

### About the Florida Housing Coalition

We are a statewide nonprofit organization providing training and technical assistance to local governments and nonprofits on all things affordable housing.

#### Our work covers:

- Compliance with local, state, and federal affordable housing programs
- Affordable housing program design
- Capacity building for nonprofit housing providers
- Land use planning for affordable housing
- Research & data gathering

We can provide free training and technical assistance to you under the Catalyst Program.



### Thank You to the Florida Housing Catalyst Program



### **AFFORDABLE HOUSING CATALYST PROGRAM**

Sponsored by the Florida Housing Finance Corporation



we make housing affordable™



### Florida Housing Coalition Presenters



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### **Guest Speaker**



### Carolyn Avington

Vice President of Finance/CFO



### Webinar Logistics

- All participants are on mute.
- Please type questions and comments into the question box on the side panel.
- We will not identify who has asked a question.
- Webinar is recorded.
- PPT is provided as a handout.
- For follow-up information or problems downloading handouts, please contact ankudowich@flhousing.org.



### **Poll Question**

- Who's attending?
  - Local government
  - Nonprofit
  - For profit developer
  - Other



### Agenda

- What is Adaptive Reuse?
- Why Adaptive Reuse?
- Evaluating Opportunities
- Financial Resources
- Community Spotlights



### What is Adaptive Reuse?

Reusing or recycling and conversion of an existing building/structure for an alternative purpose.



The Miami Heart Institute (formerly The King Cole Hotel) adaptive reuse to Ritz Carlton Residences. Source:

https://www.buildingenclosureonline.com/articles/89227-the-largest-residential-adaptive-reuse-in-south-florida



Former Euclid School in St Petersburg, FL adapted to housing



### **Common Applications**

- Reviving an older building, usually a historical structure that has intrinsic value to a community such as a school, church, or theatre structure.
- These buildings are typically identifiable landmark structures for which a city or neighborhood is known, but their original use no longer meets the needs of the community.





Historic factory in Ybor City, Tampa adapted to housing. Historic image source: Burgert Brothers, Courtesy, Tampa-Hillsborough County Public Library System



### **Potential Opportunities**

- Vacant hotels
- Vacant retail
- Vacant office
- Surface parking lots
- Schools
- Industrial conversion areas





### Benefits of Adaptive Reuse

- Existing infrastructure
  - Transforms building lifecycle
  - Addresses obsolescence
- Waste reduction
  - Responsible and sustainable
- Historic preservation and cultural value
  - Preservation
- Can be catalyst for or expand redevelopment efforts
  - Community transformation



## Planning Initiatives Adaptive Reuse Can Support

- Overlay Districts
  - Flexibilities in uses, regulations
- Transit Oriented Development
  - Support for bikes, pedestrians, vehicles, public transit
  - Improved connectivity by expansion of transportation nodes to activity centers
- Mixed-Use Development
  - Anchor stores to help subsidize low-income renters
  - Agglomeration to improve resilience to disruptions
- Agglomeration
  - Increases resilience against shocks/stressors



### Evaluating the Scale of Opportunities Available

- Number of similar properties available
- Size and vacancy
- Location
- Zoning and land use
- Other site-specific issues



Source: https://www.multihousingnews.com/gsp-mcshane-complete-florida-adaptive-reuse-project/ Clearwater, FL adaptive reuse of abandoned office building to mixed use development



### Ownership + Site Control

Long-term ground lease allows:

- Property Owner maintains control of common area maintenance, long-term requirements for financing.
- Lessee owns the improvement(s)



# Design Considerations – Adapting to Housing Requirements

- Substructure (foundations, slabs)
- Shell (floors, enclosures, windows, doors)
- Interiors (partitions, doors, railings, finishes)
- Services (plumbing, HVAC, fire protection, electrical)
- Equipment and Furnishings (casework)
- Special Construction/Demolition
- Building Sitework



### **Evaluating Cost + Financing Options**

- New Market Tax Credits in combination with Historic Tax Credits
- Some type of local government financing
- Low-Income Housing Tax Credits
- Debt financing



### Determining Highest + Best Use

- Should the existing improvements on the property be:
  - Maintained in their current state?
  - Altered in some manner to make them more valuable?
  - Demolished to create a vacant site for a different use?
- Is the reuse project:
  - Legally Permissible
  - Physically Possible
  - Financially Feasible
  - Maximally Productive



