WODA COOPER COMPANIES

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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 SC Housing's continued work on the 2027 Qualified Allocation Plan and for considering our previous comments.

We respectfully renew our request that SC Housing restore the Brownfields Cleanup Credit from two points to five points within the "Other Credits" category. We believe this request is supported by two important considerations: the responsible use of South Carolina's limited land resources and the financial challenges associated with redeveloping environmentally impacted properties.

1. Land Is One of South Carolina's Most Valuable and Irreplaceable Resources

South Carolina continues to grow, increasing demand for affordable housing and placing greater pressure on available land. While we can build more housing and infrastructure, we cannot create more land.

Throughout South Carolina, former industrial sites, textile facilities, and other underutilized properties remain vacant or unproductive, often because of environmental concerns. Many of these properties are located within established communities where roads, utilities, and public infrastructure already exist.

Redeveloping these properties into affordable housing allows communities to reclaim valuable land, utilize existing infrastructure, eliminate environmental hazards, and encourage additional private investment.

Just as importantly, brownfield redevelopment can help limit unnecessary sprawl by directing new housing toward previously developed land rather than continually expanding onto undeveloped property**.** This reduces pressure on agricultural and natural lands and can help communities avoid the additional infrastructure costs associated with outward growth.
We believe SC Housing's QAP should encourage not only the production of affordable housing, but also the responsible use of the land on which that housing is built.

Every acre of previously developed land that can be safely returned to productive use is an acre of undeveloped land we may not need to consume. South Carolina is the fastest growing state in the country by percentage of population. Managing growth is important to many cities and counties, but these are also the areas with the greatest need for more affordable housing. Encouraging in-fill brownfield redevelopments will help these localities to create affordable housing and manage growth.

2. Brownfield Redevelopment Faces the Same Financial Risks and Uncertainties as Other Rehabilitation Projects

The proposed QAP awards five points for historic rehabilitation, textile rehabilitation, and abandoned building revitalization credits. We support these incentives and believe brownfield redevelopment deserves equal consideration because it presents many of the same financial challenges and public benefits.

In each case, the true costs are often not fully known until investigation, excavation, demolition, or rehabilitation begins. Unexpected structural deficiencies, environmental contamination, and other unforeseen conditions can significantly increase costs beyond initial estimates.

Frequently, these additional costs exceed the financial benefits provided by the associated tax credits, leaving developers to absorb expenses that do not generate additional rental income. This is particularly challenging for affordable housing developments operating under restricted rents.
South Carolina has already recognized the financial burden of environmental remediation through S.C. Code § 12-6-3550, which provides a state income tax credit equal to 50% of qualifying cleanup expenses, subject to applicable limitations.

For example, $100,000 in qualifying environmental cleanup costs could generate a $50,000 basic credit, leaving $50,000 in remediation expenses even if the credit is fully utilized. These costs are necessary to make previously developed land safe and suitable for new housing, often in established communities where roads, utilities, and other public infrastructure are already in place.

The underlying public-policy purpose of all these credits is similar: encouraging developers to accept additional costs and uncertainties to return difficult, underutilized properties to productive use.

If the financial risks and community benefits associated with historic, textile, and abandoned building rehabilitation justify five points, we believe brownfield redevelopment deserves the same consideration.

Our Request

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

This would recognize the additional costs and uncertainties of environmental remediation while reinforcing an important public-policy objective: encouraging the reuse of previously developed land, limiting unnecessary sprawl, and preserving South Carolina's finite land resources.

We are not asking for preferential treatment, but rather equal recognition of the financial challenges and substantial public benefits associated with brownfield redevelopment.
South Carolina cannot create more land. It can, however, create more opportunities to use the land it already has.

Thank you for your consideration and for SC Housing's continued commitment to expanding quality affordable housing throughout South Carolina.
Sincerely,



Tommy Lowmon
Senior Vice President
Woda Cooper Companies, Inc.