Wilbourne, Kim 9083

From: Mark Richardson [redacted]
Sent: Friday, September 25, 2026 3:18 PM
To: Taxcreditquestions
Subject: [External] 2027 QAP comments.

Kim,

Here are my comments.

4 % deals:

The affordability section needs to be completely remove. Bond deals are tough to make work. If you make developers have lower median incomes bands the development will not work. Bond deals will usually only work 100% @ 60%.

On the qualified contract. Take out “sold a LIHTC property to an owner who then requests a qualified contract within five years of ownership.” The original LIHTC developer would not have control of that scenario. This would be for both 4% and 9%.

Take out supportive housing for 4% deals. It will not be feasible to make a bond deal work with these low rents.

Take out paying a $35,000 consultant fee. PHAs have their own set aside.

9%

Increase federal credits:

Urban from $1,450,000 to $1,650,000
Suburban from $1,350,000 to $1,550,000

Cap the State Credit to $1,000,000 per development.

Thank you for what you do and taking the time to prepare the QAP.

Thanks,

Mark

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