

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](mailto: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](http://www.ahfa.com) for review.

8/20/2020

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Plan Section	Section Reference	Page #	Specific Comments
Plan	Compliance	General Comment	<p>The Alabama Department of Economic and Community Affairs (ADECA) has adopted the 2015 International Energy Conservation Code (IECC), with amendments and the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2013. We respectfully request that the Design Quality Standards and Construction Manual, Section I Introduction energy code reference be updated to align with ADECA's adoption. Please see this link for additional information regarding ADECA's energy code adoption:  <a href="https://adeca.alabama.gov/Divisions/energy/energycodes/Pages/default.aspx">https://adeca.alabama.gov/Divisions/energy/energycodes/Pages/default.aspx</a></p>
Plan	II	Allocation Process	<p>First, we would like to thank AHFA for the opportunity to provide feedback on AHFA's Draft 2021 QAP. We appreciate AHFA's collaborative and inclusive approach and respectfully offer the following comments and recommendations.</p> <p>We request that AHFA require all new construction projects to certify to ENERGY STAR's Residential New Construction program, and for rehabilitation projects to undergo a pre-rehabilitation energy analysis and energy audit to identify and install cost-effective energy upgrades. We acknowledge that AHFA, like many state Housing Finance Agencies, justifiably wants to minimize up-front development costs associated with Housing Credits. However, affordable housing residents should not bear the burden of costly utilities and uncomfortable housing. They should be able to pay their rent and energy bills and still be able to put food on the table.</p> <p>Whole building energy programs, like ENERGY STAR, are proven to be a cost-effective way to lower residents' and</p>

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			<p>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 green building programs are a prudent use of Housing Credits and have included them in their QAPs. Additionally, by including a whole building energy program in Alabama's QAP, AHFA would also create a level playing field for developers, as their projects must currently comply with different energy codes in different jurisdictions.</p> <p>In addition to the mandatory requirement for ENERGY STAR certification, we request that AHFA offer competitive threshold points for new construction and renovation projects that certify to the ICC-700 National Green Building Standard (NGBS). Green building certification to a credible third-party program would offer AHFA greater assurance of construction quality, operational efficiency, and resident comfort. While energy efficiency is the cornerstone of any sustainable building policy, energy efficiency requirements alone are not enough to promote sustainable development.</p> <p>The NGBS's credibility as a green building rating system is unassailable given it carries ANSI approval as an American National Standard, as well as approval as an ASHRAE Standard and an ICC Standard. No other green building rating system or certification program in the country can match the NGBS's credibility in that regard, and thus AHFA can be assured that the NGBS is a true consensus-based standard, developed by a balance of stakeholders, rigorous in its compliance requirements, that has undergone the scrutiny of extensive public review and comment. The NGBS was specifically designed for residential projects including affordable housing, and is cost-effective to implement, making it ideally suited for low-income housing programs to meet their goal of increasing the construction or renovation of green housing in a cost-conscious manner. The NGBS is currently recognized in 24 state Qualified Allocation Plans for low income housing tax credits and innumerable federal, state, and local affordable housing programs.</p> <p>We appreciate your consideration on these matters.</p>
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