SUMMARY OF CITIZEN PARTICIPATION PROCESS AND LISTING OF COMMENTS RECEIVED 2026 HOUSING CREDIT QUALIFIED ALLOCATION PLAN, 2026 HOME ACTION PLAN, 2026 NATIONAL HOUSING TRUST ALLOCATION 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 2026 Housing Credit Qualified Allocation Plan, draft 2026 HOME Action Plan, draft 2026 National Housing Trust Fund Allocation Plan, (Plans) were published in the Athens News Courier, Decatur Daily, Dothan Eagle, Florence Times Daily, Fort Payne Times Journal, Gadsden Times, Montgomery Advertiser, Opelika Auburn News, and the Tuscaloosa News. To increase awareness of availability, the Plans and Public Hearing Notice were also posted on the Alabama Housing Finance Authority (AHFA) website, and on AHFA social media platforms (Facebook and LinkedIn). AHFA emailed 1,966 notices on February 10, 2025, and 1,952 notices on March 4, 2025, 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 March 7, 2025. During the designated commenting period, AHFA received 143 written comments from 19 individuals and organizations pertaining to the 2026 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 determined the appropriate action to take with respect to each comment received by evaluating each for:

- Clarity and ease of implementation within the proposed 2026 Draft Plans.
- Changes which would justify a major modification to the 2026 Draft Plans but would be more appropriate for consideration during the development of the 2027 Draft (or later year's) since the material nature of the changes proposed would require adequate time to implement and require a public commenting process.
- Changes suggested would require significant research, analysis, and planning to assess fully their practicality and feasibility before incorporation into the Plans. Accordingly, a public commenting process would be required, and the proposed changes would be evaluated for consistency with the stated goals and objectives of the Plans, applicable industry standards, and AHFA policies.
- Narrative comments, opinions, or questions which do not clearly define an actionable request or are unrelated to the current Draft Plans. Under these circumstances, staff is prohibited from attempting to interpret the commenter's intent.
- Industry specific or changes in regulatory guidance which require corrections to technical language in the Plans.

AHFA reviewed the comments received and revised the Plans based on certain comments submitted. A listing of the comments received are attached for review. 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, and subject to the criteria and requirements of the applicable Plan.

See Attached, Listing of Comments Received

A. Public Comments Submitted to AHFA. The comments are available for viewing at the following AHFA website link: https://www.ahfa.com/multifamily/allocation-application-information/current-year-allocation-plans.

2026 Citizen Participation Process

Listing of Comments Received

2026 Draft Plans:

This document contains the cumulative list of comments received with respect to the 2026 Citizens Participation Process.

Index of Comments Received

AHFA Draft 2026 Low-Income Housing Credit Qualified Allocation Plan, 2026 HOME Action Plan, and 2026 National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period February 7, 2025 – March 7, 2025

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2/25/2025

Name: Sam Johnston Organization: Arbour Valley Communities Email: sam@arbourvalley.com Phone: 205-981-3393

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Plan	II	16 of 30	Consideration should be given to phased developments. With multiple phases, a property attains a greater critical mass and associated operating efficiencies/financial resiliency to weather sharply increasing costs such as property insurance. As such, please consider an exception to the 2-mile radius requirement from phase I developments involving one or more of the Responsible Owners of the original Phase I development. "Adjacent" would include phases separated by a street, alley, ROW or easement.
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3/6/2025

Name: Cindy Prater Organization: The Bennett Group Email: cindy@thebennettgrp.net Phone: 334-758-8404

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
HOME	III	4	Establishment of Housing Priorities: AInclude development in rural counties as a priority & incentivize same with points or a set-aside to ensure individuals in the most under served areas of the state continue to have access to quality affordable housing.
HOME	IV	17	Status of Previously Funded Projects: Remove requirement for previously funded projects to be at least 50% complete and replace same with requirement that prevously funded projects must have acquired the site and closed on the construction loan and equity.
HOME	Point Scoring	A-6	New Funds: Add additional avenues of funding such as Section 8aa Capital Advances, grants, or other favorable financing products not currently noted (but that owners may be able to secure). Alternately, provide guidance on the criteria AHFA requires for a new source to be considered for this category.
HOME	Point Scoring	A-7	Tenant Needs: Require annual recertificationof the MOU with service providers for the disabled/homeless population set-aside units.
HOME	Point Scoring	A-7	Tenant Needs: Require written evidence of efforts made to lease units set-aside for the disabled/homeless population before the units are made available to the general public, not only at initial lease-up but throughout the development's compliance period.
HOME	Point Scoring	A-8	Neighborhood Services: Revise the distance definition to radius (as the crow flys) instead of turn-by-turn driving distance.
HOME	Point Scoring	A-9	Neighborhood Service: Revise the Bank/Credit Union criteria to include ATM locations
HOME	Point Scoring	A-7	Tenant Needs: Add points for developments that choose to set-aside units for tenants with disabilities or homeless populations above the current minimum of 7%.

Housing Credit	I	3	Establishment of Housing Priorities: AInclude development in rural counties as a priority & incentivize same with points or a set-aside to ensure individuals in the most under served areas of the state continue to have access to quality affordable housing.
Housing Credit	II	12	Status of Previously Funded Projects: Remove requirement for previously funded projects to be at least 50% complete and replace same with requirement that prevously funded projects must have acquired the site and closed on the construction loan and equity.
Housing Credit	Point Scoring	A-6	New Funds: Add additional avenues of funding such as Section 8aa Capital Advances, grants, or other favorable financing products not currently noted (but that owners may be able to secure). Alternately, provide guidance on the criteria AHFA requires for a new source to be considered for this category.
Housing Credit	Point Scoring	A-7	Tenant Needs: Remove points for development of projects designated,equipped, and set-aside for Elderly or Family. As these are the only types of development allowable, the points do not contribute to the competitive application process. Any specifics regarding percentage of particular bedroom types, bathroom designs, etc., can be included in Design Standards.
Housing Credit	Point Scoring	A-8	Tenant Needs: Add points for developments that choose to set-aside units for tenants with disabilities or homeless populations above the current minimum of 7%.
Housing Credit	Point Scoring	A-8	Tenant Needs: Require annual recertificationof the MOU with service providers for the disabled/homeless population set-aside units.
Housing Credit	Point Scoring	A-8	Tenant Needs: Require written evidence of efforts made to lease units set-aside for the disabled/homeless population before the units are made available to the general public, not only at initial lease-up but throughout the development's compliance period.
Housing Credit	Point Scoring	A-9	Neighborhood Services: Revise the distance definition to radius (as the crow flys) instead of turn-by-turn driving distance.
Housing Credit	Point Scoring	A-9	Neighborhood Service: Revise the Bank/Credit Union criteria to include ATM locations
Housing Credit	Point Scoring	A-8	Project Type: Implement a sliding point scale for projects that have maturing HOME loans but are unable to pay off the loan in full or paydown the balance by 30%. For example, 2 points for paydown of 10%, 4 points for paydown of 20%, etc. This is an area of particular concern for smaller, rural developments that don't cash flow as well as larger, metro developments. Several are also located in counties that have seen little to no economic development since construction while the need to maintain affordable housing in their communities has become increasingly important.

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Housing Credit	Point Scoring	A-9	Project Type: Include points for the acquisition/rehabilitation of older LIHTC only developments as they are currently unable to effectively complete against the acquisition/rehabilitation of maturing HOME projects that have paid off their HOME loan or paid it down by at least 30%.
General Comment	Section		Remove requirement for telephone service letters as part of the application process. The use of land-line telephones is virtually non-existant and this letter continues to be increaslingly difficult to obtain.
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3/7/2025

Name: Michael Newman Organization: Insurance Institute for Business & Home Safety (IBHS) Email: mnewman@ibhs.org Phone: ______

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	II	15	AHFA should add resilent construction practices to the Application Threshold Requirements. All AHFA projects should obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety, as follows: 11) Resilient Construction. Commit to resilient construction standards. All projects must obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety. Based on decades of scientific research, IBHS's FORTIFIED™ program is a set of voluntary, beyond-code construction upgrades that improve a building's resistance to the effects of high winds, hail, hurricanes and even tornadoes. The FORTIFIED program is available for single-family houses, multifamily properties, and commercial structures. The program features a technical standard and an independent verification process that ensures that buildings obtaining a FORTIFIED designation from IBHS have, in fact, reduced their risk. Studies following Hurricane Sally (in Alabama) and Hurricanes Matthew, Florence, Dorian, and Isaias (in North Carolina) concluded that FORTIFIED designated homes are less likely to have an insurance claim and, for those homes with insurance claims, claims that are smaller on average. The independent verification process of FORTIFIED ensures that buildings obtaining a designation from IBHS have, in fact, reduced their risk. This verification and designation process has a meaningful, quantitative value. Alabama's experiences in Hurricane Sally are instructive. Like Florida, the coastal counties of Alabama have a building code that is on par with

			FORTIFIED requirements. In an ongoing analysis of the loss experience of approximately 40,000 houses in coastal Alabama, we see three tiers of performance. Standard-built homes—not built to FORTIFIED requirements—perform worst by a wide margin. More interestingly, FORTIFIED-designated homes perform twice as well as homes built to FORTIFIED-like code, but not designated. The value of FORTIFIED has also been explored in a 2022 study from the University of Alabama's Culverhouse College of Business, which concluded that building or retrofitting to FORTIFIED has relatively minimal costs and a strong rate of return. Further, a new IBHS study exploring opportunities to enhance the resilience of Section 8 multifamily and single-family housing in the Atlantic and Gulf coast regions estimates that retrofitting these properties with a FORTIFIED Roof could decrease losses by 30-50 percent.
Housing Credit	Point Scoring	3	AHFA should offer a maximum of 4 points to all projects that obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety. Award 1 point to projects that obtain a FORTIFIED Roof designation. Award 2 points to projects that obtain a FORTIFIED Silver designation. Award 3 points to projects that obtain a FORTIFIED Gold designation. Award 1 additional point to projects that obtain any FORTIFIED designation with Hail Suppplment. In the absence of requirements, incentives via the scoring criteria encourages developers to build to FORTIFIED. See prior comment for efficacy of FORTIFIED in increasing the survivability and insurability of housing in Alabama.
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3/7/2025

Name: Gary Hall Organization: Alabama Affordable Housing Association Email: ghall@hallhousing.net Phone: 334-701-9024

