

# The Housing Company

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Attention: Comments/RIN 2590-AA83  
Federal Housing Finance Agency  
400 Seventh Street, SW, Eighth Floor  
Washington, D.C. 20219

Thank you for the opportunity to comment on the proposed changes to the AHP amendments.

I am a Development Manager with The Housing Company, a non-profit affordable housing developer located in Boise, Idaho. I have had a few years of experience with the AHP program and received an award on a past project in San Diego, California. AHP funding is an important source of funding for many developments. That said, I believe the stipulations of the program could use some revisions.

I have the following comments:

- Sponsors are now being required to serve targeted populations at higher threshold levels (baseline from 20% to 50%). I request that current thresholds remain in place. A 50% threshold would not be financially or logistically feasible for many, if not most rental developments.
- Rental projects should only be required to submit one operating proforma including housing and supportive services. The proposed requirement of submitting two proformas is unnecessary.
- The scoring criteria is overly focused on creating housing for “homeless” and/or “special needs” populations. I am not against this type of development, but the need to score points in this category is not always financially feasible for otherwise great projects. Having reserves established for homeless units is a necessity and not always possible.
- This comment may be faced with adversity, but I hope that the period between the application deadline and the award be shortened. Waiting 6-7 months for an award notification can be difficult when trying to establish commitments and a project framework.

Thanks for your consideration,

*Blake Jumper*

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