From: Ryan von Weller <rvonweller@wendovergroup.com>
Date: September 13, 2016 at 2:07:23 PM EDT
To: steve.auger@floridahousing.org, Ken Reecy <Ken.Reecy@floridahousing.org>, Nancy Muller <nancy.muller@floridahousing.org>
Subject: RFA Comments

Please see the following comments for RFA 2016-110 and RFA 2016-113:

Mandatory Distance Requirement
While I understand the logic behind keeping some variation of the Mandatory Distance Requirements (MDR) in place, the following does not make sense to me. On page 29 of RFA 2016-110, this passage seemingly allows for an application to be eligible for funding as long as the Financial Beneficiaries of that application are the same as the development creating the MDR on the List:

An Applicant may disregard any Development(s) on the List if the proposed Development and any Development(s) on the List have one or more of the same Financial Beneficiaries and meet at least one (1) of the following criteria: (i) they are contiguous or are divided by a street, and/or (ii) they are divided by a prior phase of the proposed Development. If this provision applies to the proposed Development, the Applicant must identify (at question 6.d. of Exhibit A) the Development(s) on the List that it wishes to disregard.

Therefore, it is my understanding that a developer could build a second, unphased development right next to an existing project on the Development Proximity List as long as the above criteria is met. So if they can build right next door to a development on the List, why can't the same Financial Beneficiary build elsewhere within the MDR? If this is truly the case, I suggest that the MDR should be disregarded completely if the same Financial Beneficiaries from the project creating the MDR have another site they would like to develop within that same MDR.

A/B Leveraging
Why is the A/B leveraging split climbing annually? It started at 90/10, then to 85/15, now to 80/20. This is a pretty rapid change over a relatively short period of time. What is the logic behind this change?

RECAP
I believe it was discussed previously that a development would potentially be eligible for funding, even if in a RECAP, as long as it had a PHA as a partner in the transaction. I see that in RFA 2016-113, applications in a RECAP are eligible for funding as long as the development gets the Local Government Area of Opportunity Funding, but no such provision is made in RFA 2016-110. I understand that there is no Local Government Area of Opportunity Funding for Small and Medium Counties, but there are Medium County PHA's with sites in RECAP areas that should also receive the same exclusion.

Thank you.
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