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**Sent:** Thursday, July 13, 2017 10:34 PM  
**To:** Ken Reecy <[Ken.Reecy@floridahousing.org](mailto:Ken.Reecy@floridahousing.org)>  
**Subject:** Public Comment

Mr. Reecy:

I would like to make an additional comment on the future allocation for Housing Credits concerning the way the FHFC has decided to ignore all of the well established criteria for allocating Housing Credits plus their associated bonuses. That previous criteria had been arrived at through study, public comment and actual analysis. Without any of the aforementioned, the FHFC deciding on its own that a different set of criteria were more appropriate. It appears that the FHFC was motivated solely out of fear of litigation when no such threat actually exists.

The Federal Government from where House Credits and other funds utilized by the FHFC come, had previously determined that its own funds should be targeted where that funding is most needed which is in the following areas:

- Qualified Census Tracts (without any qualification of the absence of need because a majority of the residents are of a certain ethnic group. It could also be argued that excluding areas of heavy concentrations of certain ethnic and racial groups could be considered to be discriminatory)
- Enterprize zones (these are specified as target areas for Federal funding)
- CDBG target areas (even if the program goes away the need for affordable housing in those areas will still be there)
- Rural Areas of Critical Economic Concern (this is a new and up to date criteria which has not yet been used to target Federal funding so it should represent an area of very great need which should be prioritized)

Additionally, there are the State funding target areas that should also be respected since the FHFC is a sister agency:

- Entitlement zone (these are specified as target areas for State funding)
- Front Porch (this was passed by the legislature and approved by the governor several years back and then ignored so there is most likely a substantial unmet need in those areas)

In addition there are local criteria where the various City & County governments want to see new affordable housing. Why shouldn't those elected officials be listened to by the FHFC board who are after all appointed?

As I understand it the entire system of targeting where affordable housing funding was invested for years had been upended because the US Supreme Court ruled in a Fair Housing case that the lower court should be able to determine if allocating funding to build new affordable housing in areas of heavy ethnic concentration was discriminatory in nature. Guess what? The lower court decided it was NOT!!! So why is the FHFC acting as if the decision went the other way and somebody may sue them? Makes no sense to me. Bottom line please go back to the way things used to be which nobody complained about.

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