

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.gap@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

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-5	(a)(1) New Funds Please add Capital Magnet Funds and other funds with a maximum interest rate at or below long term monthly AFR to the list of AHFA-approved sources of new funds to help fund properties in more rural counties with lower rents.
General Comment	Section		Allow income averaging so that rural deals including HOME will be more financially feasible. This could involve allocating the HOME funds to just certain units rather than 100% of the units. This would also allow tax credit only projects to target lower incomes for PHA developments and also would assist in the acquisition/rehab of affordable properties that may have just a few over income residents that would otherwise make the acquired properties not financially feasible.
Housing Credit	Point Scoring	A-6	(c) Rental/Operating Subsidies We request that rental assistance on a HUD project (separate from a PHA) transferred to a new or replacement project for at least 25% of the total proposed units count for 2 points.
Housing Credit	Point Scoring	A-2	Tiebreaker 3 Giving priority to a project to go to the county with the fewest number of Active AHFA Projects does not accurately show equitable distribution of funds among the counties. Rather, the tiebreaker priority should be to the lowest percentage of AHFA units funded per capita in each county.
General Comment	Section		Please add a HOME rehab set aside
Housing Credit	ENV Policy	B-7	Allow wetlands to be part of a development if not disturbed or if delineated per HUD and/or Army Corps of Engineers requirements so that more projects in areas that need it the most don't get overlooked.
Housing Credit	ENV Policy	B-8	d. Noise Abatement & Control AHFA interprets exterior noise requirements to be at the property line. This is not consistent with HUD. We request that AHFA adopt HUD Guidelines for exterior noise

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