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May 1, 2009

Deputy Director of Policy and Programs
CDFI Fund
U.S. Department of the Treasury
601 13th Street, NW
Suite 200 South
Washington, DC 20005

Via Fax: 202.622.7754

RE: Request for Comment on Capital Magnet Fund Program

Dear Mr. Josephs,

On behalf of my organization, Ohio Capital Finance Corporation ("OCFC"), I appreciate the opportunity to comment on the CDFI Fund's Request for Comments published in the *Federal Register* on March 6, 2009 regarding the Capital Magnet Fund Program.

Since 2002, OCFC, a CDFI, has originated over \$31,000,000 in 137 loans, creating over 4,087 units and preserving over 3,175 affordable housing units in Ohio. 100% of these units are designed for and affordable to households with incomes below 60% of the area median, OCFC's target market. OCFC's financing catalyzed and leverage over \$500,000,000 in total project costs.

OCFC created and operates the Ohio Affordable Housing Loan Fund I, LLC (OAHLF) a \$17M revolving loan fund funded by 7 regional and national financial institutions. OAHLF makes predevelopment, acquisition and bridge loans available to developers of affordable housing in Ohio. In December 2007, OCFC received the Next Award for Finance from the Opportunity Finance Network. Additionally in February 2009, OCFC was named as an awardee of the MacArthur Foundation's *Window of Opportunity Program* which will provide a \$4M program related investment and \$1M grant to OCFC. It is our hope that this funding leveraged with our pending application to the CDFI Fund for FA and TA will create a new \$25M Preservation Loan Fund.

Your request for comments is quite extensive. Opportunity Finance Network (OFN) addressed all questions posed by the CDFI Fund regarding the Capital Magnet Fund Program and I encourage you to follow the guidance provided by OFN.

In general, I strongly urge the CDFI Fund to use definitions and criteria from existing programs and regulations, such as its own CDFI Program (financial assistance and technical assistance), when possible. Where no program, regulation, or statute is referenced, OFN's comments draw on the understanding of organizations like mine that have decades of experience providing services to low-income communities.

Page 2 of 2

OFN along with Members of Congress created the concept for this program based on the experience of the various subsidy programs at the U.S. Department of Housing and Urban Development (HUD) and the CDFI Program. Congress decided to house the Capital Magnet Fund Program at the CDFI Fund rather than HUD because of the CDFI Fund's approach to providing institutional-based rather than project-based funding. The core concept underlying the Capital Magnet Fund Program is to provide capital at the institutional level rather than directly into real estate projects. This successful approach allows federal grants to be deployed more effectively and flexibly to leverage private capital and to achieve larger-scale impact. I am confident that if OCFC was provided with a substantial grant \$50M+ from the Capital Magnet Fund, the funding would be leveraged time and time again to create and preserve additional affordable housing. This resource is drastically needed and would be much more powerful if operated by OCFC versus granted to individual projects.

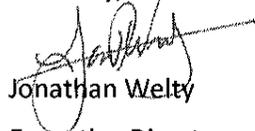
The Capital Magnet Fund Program is *not* a block grant or project-based program. The Capital Magnet Fund Program capitalizes on what CDFIs and nonprofit affordable housing developers do best, which is to leverage a small federal investment with other funding. This is essential to the success of the Capital Magnet Fund Program. Again, I stress that the concept for the Capital Magnet Fund Program was based on the CDFI Program and regulations should closely follow the guidance of this program whenever possible. The New Markets Tax Credit Program is *not* an appropriate model for the Capital Magnet Fund Program. I would also like to emphasize the following points that Opportunity Finance Network made in its comment letter:

- For the purpose of leverage and leverage reporting, non-Capital Magnet Fund financing sources should include both federal and non-federal sources of capital.
- Capital Magnet Fund grants should not be limited to areas of economic distress since the priorities of the program are extremely low-, very low-, and low-income *families*.

The Capital Magnet Fund Program, which provides enough flexible funding to support a wide variety of housing and community revitalization options and encourages significant leveraging of federal dollars, is likely to be one of the best tools available to help our lowest-income people and neighborhoods survive our current economic crisis. I encourage you to finalize regulations for this program as soon as possible.

Thank you for the opportunity to comment. Please do not hesitate to contact me at 614.224.8446 or jwelty@occh.org if you have questions or need additional clarification.

Sincerely,



Jonathan Welty

Executive Director