



January 10, 2011

Representative Bryce Edgmon
Alaska State Capitol, Room 416
Juneau, Alaska 99801

**SUBJECT: PROPOSED REVISIONS TO AS 18.56.010 – SENIOR CITIZENS HOUSING
DEVELOPMENT FUND**

Dear Representative Edgmon:

I am writing on behalf of Cook Inlet Housing Authority (CIHA), the state chartered regional housing authority for the Cook Inlet Region., and a member of the Association of Alaska Housing Authorities (AAHA). We offer our support for a proposed amendment to AS 18.56.010 to explicitly include Alaska's regional housing authorities as eligible recipients under the Alaska Housing Finance Corporation (AHFC) Senior Citizens Housing Development Fund (SCHDF) program.

The SCHDF program was created to provide funding to assist organizations in the development of senior citizen housing through grant awards for acquisition, rehabilitation, accessibility modification and new construction activities. CIHA and other Alaska regional housing authorities are some of the most qualified and experienced developers of senior housing in the state; in fact, CIHA itself is now the largest provider of senior housing in Alaska.


The current language of AS 18.56.010 excludes regional housing authorities from eligibility for SCHDF funds, because although they are tax exempt for I.R.S. purposes, they are not 501(c)(3) or (4) entities. The rationale for this distinction is unclear, and more importantly, has not been uniformly applied by AHFC in past grant awards. AHFC has awarded SCHDF grant funds to many regional housing authorities in the past, including CIHA, and only last year determined that regional housing authorities were actually not named as eligible recipients. The statutory language is unclear in that it names "public and private non-profit 501(C)(3) or (4) organizations" as eligible recipients. Although regional housing authorities are in fact public corporations, they are not "public non-profit" (i.e., 501(C)(3) entities). Inclusion of "regional housing authorities" to the list of eligible participants in the program would help clear this confusion.

AHFC's past award of SCHDF to regional housing authorities for senior housing development has set a precedent for regional housing authority eligibility for these funds. Regional housing authorities are also collectively the largest developer of housing, including senior housing, in the State. Denying regional housing authorities access to these valuable funds will result in a significant reduction in the delivery of greatly needed senior housing in rural and urban areas of the state. Further, there would not be any financial impact to the state's general fund if regional housing authorities were permitted to continue to access SCHDF funds. For these reasons, CIHA strongly supports AAHA's proposal to expressly include regional housing authorities organized under AS 18.55.996 to the list of entities eligible for the direct receipt of SCHDF funds.

SCHDF Representative Edgmon
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It is our understanding that your office has agreed to sponsor legislation to provide for the requested statutory change. We very much appreciate your efforts to assist in this matter, and if there is anything further we can do to help in this effort please do not hesitate to contact us.

Respectfully,



Carol Gore
President/CEO

cc: Heather Arnett, AAHA Statewide Administrator



January 4, 2011

Rep. Bryce Edgmon
Alaska State Capitol, Room 416
Juneau, AK 99801

Re: Proposed Revisions to Sec. 18.56.810: Senior Citizens Housing Development

Dear Rep. Edgmon,

I am writing on behalf of Aleutian Housing Authority (AHA), one of the 14 state chartered regional housing authorities and a member of the Association of Alaska Housing Authorities (AAHA) to offer our support for a proposed statutory amendment which would provide for the direct eligibility of Alaska housing authorities under the AHFC Senior Citizens Housing Development Fund Program.

The program was created to provide funding to assist organizations attempting to develop senior citizen housing for seniors 60 years of age and older and whose incomes are in the low to moderate ranges. Acquisition, rehabilitation, accessibility modification and new construction of senior housing as well as pre-development activities are all eligible for grant awards.

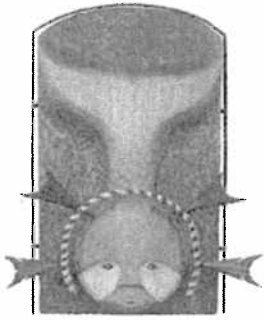
Although Alaska's regional housing authorities are some of the most experienced and qualified housing developers in the state, current statutory language limits program eligibility to municipalities or public or private nonprofit corporations designated as tax exempt under 26 U.S.C. 501©(3) and (4) (Internal Revenue Code of 1954). Regional housing authorities do not meet this technical definition and are thus unable to directly access this particular program as a resource to address increasing senior housing needs throughout the state. Aleutian Housing strongly supports the proposal by AAHA to add regional housing authorities, as defined under AS 18.55.996, to the specified eligible entities which can apply for and receive these funds.

It is our understanding that your office has agreed to sponsor legislation which would provide for the requested statutory change. We very much appreciate your efforts to assist in this matter. If there is anything further we can do to help in your efforts, please do not hesitate to contact us.

