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Housing Credit QAP				
B. Establishment of Housing Priorities	3	Dr. Josh Carpenter/City of Birmingham	The following amendments are recommended to Section B's "Establishment of Housing Priorities": Projects that are located in designated Opportunity Zones as the term is defined in 26 U.S.C. § 45D(e)"; and, Projects that are located in designated Opportunity Zones as the term is defined in 26 U.S.C. § 45D(e) where the census tract in question is at heightened risk of displacement"	No changes will be made.
B. Establishment of Housing Priorities	5	Michael Hellier / Gulf Coast Housing Partnership	The QAP requires that multifamily rental housing projects be on a single site, or contiguous. Sites separated by one neighborhood street may be considered contiguous. This requirement eliminates true scattered site projects that could have a broad positive impact in certain blighted neighborhoods within Alabama.	
C. Application Criteria, **2)**	5	Mary Ellen Judah / Neighborhood Concepts, Inc.	Section I.C.2 indicates that a prior funded HOME project MUST have CLOSED a 15 year extension of the original HOME loan to be eligible to submit a current year application. Section A.1.v.a on Page A-7 of Addendum A states that 6 points may be awarded to projects with fully executed COMMITMENT for a 15 year extension. Please clarify.	Section A.1.(v)(a) will be corrected to reflect language that a prior funded HOME project must have closed a 15-year extension of the original AHFA HOME loan to receive points.
C. Application Criteria, **2)**	6	Michael Hellier / Gulf Coast Housing Partnership	Please clarify the following "All residential rental units must be under common ownership, deed (or long-term lease), financing and property management." Would AHFA allow a single LIHTC transaction, under common ownership, financing, and property management, but with two or more separate lots of record? It not, please consider whether this contradicts a requirement on page 5: "Sites may be considered contiguous if separated only by one neighborhood street."	The QAP currently provides that a single Housing Credit application with common ownership, financing, and property management with two or more contiguous lots, as defined in the QAP, is allowed.

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C. Application Criteria, **5)**	7	Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	It is required that applicants demonstrate adequate infrastructure capacity for utilities. Telephone service is included as a required utility in the application. AHFA should consider removing the requirement of telephone service. Our firm has 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.	No changes will be made. Telephone service should be an available option for the residents.
D. Fees, **2) Missing and/or Incomplete Items…**	8	David Morrow / The Morrow Companies	(2) Missing and/or Incomplete Items The fees under this section are excessive, given the application costs, and should also be limited to per document, not per occurance as the same document may be included in the application multiple times. Please consider lowering the amount in the Required Fee.	No changes will be made. The required fee for missing items is per document. Any application that has a total of 8 or more missing item occurrences will not be considered a viable application and accordingly terminated.
C. Application Threshold Requirements, **4) Site Control**	12	Michael Hellier / Gulf Coast Housing Partnership	Please include all necessary Housing Authority approvals related to Public Housing Capital funding (Replacement Housing Factor Funds and Capital Fund Program) as an exception listed in 4(ii), alongside construction-related approvals from local government.	No changes will be made. .
C. Application Threshold Requirements, **13) Site Location**	14	Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	The 2-Mile Radius Requirment exception item (iv) should be modified so that it does not only apply to Multifamily Housing Revenue Bond projects. If the intent is to avoid saturating a market with new units, a rehabilitation or redevelopment of an	No changes will be made.

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			already existing project should not affect a market any more or less than a project using the Bond program.	
C. Application Threshold Requirements **14) Extended Use Period**	15	Meagan Shannon Vlkovic/Enterprise Community Partners	Preserving Existing Units by Waiving Qualified Contracts Enterprise recommends that AHFA establish a waiver to Qualified Contracts within the QAP to ensure that the state retains its Housing Credit investments for at least the full 30-year affordability period as Congress intended. While we applaud the state for recently strengthening the extended use period stipulated in the QAP, Qualified Contracts still offer a loophole through which Housing Credit properties can convert to market-rate – especially due to a flaw in the federal statutory pricing that makes it very difficult for HFAs to find qualified buyers who can afford to purchase properties during the Qualified Contract process. A federal, bipartisan bill, The Save Affordable Housing Act, has been introduced to correct Qualified Contracts and the premature loss of Housing Credits properties. However, we strongly recommend that states protect their Housing Credit properties through a full Qualified Contract waiver until that federal correction is enacted. Currently the Extended Use Period threshold requirement on page 15 mandates that projects are not allowed to apply for a Qualified Contract until after year 19 of the Extended Use Period. Enterprise strongly recommends that AHFA replace the current conditions under which a Qualified Contract can be pursued with a separate Qualified Contract stipulation that clarifies that in submitting an application, applicants automatically waive their right to submit a Qualified Contract. Including this new, explicit language would ensure that Housing Credit properties remain affordable at least through the extended use period as intended by Congress. This can be included as an additional threshold requirement after the Extended Use Period threshold on page 15. For questions on Qualified Contract recommendations, please	This section will be revised as follows: <u>Extended Use Period.</u> All Projects must commit in writing to extend the Extended Use Period an additional 5 years for a total Extended Use Period of 35 years. Accordingly, Projects will not be allowed to apply for a Qualified Contract until after the 19th year of the Extended Use Period, which is 4 years after the 15-year compliance Period.

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			feel free to contact Sarah Brundage at sbrundage@enterprisecommunity.org or 202-403-8001.	
C. Application Threshold Requirements **14) Extended Use Period**	15	David Morrow / The Morrow Companies	14). Under paragraph 14), please leave the qualified contract period at 19 years rather than the 35 years as proposed in the 2020 QAP. 35 years is a long time to restrict rents and may prohibit developments from being preserved using more current restrictions that may come into the law after 15 years such as income averaging. This will make the projects more financially feasible for preservation and able to maintain it appropriately for longer periods of time rather than being inflexible.	
C. Application Threshold Requirements **14) Extended Use Period**	15	Jordan Whiteside / Vantage Development ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Jason Freeman / Gateway Development Corporation ************** Dave Truitt / CAPNA	Leave the qualified contract period at 19 years rather than the 35 years as proposed in the 2020 QAP. 35 years is a long time to restrict rents and may prohibit developments from being preserved using more current restrictions that may come into the law after 15 years such as income averaging. This will make the projects more financially feasible for preservation and able to maintain it appropriately for longer periods of time rather than being inflexible.	
E. Application Evaluation, (iii) Determination of Financial Feasibility **E. (iii) c)**	17	Michael Hellier / Gulf Coast Housing Partnership	Please clarify what AHFA's hard and soft cost standards are, as referenced in E.(iii).c).	No changes will be made.

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E. Application Evaluation, (iii) Determination of Financial Feasibility	17	Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Boost LIHTC Basis with new rules to generate additional credits/equity; An example of "enhanced" developer fee concept for 4% transactions (similar to Ohio and Tennessee); For example, Tennessee allows a 25% Developer Fee on Total Development Cost (minus reserves and developer fee) to be included in eligible basis. They require that a developer must defer the delta between the enhanced fee and the traditional TN standard fee (15%). In Alabama's case, allowing the extra fee and requiring its deferral creates additional basis and additional equity. This creates an internal stream of gap financing without AHFA having to use HOME funds, HTC, etc - which are obviously limited. In a bond deal, an increased fee may also entice the developer to participate in a greater way by adding added equity or cash in the form of a loan back to the developer.	No changes will be made.
E. Application Evaluation, (iii) Determination of Financial Feasibility	18	Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Lower Operating Reserve Threshold - Requiring lower reserves, particularly for PBRA properties and/or properties that don't have secondary funds from AHFA that must be paid back (amortizing HOME loan, etc), would free up meaningful rehab capital. For example, requiring 6 months of debt service instead of 6 months operating and 3 months debt service reserves, would spur immediate additional physical improvement, while maintaining adequate financial security for the asset.	This section will be revised as follows: AHFA will require the Project to establish and maintain throughout the Extended Use Period a minimum operating reserve. The operating reserve will be an amount equal to four months of the projected first year operating expenses (including replacement reserve payments) plus two months of debt service.

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G. Housing Credit Allocations **1) Four-Percent Credit**	21	Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Currently AHFA is a conduit lender and can only issue bonds and not tax exempt loans. By changing the statute, at least the TEL product is available.	No changes will be made.
G. Housing Credit Allocations **2) Nine-Percent Credit**	21	David Morrow / The Morrow Companies	G.2) Nine-Percent Credit AHFA should provide a 30% basis boost to all rural rehabiliation projects because the rents are smaller and harder to underwrite. Please add "(iii) A proposed Project application that includes a letter from USDA stating that the applicant appears to meet the eligibility requirements for the transfer/assumption of an existing USDA Rural Development 515 loan will receive up to a 30% increase in Eligilbe Basis." after subparagraph (G)(2)(ii). AHFA should allow completed projects a basis boost to allow projects to use all their eligible basis from their original allocation if needed to make the project financially feasible.	No changes will be made.
G. Housing Credit Allocations **2) Nine-Percent Credit**	21	David Morrow / The Morrow Companies	G.2) Nine-Percent Credit AHFA should allow HOME applicants to request up to a 15% basis boost at application in order to make them more financially feasible and amortize more HOME funds. In the first paragraph beginning "Under Section 42", please add “Applicant may request up to a 15% Eligible Basis increase and” to the beginning of the last sentence starting "AHFA will consider" and also add “at application” after the word “criteria” in that sentence. AHFA should allow completed projects a basis boost to allow projects to use all their eligible basis from their original allocation if needed to make the project financially feasible.	

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G. Housing Credit Allocations **3). Ownership Entity & Project Housing Credit Cap**	21	Joe Cullums / Alabama Communities, Inc.	The draft QAP establishes Housing Credit and HOME funding caps to promote a broader distribution of resources to qualifying teams and projects. We believe AHFA can better meet this objective by applying the cap to not only the Responsible Owner, but also to entities serving as the Developer and/or Guarantor for the project. Under the draft 2020 QAP language, a single development company can circumvent the caps by acting as Responsible Owner for one application and Developer and/or Guarantor for other applications. To help confirm an entity's role, AHFA could require applicants to submit the Guarantor Agreements generally required by syndicators.	No changes will be made.
G. Housing Credit Allocations **3). Ownership Entity & Project Housing Credit Cap**	21	Jason Freeman / Gateway Development Corporation	Owners who are submitting an expiring AHFA HOME deal should not have the new allocation of tax credits counted against their tax credit ownership caps	No changes will be made. The Housing Credit Cap will apply to all Housing Credit allocations.
G. Housing Credit Allocations 4. **Identity of Interest (iv)**	23	Amy Montgomery/Hall Housing Group	The Draft QAP states "Any other relationship which, while not specifically listed above, is determined to constitute an Identity of Interest because it is a relationship at least as close as an Identity of Interest described above or because it would permit an allocation that violates the intent of the Housing Credit Cap. For example, the facts and circumstances relating to relationships involving a former employer and employee or longstanding business partners could be determined to constitute an Identity of Interest." Please clarify whether for profit developers (serving only as Developer of a project) having a long business relationship with a third-party non-profit (who would be the sole General Partner Owner of a project) constitutes an Identity of Interest.	No change will be made. The Identity of Interest provisions relate to ownership interests. The relationship of employer/employee is one example of an Identity of Interest that will result in separate owners being treated as a single owner for purposes of the owner cap. In general, absent exceptional circumstances, members of a development team who do not have

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			If so, would this mean that the caps would apply to both the Developer and Owner.	an ownership interest in any application in the same cycle will not be treated as owners subject to the cap or tested for Identity of Interest with other owners in the same cycle. An example of exceptional circumstances would be when a developer, who has no ownership interests, partners with a non-profit owner to submit applications over several years, and despite this longstanding relationship, the non-profit entity does not appear to have benefitted materially from its ownership of projects, measured by rising revenues, a growing balance sheet, increased staffing and improved capacity to complete developments independently or to respond effectively to prevent or cure non-compliance issues. Under such circumstances, AHFA may deem the developer to have an Identity of Interest with the non-profit that would cause the developer to be treated as an "owner" in their common applications. The examples provided in this response are not intended to be all-inclusive.
G. Housing Credit Allocations 4. **Identity of Interest (iv)**	23	Amelia Johnson/TBG Residential	4) Identity of Interest -(iv) Please clarify which specific facts and circumstances relating to relationships involving a former employer and employee or longstanding business partners could be determined to constitute an Identity of Interest. As currently written, the language presents a gray area open to interpretation. If an experienced employee leaves a company to pursue development of LIHTC properties on their own or with another company, the current language suggests that under these circumstances, neither the employee leaving nor the former employer could apply with their own separate projects , as AHFA would see an Identity of Interest between these two parties, where the combination of these two applications would exceed the Project Housing Cap. Could AHFA also define what number of years equates to a "longstanding business partner" relationship? Also, if a developer participates in two applications, and has an Identiy of Interest with the Ownership Entity on one of those applications, does the developer's participation on the other application, where there is no Identity of Interest with the Ownership Entity, count toward toward the Credit Cap?	
G. Housing Credit Allocations 4. **Identity of Interest (iv)**	23	Amelia Johnson/TBG Residential	As a solution to the issue above, would AHFA be open to establishing maximum ownership and development interests for any given LIHTC round? With this scenario, Applicants could be limited to direct or indirect ownerhsip/development interest in a maximum of two selected projects in which the combined total Federal Credits from the competitive funding round could not exceed a predetermined amount and/or total HOME funding could not exceed a predetermined percentage of the total HOME Loan resources available.	
G. Housing Credit Allocations 4.	23	Jordan Whiteside / Vantage Development	Section(iv) under identity of interest - the comment related to former employees and longstanding business partners is too	

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Identity of Interest (iv)		************** Arrice Fault / on behalf of the Board of Alabama Affordable Housing Association ************** Jason Freeman / Gateway Development Corporation ************** Dave Truitt / CAPNA	vague. Please remove this comment or further define the comment.	
G. Housing Credit Allocations 4. **Identity of Interest (iv)**	23	David Morrow / The Morrow Companies	G.4).(iv) The comment related to formers employees and longstanding business partners is too vague. Please remove this comment or further define the comment and provide an example where the facts and circumstances relating to relationships involving a former employer and employee or longstanding business partners could be determined to constitute an Identity of Interest.	
G. Housing Credit Allocations	23	Dr. Josh Carpenter/City of Birmingham	Adding a new paragraph (5) under subsection G ("Housing Credit Allocations") that states the following: "Opportunity Zones: no less than 12.5% of AHFA'S Housing Credit Allocation for 2020 will be set aside for eligible projects in Opportunity Zones." *(see attached letter from Birmingham Mayor)*	No changes will be made.
H. Notification of Approval	23	Win Yerby/Hollyhand Dev LLC **************	Additional time for Submission of Certificate of Existence: Section H requires that an applicant submit a Certificate of Existence within 15 days of the initial notice of allocation. Typically, organizational documents are not filed with the	The timeframe for submitting the Certificate of Existence from the Secretary of State and the IRS Form #SS-4 Assignment of Employer

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		Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	local courthouse until after an applicant receives a reservation letter to avoid filing for entities that may not be needed. However, 15 days does not allow for potential delays that can be caused by courthouse staff or staff at the Secretary of State. These can occur even if applicant makes a timely filing at the courthouse and pays to expedite processing. The time frame should be amended to read "30 days" to account for events outside the control of the applicant. This additional time may delay submission of reservation packages by the AHFA but such delay will not adversely impact the development process given the amount of time required to finalize plans, prepare for closing of financing, etc.	Identification Number will be extended to 30 days after allocation notification.
I. Progress Requirements After Reservation	23	Win Yerby/Hollyhand Dev LLC	Delay Issuance of Reservation Package until August 15: Reservation packages are typically issued by the AHFA in June or July of the reservation year. The date of the reservation letter is a key date primarily due to the fact it sets the date to meet the carryover 10% test the next year. Due to the complexity of projects, delays with HOME fund appropriations, and other factors largely out of the control of the development team, projects routinely have difficulty closing financing and commencing construction by June of the following year. Some states delay the issuance of the formal reservation letter until later in the year to address these practical difficulties encountered in the development process. Accordingly, the AHFA should adopt a standard of not issuing reservation packages prior to August 15 of the allocation year. As a practical matter, the development process will begin at the time of the notice of reservation and any risks associated with the formal issuance of the reservation letter will fall on the developer. The AHFA can choose to adjust the timing of progress milestones to have them occur at approximately the same calendar dates they have typically occurred in the past.	The 2020 Reservation Packages will be mailed at least 15 days later due to extending the date for submitting the Certificate of Existence from the Secretary of State and the IRS Form #SS-4 Assignment of Employer Identification Number from 15 to 30 days after allocation notification.

