



ROYAL AMERICAN MANAGEMENT, INC.  
ROYAL AMERICAN DEVELOPMENT, INC.  
ROYAL AMERICAN CONSTRUCTION CO., INC.

October 18, 2013

Mr. Steve Auger  
Executive Director  
Florida Housing Finance Corporation  
227 North Bronough, Suite 5000  
Tallahassee, Florida 32301

Re: Proposed 2013 Preservation RFA

Dear Mr. Auger:

In the most recent draft of the 2013 Preservation RFA, a Public Housing Authority is eligible to receive a **PHA Proximity Point Boost for Small and Medium County Applications**. In prior application cycles this 5 point boost was implemented to allow PHA's to compete with new construction developments as they were at a disadvantage in not being able to relocate their sites to maximize proximity points. Unfortunately, this has transitioned over into the most recent draft of the Preservation RFA. Since PHA deals will be competing with other Preservation deals in which neither can relocate their sites to increase their proximity points, this 5 point boost for PHA's should be eliminated to level the playing field for all Preservation RFA submittals. PHA's will have a competitive advantage over non-PHA's applications if this 5 point boost remains in effect. **Our recommendation is to delete the PHA proximity point boost.**

With the reduction in the Preservation Set-Aside this year from 35% to 10%, the number of funded applications is projected to decrease significantly over prior years. In the current draft of the 2013 Preservation RFA the **Funding Test** requirement to fully fund an application creates yet another impediment for a Preservation award. **Our recommendation is FHFC apply a 50% test for the next eligible unfunded Preservation Application thereby allowing the possibility of one additional Preservation award.**

Sincerely,



Kimberly Murphy  
Vice President  
Royal American Development, Inc.

cc: Ken Reecy, Florida Housing Finance Corporation  
Kevin Tatreau, Florida Housing Finance Corporation  
Nancy Muller, Florida Housing Finance Corporation