



RHED

Rural Delivery

New York State Rural Housing Coalition, Inc.

June, 2005

RHED Application Deadline Extended

The US Department of Housing and Urban Development issued a Federal Register notice on May 25th re-opening the competition for the Rural Housing and Economic Development program, and extending the application deadline to July 11th. RHED had one of the first deadlines in this year's HUD SuperNOFA competition, and therefore was one of the first programs to test the new *Grants.gov* electronic application submission process. On the original application deadline date for RHED, May 17th, many applicants were unable to submit their proposals electronically due to problems at *Grants.gov*.

The May 25th Federal Register states "HUD understands that many eligible applicants may have had difficulty submitting their applications or had not completed their *Grants.gov* registration. Therefore, in order to give all NOFA applicants sufficient time to submit completed electronic applications and complete the registration process for *Grants.gov* electronic submission, this notice published in today's [May 25th] **Federal Register** reopens the Rural Housing and Economic Development Program competition. The new application submission date for the Rural Housing and Economic Development Program NOFA competition is July 11, 2005."

All other information related to the RHED NOFA, as originally published

in the Federal Register on March 21st still apply to the re-opened competition, including all requirements listed in the General Section as well as the RHED NOFA. If you have already submitted an application, you do not need to re-submit another application. HUD will rate and rank the most recently received application from each applicant and disregard any earlier submissions.

If you submitted a paper application without first obtaining a waiver from the electronic submission requirement, you will need to resubmit your application electronically, unless you obtain a waiver. All waiver requests must be received by June 9th. Waiver requests will be granted if the applicant does not have internet access in the community, or a physical disability prevents the applicant from responding to the NOFA electronically.

In working through a NOFA submission, staff of the Rural Housing Coalition have noticed that some of the SuperNOFA electronic application forms do not calculate sums properly. In addition, your computer may react with the PureEdge software that must be downloaded from the *Grants.gov* site in order to utilize the system. Common complaints that we have heard include PC's that lock up frequently. If you find that you are having PC problems or other difficulties with the *Grants.gov* system, please notify the Coalition at rhc@ruralhousing.org, so we can re-

port the problems to HUD at the conclusion of the NOFA cycle.

Some Suggestions: Based on our experiences here at the Coalition with the 2005 SuperNOFA and *Grants.gov*, we would like to offer the following suggestions to RHED and other SuperNOFA applicants:

1) **Submit early:** Make every effort to finish your proposal in advance of the deadline date to hopefully avoid the last-minute rush of applicants that might flood the *Grants.gov* system. This will also allow you some grace time to retry your submission if you run into problems.

2) **Read the instructions:** Be sure to read, understand and follow all the instructions for submission found in the NOFA materials.

3) **Stay calm:** If you run into problems, send an email to HUD and *Grants.gov* before the deadline runs out. This may preserve your rights to submit when the traffic jams on the electronic superhighway are cleared up.

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Rural Delivery

Rural Delivery is published by the New York State Rural Housing Coalition, Inc. a nonprofit membership organization. The Coalition is a statewide membership organization dedicated to strengthening and revitalizing rural New York by assisting housing and community development providers.

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Bits and Pieces...

Free Online Filing For IRS Form 990

The National Center for Charitable Statistics (NCCS) is offering non-profits free online filing of IRS Form 990. NCCS' process makes filling out the form easier and helps make it more accurate. For more information, visit www.ombwatch.org/article/articleview/2795/1/337. The 990 filing website is found at <http://efile.form990.org/>.

Grant Workshop Offered

The Rockland CARES Departments and Rockland Community College are sponsoring a workshop, Grant Seeking on the Internet, on June 22nd. For information on registration contact: Linda McMullan, Rockland CARES, Integrated County Planning Project, Robert L Yeager Health Center, Building L Sanatorium Road, Pomona, New York 10970, Phone (845) 364-3220, Fax (845) 364-3109.

Nehemiah Community Foundation

Nehemiah Corporation of America is a nonprofit community development corporation specializing in homeownership, affordable housing, and community development. The mission of the Nehemiah Community Foundation is to support faith-based and community-based organizations and to encourage individual achievement and self-sufficiency. The Foundation focuses support on nonprofit organizations working in the headquarters city of Sacramento, CA and in a number of selected cities; however, requests are accepted from throughout the U.S. Grants are made to projects that address the following program areas: affordable housing and neighborhood revitalization; job training and placement for low and moderate-income individuals; and education. Applications are accepted throughout the year. For more information visit www.nehemiahcorp.org/info_ncf.html.

