

AHFA 2022 Draft Low-Income Housing Credit Qualified Allocation Plan, HOME Action Plan,
and National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period July 28, 2021 – August 27, 2021

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.

8/19/2021

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| Plan Section | Section Reference | Page # | Specific Comments |
|----------------|-------------------|--------|--|
| Housing Credit | Section | | <p>GENERAL COMMENT AS TOPIC IS NOT ADDRESSED IN QAP DOCUMENT:</p> <p>BGC Advantage specializes in 4% Bond transactions and Public Housing Authority projects. We are concerned that the 2022 QAP does not include language regarding projects with scattered sites. Our client, Fairfield Housing Authority, is pursuing rehabilitation of its properties, which include scattered sites.</p> <p>Many year ago, as HUD was developing public housing, many communities in Alabama made the decision to not concentrate public housing in a single area; rather to deconcentrate and scatter housing on smaller sites across cities and counties.</p> <p>Fairfield Housing Authority, located in Fairfield, Alabama, has legacy projects that are in despeate need of rehabilitation; however, funding those rehabilitation units by bundling the projects together is the only way we can financially rehabilitate and then manage those sites.</p> <p>These developments, like so many other Rural Development projects, are fewer than 24 units per site. When combined, however, these total more than 200 units which would be managed and operated as a single development project and financed under one ownership structure.</p> <p>Our recommendation is that the Alabama Housing Finance both allow and encourage scattered site developments that will leverage the tax exempt bonds and 4% tax credits.</p> |

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