



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

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**EXECUTIVE DIRECTOR**  
PAMELA E. DAVIS

January 22, 2019

Harold (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 2019 designated DDA and QCT list and Florida's QAP and the authority to provide the 30% boost.

Mr. Price:

The 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 because of a set-aside established by Florida Housing, in the 2015 Competitive Medium/Small County Geographic RFA, that allowed for a non-QCT/DDA site to obtain SAIL funds to assist in meeting the gap financing needed and to make this type of development financially feasible. We are very grateful to have had this set-aside and opportunity to begin the Phase I Redevelopment of our Woodland site. The GHA units in this revitalization effort are in the 50 year age range and are in dire need of revitalization. As the site is so large the revitalization needs to be accomplished in phases. Phasing also assists in the relocation efforts and provides the residents with options and minimal disruption. Typically with a phased property the future phases have the opportunity to keep a DDA/QCT designation if for some reason the future development is no longer located in a boost area. Since this site did not have a DDA/QCT boost it cannot take advantage of this option and the site is again unable to get the boost for future phases. This makes the completion of the redevelopment unforeseeable which renders the overall property a combination of old barracks style units side by side with new housing. The GHA's other properties are now located in boost areas but Woodland continues to not have changed. If we could have foreseen the future we may have chosen another site to begin with as all of the GHA sites did not get the boost when the planning began for revitalizing the GHA properties.

This year, with the DDAs, SADDAs and QCTS being as they are, we find ourselves again in the same situation for the phase II of this property. We are also not located in one of the Gainesville Areas of Opportunity (AOO) which will again put our Woodland site out of the running for a financially feasible application. As such we have not applied since 2015. As FHFC has acknowledged in the past, the location of PHA redevelopment and rehabilitation

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sites are pre-determined. PHAs cannot simply be moved to another street, city or county, and are therefore at the mercy of State and Federal funding guidelines to be able to compete for funding.

Most PHA sites are in QCT's. For the few sites that aren't, a PHA that seeks to redevelop these properties should be encouraged to further the deconcentrating of poverty by redeveloping it's sites for mixed-incomes and replacing or preserving existing stock. The current FHFC process encourages PHA's with multiple properties to only redevelop sites within its area that are in QCT's which seems to run contrary to FHFC and the PHA's mission of not only creating affordable housing but also proportionate distribution across an area.

As we begin a new year and look towards rule development and updating the QAP the GHA requests that Florida Housing please consider allowing PHA sites to be eligible for the 30% boost through some options such as:

1. extending FHFC designated Areas of Opportunity (AOO) to encompass PHA sites in non-QCT/DDA areas or are located in Opportunity Zones as nominated by DEO/Governor's office last year and subsequently approved by Treasury as areas in need of redevelopment

OR

2. 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. of the QAP

OR

3. to reestablish the SAIL set-aside for non-QCT/DDA sites as in the 2015 Medium/Small Geo RFA which allowed for such.

Also – additional SAIL could be offered to Bond/SAIL deals in which PHAs do not get the boost which could provide an additional source for redevelopment/revitalization.

Sincerely,



Pamela Davis, Executive Director

Cc: Marisa Button  
Kevin Tatreau  
FAHRO

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