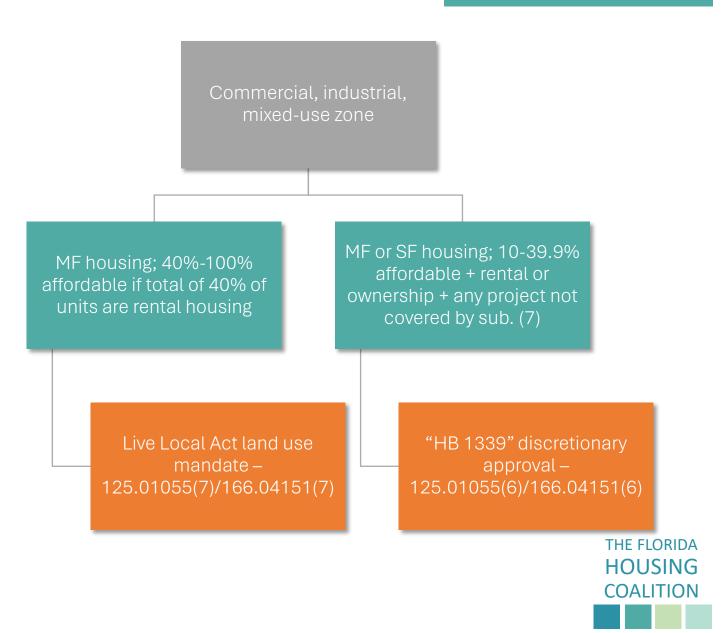
### Determining Highest + Best Use

- If renovation or redevelopment is warranted, when should the new improvements be built?
- The cost of modifying the improvement and the value gained in that modification are accounted for in the determination of highest and best use.
- Land appreciates in value: The land is more valuable than the building itself



HB 1339 (2020) + Live Local Act (2023) w/ SB 328 (2024)

These two land use tools can facilitate adaptive reuse developments in commercial and industrial areas that have an affordable housing component.



# Live Local Act Land Use Mandate – s. 125.01055(7)/s. 166.04151(7), F.S.

- Mandate introduces use, density, height, floor area ratio, administrative approval, and parking standards for affordable housing development if a proposed project is:
  - Multifamily or mixed-use residential in any area zoned for commercial, industrial, or mixed use;
  - At least 40% of units are rental units affordable for households up to 120% AMI for at least 30 years; and
  - If mixed-use, at least 65% is residential
- Local government cannot require a development authorized under this preemption to obtain a zoning/land use change, special exception, conditional use approval, variance, or comp plan amendment for use, density, height, floor area ratio, or parking (under certain limited circumstances).



## Live Local Act Land Use Mandate – Entitlement Summary

Use

Multifamily or mixed-use with multifamily allowance in commercial, industrial, or mixed-use zones without zoning or land use change

Density

Highest density allowed on any land in City or County where residential development is allowed

Height

Highest currently allowed height for a commercial or residential development within 1 mile of the proposed development or 3 stories, whichever is higher Exception – if proposal is on two or more sides adjacent to SF zoned property within single-family home development w/ at least 25 contiguous SF homes, LG may limit height to the highest of the following:

- 150% of tallest building adjacent to development
- Highest currently allowed height for the property based on LDRs
- 3 stories



# Live Local Act Land Use Mandate – Entitlement Summary Cont'd.

Floor Area Ratio 150% of the highest currently allowed FAR in the jurisdiction where development is allowed under the jurisdiction's LDRs

Parking

Reduction of at least 20% if proposal is 1) within  $\frac{1}{2}$  mile of a "major transportation hub"; and 2) has available parking within 600 feet.

Elimination of parking requirements if proposal within an area recognized by the jurisdiction as a transitoriented development or area

Proposal must be administratively approved if proposal satisfies the LDRs and is otherwise consistent with the comp plan excepting density, FAR, height, and use.

