

AFFORDABLE HOUSING TRUST FUND
PROPOSED NOFA
DRAFT COMMUNITY LAND TRUST – HOMEOWNERSHIP
NOTICE OF FUNDING AVAILABILITY (NOFA)
PUBLIC COMMENTS SUMMARY - BY ORGANIZATION
JULY 1, 2022

Background:

Round 3 of the Affordable Housing Trust Fund Community Land Trust Single-Family Homeownership NOFA was posted on DHCD’s website on June 3, 2022 for public comments. A copy of the Proposed NOFA is attached.

A public comment period officially opened on June 3, 2022 and concluded on July 1, 2022 at 4:30 PM EST. Those interested in offering comments had the option of submitting them through the Affordable Housing Trust Fund website or the DHCD.AHTFNOFA@BALTIMORECITY.GOV email address. Comments could be submitted by individuals and/or organizations. Individuals had the option of submitting their comments anonymously or could identify themselves. Organizations were required to provide contact information.

The public comment form consisted of two questions: describe your reaction to the proposed NOFA and describe any questions or concerns, which could include attachments for those wishing to provide additional details.

Summary of Comments Received:

DHCD received a total of 25 comments, which all were submitted electronically. Of the 25 comments submitted, 8 were submitted by individuals and 17 by organizations.

Comment #1:

Organization: Westport

Name: James Alston

- Supports NOFA
- In our current economic times, cost of living burdens are becoming more apparent. As such, new development for low-income housing should be a priority of the AHTF.



Comment #2:

Organization: You Are Not Alone Veterans Foundation

Name: Ronald Sykes

- Supports NOFA

Comment #3:

Organization: Ms Society

Name: Talai Hall

- Supports NOFA

Comment #4:

Organization: N/A

Name: Troy Joyner

- Doesn't Support NOFA

Comment #5:

Organization: JB Management

Name: Isaiah Moore

- Supports NOFA

Comment #6:

Organization: N/A

Name: Ericka Vinson

- Supports NOFA

Comment #7:

Organization: Homeownership

Name: Deconda Hines

- Supports NOFA

Comment #8:

Organization: Community Growth

Name: Lance Williams

- Supports NOFA
- I support Baltimore City promoting and encouraging citizens get involved in the cities NOFA program for development and growth.

- This is the type of program that creates a 'WIN-WIN" scenario for the city and its citizens, creating a bond between them that is both inspiring and profitable.
- After reading the draft copy of the NOFA document, I find its format organized and comprehensive as it lays out the policy, laws and by laws, process and goals/objectives of what it is trying to accomplish.

Comment #9:

Organization: Contractor

Name: Joseph Mack/Business Of Development

- Supports NOFA

Comment #10:

Organization: J&S Brown UHD

Name: Jewel Brown

- Supports NOFA
- My nonprofit organization wants to acquire city owned rowhouses renovate them and rent them for low-income single mothers. This program would help to redevelop a community that is in need of help for many years.

Comment #11:

Organization: N/A

Name: Richard Bergenstein

- Supports NOFA, but with reservations
- I own a rental apartment building at 2902 N. Loudon Street, 21216. My experience is the HCD is unable to function efficiently now. Therefore, I question their ability to manage additional activities.

Comment #12:

Organization: East Line Asphalt

Name: John Faulkner

- Supports NOFA

Comment #13:

Organization: Cynthia

Name: Cynthia Gross

- Supports NOFA, but with reservations



- This request indicates that the board of the (land trust) LT should be comprised of 1/3 community. Define that? I know at one time some LT boards had no residents of the community they were working on their boards. But had folk from other neighborhoods, communities on their boards.
- I think it is important that folk who live in the neighborhoods are driving development and redevelopment at all levels.

Comment #14:

Organization: N/A

Name: Aimee Harmon-Darrow

- Supports NOFA
- Since the intention of Community Land Trusts is to create affordability in high-cost areas, there should be a greater emphasis on where the projects are built. Projects shouldn't be built in areas that are already heavily subsidized in terms of housing.
- In the Achieving Equity section of the NOFA, it discusses location in terms of underserved communities, but those communities are already inundated with subsidized housing. Those communities are underserved in other city services.
- CLTs should be used to create housing in opportunity areas. New homeowners will not fully realize the benefit of the CLT if the project is located in a depressed market.
- The City should also consider scattered site housing as an option for this project. That could be used in densely populated areas with higher housing demand such as Federal Hill, Bolton Hill, etc.

Comment #15:

Organization: N/A

Name: Zina Martin

- Undecided

Comment #16:

Organization: DYKEMA

Name: Sheryl Bruce

- Supports NOFA, but with reservations
- Why would you not consider using these funds for purchasing city-owned properties? You could stipulate that this purchase can only be for the creation of affordable, low/moderate income housing in the neighborhoods where the properties are located. You are already well aware of the various neighborhoods in the City that truly need revitalization.
- You can also stipulate that any organization who purchases these properties has to offer residents existing in those areas the first option to become homeowners.

Comment #17:

Organization: Luxeon Dynamics

Name: Waldemar Clarke

- Undecided

Comment #18:

Organization: N/A

Name: Onyinye Alheri

- Supports NOFA
- Our city NEEDS community land trusts. Homeownership should not only be for the middle and upper class, but also and especially for low-income people.
- We must also invest in pathways to housing security that don't center homeownership. It is not a reality for many for several reasons.
- We need to center renters, who make up the majority of Baltimore residents.

Comment #19:

Organization: GYG Detailing & Carwash, LLC

Name: Brittany Butler

- Supports NOFA
- I believe that once that we build the city back up and we stand together the city will become whole again.

