



RURAL NEIGHBORHOODS
"Affordable Housing for Working Families"
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February 4th, 2016

Mr. Steven Auger
Florida Housing Finance Corporation
227 North Bronough Street
Suite 5000
Tallahassee, Florida 32310

Re: RFA 2016-104 SAIL Funding to Preserve Farmworker/Commercial Fishing Worker Housing

Dear Mr. Auger:

Rural Neighborhoods recommends the following changes to the proposed rule for RFA 2016-104 providing Sail Funding to Preserve Farmworker/Commercial Fishing Worker Housing:

The proposed rule restricts eligible projects to those that have received an award of funding from the Corporation through an application submitted in 1988 or earlier under either the SAIL Program or the HOME Investment Partnership program. I recommend that this be amended as follows:

- That "1999 or earlier" be changed to "**2001 or earlier.**" In RFP 2014-117 a similar acquisition/rehabilitation pool was also restricted to 1999 or earlier. This change in date would increase the pool of properties eligible for the RFA and moves the date forward commensurate with the time that has elapsed since the prior RFA.
- That the maximum amount of funds permitted to be awarded under the program to be increased from \$30,000 per unit to **\$40,000 per unit** and the total amount per project be increased from \$2,250,000 to **\$3,200,000**. RN believes the preservation to be achieved be comprehensive and that rehabilitation address all systems identified by a capital needs assessment to have a remaining useful life of 5 years or less. RN experience in addressing the needs of similar properties finds substantial hard cost construction costs (only) to frequently be in excess of \$30,000 per unit. It is our recommendation that the rehabilitation that results from RFA 2016-114 be sufficient to meet the expected initial HOME affordability period.

Thank you for your consideration.

Sincerely,



Steven Kirk
President