

To: Community Members

From: Terry Nash Giovannucci, Community Engagement Manager

Date: June 25, 2021



RE: Public Comments received during the public hearing and public comment period with respect to the 2022-2023 Low-Income Housing Tax Credit program Qualified Allocation Plan (QAP)

Background: At its meeting on April 29, 2021, the CHFA Board of Directors authorized a public hearing and associated public comment period to receive stakeholders' views on proposed revisions to the 2022-2023 QAP.

Responses: A summary of all comments received immediately follows this cover memo, which is then followed by submitted written public comments in their entirety. The audio of the recorded public hearing, which took place on May 19, 2021 may be found at www.chfa.org.

Questions, if any, may be directed to Terry Nash Giovannucci, Community Engagement Manager at terry.nash@chfa.org.

To listen to audio recording of public comments go to:
<https://www.chfa.org/about-us/chfa-audio-video-publications/>

May 2021 Public Hearing and Public Comment Period
Summary of Written and Verbal Comments
2022 and 2023 Qualified Allocation Plan (QAP)



	Respondent Company/Name/Title	Written Comment
1	Beacon Communities Dara Kovel, CEO	<ul style="list-style-type: none"> • Suggests that CHFA provide significant points as an incentive for developers to undertake the 8-30g appeals process; • Proposes increasing points for TOD to equate to points in opportunity areas so that cities and suburban locations have equal access to points; • Suggests restoring points for mixed-use developments or “grandfathering” former applicants inclusion of mixed-use • Suggests overhaul of requirements for hybrid deals and proposes tax-counsel verification that hybrid deals are two separate deals in lieu of requirements currently in place; • Supports the new pre-application process and suggests it should be included in the QAP
2	Charter Oak Communities and Rippowam Corporation Jonathan Gottlieb, Vice President	<ul style="list-style-type: none"> • Strongly supports the new 25% set-aside for preservation projects • Urges CHFA to limit access to the new set-aside to existing affordable housing developments with long term deed restrictions, primarily federal public housing and projects in the State Sponsored Housing Portfolio (SSHP). • Recommends that CHFA reduce the points schedule and limit the number of credit awards to projects receiving high opportunity or location preference points of two per funding round. • In ranking preservation proposals, urges CHFA to focus primarily on the scope of work needed, the identification of the project in municipal plans or policies, and the relevant experience of the applicant.
3	Citizen Peter Millman, Resident of Mansfield	<ul style="list-style-type: none"> • Strongly supports the continued inclusion and increased points of the Passive House building standard in the QAP as it is the optimal path to

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	Member of town Sustainability Committee and Eastern CT Green Action	<p>achieve net-zero, and aligns with the state’s ambitious energy goals concerning climate change and state housing</p> <ul style="list-style-type: none"> • Recognizes CHFA for it leadership and listening to feedback
4	<p>Citizen Christine Pattee, Resident of Coventry Member of Coventry’s Planning and Zoning Commission for 15 years and a member of the subcommittee that wrote both the 2010 and the 2020 Plans of Conservation and Development</p>	<ul style="list-style-type: none"> • As a member of the Town Council-sponsored Senior Housing Alternatives Study Committee, which has been examining costs of various types of senior housing, land-use policies and current lack of affordable housing, both low-income and moderate-income, urges consideration of senior housing in rural communities; • Presents data that supports the need for senior age-restricted housing and asks CHFA to consider a change in funding protocols to better the lives of Connecticut’s senior citizens, especially those who live in rural areas.
5	<p>Citizen Adam Raider, Resident of West Hartford</p>	<ul style="list-style-type: none"> • Asks that the proposed 2022-2023 QAP be modified to permit legacy, age-restricted organizations such as West Hartford Fellowship Housing to compete for funding
6	<p>Citizen and Architect George Penniman, AIA, Resident of Essex</p>	<ul style="list-style-type: none"> • Strongly supports the continued inclusion and increased points of the Passive House building standard in the QAP as it is the optimal path to achieve net-zero, and aligns with the state’s ambitious energy goals concerning climate change and state housing • Recognizes CHFA for it leadership and listening to feedback

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<p>7</p> <p>Citizen and Architect Catherine Santos Young, Resident of Middletown</p>	<ul style="list-style-type: none"> • Strongly supports the continued inclusion and increased points of the Passive House building standard in the QAP • Appreciates CHFA’s leadership and that CHFA listened to feedback on the Sustainable Design Measures section that is poised to be in lockstep with the state's climate and housing goals.
<p>8</p> <p>Citizen and Professor Theodore Randall Sawruk, Resident of Middletown</p>	<ul style="list-style-type: none"> • Strongly supports the continued inclusion and increased points of the Passive House building standard in the QAP as it is the optimal path to achieve net-zero, and aligns with the state’s ambitious energy goals concerning climate change and state housing • Recognizes CHFA for it leadership and listening to feedback
<p>9</p> <p>Connecticut Green Bank Bryan Garcia, President and Chief Executive Officer</p>	<ul style="list-style-type: none"> • Commends CHFA for soliciting input from various stakeholders on revisions to the LIHTC-QAP, and specifically recognizes CHFA for its involvement of stakeholders with interest in Sustainable Design • Stands ready to continue to work with CHFA, Department of Housing (“DOH”), U.S. Department of Housing and Urban Development (“HUD”), DEEP, PURA, and others to ensure that vulnerable communities receive the benefits from investments in infrastructure.
<p>10</p> <p>Connecticut Housing Partners Renee Dobos, Chief Executive Officer</p>	<p>Recommends:</p> <ul style="list-style-type: none"> • Removing any scoring that favors one location over another (suburban and urban); • Recognize need for age-restricted senior housing and adjust QAP scoring so that family housing and senior housing are scored the same;

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		<ul style="list-style-type: none"> Supports sustainable design measures but suggests the limits on credit awards means that they are too expensive to implement.
11	Connecticut Passive House Board of Directors Leonard Wyeth AIA Cheryl Dieso AIA George Penniman AIA Sara Holmes AIA Philippe Campus AIA Alicia Dolce Nicholas Jones Katie Troy	<ul style="list-style-type: none"> Strongly supports the final draft of the multi-year 2022-2023 QAP Appreciates the approach to sustainable design measures with an array of choices and greater points incentives
12	Elm City Communities Shenae Draughn, Interim President	<ul style="list-style-type: none"> Strongly opposes removal of public housing classification; Opposes weight of points awarded developments in “opportunity areas” as it disadvantages cities such as New Haven
13	Home Innovation Research Labs Michael Luzier, President and CEO	<ul style="list-style-type: none"> Praises the expanded Sustainable Design criteria that incorporates new options for renewables, electrification, and resiliency. Recommendation that CHFA require evidence of third-party certification for all the recognized energy and green building programs, rather than rely on reports from the project’s consultants and engineers. For New Construction, request that the point values for Tier 1 and Tier 2 Green Building options be increased to 4 points and 7 points, respectively, to better reflect the comprehensive nature and higher

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		energy performance of the green building programs.
14	International Living Future Institute Kathleen Smith, Director	<ul style="list-style-type: none"> Strongly supports the sustainability measures that have been proposed for the 2022-2023 QAP and appreciates CHFA's leadership in adopting these measures
15	Keith Boroson Architects Keith Boroson, AIA, Principal	<ul style="list-style-type: none"> Strongly supports the continued inclusion and increased points of the Passive House building standard in the QAP as it is the optimal path to achieve net-zero, and aligns with the state's ambitious energy goals concerning climate change and state housing Recognizes CHFA for its leadership and listening to feedback
16	LISC Connecticut James Horan, Executive Director	<ul style="list-style-type: none"> Supports new classification structure recognizing the differences between preservation and new construction proposals Supports addition of points for proximity to amenities and suggests greater points awarded for amenities within 1-mile (a reasonable walking distance); Urges CHFA to build a robust pre-application that identifies and guides projects that are at an early stage and not ready for competitive review to avoid the high cost of unsuccessful application submission Remove point for 90% plans and specifications Applauds CHFA's continued two-point incentive for development entities that meet the State's definition of an MBE and suggests increased points for specific participatory roles Suggests that CHFA implement a smoke-free housing policy.

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17	MaGrann Associates Peter Harding, Vice President	<ul style="list-style-type: none"> • Applauds the innovative revisions especially the two-year QAP which provides welcome stability for developers planning new projects and the new classifications of preservation and new construction. • Additionally applauds the increase in points for New Construction sustainable design measures and the adoption of the menu approach in Exhibit A-2 that allows developers greater flexibility to choose the most appropriate sustainability measures to incorporate into their project. • Offers technical points of clarification from the perspective of the energy consultant and suggests alternative language
18	New Ecology, Inc. Edward Connelly, President	<ul style="list-style-type: none"> • Applauds the commitment to energy efficiency and sustainable design and offers technical and aspirational revisions for sustainable design measures for both new construction and preservation.
19	Partnership for Strong Communities Sean Ghio, Policy Director	<ul style="list-style-type: none"> • Appreciates the preservation and new construction classifications given the differing needs of each project type; • Appreciates the increased incentives for the lowest-income households unit production • Recommends expanding affordable housing in areas of opportunity and preserving existing affordable housing in areas of community revitalization • Recommends further incentivizing true mixed-income development • Consider ways to expand the pool of applicants, remove incentives for 90% drawings, years of experience and zoning as a threshold
20	Pennrose Charlie Adams	<ul style="list-style-type: none"> • Opposes the new opportunity map as it effectively boosts the competitiveness of suburban development

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		<p>at the expense of urban projects and creates a situation where urban sites may be completely uncompetitive for credits; it fails to encourage “smart growth” principles</p> <ul style="list-style-type: none"> • Striking a more even balance between points allocated to the new Opportunity Map and points for amenities offered by better-connected, smart growth urban sites like TOD and “WalkScores”. • Rework the Opportunity Map to include access to local jobs and higher education, walkable access to amenities like parks and grocery stores, and reliable multi-modal transportation, or • Create a set-aside for 1-2 “High Opportunity” deals each round • Consider “grand-fathering” multi-phase developments so that an urban location is not penalized in a QAP that favors non-urban areas
21	Phius Isaac Elnecave, Policy Specialist	<ul style="list-style-type: none"> • Phius strongly supports the amendments to the Sustainable Design Measures: New Construction section • Suggests minor changes to the sustainable design measures under (1) New Construction and (2) Preservation
22	Schadler Selnau Associates, PC Paul Selnau, Principal,	<ul style="list-style-type: none"> • Fully supports the revisions to the Sustainable Design measures and thanks CHFA for its commitment to affordability and sustainability in housing production
23	State Representative Jillian Gilchrest, 18th Assembly District	<ul style="list-style-type: none"> • Supports revising section 4.b to enable legacy, age-restricted, existing affordable housing programs from nonprofits to qualify for the LIHTC program; • add a provision to section 4.b to award points to projects where the development is part of the preservation of existing units, adds additional housing

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		<p>stock and any resident restrictions, including age-restrictions, are existing and in force as a requirement of the existing housing development.</p> <ul style="list-style-type: none"> Specifically supports West Hartford Fellowship Housing
24	<p>State Senator Derek Slap, 5th Senate District</p>	<ul style="list-style-type: none"> Recommends including language to permit legacy, age-restricted, existing affordable housing run by nonprofit organizations to qualify for the 9% LIHTC program and add a provision to section 4.b that would award points to projects where the development is part of a preservation of existing age-restricted as a requirement of the existing housing development. Specifically supports West Hartford Fellowship Housing
25	<p>The Community Builders Rachana Crowley, Director of Development</p>	<ul style="list-style-type: none"> Strongly supports new classification structure and specific commitment to set-aside for preservation developments Supports proposed tiers and scoring for sustainability and energy efficiency, and also track outcomes on all of these programs to better evaluate the effectiveness of emerging energy efficiency technology Supports the two-year QAP to enable the development community to be able to better implement the state's housing goals through better planning and execution of pipelines Urge consideration of additional changes: <ul style="list-style-type: none"> Encourage senior housing development Partner with DOH on funding 4% LIHTC projects and managing volume cap Implement a cap on opportunity developments Expand Brownfields criteria and go deeper with the TOD points

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	Respondent Company/Name/Title	Written Comment
		<ul style="list-style-type: none"> ○ Provide greater clarity on ranking of Preservation deals and reconsider item #4 in the ranking that prioritizes areas with less than 10% assisted and deed restricted housing ○ Encourage a more flexible and coordinated approach to underwriting and processing of hybrid 9%/4% projects which will make them easier to execute in the state
26	Town of West Hartford Shari Cantor, Mayor	<ul style="list-style-type: none"> ● Asks that CHFA modify its requirements for the 9% LIHTC program to support both family housing developments and redevelopment of legacy, affordable, age-restricted housing developments.
27	West Hartford Fellowship Housing Mark Garilli, Executive Director and Leon Davidoff, President	<ul style="list-style-type: none"> ● Urges adding language to include housing for seniors as well as families so that legacy age-restricted housing development in a location with existing restrictions could earn points and be competitive
28	Winn Development Company LP Adam Stein, Senior Vice President	<ul style="list-style-type: none"> ● Enthusiastically supports changes that have broadened TOD points incentives ● Further suggested revisions include: <ul style="list-style-type: none"> ○ Regarding the 25% Preservation classification set-aside, make clear that 25% is an upper limit rather than a strict target or a minimum ○ Regarding Resident Service Coordinators, focus on services offered, rather than hours provided and offer the same number of points to applicants proposing part-time and full-time on-site resident services coordinators similar to approach of FHLB of Boston ○ Applauds CHFA's commitment to energy efficiency but suggests that CHFA allow an alternative scoring option under "Green Building"

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		<p>only for projects pursuing Passive House certification</p> <ul style="list-style-type: none"> ○ Opposes new opportunity mapping system as it pinpoints variations in opportunity on a highly granular level, emphasizing the differences from one neighborhood to the next, the new scoring mechanism overlooks the opportunities that are consistent across an entire municipality or an entire school district. Suggests “grand-fathering” developments that previously applied and were not awarded.
29	Wyeth Architects Leonard Wyeth, Principal	<ul style="list-style-type: none"> • Strongly supports new multi-year QAP and suggests the best path to energy efficiency is designing to Passive House
30	Wyeth Architects Sara D. Holmes	<ul style="list-style-type: none"> • Strongly support the continued inclusion of, and increased points for, the Passive House building • standard in the Sustainable Design Measures section of the QAP to encourage high quality buildings • Recommends elevating Sustainability as one of the top priorities and offers suggestions for scoring incentives

NOTE: Comments are listed in alphabetical order by respondent’s company or role in the written comments summarized above and the summary of verbal comments that follows.



Two Center Plaza, Suite 700 Boston, MA
02108P: 617.574.1100
BeaconCommunitiesLLC.com

May 28, 2021

Nandini Natarajan
Chief Executive Officer
Connecticut Housing Finance Agency
999 West St #3019
Rocky Hill, CT 06067

Re: Comments to Proposed 2022-2023 QAP

Dear Ms. Natarajan,

Thank you for the issuance of the proposed 2022-2023 Qualified Allocation Plan ("QAP"). We appreciate CHFA's commitment and leadership to address affordable housing solutions across the State of Connecticut. Beacon also remains committed to our Connecticut pipeline and we look forward to pursuing developments that align with the housing needs of the communities in which we work.

We are requesting consideration of changes of the proposed draft in three categories: (1) areas of opportunity, (2) transit-oriented developments, and (3) process concerns, including the pre-application process and hybrid developments. To that end, we offer the following comments as we work with you to create great, affordable places for people to live across Connecticut.

Areas of Opportunity Points and Local Opposition

The land-use appeals process is a significant hurdle when considering providing affordable housing in Areas of Opportunity. In municipalities where there is opposition to affordable housing, developers must undertake significant effort and cost to go through a Section 8-30g appeal process. As you know, we experienced this recently in Branford. Due to this momentous challenge and risk in many desirable communities, we propose that if a developer must go through an 8- 30g process, substantial recognition should be given to these projects. This could be accomplished through a significant point category (10 points) for successful 8-30g projects. Since developers are not pursuing deals in these areas due to increased uncertainty and risk, this change could unlock deals that otherwise would not be worth the investment to move forward.

Transit Oriented Development

Another primary State priority is transit oriented development. However, projects that meet this state objective are at a severe disadvantage in the scoring system. The points for transit-oriented development should be increased reflect the policy priorities of the State. Section the 3b of the scoring system provides a maximum of 4 points for transit-oriented sites. By comparison, there are 15 potential points available to

developments in areas of opportunity (Section 4a and b). This imbalance means that TOD sites cannot compete with Areas of Opportunity. We propose the points for TOD categories be increased to 10 points for *Proximity to Transit* and 5 points for *Proximity to Private/Public Amenities* so that TOD scoring is comparable to the points awarded for an Area of Opportunity project.

Furthermore, we propose points for mixed use projects previously under section 3b be grandfathered in under the Qualified Allocation Plan in order to give the industry time to adjust to the shift in policy of CHFA no longer prioritizing mixed use projects.

Pre-Application Process

We are encouraged by the consideration for a pre-application process for applicants. In neighboring states, this step helps to identify projects best suited to move forward based on readiness and alignment with selection criteria. This process will be particularly important with CHFA's desire to direct rehabilitation projects to the 4% credit when possible. Since the pre-application would serve as a qualifying tool in the overall process for selection, this should be outlined in the QAP.

Hybrid Developments

We appreciate the work that CHFA has done to progress this financing tool. The hybrid financing structure is a good (though complicated and expensive) way to support larger deals, as the twinned 4% project utilizes the so-called "excess basis" created by the cap on 9% credits. Beacon has successfully implemented this structure in Massachusetts. The hybrid structure as proposed includes several unnecessary complexities that would adversely impact the achievable scale of the project, including separate physical features (entrances, signage, stairs, etc.). Other states (including Massachusetts) have successfully implemented 9%/4% hybrid financing and addressed concerns about keeping federal resources separate without requiring any of these artificial distinctions. We propose that hybrid financing deals demonstrate a plan for independent financing and ownership and provide a letter from tax counsel corroborating that the proposed structure will comply with IRS regulations.

Thank you for the opportunity to provide these comments. We look forward to working with CHFA as we expand on our important work together in the State of Connecticut.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dara Kovel", with a stylized, cursive script.

Dara Kovel
Chief Executive Officer



COMMENTS REGARDING DRAFT 2022 - 2023 QUALIFIED ALLOCATION PLAN
SUBMITTED BY CHARTER OAK COMMUNITIES AND RIPPOWAM COPORATION
MAY 26, 2021

The draft QAP contains a revision which we strongly support: The creation of a 25% set-aside for preservation projects is an important step toward recognizing the importance of ensuring the sustainability of existing affordable housing. However, we urge CHFA to limit access to the new set-aside to existing affordable housing developments with long term deed restrictions, primarily federal public housing and projects in the State Sponsored Housing Portfolio (SSHP). Opening up the set-aside to all multi family rental developments incentivizes owners to exaggerate and inflate the necessary scope of rehab in order to receive 9% credits instead of often more appropriate 4% credits. Restricting eligibility to federal and SSHP projects also ensures that developments already serving the lowest income households (and likely with the greatest rehab need) benefit from the new set-aside. Finally, in many cases, unrestricted properties under for-profit ownership may well be in poor condition because of deliberate or strategic under-investment. CHFA should not reward irresponsible owners with scarce public subsidy.

As we have noted in the past, CHFA has yet to publish data indicating that projects located in high opportunity areas are being occupied by households moving from impacted areas. In response to our last inquiry, CHFA responded that a sufficient number of projects in high opportunity areas had not yet leased up to allow such a database to be compiled. In the absence of clear evidence that the high opportunity emphasis is consistently achieving its goals, the large number of preference points available to such projects seems excessive. We suggest both a reduction in the points schedule and a limit on the number of credit awards to projects receiving high opportunity or location preference points of two per funding round.

We share the goal of achieving the greatest energy efficiency possible, but we are concerned that the cost of incorporating the items listed in the A-1 Sustainable Design Measures may be economically infeasible in those preservation projects with the greatest and costliest amount of rehab needed. Given the point structure contained in the draft QAP, it appears possible that projects with less rehab need could score higher than projects with greater and more urgent need because of the ability of those projects to afford more energy conservation measures. In ranking preservation proposals, we urge CHFA to focus primarily on the scope of work needed, the identification of the project in municipal plans or policies, and the relevant experience of the applicant.