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	ENV Policy		We are requesting that AHFA adopt the requirements per the HUD Noise Standards and that only these standards be implemented moving forward. a. AHFA adopt the following HUD Environmental Standards: i. Permit the use of engineering and institutional controls to mitigate environmental conditions as addressed under HUD Multifamily Accelerated Processing (MAP) Guide; Section 9.4.5 (D)(1): Engineering and Institutional Controls (EC/IC): An Engineering Control is a physical measure that reduces or eliminates exposure to contamination. An Institutional Control is a non-engineered instrument, such as administrative and legal control. ICs typically limit land and/or resource use or provide information that helps modify or guide human behavior at a site. An appropriate mix of ECs such as capping and slurry walls, and ICs such as protective covenants, access restrictions and tenant and employee notification, are usually required for all RBCAs or other accepted cleanup program as approved by the LSTF authority. ii. Do not impose exterior noise standards at the property line. Per 24CFRPart 51, Subpart B; 51.103(c)(1): Exterior standards. (1) The degree of acceptability of the noise environment at a site is determined by the sound levels external to buildings or other facilities containing noise sensitive uses. The standards shall usually apply at a location 2 meters (6.5 feet) from the building housing noise sensitive activities in the direction of the predominant noise source. Where the building location is undetermined, the standards shall apply 2 meters (6.5 feet) from the building setback line nearest to the predominant noise source. The standards shall also apply at other locations where it is determined that quiet

			outdoor space is required in an area ancillary to the principal use on the site. b. Remove meeting Environmental Policy Requirements as a Threshold item: The conclusions of such assessments are based on the professional opinion of Environmental Professionals (EPs) who sign the reports. The EPs firms are licensed and insured. AHFA is provided with a reliance letter for the reports, including specific insurance requirements. If AHFA or their retained attorneys or environmental consultant(s) have a difference of opinion, all parties should be permitted to resolve the differences of opinion within an adequately allotted appeal timeframe. If AHFA is not open to removing environmental as a Threshold item, consider leaving it as Threshold relative to the identification of recognized environmental conditions (RECs), but allow for differences of opinion relative to scopes of Phase II Environmental Assessments to be addressed between the parties, or resolved by getting a third environmental professional to opine.
Housing Credit	II	12	Status of Previously Funded Projects - remove the requirement for previously funded projects to meet 50% construction complete to be eligible for competition in the next 9% tax credit round. Suggestion: Tax Credit developments must have closed construction/equity for current round eligibility. AHFA HOME deals have 180 days after receiving NEPA clearance to close construction/equity for current round eligibility.
Housing Credit	Point Scoring	A-10	Applicant Characteristics (i) states that 10 points will be given to applicants with participation of minorities or women. This applies in part to ownership composition and in part to contracting set asides. Minorities are defined as certain racial or ethnic categories. The Alabama Affordable Housing Association strongly supports an inclusive affordable housing industry and encourages AHFA to look for appropriate means to support and encourage participation in its programs by women and minorities within constitutional limits. However, the proposed provisions should be reconsidered in light of current law. This provision for additional points based expressly upon race and sex categories appears to violate the Equal Protection Clause of the United States Constitution, as construed by the U.S. Supreme Court in Students for Fair Admissions, Inc. v. President and Fellows of Harvard College, 601 U.S. 181 (2023) (Fourteenth Amendment applies "without regard to any difference of race, of color, or of nationality". P. 206.) Similar to the affirmative action programs held unconstitutional, the AHFA provisions "lack sufficiently focused and measurable

			objectives warranting the use of race, unavoidably employ race in a negative manner, involve racial stereotyping, and lack meaningful end points." P. 230. Executive Orders of the President also provide that preferences based on race or sex violate Federal civil rights laws. EO 14173, "Ending Illegal Discrimination and Restoring Merit-Based Opportunity", January 21, 2025. In part, the EO states: "Yet today, roughly 60 years after the passage of the Civil Rights Act of 1964, critical and influential institutions of American society . . . have adopted and actively use dangerous, demeaning, and immoral race- and sex-based preferences under the guise of so-called 'diversity, equity, and inclusion' (DEI) or 'diversity, equity, inclusion, and accessibility' (DEIA) that can violate the civil-rights laws of this Nation. Illegal DEI and DEIA policies not only violate the text and spirit of our longstanding Federal civil-rights laws, they also undermine our national unity, as they deny, discredit, and undermine the traditional American values of hard work, excellence, and individual achievement in favor of an unlawful, corrosive, and pernicious identity-based spoils system." The EO directs the head of each federal agency, including the Departments of Housing and Urban Development and Treasury, to include in every contract or grant award a term requiring the contractor or grant recipient to certify that they do not operate any programs promoting DEI that violate any applicable anti-discrimination laws and acknowledge that the certification is material for purposes of the government's payment decision and therefore subject to the False Claims Act. See 31 U.S.C. 3729(b)(4). Further, non-compliance puts at risk grants, such as those which fund the HOME Partnership Program. See also EO 14151, January 20, 2025, and EO 14148, January 20, 2025. In addition, such provisions appear to conflict with Alabama's Fiscal Responsibility and Economic Development Act 2023-409, which provides in part "no company in this state shall be required by a governmental entity to . . . establish or implement policies, procedures, guidelines, rules . . . that further social, political, or ideological interests . . . ." Sec. 4(a). Language added for 2025, excluding from consideration women and minorities with an identity of interest with other project participants, also discourages (and in some circumstances entirely prohibits) the involvement of family members, e.g., daughters, complicating succession planning in these highly illiquid real estate projects. Further, such limitation is unclear because it does not define with whom the prohibited identity of interest exists. Presumably, it is with others in ownership, consistent with the context of Section

			II(G)(4), and not every party to the project, which would, for instance, preclude an MBE responsible owner from participating in the transaction through the MBE's affiliated general contractor corporation.
Housing Credit	I	8-9	Non-refundable fees, missing or incomplete docs is currently $2000. A reasonable fee would be $1000 per occurance
Housing Credit	II	31	J. 3. On occasion the initial syndicator's pricing changes and another syndicator is more competitive by the time the project closes. Would suggest that changing syndicators should not be a negative action and when notifying AHFA of a change of syndicator there shouldn't be a penalty fee assessed.
Housing Credit	II	31	J.1. During plan reviews by cities, changes to the site configuration may occur to satisfy the reviewing entity. Would suggest that a change in the site configuration should not also carry with it a penalty fee if it varies from the original site plan submitted in the application so long as the overall intent of the application has been achieved.
Housing Credit	Point Scoring	6	iii.a.1. Consider adding additional avenues of funding to the list. Including but not limited to: community development financial institution (CDFI), any source with long-term AFR financing, or make the threshold for getting any points the $16,000/unit or $20,000/unit or higher.
Housing Credit	Point Scoring	9	vi.h. Consider changing the distance definition to radius instead of driving distance.
Housing Credit	Point Scoring	10	2.i. Awarding points based on someone's gender or ethnicity should be removed. This is discrimination as it is the unfair or prejudicial treatment of people and groups based on characteristics such as race, gender, age, or sexual orientation.
HOME	Compliance	31	Minority and women's Business Outreach should be removed as DEI policies have shown to be unconsitutional (see previous comment above).
HOME	Compliance	31	BABA Act should be removed from the requirements.
HOME	Point Scoring	6	iii.a. Consider adding additional avenues of funding to the list such as community development financial institution (CDFI).
HOME	Point Scoring	8	iii.a. Consider changing the distance definition to radius instead of driving distance.
HOME	Point Scoring	10	2. Awarding points based on someone's gender or ethnicity is should be removed as DEI policies have shown to be unconsitutional.
HTF	Section	5	BABA Act should be removed from the requirements.
General Comment	Section		Consider changing the release and commenting period of future Draft QAPs so they don't conflict with the application periods.
Housing Credit	II	20	E. 1. iii. Allow Basis Boost in all Rural Areas for new construction to make them more financially feasible.

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General Comment	Section		AAHA recommends AHFA insert language, such as an addendum for a supplemental funding round, additional credits, and/or other resource, in the 2026 QAP. This would give AHFA the flexibility to address funding and cost overrun issues that arise on previously funded projects. Proposed tariffs on foreign goods and mass deportations will likely cause an increase in construction materials and labor, and the possibility of lower corporate tax rates has the potential to impact equity pricing, which could negatively impact the feasibility of previously funded projects.
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3/7/2025

Name: Jay Ronca Organization: Vantage Devleopment, LLC Email: jronca@thevantagegroup.biz Phone: 404-788-7162

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	ENV Policy		We are requesting that AHFA adopt the requirements per the HUD Noise Standards and that only these standards be implemented moving forward. a. AHFA adopt the following HUD Environmental Standards: i. Permit the use of engineering and institutional controls to mitigate environmental conditions as addressed under HUD Multifamily Accelerated Processing (MAP) Guide; Section 9.4.5 (D)(1): Engineering and Institutional Controls (EC/IC): An Engineering Control is a physical measure that reduces or eliminates exposure to contamination. An Institutional Control is a non-engineered instrument, such as administrative and legal control. ICs typically limit land and/or resource use or provide information that helps modify or guide human behavior at a site. An appropriate mix of ECs such as capping and slurry walls, and ICs such as protective covenants, access restrictions and tenant and employee notification, are usually required for all RBCAs or other accepted cleanup program as approved by the LSTF authority. ii. Do not impose exterior noise standards at the property line. Per 24CFRPart 51, Subpart B; 51.103(c)(1): Exterior standards. (1) The degree of acceptability of the noise environment at a site is determined by the sound levels external to buildings or other facilities containing noise sensitive uses. The standards shall usually apply at a location 2 meters (6.5 feet) from the building housing noise sensitive activities in the direction of the predominant noise source. Where the building location is undetermined, the standards shall apply 2 meters (6.5 feet) from the building setback line nearest to the predominant noise source. The standards shall also apply at other locations where it is determined that quiet

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Housing Credit	II	12	Status of Previously Funded Projects - remove the requirement for previously funded projects to meet 50% construction complete to be eligible for competition in the next 9% tax credit round. Suggestion: Tax Credit developments must have closed construction/equity for current round eligibility. AHFA HOME deals have 180 days after receiving NEPA clearance to close construction/equity for current round eligibility.
Housing Credit	Point Scoring	A-10	Applicant Characteristics (i) states that 10 points will be given to applicants with participation of minorities or women. This applies in part to ownership composition and in part to contracting set asides. Minorities are defined as certain racial or ethnic categories. The Alabama Affordable Housing Association strongly supports an inclusive affordable housing industry and encourages AHFA to look for appropriate means to support and encourage participation in its programs by women and minorities within constitutional limits. However, the proposed provisions should be reconsidered in light of current law. This provision for additional points based expressly upon race and sex categories appears to violate the Equal Protection Clause of the United States Constitution, as construed by the U.S. Supreme Court in Students for Fair Admissions, Inc. v. President and Fellows of Harvard College, 601 U.S. 181 (2023) (Fourteenth Amendment applies "without regard to any difference of race, of color, or of nationality". P. 206.) Similar to the affirmative action programs held unconstitutional, the AHFA provisions "lack sufficiently focused and measurable

			objectives warranting the use of race, unavoidably employ race in a negative manner, involve racial stereotyping, and lack meaningful end points." P. 230. Executive Orders of the President also provide that preferences based on race or sex violate Federal civil rights laws. EO 14173, "Ending Illegal Discrimination and Restoring Merit-Based Opportunity", January 21, 2025. In part, the EO states: "Yet today, roughly 60 years after the passage of the Civil Rights Act of 1964, critical and influential institutions of American society . . . have adopted and actively use dangerous, demeaning, and immoral race- and sex-based preferences under the guise of so-called 'diversity, equity, and inclusion' (DEI) or 'diversity, equity, inclusion, and accessibility' (DEIA) that can violate the civil-rights laws of this Nation. Illegal DEI and DEIA policies not only violate the text and spirit of our longstanding Federal civil-rights laws, they also undermine our national unity, as they deny, discredit, and undermine the traditional American values of hard work, excellence, and individual achievement in favor of an unlawful, corrosive, and pernicious identity-based spoils system." The EO directs the head of each federal agency, including the Departments of Housing and Urban Development and Treasury, to include in every contract or grant award a term requiring the contractor or grant recipient to certify that they do not operate any programs promoting DEI that violate any applicable anti-discrimination laws and acknowledge that the certification is material for purposes of the government's payment decision and therefore subject to the False Claims Act. See 31 U.S.C. 3729(b)(4). Further, non-compliance puts at risk grants, such as those which fund the HOME Partnership Program. See also EO 14151, January 20, 2025, and EO 14148, January 20, 2025. In addition, such provisions appear to conflict with Alabama's Fiscal Responsibility and Economic Development Act 2023-409, which provides in part "no company in this state shall be required by a governmental entity to . . . establish or implement policies, procedures, guidelines, rules . . . that further social, political, or ideological interests . . . ." Sec. 4(a). Language added for 2025, excluding from consideration women and minorities with an identity of interest with other project participants, also discourages (and in some circumstances entirely prohibits) the involvement of family members, e.g., daughters, complicating succession planning in these highly illiquid real estate projects. Further, such limitation is unclear because it does not define with whom the prohibited identity of interest exists. Presumably, it is with others in ownership, consistent with the context of Section

			II(G)(4), and not every party to the project, which would, for instance, preclude an MBE responsible owner from participating in the transaction through the MBE's affiliated general contractor corporation.
Housing Credit	I	8-9	Non-refundable fees, missing or incomplete docs is currently $2000. A reasonable fee would be $1000 per occurance
Housing Credit	II	31	J. 3. On occasion the initial syndicator's pricing changes and another syndicator is more competitive by the time the project closes. Would suggest that changing syndicators should not be a negative action and when notifying AHFA of a change of syndicator there shouldn't be a penalty fee assessed.
Housing Credit	II	31	J.1. During plan reviews by cities, changes to the site configuration may occur to satisfy the reviewing entity. Would suggest that a change in the site configuration should not also carry with it a penalty fee if it varies from the original site plan submitted in the application so long as the overall intent of the application has been achieved.
Housing Credit	Point Scoring	6	iii.a.1. Consider adding additional avenues of funding to the list. Including but not limited to: community development financial institution (CDFI), any source with long-term AFR financing, or make the threshold for getting any points the $16,000/unit or $20,000/unit or higher.
Housing Credit	Point Scoring	9	vi.h. Consider changing the distance definition to radius instead of driving distance.
Housing Credit	Point Scoring	10	2.i. Awarding points based on someone's gender or ethnicity should be removed. This is discrimination as it is the unfair or prejudicial treatment of people and groups based on characteristics such as race, gender, age, or sexual orientation.
HOME	Compliance	31	Minority and women's Business Outreach should be removed as DEI policies have shown to be unconsitutional (see previous comment above).
HOME	Compliance	31	BABA Act should be removed from the requirements.
HOME	Point Scoring	6	iii.a. Consider adding additional avenues of funding to the list such as community development financial institution (CDFI).
HOME	Point Scoring	8	iii.a. Consider changing the distance definition to radius instead of driving distance.
HOME	Point Scoring	10	2. Awarding points based on someone's gender or ethnicity is should be removed as DEI policies have shown to be unconsitutional.
HTF	Section	5	BABA Act should be removed from the requirements.
General Comment	Section		Consider changing the release and commenting period of future Draft QAPs so they don't conflict with the application periods.
Housing Credit	II	20	E. 1. iii. Allow Basis Boost in all Rural Areas for new construction to make them more financially feasible.

