

## GOAL QAP 2027 Changes: Comments and Responses

Updated June 9, 2026

### Comment Period April 17, 2026 – May 15, 2026

#### 1.) **Project Characteristics**

We request that AHFC create a new scoring criterion that would award points to applications sponsored by a Tribal government, Tribally Designated Housing Entity (“TDHE”), or Tribal corporation under ANCSA whose project’s purpose is to serve tribal members. Many of the scoring commitments provided by AHFC are in contradiction to the structure of tribal tax credit transactions. **We request that AHFC recognize the unique complexities tribal projects face and award specific points to those types of projects that support the Alaska Native population, a substantial portion of the state’s inhabitants.** We ask that there be a requirement under this new scoring category, if adopted, that the project is both tribally sponsored and intended to serve tribal members. However, we request that the category is site neutral. Meaning, we ask that AHFC recognize tribal projects across trust land, fee land, and ANCSA held properties.

*An identical comment was received and responded to in the SFY 2026 and January 2027 QAP revisions.*

#### 2.) **Market Conditions**

This scoring category currently makes up almost 20% of the total possible points in the application. Yet the requirements to receive points in this category are greatly outside of a developer’s control and disproportionately hurt tribal projects. A private developer can seek project sites that score well in a specific market area and maximize scoring in this category. A Tribe simply cannot do that. A Tribe has a specific service area and land base. **Tribes cannot seek out fee land outside of that area to pick up these large numbers of market conditions points.** Therefore, as a static developer, they are at a unique disadvantage under this category. We request that the number of points under this category be significantly reduced or that tribal projects be given these points in full. Based on feedback from our Alaska clients, we believe that tribal populations in urban areas are undercounted and the Matanuska-Susitna Borough is a prime example. The Borough is the second largest in the state and is growing rapidly. Between 2020 and 2024 (4 years), the census noted an increase of over 10,000 people in the Borough. Using the same census data from 2000 and 2020 (20 years), shows an increase in the Alaska Native population of approximately 3,600 with a current population of approximately 6,200. **The Knik Tribe, which is located in the Mat-Su Borough, tells a different story. They estimate that in the last ten years alone, the size of the Native community in the Mat-Su Borough has grown to as many as 13,500 individuals.** Support for this number comes from several places, including the enrollment at the Benteh Nuutah Clinic, operated by the Southcentral Foundation in Knik’s Tribal Service Area, which is now over 13,000. This number only represents a portion of the population that wishes to receive healthcare services at this facility. An additional supporting source of the population growth is the establishment of an Alaska Native charter school in 2022 by the Matanuska-Susitna Borough School District because of the growing demand for this type of school and a substantial population to sustain the initiative. The school supports up to 300 in-person students and an additional 300 homeschool students. That number continues to grow rapidly as Alaska Native communities migrate from other regions of the state because remote areas have high energy costs, limited employment and housing, or because of impacts from climate change such as melting permafrost and natural disasters like the recent typhoon that tore through eastern Alaska. These natural disasters overwhelmingly impact Alaska Native