Please do not hesitate to contact Jonathan Gottlieb, Vice President, Rippowam Corporation, with any questions or comments. Jgottlieb@charteroakcommunities.org

From: c2pattee@aol.com
To: [PublicComment](#)
Cc: RDobos@cthousingpartners.org; pkat7@earthlink.net; dmgrady@aol.com; lthomas13@yahoo.com
Subject: Testimony for May 19, 2021, 1 p.m. Public Hearing on LIHTC 2022 and 2023 Qualified Allocation Plan [QAP]
Date: Sunday, May 16, 2021 4:02:24 PM

[EXTERNAL EMAIL: If unknown sender, do not click links/attachments. Never give out username or password.]

5-16-21

To: Connecticut Housing Finance Authority (CHFA)

From: Christine Pattee, 98 Brookline Rd., Coventry CT 06238
Home 860-742-6511 c2pattee@aol.com

Re: Testimony for May 19, 2021, 1 p.m. Public Hearing on LIHTC 2022 and 2023
Qualified Allocation Plan [QAP]

I strongly support CHFA's affordable housing approach that puts small clusters of family housing into the streetscape of cities and dispersed throughout suburban towns. However, this approach has unintended, negative consequences for seniors in rural towns, especially in the northeast corner of the state.

My purpose in addressing you today is to explain why an affordable housing approach that works well for most of the state is not going to work for senior citizens in rural towns. I've been a professional demographer and statistician for fifty years, and this problem wasn't evident to me until about five years ago, when I realized I wouldn't want to shovel and mow forever at my lovely little house on two acres of land in the back woods of Coventry.

Rural towns in general have increasing proportions of residents over 65, with working-age residents moving out for better opportunities elsewhere and school-age populations staying stable or dropping slightly as the birth rate decreases. (Census figures for Coventry are similar in surrounding towns).

**Coventry Senior Housing Study Committee (SHASC)
Interim 8-17-20 report to Coventry Town Council**

"THE FACTS There is an increasing demand for affordable, community-style, small

scale senior living in Coventry”

The 65+ population will grow by **+27%** in Coventry by 2040

- By 2030, all Baby Boomers will be 65+
- 2,051 to 2,611, increase in 65+ residents from 2020-2040
- While total Coventry Population will decrease by 13%

1 in 3 Coventry senior households are overburdened by housing costs

- 495 pay more than 35% of their annual income on housing costs

The average Coventry senior median income is considered low to very-low income

- Coventry seniors’ median income (\$59,789) is 66% of Area Median Income (\$91,479)
- 750 senior households estimated to qualify for subsidized affordable housing

In Coventry, and surrounding rural towns, especially if they include a lake area, there are hundreds of small ‘beach cottages’ converted decades ago for year-round use. Two decades ago, to protect water quality, the state mandated sewerage of most of the lake area. On lakefront properties, small footprint beach cottages were built up into three story McMansions, with property taxes increasing proportionately (Coventry is one of the few towns with a rising Grand List). Off the lakefront, and in unsewered areas, beach cottages now sell for under \$200,000. And here is where the problem lies: selling these houses would be easy, but without an affordable place to move to, current residents have no incentive to sell. Yet, if those residents had an affordable place to move to, aka senior housing, hundreds of affordable small homes would open up for workers and young families.

There is another key reason why small clusters of dispersed housing will not work for the rural elderly, where existing housing is spread out over a large land area. Senior citizens need community, both physical proximity but more importantly for psychological reasons. Researchers have long known that loneliness and isolation are killer risks equal to heart disease and falls. The isolation brought about by the Covid pandemic has brought that reality home to all of us.

At the present time, barriers to building affordable housing in Coventry, in addition to skyrocketing building costs, include two-acre zoning lots, a prohibition against multiunit housing in the Lake Area Residential Zone, accessory dwelling units [ADUs] by permit only and a sewage system that is so close to capacity that there are only ten connection allotments left before a state mandate to upgrade is triggered.

For the past two years, I’ve been a member of the Town Council-sponsored Senior Housing Alternatives Study Committee, which has been examining costs of various types of senior housing, land-use policies and current lack of affordable housing, both low-income and moderate-income. Anecdotally, there are no current vacancies and years-long waiting lists in the small number of affordable housing complexes in surrounding towns.

After a presentation of income limits related to affordable housing, (see below) I was

astonished and dismayed to find that I qualify for affordable housing! I'm a single woman, in a professional career all my working life, and my retirement income (Social Security plus State of Connecticut Tier One retirement) of \$52,000 puts me below the qualifying income maximum for 'moderately affordable housing'. My house, a beach cottage on two acres, would sell for about \$225,000. Coventry has two over-55 'active elderly' condominium developments, where prices start at \$300,000 to \$400,000, depending on whether they are on the sewer line or community/individual septic systems. I'm fortunate to own my home free and clear, so I can stay here as long as I am healthy and mobile. If those conditions change for me, as they do for so many in my age group, there are virtually no options for me.

In Coventry, any household with a single earner making less than \$52,850, or married making \$60,400 annually, can qualify for affordable housing. Based on the United States Housing and Urban Development division (HUD), households that earn less than eighty percent (80%) of the Area Median Income (AMI) are considered lower-income, families earning less than half (50%) of the AMI are known as very low-income households. The AMI in Coventry's region defined by HUD is \$97,900. Income limits are based on the number of persons in a household with four being the standard

I speak from experience both long and immediate. I've been a professional health statistician and demographer for 50 years, retiring from the Connecticut Public Health Department as Director of Research and Vital Records. Now I am a 79 year old pre-Baby Boomer who loves living in a small house with a big yard in rural Coventry. About five years ago I realized I did not want to mow and shovel forever and so I've been talking about affordable senior housing to anyone who will listen. I've also been on Coventry's Planning and Zoning Commission for 15 years and a member of the subcommittee that wrote both the 2010 and the 2020 Plans of Conservation and Development [POCD]. In 2010 our emphasis was on Open Space, in 2020 on Housing. My signature line to get the attention of the Republican-majority Town Council in a light-hearted way is, "Who are the two most pinchpenny groups on God's green earth? Republicans and seniors. Who builds housing? Mostly Republican developers. Who needs housing? Seniors.

And now I ask CHFA and state affordable housing support agencies to take a close look at the facts I've presented and consider a change in funding protocols to better the lives of Connecticut's senior citizens, especially those who live in rural areas.

May 28, 2021

George Penniman
97 North Main Street
Essex, CT 06426

Re: Comments on CHFA's Draft Redline QAP for 2022 and 2023

Ms. Terry Nash Giovannucci, CHFA board members & staff, and Governor Lamont:

I am a resident of Essex, and am involved in my community as an architect, practicing in Essex for 30 years. I care about this issue because I have worked for years to increase awareness of sustainable building practices and their consequent benefits for the environment and public health. I appreciate this opportunity for public comment on the Draft Redline of the Low-Income Housing Tax Credit 2022 and 2023 Qualified Allocation Plan.

I strongly support the continued inclusion and increased points of the Passive House building standard in the QAP. It has a proven track record as the most robust energy efficiency high-performance standard, is widely acknowledged as the optimal path to achieve net-zero, and aligns with the state's ambitious energy goals concerning climate change and state housing.

I appreciate that CHFA listened to feedback on the Sustainable Design Measures section which is now poised to raise the bar over a two-year period by:

- Raising the maximum number of points to 13 (from 7),
- Breaking out options into sections with tiers, increasing in proportion to the rigor it would take to achieve various levels,
- The single most points for any one tier aligning with the most robust energy-efficient standards, including Passive House.
- Requiring additional elements such as balanced ventilation and commissioning.

The QAP should be used to encourage high quality buildings for the sector of the population who would most benefit from affordable utilities and healthy buildings.

Eversource has launched two meaningful programs in Connecticut to support the growing Passive House market: EnergizeCT Passive House Initiative and Passive House Incentives for Residential New Construction Passive House Multi-family buildings. With a similar combination of programs, plus points for Passive House in their QAP, Massachusetts is experiencing a market transformation – developers are motivated to pursue forward-thinking projects.

I recognize CHFA for their leadership to create an expansive and "future-proofed" Sustainable Design Measure section that is in lockstep with the state's climate and housing goals. This QAP has the potential to ensure that the next wave of affordable housing projects represent a beacon of sustainability in accordance with Governor Lamont's pledge that *"Connecticut will remain a leader on climate change"*¹.

¹ [portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut To Lead On Climate Change](https://portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut-To-Lead-On-Climate-Change)

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "George W. Penniman". The signature is fluid and cursive, with a long horizontal stroke at the end.

George W. Penniman, AIA, LEED AP, CPHD/C
97 North Main Street
Essex, CT 06426
860-227-3445
george@pennimanarchitects.com

May 28, 2021

Peter Millman
122 Dog Lane
Storrs, CT 06268

Re: Comments on CHFA's Draft Redline QAP for 2022 and 2023

Ms. Terry Nash Giovannucci, CHFA board members & staff, and Governor Lamont:

I am a resident of Mansfield, CT and involved in my community as a member of the town's Sustainability Committee. I also help lead Eastern CT Green Action. I care about this issue because there is no smarter investment for building owners, residents, and taxpayers than building to a highest level of energy efficiency. I appreciate this opportunity for public comment on the Draft Redline of the Low-Income Housing Tax Credit 2022 and 2023 Qualified Allocation Plan.

I strongly support the continued inclusion and increased points of the Passive House building standard in the QAP. It has a proven track record as the most robust energy efficiency high-performance standard, is widely acknowledged as the optimal path to achieve net-zero, and aligns with the state's ambitious energy goals concerning climate change and state housing.

I appreciate that CHFA listened to feedback on the Sustainable Design Measures section which is now poised to raise the bar over a two-year period by:

- Raising the maximum number of points to 13 (from 7),
- Breaking out options into sections with tiers, increasing in proportion to the rigor it would take to achieve various levels,
- The single most points for any one tier aligning with the most robust energy-efficient standards, including Passive House.
- Requiring additional elements such as balanced ventilation and commissioning.

The QAP should be used to encourage high quality buildings for the sector of the population who would most benefit from affordable utilities and healthy buildings.

Eversource has launched two meaningful programs in Connecticut to support the growing Passive House market: EnergizeCT Passive House Initiative and Passive House Incentives for Residential New Construction Passive House Multi-family buildings. With a similar combination of programs, plus points for Passive House in their QAP, Massachusetts is experiencing a market transformation – developers are motivated to pursue forward-thinking projects.

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Thank you for this opportunity to comment.

Sincerely,

Peter Millman
122 Dog Lane
Storrs, CT 06268
peter.millman7@gmail.com

Theodore Randall Sawruk
1150 South Main Street, Middletown, CT 06457

5/28/ 2021

Re: Comments on CHFA's Draft Redline QAP for 2022 and 2023

Ms. Terry Nash Giovannucci, CHFA board members & staff, and Governor Lamont:

I am a resident of Middletown and am involved in my community as a university professor and residential designer. I care about this issue because it is critical that the state of Connecticut further initiatives to create affordable and sustainable housing for all its current and future residents. I appreciate this opportunity for public comment on the Draft Redline of the Low-Income Housing Tax Credit 2022 and 2023 Qualified Allocation Plan.

I strongly support the continued inclusion and increased points of the Passive House building standard in the QAP. It has a proven track record as the most robust energy efficiency high-performance standard, is widely acknowledged as the optimal path to achieve net-zero, and aligns with the state's ambitious energy goals concerning climate change and state housing.

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Thank you for this opportunity to comment.

Sincerely,



Theodore Randall Sawruk
1150 South Main Street
Middletown, CT 06457
610-573-8559
sawruk@hartford.edu

¹ [portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut To Lead On Climate Change](https://portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut-To-Lead-On-Climate-Change)

From: [Adam Raider](#)
To: [PublicComment](#)
Subject: Public Comment: QAP
Date: Friday, May 28, 2021 4:15:53 PM

[EXTERNAL EMAIL: If unknown sender, do not click links/attachments. Never give out username or password.]

To whom it may concern:

I am writing to ask that the proposed 2022-2023 Qualified Allocation Plan (QAP) be modified to permit legacy, age-restricted organizations such as West Hartford Fellowship Housing to compete for funding.

WHFH has served and continues to serve a critical need in our community, providing affordable housing for seniors with limited financial resources, and disabled adults. But at 50 years old, these units lack many amenities and can no longer support the necessary lifestyles of their residents.

I sit on the WHFH development board and know that without funding, our dream of expanding and modernizing this development may never be achieved. We need the QAP to be modified to give us a realistic chance to compete for funding.

Please give this request serious consideration. Thank you for all that you do.

Sincerely,

Adam Raider
30 Seminole Circle
West Hartford, CT 06117
860-997-3095

--

Sent from my overpriced iPhone X

May 28, 2021

Connecticut Housing Finance Authority
Attention: Terry Nash Giovannucci
999 West Street
Rocky Hill, CT 06067

Re: *Low-Income Housing Tax Credit 2022 and 2023 Qualified Allocation Plan*

To Ms. Terry Nash Giovannucci:

Connecticut Green Bank ("Green Bank") submits the following comments as stakeholder feedback into the Connecticut Housing Finance Authority's ("CHFA") Low-Income Housing Tax Credit ("LIHTC") 2022 and 2023 Qualified Allocation Plan ("QAP"), pursuant to the notice provided May 6, 2021.

Comments on the Plan are as follows:

- **Commend CHFA** – the Green Bank would generally like to commend CHFA for soliciting input from various stakeholders on revisions to the LIHTC-QAP, and specifically recognize CHFA for its involvement of stakeholders with interest in Sustainable Design (e.g., as outlined in Exhibits A-1 and A-2). CHFA's efforts on Sustainable Design support Governor Lamont's Executive Order 1 and a number of statutory and regulatory public policies to enable the deployment of energy efficiency, renewable energy, and other clean energy resources (e.g., battery storage, electric vehicle infrastructure) in order to enable vulnerable communities¹ to confront climate change.
- **Onsite Distributed Energy Resources** – currently the incentive structure for distributed energy resource ("DER") deployment, including behind the meter renewable energy (e.g., solar PV), battery storage, and electric vehicle infrastructure, is being addressed by the Public Utilities Regulatory Authority ("PURA") through Docket Nos. 17-12-03 and 20-07-01. Providing developers with credits to encourage the onsite deployment of DERs (including fuel cells) will improve the property and provide benefits (e.g., reduction in energy costs, resilience from grid outages) to tenants. The Green Bank will

¹ Per Connecticut's Public Act 20-05, "vulnerable communities" means populations that may be disproportionately impacted by the effects of climate change, including, but not limited to, low and moderate income communities, environmental justice communities pursuant to section 22a-20a, communities eligible for community reinvestment pursuant to section 36a-30 and the Community Reinvestment Act of 1977, 12 USC 2901 et seq., as amended from time to time, populations with increased risk and limited means to adapt to the effects of climate change, or as further defined by the Department of Energy and Environmental Protection in consultation with community representatives.

continue to involve CHFA in these regulatory processes, where appropriate, to improve the development of Sustainable Design for low income affordable multifamily properties using LIHTC, and supporting other financing programs that CHFA deems relevant. The Green Bank welcomes opportunities to consult with developers regarding onsite or offsite renewables for both common areas and individual tenant units.

- **Offsite Renewable Energy Resources**- similar to onsite DERs, PURA is leading efforts to develop markets for offsite renewable energy through the Shared Clean Energy Facility (“SCEF”) policy within Docket No. 19-07-01. In anticipation of the revised QAP including Sustainable Design for both onsite and offsite renewable energy resources, the Green Bank submitted public comments into PURA expressing a position that would enable tenants residing within LIHTC-supported properties, that are individually metered, to be deemed low income and therefore eligible to subscribe for the benefits from the SCEF and receive Subscriber Savings (i.e., credit of \$0.025/kWh of electricity consumption for 20 years – about \$210 of savings per year). PURA may open a proceeding to discuss this opportunity. It should be noted that “energy affordability” is something that the Department of Energy and Environmental Protection (“DEEP”), PURA, and the Green Bank consider a priority, especially as it applies to vulnerable communities.
- **Conservation and Load Management** – as noted within the Sustainable Design aspects of the revised QAP, receiving DOE Zero Energy Ready Home Certification, meeting higher energy efficiency ratings (e.g., HERS, Energy Star, Passive House), and/or green building standards (e.g., NGBS, LEED, LBC), can be supported through the myriad of incentives offered by the electric and natural gas distribution companies through the Conservation and Load Management Plan (“C&LMP”). Developers should speak to Eversource Energy and United Illuminating, and seek out incentives at www.energizect.com

With the American Jobs Plan put forth by President Biden, there are potential significant resources that will come to Connecticut to modernize and decarbonize our state’s infrastructure, including housing, and making it more resilient to the impacts of climate change. CHFA’s efforts to revise the LIHTC-QAP, including its inclusion of Sustainable Design, will support the implementation of state policy. The Green Bank stands ready to continue to work with CHFA, Department of Housing (“DOH”), U.S. Department of Housing and Urban Development (“HUD”), DEEP, PURA, and others to ensure that vulnerable communities receive the benefits from investments in infrastructure.

Thank you for the opportunity to provide comment into the 2022 and 2023 – LIHTC QAP – Draft Redline process. Please let us know if you should have any questions.

Sincerely,



Bryan Garcia
President and CEO



May 11, 2021

Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

REF: Public Comments with respect to LIHTC 2022 and 2023 Qualified Application Plan (QAP)

Dear Public Comments:

I am providing public comments related to the notice of public hearing for the LIHTC 2022 and 2023 Qualified Application Plan (QAP). There are two large issues that the QAP scoring outcomes are impacting.

1. Aligning the scoring with current legislation and City and Town affordability Plans as outlined by the State.

Currently the scoring in the QAP favors urban development by providing maximum points totaling 14 and suburban points for less than 10% of 830-G maximum points of 9. The point system is already heavily favoring urban areas.

Priority locations outlined:

Designation as an urban area or urban cluster in the 2010 census
Boundaries that intersect a ½ mile buffer surrounding existing planned mass-transit stations
Existing or planned sewer services from an adopted wastewater facility plan
Local bus provided 7 days per week within ½ mile of the proposed development.
Development is in an opportunity zone.

All the above are resources that many Towns in Connecticut do not provide. The ability for the suburbs to earn points in the following areas is restricted which creates an environment in which the suburbs trying to reach their 10% 830-G goals is greatly diminished.

All studies state that Connecticut Suburbs have very limited affordable housing, and it is also creating a barrier for low-income households to have a choice of where to live. Urban environments in Connecticut are very diverse and suburban environments are not diverse.

The racial composition of communities in Connecticut and across the country did not happen by chance. It is the result of accumulated policy decisions over multiple generations that legalized and allowed market forces to produce segregated city neighborhoods and suburbs. Federal policies pre



"We Build and Transform Lives"



and post WWII influenced financial systems to institutionalize discrimination, as did exclusionary zoning policies, which proliferated and alter normalized within our state. While the 1978 Fair Housing Act was intended to protect individuals and families from discriminatory housing practices, CHFA' QAP continues to create barriers to fair housing and to provide diversification in all communities in Connecticut.

Recommendation: To remove any scoring that favors one community over another. In this case, any scoring that provides a benefit to urban environments and disparages suburban environments should be removed. The quality of the housing, the development team and other support should be the only measures and not which city or Town the development will be located.

2. Preventing the development of Senior Housing

The QAP outlines there are a loss of points if the housing is age restricted or there are less than 51% of units with 2 bedrooms or more. CHFA has not aligned itself with HUD to recognize that there is a severe lack of affordable housing for seniors.

Across all racial and ethnic categories, a higher proportion of older renter households face rental burdens and severe cost burdens compared to the renter population. While 47% of all renters are cost burdened the percentage of cost burdened seniors are age 62 +; 53% and age 75 +; 57% cost burdened. Older renters may have exhausted retirement savings, are spending more on medical expenses and are more likely to live alone bearing the entire rental burden themselves.

