October 27, 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 Draft Qualified Allocation Plan

My name is Abbey Benesh, and I serve as the Director of Advocacy at the Green Building Initiative (GBI). We thank the South Carolina State Housing Finance and Development Authority (SC Housing) for the opportunity to submit comments on the 2027 Draft Qualified Allocation Plan (QAP).

GBI is concerned by and opposes the removal of the five-point award for developers that achieve a qualifying green building certification, as provided in Section III(E) of Appendix C1, "Sustainable Building," of the 2026 QAP. Removing this incentive eliminates an important opportunity to encourage measurable sustainability and high-performance building practices in affordable housing. Where public resources are invested, green building certifications can help support energy and water efficiency, building durability, and long-term operating cost savings that benefit both property owners and residents.

We respectfully urge SC Housing to reinstate the five-point award for qualifying green building certifications in the 2027 QAP. Maintaining this incentive would signal the state's continued commitment to sustainable affordable housing while giving developers flexibility to select a certification pathway suited to their projects.

GBI is an American National Standards Institute (ANSI)-accredited Standards Developing Organization. The Green Globes for New Construction and Green Globes for Existing Buildings standards are developed and maintained through an ANSI-approved process, helping ensure they evolve alongside market needs and scientific advancements. Green Globes offers a flexible, performance-based approach that emphasizes project-specific solutions rather than relying solely on prescriptive checklists. Its transparent certification process includes an intuitive online platform, dedicated project manager support, and an independent third-party assessor.

Retaining a range of recognized third-party certifications, including Green Globes, would provide developers with greater flexibility while supporting verified, high-performance outcomes across South Carolina's affordable housing portfolio. **We encourage SC Housing to restore the green building certification points in the final 2027 QAP and continue recognizing the value of sustainable building practices in the development of affordable housing.**

Thank you for your consideration and for your continued work to support affordable housing across South Carolina.

Best regards,

Abbey Benesh
Director of Advocacy
Green Building Initiative