

AHFA 2022 Draft Low-Income Housing Credit Qualified Allocation Plan, HOME Action Plan,
and National Housing Trust Fund Allocation Plan
Public Comment Form
Commenting Period July 28, 2021 – August 27, 2021

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.

8/26/2021

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	I	3	In addition to the identified Housing Priorities in Section I.B., AFHA should include an additional priority stating: "Projects that promote resilience to natural disasters and severe weather by being built to withstand all knowable natural hazard risks and last for a generation." Alabama faces a variety of natural hazards, including hurricanes, tornados, and floods. Residential and community resilience are basic needs – the absence of which is most keenly felt by those who lack the resources to invest in it themselves. According to sociological research, disabled, elderly, low income, and other vulnerable people are less likely to prepare for disasters, evacuate safely, avoid physical or psychological trauma, or recover quickly and fully. Low-income residents and other residents of affordable housing account for a meaningful percentage of the population in many coastal communities and other areas that face natural hazards, often living in the most vulnerable types of housing. This reality places an even higher priority on resilience to prevent avoidable damage to the places these populations live.
Housing Credit	II	7	In addition to the Application Criteria identified in pages 3-7, AFHA should include an additional criteria stating: "Provide evidence acceptable to AHFA that the proposed project is designed and will be constructed to withstand all knowable natural hazard risks and last for a generation." Alabama faces a variety of natural hazards, including hurricanes, tornados, hail, and floods. Residential and community resilience are basic needs – the absence of which is most keenly felt by those who lack the resources to invest in it themselves. According to sociological research, disabled,

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HTF	II	13	In addition to the Application Threshold Requirements identified on pages 11-17, AHFA should include an additional threshold requirement stating: "All projects must include information detailing what measures in the design and construction of the building(s) will assist the project in withstanding all knowable natural hazard risks."
Housing Credit	Point Scoring	A-3	We recommend additional scoring criteria for meeting the FORTIFIED Home™ or FORTIFIED Commercial™ resilient construction standards. 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.). 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 tornadoes, hail, and thunderstorms at relatively low cost. FORTIFIED was developed by the Insurance Institute for Business and Home Safety (IBHS). 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.

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Housing Credit	DQS	C-1	Page C-1, II. Requirements for All Approved Projects. We recommend the Draft 2022 AHFA Design Quality Standards and Construction Manual (Addendum C, HOME Action Plan) require that all new construction projects in ALL ZONES be built to FORTIFIED Home™ or FORTIFIED Commercial™ resilient construction standards for single-family and multifamily projects, respectively. 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.). 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 tornadoes, hail, and thunderstorms at relatively low cost. FORTIFIED was developed by the Insurance Institute for Business and Home Safety (IBHS). 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.

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