SUMMARY OF CITIZEN PARTICIPATION PROCESS AND PROPOSED CHANGES
2023 HOUSING CREDIT QUALIFIED ALLOCATION PLAN, 2023 HOME ACTION PLAN,
2023 NATIONAL HOUSING TRUST ALLOCATION PLAN, and the
AHFA HOME-AMERICAN RESCUE PLAN
(a significant amendment to the 2021 HOME Action Plan)

In accordance with Section 42 of the Internal Revenue Code and the HOME and National Housing Trust Fund Regulations, notices of the Public Hearing and the 30-day public commenting period for the draft 2023 Housing Credit Qualified Allocation Plan, draft 2023 HOME Action Plan, draft 2023 National Housing Trust Fund Allocation Plan, and the draft AHFA HOME-American Rescue Plan (Plans) were published in the Birmingham, Huntsville, Mobile, and Montgomery newspapers and on the Alabama Housing Finance Authority (AHFA) website. AHFA emailed 1,796 notices on June 21, 2022, and 1,875 notices on June 30, 2022, of the draft Plans availability to interested parties, requesting that they submit oral comments at the Public Hearing or written comments regarding the proposed Plans by 5:00 p.m. CDT on August 15, 2022. During the designated commenting period, AHFA received 122 written comments from 36 individuals and organizations pertaining to the 2023 Plans. The comments are attached and available for review at the following AHFA website link:
https://www.ahfa.com/multifamily/allocation-application-information/current-year-allocation-plans

AHFA reviewed the comments received and revised the Plans based on certain comments submitted. A summary of the proposed changes to the Plans are attached. Once the final Plans have been formally approved, we strongly encourage each reader to review the final Plans completely to view any changes made by AHFA in their full context. When revisions have been finalized and approved, the Plans will be available for review in their entirety at the following AHFA website link:
https://www.ahfa.com/multifamily/allocation-application-information/current-year-allocation-plans

AHFA wishes to thank the many individuals and organizations who provided comments during the commenting period. While all comments were carefully reviewed and considered, only the most equitable comments pertaining to the process for the entire state and the variety of program participants resulted in changes being made to the final Plans. As the administrator of the Plans, AHFA's goal is to develop written criteria for the Plans that will provide equal access to all types of affordable housing developments, which include but are not limited to: various construction types (new construction, acquisition, rehabilitation, and adaptive reuse, etc.); diverse target populations (families, seniors, persons with mental and physical disabilities, Veterans, and homeless populations, etc.); and geographical characteristics (rural, metropolitan, qualified census tracts, distressed areas, etc.). In attempting to reach varied needs and population types across the state, our greatest challenge is to develop a fair and balanced allocation methodology with the intent to ensure that all applications, regardless of the targeted population and construction type, will have a fair chance of competing during each Application Cycle.

To that end, please keep in mind that certain perceived scoring impediments for a particular type of organization can be offset by other incentives in the Plans, which may not be necessarily applicable to other types of organizations. In addition, please consider that the Plans are not intended to serve as a replacement for other discontinued housing programs, which may have had different standards, costs, or otherwise. This is especially true as it relates to construction design standards. Any applicant that proposes to include design standards that significantly exceed AHFA standards or to include other design standards mandated by other programs must obtain additional funding sources to offset any additional costs, assuming the project's costs exceed AHFA's definition of reasonable costs. As an alternative and when feasible, applicants should consider submitting an application for Multifamily Housing Revenue Bonds, which are subject to availability, provided on a first-come, first-served basis, and subject to the criteria and requirements of the applicable Plan.

Addenda:

A. Summary of Proposed Changes to the 2023 Housing Credit Qualified Allocation Plan
B. Summary of Proposed Changes to the 2023 HOME Action Plan
C. Summary of Proposed Changes to the 2023 National Housing Trust Allocation Plan
D. Summary of Proposed Changes to the AHFA HOME-American Rescue Plan
E. Public Comments Submitted to AHFA

Addendum A
AHFA Multifamily Division
Summary of Proposed Changes to the 2023 Housing Credit Qualified Allocation Plan

Section	Page Reference*	Section Name	Description of Change(s)
II	11	Status of Previously Funded Projects	Added the following threshold requirement specific to all previously approved 2018, 2019 and 2020 projects: If any application has a Responsible Owner that is also a Responsible Owner for a project that (i) received an initial allocation of Housing Credits in 2018, 2019 or 2020 (ii) received a Determination Letter of Housing Credits for a Multifamily Tax-Exempt Bond project in 2021 or 2022 and (iii) is more than 50% complete as reflected by the project's most recent construction inspection report/progress report to AHFA on or before the date of application, the application is not eligible to receive an allocation of Housing Credits in the 2023 application cycle or eligible to apply for Multifamily tax-exempt bonds until such criteria are met.
I	15	Extended Use Period	Extended Use Period. All Projects must commit in writing to not apply for a Qualified Contract until after the 19th year of the Extended Use Period, which is 4 years after the 15-year compliance period. Add to Addendum A - QAP Point Scoring System: A(iii)(d.) Extended Use Period. 3 points will be given to projects who commit to forego submitting a Qualified Contract and remain affordable throughout the extended use period (Total of 30 years)
Point Scoring	A-2 & A-8	Tie-Breakers	A new tie-breaker was added (5), and the order was adjusted. 1. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application that has the least amount of aggregate participation by any one Responsible Owner. Aggregate participation is defined as the total of all Housing Credit and HOME/Housing Credit applications recommended for allocation in the current application cycle. 2. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application that has a Responsible/Related

*Referenced pages were based on the draft versions of the Plans presented on the AHFA website. Page references in final version of the Plans may not coincide with those in the draft versions.

Addendum A
AHFA Multifamily Division
Summary of Proposed Changes to the 2023 Housing Credit Qualified Allocation Plan

Section	Page Reference*	Section Name	Description of Change(s)
			Owner that registered by December 31, 2022, and is participating in the: Streamlined Application Processing Program for AHFA Funded Projects and/or AHFA Property Bulk Rental Assistance Program 3. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application submitted by a Responsible Owner that did not exchange or received an additional allocation of Housing Credits or HOME funds on a prior-funded 2018, 2019, or 2020 AHFA Project. 5. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application located in a Census Tract where the 2020 Estimate Tract Median Family Income from the Federal Financial Institutions Examination Council (FFIEC) Census and Demographic Data is equal to or higher than 100% (rounded down) of the county's 2022 Median Family Income published by HUD
Point Scoring	A-6	Rent Affordability – New Funds	Add: Section 108 Loan Guarantee Program Coronavirus State and Local Fiscal Recovery Funds (SLFRF)
Point Scoring	A-10	Applicant Characteristics	This section was modified to reflect the following options: Points for minority or women in the ownership, and/or points for contracts with minority or women owed businesses.

End of Addendum A

Addendum B
AHFA Multifamily Division
Summary of Proposed Changes to the 2023 HOME Action Plan

Section	Page Reference*	Section Name	Description of Change(s)
IVC	19	Extended Use Period	Extended Use Period. All Projects must commit in writing to not apply for a Qualified Contract until after the 19th year of the Extended Use Period, which is 4 years after the 15-year compliance period. Add to Addendum A - QAP Point Scoring System: A(iii)(d.) Extended Use Period. 3 points will be given to projects who commit to forego submitting a Qualified Contract and remain affordable throughout the extended use period (Total of 30 years)
Point Scoring	A-2 & A-8	Tie-Breakers	A new tie-breaker was added (5), and the order was adjusted 1. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application that has the least amount of aggregate participation by any one Responsible Owner. Aggregate participation is defined as the total of all Housing Credit and HOME/Housing Credit applications recommended for allocation in the current application cycle. 2. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application that has a Responsible/Related Owner that registered by December 31, 2022, and is participating in the: Streamlined Application Processing Program for AHFA Funded Projects and/or AHFA Property Bulk Rental Assistance Program 3. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application submitted by a Responsible Owner that did not exchange or received an additional allocation of Housing Credits or HOME funds on a prior-funded 2018, 2019, or 2020 AHFA Project.
Point Scoring	A-6	Rent Affordability – New Funds	Add: Section 108 Loan Guarantee Program Coronavirus State and Local Fiscal Recovery Funds (SLFRF)
Point Scoring	A-10	Applicant Characteristics	This section was modified to reflect the following options:

*Referenced pages were based on the draft versions of the Plans presented on the AHFA website. Page references in final version of the Plans may not coincide with those in the draft versions.

Addendum B
AHFA Multifamily Division
Summary of Proposed Changes to the 2023 HOME Action Plan

Section	Page Reference*	Section Name	Description of Change(s)
			Points for minority or women in the ownership, and/or points for contracts with minority or women owed businesses.

End of Addendum B

Addendum C
AHFA Multifamily Division
Summary of Proposed Changes to the 2023 National Housing Trust Fund Allocation Plan

Section	Page Reference*	Section Name	Description of Change(s)
National Housing Trust Fund Allocation Plan			No comments were received; therefore, no changes were made to the final 2023 National Housing Trust Fund Allocation Plan.

End of Addendum C

Addendum D
AHFA Multifamily Division
Summary of Proposed Changes to the AHFA HOME-American Rescue Plan

Section	Page Reference*	Section Name	Description of Change(s)
V	13	Use of HOME-ARP Funding	Use of HOME-ARP Funding. AHFA may allocate HOME-ARP funds to an approved project in one of following ways: 1. As a forgivable grant. Repayment of a grant of HOME-ARP funds will be forgiven entirely (but never in part) if the funded Project remains in compliance with HOME-ARP and AHFA requirements for the entire HOME-ARP Affordability Period. 2. A loan. The HOME-ARP loan will bear an interest rate of one-half of one percent (1/2%) accrued annually with all principal and accrued interest payments due at the end of the 15th year. In the event of default, AHFA reserves the right to set a default rate more than the prevailing Prime Lending Rate applicable at the time of default.
V	17	Extra Amenities	Based on comments, the following amenities were added for points: - Basketball court - Picnic area - Storm doors - Emergency Pull Cord/Call Button - Attached bike rack - Gazebo
Point Scoring	19	Tenant Supportive Services Location	This section was modified to reflect the following options: A - 6 points will be given to a project that is located within 5 miles of a supportive service provider. or B - 6 points will be given to a project having a Service Agreement/MOU with a service provider (regardless of service provider office location) for the provision of onsite services for the project's Qualifying Populations for the duration of the compliance period.
Point Scoring	19 & 20	Census Tract Location	In response to comments, we broadened the scoring for Census Tract Location.
Point Scoring	22	Supportive Service Providers: Case Management	The points for this section were modified based on comments: A maximum of 10 points will be given for providing comprehensive services by Supportive Service Providers (Provider). - 10 points for 3 Services - 7 points for 2 Services

End of Addendum D

*Referenced pages were based on the draft versions of the Plans presented on the AHFA website. Page references in final version of the Plans may not coincide with those in the draft versions.

