

Affordable Housing PROJECT

A project of



December 7, 2007

Stephen P. Auger, Executive Director
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

Re: Proposed amendments to FAC Chapter 67-48; Universal Application Instructions

Dear Mr. Auger:

Thank you for the chance to offer comments to the proposed amendments to FAC Chapter 67-48 and accompanying draft Universal Application Instructions. The Miami Coalition for the Homeless regrets that we are unable to attend the workshop in Orlando, but we welcome the opportunity to submit our remarks in writing.

The Miami Coalition for the Homeless, Inc. (MCH) was founded in 1984 to promote community efforts to prevent and end homelessness in South Florida. More recently, the Coalition established its Affordable Housing Project to advocate for decent permanent lodging for extremely-low income people in Miami-Dade County.

Because of the acute shortage of safe, respectable, affordable housing for extremely-low income families and individuals, new construction and rehabilitation of existing housing is imperative if we are to prevent their falling into homelessness. MCH is therefore grateful for the addition of Section (3) of FAC 67-48.009, providing the carrot of larger loans for developments that set aside either 5 or 10 percent of planned units for ELI households, and for the retention in the draft application instructions of the similar minimum ELI Set-Aside threshold requirements, Part III.E.1.b.(2)(a).

Unfortunately, this limited set-aside does not go far toward meeting the tremendous need for housing among extremely-low income Florida households. The Miami Coalition for the Homeless strongly believes that public housing moneys should be distributed in such a way as to begin to fill the greatest void first – housing for those now living in the most intolerable conditions. Yet Florida is clearly failing these residents when compared with other states: For example, HUD data show that Florida ranks 49th among the states in the proportion of HOME funding used to assist ELI renters. We therefore urge that consideration be given to allocating funding by household income in proportion to the number of such households that are

Rule Comments

Page 2

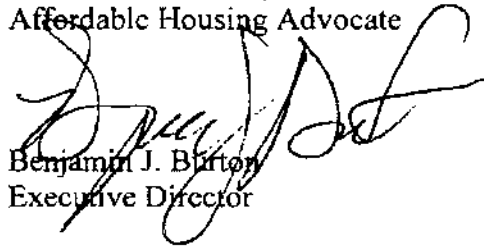
cost burdened and/or living in substandard housing. This would result in a much greater share of funding being allocated to ELI households, where the greatest need lies.

The Coalition recognizes that one of the barriers to increasing the supply of rental housing that is within the means of extremely-low income families is the difficulty of maintaining affordability over time. Under current limitations in funding streams, we believe that a sensible solution to this problem is to allot a portion of the capital to subsidize rentals for ELI households. For example, federal HOME funds may be used for this purpose, while local jurisdictions could help monitor the use of the funds. The Miami Coalition for the Homeless therefore urges the Corporation to set-aside moneys for project-based rental assistance to enable private entities to build and maintain affordable housing for extremely-low income Florida households.

Sincerely,



Terry A. Coble, Esq.
Affordable Housing Advocate



Benjamin J. Burton
Executive Director