

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.

7/28/2021

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Plan Section	Section Reference	Page #	Specific Comments
Plan	IV	18	<p>Environmental studies should not be a Threshold item. The conclusions of such assessments are based on the professional opinion of environmental professionals who sign the reports. AHFA is provided reliance for the reports in accordance with AHFA requirements. If AHFA or their retained attorneys or environmental consultant(s) have a difference of opinion, all parties should be permitted to resolve the differences of opinion within an adequately allotted timeframe. The current penalty structure is such that there is incentive for AHFA and their representative(s) to have a difference of opinion, or request for additional information, even if it is not material to the conclusions of such environmental reports. If AHFA is not open to removing environmental as a Threshold item, consider leaving it as Threshold relative to the identification of recognized environmental conditions (RECs), but allow for differences of opinion relative to scopes of Phase II Environmental Assessments to be addressed between the parties.</p>
Plan	ENV Policy	B9	<p>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.</p> <p>For Housing Credit applications, the QAP indicates "...mitigating measures should be incorporated into the project to the fullest extent practicable." Please add clarifying language to explain the meaning of "should" and "fullest extent practicable." It is critical to</p>