Admin approval

HOUSING COALITION

## Live Local Act Land Use Mandate – Other Notable Provisions

- All other state and local laws still apply to LLA preemption projects.
- Proposals within a transit-oriented development or area must be mixed-use residential.
- Consider the 20% Rule.
- Additional exceptions for:
  - Areas in close proximity to an airport any in "airport-impacted areas"
  - Administrative approval standards in areas in close proximity to a military installation
  - Recreational and commercial working waterfront



## HB 1339 Land Use Tool – s. 125.01055(6)/s. 166.04151(6), F.S.

<u>Discretionary land use tool</u> to approve eligible affordable housing in commercial and industrial areas without needing a rezoning or comprehensive plan amendment. Parameters:

- Development of housing that is affordable per s. 420.0004 (single-family and multi-family);
- At least 10% of units are affordable for income-eligible households as defined by the local jurisdiction (max of 120% AMI);
- The tool is self-executing and does not require the jurisdiction to adopt an ordinance or regulation before using this land use approval.

Jurisdictions that have implemented to date: St. Petersburg, Jacksonville, West Palm Beach, Lakeland, Boca Raton



### LLA Land Use Mandate vs HB 1339 Land Use Tool

Local discretion?	F.S. 125.01055(7)/166.04151(7) Live Local Land Use Mandate	125.01055(6)/166.04151(6) – "HB 1339" tool
Local discretion?	Not for use, density, height, floor area ratio, certain parking standards, and admin. approval	Yes
Eligible zones	Commercial, industrial, mixed-use	Commercial, industrial
Types of development	Multifamily or mixed use residential if 40% of units are affordable rentals	Any residential project (rental or ownership; SF and MF)
Affordability requirement	At least 40% of units affordable for 30 years	At least 10% of units affordable (affordability period up to local discretion)
Local authority	Preempted on certain standards regarding use, density, height, floor area ratio, parking, and admin. approval All other state and local laws apply	Discretion to regulate in any manner



### Policy Ideas for HB 1339 + Adaptive Reuse

- Serving lower-incomes.
  - Issue. Sub. (7) allows developments that serve up to 120% AMI to receive the favorable land use standards sub. (6) gives local governments discretion to set AMI levels
  - Policy idea. LGs can use sub. (6) to require less % of affordable housing in exchange for building units affordable to lower-income households
- Encouraging development away from flood-prone or other less resilient areas.
  - Issue. Sub. (7) does not exempt Coastal High Hazard Areas, floodplains, or other high-risk areas from use of the tool.
  - Policy idea. Use sub. (6) to require less % of affordable housing in exchange for building away from high-risk areas.

