



August 12, 2020

Mr. Trey Price and Ms. Marisa Button
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: New Medium County Revitalization Form

Dear Mr. Price and Ms. Button,

The proposed Revitalization Form draft that was posted on the website includes additional requirements that each revitalization plan should meet at a minimum. Although the majority of these new standards are reasonable, some of them will be highly dependent on each municipality's approach and their level of detail taken at the time of adoption. We believe the following standards should be removed from this year's revitalization form:

- *Shows by diagram or in general terms the approximate amount of open space to be provided and the street layouts; limitations on the type, size, height, number, and proposed use of buildings; the approximate number of dwelling units; and property intended for use as public parks, recreation areas, streets, public utilities and public improvements of any nature.*

This standard is both specific and vague, which makes it a potentially litigious item. The first statement is very general and open to interpretation, but the "limitations on type, size, height, number, proposed use of buildings, number of dwelling units, and location of public parks or recreation areas are details specific to the governing municipalities' zoning and land use regulations which are not commonly found in all revitalization plans. Revitalization plans usually leave those specifics out because they are meant to delineate areas of focus for redevelopment and change, outlining the data/research/reasons and general methodology to carry this out. As such, Zoning and Land Use Elements already incorporate the plan's suggestions because municipalities prefer to consistently reference Zoning and Land Use as the governing documents that control development standards.

- *Provide assurances that there will be replacement housing for the relocation of persons temporarily or permanently displaced from housing facilities within the planning area.*

As mentioned above, revitalization plans do not typically go into such detail. At most, the research or data describing the area's needs *might* include a total tally of housing units in the area. Municipalities do not

provide assurances for relocation, as this is a case-by-case scenario that is highly dependent on each property.

Finally, we believe the standard regarding the requirement of a legal description in the plan is too narrowly defined. A legal description typically refers to a metes and bounds description, which is not always the way municipalities choose to delineate the areas in these types of plans. To meet the purpose of this standard, identifying the area in other ways should also be acceptable (i.e. via maps or written descriptions using designated streets and established landmarks as boundaries).

Most of these revitalization plans have been in place for years and modifying them to add these new standards is a process that takes several months and board approvals. As such, all of the new proposed standards are, in a way, retroactive in nature due to the close proximity of their issuance to the RFA deadline, and the standards mentioned above would pose an unfair disadvantage for many municipalities that have taken the efforts to have plans in place that already meet the public purpose of this goal.

Respectfully submitted,

Housing Trust Group, LLC,
a Florida limited liability company

By:  _____
Matthew Rieger, Manager