

April 18th, 2016

Florida Housing Finance Corporation
227 N. Bronough Street
Tallahassee, Florida

RE: Comments for Rule Development Workshop

Dear Florida Housing Finance Corporation:

Our comments reference the categorical exclusion of senior housing in Monroe County, Florida, which we are requesting be removed for the following reasons.

Page 12, Section 5. General Development Information of Request For Application (RFA) 2015-106 Housing Credit Financing for Affordable Housing Development Located in Medium and Small Counties, issued by the Florida Housing Finance Corporation states the following ***“To be eligible to be considered for any funding, if the proposed Development is located in a Small County the Applicant must select the Family Demographic at question 2.(a) of Exhibit A.”***

This rule has a discriminatory impact on the senior population of Monroe County. According to the most recent demographic information published by the United States Census Bureau, Monroe County has seen a 6% overall population increase from April 2010 to July 2014. However, within that increase, Persons over 65 years of age represent the fastest growing population in Monroe County. In the same time period the senior population increased 26.5% (12,498 in April 2010 to 15,813 in July 2014).

Further, while the population of Monroe County has increased 6% from April of 2010 to July of 2014, available housing units have not kept pace. During the same period available housing has increased by less than 1%.

Not enough housing is being produced to absorb the rapid growth in the senior population, which in turn is putting added pressure on affordable housing options. Since non-age restricted housing is available to the general population, including seniors, the absence of age-restricted housing generates what might be considered an un-intended result of the above policy, by pushing seniors into what would otherwise be workforce housing. As such, this is exacerbating the already over-burdened affordable housing market.

According to the Monroe County Workforce Housing Stakeholder Assessment Report completed in April of 2015 by Mr. Robert Jones, Director, FCRC Consensus Center, Florida State University, three particular issues from the Executive Summary of the report regarding affordable housing in Monroe County should be noted:

- 1) "Cost-burdened" households pay more than 30% of income for rent or mortgage costs. In 2013, 51% (or 16,849) of Monroe County households pay more than 30% of income for housing while statewide that figure is 43%. More than half of Monroe County renters are cost burdened (8,350 of 14,002) . . ."
- 2) "The findings of all of several recent reports on Monroe County's current housing situation confirm that there is a significant and growing shortage of affordable workforce housing, both rental and ownership. ***In addition there exists a policy gap in that affordable housing for the working and middle classes is largely left to individual municipalities and counties to deal with.***"
- 3) "In November 2014 the United Way of Florida released its report, ALICE (Asset Limited, Income Constrained, Employed: Study of Financial Hardship. ***The Report evaluates community conditions for each of Florida's counties via a weighted "Economic Viability Dashboard" in three core areas using a scale of 1 (worst) to 100 (best). Monroe County's results area as follows:***"

<u>Core Areas</u>	<u>Rating</u>	<u>Grade</u>
Housing Affordability (40%)	14 of 100	Poor

Considering the senior population growth and the overall lack of affordable housing in Monroe County , categorically excluding affordable housing for the existing and growing senior population of Monroe County will continue to worsen a situation that has already reached crisis proportions. We request that in future Requests for Applications the Florida Housing Finance Corporation include senior housing as an acceptable development option for Monroe County.