

AHFA 2017 Draft Low-Income Housing Credit Qualified Allocation and HOME Action Plans
Public Comment Form
Commenting Period October 11, 2016 – November 10, 2016

All comments regarding the Draft Plans must be submitted using this form. General Comments may be submitted at the bottom of the form. **Comments which include cut-and paste text (or redlined/re-worded sections) of the proposed Plans will be rejected.** AHFA will not respond (or seek to interpret) to suggested change in language without a complete explanation of the suggested language change. Please provide full explanatory and careful comments regarding your proposed changes, keeping in mind that your proposed changes might have an unintended consequence for a different project or location in the state. All forms should be submitted to ahfa.mf.gap@ahfa.com as an attachment to the email. Other documentation, e.g., product information or photos, may also be submitted. Upon close of the commenting period, all comments will be posted at www.ahfa.com for review.

11/8/2016

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Plan Section	Section Reference	Page #	Specific Comments
Plan HOME	Section Addendum A.	6	<p>In the Rent Affordability Section of Addendum A of the draft HOME Plan (page 6) AHFA lists specific subsidies that can receive points such as CDBG, AHP, local HOME funds etc. Developers have an equal opportunity to compete for these sources of subsidy, and they should remain in the plan. However, there is one source of subsidy listed that is only available to Neighborworks affiliates and there are only three of these affilitates in Alabama- Community Action Partnership of North Alabama (CAPNA), Community Service Program of West Alabama (CSP) and Neighborhood Housing Services of Birmingham. When we met with one of these affiliates to discuss accessing these funds, they told us the affiliate had to develop and own the project being developed to access these funds. So we could not access this source of funds even though we are a CHDO. This means these three organizations are the only developers in Alabama that have access to a source of funds that will earn them subsidy points, which gives the an unfair advantage.</p> <p>This advantage is especially troubling since these affiliates would likely be competing for the CHDO setaside funds. We are a CHDO, but did not compete for CHDO setaside funds last year since we knew one of these affiliates would earn subsidy points for their Neighborworks Capital Grant that we could not match.</p> <p>Allowing this situation to continue will discourage the submission of CHDO setaside applications. AHFA will likely have few or no CHDOs that are not Neighborworks affiliates applying for the CHDO setaside funds since the nonaffiliates will always start with a disadvantage.</p> <p>To create a fair competition, AHFA should only provide points for subsidies such as AHP, CDBG, local HOME, Home Depot Foundation, etc. that all developers can access.</p>

