

From: gtkempe <gtkempe@neighborhoodrenaissance.org>
Sent: Wednesday, September 29, 2021 2:43 PM
To: Jean Salmonsens <Jean.Salmonsens@floridahousing.org>
Subject: Public Comment for RFA 2021-204

Dear Ms. Salmonsens,

Thank you for the opportunity to provide a public comment for RFA 2021-204.

Under this focused but unfortunately limited RFA, Florida Housing expects to offer “an estimated \$4,075,000 of Housing Credits to qualified Applicants that commit to preserve existing affordable multifamily housing developments located in Medium and Large Counties for the demographic categories of Families, the Elderly, and Persons with a Disability.” Eligible projects for rehabilitation in limited to “existing development(s) at least 20 years old as of an Application Deadline in a competitive solicitation and has an active contract” through various HUD or RD programs. Accordingly, most applicants will be public housing authorities or other entities providing public housing assisted through ACC. All proposed developments “must consist of a minimum of 30 total units,” and proposed developments with a demographic commitment of Family, Elderly Non-ALF, or Person with a Disability cannot exceed 250 total units, or must not exceed 125 units for Elderly ALF alone.

The concern I wish to raise is that this RFA is targeted to serve a very limited number of undoubtedly worthy projects while excluding the larger swath of affordable housing units found in every community across Florida. I’m speaking of the majority of Florida’s affordable housing which was privately developed, operates without subsidy – although frequently serves families with “Section 8” housing choice vouchers - and is referred to as Naturally Occurring Affordable Housing (NOAH). These Class B and Class C multifamily rental properties (sometimes dating back to the 1920’s, but generally built between 1940 to 1990) provide housing at rates affordable to low- and moderate-income households. The demand for NOAH is strong in a housing market with record low vacancy rates. With ever-growing demand for rental housing, many NOAH properties are now under threat of conversion to market-rate units. This puts many Florida families and communities at risk for displacement.

Surely Florida Housing will recognize that NOAH housing will require a public commitment for preservation, and that an investment to preserve these units will be necessary. If this RFA cannot be expanded to undertake this scope of work, I encourage a separate and distinct RFA be developed to address this need.

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