

From: Mike O'Hara <Mike@hacmb.org>
Sent: Wednesday, July 24, 2019 4:48:56 PM
To: Marisa Button <Marisa.Button@floridahousing.org>
Cc: Miguell Del Campillo <miguell@hacmb.org>
Subject: RFA 2019-103 – Public Comments - July 24, 2019

Dear Ms. Button,

Thank you for allowing the Housing Authority of the City of Miami Beach (HACMB) to provide comments on RFA 2019-103 - Community Development Block Grant-Disaster Recovery (CDBG-DR) for Small Developments in Areas Deemed Hurricane Recovery Priorities.

The following comments are in regards to the 7-19-19 Draft of RFA 2019-103:

Section Four - 3. a. (2) – page 7 of 107:

A Public Housing Authority (PHA) may serve as the Applicant for projects under the Tier 2 classification. The HACMB requests that evidence from U.S. HUD be allowed to satisfy the requirements under this section. The Florida Department of State, Division of Corporations, is unable to provide the required confirmation as a PHA is not a corporation.

Section Four - 3. a. (3) – page 7 of 107:

Section 421.09, Florida Statutes specifically acknowledges that it is the policy of this State that each housing authority shall operate as a not for profit. An IRS determination letter would not be applicable to a PHA.

Section Four - 3. b. (2) – page 8 of 107:

The HACMB requests that evidence from U.S. HUD be allowed to satisfy the requirements under this section. The Florida Department of State, Division of Corporations, is unable to provide the required confirmation as a PHA is not a corporation.

Section Four - 4. c. – page 13 of 107:

Mid-Rise developments were included as allowable development types in the June 13 and July 19 Workshop Agendas, however Mid-Rise is not included in the RFA. Projects developed on small urban infill lots with parking pedestal construction would necessitate a fourth floor with residential units. The HACMB requests that Mid-Rise (4, 5 or 6 stories) developments be included as an allowable development type.

Section Four - 5. e. (3) (b) – page 16 of 107:

The Tier 3 classification under this section should reference State-Designated MIDs. The HUD-Designated MIDs are already included in Tier 2.

Exhibit F – Credit Underwriting Procedures – 1. a. – page 80 of 107:

RFA 2019-103 contains only one demographic commitment (*workforce households at or below 80% of the Area Median Income, serving general occupancy*), therefore, separate applications for developments on contiguous sites are not allowed. Compliance with this section is met in other FHFC RFAs through the selection of different demographic commitments - for example, one project for families, and the other for elderly. The HACMB requests that the contiguous site requirement be removed as the RFA includes only one demographic commitment.

Exhibit F – Credit Underwriting Procedures – 5. e – page 92 of 107:

PHAs are unable to meet the 151 calendar day requirement for submission of audited financial statements. Audited financial statements for PHAs are due 9 months after the PHA's fiscal year end – please see 24 CFR § 902.33 (Financial reporting requirements). The HACMB requests that the deadline for PHA applicants be revised accordingly.

Thank you.

Mike

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