



**GAINESVILLE HOUSING AUTHORITY**  
*Where Housing Matters*

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**EXECUTIVE DIRECTOR**  
PAMELA E. DAVIS

March 5, 2018

Trey Price, Executive Director  
Florida Housing Finance Corporation  
227 N Bronough Street, Suite 5000  
Tallahassee, FL 32301

**Subject: Comments to the QAP / re - HUD's 2018 designated DDA and QCT list and Florida's QAP and the authority to provide the 30% boost.**

Mr. Price:

Gainesville Housing Authority (GHA) has recently begun the major revitalization of one of its largest and oldest public housing developments. We were able to begin this process through a set-aside established by Florida Housing in last year's Competitive Geographic RFA that allowed for a non-QCT/DDA site to obtain SAIL funds to meet the gap financing to make this type of development financially feasible.

We are very grateful to have obtained this set-aside and opportunity to begin the Phase I Redevelopment of our Woodland site. The units in this revitalization effort are nearly 50 years old and in dire need of revitalization. Due to the site size, the revitalization needs to be completed in phases. Phasing also assists in the relocation efforts and provides the residents with options and minimal disruption.

This year with the SADDAs and QCTs being as they are we find ourselves in the same situation for this property. Our Woodland site will not qualify for any financially feasible application as the site is not located in a Tier 2 or Tier 3 Area of Opportunity (AOO) in the City of Gainesville. As FHFC has acknowledged in the past, the location of PHA redevelopment and rehabilitation sites are pre-determined. The sites cannot simply be moved to another street, city or county, and are therefore at the mercy of State and Federal funding guidelines to compete for funding.

Most PHA sites are in QCTs. For the sites that are not in a QCT, a PHA that seeks to redevelop properties should be encouraged to further the deconcentration of poverty by redeveloping its sites for mixed-incomes and replacing or preserving existing stock. The current FHFC process encourages PHAs with multiple properties to only redevelop sites within its area that are in

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QCTs. The policies seem to run contrary to FHFC's and the PHA's mission of not only creating affordable housing but also proportionate distribution across an area.

We come now before you to request that Florida Housing please consider allowing PHA sites to be eligible for the 30% boost through extending FHFC designated Areas of Opportunity (AOO) to encompass PHA sites in non-QCT/DDA areas OR allowing PHAs to get a 30% boost on sites that are not eligible any other way by reflecting this in the QAP as an additional option at Section II.I. in the QAP OR to reestablish the SAIL set-aside for non-QCT/DDA sites as in the previous Medium/Small Geo RFA which allowed for such. We look forward to speaking with you to further explore opportunities to resolve this issue.

Sincerely,



Pamela E. Davis

Executive Director

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