

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	II	11	<p>We respectfully 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, 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, operational efficiency, and resident comfort. In addition to the</p>

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			<p>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 green building standards. These statistics signal that the local building industry is familiar with green building practices and third-party certification processes.</p> <p>Green certified buildings in Alabama are diverse, spanning the range of affordability and construction styles. One example of an Enterprise Green Communities certified project in Alabama is Dauphin Gate Apartments, a garden-style apartment community in Mobile, Alabama that underwent a moderate rehabilitation project by the Wishrock Group. This project was financed by tax-exempt bonds, a HUD loan, and 4 percent Housing Credit. (For more information: http://wishrockgroup.com/projects/dauphin-gate/) In addition, the Old Monrovia Apartments, a new construction project in Huntsville, is currently pursuing Enterprise Green Communities certification. We would be more than willing to share additional details on either project.</p> <p>We welcome the opportunity to discuss these recommendations and third-party programs further with you or your staff, and I will gladly provide any supplemental information that may be beneficial. We look forward to working with AHFA to promote energy efficient and green affordable housing in Alabama!</p>
Housing Credit	DQS	C2	<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. 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:</p>

