

May 23, 2020

Trey Price, Executive Director
Marisa Button, Director of Multifamily Programs Florida Housing Finance Corporation
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Re: Comments to 2020/2021 RFA Cycle

Thank you for the opportunity to submit our comments regarding the proposed changes to the 2020-2021 RFA Funding Cycle. We appreciate your consideration regarding the following matters:

Site Plan Approval

The re-introduction of preference for developments with site plan approval will eliminate many sites in areas needing affordable homes by significantly increasing the cost of getting a site positioned to make an application for funding. Site plan requirements vary greatly among jurisdictions, many of which require complete architectural, drainage and landscaping plans - a significant investment for any developer, particularly for nonprofit housing developers. Certified by a designated official of the governing jurisdiction, the 2019 cycle Zoning Forms seems sufficient to assure that a proposed development has the ability to receive full approvals and obtain a building permit. In addition, the word “plat” used in the proposed form is too specific since not all developments require a final “plat” to obtain a building permit. In many jurisdictions, a site plan approval is required.

Deed or Executed Lease with a Local Government

There appears to be no public benefit in connection with the proposed 5-point award for “Applications that include a deed or an executed lease with a Local Government for at least 50 years...” This will only benefit those who already own property or have said ground leases with a Local Government to the detriment of other equally deserving development applications.

Proximity Scoring

We believe that quality affordable homes should be available in all areas that meet the current established proximity requirements. The proposed proximity bonus will eliminate well located sites where affordable homes are in short supply and skew tax credit awards to the few lucky areas that qualify for additional proximity scores. We also concur with other commenters that the proposed scoring plan will drive up land prices for high scoring sites.

SAIL Funding – Minimum five Units per Building Requirement

Many older urban neighborhoods lack quality affordable homes even though there is an inventory of smaller vacant scattered-site lots that are zoned multi-family but cannot accommodate 5+ units. By allowing duplexes, triplexes and quadplexes within a scattered-site SAIL development application the quality of life improves for all residents by transforming neighborhood blight. By redeveloping these lots, the marketability of the SAIL funded development is also improved.

Sincerely,

Terri Murray

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Executive Director