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**Sent:** Wednesday, March 10, 2021 11:05 AM  
**To:** Jean Salmonsens <[Jean.Salmonsens@floridahousing.org](mailto:Jean.Salmonsens@floridahousing.org)>  
**Subject:** RFA 2021-RUL 2021/2022 Rule Development

Good morning,

Thank you for the opportunity to provide a couple of comments regarding the removal of the 15% set-aside for the Preservation Development Category, as currently proposed in the 3.2.21 draft QAP. National Church Residences understands the direction Florida Housing is heading regarding its policy surrounding "Preservation" (the current definition and its future expansion) and its desire to prioritize Preservation around the State under a goal scenario in various RFAs. This understanding does not come without concern, especially as it relates to the weight staff may have given to the written comments assuming that most Preservation developments work under the fixed 4% housing credit scenario. Each Preservation development is unique in its characteristics, such as its location, its size, its deferred maintenance, and its critical capital needs. Also, not every Preservation development is located within a QCT or DDA, which makes the 4% a viable option. We also desire to provide substantial comments during the upcoming RFA Workshops as it relates to the dire need for Preservation, especially for the at-risk seniors (age 62 and older).

Thank you,

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