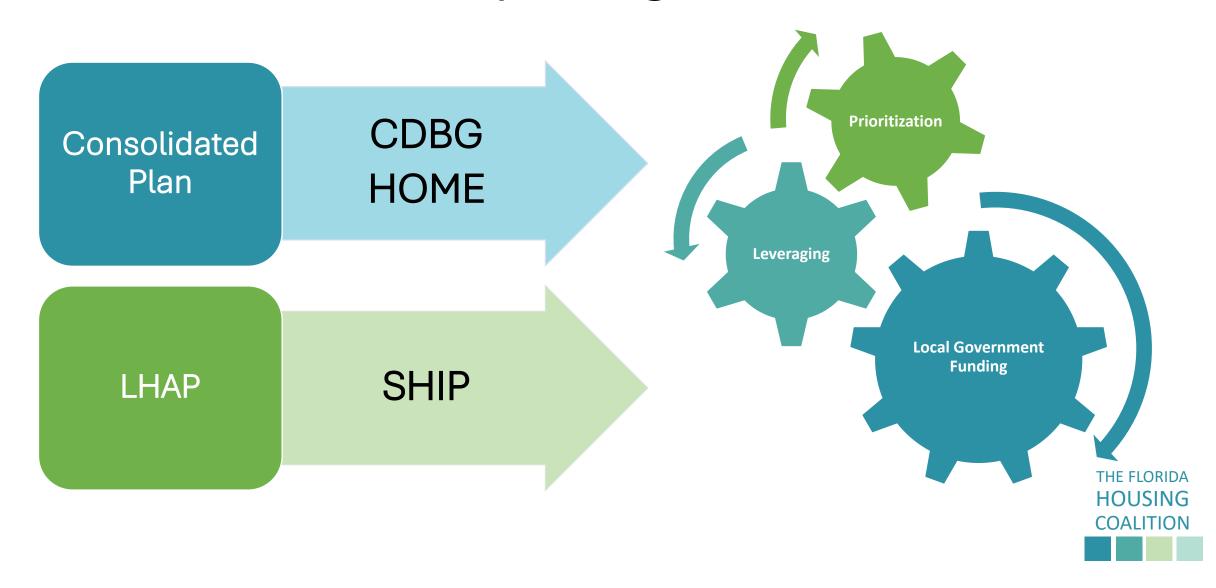


### Policy Ideas for HB 1339 + Adaptive Reuse

- Avoiding the 20% Rule to approve multifamily-only development.
  - Issue. (7)(f) limits the use of the tool in certain jurisdictions to mixed-use residential.
  - Policy idea. Use sub. (6) to approve a multifamily-only development.
- Approving affordable condos.
  - Issue. (7) only applies to developments with a rental housing component whereas (6)
    offers full flexibility on rental and ownership mix.
  - Policy idea. Use sub. (6) to approve affordable multifamily ownership opportunities.
- Approved affordable single-family homes.
  - Issue. (7) only applies to multifamily developments.
  - Policy idea. Use sub. (6) to approve affordable single-family homes (rental or ownership).



### Local Government Spending Plans



# Community Development Block Grant (CDBG)

#### Activities

- Acquisition (undertaken by the grantee, a public agency, or a nonprofit), including surveys, appraisals, legal documents, recording fees, etc. for purchase
- Rehabilitation
- Conversion of existing non-residential structures to housing
- Operating subsidies
- Infrastructure (water/sewer)



# Community Development Block Grant (CDBG)

#### Considerations

- Compliance with a National Objective: Low and Moderate Income (at or below 80% AMI), Slum and Blight, Urgent Need
- CDBG can be used for any infrastructure that is owned by a public or nonprofit agency.
- Qualifying an acquisition activity under one of the CDBG national objectives depends entirely on the use of the acquired real property following its acquisition.
- A preliminary determination of compliance may be based on the planned use.
- The final determination must be based on the actual use of the property, excluding any short-term, temporary use.



# HOME Investment Partnership Program (HOME)

- Activities
  - Rehabilitation (conversion is treated as rehabilitation under HOME)
  - Acquisition of Property
- Examples of Use
  - Conversion of an existing structure to affordable housing



# HOME Investment Partnership Program (HOME)

### Requirements

- Focus population: households with income up to 80% AMI; when used to assist renters, 90% of a jurisdiction's HOME-assisted rental units must be occupied by households with income up to 60% AMI. Additional affordable set-aside requirements may apply.
- HOME can be used for the housing portion of mixed-use projects, and for the low-income units of a mixed-income housing development.
- Track the actual costs of the affordable housing units in a mixed-use project.
- In a mixed-income project, the costs of the affordable units can be pro-rated as portion
  of the total development costs, when the units are comparable in terms of size and
  amenities.



# HOME Investment Partnership Program (HOME)

#### Considerations

- If conversion involves additional units beyond the walls of an existing structure, the entire project is new construction.
- Acquisition of existing standard property, or substandard property in need of rehabilitation, is eligible as part of either a homebuyer program or a rental housing project.
- After acquisition, rental units must meet HOME rental occupancy, affordability, and lease requirements.
- Conversion to commercial use is ineligible.



# State Housing Initiatives Partnership (SHIP) - Funding Set Aside

At least 65% for homeownership

No more than 25% for rental

At least 75% for construction, rehabilitation, or emergency repair

At least 20% for persons with special needs

No more than 20% for manufactured housing

Overall household income cap at 140% AMI with at least 30% for:

- Very Low Income (< 50% AMI)
- Low Income (< 80% AMI)



# State Housing Initiatives Partnership (SHIP) - Construction

- Construction/rehab of rental housing
- Construction/rehab of ownership housing
- Matching dollars for federal housing programs
- Land acquisition



# American Rescue Plan - Coronavirus State & Local Fiscal Relief Funds (SLFRF)

- All counties and 77 cities in Florida received SLFRF dollars through the American Rescue Plan
- Remaining cities, towns, and townships were eligible to receive SLFRF from the Florida Division of Emergency Management
- Can be spent on a variety of activities to respond to the public health and negative economic effects of COVID-19, including assistance to households, small businesses, nonprofits, or aid to impacted industries
- These funds can be spent on affordable housing activities
- Funds were to be obligated and spent by Dec. 31, 2026
- If you still have unused funds, consider adaptive reuse projects!



