



Rural Development

January 31, 2014

Florida/Virgin Islands
Multi-Family
Housing Programs

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Mr. Ken Reecy
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Comments on Draft Preservation RFA 2014-104

Dear Mr. Reecy:

It has come to our attention that there have been some proposed changes to the way applications for the 2014 Preservation RFA will be scored. Specifically, there will be scoring changes that will provide points for the proximity of projects to transportation, and for the services provided at these properties. In Florida there are over four hundred Multi-Family Housing properties that were funded by Rural Development. The majority of these are located in small towns and rural areas that do not have access to a close source of public transportation. Similarly, USDA Rural Development regulations do not allow for the management companies to include costs in their budgets for resident programs. With these issues in mind, it is our opinion that the proposed changes will adversely affect applications from most Rural Development property owners and indirectly have an effect on the overall condition of these properties.

A large number of the properties financed by Rural Development are reaching an age where major renovations and upgrades are needed. The State Tax Credit and loan programs provide an essential source of financial assistance that is available to property owners. To place the proposed restrictive elements in the competitive application process will definitely impact Rural Development property owners and the tenants that they provide housing for.

We ask that you reconsider adding the proposed changes, but if they are included, allow for some consideration for Rural Development properties by exempting them and giving them points. This would apply to both the transit requirement and the resident services. One final thought would be to clarify the funding goal for both Rural Development Elderly and Family projects.

Thank you for considering these comments to this draft Preservation RFA. If you have any questions or need additional information please contact me at your convenience at (352) 338-3464.

Sincerely,

Nigel D. Parish
Multi-Family Housing Program Director

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