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I. Progress Requirement After Reservation	24	Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	Reservation packages are typically issued by the AHFA in June or July of the reservation year. The date of the reservation letter is a key date primarily due to the fact it sets the date to meet the carryover 10% test the next year. Due to the complexity of projects, delays with HOME fund appropriations, and other factors largely out of the control of the development team, projects routinely have difficulty closing financing and commencing construction by June of the following year. Some states delay the issuance of the formal reservation letter until later in the year to address these practical difficulties encountered in the development process. Accordingly, the AHFA should adopt a standard of not issuing reservation packages prior to August 15 of the allocation year. As a practical matter, the development process will begin at the time of the notice of reservation and any risks associated with the formal issuance of the reservation letter will fall on the developer. The AHFA can choose to adjust the timing of progress milestones to have them occur at approximately the same calendar dates they have typically occurred in the past.	
I. Progress Requirement After Reservation	24 – QAP 25 – HOME	Terry Mount / DSI	On the Fire Chief letter, remove the requirement of the Fire Chief having to say that fire hydrant locations are in accordance with local development criteria. At this point in the deal progress plans are only in beginning stages and meetings with fire marshals and building departments are only beginning and final locations have not been determined. However, you may want to ask if the Fire Chief will state that before the fire department approval is given, that fire hydrant locations will be as req'd before a permit is issued and construction is allowed to start.	No changes will be made. This information is needed to clear the environmental.
4)	24	Michael Hellier / Gulf Coast Housing Partnership	We request that AHFA provide an estimated review duration for the Plan and Specifications Review from the date the Plans	No changes will be made. Generally, this process takes approximately 30

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			and Specifications are submitted to initial response. This will allow developers to better manage the closing process.	days to review, provided all required items are submitted as requested.
HOME Action Plan				
C. Application Criteria **2)**	6	Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	Contiguous site is currently defined as 'separated only by 1 neighborhood street." Scattered sites could be difficult from a management or compliance perspective; however, allowing some discretion for AHFA to consider sites that are closely related in ownership or distance to be allowed a deviation request to this limitation would be practical. Perhaps allowing sites that are currently under common management or ownership would allow development in some areas where desirable land is scarce or where existing units are in need of rehabilitation. Consider a distance of .1 mile and not more than two (or three) parcels.	No changes will be made.
D. Fees	8	Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA)	LIHCA recommends that AHFA consider reducing the application fee for projects that want to develop a 100% permanent supportive housing project.	No changes will be made.
G. Loan Structure **2) Eligible Activities and Costs**	12	Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA)	LIHCA recommends that AHFA utilize HOME funds for activities other than new construction of residential rental housing. Reason: The federal HOME program provides for eligible activities of homeowner rehabilitation, homebuyer programs, and rental subsidies. Rehabilitation activities are often used by local governments and nonprofits to stabilize communities and address health and safety issues in dilapidated homes. Rehbilitation is a key principle of smart growth strategies and better utilizes existing infrastructure and services. Affordable homeownership is another activity typically supported with HOME funds. It not only helps families obtain homeownership, it also supports the local tax	No changes will be made. AHFA allocates HOME funds towards the production of new residential rental housing for low-income households by utilizing loans to promote the production of affordable housing to meet the needs as identified in the State's Consolidate Plan. In addition to this, AHFA has other affordable housing programs that have helped more than

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			base and stabilizes marginal communities. By expanding the state's HOME eligible activities, funds could be used to stabilize and improve blighted communities through rehabilitation, address health and safety issues of lower income homeowners, and create more decent and safe housing opportunities for individuals with low incomes.	70,000 families purchase homes. Funds available through programs at AHFA, local governments and non-profits together help to stabilize and improve communities by rehabilitation of existing rental units, adaptive reuse and creating new decent and safe housing opportunities for individuals throughout the state.
G. Loan Structure 2) Eligible Activities and Costs, **14. Applying for funds**	13	Chris Hall / Tuscaloosa Housing Authority ************** Terry Mount / DSI	Currently, the AHFA awards HOME funds only for applications made during the competitive 9% allocation process. However, additional 4% bond funded projects could be completed if AHFA made HOME funds available in an amount similar to the funds awarded to 9% transactions. The allocation of AHFA HOME funds could be made available only on a matching basis for these transactions. In particular, certain public housing authorities utilizing the RAD program and Section 18 could consider 4% transactions if additional AHFA HOME funds were available to be combined with local and PHA funding. The timing flexibility available under the 4% bond program also allows the applicant to pursue other sources of gap funding to help complete projects. Repaid HOME loan funds should be made available as well for these transactions. Utilizing the HOME funds in this fashion will also reduce the need to use 9% credits as the only mechanism for HOME funds to be awarded. Participating jurisdiction counties should also be eligible for HOME funds on 4% bond transactions as many of these jurisdictions do not receive HOME funds in amounts equal to the amounts allocated by the AHFA on HOME projects.	This section will be revised as follows: Applying for Funds: Applications for Alabama HOME funds may be made to AHFA during a competitive application cycle (funding decisions will be based upon the project selection criteria and point scoring system as detailed herein and Addendum A). If funds are available after the competitive application cycle, AHFA may consider an application under AHFA's Multifamily Housing Revenue Bond program for new construction application(s). Due to the limited amount of HOME funds, applications combining HOME funds with Multifamily Housing Revenue Bonds will be considered

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G. Loan Structure 2) Eligible Activities and Costs, **14. Applying for funds**	13	Mary Mayrose / Phenix City Housing Authority	Currently, the AHFA awards HOME funds only for applications made during the competitive 9% allocation process. However, additional 4% bond funded projects could be completed if AHFA made HOME funds available in an amount similar to the funds awarded to 9% transactions. The allocation of AHFA HOME funds could be made available only on a matching basis for these transactions. In particular, certain public housing authorities utilizing the RAD program and Section 18 could consider 4% transactions if additional AHFA HOME funds were available to be combined with local and PHA funding. The timing flexibility available under the 4% bond program also allows the applicant to pursue other sources of gap funding to help complete projects. Repaid HOME loan funds should be made available as well for these transactions. Utilizing the HOME funds in this fashion will also reduce the need to use 9% credits as the only mechanism for HOME funds to be awarded.	on a first-come, first-served basis for applications received by AHFA between September 1, 2020 and December 1, 2020. All applicants must meet the 2020 HOME Action Plan with the following restrictions and exceptions: 1. No more than fifty (50%) percent of the AHFA annual HOME allocation will be allocated towards funding Multifamily Housing Revenue Bond projects. 2. Acceptable applications will include projects located in a city or county that is a HUD approved participating jurisdiction and receives its own allocation of HOME funds. 3. Acceptable applications will include projects with greater than 56 units. 4. For applications with missing and/or incomplete documents, the applicant will have thirty (30) business days to provide the required item(s) or document(s) and applicable fee(s). 5. Applications will not be evaluated using a Point Scoring System. However, each application must also meet the Multifamily Housing Revenue Bond requirements per the

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				2020 Housing Credit Qualified Allocation Plan. 6. AHFA will not consider an application for a proposed project located within a two (2) mile radius of an AHFA project approved during the 2019 or 2020 Application Cycle, with no exceptions.
C. Application Threshold Requirements **9) Applications submitted in other Participating Jurisdictions**	17	David Morrow / The Morrow Companies	(9.) We request AHFA consider state HOME loan applications from any applicant (not just CHDO) on a site located in a Participating Jurisdiction if a local HOME loan commitment from the Participating Jurisdiction is included in the AHFA application. Otherwise, the resources of the PJ cannot be utilized in the development or be a benefit to AHFA by using less state HOME or tax credit resources. This would allow for more combined funding sources and allow PJs to spend their HOME funds on adding new housing rather than on a few houses or supplementing other operating agency budgets so that housing is actually built.	No changes will be made. CHDOs are allowed to apply for AHFA HOME funds in a PJ because the service areas of some nonprofits are solely within a Participating Jurisdiction (PJ), which prevents them from being able to apply for CHDO designation outside the PJ.
C. Application Threshold Requirements **9) Applications submitted in other Participating Jurisdictions**	17	Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Jason Freeman / Gateway Development Corporation ************** Dave Truitt / CAPNA	AHFA should not allocate HOME funds to a CHDO who submits an application in a participating jurisdiction. PJ's already have their own commitment of HOME funds.	

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IV. C. Application Threshold Requirements **10) Environmental Site Assessment**	17 (pg 12 in QAP)	Russell Griebel/United Consulting ************** Jordan Whiteside /Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	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 consultants 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 representatives 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 Phase II Environmental Assessments to be addressed between the parties.	No changes will be made. AHFA notes that the determination about whether environmental reports are considered complete is not a matter of opinion but is made strictly on the basis of whether the reports are in compliance with Addendum B and the regulations and guidance cited therein at that time of application.
E. Application Evaluation, **(v) Reasonableness of Project Costs**	22	Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA	LIHCA recommends that AHFA not penalize projects that have higher than average per unit costs if the proposed project is incorporating green building techniques above and beyond the requirements of the QAP. Green building materials or techniques may have a higher per unit cost. Give that Alabama could benefit from more projects that incorporate green building, we ask that AHFA not disincentivize developers from incorporating green building into their projects.	No changes will be made.
A – Point Scoring System				
	A-1	Amon Martin / Pennrose LLC ************** Quisha Riche / Huntsville Housing Authority	Distribution of Housing Credits - We appreciate AHFA's desire and efforts to distribute Housing Credits throughout the state; however, we also realize that the major metropolitan areas have a much greater need for affordable housing due to population, age of affordable housing, and metropolitan growth rates. The affordable housing stock in the larger cities	No changes will be made.

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			is very old and unsafe and has a high demand with high waiting lists with a growing population rate. We recommend that AHFA provide for an allocation for up to two projects per county for Jefferson, Mobile and Madison Counties.	
Application Selection Procedures (2)	A-1	Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Jason Freeman / Gateway Development Corporation ************** Dave Truitt / CAPNA	Please allow up to 2 AHFA HOME rehabs to be funded in the same county	No changes will be made.
Application Tie-Breakers	A-2	Randall Morgan Smith/BREC Development	We ask AHFA to add a point criteria or tie breaker to award the projects that have lower total development cost per unit. Example: if one project can build 100 units for $10,000,000 or $100,00 per unit and another project can only get 100 units for $12,500,000 or $125,000 per unit shouldn't AHFA award the project that gets more units built with extra points? This would be an easy way to keep all projects built efficient as possible and ensure the maximum number of units are built.	This section will be revised as follows: The following new tiebreaker will be added as #7 and the current #7 tiebreaker will be moved to #8. In the event there is a tie in scoring among two or more applications, then a recommendation will be made for the application that has the least amount of aggregate participation by any one Developer or key principal. Aggregate participation is defined as the total of all Housing Credit and
Application Tie-Breakers	A-2	Joe Cullums / Alabama Communities, Inc.	We believe the QAP can better meet its objective for a broader distribution of resources by revising tiebreaker #1 to consider the aggregate participation of the Developer / Guarantor, in addition to the Responsible Owner. We believe this is better aligned with the QAP's objectives than evaluating only the Responsible Owner's participation, as the Responsible Owner may actually have a very limited role in the development	

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			activities as well as a minor share of the development fees compared to the Developer/Guarantor. The QAP could evaluate this tiebreaker according to the aggregate participation of "Project Participants", defined as the Responsible Owner, Developer and Guarantor (likely the same entity as Developer).	HOME/Housing Credit applications recommended for allocation in the current application cycle.
Application Tie-Breakers	A-2	David Morrow / The Morrow Companies	Tiebreaker 3 Giving priority to a project to go to the county with the fewest number of Active AHFA Projects does not accurately show equitable distribution of funds among the counties. Rather, the tiebreaker priority should be to the lowest percentage of AHFA units funded per capita in each county.	
Application Tie-Breakers	A-2	Joe Cullums / Alabama Communities, Inc.	AHFA should consider including a new tiebreaker priority, prior to the random drawing (Tiebreaker #7), for a Responsible Owner which was not selected in the prior year's competitive funding round as a result of the random drawing. All else being equal, we believe it would be fair to provide a slight advantage to the Responsible Owner that submits another worthy application rather than having it be subject again to the random draw. In this situation, the competing Responsible Owner not selected as a result of this tiebreaker could benefit from it the following year.	
A. Points Gained 1.) Project Characteristics (i.) Type of Constructions **(a.)**	A-3	Michael Hellier / Gulf Coast Housing Partnership	In order to concentrate limited resources towards the construction and preservation of critically important affordable housing, consider modifying the point structure for extra amenities. One suggestion is to retain the 25 point maximum, but increase the points awarded for certain amenities. This would result in fewer required amenities per project.	No changes will be made.
A. Points Gained 1.) Project Characteristics	A-4	Mary Ellen Judah / Neighborhood Concepts, Inc.	Please consider awarding points to rehabilitation projects for rehabilitation construction items that have been replaced within the past 3-5 years as verified by an independent architect. In doing so, AHFA can help prevent wasteful	No changes will be made. *Per your example provided, the project would likely receive points*