Public Comments Received

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Public Hearing			Sandra Conley – with The Kelsey suggested increase incentives for each 5% set aside up to 25%. She would lik	7/14/2022	Sandra Conley	The Kelsey
Public Hearing			Jay Williams – with Low Income Housing Coalition of Alabama would like to see flexible use of HOME ARP funds to meet gaps in service in the Low-Income Housing communities and partner with such programs as ERA for efficient use of these funds. He recommends full implementation of all eligible activities available under HOME ARP.	7/14/2022	Jay Williams	Low Income Housing Coalition of Alabama
Public Hearing			Veronica McGee – with The Kelsey/Accessible Alabama is advocating for housing policy change in Alabama for accessibility, affordability, and inclusivity for the disabled in Alabama. She would also like to see AHFA apply for funding through HUD Section 8, Capital Exams Grants and Project Based Rental Assistance (PRA) for funding to subsidize the development and operation of housing for the disabled.	7/14/2022	Veronica McGee	The Kelsey/Accessible Alabama

Plan	Section	Page	Comment	Date Received	Commentor	Organization
General Comment			135 Day Reservation Items The soils report and paving recommendation letter are out of place in the 135 day items list since work on those cannot be started until after AHFA/HUD environmental approval. Preferably, AHFA could provide guidance that these two items are not a Choice Limiting Activity, which would allow them to be submitted with the plans and specifications prior to environmental clearance. This would allow several of the construction related items to proceed more quickly. Otherwise, we request that the soils report and paving recommendation letter due date be moved to a separate due date of 60 days after environmental clearance is received from HUD. 165 Day Reservation Items The construction cost estimate summary, construction schedule, construction contract, and contractor's state license should be due within 60 days after AHFA approves the plans and specifications. The current 165 days items schedule requires those items to be submitted within 30 days after the plans and specifications, etc. are submitted to AHFA. The plans and specifications are normally approved by AHFA HOME developments around 30-45 days after submittal of the soils report and paving recommendations letter. We request that the deadline for submitting the 165 day items be changed to 60 days after AHFA approval of plans and specifications. The general contractor and subcontractors need time to review the final approved plans before obtaining job bids and finalizing costs, the construction schedule, and construction contract. This is especially true in the COVID era of pricing volatility. 195 Day Reservation Items We recommend that the 195 day items due date be changed to 60 days after the deadline to submit the construction contract, schedule, etc. All of those items cannot be provided until after the construction contract is final which allows for the remainder of the development cost estimates to be finalized for final syndicator and construction lender approval. These changes would help to eliminate repeated extension requests for these items and save both AHFA and developers time and manpower. If soil borings are not able to be considered choice limiting activities, Speeding up the environmental process could assist greatly in meeting deadlines established and forward committing the credits could help in some situations	8/9/2022	David Morrow	Morrow Realty

Plan	Section	Page	Comment	Date Received	Commentor	Organization
General Comment	Compliance		Please clarify, in the Compliance Manual, or wherever appropriate, what annual documents are required to be submitted to AHFA for projects that have completed a HOME 5 and/or 15 year extension. Also, is AHFA approval required for rent increases and utillity allowance changes for 5 and 15 year extensions?	8/11/2022	Amy Montgomery	Hall Housing Group
General Comment	Compliance		135 Day Items - The soils report and paving recommendation letter are out of place in the 135-day items list since work on those cannot be started until after AHFA/HUD environmental approval. Preferably, AHFA could provide guidance that these two items are not a choice limiting activity, which would allow them to be submitted with the plans and specifications prior to environmental clearance which would allow several of the construction related items to proceed more quickly as it is already taking long delays in city approvals, architects are short staffed, and it takes another 6-8 weeks to get soils reports due to shortage of access to drill trucks. Otherwise, I recommend moving the soils report and paving recommendation letter to a separate due date of 60 days after environmental clearance is received from HUD with a future year reservation	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation
General Comment			For deals closing late in the year of the year prior to the placed-in-service (PIS) deadline we would like for AHFA to provide a certain level of comfort prior to closing that the PIS deadline could be extended if needed. This could Include but not be limited to exchanging credits. Knowing there is flexibility with the PIS deadline in an environment where the construction period has become increasingly uncertain will offer lenders and investors the assurances necessary to close.	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation
General Comment			We would appreciate AHFA considering a reduction in the fees being charged for documents that are overlooked or that are missing from the applications that need clarifications submitted or corrected during the Threshold and Scoring round. We appreciate AHFA allowing these corrections/clarifications and any possible reduction for the fees in this area would help all the applicants to which these apply. Also, we would appreciate a reduction in some of the extension fees charged for funded projects that cannot meet AHFA deadlines for reasons out of the owner’s control. The fees can get exorbitant, depending on the circumstances, when the documents are not available and multiple extensions have to be requested.	8/11/2022	AAHA	Alabama Affordable Housing Association

Plan	Section	Page	Comment	Date Received	Commentor	Organization
General Comment			We applaud AHFA for adding a point incentive to their HOME Action and Qualified Allocation Plans, and adminstering the HTF and HOME-ARP for homeless, at risk of homelessness, disabled (physical & mental) and ELI populations. Consumers/individuals benefiting from these set-asides may not have the safe, affordable, decent housing otherwise, as many live below the povertly level and cannot afford market rent. They face barriers, negative judgement, social unacceptability, and other misconceptions and fears during their search for safe, decent affordable housing. Again, we appreciate your incentive, as it allows those with the greatest need to avoid stigma and misconceptions, and instead live healtheir happier lives in the community.	8/11/2022	Carrie Bearden, Executive Director	Cahaba Center
				8/12/2022	Shelia Hurley	CED Mental Health
				8/15/2022	Valerie Wesson	Riverbend
General Comment			For projects which have not been able to move to a construction loan/equity closing and have a PIS deadline of 12/31/2023, it is going to be extremely important that those developments are allowed to submit for additional funding and/or exchange of credits (if AHFA decides to do this) and find out of they have the funding by the 4th quarter of 2022. If this can't happen in that timeframe, the investors and bankers most likely will not be willing to move forward with these projects.	8/15/2022	Ann Marie Rowlett	Rowlett & Company, LLC
HOME-ARP	V - Activities	12	In an effort to address the housing needs for qualifying populations currently residing in Permanent Supportive Housing (WYATT units) that are nearing the end of the affordability period, a portion of the HOME-ARP funds should be allocated to preserve those units and allow current tenants to continue to reside in safe affordable housing, especially housing in rural areas which is often faced with its' own unique challenges. We agree that new affordable units are needed to increase the housing supply, however feel that funding for current units should be a priority, as most of the 100% Supportive Housing Units were 12 units or less and probably would not attract investors for the LIHTC rehabilitation credits. We ask that AHFA consider utilizing a portion of the HOME-ARP funds to maintain and preserve these units in the form of operational or reserve funds for those qualifying who without this assistance are at the greatest risk of housing instability due to aging projects. If a fixed portion cannot be allocated, please consider allocating any remaining funds (if any) in a effort to fully make use of the $35.3M.	8/11/2022	Carrie Bearden, Executive Director	Cahaba Center
				8/12/2022	Shelia Hurley	CED Mental Health
				8/15/2022	Valerie Wesson	Riverbend
				8/15/2022	Harry Findley	UAB Community Psychiatry

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME-ARP	V - Activities	12	We applaud AHFA's plan to utilize these funds to support housing for our most vulnerable citizens and appreciate the thoughtfulness that went into assuring that not only there was the requisite development experience, but also that there were members of the team who understand how to advocate for QPs & can provide case management services	8/12/2022	Mary Ellen Judah	Neighborhood Concepts, Inc.
HOME-ARP	V - Activities	13	This plans states operating cost assistance (as defined in CPD Notice 21-10) will be an eligible expense. As we understand, operating cost assistance covers the difference in the cost to operate the project, less revenues received from rental assistance, tenant payments, etc. Is this correct? And will the operating cost assitance reserve be designed to cover costs for 15 years as stated in the CPD Notice?	7/5/2022	Chris Retan	Aletheia House
HOME-ARP	V - Activities	13	Please clarify how HOME ARP funds will be structured, i.e., grant, below market loan or forgivable loan? Depending upon ownership structure and/or whether combined with LIHTC, there could be tax implications.	8/12/2022	Mary Ellen Judah	Neighborhood Concepts, Inc.
HOME-ARP			We have previously received HOME funds from local PJs that stated in the agreement the funds were a loan that would be forgiven after the 15 year compliance period. AHFA has traditionally taken a approach with LIHTC projects that these loans had to be repaid. Clearly, these projects will not have the ability to repay a loan after 15 years. Can you please include in the plan a statement that loans will be forgiven after 15 years for projects that are in compliance with the HOME terms?	7/5/2022	Chris Retan	Aletheia House
HOME-ARP	V - Activities	13	This is regarding Section V., Page 13. This plans states operating cost assistance (as defined in CPD Notice 21-10) will be an eligible expense. As we understand, operating cost assistance covers the difference in the cost to operate the project, less revenues received from rental assistance, tenant payments, etc. Is this correct? And will the operating cost assitance reserve be designed to cover costs for 15 years as stated in the CPD Notice?	7/15/2022	Chris Retan	Aletheia House

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME-ARP	V - Activities	DQS	Paragraph V. HOME-ARP Activities: the second paragraph indicates "all new construction rental housing will be required to meet AHFA's current Design Quality Standrads and Construction Manual." AHFA should consider waiving some of the current standards so as to allow for the produciton of "tiny house" designs that may be more appropriate for some populations than is multifamily housing, and less costly than single family housing. This might also include dropping the requirment for the use of brick, and allow less expensive exterior filnishes.	8/15/2022	Fred Bennett	Bennett & Company
HOME-ARP	V - Activities	DQS C-10	The current Design Quality Standards and Construction Manual does not address all of the types of housing that might be appropriate to serve individuals experiencing homelessness. For example, one of the fastest growing approaches to providing permanent supportive housing is to provide small, individual housing units that are grouped on a single lot with a community center where supportive services are provided. These projects are often called " tiny home" projects. (Note: There are several types of projects called tiny home projects, but we would want AHFA to consider those where the units are at least 600 square feet). Many of these houses have been designed to make innovative use is the space. The current Design Quality standards only address single family houses that have three or four bedrooms and 2 baths. They require each house to be on a lot that is at least 50 feet wide. This is not appropriate for a project that wants to implement the tiny house model. We would recommend changing the plan to state all projects that do not meet the current Design Quality Standards will be reviewed by a design consultant.	7/5/2022	Chris Retan	Aletheia House
HOME-ARP	V - Activities	DQS	Would AHFA consider relaxing the design standards? These type projects would vary in size so many of the standards would be burdensome on the smaller projects.	8/5/2022	Phil Ellen	Paladin, Inc.
HOME-ARP	VI - Production Housing Goals		There is no clear indication that the development/ownership team may be paid a fee to develop a project. Just as AHFA itself takes a 15% "admiistrative fee" to administer the overall program and devote the staff time needed to make it successful, devlopment teams should be paid a fee for the same reasons: to aid in providing staff to produce and manage the property, and the support services provided. This would also incentivise the industry to utilize these funds fully, and reduce or avoid the risk of unused program funds.	8/15/2022	Fred Bennett	Bennett & Company

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME-ARP	Point Scoring	17	Extra Amenities - please consider including extra amenities that will contribute to the targeted population's stability and sustainability such as a computer center where they can practice skills, apply for jobs or benefits, etc. or a community garden that provides access to healthy, free foods	8/12/2022	Mary Ellen Judah	Neighborhood Concepts, Inc.
HOME-ARP	Point Scoring	19	General Comment: Rent Affordability: New Funds The 3 to 5 points in aggregate does not provide a list of funds "listed below". Can projects have a commitment of new funds from any entity?	8/11/2022	Carrie Bearden, Executive Director	Cahaba Center
				8/12/2022	Shelia Hurley	CED Mental Health
				8/15/2022	Harry Findley	UAB Community Psychiatry
				8/15/2022	Valerie Wesson	Riverbend
HOME-ARP	Point Scoring	19	Points Gained for Site Selection Tenant Supportive Services Location (6 Points) Recommend that AHFA remove the 6 point incentive for those services that are located within 5 miles of the supportive service provider. This may not be feasible for those service providers who cover several counties, especially those counties in rural areas. Rural areas have limited resources and often times non-profits and other advocates cover a tri-county area. Although it may be ideal to be within 5 miles of services, the services provided by these agencies are needed in various locations with consumers in scattered site or other housing. Instead, perhaps AHFA can allow newly constructed projects located in rural areas the opportunity to submit the best option available for the grocery store (as written for existing multifamily projects in the point-scoring section of this plan).	8/11/2022	Carrie Bearden, Executive Director	Cahaba Center
				8/12/2022	Shelia Hurley	CED Mental Health
				8/15/2022	Harry Findley	UAB Community Psychiatry
				8/15/2022	Valerie Wesson	Riverbend

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME-ARP	Point Scoring	19	The best supportive housing programs provide tenant supportive services onsite or provide transportation to them. Since most tenants don't have cars, having supportive services located within 5 miles of the housing isn't very helpful. We suggest changing this to say " 6 points wil ge given to a project that provides supportive services on-site or within 0.5 miles of the property or that provides transportation to the supportive service provider.	7/15/2022	Chris Retan	Aletheia House
HOME-ARP	Point Scoring	19	Points Gained for Site Selection Rural communities often face unique challenges when dealing with the affordable housing crisis; with a lack of development, higher construction costs and reduced incentives for private investments, and other income disparities as compared to more urban/populated areas of Alabama. As noted during the Consultation Process by the Alabama Rural Coalition for the Homeless, more housing units are needed in rural areas; Therefore, it is imperative that AHFA address the housing needs for Qualifying Populations living in Rural areas of Alabama. We suggest that AHFA consider removing the 6- Points Tenant Services Location Points, and replacing this point incentive with points to ensure that funds are available to address the housing needs of Qualifying Populations residing in rural areas of Alabama.	8/11/2022	Carrie Bearden, Executive Director	Cahaba Center
				8/12/2022	Shelia Hurley	CED Mental Health
				8/15/2022	Harry Findley	UAB Community Psychiatry
				8/15/2022	Valerie Wesson	Riverbend
HOME-ARP	Point Scoring	19	Site Selection - Many of these residents will not have their own transportation. Please consider including points for properties located along bus routes or accessible by other regular and consistent transportation (i.e., senior center vans, etc.)	8/12/2022	Mary Ellen Judah	Neighborhood Concepts, Inc.
HOME-ARP	Point Scoring	19 & 20	To best serve the QP would AHFA consider removing the points section for neighborhood services and census tract points. QP need to be near transit and those areas could be more difficult to gain those points.	8/5/2022	Phil Ellen	Paladin, Inc.

