

**SUMMARY OF CITIZEN PARTICIPATION PROCESS AND LISTING OF COMMENTS
RECEIVED 2027 HOUSING CREDIT QUALIFIED ALLOCATION PLAN, 2027 HOME
ACTION PLAN, 2027 NATIONAL HOUSING TRUST ALLOCATION PLAN**

In accordance with Section 42 of the Internal Revenue Code and the HOME and National Housing Trust Fund Regulations, notices of the Public Hearing and the 30-day public commenting period for the draft 2027 Housing Credit Qualified Allocation Plan, draft 2027 HOME Action Plan, draft 2027 National Housing Trust Fund Allocation Plan, (Plans) were published in the Athens News Courier, Decatur Daily, Dothan Eagle, Florence Times Daily, Fort Payne Times Journal, Gadsden Times, Montgomery Advertiser, Opelika Auburn News, and the Tuscaloosa News. To increase awareness of availability, the Plans and Public Hearing Notice were also posted on the Alabama Housing Finance Authority (AHFA) website, and on AHFA social media platforms (Facebook and LinkedIn). AHFA emailed 1,998 notices on February 3, 2026, and 2,001 notices on February 23, 2026, of the draft Plans availability to interested parties, requesting that they submit oral comments at the Public Hearing or written comments regarding the proposed Plans by 5:00 p.m. CDT on February 27, 2026. During the designated commenting period, AHFA received 22 written comments from 9 individuals and organizations pertaining to the 2027 Plans. The comments are attached and available for review at the following AHFA website link:

<https://www.ahfa.com/programs/rental-housing/allocation-application-information/current-year-allocation-plans>.

AHFA determined the appropriate action to take with respect to each comment received by evaluating each for:

- Clarity and ease of implementation within the proposed 2027 Draft Plans.
- Changes which would justify a major modification to the 2027 Draft Plans but would be more appropriate for consideration during the development of the 2028 Draft (or later year's) since the material nature of the changes proposed would require adequate time to implement and require a public commenting process.
- Changes suggested would require significant research, analysis, and planning to assess fully their practicality and feasibility before incorporation into the Plans. Accordingly, a public commenting process would be required, and the proposed changes would be evaluated for consistency with the stated goals and objectives of the Plans, applicable industry standards, and AHFA policies.
- Narrative comments, opinions, or questions which do not clearly define an actionable request or are unrelated to the current Draft Plans. Under these circumstances, staff is prohibited from attempting to interpret the commenter's intent.
- Industry specific or changes in regulatory guidance which require corrections to technical language in the Plans.

AHFA reviewed the comments received and revised the Plans based on certain comments submitted. A listing of the comments received are attached for review. Once the final Plans have been formally approved, we strongly encourage each reader to review the final Plans completely to view any changes made by AHFA in their full context. When revisions have been finalized and approved, the Plans will be available for review in their entirety at the following AHFA website link:

<https://www.ahfa.com/programs/rental-housing/allocation-application-information/current-year-allocation-plans>

AHFA wishes to thank the many individuals and organizations who provided comments during the commenting period. While all comments were carefully reviewed and considered, only the most equitable comments pertaining to the process for the entire state and the variety of program participants resulted in changes being made to the final Plans. As the administrator of the Plans, AHFA's goal is to develop written criteria for the Plans that will provide equal access to all types of affordable housing developments, which include but are not limited to: various construction types (new construction, acquisition, rehabilitation, and adaptive reuse, etc.); diverse target populations (families, seniors, persons with mental and physical

disabilities, Veterans, and homeless populations, etc.); and geographical characteristics (rural, metropolitan, qualified census tracts, distressed areas, etc.). In attempting to reach varied needs and population types across the state, our greatest challenge is to develop a fair and balanced allocation methodology with the intent to ensure that all applications, regardless of the targeted population and construction type, will have a fair chance of competing during each Application Cycle.

