

Marisa, Bill

Please find attached my comments in response to the Live Local Program workshop several weeks ago. The workshop was excellent and having thought a lot about the program, its implementation and funding availability, I wanted to share these thoughts that I think may help in the implementation of the program.

Thanks for all you do.

Excited about all the great programs and incentives in the Live Local Act.

Clearly more work for all of you.... but your team will do a fabulous job.

Jeff

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Live Local Program Comments

1. Live Local Tax Credit Contribution Recognition

I think it would be helpful to create some type of contributor recognition program for companies that want to reserve their corporate tax payments for the Live Local Community Contribution Tax credit program so that they feel incentivized and appreciated. Perhaps create something like a "Live Local Housing Hero" or "Florida Housing Hero" program where companies get recognition through a certificate and listing on the FHFC Website with annual awards of some type.

2. Transformational Development Project Eligibility and Funding

a. The eligibility requirements for including "substantial" civic, educational or health care uses outlined in the law and the workshop for the large-scale projects of significant regional impact are clear and appropriate. Perhaps the applicant needs to enumerate or define in detail the uses outlined to provide some quantifiable measure of "substantial uses". Also, the substantial ought to apply to the number of units being proposed in the development so that it meets the standard of "large scale projects of significant impact".

b. With \$25 million being available now and another \$25 million in 2024, there was a statement at the workshop that Florida Housing was considering funding 2 projects in the initial RFA of \$12.5 million each. If SAIL funding can be no more than 25% of the total project cost, there is a possibility that a project could have a total development cost of only \$50 million which may not meet the description of "significant regional impact" or transformational in terms of the number of units developed. I believe the goal of the Live Local program is to develop more housing units than under the current traditional RFA's funding programs.

If the program was intended to incentivize truly meaningful developments of significant regional impact, then it would be expected that you may get applications for projects with hundreds of units, mixed residential and commercial uses and project costs in excess of \$200 million dollars. If that is the case, then they may need more than the \$12.5 million to ensure the financial viability of the projects. However, if you are contemplating funding several projects at \$12.5 million each, you may not be providing enough funding to make one really significant project viable.

Perhaps there is a way to ensure that if a significant project needs more than \$12.5 million, the corporation can provide a commitment for multiple years of funding to ensure it gets developed while allowing several projects the opportunity to be funded. Without a firm commitment for soft gap financing, projects that are truly significant in terms of numbers of units may not be able to secure the private debt and equity for the project, undermining the intent of the entire concept. We recognize it may be difficult for the corporation to authorize a multiyear forward allocation of funding,

therefore it probably makes sense to fund one or two major projects with the \$50 million from this and next year.

Also, in terms of scoring or prioritizing projects, it may make sense to prioritize projects that have a lower SAIL percentage of total development costs to truly maximize the resource. Again

c. It would also help to leverage SAIL funding to prioritize deals for funding where the public or private sector donates land, money, or both.

