AHFA 2021 Draft HOME Action Plan, Low-Income Housing Credit Qualified Allocation Plan, and National Housing Trust Fund Allocation Plan Public Comment Form Commenting Period July 2, 2020 – August 20, 2020

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

8/20/2020

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Point Scoring	A-7	Expiring HOME projects should be awarded points even if they are unable to paydown the required 30%, so long as the development can demonstrate it's inablity to pay the full 30%. The point scoring for this category should be tiered so that you obtain points for 10%, 20%, and 30% paydowns. This is particularly important in very rural areas where HOME funds were used as a means to get the rents low enough for the population to be able to afford them. Most of these areas have not seen significant economic growth and in a lot cases have actually seen a decrease in economic growth, population growth, etc. This would allow HOME projects that are not as cash flush to still be able to compete.
Housing Credit	Point Scoring	A-7	The points for project services should be expanded and/or different criteria should be used for expriing HOME projects. The services that are given points now, were not the same as when these developments were initially constructed. In order for these projects to have an even playing field, they should be allowed to obtain points for other services that may be available. In rural parts of the state in particular, a full service grocery store, hospital or doctor's office may not be available and sometimes are even located in the next closest bigger town. Allowing expiring HOME projects to gain service points for stores like Dollar General, Family Dollar or other like services would help these projects to receive a higher score and be more likely to receive funding.
Plan	Section	A-6	A maximum of 3 points are currently available to projects that have a commitment for new funds coming from a Capital Fund Program, Public Housing Sales Proceeds, and/or HUD Replacement Housing Factor Funds. For PHAs that have already converted to RAD, any balance available in those funds would be drawn down and deposited in a Replacement

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			Reserve account (to comply with the RAD PBV requirements). If a PHA is able to utilize those reserve funds to renovate existing housing or development new housing, AHFA should incentivize them to do so with an equal award of points. At a minimum, AHFA should allow PHAs to provide evidence that the reserves were obtained from 1 of the 3 named sources and award points accordingly.
Housing Credit	ENV Policy	General	AHFA should consider relaxing its environmental requirements for expiring HOME developments. Over the 20+ years that these developments have been in place, nature has changed the landscape causing areas that were not once wetlands to now be considered wetlands, and or soil issues that were not considered a problem when the project was initally developed are now prohibiting the property to be able to move forward; making the only option for these developments a five-year extension. Which, is clearly not a long-term resolution for keeping the affordable housing safe, sanitary, and affordable. A great number of these developments do not produce enough cash flow to borrow money to make necessary repairs/renovations and they don't have the reserves either.
Plan	ENV Policy	B-9	AHFA should consider relaxing its environemental requirents related to noise, espeically for projects with expiring HOME loans. If the AHFA could consider making their requirements similar or the same as the HUD requirements, this would allow more expiring HOME developments to move forward. The environmental requirements were not the same 20+ years ago when these projects were developed. Additionally, over time, things change around the project sites that are out of the owner's control. Since the owner cannot pick up these developments and relocate them to a better environmental location, it is making it very difficult and/or impossible for some expiring HOME projects to be able to apply for a 15-year extension and make needed renovations with new tax credit equity.
Plan	Section		
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