

From: Rafe Rabalais [mailto:rabalais@gchp.net]
Sent: Tuesday, November 18, 2014 12:24 PM
To: Ken Reecy; Steve Auger; Gayle White; Nancy Muller
Subject: comment regarding draft RFA 2014-114
Importance: High

Dear Mr. Reecy:

I am writing to comment on the most recent draft of RFA 2014-114 – Housing Credit Financing for Medium and Small Counties. Specifically, I am commenting on the new Ability to Proceed section that had not appeared in prior drafts of this RFA, nor in previous years' iterations of the RFA. Given the guidance on zoning matters that had been in previous RFA's, this constitutes a significant change in the eligibility guidelines at a very, very late stage in the application process. Instead of having approximately four to five months to pursue and secure zoning and site plan approval, we now have half that timetable because of the new Ability to Proceed requirements.

We are diligently working with a local government partner on a property that is ideally situated for a quality affordable housing development. The county is in full support of this project and will be providing substantial financial assistance to the development. However, because of inconsistencies between the county's zoning map and their land use plan, we will have to secure a formal zoning change. We have already worked with the county to obtain the right to an expedited re-zoning; but again, we had thought that the timetable to secure this approval would be within 21 days of the credit underwriting invitation, as had been the case in previous RFA's and drafts of this RFA (including the draft from one month ago).

Conceptually, we have no problem with this being the requirement in future years; but at this stage of the process, this constitutes a major change in the submission requirements, especially given the pace of local government approvals—even when the local government in question is a supportive partner.

Therefore, I respectfully request that you strike the Ability to Proceed requirements from the RFA and revert back to the requirements and timetable outlined in the October 17th draft of the RFA. I also apologize for the delay in submitting this comment, as I was out of the office for much of last week.

Yours truly,

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