

From: Kenneth Naylor <knaylor@apcommunities.com>
Sent: Wednesday, March 16, 2022 10:05:59 AM
To: Marisa Button <Marisa.Button@floridahousing.org>
Cc: Hana Eskra <hana.eskra@maraispartners.com>; Steve Auger <steve.auger@birdsonghousing.com>
Subject: CAHP comments regarding Rule changes

Good morning Marisa,

Below please find recommendations from CAHP regarding the proposed draft rules:

Subcontractor Self-Performance:

Ensure that no General Contractor shall self-perform more than ten percent (10%) of the actual costs of any construction or inspection work that is normally performed by subcontractors. Self-performed work must either (1) result in a verifiable cost savings to the project; or (2) have an aggregate cost of less than \$50,000. The General Contractor's mark-up on any self-performed work shall be limited to a maximum of ten percent (10%) of the actual construction costs of the self-performed work. The General Contractor shall maintain and submit documentation to establish the cost savings and the actual cost of the self-performed work which shall be verified in the GC Cost Certification.

Principal Disclosure:

- Require a natural person to be listed by the 7th level for both competitive and non-competitive funds
- Exclude stockholders of regulated companies like publicly traded companies, REITs, and pension funds

Thanks for the opportunity to comment. Please let us know if you have any questions.

Best,

Ken Naylor
Atlantic Pacific Communities, LLC