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**Sent:** Tuesday, May 26, 2020 6:11 PM  
**To:** Marisa Button <[Marisa.Button@floridahousing.org](mailto:Marisa.Button@floridahousing.org)>  
**Subject:** 2020-20201 RFA Workshop Agenda Comments

Marisa,

I appreciate the thought and effort you and the team at Florida Housing have put into this 2020/2021 RFA Funding Cycle Workshop Agenda. It is encouraging to see Florida Housing moving away from a lottery-based system and adopting a system that is largely based on merit. Below are some comments that relate to the most recent agenda posting.

**Ability to Proceed**-We support Florida Housing providing additional scoring opportunities and points for projects that are more development ready prior to the application deadline.

**Final Site Plan Approval**-We believe providing a Final Site Plan Approval form for five points presents some challenges. First, each municipality determines "Final Site Plan Approval" differently. Some municipalities require engineering plans that we consider to be almost fully complete. In addition to site engineering, these same municipalities require multiple public hearings. This process typically takes 9-12 months. Some municipalities will quickly approve final site plans at staff level. Other municipalities have no formal process at all.

An unintended consequence would be municipalities' in dire need of affordable housing being passed over for those with "rubber stamp approval processes." Eventually developers would shy away from municipalities that have longer approval processes in favor of municipalities that approve at staff level, or municipalities that have no process at all. A further unintended consequence would be rising land cost as developers focus on land acquisition in areas that have developer friendly site plan approval processes.

We believe it would be best for all involved parties, including FHFC to not require local governments involvement in this process, since those processes vary from municipality to municipality. Additionally, COVID-19 has altered the way many cities/counties are currently doing business. This has delayed many of the development processes such pre application meetings, site plan approval, permitting and certificates of occupancy.

Having a developer perform more due diligence prior to application should lead to more development ready sites. An Engineer or architect certifying a developer's site plan prior to application would accomplish the goal of having more sites development ready. Requiring a developer to submit a market

study or appraisal prior to application in lieu of a municipality signing off on Final Site Plan Approval may also accomplish some of the same without involving local governments. Given that there is only five months between now and the application deadline, this issue may be best to hold off on until further vetting can occur.

**Proposed Proximity-** As previously mentioned we applaud Florida Housing's strategy to move away from a lottery-based system. Furthermore, having Proximity Scoring Levels makes good development sense. This encourages developers to submit sites that are closest to amenities to the benefit of the residents. Having five levels of scoring may unintentionally disqualify some very good walkable sites if those sites are just outside the highest proximity level. We believe a slightly wider variance of three proximity levels would still accomplish Florida Housing's goal and be more inclusive of very good sites. Having five levels of proximity will create land scarcity and drive up land cost for land that lies within the highest proximity level. Three levels of proximity would not have the same negative effect on land cost since more land would be inclusive. We are already seeing exorbitant land costs in areas where landowners are aware their site "scores well for affordable housing." Additional scoring tiebreakers could further drive up land cost and ultimately not be necessary.

**SunRail-**We understand Florida Housing's support of the SunRail system and trying to encourage development along its 16 stops. Rail transportation can be a great tool to help people commute. Adding a SunRail deal would be inclusive of only four counties, Osceola, Orange, Seminole, and Volusia. Volusia has only one stop and that stop has no other amenities within two miles of it, eliminating it from contention. Allocating funds specifically for one SunRail deal would be to the detriment of 56 other medium and small counties in the state. Additionally it would have a negative effect on lands within Osceola, Orange and Seminole Counties that are outside of a .50-mile radius from a SunRail Stop.

We would support removal of this funding preference in favor of something that is inclusive of all or most of the counties in Florida.

**Other Updates (Small/Medium)-**We would support the removal of one Local Government Area of Opportunity deal and substitute it with a goal to fund one Elderly Deal in a GAO/SADDA. There currently is no goal to fund an Elderly Deal.

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