

DOCKETED

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SAHF BUILD comments

See attached

Additional submitted attachment is included below.

**Comments of the Stewards of Affordable Housing for the Future (SAHF) on the
CEC-CPUC Joint Agency Workshop on Building Initiative for Low-Emissions
Development (BUILD) Implementation Plan**

Docket Number 20-DECARB-01

Submitted: June 29, 2020

Submitted by: Rebecca Schaaf

Stewards of Affordable Housing for the Future (SAHF) is grateful for the opportunity to comment on the CEC-CPUC Joint Agency Workshop on Building Initiative for Low-Emissions Development (BUILD) Implementation Plan held on June 15th, 2020. SAHF is a nonprofit collaborative of thirteen exemplary multi-state nonprofit affordable housing providers who own more than 140,000 affordable rental homes, with more than 20 percent of homes located in California. Our mission is to advance the creation and preservation of healthy, sustainable affordable rental homes that foster equity, opportunity, and wellness for people of limited economic resources.

We are pleased that the BUILD program has allocated \$60 million for low-income affordable housing. This is a much-needed investment, when the costs of new construction are already very high and poses a significant barrier to filling the affordable housing gap. SAHF's comments focus on aligning the BUILD program incentives with affordable housing construction timelines and providing effective outreach.

Offer Upfront and/or Progress Payments: The two-step application process proposed, with incentives paid upon project completion, raises difficulties affordable housing developers, who face considerable funding constraints. Offering funds upfront and/or through progress payments is consistent with affordable housing financing programs and would encourage greater interest and participation from developers. Furthermore, it is my understanding that other programs (e.g., Low Income Weatherization Program, Self Generative Incentive Program, Solar On Multifamily Affordable Housing) are already considering or making progress payments available and could provide models for BUILD.

Third-Party Outreach Provider with In-Depth Affordable Housing

Experience: Effective technical assistance and outreach will be crucial the BUILD program's success. Given the nature of the program and nuances of the affordable housing industry, we believe the CEC should hire a third-party outreach provider with in-depth knowledge of the affordable housing industry. Affordable housing development is complex, with several financing agencies with distinct mandates. The outreach provider should have knowledge of these varying mandates, experience in helping affordable housing providers navigate energy efficiency and renewable programs, and established networks reach a wide range of nonprofit affordable housing providers. To streamline the program and its varying components, CEC should model the BUILD program outreach and technical assistance after the Multifamily Low Income Weatherization Program.

SAHF is grateful for the chance to comment on the BUILD program's implementation plan and appreciates the Commission's dedication to promoting decarbonization in a manner that benefits California's low-income communities.

/s/

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