



August 19, 2019

Mr. Trey Price and Ms. Marisa Button
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

Re: Automatic qualification of the Mandatory Distance Requirement ("MDR") for Affordable Housing Developments located in Miami-Dade

Dear Mr. Price and Ms. Button,

On August 13th, Florida Housing Finance Corporation (the "Corporation") issued revised drafts to the 9% Housing Credit Geographic RFAs which removed newly incorporated language regarding applications eligible for the automatic qualification for the mandatory distance requirement. Housing Trust Group ("HTG") is in support and requests that the Corporation allow Applicants to automatically qualify for the mandatory distance requirement if their proposed development is located entirely in a HUD-designated SADDA.

As the Corporation has made it a funding goal in the past to fund two- and three-factor family developments, and because of the scarcity of land in these two- and three-factor tracts, land suitably priced for tax credit development in two- and three-factor tracts are now either: 1) within mandatory distance requirements buffers for family developments, or 2) are located in areas that do not meet the proximity/services threshold. As such, allowing SADDAs to forego the mandatory distance requirement and proximity requirements would benefit the general population (families) in need of housing by opening up these zip codes that are still adjacent to two- and three-factor tracts, and in many ways, have the same prime location benefits of two- and three-factor tracts.

The difference between two- and three-factor tracts and SADDAs is that SADDAs often include some emerging neighborhoods (i.e. Allapattah, Overtown, Wynwood, Homestead, etc.), as opposed to neighborhoods that are just already too cost prohibitive. These emerging SADDA neighborhoods are also experiencing quickly rising land values, and therefore will inevitably become just as unaffordable as its two- and three-factor neighboring tracts. This phenomenon alone outlines why it is crucial to prioritize family development in these areas.

Due to the foregoing, HTG recommends and requests that the Corporation re-implement and maintain its original intent of allowing Applicants to automatically qualify for the mandatory distance requirement if their proposed development is located entirely in a HUD-designated SADDA. These are high-cost, emerging zip codes that will soon be too cost prohibitive for developing affordable housing. The more census tracts the Corporation can include which meet its funding goals, the more opportunity developers will have at developing affordable communities for the working general population that reside in these areas.

Respectfully submitted,

Housing Trust Group, LLC
a Florida limited liability company

By: 
Matthew Rieger, Manager