

From: Robert Fink <rfink@wilhoitproperties.com>

Date: June 27, 2017 at 3:20:55 PM EDT

To: "Ken.Reecy@floridahousing.org" <Ken.Reecy@floridahousing.org>

Subject: 2017/2018 RFA Comments

Zimmerman Properties ("ZP") submits the following general comments on the RFA process to the Florida Housing Finance Corporation.

- ZP supports the removal of the "local government contribution" as a requirement of the RFAs. ZP believes that the nominal amount of resources obtained from these contributions does not outweigh the potential to further politicize and potentially block the advancement of affordable housing in Florida.
- ZP believes that the Florida Housing Finance Corporation should continue the requirement of site control documentation as a component of application for the RFAs. Allowing a "certificate statement" for site control opens the RFA process up for potential abuse and confusion. ZP applauds the intent of Florida Housing Finance Corporation to streamline its review process and supports a concept where Florida Housing Finance Corporation reduces the scope of site control documentation review to those applications in line to be selected for credit underwriting, rather than all applications submitted.
- ZP believes that geographic dispersion of affordable housing is a good policy. Equal opportunity to receive 9% tax credit resources should be given to smaller municipalities, or unincorporated portions, of Large counties. Therefore, ZP recommends the Local Government Area of Opportunity Funding Preference be removed from the Large county RFA. ZP recommends using the Local Government Area of Opportunity Funding Preference in conjunction with RFAs that focus on revitalization of an area (evidenced by a housing development's ability to contribute to a Community Revitalization Plan) and / or preservation of existing affordable multifamily housing.

Thank you for your consideration,

Robert Fink
Zimmerman Properties