



October 31, 2023

Marisa Button  
Florida Housing Finance Corporation  
227 North Bronough Street, Suite 5000  
Tallahassee, FL 32301

RE: POAH Comments on FHFC SAIL Live Local Program Redevelopment Category

Dear Ms. Button:

I am writing to offer comments on behalf of Preservation of Affordable Housing (POAH) in response to the SAIL Live Local Program and the Redevelopment category.

As you are aware, POAH is dedicated to the preservation and stewardship of existing, at-risk affordable housing. Since its founding in 2001, POAH has preserved or built more than 13,000 affordable homes in 11 states and DC. In Florida, POAH has preserved 8 affordable housing communities which provide homes for more than 2,000 people.

POAH is enthusiastic about the potential impact of the Live Local Act, and we appreciate the opportunity to engage with FHFC staff and other stakeholders. As FHFC finalizes the program policies for around funding for redevelopment as defined in the Live Local Act, POAH respectfully submits these comments for your consideration:

**Location of Replacement Units:** In POAH's experience, phased reconstruction is often the most efficient and least disruptive strategy for the renewal of a large, existing, distressed housing community. In this approach, the new development allows for the relocation of *a portion* of the original project's population, creating room for the redevelopment of a substantial section of the original site. Then a second cohort of residents can occupy the newly rebuilt portion of the original site, vacating another area of that site for reconstruction; and so on until the total number of affordable replacement units – including those built on and off-site - equal or exceed the original number of affordable units.

The Live Local Act statute requires that redevelopment projects provide for the construction of a new development near the existing site to which residents can be relocated while the original site is redeveloped. However, it does not require that all the residents be relocated to that new development at the same time. We urge FHFC to design program definitions which encompass phased redevelopment strategies in which some, but not all, residents are permanently relocated to a new housing community either off-site or to a newly developed on-site phase – a frequently employed best practice which is within the statutory authority.

POAH has used this phased strategy in several successful redevelopment efforts in other cities. It is a desirable approach because it is often impossible to secure a site to replace all existing units – let alone the additional mixed-income units that can support a better-integrated community – in close proximity to the original site. It also allows many residents to remain at the original site throughout the redevelopment effort which can make the transition to a new unit easier for some families.

**Prioritizing Readiness:** In defining its priorities for Live Local redevelopment projects, we strongly encourage FHFC to prioritize projects which have already started construction on units that will facilitate a phased redevelopment strategy, and those which have secured Choice Neighborhoods Implementation (CNI) grants to support their redevelopment efforts. Projects that have already started construction of off-sites affordable units with other funding sources can still meet the statutory language in the Live Local Act if a phased, on-site, redevelopment is also planned. The off-site units ensure that a portion of the site to be redeveloped will be available immediately and still allow for several on-site phases that can be funded by the Live Local Act. In addition, the off-site units not funded by the Live Local Act will also allow for a more diverse income-mix on the existing site since fewer affordable housing units are left to be replace.

Because of their complexity and significant local impacts, redevelopment projects with existing, occupied buildings require years of planning and predevelopment efforts to reach the point where construction efforts can begin. In order to ensure that FHFC's Live Local funds can have immediate impact, and not sit idle during long predevelopment periods, we encourage FHFC to prioritize funding for projects which (1) have already begun construction on units to facilitate phased redevelopment and (2) have secured substantial funding commitments for the onsite redevelopment effort proposed.

Within the latter category, we would encourage FHFC to prioritize projects with funding awards from HUD's CNI program – the primary federal program supporting the redevelopment existing assisted housing communities. These projects should be prioritized for Live Local funding since they leverage very significant non-FHFC funding to support for redevelopment, and are positioned to proceed quickly since completion of redevelopment planning and readiness to proceed are primary criteria for CNI awards. In addition, the CNI program requires that all existing affordable units be replaced. This obligation will help ensure that no affordable units are lost during the redevelopment of the on-site and off-site units.

**Flexibility in Income Mix:** We encourage FHFC to allow flexibility for the unit income-mix in redevelopment projects so long as the total number of affordable units are replaced. The priority should be the replacement of the affordable units. Any additional units to be built on the existing site can serve higher income levels; however, the number of higher income units should not be required. Any additional units above the replacement units will be dictated by zoning and other land use requirements for the site to be redeveloped.

In addition, projects with 20% or more unrestricted (market-rate) units are prioritized by the CNI program and are required if committed to in the application. However, the percent of unrestricted units can vary across the phases of the redevelopment (ie. a senior phase may only have 10% unrestricted units because of market demand so a family phase will need 30% unrestricted units to meet the total CNI required 20% commitment of unrestricted units across all phases of the redevelopment). For projects with CNI funds or other funding with unrestricted unit requirements,

please allow flexibility in the unit income mix between restricted and unrestricted units across the phases.

Thank you once again for your consideration. POAH sincerely appreciates the opportunity to share our perspective and appreciates FHFC's partnership and support.

Best,



Hana Eskra  
Vice President, Real Estate Development  
Preservation of Affordable Housing (POAH)

