

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.

8/19/2020

Name: Rick Cavalieri Organization: Invictus Development, LLC Email: rcavalieri@invictusdev.com Phone: (813) 267-8457

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Section	26	Three tenant services list is not readily apparent on the AHFA website
HOME	Point Scoring	28	Site control Paragraph 4 Line 4 - "Conditional contract" definition- What is the definition of a conditonal contract. What conditions are not allowed?
HOME	Point Scoring	32	Section C, Paragraph 15 - Three tenant services list is not readily apparent on the AHFA website
HOME	IV	44	Section I, Paragraph 1 - Currently progress reports are due by the last day of the reporting quarter. If these reports were due fifteen days after the end of the quarter, all the monthly construction draws would be completed and submitted thereby presenting a more accurate picture of progress at quarter end.
Housing Credit	ENV Policy	B-1	Current environmental policies are onerous, now costing close to \$10,000 per site to complete along with any AHFA fees for missing or incomplete items that frequently happen even with experienced developers and environmental professionsals.
HOME	ENV Policy	B-1	Current environmental policies are onerous, now costing close to \$10,000 per site to complete along with any AHFA fees for missing or incomplete items that frequently happen even with experienced developers and environmental professionals. The report requirements are more stringent than the HOME/NEPA program regulations as currently published by HUD. Given the recent relaxation of NEPA rules by the Federal Government, is AHFA going to revisit their environmental requirements for HOME developments?
Housing Credit	II	20	Site control definition relates to HOME definition that has the term "Conditional contract" definition- What is the definition of a conditonal contract. What conditions are not allowed?
HOME	ENV Policy	B1	Since the environmental requirements are so difficult, allow two errors at a reduced or no fee amount.

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