

**From:** Jay Brock [mailto:jbrock@sashousing.org]  
**Sent:** Wednesday, June 19, 2013 11:09 AM  
**To:** Kevin Tatreau  
**Cc:** Steve Auger; Jean Salmonsens  
**Subject:** Comment FHFC proximity list

Kevin—

I am writing to urge FHFC to include local county HFA bond projects with 4% HC on the proximity list. I understand that FHFC has included those developments in the past but no longer includes them on the FHFC proximity list. I would suggest that once an application for 4% HC is submitted (after the project has received an inducement for the bonds at the local county HFA level), the project should be added to the list. Obviously, if these developments receive FHFC SAIL funds they would be included on the list so why would they not be included just because they only have local county HFA bonds with 4% HC.

I understand that currently the new RFA process would give full proximity points (as far as proximity to other FHFC developments) to applicants in Large and Medium Large counties so adding these local county HFA/4% HC projects to the list in these Large and Medium Large counties would not affect scoring. But at least it would give other developers notice that another project is going to be in the market place and may give them pause to reflect whether they want to add another development nearby in the event they are not aware of these other developments that will be coming into the market.

In the other Medium size and especially Small counties, FHFC clearly recognizes that it is extremely important to prevent another project from “cannibalizing” another project given the likely smaller market sizes. Again, it will also provide notice to other developers that may be considering a development in a Small county that another project financed with Local county HFA bonds will be coming into the market place.

Thanks for your consideration.

Jay Brock

Please note our new address:

335 North Knowles Avenue, Suite 101  
Winter Park, FL 32789