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Rehabilitation Projects Only			practicies of wholesale replacements for points when an existing property has new or like new items. As example, a property that has replaced 25% of HVAC units within the past 24 months as independently verified in the CNA should only need to replace the remaining 75% of units in order to qualify for points.	*as verified by the Capital Needs Assessment and Architect's Certification.*
(ii) Energy/Water Conservation and Healthy Living Environment	A-5	Rory L. McKean / McKean & Associates, LLC	(ii.) Per the EPA website, Kitchen faucets are not listed as being Water Sense rated. Kitchen faucets should be low flow.	Changes will be made as follows: *EPA's Partnership Program "Watersense" labeled water closet, bathroom faucets and showerheads.*
(ii) Energy/Water Conservation and Healthy Living Environment	A-5	Lisa Bianchi-Fossati / Southface Institute	Efficiency Standards - Southface applauds AHFA's inclusion of an Energy/Water Conservation and Healthy Living Environment section within the Scoring criteria of the 2020 QAP. Southface recommends further energy efficiency measures within this section, including high performance building envelope criteria and specifications for equipment efficiency. Since these developments are funded through the use of public dollars, they should be held to higher standards than those set by minimum building codes. Clearly defined, measurable standards would produce healthier, more resource-efficient homes and keep energy and water costs reliable and low.	No changes will be made.
(ii) Energy/Water Conservation and Healthy Living Environment	A-5	Lisa Bianchi-Fossati / Southface Institute	Sustainable Building Certification - Southface encourages AHFA to consider introducing sustainable building certification as an option for points within the Scoring criteria. Sustainable building certification programs facilitate high quality resource- efficient building practices and a heathier and more affordable life for residents in LIHTC properties. AHFA has the opportunity to incent high performance building through this section of the QAP. A number of Southeastern states have introduced sustainable	

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			building certification into the threshold criteria of their QAPs (i.e., Florida, Georgia, Louisiana, and Mississippi). Other states have carved out opportunities to achieve additional points in their Scoring criteria through sustainable building certification (e.g. Tennessee, Texas). These requirements have improved the quality of affordable housing in these states and have ensured that developers are fully aware of the expectations set by each state. Developments that achieve sustainable building certifications perform better than developments that do not achieve certification in terms of construction and development costs, utility costs, energy efficiency and overall resident satisfaction. In 2015, Southface and the Virginia Center for Housing Research conducted a year-long study of 18 LIHTC projects across the Southeast, including properties in Alabama. The results of the study supported the theory that building certification programs provide cost-effective paths to resource-efficient design and construction resulting in efficient homes: Developments pursuing building-level certifications were nearly 5% less expensive in total construction costs per square foot and more than 13% less expensive in soft construction costs than their conventional counterparts. Conventional code-built developments were only 1.6% less expensive in hard construction costs when compared to projects pursuing building-level certifications. Families residing in certified developments saved nearly $96/year; seniors saved more than $122/year. Certified developments save nearly $5,000/year on owner-paid utility costs when compared to their conventional counterparts. Southface encourages AHFA to consider introducing sustainable building certifications to the Scoring criteria in order to incent best practices for building performance and provide residents with healthy housing and affordable energy	

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			costs while keeping hard and soft costs of development low and reasonable.	
(ii) Energy/Water Conservation and Healthy Living Environment	A-5	Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA)	LIHCA applauds and appreciates the energy and water conservation incentives in the QAP. We recommend that AHFA further incentivize developers to incorporate additional design elements that support green practices and/or healthy living, which could include additional points (10 point maximum instead of 8 point maximum) for projects that can achieve a certification from Enterprise's Green Criteria, LEED, or other green building certification.	
(iii.) Rent Affordability **(a.) New Funds**	A-5	Joe Cullums / Alabama Communities, Inc.	The 2020 Draft QAP appears to have very similar criteria as the Final 2019 QAP regarding the New Funds point category. In the 2019 competetive funding round, AHFA allowed applicants to simply add together the loan amount available during construction to the amount available as permanent financing in order to qualify for the points. To use an example, a 50-unit deal would need a commitment for $800,050 in eligible funds to qualify for the full 5 points. In the 2019 round, AHFA would have granted the full 5 points to this deal if it had just $400,025 in at the construction phase, and another $400,025 provided for permanent financing even though the original construction loan was paid back in full at conversion. All that AHFA required was a note on the commitment letter stating that a total of $800,050 was committed, even if just half that amount were actually available at any point to help leverage the deal. We believe that the logical and broadly shared interpretation of the QAP, using the example above, is that the project would need a commitment for the full $800,050 to actually be available to the project at a single point in time. Under AHFA's interpretation, a funding agency taking just $400,025 in risk was able to achieve the same points as a different agency that	Changes will be made in this section as follows: A maximum of 5 points will be given to projects that have a commitment for AHFA-approved sources of new funds from the following list: Federal Home Loan Bank for Affordable Housing Program (AHP) funds (AHP funds must be in the form of a grant), HOME Funds (not awarded by AHFA), USDA Rural Development 515 funds, CDBG (Entitlement, State, Mitigation and Disaster Recovery Programs) CHOICE Neighborhood funds and/or NeighborhoodWorks Capital Grant. 5 points – $16,001+ per unit 4 points – $12,001 - 16,000 per unit 3 points – $8,001 – 12,000 per unit 2 points - $4,000 – 8,000 per unit

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			essentially put $800,050 at risk. We believe this section of the QAP is broadly misinterpreted and should be clarified for the final version of the 2020 QAP.	
(iii.) Rent Affordability **(a.) New Funds**	A-5	Mary Ellen Judah / Neighborhood Concepts, Inc.	Please consider removing the language in Section (iii)(a) that states that the assumption of existing funds does not qualify for points if the assumption is part of a property acquisition and an acquisition funding source. Assuming the soft debt on favorable terms still has the effect of subsidizing the property and ensuring rent affordability as it covers a portion of the acquisition price and therefore does not require new conventional debt to fund 100% of the acquisition cost.	
(iii.) Rent Affordability **(a.) New Funds**	A-5	Amy Montgomery/Hall Housing Group	Consider changing the points for Capital Magnate Funds so that these funds can get the points so long as they are provided to the project in the form of truly soft funds. For example, they should match the requirements of the AHP funds in that they are provided as a long term (15 years), deferred payment or interest only loan. Or, you could set the requirements so that the loan must bear interest at below the 10 year T-bill (or some other index) for the entire term, making them truly soft loans.	
(iii.) Rent Affordability **(a.) New Funds (1.)**	A-5	Joseph Raines/United Bank	(iii) RENT AFFORDABILITY, (a) NEW FUNDS, (1): Request that the Capital Magnet Fund grants be replaced with "any grant or soft loan from a certified Community Development Financial Institution. This request is made based on the following: Certified CDFls are the only entities that can be awarded Capital Magnet Funds from the US Treasury. As Certified CDFls, these entities have access to a broad array of additional sources of capital beyond just the CMF program, capital which could also be used for supplemental grants and soft loans like the other programs listed in this subsection. There are 20 certified CDFls based in Alabama, and others outside of the state that are providing resources in multiple ways to meet their mission of providing credit,	

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			capital, and financial services to underserved populations and communities. The process of becoming a certified CDFI, and maintaining certification, is rigorous and monitored on an annual basis. Certification is not merely completing an application; an entity must have a primary mission of promoting community developments, serve one or more Target markets, maintain accountability to its defined Target markets, and provide development services in conjunction with its financing activities. Supplemental information on the certification and re-certification process is attached. In summary, amending this category would broaden the number of organizations that could potentially provide supplemental funds to projects in Alabama, per AHFA's housing priorities in 1B of this document (Projects that use additional assistance through federal, state, or local subsidies) *(see attachment "Requirements for CDFI Certification")*	
(iii.) Rent Affordability **(a.) New Funds (1.)**	A-5	Joe Cullums / Alabama Communities, Inc.	Capital Magnet Funds should not be considered an eligible source for the New Funds point category. These funds are not competitively awarded to sub-recipients. As a result, the CDFI may make these funds available only if the developer is willing to use its other lending products or syndication services, or simply has an existing relationship with the bank/CDFI. The other eligible sources listed in this category are administered through a transparent process and do not encourage quid pro quo arrangements. Additionally, CDFI's typically integrate these funds into a larger lending pool, making it difficult to verify the true funding source based on a commitment letter alone. Also, when CMF funds are administered to sub-recipients, these loans have interest rates more in line with conventional loans than the other eligible sources for New	

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			Funds, making it more misaligned with the policy goals of this point category. For New Funds to qualify, we believe interest rates should be significantly lower than conventional debt, which works to benefit tenants by allowing for lower rents to support the debt. As an alternative to completely removing the funds, AHFA could make the points available only to direct recipients of Capital Magnet Funds, which are competitively awarded and announced by the Treasury Department.	
(iii.) Rent Affordability **(a.) New Funds**	A-5	Kristina Stone / United Bank	In Section 1(iii)(a)(1) New Funds, add language for any "grant or soft loan received from a certified CDFI" to the list of AHFA-approved sources of new funds. An award from a certified Community Development Financial Institution (CDFI) provides supplemental soft funds to affordable housing developments that have a demonstrated need for additional capital. These grants and loans represent low cost, flexible sources of financing designed to assist developers in meeting their budget needs in a time of rising construction costs and limited resources. The CDFI Fund serves mission-driven financial institutions that take a market-based approach to supporting economically disadvantaged communities.	
iii.) Rent Affordability **(a.) New Funds**	A-5	David Morrow / The Morrow Companies	(a)(1) New Funds Please consider adding CDFI (Community Development Financial Institutions) funds and other funds that would be below market rate (such as AFR) financing to the list of AHFA-approved sources of new funds as they are a widely used source for affordable housing.	
(iii.) Rent Affordability **(a.) New Funds**	A-5	Joseph Raines/United Bank	(iii) RENT AFFORDABILITY, (a) NEW FUNDS, (1): Further define loans eligible for points under this section. The current language reads: "If the funds are loaned (required repayment) or granted to the project, at least 50% of the total amount of funds committed for points must remain as a permanent source of funds." Under this current language, it would be possible for an organization to grant or loan	

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			funds to a project, and 50% of those funds be immediately repaid at closing. Request the following change: Funds committed for points as loans must be "soft", defined as: No required repayment of principal or interest for a minimum of 15 years (20 years if project also has HOME loan(s); Nonrecourse; significantly below market interest rate (at least 2% below Prime) For grants, 100% of the funds must remain in the project a minimum of 15 years (20 years if project also has HOME funds) As an alternative, soft loans could be allowed to be paid interest only for the same terms, but principal must remain as permanent capital per the 15/20 year term above. This proposed change would ensure that all supplemental funds being provided would stay in the projects as permanent capital, as intended, and not potentially be used merely to gain application points.	
(iii.) Rent Affordability **(a.) New Funds (1.)**	A-5	Dr. Josh Carpenter/City of Birmingham	In the "Rent Affordability" section, we recommend adding to the end of (iii)(a)(l) "or a binding commitment from a Qualified Opportunity Fund acceptable to the executive director"	
iii.) Rent Affordability **(a.) New Funds (1.)**	A-5	David Morrow / The Morrow Companies	(a)(1) New Funds Please consider adding HUD Section 202 funds to the list of AHFA-approved sources of new funds as this is a widely used source for affordable housing.	
(iii.) Rent Affordability **(a.) New Funds (1.)**	A-5	Sharon Tolbert/Auburn Housing Authority	(iii) RENT AFFORDABILITY, (a) NEW FUNDS, (1): The Section 108 Loan Guarantee Program (Section 108) provides for a loan guarantee component of the Community Development Block Grant (CDBG) Program. Section 108 provides communities with low-cost, flexible financing for economic development, housing rehabilitation, public	

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			facilities, and other physical infrastructure projects. Since CDBG funds are an approved AHFA funding Source, AHFA should consider including Section 108 as an approved source of new funds since the program is a component of the CDBG program.	
((iii.) Rent Affordability (a.) New Funds **(2.)**	A-6	Cynthia Prater/The Bennett Group ************** Fred Bennett / Bennett & Company, LLC ************** Ann Marie Rowlett / Rowlett & Company, LLC	A maximum of 3 points are currently available to projects that have a commitment for new funds coming from a Capital Fund Program, Public Housing Sales Proceeds, and/or HUD Replacement Housing Factor Funds. For PHAs that have already converted to RAD, any balance available in those funds would be drawn down and deposited in a Replacement Reserve account (to comply with the RAD PBV requirements). If a PHA is able to utilize those reserve funds to renovate existing housing or development new housing, AHFA should incentivize them to do so with an equal award of points. At a minimum, AHFA should allow PHAs to provide evidence that the reserves were obtained from 1 of the 3 named sources and award points accordingly.	No changes will be made.
(iii.) Rent Affordability **(a.) New Funds (2)**	A-6	Amon Martin / Pennrose LLC ************** Quisha Riche / Huntsville Housing Authority	New Funds: We appreciate AHFA's desire to reward projects that leverage other public resources along with the LIHTCs. In order to leverage more public funds to the projects, we recommend AHFA consider additional financing sources from Public Housing Authorities (PHAs) such as Program Income as a qualified source. PHAs may have additional sources of financing to contribute to preserving or creating affordable housing. The financing can be structured as favorable construction/permenant loan (i.e. below market interest rate, cash flow payment only, etc.) or Grant, and provide additional leveraging in addition to the the sources currently listed.	
(iii.) Rent Affordability **(a.) New Funds (2.)**	A-6	Sharon Tolbert/Auburn Housing Authority	(iii) RENT AFFORDABILITY, (A) NEW FUNDS (2): Based on the maximum points and per unit cost, Public Housing received less points and the per unit cost is higher. AHFA should consider making the point allocation and per unit cost	

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			more equitable compared to point allocation and per unit cost of the AHFA approved sources outlined in Section iii Rent Affordability (a) New Funds (1).	
(iii.) Rent Affordability **(a.) New Funds (2.)**	A-6	Sharon Tolbert/Auburn Housing Authority	iii) RENT AFFORDABILITY, (A) NEW FUNDS (2): Public Housing Authorities (PHAs) that have converted its public housing portfolio to site-based Section 8/poject-based vouchers (PBV) or project-based rental assistance (PBRA) as part of HUD's Rental Assistance Demonstration (RAD) no longer receive Capital Fund Program (CFP) and Replacement Housing Factor Funds (RHFF) in a traditional sense. The current point structure penalizes PHAs that have converted to RAD PBV or PBRA. Upon RAD conversion, PHAs that had a balance in its CFP and PHFF accounts were allowed to draw the balance and deposit the funds into a Reserve Replacement account to be used for future modernization; CFP and RHFF are used for the same purpose. To verify, AHFA may require PHAs to provide documentation that the Replacement Reserves account wa initially categorized as one of the three AHFA-approved sources of funds. In addition, upon RAD conversion, PHAs operating subsidy and CFP funding were combined and termed as a housing assistance program (HAP) which is now funded through a PHA's Housing Choice Voucher (HCV)/Section 8 Program. Based on this information, AHFA should consider allocating points to PHA that have converted its public housing portfolio to RAD PBV or PBRA in an effort to make the scoring fair for all PHAs whether they operate traditional public housing, RAD PBV or RAD PBRA.	
(iii.) Rent Affordability **(a.) New Funds (2)**	A-6	Monique Pierre / Montgomery Housing Authority	Rent Affordability (a.) New Funds. The Montgomery Housing Authority (MHA) appreciates AHFA's incentives to leverage new funds from both federal and non federal sources under subitems (1) and (2). However MHA requests that AHFA revisit the point scoring. MHA would like to see the maximum points allowed increased from 3 points to 5 points for projects with a commitiment of	

