



**The Housing Authority**  
OF THE CITY OF  
NEW SMYRNA BEACH, FLORIDA 32168

TERESA POPE  
EXECUTIVE DIRECTOR  
[www.newsmyrnahousing.com](http://www.newsmyrnahousing.com)

1101 SOUTH DIXIE FREEWAY  
TEL. 386/428-8171  
TTY/TDD: 711 (via the Florida Relay Service)  
FAX: 386-427-3429

April 5, 2019

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

Subject: Comments on upcoming RFAs/regarding HUD's 2019 QCTs and DDAs, FHFC's QAP and the authority to provide the 30% boost for 9% projects

Dear Mr. Price:

The Housing Authority of the City of New Smyrna Beach (NSBHA) appreciates the ability to comment on the upcoming application process.

**Comment 1: Public Housing Authority Area of Opportunity Funding Goal and Basis Boost**

In the past, Florida Housing has acknowledged that the location of Public Housing Authority (PHA)-owned sites is pre-determined. PHA-owned sites cannot be moved to a better-suited or more advantageous site and are therefore at a loss if the site is not within a designated 30% boost area (such as a HUD-designated Qualified Census Tract (QCT) or Small Area Difficult Development Area (SADDA)).

While most PHA-owned sites are located in a QCT or SADDA, those that are not are at a serious disadvantage. PHAs, such as NSBHA, with sites that are not located in a 30% boost area are not able to compete on the same field as other developers due to the fact that the sites' location is pre-determined. PHAs ought to have a similar opportunity to increase a development's feasibility by seeking a basis boost option. Most PHAs with sites not in a boost area simply do not apply for funding because the projects are not financially feasible without the additional basis boost.

In response to the most recent Workshop for the 2019-2020 RFA process, I would like to extend my support of FHFC's decision to implement a goal of funding one application that qualifies as a Public Housing Authority Area of Opportunity Application and is not located in a QCT or a SADDA. It is my understanding that projects that qualify for the

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goal but are not funded under the goal will still qualify for the basis boost. I fully support this as it will provide PHAs such as ours to put together a financially feasible Application for funding.

I also support additional methods of creating opportunities for PHAs and others to revitalize tired and obsolete housing developments into new beautiful housing opportunities and to enable redevelopment within the cities and counties which we serve for the betterment of the communities and the residents.

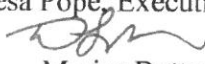
**Comment 2: Additional SAIL Funds for PHA/Declaration of Trust Sites**

I respectfully request that FHFC consider making additional SAIL funds available to PHA/Declaration of Trust (DOT) sites funded with tax-exempt bonds and SAIL that are not located in a QCT or SADDA and therefore not eligible for the basis boost. The additional SAIL would effectively provide a source for redevelopment/revitalization/new construction on PHA/DOT sites and provide an additional source of gap financing for RAD conversions.

I appreciate your time and consideration. Please do not hesitate to contact me if you have any questions regarding my comments above.

Sincerely,

Teresa Pope, Executive Director

  
Cc: Marisa Button, FHFC