

Turnstone

DEVELOPMENT

August 5, 2013

Florida Housing Finance Corporation
Mr. Steve Auger, Executive Director
Via Email

Dear Mr. Auger:

We appreciate the opportunity to offer comment on the 7/23/13 draft Broward, Miami-Dade and Palm Beach Counties RFA.

We were dismayed to see such a basic change made by Florida Housing in mandating a Mandatory Distance Requirement for this RFA. Prior to this, in the May draft rules, all of Broward County was not subject to any requirements for separation from developments on the Proximity List because there are no LDAs in Broward County. Since there is a huge demand for additional affordable housing in Broward County (22,199 units per the 2013 Shimberg Center Rental Market Study), we would respectfully request that Florida Housing remove the Mandatory Distance Requirement for Broward County.

If this is not agreeable to Florida Housing, we respectfully request that the Mandatory Distance Requirement for Broward County be set at the same distances as Miami-Dade County. Specifically, on page 19 of the draft RFA, under subsection (ii), the distance for Miami-Dade County was switched from one mile to one-half mile, yet the distance was not changed for Broward County. This seems to be inconsistent with subsection (iii), where the distance is one-half mile for both counties. Further, in every other aspect, the RFA treats the two counties exactly the same, and both counties have been treated the same by FHFC for many years. That's because both counties have a massive need for more affordable housing.

Thank you for your consideration in this matter.

Sincerely,



Bill Schneider
Executive Director