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Sent: Monday, May 11, 2020 3:35 PM

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

Cc: Todd Wind <twind@timsheldevelopment.com>

Subject: Suggestions for Upcoming RFAs

Marissa,

Thank you so much for the opportunity to provide comments to the RFA process.

Timshel Development Group would like to echo the RFA comments submitted by Oscar Sol on April 24, 2020. We believe that the self-selection "Priority" system, combined with revisions to the rule and/or RFA to prevent exploitation (see our public comment on April 24th), will be an extremely productive step towards reducing the number of applications and increasing the quality of proposed developments. In addition, we believe the quintile proximity system and the proposed addition of community services are unnecessary changes that will create unintended consequences as detailed in Oscar's comment.

We also agree that offering points for site plan approval will create an unintentional and unfair disadvantage to jurisdictions that require more detailed and costly site plan reviews. In addition, when coupled with a priority system, it is likely that many developers will purposefully avoid looking at properties in jurisdictions with more stringent site plan approval requirements.

Timshel Development Group encourages Florida Housing to further refine the priority application system to avoid manipulation and also to consider an expansion of goals, rather than implementing the changes to proximity that are currently being considered. Rather than allowing applications to be funded in a "general pool" after the goals are satisfied, we would encourage an expansion of the goals so that all awarded applications are funded under a goal. In addition to the Revitalization, LGAO, GAO Family and Small County goals that existed in the 2019-113 RFA, we have provided some other goal options below. We would also encourage the consideration of allowing each developer to assign only one of their Priority I applications to each goal.

- Counties that have not received a HC development in the last three RFA cycles
- Areas with a high number of local jobs (see Georgia DCAs QAP regarding "Workforce Housing Need and Job Strength" as an example)
- Developments in school districts with high-performing schools (see Georgia DCAs QAP regarding "Quality Education Areas" as an example)

Thank you, Marissa.



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