To that end, please keep in mind that certain perceived scoring impediments for a particular type of organization can be offset by other incentives in the Plans, which may not be necessarily applicable to other types of organizations. In addition, please consider that the Plans are not intended to serve as a replacement for other discontinued housing programs, which may have had different standards, costs, or otherwise. This is especially true as it relates to construction design standards. Any applicant that proposes to include design standards that significantly exceed AHFA standards or to include other design standards mandated by other programs must obtain additional funding sources to offset any additional costs, assuming the project's costs exceed AHFA's definition of reasonable costs. As an alternative and when feasible, applicants should consider submitting an application for Multifamily Housing Revenue Bonds, which are subject to availability, and subject to the criteria and requirements of the applicable Plan.

See Attached, Listing of Comments Received

- A. Public Comments Submitted to AHFA. The comments are available for viewing at the following AHFA website link: <https://www.ahfa.com/programs/rental-housing/allocation-application-information/current-year-allocation-plans>.

2027 Citizen Participation Process

Listing of Comments Received

2027 Draft Plans:

This document contains the cumulative list of comments received with respect to the 2027 Citizens Participation Process.

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National Housing Trust Fund Allocation Plan
Public Comment Form

Commenting Period January 28, 2026 – February 27, 2026

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Select Date Submitted

Name: Chris Retan Organization: Aletheia House Email: cretan@specialkindofcaring.org Phone: (205) 533-6012

Plan Section	Section Reference	Page #	Specific Comments
HOME	III	12	<p>The HOME plan shows projected available funds of \$54 million, including \$7 million in program income and \$36 million in unexpended HOME funds. Based on the agency's history of awarding HOME funds with tax credits, and its success in securing loan repayments, there will likely be a significant surplus of funds after the HOME/tax credit awards are made.</p> <p>There is a huge need for affordable housing in Alabama, and HOME funds are a critical tool for developing more housing. We need a strategy to put these funds to work instead of building a larger and larger surplus.</p> <p>Rather than continuing to carry forward these funds, AHFA should use these funds to support smaller projects developed by CHDOs that would use HOME funds without tax credits.</p> <p>Despite efforts over several years to increase the number of CHDOs who receive HOME funding from AHFA, the number of certified CHDOs remains fairly small. We need to have an opportunity for CHDOs to gain experience by developing projects that are 10-20 units using HOME funds.</p> <p>These smaller projects would also increase the opportunity for CHDOs to develop in-fill housing in urban communities where there is not enough available land to build a larger HOME/tax credit project.</p>
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2/11/2026

Name: Manuela Ekowo Organization: Insurance Institute for Business & Home Safety (IBHS) Email: mekowo@ibhs.org Phone: _____

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	II	15	<p>AHFA should add resilient construction practices to the Application Threshold Requirements. All AHFA projects should obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety, as follows:</p> <p>11) Resilient Construction. Commit to resilient construction standards. All projects must obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety.</p> <p>Based on decades of scientific research, IBHS’s FORTIFIED™ program is a set of voluntary, beyond-code construction upgrades that improve a building’s resistance to the effects of high winds, hail, hurricanes and even tornadoes. The FORTIFIED program is available for single-family houses, multifamily properties, and commercial structures. The program features a technical standard and an independent verification process that ensures that buildings obtaining a FORTIFIED designation from IBHS have, in fact, reduced their risk.</p> <p>Adding a FORTIFIED requirement would bring AHFA into alignment with other Alabama state entities—particularly the Department of Insurance—as well as provide better protection for state investments in affordable housing.</p> <p>A recent study by the Center for Risk and Insurance Research (CRIR) at the University of Alabama examined over 40,000 properties affected by Hurricane Sally and found IBHS FORTIFIED homes were 70% less likely to have an insurance claim compared to traditional construction. The peer-reviewed study evaluated the real-world effectiveness of the FORTIFIED program, showing that FORTIFIED homes suffered</p>