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			Capital Fund Program, Public Housing Sales Proceeds and HUD Replacement Housing Factor funds. MHA would like AHFA to treat all new leveraged funds with the same degree of value for the application scoring purposes.	
iii.) Rent Affordability **(a.) New Funds (2)**	A-6	Monique Pierre / Montgomery Housing Authority	Rent Affordability (a.) New Funds. As housing authorities are now able to convert public housing units to Section 8 voucher units under the Rental Assistance Demonstration (RAD) Program, the Montgomery Housing Authority would like AHFA to consider RAD-eligible funding as "new funds". Under the RAD program, HUD identifies the following funds as eligible: 1) Operating Reserves, 2) Capital Funds, 3) Replacement Housing Factor (RHF) funds, and 4) Demolition and Disposition Transitional Funding (DDTF).	
(iii.) Rent Affordability **(a.) New Funds (2)**	A-6	Amon Martin / Pennrose LLC ************** Quisha Riche / Huntsville Housing Authority	New Funds: We appreciate AHFA's desire to reward projects that leverage new funds from Public Housing Authorities (PHA): Capital Fund Program (Capital Funds) and HUD Replacement Housing Factor Funds (RHFF). These sources are favorable financing that are contributed and are structured nearly identical to the favorable financing sources in Section (a) New Funds (1). However, there is a higher threshold of PHA funds required in order to achieve a comparable score to the new funds in Section (1). This is unfair to the PHAs. Capital Funds and RHFF funds can be used to leverage additional resources to the project nearly identical to the New Funds in Section (1). We do not understand why PHA sources are held to a higher threshold and are treated differently, as it relates to scoring thresholds, than the New Funds in Section (1). We recommend that AHFA treat PHA funds (Capital Funds and RHFF) equally as the New Funds in Section (1).	
(iii.) Rent Affordability **(a.) New Funds (2.)**	A-6	Willie B. McMahand / Anniston Housing Authority **************	Capital Funds and Replacement Housing Factor Funds should receive the same points in the HOME Action plan as they receive under the QAP.	

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		Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities		
(iii.) Rent Affordability **(a.) New Funds (2)**	A-6	Ann Marie Rowlett / Rowlett & Company, LLC	New Funds: AHFA should consider accepting funding from Public Housing Authorities that have already converted their portfolios to RAD as additional subsidy for points if the PHA can demonstrate that the funds that they currently have in reserve replacement accounts were once Capital Fund Program (CFP) and/or Replacment Housing Factor Funds (RHFF). These reserve replacement funds, which were previously funds that would have counted for additional subsidy, are still a soft source of funding that will make their projects financially feasible.	
(iii.) Rent Affordability **(b.) Existing Funds**	A-6	Michael Hellier / Gulf Coast Housing Partnership	2 or 3 points for assumption of a 515 loan is too high. This is not a "cash" subsidy that can be used to pay costs related to the redevelopment of a property but simply a paper transaction. Subsidy points allotted for assumption of an existing loan, if given at all, should be minimal.	
(iii.) Rent Affordability **(b.) Existing Funds**	A-6	David Morrow / The Morrow Companies	(b) Existing Funds The $10,000 minimum threshold for USDA 515 loans under this section is too high. Older RD properties that are generally more in need of rehab have lower principal balances due to the age of their loans. Very few RD properties meet the $30,001 threshold. Please consider revising the scoring tier as follows: 5 points - $20,001 or more per unit 4 points - $15,001 to $20,000 per unit 3 points - $10,001 to $15,000 per unit 2 points - $5,000 to $10,000 per unit	
(iii.) Rent Affordability	A-6	Joseph Raines/United Bank	(iii) RENT AFFORDABILITY, new subsection: Propose that 2 points be awarded for a project that sets aside 25% or more units for 50% AMI or less. With the minimum 20% requirement to be eligible for HOME funds, a point award as	

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			a "bonus" for 5% more 50% units would be appropriate incentive to ensure more units for very low income families and individuals	
(iii.) Rent Affordability	A-6	Joseph Raines/United Bank	(iii) RENT AFFORDABILITY, new subsection: Propose that 1 point be awarded for a project that sets aside 3 or more of its units for 30% AMI or less. This would be inclusive of the 50% AMI, so of the 50% AMI units, if a minimum of 3 these units are for 30% AMI tenants, 1 point would be awarded. This would provide incentive to grow the number of housing units in our state that is available to Extremely Low Income families and individuals	
(iii.) Rent Affordability **(c.) Rental/Operating Subsidies**	A-6	Sharon Tolbert/Auburn Housing Authority	(iii) RENT AFFORDABILITY, (c) RENTAL/OPERATING SUBSIDIES: Assuming AHFA considers site-based Section 8, including RAD Section 8/PBV, would be included under subsidies from HUD or public housing, confirmation is required. If not, AHFA should consider including site-based section 8 (including RAD PBV) as rental/operating subsidy from HUD or a PHA.	The following changes will be made to this section: • HUD (HUD through PHA) commitment must be for at least 25% of the total proposed units to receive the points.
(iii.) Rent Affordability **(c.) Rental/Operating Subsidies**	A-6	Chris Retan/Aletheia House	It is our understanding that HUD regulations limit the amount of project-based vouchers that can be provided on the family project to the maximum of 25 units or 25% of the units (See Section 8(o)(13) of the U.S. Housing Act of 1937 (42 U.S.C. 1473f(o)(13)). Regulations are at 24 CFR part 983). This means it would be impossible for a family project that is more than 50 units to get the 2 points for HUD vouchers. It is also inconsistent to require only 25% of the USDA Rural Development subsidized units to be subsidized to earn points but 50% of the HUD subsidized units to be subsidized to earn points. This requirement should be changed so 2 points will be earned when at least 25% of the units are HUD subsidized.	

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(iii.) Rent Affordability **(c.) Rental/Operating Subsidies**	A-6	Mary Ellen Judah / Neighborhood Concepts, Inc.	Rental/Operating Subsidies: The current language awards points for projects that have a commitment for rental assistance through PHA for 50% of units. It is our understanding that the Housing Opportunity Through Modernization Act of 2016 states that with certain exceptions, only the greater of 25 dwelling units or 25% of the dwelling units may be assisted under a project-based HAP contract.	
(iii.) Rent Affordability **(c.) Rental/Operating Subsidies**	A-6	Amon Martin / Pennrose LLC ************** Quisha Riche / Huntsville Housing Authority	Rental/Operating Subsidies: We appreciate AHFA's intent to award points to projects that have rental/operating subsidies. These subsidies allow a project to target units at lower incomes thresholds. The threshold for a HUD commitment of rental/operating subsidy (50% of units) is considerably higher than USDA Rural Developments (25% of units). The requirement for 50% of a project to have a HUD commitment of rental/operating subsidy creates a concentration of poverty. Our attorneys have identified concerns regarding the implications of forcing 50% or more of a project to be subsidized with rental/operating subsidy. This requirement could create and violate HUD's Fair Housing requirements. As you know, over the last few years, HUD has been working to reduce the concentration of subsidized housing. We highly recommend reducing the requirement for HUD commitment for rental/operating subsidy to 25% of a project. Also, while HUD rental/operating subsidies are key and critical tools to creating and preserveing affordable housing, these are very scarce and limited resources. Concentrating over 25% to one project reduces the impact that a HUD Commitment of rental/operating subsidy can make to preserving and creating new affordable housing projects.	
	A-6	Monique Pierre / Montgomery Housing Authority	Rent Affordability (c.) Rental/Operating Subsidies. The Montgomery Housing Authority (MHA) strives to provide affordable quality housing within the community. MHA therefore requests AHFA consider reducing the percentage of required HUD-subsidized units in the transaction from 50% of	

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			total units to 25% of total units. MHA believes this would both be consistent with the USDA Rural Development commitment percentage and allow maximum flexibility in developing healthy vibrant affordable communities that are not heavily subsidized. Rent Affordability (c.) Rental/Operating Subsidies. The Montgomery Housing Authority (MHA) strives to provide affordable quality housing within the community. MHA therefore requests AHFA consider reducing the percentage of required HUD-subsidized units in the transaction from 50% of total units to 25% of total units. MHA believes this would both be consistent with the USDA Rural Development commitment percentage and allow maximum flexibility in developing healthy vibrant affordable communities that are not heavily subsidized.	
(iv.) Tenant Needs (d.)	A-6	Sharon Tolbert/Auburn Housing Authority	(iv) TENANT NEEDS, (d) AHFA should consider including targeting households on a PHA's site-based Section 8/RAD PBV wait list for PHAs that have converted its public housing portfolio to site-based Section 8/RAD PBV.	No changes will be made. Points are currently awarded for targeting the households on the public housing waiting list.
(iv.) Tenant Needs	A-6	Kristina Stone / United Bank	In Section 1(iv) Tenant Needs, add language to award 2 points for a project that sets aside at least 40% of units for households at 50% AMI or below, thereby ensuring more units available for very low income households. Also, increase the points available in this section to a maximum of 7 points.	
A. Points Gained **(v.) Project Type (a.)**	A-7	Cynthia Prater/The Bennett Group ************** Fred Bennett / Bennett & Company, LLC ************** Jason Freeman / Gateway	The draft QAP currently indicates that 6 points will be awarded for a proposed project that has a fully executed commitment for a 15-year extension of the project's original AHFA HOME loan. To obtain a 15-year extension, projects are currently required to pay down 30% of the their original AHFA HOME loan. Unfortunately, not all of these projects have (or are able to obtain) the funds necessary for said paydown as they are located in rural areas that have seen little to no economic growth since they were initially constructed.	No changes will be made.

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		Development Corporation Ann Marie Rowlett / Rowlett & Company, LLC	Expiring/expired AHFA HOME loan developments should be allowed to apply for a 15-year extension with less than a 30% paydown if they are able to provide AHFA with documentation indicating what percentage they can afford. Points awarded for having a fully executed commitment for a 15-year extension could then be scaled based on the percentage of paydown, i.e., 4 points for a 10% paydown, 5 points for a 20% paydown, and 6 points for a 30% paydown.	
A. Points Gained **(v.) Project Type (a.)**	A-7	Ann Marie Rowlett / Rowlett & Company, LLC	AHFA should consider accepting lower HOME loan paydowns from expiring HOME loan projects that can demonstrate that it is not financially feasible for the property to obtain a loan or have the funds to pay down 30% of the principal and accrued interest. A large number of the HOME projects in the state were funded in rural, low income areas, that have not seen financial growth over the past 20 years. In fact, some of these areas are even more depressed than at the time of the initial application. If AHFA would be willing to look at each project on an individual basis to determine the projects availability to pay down the HOME loan and award points on a sliding scale, i.e. 4pts for 10%, 5pts for 20%, and 6pts for 30%. This would allow those expired HOME projects in very rural low income areas a chance to compete and get the additional tax credit funding that they need to make the units viable for another 20 years.	
A. Points Gained **(v.) Project Type (a.)**	A-7	Michael Hellier / Gulf Coast Housing Partnership	Points should not be awarded for paying off an existing HOME loan. This is an owner commitment similar to a compliance commitment. Owners should not be rewarded for doing what they committed to do in the first place. Indeed, it should be a "negative action", or a loss of compliance points, if a loan is not paid off by the maturity date. In addition, paying off of a loan for an existing project does in no way make it a "better" project as compared to other submittals.	

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			We understand there may be other issues AHFA is concerned about that are driving these points. If necessary, another option is to develop a set-aside, similar a CHDO set aside, in which these properties could compete. However, these applications should not roll to the general pool affecting other applications. The individual applicants would have the choice to compete in the set-aside or the general pool.	
A. Points Gained **(v.) Project Type (a.)**	A-7	David Morrow / The Morrow Companies	Please require prospective HOME rehab applicants to file their paydown and extension application with AHFA at least 120 days prior to the LIHTC application due date and distribute notice to the development community or post on the AHFA website at least 90 days prior to the LIHTC application due date a list of all owners of expiring HOME loan projects that have notified AHFA that they intend to repay or pay down 30% or more of their existing HOME loans and seek an extension. Developers need to know this information well in advance in order to evaluate potential application sites.	
A. Points Gained **(v.) Project Type (b.)**	A-7	Amelia Johnson/TBG Residential	v.) Project Type (b.) Please define what constitutes "sufficient evidence" AHFA expects to receive for a project that qualifies for the Alabama Historic Rehabilitation Tax Credit or Federal Historic Tax Creditconsiders "sufficient evidence" that a project.	The AHFA Multifamily Funding Application Package Instructions provides a detailed list of the information/documentation that must be submitted as evidence that a Project qualifies for the Alabama Historic Rehabilitation Tax Credit or Federal Historic Tax Credit. Please refer to the application instructions.
A. Points Gained **(v.) Project Type (c.)**	A-7	Sharon Tolbert/Auburn Housing Authority	(v) PROJECT TYPE (c) AHFA should consider including replacement of existing multifamily housing owned by public housing authorities.	No changes will be made. For clarification purposes, this section of the Plan currently includes replacement of existing housing owned by public housing authorities.

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				The exception listed for public housing authorities is to allow replacement housing on the same site or a new site.
(A. Points Gained **(v.) Project Type (c.)**	A-7	Monique Pierre / Montgomery Housing Authority	Project Type (c.) The current QAP language defines previously existing multifamily housing as "multifamily housing that has been demolished and cleared within the last 5 years, or will be demolished and cleared for the construction of new replacement housing on the same site…" The Montgomery Housing Authority requests AHFA consider revising the language "within the last 5 years" to "within the last 10 years" for the definition of a previously existing multifamily housing development. Many existing multifamily residential rental housing developments require multiple phases over several years past date of demolition to allow the full redevelopment of the site. The final phases of the redevelopment process are typically difficult to achieve within the 5 year window so consideration to extend the definition to 10 years would be much appreciated.	No changes will be made.
A. Points Gained **(v.) Project Type**	A-7	Kristina Stone /United Bank	In Section 1(v) Project Type, add a point category for including a minimum of 20% of the development's units at market rate. This would not only incentivize mixed-income properties, but it would also allow limited housing credits to be utilized in a larger number of developments. Consider adding this as a 2 point category.	No changes will be made.
A. Points Gained (vi.) Location (a.) Points Gained for Site Location	A-7	Randall Morgan Smith/BREC Development	Location - Neighborhood Services - we ask that AHFA look into changing the service of Bank/Credit Union to Bank/Credit Union/ATM. Many individuals do transactions electronically and ATM's nowadays' do everything an actual bank will do.	No changes will be made.

