

June 22, 2023

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

Subject: Comment to RFAs

Dear Ms. Button

I appreciate the opportunity to comment on the upcoming RFA cycle.

In the past FHFC has limited the submission of applications, in a single application process, by requiring that an applicant be limited to submissions that do not duplicate a demographic in a phased development. While it is understood how this is meant to be restrictive, to those developers who are trying to get a double bite at the apple, this can be still be accomplished by submitting 2 applications but with different demographics i.e. one family and one elderly. Developers will follow this prescribed allowance, regardless of the actual demographic need in the area, to allow themselves to double their chances of getting funded. This was also put in place to keep a developer from over committing to a particular demographic in the same area for lease up and marketing.

While the intent is understood it is not beneficial to a large site redevelopment or a revitalization plan which takes into account the housing demographic needs in the community and for which the land owner is committed to a long term plan for the project.

With many PHAs, Cities, Counties and CRAs focusing on redevelopment, masterplanned communities and revitalization projects this limitation will cause these projects to take much longer and possibly fail due to the length of time it takes to get the multiple phases under construction. Other factors such as relocation, when redevelopment is a consideration, may further hinder the process as a newly constructed development on a redevelopment site could be for a different demographic than the old units which would not benefit the current residents as they may not be family size or age eligible for relocating into the new units.

This request is to consider lifting this limitation for master planned multiphase projects that fall under a master planned revitalization/redevelopment category. If this cannot be accomplished in the RFA process then this request is for a modification to Rule 67-48.004 (1). This modification should be beneficial to the Live Local Act funding that is forthcoming.

67-48.004 Selection Procedures for Developments. (1) SAIL, HOME and Housing Credit Applications shall be limited to one submission per subject property. Two or more Applications, submitted in the same competitive solicitation process, that have the same demographic commitment and one or more of the same Financial Beneficiaries, will be considered submissions for the same Development site if any of the following is true: (a) Any part of any of the property sites is contiguous with any part of any of the other property sites, or (b) Any of the property sites are divided by a street or easement, or (c) It is readily apparent from the Applications, proximity, chain of title, or other information available to the Corporation that the properties are part of a common or related scheme of development. If two or more

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Applications are considered to be submissions for the same Development site, the Corporation will reject all such Applications.

We request that, in reference to Rule Chapter 67-48.004 (1) above, Master Planned Redevelopment projects may be treated differently in allowing for multiple applications of the same demographic commitment (i.e. "Family" or "Elderly") to be considered for FHFC ("Florida Housing Finance Corporation") RFA's ("Request For Application") in the same cycle, which could allow Multi-Phase Planned Community developments to secure funding for multiple phases within the same year, the same RFA and/or the same demographic thus greatly improving the efficiency of progressing towards the completion of such endeavors.

With the priority cap limitation and goals still in place we don't expect this change to have a large impact on the process.

We appreciate FHFC's consideration of this comment for the upcoming RFA process and future years.

Sincerely,

A handwritten signature in blue ink that reads "Jane Dixon".

Jane Dixon, Senior Associate

TAG Associates Inc.

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