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Mission

The Housing Leadership Council of Palm Beach County, Inc. is an action-oriented coalition of business, civic and community leaders working to identify strategic solutions and funding options to the workforce housing shortage in Palm Beach County. Its primary goal is to increase the availability of attainable housing throughout Palm Beach County for workers at all income levels.

February 5, 2013

Mr. Kevin Tatreau
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, Florida 32301

RE: Preservation for Palm Beach County

Dear Mr. Tatreau:

Please accept this comment concerning the recent board approved RFA for the special allocation of credits in 2013. We are pleased to learn that the RFA will include funding opportunities for special needs programs targeting veteran's housing and public housing preservation. Our comment concerns the proposed limitation of public housing preservation to small and medium counties.

The purported reason for focus on small and medium counties is to create greater parity of geographic distribution of housing credits. The goal will be to equitably distribute credits throughout the State in light of the amount of credits awarded to Large Counties in the 2011 Universal Cycle. However it is important to note that one Large County, Palm Beach County, did not receive any Preservation Funding in the 2011 Universal Cycle.

Palm Beach County should not be unfairly penalized for the windfall that went to other Large Counties, especially after the post-ranking proceedings. We submit that instead of lumping all Large Counties together as being non-prioritized for the upcoming RFP for Preservation Applications, please consider a carve out for Palm Beach County, which did not receive any Preservation funding in the 2011 Universal Cycle.

Otherwise, many financial viable and worthy preservations deals in Palm Beach County, which houses some of the oldest public housing projects in the State, will be unfairly prevented from applying for the only funding that may be available to save this scarce resource. Conversely, large PHA's in small and medium counties, such as Volusia and Polk counties, with HOPE VI funds and multiple LIHTC deals will be eligible to apply.



The following is a Large County breakdown of the \$20,611,311 allocated through final ranking for Preservation Set-Aside development in the 2011 Universal Cycle:

Large County Preservation Funding

Miami-Dade	\$3,645,945
Broward	\$1,801,818
Palm Beach	\$ 0
Hillsborough	\$1,835,712
Orange	\$1,121,031
Pinellas	\$1,350,000
Duval	\$1,029,554

Small & Medium County Preservation Funding

Total \$9,827,631

Moreover, as a result of the post-ranking proceedings, an *additional* \$717,500 of Preservation Funding was allocated to a project in Duval County, and an *additional* \$3,863,642 was allocated for two Miami-Dade Preservation projects. No Preservation Funding was awarded to Palm Beach County during the post-ranking proceedings of the 2011 Universal Cycle.

We respectfully request that in addition to prioritizing Small and Medium Counties, **please also include Palm Beach County as a priority for upcoming Preservation Applications or RFAs.**

Sincerely,

Suzanne P Cabrera, CFRE
President & CEO
Housing Leadership Council of Palm Beach County