



Luxury Affordable Housing

June 17, 2024

Via Electronic Mail

Ms. Jean Salmonsens
Multifamily Allocations Director
Housing Finance Corporation
227 N. Bronough Street, Suite 500
Tallahassee, Florida 32301-1329
Jean.Salmonsens@floridahousing.org

Re: Public Comment regarding RFA 2024-216; Live Local SAIL Financing for Construction of Large-Scale Developments of Significant Regional Impact

Dear Ms. Salmonsens:

We would like to thank you for the opportunity to express our concerns on draft RFA 2024-216, Live Local SAIL Financing for Construction of Large-Scale Developments of Significant Regional Impact. We would like to respectfully request that FHFC consider the following items as you finalize the RFA:

- **Submission Deadline:** Given the unique nature of this RFA and the desired evidence of collaboration between the applicant, municipalities, and stakeholders, we believe that the timeframe of 16 days does not allow for preparation of a concise application that truly conveys the impact that a desired project would have on a region. As such, we would like to request that Florida Housing consider a longer period between issuance and due date.
- **Unit Count:** The draft RFA prescribes a minimum of 300 units in the proposed development for applications within Large Counties. While we agree that for a project to have significant regional impact it would need to have ample affordable housing units within the larger development plan, we believe that a single phase having 300 units of affordable units would concentrate the affordable housing within the larger development plan. As such, we would like to request that Florida Housing consider having the proposed development have a smaller unit count requirement and increasing the number of affordable housing units required in the larger development plan.
- **Demographic:** The draft RFA allows for applications designated only to the family demographic. Given the aging Florida population and the decrease of affordability across the state, we believe that there is often an equal need for senior housing as there is family housing. We would request that Florida Housing allow for Senior Housing as well in the RFA.
- **Site Control:** Often in large scale solicitations, developers are awarded sites via a Master Development Agreement. We would like to request that Florida Housing consider allow MDAs to be included in the eligible chain of site control from the municipality to the applicant.
- **Developer:** We would like to request that in the event the principals of the developer are included in the development team that was selected within a competitive process of the municipality that this

qualifies that the developer was selected during a competitive process and that the master developer need not go through an additional solicitation.

- **Civic Entity:** The RFA determines the Civic Entity must relate to administrative function. We believe that this is quite limiting as the administrative functions would often be serving internal operations rather than serving and impacting the greater community. As such, we would request that Florida Housing widen the lens to include civic/cultural/community facilities (such as library, museum, concert, theater, sports, or entertainment venues). We believe that this will open the RFA to applications that will lead to greater impact in our communities.

We greatly appreciate your consideration on these topics and look forward to working with FHFC on this exciting and impactful RFA.

Sincerely,



Rex Cole, Senior Vice President
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