## **Report to Marion County**

## **Affordable Housing Advisory Committee**

## **Neighborhood Lending Partners**

#### Task:

Marion County has received 3 applications for Local Government Areas of Opportunity (LGAO) fundsfrom interested developers applying for the Florida Housing Finance Corporation (FHFC) Low Income Housing Tax Credit. The task is to review the applications and make recommendations to the County's Affordable Housing Advisory Committee.

#### **Process:**

Each developer submitted an application to Marion County for funding. FHFC has a extensive application process that reviews all information, and scores them. Usually, there is tie between several dozen applicants, and a lottery is held to decide upon the winning project.

The County application did not contain all the information that FHFC requests, but does include many significant pieces of information. Some of the criteria is a yes/no decision, others require more analysis,

The criteria for the 2025 cycle has not yet been approved, so the criteria for 2024 was used, with exception noted,

#### **Selection Criteria:**

The following items were reviewed to evaluate each of the proposals:

1) Is the development in a SADDA/QCT area?

SADDA" refers to Small Area/Difficult to Develop Areas, which are specific geographic areas designated by the Department of Housing and Urban Development (HU)D for the purpose of incentivizing affordable housing development. These areas are often characterized by high costs of land, construction, or utilities relative to the area's median income.

"QCT" refers to Qualified Census Tracts, which must have 50 percent or more of households with incomes below 60 percent of the Area Median Gross Income (AMGI) or have a poverty rate of 25 percent or more.

This designation is only for family housing, not for senior housing. The information is mapped on the FHFC website. This is a yes/no question.

## 2) Proximity Scoring

FHFC evaluates applications based in its proximity to services such as health care, public transportation and grocery stores. There is a minimum score that a development must receive (which is 7 points). However, if a development receives a LGAO allocation it does not need to meet the proximity score minimum. However, they may qualify for the proximity funding preference (which is 9 points).

All distance evaluations were performed though Google Maps. For the bus stop proximity, a substitution could me made if the development provides private transportation. That question was not asked of the applicants, so is not considered in the scoring.

For proximity points for schools, grocery stores, pharmacies and medical facilities, only the top 3 high scores of the 4 categories are used (so one is not counted). It also should be noted that Google is not always accurate, and omissions could be on the maps.

#### 3) Minimum Distance Requirement as set by FHFC

FHFC scores applications if there is a certain mileage between FHFC projects serving the same demographics that were recently developed. However, it should be noted that if the development receives LGAO funds, that is not calculated, and there are other criteria that would also make it meet the requirement. This is being shown only to indicate to reviewers if the development does not meet this requirement, their chances of success are limited without the LGAO funds.

## 4) Strategic Location

In the Marion County application, the Board of County Commissioners have set strategic locations for consideration. Those areas are:

- a. Urban Growth Boundaries
- b. Community Redevelopment Agency (CRA) District
- c. Low Income Census Tract

The applicants state in which category they are applying. This information will be verified.

# 5) Income Level Analysis

A review will be made on what percentages of the total units serve the lowest income populations

## 6) Marion County Subsidy Per Unit

A review will be done on how much Marion County funds will be spent per unit.

# 7) Length of Affordability Period

A review will be conducted on how long the development will remain affordable.

# **Projects:**

## Oak Valley

Oak Valley is a 90 unit elderly development being proposed by the Housing Trust Group. It is the second phase of a prior 96 unit project that was previously constructed.