Federal and U.S. military employees can support the Rural Housing Coalition through the annual Combined Federal Campaign (CFC). If you are a federal government or military employee and would like to donate through the CFC, please enter CFC code #9614 on your pledge card during the next fund drive.

House Committee Approves New Housing Fund

On May 25 the House Financial Services Committee, by a vote of 65-5, approved legislation to create a new regulator for the GSEs - Fannie Mae, Freddie Mac and the Federal Home Loan Banks. In a victory for affordable housing, the bill proposes establishing new affordable housing funds at Fannie Mae and Freddie Mac.

The bill would require Fannie Mae and Freddie Mac to set aside 5% of their after-tax profits to be used to benefit extremely low income and very low families through the funds. During discussions during the markup of H.R. 1461, it was estimated that the dollar amount for these two funds would be \$400-600 million in the first few years and could reach \$1 billion in five to six years.

The funds would be used for capital grants for the production, preservation and rehabilitation of rental housing as well as for assistance for first time homebuyers. One-eighth of the funds would be set aside for a leverage fund to support housing and economic development. At least 10% of the funds would be for homeownership. None of the funds could be used for administrative or other costs that do not directly create housing. Included in the specific selection criteria for applicants to the funds would be a preference for projects that benefit extremely low income families.

During consideration of the legislation, Representative Ed Royce (R-CA) offered an amendment to strike the affordable housing proposal from the bill. He argued that this legislation should be focused on safety and soundness and the housing proposal takes this legislation into "an experiment in socialism." Republicans and Democrats alike forcefully defended the proposal against

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Next FHLB Deadline October 3rd

In 2005, the Federal Home Loan Bank of NY will conduct two AHP competitive rounds. Applications will be due to the Bank at 5:00 PM on October 3, 2005 for the second round.

The Affordable Housing Program (AHP) provides subsidies to assist financial institutions in supporting the creation and preservation of housing for lower income families and individuals. The Home Loan Bank of New York funds its AHP with ten percent of its annual profits and manages the program within regulatory requirements established by the Federal Housing Finance Board. Subsidies are awarded to qualified projects submitted by members and selected through funding competitions held by the Home Loan Bank of New York. For further assistance please contact the Federal Home Loan Bank of NY at 212-681-6000 or the AHP department at 212-441-6850. You may also e-mail the AHP department at ahp@fhlny.com. Application materials for this funding opportunity can be found at www.fhlny.com.

The Challenge of Multi-Sites For Non-Profits

A recent article by two Harvard Business School professors explores the differing dynamics of not-for-profit cultures and how those differences impact multiple site operations. The study focuses on national non-profits with local operating sites. The conclusions appear to be relevant to smaller non-profits with multiple operating facilities.

Whether your sites are blocks away or states away, this HBS Working Knowledge article (by two business school professors) says multi-site nonprofits shouldn't use for-profit corporate management models and cen-

Lead Based Paint Training: One-Day Lead-Safe Work Practices

Sponsored by: NYS Division of Housing and Community Renewal, Western Catskills Community Revitalization Council and Schoharie County Rural Preservation Company

This course will cover how to identify the existence of lead-based paint; how lead based paint affects the body; the dangers it presents to people, especially children and pregnant women; where lead-based paint is most often located and how to use safe work practices to handle lead-based paint hazards.

This course is designed for contractors, persons working with families living in homes built prior to 1978, family members living in homes built prior to 1978 and persons doing renovations or remodeling their homes.

Note: Completion of this course will be a minimum requirement for all contractors working on projects/programs funded by the HOME Program.

The training will be held on Thursday - June 02, 2005 from 8:00am - 2:30pm at the Cyr Center, 159 W. Main St., Stamford, NY. Contact: Don Clarke, Coordinator, Western Catskills Community Revitalization Council, Phone: (607) 652-2823, Email: info@westerncatskills.org. The instructor will be Environmental Education Associates Inc. Pre-registration is required. There is no charge for this training. Sign-in begins at 7:30 AM. The presentation starts at 8:00 AM and ends by 2:30 PM. Refreshments will be provided. Lunch is on your own.

tralization isn't always best. For more information, visit <http://hbswk.hbs.edu/item.jhtml?id=3515&t=nonprofit&noseek=one>.