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME-ARP	Point Scoring	19	General Comment: Rent Affordability: Rental Assistance The current text reads .... "so that rents are affordable to ELI families." Should this read ... "so that rents are affordable to qualifying populations", or taken out completely .... "so that rents are affordable"? Per CPD Notice 21-10, eligible populations are 70% max QP and 30% max LI. ELI may fall within this range, however this may be misleading as some LI tentants who would not otherwise qualify as QP may have PBRA or TBRA. Would projects qualify for these points if the rental assistance is not specifically for ELI?	8/11/2022	Carrie Bearden, Executive Director	Cahaba Center
				8/12/2022	Shelia Hurley	CED Mental Health
				8/15/2022	Harry Findley	UAB Community Psychiatry
				8/15/2022	Valerie Wesson	Riverbend
HOME-ARP	Point Scoring	19	We applaud AHFA for adding a point incentive to their HOME Action and Qualified Allocation Plans, and adminstering the HTF and HOME-ARP for homeless, at risk of homelessness, disabled (physical & mental) and ELI populations. Consumers/individuals benefiting from these set-asides may not have the safe, affordable, decent housing otherwise, as many live below the povertly level and cannot afford market rent. They face barriers, negative judgement, social unacceptability, and other misconceptions and fears during their search for safe, decent affordable housing. Again, we appreciate your incentive, as it allows those with the greatest need to avoid stigma and misconceptions, and instead live healtheir happier lives in the community.	8/12/2022	Shelia Hurley	CED Mental Health
				8/15/2022	Harry Findley	UAB Community Psychiatry
HOME-ARP	Point Scoring	22	Case management (which is defined as identifying needs and connecting tenants to community resources) is an essential element of supportive housing. It should be listed as an eligible supportive services with a 10 point value. Medical services should also be listed as being eligible. We would recommend offering two points per service (other than case management) with a maximum of 8 points (four services) to encourage applicants to offer multiple supportive services.	7/5/2022	Chris Retan	Aletheia House
HOME-ARP			We applaud the efforts of AHFA to serve the QP of the state. To connect developers with service providers it would be helpful if the service providers publish a RFP for interested developers who could help meet the need of the QP they serve. The providers know the needs of the population they work with and the developers would then understand the type housing and resources the project would require.	8/5/2022	Phil Ellen	Paladin, Inc.

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME	IV	18	IV.C.10) 10) Applications submitted in other Participating Jurisdictions. We request AHFA consider state HOME loan applications from any applicant on a site located in a Participating Jurisdiction if a local HOME loan commitment from the Participating Jurisdiction is included in the AHFA application. Otherwise, the resources of the PJ cannot be utilized in the development or be a benefit to AHFA by using less state HOME or tax credit resources. This would allow for more combined funding sources and allow PJs to spend their HOME funds on adding new housing rather than on a few houses or supplementing other operating agency budgets so that housing is actually built. After meeting CHDO set aside requirements, it would help better utilize HOME funds to allow all applicants to be eligible due to the amount of resources needed to make projects financially feasible unless other provisions are taken.	8/9/2022	David Morrow	Morrow Realty
HOME	Point Scoring	A-10	iv (points for Responsible Owners who participated in the ERA Alabama program) and v (points for Property Management Companies that participated in the ERA program) unfairly disadvantages owners who provide housing to individuals who are elderly and disabled. Tenants who are elderly and receiving Social Security benefits and/or retirements benefits were less likely to have experienced an income loss due to COVID-19 and were therefore less likely to be eligible for ERA. Similarly, tenants who are disabled and receiving disability income payments were less likely to have experienced income loss due to COVID-19 and were therefore less likely to be eligible for ERA assistance. Landlords and property management companies that serve these populations were less likely to have 25% or more of their tenants who experienced a reduction in income and were ERA Alabama eligible. They should not be disadvantaged for providing housing to these vulnerable populations. This may also be a violation of the Fair Housing Act.	7/1/2022	Chris Retan	Aletheia House

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME	Point Scoring	A-10	iv (points for Responsible Owners who participated in the ERA Alabama program) and v (points for Property Management Companies that participated in the ERA program) unfairly disadvantages owners of properties in urban counties that had their own ERA funds. For example, property owners in the City of Birmingham would apply for City of Birmingham ERA funds, not ERA Alabama funds. It is unfair to penalize these property owners in urban comm unties for failing to secure ERA Alabama funds when they were not eligible to apply for these funds.	7/1/2022	Chris Retan	Aletheia House
HOME	Point Scoring	A-10	iv (points for Responsible Owners who participated in the ERA Alabama program) and v (points for Property Management Companies that participated in the ERA program) is generally unfair because it disadvantages property owners and management that had properties with lower numbers of ERA eligible tenants. For example, since applicants for ERA Alabama funds must have COVID-19 related losses, properties with tenants who practiced COVID safety precautions could have lower rates of COVID infection. These properties might not have 25% or more of their tenants that experienced COVID related losses. These landlords and property management companies should not be penalized for having lower COVID infection rates, and COVID related losses, among their tenants.	7/1/2022	Chris Retan	Aletheia House
HOME	Point Scoring	A-10	The points for developers participating in the ERA Alabama program is unfair to CHDOs that primarily work in urban counties since their projects could not apply for ERA Alabama funds. For example, we have three projects. One, which has 104 units, is in Center Point and those tenants would apply to Jefferson County ERA, not ERA Alabama, for funding. A second project, which has 42 units, is in Birmingham and those tenants would apply for Birmingham ERA, not ERA Alabama, for funding. Our third project, in Lincoln, has 42 units was eligible for ERA Alabama funds. We applied for ERA Alabama funds. However, 83% of our units are in urban communities that were not eligible to apply for ERA Alabama funding. This means we would not be eligible to earn points because our mission, as a CHDO, leads us to primarily serve urban communities. This is unfair and these points should be removed.	7/7/2022	Chris Retan	Aletheia House

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME	Point Scoring	A-10	A. 2.)(iv) a. and b. While the ERA program was and is extremely benificial for tenants impacted by COVID, no notice was given by AHFA that competitive points would be awarded on future appllciatons submitted by applicants whose tenant populations participated at the specified percentages. If AHFA wants to incentivise, rather than punish, developers and managers to deploy more resouces to assit tenants with ERA applications, it should do so prospectively rather than after the fact.	8/15/2022	Fred Bennett	Bennett & Company
HOME	Point Scoring	A-10	A.2.)(iv) a. and b. For those developers and management companies that worked tirelessly to assist residents affected by COVID with the ERA Program process, we feel this is more than fair to award participation points. AHFA urged all management companies to participate in this assistance program on several occassions. Those Companies that failed to participate did so by their own choice.	8/15/2022	Celeste Stewart	ASM
HOME	COVID Response	E1 - 3	We greatly appreciate and strongly support the plan to provide additional HOME funds to 2021 projects that are experiencing increased costs due to COVID-19 and/or supply chain issues. We would encourage AHFA not to penalize (or decline to prioritize) projects that do not have their pre-loan conference or construction loan closed when there has been a delay due to AHFA's inability to provide environmental clearance.	8/8/2022	Chris Retan	Aletheia House

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME and Housing Credit	Point Scoring	A-10	The proposed section of the draft QAP should be removed that rewards companies with additional points if they have had between 25-50% of residents participate in the Emergency Rental Assistance (ERA) program. First, the ERA program has been ongoing for more than a year. During that period, not one time did AHFA ever state in numerous verbal conversations, at the AAHA annual conference, memos, emails, notices, or any other correspondence that future LIHTC applications would be funded according to how many ERA applications that owners, developers, or management companies submitted. Secondly, the ERA program is not mandated by the Federal government, HUD, USDA, CDC, AHFA, or any agency. Instead, the program is encouraged for residents to participate, but the assistance is optional. For AHFA to require owners, developers, and management companies to participate in the program, much less to a certain level is not within the guidelines of a program that is not mandated. Managers and owners cannot force residents to participate in ERA. From our experience, we have had several residents who refused to participate. Owners, developers, and management companies should not be punished because residents choose not to apply for the assistance. Third, the tracking of ERA applications is a difficult task. While management personnel do assist residents with submitting ERA applications, residents can choose to submit applications on their own. Furthermore, there are several agencies, cities, etc. through which residents can directly apply for ERA. Being aware of every single application that is submitted for ERA and track the process of each one can be outside of an owner and management firm's control. In regards to the additional points being related to different owners, many properties have multiple owners, which is also a challenge for management firms to tally now many months later.	7/27/2022	Brain Hollyhand	Hollyhand Companies

Plan	Section	Page	Comment	Date Received	Commentor	Organization
			Fourth, another major issue with awarding points for ERA participation is the fact that an owner/management company with 5,000 units stands a much lower chance of receiving those extra points than a company with only 500 units. Assisting with the ERA application process takes a good deal of time. Submitting paperwork for 2,500 ERA applications compared to 125 applications is a huge difference. Fifth, owners and management companies that have properties with a large percentage of residents who already receive other rental assistance such as Section 8, Section 515, Project-Based Rental Assistance, and other types of subsidies would likely not have many residents participate and many may not be eligible. Therefore, owners/management firms that prioritized the ERA program, but have a more diverse base of residents who receive other forms of assistance would be penalized from receiving the extra points proposed in the QAP. These are five legitimate reasons why the proposed section of rewarding additional points according to ERA participation should be removed. Potential development of affordable housing in Alabama should not dependent upon the optional and voluntary ERA program.			

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	I	1	Among the Section 42 requirements listed in the three bullet points are preferences, including Projects in QCTs that contribute to a concerted community revitalization plan. After searching the QAP both through reading and electronically, I could find only one other place the revitalization concept is mentioned and that is the 7th tie-breaker in selection of applications for funding (Addendum A, page A-2). Providing points for Projects in QCTs that contribute to a concerted community revitaliztion plan would be a more meaningful way to encourage this type of development; short of that, moving the tie-breaker up ahead of tie-breakers that are not related to the three Section 42 preferences (lowest income, longest affordability period, and QCTs contributing to concerted community revitalization plans) would better address the Section 42 preference requirements. Rehabilitation involving existing buildings that qualify for the Alabama Historic Reahabiliation Tax Credit or Federal Historic Tax Credit qualify for 4 points under Project Type in Addendum A, page A-7 and are further granted an exception to the 2-Mile Radius Requirement, presumably because the historic nature of a Project is one of the slection criteria identified in Section I, page 1's discussion of Section 42 requirments for the QAP's selection criteria.	8/15/2022	Paula McDonald Rhodes	InVictus Development, LLC
Housing Credit	I	2	In Section A, reference is made to the State Consolidated Plan the following language from which is quoted: "the greatest concentration of need is observed in the rural counties located in the southern portion of the State, the Black Belt in particular." Please consider adding location points for Black Belt Projects as this would further the Section 42 selection criteria for ranking that include location, housing needs characteristics, and fulfillment of housing needs in a way that is specific to Alabama as reported in the State Consolidated Plan.	8/15/2022	Paula McDonald Rhodes	InVictus Development, LLC
Housing Credit	I	5	Scattered Sites – Many states allow for scattered site projects for both 4% and 9% applications. This hurts the ability for many old RD properties and public housing properties from being rehabilitated. AHFA should allow for scattered site rehab projects. The properties have already, in many cases, operated as one asset. Not allowing for scattered site projects provides few options in rehabilitating these types of properties which greatly need the LIHTC equity.	8/11/2022	AAHA	Alabama Affordable Housing Association
Housing Credit	I	5	Split-sites: requesting that AHFA re-consider “previously funded” split sites, separated by more than 1 city street, to be “grandfathered in” and allowed to apply again as 1 property.	8/15/2022	AAHA	Alabama Affordable Housing Association

