



June 18, 2020

Mr. Trey Price and Ms. Marisa Button
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Proximity Services Definitions in the 2020 SAIL and Geographic Housing Credit Financing RFAs For Affordable Housing Developments – 2020/2021 RFA General Process

Dear Mr. Price and Ms. Button,

The agendas provided for the March 5, 2020 and May 29, 2020 RFA Funding Cycle Workshops included some proposed changes to definitions of existing services for Proximity points. However, none of the proposed changes address a potential issue that could lead to unnecessary litigation: the temporary closure of services due to COVID-19 (i.e. Bus routes, schools, parks, libraries). The definitions for all proximity services, as they read in the latest workshop agenda iterations, contain the language “Additionally, it must have been in existence and available for use by the general public as of the Application Deadline.”

We believe that there should be a distinction made between temporary closing or suspension of services versus permanent closures in order to account for the current pandemic which may resurface throughout the year. Obtaining the appropriate evidence to prove that the nature of the closure is not permanent will be the responsibility of applicants. Therefore, we propose the language to change to the following or something similar in nature:

“Additionally, it must have been in existence and available for use by the general public as of the Application Deadline. Temporary closures or service suspensions due to COVID-19 or other emergency suspension will be considered an exception.”

Respectfully submitted,

Housing Trust Group, LLC,
a Florida limited liability company

By: 
Matthew Rieger, Manager