HUD Offers Homeownership Training

The Buffalo HUD office will sponsor a free one-day training session on **Making Home a Choice-** HOME, ADDI, and Section 8 Homeownership Voucher on June 14th, 15th, and 16th. The training is designed for staff of Participating Jurisdictions, Public Housing Authorities, Section 8 Administrators, HOME Subrecipients, CHDOs, State and local housing finance agencies, and housing counseling agencies in upstate New York.

The training will be led by Dennison Associates at the following locations:
June 14th: Albany Marriott Hotel, 189 Wolf Road, Albany.
June 15th: Radisson Marx Hotel, 701 E. Genesee Street, Syracuse.
June 17th: Doubletree Club Hotel, 125 High Street, Buffalo.

Each day's training begins promptly at 9:00 AM. Registration will begin at 8:30 AM. To register for this training, email Keisha Brown at kbrown@dennisonassociates.com. The deadline for registration is June 8th.

NAEH Conference In DC July 11th

Homeless advocates will meet in Washington, DC from July 11th-13th to take part in the annual conference of the National Alliance to End Homelessness. The program will affirm the progress made, share proven techniques and new ideas on how to build on success, and energize each other to face the challenges ahead. The conference will be held at the Hyatt Regency on Capitol Hill. Room rates start at \$130 per night. For hotel reservations, call the hotel directly at (202) 737-1234.

For more information, visit www.naeh.org/conf2005/index.html.

Tax Credit Training Offered In NYC And Syracuse

Nationally known author on the Low Income Tax Credit program, Joe Guggenheim, will be the trainer at two series of seminars in late June. The trainings are sponsored by the Supportive Housing Network of New York, Key Bank, the NYS Rural Housing Coalition, and Simon Publications.

Attendees at these trainings have the option of taking a one, two, or three day course of study. Day one is The Basic Course- Tax Credit Fundamentals. Day two is a followup course: Conventional Housing With Tax Credits. Day three is a followup course: Supportive Housing With Tax Credits.

The seminar series will be offered in New York City on June 22nd, 23rd, and 24th at the Top of the Times at Times Square, 255 W. 43rd Street.

The seminar series will be offered in Syracuse on June 27th, 28th, and 29th at Financial Plaza, 221 S. Warren Street, 2nd Floor, downtown Syracuse.

Class size is limited, and early registration is encouraged to assure seating availability. Fees for the courses vary, depending on the number of days, and the type of organization represented. The one day workshop price begins at \$295, the two day price begins at \$515, and the three day workshop price begins at \$715. Onsite registration with no prior notice costs \$35 extra, if space is available.

All trainings begin at 9:00 AM and run through 4:30 PM each day. Register in care of Simon Publications, (301)320-5771, or email info@housingtaxcredits.net.

DHCR Seminar Series Continues

Seminar #3: An Overview of Housing Quality Standards and Lead Based Paint Regulations.

DHCR is pleased to announce the third in a series of seminars. This seminar will provide an overview of housing quality standards (HQS) and lead based paint (LBP) regulations. The goal of the seminar is to enable you to assess your procedures and determine if your records can stand up to monitoring. Monte Franke has worked around the country helping administrators implement the LBP rule. Kathleen Dorgan is a distinguished architect and recipient of Harvard's Loeb Fellowship. The training will be a day of re-

view and discussion on what is effective in managing housing rehab programs. The trainings will be held on: June 01, 2005, Empire State Plaza Convention Center, Meeting Room #1, Albany

June 22, 2005, Holiday Inn, 601 Dingsen Street, (*Enter at Max's Restaurant*), Buffalo

June 23, 2005, HUD Storefront, 128 E. Jefferson St., Syracuse

All trainings run from 9:00AM - 4:00PM. Sign-in begins at: 8:30AM. To register, visit the DHCR website at www.dhcr.state.ny.us/ocd/apps/seminar/seminar_intro.asp#s3.

202 Application Deadline Extended

HUD has extended the application deadline for Section 202 projects until July 1st. The deadline extension was issued along with technical corrections to the Assisted Living Conversion program application, and the Section 811

Housing For The Disabled program application.

For more information on the NOFA amendment for 202 programs, visit www.hud.gov/offices/adm/grants/nofa05/sec202shep.pdf.

The New York State Rural Housing Coalition is happy to be able to provide help wanted advertising opportunities for our members and non-profit community development agencies. Ad copy must be provided in Microsoft Word format, and may be transmitted by email to rhc@ruralhousing.org. Ad copy must comply with federal and state equal opportunity requirements to be published, and must be received by the 25th of the month to ensure placement in the succeeding issue of *Rural Delivery*. Ads provided in this fashion will also be posted in the Career Opportunities page of the Coalition's website, unless a request is specifically made not to place the advertisement on-line.

