NUROCK COMPANIES

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Sent Via E-mail

November 14, 2014

Mr. Steve Auger, Executive Director & Staff Florida Housing Finance Corporation 227 N. Bronough Street, Suite 5000 Tallahassee, Florida 32301

RE: Comments for RFA's 2014-114, 2014-115 & 2014-116

Dear Steve,

Thank you for the opportunity to comment on the proposed Request for Applications Medium and Small Counties (RFA-2014-114), Six (6) Large Counties (RFA-2014-115) and Miami-Dade County (RFA 2014-116). As you finalize the RFA's we respectfully ask that you consider the following comments:

In the latest drafts of all three RFA's that were released on November 7, 2014, <u>Section One, Introduction A. SAIL RFA 2014-111 Unfunded Preference</u>: Applications for a proposed Development that meets the following criteria will receive a ranking preference above Applications that do not meet the following criteria: If an Application is submitted for a proposed Development that was either not part of an Application submitted in response to RFA 2014-111 or was part of an Application submitted in response to RFA 2014-111 that was not awarded funding. For purposes of this criteria, awarded funding shall mean that the Application was approved for preliminary funding at the October 30, 2014 Board meeting.

We believe this Unfunded Preference will have an unintended adverse consequence for "Preliminarily Funded" applications. If a preliminarily funded application from SAIL RFA 2014-111 were to lose its award through the Administrative Hearing process through no fault, action or inaction of its own, that particular applicant would not receive the "Unfunded Preference" as outlined in the current Geographic 9% RFA's (2014-114, 115 & 116). The application therefore would not receive an award from the 2014-111 SAIL RFA and then also not get a preference in the Geographic 9% RFA's.

We would also like staff to consider adding these two Grocery Store chains to the list of In-Service Time Frames for Community Service – Grocery Store list to meet the Application Deadline existence requirement, as of Application Deadline: (1) Aldi US (https://www.aldi.us/) and (2) Gordon Food Service Marketplace (GFS Marketplace)(https://www.gfs.com/en/gfsstore). Both grocery store chains have been expanding throughout the Florida market for several years and meet the minimum requirements as defined as an eligible Community Service – Grocery Store.

Thank you for your consideration and the opportunity to submit comments.

Best Regards,

Robby D. Block Vice President

Cc: Ken l

Ken Reecy (Florida Housing)

Robert Hoskins