

**From:** Rodger Brown [rbrown@poah.org]  
**Sent:** Monday, September 16, 2013 12:07 PM  
**To:** Nancy Muller; Kevin Tatreau  
**Subject:** Comments on the Medium and Small County RFA

Good morning Ms. Muller and Mr. Tatreau

I am writing to offer comments on the August 30, 2013 Draft of the RFA 2013\_\_\_\_\_ for Affordable Housing Developments Located in Medium and Small Counties.

This latest draft in now discouraging Preservation deals to apply as an Acquisition/Rehabilitation through changes to the instructions on page 8 and the language added on page 45. By creating this new tiebreaker at the top of the list, Acq/Rehab projects that do not meet FHFC Preservation definition are given preference over true Preservation deals. Given the proposed reduction in the amount of the Preservation set-aside, the growing importance of preserving scarce federal housing subsidies and the cost effectiveness of acquisition rehabilitation projects, there is no need to exclude Preservation deals in this way. This latest language should not be included in the Medium and Small County RFA.

Thanks very much for your consideration.

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