According to CHFA's multi-family housing dashboard located here:

<https://public.domo.com/embed/pages/eXj8l> There is a dire need for Senior housing in CT. According to their records, in 2019-2020 there were 12,588 occupied units of senior affordable housing in CT and there was a waiting list of 11,888. Which is 94% of capacity. Clearly there is need.

HUD Section 202 will not fund Senior rental units greater than 1 bedroom. This not only conflicts with CHFA's scoring but has the added potential to penalize a project on leverage points as well by limiting a senior project's sources.

Scoring a project based on the number of bedrooms is using public money to discriminate against seniors. CHFA should eliminate scoring by bedroom or have an additional funding round for senior projects.

Aging in place is very important to seniors and to accomplish this, resident services is a vital part of providing enrichment programs and connections to area resources to live independently. The QAP has recognized the need for resident services but fails to address the senior shortage.

Recommendation: Senior Housing and Family Housing should be scored the same. The fact that you are aligning the project to local planning and zoning conformance should dictate what type of housing each city and town has outlined that is needed.



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3. Sustainability Measures.

Recommendation: Everyone is supportive of the sustainability measures but CHFA's current QAP caps on tax credits and other financing does not provide an environment in which it can be paid for. Therefore, most applicants can only meet the minimum standards when CHFA should be creating a financing structure that allows a development to meet Tier 2 or 3 if this is a true goal.

Thank you,



Renée Dobos
Chief Executive Officer

"We Build and Transform Lives"



JUSTICE IN AGING

FIGHTING SENIOR POVERTY THROUGH LAW



NATIONAL LOW INCOME
HOUSING COALITION

ISSUE BRIEF

Low-Income Older Adults Face Unaffordable Rents, Driving Housing Instability and Homelessness

FEBRUARY 2021

Patti Prunhuber, Senior Housing Attorney, Justice in Aging
Vivian Kwok, Peter Harbage Fellow, Justice in Aging

ACKNOWLEDGEMENTS

The authors would like to thank Andrew Aurand and Dan Threet at the National Low-Income Housing Coalition for their valuable assistance and analysis of the 2018 American Community Survey data on rental cost burdens. We also thank Mike Koprowski and Chantelle Wilkinson at Opportunity Starts at Home for their helpful assistance in bringing this Issue Brief to fruition.

INTRODUCTION

Older adults are at the center of our nation's housing affordability and homelessness crisis, as our nation's population is aging and income inequality continues to grow, especially for older adults of color. Older adult renters are more likely to spend a large share of their income on rent than the population as a whole, and these rental cost burdens place them at increased risk of housing instability and homelessness. Due to discrimination and higher rates of poverty, Black and Latinx older renters are more likely than white older renters to have insufficient income and few assets as they enter retirement. Decades of disinvestment in affordable housing at the federal level and rising rental costs in communities across the nation have also led to a diminishing supply of affordable housing¹ for older adult renters.²

Caught in the vise between their fixed, lower incomes and steadily rising costs for rental housing, low-income seniors are facing unsustainable rent burdens, paying ever higher percentages of their meager incomes on housing. This untenable situation causes life-threatening stress and leads to people having to choose between paying rent, eating, or buying medications—while also increasing the risk they will be forced onto the streets.

Even before the pandemic and the related economic downturn, older adults living on low, fixed incomes faced increasingly unaffordable rents. **Nationally, more than 1.7 million extremely low-income (ELI) renter households with an older adult are severely cost-burdened, spending more than half of their income on rent and utilities.** An ELI household has income at or below 30% of the Area Median Income, or the Federal Poverty Level, whichever is greater.³

Securing stable, affordable housing for older adults has become more imperative in the context of the COVID-19 pandemic.

People 65 years of age and older and those with underlying medical conditions are at greatest risk for serious health consequences or death if they become infected with the virus. As of December, 2020, 30% of all renter households with a member age 65 and older reported a loss of employment income since March, and more than 9% of older renter households were behind in their rent payments.⁴ For older renters, being evicted from one's home and having to move in with others or becoming homeless—particularly during COVID-19—can have life-threatening consequences.

Caught in the vise between their fixed, lower incomes and steadily rising costs for rental housing, **low-income seniors are facing unsustainable rent burdens, paying ever higher percentages of their meager incomes on housing.**

THE INTERSECTION OF AGE AND RACE/ETHNICITY ON RENTAL COST BURDEN

MORE RENTERS FACE COST BURDENS AS THEY AGE

Across all racial and ethnic categories, a higher proportion of older renter households⁵ face rental cost burdens and severe cost burdens compared to the renter population as a whole.⁶ While 47% of all renters are cost-burdened, more than half of older renter households (53% or 4.7 million households) are housing cost-burdened, and almost one in three (30% or 2.6 million households) experience a severe cost burden.⁷ Black and Latinx older renters are also disproportionately rental cost-burdened.

Furthermore, a higher proportion of older renters experience cost burdens as they age, with 57% of renters age 75 and older experiencing cost burdens compared to 53% of renters age 62 and older (Figure 1).⁸ Older renters may have exhausted retirement savings, are spending more on medical expenses, and are more likely to be living alone, bearing the entire rental burden themselves. Older renter households also tend to have lower incomes than those of the general population.⁹

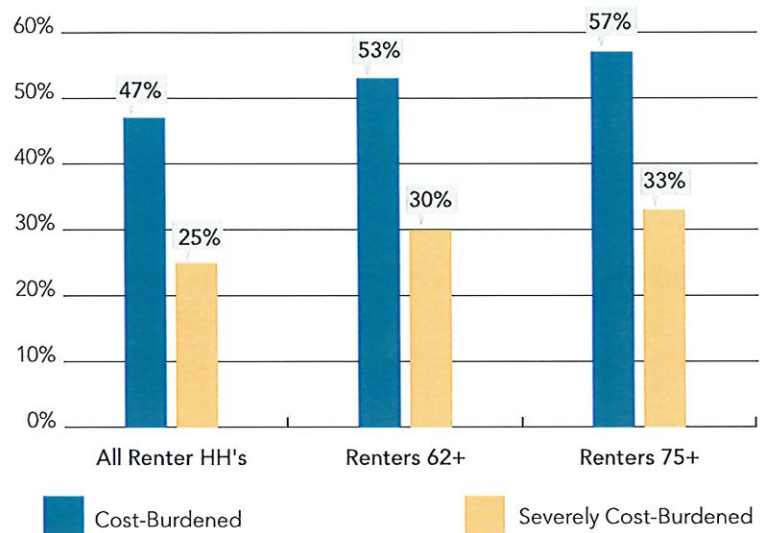
BLACK AND LATINX RENTERS ARE MORE LIKELY TO FACE HIGH COST BURDENS

Racial and ethnic disparities in rent

burdens also exist, with Black and Latinx renters more likely than white renters to be

both cost-burdened and severely cost-burdened. Among renters of all ages, more than half (55%) of Black renter households are cost burdened and almost a third (31%) are severely cost-burdened.

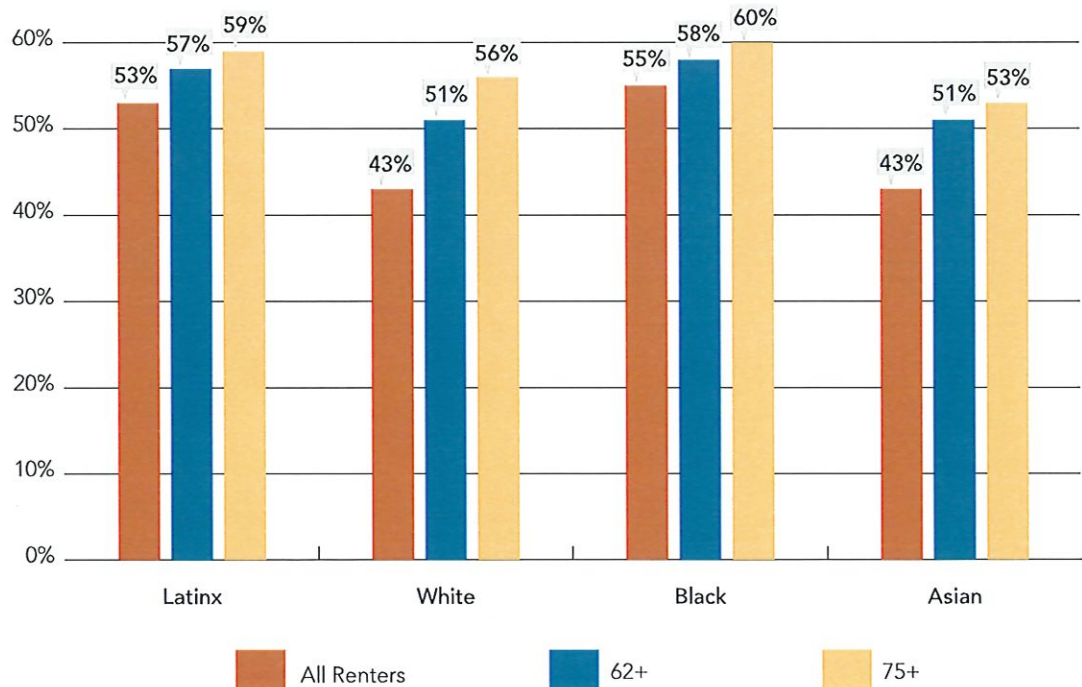
FIGURE 1
Percent of Cost-Burdened and Severely Cost-Burdened Renter Households by Age



Source: NLIHC tabulations of 2018 American Community Survey data.

FIGURE 2
Percent of Cost-Burdened Renter Households by Age and Race/Ethnicity

Source: NLIHC tabulations of 2018 American Community Survey data.



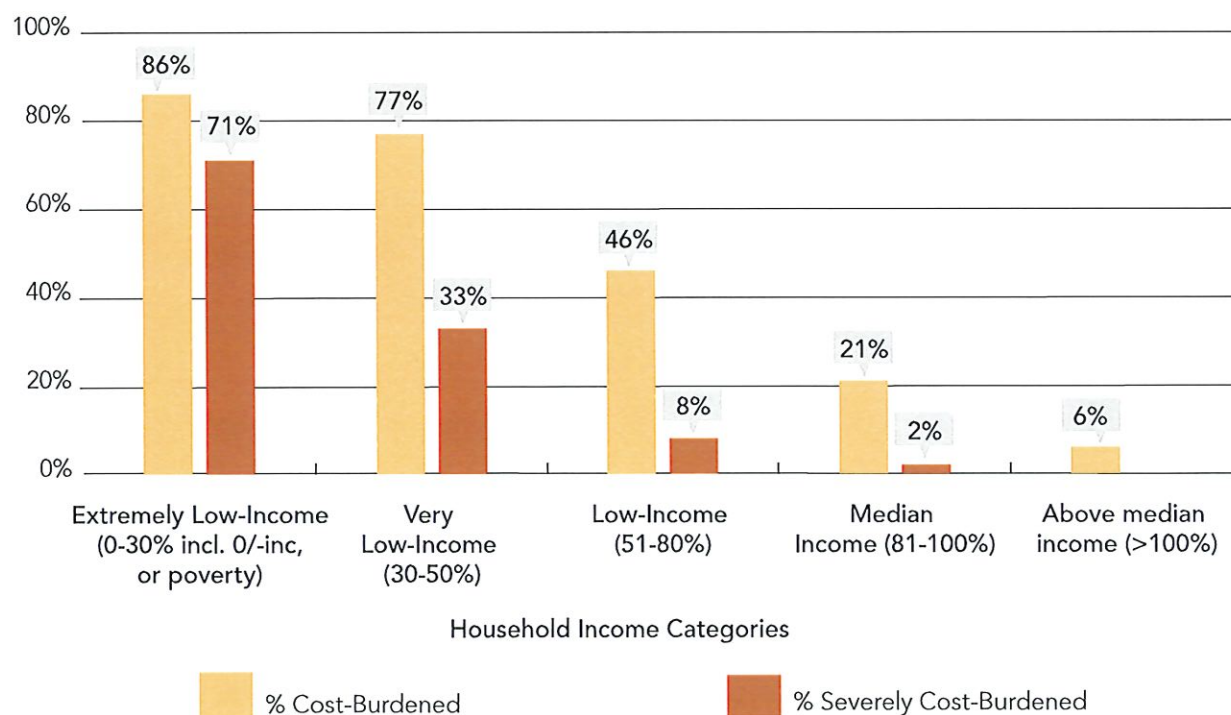
Moreover, racial and ethnic disparities in cost burdens persist for older renter households. While the proportion of white older (age 62+) renters who are cost-burdened is quite high (51%), the shares of older Latinx and Black renters who are cost-burdened are even higher: 57% of older Latinx households and 58% of older Black households are cost-burdened (Figure 2).

OLDER BLACK AND LATINX RENTERS' DISPARATE COST BURDENS ARE ROOTED IN INCOME INEQUALITY

EXTREMELY LOW-INCOME RENTERS (ELI) ARE PARTICULARLY COST-BURDENED

Demonstrating that inadequate income is the strongest predictor of rent unaffordability, ELI renter households of all ages and across all racial and ethnic groups remain overwhelmingly cost-burdened, with 86% cost-burdened and 71% severely cost-burdened (Figure 3).¹⁰ Seniors and persons with disabilities comprise almost half (46%) of all ELI renter households.¹¹ ELI renter households are forced to spend such a large share of their income on housing that they are more likely to be evicted, have less savings for emergency expenses, and are at higher risk of entering homelessness.¹²

FIGURE 3
Percent of Renter Households by Income and Cost Burden (All Ages)



Source: NLIHC tabulations of 2018 American Community Survey data.

BLACK AND LATINX SENIORS ARE MORE LIKELY TO LIVE IN ELI RENTER HOUSEHOLDS

Racial and ethnic disparities exist in the proportion of renter households who are ELI. Older households of color are much more likely than older white households to be ELI, and are therefore in even greater need of affordable, available homes. **Older Black, Latinx, Asian, and Native American households are about three times more likely to be ELI renters than older white households.**¹³ Whereas 5% of older white, non-Hispanic seniors live in ELI renter households, 18% of Black older households, 17% of older Hispanic households, 14% of older Asian households, and 13% of older American Indian or Alaska Native (AIAN) households are ELI renter households (Figure 4).

Older Black and Latinx renters who have experienced a lifetime of discrimination in employment and wages, housing, and wealth accumulation face significant barriers to economic security as they age. These inequities compound over time, leaving them more likely to rent rather than own their own homes and to have lower incomes and less retirement savings. Older Black and older Latinx renters are more likely to be both ELI renters and severely rent-burdened.

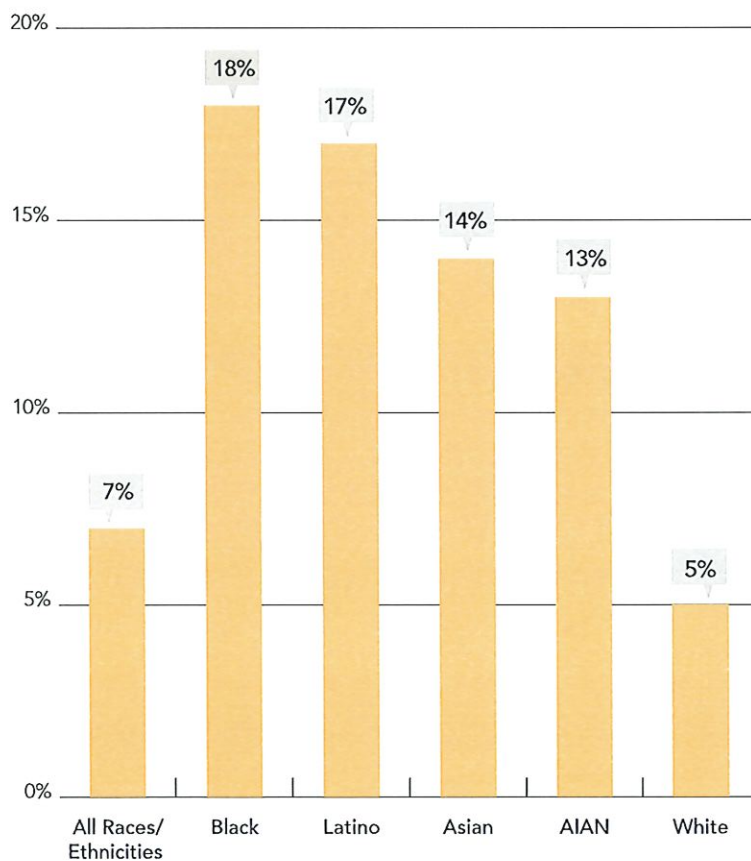
The most pronounced disparities in the incidence of homelessness occur for Black people who, in California, are more than five times more likely to become homeless than white individuals. And, these racial disparities in the risk of becoming homeless cannot be explained by the differences in poverty rates alone.¹⁴

A NATIONWIDE SHORTAGE OF AFFORDABLE RENTAL UNITS

No state has an adequate supply of affordable and available rental units to meet the needs of low-income renters, including seniors. The decrease in available, affordable units has contributed to increasingly more older adults becoming rent burdened or severely rent burdened.¹⁵

Over the last few decades, the federal government has failed to invest in the creation and maintenance of enough

FIGURE 4
Percent of Older Households Who Are Extremely Low-Income (ELI) Renters





Nationally, there are only **36 affordable units for every 100** Extremely Low-Income (ELI) renters who need them, with many **states and localities having an even lower supply.**

affordable rental units, and local governments have resisted equitable housing solutions in their communities. Developers of new construction in the private rental market have been producing more high-end rental units, and local governments have passed restrictive zoning laws that impede the development of multi-unit housing. Each year, privately owned but publicly subsidized housing developments are being converted to market rents when the mortgage is paid off or the subsidy contract expires. These factors have combined to decrease the number of low-cost units.

Nationally, there are only 36 affordable, available units for every 100 ELI renters who need them, with many states and localities having an even lower supply.¹⁶ More than 2.6 million older renter households pay more than one half of their monthly income for rent and are just one medical bill or emergency away from being pushed into the streets. With an overwhelming portion of their incomes dedicated to rent, many severely rent burdened older adults are going without heat, food or medication in order to pay their rent. Cost-burdened adults are more likely to report an inability to fill a prescription or adhere to health care treatments as a result of cost.¹⁷

[You can click here to learn about the housing affordability gap in your state,](#) and the percentage of ELI renters who are *severely rent burdened*.

A SURGE IN OLDER ADULT HOMELESSNESS

For the overwhelming majority of older ELI renters—who are disproportionately renters of color—rent burdens are unsustainable. Increasing numbers of older adults forced out of their homes are ending up homeless. In many parts of the U.S, older adults represent the fastest growing age segment of the homeless population, with nearly half of all older homeless people becoming homeless for the first time after age 50.

Without prompt and significant interventions, the number of people age 65 or older experiencing homelessness in the U.S. is estimated to almost triple to 106,000 by 2030.¹⁸

In many parts of the U.S., older adults represent the **fastest growing age segment of the homeless population**, with nearly half of all older homeless people **becoming homeless for the first time after age 50**.

POLICY SOLUTIONS

INCREASE AFFORDABLE, ACCESSIBLE HOUSING FOR SENIORS

Stable, affordable housing can improve health outcomes at any time,¹⁹ and particularly during a pandemic.²⁰ In order to provide long term housing stability, policymakers must dramatically expand rental assistance so that every qualified household receives help, dramatically expand the supply of housing affordable to the lowest income people, and create a permanent Emergency Assistance Fund that would offer short-term financial assistance and stability services to help households facing economic shocks.²¹

Research demonstrates that affordable housing can improve overall health by freeing up needed dollars to pay for food and health care expenditures. Rent burdened older adults who are paying excessive amounts of their income for housing often are left with insufficient resources for other essential needs, including food, medical insurance, and health care.

INCREASE INCOME SUPPORTS FOR LOWER-INCOME SENIORS

Expand and protect safety net programs such as Social Security and Supplemental Security Income (SSI) so that they provide sufficient basic income to ensure that no older adult pays more than 30% of their income for rent. New policies should also eliminate program barriers so that people at risk of, or experiencing homelessness, can benefit.

