



Blue Sky Communities
5300 West Cypress Street
Suite 200
Tampa, Florida 33607

July 11, 2019

Ms. Marisa Button
Director of Multifamily Allocations
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Comments to RFA 2019-102, CDBG-DR

Thank you for the opportunity to comment on RFA 2019-102. We appreciate the months of diligence that Staff have dedicated to the Disaster Funding RFAs.

Given the timeframe of the final RFA issuance and the application deadline, we encourage staff to remove the requirement of the Lease and revise the Land Owner Certification Acknowledgment Form as follows.

1. Add Applicant Name
2. Add Development Name
3. Insert language in paragraph 4 that clarifies an appraisal is required if the Applicant (Land Owner) is requesting Land Acquisition Funding.
4. Add language that requires the Lease (per the RFA instructions) to be provided in credit underwriting. All Priority I Applications will be required to provide a Lease in credit underwriting. Failure to provide the Lease between the Applicant and Land Owner within the timeframe outlined in the credit underwriting invitation will rescind the funding award. The lease payments must equal \$10 a year and may include reasonable external fees. The lease must have an unexpired term of at least 50 years after the Application Deadline.

The joint venture relationship is established in the Application by providing the Deed and/or Contract in conjunction with the revised Land Certification form. Requiring the Lease in the Application invites protests/petitions and delays the production of the much-needed housing in Disaster counties.

If you have any questions, please do not hesitate to contact me at 813-384-4836.

Sincerely,

Angela Hatcher
SVP – Development Programs