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(1.) Neighborhood Services			Furthermore, banks are closing branches left and right in rural areas this definition will have to change or risk handicapping rural Alabama due to an outdated neighborhood service no longer needed in today's modern world.	
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Joseph Raines/United Bank	(vi) LOCATION, (a) POINTS GAINED FOR SITE SELECTION, (1) NEIGHBORHOOD SERVICES: Recommend that Banks and Credit Unions be removed as a service that provides application point, and replaced with ATMs. As electronic banking has continued to rapidly grow, more and more people do not use traditional bank branch services on a regular basis. Online banking and ATMs are the preferred source of bank access by more and more people. Most individuals receive paychecks, social security, etc. via direct deposit or even pre paid debit cards. With the expansion of electronic services, the closure of bank and credit union branches has been increasing, particularly in rural areas. Elimination of banks and credit unions from receiving 2 points would ensure that otherwise optimal locations are not unduly penalized by the changing methods of completing financial transactions.	
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Cynthia Prater/The Bennett Group ************** Ann Marie Rowlett, Rowlett & Company, LLC	Expiring/Expired AHFA HOME loan projects that have received a 15-year extension and are applying for a new allocation of LIHTCs should have a separate point scoring criteria for neighborhood services. Depending on the age of the project, services currently receiving points weren't a consideration for funding when they were initially proposed/funded. Unfortunately, in the more rural areas of our state, AHFA financed projects were built in communities that still may not have a full service grocery store, hospital, or doctor's office. In those instances, we'd like to see AHFA give some consideration to the services that are available, i.e., Dollar General, Family Dollar, etc. Perhaps providing less	No changes will be made.

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			points for these types of services, but not discounting them completely.	
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Cynthia Prater/The Bennett Group ************** Arrice Faught / on Behalf of the Board of Alabama Affordable Housing Association ************** Ann Marie Rowlett / Rowlett & Company, LLC ************** Dave Truitt / CAPNA	AHFA should include detailed descriptions of each of the neighborhood services for which they will award points. Currently, these descriptions are only noted on the Site/Project Information Form (Neighborhood Services). When seeking sites for development, individuals may not always have access to the forms package. Having all details and instructions located in one document would certainly be helpful.	No changes will be made.
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Cynthia Prater/The Bennett Group ************** Ann Marie Rowlett / Rowlett & Company, LLC	AHFA should include a notation in the QAP that provides a list of neighborhood services that aren't awarded points but are required as part of the online application, i.e., Church, Civic Center, Daycare, Dry Cleaner, Library, Park, School, etc. This would be helpful information for individuals seeking sites for development. If AHFA doesn't require these services to be identified by name and distance from a proposed site, they should be removed from the online application.	The neighborhood services that are <u>not</u> eligible for points will be removed from the online application. The additional neighborhood services, such as community centers, libraries, parks, etc., are currently being provided with the environmental study.
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Kristina Stone / United Bank	In Section 1(vi)(a)(1), expand the Neighborhood Services category to reflect additional amenities and to incentivize being closer to selected amenities. Close proximity to a variety of nearby services ensures that residents have easy access to services that are instrumental to their health and well-being and can reduce reliance on automobile trips. Consider the following changes and additions to the point category: (a)	

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			raise the maximum points in the category to 15 points, (b) include Library, YMCA, Public School (if a family development), Senior Center (if a senior development), College or University, and Public Park as additional Neighborhood Services where points could be earned, (c) award 3 points for each amenity that is within 1 mile of the project site, and (d) continue to award 2 points for each amenity that is within 3 miles of the project site.	
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Amy Montgomery/Hall Housing Group	Give projects the maximum points for Location of Services for a HOME rehab deal or a previously funded tax credit rehab deal (had tax credits previously) as long as they receive maximum 8 points for Project Characteristics (type of construction for rehab projects only)	No changes will be made.
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Kristina Stone / United Bank	In Section 1(vi) Location, add a point category related to public transportation. Close proximity to public transit helps residents maintain easy access to important services as well as to job centers. Residents of walkable neighborhoods, or those who walk to and from public transit are also more likely to meet recommended physical activity levels which can help reduce obesity and associated health risks. Consider adding the following point categories: (a) 4 points if the development's entrance is within 0.25 mile of a bus stop serving local destinations beginning no later than 8:00 am and ending no earlier than 6:00 pm, Monday through Friday, (b) 2 points if the development's entrance is within 0.5 mile of a bus stop serving local destinations beginning no later than 8:00 am and ending no earlier than 6:00 pm, Monday through Friday, and (c) 2 points if there is a dial-a-ride service available in the county which residents could utilize Monday through Friday.	No changes will be made.

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A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Kristina Stone / United Bank	In Section 1(v) Project Type, add a point category related to redevelopment that addresses vacant, blighted property or underutilized parcels. Prioritizing neighborhood revitalization and infill development supports the efforts of many urban and rural muncipalities who are looking to transform blighted areas and encourage reinvestment in areas which are often located in close proximity to neighborhood and social services, are walkable and bikeable, and can utilize existing infrastructure. Applicants would have to demonstrate that a muncipality has either issued a blight declaration for a property or that the proposed development supports the muncipality's redevelopment goals or plans. Consider adding this as a 4 point category.	No changes will be made.
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(1.) Neighborhood Services**	A-7	Sharon Tolbert/Auburn Housing Authority	(vi) LOCATION, (a) SITE SELECTION (1) NEIGHBORHOOD SERVICES: AHFA should consider including clinics as a neighborhood service.	No changes will be made.
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(2.) Census Tract Location**	A-8	Randall Morgan Smith/BREC Development	Census Tract Location – we ask AHFA to look into changing the tract definition to include sites that are within .25 miles of census tract that gets points. As AHFA is aware census tracts are ambiguous and potentially gerrymandered. Currently a site across the street from a 100% AMI – 3 points census tract could get zero points, because it might be in a 60% AMI census tract, even though it's in the same neighborhood.	No changes will be made.
A. Points Gained (vi.) Location (a.) Points Gained for Site Location **(2.) Census Tract Location**	A-8	Monique Pierre / Montgomery Housing Authority	Location. (2) Census Tract Location. The current QAP language allocates a maximum of 3 points for projects located in a Census tract where the Median Family Income from the 2010 Census data is equal to or higher than certain percentages.	

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			While the Montgomery Housing Authority (MHA) acknowledges AHFA's desire to award applicants for developing in higher income census tracts, MHA considers 2 points to be sufficient point score to incentivize that development. Therefore, MHA requests that AHFA consider reducing the total available points from 3 points to 2 points for higher income census tracts.	
A. Points Gained (vi.) Location **(a.) Points Gained for Site Location**	A-8	Dr. Josh Carpenter/City of Birmingham	ln the "location" section, we recommend adding to the end of **(vi}(a)(2)** three (3) points for a project located in an Opportunity Zone as the term is defined 26 U.S.C. § 4SD(e);	No changes will be made.
A. Points Gained (vi.) Location **(a.) Points Gained for Site Location**	A-8	Dr. Josh Carpenter/City of Birmingham	Also, in the "Location" section, we recommend adding to the end of (iv)(a)(2) an additional three (3) points be given for a project located in an Opportunity Zone that is at heightened risk of displacement.	
A. Points Gained (vi.) Location **(b.) Points Deducted for Site Selection**	A-8	Randall Morgan Smith/BREC Development	Negative Neighborhood Services – we ask AHFA to provide concrete definitions for each negative neighborhood service listed to ensure all parties are on the same page.	
(b.) Points Deducted for Site Selection	A-8	Amy Montgomery/Hall Housing Group	Don't deduct points for Negative Location (surrounding uses) for a HOME rehab deal or a previously funded tax credit rehab deal (had tax credits previously) as long as they receive maximum 8 points for Project Characteristic (type of construction for rehab projects only)	No changes will be made.
(b.) Points Deducted for Site Selection	A-8	Matt Edwards/SEC	Rehabs of previously funded AHFA projects should not be subject to lost points for negative characteristics that were present when the project was originally funded by AHFA.	
(b.) Points Deducted for Site Selection	A-8	Joseph Raines/United Bank	(vi) LOCATION, (b) POINTS DEDUCTED FOR SITE SELECTION, (1) NEGATIVE NEIGHBORHOOD SERVICES: Recommend that PHAs with HUD approved RAD projects not be subject to these points deductions. The	

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			RAD program is allowing PHAs to greatly improve the quality of public housing by demolishing old, obsolete, unsafe, and unsanitary housing. In many cases, limited availability and cost of alternative sites makes it unfeasible for a PHA to rebuild anywhere except the original location of the housing being replaced. Unfortunately, sometimes this means there negative neighborhood services nearby which could effectively disqualify the site from ever receiving a Housing Credit award. Ultimately, however, the benefit of new, safe, clean affordable housing vastly outweighs the negative neighborhood services.	
2. Applicant Characteristics	A-9	Matt Edwards/SEC	In the applicant characteristics section up to 5 points are award for owners of AHFA and non-AHFA projetcs. AHFA projects should carry more weight than non AHFA projects and be worth 2 - 2.5 points for each project owned since 2006. Experience in state should count for more than out of state experience.	This section will be revised as follows: 5 points will be given to Ownership Entities with a Responsible Owner that currently owns and has previous successful experience in the development of Active AHFA Projects that received a Housing Credit Reservation Letter or HOME Written Agreement in 2000 or later.
2. Applicant Characteristics	A-9	Chris Retan/Aletheia House	AHFA has done a good job in the past several years encouraging organizations to obtain and maintain their CHDO status. Continue the incentive to maintain CHDO status by adding one point for being an AHFA recognized CHDO.	No changes will be made.
B - Environmental Policy Requirements				
For All Applications made to AHFA:	B-1	Russell Griebel/United Consulting	To meet Alabama Department of Environmental Managements definition of unrestricted residential use, per ADEM soils require remediation to Environmental Protection Agency	AHFA will revise the relevant language in Addendum B to read as follows: "All environmental issues

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		************** Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	published Regional Screening Levels (RSLs). These are ultra conservative standards, and were not developed by EPA as cleanup standards, but rather screening standards. ADEM has a risk based approach for developing safe residential cleanup standards. ADEM also for engineering and institutional controls on residential properties. HUD accepts this approach. The current QAP language seems to have a potential unintended consequence, where some communities with the greatest need for affordable housing have properties not being eligible for AHFA funding. Changes need to be made to allow for risk based corrective actions and both engineering and institutional controls, or these communities are going to be left behind.	identified (or that AHFA determines should have been identified) in the Phase I ESA and Phase II ESA reports must have been fully abated or mitigated (or include with the application a written remediation plan approved in writing by ADEM) in a manner that is compatible with unrestricted residential use (as defined by ADEM under Alabama Administrative Code regulation 335-15-1.02(ccc), with the following sole exceptions (a) AHFA will permit the use of an institutional control prohibiting the use of groundwater for potable or irrigation purposes in instances where the water is supplied by a utility) and is acceptable to AHFA in all respects before submittal of the application; and (b) for Housing Credit projects only, AHFA will permit the use of a permanent passive vapor mitigation system as part of a Voluntary Cleanup Plan approved in writing by ADEM under Alabama Administrative Code regulation 335-15-4-.04 prior to submission of the application where the source or sources of potential vapor intrusion is or are located entirely off-site and the ADEM approval of the Voluntary Cleanup Plan states that
For All Applications made to AHFA:	B-1	Win Yerby/Hollyhand Dev LLC	Allow Institutional/Engineered Solutions for Environmental Conditions Encountered on Bond Deals: Addendum B/Environmental Policy require sites to meet ADEM's Unrestricted Residential Use standards but prohibits use of institutional controls to meet this standard. The combination of these two rules results in an environmental policy that makes redevelopment financially infeasible in many cases. HUD and other federal agencies do not utilize such a draconian standard thus permitting federal funding to be used in revitalization projects. The AHFA Environmental policy however unintentionally bans entire neighborhoods from being eligible to receive vital AHFA assistance for important housing developments that would otherwise serve as catalysts for redevelopment of these neighborhoods. Many of these neighborhoods were subject to unjust environmental impacts decades ago and are now struggling to recover. New projects would be feasible under HUD and federal standards if appropriate institutional and engineered solutions would be	

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			permitted by AHFA. On an experimental basis, AHFA could permit such institutional solutions on 4% bond transactions by making an exception for such transactions to the ban on institutional controls.	no future compliance monitoring will be required.
For All Applications made to AHFA:	B-1	Willie B. McMahand, Jr. / Anniston Housing Authority	Addendum B of the Environmental Policy require sites to meet ADEM's Unrestricted Residential Use standards but prohibits use of institutional controls to meet this standard. The combination of these two rules results in an environmental policy that makes redevelopment financially infeasible in many cases. HUD and other federal agencies do not utilize such a draconian standard thus permitting federal funding to be used in revitalization projects. The AHFA Environmental policy however unintentionally bans entire neighborhoods from being eligible to receive vital AHFA assistance for important housing developments that would otherwise serve as catalysts for redevelopment of these neighborhoods. Many of these neighborhoods were subject to unjust environmental impacts decades ago and are now struggling to recover. New projects would be feasible under HUD and federal standards if appropriate institutional and engineered solutions would be permitted by AHFA. On an experimental basis, AHFA could permit such institutional solutions on 4% bond transactions by making an exception for such transactions to the ban on institutional controls.	
Application Completeness Requirements	B-2	Chris Retan/Aletheia House	Environmental studies should not the treated the same as other missing items. Developers must rely on the professional opinion of their environmental consultant and should not be penalized if the professional opinion of the AHFA's attorney or consultant differs from the opinions of the environmental consultant hired for the project. Where there is a difference of opinion, or a request for additional information, all parties should have an opportunity to	No changes will be made. AHFA notes that the determination about whether environmental reports are accepted or rejected is not a matter of opinion but is made strictly on the basis on whether the reports are in compliance with Addendum B

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			address issues raised within a reasonable period of time and without financial penalties. Also, where the developer and the AHFA consultants have an unresolved difference of opinion on environmental issues, the developer should have the right to have the issue reviewed by a third-party environmental consultant or attorney that is not associated with either AHFA or the developer who can give a second opinion. This review would be done at the developer's cost.	and the regulations and guidance cited therein at the time of application.
Addendum B-1 AHFA Requirements **9. a. Radon:**	B-7	Amy Montgomery/Hall Housing Group	On page B-7 of both QAPs, item 9.a., says that all new construction projects in all zones requires radon resistant new construction practices in all buildings. (It used to only just be just Zone 1) It also now requires the HUD method of mitigation instead of the previous EPA method. The HUD method is more expensive. Also, Rehabs now require testing in zone 1 and 2, not just zone 1. We feel this is onerous and should be changed back to the way it was in 2019.	No changes will be made to this section. However, AHFA will revise page C-1 so that it is consistent with page B-7.
Addendum B-1 AHFA Requirements **9. a. Radon:**	B-7	Sandy Goff/Goff, LLC	On page B-7 of both QAPs, item 9.a., says that all new construction projects in all zones requires radon resistant new construction practices in all buildings. (It used to only just be just Zone 1) It also now requires the HUD method of mitigation instead of the previous EPA method. The HUD method is more expensive. Also, Rehabs now require testing in zone 1 and 2, not just zone 1. The design manual of both QAPs, page C-1, still says only Zone 1 has to have mitigation. That doesn't match page B-7.	
Addendum B-1 AHFA Requirements **9. a. Radon:**	B-7	Rory L. McKean / McKean & Associates Architects, LLC	9.a. states that New Construction projects in all zones will require radon resistant new construction practices in all buildings, etc.	