communities, which are less likely to be rebuilt or restored when they occur, requiring people to migrate to more urban locations. The Knik Tribe is expecting several hundred Alaska Natives to relocate to the Mat-Su Borough in the coming months due to the typhoon. Many of those individuals will move in with relatives and friends. Alaska Native communities allow these migrating families to move into their homes, leading to significant overcrowding. According to the National Low Income Housing Coalition's 2024 report, a third of Native Families in Tribal lands in Alaska live in homes that are overcrowded with as many as three or four families living in two- or three-bedroom homes.<sup>1</sup> These additional families are rarely counted in census reporting, leading to underreporting for the entire region. If, for example, 100 homes in the Knik Tribe's region have an additional five to ten people living in them, then that means that approximately five to ten thousand people are not included in this census data. That has a significant impact on the population growth data that AHFC uses in the scoring category. We feel strongly about this because overcrowded homes have a larger impact than just wear and tear on a housing structure. It serves to perpetuate the societal ills that plague many tribal reservations: drug and alcohol abuse, physical abuse, suicide, depression and other mental illnesses, diabetes, obesity, and generational poverty. For example, HUD's 2017 Summary Statement on the Native American Housing and Self Determination Act (NAHASDA) program states, "Overcrowding has negative effects on a family's health, especially children's health, and tends to exacerbate domestic violence, truancy, and poor performance in school. Homes suffer more wear and tear when they are overcrowded, and the use of appliances coupled with poor ventilation can lead to conditions that promote mold growth." The Native Alaskan community living within urban centers such as the Mat-Su Borough is most definitely growing in size. We ask that AHFC take this into consideration for Tribal applications that serve this very specific, undercounted population that migrant from rural parts of the state. Additionally, this scoring category makes a successful LIHTC application incredibly difficult for rural, Alaska Native communities. **Alaska is home to 40% of the nation's federally recognized Tribes, and 15.6% of Alaska's population**, according to the U.S. census, identifies as Alaskan Native or Native American. **Approximately half of this sizable population resides in villages across rural Alaska.** The Opportunity and Location subcategories within this section are highly problematic for these communities when competing for a LIHTC award. These categories ask Alaska Natives to compete in a way that is irrelevant, and arguably in opposition, to their way of living. National Low Income Housing Coalition, "Housing Needs on Native American and Alaska Native Tribal Lands," 2024, [hBps://nlihc.org/sites/default/files/Na\\$ve-Housing-2024.pdf](https://nlihc.org/sites/default/files/Na%26ve-Housing-2024.pdf).

Rural Alaska is the ancestral homelands where native communities have resided for millennia. They encompass vast territories characterized by rich Indigenous cultures, deep subsistence traditions, and unique village life. Located far from major metropolitan areas, often only accessible by air or boat, these rural regions have received minimal economic or infrastructural investment from the government or private businesses. This results in limited population growth and leads to high unemployment rates – all of which impact the Market Condition scoring category.

Even with these challenges, these Native Alaskan communities want to remain in their ancestral homelands, but a lack of housing is an incredible barrier to that desire. Homes in rural Alaska are often overcrowded, with many families sharing a single unit, similar to overcrowding in urban areas with the same consequences for the home and the families residing within. A report by the Association of Alaska Housing Authorities stated that "The rate of overcrowding, or severe overcrowding, is such that Alaska needs more than 16,100 housing units to alleviate overcrowding. The rates of overcrowding in every region of Alaska are higher than the rest of the United States....Anecdotally, it is common for RHAs to hear of 15-18 people residing in a 1,200 square foot house."<sup>2</sup> Only two projects have received funding in the Interior

and Far North regions in the last decade, leaving tribal communities with minimal support to address the overcrowding, aging housing in rural Alaska that limits population growth and other investments. Given the level of Native representation in Alaska, **Travois is requesting additional considerations in the new QAP that will recognize and support tribal affordable housing projects in rural, small Alaska villages.**

*A nearly identical comment was received and responded to in the SFY 2026 and January 2027 QAP revisions.*

**3.) Underwriting – Hard Debt** Like Market Conditions, this scoring category has a large percentage of points and is problematic for tribal projects. Tribal projects across the country are typically structured in the same way and are financed with only two sources: 1) A soft debt, cash-flow-only loan from a Tribe or Tribal housing entity, and 2) Investor equity from the sale of the tax credits. This scoring category pushes projects towards taking on real debt. The traditional soft debt structure allows tribal entities to keep rents affordable for low-income tribal members, which is the entire goal of tribal developers. We request that the hard debt test be removed as a scoring consideration or that **soft debt be recognized within this scoring category.**

*A nearly identical comment was received and responded to in the SFY 2026 and January 2027 QAP revisions.*

#### **4.) Project Team Characteristics**

**Travois would like to request that Tribes and TDHE be specifically added as recognized tax-exempt organizations under the Project Team Characteristics category.** The IRS regards the status of Tribes and Tribal entities under the Indian Tribal Governmental Tax Status Act, codified as Section 7871 of the Internal Revenue Code. Because of this, Tribes and Tribal entities are equivalent to non-profit corporations or institutions.

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