



February 11, 2022

Ms. Marisa Button
Florida Housing Finance Corporation
Multifamily Development Programs
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

Re: February 17, 2022 Rule Development Workshop – Rule Chapter 67-60 FAC and 67-21 FAC

Dear Ms. Button:

On behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA), we are writing to respectfully request the integration of a pet-friendly preference for housing developments financed by the Florida Housing Finance Corporation (FHFC) utilizing the federal Low Income Housing Tax Credit program (LIHTC).

Founded in 1866, the ASPCA was the first humane society to be established in North America and is today one of the largest in the world. The ASPCA believes that pets and people belong together; that financial circumstances alone is not a reliable indicator of the capacity to love and care for a companion animal; and that strong bonds between people and pets make for stronger communities.

Unfortunately, a shortage of pet-friendly housing can conspire to force even the most devoted pet owner to relinquish a beloved pet to a local shelter. Sadly, the lack housing options available in the market that are both pet inclusive and cost appropriate means that lower income households are forced to make this difficult decision far more frequently. In fact, a national study conducted by the ASPCA revealed that those who rent are more likely to need to rehome their pets for housing issues than for any other reason.ⁱ Further, families that relinquish a pet often cite financial eviction from their current housing and a lack of suitable pet-friendly alternatives in the rental market.

This reality is particularly detrimental because, at a time of extraordinary stress and uncertainty, the emotional and mental health benefits that pets provide for persons experiencing the trauma of eviction, displacement, or homelessness are critical. Consistent with the goals of affordable housing, enabling families to have pets in housing can significantly contribute to their overall wellbeing. According to the Centers for Disease Control and Prevention, pets have positive impacts at nearly every stage of life. Pets influence social, emotional, and cognitive development in children, promote an active lifestyle, and have been able to detect oncoming epileptic seizures or the presence of certain cancers.ⁱⁱ Research shows that cats provide emotional support, improve moods, and contribute to the overall morale of their owners. Cats are also credited with promoting socialization among the elderly and physically or mentally disabled people. Furthermore, people with pets tend to have lower blood pressure, cholesterol and triglyceride levels. These benefits are consistent with goals to holistically address the social, economic, and health outcomes. As such, pet-friendly housing promotes happier and healthier families, better futures for the family pet, and a reduced financial burden to shelters and the public.



Given the many benefits that accrue to humans from pets, the ASPCA believes that it is important to ensure those with lesser financial means who will be served by the LIHTC investments have access to pet-friendly housing. This goal could be achieved through the application in two ways: 1) for non-competitive projects, the requirement could be imposed through the rulemaking process; and 2) for competitive projects, a pet-friendly preference could be included by adding a scored component to the LIHTC application.

Integrating these preferences would result in much-needed pet-friendly housing being added to the market and would build on the strong commitment of the federal government in supporting pet-friendly housing opportunities. The federal Department of Housing and Urban Development (HUD) has required all its public housing and all HUD-insured and/or –financed housing for senior or disabled households to be pet-friendly since 2000 and 2008 respectively.ⁱⁱⁱ

FHFC has at its discretion the ability to expand much-needed pet-friendly housing opportunities for lower income Floridians, strengthen communities and families, and improve public health outcomes for impacted households. We thank you for your leadership in considering this proposal so that fewer households are faced with the difficult decision of giving up their pet and keeping a roof over their head.

Sincerely,

Jennifer Hobgood, Ph.D.
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Susan Lea Riggs
Sr. Director of Housing Policy
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cc. Kevin Tatreau, Development Finance

ⁱ Weiss, E., Gramann, S., Spain, V., & Slater, M. (2015). Goodbye to a good friend: An exploration of the re-homing of cats and dogs in the U.S. Open Journal of Animal Sciences. 5: 435- 456.
https://www.researchgate.net/publication/283563524_Goodbye_to_a_Good_Friend_An_Exploration_of_the_Re-Homing_of_Cats_and_Dogs_in_the_US.

ⁱⁱ Healthy Pets Healthy People, Centers for Disease Control and Prevention
<https://www.cdc.gov/healthypets/health-benefits/index.html> (April 30, 2014).

ⁱⁱⁱ Pet Ownership in Public Housing, 24 CFR 960, <https://www.law.cornell.edu/cfr/text/24/part-960/subpart-G> (March 29, 2000); Pet Ownership for the Elderly and Persons With Disabilities, 24 CFR Part 5, Subpart C, <https://www.law.cornell.edu/cfr/text/24/part-5/subpart-C> (Nov. 26, 2008).