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April 20, 2021

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

**RE: RFA 2021-201 – FHFC Priorities**

Dear Marisa,

For years FHFC has demonstrated the importance of Local Government support by consistently incentivizing applicants to pursue grants, loans, and sites within revitalization areas and transit-oriented areas designated by the Local Government. Last year the new Priority designation on applications negatively affected a few Local Governments which will continue if the Priority process stays the same. We believe that it is FHFC's intention that Local Governments that make a commitment to a particular project should always have the best opportunity for success. However, the limitation of three Priority 1 applications can cause the unintended consequences of Local Governments to miss an opportunity for an affordable housing award.

One of the main contributing factors that FHFC may not be aware of is the timing of the RFA process.

- Historically, the Medium County RFA is not issued until August or September.
- Local Governments generally will not issue their RFQ's for support until issuance of the RFA when they know the required Local Government Contribution (LGC) amount. The RFQ process is time consuming and requires approval by City/County Commission.
- The Medium County RFA is typically due late October or early November leaving about 2 months between the RFA issuance date and the RFA due date to complete the Local Governments RFQ selection process.

RFQ's for Local Government Support are highly competitive and the successful developer is often not determined until a few weeks before the RFA due date. Some Developers will not know how many funding goal applications they have until close to the RFA due date.

Due to the uncertainty, some Developers compete for more than three LGAO's and therefore could secure more than three LGAOs. Simultaneously, Developers seek to secure sites that meet other Funding Goals, such as Revitalization and SunRail goals, in the event they do not receive an approval for a LGAO. The limitation of three Priority I applications causes Developers that secure more than three LGAOs, Revitalization or SunRail applications to either submit the additional applications as a Priority II or drop them completely. The effect is that some Local Governments will commit to supporting affordable housing but will not have an equal opportunity for success.

**We would like to recommend FHFC implement the following changes to the Priority process:**

1. Any application that meets a LGAO, Revitalization or SunRail Funding Goal should be classified as a Priority I application, regardless of how many applications the applicant submitted. All three of those funding goals target properties or specific projects that have a high level of interest from Local Governments.
2. Alternatively, FHFC should change the Priority I limitation from three (3) per applicant to six (6). This will help ensure that all supportive Local Governments have a competitive opportunity.

We appreciate the opportunity to provide our suggestions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stacy Banch', with a long horizontal flourish extending to the right.

Stacy Banch