



April 17, 2024

Florida Housing Finance Corporation
C/o Lisa Nickerson
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

Dear Ms. Nickerson,

I am writing to propose an adjustment to the Request for Applications (RFA) 2024-202 concerning Housing Credit Financing For Affordable Housing Developments Located In Broward, Duval, Hillsborough, Orange, Palm Beach, and Pinellas Counties. Specifically, this proposal seeks to implement a revision to the language in the FHFC verification form titled "Verification That Development Is Part of A Local Revitalization Plan." We are requesting that the addition of the phrase "if applicable" be included to the section requiring assurances for "replacement housing for the relocation of persons temporarily or permanently displaced from housing facilities within the planning area."

The current wording of this requirement may inadvertently imply that all developments, including those involving new construction on previously undeveloped or unoccupied land, must provide replacement housing. This stipulation is generally relevant only for projects involving the acquisition and rehabilitation of existing occupied developments. The proposed amendment will clarify that the requirement for replacement housing applies only where displacement occurs, thus not imposing unnecessary burdens on new construction projects that do not involve displacement. The revision ensures that the requirements imposed by the verification form are directly relevant to the nature of the development, enhancing the efficiency and efficacy of policy enforcement. Ultimately, this revision will refrain from necessitating applicants to demonstrate unit replacement, which requirement would prevent disadvantaged communities from receiving much needed additional housing units.

We believe that this minor, yet impactful language adjustment will make the verification form more adaptable and applicable to a wider range of affordable housing projects. We appreciate FHFC's commitment to facilitating affordable housing development and look forward to your consideration in implementing this prudent revision.

Sincerely,

A handwritten signature in black ink, appearing to read "Oscar Sol". The signature is fluid and cursive, with a large initial "O" and a long, sweeping tail.

Oscar Sol
Principal
Green Mills Group

**FLORIDA HOUSING FINANCE CORPORATION
LOCAL GOVERNMENT VERIFICATION THAT DEVELOPMENT IS PART
OF A LOCAL REVITALIZATION PLAN**

Name of Development: _____

Development Location: _____
(At a minimum, provide the address number, street name and city, and/or provide the street name, closest designated intersection and either the city (if located within a city) or county (if located in the unincorporated area of the county). If the Development consists of Scattered Sites, the Development Location stated above must reflect the Scattered Site where the Development Location Point is located.)

The above referenced Development is within the legal boundaries of a local revitalization plan, adopted on _____ by the appointed or elected body of the general local government with the authority to regulate the use of the subject site, or an instrumentality thereof (e.g., City, County, Community Redevelopment Agency). Such plans may be in the form of a community redevelopment plan, as outlined in Section 163.362, F.S., or another type of neighborhood plan formally adopted by one of the entities above or adopted into a larger local planning framework, but that at a minimum provides the following standards:

- Contains a written description of streets and/or established landmarks, or a legal description of the boundaries of the local revitalization area and the reasons for establishing such boundaries shown in the plan.
- Shows by diagram or in general terms the street layouts; proposed use of buildings; the approximate number of dwelling units; and property intended for use as public parks, recreation areas, streets, public utilities and public improvements of any nature.
- Includes public and private sector (other than the Applicant) investment and/or involvement in the designated area.
- Contains safeguards that the work of revitalization will be carried out pursuant to the plan.
- Provide assurances that there will be replacement housing for the relocation of persons temporarily or permanently displaced from housing facilities within the planning area.
- Describes actions taken by the below local government that have or will lead to broader economic investment in the area.
- Describes the public involvement process leading to the adoption of the final plan.

Begin bullet point with "if applicable,"

CERTIFICATION

I certify that the foregoing information is true and correct.

Signature

Print or Type Name

Name of Local Government

Print or Type Title

Name of Plan/Initiative

Date this form was signed

This certification must be signed by the chief appointed official (staff) responsible for such approvals, Mayor, City Manager, County Manager/Administrator/Coordinator, Chairperson of the City Council/Commission or Chairperson of the Board of County Commissioners. Other signatories are not acceptable.