

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.

8/27/2021

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Point Scoring	A-5	Respectfully request that AHFA offer competitive points for projects that certify to ENERGY STAR's Residential New Construction program, DOE Zero Energy Ready Home, National Green Building Standard (NGBS), and/or Enterprise Green Communities. Alabamians value responsible use of tax dollars, conservation, and helping those in need. These third-party certifications provide a quality assurance process that increases ROI by reducing callbacks, lowering energy bills, and improving durability, comfort, and indoor air quality. Resource waste is measurably reduced and residents who are struggling financially can get back on their feet.
Housing Credit	II	14	Respectfully request that all rehabilitation projects undergo a pre-rehabilitation energy assessment to select cost-effective energy upgrades. Looking solely at upfront costs externalizes and/or delays realization of the true cost, which often falls on taxpayers one way or another. Using proven methods to select these upgrades encourages responsible investment and lowers cost of ownership.
Housing Credit	DQS	C-1	Respectfully request that the "Design Quality Standards and Construction Manual, Section I, Introduction" energy code reference be updated to align with ADECA's adoption of the 2015 IECC with amendments ("2015 Alabama Residential Energy Code") and ASHRAE 90.1-2013 ("2015 Alabama Commercial Energy Code"), which have been in effect since October 2016.
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