



**Jim Scholl**  
City Manager

## THE CITY OF KEY WEST

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November 8, 2018

Marisa Button, Director of Multifamily Allocations  
Florida Housing Finance Corporation  
227 N. Bronough St. Suite 5000  
Tallahassee, FL 32301

Re: RFA 2019-101 – CDBG-DR Workforce Housing Developments in Monroe County

Dear Ms. Button:

The comments below are offered in response to RFA Workshop of November 2, 2018.

Who can apply

The Applicant Entity is a single purpose legal entity. A “legal entity” means either a legally formed corporation, limited partnership or limited liability company with a management and ownership structure.

With regard to the CDBG-DR land acquisition and construction of affordable workforce housing funding and the prioritization of applications with ownership structures that include a Local Government, PHA or a Land Authority holding 100% ownership in the development as affordable housing in perpetuity, we believe that the existing legal formation of said entity (Local Government, PHA, or Land Authority) is sufficient for the purpose of this funding application. While we understand that traditionally in Low Income Housing Tax Credits projects, the formation of a new entity is required; we do not believe such a requirement is needed for this program if no tax credit funding will be used. To impose a new legal entity formation will cause the Local Government, in this case the City of Key West, PHA or Land Authority to incur unnecessary costs in legal fees as well as prove burdensome to manage the affairs of a new entity. This is especially burdensome for the City of Key West due to our Charter provision prohibiting the sale or long-term lease of City property without a public referendum.

It is respectfully requested that consideration be given to removing this additional requirement where not needed.

Sincerely,

A handwritten signature in blue ink that reads "jscholl".

James K. Scholl  
City Manager, Key West

*Key to the Caribbean – Average yearly temperature 77° F.*