



April 10, 2019

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

RE: Proposed Funding Goals for the 2019 Housing Credit Financing RFA For Affordable Housing Developments Located In Miami-Dade County – 2019/2020 RFA General Process

Dear Mr. Price and Ms. Button,

The Agenda provided for the April 2, 2019 Funding Process Workshop outlined the Corporation's contemplated funding goals for the Miami-Dade County Request for Applications (the "RFA") as follows:

It is expected that there will be enough funding for 3 Applications. There will only be 2 goals:

- *Keep the goal to fund one Elderly Development and the goal to fund one Geographic Area of Opportunity/ Small Area Difficult Development Area (SADDA) that selected the demographic of Family;*
- *Removal of the goal to fund one Non-Profit Application.*

As currently contemplated, the third application that will be funded in Miami-Dade will be the highest scoring application with the lowest lottery number. We recommend that the Corporation identify a third goal instead of leaving that third spot open to all types of applications. The 2018 Miami-Dade RFA had 67 applications, while the 2017 and 2016 RFAs had 30 and 25 applications respectively. Those RFAs with lower submission counts had additional goals that were more specific, which organically reduced the number of applications that were submitted and scored.

Setting more restrictive goals has been successful at both incentivizing the development community to address the public's needs and decreasing the number of applications submitted to the Corporation. We propose that the Corporation consider making that third goal a Transit Oriented Development ("TOD"). Below are some of the considerations and suggested guidelines for its implementation.

Considerations:

1. Why TODs are a fitting choice for this RFA:

- a. TODs provide better access to jobs and housing for people of all ages and incomes;
- b. TODs provide much needed connectivity for residents and businesses to have safer accessibility to jobs, businesses, residential and commercial districts, and schools;
- c. TODs reduce the number of household drivers;
- d. TODs lower congestion, air pollution and greenhouse emissions;
- e. TODs create walkable communities that accommodate more healthy lifestyles;
- f. TODs increase transit ridership and fare revenue;
- g. TODs expand mobility choices that reduce dependence on the automobile; and
- h. TODs reduce transportation costs.



Proposed Guidelines:

1. **Proposed TOD Definition for the RFA:** Transit Oriented Development (TOD) is a community development that includes a mixed-use of housing, office, retail space and/or amenities integrated into a walkable neighborhood that is located within ½ mile Metrorail stations or Public Bus Rapid Transit Stops.
2. **Proposed TOD Verification Process:**
Development must be located within ½ mile of any Metrorail Station or Public Bus Rapid Transit Stops. For Metrorail stations, the Corporation can rely on the official Miami-Dade County Metrorail Station map to determine which stations can be used by the applicants (<https://www8.miamidade.gov/transportation-publicworks/metrorail-stations.asp>). In the case of Public Bus Rapid Transit Stops, the current definition can continue to be used. As stated in the RFA, the coordinates used for Transit Services must represent the location where passengers may embark and disembark the bus or train.
3. **Proposed TOD Question for Exhibit A of the RFA:**
We propose adding a question in Exhibit A asking: “Does the Applicant certify that the proposed Development is located within the TOD areas identified in the RFA?” If yes, the Applicant would select a dropdown button and choose or write-in the Tri-Rail Metrorail Station or Rapid Transit Stop that would allow it to qualify. We also recommend a “Note” be added after the question that states: “In order for a proposed Development to qualify as a TOD Development for purposes of the 2019 RFA, it must (1) be located in one of the above areas, (ii) meet the scoring criteria outlined in the Proximity section of the RFA to achieve a minimum Transit Service score of 5.5 points (within 0.5 miles) based on the proposed Development’s proximity to a Tri-Rail Metrorail Station or qualifying Rapid Transit Stop, and (iii) have at least 50% of the proposed Development’s set-aside units located within the designated TOD Area.

Funding a development under the goal described above would provide housing that is responsive to the urban needs of Miami-Dade County residents while lessening the burden on Corporation staff by reducing the overall number of applications submitted.

Respectfully submitted,

Housing Trust Group, LLC,
a Florida limited liability company

By: 
Matthew Rieger, Manager