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April 11, 2019

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

RE: 2018/2019 RFA Public Comments

Dear Ms. Button,

The Housing Authority of the City of Lakeland, Florida appreciates this opportunity to submit comments for 9% LIHTC RFA for Medium and Small Counties and SAIL.

Create new PHA Leverage Factor

We respectfully request for a leveraging multiplier to be added for Public Housing Authority ("PHA") developments. PHA developments are more expensive than non-PHA developments, because of Davis Bacon wages and several other costly compliance items. Non-PHA developments have an unfair competitive advantage, because most PHA developments could unjustly fall into Leverage Group B and therefore lose all possibilities of getting funded.

The RFA drafts available are only providing for an Add-On to the TDC cap for PHA developments. A leverage factor is necessary, for the same reason that the TDC Add-On is necessary. We propose the PHA leverage factor to be 0.825.

Change the PHA preference

As per the 04/02/19 RFA workshop, FHFC is looking into creating a funding preference in the 9% Small/Medium RFA, which would basically be a goal to fund a PHA Development in a Non-QCT / Non-SADDA. As stated in other Public Comments, not many PHA sites are not within QCTs, which would create an unfair advantage to those few.

What we suggest I believe would satisfy the majority of the PHAs:

1. In the QAP, add a 30% tax basis boost for revitalization sites of PHAs that are subsequent phases.

2. In the 9% Small/Medium RFA, change the PHA preference to be for PHA Developments that are subsequent phases. Besides that, the PHA preference can also have the requirement of a special contribution or a Local Government Area of Opportunity funding.
3. In the SAIL RFA, allow for PHA Developments in Medium Counties that are not in QCTs or SADDAs or that are subsequent phases to be able to request an amount above the Maximum Request amount allowed for the other non-PHA Developments.

This is in line with what other Housing Authorities has expressed they need to complete all their initiated revitalization efforts.

Respectfully submitted,



Benjamin Stevenson
Executive Director