

To: Program Administrator comments@illinoisSFA.com
From: Joint Pilot Commenters
Date: July 24, 2024
Re: Feedback on the Home Repairs and Upgrades Initiative

Thank you for the hard work and thought that has gone into this pilot. We strongly support the Administration's proposed changes regarding eliminating written communications regarding third party funding, increasing the cost caps for roofing, electrical work, and permit fees, and adding an administrative fee (though \$100 seems negligible), but believe these changes will not address what we see as the primary obstacles to meeting the pilot goals.

Based on conversations with Approved Vendors and designees, we understand that the two insurmountable obstacles to participation in this pilot are: 1) an inability or unwillingness to front the capital for roof repair and/or electrical upgrades and 2) the inherent risk in uncovering additional damage after roof repair work has begun, resulting in costs exceeding the caps.

We understand that a lack of access to capital is already preventing several AVs that would like to participate in the ILSFA residential subprogram from doing so. Expecting additional AVs to join *the pilot* when the upfront cost barrier has not been addressed seems unreasonable. Perhaps the Administrator can work with the IL Climate Bank to determine if and when financial products and grant funds will be available, and adjust the reopening of this pilot accordingly.

Also, while increasing the cost caps may be enough to attract AVs, even with a cost cap of \$14,000, the risk of uncovered costs still seems quite high. We believe there is no circumstance under which an Approved Vendor should shoulder the cost of a roof repair. Perhaps funds could be set aside to cover unanticipated repairs discovered once repair work has been initiated. The AVs should be held to a high standard of roof inspection before having access to any of these funds.

Finally, we hold serious concerns about the use of public funds to remove trees. Although tree removal can in certain circumstances be beneficial, we believe the Administrator should award such funds with caution, requiring a demonstration via photo and/or video that the tree slated for removal is dead, diseased, decaying, or deemed hazardous to the property. In addition, an applicant for tree removal funds should demonstrate compliance with tree-removal regulations issued by the authority having jurisdiction.

Respectfully submitted,

A Just Harvest

Sustain Rockford

Greenlink Solar Solutions, Inc.

Citizens Utility Board

Central Road Energy LLC

Vote Solar

Central Illinois Healthy Community Alliance

Illinois Environmental Council