



October 1, 2013

Mr. Stephen P. Auger
Executive Director
Mr. Ken Reecy
Director of Multifamily Programs
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, Florida 32301

RE: 2014 Competitive Housing Credit Annual Allocation- Preservation RFA comment

Dear Mr. Auger & Mr. Reecy,

Thank you for the opportunity to comment on the most recent 2013 draft of the Preservation of Existing Affordable Housing Developments RFA ("2013 Preservation RFA"). We respectfully submit for your consideration the following suggestion.

FHFC expects to have up to an estimated \$5,369,334 of Housing Credits available to fund Preservation Developments. Based on historical data, if the average Credit Request Amount in the 2013 Preservation RFA is consistent with the average Credit Request Amount in the funded 2011 UAC for Preservation (funded 2011 UAC Preservation Credit Request Amount average = \$1,069,964), only four Preservation projects will be funded throughout the State of Florida after the One RD Preservation Development and One Family Preservation Development Goals are met. This will result in a substantial reduction in the number of funded Preservation deals compared to the 2011 UAC Cycle despite the growing need for preserving RD, Section 8 and Public Housing Projects.

In the most recent draft of the 2013 Preservation RFA, FHFC has indicated the following:

"Funding Test: Applications will be selected for funding only if there is enough funding available to fully fund the Eligible Housing Credit Request Amount".

Rather than require the last application to be "fully funded", we recommend that FHFC apply a 20% test for the next eligible unfunded Preservation Application. For example, if there is \$200,000 in Credits available, the next eligible unfunded Application requesting \$1,000,000 or less will be considered for funding. (\$200,000 is 20% of the \$1,000,000 Credit Request Amount). This proposed change would also encourage an efficient housing credit request by all applicants since the ability to fund one more application might be enhanced.

Sincerely,

A handwritten signature in blue ink that reads "Alberto Milo, Jr." in a cursive style.

Alberto Milo, Jr.
Principal / Senior Vice President