

From: Jason Goldfarb <jgoldfarb@greenmillsgroup.com>
Sent: Thursday, April 11, 2019 5:15 PM
To: Marisa Button <Marisa.Button@floridahousing.org>
Subject: Public Comment - 9% RFAs

Dear Ms. Button,

Thank you for the opportunity to submit this public comment for your consideration.

We would like to propose FHFC revise the current Development Type "Midrise with Elevator (a building comprised of 5 to 6 stories)" to "Midrise with Elevator (a building comprised of **4 stories including an ESS Podium Structure**, 5 or 6 stories)" in RFAs that operate within Small/ Medium, Large and Miami Dade Counties and apply the .80 multiplier for purposes of the A/B Leveraging Classification.

Due to increased construction costs for an Applicant that selects the High-Rise or Midrise with Elevator (a building comprised of 5 or 6 stories) Development Type and selecting the Development Category of New Construction or Redevelopment or Acquisition and Redevelopment, the total Corporation funding amount is adjusted with a .70 and .80 multiplier respectively due to differences in construction costs.

We believe this rule in the RFA instructions makes the A/B Leveraging Classification a more level playing field for many of the submitted applications. However, there are no multipliers that can be applied for other unavoidable constructions costs. Some properties we have assessed allow a maximum height of four (4) stories resulting in having to build three stories over a Podium Structure to accommodate parking requirements and other land use issues. Developments that require this type of construction component within its design scheme creates an additional expense to the overall hard costs up to \$20,000 per parking space resulting in the application not being competitive from a A/B leveraging Classification standpoint.

Additionally, FHFC includes 4 Story Mid-rise as a Development Type that utilize an ESS Podium Structure definition and qualifies as ESS Construction along with 5 and 6 story with an ESS Podium Structure. So it seems natural that a 4 story Development Type would be included in with 5 and 6 story Development Type.

In many instances there are multiple benefits when integrating a podium structure including less surface parking outside of the building footprint allowing for more green space for the residents to enjoy and meeting open area/ wetland area requirements. This design layout can ultimately better the experience and functionality of the development overall.

Thank you,

Jason Goldfarb

Jason Goldfarb
Development Partner
Green Mills Group
[100 SE 3rd Ave](https://www.greenmillsgroup.com), FL 10, Ft. Lauderdale, FL 33394
O: 954.507.6222 | C: 305.807.8201
jgoldfarb@greenmillsgroup.com