

March 28, 2023

City of Palms

Ms. Marisa Button Florida Housing Finance Corporation 227 North Bronough Street, Suite 5000 Tallahassee, FL 32301

Comments for RFA 2023-304 RRLP Financing To Be Used For Rental Developments In RE: Hurricane Ian And Hurricane Nicole Impacted Counties

Dear Ms. Button.

The Housing Authority of the City of Fort Myers (HACFM) appreciates the opportunity to provide comments on the Rental Recovery Loan Program (RRLP) sponsored by the Florida Housing Finance Corporation (FHFC) for hurricane-impacted areas.

While the need for sustainable new, affordable, and mixed-income housing has always been great, that need has intensified with the 2022 hurricane events. HACFM owns and maintains property in Lee County, a "priority one" county by FHFC; one of the hardest hit areas by Hurricane Ian and was subsequently impacted by Hurricane Nicole with heavy rainfall and strong winds. Due to the barely habitable conditions created by hurricane Ian, there is now an even greater urgency to demolish and redevelop the pre-hurricane physically distressed Southward Village public housing site within the Edison Ave/Dunbar neighborhood. That property is targeted for demolition and redevelopment in a HUD Choice Neighborhoods Initiatives- (CNI) Grant Program which has a time frame for production. The CNI funds leverage other local, state, and federal resources in an effort to fully fund the Southward Village redevelopment plan. The overall CNI plan will have a final increase in affordable housing by 266 units. Thus, keeping with the overall intent of the RRLP program by producing affordable housing.

The leveraging of FHFC funds be them State or federal has always been a priority for both FHFC and the Legislature. With this in mind, we are requesting that you consider other ways in which to accomplish this.

Option #1 - Consider establishing a goal to fund at least one Public Housing Authority-related project where the PHA or its instrumentality is able to demonstrate "a self-sourced financed" like option. The PHA or its instrumentality would be required to confirm self-sourced permanent





Page 2

financing in an amount that is at least half of the Applicant's eligible RRLP Loan Request Amount or \$1,000,000, whichever is greater.

Option #2 - Offer priority points for a Public Housing Authority related project that is able to provide Gap funding through soft or grant like permanent financing. Points could be based on *HACFM FHFC RRLP* the dollar amount. For example, \$1,000,000 is an additional 2 pts, \$3,000,000 or more an additional 3 points or on a sliding scale determined by the funds committed at application. For example: the highest funding, per set aside unit, would garner the highest points and then it would move downward.

In the event that Options #1 or #2 are not possible to implement into the RFA, please consider this final Option #3: Establish a goal to fund at least one Public Housing Authority-related project. A qualifying PHA may only choose one application to compete for this goal but will still qualify to compete in the regular pool of applications.

For the HACFM all of the above options provide better leveraging of state and federal funds as HACFM will have additional funds to contribute to their applications.

My sincere thanks in allowing me to provide comments for RFA 2023-304 RRLP.

If there are any questions, please do not hesitate to contact me at (239)-344-3221 or marcia@hacfm.org.

Sincerely,

Marcia Davis

**Executive Director** 

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