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BY MAIL and E-MAIL ([cdfihelp@cdfi.treas.gov](mailto:cdfihelp@cdfi.treas.gov))

NMTC Program Manager  
CDFI Fund - U.S. Department of the Treasury  
601 13th Street, NW, Suite 200 South  
Washington, DC 20005

JUL 03 2007

Dear Project Manager:

Thank you for providing Iowa Business Growth the opportunity to comment on the May 22<sup>nd</sup> request for comment in the Federal Register relating to New Markets Tax Credits and specifically how the CDFI Fund can ensure that non-metropolitan counties receive a proportional allocation of qualified equity investments (QEIs). Iowa Business Growth is a Certified Development Company that assists banks in financing "Economic Development" projects within the state of Iowa. Iowa Business Growth is also the "Controlling Entity" of Iowa Community Development, which received a \$45 million dollar allocation last round.

It has been almost a year since we received word that Iowa Community Development had been successful in receiving an allocation. During this year, we have had the opportunity to more fully understand the advantages and shortcomings of the NMTC program. Iowa Business Growth would make the following suggestions to improve the NMTC program, allowing NMTCs to be more available to needy areas of the country.

1. Allocations of QEIs

- (a) Location of investors - Should the CDFI Fund endeavor to ensure that a desired proportion of investors (those persons or entities making QEIs in CEDs) reside or be headquartered in non-metropolitan counties?

Answer: No.

- (b) Location of allocatees - Should the CDFI Fund endeavor to ensure that either:

- i. A desired proportion of NMTC allocatees (as a percentage of the total number of allocatees) in any given NMTC allocation round is headquartered in non-metropolitan counties?

Answer: No.

or

- ii. A desired proportion of NMTC allocation authority (as a percentage of the total dollar amount of allocation authority) in any given NMTC allocation round is provided to CDEs headquartered in non-metropolitan counties?

Answer: Yes.

- (c) Principal service area of allocatees - Should the CDFI Fund endeavor to ensure that either:

- i. A desired proportion of NMTC allocates (as a percentage of the total number of allocates) in any given NMTC allocation round is “principally serving” (i.e., making QLICIs in) non-metropolitan counties?

Answer: No.

- ii. A desired proportion of NMTC allocation authority (as a percentage of the total dollar amount of allocation authority) in any given NMTC allocation round is provided to CDEs principally serving non-metropolitan counties?

Answer: Yes.

If so, what is the appropriate meaning of “principally serving” (e.g., 85 percent of total QLICIs made by the CDE, 50 percent of total QLICIs made by the CDE, or another calculation)? We note the statute requires a proportional amount of QEI’s to go to non-metropolitan counties and QEI’s go to CDE’s. Consequently to meet the statute, the proportional amount must be allocated to non-metropolitan CDE’s. To meet Congress’s intent QEIs must also go to non-metropolitan CDE’s that serve non-metropolitan areas.

Answer: 50 percent of total QLICIs.

- (d) Location of QLICIs - Should the CDFI Fund endeavor to ensure that a desired proportion of QLICIs is provided in non-metropolitan counties, without consideration of where the CDE is headquartered or which counties (metropolitan vs. non-metropolitan) that it is principally serving?

Answer: No, we believe the non-metropolitan counties will be best served by non-metropolitan CDEs as the program relates to non-metropolitan

counties. We consequently believe that CDE's should be based in non-metropolitan areas or metropolitan areas of less than one million population. CDEs based in metropolitan areas of a million population or more should not access the NMTCs intended for non-metropolitan areas.

2. Proportionality

- (a) Specifically, with respect to alternatives (a) and (d) under the first issue, should the CDFI Fund define the term proportional to mean: the proportion of the U.S. population that resides in non-metropolitan areas (approximately 17.4 percent); the proportion of low-income communities that are located in non-metropolitan areas (approximately 25 percent); or another calculation?

Answer: 25 percent. Please also see our comment to 1(c)(ii) above.

- (b) With respect to alternatives (b) and (c) under issue 1, should the proportion pool for a given NMTC allocation round (for example, if 25 percent of the applicant pool consists of CDEs that predominantly serve non-metropolitan areas, the CDFI Fund would ensure that 25 percent of the allocates predominantly serve non-metropolitan areas); or (ii) that portion of the applicant pool that, after the first phase of application review and scoring, met or exceeded the minimum scoring threshold to be eligible for NMTC allocations?

Answer: Neither, non-metropolitan America has been under-funded and the 25%-35% percentage of NMTC authorized for non-metropolitan areas should be allocated in full irrespective of the ratio of applying non-metropolitan CDEs to all applying CDEs.

- (c) With respect to alternatives (c) and (d) under issue 1, should the percentage of QLICIs made in low-income communities be based upon the total number of QLICIs made by a CDE, or the total dollar amount of those QLICIs?

Answer: The total dollar amount of these QLICI's.

Additional Suggestions

Rural Mid-America began bleeding from out migration many, many years ago and is at serious risk of death. The out migration was and is principally of the younger population. As the remaining older members die they are not being replaced and the area is dying with them.

The eligibility test of the CDFI does not adequately evaluate either the needs of these regions or the risk of such regions' disappearance from the American montage. For example, although rural Iowa is in serious difficulty as a result of loss of population and a remaining aged population, few areas qualify as targeted areas. Those older people remaining in rural Mid-America often have incomes just adequate to sustain them, often just enough income to exceed CDFI's eligibility standards. This results in the absence of areas that qualify and leads to inadequate aid from NMICs even though the areas are under great stress none-the-less.

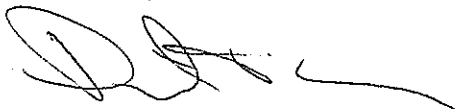
1. Counties in which residents over the age of sixty-five exceed 15.0 percent of the population and which have experienced a population loss in the last 20 years will qualify.

2. Given that only 7% of previous New Market Tax Credit (NMTC) awards have gone to non-metropolitan America and that 25% of the qualifying census tracts are non-metropolitan, we recommend that 35% of future NMTC awards be made in non-metropolitan census tracts. Awards from this 35% allocation should be made only to CDFI's and CDE's located in non-metropolitan areas or metropolitan areas of less than one million population and also domiciled in states that have only non-metropolitan census tracts or metropolitan areas of less than one million population. Awards made from this 35% may also only be deployed within those states that do not have any metropolitan areas exceeding one million in population.

3. In determining a non-metropolitan NMTC award the CDFI should also consider the workforce labor shed surrounding that NMTC qualifying census tract. If any contiguous census tract to a qualifying non-metropolitan census tract is also considered to be non-metropolitan, and part of the qualifying census tract's workforce labor shed comes from that contiguous census tract, then that contiguous census tract should be deemed to be a qualifying census tract for NMTC awards.

Thank you for your consideration of our recommendations and should you have any questions, please feel free to contact me at 515-223-4511, ext. 101.

Sincerely,



Daniel T. Robeson  
Executive Vice President  
Iowa Business growth Company