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Sent: Thursday, February 22, 2018 10:57 PM

To: Marisa Button <Marisa.Button@floridahousing.org>

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Subject: Comment on RFA 2018-103 Homeless Housing

Dear Ms. Button -

After participating in the February 14th Workshop, we have the following comments:

We applaud the effort by FHFC to favor nonprofit developers over for-profit developers for special needs housing applications. Giving nonprofit developers a more equitable opportunity to access low-income housing tax credits is significant and you should resist efforts by for-profit developers to reverse this policy. For too long FHFC's rules have allowed for-profit developers to take advantage of what are supposed to be set-asides for nonprofits. The very idea that all you must do is give the nonprofit partner 25% of the developer fee and 51% of the general partnership to qualify the project as a nonprofit deal is woefully inadequate.

To qualify as a nonprofit deal in all FHFC RFA's we ask you to consider adopting these changes to your policy:

- 1) The first tiebreaker should be as follows: Deals where the project is owned 100% the by a nonprofit entity will be funded before any for-profit/nonprofit joint venture deals.
- 2) Require joint venture deals between nonprofits and for-profits to at minimum have 51% of the general partnership under the nonprofit entity, **and** 51% of the developer fee must go to the nonprofit entity.
- 3) Require that the Managing General Partner for all nonprofit deals must be the nonprofit entity.

Recommendation for Homeless Deals: We urge you to maintain the rule that has been in place for many years and which is working well - mainly that 50% of the units must serve the homeless - please do not increase the required homeless commitment to 70%. The economics of homeless deals are tough enough with the 50/50 split. Also, deals that have an overwhelming percentage of the units serving special needs populations tend to be much more likely to look and feel like institutional settings, which is to the detriment of the tenants.

Thank you for the opportunity to make these comments and suggestions.

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