



Public Housing and Community Development

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August 13, 2020

Marisa Button
Director of Multifamily Allocations
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, Florida 32301

RE: 2020/2021 Miami-Dade Applications

Ms. Button:

Miami-Dade County's Department of Public Housing and Community Development (PHCD) has reviewed Florida Housing Finance Corporation's (FHFC) proposed changes for the 2020/2021 RFA process, as summarized in the March 5th, May 29th, and July 29th workshop agendas, and requests the following modifications as it relates to Applications in Miami-Dade County:

Allow Applicants who have a long-term ground lease with PHCD to qualify for the same considerations afforded to Applications with a PHA as a Principal

Unlike other Public Housing Authorities around the state, PHCD is unable to participate as a Principal in FHFC Applications. Although our Developments are subject to the same HUD requirements, such as Davis-Bacon, Section 3 and Environmental Clearance, we are unable to rely on the same considerations as those Applicants where a PHA is a Principal. We urge FHFC to extend eligibility for the PHA TDC Add-on, exclusion of certain costs in the TDC PU Limitation and PHA leveraging multiplier, to Applicants who have a long-term ground lease with PHCD.

Allow RAD redevelopments to qualify for the Family AOO goal in the Miami-Dade RFA

Through our ongoing portfolio-wide RAD conversion, PHCD will redevelop or renovate over 9,000 public housing units and through a mixed-finance approach, create 6,000 to 10,000 more affordable and/or workforce units. By August 2020, when the RFA is issued, we anticipate having procured experienced developers on many (8 to 14) of these large scale, multi-phased redevelopments. We urge FHFC to include a goal to fund a RAD public housing redevelopment. These redevelopments will preserve and supply new, quality housing subject to several design and development guidelines including PHCD's Natural Disaster Mitigation requirements and Sea Level Rise considerations, and HUD's Site and Neighborhood Standard review. This will ensure safe, modern, sustainable communities, as well as provide employment and job training to local residents and Minority-, Women- and Small-Business Enterprises. PHCD is under extreme time pressure to meet HUD deadlines to preserve the RAD subsidy awarded and many of our RAD developments may not qualify under any of the currently proposed goals.

Expand the Urban Center goal in the Miami-Dade RFA

The Urban Center District regulations were created by the County zoning code and exclude all but one incorporated area within our County, as incorporated areas all have their own code. Most notably, the City of Miami is entirely excluded. There are critical "urban centers" currently excluded by relying only on the County zoning designation, where compact, mixed-use, pedestrian-friendly areas and transit-oriented development will occur. To include these areas, where residents would have far greater access to jobs, services and transit, such as in the urban core of the City of Miami, FHFC should replace this goal or expand the criteria. We strongly urge FHFC to consider allow applicants that score max points for proximity to Public Rail Station, Public Bus Transfer Stop, or Public Bus Rapid Transit Stop to qualify for the goal and/or those located near a high concentration of jobs according to the US Census Bureau's OnTheMap tool.

Please contact me at 786-469-4106 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Michael" followed by a long, sweeping horizontal line.

Michael Liu