

APPENDIX E

PUBLIC COMMENTS

According to the State's Citizen Participation Plan, and as part of the outreach effort to promote citizen participation in the Annual Action Plan (AAP) planning process, AHFC held two public hearings, participated in several community development events, and solicited and received individual comments from citizens throughout the state. The State also solicited public input regarding the upcoming National Housing Trust Fund (NHTF).

AHFC conducted a first public hearing on March 16, 2016 at the Alaska Gasline Development Corporation main offices in Anchorage, Alaska prior to the release of the AAP draft to gain public input into the development of this plan and the NHTF. It also held a second Public hearing during the public comment period on April 5, 2016. The second hearing was held on April 5, 2016; at the hearings AHFC provided an overview of the consolidated planning process and the programs it covers; a description of the performance of the current HOME, ESG and CDBG programs, the timeline for the development of the AAP; and a description of the NHTF. The hearings were teleconferenced statewide and the records were transcribed and are attached to the AAP in Appendix D. There were two public comments submitted at the second hearing.

The AAP was published on the AHFC website on March 17, 2016 and remained available for public comment until close of business on April 15, 2016. During this public comment period written comments were received from the Saint Vincent de Paul Society, the City & Borough of Juneau, and the Municipality of Anchorage. These comments are summarized below and the State's responses are provided.

Comments 1 and 2 were submitted by the City and Borough of Juneau:

Comment 1: Scott Ciambor from the City and Borough of Juneau (CBJ) and Mandy Cole, Co-Chair of the Juneau Coalition for Housing and Homeless stated that for various reasons the CBJ should be considered a sub-grantee for the National Housing Trust Fund (NHTF). Their comments lists four reasons to be considered:

1. The CBJ created the Juneau Affordable Housing Fund as an entity capable of managing NHTF funding allocated to the CBJ.
2. Through the Point-in-time count and other indexes, the CBJ has established the need for housing for its low and extremely low income residents.
3. There is a 32-unit permanent supportive housing project for the chronic homeless underway with \$3.3 million in committed funds, which can expand to 52 units in a future phase II with the help of NHTF funds.
4. The CBJ is developing a Housing Action Plan, already in draft form.

State Response to Comment 1: According to the Code of Federal Regulations (CFR) No. 24 CFR 93.2 defines a “subgrantee” as a unit of general local government that has an approved consolidated plan submitted in accordance with 24 CFR 91. The regulations at 24 CFR Part 91 require units of general local government which receive CDBG, HOME, ESG or HOPWA formula funds to develop and submit a consolidated plan and/or annual action plan, outlining the use of the formula funds. Therefore, by definition, an eligible HTF sub-grantee must be a direct formula grantee that submits a consolidated plan and annual action plans.

Comment 2: The City and Borough of Juneau disagrees with the State’s plans to add the coming NHFT funding to the Greater Opportunities for Affordable Living (GOAL) program. Doing so would only continue funding existing projects that don’t take Juneau into account based on its priority needs. One of which the CBJ has gone to great lengths to demonstrate such as the need for low-income housing.

Ciambor offered to help the State develop a formula that leads to a fair distribution of NHTF funds to the CBJ based on a fair and representative number. This formula could be used each time NHTF are awarded to the State.

State Response to Comment 2: Since 2013, AHFC has funded all six rental development proposals received from Juneau through the GOAL and SNHG programs. These developments include over 150 units of newly constructed rental housing. Given the strong allocation rate to proposals from Juneau in recent years, AHFC does not anticipate the community will experience any competitive disadvantage when applying for NHTFs through the GOAL program.

Comments 3 and 4 were submitted by the Municipality of Anchorage:

Comment 3: John C Laux, from the Municipality of Anchorage (MOA), shared the Municipality’s National Housing Trust Fund Resolution, through which the Municipality’s Department of Health and Human Services Commission recommends that AHFC designates “the Municipality of Anchorage as the sub-recipient for all Housing Trust Fund allocations within the municipality in the amount proportionate to the population and income demographics”.

State Response to Comment 3: As the recipient of NHTF, AHFC is ultimately responsible to HUD for the performance obligations of the NHTF. In the event of NHTF noncompliance that triggers recapture, AHFC would ultimately be the agency responsible for repaying HUD any program funds. AHFC has confirmed that the agency’s liability to HUD would remain even if the noncompliance was from activities funded through a sub-grantee such as the Municipality of Anchorage. Consequently, AHFC will require the Municipality of Anchorage to indemnify AHFC in the event of noncompliance as a condition of any funding that is sub-granted from AHFC to the