



County Administration

P.O. Box 1989

West Palm Beach, FL 33402-1989

(561) 355-2030

FAX: (561) 355-3982

www.pbcgov.com



**Palm Beach County
Board of County
Commissioners**

Steven L. Abrams, Chairman

Priscilla A. Taylor, Vice Chair

Hal R. Valeche

Paulette Burdick

Shelley Vana

Mary Lou Berger

Jess R. Santamaria

County Administrator

Robert Weisman

"An Equal Opportunity
Affirmative Action Employer"

February 15, 2013

Mr. Steve Auger, Executive Director
Florida Housing Finance Corp.
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Request for Applications – 2013 Housing Credits

Dear Mr. Auger:

We appreciate the opportunity to comment on the proposed Request for Applications, for Small and Medium County Public Housing Authority ("PHA") redevelopments. It is important to highlight that PHA sizes vary based on number of Annual Contribution Contract units, not geographic location. The Pahokee Housing Authority, is a Medium PHA with units ranging in the 250-1249 count, which means that it is a Medium PHA located within a Large County (more specifically, Palm Beach County). We ask that that FHFC consider this Request for Applications be limited to a specific PHA size and not by county size. We believe that this would accomplish the same objective.

Our second comment is based on the previous Set-Aside for Florida Keys Developments, which was based on an economic sustainability issue and has been in play for quite a few years. We ask that Florida Housing Finance Corp. consider other cities and areas in addition to or in lieu of the Florida Keys.


The Legislature, under Section 288.0656 of Florida Statutes, has created the Rural Economic Development Initiative (REDI). As per the F.S. "Recognizing that rural communities and regions continue to face extraordinary challenges in their efforts to significantly improve their economies, specifically in terms of personal income, job creation, average wages, and strong tax bases, it is the intent of the Legislature to encourage and facilitate the location and expansion of major economic development projects of significant scale in such rural communities."

Pahokee has been recognized under this designation, because it meets the criteria outlined below:

1. Have an employment base that is dominated by traditional agricultural or resource-based industries (defined by Census Data);
2. Have a population of 25,000 or less;
3. Be an unincorporated federal enterprise community, or an incorporated rural city that is not located in a designated rural county; and
4. Have at least three or more economic distress factors equal to or greater than similar designated rural communities:
 - a. low per capita income;
 - b. low per capita taxable values;
 - c. high unemployment;
 - d. high underemployment;
 - e. low weekly earned wages;
 - f. low housing values;
 - g. high percentages of the population receiving public assistance; and
 - h. high poverty levels.

Development of units in this specially designated area will not only boost the economy and create jobs, but also provide much needed housing in a severely economically challenged city. HUD mixed finance developments or other PHA developments utilizing federal funds require the local hiring of low income persons (Section 3) and payment of Davis Bacon wages.

Sincerely,


Shannon R. LaRocque, P.E.
Assistant County Administrator