

July 24, 2019

Ms. Marisa Button  
Director of Multifamily Allocations  
Florida Housing Finance Corporation  
227 North Bronough Street, Suite 5000  
Tallahassee, Florida 32301

VIA EMAIL ONLY TO: [Marisa.button@floridahousing.org](mailto:Marisa.button@floridahousing.org)

Re: Medium County RFA—Local Government Area Opportunity Funding (“LGAOF”) or  
(the “Preference”)

Dear Ms. Button:

I am writing this letter on behalf of the City of Gainesville expressing concerns about FHFC’s position on the Preference Funding Goal rule for medium size counties. As explained by FHFC in the June 5<sup>th</sup> Workshop, FHFC’s position appears to prohibit any developer, including housing authorities and nonprofit organizations, from submitting an application for a Preference Funding Goal Development in a county where a Preference Funding Goal Development was selected for funding in the previous application cycle. This would be the case even if a Development was selected for a funding goal other than the Preference Funding Goal or if the Development was selected by a straight lottery, not by any of the applicable funding goals. To be clear, as long as a Development qualified for the Preference Funding Goal, regardless of how it actually wins an allocation, no Developments from that county will be eligible for the Preference Funding Goal the following year.

This appears to contradict RFA 2018-110, Section Five, B.1. “Goals,” which reads as follows:

“\*Note: During the Funding Selection Process outlined below, Developments selected for these goals will only count toward one goal. For example, if a Development is selected for the Elderly ALF goal but also qualifies for the Non-Profit goal, the Development will only count towards the Elderly ALF goal and another Development will be considered for the Non-Profit goal.”

This new FHFC position would make all Preference Funding Goal Developments in Gainesville and/or Alachua County ineligible for funding in the upcoming cycle, because of the funding of Deer Creek Development. In the future, this would apply to any medium size county with the same circumstances.

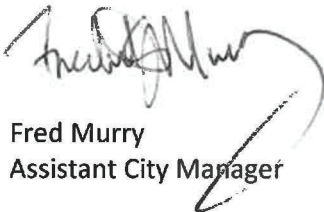
Considering the impacts of this position on medium sized counties, the City requests that FHFC take the following actions:

- reconsider its June 5<sup>th</sup> position to be more consistent with Section Five, B.1. of RFA 2018-110; and
- determine that, since Deer Creek was chosen to be funded under the Nonprofit Goal (rather than the Preference Funding Goal), the FHFC will accept Preference Funding Goal Developments located in Alachua County during this RFA Cycle.

The City of Gainesville appreciates the opportunity to provide comments on this matter. If you would like to discuss this further, please do not hesitate to contact John Wachtel, Neighborhood Planning Coordinator (by email at [watcheljs@cityofgainesville.org](mailto:watcheljs@cityofgainesville.org), or by telephone at 352-393-8565), or Fred Murry, Assistant City Manager (by email at [murryfi@cityofgainesville.org](mailto:murryfi@cityofgainesville.org), or by telephone at 352-334-5010).

We looked forward to hearing from you on the proposed rule.

Sincerely,



Fred Murry  
Assistant City Manager

Cc: Jacqueline Richardson, Housing and Community Development Manager  
John Wachtel, Neighborhood Planning Coordinator