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Sent: Tuesday, March 27, 2018 2:56:38 PM
To: Trey Price; Marisa Button
Subject: 9% LIHTC Gap Assistance

URGENT 9% LIHTC Awardees Gap Assistance Needed:

As I indicated in my public comments at the Rule Development Workshop on March 26th, I believe we are at the precipice of an unprecedented significant financial crisis for the 9% HC Awards from the past 24 months that have not yet closed their LIHTC Syndications.

We are all becoming painfully aware that the decrease in LIHTC syndication pricing resulting from the Federal Tax Reform, and the significant construction costs increases experienced in the last 24 months, have created an economic strain on the financial viability of these affordable housing developments.

Those 9% LIHTC applications that were sized efficiently to match the available 9% LIHTC allocations to the development's eligible basis are now finding themselves in the unfortunate position of significant excess eligible basis and reduced resources from potential LIHTC syndication.

Although I am confident that some of these developments will have adequate LIHTC allocation when evaluated at Credit Underwriting, many will be seriously under sourced.

As we rapidly approach new RFA's for additional future allocations of 9% LIHTC that can be efficiently sized to account for this unprecedented "perfect storm" of unique events, – (*rapid decrease in LIHTC syndication pricing as a result of Federal Tax Reform and extremely rapid increase in construction costs resulting from the demand created by construction volume from multiple hurricane recovery efforts, lumber tariffs and significantly increased market rate multi-family construction volume*) - we need to consider a revision to the QAP to allow FHFC to allocate additional 9% LIHTC to those awardees that are identified in Credit Underwriting as having excess eligible basis and insufficient 9% LIHTC allocation.

I believe such a 9% LIHTC Gap Assistance program could be administered efficiently by the Credit Underwriters with parameters provided by and managed by FHFC.

I believe that the 9% LIHTC Awardees requesting this Gap Assistance should be held to the TDC requirements and any resulting Developer Fee reductions that were the requirements of each respective RFA.

In addition, I believe each 9% LIHTC Awardee requesting this Gap Assistance should be required to defer a minimum of 50% of their TDC adjusted Developer Fee as has been the policy with the recent Development Viability Loan Program.

This issue is extremely time sensitive and critical. With Federal Legislation that is providing additional 9% LIHTC to the States, there is an opportunity to use this additional allocation for the proposed 9% LIHTC Gap Assistance program.

Utilizing this recommended 9% LIHTC Gap Assistance Program for economically strained 9% LIHTC Awardees, the limited FHFC resources could be reserved for the MMRB/SAIL and MMRB/HOME Awardees that have similar constraints.

Please consider a proposed revision to the QAP that would allow FHFC to restore the economic viability and sustainability of these much needed affordable housing developments.

