

## SC Housing

### Public Comments and Responses 2026 Con Plan for the HOME Investment Partnerships Program (HOME) and the Housing Trust Fund Program (HTF)

#### 2026 Small Rental Development Program (SRDP) Public Comment Period 1/18/2026 - 2/19/2026

##### **Comment 1:**

We recommend changing the word elderly throughout the plan to older adult. The word elderly implies frailty or significant health issues, and the word older adult is considered respectful language.

##### **Response:**

SC Housing appreciates your comment; however, SC Housing uses HUD's definition of elderly since two of the programs funding sources are allocated from HUD. (HOME and NHTF)

##### **Comment 2:**

Negative Site Characteristics – Item 3(a) We recommend removing the term “other eyesore” from the list of negative site characteristics. The term is subjective and undefined, which introduces inconsistency and uncertainty into the scoring process. Scoring criteria should rely on clearly defined, objective, and measurable conditions to ensure consistent application across projects.

##### **Response:**

SC Housing agrees and has removed the term “eyesore”.

##### **Comment 3:**

Negative Site Characteristics – Industrial and Employment Areas We encourage SC Housing to recognize that many locations identified under negative site characteristics are also significant employment centers that provide stable jobs and income for future residents of affordable housing developments. While we understand and support the need to account for environmental and safety concerns, the scoring framework should better balance these considerations with proximity to employment opportunities, which directly supports housing stability and program goals.

##### **Response:**

SC Housing has added more descriptive language to define industrial sites. It is understood that these sites provide jobs; however, large scale industrial/manufacturing sites have the potential to cause issues related to noise and other environmental factors that may disqualify sites from Federal funding.

**Comment 4:**

Negative Site Characteristics – Cap on Negative Points We recommend establishing a maximum cap of ten total negative points for site characteristics. The cumulative impact of multiple negative site factors can outweigh the demonstrated need for affordable housing in areas that are otherwise well located, particularly near major job centers. A reasonable cap would better balance site concerns with the program’s mission to increase access to affordable housing where people live and work.

**Response:**

SC Housing will not be placing a cap on negative points for site characteristics. This is due to sites within close proximity to negative characteristics having the potential to cause environmental issues along with health and safety concerns for residents.

**Comment 5:**

Distance to Amenities We recommend revising the distance thresholds from “less than” one, 1.5, two, and three miles to “less than or equal to” one, 1.5, two, and three miles. This small clarification would eliminate unnecessary ambiguity and ensure consistent scoring for projects located exactly at the stated distance thresholds.

**Response:**

The distances to amenities are measured as less than 1 miles, 1.5 miles, 2 miles, and 3 miles. There is no ambiguity. For example, if an amenity is 1 mile away it will receive 6 points, if an amenity is 0.99 miles away it will receive 8 points.

**Comment 6:**

Affordable Housing Shortage We recommend revising this scoring category to align more closely with the 2025 SRDP Manual, which awarded points based on the absence of recent SRDP awards in a county over the past three and five years. The presence or absence of a recent award is not an accurate proxy for affordable housing need. While we support the intent of measuring housing shortages, we recommend either returning to the 2025 scoring methodology for 2026 and in future cycles, basing this category on objective housing need indicators such as cost burden, vacancy rates, or documented housing deficits at the county level.

**Response:**

SC Housing revised how the score is calculated, so that applicants can only receive points for developments located in a county that did not receive an award in the past 5 years or 3 years. In 2025 applicants were able to receive points in both categories, which was not what was intended.

**Comment 7:**

Site and Neighborhood Standards, we recommend removing the Site and Neighborhood Standards scoring section in its entirety. These standards are no longer a primary federal focus for HOME and related housing programs, and retaining them as a scoring factor adds complexity without clearly advancing program outcomes or affordability objectives. It is a double standard to leave this race related scoring in the application when all other race and minority related language have recently been removed from various programs by SC Housing.

**Response:**

SC Housing will not be revising the scoring requirements for site and neighborhood standards. These standards are regulatory requirements that are still in effect, per 24 CFR part 92.202.

**Comment 8:**

**Expand Beyond Shelter and Rapid Rehousing to Address Root Causes**

While shelter services, prevention, and rapid rehousing are essential, the report reveals that only 26.9% of participants exited to permanent housing. Additionally, 37.1% experienced homelessness for 12+ months, indicating that current interventions may not be sufficient for long-term housing stability. Recommendation: The Plan should explicitly include strategies to address the underlying housing affordability crisis. With the average renter needing to earn \$25.91/hour (vs. actual average of \$17.76/hour) to afford a two-bedroom unit, and 48.6% of homeless adults reporting no income, homelessness prevention and rapid rehousing alone cannot succeed without:

- Expanded permanent supportive housing for chronically homeless individuals
- Housing subsidies that bridge the affordability gap
- Employment and income support services integrated with housing interventions

**Response:**

Aside from the Small Rental Development Program which is funded with HOME, NHTF, and SCHTF, SC Housing also provides funding opportunities through the South Carolina Housing Trust Funds- Supportive Housing program. In addition, supportive housing is incentivized in the Small Rental Development Program by awarding points to development that set aside a minimum of 20% of the units for permanent supportive housing.

**Comment 9:**

Address the Alarming Increase in Chronic Homelessness

The report shows a 177% increase in chronic homelessness from 2023 to 2024 (346 to 959 individuals). This population requires intensive, long-term support beyond rapid rehousing.

Recommendation: Dedicate specific ESG and HTF resources to permanent supportive housing models with wraparound services for individuals with disabilities and chronic homelessness patterns, rather than focusing primarily on short-term interventions.

**Response:** Please see response to comment 8.

**Comment 10:**

Accountability for past program performance prior to issuing new awards each year.

**Response:**

Past program performance data is captured annually in the Consolidated Annual Performance Evaluation Report (CAPER).