



November 15, 2013

Steve Auger, Executive Director
Ken Reecy, Multifamily Development Director
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, Florida 32301

RE: Comments to RFA HOME and SAIL

Dear Mr. Auger and Mr. Reecy:

Thank you for the opportunity to comment on the draft SAIL Request for Application.

Local Government Contribution:

Issue 1:

The draft RFA requires New Construction and Acquisition Rehabilitation developments to provide a Local Government Contribution in order to receive 5 points.

Request:

Keep the policy that has been established in past application cycles and RFA's, that Acquisition Rehabilitation developments receive an automatic 5 points for Local Government Contribution. Please provide another option for Acquisition Rehab developments to show local government support.

If a Local Government Contribution is required, FHFC should recognize that Acquisition Rehab developments are at a disadvantage the SAIL RFA. These deals are not eligible for impact fee waivers or deferrals because these fees have already been paid. This only leaves the option of requesting a loan or grant from local governments that are already experiencing very limited funding sources for affordable housing.



Issue 2:

Most local governments have already distributed their limited funds for developments that submitted applications under the GEO RFA's and the Preservation RFA. The local government had no way of knowing that the SAIL RFA would require a Local Government Contribution for the much needed rehabilitation needed in their community.

Request:

Consider adjusting the local government amounts to a smaller amount for the SAIL RFA or eliminating it and coming up with another form of Local Government Support.

Issue 3:

Local Government Contributions require a Local RFP and a resolution from the City or County Commission. Florida Housing stated at the November 14 workshop that new forms may be required for the SAIL RFA

Request:

If new forms are required, please make that decision as quickly as possible to that there is enough time, considering the holiday season, to get on the appropriate commission's agenda. And allow enough time for those local governments that have any funds available to issue RFP's for the distribution of those funds.

Ability to Proceed Forms

Issue:

The SAIL RFA does not address site plans or zoning requirements.

Request:

Clarify that proof of site plan and zoning will not be required with submittal of application nor is there a requirement set out in the RFA to submit this information to the credit underwriting within 7 or 21 Calendar Days.

Thank you again and I look forward to receiving your response either directly or through changes in future drafts of the current SAIL RFA.

Sincerely

Priscilla Howard

Community Solutions



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