Sincerely,

Dan Duame
Executive Director

Cc: Heather Arnett, AAHA Statewide Administrator



Kodiak Island Housing Authority

3137 Mill Bay Road, Kodiak AK 99615

kodiakislandhousing.org

Phone: 907-486-8111 Toll Free: 800-478-5442 Fax: 907-486-4432

January 6, 2011

Rep. Bryce Edgmon
Alaska State Capitol, Room 416
Juneau, AK 99801

Re: Proposed Revisions to Sec. 18.56.810: Senior Citizens Housing Development

Dear Rep. Edgmon,

I am writing on behalf of the Kodiak Island Housing Authority (KIHA), one of 14 state chartered regional housing authorities who are members of the Association of Alaska Housing Authorities (AAHA). We offer our support for a proposed statutory amendment which would provide for the direct eligibility of Alaska housing authorities under the AHFC Senior Citizens Housing Development Fund Program.

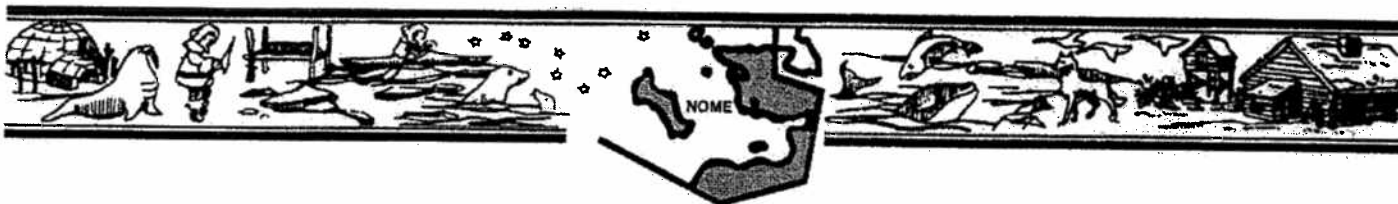
The program was created to provide funding to assist organizations attempting to develop senior citizen housing. Acquisition, rehabilitation, accessibility modification and new construction of senior housing as well as pre-development activities are all eligible for grant awards.

Although Alaska's regional housing authorities are some of the most experienced and qualified housing developers in the state, current statutory language limits program eligibility to municipalities or public or private nonprofit corporations designated as tax exempt under 26 U.S.C. 501(c)(3) and (4) (Internal Revenue Code of 1954). Regional housing authorities do not meet this technical definition and are thus unable to directly access this particular program as a resource to address increasing senior housing needs throughout the state. KIHA strongly supports the proposal by AAHA to add regional housing authorities, as defined under AS 18.55.996, to the specified eligible entities which can apply for and receive these funds.

It is our understanding that your office has agreed to sponsor legislation which would provide for the requested statutory change. We very much appreciate your efforts to assist in this matter. If there is anything further we can do to help in your efforts, please do not hesitate to contact us.

Sincerely,

Marty Shuravloff
Executive Director



BERING STRAITS REGIONAL HOUSING AUTHORITY
Robert Mocan, President/CEO

P. O. Box 995 Nome, AK 99762
Phone No. (907) 443-5256
Fax No. (907) 443-8652
Toll Free No. 1-800-478-5255

January 27, 2011

Rep. Bryce Edgmon
Alaska State Capitol, Room 416
Juneau, AK 99801

Re: Proposed Revisions to Sec. 18.56.810: Senior Citizens Housing Development

Dear Rep. Edgmon,

I am writing on behalf of [Bering Straits Regional Housing Authority], one of 14 state chartered regional housing authorities who are members of the Association of Alaska Housing Authorities (AAHA). We offer our support for a proposed statutory amendment which would provide for the direct eligibility of Alaska housing authorities under the AHFC Senior Citizens Housing Development Fund Program.

The program was created to provide funding to assist organizations attempting to develop senior citizen housing. Acquisition, rehabilitation, accessibility modification and new construction of senior housing as well as pre-development activities are all eligible for grant awards.

Although Alaska's regional housing authorities are some of the most experienced and qualified housing developers in the state, current statutory language limits program eligibility to municipalities or public or private nonprofit corporations designated as tax exempt under 26 U.S.C. 501©(3) and (4) (Internal Revenue Code of 1954). Regional housing authorities do not meet this technical definition and are thus unable to directly access this particular program as a resource to address increasing senior housing needs throughout the state. [Bering Straits Regional Housing Authority] strongly supports the proposal by AAHA to add regional housing authorities, as defined under AS 18.55.996, to the specified eligible entities which can apply for and receive these funds.

It is our understanding that your office has agreed to sponsor legislation which would provide for the requested statutory change. We very much appreciate your efforts to assist in this matter. If there is anything further we can do to help in your efforts, please do not hesitate to contact us.

Sincerely,

Robert Mocan
BSRHA
President/CEO

Cc: Heather Arnett, AAHA Statewide Administrator



P.O. Box 50 Dillingham, Alaska 99576 Phone (907) 842-5956
Fax (907) 842-2784 TTY Phone (907) 842-6541

January 5, 2011

Rep. Bryce Edgmon
Alaska State Capitol, Room 416
Juneau, AK 99801

Re: Proposed Revisions to Sec. 18.56.810:
Senior Citizens Housing Development

Dear Rep. Edgmon:

Bristol Bay Housing Authority (BBHA) supports a proposed statutory amendment which would provide for the direct eligibility of Alaska housing authorities under the AHFC Senior Citizens Housing Development Fund Program. As you are aware, BBHA is one of 14 state chartered regional housing authorities who are members of the Association of Alaska Housing Authorities (AAHA).