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	II	11	II-C Status of Previously Funded Projects. Making it a threshold item for a project allocated tax credits in 2020 to be 75% complete on or before the 2023 application deadline date OF August 22, 2023, doesn't take into account the difficulites both AHFA and developers have had in securing the financial resouces needed for these projects to be feasible. Some have not yet begun construction in July, 2022. We suggest requring that all projecs that received an allocation of tax credits in 2018, 2019, and 2020, must have met the 10% test prior to submitting an application in the 2023 round. This is more appropriate, given the COVID-related cost issues, and still ensures the project is moving forward.	8/12/2022 8/15/2022	Jason Freeman Fred Bennett	Gateway Development Corporation Bennett & Company
Housing Credit	II	11 - 12	C.3) Status of Previously Funded Projects. If any application has a Responsible Owner that is also a Responsible Owner for a project that (i) received an initial allocation of Housing Credits in 2018, 2019 or 2020 and (ii) is not at least 75% complete as reflected by the project's most recent construction inspection report/progress report to AHFA on or before the date of application, the application is not eligible to receive an allocation of Housing Credits in the 2023 application cycle. Due to inflation and market pressures causing significant increases in construction costs and related items, several 2020 awarded projects did not close on equity and construction financing until late 2021/early 2022. Construction is now taking 15-18 months to complete due to rising costs and shortages in both labor and materials. We request that AHFA change "75% complete" to "50% complete" in this section.	8/9/2022	David Morrow	Morrow Realty
Housing Credit	II	11 - 12	AHFA should reconsider keeping the 75% completion in order to apply in the 2023 cycle. Particulary for projects that received an allocation in 2020. This is the year that COVID really started affecting construction costs, labor availabllitly, supply chain availability and other delays. Projects from 2020 were hit very hard with the construction cost inflation in particular and those projects are still trying to figure out how to makeup the gap. Having this restriction in the QAP for 2023 will cause many of Alabama's best and most experienced developers to not be able to submit needed projects. If some form of measurement needs to be in place for the properties, meeting the 10% carryover test would be more appropriate.	8/15/2022	Ann Marie Rowlett	Rowlett & Company, LLC

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	II	11 - 12	C.3) Status of Previously Funded Projects. If any application has a Responsible Owner that is also a Responsible Owner for a project that (i) received an initial allocation of Housing Credits in 2018, 2019 or 2020 and (ii) is not at least 75% complete as reflected by the project's most recent construction inspection report/progress report to AHFA on or before the date of application, the application is not eligible to receive an allocation of Housing Credits in the 2023 application cycle. Making it a threshold item for a project allocated tax credits in 2020 to be 75% complete on or before the 2023 application deadline date doesn't take into account the difficulites both AHFA and developers have had in securing the financial resources needed for these projects to be feasible. Due to inflation and market pressures causing significant increases in construction costs and related items, several 2020 awarded projects did not close on equity and construction financing until late 2021/mid 2022. Construction is now taking 15-18 months to complete due to rising costs and shortages in both labor and materials. We request that AHFA remove 2020 projects from this requirement.	8/15/2022	David Morrow	Morrow Realty
Housing Credit	II	14 - 15	C.14 Generally, an elderly project is not going to compete with a family project for tenants and vice versa. Please consider adding the following exception to the 2-Mile Radius Requirement: (vii) Applications proposing a different tenancy from the previously awarded project as long as the market study shows demand to support the proposed units.	8/9/2022	David Morrow	Morrow Realty
Housing Credit	II	15	Additional exception to 2 mile radius rule: "Applications for a competitive application to finance an adjoining phase of housing that represents the substantial replacement of previously existing multifamily housing that has been demolished and cleared within the last 5 years or will be demolished and cleared as certified by the chief executive officer of a jurisdiction and is funded with local HOME or CDBG funds."	8/15/2022	James Roberts	City of Mobile
				8/11/2022	William Stimpson	City of Mobile

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	II	15	15) Extended Use Period Qualified Contracts continue to offer a loophole for Housing Credit properties to convert to market rate. We strongly recommend that the AHFA incorporate a points incentive for waiving the right to a Qualified Contract for the duration of the extended use period of 35 years. Awarding points for the full waiver of the Qualified Contract will help to mitigate the premature loss of Housing Credit properties so that affordability is preserved. Suggested sample language to add in this section is as follows: '5 points will be given to projects that commit to waiving their right to the Qualified Contract option for 9 percent and 4 percent Housing Credits for the duration of the extended use period of 35 years.'	8/15/2022	Kandice Allen Mitchell	Enterprise Community Partners
Housing Credit	II	15	Under II.C.14 Site Location - Consider an exception to the 2-mile Radius Requirement for an application for Multifamily Housing Revenue Bonds submitted on a site that is contiguous to a previously funded application that has like tenant base and the same responsible owner. A previously AHFA funded tax credit development that is still in the pre-construction phase has additional usable land that could support up to 45 additional low-income units. With market study support those units could be added using Multifamily Housing Revenue Bonds and cost sharing strategies could be implemented during construction.	8/15/2022	AAHA	Alabama Affordable Housing Association
				8/15/2022	Amanda Slaton	Vantage Development
Housing Credit	II	17	Given the continued uncertainty of the cost environment and supply chain issues related to construction, we suggest AHFA amend II(D)(4) to allow for changes in unit design, etc…with written consent of AHFA during the application period. It should not be assumed that AHFA will or should provide consent but we feel it is appropriate that AHFA have the flexiblity to do so and allow for some value engineering at the application phase if warranted, at least during this inflationary environment.	8/4/2022	Thom Amdur	Lincoln Avenue Capital
Housing Credit	II	19	We urge AHFA to reconsider its minimum debt service coverage ratio for housing credit properties from 1.20:1 to 1.15:1. As interest rates continue to rise, we have less debt proceeds to address the continued rise in construction costs. Since many permanent lenders have debt products for affordable housign that sets a minimum DSC at 1.15:1 we believe changing the DSC will allow developers to fill some project gaps with additional permanent financing.	8/4/2022	Thom Amdur	Lincoln Avenue Capital

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	II	21	The compelling financial attribute of the 4 percent LIHTC program is the “as of right” credits that come with meeting the IRC Section 142 requirements along with meeting the threshold requirements set forth in AHFA's QAP. While Private Activity Bond (PAB volume cap is a limited resource, the credits associated with TEB transactions are only limited underwriting and the amount of eligible basis. This is a significant difference from the 9 percent LIHTC program where the allocation of annual credit authority is capped. The IRS permits the inclusion of developer fees in eligible basis because these fees serve as the primary form of compensation for LIHTC developers. They pay for overhead of essential functions, including accounting, human resources, information technology, asset management, insurance and legal fees and many others. Developer fees also serve as the primary form of reimbursement for pre-development costs and resident services and are a de-facto construction contingency, much drawn on today as construction costs skyrocket. It is critical that developer fees are sized appropriately, and they take into account the variable risk of different types of affordable housing transactions. As it relates to 9 percent transactions, we believe a 15 percent developer fee is appropriate; however, we recommend AHFA allow for an alternative developer fee structure for projects financed with Tax Exempt Bonds and 4 percent LIHTCs. A tiered approach balances the need to conserve the limited and competitive 9 percent resource while acknowledging the challenges and risks of developing smaller scaled projects. Specifically, we recommend AHFA allow for up to a 25 percent developer fee on New Construction, Rehabilitation and Acquisitions. The risk and financing profile of these transactions warrant a different treatment. Developers take on more risk on large bond deals because of the extended pre-development period and the high proportion of foreclosable debt, for which the developer is ultimately responsible. The developer fee compensates developers for these risks. The additional eligible basis generated by the increased fee will also generate more tax credit equity which will help offset reduced debt proceed brought on by rising interest rates and help plug gaps brought on by rising construction costs. Unlike 9 percent transactions, the additional eligible basis generated by increase fee will not deplete the overall supply of 4 percent credits, which as described above are “as of right” and uncapped. Maximizing developer fees, within the constraints of the tax law, regulation and reasonable underwriting, is a proven and successful method of generating additional LIHTC equity proceeds and filling project gaps. It is proven strategy that has been deployed of late by many of AHFA peer HFAs in the region including Kentucky, Oklahoma, Ohio, and Tennessee, all of which have developer fees for bond transactions ranging between 20 and 25 percent. If AHFA finds it desirable, it could also require developers to defer any fee above the current 15 percent. If it would be helpful, we would be happy to share some case examples of the impact of this policy on some of our projects in the region.	8/4/2022	Thom Amdur	Lincoln Avenue Capital

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	II	22	G.2)(i) We request that subparagraph (i) be revised as follows: “(i) The applicant is applying for HOME funds, has requested and increase in Eligible Basis, and has requested that AHFA provide both the first and second mortgage loans; or” With construction costs remaining high, most projects need an increase in Eligible Basis to be financially feasible, whether AHFA provides both the first and second mortgage loans or only the second mortgage loan. This is especially true for rural projects with lower rents that cannot afford a large amount of debt service. By allowing the applicant to request the increase in Eligible Basis at application, the applicant would be better able to present a true picture of the financial structure of the deal to AHFA. The increase in basis is needed to add additional credits to make it financially feasible up front in application as it requires more resources due to overall increased costs so it is requested AHFA to increase the 100% basis of the computed credits and up to 130%. basis boost for projects. We also request that AHFA make the determination on increase in Eligible Basis at the time of allocation of credits to the project and reserve the right to adjust the increase prior to construction loan closing to make the project financially feasible.	8/9/2022	David Morrow	Morrow Realty
Housing Credit	II	22	G. Housing Credit Allocations. 2) Nine-Percent Credit, (i) - Current QAP draft states that in order for a project to receive an increase in Eligible Basis "the applicant is applying for HOME Funds, and AHFA is providing both the first and second mortgage loans". In an attempt to secure alternative financing structures to offset the extreme cost overruns, AHFA staff should be given the flexibility to allow for the amortizing first to be added to the soft second in order to receive and increase in Eligible Basis.	8/11/2022 8/12/2022	AAHA Jason Freeman	Alabama Affordable Housing Association Gateway Development Corporation

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	II	22	G. Housing Credit Allocations, 2) Nine-Percent Credit - Current QAP draft states that "AHFA may designate one or more buildings in a project to receive an increase in Eligible Basis…". Add language to QAP that clarifies specifically when that designation will be made, e.g., AHFA may designate one or more buildings in a project to receive in increase in Eligible Basis prior to construction loan closing or at cost certification in order to be financially feasible as part of a Qualified Affordable Housing Project and shall be treated as located in a Difficult Development Area.	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation
Housing Credit	II	22	The Current QAP allows for the Owner to elect for AHFA to re-underwrite the project to split the HOME funds requested into an amortizing 1st mortgage HOME loan and soft second HOME loan and receive additional credits via the discretionary basis boost. Not knowing how the HOME funds requested will be split between the 1st and second mortgage loans or how many additional credits may be received makes underwriting difficult. Is there some way for AHFA could make it easier to structure the amortizing HOME loan on the front end such as based on DSCR and requesting credits based on the 130% basis boost and fill in the balance with a soft second HOME loan? This will allow AHFA to receive HOME funds back faster and allowing AHFA to re-deploy the funds?	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation
Housing Credit	I	25	Section I.3 Progress Requirements After Reservation states that a 2023 project must place in service by Decem	8/12/2022	Mary Ellen Judah	Neighborhood Concepts, Inc.
Housing Credit	II		Priority for 2023 credits should be given to shovel ready projects. For example, projects where the land is already owned, or leased, by the partnership. Projects which have additional subsidy which makes the project more feasible. Project that are a second phase of an existing development should have a priority.	8/15/2022	Judy Van Dyke	Vizion Driven Communities, LLC
				8/15/2022	Jonathan Toppen	Tapestry Development Group, Inc.

