



126 West Adams St., Suite 601
Jacksonville, FL 32202
T 904-598-2669
F 904-598-26710
www.flacdc.org

15 November 2019

Tracy Banner
Florida Housing Finance Corporation
227 N. Bronough St., Ste. 5000
Tallahassee, FL 32301

Re: Comments regarding FHFC strategic planning process

The Florida Alliance of Community Development Corporations, Inc. (FLACDC) is pleased to provide comment from its members on the questions posed by Mr. Dubuque in his email requesting stakeholder input for the strategic planning process. Please see our members' suggestions below.

1. What are the essential issues affecting the provision of affordable housing in Florida today and what will they be in the coming years?
 - a) Capital access by nonprofits to acquire properties before private sector developers.
 - b) Subsidies from government to non-profits and others that will allow the development of significant affordable rental and homeownership projects that can cash flow for the developer and operator.
 - c) Permanent affordability -- We have already seen that the need for affordable housing across our state is only growing, exceeding the 15- and even 30-year affordability periods that are currently expiring or soon to expire for many properties funded by FHFC. As a result, FHFC must prioritize strategies that create permanent affordability that meets the ongoing needs that Florida is projected to have.
 - d) Stagnant wages that do not keep pace with housing costs.
 - e) Also a trend toward transit oriented development sites going luxury and general gentrification.
 - f) Not enough local efforts like inclusionary zoning that mandate affordable homes; land use issues and density.

2. What should Florida Housing and our many partners do to address these issues?
 - a) FHFC and its partners should create programs that will appropriately re-capitalize affordable developments while keeping them affordable long term.
 - b) Make it easier to acquire capital for affordable housing development, particularly for smaller scale developments. Local governments don't have the resources to provide the needed funding to adequately assist with these projects.
 - c) More advocacy to restore full Sadowski funding. Create state incentives for municipalities and counties to step up local efforts.
 - d) Support local non-profits in the trenches of restoring blighted neighborhoods (including housing rehabs).
 - e) Give LIHTC scoring points to for-profit developers who partner with non-profits in meaningful ways

3. How can we improve the delivery and increase the production of affordable housing units in Florida?
 - a) Provide more resources for nonprofits that want to provide affordable housing to their communities. Provide funding for smaller scale developments.
 - b) Decrease the minimum project size, which would open many more well situated urban infill development sites. Increase the nonprofit set-aside for 9% deals to help level the playing field. Nonprofit housing development capacity building efforts such as a meaningful set-aside could result in a stronger delivery system. Many states have proven this to be the case.
 - c) Ask governments to cooperate with developers, expedite approvals, reduce costs such as impact fees and increase density.
 - d) Meet with large corporations that employ a large number of people and have them donate to a pool of available monies that can be utilized in each county where their businesses are located to help build affordable housing.
 - e) Make the Community Contributions Tax Credit program a more fair distribution system.

4. How should we utilize our limited resources in the near and long term to best address Florida's most crucial affordable housing needs?
 - a) Think bigger and more creatively. FHFC is way too bureaucratic in thought and action.
 - b) Ensure that resources are given in exchange for long-term if not permanent affordability.
 - c) Better leveraging. Think outside the box... if you feel you have limited resources then that is what you will have. Develop strategies that will increase resources and create new ideas that will drive less expensive construction of affordable housing.
 - d) Work with the Huge companies like Fannie Mae and Freddie Mac to help to come up with those solutions. We all become "comfortable" thinking that we have "limited resources" when in reality FHFC is a huge influencer in FL not only with the big banks but with the larger investors, stop thinking small, think big.

The above suggestions were submitted by Alliance members from HOMES, Inc., Ft. Lauderdale; Neighborhood Renaissance, Palm Beach County; Tama Bay CDC; Miami Homes for All, Miami; Opa-Locka CDC; and Affordable Homeownership Foundation, Ft. Myers. They represent large, mature nonprofits as well as smaller, less experienced organizations. We would be happy to make their specific remarks available to you if you are interested.

page 3

Tracy Banner

Re: Comments regarding FHFC strategic planning process

We are aware that one of the biggest issues impacting affordable housing development by nonprofits is that relatively few of them are able to access funds from FHFC directly due to concerns about their capacity to successfully execute the projects.

Several years ago, FLACDC developed a certification program for nonprofit developers that looked at their financial, operational and programmatic capacities. We believe that this program could be modified to help alleviate these concerns. We met with Nancy Muller and Bill Aldinger to discuss this program earlier this year and would be happy to continue the conversation,

FLACDC thanks you for the opportunity to submit our comments and those of our members regarding the new strategic plan. We look forward to following the process and hope you find our comments useful.

Sincerely,

A handwritten signature in blue ink that reads "Terry Chelikowsky". The signature is written in a cursive, slightly slanted style.

Terry Chelikowsky
Executive Director

The Florida Alliance of Community Development Corporations, Inc. (FLACDC) was incorporated in 2004 to build the capacity of community-based development organizations (CBDOs) and represent them in Tallahassee and nationally.

Our mission is to lead Florida's community development field and its partners in shaping strategies that advance community prosperity. We envision a Sunshine State in which every community offers its residents opportunities to create brighter, more prosperous futures.