

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.

Select Date Submitted

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	II	11	<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>Southface Institute, a nonprofit 501(c)(3) organization, is a leader in sustainable advocacy, building, planning and operations across the U.S. With a mission to create a healthy and equitably built environment for all, Southface’s programs, consulting services, workforce development, research and policy practices are supporting better homes, workplaces and communities. As experts in the fields of resource efficiency, building technology and organizational sustainability since 1978, Southface is committed to building a regenerative economy that meets tomorrow’s needs today.</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 and protect the public investment. However, affordable housing residents should not bear the burden of costly utilities and uncomfortable or unhealthy housing. Residents 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 owners' bills, reduce unit turnover and provide healthier, more comfortable homes for residents.</p> <p>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>
Housing Credit	Point Scoring	29	<p>In addition to our request that AHFA require all new construction projects to certify to ENERGY STAR's Residential New Construction program, we advise AHFA to consider including green building certification programs, such as EarthCraft, Enterprise Green Communities, LEED and National Green Building Standard, as options for additional points.</p> <p>Awarding points for green building standards incentivizes the production of healthy, quality, energy and water efficient buildings. Residences built to these standards result in an improved quality of life for residents through the provision of healthier and more affordable housing. Green building standards not only ensure quality housing and lower utility bills; they also serve as an additional, third-party quality assurance check on building design, construction and operations. This benefits both residents of these properties and the AHFA by serving as an independent verification of the safety, health and quality of the end product.</p> <p>An increase in the attainment of green building certifications for properties and builders also supports an overall decrease in housing costs for residents that results in greater total affordability. Greater total affordability means that residents are less likely to face difficult financial choices like the choice between paying rent, putting food on the table, and meeting medical needs. Affordability does not only refer to the sale price of a home or rent for an apartment, but to total affordability, which includes access to resources and services (e.g., employment, food, education, healthcare, utilities), a healthy environment with minimized emissions and pollutants, location efficiency (e.g., access to multi-modal transportation), quality housing, stability of housing (e.g., renter protections) and low cost burdens. All of these elements work together, influence each other and are</p>

