

From: Stephanie M. Lampe <Stephanie.Lampe@stpete.org>
Sent: Thursday, August 16, 2018 4:49 PM
To: Marisa Button <Marisa.Button@floridahousing.org>
Cc: Kevin Tatreau <Kevin.Tatreau@floridahousing.org>; Joshua A. Johnson <Joshua.Johnson@stpete.org>; Robert M Gerdes <Robert.Gerdes@stpete.org>
Subject: Public Comment re: RFA 2018-112

Hello Marisa,

Please see the attached comments from the City of St. Petersburg regarding RFA 2018-112.

Thank you.

Stephanie Lampe
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August 16, 2018

Florida Housing Finance Corporation
c/o Ms. Marisa Button, Director of Multifamily Allocations
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32302

RE: Public Comment on RFA 2018-112 and the Proposed Goal of Funding One Family Development located in a Geographic Area of Opportunity in Pinellas County

Dear Ms. Button:

Thank you for providing us with the chance to comment on RFA 2018-112. We understand that Florida Housing Finance Corporation ("FHFC") is proposing a new goal to fund "one Family Development located in a Geographic Area of Opportunity("GAO") in Pinellas County." This proposal will have the effect of restricting the tax credit award in Pinellas County this year to only those proposed developments with a family demographic that are located within the GAO. We read the Public Comment provided by Sarah Pape, Esquire on August 13th and we agree with the issues listed and solutions proposed in her letter (see attached).

1. **Timing:** We agree that it is too late in the game for FHFC to introduce this new family GAO funding goal into the 2018 cycle and that FHFC should use this year to develop a pre-determined list and selection order for the six counties to be used in the future. Publicize the information now so that the Applicants and local governments will have adequate time to find the appropriate site and seek the necessary local approvals for both the site and the funding prior to next year's competition.
2. **Elderly vs. Family:** There is an equal need for family and elderly affordable housing in Pinellas County which can be evidenced by the recently opened Burlington Post Development which was fully leased and occupied only 3 days after its grand opening. We believe that if FHFC is determined to require two family deals be funded in GAOs as part of the 2018 cycle, then FHFC should not begin with Pinellas, since Pinellas was just awarded a family deal in 2017.
3. **County selection process:** Pinellas seems to have been selected arbitrarily for this year's funding goal. While Broward has the chance to submit both a family and an elderly deal, Pinellas has no choice but to hope that someone can quickly identify a family site that meets the full proximity requirements. We believe that the county selected for the family GAO goal should be based on a study which clearly indicates a significant need for family units over elderly units.

The City of St. Petersburg would like to submit several additional reasons to delay the addition of the Family GAO funding goal for implementation in Pinellas County until 2019:

1. The lack of vacant land in the most densely populated County in the State makes it more difficult to identify sites in a short period of time that will meet both the FHFC GAO and the maximum required proximity points. For example, we are aware of a potential site that is in a GAO, but it is further than 2 miles from a public school and therefore will not meet the proximity requirements. To further complicate the process, the majority of the land area identified as GAO by FHFC is currently developed as single-family housing, which significantly restricts the number of possible sites available for multi-family development.
2. If FHFC is concerned that the use of the LGAO funding priority has focused too many developments away from the GAO areas and into local redevelopment areas, please be aware that the City has already instituted a process of deconcentrating family assisted housing developments and we have worked to ensure that family affordable developments will be scattered around the City as much as possible (map attached).

We sincerely appreciate the work that FHFC has done in the past and we are grateful for the quality developments that the 9% tax credit process has produced to date within the City of St. Petersburg. We do however, respectfully request your consideration of our concerns and we hope that you will delay implementation of the GAO family funding goal until next year.

Please feel free to contact me with any questions at 727-893-7876.

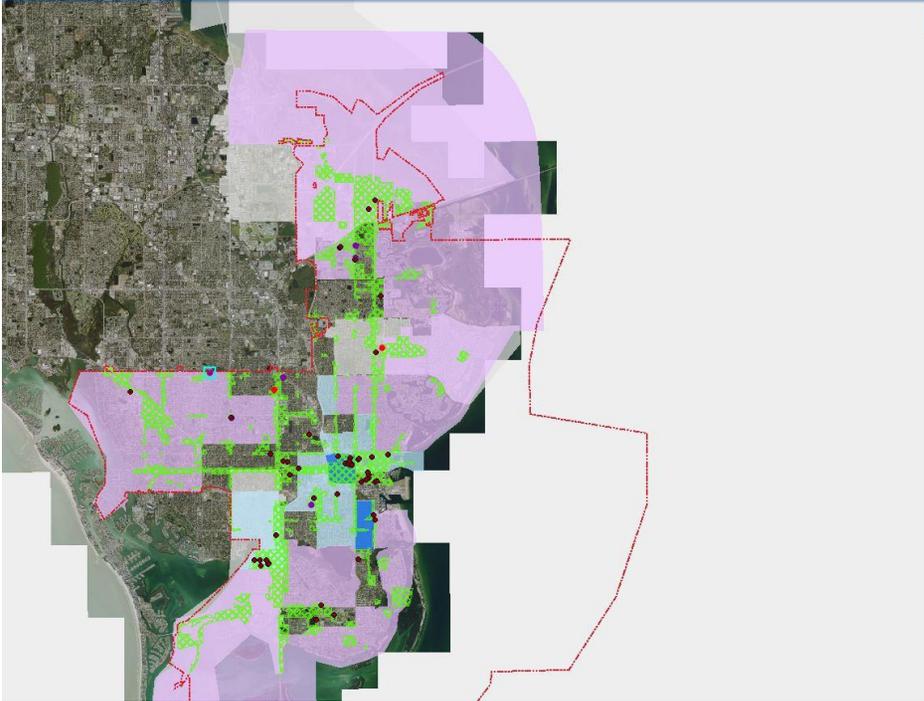
Sincerely,



Robert Gerdes,
Neighborhood Affairs Administrator

cc: Joshua A. Johnson, Director, Housing & Community Development
Stephanie Lampe, Sr. Housing & Community Development Coordinator