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			<p>significantly less damage and required fewer insurance claims than standard homes. When a claim was filed on a FORTIFIED home, the average damage was 22% less severe.</p> <p>Additionally, the report estimates that if every affected home had been built to the FORTIFIED Roof standard, total damage would have been reduced by more than \$147 million—saving homeowners \$42 million and insurers \$105.6 million in losses.</p> <p>The study also found that FORTIFIED designated homes outperformed houses built to codes with very similar requirements by more than 50%, demonstrating the importance of the program's documentation and review process.</p> <p>The value of FORTIFIED Multifamily has also been explored in a 2022 study from the University of Alabama’s Culverhouse College of Business, which concluded that building or retrofitting to FORTIFIED has relatively minimal costs and a strong rate of return.</p> <p>Further, a new IBHS study exploring opportunities to enhance the resilience of Section 8 multifamily and single-family housing in the Atlantic and Gulf coast regions estimates that retrofitting these properties with a FORTIFIED Roof could decrease losses by 30-50 percent.</p>
Housing Credit	Point Scoring	A-6	<p>AHFA already incentivizes some storm features such as storm shelters.</p> <p>AHFA should expand incentives for resilience by offering a maximum of 4 points to all projects that obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety.</p> <p>Award 1 point to projects that obtain a FORTIFIED Roof designation. Award 2 points to projects that obtain a FORTIFIED Silver designation. Award 3 points to projects that obtain a FORTIFIED Gold designation. Award 1 additional point to projects that obtain any FORTIFIED designation with Hail Supplement.</p> <p>In the absence of requirements, incentives via the scoring criteria encourage developers to build to FORTIFIED. See prior comment for information regarding the efficacy of FORTIFIED in increasing the survivability and insurability of housing in Alabama.</p>
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2/26/2026

Name: Patricia Beshay Organization: Rule Enterprises Email: patricia@ruleenterprises.com Phone: 734-223-1622

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Point Scoring	A-1 of 13	AHFA’s balanced distribution goal and the “generally only one project per county” practice can unintentionally prevent delivery of redevelopment work in counties that include HUD Participating Jurisdictions (PJs), where some projects must use local PJ HOME rather than AHFA HOME. Recommend a limited exception to allow a second award in a county in the same cycle when: (1) the first awarded project in the county is funded with AHFA-administered HOME (state HOME), and (2) the second project is located in a PJ within that county, is funded with local PJ (city/county) HOME, and (3) the second project is at least two miles from the first awarded project. This exception supports balanced distribution by avoiding clustering (distance requirement), while allowing counties with both state HOME and PJ HOME activity to move forward without being blocked by a county cap that treats all HOME sources as interchangeable. To avoid unintended consequences, limit this exception to one additional project per county per cycle, require documentation of the local HOME commitment, and retain AHFA discretion to deny if market, concentration, or feasibility concerns exist.
HOME	Point Scoring	7 and 21	The combination of (1) the restriction on HOME applications paired with Housing Credits in HUD Participating Jurisdictions (PJs) and (2) the 56-unit HOME rental project cap makes AHFA HOME effectively unavailable for federally awarded, time-limited, multi-phase redevelopments located in PJs, where phases often must exceed 56 units to remain feasible and meet required delivery schedules. Recommendation: Add a narrowly tailored exception that allows AHFA to accept and consider HOME applications paired with Housing Credits for projects in PJs and exceeding 56 units when the project is a documented phase of a federally awarded redevelopment program with hard deadlines (example: HUD Choice Neighborhoods Implementation). If AHFA prefers not to

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2/26/2026

Name: Vicki Lundy Wilbon Organization: The Integral Group Email: vlwilbon@integral-online.com Phone: 404.224.1882

