



FOUNDERS

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South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Boulevard
Columbia, SC 29210

RE: 2024 Qualified Allocation Plan comments

Dear Kim Wilbourne,

On behalf of the [U.S. Green Building Council \(USGBC\)](#) and our community in South Carolina, we are pleased to provide our comments regarding the 2024 draft QAP.

USGBC is a non-profit organization committed to transforming the way all buildings and communities are designed, built, and operated to support a sustainable, resilient, and prosperous environment that improves the quality of life for all. Our flagship green building system, [Leadership in Energy & Environmental Design \(LEED\)](#), is a nationally recognized standard that takes a holistic view to whole-building performance that includes materials, resource efficiency, location and transportation, and more. In South Carolina alone, there are over 300 LEED-certified buildings, totaling more than 40 million square feet of real estate.

USGBC Recommendations

USGBC commends SC Housing for including 5 competitive points for 9% projects that earn a sustainable building certification, such as LEED. Achieving these certifications means that a building is built above the minimum energy, health, and safety requirements found in the state's building code, creating healthier and more efficient spaces. Residents of affordable housing benefit from third-party building standards through energy and water savings – addressing one of the perpetual barriers to affordability – as well as better indoor environmental quality and improved occupant comfort. Fundamentally, third-party certification holds building developers, owners, and operators accountable to achieving desired building performance outcomes.

USGBC believes that all residents of South Carolina's affordable housing projects should reap the benefits associated with high-performance, sustainable buildings. Moreover, the benefits associated with third-party

certification often align with related state goals, such as improved public health and increased climate and disaster resilience. **To that end, USGBC respectfully suggests that the draft QAP be amended to require that projects earn a sustainable building certification.**

While we acknowledge that SC Housing, like many state housing finance agencies, wants to minimize up-front development costs associated with low-income housing credits, the cost savings often associated with projects that achieve third-party certification means quick payback periods. Consider a [study](#) that found that third-party certified building renovations in affordable housing projects in Washington, DC were associated with substantial energy and water cost savings, at 16% and 54%, respectively.

USGBC has curated resources, such as this [QAP advocacy brief](#), to help state housing agencies understand the benefits of certifying affordable housing to high-performance building standards. USGBC is also available to assist SC Housing with suggested language and examples from other states that require third-party certifications, such as Georgia, Colorado, and Michigan.

Thank you for your continued commitment to transparency in the annual QAP process, and the opportunity to provide comments on the 2024 draft. We hope that South Carolina will join other leaders in affordable housing by requiring projects to achieve third-party certification. Please contact Rebecca Price at [REDACTED] if you have questions.

Sincerely,
Rebecca Price
Rebecca Price
State Advocacy Specialist,
U.S. Green Building Council
[REDACTED]

