

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.

11/10/2016

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Plan Section	Section Reference	Page #	Specific Comments
HOME	III	7	LIHCA recommends that AHFA decouple Alabama HOME funds from the Low Income Housing Tax Credit (LIHTC) Program. Reason: HOME funds are instrumental around the country for developing small projects for vulnerable households, victims of domestic violence, and youth aging out of foster care. There are a number of nonprofit organizations that would like to be able to access HOME funds and develop supportive housing that might have fewer than 12 units. These nonprofits are working to serve the most vulnerable populations and are willing to provide supportive services to create the supportive housing needed to sustain these individuals and families in safe and affordable homes. Additionally, studies have shown that the cost of housing plus services is much less expensive than the costs of expensive alternatives such as shelter care, hospitals, jails, etc. Smaller tax credit deals are infeasible and, generally, tax credit investors are not interested in small properties. If AHFA makes available a portion of the HOME funds separate from the LIHTC program, these organizations could provide supportive housing for these vulnerable populations, while also saving the state money on more expensive alternatives associated with homelessness and those at-risk of homelessness.
HOME	III	10	LIHCA recommends that AHFA utilize HOME funds for activities other than residential rental housing. Reason: The federal HOME program provides for eligible activities of homeowner rehabilitation, homebuyer programs, and rental subsidies as eligible activities. Rehabilitation activities are often used by local governments and nonprofits to stabilize communities and address health and safety issues in dilapidated homes. Rehabilitation is a key principle of smart growth strategies and better utilizes existing infrastructure

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			and services. Affordable homeownership is another activity typically supported with HOME funds. It not only helps families obtain homeownership, it also supports the local tax base and stabilizes marginal communities. By expanding the state’s HOME eligible activities, funds could be used to stabilize and improve blighted communities through rehabilitation, address health and safety issues of lower income homeowners, and create more decent and safe housing opportunities for individuals with low incomes.
HOME	Add A - Point Scoring	3	LIHCA recommends that AHFA incentivize developers to provide a portion of the units in all developments as permanent supportive housing by including selection criteria points in the QAP to projects that integrate a percentage of permanent supportive housing units. Reason: Vulnerable populations, including those living with mental illness and/or substance abuse, HIV/AIDS, those experiencing homelessness, and survivors of domestic violence, tend to be marginalized from mainstream housing resources and often need supportive services to maintain housing stability. Permanent supportive housing not only seeks to house these populations, but provides supportive services to ensure housing stability. Developers could partner with local service providers to support these tenants with supportive services. Research has demonstrated that supportive housing saves money, as it costs less to house an individual and provide support by reducing the use of public services and the cost of spending time in jails, emergency rooms, and institutions. By prioritizing permanent supportive housing, AHFA would help to reduce the number of homeless and extremely rent burdened individuals and families living in Alabama.
HOME	Add A - Point Scoring	6	LIHCA recommends that AHFA incentivize developers to list their newly funded properties on ALHousingSearch.org by allocating point(s) to developers who list on the site. Reason: ALHousingSearch.org is Alabama’s comprehensive rental housing locator and is completely free for landlords to use to list their properties. It is easy to use and landlords may be assisted by ALHousingSearch.org’s administrator. A comprehensive list of all rental units in Alabama is a critical tool when disaster strikes and can be utilized to quickly rehouse victims of natural and man-made disasters. Listing all new HOME/LIHTC properties on the site will be a valuable tool not only for landlords (who can market their properties for free), renters (who can search free of charge), but also in times of disaster when housing must be located quickly and efficiently.

