



April 15, 2024

Florida Housing Finance Corporation
c/o Jean Salmonsens
227 North Bronaugh Street, Suite 5000
Tallahassee, FL 32301

Via E-Mail: Jean.Salmonsens@floridahousing.org

Re: Ten North Group's Comments to RFA 2024-214 Live Local SAIL Financing To Be Used For Developing And Reconstructing Affordable Multifamily Housing Developments ("RFA 2024-214").

Dear Ms. Salmonsens,

Ten North Group (formerly Opa-Locka Community Development Corporation, Inc.) is providing its feedback to the "temporary relocation" requirements set forth in RFA 2024-214.

Based upon our reading of RFA 2024-214 and the agenda for the 1-23-24 RFA workshop, we understand the following:

1. That the New Development and the Reconstructed Development will be underwritten and approved at the same time, thus triggering a *simultaneous* 24-month timeline for each of them to be placed in service.
2. That relocation expenses are incurred until such time as the tenants of the Occupied Development are offered a suitable unit in either the New Development or Reconstructed Development.
3. That there needs to be an option for each tenant of the Occupied Development who is not in violation of any rental terms, to move into the New Development, if desired.

This creates the following hurdles:

1. The residents of the Occupied Development would *all* need to be relocated off-site.
2. The relocation of the residents of the Occupied Development would likely be for between one year and eighteen months, depending on the size of the development.
3. The cost associated with such a lengthy relocation of all the residents of the Occupied Development would likely make otherwise qualified projects unfeasible.

We wish to recommend the following approach instead:

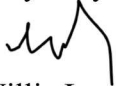
Rather than approving the New Development and the Reconstructed Development at the same time, thus triggering the *simultaneous* 24-month timeline for each of them to be placed in service, we recommend that at the option of the developer, the allocation for the Reconstructed Development be delayed until the completion of the New Development. In this way:

1. The New Development would be completed first.
2. The residents of the Occupied Development would all be able to remain in their current residences until the New Development is complete.
3. Once the New Development is complete, all the residents of the Occupied Development would be relocated to the New Development.
 - i. Upon their relocation, residents of the Occupied Development, not in violation of any rental terms who wish to move into the New Development, would be permitted to make that election and would now be treated as permanently relocated to the New Development.
 - ii. Upon their relocation, residents of the Occupied Development wishing to return to the Reconstructed Development would be permitted to make that election and would continue to be treated under the temporary relocation provisions of the Uniform Relocation Assistance and Real Property Acquisition Act (“URA”), thus requiring the developer to continue to budget for their relocation costs.
 - iii. Upon completion of the Reconstructed Development, those residents wishing to return would be permitted to do so, and their temporary relocation would end.

We hope that these comments will inform FHFC decisions in fine tuning what we think is a great idea for tackling the great need to address the Naturally Occurring Affordable Housing situation across the State of Florida.

Please do not hesitate to contact me should you have any questions or need more information regarding the foregoing.

Very truly yours,



Willie Logan, President & CEO
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