

Chris Austin

From: Gary Hammond [grh@grhco.com]
Sent: Friday, October 25, 2013 9:41 AM
To: Chris Austin
Subject: Comments regarding First Draft 2014 Qualified Allocation Plan

Importance: High

Chris,

Please consider these comments as you develop the 2014 QAP:

D. Capability of the Project Team, 1. Development Experience, (d):

Developers should be allowed to use their out-of-state tax credit experience in maximum points. The NCHFA is administering primarily a federal program and there should not be any barriers to entry for experienced and qualified out-of-state developers. There should not be any rules in this program that effectively enact interstate commerce barriers. Alternatively, the NCHFA could consider disallowing experience from states that have rules in their QAPs not allowing NC tax credit experience towards experience and maximum point awards.

F. Special Criteria and Tiebreakers, Paragraph 2. General Contractor

NCHFA should remove preference points for General Contractors that have their principal office in North Carolina. Similar to the reasons stated above, there should be a free flow of commerce across state lines and no rules should be enacted the restrict this commerce.

Thanks,

Gary

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