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*The non-profit association representing the officials providing affordable housing in Florida.*

March 5, 2018

Trey Price, Executive Director  
Florida Housing Finance Corporation  
227 N Bronough Street, Suite 5000  
Tallahassee, FL 32301

**Subject: Comments to the QAP / re - HUD's 2018 designated DDA and QCT list and Florida's QAP and the authority to provide the 30% boost.**

Mr. Price:

Many Housing Authorities in the state cannot begin to plan any type of revitalization either through the 9% Preservation RFA or through any of the Geographic RFAs because they do not get the boost in credits which make these deals financially unfeasible.

As FHFC has acknowledged in the past, the location of PHA redevelopment and rehabilitation sites are pre-determined. They cannot simply be moved to another street, city or county, and are therefore at the mercy of State and Federal funding guidelines to be able to compete for funding.

We come now before you to request that Florida Housing please consider either allowing PHA sites to be eligible for the 30% boost through extending FHFC-designated Areas of Opportunity (AOOs) to encompass PHA sites in non-QCT/DDA areas, to allow PHAs to get a 30% boost on sites that are not eligible any other way by reflecting this in the QAP or to reestablish the SAIL set-aside for non-QCT/DDA sites as in the previous Medium/Small Geo RFA.

Sincerely,

Corey G. Mathews, CAE  
Executive Director