MAKE HEALTH CARE AFFORDABLE AND ACCESSIBLE

Expand Medicare and Medicaid benefits so that seniors' out-of-pocket costs for health care don't threaten their economic security. Prioritize community-based health care, making comprehensive home and community-based services (HCBS) a mandatory Medicaid benefit.

CONCLUSION

We must bring our housing, health, and income security policies together to ensure older adults can afford to remain housed by increasing the availability of affordable housing, ensuring basic economic security, providing targeted rent relief to low-income renters, and integrating affordable housing with community-based health and social supports. [You can read more here about Justice in Aging's recommendations](#) to the Biden/Harris administration to ensure that all low-income older adults have access to affordable, accessible, age-friendly housing.

ENDNOTES

- 1 The U.S. Department of Housing and Urban Development (HUD) defines “affordable” as housing that costs no more than 30 percent of a household’s monthly income. U.S. Department of Housing and Urban Development, *Archives*, available at, <https://archives.hud.gov/local/nv/goodstories/2006-04-06glos.cfm>.
- 2 During the seven-year period from 2012 to 2019, the average median rent for people’s primary residences rose an average of 28 percent – more than four times faster than the Consumer Price Index for all non-shelter items. Joint Center for Housing Studies of Harvard University, *America’s Rental Housing 2020*, available at, <https://www.jchs.harvard.edu/americas-rental-housing-2020>.
- 3 An Extremely Low-Income (ELI) household has income below 30% of the Area Median Income, or the Federal Poverty Level, whichever is greater. The Area Median Income (AMI) varies widely from region to region, and can be found for each state and county in the U.S. at https://www.huduser.gov/portal/datasets/il/il2020/select_Geography.odn. The federal poverty level in 2020 for an individual living alone is \$12,760/year and for a 2-person household is \$17,240, applicable in all 48 continental states and the District of Columbia. Office of the Assistant Secretary for Planning and Evaluation, *2020 Poverty Guidelines*, (January 21, 2020), available at, <https://aspe.hhs.gov/2020-poverty-guidelines#thresholds>.
- 4 In the December 2020 U.S. Census Household Pulse Study, 30.4% of renter households with a member age 65 or older reported a loss of employment income since March 13, 2020. Twenty nine percent of Black renter households (all ages) reported they were behind on their rent payments, more than twice the rate for white households. Source: Joint Center for Housing Studies of Harvard University tabulations of U.S. Census Bureau, Household Pulse Study for December 9-21 (Week 21), 2020, available at, [Interactive Tool Illustrates the Disparate Economic Impacts of the Pandemic | Joint Center for Housing Studies \(harvard.edu\)](https://www.jchs.harvard.edu/interactive-tool-illustrates-the-disparate-economic-impacts-of-the-pandemic).
- 5 “Older renters” or “older renter households” are used interchangeably to refer to renter households with at least one person age 62 and older. Such households could be a single older adult, an older adult living with a related older adult, or an older adult living with one or more related younger household members.
- 6 The U.S. Department of Housing and Urban Development (HUD) defines cost cost-burdened households as those who pay more than 30% of their income for rent and utilities. A household is severely cost-burdened if their rent and utility costs exceed 50% of their income. Unless otherwise noted, all rental cost burden data is from National Low-Income Housing Coalition (NLIHC) tabulations of the 2018 American Community Survey (ACS) PUMS one-year data.
- 7 “Affordable” housing includes both private market housing and publicly subsidized housing that costs no more than 30% of household income. This report focuses on older households’ *rental* cost burdens; however, a growing number of older homeowners with mortgages also face housing cost burdens. A total of 12.5 million older homeowner *and* older renter households are cost-burdened.
- 8 Source: National Low-Income Housing Coalition (NLIHC) tabulations of 2018 American Community Survey, PUMS one-year data.
- 9 *Id.* The problem is more acute for the growing number of people age 80 and over living alone, who have less than half the income of the same aged individual in a married couple, and are more than twice as likely to face rental cost burdens as married couples of the same age. Jennifer Molinsky, Joint Center for Housing Studies of Harvard University, *The Number of People Living Alone in their 80’s and 90’s is Set to Soar*, (March 10, 2020), available at, <https://www.jchs.harvard.edu/blog/the-number-of-people-living-alone-in-their-80s-and-90s-is-set-to-soar>.
- 10 *Id.* *Severely Housing Cost-Burdened Renters by income*, 2018, available at, https://reports.nlihc.org/sites/default/files/gap/gap-20-figure_06.pdf.
- 11 National Low-Income Housing Coalition, *The Gap: A Shortage of Affordable Homes: 2020*. Washington DC, available at, <https://nlihc.org/gap>, p. 15.
- 12 *Id.* at p. 16.
- 13 Source: National Low-Income Housing Coalition (NLIHC) tabulations of 2018 American Community Survey, PUMS one-year data.
- 14 The official poverty rate for white Californians is 8.4% and is 19.3 % for Black Californians, or 2.3 times the rate of whites. Yet Black Californians are more than five times more likely to become homeless than their white counterparts. Poverty Rate by Race/Ethnicity, 2020 American Community Survey, available at, <https://www.census.gov/library/publications/2020/demo/p60-270.html>.
- 15 National Low-Income Housing Coalition, *The Gap: A Shortage of Affordable Homes: 2020*. Washington DC, available at, <https://nlihc.org/gap>.

- 16 *Id.*
- 17 Center for Housing Policy, *The Impacts of Affordable Housing on Health*, (2020), available at, <https://www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf>.
- 18 Dennis Culhane et al., AISP, *The Emerging Crisis of Aged Homelessness: Could Housing Solutions be Funded by Avoidance of Excess Shelter, Emergency Room and Nursing Home Costs?*, available at, <https://www.aisp.upenn.edu/aginghomelessness/>.
- 19 Peggy Bailey, Center on Budget and Policy Priorities, *Housing and Health Partners Can Work Together to Close the Housing Affordability Gap*, 2020, available at: <https://www.cbpp.org/research/housing/housing-and-health-partners-can-work-together-to-close-the-housing-affordability>.
- 20 Alayna Calabro et al., National Low-Income Housing Coalition, *Housing is Healthcare: Challenges, Best Practices, and Policy Recommendations to Improve FEMA Programs to House People Experiencing Homelessness in Non-Congregate Shelters During the Pandemic*, (November 12, 2020), available at, https://nlihc.org/sites/default/files/FEMA_Housing-Is-Healthcare.pdf.
- 21 Opportunity Starts at Home, *Within Reach: Ambitious Federal Solutions to Meet the Housing Needs of the Most Vulnerable People*, (2020), available at: https://nlihc.org/sites/default/files/OSAH_Policy-Agenda.pdf.



Board of Directors:

Leonard Wyeth AIA
Cheryl Dieso AIA
George Penniman AIA
Sara Holmes AIA
Philippe Campus AIA
Alicia Dolce
Nicholas Jones
Katie Troy

May 26, 2021

Dear Governor Lamont, Commissioner Mosquera-Bruno, Members of the CHFA Board of Directors, and CHFA Staff:

This letter is submitted on behalf of [Connecticut Passive House](#) (CTPH), a registered Connecticut organization dedicated to education, training and resources on Passive House design and its building standards.

THE CTPH BOARD OF DIRECTORS EXPRESSES STRONG SUPPORT FOR THE FINAL DRAFT OF THE MULTI-YEAR 2022-2023 LIHTC QUALIFIED ALLOCATION PLAN (QAP).

We appreciate the following:

CHFA has the power to create incentives for affordable multifamily housing that will work in lockstep with Executive Order No. 3 to transform CT's built environment – a necessity if the state is going to meet its climate targets and resiliency goals.

The expanded participation of a diverse array of stakeholders, high-performance professionals and practitioners, alongside CHFA and DOH employees, has resulted in the creation of a comprehensive Sustainable Design Measures (SDM) section of the draft QAP. This collaborative process demonstrates CHFA's vision and leadership in creating a QAP that should facilitate both the state and agency's ability to meet its climate and housing goals for Connecticut's most vulnerable residents.

1. We support the increase in the maximum number of points available in the SDM section from 7 to 13 because it should incentivize developers to pursue high-performance measures that mirror the state's emphasis on decarbonization, clean energy, and resiliency.
2. The break-out into 5 separate sections should provide developers with options and point allocations that are commensurate with the level of "reach" necessary to achieve the designated performance standards and project features. This is a sensible approach that sends the right signals while also, "future-proofing" the QAP to reward innovation (as the availability of high-performance products and materials grow, new technologies emerge, and the knowledge of high-performance standards in the marketplace increases).
 - To support your efforts, CTPH is working with Eversource's newly launched EnergizeCT Passive House Initiativeⁱ to provide outreach, training, and resources to help build and equip a growing workforce of professionals and practitioners.
3. We are also pleased that the highest point value (4) for any one tier is allocated to the Energy Conservation (EC) section for the highest levels of energy efficiency (Tier 3) because this level of performance will be critical for Connecticut to achieve its mandated target for reductions in greenhouse gas

emissions. (“By January 2050, reduce GHG emissions to 80% below 2001 levels.”).ⁱⁱ,ⁱⁱⁱ

4. Given the customary lifespan of buildings (60 years) it is imperative to reduce the energy demand for all new construction to ensure that we are not inadvertently “locking in” inefficiencies for the foreseeable future.
 - The report, ‘Building a Low Carbon Future for Connecticut: Achieving a 45% Reduction by 2030’, identifies the building sector as contributing 31% of 2014 GHG emissions in our state. That percentage is even higher if you also consider that buildings use about 72% of the electrical power generation according to the ‘US Energy Information Administration’s Annual Energy Outlook 2014’. The building sector accounts for as much as 47% of the GHG emissions in Connecticut.
 - Specifically, **the inclusion of the Passive House (PH) building standard, which reduces a building’s energy demand for heating and cooling by up to 90 percent, in the EC- Tier 3 section is appropriate.** Due to the low energy usage profile of PH buildings, the UN identified Passive House as the best way to achieve the 2015 Paris Accord targets and continues to promote its adoption as a tool to reduce greenhouse gas emissions.^{iv}
 - o In the United States, California, Massachusetts, and New York have already incorporated passive house design strategies into their policies and/or building codes.^v Importantly, in New York’s case, the policies include a strong emphasis on retrofitting the existing building stock.^{vi}
 - o Additionally, modeled on the successful adoption of utility incentives to scale-up PH development in Massachusetts, Eversource has launched a comparable PH incentive program for Connecticut which should have a comparable impact.^{vii}
5. Finally, additional benefits of Passive House: health, comfort, durability, and ability to shelter in place^{viii} -- help address the reality that the most vulnerable citizens suffer the worst impacts of the climate crisis.^{ix} Specifically:
 - Passive House buildings contribute to improved health outcomes for occupants by delivering high indoor air quality.
 - o The emphasis on an airtight building envelope in the PH standard is one of its key elements. Specifically, PH requirements for airtightness are approx. 5-10 times tighter than a building built to the current codes. The PH standard requires energy recovery ventilation with “hospital grade” filtering – basically cleaner, healthier indoor air quality.
 - Occupants of PH buildings are able to safely and comfortably shelter-in-place for a sustained period of time^x in the event of electrical black-outs or extreme

weather. By encouraging developers to build affordable housing to the PH standard, CHFA is doing its part to help ensure that Connecticut's affordable housing stock is resilient to climate impacts.

In closing, as an organization committed to a cleaner, healthier, more resilient, carbon-free future for Connecticut, CTPH wants to acknowledge CHFA's leadership in their continued push to "raise the bar" to ensure the creation of high-quality affordable housing.

Respectfully, on behalf of the CTPH Board of Directors,



Leonard Wyeth, CTPH Board President

CTPH Board Members: P. Campus, C. Dieso, A Dolce, S. Holmes, N. Jones, G. Penniman, K. Troy. L. Wyeth

ⁱ [CTPH.org/EnergizeCT Passive House Training Program](https://www.ctph.org/EnergizeCT/PassiveHouseTrainingProgram)

ⁱⁱ [Connecticut Greenhouse Gas Emissions : Mitigation Options Overview and Reduction Estimates](https://www.ctph.org/ConnecticutGreenhouseGasEmissions/MitigationOptionsOverviewandReductionEstimates), December 17, 2010

ⁱⁱⁱ [S.B. 7-An Act Concerning Climate Change: Planning & Resiliency Public Act-18-82](https://www.ctph.org/S.B.-7-An-Act-Concerning-Climate-Change-Planning-&-Resiliency-Public-Act-18-82)

^{iv} [UN.org/United States-Passive House Building Technology As a Tool To Reduce GHG Emissions](https://www.un.org/UnitedStates/PassiveHouseBuildingTechnologyAsaToolToReduceGHGEmissions)

^v [connecticut-sb-7-an-act-concerning-climate-change-planning-and-resiliency-public-act](https://www.connecticut-sb-7-an-act-concerning-climate-change-planning-and-resiliency-public-act)

^v newbuildings.org/getting-to-zero-with-passive-house-design-standard/

^{vi} Yancey, Richard, 2019. "New York's Path to Scaling Up Passive House."

<http://passivehousebuildings.com/magazine/new-yorks-path-to-scaling-up-passive-house/>

^{vii} Eversource Connecticut's [Residential New Construction Passive House Multi-family tax incentives](https://www.eversource.com/en/energy-efficiency/energy-savings-programs/residential-new-construction-passive-house-multi-family-tax-incentives)

^{viii} [Phius.org/PH Benefits-comfort-durability-health](https://phius.org/PH-Benefits-comfort-durability-health)

^{ix} www.buildinggreen.com/feature/affordable-housing-and-sustainable-design-goals-are-aligned

^x rmi.org/Hours-of-Safety-insight-brief.pdf

May 28, 2021

Catherine Santos Young

Re: Comments on CHFA's Draft Redline QAP for 2022 and 2023

Ms. Terry Nash Giovannucci, CHFA board members & staff, and Governor Lamont:

I am a resident of Middletown and am involved in my community as an architect and volunteer for various organizations such as the Middletown Clean Energy Task Force, Complete Streets Committee, Sustainable Middletown, and Connecticut Passive House . I appreciate this opportunity for public comment on the Draft Redline of the Low-Income Housing Tax Credit 2022 and 2023 Qualified Allocation Plan.

I strongly support the continued inclusion and increased points of the Passive House building standard in the QAP. It has a proven track record as the most robust energy efficiency high-performance standard, is widely acknowledged as the optimal path to achieve net-zero, and aligns with the state's ambitious energy goals concerning climate change and state housing.

I appreciate that CHFA listened to feedback on the Sustainable Design Measures section which is now poised to raise the bar over a two-year period by:

- Raising the maximum number of points to 13 (from 7),
- Breaking out options into sections with tiers, increasing in proportion to the rigor it would take to achieve various levels,
- The single most points for any one tier aligning with the most robust energy-efficient standards, including Passive House.
- Requiring additional elements such as balanced ventilation and commissioning.

The QAP should be used to encourage high quality buildings for the sector of the population who would most benefit from affordable utilities and healthy buildings.

Eversource has launched two meaningful programs in Connecticut to support the growing Passive House market: EnergizeCT Passive House Initiative and Passive House Incentives for Residential New Construction Passive House Multi-family buildings. With a similar combination of programs, plus points for Passive House in their QAP, Massachusetts is experiencing a market transformation – developers are motivated to pursue forward-thinking projects.

I recognize CHFA for their leadership to create an expansive and "future-proofed" Sustainable Design Measure section that is in lockstep with the state's climate and housing goals. This QAP has the potential to ensure that the next wave of affordable housing projects represent a beacon of sustainability in accordance with Governor Lamont's pledge that *"Connecticut will remain a leader on climate change"*¹.

Thank you for this opportunity to comment.

¹ [portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut To Lead On Climate Change](https://portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut-To-Lead-On-Climate-Change)

Sincerely,

Catherine Santos Young
62 Lakeside Ave.
Middletown, CT 06457
860.204.1685
catherine@pennimanarchitects.com

May 19 2021

Terry Nash Giovannucci
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067



Shenae Draughn
Interim President

RE: Comments to the 2022-2023 Proposed Qualified Allocation Plan

Dear Ms. Nash:

We are writing to strenuously object to the Connecticut Housing Finance Agency's proposed 2022-2023 Qualified Allocation Plan as it relates to the proposed removal of the Public Housing Classification. As you know, this Public Housing Classification has led to the preservation or new construction of a significant number of public units throughout the state, thus addressing the housing needs of Connecticut's residents who are most disadvantaged and most at-risk of homelessness. The Public Housing Classification is especially important because the QAP, as written, otherwise significantly disadvantages applicants in New Haven and similar communities, and particularly those who focus on the replacement of obsolete public and assisted housing.

Opportunity Characteristics

The proposed QAP provides a total of 15 points for "Opportunity Characteristics". We appreciate and support CHFA's efforts to support developments that promote resident choice, but have concerns about the way in which the associated metrics disadvantage the Housing Authority of the City of New Haven and similarly situated housing authorities. Specifically, applicants like us will likely not be eligible for more than 2 points in this point category. Most if not all of the prior 5 years of 9% awards in New Haven are located in census tracts that would receive 0 points, effectively creating a competitive process where municipalities such as New Haven start with a 15 point deficit.

In the past, we have been disadvantaged when competing on a points basis with developers who were free to locate their sites in a state with a high or moderate opportunity index. In fact, the vast majority of the City of New Haven is categorized as low or very low on this index. Nevertheless, each of our projects undergoes a rigorous fair housing and equal opportunity review by HUD's Office of Fair Housing and Equal Opportunity, and the project is not permitted to proceed unless it is determined that the project meets federal fair housing requirements. As you know, being located in an area of opportunity is one - but not the only - way in which a development can affirmatively further fair housing. Our projects meet and exceed fair housing requirements, as confirmed by rigorous and continuous reviews. At the same time, we have utilized our redevelopment activities to revitalize communities throughout the City of New Haven,

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360 Orange Street, P.O. Box 1912, New Haven, CT 06511
(203) 498-8800 · TTD (203) 497-8343 · www.elmcitycommunities.org



Housing Authority of New Haven

Shenae Draughn
Interim President

a locality with one of the highest occupancy rates in the country. Nevertheless, under the proposed rule, we would be significantly disadvantaged and might not be able to score competitively.

The City of New Haven has thirty (31) census tracts of which twenty-two (22) have a minority concentration of 55% or greater and nine (9) have a minority concentration below 55%. The City of New Haven as a whole has an average minority concentration of 68%. Nevertheless, we have continuously demonstrated that our developments are "an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood...." and the sites are "in a neighborhood experiencing significant private investment that is demonstrably changing the economic character of the area." As a result, we have been able to demonstrate that our projects meet civil rights requirements.

Change from Public/General to Rehab/New Construction Set-asides

The Public Housing Classification recognized both: (i) the significant need for maintaining and replacing distressed public housing and (ii) the reality that public housing authorities cannot choose where to locate their projects. The elimination of this category would disadvantage public housing authorities by requiring them to compete against private developers who can freely locate their developments in areas that claim the most points under the QAP.

CHFA has been a crucial partner in ensuring that public housing remains a viable housing option in cities like New Haven and recognizing the significant impact that redevelopment of those properties has had on cities like ours. Unfortunately, the elimination of the Public Housing Classification, together with the continued emphasis on providing points for "Opportunity Characteristics", penalizes urban areas where many of the larger housing authorities tackle some of the most complicated and needed development efforts. The proposed elimination of the Public Housing Classification (along with the elimination of the three (3) points previously offered for a State Sponsored Housing Portfolio) represents a significant departure from this long-standing commitment to public housing.

Finally, CHFA has referenced an analysis that was completed that determined that there was no longer a need for a Public Housing Classification. Such an analysis has not been shared with interested parties, so there has been no opportunity to review such a critical component of this

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Housing Authority of New Haven

Shenae Draughn
Interim President

proposed change. The public must be provided the opportunity to review any basis for such a major change to the QAP, and any related proposed changes to the QAP should be delayed until this information can be reviewed and commented on. We truly appreciate your longstanding commitment to public housing authorities, and urge you to continue to support this partnership throughout the state through the continued inclusion of the Public Housing Classification in the QAP.

