Wilbourne, Kim 9083

From: Andrea Wolford [redacted]
Sent: Friday, September 25, 2026 2:58 PM
To: Taxcreditquestions
Subject: [External] 2027 Draft QAP Comments

Good afternoon! Please see the below comments from our review of the 2027 Qualified Allocation Plan and related documents.

We would like for you to consider re-instating the Authority's position that all areas of the state are eligible for the 130% basis boost or provide a way for properties to receive a 130% basis boost if not in a QCT or DDA. Smaller properties, particularly in rural areas, seeking awards of tax credits in the rehabilitation set aside are unable to take advantage of the state LIHTC and would benefit from the 130% basis to improve financial feasibility.

On Appendix C-1, B. Set-Asides. 2 Rehabilitation, please consider increasing the maximum credits for the USDA rehabilitation set aside to $750,000 to cover rising construction costs and interest rates.

On Appendix C-1, V. Evaluation of Rehabilitation Applications, we would like to have the statement that buildings over 60 years old are not eligible to submit an application removed or increased to at least 75 years. While we understand the thought behind this language, we also know that many properties that will reach this age in the next 10-15 years years are in rural areas, supported by project based rental assistance, and maintain an occupancy of >97% confirming the need for such housing. Removing the ability for older properties to apply for LIHTC will result in the eventual loss of affordable housing throughout the state.

Thank you for your consideration.

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