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July 6, 2020

John W. Hurt
Executive Director

Matthew C. Russell
Board Attorney

Mr. Trey Price and Ms. Marisa Button
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Inclusive RFA changes for publicly owned Sites in the 2020/2021 RFA General Process

Dear Mr. Price and Ms. Button,

Public Housing Authorities ("PHAs") have the ability to use federal funds available to them to finance gaps and make developments financially stronger in some areas. Florida Housing should take advantage of those additional resources for the creation of additional units. For that purpose, we suggest the Corporation to do the following adjustments to the upcoming competitive RFAs:

1. PHAs to be capable of providing LGAO. Both Agendas provided for the March 5 and May 29 RFA Funding Cycle Workshops outline goals in the Large and Medium County applications that give a preference for sites that receive a contribution from a Local Government ("LGAO"). In these instances, Local Government is defined as a County or municipality (i.e. a city or town that has a local government), leaving out Public Housing Authority sites.
2. Incorporating a specific LGAO goal for an application that has (as site control requirement) an executed ground lease with a PHA to be able to gain:
 - 1 of the 5 LGAO preference spots in the Medium County RFA; and
 - 1 preference/goal in the SAIL RFA.
3. Making all applications that have (as site control requirement) an executed ground lease with a PHA, a City or a County a Priority I app in both the Medium and Miami-Dade RFAs and adding an exception for them for being counted against the 3 Priority I limit. Both Agendas provided for the March 5, 2020 and May 29, 2020 RFA Funding Cycle Workshops outline a Priority Designation system for both Medium/Small and Miami-Dade County RFAs. Although we concur that this method can be a great tool for decreasing the number of applications from private developers, it inevitably has a similar effect on publicly-owned land due to the nature of public-private-partnerships that are necessary to develop such sites. Therefore:
 - Providing Priority I status to these public sites is necessary to not limit the ability to submit publicly owned land, as opposed to privately owned land. Allowing only 3 Priority I Applications per Related Party means that many of the PHA sites, as well as many of the City or County owned sites, are limited to also just 3 applications each.

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- Adding the exception for these sites (publicly owned with ground leases) against the 3 Priority I limit is necessary to protect public-private partnerships, which have been a strong public strategic policy of the State of Florida. PHAs, Cities and Counties make use of the experience and lending capabilities (higher guarantee limits) of private developers to form public-private partnerships to both build new housing and redevelop existing housing. PHAs, Cities and Counties already have gone through competitive processes with different developers (even before Priority I was invented) for more than 3 sites and have no way of instructing or selecting which sites should be applied for as Priority I without violating most of these agreements.

We hope consideration of these issues can be extended to all appropriate RFAs in this funding cycle.

Respectfully submitted,

John W. Hurt
Executive Director