

Chris Austin

From: Mark Davidson [MDAVIDSON@brookspierce.com]
Sent: Friday, August 30, 2013 4:27 PM
To: Chris Austin
Subject: Comments on 2014 Qualified Allocation Plan

Hi Mr. Austin:

My firm and I have represented affordable housing developers with their tax credit projects in the Triad for over twenty years. We are proud of the minor role we have played in helping bring affordable housing to our area.

For that reason, I write in support of the following changes in the QAP.

1. Area Set –Asides. Treating Guilford and Forsyth Counties with their large urban populations substantially the same as rural counties having much smaller populations is not appropriate, especially when differing, much more favorable treatment is given Mecklenburg and Wake Counties.

2. “Timed Out” Automatic Disqualification. Especially in light of 1 and more generally the extremely competitive environment for tax credit allocations, automatically disqualifying experienced developers who are still managing tax credit compliance with existing projects on the basis of not having been awarded credits in the preceding five years would seem to unnecessarily exclude very qualified parties. This results in greatly reduced competition for the allocations, which while benefitting the fortunate developers still allowed to compete, does not benefit the State.

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