

McCurdy Senior Housing Corporation

Quiet Waters
306 SW 10th Street
Belle Glade, Florida 33430

via e-mail at RFA_2019-116_Questions@floridahousing.org

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

Dear Marisa:

McCurdy Senior Housing Corporation is a 501(c)3 non-profit organization whose mission is to assist in the delivery of affordable housing opportunities, along with targeted supportive services, to low and extremely low-income households with an emphasis in elderly housing primarily in the Glades region of Palm Beach County. We are experienced, have successful communities and anticipate expanding our successful Quiet Waters (aka McCurdy Center) elderly community. We have reviewed the drafts of the Corporation's RFA 2019-116 that provides SAIL funding for communities that also anticipate securing noncompetitive 4% tax credits matched with tax exempt bonds, and RFA 2019-114 that is intended to award 9% tax credits...and have the following comments/suggestions:

Background:

Elderly housing that provides supportive services is in very high demand throughout Palm Beach County, especially in the Glades region. The demand will increase as our populations age and set-aside elderly housing units come off-line. Elderly communities are a positive element for their locale, providing employment opportunities for locals that assist with supportive services such as home health care, activities, meals, medications, medical care and property management. These jobs do not go away when construction is completed but rather expands as the population ages and increases. This special population served are on fixed incomes while their care, social, and medical needs increase. There should be a greater emphasis on the development of affordable elder housing in Palm Beach County.

Comments/Recommendations for RFA 2019-116:

- The Current RFA for SAIL financing to be used in conjunction with Tax-Exempt Bonds and 4% HTC, RFA 2019-116, is in Draft Form and seeks to award 4 applications in Large Counties including Dade and Broward. Only 1 of these applications is targeted to be Elderly.
 - The method of selection significantly disadvantages elderly applications in Palm Beach County and other large counties outside of Broward and Dade. (Page 80 of RFA Draft.)
 - Per the Selection process the first two applications that will be selected must be the top-rated applications in Broward or Dade. If either of these are Elderly applications, then no other Elderly applications in a Large County will be considered.

- We recommend the FHFC modify the selection criteria for RFA 2019-116 to allow the first selection to be the highest ranked elderly application in any large county including Broward and Dade, followed by the family applications as the FHFC sees fit.
 - This way all the elderly applications in large counties can complete on a level playing field and the best elderly applications will be selected.
 - Granting this request would still allow all the stated goals to be met but removes the unfair disadvantage to elderly applications located in large counties outside of Dade and Broward Counties.
- Due to the specific need for affordable elderly housing in Palm Beach County, we also recommend that the stated goals be modified to allow for 2 elderly applications to be funded in Large Counties as opposed to the current goal which will only fund one elderly application.

Comments/Recommendations for RFA 2019-114:

- The Current RFA for 9% Housing Tax Credits, RFA 2019-114, issued by Florida Housing Finance Corporation will select up to 7 Applications to receive an award of Tax Credits this cycle. This includes family or elderly applications in Broward, Hillsborough, Orange and Pinellas County but excludes elderly applications in Palm Beach and Duval Counties.
 - This RFA also excludes any developments in a RECAP census tract which would also disqualify Quiet Meadows, an anticipated expansion of the Quiet Waters elderly/disabled adult community.

Palm Beach County has a significant need for affordable Elderly housing and objects to Elderly applications being both excluded from the RFA for 9% tax credits and severely disadvantaged from the RFA for SAIL Financing. As such we strongly recommend FHFC to consider the above comments and recommendations.

Thank you for your consideration.

Respectfully,



Joseph Glucksmann
President