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			Addendum C, II.A.2.) states that sites located in Radon Zone-1 (highest level) will require Radon Resistant New Construction Practices in all buildings. These two paragraphs don't match. Paragraph 9.a. should be revised to match radon resistant new construction practices for Radon Zone-1 (highest level).	
Addendum B-1 AHFA Requirements **9. b. Wetlands**	B-7	Win Yerby / Hollyhand Dev LLC	Exception to Wetlands Policy for Rehabilitation projects: The QAP bars any projects with wetlands on site. However, in requesting jurisdiction determinations for rehabilation projects, the Corps of Engineers often takes an expansive view of its jurisdiction and will include "manmade" drainage structures such as concrete drainage ditches as within its jurisdiction. This can happen when there are no other wetlands on the site and these structures are only present as a result of the construction of the complex. The AHFA policy should provide that no wetlands are allowed on site "except for Rehabilitation projects where the EP determines that the wetlands determination is for an engineered feature of the property and that the feature will not be disturbed during rehabilitation."	AHFA will revise the relevant language in Addendum B to read as follows: "Any wetland delineation studies or assessment reports prepared for the project site or adjoining properties by the EP must be submitted with the application and the field work completed within 180 days prior to application submittal; or, in the alternative, a previously obtained, valid JD for the entire project site or adjoining properties (along with supporting documentation reviewed by the U.S. Army Corps of Engineers in connection with the JD) may be submitted with the application. AHFA will revise the relevant language in Addendum B to read as follows: "If on any portion of the site (including integral offsite development areas) any evidence of wetlands, streams, lakes or other water bodies are suspected to be present (based on the EP's field observations, aerial photographs, water bodies shown on the USGS topographic map,
Addendum B-1 AHFA Requirements **9. b. Wetlands**	B-7	Fred Bennett / Bennett & Company, LLC	Proposed exception to the AHFA wetlands policy for all developments: if the site inlcudes wetlands, the area of wetlands as a percentage of the entire site must be 10% or less, must not be impacted by the development of the site, and must be protected by a recorded restrictive land use agreement.	
Addendum B-1 AHFA Requirements **9. b. Wetlands**	B-7	Kevin Strumpler / Geotechnical & Environmental Consultants	Under the wetlands section of the Environmental Policy Requirements, the manuel indicates that no portion of the site can contain wetlands, streams, lakes, or other water bodies. Then if further indicates that if there are wetlands, streams, lakes, or other water bodies on the site, a Jurisdictional Determination from the U.S. Army Corps of Engineers will be required to confirm the presence or absence of these items.	

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			The US Army Corps of Engineers (USACE) JD is now referred to as the Aquatic Resources Determination Review (ARDR). There is no set review time for the USACE to have an ARDR back to the client since these do not take precedence over a permit application; therefore, 180 days may not be sufficient time to get an ARDR back. Due to the lack of sites in the Alabama area that do not have any jurisdictional areas, we ask that the AHFA consider allowing jurisdictional areas to be located on the property, but not impact them. We have found that sometimes it is a more efficient use of funds to delineate the jurisdictional areas based on the USACE criteria and have those shown on the final site plan for application submission. Then as a condition of funding, the applicant would apply for an ARDR to insure that the USACE agrees with the delineation. Typically wetlands, streams, lakes, or other water bodies can add a green space component to the project that makes it a more desirable site than one without any of these areas. We ask that you seriously consider this change for your 2020 QAP Environmental Policy Requirements.	wetlands or other aquatic resources on the NWI map, or hydric soils or soils with hydric components on the soils map for the site), and a wetlands delineation report for the site is prepared by a qualified professional to demonstrate the absence of wetlands, streams, lakes, or other water bodies on the site, a Jurisdictional Determination (JD) from the U.S. Army Corps of Engineers will also be required to confirm the absence of wetlands, streams, lakes, or other water bodies.
Addendum B-1 AHFA Requirements **9. b. Wetlands**	B-7	David Morrow / The Morrow Companies	Allow wetlands to be part of a development if not disturbed or if delineated per HUD and/or Army Corps of Engineers requirements.	
Addendum B-1 AHFA Requirements **9. b. Wetlands**	B-8	Fred Bennett / Bennett & Company, LLC	Proposeacquisiton/rehab properties: if the if the existing property includes features designed to contain or control surface water (a detention or retention pond), the Envlironmental Professional should make the judgement as to whether they will continue to be used as such and no JD from the Corps. of Engineers should be needed or sought.	

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Addendum B-1 AHFA Requirements **9. b. Wetlands:**	B-8	Chris Retan/Aletheia House	We have been told that wetland delineation studies from the Corps of Engineers are typically valid for a five year period. If this is correct, and the property has a study that is older than 180 days but still within the validity time included in the Corps of Engineers letter, no update should be required.	
Addendum B-1 AHFA Requirements **b. Wetlands**	B-8	Russel Griebel/United Consulting ************** Jordan Whiteside / Vantage Development ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	The QAP states "Any wetland delineation studies or assessment reports prepared for the project site or adjoining properties must be submitted with the application and the field work completed within 180 days prior to application submittal." If a JD was previously conducted on a property, the JD is typically valid for 5-years, which is specified in the Corps of Engineers letter. In such an instance, an updated wetland delineation and JD would not be warranted. Please acknowledge such.	
Addendum B-1 AHFA Requirements **b. Wetlands**	B-7	Russel Griebel/United Consulting ************** Jordan Whiteside/ Vantage Development, LLC ************** Arrice Faught / on behalf of the board	The QAP states "No portion of the site may contain wetlands, streams, lakes, …". This requirement severely limits opportunities for site selection, without providing real protection for wetlands and other aquatic resources. Further, this requirement is much more stringent than HUD rules. We would like to propose the following language: "AHFA discourages the selection of sites that contain wetlands, streams, lakes, or other water bodies (which also includes waters of the United States). If wetlands or other waters are identified or suspected on a site (suspected	

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		of Alabama Affordable Housing Association ************** Judy Van Dyke, Kim Golden, Avery Smith / Vision Driven Communities	wetlands/waters as defined below), then a wetland delineation must be performed by a qualified consultant. A copy of the wetland delineation report must be included in the application. Further, a preliminary jurisdictional determination request must be submitted to the U.S. Army Corps of Engineers (USACE) prior to application. A copy of the JD submittal must also be included in the application. The limits of wetlands and other waters must be clearly shown on the proposed site plan. No impacts to wetlands or other waters is allowed except as required for site access or for utility connection (such as sewer connection). If such impacts are proposed, an application (typically a preconstruction notification or PCN) for the appropriate permit must be prepared and submitted to the USACE. A copy of the permit request must be included with the application. Any written approval/denial received from the USACE must be provided to AHFA. Such documentation must be provided to AHFA prior to award. If wetlands or other waters are located on the site, those areas must be protected with a restrictive covenant or conservation easement (RC/CE). A draft copy of the RC/CE must be provided to AHFA prior to award and must be filed in the project county within 90 days following award. A copy of the final recorded document must be provided to AHFA."	
Addendum B-1 AHFA Requirements **b. Wetlands**	B-7	Russel Griebel/United Consulting ************** Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board	The QAP includes language regarding "any evidence of wetlands, streams… are suspected to be present…" We recommend adding some clarifying language to the QAP to define 'suspected wetlands/waters'. In conjunction with the language recommended above, we recommend the following: Suspected wetlands/waters are defined as wetlands or other aquatic resources shown on the National Wetland Inventory Map, mapped Hydric Soils or Soils with a major hydric soil component, streams, lakes or swamps shown on the USGS Topographic Map, or visual indications of wetlands on the	

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		of Alabama Affordable Housing Association ************** Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	property, such as the presence of hydric soils and/or wetland hydrology indicators.	
Addendum B-1 AHFA Requirements **b. Wetlands**	B-7	Arrice Faught / on behalf of the Board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Allow wetlands to be part of a development if delineated per HUD requirements.	
Addendum B-1 AHFA Requirements **d. Noise Abatement & Control:**	B-8	Russel Griebel/United Consulting ************** Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Judy Van Dyke, Kim Golden, Avery	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."	No changes will be made.

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2020 Summary of Public Comments Received and Responses by AHFA

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		Smith / Vizion Driven Communities		
Addendum B-1 AHFA Requirements **d. Noise Abatement & Control:**	B-8	Amy Montgomery / Hall Housing Group	The outside noise greater than 65 db should be only applicable to specific outdoor areas such as playgrounds, pool areas and other locations that would be utilized for > one hour. As an example, this noise maximum should not be applicable to dumpsters, parking lots, unimproved land on the site, etc.	
Addendum B-1 AHFA Requirements **d. Noise Abatement & Control:**	B-8	Chris Retan / Aletheia House	It is our understanding AHFA measures noise requirements, railroad tracks, major highways, etc. from the property line and this is not consistent with the HUD regulations. If this is correct, we recommend AHFA adopt the HUD guidelines for exterior noise requirements.	
Addendum B-1 AHFA Requirements **d. Noise Abatement & Control:**	B-8	David Morrow / The Morrow Companies	d. Noise Abatement & Control 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." Calculating noise from the property line should be mitigated at 250 ft. to building rather than property line because you may have a narrow piece of property that touches a railroad track but the buildings may be 500 ft. away and may or may not need to be mitigated per the HUD regulations. This causes a	

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			property to be mitigated that does not need to be mitigated and runs the construction cost high or makes the site not feasible.	
Addendum B-1 AHFA Requirements **d. Noise Abatement & Control:**	B-8	Win Yerby / Hollyhand Dev LLC	Utilize HUD Noise Mitigation Standards: AHFA adopts HUD noise guidelines but interprets exterior noise requirements to be at the property line. This is not consistent with HUD's approach and results in a internally inconsistent policy because it imposes a noise score on site locations that should not be subject to a 24 hour cumulative calculation. It also creates confusion for Environmental Professionals experienced with applying the overall HUD standard and can prohibit development on sites that have access drives off streets with a slightly. AHFA should clarify that mitigation requirements should be consistent with 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.	
Addendum B-1, **10. Aboveground Storage Tanks:**	B-9	Russel Griebel / United Consulting ************** Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Judy Van Dyke, Kim Golden, Avery Smith / Vizion	The QAP indicates all aboveground storage tanks (ASTs) containing 100 or more gallons of explosive or flammable liquid or gas within 1 mile of the project site must be identified. The prevalent/common ASTs are residential propane tanks. These tanks are typically less than 500-gallons. These ASTs have an acceptable separation distance of approximately 210 feet. Consider tiering the search requirements based on the sizes and types of ASTs.	No changes will be made.

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		Driven Communities		
Addendum B-1	B-10	Russel Griebel/United Consulting ************** Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	The QAP indicates "AHFA will not accept any proposed future institutional or engineering controls on the proposed site other than a prohibition on the use of groundwater for potable or irrigation purposes…." Such language does not allow for properties to be eligible where mitigation of the potential vapor intrusion pathway is warranted. Vapor mitigation measures are often considered to be engineering controls. The vapor pathway is often addressed via a system similar to a radon mitigation system. Radon mitigation is required in the QAP, which is an engineering control. Requiring one type of engineered control, but disallowing another is counterintuitive. Please consider updating this section to read "AHFA will not accept any proposed future institutional or engineering controls on the proposed site other than a prohibition on the use of groundwater for potable or irrigation purposes in instances where the water is supplied by a utility and/or the installation of a vapor mitigation system to address the potential vapor intrusion pathway."	AHFA will revise the relevant language in Addendum B to read as follows: "All environmental issues identified (or that AHFA determines should have been identified) in the Phase I ESA and Phase II ESA reports must have been fully abated or mitigated (or include with the application a written remediation plan approved in writing by ADEM) in a manner that is compatible with unrestricted residential use (as defined by ADEM under Alabama Administrative Code regulation 335-15-1.02(ccc), with the following sole exceptions (a) AHFA will permit the use of an institutional control prohibiting the use of groundwater for potable or irrigation purposes in instances where the water is supplied by a utility) and is acceptable to AHFA in all respects before submittal of the application; and (b) for Housing Credit projects only, AHFA will permit the use of a permanent passive vapor mitigation system as part of a Voluntary Cleanup Plan approved in writing by ADEM under Alabama Administrative Code regulation 335-15-4-.04 prior to submission of the

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				application where the source or sources of potential vapor intrusion is or are located entirely off-site and the ADEM approval of the Voluntary Cleanup Plan states that no future compliance monitoring will be required.
Addendum B		Kevin Strumpler / Geotechnical & Environmental Consultants	Please consider including the 2020 AHFA Environmental Review Checklist as part of the QAP. As AHFA uses this document to evaluate environmental assessments, it would be beneficial for consultants to have the criteria included in this document, which is not included in the QAP. An example is ASTs/ASDs. The QAP does not define which section these items should be discussed, but the Environmental Review Checklist says they should be in Section 5.1.1, resulting in a deficiency, even though this information was not provided in the QAP. Otherwise, please provide the required criteria in the QAP.	The Environmental Review checklist will be made available on AHFA's website.
		Jordan Whiteside / Vantage Development, LLC Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Decrease the time period for AHFA environmental approvals needed. Allow soil borings to be a choice limiting activity per HUD requirements per environmental professionals. The delays affect the financially feasibility of developments that cannot hold construction prices.	AHFA will revise the relevant language in Addendum B regarding Applicants for Housing Credits to read as follows: "For projects applying for Housing Credits or a tax-exempt volume cap allocation (but do not receive HOME Funds), prohibited post-application activities include, but are not limited to acquiring, changes in property ownership, rehabilitating or converting all or any portion of the proposed site or project as well as disturbing the ground (other than
		Jason Freeman / Gateway	Decrease the time period for AHFA HOME environmental approvals after award of HOME Funds. Allow soil borings to be a choice limiting activity per HUD requirements per	

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		Development Corporation	environmental professionals. The delays affect the financially feasibility of developments that cannot hold construction prices.	geotechnical soil borings upon advance notice to AHFA) or commencing any form of construction at the proposed site or project." No changes will be made to the language regarding choice limiting activities for applications for HOME funding.
		David Morrow / The Morrow Companies	Decrease the time period for AHFA environmental approvals needed and also reduce the amount of items requested in the AHFA Environmental Assessment Checklist form. The delays affect the financially feasibility of developments that cannot hold construction prices.	
		David Morrow / The Morrow Companies	Allow soil borings to be a choice limiting activity per HUD requirements per environmental professionals.	
		David Morrow / The Morrow Companies	Decrease the amount of items requested in the AHFA Environmental Assessment Checklist form. The delays affect the financially feasibility of developments that cannot hold construction prices.	No changes will be made.
C – Design Quality Standards & Construction Manual				
II. Requirements for All Approved Projects, C. Project Standards, **3.) Required Unit Amenities**	C-2	Michael Hellier / Gulf Coast Housing Partnership	We request that the Ice Maker requirement be eliminated. To install a refrigerator with an ice maker, a separate water line is required. These water lines are inevitably installed behind cabinetry, and are feasible punctured leading to leaks. These leaks are difficult to identify, which can lead to costly repairs for the affordable housing owner, significant inconvenience to the tenant, and increased utility bills for the tenant.	No changes will be made.
III. Attached New Construction Rental Units, A. Minimum Building Standards: 3.	C-5 For HOME see C-6	Michael Hellier / Gulf Coast Housing Partnership	We request that certain new construction project types be exempt from portions of this DQS requirement. A new construction building with interior corridors would not have interior corridor lighting controlled by the interior of a tenant unit for a variety of reasons. This requirement is logical for	No changes will be made.

