

**From:** Tom Shelly [<mailto:toms@sunshinegroupproperties.com>]  
**Sent:** Tuesday, October 07, 2014 11:47 AM  
**To:** Ken Reecy  
**Subject:** Request for Applications public comments

Ken,

You solicited public comments concerning the upcoming geographic Request for Applications (RFAs), there was discussion of proximity measures for Small/Medium Counties. We ask that you consider the following statements and suggestions when establishing guidelines for the forthcoming RFA for these geographic areas:

- 1) The grocery store requirement establishes a minimum size threshold of 4,500 square feet. In Rural Areas, small, and medium counties there are many smaller full service grocery stores that are independently owned and fully licensed. **As the definition of grocery store that Florida Housing uses already requires that stores be FDACS certified, we would like to see the minimum size threshold eliminated.**
- 2) In many Small/Medium Counties, there are few systems having stops where three or more routes converge. **We would prefer that the definition of Transfer Stop for Small/Medium Counties be changed to a stop with at least two transit routes.**
- 3) Based on the last RFA issued (RFA2014-111), the only eligible community services were grocery stores, medical facilities, and pharmacies. **We would like public schools, Fire stations, library's, full service banks, credit unions, public libraries, and post offices to be considered as eligible community services as they are vital to affordable housing residents.**
- 4) Lastly, we previously stated that service groupings in small/medium counties tend to be centralized with little duplication due to the smaller number of persons served and absence/lack of competition (i.e. duplication of said services). On average, services are between 1.5 to 3 miles from reasonably priced sites that make affordable housing development feasible; however, public transportation is typically present between the two points. **We recommend the following distances and proximity point awards for small/medium counties:**

<b>Eligible Community Services Proximity of Proposed Development's Development Location Point to an eligible community service stated on the Form</b>	<b>Number of Proximity Points Awarded for Eligible Service</b>
<b>if less than or equal to 0.50 miles</b>	<b>4.5</b>
<b>if greater than 0.50 and less than or equal to 1.00 miles</b>	<b>4.0</b>
<b>if greater than 1.00 and less than or equal to 1.50 miles</b>	<b>3.5</b>

<b>if greater than 1.50 and less than or equal to 2.00 miles</b>	<b>3.0</b>
<b>if greater than 2.00 and less than or equal to 2.50 miles</b>	<b>2.5</b>
<b>if greater than 2.50 and less than or equal to 3.00 miles</b>	<b>2.0</b>
<b>if greater than 3.00 miles</b>	<b>0.0</b>

Please let me know of any questions or suggestions. Thank you,

Tom Shelly | Florida Business Manager | Sand Development, LLC | 3831 Tyrone Blvd, suite 104 St. Petersburg, FL. 33709 727.384. 4400 (ph) | 727.347.4048 (fax)  
| [TEShelly@SandCompanies.com](mailto:TEShelly@SandCompanies.com) | [www.SandCompanies.com](http://www.SandCompanies.com)