

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.gap@ahfa.com](mailto:ahfa.mf.gap@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

Name: Russell Bennett Organization: Low Income Housing Coalition of Alabama Email: rusty@collaborative-solutions.net Phone: 205-939-0411

Plan Section	Section Reference	Page #	Specific Comments
General Comment	Section		<p>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.</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 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>We appreciate your consideration on this matter.</p>

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General Comment	Section		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>
HOME	III	8	LIHCA recommends that AHFA consider reducing the application fee for projects that want to develop a 100% permanent supportive housing project.
HOME	IV	23	LIHCA recommends that AHFA not penalize projects that have higher than average per unit costs if the proposed project is incorporating green building techniques above and beyond the requirements of the QAP. Green building materials or techniques may have a higher per unit cost. Give that Alabama could benefit from more projects that incorporate green building, we ask that AHFA not disincentivize developers from incorporating green building into their projects.
HOME	Point Scoring	A-5	LIHCA applauds and appreciates the energy and water conservation incentives in the QAP. We recommend that AHFA further incentivize developers to incorporate additional design elements that support green practices and/or healthy living, which could include additional points (10 point maximum instead of 8 point maximum) for projects that can achieve a certification from Enterprise's Green Criteria, LEED, or other green building certification.
HTF	Section	3	LIHCA recommends that AHFA include acquisition and rehabilitation in addition to new construction as eligible activities under the National Housing Trust Fund. Reason: Alabama has a significant number of existing vacant units, both single- and multifamily that are in need of repairs. Allowing grantees to acquire and rehabilitate properties for affordable rental housing will not only work towards AHFA's goal of creating housing opportunities for individuals and families that are homeless or at risk of homelessness, but will also retain existing housing inventory and eliminate blight in communities.
HTF	Section		
Plan	Section		
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