



August 5, 2025

Richard Hutto
South Carolina State Housing Finance & Development Authority
300-C Outlet Point Boulevard
Columbia, South Carolina 29210

Thank you for hosting the 2026 Qualified Allocation Plan Roundtable and soliciting comments from interested parties to ensure that state policy benefits the people, especially those that are in desperate need of affordable housing.

On behalf of the Greenville Chamber and Upstate Chamber Coalition offers the following comments:

Greenville Chamber Comments on 2026 Draft QAP, Appendix C1 and C2:

1. The Greenville Chamber and Upstate Chamber Coalition (UCC) supports various parties' comments from the roundtable of instilling 3 bespoke 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.
2. The Greenville Chamber and UCC support various parties' comments from the roundtable of allowing more than one (1) new construction award per County per year up to 2 (two) new construction awards per year. The Chamber supports the comprise proposed in the roundtable discussion of if County receives two (2) new construction awards in any one (1) year, the following year, only one (1) new construction award will be awarded the following application cycle.
3. The Greenville Chamber and UCC support maintaining the current draft QAP language that includes separate scoring allocations for Leverage points and Land Donation or Ground Lease given the scarcity of both of these resources.
4. The Greenville Chamber and UCC support maintaining the 2025 QAP concept of awarding points for Project Based Rent Assistance. GHF applauds the addition of points scoring for developments using Other Federal and State Tax Credits, but GHF hopes to see the inclusion of the Project Based Rent Assistance points category in addition to the Other Federal and State Credit scoring alone.

5. 9% Allocation: The Greenville Chamber and UCC does not support removing the PHA set aside for one (1) new construction award set aside for the 9% round. PHAs are critical stewards of assets that house the lowest-income members of SC communities.
6. Appendix C2:
 - a. The Greenville Chamber and UCC supports SC Housing moving to a preliminary and full application model for 4% bond applications to conform with the current practices of the 9% round.
 - b. The Greenville Chamber and UCC supports TE Bond applications not seeking State Tax Credit allocation to be funded with priority above those requesting State Tax Credit subject to SC Volume Cap.
 - c. The Greenville Chamber and UCC supports TE Bond applications seeking State Tax Credit allocation to be reviewed in a separate scoring pool given the differences in availability of Volume Cap versus State LIHTC.

Thank you again for the opportunity to submit comments ahead of the published final 2026 QAP. We look forward to continued collaboration to benefit South Carolina.

Sincerely,

Matt Wills
VP, Government Affairs
Greenville Chamber

Executive Director
Upstate Chamber Coalition

Submitted via email; taxcreditquestions@schousing.com