

AHFA 2021 Draft HOME Action Plan, Low-Income Housing Credit Qualified Allocation Plan,
and National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period July 2, 2020 – August 20, 2020

All comments regarding the Draft Plans must be submitted using this form. General Comments may be submitted at the bottom of the form. **Comments which include cut-and paste text (or redlined/re-worded sections) of the proposed Plans will be rejected.** AHFA will not respond (or seek to interpret) to suggested change in language without a complete explanation of the suggested language change. Please provide full explanatory and careful comments regarding your proposed changes, keeping in mind that your proposed changes might have an unintended consequence for a different project or location in the state. All forms should be submitted to ahfa.mf.gap@ahfa.com as an attachment to the email. Other documentation, e.g., product information or photos, may also be submitted. All comments will be posted at www.ahfa.com for review.

8/20/2020

Name: Graham Green Organization: Smart Home America Email: graham@smarthomeamerica.org Phone: 855-742-7233

Plan Section	Section Reference	Page #	Specific Comments
HOME	Point Scoring	A-3	<p>We recommend additional scoring criteria for meeting the FORTIFIED Home™ or FORTIFIED Commercial™ resilient construction standards.</p> <p>The state of Alabama is home to the largest concentration of FORTIFIED homes in the nation. Developers can qualify for insurance premium reductions for meeting either standard according to Alabama Code sections 27-31D-2 and 27-31D-1 (Act 2009-500, p. 924, §1; Act 2015-313, p. 947, §1; Act 2018-249, §1.).</p> <p>There are FORTIFIED standards available for both inland and coastal environments. FORTIFIED can be used during new construction and retrofit projects. It is proven to reduce damage and losses from hurricanes, up to low-level EF2 storms, hail, and thunderstorms at relatively low cost. FORTIFIED was developed by the Insurance Institute for Business and Home Safety.</p> <p>The "Natural Hazard Mitigation Saves: 2019 Report" conducted by the National Institute of Building Sciences (NIBS) found that using current building codes returns \$11 for every \$1 invested (an 11:1 ROI). The same report also shows that using FORTIFIED's beyond-code construction methods can save an additional \$4 for every \$1 spent, or more, based on the building's location. FEMA, HUD, and ICC support the NIBS report. FORTIFIED is also recognized by FEMA, HUD, the US Small Business Administration (SBA), and the USDA.</p> <p>FORTIFIED is used by state and local governments to increase the resilience of homes, businesses, and communities. The</p>

AHFA 2021 Draft HOME Action Plan, Low-Income Housing Credit Qualified Allocation Plan,
and National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period July 2, 2020 – August 20, 2020

			<p>State of Alabama has invested in FORTIFIED construction through its Strengthen Alabama Homes grant program. The program has retrofitted over 2,200 properties across the state to meet the FORTIFIED Roof™ standard. Additionally, nearly 75% of jurisdictions in the two coastal counties of Alabama enforce beyond-code construction requirements that meet or almost meet, FORTIFIED Home standards.</p> <p>In short, FORTIFIED is proven, affordable, and can help keep residents safer, reduce long-term costs, and reduce the risk of loss to properties.</p>
HOME	Point Scoring	A-3	<p>We recommend using FEMA P-361 Guidance for Community and Residential Safe Rooms in place of ICC 500. To quote the FEMA P-361 document - "Safe rooms should be designed and constructed in accordance with the provisions of ICC 500. In addition, FEMA provides Recommended Criteria that are more conservative than code and standard minimum requirements. Based on field investigation and research, FEMA believes these Recommended Criteria are necessary to provide near-absolute protection during extreme-wind events."</p>
HOME	Section	B-8	<p>c. Floodplains. We recommend no buildings, regardless of Housing Credit, to be built within a 100-year floodplain. Additionally, we recommend that buildings located within a 500-year floodplain have points deducted from its application. However, points could be earned if a building is situated in the 500-year floodplain and exceeds minimum freeboard requirements for the location.</p>
HOME	II	C-2	<p>We recommend all structures built in the 500-year floodplain require a minimum of two feet (2 feet) of freeboard above the base flood elevation or meet the floodplain regulations of the local jurisdiction, whichever is more stringent.</p>
General Comment	Section	Draft 2021 AHFA Design Quality Standards and Construction Manual	<p>We recommend including FORTIFIED Home™ and FORTIFIED Commercial™ resilient construction standards as required criteria for the construction of affordable housing in Alabama.</p> <p>The state of Alabama is home to the largest concentration of FORTIFIED homes in the nation. Developers can qualify for insurance premium reductions for meeting either standard according to Alabama Code sections 27-31D-2 and 27-31D-1 (Act 2009-500, p. 924, §1; Act 2015-313, p. 947, §1; Act 2018-249, §1.).</p> <p>There are FORTIFIED standards available for both inland and coastal environments. FORTIFIED can be used during new construction and retrofit projects. It is proven to reduce damage and losses from hurricanes, up to low-level EF2</p>

OME Action Plan, Low-Income Housing Credit Qualified Allocation Plan,
and National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period July 2, 2020 – August 20, 2020

[illegible]