November 17, 2017

Members of the Affordable Housing Workgroup  
c/o Florida Housing Finance Corporation

Subject: Comments for Workgroup

Dear Workgroup Members:

On behalf of the City of Orlando, I would like to thank each of you for your participation on the Affordable Housing Workgroup. Your time and commitment to addressing the complex issues surrounding affordable housing are greatly appreciated. We strongly support the desire for all State Housing Trust Funds to be appropriated for Florida’s housing programs, and we urge you to recommend that resources be used to aggressively produce more affordable housing for both homeowners and renters.

We have two recommendations that we believe the Workgroup could immediately consider for potential statutory or regulatory consideration.

1. Modify SHIP program to increase flexibility for funding rental development and to allow multi-year accumulation of funds to support larger projects.

   - Currently SHIP requires 65% of annual allocation to be spent on homeownership, and 30% of the annual allocation dedicated to very-low income households (50% AMI and below). A person at 50% AMI cannot afford to own a home. More rental units are needed to serve the very-low income households.

   - Allow local jurisdictions to determine percentage or threshold of funds to spend on rental and homeownership activities. Local jurisdictions can identify in their Local Housing Assistance Plan (LHAP) the percentage of their SHIP allocation that will be expended on rental and homeownership activities. The LHAP will continue to be reviewed and approved by Florida Housing Finance Corporation.

   - Allow local communities to aggregate percentage of activity expenditure over a 3 year period to accumulate funds to support large projects. For instance, over a 3-year period, no less than 20% of the funds would be expended for households with Special Needs; or over a 3-year period, no less than 30% of the funds would be expended for households at or below 30% AMI.
• Establish a set annual funding allocation for a three year LHAP period to provide local jurisdictions the ability to do some long range planning.

2. Continue allowing local jurisdictions the option of designating a Local Government Areas of Opportunity Preference in Low Income Housing Tax Credit funding rounds. This is one of the most significant tools a local government can use to redevelop and stabilize neighborhoods. The Preference can allow for long range strategies in developing both affordable housing and combining educational, health, transportation and employment strategies.

Thank you again for your work and the opportunity to provide comments.

Regards,

Byron W. Brooks, AICP
Chief Administrative Officer

BWB/jc

cc: Mayor Buddy Dyer
    Commissioner Jim Gray, District 1
    Commissioner Tony Ortiz, District 2
    Commissioner Robert Stuart, District 3
    Commissioner Patty Sheehan, District 4
    Commissioner Regina Hill, District 5
    Commissioner Samuel Ings, District 6
    Frank Billingsley, Mayor’s Chief of Staff
    Christopher McCullion, Chief Financial Officer
    Deborah Girard, Deputy Chief Administrative Officer
    Kevin Edmonds, Deputy Chief Administrative Officer
    Oren Henry, Housing Director