



November 19, 2013

Mr. Steve Auger
Executive Director, Florida Housing Finance Corporation
Tallahassee, FL 32301

Re: Comments on Proposed HOME RFA

Dear Mr. Auger:

I am writing as a project developer with experience in small counties and on behalf of several CHDO organizations that have previous experience and current interest in developing affordable rental units in small counties.

I am writing in response to the draft HOME RFA and make the following observations and requests.

Federal HOME dollars are allocated to Florida based on a population-driven formula. When a small community does not meet the minimum threshold level for funding, HOME funds are instead allocated to the state for non-participating jurisdictions. The state's current allocation is the higher of \$3 million or total funds that would have otherwise gone to non-participating jurisdictions.

The majority of HOME funds awarded to FHFC are those funds that would have otherwise gone to non-participating jurisdictions. Even if there is no legal requirement to give applications from those areas a priority, it would seem that fairness would guide the policy—so that the areas who do not directly receive their own HOME funds are served before areas that already receive HOME funds directly from the federal government.

FHFC policy over the years has recognized this funding need. In the past, absolute preferences and/or point preferences to address the needs of small counties and CHDOs have been used in almost all years of HOME funding cycles. In order to provide for needed HOME funds to small counties, non-participating jurisdictions, and CHDOs, we make the following requests:

- 1) Create a new first preference in 2014 for small counties. This would be consistent with previous HOME funding cycles and in particular consistent with the programs last offered in 2006. The first preference under the 2006 program was for small counties and it should be brought back for the 2014 program.
- 2) Create a new second preference for CHDOs in the 2014 program. Similarly, the second preference under the 2006 program was for 100% non-profit projects. By creating a new second preference for CHDOs in 2014, a similar intent to 2006 is made current.





Thank you for the opportunity to comment on these issues. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Judd K. Kroth". The signature is written in a cursive style with a large initial "J" and "K".

Judd Roth

