

**Questions and Answers for RFA 2019-101
Community Development Block Grant-Disaster Recovery (CDBG-DR) in Monroe County**

Question 1:

Please note that each of the Florida Housing Ability to Proceed Verification forms (Form Rev. 08-18), includes the following language under “Development Location: “The Location of all Scattered Sites, if applicable, must also be included.” Please assume an application with the following facts:

1. There are two Scattered Sites (“Site A” and “Site B”).
2. Site A is in “Municipality X” and Site B is in “Municipality Y.”

For certain Ability to Proceed Verification forms, the governmental authority having jurisdiction over the same specific form is different (e.g., the Zoning form), as a consequence of having two Scattered Sites in different municipalities. Must all Scattered Sites be listed on each individual form, or is it permissible to have two separate forms (e.g., two separate Zoning forms) with: 1. one form indicating Site A only, and executed by an appropriate party from Municipality X, and 2. a separate form indicating Site B only, and executed by an appropriate party from Municipality Y?

Answer:

It is permissible to provide multiple copies of Ability to Proceed forms to demonstrate infrastructure and zoning for Developments consisting of Scattered Sites.

Question 2:

Please note that some of the Florida Housing Ability to Proceed Verification forms (Form Rev. 08-18), include the following language under “Number of Units in the Development:” “This number must be equal to or greater than the number of units stated by the Applicant in Exhibit A of the RFA.” For applications with Scattered Sites (especially Scattered Sites within different municipalities) the official that is required to sign a particular form may only be able to opine as to one Scattered Site at a time. For example, a Zoning form may be needed to opine as to the number of units on Site A, in Municipality X, with a separate Zoning form needed to opine as to the number of units on Site B, in Municipality Y. Considering the foregoing, will it be permissible for the sum of the number of units stated in multiple forms of the same type (e.g., on two separate Zoning forms) to be equal to or greater than the number of units stated by the Applicant in Exhibit A of the RFA.

Answer:

When the same type of Ability to Proceed form is executed by different jurisdictions in a Scattered Sites Development and each jurisdiction can only opine as to the number of units on the portion of the site that is within the jurisdiction, Florida Housing will confirm the total number of units on the form(s) is equal to or greater than the total number of units committed to by the Applicant in the Application.

Question 3:

Are predevelopment cost such as architecture, engineering and demolishing of existing structures (non-residential structures) allowed to be reimbursable expenses under CDBG-DR RFA 2019-101?

Answer:

Yes; however, Applicants should be aware of all federal regulations regarding predevelopment activity.

Question 4:

Please provide clarification as to whether or not we are to show Compliance Monitoring Fees and Loan Servicing Fees in the Development Cost Proforma. Under c. (5), page 38, it states, "With respect to the loan amount(s), all fees set forth in Exhibit C to the RFA are part of Development Cost and can be included in the Development Cost Pro Forma and paid with loan proceeds." However, on page 68, 3. Fees, 2nd paragraph, it states, "All fees set forth below, **except for Compliance Monitoring Fees and Loan Servicing Fees**, are part of Development Cost and can be included in the Development Cost Pro Forma and paid with loan proceeds."

Answer

As part of the modification issued on July 19, 2019, the language in both places has been changed to "All fees set forth below, except for Loan Servicing Fees, are part of Development Cost and can be included in the Development Cost Pro Forma and paid with loan proceeds."

Question 5:

Page 33 of the RFA states that capital contributions will not be considered a source of financing.

In the event an Applicant is securing private equity investments for the application, either from internal sources or from a third party, how should Applicant document this?

Answer:

Section Four, A.10.b. of the RFA provides the requirements for all Non-Corporation Funding Proposals and the documentation required.

Question 6:

The proposal fails to provide a definition of "Scattered Site." Though this applicant is knowledgeable of such definition typically in use by FHFC, RFA 2019-101 does not state a Scattered Site definition in its body nor refer to an existing rule that otherwise defines the term. Rule Chapters 67-53, F.A.C. and 67-60, F.A.C. cited do not include the term. Rule 67-48 is cited only to denote Developer Fee. Please clarify the term.

Answer:

“Scattered Sites” as applied to a single Development, means a Development site that, when taken as a whole, is comprised of real property that is not contiguous (each such non-contiguous site within a Scattered Site Development, is considered to be a “Scattered Site”). For purposes of this definition “contiguous” means touching at a point or along a boundary. Real property is contiguous if the only intervening real property interest is an easement, provided the easement is not a roadway or street. All of the Scattered Sites must be located in the same county.

This definition of Scattered Sites will be reflected in the Second Modification for 2019-101 which will be posted on Monday, July 29, 2019.

Question 7:

For scattered site developments, the appraisals for all the sites could be several hundred pages long. In Section 4 of the RFA instructions under 7.a. (Site Control) and under 11.c. (Uniform Relocation Act Acquisition Information), the same copies of the appraisal(s) are required. If the appraisals are included in Attachment 6 as part of the Site Control documentation, do they need to be included again in Attachment 18? Can we just insert a page in Attachment 18 that references Attachment 6?

Answer:

It is permissible to provide documentation under one Attachment and then reference the documentation under a separate Attachment.

Question 8:

In Section 4 of RFA instructions under 11.b., it asks for a list of all occupied units and tenant income certification to be provided in Attachment 13. Will this information be redacted before the application is posted on FHFC’s website?

Answer:

Yes

Question 9:

Section 2 of the RFA states “The Demographic Commitment must be Workforce households at or below 80% of the Area Median Income, serving general occupancy.” In past years this section has been called “family demographic commitment,” and now the word “family” has been removed. Can we submit developments that are either family or senior, as they both are “general” occupancy?

Answer:

All developments funded in this RFA will serve the same demographic commitment - Workforce households at or below 80% of the Area Median Income, serving general occupancy. No properties funded under this RFA may be age restricted.

Please Note: The Q&A process for RFA 2019-101 is concluded and Florida Housing does not expect to issue any further Q&As regarding RFA 2019-101.

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