Consultants Wanted

The Rural Housing Coalition is soliciting proposals from qualified community development consultants that are interested in joining our team. The Coalition seeks consultants with expertise as technical assistance providers and trainers on a variety of community development and housing topics, including but not limited to: non-profit management; board development; legal services; construction management and design services; development finance; environmental hazard mitigation; real property management; accounting/bookkeeping and financial management; and grant writing and proposal packaging. Technical assistance and training providers selected for inclusion in the Rural Housing Coalition's team of subcontractors will enter into a master contract with the Coalition, with individual work assignments issued on a task order basis.

To obtain a copy of our Request for Qualifications, visit www.ruralhousing.org/career.html.

Career Opportunities

Homeownership Educator/ Housing Counselor

The Albany County Rural Housing Alliance, Inc., a not-for-profit Rural Preservation Company, is seeking an individual to provide education, counseling and program administration to our client base. Qualifications: BS or relative experience. Strong interpersonal and public speaking skills are necessary. Ability to conduct classroom-style seminars. Knowledge of low-income housing issues and public funding sources a plus. Reliable transportation is required. 35 hour work week. Health and time benefits. Starting salary: high-20s. Send resume and cover letter by June 10, 2005 to Albany County Rural Housing Alliance, Inc., PO Box 407, Voorheesville, New York 12186 Attention: Judith Eisgruber or by E-mail to jeisgruber@acrha.org. EOE

Director of Finance & Asset Management

SCAP Inc., a respected regional provider of affordable, special needs housing and support services serving Steuben, Livingston, and Allegany Counties seeks financial leadership and real estate expertise to manage corporate assets, analyze proposed real estate investments, manage projects and build financial sustainability. Leadership, analysis, forecasting, problem-solving, coaching, project management, an opportunity to serve with acknowledgement and make a real difference. Exposure to public funding/regs and LIHTC strongly preferred. E-mail resume and salary requirements to susanm@nonprofitjobs.org Visit www.nonprofitjobs.org and www.scapinc.org for information. EOE

Director of Operations

The Director of Operations oversees all aspects of the Supportive Housing Network of New York's day-to-day operations, including implementation of major programs, financial management, contract and grant management, administration, human resources and technology, manage as many as seven staff at varying levels including recruitment, hiring, orientation, training, performance review, career development and role growth.

Qualifications -

College degree; advanced degree highly desirable. Five to seven years management and staff supervision experience, preferably in membership organization or trade association.

Related Skills-

Superb communication and interpersonal skills. Ability to organize, manage and motivate effective work teams. Ability to support staff in organizing and prioritizing the work effort. Strong sense of ownership of organization performance. To apply for the position, please send cover letter and resume to: Amy Glover, Executive Assistant, Supportive Housing Network of New York, 475 Riverside Drive, Suite 250, New York, NY 10115, Fax: 212-870-3334. Email: aglover@shnny.org, www.shnny.org. EOE

Real Estate Development Manager

Nonprofit housing developer in Bath, NY seeks 5 years hands-on project management experience to identify, evaluate, structure projects blending public \$/ Low Income Housing Tax Credit. Savvy with spreadsheets, critical path, funding regs, project budgeting, project oversight. E-mail resume and salary requirements to susanm@nonprofitjobs.org. EOE

LISC Online Forum Explores Section 202 Refinance

Since its inception in 1959, the Section 202 Program has been the principal funding source for the creation of over 207,000 affordable apartment units for seniors. Many of these properties have high interest rates on existing mortgages and are in need of recapitalization. To support repairs and upgrades, refinance, and provide social services to residents, new opportunities prompted by recent Congressional action, including Low Income Housing Tax Credits (LIHTC), are available. An Experts Online session on June 15th from 2:00-3:30 PM will highlight the importance of affordable housing preservation and feature effective strategies of revitalizing Section 202 properties, based on the experience of LISC's Housing Preservation Program. Panelists will discuss the new refinancing options and help you sort through competing and confusing strategies to revitalize these properties for current and future residents in your community.

For more information, visit www.lisc.org/resources/2005/06/refinancing_8069output.asp.shtml.

