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AFFORDABLE GROUP

March 27, 2024

Melissa Levy
Director of Multifamily Housing
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

Dear Ms. Levy,

I am writing to provide comments regarding RFA 2014-214 Live Local SAIL Financing to be used for Developing and Reconstructing Affordable Multifamily Housing Developments.

Based on the workshop that occurred March 20, 2024, FHFC will now allow sites to be bifurcated and used for both the New Development and the Reconstructed Development as long as the New Development site is not located on a portion of the site that has residential units. Revisions also allow the demolition of existing buildings on the New Development site providing the buildings do not have residential units (occupied or non-occupied).

As Florida Housing is aware, PHAs in Florida have been working towards phasing out of the public housing program. Many of these repositioning plans include a change in subsidy platform from Section 9 (public housing) to Section 8 (housing choice vouchers). Often these old public housing developments are situated on large parcels (20+ acres) of land that is being underutilized. These older properties are confirmed as obsolete by a third-party Physical Needs Assessment and receive HUD approval for demolition via the HUD Section 18 Demolition & Disposition Application (DD APP) process. Through a Disposition the removal of the Declaration of Trust ensues which results in the units being removed from the public housing Annual Contributions Contract and allowing for the property to be utilized for another purpose. HUD Tenant Protection Vouchers (TPVs) are issued to families to allow for relocation due to the demolition and/or disposition of the existing units. The Section 18 process also allows for other funding programs to be used for the redevelopment of the development site (i.e. conventional mortgage financing, FHFC loan programs, LIHTC and Section 8).

Due to the large size of these properties both the New Development and the Reconstructed Development can be developed on a repositioned project site.

We ask that Florida Housing consider allowing current large PHA Public Housing repositioning sites, that currently include residential buildings on the proposed new development site, and that have submitted a DD APP with HUD, prior to the RFA 2024-214 application deadline be eligible for funding under RFA 2024-214.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Rick Crogan
Rick Crogan

Vice President of Development