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To: Ken Reecy <Ken.Reecy@floridahousing.org>
Subject: Public Comment

HTG supports the removal of the Local Government Area of Opportunity Funding Preference. While we were successful in obtaining this funding preference in 2016 for Heron Estates Senior in Palm Beach County, we believe this funding preference offers an unfair advantage to certain applicants and a corresponding disadvantage to certain smaller municipalities.

As another applicant has correctly stated, joint ventures with Housing Authorities and Community Redevelopment Agencies are unfairly advantaged over applicants which are not part of a joint venture. Further, there are many smaller municipalities in the six large counties that simply do not have the resources available to provide the funds necessary for the funding preference and continuing the use of this funding preference will unfairly preclude those smaller municipalities with less resources from seeing new affordable housing.

Florida Housing should not provide an unfair advantage to those better capitalized municipalities, as their ability to provide the funds for a local government funding preference should tell the Corporation that those better capitalized municipalities also have the gap funds necessary to build more affordable housing through means outside of the valuable and oversubscribed 9% Housing Credit RFAs.

Thank you for your consideration.

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