Supersize My House

The March/April issue of Mother Jones lists some interesting trends in American homes. Is it advancement or just excessive? For instance, 1 in 5 new homes is larger than 3000 sq ft. In 1950, 1 in 100 homes had 2.5 baths, today 1 in 2 do. A typical luxury kitchen remodel costs \$57,000, (\$10,000 more than it costs to build a Habitat for Humanity home). Read more at www.motherjones.com/news/exhibit/2005/03/exhibit.html.

Program Offers Operating/Capacity Building Support

The Bank of America *Neighborhood Builders* program is designed to strengthen the capacity and infrastructure of select nonprofit groups and to promote the professional development of their leaders. Applications for this program are due June 30th.

In addition to \$200,000 in grant funding for operational support—\$100,000 annually over two years—each selected organization will be invited to send its senior executive and one of its emerging leaders to participate in a specially designed leadership development program. Senior executives will gather for three 3-day workshops focusing on topics such as strategic thinking and business planning, leadership development and succession planning, leading high performing organizations and building a diverse funding base. Emerging leaders will gather for two 3-day workshops focusing on topics such as developing organizational management skills, managing strategic opportunities, forging alliances and building communities.

This program is available in select Bank of America markets nationally, including New York City and Long Island. For more information, visit www.bankofamerica.com/foundation/index.cfm?template=fd_neighborexcell.

Legal Service Aids Lower Income Homebuyers

An innovative program of the Capital District Women's Bar Association offers low or no cost legal representation to lower income homebuyers through the Affordable Housing Attorney Assistance program (AHAA). The service is available in the counties surrounding Albany.

Founded in 1995, The Legal Project provides non-criminal legal assistance with a special commitment to women and others who may have difficulty in obtaining legal services. The Legal Project is unique in that it addresses the civil legal needs of the working poor—those who 'on paper' make too much money to qualify for programs for the indigent, but who do not make enough to pay the fees of private attorneys. AHAA assists homebuyers who are unable to afford the fees of an attorney. Over 200 attorneys provide pro-bono representation through The Legal Project. For more information, call (518) 435-1770.

Save The Date!

2005 Annual Affordable Housing and
Community Development Conference
Syracuse University Sheraton Hotel

October 18th and 19th
(800)395-2105 for reservations.

ConPlan Comments Cont'

Continued from P.8

The nonprofit developers fee allowable in a HOME or HTF development was frequently substantially less than that allowed to for-profit developers. We believe that this situation is harmful to the financial well-being of the non-profit housing industry. We understand that some progress has been made to increase nonprofit developers fees in

some DHCR-administered programs. We encourage continued progress on this issue in the hopes that all DHCR housing programs will offer the non-profit sector full parity with the for-profit sector in qualifying for developers fees on new rental project development activities."

SONYMA And Federal Recapture Tax

SONYMA data suggests that most SONYMA mortgage applicants will not have to pay a federal recapture tax. Borrowers will not have to pay a recapture tax if any of the following events occur:

- The borrower owns the home for more than 9 years.
- The borrower sells or otherwise disposes of the home within 9 years of acquiring it, but does not make a profit on such sale or disposition.
- The borrower sells or otherwise disposes of the home within 9 years of acquiring it, but the household income at the time of such sale or disposition does not exceed a certain pre-established amount.

In most cases, in order for a recapture tax to be applicable, the typical SONYMA borrower's household income would have to increase substantially between the time the home was purchased and the time it is sold or otherwise disposed.

For example, in 2004, the average SONYMA borrower's household earned \$43,925 annually and had a household size of 2 persons. If this average SONYMA borrower sold or

otherwise disposed of the home within the first year of purchasing the SONYMA financed property, his or her household income would have to increase over \$20,300 (or 46%) in just one year for a recapture tax to be due. If this borrower sold or otherwise disposed of the home four years after purchasing it, the increase would have to be \$30,800 (or 69%). In the seventh year, the typical SONYMA borrower's household income would have to increase by \$43,000 (or 96%) to require payment of a recapture tax. Furthermore, if this SONYMA borrower's household size increases to three or more persons by the year in which the property is sold or otherwise disposed, the household's income would have to increase to over \$30,400 (or 68%), \$42,600 (or 95%), and \$56,600 (or 125%) in the first, fourth, and seventh years, respectively.

These statistics plus the fact that the disposition of the property must occur within 9 years and be at a profit indicates that the majority of SONYMA borrowers may not have to pay a recapture tax. For more information on this issue, visit www.nyhomes.org/sony/faqsony.html#Recapture%20Tax.

