

To: David Wescott, Nicole Gibson & Jean Salmonsens

SUBJECT: Comments for RFA 2024-305 Community Development Block Grant-Disaster Recovery (CDBG-DR) Financing For Affordable Housing Developments Located In Hurricane Sally Impacted Areas

Thank you for the opportunity to provide comments for this RFA. I have two comments to proffer:

From the RFA:

**General Contractor Experience**

- (a) Required General Contractor Experience for all Developments The General Contractor or qualifying agent of the General Contractor identified in the Application must have all of the following:
- Must have the requisite skills, experience and credit worthiness to successfully produce the units proposed;
  - Must construct the proposed Development in accordance with the design plans and specifications as prepared by the licensed Architect;
  - Must not have allowed required insurance to lapse and/or had insurance force-placed by a lender on any Florida Housing Development funded within the past five years;
  - Must not be a General Contractor on a Development that was awarded HOME funding from any RFA issued by the Corporation in 2017 or earlier that has not had the final draw of HOME funds by Application Deadline;
  - Must have been the General Contractor on the completion\* of at least two developments, where each Development consists of a total number of units of no less than 50 percent of the total number of units in the proposed Development; and
  - Either (i) must have Davis-Bacon experience using federal funding in at least one project\*\*; or (ii) at least one of the completed developments described in (b) below must have been subject to Davis Bacon Requirements.

(b) To demonstrate these requirements have been met, complete the prior experience chart which contains the following information for each of the completed\* developments and, if applicable, experience using federal funding in at least one project\*\*

\*Completion means the certificate of occupancy has been issued for at least one building.

\*\*Experience with using any federal funding that includes Davis-Bacon Requirements such as CDBG funding on an infrastructure project.

**1. Request to have this experience requirement provided during credit underwriting:**

In the procuring of development partners PHAs typically require their developer partner have an open, competitive bid process to ensure that construction pricing is competitive and reasonable. Please consider having the GC experience provided during credit underwriting as construction bidding won't happen until plans are nearer to completion. Including this as part of the application would require a PHA application to either (a) submit a placeholder General Contractor or (b) go out for bids well before the plans are in anything close to final form.

From the RFA:

SECTION ONE A. CDBG-DR Funding Florida Housing Finance Corporation (the Corporation) expects to offer an estimated \$23,750,000 in funding for this RFA. \$19,000,000 is expected to be awarded to HUD-Designated MIDs. At least \$4,750,000 is expected to be awarded to State-Designated MIDs.

**2. Request to increase the funding for the State-Designated MIDs:**

Please consider adding up to \$2,250,000 in additional funding, such as SAIL program income, to the State-Designated MIDs funding to allow for the maximum funding to be \$7,000,000 and be aligned with the other funding for the counties in the disaster area. There is no apparent difference in construction cost throughout the panhandle so the lower amount may not be enough to fund a priority application.

Thank you for considering these requests.

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