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May 27, 2020

Marisa Button
Florida Housing Finance Corp
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

via email

Re: *Comments to 2020/2021 Cycle
Proximity Tie Breakers*

Dear Ms. Button:

Thank you again for the opportunity to participate in the development of the 2020/2021 HC RFAs.

We have already voiced our opposition to the proposed changes to proximity scoring which we believe will have the unintended negative consequences of unnecessarily limiting viable sites and driving up land cost.

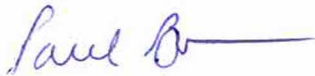
The same applies to the use of proximity points as tie breakers. Using the two highest actual Community Services scores as a tie breaker does not make sense: a site that scores for instance 3.5 for every Service item plus 6 for Transit (27 points) would be bypassed by a lower scoring site that just happened to have two Service scores of 3.5 and 4 points.

In addition, for Large Counties including Miami-Dade, the proposed change to use the actual Transit Score as a tie breaker would effectively result in only sites with a 6 point transit score standing a chance.

We believe such tie breakers are too restrictive.

We appreciate your consideration.

Sincerely,



Paul Bilton
786-399-4210