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.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.

7/29/2021

Name: Jenn Wilkinson Organization: REA Ventures Email: jenn@reaventures.com Phone: 843-494-2162

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Point Scoring	A-5, A-6, A-8	I have been reviewing some of the previous years QAP's and comments submitted to AHFA. I see where some of the issues I mentioned in the Public Hearing have been presented in the past and AHFA made amendments to accommodate. These 2-scenarios are important factors crippling many small cities that are having growth, but lack of decent affordable housing to enhance the growth.
			Below is a change made previously. Maybe this change is submitted in rotating years to allow the lower census tracts a LIHTC award. I am not sure what to do for areas that have no census tracts. Maybe my second point below could help those areas.
			Census Tracts · One (1) point was added for projects located in census tracts where the Median Family Income from the 2010 census data (2010 ACS 5 Year) is 60% - 79% of the county's 2014 current Annual Median Family Income published by HUD. This change was made to increase the number of census tracts eligible for points.
			My second comment regarding points for outside funding. I agree it is beneficial to have additional sources so credits can be spread across more projects. These additional sources are becoming more difficult to access.
			Below is a change made previously.
			2016 QAP - The value of donated land and/or furnishings, funds for purchase of land, construction financing, permanent financing and operating subsidies will be added as leveraging

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		sources eligible for points. (Maybe add- cost of infrastructure or somehting similar.)
Plan	Section	
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