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General Comment	Section		Vantage Development recommends AHFA insert language, such as an addendum for a supplemental funding round, additional credits, and/or other resource, in the 2026 QAP. This would give AHFA the flexibility to address funding and cost overrun issues that arise on previously funded projects. Proposed tariffs on foreign goods and mass deportations will likely cause an increase in construction materials and labor, and the possibility of lower corporate tax rates has the potential to impact equity pricing, which could negatively impact the feasibility of previously funded projects.
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3/7/2025

Name: Mary Ellen Judah Organization: Neighborhood Concepts, Inc. Email: mjudah@neighborhoodconcepts.org Phone: 256-534-0075 Ext 402

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	Point Scoring	6	Please consider allowing points to be earned for the assumption and/or extension of term on existing funding from AHFA' approved sources of funds. The assumed favorable financing reduces the project's overall debt service obligation which translates to rent affordability and increased leverage of the LIHTC. Alternatively, please consider allowing acq/rehab projects that secure approved sources of funding in advance of the application cycle as part of a preservation effort to receive points in this category
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3/7/2025

Name: Hunter Herrera-McFarland Organization: The Kelsey Email: Hunter@thekelsey.org Phone: 510-421-4056

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	I	3	We appreciate AHFA's commitment to prioritizing housing opportunities for disabled individuals, as this is a critical step toward ensuring greater equity in affordable housing. However, it is essential that housing policies and funding mechanisms fully reflect the needs of all disabled individuals, including those with higher support needs. Every person, regardless of the level of assistance they require, deserves access to stable, community-based housing that fosters independence and inclusion. Limiting affordable housing opportunities for individuals with higher support needs directly contradicts the principles outlined in the 1999 Olmstead ruling. This landmark decision affirmed the rights of disabled individuals to live in the most integrated setting possible and clarified the legal obligation of public entities to provide services in community-based settings rather than institutions. Restricting access to affordable housing for those with extensive support needs not only undermines this legal precedent but also perpetuates a system in which disabled people are unnecessarily institutionalized or forced into segregated environments due to a lack of available options. The urgency of this issue is underscored by the reality that disabled individuals face the highest rates of housing discrimination, are disproportionately priced out of the housing market, and are at an elevated risk of experiencing homelessness. Without intentional efforts to prioritize Housing Credit allocations for developments that include robust supportive services, the current pattern of exclusion, segregation, and institutionalization will persist.

			Given these challenges, we strongly urge AHFA to reassess its position that LIHTC program is not intended to serve disabled individuals requiring more than minimal supportive services. If LIHTC funding does not support developments that accommodate a full spectrum of support needs, then disabled individuals—particularly those with higher needs—will continue to be excluded from community-based housing opportunities.
Housing Credit	II	12	AHFA should only award tax credits to projects constructing at least 10% of units according to the 2021 International Building Code ANSI Type A standards. The ANSI Type A accessibility standard provides a higher level of accessibility than basic compliance requirements, offering design features that support aging in place and enable people with disabilities to live independently. Type A standards include adaptable features that support residents with limited mobility and allow for future modifications if a resident's needs change. Requiring even a small portion of units to meet these standards ensures a base level of accessibility across new projects, meeting immediate needs and allowing for long-term adaptability.
Housing Credit	Point Scoring		AHFA should incentivize the development of mixed-income housing that includes units designated for individuals with disabilities. By incorporating affordable, workforce, and market-rate housing within the same developments, Alabama can create inclusive communities that provide economic diversity, improve housing stability, and enhance access to services and opportunities. Additionally, the policy might include threshold requirements stating that all developments must include a minimum percentage of units for Extremely Low-Income (ELI) households (e.g., 10% at 30% AMI or below) to qualify for Low-Income Housing Tax Credits (LIHTCs).
Housing Credit	Point Scoring		AFHA should actively promote the development of housing communities that incorporate comprehensive supportive services tailored to the needs of tenants with disabilities, individuals experiencing homelessness, and families with young children. Integrating robust supportive services within affordable housing developments is essential to ensuring housing stability, fostering long-term resident retention, and improving overall health outcomes. As of the latest available information, Alabama remains the sole state whose Housing Credit agency does not offer specific scoring incentives for supportive housing in its QAP.

			A key benefit of embedding supportive services within housing is the facilitation of access to federally and state-funded Home and Community-Based Services (HCBS). These services provide critical assistance, such as support with daily household tasks (e.g., meal preparation, cleaning, financial management) and community integration services (e.g., transportation to medical appointments, job placement and coaching). Without access to these essential supports, individuals may face unnecessary institutionalization in settings such as hospitals, group homes, or emergency shelters, limiting their autonomy and quality of life. Funding mechanisms, including Medicaid waiver programs such as In-Home Supportive Services (IHSS) and other community-based initiatives, explicitly uphold the right of people with disabilities to receive self-directed services in their own homes. These programs align with federal disability rights protections that emphasize community living as a fundamental principle. However, without dedicated service coordination and case management embedded within housing developments, many eligible residents may struggle to navigate and access these critical programs. Ensuring on-site or closely integrated supportive services empowers residents to maintain independent living and thrive in their communities. By prioritizing housing models that seamlessly integrate supportive services, AFHA can drive equitable housing solutions that enhance self-sufficiency, prevent unnecessary institutionalization, and promote the long-term well-being of vulnerable populations.
Housing Credit	Point Scoring	37	Tenant Needs: We strongly recommend increasing the set-aside requirement from a minimum of up to 7% to a minimum of 10% to begin addressing the severe housing shortage for people with disabilities. Alabama has waitlists for accessible units far exceeding availability. Increasing the set-aside to 10% ensures a more significant impact in addressing this gap. There is also significant overlap between homelessness and disability, with over 40% of people experiencing homelessness having a disability. By increasing the set-aside to 10%, the policy ensures housing solutions that better serve both priority groups. Lastly, a 10% set-aside demonstrates a proactive commitment to federal and state Fair Housing goals, aligning with Olmstead principles and efforts to increase community-based living options for people with disabilities.
Housing Credit	II		To incentivize the development of accessible, supportive housing for individuals with disabilities , AHFA should consider

			the creation of a dedicated Accessibility Supportive Housing (ASH) Pool for future QAPs, modeled after Virginia's QAP. This pool would prioritize projects that commit to a minimum of 15% of units for individuals with disabilities who use supportive services, ensuring compliance with HUD Section 504 accessibility standards and integrating project-based rental assistance to enhance affordability. Developments meeting these criteria would receive priority consideration in the LIHTC scoring process, increasing their competitive viability. To ensure long-term compliance, the program would implement a monitoring and tracking system to assess accessibility, affordability, and service integration. Expected outcomes include an increased supply of accessible, affordable housing, greater developer engagement in disability-inclusive housing initiatives, and improved state compliance with federal accessibility and fair housing mandates.
Plan	Point Scoring	37	One of the persistent challenges in accessible housing is ensuring that individuals with disabilities are aware of and able to secure available units that meet their needs. Without affirmative outreach and marketing strategies, accessible these units often fail to reach their intended residents. To ensure equitable access, Alabama's QAP should require developers to affirmatively market accessible units to disability communities and organizations led by and serving people with disabilities and older adults. This proactive leasing approach should apply both during the initial lease-up phase of new developments and whenever accessible units become available. Additionally, AHFA should require evidence of due diligence to lease units set aside for disabled/homeless individuals before they are made available to the general public and extend the time to 60 days. We learned in our community engagement process that many accessible units are not going to disabled individuals because either the marketing strategy is failing or housing providers and public entities need more time to go through their waitlist and find the tenants that need the unit the most. There should be explicit marketing guidelines, referral partners and rubrics to ensure that developers who are taking advantage of these points are doing everything within their power to house disabled individuals.
Plan	Point Scoring	37	Developers should not be able to claim points for setting aside units for special populations without demonstrating a clear,

			actionable plan for how their project will meet the specific needs of both disabled individuals and homeless individuals. Simply designating a certain number of units to these populations without detailing accessibility features, service coordination, or affordability levels risks creating developments that fail to provide meaningful support. A strong QAP should require developers to outline specific design elements, such as ADA-compliant units, universal design features, and integrated supportive services, to ensure that people with disabilities have housing that truly meets their needs. Similarly, developers should be required to demonstrate a commitment to a housing-first approach, incorporating case management, mental health and substance use services, and connections to employment and social supports. Requiring clear, enforceable commitments would prevent developers from using this category to score additional points while failing to deliver targeted solutions.
Plan	Point Scoring	16	The QAP does not sufficiently incentivize developments in well-connected, transit-rich areas. As a result, many affordable housing projects are built in low-resource neighborhoods where land is more affordable, but residents face increased isolation from essential services, employment opportunities, healthcare, and public transportation. To address this issue, the QAP should award additional points to projects located within half a mile of transit hubs, major employment centers, healthcare facilities, and grocery stores. This policy change would promote greater access to opportunity and improve the long-term outcomes for residents of affordable housing developments.
Plan	Point Scoring	12	Tenant needs should hold a higher weight in the QAP scoring system for several key reasons: 1. Aligning with the Core Mission of Affordable Housing The primary goal of the Housing Credit program is to serve low-income and vulnerable populations. Prioritizing tenant needs ensures that housing developments are designed to address the specific challenges faced by residents. A higher weight for tenant needs would reinforce this mission. 2. Ensuring Long-Term Viability and Stability Developments that prioritize tenant needs—such as integrated supportive services, accessibility features, and community engagement—tend to have lower turnover rates and better long-term sustainability. A scoring system that gives more points to tenant-centered initiatives would promote stable, successful housing.

