

August 19, 2019

Marisa Button  
Director of Multifamily Allocations  
Florida Housing Finance Corporation  
227 N Bronough, Suite 5000  
Tallahassee, FL 32301

Dear Ms. Button

Thank you for the opportunity to comment on the upcoming RFAs for 2019-2020.

**This comment/request is applicable to RFA 2019-113**

For this RFA FHFC has planned to allow PHAs that do not have the boost to gain it through the competitive process for 9% LIHTC in the 2019-113 Geographic RFA for Small and Medium Counties.

The current agenda for this RFA describes this process as such:

Public Housing Authority Area of Opportunity basis boost:  
Public Housing Authorities that do not otherwise qualify for a QCT or SADDA basis boost may elect to be considered for a state designated basis boost. If such Application is ranked high enough so that it is selected for funding, no other Applications that elect to be considered a Public Housing Authority Area of Opportunity Application would be selected for funding.

In the initial agenda 4-2-19 the FHFC included a goal to fund one such property but then the goal was removed and leaving the language above in place.

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). ▪  
Applications in Small and Medium Counties are eligible for this goal.

2<sup>nd</sup> workshop: At the 4-2-19 workshop, it was proposed that there would be a goal in the Small Medium County Geographic RFA to fund 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).

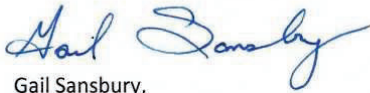
Florida Housing now proposes that, instead of a goal, all Public Housing Authorities that don't otherwise qualify for a QCT or SADDA basis boost, may elect to be considered for a state designated basis boost and qualify as a "Public Housing Authority Area of Opportunity Application". If any such Application is ranked high enough so that it is selected for funding, no other Applications that elect to be considered a Public Housing Authority Area of Opportunity Application would be selected for funding. Florida Housing would select a maximum of one Public Housing Authority Area of Opportunity Application.

This new language is confusing. We don't understand why FHFC would only allow one PHA deal that elected to receive the boost to be funded because it requires the basis boost. With the applications typically getting a basis boost to be feasible this deal would be no different than the others that are requesting funding. We understand that this discretionary boost is a special consideration by FHFC, for PHA sites that don't get the boost automatically, but fail to understand why this would be a limiting factor. You are not giving a PHA that requires a boost any competitive advantage but only the ability to compete in an RFA that it otherwise would not be able to compete in. It will not score any higher or receive any preference over other applications.

We are requesting that FHFC allow any PHAs that are in need of the discretionary boost be allowed to compete as any other site, that would get the boost automatically through a QCT or DDA, or another discretionary boost allowance.

We also ask that the discretionary boost be given only to properties that the PHA holds ownership of.

Sincerely,



Gail Sansbury,  
Executive Director

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