From: Mark Hendrickson < <u>mark@thehendricksoncompany.com</u>>

Date: June 26, 2017 at 5:06:03 PM EDT

To: Trey Price Trey.Price@floridahousing.org, Ken Reecy Ken.Reecy@floridahousing.org

Cc: Nancy Muller < Nancy. Muller@floridahousing.org>, Kevin Tatreau

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Subject: Comment from Mark Hendrickson on Local Government Area of Opportunity

Trey, Ken and Group

Attached is a comment from me on the Local Government Area of Opportunity. I haven't repeated everything from Tripp Gulliford and Debra Koehler's letters, as I think they cover the subject extremely well.

However, I am commenting on one false criticism that was stated at the last Workshop and in at least one comment you received—that the amount of money required somehow locks out the residents of smaller cities from the opportunity for funding. All cities that are not entitlement cities are served by their County Housing departments. When a County receives SHIP, HOME, and CDBG funds, they are available for the unincorporated county **and all non-entitlement cities**. For example, Eatonville was cited at the workshop as being excluded. Orange County serves Eatonville, and they would be free to choose a priority development located in Eatonville, as one example. When the HFA of Hillsborough County issued its Area of Opportunity NOFA, it invited applications from Temple Terrace and Plant City, in addition to the unincorporated county. Entitlement cities received state and federal housing monies directly and can fund the Area of Opportunity if they choose to do so.

Thanks

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June 25, 2017

Mr. Trey Price Executive Director Florida Housing Finance Corporation 227 North Bronough, Suite 5000 Tallahassee, Florida 32301

Re: Local Government Area of Opportunity Funding

Dear Mr. Price:

Thank you for the opportunity to comment on the Local Government Area of Opportunity Funding system within the FHFC scoring system for 9% Housing Credits.

First, I am not going to repeat all of the valid reasons for keeping this excellent part of the scoring system that were detailed in the letters from the HFA of Hillsborough County and the Jacksonville HFA. I concur with the facts and recommendations in those letters.

Instead I am writing to dispel a false notion that was used in both the June 15 Workshop and in at least one letter to FHFC as a supposed reason to eliminate the Area of Opportunity Funding. Specifically, persons have stated that small cities cannot afford the contribution, and therefore their residents are somehow "cut out" of the potential for Housing Credit developments.

County housing programs in all large counties serve the entire unincorporated county <u>and all non-entitlement cities</u>. For example (this was mentioned at the workshop) Eatonville, in Orange County DOES have access to housing funding because Eatonville and its residents are served by the SHIP, HOME and CDBG programs operated by Orange County.

Another example—Hillsborough County serves Temple Terrace and Plant City. When the HFA of Hillsborough County issued its NOFA for the Area of Opportunity Funding, developments from unincorporated County, Temple Terrace, and Plant City were all invited to apply.

Therefore, the notion that these communities don't have the money is spurious, in that the money for those areas is available at the County level—and the County serves those areas.

The entitlement cities within each County have access directly to SHIP, CDBG, and HOME funds.

2. All large county HFA's have the resources to meet the funding requirements for the Area of Opportunity. County HFA's serve their entire County, and are another source of funding for developments located in smaller cities.

To be direct, this is simply another argument being advanced by large developers who wish to return to a lottery based system. The facts do not support their contention. County housing programs and HFA housing programs serve all areas of the County that do not receive direct SHIP, HOME and CDBG funding.

Sincerely,

Mark Hendrickson

President, The Hendrickson Company

cc: Ken Reecy

Kevin Tatreau