FLORIDA ALLIANCE FOR COMMUNITY SOLUTIONS
Creating Better Communities

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9 April 2019

Date: 17 November 2026
To: Special Programs
From: Terry Chelikowsky, Executive Director
Re: Rule Chapter 67-38, F.A.C., Predevelopment Loan Program (PLP)

Thank you for the opportunity to provide comments on proposed changes to the Predevelopment Loan Program (PLP) administered by FHFC.

As the representative of dozens of Florida nonprofits working in the affordable housing arena, we believe that FHFC should take active steps to promote and encourage nonprofit engagement in the development and ownership of affordable housing in Florida. The ability to access the PLP, with its combination of pre-development and acquisition funding, can be a very useful tool for nonprofit developers. We would like to submit the following comments as part of the current rule-making process.

Rule Chapter 67-38, F.A.C., Predevelopment Loan Program
67-38.007 Terms of PLP Loan: This is a good addition if the nonprofit developer already has an acquisition loan from another lender. It makes the predevelopment loan accessible with a letter of credit.

67-38.008 Eligible Uses for the Loan: We propose that this section be amended to include the option of a pre-development **forgivable** loan of up to $75,000 for the project related activities listed under (3) (a) through (v). The loan would be forgivable (a grant) if the project **does not** move forward. If the project is successfully funded, the loan would be repaid at 1% interest.

We realize this is a new twist to an existing program, but our membership believes this one change would significantly enhance the program and make it more user friendly to nonprofit developers.

Again, we appreciate the opportunity to comment and hope you will seriously consider our proposal.