



March 26, 2019

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 for 9% projects.

Dear Mr. Price:

The Florida Association of Housing and Redevelopment Officials (FAHRO) appreciates the ability to comment on the upcoming application process. FAHRO represents housing authorities within the state of Florida.

Item 1: Eligible Basis boosts / QCT; SADD; DDA

Florida Housing has acknowledged in the past that the location of public housing authority (PHA)-owned sites are pre-determined. PHA sites cannot be moved to another location and are therefore at a loss if the sites do not fall into a 30% boost area.

While most PHA sites are in QCT's, some are not and for those that aren't, and that don't meet any other boost criteria, a PHA seeking to compete for funding with its own land/properties ought to be able to compete like other developers compete by having options that increase the feasibility of a development. Most PHAs in this position do not apply because they can't make the deals work without the additional basis boost.

As Florida Housing begins the 2019 rule development and updating of the QAP, FAHRO requests that Florida Housing consider allowing PHA sites to be eligible for the 30% boost through some options available to them such as:

1. Extending FHFC designated Areas of Opportunity (AOO) to encompass PHA sites in non-QCT/DDA areas

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

AND

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

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/new construction on PHA/DOT sites and provide an additional source of gap financing for RAD conversions.

Item 2: PHAs in Small Counties

PHAs located in small counties other than Monroe do not have feasible funding opportunities in the FHFC funding process.

Small counties have few options in the current application process. Since housing credits are currently being funneled to Monroe County and do not have another option for the small county PHAs other than bonds with SAIL which do not work because of the remaining gap.

We recently heard that FHFC will be reestablishing the small county allocation for the competitive 9% credits and we support this.

Sincerely,



Debbie Johnson, President

cc: Kim Barclay, FAHRO Executive Director
Marisa Button, Florida Housing Finance Corporation