Sincerely,

Shenae Draughn
Interim President

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May 19, 2021

Connecticut Housing Finance Authority
Attn: Terry Nash Giovannucci
999 West Street
Rocky Hill, CT 06067

Submitted electronically: PublicComment@chfa.org

Dear Ms. Giovannucci:

On behalf of Home Innovation Research Labs, I respectfully submit comments on the proposed 2022 and 2023 Connecticut Qualified Allocation Plan (QAP).

We offer the following points for your consideration:

- Praise for the expanded Sustainable Design criteria that incorporates new options for renewables, electrification, and resiliency.
- Recommendation that CHFA require evidence of third-party certification for all the recognized energy and green building programs, rather than rely on reports from the project's consultants and engineers.
- For New Construction, request that the point values for Tier 1 and Tier 2 Green Building options be increased to 4 points and 7 points, respectively, to better reflect the comprehensive nature and higher energy performance of the green building programs.

Praise for Sustainable Design Category

The draft 2022-2023 QAP includes a broad Sustainable Design category that addresses energy efficiency, green building, renewable energy, resiliency, and connectivity. We praise CHFA for its continued commitment to sustainable design and addition of new measures that will make funded communities more resilient to critical threats. By offering multiple options available for competitive points, CHFA is empowering applicants to pursue the options that are the most meaningful to the project team. We respectfully request that this category be retained in the final draft.

We especially commend CHFA for continuing to include third-party green rating systems within the Connecticut QAP. Comprehensive green building programs support true housing affordability and ensure that funded buildings are designed to support the comfort and health of residents. The three main green rating systems included within the Green Building sub-category—the National Green Building Standard (NGBS), Enterprise Green Communities, and LEED – are all credible ratings systems that are comparable in terms of comprehensiveness and rigor.

Evidence of Certification Achievement

To receive points for Sustainable Design measures, applicants are expected to provide “plans, specifications, energy conservation plans, third-party energy consultant or professional engineer’s report, and/or other supporting documents.” Third-party certification for the recognized energy and green building programs does not appear to be required.

We strongly recommend that CHFA require full third-party certification to comply with the green building sub-category. More specifically, CHFA could require proof of green building certification prior to the issuance of the IRS Form 8609. By requiring third-party certification, CHFA would receive far greater assurance of construction quality, operational efficiency, and resident comfort.

The referenced green building programs are more than simply design standards. For example, the NGBS includes practices pertaining to the design, construction, verification, and ongoing operation of certified buildings. It is unreasonable to expect an architect to assess compliance beyond their typical scope of work. Further, design professionals may not be the most knowledgeable on all the specifics of green building compliance and may have a financial incentive to demonstrate building compliance.

Credible green building certification programs require on-site verification by a third-party professional. For example, the NGBS requires that a qualified, independent third-party inspect the project and verify that all green design or construction practices claimed by the builder toward green certification are incorporated correctly into the project. Most projects require at least two inspections. The verifier must perform a rough inspection before the drywall is installed to observe the wall cavities, and a final inspection once the project is complete. The required verification offers imbues an elevated level of rigor and quality assurance to the projects that are certified. An affordable housing organization can be assured that construction practices for higher building performance and healthier residences are successfully achieved.

Points for Green Building

Each sub-category of Sustainable Design includes multiple tiered options, each associated with one to three points. For Green Building, two points are available for Enterprise Green Communities 2020, NGBS Gold, or LEED Gold; and three points are available for NGBS Emerald, LEED Platinum, or Living Building Challenge Core Ready.

I respectfully request that point values for these two sub-categories be increased to 4 points and 7 points, respectively, to better reflect the comprehensive nature and higher energy performance of the recognized green building programs. The recognized green rating systems are all rigorous, multi-attribute green building certification programs that are significantly more comprehensive than any of the other options within the Sustainable Design category. In fact, many of the other options—energy conservation, renewables, resiliency, and commissioning—are all included options within the recognized green building rating systems.

For a residential building to comply with the NGBS, the building must successfully meet all mandatory practices. The building must also contain enough practices from each of the six categories of green building practices to meet the required threshold points. The six categories of green practices are:

- Lot & Site Development
- Resource Efficiency
- Energy Efficiency
- Water Efficiency
- Indoor Environmental Quality
- Homeowner Education

The NGBS requires that all projects must achieve a minimum point threshold in every category of green building practice to be certified. A project certified to the NGBS can't merely obtain all or most of its points in a few categories. Under the NGBS, homes and multifamily buildings can attain one of four potential certification levels: Bronze, Silver, Gold, or Emerald. To move up in certification level, higher levels of points must be achieved in every category.

Further, it is simply incongruous to award an equivalent number of points for Gold and Emerald/Platinum green building certification as are available for HERS scores between 46 and 50. Green building compliance at those levels requires higher energy performance, in addition to the other far-reaching compliance requirements that address lot design, resource efficiency, water efficiency and indoor environmental quality.

For NGBS compliance at the Gold-level, energy efficiency at least 15% higher than the IECC 2018, or a HERS score of 45, is required. NGBS Gold is 5% higher in terms of energy performance than a HERS score of 50. Both achievements are recognized at 2 points within the QAP.

For NGBS compliance at the Emerald-level, energy efficiency at least 20% higher than the IECC 2018, or at HERS score of 40, is required. NGBS Emerald is 6% higher in terms of energy performance than a HERS score of 46¹. Both achievements are recognized at 3 points within the QAP.

The current QAP point structure positions green building compliance as lesser options than the other sub-categories, which require much less investment for an equal number of points.

About Home Innovation Research Labs

Home Innovation Research Labs serves as Adopting Entity and provides certification services to the NGBS. Home Innovation Labs is a 56-year old, internationally-recognized, accredited product testing and certification laboratory located in Upper Marlboro, Maryland. Our work is solely focused on the residential construction industry and our mission is to improve the affordability, performance, and durability of housing by helping overcome barriers to innovation. Our core competency is as an independent, third-party product testing and certification lab, making us uniquely suited to administer a green certification program for residential buildings. Our staff is made up of mechanical, structural, and electrical engineers; planners; economists; architects; former builders, remodelers, and contractors; lab and technicians. Combined, they possess an unparalleled depth of knowledge and experience in all facets of market analysis and building science research and testing. Why is that important? Because

¹ See Energy Performance comparison charts at www.HomeInnovation.com/CompareNGBS.

behind every building seeking NGBS compliance stands a team of experts on a mission to help them succeed. Participation in NGBS Green brings our building science expertise to each project team at no additional cost.

Summary

Thank you for the opportunity to provide feedback prior to the release of CHFA's final 2022-2023 QAP. We appreciate CHFA's collaborative and inclusive approach.

We applaud CHFA for crafting robust Sustainable Design criteria that addresses energy conservation, green building, renewable energy, and resiliency. We request that CHFA explicitly require third-party certification to the recognized energy and green building programs. We respectfully request that the point values for Green Building be increased to better reflect the more comprehensive and rigorous requirements of the recognized rating systems.

I am happy to meet with you or your staff should you require a more detailed overview of the NGBS or our certification program. I will also gladly send you any supplemental information that you might require. Please do not hesitate to contact Michelle Foster (mfoster@homeinnovation.com, 301.430.6205), our vice president of Sustainability, directly if she can be of further assistance.

I look forward to continuing our effort to promoting green certified affordable housing in Connecticut.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Luzier". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Luzier".

Michael Luzier
President & CEO



An International Vision for
Community-Driven Transformation

May 27, 2021

Nandini Natarajan
Chief Executive Office
Connecticut Housing Finance Agency
999 West Street
Rocky Hill, CT 06067

RE: CONNECTICUT 2022-2023 QUALIFIED ALLOCATION PLAN

Dear Ms. Natarajan,

The International Living Future Institute is pleased to see that the State of Connecticut is proposing the inclusion of green building and energy conservation criteria in the 2022-2023 Qualified Allocation Plan, including ILFI's Zero Energy Ready and Core Ready designations. We are working with almost fifty affordable housing developers throughout the country who have registered for ILFI's Living Building Challenge, Core, Zero Energy, and Zero Carbon certifications. Ensuring that funding is prioritized for teams that design to the highest levels of energy efficiency and optimize human and environmental health will help raise the bar throughout the sector. The benefits of creating a Zero Energy Ready or Core Ready affordable housing building include fewer health issues for residents, improved indoor air quality, drastically reduced energy and water bills, among many others.

The leadership shown by the Connecticut Housing Financing Agency in adopting these measures will go a long way towards decarbonizing the built environment, as well as helping to mitigate the toxicity that is all too often associated with low-income communities and affordable housing. Steering funding towards high-performing projects will help catalyze a transformation towards housing that is equitable, healthy, sustainable, and that results in overall lower operating costs for both the residents and property owners.

The International Living Future Institute strongly supports the sustainability measures that have been proposed for the 2022-2023 Qualified Allocation Plan. We are certain that these additional measures will help spur the construction of additional Zero Energy Ready and Core Ready affordable housing buildings in the state and demonstrate the leadership of Connecticut in healthy, equitable, and sustainable housing.

Sincerely,

Kathleen Smith, LEED Fellow, LFA, EcoDistricts AP
Director, Technical Support Services

International Living Future Institute
1501 East Madison Street, Suite 150, Seattle 98122
t: 206.223.2028x34 | c: 206.321.3125 | www.living-future.org

May 28, 2021

Kenneth Boroson, Principal
Kenneth Boroson Architects, LLC
315 Peck Street
New Haven, CT. 06511

Re: Comments on CHFA's Draft Redline QAP for 2022 and 2023

Ms. Terry Nash Giovannucci, CHFA board members & staff, and Governor Lamont:

I am a resident of New Haven, CT and am involved in my community as an architect. I care about this issue because of the need to lower our carbon footprint and energy use to combat climate change. I appreciate this opportunity for public comment on the Draft Redline of the Low-Income Housing Tax Credit 2022 and 2023 Qualified Allocation Plan.

I strongly support the continued inclusion and increased points of the Passive House building standard in the QAP. It has a proven track record as the most robust energy efficiency high-performance standard, is widely acknowledged as the optimal path to achieve net-zero, and aligns with the state's ambitious energy goals concerning climate change and state housing.

I appreciate that CHFA listened to feedback on the Sustainable Design Measures section which is now poised to raise the bar over a two-year period by:

- Raising the maximum number of points to 13 (from 7),
- Breaking out options into sections with tiers, increasing in proportion to the rigor it would take to achieve various levels,
- The single most points for any one tier aligning with the most robust energy-efficient standards, including Passive House.
- Requiring additional elements such as balanced ventilation and commissioning.

The QAP should be used to encourage high quality buildings for the sector of the population who would most benefit from affordable utilities and healthy buildings.

Eversource has launched two meaningful programs in Connecticut to support the growing Passive House market: EnergizeCT Passive House Initiative and Passive House Incentives for Residential New Construction Passive House Multi-family buildings. With a similar combination of programs, plus points for Passive House in their QAP, Massachusetts is experiencing a market transformation – developers are motivated to pursue forward-thinking projects.

I recognize CHFA for their leadership to create an expansive and "future-proofed" Sustainable Design Measure section that is in lockstep with the state's climate and housing goals. This QAP has the potential to ensure that the next wave of affordable housing projects represent a beacon of sustainability in accordance with Governor Lamont's pledge that *"Connecticut will remain a leader on climate change"*¹.

¹ [portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut To Lead On Climate Change](https://portal.ct.gov/Office-of-the-Governor/2019/09-2019/Governor-Lamont-Signs-Executive-Order--Connecticut-To-Lead-On-Climate-Change)

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kenneth Boroson", with a stylized, flowing script.

Kenneth Boroson, AIA, LEED AP® BD+C
Principal
kboroson@kbarch.com
203.624.0662 x101
Cell: 203.444.2721



May 28, 2021

Ms. Nandini Natarajan, CEO
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Dear Ms. Natarajan:

We are writing in response to the call for comments on Connecticut's Qualified Allocation Plan (QAP) for the State's Low-Income Housing Tax Credit program. We would like to suggest the following modifications to the QAP for 2021:

- Enhanced pre-application review. We applaud CHFA and DOH's commitment to reviewing over 140 submissions through its Developer Engagement Process. We recommend building on this success with a robust pre-application that identifies and guides projects that are at an early stage and not ready for competitive review. Given the high cost of application submission, it is critical that developers and the agency work together to avoid costly unsuccessful applications.
- Preservation Classification. We are pleased to see that CHFA has separated review of preservation and new construction projects, recognizing that these classifications have differing needs. We also appreciate that the priority ranking procedure is open-ended, rather than encouraging projects to hit pricing targets that may not fulfill all of the needs at aging properties. While this is a two-year QAP process, we request that CHFA re-open comments following the 2022 award notification to evaluate the priority structure and offer comments.
- Increased opportunity for Black and Brown developers. We applaud CHFA's continued two-point incentive for development entities that meet the State's definition of an MBE. We propose clarifying that language as to what role in the team and ownership structure is required. The Wisconsin QAP offers two points to "applications that include a minority developer or minority co-developer that have at least 24% stake in all aspects of the development including but not limited to ownership, cash-flow, and voting rights," and three points to applications for which the qualified developer has a minimum of a 49% stake. This structure encourages meaningful participation by minority developers, and builds their capacity to work toward a lead developer role. We encourage adopting this language and structure, with a focus on those from Connecticut.
- Remove points for 90% plans and specifications. We propose removing the one point incentive for 90% plans and specifications. The stated rationale for this policy is the increased reliability of cost estimates prepared with fully developed plans, however in the current world of wildly fluctuating construction costs, we do not feel that this benefit outweighs the substantial cost to developers to fund 90% drawings for unfunded projects.
- Walkability and access to public and private amenities. While we would prefer the projects be within a shorter distance of those amenities, we are heartened to see that CHFA has added points to projects that offer access to public and private amenities. We recommend that a higher level of points be awarded to projects with amenities within one mile, a reasonable standard for walkability.

Additionally, we recommend that CHFA implement a Smoke-free Housing policy for projects funded with CHFA or DOH funding. HUD implemented a policy that requiring all Public Housing Agencies to have a smoke-free policy in place by July 31, 2018. Amending the required CHFA Amendment to Lease forms to require a Smoke-free Housing policy would add no additional cost to housing developments or the Agency, while improving health outcomes for residents of CHFA-subsidized housing and reducing operating and turnover costs for property owners.

Thank you for the opportunity to present this feedback. We welcome the opportunity to discuss this with you further.

Sincerely,

James Horan, Executive Director
LISC Connecticut

Local Initiatives Support Corporation

75 Charter Oak Avenue, Suite 2-250 Hartford, CT 06106 • T 860.525.4821 • lisc.org/connecticut-statewide



PO Box 364 Chester CT 06412

May 25, 2021

Terry Nash Giovannucci
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Submitted via email to: PublicComment@chfa.org

RE: Comments on the LIHTC 2022 and 2023 Qualified Allocation Plan

Dear Terry:

On behalf of MaGrann Associates, I would like to submit the following comments on the proposed 2022 and 2023 LIHTC Qualified Allocation Plan (QAP).

I have had the privilege of working on numerous LIHTC applications and projects over the last ten years, originally with my own company, Home Energy Technologies, and more recently with MaGrann Associates. MaGrann Associates merged with Home Energy Technologies in 2020 and is a leading energy efficiency, sustainability and MEP engineering consulting firm serving clients from Virginia to New Hampshire.

My comments are made strictly from a sustainability perspective and I would like to applaud CHFA for the innovative changes proposed in the 2022/23 QAP. CHFA has clearly listened to the input from its stakeholders and incorporated it into the QAP. In particular, I would like to recognize the following significant improvements:

- The 2-year plan provides some welcome stability for developers planning new projects, particularly in year 2 of the QAP. In the past, the annual QAP changes have made it difficult for developers to decide what sustainability measures to include in their design, particularly since the final QAP is not released until 3-4 months before the application deadline.
- The separation into Preservation and New Construction Classifications has leveled the playing field for existing building projects that in the past were often at a disadvantage when competing against new construction projects.
- The increase in the points for New Construction: Sustainable Design clearly shows CHFA's leadership in promoting new construction that will endure for generations, that supports the state's decarbonization goals and will ensure quality housing for all our residents.
- The adoption of the menu approach in Exhibit A-2 allows developers greater flexibility to choose the most appropriate sustainability measures to incorporate into their projects to achieve the points total desired for their application.

The following comments are intended to identify areas where clarification may be required and not to criticize the underlying concepts:

Section III.D Preservation Classification Priority Ranking & Exhibit A-1

It would be helpful to give applicants seeking an award in the Preservation Classification some clearer guidance on how to improve the ranking of their project. In this section the QAP identifies 6 priorities and states that they “... are listed in declining order of significance” without providing any indication of the relative weight the Authority will assign to each priority. This may lead applicants to focus excessively on the first listed priorities feeling that the last two, Sustainable Design and Ownership Experience, both of which should be important criteria, will count for little in the evaluation.

Concerning the Sustainable Design measures:

- Section III.A.22 requires that all applications shall propose a scope of work “...for the highest energy efficiency and sustainable design measures appropriate”. As a sustainability consultant who will be advising applicants it is not clear to me how it will be determined what is “highest” and what is “appropriate”
- The same section states that “....(ii) to the extent appropriate and practical for the Proposed Development, shall include the required items set forth on Exhibit A-1....”. However, Exhibit A-1 does not list any “required items” other than a scope of work. While it does list 7 “expected” items these are only required “to the extent appropriate and practical for the property”.

It appears that there is a lot of subjectivity in these criteria and that may put the energy consultant in a difficult position of having to determine what is “appropriate and practical” without more specific guidance.

Section III.H.2.f Sustainable Design & Exhibit A-2

These comments refer to Exhibit A-2 which is part of Section III.H.2.f

Renewables, Electrification & Resiliency

- All-Electric Buildings: I recommend changing this to “All Electric Heat-Pump Heated Buildings”. “All-Electric” would include electric resistance heating which is totally undesirable. More importantly, although heat pump technology has improved there is no practical electric alternative to high-cost electric resistance water heating in most multifamily buildings. A more cost-effective solution is common high-efficiency gas water heaters with owner-provided water heating. Central water heating systems also make it practical to convert to central geothermal or air source heat pump water heaters at some point in the future when these technologies are more technically and economically viable.

- Backup Power: “Critical Systems” should be defined. Is this only life safety systems or would it include heating, cooling, ventilation, water heating in common areas so that residents can shelter in place?? Are critical systems different in senior or supportive housing or other project types?
- Battery Storage Systems or Fuel Cells to serve as Backup Power: It is critical to specify the duration of battery storage backup as this has major cost implications. Battery storage for one hour backup of Critical Systems may be justifiable but for 24 hours or longer may be uneconomic. Are fuel cells a good backup power source? They require on-site hydrogen storage and, typically, the economics require full time operation.

Operations & Resiliency

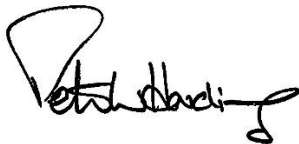
- Commissioning: This definition should specify that third-party commissioning is required. While the installing contractor should commission the systems that should not be sufficient to qualify for these points. (Note also that the same definition is in Exhibit A-1 but the word “new” in line 7 should be deleted)

Sustainable Development with Digital Literacy & Connectivity

- High-Speed Broadband Access: This term needs clarification as otherwise every project with cable TV connections can claim the points! Is a specific speed required? Is this wireless or wired? Is it free to the tenants?

Thank you for this opportunity to provide comments on the 2022/23 QAP.

Sincerely



Peter Harding
Vice President



New Ecology, Inc.
15 Court Square, Suite 420
Boston, MA 02108

May 24, 2021

Connecticut Housing Finance Authority
Attn: Terry Nash Giovannucci
999 West Street
Rocky Hill, CT 06067

RE: 2022 and 2023 LIHTC Qualified Allocation Plan Draft Redline

To Whom It May Concern:

Thank you for the opportunity to submit comments in response to the 2022 and 2023 LIHTC Qualified Allocation Plan (QAP) draft. New Ecology, Inc. (NEI) works to bring the benefits of sustainable development to the community level, with a concerted effort on underserved populations. In the capacity of green building technical assistance provider, energy model, and energy performance rater, we have been part of the project teams for multiple LIHTC projects in the State of Connecticut.