The program was created to provide funding to assist organizations attempting to develop senior citizen housing. Acquisition, rehabilitation, accessibility modification and new construction of senior housing as well as pre-development activities are all eligible for grant awards.

Although Alaska's regional housing authorities are some of the most experienced and qualified housing developers in the state, current statutory language limits program eligibility to municipalities or public or private nonprofit corporations designated as tax exempt under 26 U.S.C. 501©(3) and (4) (Internal Revenue Code of 1954). Regional housing authorities do not meet this technical definition and are thus unable to directly access this particular program as a resource to address increasing senior housing needs throughout the state. In the past, AHFC has interpreted the regulations to define Housing Authorities as eligible applicants and recipients of such funds. However, after a AG opinion on the topic, AHFC has reversed that interpretation of eligibility of Housing Authorities to directly participate in the program. BBHA strongly supports the proposal by AAHA to add regional housing authorities, as defined under AS 18.55.996, to the specified eligible entities which can apply for and receive these funds.

Thank you for sponsoring legislation which would provide for the requested statutory change. We appreciate your efforts to assist in this matter. Please contact me for any further information you may need on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave McClure", is written over a horizontal line.

Dave McClure
Executive Director
Bristol Bay Housing Authority

Cc: Heather Arnett, AAHA Statewide Administrator



Tlingit-Haida Regional Housing Authority

P.O. Box 32237 • Juneau, Alaska 99803 • Fax (907) 780-6895 • Tel (907) 780-6868

January 23, 2011

Bryce Edgmon
Representative District 37
Alaska State Capitol, Room 416
Juneau, AK 99801

Re: Proposed Revisions to Sec. 18.56.810
Senior Citizens Housing Development

Dear Representative Edgmon,

It is my understanding that your office has agreed to sponsor legislation that will request a statutory amendment to allow Alaska housing authorities as eligible entity to apply for the AHFC Senior Citizens Housing Development Fund Program (SCHDF).

We thank you for sponsoring legislation that will allow Alaska regional housing authorities to apply for the SCHDF program as a resource to address increasing senior housing needs throughout the state and especially Alaska rural communities.

Tlingit Haida Regional Housing Authority is a member of the Association of Alaska Housing Authorities (AAHA). We strongly support the proposal by AAHA to add regional housing authorities, as defined under AS 18.55.996, to the specified eligible entities that are eligible to apply for and receive SCHDF funds.

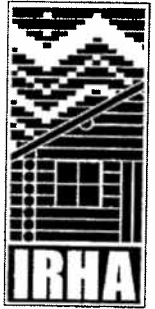
If you have any questions or need my support with your efforts, please feel free to contact me at 907-780-6868.

Sincerely,

Dr. Blake Kazama
President and CEO
Tlingit Haida Regional Housing Authority

cc: Heather Arnett, AAHA Statewide Administrator

INTERIOR REGIONAL HOUSING AUTHORITY



January 5, 2011

Rep. Bryce Edgmon
Alaska State Capitol, Room 416
Juneau, AK 99801

Dear Rep. Edgmon:

RE: Proposed Revisions to Sec. 18.56.810 Senior Citizens Housing Development.

I am writing on behalf of the Interior Regional Housing Authority, one of 14 state chartered regional housing authorities who are members of the Association of Alaska Housing Authorities (AAHA). We offer our support for a proposed statutory amendment which would provide for the direct eligibility of Alaska housing authorities under the AHFC Senior Citizens Housing Development Program.

The program among others was created to provide funding to assist organizations attempting to develop senior citizen housing. The acquisition, rehabilitation, accessibility modification and new construction of senior housing as well as pre-development activities are all eligible for grant awards. What should be a relatively straightforward process is complicated by the fact that, regional housing authorities are hampered by a technicality. The need for senior housing is a need that we hear about on a continual basis.

Although Alaska's regional housing authorities are some of the most experienced and qualified housing developers in the state, current statutory language limits program eligibility to municipalities or public or private nonprofit corporations designated as tax exempt under 26 U.S.C. 501©(3) and (4) (Internal Revenue Code of 1954). Regional housing authorities do not meet this technical definition and are thus unable to directly access this particular program as a resource to address increasing senior housing needs throughout the state without having to jump through a lot of hoops.. The Interior Regional Housing Authority strongly supports the proposal by AAHA to add regional housing authorities, as defined under AS 18.55.996, to the specified eligible entities which can apply for and receive these funds.

It is our understanding that your office has agreed to sponsor legislation which would provide for the requested statutory change. We very much appreciate your efforts to assist in this matter. If there is anything further we can do to help in your efforts, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Irene Catalone", is written over a horizontal line.

Irene Catalone
CEO