From: Carine Yhap <cyhap@apmanagement.net>
Sent: Friday, August 16, 2019 4:44 PM
To: Marisa Button <Marisa.Button@floridahousing.org>
Cc: Diana Fields <Diana.Fields@floridahousing.org>; Kenneth Naylor <knaylor@apcommunities.com>
Subject: RE: Housing Credit Geographic RFA Workshop information

Hi Marisa,

We appreciate the opportunity to review the Corporation's dataset and methodology 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 cursory review of the Corporation's "Bus Stop Research" document, we are not supportive of the requirement that Public Bus Stop have 18 scheduled stops for Large Counties. Moreover, we believe the Corporation should implement a policy that is informed by a county-by-county review of bus schedules.

While we are generally supportive of the Corporation's efforts to increase Proximity requirements for the benefit of our residents, it is late in this RFA cycle to propose a change that would have such a significant impact. 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 methodology and its likely effects in each County.

In the interim, we would recommend that the Corporation clarify the language related to the hourly requirement as shown in **red** below:

"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 **at least two** scheduled stops**,** at ~~least hourly~~ **intervals that do not exceed 60 minutes,** during the times of 7am to 9am 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. Additionally, it must have been in existence and available for use by the general public as of the Application Deadline.

If at a later time, the Corporation seeks to implement a data-driven minimum number of daily stops, we respectfully request that you consider the following suggestions, based on our cursory review of the "Bus Stop Research" document, as you evaluate your approach:

- The transit point thresholds are determined and implemented based on county size. Accordingly, when analyzing the data, the Corporation should distinguish by county or by county size rather than by RFA, as some RFAs, such as SAIL, include counties of multiple sizes all of which have transit systems that vary greatly.
- Do not include all bus routes that have scheduled stops at a stop that was listed in an application, since Applicants are frequently not relying on all those routes to claim points, but rather only rely on those that meet the schedule requirements of Public Bus Stop. Instead, the dataset should only include routes that meet the current definition; the Corporation can then identify a minimum threshold by county.

- If it is not the Corporation's intent to reduce the number of stops or routes that are eligible, the threshold should not be determined by the average of prior winning applicants. By its nature, the average will almost always fall somewhere in the middle of the dataset and will therefore eliminate some routes.

In short, although we would support the Corporation's efforts to place more emphasis on Proximity and therefore future residents' access to transit and community services, we believe it is late in this RFA cycle to propose this change. We have some concerns about the methodology that informed the Corporation's proposed change and believe it is critical that stakeholders have the opportunity to review all the relevant data.

Thank you for your ongoing engagement with stakeholders throughout the RFA processes. Please do not hesitate to contact myself or Ken Naylor if you have any questions.

Hope you have a nice weekend.

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