As a general comment, we support the inclusion of third-party energy efficiency and sustainability measures in both preservation and new construction projects. We also strongly recommend that in addition to the conventional cost-benefit analysis approach to energy efficiency auditing and planning, that the QAP require that both preservation and new construction projects provide a carbon emissions savings analysis for existing buildings, in the case of preservation projects, and a code-compliant baseline building design for new construction projects. This recognizes that energy cost savings and emissions reductions do not always align, and would allow the consideration of crucial carbon emissions savings in tandem with energy cost savings.

Our comments listed below are specific to the sustainable design measures for preservation and new construction projects in Exhibits A-1 and A-2 of the LIHTC QAP Draft Redline document:

Exhibit A-1 – Sustainable Design Measures: Preservation

- We applaud the aspiration for improved energy efficiency demonstrated in these requirements. Meeting regional and national carbon emissions and climate goals will require retrofitting existing buildings to markedly improved energy and emissions standards. As such, we recommend that CHFA consider the following revisions:
 - Reducing the maximum average HERS Index for preservation projects to 55 or below; and,

- Adding PHIUS+ 2021 and PHI EnerPHit certification programs as options on the list of Green Building programs required.

Exhibit A-2 – Sustainable Design Measures: New Construction

- We again applaud the improved energy efficiency required in these criteria. However, in separating Energy Conservation and Green Building criteria, the programs and standards referenced in the two subsections may be at odds with one another, or may drive projects to choose less aggressive levels of energy and emissions performance than they might otherwise. For example, the energy and emissions performance of a building exceeding its ENERGY STAR target by 35% can be dramatically worse than a building achieving a Passive House or ILFI Zero Energy Ready certification, but they are currently awarded the same number of points. And, since LEED BD+C for Multifamily v4 often requires projects comply with ENERGY STAR protocols, the criteria as written will encourage projects to maximize points by selecting LEED certification and performance at 35% below their ENERGY STAR target, in lieu of higher energy performance standards. We recommend that CHFA consider the following revisions:
 - Requiring Enterprise Green Communities 2020, National Green Building Standard Gold or LEED Gold certifiability as a prerequisite for all projects;
 - Requiring the electrification of all space heating;
 - Eliminating the separate Green Building criteria section; and,
 - Differentiating the Energy Conservation points awarded between an average HERS index at or below 42 or a 35% improvement above the ENERGY STAR target in Tier 3, and a new Tier 4 to include Passive House (either PHIUS or PHI) and ILFI Zero Energy Ready.
- We are encouraged by the addition of the Renewables, Electrification, and Resiliency and Operations and Resiliency criteria sections. However, for maintaining internal consistency in the criteria and to follow best practices for resilient multifamily housing design and construction, we recommend the following:
 - Requiring that all projects develop an Emergency Preparedness Plan for operations post-construction;
 - Requiring that all projects complete a survey of climate hazard risk at the site and design and build buildings to mitigate the hazards identified, to include at a minimum a consideration of sea level rise/storm surge flooding, precipitation and riverine flooding, extreme heat, and extreme wind; and,
 - Removing the reference to fuel cells as an optional backup power source in the Additional Additive Point section, as fuel cells run on natural gas, this is in conflict with the all-electric buildings requirement in the same section. Alternatively, creating an alternate pathway for projects using fuel cells, without an all-electric building requirement.



Thank you again for the opportunity to comment on the upcoming revisions to the 2022 and 2023 LIHTC QAP. We look forward to continued work supporting Connecticut's LIHTC-assisted affordable housing preservation and new construction projects.

Sincerely,

A handwritten signature in dark ink, reading "Edward F. Connelly". The signature is fluid and cursive, with a large, stylized loop at the end of the last name.

Edward F. Connelly, President
New Ecology, Inc.

May 28, 2021

Terry Nash Giovannucci,
CHFA,
999 West Street, Rocky Hill, CT 06067

Re: Proposed Changes to CHFA QAP, 2022

Dear Ms. Giovannucci,

Thank you for the opportunity to offer feedback on the proposed changes to the CHFA QAP for the 2022 round. We appreciate your willingness to engage with the affordable housing community on finding solutions that create the best possible outcomes for Connecticut residents.

1.a. Supportive Housing

While increasing the supply of supportive housing units across the state is a critical need, we encourage CHFA to reduce the percentage of units needed in order to score full points in this category from 20% to 10% on an individual site. This is based solely on simple supply and demand. At most of our sites we have had trouble filling our supportive housing units, while we have unlimited demand for affordable non-supportive service units. This is particularly true in Hartford where we had 1,000 applicants for 75 units. Of those 75, 15 were set aside for supportive housing families with 45 as affordable non-supportive units (the remaining 15 were market rate). Among the 1,000 applicants it was very challenging to find residents needing supportive housing but there was unlimited demand for the other 45 affordable units. We believe in including supportive service units in our developments and we retain a Pennrose-employed supportive service staff person (in addition to a 3rd party provider) in most of our CT mixed income and affordable communities— but believe the demand for such units is better reflected at a 10% level than a 20% level.

1.c. Households Above 30% of AMI and at or below 50% of AMI; and

1.d. Mixed-Income Housing

Pennrose has long been a proponent of mixed-income housing as a means of increasing economic opportunity and adding vital diversity to an area's housing stock. The QAP as currently written seeks to reward the provision of non-LIHTC ("market") units via *Criteria 1.d* - but *Criteria 1.c* makes it difficult to do so. *Criteria 1.c* awards points for units between 30% AMI and 50% AMI, calculating points based upon the percentage of these units among **all** units at the development. Adding market rate units grows the total unit count (the denominator) – thus lowering the percentage of qualifying units under *Criteria 1.c*., and forcing a developer to add even more LIHC units in order to achieve full points. Rewriting *Criteria 1.c* to calculate the applicable percentage among all **qualified** units rather than **total** units can reward the provision of these deeply affordable units, while not competing against the inclusion of market rate units that the QAP also seeks to prioritize. This may also make it easier for developments to include moderate income units that can further increase housing diversity.

4.b. Development Located in Area of Opportunity

There is an incredible need for affordable and mixed-income housing across the entire state, in all of its cities and towns. We are concerned however about the potential unintended consequences of the proposed shift to the state's new "Opportunity Map." – in that it could completely exclude more dense and urban areas. One concern is that it may diminish the feasibility of projects in most of Connecticut's largest, most dynamic, and best-connected cities, and it will encourage the development of housing in places that make less sense from a regional planning perspective - thus negating CHFA's good work on measures like sustainability, transit-oriented development (TOD), and preservation. The Opportunity Map, which is given more scoring weight than urban amenities like TOD in the QAP, effectively boosts the competitiveness of suburban development at the expense of urban projects and creates a situation where urban sites may be completely uncompetitive for credits.

The Opportunity Map incentivizes the construction of housing in communities that are less connected to job centers, transportation, higher education, and arts & culture. An unintended consequence is that Opportunity Map does not

encourage “smart growth” principles. Development in less central locations will, in many cases, isolate residents from economic networks. Walkable proximity to jobs, training, schools, and childcare is critical to economic success – opportunities that are far rarer in low-density suburban settings that score higher in the new map. Eligible residents are not rushing to leave Connecticut’s dynamic cities, but instead are applying in staggering numbers for urban affordable housing. As noted above, we received more than 1,000 applications for the 75 units in Westbrook Village Phase I, and continue to see incredible interest in units in Westbrook Village’s subsequent phases.

CHFA should be commended for its progressive and laudable approach to environmental sustainability in points categories like Sustainable Design & Energy Conservation. Smart growth principles are an equally important part of sustainability. Unfortunately, the Opportunity Map, as currently constructed appears to encourage in many places, the construction of affordable housing in lower-density locations that are more car-dependent, that require more infrastructure spending, and that put families further from goods, services, jobs and transportation. These anti-Smart Growth conditions essentially require that residents have access to a private car – often more than one per household. Pushing more residents to this type of land use is known to have negative impacts on environmental sustainability and health and wellness, and requires less efficient spending on public infrastructure than would denser, more urban development. We would encourage CHFA to make sure the Opportunity Map does not run counter to the sustainability measures it is working so hard to ensure are achieved.

Accordingly, we urge CHFA to reconsider these locational points criteria, and the unintended consequences they may cause, by either:

- Striking a more even balance between points allocated to the new Opportunity Map and points for amenities offered by better-connected, smart growth urban sites like T.O.D. (*Criteria 3.a.b*) and WalkScores.
- Rework the Opportunity Map to include access to local jobs and higher ed, walkable access to amenities like parks and grocery stores, and reliable multi-modal transportation, or
- Create a set-aside for 1-2 “High Opportunity” deals each round,

Grandfathering of Multi-Phase Initiatives

The benefits of multi-phase initiatives like the redevelopment of the former Westbrook Village and other such sites that have been master-planned around the state can be multiplicative; positive impacts on economic development, community stability, and a neighborhood’s housing diversity are maximized only when the full master plan is realized. Redeveloping Westbrook Village was a major commitment made, by the Housing Authority of the City of Hartford, the City of Hartford, and many other City and State agencies, including DECD, DOH, and CHFA. An additional unintended consequence of the changes in the QAP and the Opportunity Map in particular is that these master planned communities may no longer be able to generate points necessary to continue to receive awards to achieve full build out - leaving sites that have already been demo’d and environmental remediated, (in many cases with state resources from DOH and/or DECD or DEEP) vacant and incomplete.

With this in mind, we encourage CHFA to consider language that allows for “grandfathering” of multi-phase initiatives that have obtained site control prior to changes in the QAP. These impacts are especially acute when they relate to locational preferences; a developer may change their proposed unit mix or material choices based upon a shift in QAP standards, but they cannot move their site.

Please do not hesitate to reach out, should you have any further questions.

Respectfully submitted,

Charlie Adams,
Regional Vice President
Pennrose, LLC



Comments by Isaac Elnecave of

Phius to

Terry Nash Giovannucci of the Connecticut Housing Finance Authority
to

Possible Amendments to the 2022-2023 QAP

May 28, 2021

Phius (Passive House Institute US) is a non-profit 501(c)(3) organization committed to making high-performance passive building the mainstream market standard. Phius trains and certifies professionals, maintains the Phius climate-specific passive building standard, certifies and quality assures passive buildings, and conducts research to advance high-performance building. Buildings constructed to the Phius standard provide superior indoor air quality, resilience during power outages, and an extremely quiet, comfortable indoor environment. Project teams are increasingly adopting passive building principles and the Phius standard for single-family, multifamily, and commercial buildings to achieve Net Zero buildings.

Projects receiving the Phius 2021 certification are not only among the most energy efficient buildings but also reduce the energy burden on low-income households, ensure a healthy living environment and provide resilience as Phius 2021 buildings will maintain their indoor temperature for a much longer time than comparable buildings built to the energy code. Finally, as will be detailed below, projects built to the Passive House standard are not more expensive.

Phius appreciates the opportunity to provide comments on the suggested amendments to the Red Line version of the 2022-2023 QAP released by the Connecticut Housing Finance Authority, and **strongly supports the amendments to the *Sustainable Design Measures: New Construction* section**. Phius suggests two minor changes:

1. Under the '***Sustainable Design Measures: New Construction***' section, Phius suggests using the terms Phius and PHI instead of the term Passive House. This would provide clarity on the specific standards being required.
2. Under the '***Sustainable Design Measures: Preservation***' section, Phius suggests adding the Phius REVIVE standard under the Energy Conservation section. (See Attachment 1)

These comments will cover the following points:

1. Description of the Phius standard.
2. Reasons to include Phius REVIVE in the Sustainable Design Measures: Preservation section.

1. THE PHIUS STANDARD PROVIDES AN INTEGRATED PATH TO DEEP ENERGY SAVINGS, NET ZERO ENERGY USE AND HEALTHY, COMFORTABLE HOMES.

All buildings built to the Phius standard foreground **five** principles:

- Using continuous insulation throughout the building envelope to minimize or eliminate thermal bridging.
- Building a well-detailed and extremely airtight building envelope, preventing infiltration of outside air and loss of conditioned air while increasing envelope durability and longevity.
- Using high-performance windows (double or triple-paned windows depending on climate and building type) and doors - solar gain is managed to exploit the sun's energy for heating purposes in the heating season and to minimize overheating during the cooling season.
- Using some form of balanced heat- and moisture-recovery ventilation to significantly enhance indoor air quality.
- Minimizing the space conditioning system because of lower space conditioning loads.

Utilizing these principles provides a path for constructing a building that achieves zero source energy through the Phius ZERO standard.

Moreover, to receive certification, all residential buildings must meet the criteria laid out in these pre-requisite programs:

- Environmental Protection Agency (EPA) Energy Star Program
- EPA Indoor airPLUS program
- EPA WaterSense Program
- Department of Energy Zero Energy Ready Home program
- ASHRAE 62.2 ventilation requirements

All buildings seeking Phius certification go through a two-part process - design and construction review:

PART 1: Design Review

First, certification staff at Phius reviews construction drawings, product specifications, and modeling to ensure that the building energy use is below the stringent values specified in the standard. In addition to reviewing energy performance, building envelope components and

details are evaluated for moisture and condensation performance. After all issues are identified and resolved, the building is pre-certified (design certified).

PART 2: Construction Review

After pre-certification, actual construction is reviewed on-site by a Phius trained Rater/Verifier who ensures that the building is constructed to the pre-certified plans and that it meets the criteria of the programs listed above. If changes to the design occur, the modeling is updated, and the new energy use of the building must still meet the Phius standards for certification. This process ensures both quality construction and deep energy efficiency.

As a result, multi-family homes built to the Phius standard provide comfort, health, excellent indoor air quality, and resiliency. The passive building methodology provides a cost-effective path for achieving net-zero energy in buildings.

2. WHY TO INCLUDE PHIUS REVIVE AS AN OPTION UNDER THE SUSTAINABLE DESIGN PRACTICES: PRESERVATION.

To address the need for a deep energy retrofit standard, Phius has developed the REVIVE program (which includes both the Phius CORE REVIVE and the Phius ZERO REVIVE standards). The REVIVE standard is designed to achieve the same energy savings as the Phius CORE and Phius ZERO standards; however, as they apply to existing buildings the REVIVE standard gives allowances (on a case-by-case basis) to overcome existing conditions. **As the level of energy savings under Phius REVIVE compares favorably to the energy savings generated by the Phius standards for new construction, we suggest adding it as an option.**

3. CONCLUSION

In conclusion, Phius respectfully requests that the Connecticut Housing Finance Authority in the 2022-2023 LIHTC QAP include Phius REVIVE option as part of its Sustainable Design Measures: Preservation section. Amending the QAP in this fashion will provide developers with an option that will generate high-quality, extremely energy efficient and cost-effective low-income multi-family housing.

[1] See <https://www.masscec.com/emerging-initiatives/passive-house>

[2] *The Proof is in the Project: cost and Performance of Built Passive Multifamily*: BuildingEnergy Boston Conference; Northeast Sustainable Energy Association (NESEA), May 7, 2021.

ATTACHMENT 1:

The Phius climate-specific passive building standard guides builders to success in the design and construction of passive building. It provides a quality-and-conservation-first framework for net zero building. It is internationally applicable and grounded in building science, best practices, the quality assurance necessary to deliver optimal results.

The 2021 update marks the next step towards making net zero universal and has charged forward in two key areas: 1) New provisions that incentivize building electrification and 2) a prescriptive path for single family / townhomes intending to help facilitate greater adoption.

The standard uses cost-optimized performance targets to guide the designer to optimal levels of investment in passive conservation strategies and active conservation strategies before turning to renewable energy to achieve net zero performance. There are two main certification tiers, CORE and ZERO, which are differentiated by their target for overall source energy use. Each of these tiers has a program for building retrofits, labeled REVIVE.

Phius CORE sets a target that is challenging but achievable with conservation measures only and has both a performance path for all buildings and a limited-scope prescriptive path for new construction single family / townhomes.

Phius CORE REVIVE aligns with Phius CORE but for existing buildings, with additional allowances on a case-by-case basis to overcome existing conditions.

Phius ZERO is built upon CORE but sets the net source energy target at 0 and does not allow for fossil-fueled combustion on site.

Phius ZERO REVIVE aligns with Phius ZERO but for existing buildings, with additional allowances on a case-by-case basis to overcome existing conditions.



May 28, 2021

Ms. Nandini Natarajan, CEO
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

RE: Partnership for Strong Communities' comments on 2022 and 2023 Qualified Allocation Plan for federal Low Income Housing Tax Credits

Dear Ms. Natarajan:

Partnership for Strong Communities respectfully submits the comments below and requests your consideration as you finalize the 2020 and 2023 Qualified Allocation Plan (QAP).

We believe the QAP should achieve its funding goals through a balance of new construction in higher opportunity areas and the rehabilitation/preservation of existing affordable rental homes in distressed community areas, allowing the greatest amount of choice for low-income households to access quality housing. We know there is a great need for preservation as more than 4,800 publicly supported rental homes in Connecticut with affordability restrictions expiring in the next five years.¹ We appreciate that CHFA has separated the application process of preservation and new construction projects, given the differing needs of each.

Connecticut's rental affordability crisis for our poorest households persists. More than 100,000 rental households spend more than half of their income on housing. Ninety-five percent of severely cost burdened renters are in very low- or extremely low-income households. Even within existing Connecticut LIHTC developments twenty-six percent of tenants pay more than thirty percent of income on rent. We welcome the draft QAP increasing priority for proposed developments with a greater share of units affordable to extremely low- and very low-income households.

We ask that CHFA consider increasing the points awarded for proposals in high and very high opportunity areas. Now that proposed developments preserving affordable housing will no longer compete directly with new construction proposed developments, it is even more necessary to prioritize new affordable housing in higher opportunity areas that have relatively few affordable housing opportunities compared to Connecticut's cities.

Well-designed mixed income communities are an important tool in reducing Connecticut's distressing level of economic segregation. We ask CHFA to further encourage mixed income development proposals by significantly increasing in the number of additional points added for projects including 20% market rate units and offering even more points for units that achieve a blend of 60% affordable and 40% market rate projects. Projects that can achieve a 60%/40% mix provide greater access to social capital and avoid concentrations of poverty.

¹ <https://www.pschohousing.org/sites/default/files/inline-files/2020.2.26%20housing%20in%20ct%202020%20to%20print.pdf>



Finally, we believe the quality of applications for tax credits will be strengthened with a process that results in a greater and more diverse group of qualified applicants. In our view, criteria from earlier QAPs unnecessarily restricted the number of developers that could submit a successful application. We ask CHFA to consider ways to expand the pool of qualified applicants for the 2022 - 2023 QAP, including by again considering:

1. Removing points for 90% drawings to reduce upfront costs – especially for projects in high opportunity areas;
2. Removing prior planning and zoning approval for projects in high opportunity areas;
3. Building on the success of your Developer Engagement Process with a robust pre-application that identifies and guides projects that are at an early stage and not ready for competitive review. Given the high cost of application submission, it is critical that developers and the agency work together to avoid costly unsuccessful applications.
4. Creating more opportunity for smaller-scale developers, especially in high opportunity areas, setting a minimum threshold for the number of projects and years' experience required of applicants without additional points for experience beyond these thresholds.

We appreciate CHFA's continued leadership in providing affordable and supportive housing in Connecticut. We also appreciate the opportunity to engage with CHFA around the QAP and ways that we can work together to advance the goals of ending homelessness and expanding housing choice. As 2022 will be the first year of a two year QAP, we think it would be valuable for CHFA to solicit feedback on the process after the 2022 award notifications. Thank you for your consideration of our comments. Please feel free to contact us with any questions you might have.

Sincerely,

Sean Ghio
Policy Director
Partnership for Strong Communities

May 28, 202

Terry Nash Giovannucci
Connecticut Housing Finance Housing
999 West Street
Rocky Hill, CT
06067



architecture
planning . interiors
henry schadler, aia
paul sel nau, aia

Project:

Re: Sustainable Measures in Connecticut's
2022 -2023 LIHTC Qualified Allocation Plan

Dear Terry:

I would like to thank you and all at CHFA for their continued commitment to affordable housing and maintaining funding for the renovation and creation of new Sustainable Housing units. The hard work done by all stakeholders is evident in the 2022 -2023 draft QAP.