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A	Energy/Water Conservation and Healthy Living Environments section -- Recommend awarding all eight points to developments that commit to certifying undering a third-party verified green building program, such as: EarthCraft, Energy Star, Enterprise Green Communities, or National Green Building Standard (NGBS). Our firm conducted an internal analysis of failures noted in QAP projects in Georgia between 2016-2019 and found that 100% of surveyed projects failed not only QAP requirements for the bonus points, but also several energy code-required items during our inspections -- which they were then required to remedy before construction completion. Green certification gives the added assurance that QAP measures are being implemented, and that tax payers' dollars are spent on quality residential housing.	8/15/2022	Abe Kruger	SK Collaborative
Housing Credit	Point Scoring	A-1	Addendum A states in its second paragraph that the point scoring system "will allow AHFA to award points to projects that best meet the identified housing priorities of the Sate of Alabama." While that is certainly the intent and aim, the Project that is best able to meet the State's identified housing priorities may not be the highest scoring, or may be tied but cannot meet the tie-breaker requirements.	8/15/2022	Paula McDonald Rhodes	InVictus Development, LLC

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-1	Multiple projects should be allowed in counties with disaster area designations.	8/15/2022	James Roberts	City of Mobile
				8/11/2022	William Stimpson	City of Mobile
Housing Credit	Point Scoring	A-1	A.2.)(iv) a. and b. For those developers and management companies that worked tirelessly to assist residents affected by COVID with the ERA Program process, we feel this is more than fair to award participation points. AHFA urged all management companies to participate in this assistance program on several occassions. Those Companies that failed to participate did so by their own choice.	8/15/2022	Celeste Stewart	ASM
Housing Credit	Point Scoring	A- A1	Rehabilitation Projects -- recommend adding performance targets or specific design standards for each item. For example: - Kitchen cabinets and countertops (or other wood products) must be CARB 2 compliant. - Plumbing fixtures must be WaterSense certified. Toilets must be 1.28 GPF or less, kitchen faucets must be 2 GPM or less, etc. - Paint must have a Volatile Organic Compound (VOC) content of 50 g/l or less; applied floor finishes can have a VOC content of 100 g/l maximum. Recommend also incentivizing whole building energy efficiency improvements, such as building envelope and duct air sealing, which can be measured pre- and post-renovation. While new construction developments must meet the requirements of Alabama's energy code, renovation projects are not required to complete duct or blower door air leakage testing. For example, states such as Georgia require specific air leakage reduction targets -- either meeting building code or achieving a minimum of 20% reduction in air leakage, as verified by a third-party, qualified professional. .	8/15/2022	Abe Kruger	SK Collaborative

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-2	The first tie-breaker should be one that furthers the intent of both Section 42 and the State Consolidated Plan (SCP); giving a preference to applications where a Related Owner registered by 8/1/2022 and is participating in the ERA Bulk Steamlined Application Program for AHFA-Funded Projects does not further the objectives of either Section 42 or the SCP. In addtion, it comes ahead of a number of tie-breakers that do further these objectives; for example, tie-breakers 7 and 8 address items specifically covered in the discussion of Section 42's requirements in Section 1, page 1. In addition, registration by 8/1/2022 for the ERA Bulk Streamlined Application Program creates problems for management companies and owners who were quick to request emergency rental assistance and had been operating under the then existing system for many months before the Bulk Program was available. For those early adopters, most of the tenants under management are close to reaching the 18 month limit. It is also a burden for the tenants because they have to resubmit information and because the Bulk program does not cover utility payments, properties and residents operating under the original system will have to obtain assistance from two programs rather than one, which leads to confusion and frustration on the part of the tenants. Please remove this as a tie-breaker or at least modify it to put early adopters on equal footing with those utilizing the Bulk Program.	8/15/2022	Paula McDonald Rhodes	InVictus Development, LLC
Housing Credit	Point Scoring	A-2	Tiebreaker #2 2. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application submitted by a Responsible Owner that did not exchange or received an additional allocation of Housing Credits or HOME funds on a prior-funded 2018, 2019, or 2020 AHFA Project. We applaud AHFA for recognizing the impact the COVID-19 pandemic had on 2018, 2019, and 2020 projects by allowing those projects to request an additional allocation of Housing Credits and/or an exchange of their current Housing Credits for 2022 Housing Credits. The Responsible Owners of those projects should not be penalized in the 2023 cycle tiebreaker. We request that this tiebreaker be removed.	8/9/2022	David Morrow	Morrow Realty

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-2	Tiebreaker Language: In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application that has a Related Owner that registered, by August 1, 2022, and is participating in the Emergency Rental Assistance Bulk Streamlined Application Program for AHFA-Funded Projects. Comment: The first Tie-Breaker requires an action be taken by a Related Owner before August 1st, 2022. However, the Draft Qualified Allocation Plan was not published until August 4th, 2022.	8/15/2022	Paul Robinson	Sepia Transformation Partners
Housing Credit	Point Scoring	A-3	The paragraph immediately following tie-breaker 10 provides that "AHFA may recommend that a Housing Credit allocation be made irrespective of the ranking order established by the Point Scoring System based on the amount of Housing Credit allocation needed relative to the amount of allocation available for the project to be financially feasible." Please consider amending this language to reserve the right to make an allocation, irrespective of the Point Scoring System's ranking order, to a Project that best furthers the objectives of Section 42 and the State Consolidated Plan, but would not otherwise receive funding under the QAP. As an example the State of Georgia awards one project of their own choosing each year, independent of the scoring/ranking system they have established. The Georgia DCA's QAP contains the following "General Set Aside": "DCA may award up to $1,000,000 of 9% Credits to an Application it determines will further its mission, goals, initiatives, set asides and/or priorities, irrespective of the ranking by the evaluation factors. The designation of the General Set Aside may be made either during Application review or within 45 days of the announcement of awards. This set aside, which is descretionary and need not be exercised in every application cycle, allows DCA to make up for the fact that any set of criteria, preferences, and scoring cannot capture a very deserving Project that should be done. AHFA should consider adopting this approach.	8/15/2022	Paula McDonald Rhodes	InVictus Development, LLC

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-5	If a rehabilitation project selects to replace the HVAC systems and install 15 SEER, 9 HSPF equipment, are they eligible for both the 2 points offered under Rehabilitation Projects Only and the 3 points offered under Energy/Water Conservation and Healthy living? Is there an age requirement on the equipment that is being replaced to be eligible for the Rehabilitation Projects points (such as equipment must be 10 years or older?). Southface suggests including that a simple payback analysis of operation costs be performed as part of the Capitol Needs Assessment.	8/12/2022	Amelia Godfrey and Alyson Laura	Southface Institute
Housing Credit	Point Scoring	A-5	The points assigned to the four options available under Rehabilitation Projects Only appear arbitrary. Can AHFA provide clarity on the way that the different point allocations have been determined? The industry standard is to weigh points available by operational efficiency improvement and reduced environmental impact. Additionally, the four options listed here do not provide an incentive for Rehabilitation Projects to invest in whole building energy efficiency, such as quantifiable whole-building air sealing or HVAC duct sealing. While new construction developments must meet the requirements of Alabama's energy code, rehabilitations are not required to complete blower door testing or duct leakage testing. In order to incentivize projects to complete wholistic energy efficiency, it is suggested to add additional points for air sealing and duct sealing. An example of this could be to award 3 points for achieving a minimum of 20% reduction in residential air leakage, as verified through blower door testing conducted by a third-party, qualified professional. As well as award 3 separate points for achieving a minimum of 20% reduction in HVAC duct leakage to the outdoors, as verified though duct leakage testing completed by a third-party, qualified professional. These two strategies should be valued the highest of all the options.	8/12/2022	Amelia Godfrey and Alyson Laura	Southface Institute

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-5	The Energy/Water Conservation and Healthy Living Environments section disincentivizes projects from comprehensively investing in the full range of efficiency and/or occupant health measures that are available on the market today. A more impactful way to reward projects for investing in energy/water efficiency and healthy indoor environments would be to award a full 8 points to projects that commit to achieving a comprehensive green building certification, including EarthCraft, Energy Star, Enterprise Green Communities, LEED green building certification, or National Green Building Standard. As an alternative to our suggestion above, can AHFA provide clarity on the way that the different point allocations have been determined? For example, is there a formula that is used to award points to these seven (7) options that takes into account the costs and benefits of each measure? Additionally, can clarification be provided on which benefits (overall energy efficiency, utility savings, occupant wellness, etc.) infuence the point allocation?	8/12/2022	Amelia Godfrey and Alyson Laura	Southface Institute
Housing Credit	Point Scoring	A-5	Please note that Energy Star has discontinued their program for rating/certifying roofing products. https://coolroofs.org/news/energy-star-roofing-program-sunsets It can be replaced with the technical specifications from the Energy Star qualifying criteria as follows: ‘Low-sloped roof have 65% or higher initial solar reflectance, and steep sloped roofs have 25% or higher initial solar reflectance,’ and/or the LEED qualifying criteria that states, ‘Low-sloped roof have an initial SRI value of 82 (aged SRI value 64), and steep sloped roofs have an initial SRI value of 39 (aged SRI value 32).’	8/12/2022	Amelia Godfrey and Alyson Laura	Southface Institute

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-5	The U.S. Green Building Council (USGBC) commends AHFA for including points for projects that include energy efficiency measures in the 2023 draft QAP. In addition, USGBC respectfully requests that AHFA offer competitive points for new construction and renovation projects that certify to the current version of either Leadership in Energy & Environmental Design (LEED), EarthCraft, Enterprise Green Communities, or NGBS Green. Sample language to add in this section is as follows: A.Points Gained 1.Project Characteristics New section (ii) Green Building Certification 10 points will be given for the following (New Construction and Rehabilitation): Projects certified by a qualified third-party verifier according to the most current version of one of the following criteria: •Leadership in Energy & Environmental Design (LEED); •EarthCraft; •Enterprise Green Communities; or •National Green Building Standard (NGBS) Justification: High-performance building certification systems take a holistic view to whole-building performance that includes materials resource efficiency, location, access to transportation, and more. Incentivizing the use of third-party building certification programs is consistent with providing options to meet the 'energy efficiency' selection criteria listed in 'Section I. Housing Credits'. We acknowledge that AHFA, like many state housing finance agencies, wants to minimize up-front development costs associated with housing credits. High-performance building rating and certification systems help ensure that projects funded by housing credits not only create new housing opportunities but benefits residents through savings on energy and water bills – addressing one of the perpetual barriers to affordability – as well as indoor environmental quality and occupant comfort. Currently, 39 state/local housing finance agencies have determined that whole building energy and green building programs are a prudent use of Housing Credits and have included them in their QAPs.	8/15/2022	Rebecca Price	US Green Building Council

Plan	Section	Page	Comment	Date Received	Commentor	Organization
			Offering the additional option of high-performance building certification to developers provides the flexibility to choose the best path for their project to meet their design goals and financing requirements, as well as satisfying residents' needs and priorities. With awards generally limited to one project per county, adding a certification incentive would also provide developers another avenue towards a competitive bid and contribute to promoting equity in low-income, disadvantaged communities. The Alabama development community is equipped to implement holistic green building requirements. Statewide, there are nearly 1,000 ENERGY STAR single-family homes and apartments. There are also over 200 multifamily buildings that have been certified to green building standards. Thank you for the consideration of these comments. We welcome the opportunity to discuss these recommendations and third-party programs further with you or your staff and will gladly provide any supplemental information that may be beneficial.			

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-6	(iii) Rent Affordability (a) New Funds (1) The Section 108 Loan Guarantee Program (Section 108) is a HUD-approved loan guarantee component of the Community Development Block Grant (CDBG) Program. Section 108 provides CDBG entitlement communities with low-cost, flexible financing for economic development, housing rehabilitation, public facilities, and other physical infrastructure projects. Since CDBG funds are an approved AHFA funding source, AHFA should consider including Section 108 as an approved source of new funds since the program is a component of the CDBG program. The City of Auburn is a CDBG entitlement community and offers the Section 108 program to fund housing and community development activities. LIHTC redevlopment is an eligible CDBG activity and supports the low-to-moderate-income HUD national objective coupled with addressing the City's 5-year Consolidated Plan of addressing affordable housing in Auburn. The Ridgecrest community was part of the AHA's RAD public housing conversion. AHA proposes to redevelop the site to transform the Ridgecrest community to eliminate the stigma associated with public housing/RAD units coupled with the ongoing redevelopment in the surrounding area. Categorizing the Section 108 loan as an approved source of new funds would allow the City of Auburn and the AHA the opportunity to transform the Ridgecrest housing community benefiting low-income families and the Auburn community as a whole. We respectfully ask that AHFA include the Section 108 program as an allowable subset of approved funds CDBG and that it is allowed to receive 2-5 points based on the same per unit scoring criteria as the other subsidy programs. Public Housing Authorities (PHAs) that have converted their public housing portfolio to site-based Section 8/project-based vouchers (PBV) or project-based rental assistance (PBRA) as part of HUD's Rental Assistance Demonstration (RAD) no longer receives Capital Fund Program (CFP) and Replacement Housing Factor Funds (RHFF) in a traditional sense. Upon closing RAD transactions, AHA's CFP and RHFF balances were drawn from HUD and deposited in its Replacement for Reserve account. The current point structure seems to penalize PHAs that have converted to RAD PBV or PBRA. Upon RAD conversion, PHA's operating subsidy and CFP funding were combined and termed as a housing assistance	7/27/2022	Sharon Tolbert	Auburn Housing Authority

