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**Subject:** FHFC 2020-21 RFA Cycle

Marisa – thank you for the opportunity to provide public comment regarding the above referenced. Following are comments regarding the agenda to the May 29, 2020 workshop:

- 1) Ability to Proceed/Site Control – We do not see a public purpose/benefit in connection with the proposed 5 point award for “**Applications that include a deed or an executed lease with a Local Government for at least 50 years...**” This form of site control does not make for a better development. If FHFC’s goal is to reduce the number of closing extensions to funded developments (whether 9% HC, SAIL, etc.), FHFC is addressing this with the introduction of 15 developer experience points for related applications with no more than 1 exchange of HC or a 2<sup>nd</sup> extension of an FHFC deadline. This 15 point developer experience award is plenty of incentive to close on time. Introducing a deed or 50-year local government ground lease to document site control will primarily benefit those who already own property or have said ground leases. Further, it rewards spending unnecessary and substantial resources to buy property without resulting in a better development.
- 2) Related Applications – in addition to the provisions in the agenda, we suggest (i) adding language describing the duties/responsibilities of Applicants, Developers & Related Parties and (ii) prohibiting Applicants, Developers & Related Parties from subcontracting or assigning their duties/responsibilities to others. The duties/responsibilities included in the RFA’s with Priority I designations would include selecting/procuring sites and contracting for the same, obtaining all materials/forms/financing letters required for the submission of applications to FHFC, as well as the typical pre-development and development activities related to bringing a project to fruition. Language should also be added to the applicant certification whereby each applicant certifies it complies with said prohibition. This addition will provide FHFC and competitors with a tool to disqualify/challenge applicants before FHFC awards funding.

Thank you in advance for your consideration.

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