

September 27, 2013

Mr. Steve Auger
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Comments on Preservation RFA 9-13-2013 Draft

The Per Unit Construction Funding Preference of a minimum of \$40,000 construction cost per unit (not including contingency or 14% GC fee) is excessive for USDA Preservation properties.

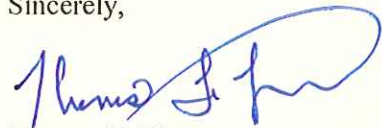
We recommend the following minimum for USDA/RD properties or remove the minimum requirement for construction cost completely.

USDA RD Elderly	\$20,000
USDA RD Family	\$26,000

These Applications are for the *Preservation* of existing affordable housing not major rehab or re-development.

Thank you for the opportunity to comment on the draft Preservation RFA. If you have any questions or need clarification on any of the above comments, please do not hesitate to contact Angela Hatcher or myself at (727) 449-1182.

Sincerely,



Thomas F. Flynn
President

Cc: Ken Reecy, FHFC
Kevin Tatreau, FHFC
Nancy Muller, FHFC

Why is there a Preference for a minimum??

- (1) The following Applications will qualify for this funding preference, as outlined in Section Four B of the RFA:

Applications that reflect an amount of at least \$40,000 per unit when the amount listed in the Total column of the Development Cost Pro Forma for the Development Cost line item A1.1 Actual Construction Cost is divided by the number of total units in the Development.

- (2) The following Applications will not qualify for this funding preference:

Applications that reflect an amount less than \$40,000 per unit, when the amount listed in the Total column of the Development Cost Pro Forma for the Development Cost line item A1.1 Actual Construction Cost is divided by the number of total units in the Development.

USDA/RD Applications average 26,000 to 28,000

Except for deferred Developer fee, the Application requires complete information on all sources of Development funding and the proposed uses of those funds. All loans, grants, donations, syndication proceeds, etc., should be detailed in the Application as outlined above. The total amount of monetary funds determined to be in funding proposals must equal or exceed uses.

9. Applicant Certification and Acknowledgement:

The Applicant's signature on Exhibit A indicates the Applicant's certification and acknowledgement of the provisions and requirements of the RFA. The copy of the Application labeled "Original Hard Copy" must reflect an original signature (blue ink is preferred).

Addenda:

The Applicant may use the Addenda section of Exhibit A to provide any additional information or explanatory addendum for items in the Application. Please specify the particular Item to which the additional information or explanatory addendum applies.

B. Funding Selection:

1. Eligibility: Only Applications that are eligible for funding will be considered for funding selection. Eligibility requirements include the following:

Eligibility Requirements	Described in RFA at:
Submission Requirements	Section Three A and Section Five
Financial Arrearage Requirements	Section Five
Preservation Development Category Requirements	Section Four A.4.c.
LDA Development Conditions	Section Four A.6.c.
Mandatory Distance Requirement	Section Four A.5.d.
Total Development Cost Per Unit Limitation	Section Four A.9.c.(17) and Item 8 of Exhibit C
All Mandatory Items	Section Five

No

Must be @ least 40,000 per unit

16

MAX FOR Rehab

\$137,000

2. Ranking Process: All eligible Applications will be sorted in the following order:

- First by the Age of Development (with preference given to Applications that demonstrate within the documentation provided at question 4.c. of Exhibit A that the proposed Development was originally built in the year 1984 or earlier);
- Next by RA Level 1, 2 or 3 (with preference given to Applications that achieve an RA Level Classification of RA Level 1, 2 or 3 at Section Four A.4.c. of the RFA);
- Next by the Application's eligibility to be considered to be concrete construction, as outlined at Section Four A.4.c.(3) of the RFA (with Applications considered to be concrete construction listed above Applications that are not considered to be concrete construction);
- Next by the Application's eligibility for the Per Unit Construction Funding Preference which is outlined in Section Four A.8.e. of the RFA (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
- Next by the Application's Leveraging Classification (with Applications that receive the Classification of A listed above Applications that receive the Classification of B);
- Next by the Application's Proximity Score (with preference given to Applications with the highest proximity score in Section Four A.5.c. of the RFA);
- Next by RA Level (with preference given to Applications with the lowest RA Level Classification so that RA Level 1 Applications receive the most preference and RA Level 6 Applications receive the least preference);
- Next by the Application's eligibility for the Florida Job Creation Preference which is outlined in Exhibit C below (with Applications that qualify for the preference listed above Applications that do not qualify for the preference);
- And finally by lottery number, resulting in the lowest lottery number receiving preference.

Delete

Min of \$40,000

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

4. County Test: Funding will be limited to 1 Application per county (County Test), unless the only eligible unfunded Applications that can meet the Funding Test are located in a county where an Application has already been tentatively selected for funding, as further outlined below.

Existing 515 or 514/516

5. Goals: The Corporation has a goal to fund at least one Elderly RD Preservation Development and up to one Family Demographic Development. To be eligible for the Elderly RD Preservation Development goal, the Application must have met all of the RD 538 Program requirements outlined in Section Four A.8.b.(3)(c). To be eligible for the Family Demographic Development goal, the Applicant must have selected the Family Demographic at question 1 of Exhibit A. Any Application selected to meet these goals will count for purposes of the County Test. The Corporation is not precluded from funding another eligible Elderly Demographic Application that also qualified for the Elderly RD Preservation Development goal, subject to the County Test and the Funding Test.

not new 538

6. Selection Process: The first Applications selected will be eligible Applications that meet the goals.

The first Application that will be selected for funding will be the highest ranked eligible Application that is eligible for the Elderly RD Preservation Development goal. If this goal is met, or if there are no eligible Applications that meet this goal, then the next Application that will be considered for funding will be the highest ranked eligible Application that is eligible for the Family Demographic Development goal. If the Family Demographic Development goal is met,