			3. Reducing Housing Insecurity and Homelessness Many low-income tenants, including those with disabilities, seniors, and families with children, face significant barriers to stable housing. A higher weight for tenant needs could incentivize developers to create units with deeper affordability, dedicated housing for people with disabilities, and on-site services that help tenants remain housed. 4. Encouraging Inclusive and Equitable Development Developers often prioritize financial feasibility, which can lead to projects that do not fully meet the needs of the most vulnerable populations. By increasing the weight of tenant needs, the QAP would push developers to incorporate more inclusive design elements, such as accessible units, universal design principles, and family-friendly layouts. 5. Enhancing Health and Quality of Life Affordable housing is not just about providing shelter—it should also support the well-being of tenants. Developments that incorporate health-focused initiatives, like access to healthcare, mental health services, and nutritional programs, contribute to improved outcomes for residents. Higher weighting of tenant needs would encourage developers to include such services. 6. Better Use of Public Resources Since the Housing Credit program is a public investment, ensuring that it effectively serves those with the greatest needs should be a top priority. A higher point allocation for tenant needs would direct resources toward projects that provide the most meaningful social and economic impact. By increasing the weight of tenant needs in the QAP, Alabama can better align its affordable housing strategy with broader goals of equity, inclusion, and long-term housing stability.
Plan	I	6	The QAP should recognize Section 811 Capital Advance as an eligible source of financial leverage when awarding points for financing commitments. Currently, Section 811 funding is not counted toward financial leverage, despite its role in providing long-term rental assistance for people with disabilities. Including Section 811 as a qualifying funding source would encourage more developers to incorporate deeply affordable and supportive housing units into their projects, expanding housing opportunities for individuals with disabilities while strengthening the overall financial viability of developments.
Plan	Point Scoring	4	For urban infill sites, excessive parking requirements impose unnecessary financial and spatial burdens on developments, increasing construction costs, reducing available land for housing, and contradicting modern urban planning principles. These requirements are particularly impractical in areas where

			alternative transportation options are expanding and car dependency is declining. Recognizing this shift, the City of Birmingham eliminated parking minimums in May 2024, demonstrating a commitment to fostering more sustainable, accessible, and affordable development patterns. Both the City and this project are actively investing in multimodal transportation infrastructure—including improved public transit, pedestrian pathways, and bike-friendly amenities—that support car-light living. This approach is especially beneficial in walkable, amenity-rich neighborhoods, where residents can conveniently access essential services, employment opportunities, and recreational spaces without relying on personal vehicles. Reducing or eliminating unnecessary parking requirements in such contexts ensures that housing remains more affordable, land use is optimized, and communities are better equipped to meet evolving transportation needs.
Plan	II	15	Currently, the construction standards within the QAP are structured in a way that strongly incentivizes the development of garden-style apartments and townhomes as the most feasible housing types. This approach limits the flexibility needed to support a diverse range of housing solutions, particularly in urban and high-demand areas where land constraints, density needs, and accessibility considerations require more compact, multi-story, or mixed-use developments. To better align with evolving housing needs, Alabama's QAP should include construction standards that encourage a wider variety of development types, including mid-rise and mixed-use buildings.
General Comment	Section		Remove requirement for telephone service letters as part of the application process. The use of land-line telephones is virtually non-existant and this letter continues to be increaslingly difficult to obtain.
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3/7/2025

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Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	II	16	Site Location: We agree it is appropriate for AHFA to consider the status of recently funded projects when considering potential allocations for new projects that may be located in the same market area. Preventing market oversaturation is a desirable policy goal; however, we suggest that the ban on funding proposed projects within a 2-mile radius of existing projects that have not achieved AHFA's occupancy standards (for new construction 90% and rehabs 50%) be updated to projects of the same residency tenure. For example, a family/general occupancy development that is under construction and is not yet fully occupied should not trigger the 2 mile radius requirement if the proposed project under consideration serves an age restricted tenancy and/or a permanent supportive housing resident base. This of course assumes that demand for the proposed project is also demonstrated in the market study. AHFA may also consider reducing the 2mile radius to 1 mile in urban high demand areas.
Housing Credit	II	17	Multifamily Housing Revenue Bonds: We believe it is in AHFA's interest to create a regulatory environment that encourages the most talented, experienced and best capitalized LIHTC developers to work in Alabama. We wholeheartedly agree that past successful tax credit development experience is one of the strongest indicators of the future success of an affordable housing development. We further recognize that multifamily bond developments are inherently more challenging than competitive 9% developments, largely due to the scale of these developments and the more limited subsidy available. We believe it is reasonable that AHFA limit the number of applications that a true first-time LIHTC developer can submit if they have not previously and successfully financed, developed, built, and delivered affordable units to

			market. We believe that AHFA's policy as drafted, which prohibits "any applicant having a single (first time AHFA funded) Multifamily Housing Revenue Bond Project" from submitting a first-time competitive application [9% LIHTC] until the bond project is complete, 90% occupied and having completed a 3rd party construction inspection may be appropriate for a true first-time LIHTC developers but discourages experienced developers that have yet to do work yet in Alabama from investing in infrastructure and development pipeline that would benefit the state's low income residents. We strongly encourage AHFA to give positive consideration to applicants with demonstrated LIHTC experience gained out-of-state and permit them to submit multiple applications. For context, Lincoln Avenue Communities (as well as other high-capacity developer peers) has successfully developed and delivered dozens of LIHTC and bond developments across the country in recent years. We have dedicated teams to handle all aspects of the development process including design and construction management team, financial management, asset management and a deep bench of more than 115 development and project management professionals. Furthermore, LAC works exclusively with high-capacity property management firms that have been approved to work in the state and also have a demonstrated capacity to deliver multiple projects simultaneously. LAC has been further recognized by our financial partners for our capacity to work at scale. For example, we have been vetted and designated by Freddie Mac as an Impact Sponsor. We share this resume to emphasize that some "first-time applicants" bring substantive, demonstrated experience that should deserve different treatment than the language that is currently in the QAP. Unfortunately, this year we have declined to pursue several competitive and highly impactful affordable housing development opportunities in Alabama because of the current first-time AHFA funded language in the QAP limiting us to just a single bond application. Given the current affordable housing crisis, we believe it is in the best interest of AHFA and low-income residents across the state to incentivize high-capacity developers that can demonstrate capacity to invest in the state and, when possible, to do so at scale. We recommend that AHFA waive the current first time AHFA funded language for experienced LIHTC developers. We suggest that a developer that can demonstrated that it has successfully placed in service and received 8609s at 8-10 LIHTC projects (regardless of location) over the past 3 years should give AHFA confidence of their ability to successfully manage

			multiple developments and at a minimum be able to submit a simultaneous competitive 9% application.
Housing Credit	II	23	Developer Fee: Construction materials pricing and supply chain disruptions continue to be a significant challenge to financing affordable housing in Alabama. The industry is also experiencing significant inflation in the cost of insurance and land prices and building acquisition costs remain stubbornly high and labor costs are a significant barrier to financing and delivering quality affordable housing communities to the market. The compelling financial attribute of the four percent LIHTC program is the “as of right” credits that come with meeting the IRC Section 142 requirements along with the threshold requirements set forth in AHFA’s QAP. While PAB volume cap is a limited resource, the credits associated with Tax-Exempt Bond (TEB) transactions are only limited by the amount of eligible basis. This is a significant difference from the nine percent LIHTC program where the allocation of annual credit authority is capped. We recommend that AHFA take proactive steps in its QAP to maximize eligible basis at properties financed with private activity bonds and 4% LIHTCs, which in turn will generate additional tax credits and make more projects financially feasible with TEBs. From a practical perspective, increasing developer fees in a rising cost environment, as we are experiencing today, generates additional eligible basis and additional tax credit equity. This can be particularly impactful on 4% bond transactions where the LIHTCs are capped by eligible basis rather than an annual state ceiling. Maximizing developer fees, within the constraints of the tax law, regulation, and reasonable underwriting, is a proven and successful method of generating additional LIHTC eligible basis, and in turn, equity proceeds which help fill project gaps and/or reduce the need to obtain state gap financing resources. We defer a substantial portion of our developer fees to fill project gaps. We also believe it is important to acknowledge the role developer fees play in affordable housing transactions as well when you consider the appropriate fee setting mechanism. 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. Furthermore, unlike with the 9% program, there is no mechanism to provide additional supplemental allocations of LIHTCS to fill project gaps under exigent circumstances.

			We believe that a 15% developer fee for bond-financed projects is low, as compared to your peer state housing finance agencies. The following states all permit high-developer fees for TEB financed projects and include the total development costs in the fee calculations: Tennessee (25%), Oklahoma (20%), Ohio (20%), Arizona (19%) and Wisconsin (20%). 1. We recommend the AHFA to raise the developer fee for bond financed deals from 15% of total development costs to a flat 20% of total development costs (excluding the developer fee and reserves). 2. We further recommend that AHFA require developers of bond financed projects to defer all developer fee above 15% or at least 20% of the total developer fee, whichever is greater. Additionally, we recommend raising the cap on developer fee for acquisition costs from 8% to the final adopted ceiling. 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.
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Housing Credit	II	18	Negative Actions: We generally support that the list of negative actions that can result in an application disqualification; however, recognizing that development conditions can be fluid, we urge AHFA to make a small but important qualification - namely, to allow for the change of a GC, Management Company, etc. if prior permission is granted by AHFA.
Housing Credit	II	18	Volume Cap Recylcing: Although it is not a QAP item per se, we encourage AHFA to consider setting up a multifamily private activity bond recycling program as soon as possible. We are hopeful that Congress will enact legislation to reduce the 50% aggregate bond test to 30% in the current legislative session. This will allow HFAs like AHFA to conserve PAB volume cap as demand for affordable housing increases. On a traditional 4% TEB transaction, as the capital stack is structured to be scaled to the current 50% test and increasing amount of the debt proceeds are replaced with taxable debt. In normal yield-curve environments taxable debt carries a higher interest rate, reducing the amount of debt proceeds available to finance affordable housing. Establishing a multifamily residential rental housing bond recycling program benefits multiple stakeholders including:

			• The borrower, who benefits with lower interest rates and increased proceeds. • The state HFA, which benefits from larger issuances and increased fees associated with large transactions. • And most importantly, low-income individuals and families will benefit from increased affordable housing production. With the creation of the State Tax Credit, PAB cap has become a more competitive. Establishing a bond recycling program today positions AHFA for future. The 2008 Housing and Economic Recovery Act (HERA) which authorizes the reuse or “recycling” of multifamily private activity bond volume cap to finance new affordable multifamily rental housing projects under certain conditions. Such “recycled” bond volume does not entitle the new project to which it is allocated to qualify for 4% low-income housing tax credits; however, as stated above it produces a much lower borrowing rate in many transactions, enhanced feasibility. There are several due diligence steps an HFA must evaluate before enacting a recycling program – the most important being whether the issuer has issued a sufficient volume of tax-exempt bond in previous years that there are sufficient projected pay downs or pay offs that volume that can be recycled and justify the costs of setting up a program. Based on our analysis of IHCDA multifamily bond issuances over the past several years, we believe it is sufficient and warranted. There are several HFAs around the country that have effectively implemented bond recycling programs to significant effect including Colorado, Minnesota, Washington, California, and Massachusetts should AHFA be interested in seeing successful implementations. We would be happy to share additional technical resources as well if AHFA is interested in learning more.
Housing Credit	Point Scoring	5 Addendum A	Emergency Pull Cords / Call Button: The use of emergency pull cords in affordable housing properties has created significant operational challenges is no longer the standard of practice at senior properties, largely because of the liability issues they can create. Increasingly, many casualty insurers are unwilling to write insurance policies for properties with pull cords / call buttons or will do so at exorbitant rates. As insurance costs continue to rise, we recommend that AHFA eliminate the points currently made available for Emergency Pull Cords/Call Buttons.
Housing Credit	Point Scoring	6 Addendum A	AHFA Approved Sources Points: We believe it is good policy to encourage outside financial leverage. We urge AHFA to consider expanding its list of AHFA-approved sources of new

			funds to also include grant and/or subordinate financing from 501(c)3 non-profits.
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3/7/2025

Name: Jason Freeman Organization: Gateway Development Corporation Email: jfreeman@gatewaymgt.com
Phone: 256-760-9657

