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July 1, 2016

Ms. Nancy Muller  
Mr. Ken Reecy  
Florida Housing Finance Corporation  
227 North Bronough Street, Suite 5000  
Tallahassee, FL 32301-1329

**RE: 2016 Areas of Opportunity and RECAP's  
Coalition of Affordable Housing Providers (CAHP) Consensus Items**

Dear Nancy and Ken:

As you are aware, CAHP formed a committee to gather input, suggestions, and ideas from our membership specifically related to Areas of Opportunity and RECAP's. It was our objective to provide final comments to you on these important issues and we had a robust and comprehensive discussion pertaining to these matters.

CAHP concurs with staff's approach and we think you have done an excellent job in ensuring that Florida's programs wind up assisting projects that fit the new paradigms at the federal level. But we have a few small suggestions of how to further ensure that the changes do not have the unintended negative impact of overly limiting site selection opportunities. After extensive discussions, the committee then provided recommendations to the broader membership at our June 23<sup>rd</sup> meeting in Tampa.

CAHP reached consensus on the following items:

- FHFC should change the criteria for 2 Factor and 3 Factor Areas of Opportunity as follows:
  1. Change "Median income greater than the average for the county" to "Median income in at least the 40<sup>th</sup> percentile for the county"
  2. Change "Educational attainment in the top half of the county" to "Educational attainment in at least the 40<sup>th</sup> percentile for the County"
- FHFC should designate Areas of Opportunity in all Counties. There should be no RECAP's in any counties that have no Areas of Opportunity.
- FHFC should not implement a disincentive for census tracts whose "Percent Below Poverty" as shown on the "Florida RECAPs" list is less than 50%.
- FHFC should defer the implementation of any RECAP disincentive for one year.

Thank you,

Nick A. Inamdar  
CAHP Chair

Shawn Wilson  
Committee Chair