

AHFA 2017 Draft Low-Income Housing Credit Qualified Allocation and HOME Action Plans
Public Comment Form
Commenting Period October 11, 2016 – November 10, 2016

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. Upon close of the commenting period, all comments will be posted at www.ahfa.com for review.

10/31/2016

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Plan Section	Section Reference	Page #	Specific Comments
Plan	Add A - Point Scoring	3	We recommend section 1.i.a require ENERGY STAR rated washing machines. Futhermore we recommend the use of electricity over natural gas or propane because electricity can become cleaner over time as the grid uses cleaner fuel sources or renewables are introduced on-site.
Plan	Add A - Point Scoring	3	We recommend section 1.i.a require all computers and related equipment, such as printers, scanners etc., in a computer center be ENERGY STAR rated. ENERGY STAR is widely recognized to be the most life cycle cost effective option on the market.
Plan	Add A - Point Scoring	3	We recommend section 1.i.a require any property installing a Splash Center filter and reuse the water in order to reduce water consumption and reduce the financial impact of the Splash Center on the property.
Plan	Add A - Point Scoring	5	We recommend section 1.i.c.g only provide points to properties replacing HVAC equipment with ENERGY STAR rated equipment. ENERGY STAR is widely recognized to be the most life cycle cost effective option on the market.
Plan	Add A - Point Scoring	5	We recommend section 1.ii.a require 16 SEER and 9.0 HSPF in order to achieve 4 points.
Plan	Add A - Point Scoring	5	We recommend section 1.ii.b only provide 1 point for achievement.
Plan	Add A - Point Scoring	5	We recommend section 1.ii.c only provide 1 point for achievement.
Plan	Add A - Point Scoring	5	We recommend section 1.ii.d only provide 3 points for achievement.
General Comment	Add A - Point Scoring	5	We have recommended the changes above to sections 1.ii based on the effort and cost required in relation to the energy savings achieved for that measure.
General Comment	Add A - Point Scoring	5	Section 1.iii as written is unclear if the Alabama Housing Finance Authority and/or a third party will inspect each property or if they simply reserve the right to do so. We

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			recommend clarifying this section to state each property will be inspected.
Plan	Add A - Point Scoring	8	We recommend section 1.viii.a.1 provide 2 points for 0.5 mile or less walkability to the listed services in the section.
General Comment	Add A - Point Scoring	N/A	<p>We recommend the addition of extra points for the following measures:</p> <ol style="list-style-type: none"> 1. 2 points for the use of Alabama-based products for at least 25% of the materials required. 2. 1 point for the use of low maintenance and low water native landscaping. 3. 3 points for the use of passive solar techniques such as the use of deciduous vegetation and awnings. 4. 2 points for the use of variable speed HVAC compressors and air handlers 5. 3 points for an air tightness rating of 3 air changes per hour or lower with the use of mechanical ventilation strategies. <p>The above recommendations have been made based on the level of energy and water savings that can be achieved in relation to the effort and cost required.</p>
Plan	Add C - DQS	7	We recommend section III.3.a.7 be amended to add an exception for sprayfoamed attics otherwise known as encapsulated attics. Standard practice for sprayfoamed attics is not to vent them which would reduce their effectiveness.
Plan	Add C - DQS	8	We recommend section III.3.b.9 be amended to require recycling on-site if services are available at the location. Recycling reduces the cost of trash pickup.
Plan	Add C - DQS	9	We recommend section III.5.c.5 be amended to require all LED lighting as this is the most cost effective lighting available.
Plan	Add C - DQS	10	We recommend section III.6.f be amended to require at least 15 SEER HVAC or higher. 15-16 SEER is widely recognized as the most cost effective options considering upfront cost and energy savings achieved.
Plan	Add C - DQS	12	We recommend section IV.6.a.7 be amended to add an exception for spray foamed attics otherwise known as encapsulated attics. Standard practice for sprayfoamed attics is not to vent them which would reduce their effectiveness.
Plan	Add C - DQS	12	We recommend section IV.6.b.9 be amended to require recycling on-site if services are available at the location. Recycling reduces the cost of trash pickup.
Plan	Add C - DQS	13	We recommend section IV.8.c.5 be amended to require all LED lighting as this is the most cost effective lighting available.
Plan	Add C - DQS	15	We recommend section IV.9.e be amended to require at least 15 SEER HVAC or higher. 15-16 SEER is widely recognized as the most cost effective options considering upfront cost and energy savings achieved.

