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January 13, 2022

Bill Aldinger
C/O Zach Summerlin
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301-1367

RE: HOME ARP

Dear Mr. Summerlin and Mr. Aldinger;

Please accept the following comments related to the Florida Housing Finance Corporation's plans for the HOME – American Rescue Plan Act.

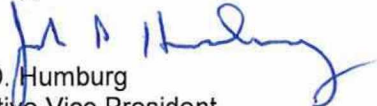
First, we recommend that majority of these funds be used for the **development of affordable rental housing** for individuals with special needs (as defined by the Florida Statutes). Further, it is our recommendation that FHFC prioritize projects that are "shovel ready" and do not need extended pre-development. These funds are designed to address the COVID-19 pandemic and therefore should be able to be used without extended planning and underwriting. While we recognize the need for non-profit capacity building, this crisis is not the time to devote these scarce funds to building capacity for an organization that is not prepared to immediately provide much needed affordable housing.

Secondly, it is rare that funds coming from federal sources, as administered by FHFC, can be used for "**support services**" as allowed under this act. We recommend that a portion of these funds be set aside and coupled with development funds to provide support services for the individuals with special needs as recommended above.

Finally, we recommend that projects be considered for funding from throughout the state. Those being considered for funding that are in entitlement jurisdictions should demonstrate a local commitment by having a local financial contribution. Further, we recommend that the use of a land trust, and corresponding 99-year lease, be considered a substantial local contribution for this program and others undertaken by FHFC.

Thank you for the opportunity to provide these comments to strengthen Florida's commitment to the American Rescue Plan.

Sincerely,


Jack D. Humburg
Executive Vice President
Housing, Development, and ADA Services



Boley Centers, Inc.
is accredited
by CARF.




Juvenile Welfare Board

 Pinellas
Community
Foundation

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 - . *Outpatient Counseling*
 - . *Permanent Housing Opportunities*
 - . *Psychiatric Treatment & Services*
 - . *Safe Havens for Veterans and Individuals who are Chronically Homeless*
 - . *Specialized Group Homes*
 - . *Supported Housing*
 - . *Tenant-Based Rental Vouchers*
 - . *Youth Employment Services*

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