Working with our non-profit clients during the firm's 45-year history, we've had several projects constructed using a variety of State Funding programs. Our most recent project, 340 Dixwell, was awarded LIHTC funding in the last round. I mention this because it will be the first Passive House, CLT, Affordable Housing development in the area. This resilient, sustainable, and highly energy efficient development would not have been possible without the continued diligence and expansion of the Energy measures incorporated in the QAP.

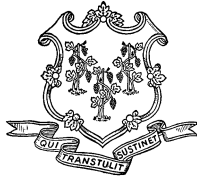
It was my pleasure to provide input on the proposed draft to CHFA's Sustainable Working Group through the P2P Working Group. The outcome as outlined in the Sustainable Design Measures found in Exhibit A-2 reflects the input of several stakeholders. This well thought out, forward thinking QAP will insure our publicly funded affordable housing development stay on track towards meeting the State Energy Goals and the AIA 2030 commitment.

I am in full support of the Sustainable Design Measures in Exhibit A-2 and remain heavily involved in implementing and promoting these principles.

Sincerely,

SCHADLER SELNAU ASSOCIATES, PC

Paul H. Sel nau, AIA, CPHC©
Architect / Vice President



State of Connecticut
HOUSE OF REPRESENTATIVES
STATE CAPITOL
HARTFORD, CONNECTICUT 06106-1591

REPRESENTATIVE JILLIAN GILCHREST
18TH ASSEMBLY DISTRICT
LEGISLATIVE OFFICE BUILDING, ROOM 5007
CAPITOL: (860) 240-8585
FAX: (860) 240-0206
E-MAIL: Jillian.Gilchrest@cga.ct.gov

MEMBER
APPROPRIATIONS COMMITTEE
ENERGY & TECHNOLOGY COMMITTEE
PUBLIC HEALTH, VICE CHAIR

May 27th, 2021

Dear Ms. Nash-Giovannucci,

As a State Representative of West Hartford, I am writing to advocate for a change in the CHFA's proposed Qualified Allocation Plan (2022-23) for the 9% low-income housing tax credit program. In particular, I hope for section 4.b to enable legacy, age-restricted, existing affordable housing programs from nonprofits to qualify for the LIHTC program.

In addition to encouraging non-age restricted, multi-bedroom developments, I ask that CHFA also add a provision to section 4.b to award points to projects where the development is part of the preservation of existing units, adds additional housing stock and any resident restrictions, including age-restrictions, are existing and in force as a requirement of the existing housing development.

The West Hartford Fellowship Housing has provided quality affordable housing for seniors in the Bishops Corner neighborhood of West Hartford for over four decades. In this program which is so vital to the the WeHa district, we have supported a diverse population, many of whom are low-income. Sixty percent of the residents live on an income of less than \$1,350 per month, and more than twenty percent live on less than \$800 per month. Thirty-seven percent receive SSI benefits, and thirty-six percent receive food stamps. The property is always fully occupied and serves our neediest population, comprising of elderly and handicapped residents.

Despite excellent custodianship, the West Hartford Fellowship Housing apartment units are in serious need of modernization and redevelopment. As such, the Board has received unanimous approval for major redevelopment by the Town Council. The plans include updates to the size and types of units, additional community spaces, energy efficiency upgrades and handicap accessibility. Despite the market appeal and cost of these changes, the nonprofit aims to maintain an 80% affordable unit ratio.

For over the last decade, the QAP has included a strong scoring preference for non-age-restricted, multiple bedroom housing developments. West Hartford remains committed to adding affordable housing for families. As such, I recommend and request that the redevelopment of existing nonprofit housing with a proven record of providing age-restricted affordable housing should also be competitive in the upcoming QAP.

Thank you for your time and consideration, I can be reached at jillian.gilchrest@cga.ct.gov and 860-240-8583. I look forward to working together.

Sincerely,

A handwritten signature in black ink, appearing to be 'JG' with a stylized flourish.

Jillian Gilchrest,
State Representative
Connecticut's 18th District of West Hartford

SENATOR DEREK SLAP

Fifth District

Legislative Office Building
Room 1000
Hartford, CT 06106-1591
Capitol: 860-240-1436
www.senatedcms.ct.gov/Slap



State of Connecticut
SENATE

Chair
Higher Education & Employment
Advancement Committee

Vice Chair
Environment Committee

Member
Aging Committee
Finance, Revenue & Bonding Committee
Government, Administration and Elections
Committee

May 27, 2021

Terry G. Nash-Giovannucci
Manager 2, Planning, Development & Evaluation
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Re: Comments on the 2022-2023 Qualified Allocation Plan

Dear Ms. Nash-Giovannucci,

I am writing to respectfully ask the Connecticut Housing Finance Authority to modify its proposed 2022-2023 Qualified Allocation Plan for the 9% Low-Income Housing Tax Credit program.

The modifications would include language changes to section 4.b of the QAP to enable legacy, age-restricted, existing affordable housing run by nonprofit organizations to qualify for the 9% LIHTC program and add a provision to section 4.b that would award points to projects where the development is part of a preservation of existing units and that currently have resident restrictions, including age restrictions that are in place as a requirement of the existing housing development. These changes would allow nonprofit organizations like the West Hartford Fellowship Housing to qualify for this program, helping this organization maintain their promise of offering affordable housing.

For more than fifty years, the West Hartford Fellowship Housing has been an integral member of our community, providing quality housing to our diverse population of residents, including those who identify as racial minorities, residents with financial limitations, and young and/or disabled residents. The WHFH development is also located near Bishop's Corner, where residents have access to the town library, senior center, a post office, grocery stores, pharmacies and medical offices.

SENATOR DEREK SLAP

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SENATE

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Environment Committee

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Government, Administration and Elections
Committee

However, as building and accessibility standards have changed, the WHFH has realized that their units cannot support the necessary lifestyle for their residents. Currently, their units lack washer/dryers, have small kitchens and little to no storage space, complicating conditions for residents with disabilities and other challenges. Although the WHFH have made changes, their second-floor units cannot be modified to be handicapped accessible.

In response, the WHFH has begun a town approved redevelopment plan to maintain their affordable housing and improve the lives of their residents. The new development will have six multistory buildings, with 23 542 sq. ft. efficiencies, 178 711 sq. ft. one-bedroom units and 55 844 sq. ft. two-bedroom units and ensure all their units can be accessible.

The nonprofit is seeking to ensure that at least 80% or more of their units remain affordable. Therefore, it is imperative for the CHFA to modify section 4.b of the program with the proposed changes. The WHFH cannot build this much needed redevelopment without access to the 9% LIHTC program funding.

As West Hartford's state senator and a member of the legislature's aging committee, I see firsthand the need to support older members of our communities. Affordable, safe and secure housing is critical for older residents and the WHFH has been an integral partner of this effort. I deeply appreciate all that CHFA does for the affordable housing community. However, to ensure we can continue to provide for the growing need of this community, CHFA must allow organizations like the WHFH to be candidates for this program.

If there are any questions concerning my statement, please feel free to contact me at derek.slap@cga.ct.gov or (860) 240-1436.

Sincerely,

A handwritten signature in black ink, appearing to read "Derek Slap".

Derek Slap

5th Senate District

May 28, 2021

Ms. Nandini Natarajan, CEO
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Dear Ms. Natarajan,

The Community Builders is pleased to submit comments on the 2022-2023 Draft of Connecticut's Qualified Allocation Plan (QAP) for the Low-Income Housing Tax Credit Program.

The Community Builders has developed 13,000 units of housing across 14 states, and each development is unique to the community and population served. We do our best work in partnership with the communities in which we provide housing, by structuring our projects around what the community and residents need. TCB has been building communities in Connecticut for over twenty years, having constructed or preserved close to 900 quality housing units throughout Hartford, New Haven, Torrington, and Vernon, and we are embarking upon a multi-phase, intergenerational redevelopment opportunity in Enfield in partnership with the Felician Sisters. In addition, TCB, through its subsidiary TCB CDE, has allocated \$2.5 million in new market tax credits to construct the headquarters of a New Haven non-profit that serves the needs of low-income people with mental and health disabilities in the surrounding community.

We would commend the changes that have been proposed in the recent QAP Draft, as it takes critical steps toward a more nuanced pipeline of housing development that is less prescriptive, and more responsive to Connecticut's housing needs. Specifically:

- *Preservation Classification* - The introduction of a new Preservation Classification of 25% will support the state's preservation goals by allowing for existing multi-family housing with great needs to have the opportunity to compete for 9% credits. Particularly as the State of CT Department of Housing has paused their 4%/Soft Rounds, it is important to have an option that could support and finance preservation deals in the state, including those with great rehabilitation needs, ones with municipal support, and existing LIHTC projects that should be preserved. These changes will better support improvements to the affordable housing inventory, many of which are located in urban centers, and which otherwise would be at jeopardy of loss due to age and lack of capital. It is unclear, however, if projects in this category will still be subject to the new construction ranking or prioritized only by the listed factors in section D. We believe that further clarity on the ranking criteria will result in projects that better meet the intent of the Preservation Classification. Furthermore, the incentive to create a rehabilitation scope around energy efficiency goals aligns with TCB's thinking on how we should approach improving our existing developments for long term use and sound operations.

- *Additional options to meet Sustainability Measures* – TCB supports the improved clarity and scoring options to introduce different sustainability measures into housing developments as shown in Exhibits A-1 and A-2. The proposed changes incentivize sustainable development of a wider variety of projects including adaptive reuse and historic preservation projects with the proposed tier system. We believe this will ultimately do more to preserve and renovate existing buildings already served with infrastructure, and which often have public transportation options and nearby schools, representing in many ways the *greenest* approach to solving the state's housing crisis. We hope that CHFA will keep the proposed tiers and scoring for sustainability and energy efficiency, and also track outcomes on all of these programs to better evaluate the effectiveness of emerging energy efficiency technology.
- *TOD Definition* - The expansion of the definition of TOD to include amenities within two miles of a site, regardless of a mixed use development, will allow for a wider variety of projects in more of Connecticut's cities and towns, particularly those high-opportunity communities where transit access is limited, to receive these points. As noted below, we would encourage CHFA to increase the point categories for TOD to go even further in order to better support affordable multifamily development in town centers and urban environments. We are optimistic, however, that the additional language to include other public transit facilities and built environment considerations will allow factors such as bus access, walkability, or bike transportation to all be factored into the scoring for TOD.

We support CHFA's two-year approach to QAP changes for the 2022-2023 QAP which will allow The Community Builders and the broader development community to be able to better implement the state's housing goals through better planning and execution of our pipelines. With the two-year timeframe in mind, we urge CHFA to consider additional changes to the following areas:

- 1) *Encourage Senior Housing*— Senior Housing remains a critical housing need both within the State of Connecticut and nationally, yet the Area of Opportunity point system requires non-age restricted units with 50% or more of the units with 2+ bedrooms. This language is exclusionary to both seniors and also individuals of all ages who may have great needs. It also disincentivizes production of smaller units, when the market shows that there is increased demand for such unit types. At a time in which federal funding for senior housing is becoming more widely available through the HUD 202 program, there are opportunities for the state to prioritize projects which can leverage significant federal funding for our cities and towns. We encourage CHFA to reconsider these constraints and to consider, perhaps as a Classification, the funding of senior housing-only developments or senior housing in a planned setting along with family housing to support an intergenerational approach, as a strategic component of a comprehensive affordable housing strategy for the state.
- 2) *Partner with the Department of Housing on 4% rounds, process, and volume cap requests* – Connecticut benefits from a two-agency approach to meeting affordable housing goals that ensures efficient allocations of the Federal LIHTC program through CHFA and the leveraging of critical funding through the Department of Housing. Since the expiration of the CHAMP rounds,

however, the coordination with the State Department of Housing around 4% transactions, soft applications, volume cap, and process, has become increasingly unclear. We encourage greater transparency around evolving policy and process considerations. For example, CHFA and DOH could consider the same pre-application forms for 9% and 4% rounds with responses clearly communicated to applicants about whether they will be invited into full rounds. Additionally, 4% LIHTC/DOH soft projects should have the ability to secure both volume cap and DOH financing simultaneously or in a coordinated way. Similarly, we encourage CHFA to integrate the administering of rental or operating subsidies into the QAP process, to ensure that funded developments receive the subsidies needed to target deeply affordable units, which ensures that these subsidies are going to viable projects. We would discourage policies that limit the number of open applications per developer, as it does not allow for funding based on the merits of a project to further CT's housing goals, especially when delays to closings are often out of developers' control. Ultimately, procedures and limitations that are being adhered to should be transparent and stated clearly in the QAP or NOFA's, and we ask for consistency between CHFA and DOH.

- 3) *Implement a Cap on High Opportunity Projects* - As changes to the QAP scoring begin to address the limitations faced by high-opportunity area projects, such as expanding TOD definitions and designating a new construction classification, we recommend considering a cap on the number of high opportunity projects awarded in any round. Connecticut's urban communities offer significant potential for revitalization in the state, and affordable housing is a key opportunity for investment in many of these communities. While affordable housing is greatly needed in the higher opportunity suburbs and rural communities of Connecticut, and certainly the State's 8-30g statute is a necessary tool to begin to address exclusionary zoning throughout the state, we ask that CHFA continue to evaluate whether the Opportunity points system and updated map favors development in suburbs over smart growth areas in cities. We support policy that encourages affordable housing development as a strategy to revitalize struggling working-class communities and urban downtowns that already have significant infrastructure, public transit, and support systems in place to benefit residents, especially since the increasing levels of real estate investment we are seeing in urban markets often puts existing low-income residents at risk of displacement.
- 4) Finally, we encourage CHFA to continue to explore updates to:
 - a. *9%/4% Financing Structure* – this is a creative solution that developers are leaning into across the country in response to constrained resource environments, and we would encourage a more flexible and coordinated approach to underwriting and processing of these projects which will make them easier to execute in the state.
 - b. *Transit Oriented Development* – we encourage CHFA to go deeper with these points, to encourage smart growth goals and offset the high opportunity points that skew towards suburban development.
 - c. *Transparency and departure from the Opportunity Map* – We understand that the Opportunity Map is a valuable tool for encouraging projects in high opportunity areas; however, is unclear how the changes to the map over the past year were made or why. The unintended consequence of relying on this map tool is that CHFA may be overlooking strong

projects in areas of the state that are not the strategic focus, or even specific sites that are adjacent to high opportunity areas in which residents would still benefit.

- d. *Brownfields Criteria* – We urge CHFA to consider expanding the brownfields criteria to include projects with significant remediation needs, such as those subject to the property transfer act or regulations under The Toxic Substances Control Act (TSCA), but that are not listed on the State Brownfields list. Many historic buildings and sites pose health and safety risks to residents and the broader community if remediation is not undertaken, but are not eligible to apply for Brownfields funding under current DECD policies.
- e. *Preservation Criteria* – as mentioned above, greater clarity around the ranking and selection of preservation projects would be beneficial. Further, item #4 in the ranking that prioritizes areas with less than 10% assisted and deed restricted housing does not seem to align with the goals of using the 10% threshold to encourage housing production. We believe this is counter-productive to maintaining existing affordable housing in communities that have met this goal. We would instead encourage a metric that prioritize deep affordability to ensure that units are not lost for the most vulnerable populations in the state.

We are grateful for CHFA's responsiveness to the comments and concerns expressed by The Community Builders and others in the affordable housing industry. The draft QAP makes many improvements that will benefit our communities and the residents we serve. The Connecticut Housing Finance Authority continues to be a tremendous organization addressing the housing crisis in the state, and we look forward to learning more about the future policy directions that will guide housing development in the years to come.

Thank you for this opportunity to provide comment.

Sincerely,



Rachana Crowley
Director of Real Estate Development
The Community Builders, Inc.



Ms. Terry G. Nash-Giovannucci
Manager 2, Planning, Development & Evaluation
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Re: Comments on the 2022-2023 QAP

Dear Ms. Nash-Giovannucci:

I submit these comments to ask that the Connecticut Housing Finance Authority (CHFA) modify its proposed 2022-2023 Qualified Allocation Plan (QAP) for the 9% Low-Income Housing Tax Credit (LIHTC) program. I respectfully request CHFA to modify section 4.b of the QAP in such a manner to enable legacy, age-restricted, existing affordable housing run by nonprofit organizations to be competitive to qualify for the 9% LIHTC program. In addition to encouraging non-age restricted, multi-bedroom developments, I ask that CHFA also add a provision to section 4.b to award points to projects where the development is part of the preservation of existing units, adds additional housing stock and any resident restrictions, including age-restrictions, are existing and in force as a requirement of the existing housing development.

For more than fifty years, West Hartford Fellowship Housing has provided quality affordable housing for seniors in the Bishops Corner neighborhood of West Hartford. WHFH boasts a racially and financially diverse population, typically with minimal financial resources. Sixty percent of the residents live on an income of less than \$1,350 per month, and more than twenty percent live on less than \$800 per month. Thirty-seven percent receive SSI benefits, and thirty-six percent receive food stamps. The property is always fully occupied and serves our neediest population, comprising of elderly and handicapped residents.

Although well-maintained, the WHFH apartments are obsolete in just about every metric. Thus, with resident support, the WHFH Board obtained unanimous Town Council approval for a major redevelopment of the property. The approved redevelopment plans improve the property at every level, from the size of the units to the unit mix, including two-bedroom apartments, more community space, introducing energy efficiency elements, and ensuring all units are handicapped adaptable. The nonprofit nonetheless is seeking to ensure that at least 80%, if not more, of the units, remain affordable.

For over the last decade, the QAP has included a strong scoring preference for non-age-restricted, multiple bedroom housing developments, and West Hartford has certainly taken advantage of that preference through a number of projects. We remain committed to adding affordable housing for families. We submit, however, that in addition to this important goal, the redevelopment of existing nonprofit housing with a proven record of providing age-restricted affordable housing should also be competitive in the upcoming QAP.

We deeply appreciate all that CHFA does for the affordable housing community. We ask that CHFA modify its requirements for the 9% LIHTC program to support both family housing developments and redevelopment of legacy, affordable, age-restricted housing developments.

With best regards,

A handwritten signature in black ink, appearing to read "Shari Cantor". The signature is fluid and cursive, with the first name "Shari" and last name "Cantor" clearly distinguishable.

Shari Cantor
Mayor, Town of West Hartford

West Hartford Fellowship Housing

May 25, 2021

Ms. Terry G. Nash-Giovannucci
Manager 2, Planning, Development & Evaluation
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Re: WHFH Comments on the 2022-2023 QAP

Dear Ms. Nash-Giovannucci:

As a long-standing non-profit housing provider within the Town of West Hartford, West Hartford Fellowship Housing's (WHFH's) mission is to continue to provide quality affordable housing for senior and young disabled individuals.

Unfortunately, as a 50-year-old development, our apartments are far below the standards our residents deserve. With significant resident input, we gained our Town Council's unanimous support for an innovative and modern redevelopment plan that will provide updated facilities at affordable rates. We ask that the proposed 2022-2023 Qualified Allocation Plan (QAP) be modified to permit legacy, age-restricted organizations such as ours to compete for funding.

Specifically, we request that the proposed language of section 4.b of the QAP be further modified as follows:

The current language in the QAP reads: Development Located in Area of Opportunity. For purposes of the Plan, "Development Located in an Area of Opportunity" shall mean a Proposed Development with either (i) non-age restricted units of which more than 50% of the Proposed Development's total units contain two or more bedrooms, and that is located in a municipality with: measured improvements in family outcomes in education, employment and neighborhood domains; or (ii) units where the development is part of a preservation of existing units, adds additional housing stock and any resident restrictions are existing and in force as a requirement of the existing housing development.

Points will be awarded in accordance with DOH/Authority "Opportunity



Map” published on the Authority’s website, as follows. Please see the Opportunity Characteristics Guideline for further detail.

In the alternative, we would propose section 4.b be modified as

Development Located in Area of Opportunity. For purposes of the Plan, “Development Located in an Area of Opportunity” shall mean a Proposed Development ~~with non-age restricted units of which more than 50% of the Proposed Development’s total units contain two or more bedrooms, and~~ that is located in a municipality with: measured improvements in resident and family outcomes in education, employment, and neighborhood domains. Points will be awarded in accordance with DOH/Authority “Opportunity Map” published on the Authority’s website, as follows. Please see the Opportunity Characteristics Guideline for further detail.

