



**BOARD OF DIRECTORS**

**Suzanne Cabrera, Chair**  
*Housing Leadership Council of Palm Beach County, Inc.*

**Robert Von, Vice Chair**  
*Meridian Appraisal Group, Inc.*

**Ben Johnson, Treasurer**  
*Seltzer Management Group, Inc.*

**Leroy Moore, Secretary**  
*Tampa Housing Authority*

**Ed Busansky, At Large**  
*First Housing Development Corporation*

**Mark Hendrickson, At Large**  
*The Hendrickson Company*

**Jeff Kiss, At Large**  
*Kiss & Company, Inc.*

**Melvin Philpot, At Large**  
*Duke Energy*

**George Romagnoli, At Large**  
*Tampa Bay CDC*

**Barbara Beck**  
*Habitat for Humanity of Florida*

**Stephen Bender**  
*University of Florida*

**Charles Elsesser**  
*Community Justice Project*

**Armando Fana**  
*City of West Palm Beach*

**Bradford Goar**  
*Florida Power and Light*

**David Hall**  
*Florida Realtors*

**Cheryl Howell**  
*Hillsborough County*

**Jack Humburg**  
*Boley Centers, Inc.*

**Nancy Merolla**  
*Synovus*

**Aileen Pruitt**  
*PNC Bank*

**Anne Ray**  
*Shimberg Center for Housing Studies*

**Mike Rogers**  
*Southern Advocacy Group*

**Manny Sarria**  
*Miami-Dade County Homeless Trust*

**ADVISORY COUNCIL**

**Bob Ansley**  
*Orlando Neighborhood Improvement Corporation*

**Stephanie Berman**  
*Carfour Supportive Housing*

**David Christian**  
*Regions Bank*

**Marilyn Drayton**  
*Wells Fargo*

**Helen Hough Feinberg**  
*RBC Capital Markets*

**Debra Koehler**  
*Sage Partners*

**Tim O'Malley**  
*AmeriNat*

**Christine Ruiz**  
*Bank of America*

**PRESIDENT/CEO**  
**Jaimie Ross**

DATE: May 31, 2020

TO: Trey Price, Executive Director, Florida Housing Finance Corporation  
Marisa Button, Director of Multifamily Programs

FROM: Jaimie Ross, CEO, Florida Housing Coalition

RE: Comments for RFAs

Using precious housing subsidies to create housing that remains affordable is the utmost important public policy. According to Shimberg Center data, the FHFC will have lost affordability restrictions on over 28,000 affordable units in its portfolio by 2030 due to expiring land use restrictions. FHFC can assure that affordability is protected by using its scoring process to drive permanent affordability in new construction and rehabilitation. To that end, the Florida Housing Coalition strongly recommends the prioritization of permanent affordability. This can be accomplished in the following ways:

- Offer a point boost (2 or 3 points) for choosing perpetuity as the affordability period. These points could be obtained by choosing from several options to accomplish permanent affordability including land ownership by a community land trust
- Treat an executed 99-year ground lease with a community land trust the same as a deed for the proposed point boost for site control
- Allow for the value of land to count toward the Local Government Contribution (typically 5 Points) and toward the required contribution for Local Area of Opportunity, only if the applicant agrees to perpetuity as its affordability period. This could support projects in small and medium counties where local governments may have land but lack monetary resources.

A key component for protecting the FHFC portfolio is resolve in maintaining long-term affordability periods and promoting permanent affordability. The community land trust, where ownership of the land is separated from ownership of the building, is the most effective means of accomplishing permanent affordability through requirements in the ground lease that the housing be sold or leased to income-eligible households at an affordable price.

To your credit, in 2019, Florida Housing Finance Corporation included a preference for permanent affordability and partnerships with community land trusts in the Community Development Block Grant Disaster Relief (CDBG-DR) requests for applications (RFA) in response to Hurricane Irma. These RFAs will produce hundreds of permanently affordable rental housing in communities throughout the state. Several of the developments funded through these RFAs will happen through partnerships with community land trusts. **The substantial oversubscription for these RFAs proves that developers will provide permanent affordability when it is required.**

Please seize this opportunity to expand and permanently secure affordable housing in Florida for generations to come. The units constructed or rehabilitated through FHFC should remain permanently within Florida Housing's portfolio, never to be lost through expiring affordability periods.