# American Rescue Plan - Coronavirus State & Local Fiscal Relief Funds (SLFRF)

- Treasury rules & guidance expressly allow SLFRF to be used for affordable housing initiatives including:
  - Development of affordable housing
  - Rent and mortgage assistance
  - Housing vouchers and relocation assistance
  - Supportive housing services to improve access to housing for individuals who are homeless
- "A city could determine that its low-income residents faced disproportionate effects of COVID-19 and develop affordable housing targeted to these households." Pg 104 Final Rule



# American Rescue Plan - Coronavirus State & Local Fiscal Relief Funds (SLFRF)

- Conversion of vacant or abandoned properties into affordable housing
- Rehabilitation, renovation, maintenance, or costs to secure vacant or abandoned properties
- Costs associated with acquiring and securing legal title of vacant or abandoned properties
- Removal and remediation of environmental contaminants or hazards
- Demolition or deconstruction
- Greening or cleanup of vacant lots, as well as other efforts to make vacant lots safer for the surrounding communities



#### Other Federal & State Programs

- Low Income Housing Tax Credits (LIHTC)
- Historic Tax Credits (HTC)
- New Market Tax Credits (NMTC)
- Brownfields
- US Dep. of Transportation
  - Transportation Infrastructure Finance and Innovation Act (TIFIA)
  - Railroad Rehabilitation and Improvement Financing (RRIF)
- Local General Revenue and other local funds (e.g., tax increment financing)



#### Complementing Strategies for Adaptive Reuse

- Tax Increment Financing (TIF) in a CRA Boundary:
  - Increased Property Tax Revenue -> Recycling Revenue within CRA Boundary
  - Community Stabilization
  - Economic Stabilization
- Lien Waiver Programs
  - Ability to proceed
  - Liens waived upon development of affordable housing



#### **Guest Speaker**



## Carolyn Avington

Vice President of Finance/CFO



#### Redevelopment Plans for the former Edward White Hospital







#### About SPHA

**SPHA** Leadership

**SPHA Board of Commissioners** 



Michael Lundy President/CEO



James **Dates** Chair



Kimberlv **Brown-Williams** Lipsey Scott Vice Chair



Terri Commissioner



**Angel** Charlton Resident Commissioner



Jerrilyn **Evans** Commissioner



Derek Kevs Commissioner



Meiko Sevmour Commissioner

The St. Petersburg Housing Authority (SPHA) was founded in 1937. We are the leading affordable housing provider in St. Petersburg.

Our mission is to provide safe, sanitary, accessible, decent, and affordable housing to eligible citizens of the city of St. Petersburg, while enhancing and promoting resident self-sufficiency. To achieve that mission, SPHA operates three housing programs, Public Housing, Affordable Housing, and Housing Choice Vouchers (commonly known as Section 8). Together, these programs provide quality and sustainable housing opportunities for approximately 4,000 qualifying low-income households.

#### **Redevelopment Plans**

The St. Petersburg Housing Authority (SPHA) is completely renovating the former Edward White Hospital building. It will house three facilities:

- **1. Senior Affordable Housing:** (62+ senior living community) The building will contain 71 senior housing units.
- 2. New St. Petersburg Housing Authority Headquarters: Our new administration offices will be located on the ground floor, covering approximately 17,890 sf.
- 3. Evara Health: (Clinic) Evara Health's Primary Care is accredited by the National Committee for Quality Assurance (NCQA) and by the Accreditation Association for Ambulatory Health Care (AAAHC). Evara Health is Certified by AAAHC as a Patient-Centered Medical Home: the model is best described as a philosophy of medical care that is patient-centered, comprehensive, team based, coordinated, and focused on quality and safety. Evara Health's Primary Care services are provided by board-certified physicians and advanced practice clinicians (which may include nurse practitioners and physician assistants).

#### **Executive Summary**

The building will be completely renovated in order to provide quality, affordable senior housing to St. Petersburg. The site is located in the North Kenwood district in St. Petersburg, a short trip to many of the city's amenities and thriving businesses.