For over the last decade, the QAP has included a strong scoring preference for non-age-restricted, multiple bedroom housing developments and most if not all funded projects met that criteria. We believe that in addition to this important goal, the redevelopment of existing non-profit housing with a proven record of providing age-restricted affordable housing should also be encouraged in the upcoming QAP. We understand the need for affordable family development but ask that you recognize that by providing such a strong scoring advantage for non- age-restricted development to the exclusion of all others, critically needed redevelopment of long-existing, non-profit, affordable age-restricted housing simply is not viable. Please accommodate both needs in the upcoming QAP.

WEST HARTFORD FELLOWSHIP HOUSING

WHFH is and has historically been fully occupied. As of today, we have roughly 134 people waiting for an affordable apartment and roughly 200 people who qualify for Section 8 assistance/subsidized apartments. With only 212 apartments, 60 project-based subsidy vouchers, and zero vacancies, it is apparent that the need to increase affordable housing vacancies and anti-poverty programs in West Hartford is essential. Our office receives phone calls daily from seniors eager to gain access to our on-site resources and are desperate to have a peaceful, convenient community to call home.



20H Starkel Road · West Hartford, CT 06117 · Tel: 860-523-0881 · Fax: 860-523-0891

Email: Mark Garilli · Executive Director · mgarilli@whfhdevelopmentcorp.org



For the past fifty years, WHFH has served a racially and financially diverse population, typically with minimal financial resources. Approximately twenty percent of the subsidized housing residents are young and disabled, with the remaining subsidized housing units being occupied by elderly residents. Sixty percent of our overall residents live on income at less than \$1,350 per month, and more than twenty percent live on less than \$800 per month. Thirty-seven percent receive SSI benefits, and thirty-six percent receive food stamps. Approximately one-third of our residents identified themselves as minority and just over fifty percent identified as white. The identified gender divide is sixty percent women to forty percent men, with approximately less than one percent identifying as other.

The first phase of our development was built in 1970, in response to a growing need for local affordable housing options for an aging population. The development was made possible by a 40-year mortgage with financing through the U.S. Department of Housing and a 75-year ground lease establishing a special development district preserving the property for age restricted housing. This first phase included 46 efficiency units and 52 one-bedroom units, spread among 12 one- and two-story buildings, with a small, stand-alone office and community building. We have since paid off the mortgage and continue to provide affordable housing under the provisions of our ground lease.

At the time of our initial development, the expectation was that residents would stay there one-to-four years and move on. Our experience is that our residents tend to stay much longer, typically for decades, leaving only when their medical conditions require it. The buildings were not designed for long-term residency. The walls are cinderblock, with little to no energy-efficiency benefits. Even by the standards of the time, the units are tiny—325 s.f. for efficient units and 395 s.f. for one-bedrooms. The kitchens are minimal and none of the units have washer/dryers. There is almost no storage space.

A handful of the units have been retrofitted to be more handicapped-accessible, but none of the units were built to today's standards for accessibility. Indeed, with no elevators in any of the buildings, the second-floor units cannot be modified to be handicapped-accessible.

Our second phase of the development was built in 1975, with 70 one-bedroom units, spread among an additional 10 one- and two-story buildings. We financed the second phase through CHFA and paid the mortgage in full a couple of years ago. Once again we continue to deliver on our promise of affordable housing under



the provisions of our ground lease. In the 1975 buildings, the units are marginally larger at 485 s.f. They nonetheless are not handicapped accessible, lack washer/dryers, have tiny kitchens and practically no storage space. The buildings have little to no energy-efficiency elements.¹

REDEVELOPMENT AND EXPANSION OF EXISTING AFFORDABLE HOUSING

Free of our mortgage obligations for 23 of our 24 buildings, WHFH has embarked in a comprehensive redevelopment strategy which will provide up to an additional 88 affordable housing units to the Bishops Corner community in West Hartford. With the goal of maintaining the park-like beauty of the existing 9+ acre development and to improve the physical and social conditions for our residents, we have developed architectural plans to raze 23 buildings and replace them with six multistory buildings. We have obtained full local municipal approvals for the project, as well as traffic approvals from the Department of Transportation. We intend to have at least 80% of the units to be designated as affordable.

Located in the heart of Bishop's Corner at Starkel Road, WHFH is across the street from the West Hartford Library and Senior Center. It is in walking distance to a post office, three grocery stores (Big Y, Crown Market and Whole Foods), three pharmacies (Walgreens, CVS, and Target), two department stores (Target and Marshalls), various medical offices and clinics as well as a number of restaurants. It is located on two bus lines and a state road. The location is more than ideal and could easily be fully developed with for-profit market housing. Indeed, a for-profit, high-end market rental property (Bishop's Place) abuts the WHFH property.

Our town-approved redevelopment plan anticipates a total of 23 efficiencies, 178 one-bedroom units, and, new with this redevelopment, 55 two-bedroom units. We would be replacing our existing 168 units from our first two developments with a total of 256 units, in four phases. We are substantially improving our residents' experiences, as the square footage would be increased to 542 s.f. for efficiencies, 711 s.f. for one-bedrooms and 844 s.f. for two-bedrooms. All of the units will be handicapped adaptable, and many will be handicapped accessible. We include more storage space, more usable common spaces, and the ability to have washer/dryers in each unit. The redevelopment will also let us become energy

¹ In our third phase, we developed a single, three-story building with 43 affordable units and the lease expanded to elderly and non-elderly handicapped with low and moderate incomes. This building will be upgraded as part of our redevelopment but will not be replaced.



efficient. We have followed passive house development standards and are pursuing every possible green initiative available. The redevelopment will allow us to replace our obsolete housing stock that lacks proper thermal barriers, inefficient baseboard electric heat, with housing that can take full advantage of renewable energy systems, high speed internet and sustainable programming.

Our four-phase redevelopment project has received full approvals with resident support and anticipation. We are looking for funding for phase one. In our first redevelopment phase, we would demolish three single-story buildings, removing 22 units. We would then build a three-story building, with an elevator, with 65 new units and new expanded common spaces for community services and programs. This is the only phase where we would need to displace residents. In future phases, residents would be relocated into the newly built, prior phase building.

But we cannot build it without funding. Paramount to our expansion process is access to 9% LIHTC's which are the primary driver in the creation of new affordable housing units. From our due diligence, it has become apparent that the rating and ranking process under the current QAP is highly competitive and gives preference to those developments without an age restriction and with 50% or more two-bedroom units—in other words, the requirements of section 4.b serve as the gatekeeper as to whether a project will be financed. As such, we have been told that our ability to be successful in applying for 9% LIHTCs as age restricted makes our expansion of affordable housing almost impossible. We ask that you modify the QAP requirements to make the critical redevelopment of legacy, age-restricted affordable housing to be competitive for 9% LIHTC funding.

CONCLUSION


We know that approximately 18% of West Hartford Residents are over the age of 65. Nationally the demand research reveals, the number of individuals aged 65 and older is projected to increase annually by 12 percent, promising the senior population will double by the year 2030. Thirteen percent of all households are headed by people 75 years of age and older and 40-50% of those same households are supported by annual incomes of less than \$25,000.00. Based on our data and experience, this population of individuals will continue to have a strong need for affordable housing assistance. Simultaneously, many of these applicants have a history of physical and/or mental disabilities, which only heighten their need for financial assistance and anti-poverty programs. Considering the well-being of our

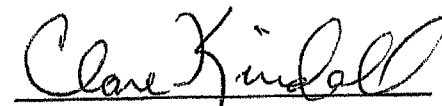


residents and the high demand for vacancies for prospective residents, WHFH truly understands the demands for more affordable, safe housing for seniors and handicapped residents.

In the Plan's focus on non-age restricted, multiple bedroom developments, it has made redevelopment of legacy, nonprofit, age-restricted affordable housing developments nearly impossible. We respectfully suggest that it need not be "either or" but can and should be "both and." Please modify section 4.b of the proposed draft QAP for 2022-2024 to permit redevelopments such as WHFH to be viable candidates for the 9% LIHTC program. We appreciate all that CHFA does for the affordable housing community and hope that the minor but critical suggested change to the QAP will allow us to partner with CHFA in the creation of new affordable housing units in West Hartford.

Respectfully submitted on behalf of West Hartford Fellowship Housing, Inc. and WHFH Development Corp. (both non-profit corporations),


Leon Davidoff
President
West Hartford Fellowship Housing, Inc.


Clare Kindall
President
WHFH Development Corp.



May 26, 2021

Ms. Nandini Natarajan, CEO
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Dear Ms. Natarajan,

We are writing in response to the call for comments on Connecticut's draft 2022-2023 Qualified Allocation Plan (QAP) for the State's Low-Income Housing Tax Credit (LIHTC) program. As mentioned in the comments we submitted in December, our organization owns and operates nine LIHTC projects across Connecticut, comprising 1,600 units of housing, and is an experienced LIHTC developer active throughout New England and the Mid-Atlantic.

We would like to thank the CHFA for considering our suggestions as it has formulated this draft QAP. As it currently stands, the draft makes two changes that we had encouraged in our letter dated December 23. First, the current draft broadens the definition of "transit-oriented" from the previous QAP's language—unlocking LIHTC funds for additional sites with excellent transit connectivity. Similarly, the current draft awards points based on nearby amenities rather than only for on-site commercial components. This change recognizes that walkable urban communities can be created by developing housing adjacent to already-present commercial districts—and allows developers to focus on creating quality housing rather than requiring them to include on-site retail, which would have imposed significant risks and complications in the post-COVID environment.

We enthusiastically welcome these aspects of the draft QAP. At the same time, we have suggestions for improving several other parts of the draft.

Preservation Set-Aside

Our first suggestion is regarding the new "Preservation" classification laid out in Section III(C) of the draft. While we agree that preserving existing affordable housing is a key objective, we feel that specifically planning to reserve 25% of each year's awards for the Preservation category may have unforeseen consequences. We are convinced that, in most years, significantly fewer than 25% of viable and attractive applications will fall into the "Preservation" grouping. Based on our experience, we expect that most preservation and rehabilitation projects will seek funding through 4% LIHTC awards and other funding opportunities rather than entering the competitive 9% process. At the same time, we



anticipate that reserving 25% of awards for preservation will disadvantage the production of new affordable housing—an undertaking that is already extremely challenging.

The draft does introduce some flexibility by noting that “the amount of annual awards or reservations made in each Classification may vary depending on relevant considerations and limitations.” To bolster this flexibility and prevent disadvantaging new housing, we suggest that the final version of the QAP make clear that 25% is an upper limit rather than a strict target or a minimum. Doing so will both provide clarity to applicants and maximize CHFA’s room for discretion.

On-Site Resident Services Coordinator

Our next suggestion regards the draft’s suggested scoring for on-site resident services coordinators, outlined in Section III(H)1(f). As a developer and long-term owner committed to the well-being of our residents, Winn has won national and statewide recognition for the quality of resident services we offer, excelling in areas from employment and economic mobility to health and community engagement. These accolades include certification by Stewards of Affordable Housing for the Future (SAHF) and Fannie Mae for “robust commitment, capacity, and competency in providing outcomes-focused resident services in affordable rental housing,” as well as the 2019 Connecticut Apartment Association (CTAA)’s Nutmeg Award for Management Company of the Year.

This experience has taught us that delivering the highest quality resident services does not always require a full-time, on-site coordinator. Rather, to offer a consistent service level that can be maintained year-in and year-out, despite the financial constraints facing developers and owners of affordable housing, the best practice is to efficiently share staff across properties. This avoids the prohibitive costs of maintaining a full-time, on-site coordinator at every property, and minimizes redundancy and replication of effort.

We suggest that the final scoring offer the same number of points to applicants proposing part-time and full-time on-site resident services coordinators. This would allow the scoring to focus on the quality of services offered—not the hours spent providing these services. For example, points could be awarded for an applicant’s service plan and for the scope of services proposed. This is the approach taken by the Federal Home Loan Bank of Boston in its scoring of affordable housing applications; points are offered for each service type an applicant demonstrates will be available. By similarly focusing on services offered, CHFA would incentivize applicants to focus on what matters most: securing the best possible support and opportunity for residents.



Sustainable Design

We also would like to express our concerns with proposed changes to the “Sustainable Design” scoring, outlined in Section III(H)2(f). As currently formulated, the draft strongly disincentivizes Passive House designs. This is because of the separate points for “energy conservation” certifications and “green building” certifications. As currently written, projects will elect a HERS/ENERGY STAR target from “Energy Conservation”, rather than Passive House, to better integrate with complimentary “Green Building” standards for maximum points.

Based on our experience, it is unrealistic for Passive House projects—which feature superior energy and low-carbon performance, EPA Indoor airPLUS compliance, and rigorous inspections, testing, and verification—to pursue an *additional* Green Building certification standard when the points available for less stringent pathways are the same. For Passive House projects, Green certification would impose significant additional soft costs and administrative work associated with duplicative documentation with no sustainability benefits. As a result, if the proposed draft is adopted, very few applicants will feature Passive House designs, reversing recent progress toward decarbonization goals.

In order to avoid such an outcome, we suggest allowing an alternative scoring option under “Green Building” only for projects pursuing Passive House certification. Projects committed to pursuing Passive House certification should be permitted to demonstrate specific green building practices, such as water conservation, material selection, construction waste management, and site design, in a design affidavit prepared by a 3rd party design professional. Taking this approach would avoid the unrealistic costs of adding a second Green Building certification for Passive House projects and more effectively distinguish the Energy Conservation points from the Green Building points, reducing unnecessary soft costs and duplicative efforts.

Beyond this suggestion relating to Passive House, we applaud CHFA’s efforts to promote renewable energy, electrification of buildings, and resiliency, but have additional concerns regarding the feasibility of the items for which points are being given. Winn has made a push in recent projects to advance electrification of systems as much as possible. We have found that the technology for domestic hot water heating has not advanced far enough to efficiently provide centralized hot water heating using electric applications. Gas-fired centralized hot water heating remains the most cost effective and energy efficient way to provide domestic hot water. We continue to monitor the marketplace for new technologies that may provide an electric option, and are eager to implement them when they become available. Until that time, we request that CHFA not issue scoring points for an all-electric building, or at minimum allow a carve out for centralized gas domestic hot water heating.



Further, we recognize that battery technology has advanced significantly in recent years. However, building codes do not yet allow for batteries to replace emergency generators that otherwise operate on fuel. So while we support the promotion of battery technology in new buildings, at this time the addition of batteries would be additive to projects, rather than replacing older outdated technology. We request that CHFA consider postponing implementing this change until building codes allow usage of battery technology as a replacement alternative to generators.

Opportunity Characteristics

Finally, we would like to offer a suggestion regarding the draft's proposed scoring for a "Development Located in Area of Opportunity," laid out in Section III(H)4(b). The proposed changes to this section would cause certain sites that were previously considered "high opportunity" to be re-classified as "low opportunity," damaging their ability to access LIHTC awards even as their underlying characteristics remain the same. For example, the proposed Campbell Grain redevelopment in the Pawcatuck section of Stonington, Connecticut, is considered "high opportunity" under the existing rules, because it lies in a district with excellent public schools, offers access to a nearby community college, and is located in a town with a below-average poverty rate. Even though the proposed new scoring treats it as "low opportunity," the site objectively offers a high level of opportunity to prospective residents—a reality reflected by its score under the CHFA's 2020 QAP.

We recognize that opportunity can be measured in many ways and on many scales, and realize that CHFA has good reasons for considering an adjustment its approach. Our concern is that by seeking to pinpoint variations in opportunity on a highly granular level, emphasizing the differences from one neighborhood to the next, the new scoring mechanism overlooks the opportunities that are consistent across an entire municipality or an entire school district. This disadvantages municipalities such as Stonington, which have strong town-wide educational and economic indicators, and discourages their efforts to improve and revitalize less prosperous portions of their communities.

Even if, in a vacuum, there are reasons to change opportunity scoring (such as aligning CHFA's approach to opportunity mapping with DOH's), the practical impact of these changes on individual applicants should be considered. In many cases, these changes would suddenly transform the way individual sites are evaluated, rebranding previously attractive, high-opportunity areas as "low opportunity." If CHFA proceeds with the proposed scoring changes, we request that it avoid unfair and disproportionate impacts by offering previously-submitted proposals the choice to be evaluated under the 2020 scoring system. This "grandfathering" approach would account for the multiple ways opportunity can be measured, would avoid arbitrariness, and would respect the major



investments communities and applicants have made in reliance on the prior opportunity scoring mechanism.

Thank you for reviewing these suggestions to the current draft of the QAP. We are very grateful for your consideration, and are always available to speak in more depth if you have any questions.

Sincerely,



Adam Stein, Senior Vice President

WinnDevelopment Company LP





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May 26th, 2021

Terry Nash Giovannucci
Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

Re: CHFA LOW-INCOME HOUSING TAX CREDITS (LIHTC)
QUALIFIED ALLOCATION PLAN (QAP)
Incentive Points for Passive House Standards

Ms. Giovannucci,

We support the final draft of the multi-year 2022-2023 LIHTC Qualified Allocation Plan (QAP) – it looks like a great deal of thought and input was applied and included. Thank you.

The best path to energy efficiency (lower utility bills), durability, resiliency, and healthy interior environments is to continue to encourage designing Low-Income Housing to Passive House Standards.

US Department of Energy experts maintain that energy efficiency is the best way to save customers money and help low-income families. They found that energy efficiency can help a typical U.S. family lower their energy bills by up to 25%. These savings are particularly meaningful to low-income households, who often spend a disproportionately high portion of their income on energy bills.

Thank you,

Leonard Wyeth AIA CPHD

- These actions align with Connecticut's adopted benchmarks for reducing greenhouse gas emissions in SB 7: An Act Concerning Climate Change Planning & Resiliency along with the 2018 Comprehensive Energy Strategy and our ambitious State housing goals.



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May 26, 2021

Re: Public Comments on CHFA's Draft Redline QAP for 2022 and 2023

Dear Decision-makers,

My name is Sara Holmes and I am a licensed architect working and living in Chester with my husband and 8-year-old son. I grew up in Connecticut and I have a strong bond with its landscape, environment, and resources.

I strongly support the continued inclusion of, and increased points for, the Passive House building standard in the Sustainable Design Measures section of the QAP to encourage high quality buildings for the population sector who would most benefit from affordable utilities and healthy buildings.

Affordable housing needs to be:

- **Energy efficient** - essential for those needing a low utility cost burden.
- **Durable** - the longer the housing lasts, the more cost effective it is.
- **A healthy environment** – enable healthy living.

Benefits of Passive House standards for CHFA incentives in Connecticut:

- **Low Energy:** Passive House Standards assure efficiency and low utility costs because it is the lowest energy-use standard for the construction industry. It is science-based, with measurable results during and following construction.
- **Durability:** Buildings built to Passive House Standards control moisture and air – they last longer. Smaller & simpler mechanical systems are lower initial cost and easier to maintain.
- **Indoor Air Quality:** Passive House buildings manage fresh air. They filter smoke, dust & allergens. The air is always fresh throughout. They are, therefore, healthier environments. They can contribute to a lower healthcare cost burden and a higher quality of life.

I commend CHFA for the new forward-thinking Sustainable Design Measures approach. CHFA can play a major role as a catalyst fueling Connecticut's green energy economy in accordance with the Governor's goals and as such, is in a unique position to demonstrate leadership by recognizing the role buildings play. It is vital to ensure Connecticut's buildings will meet future codes and energy goals. Developers must be motivated to pursue the highest levels sustainability.

Passive House most aligns with the State's goal to provide fair, equitable, and affordable housing. Incorporating it into the QAP is in the best interest of the State and those who most benefit from what Passive House buildings offer. This level of high-performance building should be encouraged and rewarded.

Thank you for the opportunity to share my views with you today. And thank you for the work you do on behalf of Connecticut's residents.

Sincerely,

Sara Dodson Holmes AIA, LEED BD+C, Certified Passive House Designer
Connecticut Passive House founding Board Member, Secretary