

THE HENDRICKSON COMPANY

1404 Alban Avenue ♦ Tallahassee, Florida 32301
Telephone: 850-671-5601
Fax: 850-671-5603

October 4, 2013

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

Re: Comments on Proposed Preservation RFA: Public Housing Authority Proximity Point Boost

Dear Mr. Auger:

As you know, the Preservation RFA, as proposed, would provide a 5 point “PHA proximity point boost”, for PHA deals in small and medium counties (where the land has been the subject of a DOT).

The original rationale for the PHA proximity point boost was in the new construction competition, where PHA’s argued that they were in essence “stuck” with their sites and whatever proximity points came with that site—and therefore were at a disadvantage to the new construction application that could select a site that scored well. The point boost only made sense in this context.

However, the proposed point boost has morphed over into the draft RFA for Preservation deals. The rationale for the boost is totally invalid—as all Preservation deals are “stuck” with their site and the accompanying proximity score. Everyone is in the same boat, and there is no reason to give a competitive advantage to PHA’s over other Preservation projects.

This is particularly important because the proposed Preservation RFA is likely to be driven by absolute Proximity Score—as the concept of everyone getting some minimal amount of points being treated as equal is not present in this RFA. I agree that the Proximity Score is a better tiebreaker than lottery, but everyone should be on a equal playing field.

Recommendation: Remove the PHA proximity point boost.

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,



Mark Hendrickson