



**CATHOLIC
HEALTH
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St. Joseph Residence
Catholic Hospice
Catholic Cemeteries
Centro Mater Child Care Services

May 2, 2019

Ms. Marisa Button
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Housing Financing or the Preservation of Existing
Affordable Multifamily Housing Developments

Dear Ms. Button:

I am writing to request that you consider a small adjustment to the Application Sorting Order for Housing Credit Financing for the Preservation of Existing Affordable Multifamily Housing Developments that would level the playing field for all developments built prior to Hurricane Andrew in 1992. Specifically, I am requesting that you amend the Age of Development Preference to include developments built in 1992 or earlier.

We have 4 communities of this vintage that are in critical need of substantial rehabilitation as they were not built to the more stringent building codes that arose after Hurricane Andrew. As we are entering a heightened period of hurricane activity, it is imperative that these buildings have equal access to tax credits for much needed hurricane-hardening purposes, in addition to preservation of affordable rents.

Over the years, fewer applications have been submitted to Florida Housing in the Preservation RFA, with a total of only 10 applications submitted in RFA 2018-113. We believe this may be due, in part, to the second tie-breaker, Age of Development Preference, with developments originally built in 1988 or earlier having preference above Applications that do not qualify for the preference. Although the year for this tie-breaker changed in the past round (RFA 2018-113) to 1988 from 1986 in the previous two rounds (RFA 2017-114, RFA 2016-116), we believe it should be set at 1992 for the 2019 RFA for the reason stated above.

Your consideration of this request is much appreciated.

Sincerely,

Joseph M. Catania
President and Chief Executive Officer