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Point Scoring	A-1 of 13	AHFA’s balanced distribution goal and the “generally only one project per county” practice can unintentionally prevent delivery of redevelopment work in counties that include HUD Participating Jurisdictions (PJs), where some projects must use local PJ HOME rather than AHFA HOME. Recommend a limited exception to allow a second award in a county in the same cycle when: (1) the first awarded project in the county is funded with AHFA-administered HOME (state HOME), and (2) the second project is located in a PJ within that county, is funded with local PJ (city/county) HOME, and (3) the second project is at least two miles from the first awarded project. This exception supports balanced distribution by avoiding clustering (distance requirement), while allowing counties with both state HOME and PJ HOME activity to move forward without being blocked by a county cap that treats all HOME sources as interchangeable. To avoid unintended consequences, limit this exception to one additional project per county per cycle, require documentation of the local HOME commitment, and retain AHFA discretion to deny if market, concentration, or feasibility concerns exist.
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Select Date Submitted

Name: Thom Amdur Organization: Lincoln Avenue Communities Email: tamdur@lincolnavenue.com Phone: 646-585-5526

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Section	20	Multifamily Housing Revenue Bonds: We believe it is in AHFA’s interest to create a regulatory environment that encourages the most talented, experienced and best capitalized LIHTC developers to work in Alabama. We also agree that a successful track record of development experience is one of the strongest indicators of the future success of an affordable housing development. We further recognize that multifamily bond developments are inherently more challenging than competitive 9% developments, largely due to the scale of these developments and the more limited subsidy available. We believe it is reasonable that AHFA limit the number of applications that a true first-time LIHTC developer can submit if they have not previously and successfully financed, developed, built, and delivered affordable units to market. We believe that AHFA’s policy as drafted, which prohibits “any applicant having a single (first time AHFA funded) Multifamily Housing Revenue Bond Project” from submitting a first-time competitive application [9% LIHTC] until the bond project is complete, 90% occupied and having completed a 3rd party construction inspection may be appropriate for a true first-time LIHTC developers but discourages experienced developers that have yet to do work yet in Alabama from investing in infrastructure and development pipeline that would benefit the state’s low income residents. We strongly encourage AHFA to give positive consideration to applicants with demonstrated LIHTC experience gained out-of-state and permit them to submit multiple applications. For context, Lincoln Avenue Communities (as well as other high-capacity developer peers) has successfully developed and delivered dozens of LIHTC and bond developments across the country in recent years. We have dedicated teams to handle all aspects of the development process including design and construction

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			<p>management team, financial management, asset management and a deep bench of more than 115 development and project management professionals. Furthermore, LAC works exclusively with high-capacity property management firms that have been approved to work in the state and also have a demonstrated capacity to deliver multiple projects simultaneously. LAC has been further recognized by our financial partners for our capacity to work at scale. For example, we have been vetted and designated by Freddie Mac as an Impact Sponsor. We share this resume to emphasize that some “first-time applicants” bring substantive, demonstrated experience that should deserve different treatment than the language that is currently in the QAP. Unfortunately, this year we have declined to pursue several competitive and highly impactful affordable housing development opportunities in Alabama because of the current first-time AHFA funded language in the QAP limiting us to just a single bond application. Given the current affordable housing crisis, we believe it is in the best interest of AHFA and low-income residents across the state to incentivize high-capacity developers that can demonstrate capacity to invest in the state and, when possible, to do so at scale. We recommend that AHFA waive the current first time AHFA funded language for experienced LIHTC developers. We suggest that a developer that can demonstrate that it has successfully placed in service and received 8609s at 8-10 LIHTC projects (regardless of location) over the past 3 years should give AHFA confidence of their ability to successfully manage multiple developments and at a minimum be able to submit a simultaneous competitive 9% application.</p>
Housing Credit	II	26	<p>Developer Fee: Construction materials pricing and supply chain disruptions continue to be a significant challenge to financing affordable housing in Alabama. The industry is also experiencing significant inflation in the cost of insurance and land prices and building acquisition costs remain stubbornly high and labor costs are a significant barrier to financing and delivering quality affordable housing communities to the market. The compelling financial attribute of the four percent LIHTC program is the “as of right” credits that come with meeting the IRC Section 142 requirements along with the threshold requirements set forth in AHFA’s QAP. While PAB volume cap is a limited resource, the credits associated with Tax-Exempt Bond (TEB) transactions are only limited by the amount of eligible basis. This is a significant difference from the nine percent LIHTC program where the allocation of annual credit authority is capped. We recommend that AHFA take proactive steps in its QAP to maximize eligible basis at</p>

