

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

Name: Lynn Smith Organization: Jefferson County Commission Email: smithl@jccal.org Phone: 205.521.7565

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Point Scoring	A-6	The additional 5 points in the Matching Contributions category for 5% owner equity is not helpful to the project. As a HOME PJ we have to certify as to the financial capacity of the developer which is frequently also the owner of the project. If we as a PJ wish to participate in the project it will be difficult to document to HUD that they are financially strong as required while they are simultaneously weakened by carving that much cash out of the project. Private lenders may find this objectionable as well. This point category should be removed.
HOME	Point Scoring	A-6	I am not familiar with what the match requirements might be if any for Housing Credits. If, however, the purpose of the additional 5 points for a commitment of 5% owner equity in the project is for AHFA to accumulate HOME Program match it will not work. The HOME regulation at 92.220(b)(3) specifically eliminates owner equity or investment in a project as an eligible form of match. Since donated property also earns 5 points and is an eligible form of HOME match it appears that the accumulation of match may be the goal and why the category is listed as "Match Contributions" for scoring. If this is so, the 5% owner equity contribution will serve no purpose for AHFA and weakens the project as described in the previous comment above and should be removed.
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