Enclosure: Letter from Sarah Pape, Esq.
Map of Assisted Housing and GAO areas in St. Petersburg



Legend

- City Limits**
 - City Limit Line
- Assisted Housing Study**
 - Assisted Housing
 - St Petersburg Housing Authority
 - Public Housing
 - Affordable Housing
 - Zoned Multi-Family
 - Racially and Ethnically Concentrated Areas of Poverty, Effective 06-01-18
 - Qualified Census Tracts, Effective 01-01-18
 - Geographic Areas of Opportunity, Effective 06-28-18
 - Small Area Difficult Development Areas, Effective 06-01-18



Sarah Pape, Esquire
spape@zkslawfirm.com

August 13, 2018

Sent via Email & U.S. Mail

Florida Housing Finance Corporation
c/o Marisa Button, Director of Multifamily Allocations
227 N Bronough Street, Suite 5000
Tallahassee, FL 32301
marisa.button@floridahousing.org

Re: Public Comment re RFA 2018-112 – Housing Credit Financing for Affordable Housing Developments located in Broward, Duval, Hillsborough, Orange, Palm Beach, and Pinellas Counties – Proposed Funding Goal of One Family Development Located in a Geographic Area of Opportunity in Pinellas County

Dear Marisa:

We are writing on behalf of American Residential Communities, LLC (“ARC”), and with respect to a proposed change to the Large County Geographic RFA that has been proposed by Florida Housing Finance Corporation (“FHFC”). We understand that FHFC is proposing a funding goal of “one Family Development located in a Geographic Areas of Opportunity (“Family GAO Funding Goal”) in Pinellas County.” The Family GAO Funding Goal will have the effect of restricting the tax credit award in Pinellas County to only those developments with a family demographic. We further understand from staff that the proposal will be to rotate the Family GAO Funding Goal in future RFA cycles so that no county will have this funding goal in consecutive cycles. ARC has serious concerns with this proposed change to the Large County RFA, which we have outlined below.

ISSUE NO. 1: Timing

The timing in which FHFC is proposing the Family GAO Funding Goal is concerning. We believe is too late in the game for FHFC to introduce this new funding goal into this funding cycle. In 2016, FHFC introduced into its Large County RFA process the concept of a Local Government Area of Opportunity Preference (the “Preference”). To qualify for the Preference, applicants must obtain a significant financial commitment from the local government. By way of example, in RFA 2017-113, the minimum amount that a local government was required to contribute in order for an Applicant to obtain the Preference was \$472,000.00 (for garden-wood building types) and the maximum amount required was \$559,000.00 (for non-garden rehab

building types).¹ Due to the significant amount of money that a local government must contribute, Applicants and Developers must start working with their local governments well in advance of the publication of the RFA. The implementation of the Family GAO Funding Goal in Pinellas County will have the effect of eliminating the Preference from consideration in Pinellas County. Therefore, adding the Family GAO Funding Goal will be prejudicial to the local governments and Applicants and Developers who have been working together for the past several months to obtain the necessary funding for the Preference in order to obtain affordable housing in their communities.

Solution:

Do not implement the Family GAO Funding Goal for this RFA cycle. Instead, if FHFC is intent on having such a Family GAO Funding Goal, then FHFC should use this year to develop a pre-determined list and selection order for the six counties. FHFC should publicize that information to Applicants, Developers, and local governments so that the Applicants, Developers, and local governments will know where to devote their resources in order to ensure that the affordable housing developments are built where needed.

ISSUE NO. 2: Lack of New Affordable Housing for Seniors in Pinellas County

In last year's funding cycle, the Tax Credit Award for the Large County RFA (RFA 2017-113) went to a family project in Pinellas County. If FHFC implements the Family GAO Funding Goal in Pinellas County for this year's Large County RFA, then it will make two consecutive years for a family demographic project in Pinellas County. Pinellas County is in need of affordable housing for its seniors, and the Family GAO Funding Goal will deprive seniors of such housing.

Solution: ARC believes that FHFC should not add the Family GAO Funding Goal to the funding cycle for this year, as more specifically described above. However, if FHFC is intent on naming a specific county for a Family GAO Funding Goal, then FHFC should begin by identifying a county that received a tax credit award in last year's Large County RFA for an elderly demographic.

ISSUE NO. 3: Arbitrary Decision Identifying Pinellas County

FHFC has stated that the justification for identifying Pinellas County as the Family GAO Funding Goal is that the majority of applications submitted for Pinellas County over the last few years have been family demographic applications. That method of identifying the Family GAO Funding Goal preference is arbitrary. Just because Developers in the past have submitted

¹ For applicants in Broward County, the contribution was even more: A minimum of \$495,250.00 (for garden-wood building types) and a maximum of \$586,250.00 (for non-garden rehab building types).

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applications for family demographic does not mean that there is not a need for senior housing in Pinellas County.

Solution: At a minimum, if FHFC intends to select a single county for a Family GAO Funding Goal, then that decision should be based upon a study that identifies market conditions and actual quantified data.

Thank you for the opportunity to comment on the proposed changes to the Large County RFA process. We look forward to hearing from you and FHFC.

Respectfully submitted,



Sarah Pape

SLP/kag

cc: Tim Schulte, Esq. (via email)