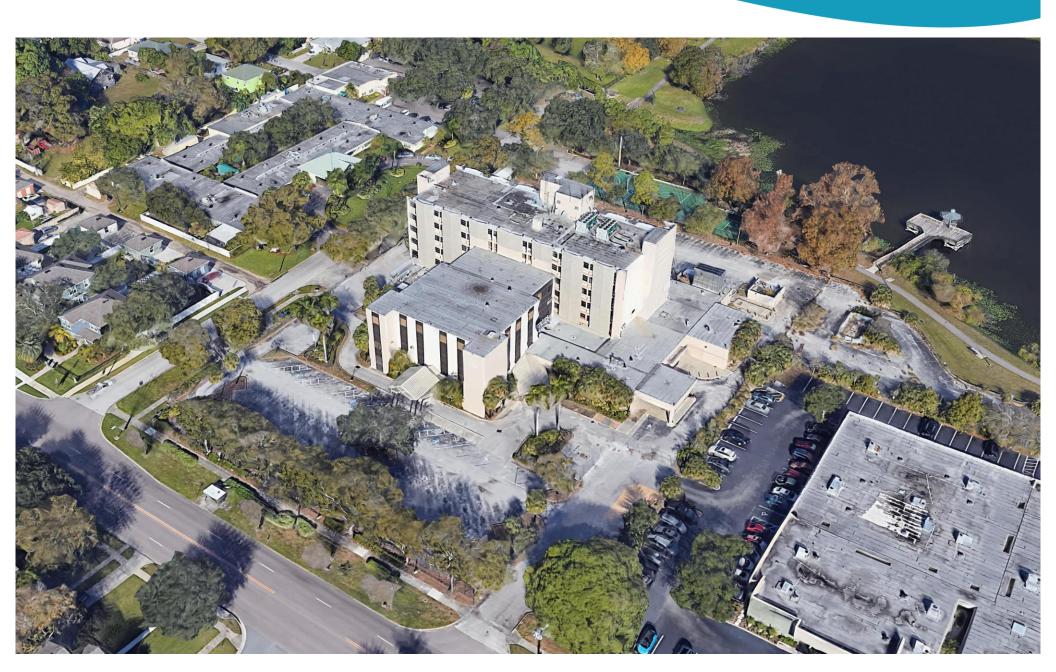
The property is adjacent to Booker Creek Park lake with lake views and access to the walking trail, basketball and pickleball courts, as well as park amenities on the north side of the lake. All sides of the 6-story building have unobstructed views. Entry into the residences will be from the North parking lot. The first floor lobby will have an open dining hall, and there will be a catering kitchen available to the residents. The mail room and bike storage will be at ground level. The ground level will also include three 2-bedroom units. The housing management offices will be located near the building's circulation core, providing on-site and easy access for the staff and residents.

SPHA's administration offices will also be located on the ground floor, covering approximately 17,890 sf (south half). The remaining housing units, a library, computer lab, and fitness center will be distributed among the second, third and fourth floors. Sixty of the units will be one-bedroom, along with seven studio units and four two-bedroom units, for a total of 71 units.

The building will be updated to meet ADA accessibility code requirements. The site will also address pedestrian access and ADA accessibility.

The exterior of the building can expect to receive a fresh look with all new windows, doors, paint, murals, and site landscaping. The intent is to bring the vibrancy of downtown St. Pete to this historic building.

# **Existing Corner Southeast**



#### **Proposed Corner Southeast**



# **Existing Back Entrance**



## **Proposed Housing Entrance**



## **Existing West View**

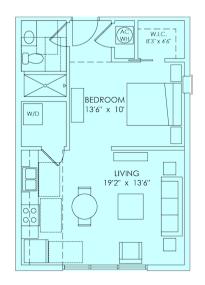


## **Proposed West View**

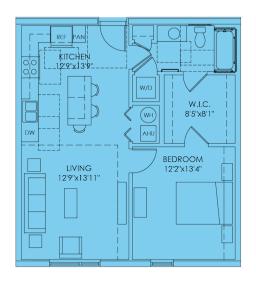


#### **Senior Housing Plans**

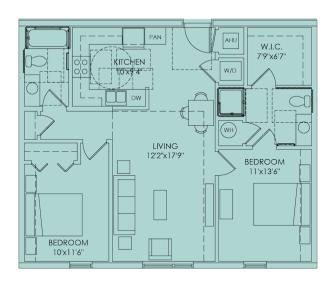
#### **71 Senior Housing Units**



Studio Unit (7 Overall)



