RASHED ASSOCIATES

Memorandum

To: Ms. Vickie Robinson, Ms. Nancy Muller
From: Haazim Rashed
CC: Mr. Steve Auger
Date: July 26, 2007
Re: July 27, 2007 Public Hearing Comments

I regret that I will not be able to attend the scheduled Public Hearing regarding the 2008 Universal Cycle, July 27, 2007. There are issues related to the agenda items you present that should be considered. By this memo I hope that my comments may be noted for follow up at future Public Hearings.

Issues and Comments

2. Mixed Income

Should Florida Housing tweak the Application to be more accommodating to mixed income developments?
I am not sure but I do have a concern. The problem with increasing mixed income projects is scale. Unless there is a trade off in location for mixed income the proximity issues will force higher base land costs for non subsidized units and may affect market unit profitability. Absent a way to maintain site cost comparability to non Housing Tax Credit sites, I would not support the tweaking.

5 Deberry Court
Sacramento, CA 95835

Phone: 916-515-1400
Fax: 208-439-0427
Email: rashedhf@gmail.com

a. SAIL per unit request limit based on set-aside units rather than total units?
Yes, the set aside units should be the basis for requests.

b. Eliminate 3 points for 70% set-aside?
Yes, since SAIL is a subsidy for affordable units at up to 80% AMI and exceptions as high as 120% AMI, its presence in Housing Tax Credit Projects should not merit an additional point consideration.

3. Ranking
a. Ranking order
No comment.

b. SAIL leveraging tie-breaker-
Yes, please keep this incentive, because it encourages more leveraging of SAIL subsidies and more total affordable, not necessarily HTC eligible, housing unit creation

4. Public Housing Authorities (PHAs)

a. Should Florida Housing award automatic 7.5 proximity points to PHAs for developments on existing Public Housing sites?
Yes, reuse of existing PHA sites is a national and local priority and should be supported by the State of Florida programs. A key requirement should be that the proposed developments be mixed income.

b. Local Government contributions must be from City or County.
If entities like PHAs are considered as governmental entities, I agree, if otherwise, the definition of local government should be expanded.

5. HC Special Set-Asides
a. Should the Front Porch Florida Community set-aside be discontinued?

Yes, if it can increase the preservation set aside.
b. If so, should the Preservation set-aside be increased to $5 million?
Yes, preservation is a local and national priority that should be supported.

6. Extremely Low Income (ELI) Set-Aside
Florida Housing will have an estimated $25 million available for ELI units ($15 million appropriation plus $10 to $12 million returned SAIL funds). Should these funds be used as Supplemental Loan funding in the 2008 Universal Cycle or awarded through a separate funding cycle?
These funds should be used in the 2008 Universal Cycle to increase availability of ELI units with HTC subsidies as well.

7. Site Plan and Zoning
Evidence of site plan and zoning approval will be threshold requirements rather than point items.
This may increase pre approval development expenditures, depending on location and may be an impediment to not for profit or smaller developers. It will favor locations already having the appropriate zoning.

8. Funding Sources / Caps
a. Should the Housing Credit limits be adjusted?
No Comment.

b. Should the Housing Credit limit for Preservation developments be adjusted?
No Comment.

c. Should the SAIL limits be decreased?
No Comment.

d. If ELI is funded through the Universal Cycle, should the Supplemental

Loan per unit amount be adjusted?
No Comment.

9. HC Non-Profit Goal
Should the goal be increased?
Yes, based on other state set asides 20-25% for Non-profit goals would be in the range of acceptability. Non-profits typically focus on lower income residents and would assist in the increased ELI emphasis.

10. HOME Program
Status of HOME-Rental Program
No Comment.

11. Statewide Housing Locator System
How should Florida Housing ensure participation in this web-based program?
No Comment.

12. Tentative 2008 Universal Cycle Time Line
No Comment.

13. Other Changes
What other changes should be considered?
Last year's change in reserve allowances should be reviewed for its impact on project's ability to secure tax credits. Reserve questions can affect the ability of projects to be syndicated.