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	ENV Policy		We are requesting that AHFA adopt the requirements per the HUD Noise Standards and that only these standards be implemented moving forward. a. AHFA adopt the following HUD Environmental Standards: i. Permit the use of engineering and institutional controls to mitigate environmental conditions as addressed under HUD Multifamily Accelerated Processing (MAP) Guide; Section 9.4.5 (D)(1): Engineering and Institutional Controls (EC/IC): An Engineering Control is a physical measure that reduces or eliminates exposure to contamination. An Institutional Control is a non-engineered instrument, such as administrative and legal control. ICs typically limit land and/or resource use or provide information that helps modify or guide human behavior at a site. An appropriate mix of ECs such as capping and slurry walls, and ICs such as protective covenants, access restrictions and tenant and employee notification, are usually required for all RBCAs or other accepted cleanup program as approved by the LSTF authority. ii. Do not impose exterior noise standards at the property line. Per 24CFRPart 51, Subpart B; 51.103(c)(1): Exterior standards. (1) The degree of acceptability of the noise environment at a site is determined by the sound levels external to buildings or other facilities containing noise sensitive uses. The standards shall usually apply at a location 2 meters (6.5 feet) from the building housing noise sensitive activities in the direction of the predominant noise source. Where the building location is undetermined, the standards shall apply 2 meters (6.5 feet) from the building setback line nearest to the predominant noise source. The standards shall also apply at other locations where it is determined that quiet

			outdoor space is required in an area ancillary to the principal use on the site. b. Remove meeting Environmental Policy Requirements as a Threshold item: The conclusions of such assessments are based on the professional opinion of Environmental Professionals (EPs) who sign the reports. The EPs firms are licensed and insured. AHFA is provided with a reliance letter for the reports, including specific insurance requirements. If AHFA or their retained attorneys or environmental consultant(s) have a difference of opinion, all parties should be permitted to resolve the differences of opinion within an adequately allotted appeal timeframe. If AHFA is not open to removing environmental as a Threshold item, consider leaving it as Threshold relative to the identification of recognized environmental conditions (RECs), but allow for differences of opinion relative to scopes of Phase II Environmental Assessments to be addressed between the parties, or resolved by getting a third environmental professional to opine.
Housing Credit	II	12	Status of Previously Funded Projects - remove the requirement for previously funded projects to meet 50% construction complete to be eligible for competition in the next 9% tax credit round. Suggestion: Tax Credit developments must have closed construction/equity for current round eligibility. AHFA HOME deals have 180 days after receiving NEPA clearance to close construction/equity for current round eligibility.
Housing Credit	Point Scoring	A-10	Applicant Characteristics (i) states that 10 points will be given to applicants with participation of minorities or women. This applies in part to ownership composition and in part to contracting set asides. Minorities are defined as certain racial or ethnic categories. The Alabama Affordable Housing Association strongly supports an inclusive affordable housing industry and encourages AHFA to look for appropriate means to support and encourage participation in its programs by women and minorities within constitutional limits. However, the proposed provisions should be reconsidered in light of current law. This provision for additional points based expressly upon race and sex categories appears to violate the Equal Protection Clause of the United States Constitution, as construed by the U.S. Supreme Court in Students for Fair Admissions, Inc. v. President and Fellows of Harvard College, 601 U.S. 181 (2023) (Fourteenth Amendment applies "without regard to any difference of race, of color, or of nationality". P. 206.) Similar to the affirmative action programs held unconstitutional, the AHFA provisions "lack sufficiently focused and measurable

			objectives warranting the use of race, unavoidably employ race in a negative manner, involve racial stereotyping, and lack meaningful end points." P. 230. Executive Orders of the President also provide that preferences based on race or sex violate Federal civil rights laws. EO 14173, "Ending Illegal Discrimination and Restoring Merit-Based Opportunity", January 21, 2025. In part, the EO states: "Yet today, roughly 60 years after the passage of the Civil Rights Act of 1964, critical and influential institutions of American society . . . have adopted and actively use dangerous, demeaning, and immoral race- and sex-based preferences under the guise of so-called 'diversity, equity, and inclusion' (DEI) or 'diversity, equity, inclusion, and accessibility' (DEIA) that can violate the civil-rights laws of this Nation. Illegal DEI and DEIA policies not only violate the text and spirit of our longstanding Federal civil-rights laws, they also undermine our national unity, as they deny, discredit, and undermine the traditional American values of hard work, excellence, and individual achievement in favor of an unlawful, corrosive, and pernicious identity-based spoils system." The EO directs the head of each federal agency, including the Departments of Housing and Urban Development and Treasury, to include in every contract or grant award a term requiring the contractor or grant recipient to certify that they do not operate any programs promoting DEI that violate any applicable anti-discrimination laws and acknowledge that the certification is material for purposes of the government's payment decision and therefore subject to the False Claims Act. See 31 U.S.C. 3729(b)(4). Further, non-compliance puts at risk grants, such as those which fund the HOME Partnership Program. See also EO 14151, January 20, 2025, and EO 14148, January 20, 2025. In addition, such provisions appear to conflict with Alabama's Fiscal Responsibility and Economic Development Act 2023-409, which provides in part "no company in this state shall be required by a governmental entity to . . . establish or implement policies, procedures, guidelines, rules . . . that further social, political, or ideological interests . . . ." Sec. 4(a). Language added for 2025, excluding from consideration women and minorities with an identity of interest with other project participants, also discourages (and in some circumstances entirely prohibits) the involvement of family members, e.g., daughters, complicating succession planning in these highly illiquid real estate projects. Further, such limitation is unclear because it does not define with whom the prohibited identity of interest exists. Presumably, it is with others in ownership, consistent with the context of Section

 B.8

			II(G)(4), and not every party to the project, which would, for instance, preclude an MBE responsible owner from participating in the transaction through the MBE's affiliated general contractor corporation.
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Housing Credit	Point Scoring	6	iii.a.1. Consider adding additional avenues of funding to the list. Including but not limited to: community development financial institution (CDFI), any source with long-term AFR financing, or make the threshold for getting any points the $16,000/unit or $20,000/unit or higher.
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Housing Credit	Point Scoring	10	2.i. Awarding points based on someone's gender or ethnicity should be removed. This is discrimination as it is the unfair or prejudicial treatment of people and groups based on characteristics such as race, gender, age, or sexual orientation.
HOME	Compliance	31	Minority and women's Business Outreach should be removed as DEI policies have shown to be unconsitutional (see previous comment above).
Plan	Section		
HOME	Point Scoring	6	iii.a. Consider adding additional avenues of funding to the list such as community development financial institution (CDFI).
HOME	Point Scoring	8	iii.a. Consider changing the distance definition to radius instead of driving distance.
HOME	Point Scoring	10	2. Awarding points based on someone's gender or ethnicity is should be removed as DEI policies have shown to be unconsitutional.
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Housing Credit	II	20	E. 1. iii. Allow Basis Boost in all Rural Areas for new construction to make them more financially feasible.
General Comment	Section		AAHA recommends AHFA insert language, such as an addendum for a supplemental funding round, additional credits, and/or other resource, in the 2026 QAP. This would give AHFA the flexibility to address funding and cost overrun issues that arise on previously funded projects. Proposed tariffs on foreign goods and mass deportations will likely cause an increase in construction materials and labor, and the possibility of lower corporate tax rates has the potential to impact equity pricing, which could negatively impact the feasibility of previously funded projects.
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3/7/2025

Name: Ryan Emerick Organization: Knight Development Email: remerick@knightdevco.com Phone: (559) 642-7405

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	I	6	Many Public Housing Authorities and Rural Development properties are interested in submitting low-income housing tax credit applications to rehabilitate their aging portfolios. Many housing authorities in Alabama that were developed early after the National Housing Act of 1934 have never seen significant renovation. In an effort to deconcentrate minority and poverty, many public housing sites were scattered across a city or county. The public housing developments are going through a transformative process that includes asset repositioning through Rental Assistance Demonstration (RAD) and Section 18 Disposition which, when paired with private equity through low-income housing tax credit, is a beneficial public private partnership used to preserve affordable housing. When public housing authorities convert from public housing to Section 8, they continue to target the most vulnerable population, at 30% of the area median income (AMI). Under the current Alabama Housing Credit policy, a project that includes scattered sites is not allowed. This creates a suboptimal situation that makes it extremely difficult for many agencies and low-income residents to receive the investment of private funds needed for rehabilitation and preservation of affordable housing. The communities and the tenants that call these units home deserve the right to be included in funding opportunities. It is recommended that AFHA alter the language to allow scattered site.
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3/7/2025

Name: Holly Knight Organization: Knight Development Email: hknight@knightdevco.com Phone: 202-699-1998

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	I	6	Many Public Housing Authorities and Rural Development properties are interested in submitting low-income housing tax credit applications to rehabilitate their aging portfolios. Many housing authorities in Alabama that were developed early after the National Housing Act of 1937 have never seen a significant renovation. In an effort to deconcentrate minority and poverty, many public housing sites were scattered across a city or county. The public housing developments are going through a transformative process that includes asset repositioning through Rental Assistance Demonstration (RAD) and Section 18 Disposition which, when paired with private equity through low-income housing tax credit, is a beneficial public private partnership used to preserve affordable housing. When public housing authorities convert from public housing to Section 8, they continue to target the most vulnerable population, at 30% of the area median income (AMI). By sharing project costs, two smaller public housing authorities, paired with a larger authority, could work together to convert through RAD and renovate their development. If scattered sites were allowed, then more low-income families could be served. We recommend that the Housing Credit Plan encourage collaborative efforts to reach low-income families across a wide spectrum of communities. Under the current Alabama Housing Credit policy, a project that includes scattered sites is not allowed. This creates a suboptimal situation that makes it extremely difficult for many agencies and low-income residents to receive the investment of private funds needed for rehabilitation and preservation of affordable housing. The communities and the tenants that call

			these units home deserve the right to be included in funding opportunities. It is recommended that AFHA alter the language to allow scattered site projects.
Housing Credit	I	6	Clarify in the QAP that single site restriction only applies to the 9% tax credit.
General Comment	Section		Scattered site within a project will promote the deconcentration of poverty which is central to affordable housing policy. Deconcentration of poverty assists with creating income diversity in a new or redeveloped affordable housing projects. Scattered site developments should also be allowed in the Multifamily Bond Allocation Policy.
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3/7/2025

Name: Eric M Peebles, PhD Organization: Accessible Alabama Email: Eric@accessiblealabama.org Phone: 334-728-1310

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	I	3	We appreciate AHFA's commitment to prioritizing housing opportunities for disabled individuals, as this is a critical step toward ensuring greater equity in affordable housing. However, it is essential that housing policies and funding mechanisms fully reflect the needs of all disabled individuals, including those with higher support needs. Every person, regardless of the level of assistance they require, deserves access to stable, community-based housing that fosters independence and inclusion. Limiting affordable housing opportunities for individuals with higher support needs directly contradicts the principles outlined in the 1999 Olmstead ruling. This landmark decision affirmed the rights of disabled individuals to live in the most integrated setting possible and clarified the legal obligation of public entities to provide services in community-based settings rather than institutions. Restricting access to affordable housing for those with extensive support needs not only undermines this legal precedent but also perpetuates a system in which disabled people are unnecessarily institutionalized or forced into segregated environments due to a lack of available options. The urgency of this issue is underscored by the reality that disabled individuals face the highest rates of housing discrimination, are disproportionately priced out of the housing market, and are at an elevated risk of experiencing homelessness. Without intentional efforts to prioritize Housing Credit allocations for developments that include robust supportive services, the current pattern of exclusion, segregation, and institutionalization will persist.

			Given these challenges, we strongly urge AHFA to reassess its position that LIHTC program is not intended to serve disabled individuals requiring more than minimal supportive services. If LIHTC funding does not support developments that accommodate a full spectrum of support needs, then disabled individuals—particularly those with higher needs—will continue to be excluded from community-based housing opportunities.
Housing Credit	II	12	AHFA should only award tax credits to projects constructing at least 10% of units according to the 2021 International Building Code ANSI Type A standards. The ANSI Type A accessibility standard provides a higher level of accessibility than basic compliance requirements, offering design features that support aging in place and enable people with disabilities to live independently. Type A standards include adaptable features that support residents with limited mobility and allow for future modifications if a resident’s needs change. Requiring even a small portion of units to meet these standards ensures a base level of accessibility across new projects, meeting immediate needs and allowing for long-term adaptability.
Housing Credit	Point Scoring		AHFA should incentivize the development of mixed-income housing that includes units designated for individuals with disabilities. By incorporating affordable, workforce, and market-rate housing within the same developments, Alabama can create inclusive communities that provide economic diversity, improve housing stability, and enhance access to services and opportunities. Additionally, the policy might include threshold requirements stating that all developments must include a minimum percentage of units for Extremely Low-Income (ELI) households (e.g., 10% at 30% AMI or below) to qualify for Low-Income Housing Tax Credits (LIHTCs).
Housing Credit	Point Scoring		AFHA should actively promote the development of housing communities that incorporate comprehensive supportive services tailored to the needs of tenants with disabilities, individuals experiencing homelessness, and families with young children. Integrating robust supportive services within affordable housing developments is essential to ensuring housing stability, fostering long-term resident retention, and improving overall health outcomes. As of the latest available information, Alabama remains the sole state whose Housing Credit agency does not offer specific scoring incentives for supportive housing in its QAP.