1 Bedroom Unit (60 Overall)

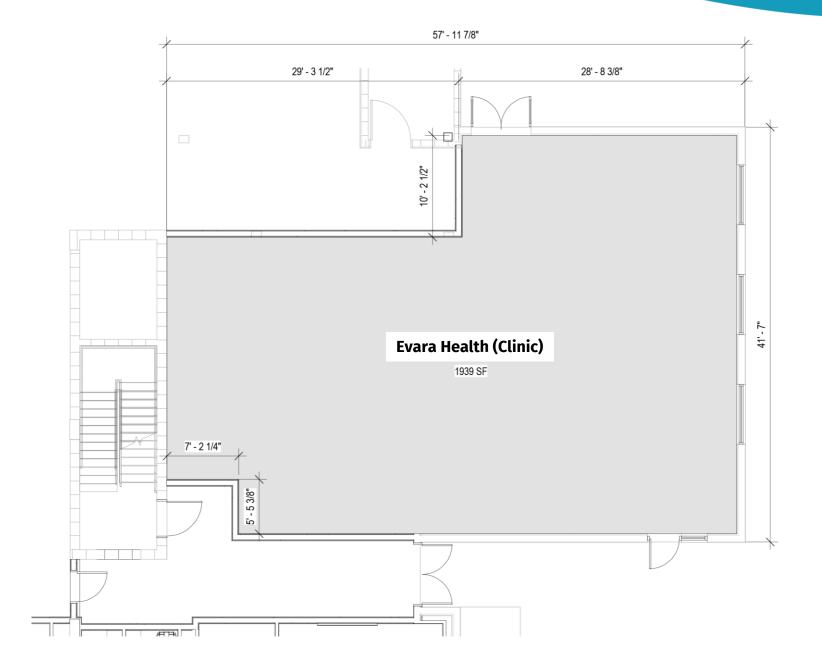


2 Bedroom Unit (4 Overall)

#### **Ground Floor Plans**



#### **Evara Health (Clinic) Plans**



#### **Sources and Uses of Funds**

U	s	e	s	0	f	F	u	n	d	s

Acquisition Costs	\$ 5,151,214
A & E	\$ 2,133,328
Contingency Phase I	1,469,763
Contingency Phase II	\$ 2,861,008
Phase I	\$ 7,348,813
Phase II	\$ 19,848,724
Developer Fee	
Total Uses	\$ 38,812,850

SPHA Funding	
Equity for Acquisition	\$ 1,051,214
RISE	\$ 1,000,000
SPHA Reserves	\$ 1,900,000
SPHA Administrative Fees	\$ 1,000,000
PILOT funds	\$ 306,359
SPHA Developer Fee	\$ 2,996,963
Total	\$ 8,254,536

#### **Sources of Funds**

SPHA
Acquisition Loan (Valley Bank)
Construction/Permanent Debt
City of St. Petersburg (Penny for Pinellas)
Unknown (New Market Tax Credits)
Home Depot Foundation
Pinellas County Foundation (ARPA)
TD Bank "Housing for Everyone"
Federal Home Loan Bank (NY or Atlanta)
City ARPA Funds

\$ 8,254,536	Committed
4,100,000	Committed
11,420,000	Committed - Valley Bank waiting for GC signed contract
3,000,000	Committed
4,000,000	Dudley Ventures is working on commitments
350,000	Will be awarded 8-2024
500,000	Committed
250,000	Will be awarded 4-2024
1,000,000	Committed - 8-22-2023
5,938,314	Committed
\$ 38,812,850	

#### **Contact**



**Creating Opportunities for Stronger Communities** 

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#### Local Code Examples to Facilitate Adaptive Reuse

- In addition to the Live Local Act and HB 1339 land use tools, local governments can design their own codes to facilitate adaptive reuse.
- Elements to look for:
  - Use allowances (types of uses; by-right, conditional, or special use, etc.)
  - Use-specific regulations (% of residential v. non-residential, placement of various uses, etc.)
  - Approval processes
  - Design and compatibility standards
  - Nonconforming use provisions



#### Alachua County Hotel Conversion Ordinance

Sec. 404.20.5 – Multiple-family dwelling.

A multiple-family dwelling is allowed as permitted use in R-2, R-2a, R-3, RP, within TNDs/TODs, and as a limited use in BH [Business, Highway] subject to the following standards.