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Application #	RFA #	RFA Description	Development Name	Applicant Name	County Name	County Size	Demographic	Total Units	9% HC Allocation
2015-088C	2014-114	Medium Small County Geo	Denton Cove	Denton Cove, Ltd.	Franklin	Small	Family	52	\$ 49,953
2017-285V	2014-115	Large County Geo	Delmar Terrace South	Delmar Terrace Developers, LLC ; Boley Centers, Inc	Pinellas	Large	Homeless	65	\$ 1,660,000
2016-008CS	2015-106	Medium Small County Geo	Woodland Park Phase I	Woodland Park Redevelopment I, LLC	Alachua	Medium	Family	96	\$ 1,155,000
2016-093C	2015-106	Medium Small County Geo	Brownsville Manor	Brownsville Manor, LP	Escambia	Medium	Elderly	88	\$ 1,510,000
2017-289V	2015-106	Medium Small County Geo	The Pines	Roundstone Development, LLC.	Volusia	Medium	Family	100	\$ 1,510,000
2017-290V	2015-106	Medium Small County Geo	Redding Redevelopment	Sanford Redevelopment Partners, LLC; SHA Development, LLC	Seminole	Medium	Elderly (Non-ALF)	90	\$ 1,510,000
2016-137C	2015-107	Six-Large County Geo	Laburnum Gardens	SP Gardens, LLC	Hillsborough	Large	Elderly	81	\$ 1,420,000
2016-252C	2015-108	Miami-Dade Geo	Jasmine, The	Jasmine Housing, Ltd.	Miami-Dade	Large	Elderly	96	\$ 2,397,397
2016-281C	2015-111	Preservation	Isles of Pahokee Phase II	Isles of Pahokee II, LLC	Palm Beach	Large	Elderly	129	\$ 1,209,190
2016-290C	2015-111	Preservation	Lummus Park Manor	SP Manor LLC	Miami-Dade	Large	Elderly	51	\$ 500,000
2016-293C	2015-111	Preservation	Pineda Village	Cocoa Housing Preservation II, LLC	Brevard	Medium	Family	144	\$ 1,350,000
2017-283CS	2015-113	Local Revitalization	Amelia Court at Creative Village	Amelia Court at Creative Village Partners, Ltd.	Orange	Large	Family	116	\$ 2,185,789
2017-287V	2016-102	Homeless	VILLAGE ON MERCY	ABILITY HOUSING, INC. (f/k/a ABILITY HOUSING OF NORTHEAST FLORIDA, INC.)	Orange	Large	Homeless	166	\$ 2,110,000
2016-333CL	2016-103	High-Priority PDC	Dr. Alice Moore Apartments	Dr. Alice Moore Apartments, LLLP	Palm Beach	Large	Persons w/ Disabilities	36	\$ 820,000
2017-291V*	2016-103	High-Priority PDC	The Residences at Equality Park	Carrfour Supportive Housing, Inc	Broward	Large	Persons with a Disabling Condition	48	\$ 1,092,894
2017-002C	2016-110	Medium Small County Geo	Silver Pointe	Silver Pointe Development Partners, LLC	Marion	Medium	Family	90	\$ 1,400,000
2017-016C	2016-110	Medium Small County Geo	Luna Trails	HTG Luna, LLC	Brevard	Medium	Elderly	86	\$ 1,510,000
2017-018C	2016-110	Medium Small County Geo	Hammock Ridge II	HTG Hammock Ridge II, LLC	Hernando	Medium	Elderly	92	\$ 1,435,550
2017-034C	2016-110	Medium Small County Geo	Banyan Cove	BDG Banyan Cove, LP	Volusia	Medium	Elderly	100	\$ 1,510,000
2017-035C	2016-110	Medium Small County Geo	Los Altos Apartments	Osceola Los Altos, Ltd.	Osceola	Medium	Family	100	\$ 1,510,000
2017-081C	2016-110	Medium Small County Geo	Ridgewood Apartments	Ridgewood Affordable LLC	Polk	Medium	Family	33	\$ 330,000
2017-096C	2016-110	Medium Small County Geo	Amaryllis Park Place	Amaryllis Park Place Development Partners, LLC	Sarasota	Medium	Elderly	84	\$ 1,510,000
2017-100C	2016-110	Medium Small County Geo	Suwannee Pointe	Suwannee Pointe, LP	Suwannee	Medium	Family	36	\$ 477,091
2017-102C	2016-110	Medium Small County Geo	Cassie Gardens	Cassie Gardens, Ltd.	Clay	Medium	Elderly	96	\$ 1,479,357
2017-104C	2016-110	Medium Small County Geo	Carter Crossing fka Bronwyn Landing	Bronwyn Landing, Ltd.	Santa Rosa	Medium	Elderly	93	\$ 1,386,742
2017-168CS	2016-112	SAIL Workforce	Quarry, The	Quarry Big Coppitt, Ltd.	Monroe	Small	Workforce	96	\$ 898,985
2017-200C	2016-113	Six-Large County Geo	Parramore Oaks	Parramore Oaks, LLC	Orange	Large	Family	120	\$ 2,110,000
2017-211C	2016-113	Six-Large County Geo	Pinnacle at Peacefield	Pinnacle at Peacefield Ltd.	Broward	Large	Elderly	120	\$ 2,561,000
2017-212C	2016-113	Six-Large County Geo	Preserve at Sabal Park	Blue Broadway, LLC	Hillsborough	Large	Family	144	\$ 2,110,000
2017-229C	2016-113	Six-Large County Geo	Georgian Gardens Apartments	Georgian Gardens Apartments, LLC	Palm Beach	Large	Elderly	87	\$ 1,650,000
2017-232C	2016-113	Six-Large County Geo	Madison Point	Madison Point, LLC	Pinellas	Large	Elderly	80	\$ 1,660,000
2017-235C	2016-113	Six-Large County Geo	Lofts at Monroe fka Lofts at LaVilla on Monroe	Lofts at LaVilla on Monroe, Ltd.	Duval	Large	Family	108	\$ 1,660,000
2017-241C	2016-113	Six-Large County Geo	Saratoga Crossings	Saratoga Crossings, Ltd.	Broward	Large	Family	128	\$ 2,561,000
2017-161C	2016-114	Miami-Dade Geo	Verbena	Verbana, LLC	Miami-Dade	Large	Family	110	\$ 2,300,000
2017-162C	2016-114	Miami-Dade Geo	Northside Transit Village IV	Northside Property IV, Ltd.	Miami-Dade	Large	Elderly	120	\$ 2,561,000
2017-179C	2016-116	Preservation	Jacksonville Townhouse Apartments	SP Jax Apartments LLC	Duval	Large	Elderly	250	\$ 1,660,000
2017-180C	2016-116	Preservation	Marian Towers	Marian Towers, Ltd.	Miami-Dade	Large	Elderly	220	\$ 1,660,000
2017-181C	2016-116	Preservation	St. Elizabeth Gardens	St. Elizabeth Gardens Apartments, Ltd.	Broward	Large	Elderly	153	\$ 1,124,111
2017-182C	2016-116	Preservation	Lake Point Plaza Apartments	W 76 Street LLC	Miami-Dade	Large	Elderly	76	\$ 731,735
2017-190C	2016-116	Preservation	Chipola Apartments	SP CA Apartments LLC	Jackson	Small	Elderly	48	\$ 476,000
2017-191C	2016-116	Preservation	Osprey Pointe f/k/a Shull Manor Apartments	Shull Manor REH, LTD.	Brevard	Medium	Family	65	\$ 645,000
2017-194C	2016-116	Preservation	Woodcliff Apartments	WCAR LTD	Lake	Medium	Elderly	34	\$ 296,071
2017-243C	2017-102	Local Revitalization	Saratoga Crossings II	Saratoga Crossings II, Ltd.	Broward	Large	Elderly	44	\$ 935,000
2017-251CS	2017-102	Local Revitalization	Addison, The	HTG Addison, LLC	Manatee	Medium	Family	90	\$ 1,510,000
2017-255CSN	2017-103	Homeless & Disabling Condition	Arbor Village	Blue CASL, LLC	Sarasota	Medium	Homeless	80	\$ 1,510,000

2017-256CSN	2017-103	Homeless & Disabling Condition	Village at Hyde Park f/k/a/ Londontowne Lane Project	Ability Londontowne, LLC	Duval	Large	Homeless	80	\$	1,780,000
2017-258CSN	2017-103	Homeless & Disabling Condition	Warley Park	Warley Park, Ltd.	Seminole	Medium	Homeless	80	\$	1,510,000
2018-065CS	2017-107	SAIL Workforce	Quarry II, The	Quarry Big Coppitt II, Ltd.	Monroe	Small	Workforce	112	\$	1,000,000

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