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## National Development of America, Inc.

September 30, 2020

Florida Housing Finance Corporation  
227 N. Bronough Street, Suite 5000  
Tallahassee, FL 32301

### Re: SAIL RFA 2020-205 – Community Service Preference

Dear Mr. Price and Ms. Button,

The DRAFT RFA 2020-205 (dated 8/28/20) has added a “Community Service Preference” to the Application Sorting Order on page 91, which requires 6.5 points for two (2) Community Services.

The “Proximity Requirements” and the “Proximity Tiebreakers used in Funding Selection Process” takes into account the county size (See below chart from page 24 of RFA) when determining scoring threshold. However, the scoring threshold does not “weight” the scoring (S/M/L = 6.5) based on county size for the Community Service Preference.

The Grocery Store Preference is consistent across small, medium and large counties. However, the threshold of .5 points is a reasonable request as it is the least amount of points provided for the grocery store service. This preference is also understandable as it aligns with identifying applications that are not located in food deserts.

Development Location	If Eligible for PHA or RD Proximity Point Boost, Required Minimum Transit Service Points that Must be Achieved to be Eligible for Funding	If NOT Eligible for PHA or RD Proximity Point Boost, Required Minimum Transit Service Points that Must be Achieved to be Eligible for Funding	Required Minimum Total Proximity Points that Must be Achieved to be Eligible for Funding	Minimum Total Proximity Points that Must be Achieved to Receive the Proximity Funding Preference	Minimum Number of Proximity Points for Grocery Store that Must be Achieved to Receive the Grocery Store Preference	Minimum Community Service Points that Must be Achieved for two Community Services to Receive the Community Service Preference*
Large County	1.5	2	10.5	12.5 or more	0.5	6.5
Medium County	N/A	N/A	7	9 or more	0.5	6.5
Small County	N/A	N/A	4	6 or more	0.5	6.5

We assume that the Community Service Preference was added to assist in the funding of strong applications. However, a strong application could have the following proximity scoring and not meet the Community Service Preference.

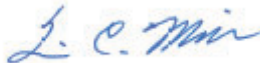
<b>Community Service</b>	<b>Points</b>
Public School	3
Pharmacy	3
Medical Facility	3
Grocery Store	3
<b>Total Points</b>	<b>12</b>

The above medium county example could also have a Transit Score of six (6), which would position that application to exceed the “Proximity Funding Preference” by as many as 9 points. This Preference could potentially weaken an application with a Proximity Score of eighteen (18) out of twenty-two (22) possible points.

Furthermore, SAIL deals require a lot of predevelopment work in order to bridge the funding gap of the 4% credits. We are asking that FHFC consider either reducing the points requirement for small/medium counties or tabling this preference until the 2021 funding cycle. This preference could eliminate strong applications that have submitted in multiple cycles without allowing proper time to re-evaluate the Developers application strategy for the 2020 round.

Sincerely,

**National Development of America, Inc.**



Eric C. Miller