



February 22, 2021

Marisa Button, Director of Multi-Family Allocations
Florida Housing Finance Corporation
227 N. Bronough St., Suite 5000
Tallahassee, FL 32301

Subject: RFA 2021-2022 Workshop Comments

Please consider the proposal and comments provided below in planning the 2021 / 2022 RFA process.

Our firm works with Public Housing Authorities throughout the state who are attempting to redevelop their existing public housing portfolios. As you know, these are fixed locations. In 2020, several of the RFA sorting order preferences were changed from the prior year, which had the effect of making one of our PHA client's site non-competitive for funding given their lesser proximity to various community services and grocery stores. This project was in Fort Walton Beach (owned by the Fort Walton Beach Housing Authority) and had lottery #1, and but for this tiebreaker would have been funded. We chose to submit knowing the extremely low probability of funding to show how this change would materialize in the scoring. We are unsure how many PHAs were affected by this change in scoring as we assume that some did not submit as they realized that they wouldn't be funded. By having a minimum point score in these sorting order tiebreakers relating to proximity, it excluded this PHA property that (through no fault of their own) had a site that was simply not close enough to various community amenities. If this continues, some of these properties that are in dire need of funding will continue to be non-competitive for funding.

Other applicants had the luxury of choosing sites that met these sorting order tie breaker preferences ensuring that they would make it to the lottery -- giving them at least an opportunity for funding. These PHAs though do not have that ability, and still have properties that are in desperate need of revitalization. If FHFC continues to utilize this tie-breaker we would respectfully propose that Florida Housing consider PHA properties automatically meet the sorting order / tie breaker preferences with regards to proximity to community services, grocery stores, etc., or ask that FHFC figure out a way to level the playing field with regards to PHA sites and proximity sorting order tiebreakers.

Thank you for the opportunity to provide our comments to Florida Housing.

Sincerely,

David P. Garcia
Vice President of Development
Michaels Development-Affordable, Southeast

THE Michaels ORGANIZATION