Trainings From Your Coalition

The Rural Housing Coalition is still accepting registrations for training programs in June to assist housing and community development agencies to more effectively meet the challenges of the day:

Fundraising - Choosing the Best Strategies For Your Organization will be held at the Ramada Inn in Geneva on June 20th and again at the Riversedge Resort in Alexandria Bay June 21st. This training will be lead by Linda London, who teaches fundraising, grant writing, and marketing at the College of St. Rose in Albany.

Outcome Thinking will be held at the Gideon Putnam Hotel in Saratoga Springs on June 15th. The session will be repeated at the Steamboat Landing Conference Center in Canandaigua on June 22nd. This training will be lead by Bill Phillips, of the Rensselaerville Institute. The Rensselaerville Institute has been a leader in the development of outcome models of nonprofit management and foundation funding.

All training sessions will be free to attend. If you wish to register for one of the sessions, call David Rustin at (518) 458-8696, ext 10.

Housing Fund *Cont. from P. 3*

Royce's measure. Ranking Member Barney Frank (D-MA), who crafted the proposal with Committee Chair Mike Oxley (R-OH) and Housing and Community Opportunity Subcommittee Chair Bob Ney (R-OH), said the fund would be similar to the program the Federal Home Loan Banks now have and would make a contribution to housing that the GSEs' current housing goals do not meet. He also said he plans to work to deepen the income targeting in the legislation as the bill works its way through the legislative process.

Chair Ney said that the proposal sets up a good fund for a good purpose. Ranking Member of the Housing and Community Opportunity Subcommittee Maxine Waters (D-CA), said that there is a housing crisis in America and this proposal is a "magnificent opportunity to get Americans in decent housing." After a lengthy debate, the Royce amendment was defeated by a vote of 53 to 17.

The Committee rebuffed attempts by the Administration to include language that would strictly limit the types of assets Fannie and Freddie could hold in their portfolio. The legislation would give the new regulator discretion to restrict the portfolio only for safety and soundness reasons.

The bill also strengthens the current housing goals for Fannie Mae and Freddie Mac. During the markup, an amendment by Representative Luis Guterierrez (D-IL) was passed that would restore affordable housing goals' targeting in minority census tracks.

The next step for the legislation is action by the full House, which could come as early as mid-June. A similar measure is expected to be under consideration in the Senate Banking, Housing and Urban Affairs Committee shortly, with Chair Richard Shelby (R-AL) expected to include an affordable housing fund proposal in his bill.

Coalition Submits ConPlan Comments

The Rural Housing Coalition recently submitted the following comments related to the State's Consolidated Plan update:

“1) The Consolidated Plan has historically identified the Rural and Neighborhood Preservation programs as a primary delivery mechanism for the provision of housing services to those in need in New York State. The funding crisis resulting from the State budget of FY 2004-05 has severely damaged the network of Preservation Companies in the State. The Rural Housing Coalition requests that the Con Plan identify the need for supporting the rebuilding of this vital network, including rebuilding the capacity of local agencies that have been damaged by the funding cutback, as well as replacement of those agencies that were not able to survive the loss of critical state financing support this past year.

2) There is a functional conflict between DHCR's Design Manual standards and those of a critically important federal housing program that makes it impossible to utilize the programs together. We believe this situation is to the detriment of efforts to provide affordable housing options in rural communities. The maximum square footage that can be built for a one bedroom apartment under HUD's Section 202 program is 540 square feet. This is less than the minimum square footage allowable for a one bedroom apartment in DHCR's design manual. The practical result is that HOME or Housing Trust Fund dollars can not be used to fill any financing gaps that may occur in the development of a 202 project. We know of two rural projects that are in jeopardy at this time because of this issue. We are requesting that DHCR seriously consider reducing the minimum square footage al-

lowable in the Design Manual to match the 202 program's maximum allowable square footage.

3) Development of new affordable rental housing in rural communities is complicated by matters of scale. Large rental projects can easily overwhelm a small real estate market. The Small Project Setaside Initiative was applauded by the Rural Housing Coalition at its inception, and we still believe it is an excellent concept. We hope that DHCR will invest more effort in promoting this concept to the rural communities of New York to create rental housing options that are contextually appropriate for small communities.

4) The non-profit real estate development community has historically been at a financial disadvantage when compared to private, for profit developers, in terms of accessing Developers Fees.

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Visit our website at www.ruralhousing.org
