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Sent: Thursday, May 28, 2020 4:08 PM
To: Marisa Button <Marisa.Button@floridahousing.org>
Cc: Angela Hatcher <ahatcher@blueskycommunities.com>
Subject: 2020/21 RFA Public Comment

Dear Marisa,

Thank you very much for the opportunity to comment on the 2020/2021 Request for Applications (RFA) Funding Cycle.

In general, we applaud staff's efforts in the four areas that you seem to have focused: incorporating more delineators, preventing circumvention, clustering due dates, and ensuring geographic diversification.

We do have a few observations on the 3rd Workshop Agenda.

Site Plan Approval Form – This will certainly go a long way to ensuring Readiness. Please just be aware that every municipality has a different definition and different process for Site Plan Approval. In the most extreme case, we recently closed a 9% transaction in a municipality where the Final Site Plan approval process was part of actual permitting. They approved the site plan 4 days before they issued building permits.

Site Control – We suggest you clarify what this phrase means: “include a deed or an executed lease with a Local Government for at least 50 years to demonstrate site control”. We think it means that if the Applicant either a) owns the Site and the prior owner was a Local Government, or b) the Applicant is the Lessee and the Lessor is a Local Government, then you get those 5 points. If this is the case, we agree with this concept. However, many Local Governments transfer property to their CRA expressly for the purpose of a subsequent transfer to an Affordable Housing Developer. Your definition of Local Government seems to exclude this situation from being eligible for the 5 points. **We suggest that you expand to include CRA as the Grantor/Lessor.**

If on the other hand the Deed can be from a private owner, then we caution against this. Applicants will close on the land (with Seller financing) then give back the deed if they don't win the funding. This is a significant waste of time, effort, and money. Moreover, there are impacts to the land values in those markets, because those transactions could become Comps in appraisals and market studies for all types of future developments (not just affordable housing).

Additional Developer Experience Points – We think that this section is fine, but we encourage you to create a “brighter line”, and to implement it this year, not wait until next year. Alternatively, if someone is only submitting one or two application in the entire RFA cycle, perhaps they should automatically get the 15 points.

Large County LGAO - In the Medium 9% RFA, FHFC has wisely implemented a provision that ensures that many different jurisdictions can win an LGAO Development. The methodology for this is to prohibit a winning jurisdiction from submitting an LGAO the next year. The same policy goal and methodology should be implemented in the Large 9% RFA. **We suggest adding the following language in the Funding Goals section of the Large 9% RFA (same as language in Medium RFA)**

The following cities are not eligible to compete for the Local Government Areas of Opportunity Funding Goal: Boynton Beach, Pompano Beach, St. Petersburg, Tampa.

Similarly, in the Medium 9% RFA, FHFC will give a “Preference for previously submitted [LGAO] applications”. This is important because it shows that you recognize the efforts of the local government. We do not understand why FHFC would not show the same recognition in the Large 9% RFA. **We suggest you give a preference for previously submitted LGAO applications in the Large 9% Round.**

Thank you very much,

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