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Sent: Monday, June 1, 2020 12:38 PM

To: Marisa Button <Marisa.Button@floridahousing.org>

Cc: Justin Corder <jcorder@norstarus.com>

Subject: Norstar Development comments regarding the 2020/2021 RFA Funding Cycle

Marisa,

Thanks for having the third workshop last week. We were unable to get through to make a comment toward the end of the call, so I'm sending our comments here.

1. Ability to Proceed. We echo the comments we heard from several other developers about the Site Plan Approval form and the barriers to obtaining a fully approved site plan prior to the application deadline. We have obtained full site plan approval in past cycles, and we agree that various jurisdictions differ greatly on their requirements for these types of approvals. They also differ in the duration of said approvals. If FHFC chooses to keep the 5 points for a fully approved site plan in the RFAs, we recommend that all engineering and plan submittal/review fees paid during predevelopment be treated as reimbursable project expenses (as opposed to the way HC application fees are treated).
2. LGAO
 - a. Sit-Out Period. In the 2019 Medium County Geo RFA, three counties (Alachua, Manatee, Polk) were listed as ineligible to compete for the LGAO funding goal. Which counties will be ineligible to compete for this year's goal?
 - b. Land contribution. In the 2019 Medium County Geo RFA, land contributed to an applicant did not qualify as LGAO funding. Will a land contribution qualify as LGAO in this year's cycle? This would be separate from the point item involving a local government deed or ground lease.
3. Proximity. We support the idea of using proximity scoring to help move away from the lottery system. However, as you know, many of our PHA partners do not have the ability to select new sites for their developments and/or redevelopments, which means their ability to compete on the basis of proximity is somewhat limited. In past cycles, the PHA point boost could mitigate this disadvantage somewhat. In the RFA workshop agenda, a 0.5 point PHA boost is shown in the chart for transit service points, but not for total proximity points. We have not yet scored our existing sites to compare the effect of the new PHA point boost to the effect of the previous 3-point PHA boost, but we are hopeful it will be as helpful/meaningful as the previous boost. What was the methodology or rationale for utilizing this 0.5 point boost?

Thank you,

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