

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.

Select Date Submitted

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	I	7	As written, the Plan states that an application may be terminated based upon market criteria to include "all active AHFA projects in the defined market "must" have an overall average stabilized vacancy rate of 15% or above." If the intent is to terminate an application in markets where the average vacancy rate exceeds 15%, please consider removing "must" for further clarity
Housing Credit	Point Scoring	A-3	Please provide confirmation that alarms are only required on 1st floor windows & exterior doors accessed by public (i.e., is an alarm required on second story balcony door if it is only accessible from the inside of the unit?). Also please confirm that wifi based security systems are acceptable for points
Housing Credit	Point Scoring	A-5	Please consider allocating 5 points under Energy/Water Conservation to new construction projects certifying to ENERGY STAR's Residential New Construction Program and to rehabilitation projects that incorporate cost-effective energy upgrades based upon an energy analysis and energy audit
Housing Credit	Point Scoring	A-5	Please allow projects that benefit from the assumption of existing funds from AHFA's approved list. The assumed favorable financing still reduces the project's overall debt service obligation which translates to rent affordability
Housing Credit	Point Scoring	A-6	A contribution of 5% of TDC may have unintended tax and equity implications & disincentivize developers who are already feeling stretched due to rising construction pricing. Rather than including this as a point category, please consider allocating these points to a new category that would benefit the ultimate users such as additional energy efficiency measures that reduce tenant utility costs. Alternatively, please consider revising this point category to allow the contribution to be repaid to the responsible party from available cash flow