

Wilbourne, Kim 9083

From: Bryan Brown [REDACTED]
Sent: Friday, August 1, 2025 5:12 PM
To: Wilbourne, Kim 9083
Cc: Libba King; Dorothy Dowe; Matt Wills
Subject: Fw: [External] QAP Roundtable - GHF Comments

Hi Kim

Congratulations on a successful QAP roundtable yesterday. You hosted a robust and substantive discussion of the QAP and the LIHTC program. We believe that by working together and getting the policies right, SC Housing can better leverage both the federal and state credit programs thus benefiting more people in need of affordable housing.

Our follow up comments are below. Thanks again and have a nice weekend!

Bryan Brown
President & CEO
Greenville Housing Fund

GHF Comments on 2026 Draft QAP, Appendix C1 and C2:

1. GHF supports various parties' comments from the roundtable of creating 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. GHF supports various parties' comments from the roundtable of allowing up to 2 (two) new construction awards per year for the URBAN counties. GHF supports the compromise proposed in the roundtable discussion whereby if a County receives two (2) new construction awards in any one (1) year, then the following year, only one (1) new construction award will be allowed to be awarded to that County the following application cycle.
3. GHF 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 both of these resources. Land is MUCH more valuable in URBAN counties than in smaller less populated locations while the local leverage shows local financial commitment to a development and is a critical subordinate tranche of financing.
4. GHF supports 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: GHF 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:
 1. GHF 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.
 2. GHF 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.
 3. GHF 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 the State LIHTC.

4. We believe SC Housing could be funding more applications by the approaches above and better utilizing BOTH federal and state credit volume.



Libba King

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