



**THE HOUSING AUTHORITY**  
OF THE CITY OF FORT MYERS, FLORIDA

November 6, 2023

Florida Housing Finance Corporation  
Attn: Jean Salmonsens  
227 North Bronough Street, Suite 5000  
Tallahassee, FL 32301

RE: RFA 2023-213 SAIL Funding for Live Local Mixed Income, Mixed-Use, and Urban Infill Developments

Dear Ms. Salmonsens,

The Housing Authority of Fort Myers (HACFM) appreciates the opportunity to provide comments on the draft RFA for SAIL Funding for Live Local Mixed Income, Mixed-Use, and Urban Infill Developments (RFA #2023-213 SAIL).

**Developer Experience**

Income averaging, while a concept that has been around for several years, only recently received formal IRS guidance. Prior to this guidance, many housing finance agencies were reluctant to accept it. We request that FHFC reduce this requirement to one development with income averaging that is placed in service.

**Corporation Set-Aside Requirements**

The Greater Dunbar/Southward Village redevelopment in Fort Myers is a HUD CHOICE Neighborhoods Initiative (CNI) project. The Choice program encourages and awards points to developments that serve a broad range of incomes as needed to improve the housing market dynamics in the neighborhood. In order to achieve the required income diversity, HUD requires that the project serve families with a range of incomes from very low income (former PHA families) up to market rate (unrestricted). We strongly support the requirement of the Live Local Act to support "middle" families. We request that FHFC increase the ceiling for market rate units to 35 or 40% or completely remove the ceiling.

"If the above, then allow for at least 40% of the total units but not more than 70% of the total units, rounded up to the next whole unit, must be set aside at or below 60% of the AMI or 80% of the AMI, if income averaging."



### **Market Study Turnaround**

Typically we are not able to receive a market study back within 21 calendar days. We ask FHFC to consider extending this timeline to at least 30 calendar days.

### **Mixed Use Development Qualifications**

We appreciate the encouragement of mixed-use developments. We request that the required letter of intent with the commercial entity be non-legally binding.

Lastly, we are grateful to FHFC for including the HUD Choice Neighborhood under the Urban Infill definition in the draft RFA 2023-213. If selected, this will have a tremendous impact on the Southward Village redevelopment and change residents' lives forever. Our sincere thanks for your support and the opportunity to provide comments. If there are any questions, please do not hesitate to contact me at 239-344-3221 or [marcia@hacfm.org](mailto:marcia@hacfm.org).

Sincerely,



Marcia Davis  
Executive Director

