

AHFA 2022 Draft Low-Income Housing Credit Qualified Allocation Plan, HOME Action Plan,
and National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period July 28, 2021 – August 27, 2021

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 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.

8/16/2021

Name: Alysso Blackwelder Organization: U.S. Green Building Council Email: ablackwelder@usgbc.org Phone: 703-981-1768

Plan Section	Section Reference	Page #	Specific Comments
Plan	Compliance	N/A	<p>The U.S. Green Building Council respectfully requests 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, 42 state/local 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 the different jurisdictions where they build.</p> <p>While energy efficiency is the cornerstone of any sustainable building policy, energy efficiency requirements alone are not enough to promote sustainable development. Green building certification to a credible third-party program would offer AHFA even greater assurance of construction quality,</p>

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		<p>operational efficiency, and resident comfort. In addition to the mandatory requirement for ENERGY STAR certification, we request that AHFA offer competitive points for new construction and renovation projects that certify to the EarthCraft, Enterprise Green Communities, LEED, or NGBS Green.</p> <p>The Alabama development community is equipped to implement increased energy efficiency and green building requirements. Statewide, there are nearly 1,000 ENERGY STAR single-family homes and apartments. There are also over 200 multifamily buildings that have been certified to LEED and NGBS Green. These statistics signal that the local building industry is familiar with green building practices and third-party certification processes.</p> <p>Affordable builders and developers working in Alabama not only construct energy-efficient homes and buildings; some are constructing net zero and passive buildings that are designed to offer huge energy savings when compared to typical code-built construction, and, as a result, have minimal utility costs. An example is Auburn University Rural Studio's House 66, which was the first home in Alabama to receive PHIUS+ certification and the first ever to be certified to both PHIUS and FORTIFIED—a standard that certifies a home's construction strengthens it against severe weather. While the home features exceptional energy efficient features, the modest 2-bedroom apartment was affordably built by design students for Auburn Opelika Habitat for Humanity. (For more information: https://www.phius.org/projects/1529)</p> <p>Green certified buildings in Alabama are diverse, spanning the range of affordability and construction styles. One example of green certified buildings in Alabama is Dauphin Gate Apartments, a garden-style apartment community in Mobile, Ala. that underwent a moderate rehabilitation project by the Wishrock Group. This project was financed by tax-exempt bonds, a HUD loan, and 4% Low-Income Housing Tax Credit equity. (For more information: http://wishrockgroup.com/projects/dauphin-gate/) Another example is The Venue at the Ballpark, an amenity-rich market-rate luxury apartment building serving the University of Alabama and nearby medical and professional centers in Birmingham. (For more information: https://venueballpark.com/)</p>
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