Plan	Section	Page	Comment	Date Received	Commentor	Organization
			payment (HAP) which is now funded through a PHA's Housing Choice Voucher (HCV/Section 8 Program). Based on this information, AHFA should consider CFP and RHFF funds drawn as a part of a PHA's RAD PBV or PBRA conversion as "New Funds" to make the scoring equitable for all PHAs whether they operate traditional public housing, RAD PBV or RAD PBRA.			
Housing Credit	Point Scoring	A-7	(iv) Tenant Needs (d) AHFA needs to clarify that "targeting" households on the public housing waitlist includes PHA-funded properties to include traditional public housing and public housing units converted to site-based Section 8/RAD PBV or PBRA.	7/27/2022	Sharon Tolbert	Auburn Housing Authority

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-7	(v.) Tenant Needs (c) 2 points will be given to projects that set-aside a minimum of 7% of the total proposed units for tenants with disabilities or homeless populations. We request that AHFA return the set-aside to 5% for disabled or homeless populations. Underwriting is already difficult with rising operating costs so decreasing or holding to the 5% is needed and keeps housing the disabled with stigmatizing.	8/9/2022	David Morrow	Morrow Realty
Housing Credit	Point Scoring	A-7	Tenant Needs - Request to return set-aside to 5% for disabled or homeless populations. NOTE: Often the historical 5% set-aside is not being filled by disabled or homeless populations due to a lack of demand.	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation
Housing Credit	Point Scoring	A-8	(vi) Location (a) (2) Census Tract Location AHFA should consider automatically granting Public Housing Authority sites maximum points in this category. It's to be understood the public policy rationale for wanting affordable housing properties to be in better neighborhoods so there is a mix of incomes and we are not concentrating poverty, but with PHA sites we don't have the luxury of moving these sites to higher income census tracts. This puts these sites at an unfair disadvantage compared to other projects that have the luxury of choosing their perfect scoring sites when these properties are in dire need of redevelopment. We ask that existing PHA sites automatically get the max points in this category.	7/27/2022	Sharon Tolbert	Auburn Housing Authority
Housing Credit	Point Scoring	A-8	(2.) Census Tract Location (Maximum 4 points) Maintaining the maximum points at income percentages of 100% or more is preferable until other scoring criteria can be added to prevent a lot more ties.	8/9/2022	David Morrow	Morrow Realty

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-8	AHFA to consider reducing the wide range of Census Tract Median Income Points, instead of having this category broader as is found in the 2022 QAP. Even with income averaging, we are serving people at or below 80% and most are far less than 80%. However, there are 3 categories where more points are given on a scale for these numbers to be above 80%. Maximum points should stop at 80% or at most 90%. It is clear that seeking sites in Census Tracts above 100% generally leads to much higher land costs, adding to the burden of projects which are already facing tremendous challenges related to costs of construction and operation. One suggestion for points would be to provide additional value to projects that partner and work within a local municipality's comprehensive community housing/development plan or points for job opportunities within the community.	8/11/2022	AAHA	Alabama Affordable Housing Association
Housing Credit	Point Scoring	A-8	Under the point category for "Census Tract Location", consider changing the category description from "given to a project located in a Census Tract…" to "given to a project located in an area of opportunity, defined as Census Tract…" The FHFA reviews a state's QAP to determine if there are additional high opportunity areas within the state outside of Difficult to Develop Areas. AHFA's Census Tract Location category possibly meets the FHFA definition of high opportunity areas, but by not referring to it as an area of opportunity, the eligible census tracts are not included. By making this minor change in wording, the number of Alabama census tracts designated as high opportunity areas should greatly increase, making them eligible for additional capital resources.	8/15/2022	AAHA	Alabama Affordable Housing Association

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-8	Section A.1.vi.a.2 of Addendum A, "Census Tract Location," uses FFIEC's 2020 Estimate Tract Median Family income in comparison to 2022 County Median Family Income, as published by HUD, to calculate a percentage of the median income for a census tract. Using 2020 numbers and the now elevated income levels in a majority of Alabama counties in 2022, a large number of census tracts no longer qualify for the 4 points based on being 100% or more over income. While furthering deconcentration of poverty is worthy in the sense that poorer areas generally do not have access to the same infrastructure and benefits as wealthier areas and there are sociological benefits to lower income families when exposed to higher income families, there are also negative impacts. Incentivizing construction of affordable housing in higher income areas often increases the cost of land, increases the cost of construction, directs much needed housing away from lower income areas, and causes families in desperate need of safe, decent, affordable housing to move outside the neighborhood where they have a support system of family and friends, churches and nonprofit organizations, and government services geared toward lower income populations. The QAP and its Point Scoring System already ensure that sites will be appropriate based on other location criteria (both positive and negative). There are a number of counties in Alabama that do not have any census tracts with median family incomes that are 100% or more of the county's median family income. Affordable housing being built in higher income areas forces lower income individuals away from the areas where they live, their family unit, and potentially their current job. The Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project, Inc., U.S. Supreme Court 2015 case, which formed the basis for state allocating agencies' efforts to direct affordable housing into higher income areas, was remanded to the lower court where it was resolved in favor of the Texas allocating agency because the plaintiff failed to demonstrate that the agency's policies caused the disparate impact of which Inclusive Communities Project complained. AHFA is one of the few remaining agencies using a tract's income level as a scoring criterion for allocating Housing Credits. Please consider removing Census Tract Location as a point scoring item. Doing so would open up many more locations for affordable housing throughout the state and help put affordable housing where the need is greatest.	8/15/2022	Paula McDonald Rhodes	InVictus Development, LLC

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-8	Expand the "Census Tract Location" category to more broadly consider areas of economic opportunity and make more points available. Other metrics could include low rates of poverty, unemployment rates below the state average, high rates of new job hires, high population growth, and/or high rated school districts (if proposing a family development).	8/15/2022	Kristina Stone	United Bank
Housing Credit	Point Scoring	A-8	Eliminate census tract points. See attached letter. Increasing points to 4 for higher tracts largely eliminates lower income tracts from consideration and raises fair housing questions.	8/15/2022	James Roberts	City of Mobile
				8/11/2022	William Stimpson	City of Mobile
Housing Credit	Point Scoring	A-8	A.1.) (vi)(a)(1) 2 points will be given for each of the following neighborhood services located within .3 miles of the site. We assume that the period in front of 3 miles shown above is a typo. Please reinstate points for Neighborhood Services within 3 miles, rather than .3 miles.	8/15/2022	David Morrow	Morrow Realty
Housing Credit	Point Scoring	A-8	A.1.) (vi)(a)(1) Reinstate points for Neighborhood Services within 3 miles, rather than .3 miles (this may have been a typo)	8/15/2022	Fred Bennett	Bennett & Company
				8/12/2022	Jason Freeman	Gateway Development Corporation

Plan	Section	Page	Comment	Date Received	Commentor	Organization
HOME and Housing Credit QAP	Point Scoring	A-10	The proposed section of the draft QAP should be removed that rewards companies with additional points if they have had between 25-50% of residents participate in the Emergency Rental Assistance (ERA) program. First, the ERA program has been ongoing for more than a year. During that period, not one time did AHFA ever state in numerous verbal conversations, at the AAHA annual conference, memos, emails, notices, or any other correspondence that future LIHTC applications would be funded according to how many ERA applications that owners, developers, or management companies submitted. Secondly, the ERA program is not mandated by the Federal government, HUD, USDA, CDC, AHFA, or any agency. Instead, the program is encouraged for residents to participate, but the assistance is optional. For AHFA to require owners, developers, and management companies to participate in the program, much less to a certain level is not within the guidelines of a program that is not mandated. Managers and owners cannot force residents to participate in ERA. From our experience, we have had several residents who refused to participate. Owners, developers, and management companies should not be punished because residents choose not to apply for the assistance. Third, the tracking of ERA applications is a difficult task. While management personnel do assist residents with submitting ERA applications, residents can choose to submit applications on their own. Furthermore, there are several agencies, cities, etc. through which residents can directly apply for ERA. Being aware of every single application that is submitted for ERA and track the process of each one can be outside of an owner and management firm's control. In regards to the additional points being related to different owners, many properties have multiple owners, which is also a challenge for management firms to tally now many months later.	7/27/2022	Brain Hollyhand	Hollyhand Companies

Plan	Section	Page	Comment	Date Received	Commentor	Organization
			Fourth, another major issue with awarding points for ERA participation is the fact that an owner/management company with 5,000 units stands a much lower chance of receiving those extra points than a company with only 500 units. Assisting with the ERA application process takes a good deal of time. Submitting paperwork for 2,500 ERA applications compared to 125 applications is a huge difference. Fifth, owners and management companies that have properties with a large percentage of residents who already receive other rental assistance such as Section 8, Section 515, Project-Based Rental Assistance, and other types of subsidies would likely not have many residents participate and many may not be eligible. Therefore, owners/management firms that prioritized the ERA program, but have a more diverse base of residents who receive other forms of assistance would be penalized from receiving the extra points proposed in the QAP. These are five legitimate reasons why the proposed section of rewarding additional points according to ERA participation should be removed. Potential development of affordable housing in Alabama should not dependent upon the optional and voluntary ERA program.			
Housing Credit	Point Scoring	A-10	Allocation Selection As the Chairperson of the RAD Committee of the Alabama Association of Housing & Redevelopment Authorities, [(AAHRA) Alabama's Public Housing Authority state organization], AAHRA believes AHFA should consider a 10% annual cap set aside for the redevelopment of existing Public Housing Authority (PHA) properties with an in-place Declaration of Trust or RAD Use Agreement. These properties are scattered throughout the state and are in most cases 50+ years old and in desperate need of substantial rehabilitation or complete redevelopment (demolish/rebuild). Our communities and residents deserve an ongoing funding preference in Alabama. In addition, PHAs are the primary source of affordable rental housing in the state.	7/27/2022	Sharon Tolbert	Auburn Housing Authority

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-10	A. 2.)(v) a. and b. While the ERA program was and is extremely benificial for tenants impacted by COVID, no notice was given by AHFA that competitive points would be awarded on future appllciatons submitted by applicants under contract with property management companies whose tenant populations participated at the specified percentages. If AHFA wants to incentivise, rather than punish, developers and managers to deploy more resouces to assit tenants with ERA applications, it should do so prospectively rather than after the fact..	8/15/2022	Fred Bennett	Bennett & Company
Housing Credit	Point Scoring	A-10	Regarding paragraph A. 2). (iv), we believe the understandable goal of rewarding responsible owners who utilized ERA may have the unintended consequence of penalizing owners who were unable to utilize ERA to the extent described here because their tenants received federally subsidized rental assistance from other government agencies, particularly USDA, Rural Development ("RD"). In addition to the funds provided to ERA, the federal government provided additional emergency rental assistance subsidies to tenants housed in RD properties through the American Rescue Plan Act of 2021. For owners who utilized those funds to aid tenants in their RD projects, the need for ERA funds was greatly diminished, in most every case below the threshold required for points in this section. We believe this unintended penalty can be corrected by revising this paragraph to reward responsible owners who "Participated in any federally funded rental assistance programs, including ERA Alabama, as follows…," and by make similar changes to the subparagraphs therein.	8/12/2022	Rodney Corley	ARD, Inc.

