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Sent: Wednesday, September 21, 2016 5:31 PM
To: Steve Auger <Steve.Auger@floridahousing.org>; Ken Reecy <Ken.Reecy@floridahousing.org>
Cc: Matthew Rieger <mattr@htgf.com>
Subject: Comment regarding all Geo 9% RFAs

Thank you for the opportunity to submit comments.

We respectfully request that FHFC considers the following:

1. **Allowing applicants to exclude from the Development Proximity List sites for which they are the same financial beneficiaries, not necessarily contiguous or across the street (Mandatory Distance Requirement).**

We agree with the first public comment submitted by Ryan von Weller (Wendover Group) on September 13.^[1] The same financial beneficiary should be able to develop next door or on a contiguous piece of property and also on land a lot or a block away.

2. **Adding an exception for the RECAP ineligibility for subsequent phases that meet the definition of HUD multiphase.**

HUD, in recent HUD Notices, has confirmed their intention to protect their multiphase policy. The multiphase concept was created by HUD to allow for projects to have efficiencies of scale in the operation of two or more developments simultaneously (shared payroll, amenities, expenses, etc.). This allows subsequent phases to benefit from economies of scale and to provide more affordable housing with less resources. Also, often times, subsequent phases are necessary to finalize the redevelopment of an area targeted for renewal.

Accordingly, we feel that the Corporation should not limit or impeded Developer's rights in the development of subsequent phases.

Footnote:

^[1] <http://www.floridahousing.org/FH-ImageWebDocs/Developers/MultiFamilyPrograms/2016-114/PublicComments/Comment - 2016-09-13 - Ryan von Weller - Wendover Housing Partners.pdf>

Thank you.

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^[1] <http://www.floridahousing.org/FH-ImageWebDocs/Developers/MultiFamilyPrograms/2016-114/PublicComments/Comment - 2016-09-13 - Ryan von Weller - Wendover Housing Partners.pdf>