- (a) Adaptive reuse. Multiple-family dwellings must be a part of an adaptively reused hotel or motel structure. Expansion of the use in newly constructed structures is allowed such that the total number of dwelling units is equivalent to no more than two hundred (200) percent of the number of rooms in the existing hotel or motel structure.
- (b) Water/sewer. The use must be served by centralized water and sewer.



## Osceola County – Adaptive Reuse of Commercial Buildings in CRAs

Sec. 3.8.1(U)

- Adaptive reuse of commercial buildings for residential
- Applies to 3 sub-areas of the County, including the 2 Community Redevelopment Areas
- Min. intensity, density, and heigh requirements apply
- No max. density or height requirements
- Additional regulations for ground floor non-residential, façade, roof treatment, on-site open space, landscaping, streetscape, and other requirements and exemptions

County also developed design guide reference book for developers.

#### CHANGE OF USE



Source: Osceola County – excerpt from design guide reference book



#### Pensacola – Conditional Use approval

Sec. 12-3-107. – Conditional use permit.

(b)(2): Vacant public, semi-public, institutional, church or historically significant structures within the R-1AA, R-1A, R-ZL, R-2A and R-2 zoning districts. To allow for adaptive reuse of vacant public, semi-public, institutional, church or historically significant structure within the R-1AA, R-1A, R-ZL, R-2A and R-2 zoning districts which, by nature of its size, structural layout, site layout or other unique features, could not feasibly be redeveloped for adaptive reuse under existing zoning regulations, a conditional use permit may be granted.

(b)(2)(a): Authorizes adaptive reuse conditional use permit for "any type of residential development at a maximum density of 35 units per acre . ."

Code provides additional compatibility, process, and design requirements.



#### Pinellas County Adaptive Reuse

Sec. 138-4354(c) provides an exception from an adaptive reuse project being considered a "nonconforming use" if:

- Redevelopment and reuse is for a building that pre-dates 1980, and has qualities of "significance and integrity"
- Existing total floor area and height can only be increased up to 20%
- Reuse meets other siting, setback, parking, and building features



#### **Community Spotlights**

#### Local Project: Alachua County Motel Conversions

- Renovation of 2 motels for housing + tiny home pilot
- County-owned sites on SW 13<sup>th</sup> St
- Potential use of Live Local Act land use mandate
- Units will serve people experiencing homelessness with incomes below 50% AMI, referred by Continuum of Care
- 36 1-bedroom units, 31 efficiency units, tiny container home pilot on north side of 1 motel site
- Possible eventual siting of 15-20 tiny container homes
- CDBG-CV + ERAP affordable housing funding involved



Source: Alachua County – site concept for tiny home pilot on north side of one motel site



#### Local Project: The Teale in Osceola County

- Market-rate housing
- Requires 2x gross rent for income – in 2022, that meant \$27,000-\$31,200 annual income depending on unit
- Every building pre-leased
- As of 2022, 20% of resident base employed by Disney or affiliate



Source: Google Maps



#### Local Project: Pinellas Park Pelican Lake Apartments

- 13200 49th St. N
- Conversion of 2 hotels to 183 units
- Studios starting at 360 sq ft to 2-bedroom units starting at 590 sq ft





#### Local Project: Pensacola Garden District Cottages

- Former Blount School site
   redevelopment 1 city block in size
- New development has a minimum of 6 single-family homes for incomeeligible homebuyers, remaining homes market based
- Used CDBG funds for acquisition (2011) and demolition (2012), along with funding from Escambia County
- Revenue from parcel sale for redevelopment added to City's Housing Initiatives fund



Image Source: City of Pensacola - https://www.cityofpensacola.com/2879/Blount-School-Project



# Local Project: Pinellas County Schools Teacher/Staff Housing

- Proposed adaptive reuse of School District's historic Tomlinson Adult Learning Center building in St. Petersburg
- Proposal includes 225 units with 113 designated for teachers and district employees making 90-120% AMI
- Studio, 1-bedroom, and 2-bedroom units with monthly rents ranging from \$1,263-\$2,160
- School District plans to retain ownership with a lease agreement
- Developer providing the funding





# Additional FHC Resource

Eyesore to Asset: Building Housing Affordability + Sustainable Communities

A Guidebook for Reuse of Vacant Retail

flhousing.org/wpcontent/uploads/2020/0 5/Fannie-Mae-SCIC-Guidebook-04.2020-1.pdf



#### Contact



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