

**From:** Scott Culp  
**Sent:** Monday, January 14, 2008 9:24 AM  
**To:** steve.auger@floridahousing.org  
**Cc:** Debbie Blinderman  
**Subject:** Miami-Dade County Limit

**Attachments:** Picture (Metafile); SAIL Distribution Limit.doc; Picture (Metafile); Picture (Metafile)

We appreciate the opportunity for further dialogue with regard to the "Miami-Dade County Limit" in the SAIL Provisions of the Application and Selection Order found on page 99 of the 01/02/08 draft of the 2008 Universal Application Instructions.

As I know you are aware, Miami-Dade County implemented ss ch. 83-220, which allows them to opt out of the additional 10 cent tax increase in the documentary stamp tax.

As a result, in accordance with ss 201.0205, "Each county and each eligible jurisdiction within such county shall not be eligible to participate in **programs** funded pursuant to s. 201.15(9).

**Programs** funded pursuant to ss 201.15(9) represent 77.6689% of the State Housing Trust Fund appropriations, leaving 22.3311% of the State Housing Trust Fund appropriations available for **programs** that Miami-Dade can *participate* in. It is worth noting that this 22.3311% is not Miami-Dade's share nor Miami-Dade's contribution to the State Housing Trust Fund, rather it is State Housing Trust Fund dollars contributed by counties throughout the State in accordance with ss 201.15(10).

Miami-Dade is limited by ss 201.0205, in ALL programs funded by State Housing Trust Fund appropriations, to 22.3311% of those funds. This includes the 2008 Elderly Housing Community Loan, the 2008 SAIL Farmworker/Fishing Worker RFP, AND the Predevelopment Loan Program.

In accordance with the SAIL legislation, ss 420.5087, "(SAIL) **Program** funds **shall be distributed** ... in a manner that meets the need and demand for very-low-income housing throughout the state. That need and demand **must** be determined by using the most recent statewide low-income rental housing market studies available ..."

The most recent statewide low-income rental housing market studies indicate that Miami-Dade County has 19.2% of the State's low income cost burdened renter households. Therefore, 19.2% (ss 420.5087(1)) of 22.33% (ss 201.0205) equals a "Miami-Dade County Limit" of 4.2873% of the total SAIL funds available.

The most recent statewide low-income rental housing market studies indicate that Miami-Dade County has 30.93% of the Large County low income cost

burdened renter households. Therefore, 30.93% (ss 420.5087(1)) of 22.33% (ss 201.0205) equals a "Miami-Dade County Limit" of 6.91% of the Large County Geographic SAIL funds available.

The most reasonable interpretation of the governing statutes provides for a "Miami-Dade County Limit" of 6.91% of the total Large Geographic Set-Aside as identified below;

Shimberg Rental Market Study - 2007		
Large County Cost Burdened Renter Households by County		
County	Shimberg Need Study 2007	
Miami-Dade	107300	30.93%
Broward	60489	17.44%
Orange	40484	11.67%
Palm Beach	39318	11.34%
Hillsborough	38942	11.23%
Pinellas	34819	10.04%
Duval	25509	7.35%
	346861	100%

Proposed Large County SAIL Limits			
SHTF Limit per Statute *	Shimberg Need 2007	SAIL Limit per Statute **	% of Large County need exclusive of Miami Dade
22.33%	30.93%	6.91%	
		23.51%	23.51%
		15.73%	15.73%
		15.28%	15.28%
		15.13%	15.13%
		13.53%	13.53%
		9.91%	9.91%
		100.00%	93.09%

\* ss 201.0205

\*\* ss 420.5087(1)

These limits are very easily implemented through a revision to the Ranking and Selection Criteria as recommended in the enclosed attachment.



SAIL Distribution Limit.doc (9...

*see pg. 4*

The current 22% Miami-Dade County Limit, combined with the other provisions of the Ranking and Selection Criteria in the 2008 Application, is substantially equivalent to a system that would have a reasonably foreseeable high probability of granting Hillsborough County 100% of the total SAIL funds. We respectfully request revisions to the 2008 Universal Cycle Application that provide a more reasonable interpretation and implementation of the governing statutes.

W. Scott Culp  
Executive Vice President



Please Note:

**My contact information has changed. The new contact information is:**

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**RANKING AND SELECTION CRITERIA**

- B. Applications for MMRB, SAIL and/or Competitive HC
- 7. Program Provisions and Application Selection Order
  - c. SAIL Provisions

(5). Distribution of SAIL funds;

No more than the Large County SAIL Limit percentage identified in the table below, of the portion of the SAIL funding available for the Large County Geographic Set-Aside will be awarded to any one Large County. If selecting the highest ranked Application for tentative funding would result in exceeding this limit, that Application would not be selected and the next highest ranked Application in any County that would not exceed this limit would be selected for tentative funding. However, if there are no eligible Applications in the Large County Geographic Set-Aside other than the Applications in a county that would result in exceeding this limit, the limit will no longer be considered and the highest ranked Application with the Large County Geographic Set-Aside will be selected for tentative funding.

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