1) SADDA/QCT – Not applicable, is a senior development

#### 2) Proximity Scoring

Item	Item Name	Distance	Points
Schools	Vanguard HS	1,106 feet	4
Grocery Stores	Harveys	5,199 feet	2.5
Pharmacy	CVS	1.21 miles	2
Bus Stop	28 <sup>th</sup> /4th	697feet	2
Medical	Dr Phillips	2.25 miles	0
Total Points			8.5

- 3) Minimum Distance Requirement The property is adjacent to one owned by the same entity, so this would qualify, even though it is next door to an existing senior development.
- 4) Strategic Location The application was marked that it was in the Urban Growth Boundary, and that was confirmed at <a href="https://data-marioncountyfl.opendata.arcgis.com/datasets/urban-growth-area-1/explore">https://data-marioncountyfl.opendata.arcgis.com/datasets/urban-growth-area-1/explore</a>.
- 5) Income levels 60% AMI or below
- 6) Subsidy Per Unit 90 units, \$460,000 requested \$5,111
- 7) Length of Affordability Period 50 Years

## Magnolia Terrace

Magnolia Terrace is a 92-unit elderly development being proposed by Jonesboro Investment Group

- 1) SADDA/QCT Not applicable, is a senior development
- 2) Proximity Scoring

Item	Item Name	Distance	Points
Schools	Jones Elementary	2,461 feet	4
Grocery Stores	Aldi	5,122 feet	2.5
Pharmacy	CVS	1,992 feet	3.5
Bus Stop	23/10 <sup>TH</sup>	50 feet	2
Medical	Ocala Family	3,152 feet	3
Total Points	Grocery Store Not Counted		10.5

- 3) Minimum Distance Requirement The property meets the requirements,
- 4) Strategic Location According to the application, it is stated that the property is located in a Community Redevelopment District. According to the Ocala GIS website, that is not the case. However it is located in the Urban Growth Area,
- 5) Income levels The application indicates that households at 40, 50 And 60% AMI or below will be served.
- 8) Subsidy Per Unit 92 units, \$460,000 requested \$5,000
- 6) Length of Affordability Period 50 Years

#### **Madison Oaks West Phase II**

Madison Oaks West is a 96 unit family development being proposed by New South Residential, LLC. This is an addition to a previously built development.

- 1) SADDA/QCT The property is in a Qualified Census Tract
- 2) Proximity Scoring

Item	Item Name	Distance	Points
Schools	Howard Middle	4,574 feet	3
Grocery Stores	Harveys	1.56 miles	1
Pharmacy	Walgreens	1.4	1.5
Bus Stop	21st St/24th Rd	50 feet	2
Medical	Walden Care	2,51 miles	0
Total Points	Medical Not Counted		6.5

- 3) Minimum Distance Requirement The property is adjacent to one owned by the same entities, so this would qualify.
- 4) Strategic Location The applicant stated that it is located in a low income census tract. That is confirmed.
- 5) Income levels The application indicates that households are at 50% AMI or below
- 6) Subsidy Per Unit 96 units, \$460,000 requested \$4,791
- 7) Length of Affordability Period 50 Years

#### Recommendation

#### Based on this criteria,

- 1) All of the projects either met the SADDA/QCT criteria, or that was were not required because it was a senior development.
- 2) Oak Valley had the highest proximity score and met the preference requirement. The others did not, but would not need if received the LGAO funds.
- 3) All met the minimum distance requirements
- 4) All met the strategic location requirement, although Magnolia Terrace indicated the wrong one.
- 5) All serve low income populations.
- 6) Magnolia Oaks has the lowest subsidy per unit.
- 7) All have the same affordability period

It should be noted that although the goals and rules for 2025 have not been set and approved yet. FHFC staff is recommending that:

"In RFA 2025-201, the first goal is for Applications that demonstrate continuous Local Government Area of Opportunity support since 2023 and 2024 or earlier. Then, towards the end of the funding selection process, we proposed selecting up to two additional Applications that qualify for the Local Government Areas of Opportunity Funding Goal or Applications that qualify for the GAO/SADDA Goal that can be fully funded. These later Applications will be selected regardless of whether they have previous support and, therefore, can be "first time" LGAO Applications." – Jean Salmonsen, FHFC, Director of Allocations, Multifamily Programs.

While this goal may not be adopted, with the previous County funding of Madison West, and the lowest subsidy per unit, I recommend that the Affordable Housing Advisory Committee approve funding for Madison West.

George Romagnoli

Neighborhood Lending Partners