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Mr. Trey Price, Executive Director
Ms. Marisa Button, Director of MF Programs
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

Re: Comments submitted for May 29, 2020 Workshop regarding 2020/2021 RFA Funding Cycle

Thank you so much for providing the opportunity to submit comments about the proposed changes to the 2020-2021 RFA Funding Cycle. The Florida Alliance of Community Development Corporations, Inc. represents over 50 community-based nonprofits serving LMI populations across the state. On behalf of our members and other small developers, we ask that you consider the following issues during this process:

Ability to Proceed: 3.b. Site Plan approval form

Bonus points should not be given to applications that have final 'plat' approval. This proposed change will eliminate many sites in areas that need affordable homes by significantly increasing the cost of getting a site ready to apply 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 our nonprofits. The 2019 cycle Zoning Forms certified by the designated governing jurisdiction should be sufficient to assure that a proposed development can 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 this to obtain a building permit. In many jurisdictions, a site plan approval is required. This could lead to the elimination of many sites in areas that need affordable housing and again, increase the cost of an application

Ability to Proceed: 3.c. Environmental Phase 1 reports

We recommend against giving 5 points to these applications with Phase I (and Phase II) Environmental Forms. This requirement is too costly to nonprofits and smaller developers. One option to eliminate this application cost would be to require the Phase I to be contracted and paid by the applicant within 30 business days **after** staff ranks and recommends developments to the Review Committee. If applicants have can't provide a "clean" Phase I (or Phase II) Environmental Study then FHFC can replace that project with the next ranked application.

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Ability to Proceed: 3.d. 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. **Our members do not support this change.**

11. How the Proposed Proximity would work

We believe that quality affordable homes should be available in **ALL** areas that meet the current established proximity requirements. Requiring a higher score will make some low-income neighborhoods that need affordable housing noncompetitive for funding while skewing tax credit awards to the few lucky areas that qualify for additional proximity scores. **We oppose establishment of the proposed Proximity Level System.**

We also concur with other commenters that the proposed scoring plan will drive up land prices for high scoring sites.

General Comment regarding SAIL Funding

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 that just cannot accommodate 5+ housing units. Allowing duplexes, triplexes and quadplexes within a scattered-site SAIL development application will improve the quality of life for all residents while transforming neighborhood blight. This type of development can improve the marketability of the SAIL funded development. **We ask you to consider removing the minimum five units per building requirement.**

Thank you again for the opportunity to comment. Please contact me at 904-400-2619 or execdir@flacdc.org with any questions.

Sincerely,



Terry Chelikowsky
Executive Director