



October 29, 2025

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SC Housing

Sent Via taxcreditquestions@schousing.com

Thank you for the opportunity to submit the following comments on the 2026 LIHTC QAP.

Annual Operating Expenses

We agree and commend SC Housing increasing the annual operating expenses between \$4,000-6,000 per unit, per year.

Page 12: Section L.3.a

We understand and appreciate SC Housing's intent to avoid creating dense concentrations of affordable housing within limited geographic areas. However, we are concerned about the unintended consequences of this restriction, particularly in South Carolina's fastest-growing urban counties.

In rapidly developing metropolitan areas, this limitation may inadvertently prevent affordable housing from being located near major employment centers, public transit, and other essential amenities. By restricting new development near recently funded sites, the rule could unintentionally push affordable housing farther from areas of opportunity, increasing commute times, transportation costs, and the risk of displacement or gentrification.

Further, applying a uniform half-mile restriction across all counties may not reflect the realities of South Carolina's diverse housing markets. For example, Greenville County has grown by approximately 9.7% over the past five years, adding more residents than any other county in the Upstate region. During that same period, Greenville's Area Median Income (AMI) has increased on average by 2.8%, with a 10% increase in the past year alone. Given this pace of growth, Greenville's urban core is equipped to support additional affordable housing development, particularly in higher-density, transit-accessible locations. This rationale applies similarly to other rapidly growing urban counties across the state, where demand and capacity exist for denser affordable housing development.

We encourage SC Housing to incorporate an exception for high-growth urban counties, particularly within urban cores and census tracts experiencing rising Area Median Incomes (AMIs). Allowing flexibility in these contexts would promote a more balanced housing strategy and ensure that affordable housing keeps pace with market-rate development.