



Office of the Mayor

September 23, 2025

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

Good afternoon,

The City of Greenville and the Greenville City Council continue to appreciate the work of SC Housing and the opportunity to provide comments on the 2026 Low Income Housing Tax Credit Qualified Allocation Plan. This is the second letter provided by the City of Greenville, and pertains to the QAP Page 12, Section IV.L.3.

To recap from the previous submitted letter dated August 7, 2025, Greenville City Council has consistently established affordable housing as a priority for our investment of local tax dollars. Our local commitment to providing more affordable housing in the City was established in our GVL2040 Comprehensive Plan for Growth which was adopted by City Council in 2021. This plan, which established our desire for at least 10% of all new housing in the City of Greenville to be affordable, requires a significant local funding commitment. Since the drafting of GVL2040 in 2020, the City of Greenville has provided over \$52 million through June 30, 2025, in direct and leveraged capital infusion, as well as land banking to accelerate the development of affordable housing. The unprecedented post-Covid growth and increased population in Greenville (10%+ growth since 2020), require us to explore every opportunity and partnership to bring more affordability and reduce downward pressure on our housing market.

We commend the SC Housing proposal to allow Urban counties, such as Greenville County, to receive two awards every other year. However, the second change proposed by SC Housing is problematic for the City of Greenville, especially in our Central Business District and surrounding downtown area. The proposal to exclude a project within a half mile of a previously funded project for two years would delay our progress to create more affordability in the Unity Park and downtown area. This proposed provision essentially creates an exclusion zone so downtown Greenville could only build a LiTHC supported project every three years. Our downtown business owners largely rely on a workforce that needs affordable housing at the



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60% AMI level and below, and we consider providing such housing as essential to supporting the workforce needs to sustain the vibrancy of this area. As such, we recommend that the provision outlined in the QAP page 12, Section IV.L.3 exempt urban areas from the ½ mile rule.

In our view, this exemption should apply to all South Carolina municipalities, or at least to those that exceed a certain population.

In an urban environment such as the City of Greenville, where demand for affordable housing is high, we do not see a reason for any proximity exclusion such as the proposed ½ mile rule. Given the size and density of Greenville, the draft language does not serve our community's interest and in fact, disadvantages dense municipalities such as the City of Greenville.

Knox White

A handwritten signature in black ink, appearing to read "Knox White".

Knox H. White, Mayor
Greenville, South Carolina