

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](mailto: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](http://www.ahfa.com) for review.

8/18/2021

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	I	7	It is required that applicants demonstrate adequate infrastructure capacity for utilities. Telephone service has historically been included as a required utility in the application. AHFA should consider removing the requirement of telephone service. We have performed rehabilitation projects with hundreds of residents needing to be relocated with not a single resident having phone service that needed to be transferred. Especially in some more rural markets, phone service providers are starting to become difficult to work with at times to get our letters, and it is a service that is simply not required to provide quality housing in modern times. Or, perhaps AHFA should consider swapping the required service from telephone to internet.
Housing Credit	Point Scoring	A-6	Match Contributions: I am opposed to the proposal for points to be given in exchange for a Responsible Owner providing equity in to the project. It doesn't seem this benefits the program or creates effective competition, as even "rich private developers" would harm their own developments with an equity contribution. More equity leads to less tax credits for the investors to purchase and affects incoming developer fee for the Responsible Owner.
Housing Credit	Point Scoring	A-7	Match Contributions: I am not necessarily opposed to points for the donation of land. AHFA must clarify several details, such as how to document the resources that acquired the land. Will land value be determined including any existing structures? If so, this seems to be a category that will effectively only be available to rehabilitation applications since \$100,000 is a high land value especially in rural areas in Alabama.

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Housing Credit	Point Scoring	A-6	Rent Affordability / New Funds could include grants or loans from resources created by the American Rescue Plan. Cities and counties received funding as well as many broadband providers. AHFA could consider giving points to developments who commit to creating a campus with high-speed internet services available to residents.
Housing Credit	Point Scoring	A-7	Project Type: Currently 2 points are awarded for the rehabilitation or replacement of existing or previously existing multifamily housing. AHFA should amend this section to allow for public housing authorities to create replacement housing without the requirement of demolition. The US Dept of HUD has expanded the housing preservation options for public housing authorities to include Section 18 and Section 22, which allow for the disposition of public housing units without necessarily demolishing those units. A qualifying housing authority may use these programs to ultimately have unsubsidized units that continue to run as "market-rate" and therefore no longer "affordable housing." The rental assistance can be transferred to newly constructed units on a new site. In this scenario replacement multifamily housing is created and achieved without any demolition.
Housing Credit	ENV Policy	B-9	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 requirements. This would mean that only outdoor areas designated for recreation (such as patios, picnic areas, balconies, etc.) would be subject to the 65 dB threshold for acceptability. For Housing Credit applications, the QAP indicates "...mitigating measures should be incorporated into the project to the fullest extent practicable." Please provide examples of when AHFA will not require mitigation measures if interior or exterior noise is above 45/65dB, and what makes a mitigation measure "practicable."
Housing Credit	I	7	Internet availability should be added as a required utility, or should replace telephone service.
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