

April 3, 2019

Trey Price, Executive Director  
Florida Housing Finance Corporation  
227 N Bronough Street, Suite 5000  
Tallahassee, FL 32301

Subject: Comments upcoming RFAs / 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 Lake Wales Housing Authority appreciates the ability to comment on the upcoming application process.

**Item 1: Eligible Basis boosts / QCT; SADDA; 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 such as our self, 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.

In response to the most recent Workshop for the 2019-2020 RFA process the Lake Wales Housing Authority would like to extend its support of the decision to implement a goal of funding 1 Application that qualifies as a Public Housing Authority Area of Opportunity Application and is not located in a Qualified Census Tract (QCT) or a Small Area Difficult Development Area (SADDA). It's our understanding that deals that qualify for the goal but are



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not funded under the goal will still qualify for the boost. We fully support this as it will provide PHAs such as ours to put together a financially feasible Application for funding. I also support additional ways to create opportunities for PHAs and others to turnaround old obsolete housing developments into new beautiful housing opportunities and to enable revitalization within the cities and counties which we serve for the betterment of the communities and the residents.

Item 2: 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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Albert Kirkland, Jr.", with a long horizontal flourish extending to the right.

Albert Kirkland, Jr.  
Executive Director