Home Innovation
RESEARCH LABS™

November 6, 2026

South Carolina State Housing Finance & Development Authority
Attn: Kim Wilbourne, Multifamily Director
300 Outlet Pointe Blvd C,
Columbia, SC 29210

Dear Ms. Wilbourne,

On behalf of Home Innovation Research Labs, we are pleased to submit comments regarding SC Housing's Draft 2027 Qualified Allocation Plan (QAP). I write to reiterate the comments from our letter dated September 25, 2026, that requested for SC Housing to restore points for third-party green building certifications in Appendix C1 of the 2027 QAP. Specifically, we requested that NGBS Green Certification be recognized among the certification program options.

While eliminating third-party green building certifications may appear to reduce project costs and improve affordability, it ultimately does the opposite – depriving residents of healthier and more energy-efficient homes while increasing their long-term housing costs. Although green certified homes may cost slightly more to build than code-minimum homes, those modest upfront investments result in lower energy and water bills over the life of the property. By removing third-party green building certifications from the QAP, it shifts a greater share of housing costs to residents through higher monthly utility bills and increased maintenance needs. For true housing affordability, it is important to consider both the cost to develop affordable rental housing and the cost for residents to live in it.

Third-party green building certification programs, like NGBS Green provide an independent process for verifying that affordable housing projects achieve the level of quality and performance expected by the QAP. Accredited verifiers conduct multiple on-site inspections throughout construction, confirm compliance with the certification program requirements and identify deficiencies before they become long-term problems for building owners and residents. This independent oversight complements, not replaces, the work performed by local building officials. It ensures affordable housing delivers healthy, durable, energy-efficient homes that remain affordable to occupy throughout their service life.

Thank you for the opportunity to provide feedback. We request that SC Housing add incentives for third-party green building certifications back into Appendix C1 of the 2027 QAP. I am happy to meet with you, or your staff should you require a more detailed overview of the NGBS or our certification program. We look forward to working with you to promote green certified affordable housing in South Carolina.

Sincerely,

Michael Luzier
President & CEO

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