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Exterior Building Standards: **b. Other Exterior Standards: i.**			exterior breezeways/walkways, but not for building types with interior corridors.	
III. Attached New Construction Rental Units, A. Minimum Building Standards: 3. Exterior Building Standards: b. Other Exterior Standards, **xiii.**	C-6	Michael Hellier / Gulf Coast Housing Partnership	Please provide further clarification for the following DQS requirement: "All exterior project amenities that have exposed components used as part of the structure must be constructed so that no wood is exposed." It's our understanding that a pre-engineered pavilion with a powder-coated, steel tube frame with pre-stained exposed pine roof decking would not allowed, per the requirement above. This type of structure is an attractive and structurally sound pavilion that requires very little maintenance. It can easily meet wind loading conditions even in hurricane prone areas.	No changes will be made.
III. Attached New Construction Rental Units A. Minimum Building Standards:, 4.) Interior Building and Space Standards:, **d. Bathroom spaces**	C-8	Rory L. McKean / McKean & Associates, Architects	Bathroom Spaces. The language in the revised paragraph below is more in keeping with the requirements of the Fair Housing Act Design Standards for the Fair Housing Units and the ADA/ANSI requirements that apply to the Handicap Units. “All Tub/Showers must have minimum dimensions of 30-inch width by 60-inch length and be equipped with anti-scald valves. All Handicap Showers whether roll-in or transfer type must meet ADA/ANSI Standards and be equipped with anti-scald valves and grab bars. Integral wood blocking must be installed in the walls at Fair Housing units as per the Fair Housing Act Design Manual for the installation of grab bars at tub/showers and showers. If the tub/shower and showers are constructed of reinforced fiberglass or acrylic surrounds and specifically labeled to meet	No changes will be made.

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			the ANSI structural strength load requirements of 250 pounds for vertical and horizontal forces for grab bars, the wood blocking in the walls is not required. All tub/showers and showers in designated handicap accessible units must come complete with "factory-installed grab bars" where the tub/shower and shower surrounds are constructed of reinforced fiberglass or acrylic. Reinforced walls must be specifically labeled to meet the structural strength load requirements stipulated by ADA/ANSI of 250 pounds for vertical and horizontal forces. Reinforced surrounds meeting this requirement need no additional blocking in the walls. If the tub/shower and shower surrounds are not constructed of reinforced fiberglass or acrylic, but rather of hard tile or composite materials; solid wood blocking must be installed in the walls to meet Fair Housing and ADA/ANSI requirements."	
III. Attached New Construction Rental Units **5. Plumbing and Mechanical Equipment**	C-8/C-9	Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	Currently for new construction and rehab projects, water heaters are required to be drained to the outside or to the sanitary sewer system. This is sometimes very difficult and expensive for existing buildings. Allow for a deviation request on this standard on ground floor units.	In the example provided, deviation requests should be submitted to AHFA.
III. Attached New Construction Rental Units **5. Plumbing and Mechanical Equipment**	C-8/C-9	Ann Marie Rowlett / Rowlett & Company, LLC	Expiring HOME projects face a number of challenges requiring water heaters to drain outside is one of them. It is expensive and challenging to have ground floor units drain to the outside. AHFA should consider not requiring ground floor water heaters to drain to the outstide or sanitary sewer system if it is financially infeasible.	
III. Attached New Construction	C-9	Rory L. McKean / McKean &	III.5.) i. and ii. This paragraph indicates new Energy Standards for water heaters which is correct.	No response needed.

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Rental Units, A. Minimum Building Standards, **5.) Plumbing and Mechanical Equipment i. & ii.**		Associates, Architects		
IV. New Construction Single Family Rental Homes, A. Minimum Building Standards: **4. Bathroom Spaces**	C-12	Rory L. McKean / McKean & Associates, Architects	Bathroom Spaces. The language in the revised paragraph below is more in keeping with the requirements of the Fair Housing Act Design Standards for the Fair Housing Units and the ADA/ANSI requirements that apply to the Handicap Units. "All Tub/Showers must have minimum dimensions of 30-inch width by 60-inch length and be equipped with anti-scald valves. All Handicap Showers whether roll-in or transfer type must meet ADA/ANSI Standards and be equipped with anti-scald valves and grab bars. Integral wood blocking must be installed in the walls at Fair Housing units as per the Fair Housing Act Design Manual for the installation of grab bars at tub/showers and showers. If the tub/shower and showers are constructed of reinforced fiberglass or acrylic surrounds and specifically labeled to meet the ANSI structural strength load requirements of 250 pounds for vertical and horizontal forces for grab bars, the wood blocking in the walls is not required. All tub/showers and showers in designated handicap accessible units must come complete with "factory-installed grab bars" where the tub/shower and shower surrounds are constructed of reinforced fiberglass or acrylic. Reinforced walls must be specifically labeled to meet the structural strength load	No changes will be made.

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			requirements stipulated by ADA/ANSI of 250 pounds for vertical and horizontal forces. Reinforced surrounds meeting this requirement need no additional blocking in the walls. If the tub/shower and shower surrounds are not constructed of reinforced fiberglass or acrylic, but rather of hard tile or composite materials; solid wood blocking must be installed in the walls to meet Fair Housing and ADA/ANSI requirements."	
7.) Plumbing and Mechanical Equipment	C-13 and C-18	Michael Hellier / Gulf Coast Housing Partnership	As of June 2017, the Department of Energy (DOE) has changed the test procedures and metric used to communicate the energy efficiency of residential water heaters. The Uniform Energy Factor (UEF) is the Department of Energy's current metric for communicating water heater energy efficiency. Previously, efficiency has been measured by Energy Factor (EF). Uniform Energy Factor (UEF) rating system replaces the EF metric. The new regulation aims to make it easier to make "apples to apples" comparisons between two different water heaters. In short, the new test and metric has changed the way energy efficiency, capacity, and first hour ratings are compared. All residential water heaters sold in the U.S. must comply with this new approach and therefore the Energy Factor (EF) rating noted in the AHFA's Design Quality Standards and Construction Manual (Addendum C) is no longer applicable.	The AHFA Design Quality Standards and the Construction Manual already reflect the updated standard.
C. Interior Building and Space Standards **7.) Plumbing and Mechanical Equipment**	C-13	Rory L. McKean / McKean & Associates Architects, LLC	IV.C.7.a. This paragraph should match the new Energy Standards noted on page C-14 above in the HOME section.	
IV. New Construction	C-14	Rory L. McKean / McKean &	IV. C. 7.a. This paragraph should match the new Energy Standards noted on page C-9 above.	

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Single Family Rental Homes, C. Interior Building and Space Standards:, **7.) Plumbing and Mechanical Equipment, a**		Associates Architects, LLC		
V. For Attached Rehabilitation of an Existing Building, B. Exterior Building Standards:, 4**.) Plumbing and Mechanical Equipment:**	C-18	Rory L. McKean / McKean & Associates Architects, LLC	V.B.4.)a. This paragraph should match the new Energy Standards noted on page C-14 above in the HOME section.	
D – Compliance Monitoring Procedures, Requirements & Penalty Criteria				
II. Penalty Scoring and Suspension Criteria **1.) Health and Safety Deficiencies (d)**	D-6	Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on Behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Item 1(d):A two point deduction for a single electrical outlet cover plate is excessive. One suggestion would be to apply a threshold limit similar to other items in this section, e.g. "25% of units with a missing or damaged electrical outlet cover plate."	Changes will be made in this section as follows: Exposed electrical wiring or electrical hazards in tenant accessible areas for more than twenty-five percent (25%) of the total units inspected. Any findings related to this category which total twenty-five percent (25%) or less will be subject to the penalty criteria as defined in Section II I 5 herein.

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		************** David Morrow / The Morrow Companies		
II. Penalty Scoring and Suspension Criteria..4.) **Documentation of File Deficiencies (f)**	D-8	Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Consider adding an exception for when management companies are unable to import the events, due to issues within DMS software where AHFA has been informed and waiting on the software designer to correct the issues.	If DMS is not accessible an extension may be requested provided access is attempted in advance of the required deadline for import of tenant data.
II. Penalty Scoring and Suspension Criteria..4.) **Documentation of File Deficiencies (f)**	D-8	Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA ************** David Morrow / The Morrow Companies	Delete - If AHFA DMS Event Details are not updated by the 15th day of each month for the prior month's tenant event for more than twenty-five percent (25%) of the units in the Project. There are sometimes issues with the system and turnover of the site management staff that may delay getting the updates by the 15th of the month.	Changes will be made to this section as follows: Section II I 4.)(f) If AHFA DMS Event Details are not updated by the 15th of each month for the prior month's tenant events for more than twenty-five percent (25%) of the household files inspected either a $100 fee must be paid by the date specified by AHFA or a 1 point deduction will occur. Any findings related to this category that total twenty-five percent (25%) or less will be subject to the penalty

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				criteria as defined in Section II I 5 herein. In addition, changes will be made in the following section: Section I B By the 15th day of each month, each Ownership Entity must enter all tenant events into the AHFA DMS Authority Online (AHFA DMS) for the prior month. If, at the time of inspection, the tenant events in AHFA DMS do not match the information in the household file inspected by AHFA both the Ownership Entity and the Management Company (including owners and managers of the Management Company) will be subject to the penalty criteria as defined in Section II I 4 f herein. By February 1st each year, all tenant events from January 1st through December 31st of the previous year must be placed into AHFA DMS. A point deduction, as described in Section II E 1 of Addendum D, will be applied to the Ownership Entity and the Management Company of a Project for failing to enter all tenant events as required.

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II. Penalty Scoring and Suspension Criteria.	D-8	Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Currently there is a penalty criteria for smaller management companies. Consider adding a tiered penalty system for the larger management companies. The tiered structure could be for management companies with less than 3,000 units, another level with less than 5,000 and the next level at 5,000 or more. For example, a company managing 5,000 units or more with 4 findings is a much smaller percentage of units than a company with the same number of findings that manages less than 1,000 units. Along with tiering the penalty system, the point deductions in section II-F and II-H consider changing. Currently only allowing 2 findings/4 points for a company with a large portfolio is unreasonable. Consider changing the Health/Safety findings to 1 point and non-safety issues to 0.5 point. The current threshold is at 5 points. Consider increasing the threshold to 8 points. To only have 8 findings for 5,000 or more units is a "finding" percentage of only 0.16%, which is still extremely low. Considering rewarding a 0.5 point to Owners and management companies that have no findings on the property audit. We understand that you are using the UPCS guidelines for preforming inspections. On a HUD property when a REAC inspection occurs if the property scores 90 to 100 the property is rewarded by not having another inspection for 3 years.	No change will be made. The automatic point deduction findings are considered to be for significant noncompliance items. Since the compliance addendums have been added to the Housing Credit Qualified Allocation and HOME Action Plans most Ownership Entity and Management Company point loss and suspensions have been the result of an Ownership Entity and Management Company not correcting the noncompliance issues listed in the AHFA noncompliance letter by the deadline given**.**
		David Morrow / The Morrow Companies	No points should be taken off for items without a cure period or for items for which an existing work order is in process.	No changes will be made. The automatic point deduction items will remain. The automatic point deduction findings are considered to be significant noncompliance items. Reference Section II B. An Ownership Entity and/or

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				Management Company can notify AHFA of any items they are currently repairing. Reference Section II C.
Housing Trust Fund				
D. Eligible Activities	3	Mary Ellen Judah / Neighborhood Concepts, Inc.	Section D - Eligible Activities: Please consider amending the plan to allow HTF funds to be used for acquisition/rehabilitation of existing units. Utilizing HTF in such a way would contribute to the removal of blight in Alabama communities and further stabilization of underserved or declining neighborhoods.	No changes will be made.
D. Eligible Activities	3	Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA)	LIHCA recommends that AHFA include acquisition and rehabilitation in addition to new construction as eligible activies under the National Housing Trust Fund. Reason: Alabama has a significant number of existing vacant units, both single-and multifamily that are in need of repairs. Allowing grantees to acquire and rehabilitate propertis for affordable rental housing will not only work towards AHFA's goal of creating housing opportunities for individuals and families that are homeless or at risk of homelessness, but will also retain existing housing inventory and eliminate blight in communities.	
F. Maximum Allocation of HTF	4	Chris Retan/Aletheia House	There are some projects that are only going to be feasible if they can secure more than $1,350,000 in subsidy. We agree with the idea that these caps should be lifted if AHFA is at risk of having funds expire. However, it will be important that: 1) AHFA make an early decision that it will lift the per-project cap so developers will have enough time to identify sites and submit complete applications, and 2) that AHFA notify all potential applicants that it is seeking applications that can be above the cap. Developers are not	No changes will be made.

