GREENVILLE HOUSING FUND

GAHC
Greenville Affordable Housing Coalition

September 22, 2025

Kim Welbourne
SC Housing Finance and Development Authority

Sent Via taxcreditquestions@schousing.com

Dear Kim,

On behalf of the Greenville Housing Fund and the Greenville Affordable Housing Coalition, thank you for the opportunity to provide additional feedback on the 2026 Low Income Housing Tax Credit Qualified Allocation Plan. We continue to commend SC Housing's commitment to engage with stakeholders as you work to address the affordable housing needs of communities across South Carolina.

As GHF stated in July, with the recent passage of the Federal Budget Reconciliation, which includes a permanent 12% increase in LIHTC allocations and permanently lowers the private activity bond (PAB) financing threshold from 50% to 25% of land and building costs, we encourage SC Housing to use this as an opportunity to expand the LIHTC program. This increase presents an important opportunity to finance more affordable housing developments and respond to the state's growing housing demand.

We respectfully submit the final follow-up comments and recommendations for your consideration:

GHF Comments on 2026 Draft QAP

Adjust Award Distribution Radius Distance Limit to Greater Than 1.0 Miles (Versus Current 0.5 Mile Maximum)

We recognize SC Housing's responsibility to support all counties across the state. However, the state's most urban areas will be penalized by the new language introduced in the most recent version of the 2026 QAP: "*Applications may not be for the same tenant populations within a one-half mile radius of existing Authority funded developments funded in the previous two (2) tax credit and tax -exempt bond application cycles*" that are pursuing urban infill development in vacant parcels in key downtown areas. We encourage SC Housing to introduce a carve-out of this requirement for the Urban pool if Applicants can demonstrate low vacancy rates historically (<7.0%) for similar properties with like-for-like tenant populations. GHF notes this will ensure the highest demand housing can be financed with LIHTCs and this critical program can continue to develop and preserve housing in core Urban markets.

Once again, we thank SC Housing for your continued work to address the state's affordable housing needs and for your openness to stakeholder feedback. We look forward to continued collaboration to ensure that the LIHTC program is structured to best serve South Carolina's diverse communities.

Sincerely,

Bryan Brown

Bryan Brown
President & CEO
Greenville Housing Fund