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June 17, 2019

Re: Florida Housing Coalition Comments on 6-12-19 draft RFA 2019-101

Community Development Block Grant- Disaster Recovery Financing for Workforce Housing in Monroe County

Ms. Marisa Button,  
Director of Multifamily Allocations  
Florida Housing Finance Corporation

Dear Ms. Button:

Thank you for the opportunity to provide comments in regard to draft RFA 2019-101. The Florida Housing Coalition is home to the Florida Community Land Trust Institute, helping to form CLTs throughout Florida and to engage the public sector in support of CLTs. We commend Florida Housing for its vision in requiring the community land trust model and permanent affordability as a core component of the RFA.

1. p. 8 ii The Articles of Incorporation must demonstrate that one of the purposes of the Land Trust entity is to "preserve affordable housing."

Comment: While the preservation of affordable housing typically refers to preserving affordability when affordability requirements expire in the life span of a housing development, in the case of Community Land Trusts, the designation is "the development of housing that will remain affordable in perpetuity."

2. Page 11. (5) Community Land Trust Experience

Comments:

First bullet. This section proposes that the CLT must have been incorporated prior to the date of landfall of Hurricane Irma, September 10, 2017. This requirement would exclude CLT's formed in the aftermath of Hurricane Irma with the specific purpose of rebuilding workforce housing in Monroe County.

We understand the intention to avoid hastily formed CLT's in name only that are constituted more to qualify for this RFA than to commit to sustainable oversight and operational stability in perpetuity. We believe a suitable formation date would be the date HUD approved the Hurricane Irma Action Plan on June 28, 2018. (see page 7 <http://www.floridajobs.org/docs/default-source/office-of-disaster-recovery/hurricane-irma/actionplanamend1substantial.pdf?sfvrsn=2>)

Alternatively, it may be suitable to require that the CLT was formed prior to the November 2, 2018 workshop for this RFA in which the notion of permanent affordability was proposed.

Second bullet. It should be noted that the value a CLT brings to this workforce housing development strategy is in the core mission of the CLT as steward responsible for ensuring that long term affordability occurs and a permanent supply of affordable housing is part of the community.

Typically, CLT's are not in and of themselves experienced multifamily developers as many initially develop single family housing using the classic ground lease model where low income home buyers purchase only the improvement, thus removing the cost of land from their purchase price and the ground lease provides for the long term affordability provisions. Rather, just as other nonprofits do successfully, CLT's may joint venture with an experienced developer and property management company if they seek to develop multifamily housing.

3. Page 19. Do you mean Hurricane Irma in the third sentence regarding landfall? We do agree that the land acquisition portion of the RFA should not be available for properties owned prior to September 10, 2017.

4. Page 42. Table does not include the required property appraisal for applicants requesting land acquisition funding from CDBG-DR.

Thank you for your consideration. Should you have any questions, I can be reached at [cook@flhousing.org](mailto:cook@flhousing.org)

Gladys Cook

A handwritten signature in black ink that reads "Gladys Cook". The signature is written in a cursive, flowing style.

Disaster Housing Recovery Director