

THE HENDRICKSON COMPANY

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November 14, 2013

Mr. Steve Auger,
Executive Director,
Florida Housing Finance Corporation
Tallahassee, Florida 32301

Re: Comments on Proposed SAIL RFA

Dear Mr. Auger:

I am writing this comment on behalf of the Florida Association of Local Housing Finance Authorities (Florida ALHFA) as its Executive Director. First, Florida ALHFA wishes to again thank you for your cooperation over the years as a true partner in our common mission. We are deeply appreciative.

1. Timing of Application for Non-Competitive Housing Credits:

The suggested requirement that the submission of an application for Non-Competitive Housing Credits be submitted within 10 days of Credit Underwriting invitation causes problems with the existing system. The system contemplates that developments financed with local HFA bonds have a different process for applying for the 4% HC, a centerpiece of which is the submission of a completed credit underwriting report with the application. The suggested requirement is clearly at odds with that approach.

We are appreciative that you and staff have reached out to discuss potential solutions to this. We are ready to work with staff to help design a system wherein applicants for SAIL using local HFA bond financing continue to be able to utilize the current system, but also are required to move through the process in an expeditious manner. We look forward to this discussion.

2. Local Government Contributions—Bonds Counted as Contribution:

The use of local HFA tax exempt bonds should be counted as a “local government contribution”. This is consistent with past HFA practice. A methodology for calculation of the value of the contribution needs to be established, and we would be happy to work with staff on this.

3. Local Government Contributions—HFA Signature Permitted

When a contribution comes from a local HFA, the HFA Chair should be able to sign the FHFC form. This is for any contribution coming from the HFA, be it loans, grants, or bonds.

The HFA's operate with some level of financial independence. When they choose to utilize their resources to make a grant or below market loan to an applicant, they are the body that is making the decision to provide the local government contribution and they are the body that is calculating the value of the contribution. Asking a Mayor or County Manager to sign a form is inappropriate when the money is coming from the HFA.

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,



Mark Hendrickson
Executive Director
Florida Association of Local Housing Finance Authorities