			A key benefit of embedding supportive services within housing is the facilitation of access to federally and state-funded Home and Community-Based Services (HCBS). These services provide critical assistance, such as support with daily household tasks (e.g., meal preparation, cleaning, financial management) and community integration services (e.g., transportation to medical appointments, job placement and coaching). Without access to these essential supports, individuals may face unnecessary institutionalization in settings such as hospitals, group homes, or emergency shelters, limiting their autonomy and quality of life. Funding mechanisms, including Medicaid waiver programs such as In-Home Supportive Services (IHSS) and other community-based initiatives, explicitly uphold the right of people with disabilities to receive self-directed services in their own homes. These programs align with federal disability rights protections that emphasize community living as a fundamental principle. However, without dedicated service coordination and case management embedded within housing developments, many eligible residents may struggle to navigate and access these critical programs. Ensuring on-site or closely integrated supportive services empowers residents to maintain independent living and thrive in their communities. By prioritizing housing models that seamlessly integrate supportive services, AFHA can drive equitable housing solutions that enhance self-sufficiency, prevent unnecessary institutionalization, and promote the long-term well-being of vulnerable populations.
Housing Credit	Point Scoring	37	Tenant Needs: We strongly recommend increasing the set-aside requirement from a minimum of up to 7% to a minimum of 10% to begin addressing the severe housing shortage for people with disabilities. Alabama has waitlists for accessible units far exceeding availability. Increasing the set-aside to 10% ensures a more significant impact in addressing this gap. There is also significant overlap between homelessness and disability, with over 40% of people experiencing homelessness having a disability. By increasing the set-aside to 10%, the policy ensures housing solutions that better serve both priority groups. Lastly, a 10% set-aside demonstrates a proactive commitment to federal and state Fair Housing goals, aligning with Olmstead principles and efforts to increase community-based living options for people with disabilities.
Housing Credit	II		To incentivize the development of accessible, supportive housing for individuals with disabilities , AHFA should consider

			the creation of a dedicated Accessibility Supportive Housing (ASH) Pool for future QAPs, modeled after Virginia's QAP. This pool would prioritize projects that commit to a minimum of 15% of units for individuals with disabilities who use supportive services, ensuring compliance with HUD Section 504 accessibility standards and integrating project-based rental assistance to enhance affordability. Developments meeting these criteria would receive priority consideration in the LIHTC scoring process, increasing their competitive viability. To ensure long-term compliance, the program would implement a monitoring and tracking system to assess accessibility, affordability, and service integration. Expected outcomes include an increased supply of accessible, affordable housing, greater developer engagement in disability-inclusive housing initiatives, and improved state compliance with federal accessibility and fair housing mandates.
Plan	Point Scoring	37	One of the persistent challenges in accessible housing is ensuring that individuals with disabilities are aware of and able to secure available units that meet their needs. Without affirmative outreach and marketing strategies, accessible these units often fail to reach their intended residents. To ensure equitable access, Alabama's QAP should require developers to affirmatively market accessible units to disability communities and organizations led by and serving people with disabilities and older adults. This proactive leasing approach should apply both during the initial lease-up phase of new developments and whenever accessible units become available. Additionally, AHFA should require evidence of due diligence to lease units set aside for disabled/homeless individuals before they are made available to the general public and extend the time to 60 days. We learned in our community engagement process that many accessible units are not going to disabled individuals because either the marketing strategy is failing or housing providers and public entities need more time to go through their waitlist and find the tenants that need the unit the most. There should be explicit marketing guidelines, referral partners and rubrics to ensure that developers who are taking advantage of these points are doing everything within their power to house disabled individuals.
Plan	Point Scoring	37	Developers should not be able to claim points for setting aside units for special populations without demonstrating a clear,

			actionable plan for how their project will meet the specific needs of both disabled individuals and homeless individuals. Simply designating a certain number of units to these populations without detailing accessibility features, service coordination, or affordability levels risks creating developments that fail to provide meaningful support. A strong QAP should require developers to outline specific design elements, such as ADA-compliant units, universal design features, and integrated supportive services, to ensure that people with disabilities have housing that truly meets their needs. Similarly, developers should be required to demonstrate a commitment to a housing-first approach, incorporating case management, mental health and substance use services, and connections to employment and social supports. Requiring clear, enforceable commitments would prevent developers from using this category to score additional points while failing to deliver targeted solutions.
Plan	Point Scoring	16	The QAP does not sufficiently incentivize developments in well-connected, transit-rich areas. As a result, many affordable housing projects are built in low-resource neighborhoods where land is more affordable, but residents face increased isolation from essential services, employment opportunities, healthcare, and public transportation. To address this issue, the QAP should award additional points to projects located within half a mile of transit hubs, major employment centers, healthcare facilities, and grocery stores. This policy change would promote greater access to opportunity and improve the long-term outcomes for residents of affordable housing developments.
Plan	Point Scoring	12	Tenant needs should hold a higher weight in the QAP scoring system for several key reasons: 1. Aligning with the Core Mission of Affordable Housing The primary goal of the Housing Credit program is to serve low-income and vulnerable populations. Prioritizing tenant needs ensures that housing developments are designed to address the specific challenges faced by residents. A higher weight for tenant needs would reinforce this mission. 2. Ensuring Long-Term Viability and Stability Developments that prioritize tenant needs—such as integrated supportive services, accessibility features, and community engagement—tend to have lower turnover rates and better long-term sustainability. A scoring system that gives more points to tenant-centered initiatives would promote stable, successful housing.

			3. Reducing Housing Insecurity and Homelessness Many low-income tenants, including those with disabilities, seniors, and families with children, face significant barriers to stable housing. A higher weight for tenant needs could incentivize developers to create units with deeper affordability, dedicated housing for people with disabilities, and on-site services that help tenants remain housed. 4. Encouraging Inclusive and Equitable Development Developers often prioritize financial feasibility, which can lead to projects that do not fully meet the needs of the most vulnerable populations. By increasing the weight of tenant needs, the QAP would push developers to incorporate more inclusive design elements, such as accessible units, universal design principles, and family-friendly layouts. 5. Enhancing Health and Quality of Life Affordable housing is not just about providing shelter—it should also support the well-being of tenants. Developments that incorporate health-focused initiatives, like access to healthcare, mental health services, and nutritional programs, contribute to improved outcomes for residents. Higher weighting of tenant needs would encourage developers to include such services. 6. Better Use of Public Resources Since the Housing Credit program is a public investment, ensuring that it effectively serves those with the greatest needs should be a top priority. A higher point allocation for tenant needs would direct resources toward projects that provide the most meaningful social and economic impact. By increasing the weight of tenant needs in the QAP, Alabama can better align its affordable housing strategy with broader goals of equity, inclusion, and long-term housing stability.
Plan	I	6	The QAP should recognize Section 811 Capital Advance as an eligible source of financial leverage when awarding points for financing commitments. Currently, Section 811 funding is not counted toward financial leverage, despite its role in providing long-term rental assistance for people with disabilities. Including Section 811 as a qualifying funding source would encourage more developers to incorporate deeply affordable and supportive housing units into their projects, expanding housing opportunities for individuals with disabilities while strengthening the overall financial viability of developments.
Plan	Point Scoring	4	For urban infill sites, excessive parking requirements impose unnecessary financial and spatial burdens on developments, increasing construction costs, reducing available land for housing, and contradicting modern urban planning principles. These requirements are particularly impractical in areas where

			alternative transportation options are expanding and car dependency is declining. Recognizing this shift, the City of Birmingham eliminated parking minimums in May 2024, demonstrating a commitment to fostering more sustainable, accessible, and affordable development patterns. Both the City and this project are actively investing in multimodal transportation infrastructure—including improved public transit, pedestrian pathways, and bike-friendly amenities—that support car-light living. This approach is especially beneficial in walkable, amenity-rich neighborhoods, where residents can conveniently access essential services, employment opportunities, and recreational spaces without relying on personal vehicles. Reducing or eliminating unnecessary parking requirements in such contexts ensures that housing remains more affordable, land use is optimized, and communities are better equipped to meet evolving transportation needs.
Plan	II	15	Currently, the construction standards within the QAP are structured in a way that strongly incentivizes the development of garden-style apartments and townhomes as the most feasible housing types. This approach limits the flexibility needed to support a diverse range of housing solutions, particularly in urban and high-demand areas where land constraints, density needs, and accessibility considerations require more compact, multi-story, or mixed-use developments. To better align with evolving housing needs, Alabama's QAP should include construction standards that encourage a wider variety of development types, including mid-rise and mixed-use buildings.
General Comment	Section		Remove requirement for telephone service letters as part of the application process. The use of land-line telephones is virtually non-existant and this letter continues to be increaslingly difficult to obtain.
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3/7/2025

Name: Courtney Riles Organization: One Roof Email: Courtneyr@oneroofonline.org Phone: 205-254-8833

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	I	3	We appreciate AHFA's commitment to prioritizing housing opportunities for disabled individuals, as this is a critical step toward ensuring greater equity in affordable housing. However, it is essential that housing policies and funding mechanisms fully reflect the needs of all disabled individuals, including those with higher support needs. Every person, regardless of the level of assistance they require, deserves access to stable, community-based housing that fosters independence and inclusion. Limiting affordable housing opportunities for individuals with higher support needs directly contradicts the principles outlined in the 1999 Olmstead ruling. This landmark decision affirmed the rights of disabled individuals to live in the most integrated setting possible and clarified the legal obligation of public entities to provide services in community-based settings rather than institutions. Restricting access to affordable housing for those with extensive support needs not only undermines this legal precedent but also perpetuates a system in which disabled people are unnecessarily institutionalized or forced into segregated environments due to a lack of available options. The urgency of this issue is underscored by the reality that disabled individuals face the highest rates of housing discrimination, are disproportionately priced out of the housing market, and are at an elevated risk of experiencing homelessness. Without intentional efforts to prioritize Housing Credit allocations for developments that include robust supportive services, the current pattern of exclusion, segregation, and institutionalization will persist.