Comment #20:

Organization: Glam Queen Accessories

Name: Peggye Butler

- Supports NOFA
- I support building up my city and community that I live in.

Comment #21:

Organization: SHARE Baltimore Inc. c/o NEHI

Name: Peter Sabonis

- Supports NOFA, but with reservations
- DHCD should amend the NOFA to strike the requirement that “applicants shall have the capacity to undertake and complete projects in no more than two years from executing a funding agreement,” as the delays in the city’s ATHF funding agreement and disposition process has, to date, made this difficult to impossible.

- The NOFA should be amended by adding the following, “Each grantee shall be entitled to an advance of funds up to 25% of the award.”
- The NOFA should be amended to eliminate the “maximum per unit” limitation of \$50,000, as this amount, given total development costs is limiting our ability to keep homeownership housing affordable to those at 50% AMI and lower.
- The NOFA should be amended to eliminate the limitation of pre-development/acquisition costs to 25%. CLTs operating in certain communities need the flexibility to go beyond 25% in pre-development/acquisition.
- The NOFA should be amended to indicate that the “City Buy” vendor registration system shall be a post award requirement and that DHCD use this system to pay AHTF grantees.

Comment #22:

Organization: University of Maryland School of Social Work

Name: Lauren Siegel

- Supports NOFA, but with reservations
- CLT funds should not be geared to only homeownership. Thousands of homeless and low-income people need affordable rental housing through a CLT, and Baltimore has none. This is especially important given that the waiting lists for public housing and Housing Choice vouchers in Baltimore have been closed for years.
- As a social worker and Professor at the University of Maryland School of Social Work, I have seen firsthand the problems this creates. People paying 40-80% of their income for housing that is not affordable to them are in danger of eviction, utilities shut-offs, and no funds for transportation or medication copays.
- We need rental housing affordable to the poorest families (income 30% of the AMI or lower).
- Please consider funding that permits CLT's to develop rental units for the poorest people.

Comment #23:

Organization: Common Ground CLT

Name: Jeff Singer

- Supports NOFA, but with reservations
- As we understand it, this is the only NOFA for CLTs. Yet, it does not include rental housing. This is outrageous for three reasons:

1. CLTs nationwide in 2017 provided 85,612 units of housing and 42% of those (35,926 units) were rental.
2. The City Charter language that created and governs the AHTF says this about funding CLTs: "providing capital and operating assistance for the

creation of community land trusts that will develop, own, or operate permanently affordable rental housing and assist low income residents to build a path to homeownership." (Art. 1, Sec. 14(A)(3).

3. Homeownership for most households with extremely low incomes can lead to unresolved housing problems and the inability to pay for maintenance and make repairs. Evictions and homelessness can result. We must sever the relationship between income/wealth and housing in order to achieve housing justice.

- It is mystifying if not downright unlawful for CLTs to be denied AHTF money for rental housing. If this continues, we may have to seek legal redress.

Comment #24:

Organization: N/A

Name: Kai Young

- Supports NOFA, but with reservations
- If only \$4M is being made available at this time, maxing out each proposal's request limit at \$1M seem a bit excessive? If 4 ultra-qualified applicants submitted a proposal each for the full amt, only 4 bids would be executed. Unsure of the balance y'all are trying to strike with that

Comment #25:

Organization: N/A

Name: Peyton Wise

- **Undecided-Standard of Proof for Community Representation; Rights of Veto for Community or CLT**
- While the NOFA states that funding cannot be used to acquire City-owned property, it does not make clear whether or not a CLT which does not manage to acquire City-owned land or buildings within its "boundaries" has any say over what might happen on that City-owned property.
- Nor does the NOFA make clear whether neighborhoods have the right to reject any CLTs or CLT projects they don't like; or whether residents will even be notified of a pending CLT application.
- While the section on "Funding Limits" (#4) says that "Applicants that request funds for multiple projects in the same community will be required to demonstrate how these projects support a community plan or other strategic revitalization initiative, along with market data supporting the need for permanent affordability."

- Later in the listing of “Bonus Points” (Sec. 9, page 10) for “Collaboration Across Multiple Neighborhoods” applicant must “provide documentation ... how multiple stakeholders are working collaboratively to achieve outcomes” - although what constitutes documentation is not clear.
- If community input is part of the scoring for the NOFA, why does the City have no standard for ensuring real representation by groups claiming to speak for a particular community? In other words, given the lack of detail as to what constitutes “documentation” of stakeholder participation or community input, it appears that an applicant could get credit simply by citing the support of a group which only claims to speak for the community but in fact does not. This currently happens in many neighborhoods with respect to zoning variance applications, RFPs, demolitions of vacant houses, etc.
- Reservoir Hill, for example, has a large number of groups (possibly as many as 30) all claiming to represent the neighborhood, and submitting letters to the Council on behalf of developers without the knowledge of the majority of the residents. Further west, there are groups which seem to have the ear of Planning and others in City government but are widely disliked by the residents, and also claim to speak for all.
- The NOFA, and other City policies, need to have a quantifiable standard for proof of actual community input; just as the scoring cited above requires “market data” supporting the need for the CLT (the section on Bonus Points (p.10) calls for “documentation ... of how multiple stakeholders are working collaboratively to achieve outcomes”, although “documentation” is not defined).
- Continuing on the need for community input, documentation of the same should not be scored as a “bonus”, but should be a basic requirement for all applicants; and the City needs to announce any of the applicants planning to work in a given community and allow the community to comment on and, if they desire, call on the City to reject the application.