September 21, 2026

South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Boulevard
Columbia, SC 29210
Submitted via email: taxcreditquestions@schousing.com

Re: Public Comments on the State of South Carolina's 2027 Second Draft Qualified Allocation Plan

My name is Abbey Benesh and I serve as the Director of Advocacy at the Green Building Initiative (GBI). I want to thank the South Carolina State Housing Finance and Development Authority (SC Housing) for providing the public with the opportunity to submit comments related to the release of the second 2027 QAP draft. We are pleased to see that South Carolina's current QAP includes green building certification language, and we respectfully request that GBI's flagship rating system, Green Globes, be included alongside the other certifications listed given the distinct value it offers to project teams.

Green Globes provides a rigorous yet cost-effective framework for verifying a building's environmental performance, ensuring that sustainability measures are not just promised, but implemented and measured. This is particularly important in the development of affordable housing, where public resources are being invested and long-term operating costs matter deeply. To date, GBI has certified over 1 billion square feet of all types of commercial, public, and multifamily buildings, including over 17 million square feet in South Carolina. Additionally, Green Globes is included in the South Carolina Energy Independence and Sustainable Construction Act of 2007 as one of just two accepted certification standards for major facility projects.

GBI is an American National Standards Institute (ANSI)-accredited Standards Developing Organization. Accordingly, the Green Globes for New Construction and Green Globes for Existing Buildings standards are developed and maintained through an ANSI-approved process, ensuring they evolve alongside market needs and scientific advancements. Green Globes is recognized for its flexible, performance-based approach offering an alternative to rigid, prescriptive checklists. The system also emphasizes transparency and collaboration, featuring an intuitive online platform and direct support from a dedicated project manager and independent third-party assessor through the certification process.

Including Green Globes as an approved certification option would expand flexibility, reduce barriers to participation, and support a broader range of projects in achieving verified, high-performance outcomes.

We appreciate your consideration and look forward to future collaboration in advancing sustainable, affordable housing across South Carolina.

Best regards,

Abbey Benesh
Director of Advocacy
Green Building Initiative