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Sent: Wednesday, June 9, 2021 5:32 PM

To: Jean Salmonsens <Jean.Salmonsens@floridahousing.org>

Cc: Gladys Cook <cook@flhousing.org>

Subject: RFA 2021-202: Housing Credit Financing for Affordable Housing Developments Located in Broward, Duval, Hillsborough, Orange, Palm Beach and Pinellas Counties - Public Comment

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Dear Mr. Price and Ms. Button,

Neighborhood Renaissance, Inc. is a non-profit affordable housing developer serving Palm Beach County since 1992. We received a PPL from Florida Housing Finance Corp. (FHFC) to develop a mixed-use scattered site development in the underserved West Palm Beach Coleman Park neighborhood with the goal of providing affordable rental housing and the redevelopment of long-standing vacant lots. Infill redevelopment along this neighborhood corridor would also provide affordable commercial space for minority owned small businesses.

Due to the corridor's shallow lots that abut residential single-family zoning, infill redevelopment is limited to low density, garden style buildings. The increase in the minimum project size to 75 units prohibits redevelopment of Coleman Park's corridor and many similar urban neighborhoods as well as the development of "Missing Middle" affordable housing opportunities. Therefore, we recommend a reduction of the minimum project size from the proposed 75 units back to the minimum 30-unit project size that was in effect for RFA 2020-202. Alternatively, FHFC could issue a Housing Credit RFA specifically addressing the need for infill redevelopment and "Missing Middle" affordable housing projects, which are difficult to develop and usually undertaken by mission driven nonprofit housing developers. Because there is limited funding, along with a dwindling land supply and high construction costs, tax credits are needed now more than ever to create affordable rental homes through urban infill redevelopment and by creating "Missing Middle" affordable housing opportunities.

In addition, we recommend there be a tiered minimum LGAO designated funding amount that better reflects the variance between municipal and county governments' funding ability. Most municipalities are at a disadvantage as compared to large Counties who are able to meet the \$640,000 amount; yet, they often provide infill redevelopment opportunities for affordable housing that are nearest to jobs, transportation and essential services.

Respectfully,

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