

March 1, 2021

Christopher Allison  
NMTC Program Manager  
CDFI Fund, U.S. Department of the Treasury  
1500 Pennsylvania Avenue N.W.  
Washington, DC 20220

Dear Mr. Allison,

Florida Community Loan Fund (FCLF) is one of the State's oldest and largest community development financial institutions (CDFI), federally certified by the U.S. Department of Treasury. As a non-depository revolving loan fund, FCLF is also the first CDFI in Florida to become a member of the Federal Home Loan Bank of Atlanta. To date we have lent over \$470 Million in financing into projects valued at over \$1.21 Billion. As a result, FCLF financing has helped to produce 6,194 units of housing and 2.4 million sq. feet of community facility space, that touch the lives of an estimated 584,000 Florida residents per year.

FCLF has been engaged in the New Markets Tax Credit Program since 2004 and has closed 29 NMTC transactions representing total project costs of over \$624 million. In addition, FCLF's Chief Lending Officer is a member of the Board of the National New Markets Tax Credit Coalition.

In this letter, we would first like to endorse the recommendations provided by the National NMTC Coalition in its detailed Letter of Public Comment submitted on behalf of the industry in response to the changes proposed by the CDFI Fund for the NMTC Allocation Application, for fiscal years (FY) 2021-FY 2024 funding rounds.

In addition, we would like to emphasize our support specifically for comments regarding Questions:

- Question 18 with respect to "Due Diligence";
- Questions 24,34B and 40 which address transparency and in particular the disclosure of fees by all parties;
- Question 25A concerning the importance of flexible lease rates; and
- Question 26A with respect to the specific importance of multi-component projects and the reinstatement of the "Other" category.

Thank you for your consideration of these public comments and for your ongoing support of the NMTC industry and the community interests which it serves.

Sincerely,



Ignacio Esteban.  
CEO



Nelson W. Black, III  
Chief Lending Officer



Joy Beaton, Director of  
Government Relations

Attachments: FCLF Our Impact 2020 & Annual Report 2020