

January 29, 2014

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

RE: Comments on draft Preservation RFA 2014-104

In response to the draft RFA released on January 24, 2014, we offer the following recommendations:

- 1. <u>Proximity Scoring and Requirements</u>: The new changes to Proximity Scoring eliminated public schools and senior centers as options for points and require a minimum score to be eligible for funding. If the current language is not revised as suggested below then many existing USDA properties will be ineligible for funding under the Preservation RFA.
 - a. Keep the language for Proximity scoring as it was written in previous RFA versions with no minimum requirements for funding eligibility.
 - b. Allow existing USDA/RD properties to be exempt or receive automatic minimum points regardless of county size.
 - c. Allow existing USDA/RD properties a 2 point boost (similar to PHA) and allow those points to count as meeting the Transit services requirement for Large Counties.
- 2. <u>Section Four, Funding Selection #(5) Goals:</u> The Corporation has a goal to fund at least one Elderly RD Preservation Development and up to one Family Demographic Development. Please add "RD" before Family Demographic Development to clarify the goal to fund one Family RD development.
- 3. Required Resident Programs: The current draft RFA requires applicants to select a minimum of 3 resident programs from the list of 4 program options. We recommend USDA properties with less than 50 units be exempt from this requirement or to satisfy the requirement by providing a minimum of 1 resident program.

Based on our management experience with smaller developments, residents do not participate in the programs as outlined in the RFA draft. Our residents do benefit from the on-site computer lab and library and will participate in community functions i.e. Bingo, holiday parties, etc.

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 me at (747) 449-1182.

Sincerely,

Thomas F. Flynn

President