

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.

8/26/2021

Name: Stephanie Lanier Weems, Esq. Organization: Fairfield Housing Authority Email:
sweems@msnattorneys.com Phone: 205-838-9007

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Section		<p>GENERAL COMMENT AS TOPIC IS NOT ADDRESSED IN QAP DOCUMENT:</p> <p>I am the legal counsel for the Fairfield Housing Authority. The Authority is preparing to submit a 4% Tax Credit application; however, the QAP does not include language regarding projects with scattered sites.</p> <p>Many year ago, as HUD was developing public housing, many communities in Alabama made the decision to NOT concentrate public housing in a single area, but rather to deconcentrate and scatter housing on smaller sites across the Cities and Counties.</p> <p>Fairfield Housing Authority, located in Fairfield, Alabama, has legacy projects that are in desperate need of rehabilitation; however, funding those rehabs by bundling the projects together is the only way the Authority can financially rehabilitate and then manage those sites.</p> <p>These developments, as well as many other Rural Development projects, are fewer than 24 units per site. When combined, however, these totalover 200 units. These would be managed and operated as one project and financed under one ownership structure.</p> <p>It has been recommended by the Authority's consultant that the Authority ask that the Alabama Housing Finance both allow and encourage scattered site developments that will leverage the tax exempt bonds and 4% tax credits.</p>
Plan	Section		