

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.

8/24/2021

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Plan Section	Section Reference	Page #	Specific Comments
General Comment	Compliance	N/A	<p>Energy Alabama requests that AHFA require all new construction projects to certify to at least 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. ENERGY STAR, by its very definition, is cost-effective and returns more savings than any potential increase in construction costs. The U.S. Department of Energy does not award ENERGY STAR certification to any device, appliance, or building that cannot demonstrate cost-effectiveness.</p> <p>We understand that AHFA justifiably wants to minimize up-front development costs associated with housing credits. However, such a focus cannot be at the expense of eventual residents. After all, the intent of affordable housing is to reduce poverty, not shift the burden from one bill to the next.</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 and 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. Even the State of Mississippi has been able to find a way forward to increase energy efficiency and reduce costs for residents.</p> <p>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</p>

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			<p>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, operational efficiency, and resident comfort. In addition to the mandatory requirement for ENERGY STAR certification, we request that AHFA offer competitive and optional points for new construction and renovation projects that certify to the EarthCraft, Enterprise Green Communities, LEED, or NGBS Green. To be clear, Energy Alabama is not advocating to mandate any certification beyond ENERGY STAR. Energy Alabama simply believes that developers should have the ability to earn more credit for going above and beyond. Developers who want to build more sustainably should get credit for their good deeds, not punishment.</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>Energy Alabama welcomes the opportunity to discuss these recommendations and third-party programs further with you or your staff. We are available to provide substantial information to help Alabama improve. We look forward to working with AHFA to promote energy efficient and sustainable affordable housing in Alabama that considers resident needs after construction as much as it does upfront construction cost.</p>
General Comment	Compliance	C-1	<p>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.</p> <p>AHFA's Design Quality Standards and Construction Manual, Section I Introduction energy code references should be updated to align with the law in Alabama. AHFA's references</p>

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			to older, out of date codes do not remove the responsibility of any developer or builder from complying with the law. For more information regarding ADECA's energy code adoption: https://adeca.alabama.gov/Divisions/energy/energycodes/Pages/default.aspx
General Comment	DQS	III-A-3 IV-B-2	<p>Electric vehicle chargers should be mandatory on all new construction at a rate of no less than 10% of all new parking spaces.</p> <p>Alabama is home to a growing number of electric vehicles (EVs) and automotive manufacturers with aggressive goals to expand their electric offerings. GM has committed to go all electric by 2035, Volvo by 2030, and various other manufacturers targeting significant expansion of EVs within the next ten years.</p> <p>EVs reduce harmful emissions and much less costly to fuel and operate than traditional vehicles. Combined with the movement of the industry, EVs will soon become as ubiquitous as parking itself and should be included. EVs and their infrastructure should be available to residents of all income level.</p>
General Comment	DQS	III-A-4 IV-C-2	Energy Alabama appreciates the use of an R-38 minimum for attic insulation which provides for improved energy efficiency and comfort.
General Comment	DQS	III-A-5 IV-C-7	<p>All water heaters should be ENERGY STAR-rated heat pump water heaters. Heat pump water heaters have slightly higher upfront costs but can reduce energy consumption by as much \$500 per year for a 50-gallon tank, paying for itself in about three years or less.</p> <p>As stated above, ENERGY STAR, by its very definition, is cost-effective and returns more savings than any potential increase in construction costs. The U.S. Department of Energy does not award ENERGY STAR certification to any device, appliance, or building that cannot demonstrate cost-effectiveness.</p>
General Comment	DQS	III-A-5 IV-C-7	All HVAC equipment should be ENERGY STAR-rated, not specified by SEER, HSPF, or AFUE ratings, and the duct work should be sealed to meet the current statewide energy code. Using ENERGY STAR-ratings and the prevailing statewide energy codes helps to future proof AHFA's DQS as the ENERGY STAR program and the State of Alabama's energy codes continually change as technology improves and market conditions dictate.

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