



June 29, 2023

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

Re: SAIL Financing for Innovative Multifamily Development Opportunities Pursuant to the Live Local Act – Section 420.50871, F.S.

Dear Ms. Salmonsens,

Related Urban appreciates the opportunity to provide public comment on the upcoming RFA for SAIL Financing for Innovative Multifamily Development Opportunities Pursuant to the Live Local Act – Section 420.50871, F.S. In particular, we would like to comment on the Developer Experience qualifications.

In the Conceptual Workshop on June 20, 2023, it was noted that developer experience requirements are expected to be similar to RFA 2023-205 for SAIL Family/Elderly.

Historically, FHFC has not had any funding available for units between 80% and 120% of AMI, other than in Monroe County. The main focus of the Live Local Act is the “Missing Middle” 80% to 120% of AMI units.

The State Legislature has allocated \$150 million for this initiative, which is unprecedented, and it is imperative that FHFC selects and awards these funds to developers with the necessary qualifications and capital to start and complete construction expeditiously.

Mixed-income projects will require a different financing structure than the LIHTC projects that FHFC has traditionally financed including significant developer cash equity and liquidity requirements to address lender and investor underwriting thresholds.

Therefore, FHFC should consider creating bonus point criteria in the upcoming RFA that awards developers with experience developing true mixed-income projects, specifically, projects with a mix of LIHTC units below 80% of AMI, as well as non-LIHTC units within the same project.

Below are our proposed suggestions:

(3) Developer Experience

(a) Required Developer Experience

Can remain the same as other FHFC RFAs.

(b) Bonus Developer Experience with Mixed-Income Tax-Exempt Bond Funded Developments (5 points)

(i) In an effort to encourage the submission of quality Applications, the Corporation will award five points in this RFA if the following apply:

A natural person Principal of at least one experienced Developer entity, which must be disclosed as a Principal of the Developer on the Principals of the Applicant and Developer(s) Disclosure Form, Rev. 05-2019, ("Principal Disclosure Form"), must have, since January 1, 2018, completed at least one tax-exempt bond financed multifamily rental housing development that consists of no less than 70 non-LIHTC units within the completed Development.

The individual meeting the Developer Experience requirements must be disclosed as a Principal of the Developer on the Principal Disclosure Form and must remain with the Development until the release of the operating deficit guarantee set forth in subsection 67-48.0072(18), F.A.C.

For purposes of this provision, completed development means (i) that the temporary or final certificate of occupancy has been issued for at least one unit in one of the residential apartment buildings within the development, or (ii) that at least one IRS Form 8609 has been issued for one of the residential apartment buildings within the development. As used in this section, a Housing Credit development that contains multiple buildings is a single development regardless of the number of buildings within the development for which an IRS Form 8609 has been issued.

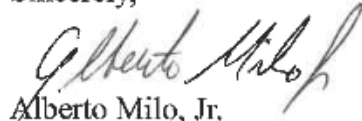
If the experience of a natural person Principal for a Developer entity listed in this Application was acquired from a previous affordable housing Developer entity, the natural person Principal must have also been a Principal of that previous Developer entity as the term Principal was defined by the Corporation at that time.

Bonus Developer Experience with Mixed-Income Tax-Exempt Bond Funded Developments Prior Experience Chart

Complete the bonus developer experience chart for each natural person Principal intending to meet the bonus Developer experience reflecting the information for the one completed tax-exempt bond financed multifamily rental housing development that consists of no less than 70 non-LIHTC units within the completed Development.

Related Urban greatly appreciates your consideration and we look forward to future workshops.

Sincerely,



Alberto Milo, Jr.

President,

Related Urban Development Group