March 3, 2020

Mr. Trey Price & Ms. Marisa Button
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

Re: Public Comments on the 2020 Rule Development Process

Dear Mr. Price and Ms. Button:

Thank you for the opportunity to comment on the 2020 Qualified Allocation Plan.

The February 25th 2020 draft QAP outlines the Corporation’s priorities and selections criteria. Specifically, the QAP indicates that preference will be given to developments serving the lowest-income tenants when allocating Housing Credits.

It’s unquestionable that Extremely Low-Income households units are severely underserved across the state. Under the geographic 9% Housing Credit RFAs, the Corporation has historically required applicants are to set-aside a minimum 10% of the units (15% if selecting the Average Income Test) for Extremely Low-income (ELI) households to meet the minimum threshold eligibility requirements of the geographic RFAs. There is no further prescribed preference or incentive for applicants to increase the level of ELI units above the minimum eligibility threshold.

We encourage the Corporation to consider providing a preference to applicants who agree to set-aside more than the threshold 10%/15% ELI set-aside by applying their discretionary basis boost authority. The preference would correspondingly provide applicants who take on the burden of additional ELI units the incentive of a higher maximum Housing Credit request, consistent with the discretionary basis boost applied to developments located in Geographic Areas of Opportunity (GAO).

We commend the Corporation’s current use of their discretionary basis boost authority for developments located within the defined Geographic Areas of Opportunity. The GAO basis boost, as well as the various RFA goals for developments located in GAOs, upholds the QAP’s intent to utilize “project location” with the selection criteria for Housing Credit allocation. Similarly, we believe the implementation of an ELI basis boost is good public policy; it directly benefits the state’s lowest-income population in accordance with the stipulated preferences of the 2020 QAP.

Intentionally, we are not recommending a specific percentage, or number, of ELI set-aside units necessary to secure the Corporation’s discretionary basis boost. This public comment is intended to open the floor for the Corporation and stakeholders to consider and opinie. Nevertheless, I would be pleased to discuss my specific thoughts in more detail at your convenience.

Regards,

Chris Shear

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