			Given these challenges, we strongly urge AHFA to reassess its position that the LIHTC program is not intended to serve disabled individuals requiring more than minimal supportive services. If LIHTC funding does not support developments that accommodate a full spectrum of support needs, then disabled individuals—particularly those with higher needs—will continue to be excluded from community-based housing opportunities.
Housing Credit	II	12	AHFA should only award tax credits to projects constructing at least 10% of units according to the 2021 International Building Code ANSI Type A standards. The ANSI Type A accessibility standard provides a higher level of accessibility than basic compliance requirements, offering design features that support aging in place and enable people with disabilities to live independently. Type A standards include adaptable features that support residents with limited mobility and allow for future modifications if a resident's needs change. Requiring even a small portion of units to meet these standards ensures a base level of accessibility across new projects, meeting immediate needs and allowing for long-term adaptability.
Housing Credit	Point Scoring		AHFA should incentivize the development of mixed-income housing that includes units designated for individuals with disabilities. By incorporating affordable, workforce, and market-rate housing within the same developments, Alabama can create inclusive communities that provide economic diversity, improve housing stability, and enhance access to services and opportunities. Additionally, the policy might include threshold requirements stating that all developments must include a minimum percentage of units for Extremely Low-Income (ELI) households (e.g., 10% at 30% AMI or below) to qualify for Low-Income Housing Tax Credits (LIHTCs).
Housing Credit	Point Scoring		AFHA should actively promote the development of housing communities that incorporate comprehensive supportive services tailored to the needs of tenants with disabilities, individuals experiencing homelessness, and families with young children. Integrating robust supportive services within affordable housing developments is essential to ensuring housing stability, fostering long-term resident retention, and improving overall health outcomes. As of the latest available information, Alabama remains the sole state whose Housing Credit agency does not offer specific scoring incentives for supportive housing in its QAP. A key benefit of embedding supportive services within housing is the facilitation of access to federally and state-funded Home

			and Community-Based Services (HCBS). These services provide critical assistance, such as support with daily household tasks (e.g., meal preparation, cleaning, financial management) and community integration services (e.g., transportation to medical appointments, job placement and coaching). Without access to these essential supports, individuals may face unnecessary institutionalization in settings such as hospitals, group homes, or emergency shelters, limiting their autonomy and quality of life. Funding mechanisms, including Medicaid waiver programs such as In-Home Supportive Services (IHSS) and other community-based initiatives, explicitly uphold the right of people with disabilities to receive self-directed services in their own homes. These programs align with federal disability rights protections that emphasize community living as a fundamental principle. However, without dedicated service coordination and case management embedded within housing developments, many eligible residents may struggle to navigate and access these critical programs. Ensuring on-site or closely integrated supportive services empowers residents to maintain independent living and thrive in their communities. By prioritizing housing models that seamlessly integrate supportive services, AFHA can drive equitable housing solutions that enhance self-sufficiency, prevent unnecessary institutionalization, and promote the long-term well-being of vulnerable populations.
Housing Credit	Point Scoring	37	Tenant Needs: We strongly recommend increasing the set-aside requirement from a minimum of up to 7% to a minimum of 10% to begin addressing the severe housing shortage for people with disabilities. Alabama has waitlists for accessible units far exceeding availability. Increasing the set-aside to 10% ensures a more significant impact in addressing this gap. There is also significant overlap between homelessness and disability, with over 40% of people experiencing homelessness having a disability. By increasing the set-aside to 10%, the policy ensures housing solutions that better serve both priority groups. Lastly, a 10% set-aside demonstrates a proactive commitment to federal and state Fair Housing goals, aligning with Olmstead principles and efforts to increase community-based living options for people with disabilities.
Housing Credit	II		To incentivize the development of accessible, supportive housing for individuals with disabilities , AHFA should consider the creation of a dedicated Accessibility Supportive Housing

			(ASH) Pool for future QAPs, modeled after Virginia's QAP. This pool would prioritize projects that commit to a minimum of 15% of units for individuals with disabilities who use supportive services, ensuring compliance with HUD Section 504 accessibility standards and integrating project-based rental assistance to enhance affordability. Developments meeting these criteria would receive priority consideration in the LIHTC scoring process, increasing their competitive viability. To ensure long-term compliance, the program would implement a monitoring and tracking system to assess accessibility, affordability, and service integration. Expected outcomes include an increased supply of accessible, affordable housing, greater developer engagement in disability-inclusive housing initiatives, and improved state compliance with federal accessibility and fair housing mandates.
Plan	Point Scoring	37	One of the persistent challenges in accessible housing is ensuring that individuals with disabilities are aware of and able to secure available units that meet their needs. Without affirmative outreach and marketing strategies, accessible these units often fail to reach their intended residents. To ensure equitable access, Alabama's QAP should require developers to affirmatively market accessible units to disability communities and organizations led by and serving people with disabilities and older adults. This proactive leasing approach should apply both during the initial lease-up phase of new developments and whenever accessible units become available. Additionally, AHFA should require evidence of due diligence to lease units set aside for disabled/homeless individuals before they are made available to the general public and extend the time to 60 days. We learned in our community engagement process that many accessible units are not going to disabled individuals because either the marketing strategy is failing or housing providers and public entities need more time to go through their waitlist and find the tenants that need the unit the most. There should be explicit marketing guidelines, referral partners and rubrics to ensure that developers who are taking advantage of these points are doing everything within their power to house disabled individuals.
Plan	Point Scoring	37	Developers should not be able to claim points for setting aside units for special populations without demonstrating a clear, actionable plan for how their project will meet the specific

			needs of both disabled individuals and homeless individuals. Simply designating a certain number of units to these populations without detailing accessibility features, service coordination, or affordability levels risks creating developments that fail to provide meaningful support. A strong QAP should require developers to outline specific design elements, such as ADA-compliant units, universal design features, and integrated supportive services, to ensure that people with disabilities have housing that truly meets their needs. Similarly, developers should be required to demonstrate a commitment to a housing-first approach, incorporating case management, mental health and substance use services, and connections to employment and social supports. Requiring clear, enforceable commitments would prevent developers from using this category to score additional points while failing to deliver targeted solutions.
Plan	Point Scoring	16	The QAP does not sufficiently incentivize developments in well-connected, transit-rich areas. As a result, many affordable housing projects are built in low-resource neighborhoods where land is more affordable, but residents face increased isolation from essential services, employment opportunities, healthcare, and public transportation. To address this issue, the QAP should award additional points to projects located within half a mile of transit hubs, major employment centers, healthcare facilities, and grocery stores. This policy change would promote greater access to opportunity and improve the long-term outcomes for residents of affordable housing developments.
Plan	Point Scoring	12	Tenant needs should hold a higher weight in the QAP scoring system for several key reasons: 1. Aligning with the Core Mission of Affordable Housing The primary goal of the Housing Credit program is to serve low-income and vulnerable populations. Prioritizing tenant needs ensures that housing developments are designed to address the specific challenges faced by residents. A higher weight for tenant needs would reinforce this mission. 2. Ensuring Long-Term Viability and Stability Developments that prioritize tenant needs—such as integrated supportive services, accessibility features, and community engagement—tend to have lower turnover rates and better long-term sustainability. A scoring system that gives more points to tenant-centered initiatives would promote stable, successful housing. 3. Reducing Housing Insecurity and Homelessness

			Many low-income tenants, including those with disabilities, seniors, and families with children, face significant barriers to stable housing. A higher weight for tenant needs could incentivize developers to create units with deeper affordability, dedicated housing for people with disabilities, and on-site services that help tenants remain housed. 4. Encouraging Inclusive and Equitable Development Developers often prioritize financial feasibility, which can lead to projects that do not fully meet the needs of the most vulnerable populations. By increasing the weight of tenant needs, the QAP would push developers to incorporate more inclusive design elements, such as accessible units, universal design principles, and family-friendly layouts. 5. Enhancing Health and Quality of Life Affordable housing is not just about providing shelter—it should also support the well-being of tenants. Developments that incorporate health-focused initiatives, like access to healthcare, mental health services, and nutritional programs, contribute to improved outcomes for residents. Higher weighting of tenant needs would encourage developers to include such services. 6. Better Use of Public Resources Since the Housing Credit program is a public investment, ensuring that it effectively serves those with the greatest needs should be a top priority. A higher point allocation for tenant needs would direct resources toward projects that provide the most meaningful social and economic impact. By increasing the weight of tenant needs in the QAP, Alabama can better align its affordable housing strategy with broader goals of equity, inclusion, and long-term housing stability.
Plan	I	6	The QAP should recognize Section 811 Capital Advance as an eligible source of financial leverage when awarding points for financing commitments. Currently, Section 811 funding is not counted toward financial leverage, despite its role in providing long-term rental assistance for people with disabilities. Including Section 811 as a qualifying funding source would encourage more developers to incorporate deeply affordable and supportive housing units into their projects, expanding housing opportunities for individuals with disabilities while strengthening the overall financial viability of developments.
Plan	Point Scoring	4	For urban infill sites, excessive parking requirements impose unnecessary financial and spatial burdens on developments, increasing construction costs, reducing available land for housing, and contradicting modern urban planning principles. These requirements are particularly impractical in areas where alternative transportation options are expanding and car

			dependency is declining. Recognizing this shift, the City of Birmingham eliminated parking minimums in May 2024, demonstrating a commitment to fostering more sustainable, accessible, and affordable development patterns. Both the City and this project are actively investing in multimodal transportation infrastructure—including improved public transit, pedestrian pathways, and bike-friendly amenities—that support car-light living. This approach is especially beneficial in walkable, amenity-rich neighborhoods, where residents can conveniently access essential services, employment opportunities, and recreational spaces without relying on personal vehicles. Reducing or eliminating unnecessary parking requirements in such contexts ensures that housing remains more affordable, land use is optimized, and communities are better equipped to meet evolving transportation needs.
Plan	II	15	Currently, the construction standards within the QAP are structured in a way that strongly incentivizes the development of garden-style apartments and townhomes as the most feasible housing types. This approach limits the flexibility needed to support a diverse range of housing solutions, particularly in urban and high-demand areas where land constraints, density needs, and accessibility considerations require more compact, multi-story, or mixed-use developments. To better align with evolving housing needs, Alabama's QAP should include construction standards that encourage a wider variety of development types, including mid-rise and mixed-use buildings.
General Comment	Section		Remove requirements for telephone service letters as part of the application process. The use of land-line telephones is virtually non-existent and this letter continues to be increasingly difficult to obtain.
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3/7/2025

Name: Amaya Sizer on behalf of the Fahe AL Caucus Organization: Fahe Email: asizer@fahe.org Phone: 859-228-2136

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	Point Scoring	6	Would AHFA consider awarding points to projects for assumed funding or the extenstion of existing funding, as this financing enhances project feasibility and rent affordability, or awarding points to acquisition rehab projects that are funded prior to the application cycle?
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3/7/2025

Name: Anna Labadie Organization: Gulf Coast Housing Partnership Email: labadie@gchp.net Phone: (504) 525-2505 x209

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	Point Scoring	6 of 13	We request that AHFA consider adding the below funding sources in their list of approved non-AHFA New Funds for scoring criteria. These HUD programs provide additional capital to improve the feasibility of projects serving very low- and low- income individuals: - Section 811 / Supportive Housing for Persons with Disabilities: this program allows persons with disabilities to live as independently as possible in the community by subsidizing rental housing opportunities. - Section 202 / Supportive Housing for the Elderly: this program helps expand the supply of affordable housing with supportive services for the elderly.
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3/7/2025

Name: Jeff Rice Organization: Guilford Partners, Inc. Email: jrice@guilfordcompanies.com Phone: 334-281-6820

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	II	24	Existing stand-alone LIHTC properties that submit an application for a new allocation of credits struggle to be competitive. To further support the preservation of these much needed units, please consider advancing housing credits outside of the normal housing priority order and during the current application cycle. Subject to availability, the housing credits would be formally allocated within 24 months to ensure that any rehab costs that are incurred in the interim period may be included in eligible basis.
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3/7/2025

Name: Jeremy Bain Organization: Olympia Development, LLC Email: jeremy.bain@olympiaconstruction.net
Phone: 256-878-6054

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	Point Scoring	6	iii.a.1. We recommend that Capital Magnet Funds be recognized as an AHFA-approved source of new funding. These funds are competitively awarded by the U.S. Department of the Treasury to Community Development Financial Institutions (CDFIs) and nonprofit organizations with the goal of expanding affordable housing opportunities and fostering community development. By incorporating Capital Magnet Funds into the AHFA-approved funding framework, developers and organizations can access additional financial resources to support the creation, rehabilitation, and preservation of affordable housing. This inclusion would enhance the availability of capital for projects that serve low-income individuals and families, additional information can be found at: https://www.cdfifund.gov/programs-training/programs/cmf
Housing Credit	Point Scoring	9	vi.h. We recommend the use the USDA Eligibility Map to identify the exact location of the property and its corresponding Rural Designation. The map is found in the USDA page: https://eligibility.sc.egov.usda.gov ; and then selecting Multifamily Housing, project Eligibility. To facilitate AHFA's review of documentation and services, we suggest changing the distance calculation to a radius distance instead of driving distance. Driving directions could change due to repairs and road closure at the time of AHFA's inspection, adding unnecesary mileage at the time of the review. We suggest the use of Google Maps or any other Mapping tool to document and clearly identify multiple services within the radius distance
Housing Credit	Point Scoring	10	2.i. We appreciate AHFA’s efforts to promote diversity and inclusion by awarding additional points to developments that involve minority- or women-owned businesses (MWBEs).

