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

Name: Kandice Allen Mitchell Organization: Enterprise Community Partners Email:

kamitchell@enterprisecommunity.org Phone: 4046984615

Plan Section	Section Reference	Page #	Specific Comments
Housing Credit		11	We would first 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. 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 prerehabilitation 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.
			Whole building energy programs, like ENERGY STAR, are proven to be a cost-effective way 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 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.
Housing Credit	DQS	C-2	The Alabama Department of Economic and Community Affairs (ADECA) has adopted the 2015 International Energy Conservation Code (IECC), with amendments and the

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Housing Credit	Point Scoring	A-5	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: https://adeca.alabama.gov/Divisions/energy/energycodes/Pages/default.aspx [nam11.safelinks.protection.outlook.com] We'd first like to recognize your commitment to preserving the existing affordable stock by strengthening the language around the extended use period in the 2020 QAP. However, even with those changes, Qualified Contracts continue to offer a loophole for Housing Credit properties to convert to market rate. We strongly recommend that the AHFA incorporate a points incentive for waiving the right to a Qualified Contract for the duration of the extended use period. Our recommended incentive is in addition to the existing threshold requirement for the extended use period. Awarding points for the full waiver of the Qualified Contract will help to mitigate the premature loss of Housing Credit properties so that affordability is preserved.
Plan	Section		
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