

WENDOVER

HOUSING PARTNERS, LLC
1105 KENSINGTON PARK DRIVE, SUITE 200
ALTAMONTE SPRINGS, FLORIDA 32714

TEL: (407) 333-3233 FAX: (407) 333-3919

Proposed Mandatory Distance Requirement and Proximity List Changes:

Wendover would like to propose a reduction to the Mandatory Distance Requirement (at least for Elderly developments if not for all product types):

- From 2.0 miles to 0.5 miles in Large Counties (except Dade and Broward where it is already equal to this)
- From 2.5 miles to 1.0 mile in Medium Counties (at least in the “most dense” or highest populated Medium Counties)
- Further the ability for a developer to build within the Mandatory Distance Requirement if their own development is the one that is on the Proximity List

Wendover would like to propose the following changes to the Proximity List itself:

- The “30 unit or less” caveat is essentially moot at this point except in areas like the Keys, because new deals that small are almost non-existent
- Deals that have reached 100% occupancy within 6 months of opening should be removed from the Proximity List. A rapid rise to 100% occupancy proves immediate area’s demand

Rationale:

1. Proximity List was essentially created to prevent cannibalization when many 9% deals were 200+ units
 - a. Unit counts per 9% award are now typically 120 units or less
 - b. Risk of cannibalization is small when new developments are 120 units or less, especially for Elderly Developments
 - c. DDA’s were county-wide when the Proximity List was created
 - i. Proximity List encouraged development in various areas of counties
 - ii. Affordable housing, in theory, would then not be overly concentrated in a single area
 - iii. The new SADDA methodology exists to disrupt the above theory
 - d. Level of service for all affordable product types, particularly Elderly, in many counties is critically low already (quantitative information on this is available)
2. Proximity List issues with new SADDA methodology
 - a. Many counties around Florida have very small SADDA areas, and the Proximity List coupled with a reduced DDA essentially eliminates them from funding
 - b. The SADDA’s and required minimum Proximity Score already limit the location of affordable housing around the State of Florida
 - c. The Proximity List is no longer necessary to ensure even distribution of affordable housing product within counties
3. Elderly housing and the Proximity List
 - a. Elderly affordable housing is in very high demand throughout Florida
 - b. Quick analysis of FHFC occupancy report shows ~97% overall occupancy in existing Elderly inventory
 - c. Wendover’s 2 most recent Elderly developments have reached 100% occupancy within 30-60 days. Massive waiting lists already in place.
4. Proximity List includes pipeline deals and existing deals that are already 100% leased
 - a. Funded deals in the 2016/17 RFA’s will not be open for 18-24 months, giving the existing newer inventory plenty of time to maintain or gain occupancy
 - b. There are several deals from 2014 RFA’s that are still on Proximity List