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Date: September 1, 2016 at 3:39:36 PM EDT
To: "Ken Reecy (Ken.Reecy@floridahousing.org)" <Ken.Reecy@floridahousing.org>
Cc: Nick Inamdarn <inamdarn@gatehousemgmt.com>
Subject: SAIL RFA

Hi Ken:

I chaired the CAHP subcommittee meeting this morning regarding the 8-24-16 draft SAIL RFA. There was lengthy discussion regarding many items but we agreed to submit comments on only 3 items where the subcommittee was aligned. Keep in mind these comments are only from the subcommittee and not the full CAHP organization. We do not have time to meet with the full CAHP membership and provide FHFC comments in a timely manner before the 9-16-16 FHFC Board meeting. It is our understanding the FHFC Board will approve the SAIL RFA at the 9-16-16 meeting.

Link Units:

There appears to be a lot of unanswered questions regarding the nuts and bolts of the new program guidelines. What does it mean that the 30 day period begins when ready for occupancy. I believe that may mean the date the unit is placed in service, which is definable. How does a multiple building development work? Are all units held 30 days from the first building PIS date or each building? Does each building have to have Link units? If a building with Link units passes 30 days without a lease agreement, does that unit get transferred to the next building and remain open 30 days? Could an open Link unit prevent a building at year end from being qualified to deliver credits that year? These are just a few examples of questions that remain unclear to the subcommittee and really require further technical discussion with staff vs trying to decipher all of this via email. We would be happy to discuss anytime you like in the coming days.

5 Units per Building Requirement

It is our understanding the SAIL Rule requiring a minimum of 5 units per building has been eliminated. If that is correct, should that requirement be removed from the RFA or is that minimum still required?

SAIL Funding Limits

CAHP previously suggested 6.5MM for wood frame jobs and 8MM for concrete jobs. FHFC instead is allocating 6MM to small/medium counties and 7MM to large counties. We would kindly ask FHFC to consider this again as an allocation of subsidy based on construction cost is an important factor, albeit we understand many factors go into subsidy limits.

Thank you kindly for considering above.

David Deutch
CAHP SAIL Subcommittee Chair