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			going to work on new projects that are above the subsidy cap unless AHFA specifically seek applications for these larger projects and give us enough time to put a larger project together.	
G. Maximum Per-Unit Development HTF Subsidy Limits	5	Chris Retan/Aletheia House	The maximum per unit development subsidy should be changed so the subsidy represents at least 90% of the total cost. With rents that are very low, stand-alone HTF projects can only support a very small amount of debt. The subsidies for the one bedroom and two-bedroom units for a HTF project that does not also have tax credits are too low. Also, the subsidies per square foot for each type of property should be similar. If you divide the maximum HTF subsidy by the minimum square footage in the design standards, the maximum subsidy is $88.50 per sf for one bedroom ($64,166 divided by 725 square feet), $131.62 for two bedrooms with two baths ($128,333 divided by 975 square feet) and $160.42 ($192,500 divided by 1,200 square feet). The only type of stand-alone HTF project (one that doesn't have another source of funding) that will be feasible under this plan will be three-bedroom units. It will be impossible to build one- bedroom units for single veterans using HTF without other subsidy if the maximum per unit subsidy is only $64,166. You may want to consider a separate subsidy limit for projects that are also receiving tax credits. But these subsidy limits also need to work for smaller projects that will only use HTF funds and a small amount of permanent debt.	This section will be revised as follows: AHFA will use the same methodology to determine the maximum project costs permitted for HTF-funded projects. For the current application cycle, the maximum amount of HTF funding that may be allocated to new construction projects, according to number of bedrooms, are as follows: 1 Bedroom $87,000.00 2 Bedrooms $128,333.00 3+ Bedrooms $192,500.00
G. Maximum Per Unit Development	5	Mary Ellen Judah / Neighborhood Concepts, Inc.	Section G - Maximum Per Unit Development HTF Subsidy Limits: Please consider an increase in per unit costs to account for the fact that smaller unit developments are typically more	

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HTF Subsidy Limits			expensive to build than larger multifamily developments that benefit from economies of scale.	
1) Points Gained **a. Geographic Diversity**	7	Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA)	LIHCA recommends increasing amount of points awarded to projects located in rural areas. Reason: The AHFA recognizes that the greatest concentration of need for affordable housing is observed in rural counties. LIHCA recommends raising the "geographic diversity" scoring from 5 points to 10 points.	Points will be increased from 5 to 10 for applications in rural areas (or non-metropolitan areas as defined by HUD area definitions) that expand the overall rental housing supply for households with incomes at or below either ELI or the federal poverty line (whichever is greater).
1) Points Gained **b. Applicant Capacity**	7	Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA	LIHCA recommends raising the maxium points awarded for projects serving "other ELI populations" from 10 points to 15 points. Reason: while the housing needs of ELI verterans is certainly a priority across our state, the housing needs of other ELI populations, especially those with physical or mental disabilities, are equally important.	No changes will be made.
1) Points Gained, **e. Leveraging**	8	Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	Add 25 points - where HTF funds are matched 1:1 with PHA funds or CDBG funds for replacement of multifamily housing units. Add 30 points - where HTF funds are matched 2:1 with PHA funds or CDBG funds for the replacement of multifamily housing units.	No changes will be made.
		Russell L. Bennett / Low Income Housing Coalition of Alabama (LIHCA	LIHCA thanks the AHFA for encouraging projects to proactively work with service providers, Continuums of Care, and other supportive services to ensure the needs of tenants are met throughout the entire HTF Affordability Period. LIHCA recommeneds AHFA provide some incentives in the form of scoring points for projects who work more closely with these	No changes will be made.

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			entities to ensure prospective tenants are able to maintain stable housing in a proposed project's units.	
General Comments				
		Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	5 year extension on Expired AHFA HOME Loans. There is currently no policy for what happens after the 5 year extension period. Most of these projects requested a 5 year extension because there were no means to pay down 30% of the HOME Loan. In most or all cases, this will still be the same after the 5 years is up. We suggest AHFA add language to the HOME loan extension policy to add an additional 5 year extension beyond the original 5 year period.	AHFA utilizes the Public Comment Period on the proposed Plans to provide opportunity for General Comments from the public regarding Affordable Housing in Alabama. The comments in this section do not require changes to the proposed Plans and are presented only for record.
		Jason Freeman / Gateway Development Corporation	5 year extension on Expired AHFA HOME Loans. There is currently no policy for what happens after the 5 year extension period. Most of these projects requested a 5 year extension because their were no means to pay down 30% of the HOME Loan. In most or all cases, this will still be the same after the 5 years is up. We suggest AHFA add language to the HOME loan extension policy to add an additional 5 year extension beyond the original 5 year period or allow a smaller scaled pay down percentage to be eligible for the 15 year extension. 4 points for a 10% paydown, 5 points for a 20% paydown, and 6 points for a 30% paydown.	
		Jordan Whiteside / Vantage Development, LLC ************** Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Allow income averaging so that rural deals including HOME will be more financially feasible. This could involve allocating the HOME funds to just certain units rather than 100% of the units. This would also allow tax credit only projects to target lower incomes for PHA developments and also would assist in the acquisition/rehab of affordable properties that may have just a few over income residents that would otherwise make the acquired properties not financially feasible	

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		************** Dave Truitt / CAPNA		
HTF		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Housing Trust Fund (HTF) dollars are underutilized. Use FHLB Community HERO's dollars in lieu of HTF for veterans/SF housing and put the HTF dollars in 4% deals.	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Cost of issuance. Issuer and legal fees are very high, compared to other states	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Lack of Soft Funds. Alabama lags behind most other states in providing soft funds as a whole.	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Alabama does not currently have a State LIHTC program. AAHA is supportive of establishing a State LIHTC. Several state syndicators have expressed interest in helping develop and invest in a State LIHTC program. Additionally, if we collaborate to enact a state LIHTC more access to CDBG funds will be gained.	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	AHFA has limited housing funding at its disposal. This is unlike neighboring agencies (like Georgia DCA), as ADECA holds some important housing development funds. We suggest that AHFA and ADECA collaborate to centralize funds and	

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		************** Dave Truitt / CAPNA	housing efforts. This would give AHFA more flexibility and a greater opportunity to fill financing gaps.	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Alabama's concentration of mostly smaller markets means lower AMI's and rents, which diminish debt proceeds. Rural deals struggle due to small size. For both New Construction and Rehab Deals, this means fewer investors are attracted and funding sources are thinner. We have listed below some concepts that we believe should be explored: • 9% deals – AHFA should consider adjusting the HOME program maturity requirements to permit flexibility. Adjusting the AHFA HOME loan maturity would allow it to match other government programs (i.e. USDA 538 debt, which has a minimum term of 25 years).	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	Again, Alabama's concentration of mostly smaller markets means lower AMI's and rents, which diminish debt proceeds. Rural deals struggle due to small size. For both New Construction and Rehab Deals, this means fewer investors are attracted and funding sources are thinner. We suggest that AHFA have a roundtable discussion with the development community to brainstorm on the issues centric to rural bond deals. We have listed below some concepts that we believe should be explored at the roundtable discussion: 4% side – pooled rural a) We suggest that AHFA allow their HOME debt to be subordinate to new bonds/TEL loan at 0.25%. Additionally, AHFA could have the flexibility to require interest be paid annually, or allow interest to accrue, depending on the economics of the deal b) Secondly, to assist with the viability of underwriting these rural rehab deals, consider protocols similar to what other states are doing (such as Ohio and Georgia, for example), whereby the agency will write-down the HOME loan balance at maturity to an amount supported by an appraisal	

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			(functionally debt forgiveness), and then permit the remaining balance to be refinanced as subordinate debt to the new bond debt.	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association ************** Dave Truitt / CAPNA	There are inherent challenges to development in MSA's: Much of this relates to scoring rules tied to minimum AMI levels in certain census tracts and restrictions on the number of applications that may be funded annually in a given MSA. We suggest that AHFA review scoring standards relating to minimum average AMI's in given census tracts and maximum deals in given counties and MSA's.	
		Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	Allow for more environmental flexibility on 4% deals - we suggest that AHFA defer to HUD environmental standards.	
		Rodney Corley / ARD, Inc.	Bond portfolios "roll ups" should not be subjected to the same fees associated with missing or incomplete items that 9% projects are. When submitting 15-20 applications at one time the penalties can be quite taxing on a deal that is already quite thin.	
		Rodney Corley / ARD, Inc.	For bond portfolios have one reasonable applcation feefor the portfolio rather than the per projetc fee normally charged. Again, these budgets are strained and reduced fees will help in bringing these projects to fruition.	
		Meagan Shannon Vlkovic / Enterprise Community Partners	Strengthening Green Criteria In 2004, Enterprise Community Partners introduced the Green Communities Criteria rating system to create green building metrics tailored specifically to the needs of affordable housing and improve the lives of residents. Since Green Communities' inception, we have nationally certified over 127,000 new or rehabilitated buildings. Enterprise Green Communities is referenced in 26 state Qualified	

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			Allocation Plans. Green building rating and certification systems help to ensure that projects funded by housing credits will not only create new housing opportunities, but ensure that people living in affordable housing are healthier, spend less money on utilities, and have more opportunities through their connections to transportation, quality food and healthcare systems. We encourage the Alabama Housing Finance Authority to consider inclusion of green building certification for optional points in the Draft 2020 Housing Credit Qualified Allocation Plan. 1. Southeastern states recognize the importance of affordable housing achieving green building certification. Many Southeastern states have already incorporated green building certification into their Qualified Allocation Plan. Currently, Florida, Georgia, Louisiana, and Mississippi all include green building certification as a threshold requirement. Currently Tennessee and Texas provide applicants with an opportunity to earn optional points for green building certification. Lastly, South Carolina provides applicants with an opportunity to earn optional points for energy efficiency certification. 2. Green building certification creates savings that outweigh the upfront costs. Overall, the median incremental cost of complying with the Enterprise Green Communities Criteria tends to be minimal: In an evaluation report from 2012, Enterprise found a median 2% increase to total development cost. The average project analyzed in this study achieved lifetime utility savings that exceed the cost of integrating the Enterprise Green Communities Criteria, with a simple payback of 5.59 years (2015 Enterprise Green Communities Criteria, page 2). 3. Green building certification creates buildings that are better for residents and the surrounding community. Not all	

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			the criteria have directly measurable financial impacts, but these criteria are no less important to meeting a project's mission. Projects exhibit improved occupant health and well-being through reduced exposure to environmental pollutants, improved connectivity to services and walkable neighborhoods, and good lighting. The benefits extend beyond the occupants to the neighboring community by supporting local community services and activating neighborhood streets, as well as improving water quality and reducing the impact of stormwater run-off on neighboring sewer systems. If the Alabama Housing Finance Authority does determine that adding green building certification for optional points is appropriate, it is important to define what is required of developers to achieve the optional points. We recommend incorporating two simple compliance measures for when a project is pursuing green building certification for optional points: • The project is certified through a qualified third party. • Certification documentation is submitted prior to issuing the IRS Form 8609. For questions or comments on Green Criteria recommendations, please feel free to contact Krista Egger at kegger@enterprisecommunity.org or 202.403.8003.	
		Meagan Shannon Vlkovic / Enterprise Community Partners	Thank you for providing this opportunity to comment on the Alabama Housing Finance Authority's (AHFA) Draft 2020 Housing Credit Qualified Allocation Plan. Enterprise Community Partners, a national Section 501(c)(3) charitable organization, brings together	

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			nationwide know- how, partners, policy leadership and investment to multiply the impact of local affordable housing development. Enterprise's mission is to create opportunity for low- and moderate-income people through affordable housing in diverse, thriving communities.	
		Lisa Bianchi-Fossati / Southface Institute	Southface is grateful for the opportunity to share our comments with AHFA regarding the Draft 2020 Housing Credit Qualified Allocation Plan. Southface Institute, a nonprofit 501(c)(3) organization, is a leader in sustainable advocacy, building, planning and operations across the U.S. With a mission to create a healthy and equitably built environment for all, Southface's programs, consulting services, workforce development, research and policy practices are supporting better homes, workplaces and communities. Experts in the fields of resource efficiency, building tech and organizational sustainability since 1978, Southface is committed to building a regenerative economy that meets tomorrow's needs today. Southface has building science expertise unique in the Southeast. In 1999, we partnered with the Greater Atlanta Home Builders Association to launch the EarthCraft building certification program. Providing a practical blueprint for green building and sustainable development, the EarthCraft family of programs has grown from single family homes to include multifamily, light commercial, historic building and community certifications today. The EarthCraft program places a high value on helping developments achieve energy and water efficiency as well as healthy indoor environments for all residents. The standards set by EarthCraft are vetted by an active membership of professional builders, helping to ensure that they are both rigorous and attainable.	

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			In addition, Southface is a trusted resource to help owners, builders and designers navigate the building certification process for most nationally recognized green building programs, including EarthCraft, Enterprise Green Communities, LEED and National Green Building Standard.	
		Judy Van Dyke, Kim Golden, Avery Smith / Vizion Driven Communities	Currently, the AHFA awards HOME funds only for applications made during the competitive 9% allocation process. However, additional 4% bond funded projects could be completed if AHFA made HOME funds available in an amount similar to the funds awarded to 9% transactions. The allocation of AHFA HOME funds could be made available only on a matching basis for these transactions. In particular, certain public housing authorities utilizing the RAD program and Section 18 could consider 4% transactions if additional AHFA HOME funds were available to be combined with local and PHA funding. The timing flexibility available under the 4% bond program also allows the applicant to pursue other sources of gap funding to help complete projects. Repaid HOME loan funds should be made available as well for these transactions. Utilizing the HOME funds in this fashion will also reduce the need to use 9% credits as the only mechanism for HOME funds to be awarded. Participating jurisdiction counties should also be eligible for HOME funds on 4% bond transactions as many of these jurisdictions do not receive HOME funds in amounts equal to the amounts allocated by the AHFA on HOME projects.	
		David Morrow / The Morrow Companies	Allow income averaging so that rural deals including HOME will be more financially feasible. This could involve allocating the HOME funds to just certain units rather than 100% of the units. This would also allow tax credit only projects to target lower incomes for PHA developments and also would assist in the acquisition/rehab of affordable properties that may have	

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			just a few over income residents that would otherwise make the acquired properties not financially feasible	
		David Morrow / The Morrow Companies	The maximum construction contingency should be increased from 4% to 5% for new construction and to 10% for rehabs due to the fact that all lender and investor require higher limits.	
	15	Arrice Faught / on behalf of the board of Alabama Affordable Housing Association	AHFA needs to offer more flexibility on their rehab standards Target the rehab requirements so as to not replace good materials (i.e. don't replace 3 year old roofs, or 5 year old windows, etc)	
	15	Jason Freeman / Gateway Development Corporation	AHFA needs to offer more flexibility on their rehab standards. Modify the rehab requirements so you don't have to replace good materials (i.e. don't replace 3 year old roofs, or 5 year old windows, etc)	

Again, AHFA thanks all individuals and entities who provided comments for consideration in developing the final 2020 Housing Credit Qualified Allocation Plan and HOME Action Plan. All comments and AHFA responses provided in this summary are subject to modification and approval by the applicable authorities as specified under Section 42.

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