

I will be testifying on behalf of the Washington State Housing Finance Commission, Washington State's LIHTC allocating agency. Briefly, my comments will focus on the following:

- Permanent unit set-aside designations create long-term operational problems.
- The AIT proposed rule generally and specifically contradicts intent of LIHTC program and the Income Averaging election.
- Proposed rule creates new monitoring role for HFAs that supercedes their authority.
- Tying set-asides to units conflicts with other housing programs as well as Fair Housing and VAWA regulations.
- Proposed rule has chilled election of IA in our state.

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