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			<p>properties financed with private activity bonds and 4% LIHTCs, which in turn will generate additional tax credits and make more projects financially feasible with TEBs. From a practical perspective, increasing developer fees in a rising cost environment, as we are experiencing today, generates additional eligible basis and additional tax credit equity. This can be particularly impactful on 4% bond transactions where the LIHTCs are capped by eligible basis rather than an annual state ceiling. Maximizing developer fees, within the constraints of the tax law, regulation, and reasonable underwriting, is a proven and successful method of generating additional LIHTC eligible basis, and in turn, equity proceeds which help fill project gaps and/or reduce the need to obtain state gap financing resources. We defer a substantial portion of our developer fees to fill project gaps. We also believe it is important to acknowledge the role developer fees play in affordable housing transactions as well when you consider the appropriate fee setting mechanism. The IRS permits the inclusion of developer fees in eligible basis because these fees serve as the primary form of compensation for LIHTC developers. They pay for overhead of essential functions, including accounting, human resources, information technology, asset management, insurance and legal fees and many others. Developer fees also serve as the primary form of reimbursement for pre-development costs and resident services. Furthermore, unlike with the 9% program, there is no mechanism to provide additional supplemental allocations of LIHTCS to fill project gaps under exigent circumstances. We believe that a 15% developer fee for bond-financed projects is low, as compared to your peer state housing finance agencies. The following states all permit high-developer fees for TEB financed projects and include the total development costs in the fee calculations: Tennessee (25%), Oklahoma (20%), Ohio (20%), Arizona (19%) and Wisconsin (20%).</p> <p>1. We recommend the AHFA to raise the developer fee for bond financed deals from 15% of total development costs to a flat 20% of total development costs (excluding the developer fee and reserves).</p> <p>2. We further recommend that AHFA require developers of bond financed projects to defer all developer fee above 15% or at least 20% of the total developer fee, whichever is greater.</p> <p>Additionally, we recommend raising the cap on developer fee for acquisition costs from 8% to the final adopted ceiling.</p>
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2/26/2026

Name: Meghan Venable-Thomas Organization: City of Birmingham- Community Development Email: meghan.venable-thomas@birminghamal.gov Phone: 205-254-2309

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Housing Credit	Point Scoring	A-1 of 13	AHFA’s balanced distribution goal and the “generally only one project per county” practice can unintentionally prevent delivery of redevelopment work in counties that include HUD Participating Jurisdictions (PJs), where some projects must use local PJ HOME rather than AHFA HOME. Recommend a limited exception to allow a second award in a county in the same cycle when: (1) the first awarded project in the county is funded with AHFA-administered HOME (state HOME), and (2) the second project is located in a PJ within that county, is funded with local PJ (city/county) HOME, and (3) the second project is at least two miles from the first awarded project. This exception supports balanced distribution by avoiding clustering (distance requirement), while allowing counties with both state HOME and PJ HOME activity to move forward without being blocked by a county cap that treats all HOME sources as interchangeable. To avoid unintended consequences, limit this exception to one additional project per county per cycle, require documentation of the local HOME commitment, and retain AHFA discretion to deny if market, concentration, or feasibility concerns exist.
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2/27/2026

Name: David Morrow Organization: Morrow Realty Company Email: davidm@morrowrealty.com Phone: 205-759-5781

