WODA COOPER COMPANIES

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September 11, 2026
Kim Wilbourne
South Carolina State Housing Finance and Development Authority
Re: 2027 Qualified Allocation Plan – Brownfields Cleanup Credit

Dear Kim:

On behalf of Woda Cooper Companies, thank you for the opportunity to provide comments on the proposed 2027 Qualified Allocation Plan. We respectfully request that SC Housing reconsider the proposed reduction in points for developments utilizing the Brownfields Cleanup Credit and restore the category to five points, consistent with the other credits included in the "Other Credits" section of the QAP.

We believe South Carolina has established a thoughtful and effective policy for encouraging the redevelopment of brownfield properties into affordable housing, and we strongly encourage SC Housing to preserve that incentive.

The current draft awards five points for several other qualifying credits, including the Federal Historic Tax Credit, South Carolina Certified Historic Structure Credit, South Carolina Textiles Rehabilitation Credit, and Abandoned Building Revitalization Credit, while awarding only two points for the Brownfields Cleanup Credit. We believe this reduction understates the significant public benefit and additional challenges associated with brownfield redevelopment.

Brownfield redevelopment accomplishes something uniquely valuable: it turns a community liability into a community asset. These are properties that may otherwise remain vacant, underutilized, or burdened by environmental concerns. Through redevelopment, those same properties can become quality affordable housing, generate new tax revenue, support surrounding investment, and eliminate environmental hazards.

South Carolina's Department of Environmental Services recognizes brownfield redevelopment as both an environmental protection strategy and an economic development tool. The State specifically identifies benefits including returning abandoned properties to the tax rolls, attracting private investment, supporting workforce housing, revitalizing distressed and rural communities, eliminating environmental hazards, and preserving community character.

Affordable housing is particularly well suited to this objective. However, developing housing on a brownfield is substantially more complicated than developing on a conventional site. Developers may face additional environmental investigations, remediation costs, engineering requirements, regulatory coordination, liability considerations, and financial contingencies. These challenges can make otherwise viable affordable housing developments difficult to finance.

The Brownfields Cleanup Credit helps overcome that barrier.

There is also an important land-use consideration. South Carolina's land is a finite resource—we cannot make more of it. As the State continues to grow and the demand for affordable housing increases, policies that encourage the redevelopment of existing, underutilized properties can help accommodate growth without continually consuming undeveloped land.

EPA's research supports this approach. Brownfield redevelopment can reduce the expansion of impervious surfaces by approximately 73–80% and reduce residential vehicle miles associated with new growth by approximately 25–33%, compared with accommodating that growth on previously undeveloped sites. (epa.gov)

This means a successful brownfield affordable housing development can advance several public-policy objectives at the same time:

- Expand affordable housing
- Remediate environmental hazards
- Revitalize underutilized properties
- Preserve undeveloped land
- Leverage existing infrastructure
- Increase property and tax-base productivity
- Stimulate additional private investment

We therefore believe the Brownfields Cleanup Credit should receive the same five-point allocation as the other credits in the “Other Credits” category.

We are not asking SC Housing to create an additional preference for brownfield projects. Rather, we believe restoring the five points simply recognizes the substantial public benefit and additional development challenges associated with these properties and maintains consistency within the QAP's existing scoring structure.A brownfield can be a liability for a community. With the right public policy and development partner, that same property can become safe, quality affordable housing and a long-term community asset.

We respectfully request that SC Housing restore the Brownfields Cleanup Credit to five points in the final 2027 QAP.

Thank you for your consideration and for SC Housing's continued efforts to encourage innovative and responsible affordable housing development throughout South Carolina.

Sincerely,

Tommy Lowmon

Tommy Lowmon
Senior Vice President
Woda Cooper Companies, Inc.