



Office of the Mayor

August 7, 2025

Kim Wilbourne
SC Housing
Low Income Housing Tax Credit Manager
3000-C Outlet Pointe Boulevard
Columbia, SC 29210

Good afternoon,

The City of Greenville and the Greenville City Council deeply appreciates the work of SC Housing and the opportunity to provide comments on the 2026 Low Income Housing Tax Credit Qualified Allocation Plan. As elected representatives of the largest municipality in the largest county in South Carolina, the 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 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 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 including 9% LITHC funded projects such as Gateway at the Green, The Riley at Overbrook, The Alliance and Southernside East. 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 offer these comments for your consideration on the 2026 QAP draft:

1. The City of Greenville supports a return to the policy of allowing up to 2 (two) new construction awards per year.
2. The City of Greenville supports a higher maximum unit count per project rather than a reduction from 100 to 80 as established in the 2025 QAP. Our growth places demand on key workforce areas such as first responders, health care and education providers. These sectors depend on staff that includes earners at 60% AMI and below. Higher density and scaleup, rather than reduced project parameters, are necessary for us to provide housing to support these workforce needs.
3. The City of Greenville supports various parties' comments from the roundtable of creating three allocation pools for Urban, Middle Population and Rural counties and allocating tax credits across all three (3) pools instead of the current "Urban" and "Rural" distinctions.

4. The City of Greenville supports maintaining the current draft QAP language that includes separate scoring allocations for Leverage Points and Land Donation or Ground Lease given the scarcity of these resources. In order to better position our City to support Affordable Housing projects, we have invested nearly \$11 million over the past five years in land acquisitions or contributions. In addition to recently acquired sites, the City has also contributed previously acquired properties that have appreciated in value over time, maximizing the impact of our investment.
5. The City of Greenville supports maintaining the 2025 QAP concept of awarding points for Project Based Voucher Rental Assistance in addition to the other Federal and State Credit scoring. Our city continues to experience a growing homeless population as evidenced by recent homeless population counts. The Project Based Voucher program used in conjunction with a 9% LITHC funded development allows the City to better address the challenges created by the growing homeless population in partnership with our local service providers.

Lastly, we appreciate the intentions of SC Housing in opening the 2026 9% preliminary round as early as mid-January, with the intention of receiving full 9% applications by mid-May 2026. Additionally, we support the concept of “forward funding” of projects as was discussed at the 2026 QAP Roundtable. Such a policy could assist our community in planning for these developments over an expanded timeline, potentially benefitting from economies of scale in bidding work for the projects further in advance of construction.

The City of Greenville community has benefitted from earning 9% LITHC awards in 2023 and 2024. We fully support the Greenville Housing Fund’s application for Southernside West in the 2025 application round, having donated the land for this project and providing a commitment for significant capital to support the project funding needs. While the collective impact of these projects will be significant, more is needed to address our housing needs for those earning below 60% AMI.



Knox H. White, Mayor
Greenville, South Carolina