

From: Sam Johnston <Sam@ArbourValley.com>

Sent: Friday, April 26, 2019 5:23 PM

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

Subject: 2019/2020 RFA General Process - Small and Medium County 9% Housing Credit RFA Local Government Area of Opportunity

Dear Ms. Button:

We support FHFC's thinking that eligible Local Government Area of Opportunity applicants be selected from New Jurisdictions. This provision ensures a fair allocation of housing credits across "unfunded" jurisdictions and avoids disproportionate funds flowing into any one community. That being said, there is a loophole where prior-funded jurisdictions could be awarded credits in two consecutive years. For example, in the RFA 2018-110 round, if an applicant, qualifying with Local Government Area of Opportunity funding, applied as a non-profit or targeted ASL (both of which were selected before Local Government Area of Opportunity awardees), that jurisdiction could be considered a New Jurisdiction in the subsequent cycle. We would encourage you to close this loophole so that credits flow fairly across all jurisdictions.

Thank you for your consideration.

Best regards,

Sam Johnston

Principal

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