leveraging, “must be from an independent third party not affiliated with any member of the Development Team (the Authority will determine affiliations based on relationships between the parties in previously awarded projects and other common interests).” Brinshore partners with mission-drive and strategic



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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,

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organizations and PHAs that are committed to serving low-income populations and high-risk residents. To support and reward these local partners for their investment in their municipality, we would suggest removing this language and allowing them to receive points for their financial contributions.

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