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-10	A. 2.)(iv) a. and b. While the ERA program was and is extremely benificial for tenants impacted by COVID, no notice was given by AHFA that competitive points would be awarded on future appllciatons submitted by applicants whose tenant populations participated at the specified percentages. If AHFA wants to incentivise, rather than punish, developers and managers to deploy more resouces to assit tenants with ERA applications, it should do so prospectively rather than after the fact. IF the points for ERA remain in the QAP, the language should be changed from "secured funding" to applied for ERA funding". There are many barriers to actually receiving the ERA funding.	8/12/2022	Jason Freeman	Gateway Development Corporation
Housing Credit	Point Scoring	A-10	Under the Applicant Characteristics, section (i), we suggest a point differentiation be given to those who are receiving points under minorities or women having ownership in the Ownership Entity or any Responsible Owner vs. businesses in which an applicant guarantees at least 10% of the total business cost awarded to a minority – or women owned business. We believe a minority or women owned business in the Ownership Entity is a greater threshold and will have greater impact in furthering the participation of minorities and women in the affordable housing industry. Therefore, we suggest AHFA consider providing 6 points to a minority or women owned ownership in the Ownership Entity. We suggest that 5 points be awarded if an applicant guarantees at least 10% of the total business cost awarded to a minority – or women owned business, which includes but are not limited to, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services.	8/15/2022	Paul Robinson	Sepia Transformation Partners

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A 10-11	Thank you for the opportunity to comment on the 2023 QAP. Please clarify how AHFA will calculate the % used for points for participation in the ERA by the Owner and Management Agent. Specifically, what is included in the denominator for the calculation. Please consider the following questions: 1. Should all units, including conventionally financed units, be included in the denominator? 2. Should units that already have some other kind of rental assistance (USDA RA, HUD, Section 8, Vouchers, Certificates) be included? 3. Should only LIHTC projects be included? 4. As an example, if an Owner owns 1,000 tax credit units (20 projects) and she participated in the ERA program with 400 tenants (across all 20 properties) receiving ERA, then would she only receive 3 points (i.e. 400/1000=40%). 5. What is the date that our final calculations need to be determined? Do we have until the end of Dec.? 6. What is the actual start date we need to use? Can we include rental assistance from 2019/2020/etc.? 7. Can we count a unit for each time that unit got assistance? For instance, if a particular unit got ERA funds on three occasions, can we count it three times? These same questions apply to the Management Agent points for participation in the ERA Program. If AHFA will utilize some kind of application form for determination of awarding points, it would be helpful if AHFA could provide a draft of such form or required evidence in advance of the application cycle.	8/11/2022	Amy Montgomery	Hall Housing Group

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-11	Regarding paragraph A. 2). (v), we believe the understandable goal of rewarding AHFA Property Management Companies who utilized ERA may have the unintended consequence of penalizing managers who were unable to utilize ERA to the extent described here because their tenants received federally subsidized rental assistance from other government agencies, particularly USDA, Rural Development ("RD"). In addition to the funds provided to ERA, the federal government provided additional emergency rental assistance subsidies to tenants housed in RD properties through the American Rescue Plan Act of 2021. For managers who utilized those funds to aid tenants in their RD projects, the need for ERA funds was greatly diminished, in most every case below the threshold required for points in this section. We believe this unintended penalty can be corrected by revising this paragraph to reward AHFA Property Management Companies who "Participated in any federally funded rental assistance programs, including ERA Alabama, as follows…," and by making similar changes to the subparagraphs therein.	8/12/2022	Rodney Corley	ARD, Inc.

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-11	In addition to the suite of energy efficiency incentives in the current QAP, we respectfully request that AHFA offer competitive points for new construction and renovation projects that certify to the current version of EarthCraft, Enterprise Green Communities, LEED, or NGBS Green. Suggested sample language to add in this section is as follows: A.Points Gained 1.Project Characteristics New section (ii) Green Building Certification 10 points will be given for the following (New Construction and Rehabilitation): Projects certified by a qualified third-party verifier according to the most current version of one of the following criteria: •EarthCraft; •Enterprise Green Communities; •Leadership in Energy and Environmental Design (LEED); or •National Green Building Standard (NGBS) Reasoning: Incentivizing the use of green building certification programs is consistent with providing options to meet the ‘energy efficiency’ selection criteria listed in ‘Section I. Housing Credits’. Providing incentives within the Housing Credit program that can also be used to favorably impact capital stacks - such as a green certification, which is part of the qualifications for the HUD MIP program – furthers AHFA’s goal of encouraging and promoting investment in affordable rental housing for low-income households.	8/15/2022 8/15/2022	Kandice Allen Mitchell Cindy Wasser	Enterprise Community Partners Home Innovation Research Labs

Plan	Section	Page	Comment	Date Received	Commentor	Organization
			We acknowledge that AHFA, like many state housing finance agencies, justifiably wants to minimize up-front development costs associated with housing credits. Green building rating and certification systems help to ensure that projects funded by housing credits will not only create new housing opportunities but also ensure that people living in affordable housing are healthier, spend less money on utilities, and have more opportunities through their connections to transportation, quality food and healthcare systems. Offering the additional option of green building certification to developers provides the flexibility to choose the best path for their project to meet their design goals and financing requirements as well as their residents' needs and priorities. With awards generally limited to one project per county, adding a green certification incentive would also provide developers another avenue towards a competitive bid and contribute to promoting racial equity in low-income, disadvantaged communities. Currently, 39 state/local housing finance agencies have determined that whole building energy and green building programs are a prudent use of Housing Credits and have included them in their QAPs. These programs are proven to be a cost-effective way to lower residents' and property owner's bills, reduce unit turnover and provide healthier, more comfortable homes for residents. As stated in AHFA's 2021 Annual Report, 'The way home is also paved by our multifamily programs that incentivize developers to build quality, affordable rental housing throughout the state'. Green building certification to a credible third-party program can be a tool in AHFA's toolbox to help incentivize those developers and would offer AHFA even greater assurance of construction quality, operational efficiency, and resident comfort. That efficiency can ease energy burdens for residents, enabling them to move towards a path of home ownership as well reducing costs for developers and property owners on the operation and maintenance side.			

Plan	Section	Page	Comment	Date Received	Commentor	Organization
			The Alabama development community is equipped to implement holistic green building requirements. Statewide, there are nearly 1,000 ENERGY STAR single-family homes and apartments. There are also over 200 multifamily buildings that have been certified to green building standards including Enterprise Green Communities — which is the only national green building program created with and for the affordable housing sector. These statistics signal that the local building industry is familiar with green building practices and third-party certification processes. The current 2020 Green Communities Criteria incorporates five themes critical to healthy, sustainable affordable housing development: integrated design, a path to zero energy, healthy housing, water and resilience. Developers who achieve 2020 certification also receive WELL certification through Enterprise's partnership with the International WELL Building Institute (IWBI). We welcome the opportunity to discuss these recommendations and third-party programs further with you or your staff, and I will gladly provide any supplemental information that may be beneficial. We look forward to working with AHFA to promote energy efficient and green affordable housing in Alabama!			

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	A-11	A. 2.)(v) a. and b. While the ERA program was and is extremely benificial for tenants impacted by COVID, no notice was given by AHFA that competitive points would be awarded on future appllciatons submitted by applicants under contract with property management companies whose tenant populations participated at the specified percentages. If AHFA wants to incentivise, rather than punish, developers and managers to deploy more resouces to assit tenants with ERA applications, it should do so prospectively rather than after the fact. IF the points for ERA remain in the QAP, the language should be changed from "secured funding" to applied for ERA funding". There are many barriers to actually receiving the ERA funding.	8/12/2022	Jason Freeman	Gateway Development Corporation
Housing Credit	Point Scoring	A-12	The Points Lost section of Addendum A designates in item 2.) the points lost for non-compliance with the Compliance Requirements outlined in Addendum D and goes on to state that "Applications with Responsible Owners that have Non-AHFA Projects, whether in the State and/or out-of-State, will be subject to the same AHFA requirements defined in attached Addendum D" and goes on to provide that "the 4 point threshold in Addendum D does not apply to Non-AHFA Project(s)." First, if a Housing Credit property is in compliance with the allocating agency in the state responsible for monitoring it, it should be considered in compliance for purposes of point deductions. Second, if the first point is addressed so that compliance with the allocating agency's criteria in the state where the property is located means you are in compliance for purposes of point scoring, then the differing treatment of Non-AHFA Project(s) for purposes of the 4 point threshold would no longer be an issue; however, if that language is not changed, then non-AHFA Projects should also receive the benefit of the 4 point threshold. In other words, if out of state projects are held to the same compliance standards, they should be afforded the same compliance point deduction threshold. Please confirm the 4 point threshold referenced here is the one set out in Addendum D, page D-4, section II.F.	8/15/2022	Paula McDonald Rhodes	InVictus Development, LLC
Housing Credit	Point Scoring	36	New Funds: Since new funds are so difficult to acquire, AHFA should consider lowering the per unit amount of subsidy for each point category. Helping	8/15/2022	Ann Marie Rowlett	Rowlett & Company, LLC

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	Point Scoring	37	Rehab of Matured HOME Loans: AHFA should consider awarding points on a sliding scal based on how much an expring HOME loan project can afford to pay back. Not all projects are financially sound enough to pay back 30%, AHFA should consider awarding points to projects that can pay back 20% or 10% ax well.There aree projects with really large HOME loans that just cannot afford to borrow 30% of the HOME loan paydown. This is especially true in very low income (low AMI) rural areas of the state where the HOME funds were needed to make the project work.	8/15/2022	Ann Marie Rowlett	Rowlett & Company, LLC
Housing Credit	Point Scoring		Thank you for the opportunity to provide feedback on AHFA's Draft 2021 QAP. I appreciate AHFA's collaborative and inclusive approach and respectfully offer the following comments and recommendations. I am a green building and healthy housing consultant working across the southeast region. Many states, including Georgia and Mississippi, require green building certification within their QAPs. We request that AHFA require all new construction projects to certify to ENERGY STAR's Residential New Construction program, and for rehabilitation projects to undergo a pre-rehabilitation energy analysis and energy audit to identify and install cost-effective energy upgrades. I acknowledge that AHFA, like many state Housing Finance Agencies, justifiably wants to minimize up-front development costs associated with Housing Credits. However, affordable housing residents should not bear the burden of costly utilities and uncomfortable housing. They should be able to pay their rent and energy bills and still be able to put food on the table. Additionally, energy efficient buildings are proving to be more healthy for residents and require lower ongoing maintenance costs. Whole building energy programs, like ENERGY STAR, are proven to be a cost-effective way to lower residents' and property owner's bills, reduce unit turnover and provide healthier, more comfortable homes for residents. Currently, 41 state housing finance agencies have determined that whole building energy and green building programs are a prudent use of Housing Credits and have included them in their QAPs. Additionally, by including a whole building energy program in Alabama's QAP, AHFA would also create a level playing field for developers, as their projects must currently comply with different energy codes in different jurisdictions. I appreciate your consideration on this matter.	8/15/2022	Abe Kruger	SK Collaborative

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	ENV Policy	B-5	“Choice Limiting Activities” and Other Activities Prohibited We request that soil borings be allowed as a post-application activity for all projects. Soils reports are needed to support civil, structural, and architectural plans. These plans are needed to obtain permitting (i.e. federal, state, and/or local) to allow for the construction process to begin. Per HUD, performance of work necessary to obtain permits can be taken prior to the completion of the environmental review. Geotechnical explorations for the typical affordable housing project includes approximately 10 borings with typical depths of approximately 10 to 25 feet. These borings are typically 4 to 8 inches in diameter. Such would be considered as minimal soil borings for a 4 to 10 acre site. HUD does not consider minimal soil borings as choice limiting actions. AHFA allows for geotechnical explorations prior to completion of the environmental review process on Housing Credit project. With the above, the same should be allowed for HOME projects. For reference: Vermont Community Development Program (VCDP) U.S. Department of Housing and Urban Development 24 CFR Part 58 Environmental Review Process Memo For all other grants [non planning grants], where the grant is being used to implement the actual project, it is acceptable and necessary to conduct planning activities prior to or during the ER because these studies are needed in order to complete a higher-level ER (e.g. Categorically Excluded or Environmental Assessment, described in the next section). For example, a Phase I ESA, an engineering study, archaeological investigation, etc., are all appropriate activities that can take place prior to the Environmental Review Release, as long as the grant is not a planning grant.	8/9/2022	David Morrow	Morrow Realty

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	ENV Policy	B-8	b. Wetlands We request that AHFA allow wetlands on a project site if they are not disturbed or if delineated per HUD and/or Corps of Engineers requirements. We also request that AHFA allow streams on a project site if they are mitigated. Many cities and counties across the state won't allow a small piece of a parcel to be subdivided out to remove wetlands or streams and many sellers are unwilling to retain the wetlands portion of a parcel (e.g. Seller has a 6 acre parcel and a small 0.01 acre portion of the parcel has wetlands). Most cities and counties will not allow the 0.01 acre portion to be subdivided out of the larger parcel unless the seller owns the parcel adjoining the wetlands parcel. Many cities and counties are also using the subdivision process to place restrictions on development as well. The difficulty of meeting the city subdivision requirements when taking out wetlands is difficult because the portion taking out has to meet access and other requirements for remaining parcels.	8/9/2022	David Morrow	Morrow Realty
Housing Credit	ENV Policy	B-7	Radon: If an existing property that tests for Radon receives one positive Radon result for one unit in the property, but two subsequent tests determine this result was likely a false positive, mitigation efforts should be limited to the one unit that tested positive assuming no other units receive positive tests in subsequent testing. [Explanation: Radon tests occasionally result in false positives in units where other factors exist such as units with a tenant that habitually smokes inside. A single positive test that is subsequently shown to likely be a false positive due to two subsequent negative tests should not trigger the large expense of retrofitting an entire complex to meet radon mitigation standards when these funds could be used to enhance the property in other ways.]	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	ENV Policy	B-8	Allow projects to have wetlands if they are not disturbed or have the appropriate Corp of Engineers permit. It takes a long time to get Corp approval- consider allowing any delineation to occur 60 days after the submission date	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation
Housing Credit	ENV Policy	B-9	If AHFA chooses to utilize HUD noise standards for properties, it should apply them consistent with HUD methodology in terms of application to green spaces, parking areas, and common areas. [Explanation: HUD decibel levels are calculated on a cumulative basis for areas where tenants potentially are in one spot for extended periods of times. These decibel levels are applied inappropriately to areas like parking lots and sidewalks along right of ways where tenants do not stay for hours at a time.]	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation
Housing Credit	ENV Policy	B-9	AHFA interprets exterior noise requirements to be at the property line. This is not consistent with HUD. We request that AHFA adopt HUD Guidelines for exterior noise requirements. This would mean that only outdoor areas designated for recreation (such as patios, picnic areas, balconies, etc.) would be subject to the 65 dB threshold for acceptability. For Housing Credit applications, the QAP indicates "….mitigating measures should be incorporated into the project to the fullest extent practicable." Please add clarifying language to explain the meaning of "should" and "fullest extent practicable." It is critical to understand when what applies, and how, as this is a Threshold item.	8/11/2022	AAHA	Alabama Affordable Housing Association
				8/12/2022	Jason Freeman	Gateway Development Corporation