			However, we would like to highlight a potential unintended consequence of the current policy language. As written, the policy allows for the inclusion of MWBEs that may have no meaningful connection to the developer or project and may be inexperienced or untrained in affordable housing development. At the same time, this policy may unintentionally disadvantage experienced entrepreneurs—particularly minority and women professionals—who have been actively engaged in the industry for years, gaining the expertise necessary to take on the role of an AHFA developer partner. To ensure that points are allocated in a way that both supports true participation and rewards meaningful experience, we propose the following revision to the point system: • 2 points should be awarded to minority- or women-owned businesses where the individuals have ownership and can demonstrate at least five years of business leadership. • An additional 3 points should be granted if this experience includes real estate development, grant writing, affordable housing, or property management. This adjustment would help balance the goal of fostering diversity while ensuring that participating MWBEs bring valuable expertise to affordable housing projects, ultimately strengthening the industry as a whole.
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HOME	Point Scoring	6	iii.a.1. We recommend that Capital Magnet Funds be recognized as an AHFA-approved source of new funding. These funds are competitively awarded by the U.S. Department of the Treasury to Community Development Financial Institutions (CDFIs) and nonprofit organizations with the goal of expanding affordable housing opportunities and fostering community development. By incorporating Capital Magnet Funds into the AHFA-approved funding framework, developers and organizations can access additional financial resources to support the creation, rehabilitation, and preservation of affordable housing. This inclusion would enhance the availability of capital for projects that serve low-income individuals and families, additional information can be found at: https://www.cdfifund.gov/programs-training/programs/cmf
HOME	Point Scoring	8	iii.a. We recommend the use the USDA Eligibility Map to identify the exact location of the property and its corresponding Rural Designation. The map is found in the USDA page: https://eligibility.sc.egov.usda.gov ; and then selecting Multifamily Housing, project Eligibility.

			To facilitate AHFA's review of documentation and services, we suggest changing the distance calculation to a radius distance instead of driving distance. Driving directions could change due to repairs and road closure at the time of AHFA's inspection, adding unnecesary mileage at the time of the review. We suggest the use of Google Maps or any other Mapping tool to document and clearly identify multiple services within the radius distance
HOME	Point Scoring	10	2.i. We appreciate AHFA's efforts to promote diversity and inclusion by awarding additional points to developments that involve minority- or women-owned businesses (MWBEs). However, we would like to highlight a potential unintended consequence of the current policy language. As written, the policy allows for the inclusion of MWBEs that may have no meaningful connection to the developer or project who may be inexperienced or untrained in affordable housing development. At the same time, this policy may unintentionally disadvantage experienced entrepreneurs—particularly minority and women professionals—who have been actively engaged in the industry for years, gaining the expertise necessary to take on the role of an AHFA developer partner. To ensure that points are allocated in a way that both supports true participation and rewards meaningful experience, we propose the following revision to the point system: • 2 points should be awarded to minority- or women-owned businesses where the individuals have ownership and can demonstrate at least five years of business leadership. • An additional 3 points should be granted if this experience includes real estate development, grant writing, affordable housing, or property management. This adjustment would help balance the goal of fostering diversity while ensuring that participating MWBEs bring valuable expertise to affordable housing projects, ultimately strengthening the industry as a whole.
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General Comment	Section	n/a	We respectfully request that AHFA consider separating the Application Workshop from the release of the Qualified Allocation Plan (QAP), including the beginning of the public commenting period. This separation would allow stakeholders adequate time to thoroughly review and analyze the proposed changes before engaging in discussions and providing meaningful feedback. Managing overlapping QAPs from different years creates unnecessary confusion, and in many cases, developers do not have sufficient time to fully assess

			the impact and potential unintended consequences of new policy language before they must respond. Additionally, we recommend restructuring the Application Workshop to better support engagement and comprehension. Instead of a single lengthy and routine presentation, we suggest offering an interactive online workshop divided into sections, allowing participants to focus on specific areas of interest and absorb the information more effectively. A more dynamic and engaging format would not only enhance understanding but also foster more productive discussions within the development industry. We appreciate your consideration of these recommendations and believe that these adjustments would improve clarity, participation, and the overall effectiveness of the QAP process.
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3/7/2025

Name: Julie Shiyou-Woodard Organization: Smart Home America Email: julie@smarthomeamerica.org Phone: 855.742.7233 x700

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	II	15	AHFA should add resilent construction practices to the Application Threshold Requirements. All AHFA projects should obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety.
Housing Credit	Point Scoring	3	AHFA should offer a maximum of 4 points to all projects that obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety. Award 1 point to projects that obtain a FORTIFIED Roof designation. Award 2 points to projects that obtain a FORTIFIED Silver designation. Award 3 points to projects that obtain a FORTIFIED Gold designation. Award 1 additional point to projects that obtain any FORTIFIED designation with Hail Suppplment.
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3/7/2025

Name: Amaya Sizer on behalf of the Fahe AL Caucus Organization: Fahe Email: asizer@fahe.org Phone: 859-228-2136

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	Point Scoring	6	The Fahe Alabama Caucus suggests that AHFA consider awarding points to projects for assumed funding or the extenstion of existing funding, or to acquisition rehab projects that are funded prior to the application cycle, as this financing enhances project feasibility and rent affordability, and it is also necessary for preservation/acquisition.
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3/7/2025

Name: David Morrow Organization: Morrow Realty Email: davidm@morrowrealty.com Phone: 205-759-5781

Plan Section	**Section Reference**	**Page #**	**Specific Comments**
Housing Credit	Point Scoring	A-10	Applicant Characteristics (i) states that 10 points will be given to applicants with participation of minorities or women. This applies in part to ownership composition and in part to contracting set asides. Minorities are defined as certain racial or ethnic categories. The Morrow Companies strongly support an inclusive affordable housing industry and encourage AHFA to look for appropriate means to support and encourage participation in its programs by women and minorities within constitutional limits. This provision excludes from consideration women and minorities with an identity of interest with other project participants, also discourages (and in some circumstances entirely prohibits) the involvement of family members, e.g., daughters, complicating succession planning in these highly illiquid real estate projects. Further, such limitation is unclear because it does not define with whom the prohibited identity of interest exists. Presumably, it is with others in ownership, consistent with the context of Section II(G)(4), and not every party to the project, which would, for instance, preclude an MBE responsible owner from participating in the transaction through the MBE's affiliated general contractor corporation. The proposed provisions should also be reconsidered in light of current federal law. The provision for additional points based expressly upon race and sex categories appears to violate the Equal Protection Clause of the United States Constitution, as construed by the U.S. Supreme Court in Students for Fair Admissions, Inc. v. President and Fellows of Harvard College, 601 U.S. 181 (2023) (Fourteenth Amendment applies "without regard to any difference of race, of color, or of nationality". P. 206.) Similar to the affirmative action programs held unconstitutional, the AHFA provisions "lack

			sufficiently focused and measurable objectives warranting the use of race, unavoidably employ race in a negative manner, involve racial stereotyping, and lack meaningful end points." P. 230. Executive Orders of the President also provide that preferences based on race or sex violate Federal civil rights laws. EO 14173, "Ending Illegal Discrimination and Restoring Merit-Based Opportunity", January 21, 2025. In part, the EO states: "Yet today, roughly 60 years after the passage of the Civil Rights Act of 1964, critical and influential institutions of American society . . . have adopted and actively use dangerous, demeaning, and immoral race- and sex-based preferences under the guise of so-called 'diversity, equity, and inclusion' (DEI) or 'diversity, equity, inclusion, and accessibility' (DEIA) that can violate the civil-rights laws of this Nation. Illegal DEI and DEIA policies not only violate the text and spirit of our longstanding Federal civil-rights laws, they also undermine our national unity, as they deny, discredit, and undermine the traditional American values of hard work, excellence, and individual achievement in favor of an unlawful, corrosive, and pernicious identity-based spoils system." The EO directs the head of each federal agency, including the Departments of Housing and Urban Development and Treasury, to include in every contract or grant award a term requiring the contractor or grant recipient to certify that they do not operate any programs promoting DEI that violate any applicable anti-discrimination laws and acknowledge that the certification is material for purposes of the government's payment decision and therefore subject to the False Claims Act. See 31 U.S.C. 3729(b)(4). Further, non-compliance puts at risk grants, such as those which fund the HOME Partnership Program. See also EO 14151, January 20, 2025, and EO 14148, January 20, 2025.
Housing Credit	Point Scoring	A-6	iii.a.1. Add additional avenues of funding to the list, including, but not limited to: community development financial institution (CDFI), Capital Magnet Funds (CMF), and any financing source with interest at or below the long-term monthly AFR rate.
Housing Credit	I	8-9	Non-refundable fees, missing or incomplete docs is currently $2,000. A reasonable fee would be $1,000 per occurance.
Housing Credit	II	20	E. 1. iii. Allow a Basis Boost in all Rural Areas for new construction to make them more financially feasible. We also request that AHFA allow a Basis Boost to census tract areas that are adjacent to or within a mile radius of a QCT or DDA to allow for better diversity of geographic areas for housing throughout the state.

Housing Credit	II	31	J. 3. Occasionally the initial syndicator's pricing changes and another syndicator is more competitive by the time the project closes. We suggest that changing syndicators should not be a negative action and when notifying AHFA of a change of syndicator there should not be a change fee assessed.
Housing Credit	ENV Policy		We request that AHFA adopt the requirements per the HUD Noise Standards and that only these standards be implemented moving forward. a. AHFA adopt the following HUD Environmental Standards: i. Permit the use of engineering and institutional controls to mitigate environmental conditions as addressed under HUD Multifamily Accelerated Processing (MAP) Guide; Section 9.4.5 (D)(1): Engineering and Institutional Controls (EC/IC): An Engineering Control is a physical measure that reduces or eliminates exposure to contamination. An Institutional Control is a non-engineered instrument, such as administrative and legal control. ICs typically limit land and/or resource use or provide information that helps modify or guide human behavior at a site. An appropriate mix of ECs such as capping and slurry walls, and ICs such as protective covenants, access restrictions and tenant and employee notification, are usually required for all RBCAs or other accepted cleanup program as approved by the LSTF authority. ii. Do not impose exterior noise standards at the property line. Per 24CFRPart 51, Subpart B; 51.103(c)(1): Exterior standards. (1) The degree of acceptability of the noise environment at a site is determined by the sound levels external to buildings or other facilities containing noise sensitive uses. The standards shall usually apply at a location 2 meters (6.5 feet) from the building housing noise sensitive activities in the direction of the predominant noise source. Where the building location is undetermined, the standards shall apply 2 meters (6.5 feet) from the building setback line nearest to the predominant noise source. The standards shall also apply at other locations where it is determined that quiet outdoor space is required in an area ancillary to the principal use on the site. b. Remove meeting Environmental Policy Requirements as a Threshold item: The conclusions of such assessments are based on the professional opinion of Environmental Professionals (EPs) who sign the reports. The EPs firms are licensed and insured. AHFA is provided with a reliance letter for the reports, including specific insurance requirements. If AHFA or their retained attorneys or environmental consultant(s) have a

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			difference of opinion, all parties should be permitted to resolve the differences of opinion within an adequately allotted appeal timeframe. If AHFA is not open to removing environmental as a Threshold item, consider leaving it as Threshold relative to the identification of recognized environmental conditions (RECs), but allow for differences of opinion relative to scopes of Phase II Environmental Assessments to be addressed between the parties, or resolved by getting a third environmental professional to opine.
General Comment	Section		Please remove the requirement for telephone service letters as part of the application process. The use of land line telephones is virtually non-existent. Several telephone service providers simply refuse to provide such letters making them increasingly difficult to obtain.
Housing Credit	I		Please consider removing the charge for changes to the schematic site plan. The plan submitted at application is preliminary and done without topo survey or local governmental input. These an other factors make it nearly impossible for the site plan not to be modified after the initial application.
General Comment	Section		We recommend that AHFA insert language, such as an addendum for a supplemental funding round, additional credits, and/or other resource, in the 2026 QAP. This would give AHFA the flexibility to address funding and cost overrun issues that arise on previously funded projects. Proposed tariffs on foreign goods and mass deportations will likely cause an increase in construction materials and labor, and the possibility of lower corporate tax rates has the potential to impact equity pricing, which could negatively impact the feasibility of previously funded projects.
Housing Credit	Point Scoring		Add points for location of the project site in a DDA because they are hard to develop.
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