

AHFA 2021 Draft HOME Action Plan, Low-Income Housing Credit Qualified Allocation Plan,
and National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period July 2, 2020 – August 20, 2020

All comments regarding the Draft Plans must be submitted using this form. General Comments may be submitted at the bottom of the form. **Comments which include cut-and paste text (or redlined/re-worded sections) of the proposed Plans will be rejected.** AHFA will not respond (or seek to interpret) to suggested change in language without a complete explanation of the suggested language change. Please provide full explanatory and careful comments regarding your proposed changes, keeping in mind that your proposed changes might have an unintended consequence for a different project or location in the state. All forms should be submitted to ahfa.mf.qap@ahfa.com as an attachment to the email. Other documentation, e.g., product information or photos, may also be submitted. All comments will be posted at www.ahfa.com for review.

8/20/2020

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	II	11	Respectfully request that AHFA require all rehabilitation projects to undergo a pre-rehabilitation energy analysis and energy audit to identify and install cost-effective energy upgrades. While it is justifiable to keep up-front development costs low, this can lead to higher utility, maintenance, and health expenses over time. Using proven methods to select cost-effective efficiency upgrades encourages responsible investment and lowers cost of ownership.
Housing Credit	Point Scoring	A-5	Respectfully request alternative option to receive all 8 available points for new construction projects that certify to ENERGY STAR Version 3 or National Green Building Standard (NGBS). These third-party certification programs offer proven, cost-effective ways to lower residents' and property owner's bills, reduce unit turnover and provide healthier, more comfortable homes for residents. Currently, 41 state housing finance agencies have determined that whole building energy and sustainable building programs, like ENERGY STAR and NGBS, are a prudent use of Housing Credits and have included them in their QAPs. Additionally, by including these programs in Alabama's QAP, AHFA will create a level playing field for developers, as their projects must currently comply with different energy codes in different jurisdictions.
Housing Credit	DQS	C-1	Respectfully request Design Quality Standards and Construction Manual, Section I, Introduction be updated to align with the Alabama Department of Economic and Community Affairs (ADECA) adoption of the 2015 International Energy Conservation Code (IECC), with amendments, and the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2013, which has been effective since October 1, 2016. Residential building codes adopted by the state should apply to projects that receive low-income housing tax credits.

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