

April 29, 2016  
Andrew Martin  
Michigan State Housing Development Authority  
P.O. Box 30044  
Lansing, Michigan 48909

**Re: Michigan Draft 2016-2017 Qualified Allocation Plan**

Dear Andrew Martin,

As a members of Michigan Energy Efficiency for All network – a group of organizations working towards increasing and enhancing energy efficiency in affordable multifamily housing in Michigan and part of the national Energy Efficiency for All initiative in partnership with the National Housing Trust and National Resource Defense Council – EcoWorks, The Ecology Center, and Michigan Environmental Council are glad for the opportunity to provide comment on the draft version of the 2017-18 QAP.

We support MSHDA's continued commitment to the green policy in the 2017-18 QAP. The ability to pick from multiple, trusted green standards will give developers, committed to energy efficiency, an opportunity to go beyond mandated measures and achieve bonus points.

As developers consider incorporating energy efficiency measures into their buildings we would like to see this complemented by an exclusion for energy efficiency in the cost containment measures in the 2017-18 QAP. While it is essential to put cost containment measures in place generally, we feel that the current measures do not properly account for the benefits energy efficiency features provide over the lifetime of the building not only in reducing energy use statewide but also in improving the health and quality of life of residents.

We would also like to see MSHDA consider building in incentives for benchmarking energy and water use over the lifetime of applicable tax credits. Echoing the comment of the NRDC on this topic area, we think MSHDA's pilot with New Ecology helping owners benchmark their building's energy and water use is a step in the right direction and should be expanded into the QAP itself. As the NRDC points out energy is the highest variable cost in affordable housing and we are glad for the research they have included in their comments illuminating cases from around the country showing the benefit of benchmarking support. MSHDA's support of benchmarking is a natural fit with the green policy currently found in the 2017-18 QAP. Benchmarking is an essential strategy to ensure that buildings built to green standards operate in the way they were designed.

Lastly, we encourage MSHDA to expand on the current efforts to coordinate work with utilities. We point to MSHDA's recent experience of allowing owners to use reserve funds to implement energy efficiency retrofits as part of Consumers Energy's "Energy Savers" affordable multifamily pilot project. Building on this success, we support increased collaboration and

continuity between the various partners working to enhance the quality and performance of affordable multifamily buildings.

EcoWorks, The Ecology Center and Michigan Environmental Council thank you for the opportunity to help fine-tune the 2017-18 QAP. We are thrilled to see the direction MSHDA is heading in as it pertains to green policy and the positive effect these measures will have for the quality of life and health of residents in affordable multifamily dwellings. We welcome the opportunity for further discussion on any of these points and look forward to continued partnership with you as we all work towards a better Michigan.