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**Sent:** Thursday, August 15, 2019 2:04 PM  
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**Cc:** Kenneth Naylor <[knaylor@apcommunities.com](mailto:knaylor@apcommunities.com)>; Carine Yhap <[cyhap@apmanagement.net](mailto:cyhap@apmanagement.net)>  
**Subject:** FW: Revised drafts of Housing Credit Geographic RFAs posted

Good afternoon Marisa,

On behalf of Atlantic Pacific Communities, thank you for your ongoing engagement with stakeholders throughout the RFA processes. We appreciate the opportunity to review the Corporation's methodology and dataset that informed the proposed change to the definition of Public Bus Stop from hourly stops during rush hours to 18 stops per day for Large Counties and 12 scheduled stops for Small and Medium Counties. Based upon our review of the Corporation's "Bus Stop Research" document, we are not supportive of the requirement that a Public Bus Stop in Large Counties have 18 scheduled stops.

While we're generally supportive of the Corporation's efforts to increase Proximity requirements and therefore future residents' access to transit and community services, we believe the Corporation should review the data on a county by county basis. At this stage it is too late in this RFA cycle to do this, and to propose a change that would have this significant of an impact. Further, when the Corporation intends to increase or clarify requirements, the data that informs these changes should be made widely available to the public, providing experts and stakeholders the opportunity to vet the sources and methodologies.

For example, we have a site located in an Area of Opportunity in Duval County, which are difficult to find, that does not meet this new requirement. We encourage the Corporation to delay implementation of this change until the next RFA cycle in order for stakeholders and Corporation staff to have sufficient time and opportunities to vet the sources and methodologies and instead leave the definition as it was and clarify the hourly requirement. For example, Public Bus Stop: *A fixed location at which passengers may access one or two routes of public transportation via buses. The Public Bus Stop must service at least one bus route with scheduled stops on each clock hour 7am to 9am (i.e. 7am to 8am and another one from 8am to 9a,) where the previous or next clock hour's claimed stop (i.e. 8am to 9am) shall run at a minimum of 20 minutes between each other or more, and a maximum of 80 minutes apart from each other, and also during the times of 4pm to 6pm, Monday through Friday, excluding holidays, on a year-round basis. Bus routes must be established or approved by a Local Government department that manages public transportation. Buses that travel between states will not be considered.*

Please feel free to contact us if you have any questions.

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