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January 3, 2024

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

Ms. Levy,

Thank you for the opportunity to comment on upcoming funding opportunities with Florida Housing.

**This comment is not specific to an RFA but to the general RFA process and PHA projects.**

This request is to consider allowing PHAs to submit up to two phases for a redevelopment project with the same demographic, on a site which is a multiphase project.

Currently FHFC limits applicants from submitting applications for the same demographic on a parcel that is contiguous. We request that redevelopment multiphase projects be permitted to submit multiphase applications with the same demographic as these phase applications are necessary to complete a project and do not always consist of differing demographic projects.

Having to wait another year to submit for a phase due to its demographic type can greatly delay a project or result in the project never being completed. Typically, the housing in these redevelopment projects is obsolete, but the units remain operational due to a dire lack of housing in the area for the residents with the AMIs that are being offered by the present units. In the current process, which allows for two phases to be submitted with differing demographic types, it is resulting in PHAs submitting for a demographic that may not best serve the present community that is being redeveloped. This can be even more challenging when RAD is being considered as a tool for the PHA to convert the current units to a different subsidy platform.

Starting a redevelopment, which currently has a general family demographic, with a phase that has an elderly demographic can be very difficult. Despite this, we will apply under the elderly demographic because it takes years to get these phased developments finished and we need to initiate the process. Having two chances for funding is better than one even if it's not the phase that is best to begin with. While this happens more with redeveloping a family property it is also applicable when redeveloping an elderly project with multiphases that will include family. This

is the decision that many redevelopment projects must make when applying for competitive funding.

Typically, these redevelopment projects, because they are on larger properties that are underutilized, increase the density, and provide additional units. This results in revitalizing the neighborhood by creating thriving communities that provide housing to families and elderly residents of mixed incomes. While most phased developments will eventually have an elderly component unless the current residents are elderly, the initial choice for a phase would be general population or “Family” for not only relocation purposes but for RAD conversions which prefer no change in the occupancy type and require one for one replacement.

We appreciate the staff’s consideration of our request, and I am available to discuss this in further detail.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jane Dixon', with a long horizontal line extending to the right.

Jane Dixon, Senior Associate  
TAG Associates Inc.