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	II	20	E. 1. iii. Allow a Basis Boost in all Rural Areas for new construction and Rural Development rehabilitation projects to make them more financially feasible. We also request that AHFA allow a Basis Boost to census tract areas that are adjacent to or within a mile radius of a QCT or DDA to allow for better diversity of geographic areas for housing throughout the state.
Housing Credit	II	31	J. 3. Occasionally the initial syndicator's pricing changes and another syndicator is more competitive by the time the project closes. We suggest that changing syndicators should not be a negative action and when notifying AHFA of a change of syndicator there should not be a change fee assessed.
General Comment	Section		Please remove the requirement for telephone service letters as part of the application process. The use of land line telephones is virtually non-existent. Telephone service providers simply refuse to provide such letters making them increasingly difficult to obtain. Alternatively, allow wireless carriers that service the areas to write letters.
Housing Credit	I		Please consider removing the charge for changes to the schematic site plan. The plan submitted at application is preliminary and done without topo survey or local governmental input. These and other factors make it nearly impossible for the site plan not to be modified after the initial application.
General Comment	Section		We recommend that AHFA insert language, such as an addendum for possible supplemental funding round, additional credits, and/or other resources, or exchange of credits in the 2026-2027 QAP. This would give AHFA the flexibility to address funding and cost overrun issues or time

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Plan Section	Section Reference	Page #	Specific Comments
Addendum A — Point Scoring System	Project Characteristics: Energy/Water Conservation and Healthy Living Environment	35	We recommend that AHFA add a new optional scoring item that awards points to multifamily projects that obtain a FORTIFIED designation from the Insurance Institute for Business & Home Safety (IBHS). FORTIFIED is a voluntary, beyond-code construction standard with three incremental designation levels (Roof, Silver, and Gold) that improve a building's resistance to high winds, hurricanes, and tornadoes through an independently verified process. We suggest 1 point for FORTIFIED Roof, 2 points for FORTIFIED Silver, and 3 points for FORTIFIED Gold. This fits naturally within the existing energy and healthy living environment category, as FORTIFIED directly reduces weather-related damage, supports tenant safety, and improves long-term property viability. Alabama leads the nation with over 55,000 FORTIFIED-designated structures, indicating that a trained workforce already exists statewide to implement this standard at a manageable cost. A 2022 University of Alabama study found that new multifamily construction to FORTIFIED Gold yields an 8.1–72% return on a marginal cost increase of no more than 1.5% of total construction cost. Adding optional points now would build developer familiarity and lay the groundwork for a future threshold requirement, creating more survivable and insurable affordable housing for Alabamians.
Addendum A — Point Scoring System	Project Characteristics: Type of Construction	32	As a companion to the incentive described above, we recommend that AHFA consider a path toward making FORTIFIED Roof a threshold construction requirement in a future QAP cycle, beginning with an optional scoring incentive in 2027. A peer-reviewed study from the University of Alabama examined over 40,000 properties affected by Hurricane Sally and found that FORTIFIED homes were 70% less likely to have an insurance claim and, when a claim was filed, had average damage 22% lower. The study estimates

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			<p>that if all affected homes had been built to the FORTIFIED Roof standard, total damage would have been reduced by more than \$147 million. Given Alabama's severe storm exposure and the existing contractor ecosystem, a phased approach — an incentive in 2027, with threshold consideration in a subsequent cycle — would allow developers to build capacity and comfort with the standard before it becomes mandatory, avoiding an undue burden while meaningfully improving housing quality statewide.</p>
<p>Section I.B — Establishment of Housing Priorities</p>	<p>Housing Priorities</p>	<p>3</p>	<p>We recommend that AHFA explicitly add resilient construction as a stated housing priority. Current priorities focus on quality, affordability, and tenant services but do not address the survivability of the housing stock following natural disasters. Given Alabama's vulnerability to hurricanes, tornadoes, and severe wind events, housing cannot be considered truly quality unless it is also survivable. Adding resilient construction — with IBHS FORTIFIED as a defined standard — to AHFA's housing priorities would provide a policy foundation for the scoring incentive described above and signal AHFA's long-term commitment to building housing that keeps Alabamians housed through and after disasters. Rising insurance costs also make resilience a direct affordability issue: FORTIFIED properties in Louisiana saved an average of \$1,250 annually on insurance premiums, with FORTIFIED roofs paying for themselves in under five years.</p>