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	ENV Policy	43 - 44	AHFA should consider, particularly on rehabs of existing AHFA properties, accepting the HUD guidelines and using the HUD methodology for noise abatement and control. These projects have been operating for 20+ years with no issues from tenants regarding noise. Having to build large sound walls takes away funds that could be used to improve tenants living spaces and is in some cases, depening on the size and length of the wall, simply not finanically feasible. This is unfair to tenants living at such properties that they can't receive the benefit of renovated units because of noise requirements that are above and beyond that of HUD.	8/15/2022	Ann Marie Rowlett	Rowlett & Company, LLC
Housing Credit	DQS	C-1	Alabama is no longer using the 2009 IECC, as stated on this page. The reference can be updated to reflect current use of the 2015 IECC with Amendments.	8/12/2022	Amelia Godfrey and Alyson Laura	Southface Institute
Housing Credit	DQS	C-1	The Alabama Department of Economic and Community Affairs (ADECA) has adopted the 2015 International Energy Conservation Code (IECC), with amendments and the American Society of Heating, Refrigerating and Air- Conditioning Engineers (ASHRAE) 90.1-2013. We respectfully request that the Design Quality Standards and Construction Manual, Section I. Introduction energy code reference be updated to align with ADECA's adoption. This alignment would provide Alabamians residing in affordable housing equity with those in market rate housing. Additionally, the increased efficiency of the projects will reduce utility costs, lowering the energy burden of low-income disadvantaged residents. Any increased building construction costs may have opportunities to be offset through Federal rebates and incentives, design synergies, and a lower percentage of a HUD Utility Allowance being needed for utility bills (a greater percentage towards rent). Please see this link for additional information: https://adeca.alabama.gov/wp-content/uploads/Alabama-Energy-and-Residential-Code.pdf	8/15/2022	Cindy Wasser	Home Innovation Research Labs

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	DQS	C-10	The Alabama Department of Economic and Community Affairs {ADECA} has adopted the 2015 International Energy Conservation Code {IECC}, with amendments, and the American Society of Heating, Refrigerating and Air- Conditioning Engineers {ASHRAE} 90.1-2013. We respectfully request that the Design Quality Standards and Construction Manual, Section I. Introduction energy code reference be updated to align with ADECA's adoption. This alignment would provide Alabamians residing in affordable housing equity with those in market rate	8/15/2022	Kandice Allen Mitchell	Enterprise Community Partners
Housing Credit	DQS	C-7, C-1	The Insulation Requirements stated in these areas are redundant given the current energy code in effect in the state of Alabama. Specifying insulation here may potentially create a conflict with future projects in the event that the statewide energy code is updated or if projects deviate from more commonly used building materials. For example, if a project uses metal studs in lieu of wood, the walls would be required to insulate to R-5 continuous with R-13 cavity. Additionally, requiring vapor retarders on insulation in buildings in climate zones 3-2 increases the risk of mold/mildew growth in wall cavities and should not be encouraged. Suggest replacing all bullets with the following, "Meet or exceed current energy code adopted by Alabama."	8/12/2022	Amelia Godfrey and Alyson Laura	Southface Institute
Housing Credit	DQS	C-7 & C-12	Specifying insulation here may potentially create a conflict with future projects in the event that the statewide energy code is updated or if projects deviate from more commonly used building materials. Recommend replacing all bullets with: "Meet or exceed current energy code adopted by Alabama."	8/15/2022	Abe Kruger	SK Collaborative

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Housing Credit	DQS	C-11 & A-5	Regarding landscaping and trees in item 2.) e. on C-11, the benefits of reducing the urban heat island effect and reducing cooling costs should be considered when defining the minimum depth of sod versus number of trees and shrubs. Additional long-term benefits of trees include increased property value and improved air quality. A proposed heat island reducing DQS for a landscape plan could require 60% trees and shrubs and 40% sod. Alternately, the heat island reducing landscape ratio suggested above could be added to the point scoring section on A-3 as an extra amenity. Alternately, because trees and shrubs require less irrigation than sod, the proposed ratio will reduce operating expenses in water consumption while also enhancing community resilience benefits by reducing the heat island effect. This could be added to A-5 as an Energy/Water Conservation and Healthy Living Environment strategy if AHFA chooses to maintain the current structure of this section.	8/12/2022	Amelia Godfrey and Alyson Laura	Southface Institute
Housing Credit	COVID Response	E-1	AddendumE: Because of the looming IRS 10% test deadline on 2021 Tax Credit Projects, owners need to be able to apply for 2023 additional credits and receive a response no later than November 1, 2022. If the owner is not able to make a determine on the project's financial feasibility and ability to swap 2021 credits for 2023 credits to extend the current 10% Test Deadline past December 31, 2022, they need to know before the IRS deadline. Additionally, investors are not willing to provide equity to projects that have gaps of 25%, or in some cases, more. Some projects have commitments for low interest permanent debt which will expire before the project can be completed if an owner has to wait until a 2023 cycle could be implemented.	8/15/2022	Jonathan Toppen	Tapestry Development Group, Inc.
Housing Credit	COVID Response	E-1	AddendumE: Because of the looming IRS 10% test deadline on 2021 Tax Credit Projects, owners need to be able to apply for 2023 additional credits and receive a response no later than November 1, 2022. If the owner is not able to make a determine on the project's financial feasibility and ability to swap 2021 credits for 2023 credits to extend the current 10% Test Deadline past December 31, 2022, they need to know before the IRS deadline. Additionally, investors are not willing to provide equity to projects that have gaps of 25%, or in some cases, more. Some projects have commitments for low interest permanent debt which will expire before the project can be completed if an owner has to wait until a 2023 cycle could be implemented.	8/15/2022	Judy Van Dyke	Vizion Driven Communities, LLC

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	COVID Response	E 1-4	Thank you for providing 2023 pandemic relief provisions in the proposed 2023 QAP for 2021 developments. Additional resources such as tax credits and other resources are necessary in order for these develops to move forward in a stable way. Due to inflation and market pressures causing significant increases in construction costs, we request that AHFA open a special designated COVID Pandemic Relief Response application round for 2021 funded deals to receive additional tax credit allocations and ensure that all 2021 awarded applications are eligible to submit a supplemental funding request and demonstrate their need for additional Housing Credits/HOME funds to offset cost overruns. We request that this special application round be opened as soon as possible after approval of the 2023 QAP and that all resources be available to assist the 2021 awarded applications.	8/9/2022	David Morrow	Morrow Realty
Housing Credit	COVID Response	E-4	Thank you for providing COVID relief provisions in the proposed 2023 QAP for 2021 developments. Additional resources such as tax credits and other resources are necessary for us to move forward. Consruction cost, inflationary factors and market pressures have caused significant increases in construction costs. We appreciate this opportunity to successfully build these affordable properties. Time has proven not to be our friend as costs continue to increase and we encourage the special application round be opened and awarded as soon as possible after approval of the 2023 QAP.	8/9/2022	Eric Lipp	Azalea Landing
Housing Credit	COVID Response		Request a response to the extra credit applications by 11/1/22 at the latest to ensure the owner has enough time to determine whether or not to move forward with the project if AHFA cannot swap the credits for a 2022 or 2023 allocation due to those projects that received a 2021 reservation having an extended IRS due date of 12/31/22 to meet the 10% Test. There is too much risk involved without knowing that the credits can be swapped out to extend the 10% Test due date and that there will be enough sources to make the deal feasible to close with the lender and investor to try to meet the 10% Test by 12/31/22 IRS deadline.	8/15/2022	AAHA	Alabama Affordable Housing Association

Plan	Section	Page	Comment	Date Received	Commentor	Organization
Housing Credit	COVID Response	E-4	Thank you for including Addendum E, COVID-19 Pandemic Response for Projects that Received Housing Credit Allocaitons under AHFA's 2021 Qualified Allocation Plan to provide additional resources for 2021 projects facing unusual cost increases. We request that AHFA open a special designated COVID Pandemic Relief Response application round for 2021 funded deals to receive additional tax credit allocations and ensure that all 2021 awarded applications are eligible to submit a supplemental funding request and demonstrate their need for additional Housing Credits/HOME funds to offset cost overruns. We request that this special application round be opened as soon as possible after approval of the 2023 QAP and that all resources be available to assist the 2021 awarded applications.	8/15/2022	Mitchell Davenport	Clement & Company, LLC

OFFICE OF THE MAYOR

MOBILE
ALABAMA

August 11, 2022

VIA EMAIL

Alabama Housing Finance Authority
Attn: Multifamily Division
P. O. Box 242967
Montgomery, Alabama 36124-2967

To Whom It May Concern:

I write to support an exception to the "2 mile rule" for applications that represent an effort to redevelop housing in a neighborhood and which receive local federal funding from a jurisdiction.

The Qualified Allocation Plan currently recognizes an exception to the "2 mile rule" for applications that receive funding from public housing authorities. This exception is justified to assist efforts by public housing authorities to redevelop old and obsolete public housing that involves the need for multiple phases. Such efforts are critically important to local government efforts to revitalize neighborhoods and improve the quality of life for its citizens. However, efforts to replace troubled affordable housing can also be led by city governments and in many cases must be led by city governments. Accordingly, the Alabama Housing Finance Authority should make an exception for multi-phase redevelopments that are directly tied to the replacement of older housing stock and are funded with federally derived City funds. Such projects are vitally important and adding this exception will allow cities to take the lead in addressing critical housing needs.

Sincerely,

William S. Stimpson
Mayor

City of Mobile | P.O. Box 1827 Mobile, Alabama 36633 | www.cityofmobile.org

OFFICE OF THE MAYOR

MOBILE
ALABAMA

August 11, 2022

VIA EMAIL

Alabama Housing Finance Authority
Attn: Multifamily Division
P. O. Box 242967
Montgomery, Alabama 36124-2967

To Whom It May Concern:

I write to support the removal of scoring components that are based on census tract median income.

The Qualified Allocation Plan currently considers the income of census tracts as a potential scoring component for those that are higher than 80% Area Median Income. This scoring component effectively reduces the number of high scoring applications from areas that also happen to be of high minority concentration within the City of Mobile, which has the effect of limiting access for housing choice to these areas. Accordingly, the Alabama Housing Finance Authority should remove any scoring component that is based on census tract income. Use of such criteria could be seen as discriminatory to areas that are currently and have historically been occupied by minority and underrepresented groups.

Sincerely,

William S. Stimpson
Mayor

City of Mobile | P.O. Box 1827 Mobile, Alabama 36633 | www.cityofmobile.org

OFFICE OF THE MAYOR

MOBILE
ALABAMA

August 11, 2022

VIA EMAIL

Alabama Housing Finance Authority
Attn: Multifamily Division
P. O. Box 242967
Montgomery, Alabama 36124-2967

To Whom It May Concern:

I write to support an exception to the limit of one award per county for applications received from proposed projects with active disaster funds in response to federally declared disaster areas.

The Qualified Allocation Plan currently restricts one award per county maximum, with certain limited exceptions. In previous Qualified Allocation Plans, there have been exceptions made for disaster areas to increase the possible number of awards so that more replacement housing can be placed within areas that have been impacted most by recent disaster. Accordingly, the Alabama Housing Finance Authority should make an exception to allow more than one award within counties that have recently been impacted by federally declared disasters. Such projects are vitally important and adding this exception will allow housing needs in the most impacted areas of disasters to be rebuilt to remediate this issue quickly.

Sincerely,

William S. Stimpson
Mayor

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