

August 14, 2020

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

RE: RFA 2020-203 Housing Credit Financing for Affordable Housing Developments Located in Miami-Dade

Dear Ms. Button:

I am writing to request that Urban Centers be granted an Area of Opportunity designation in the Miami-Dade RFA and therefore eligible for the 30% basis boost.

After reviewing all of the Tier One Urban Centers, I noted that a small portion of the Leisure City UC, as well as the Naranja UC, are neither SADDAs nor QCTs. Further, roughly a third of the Princeton UC and half the Gould's UC do not qualify for the boost and the Cutler Ridge UC is almost excluded in its entirety. Each of these regions will therefore be unintentionally excluded by FHFC for development.

As I believe FHFC's intent in creating the Urban Center goal is to target these areas that have been identified and encouraged (through zoning) by Miami-Dade County as areas for growth, it seems counterintuitive that they then be excluded from consideration by the development community because they lack the requisite designation. If the intent is truly to target these previously-identified areas, then providing them with the necessary tools to make the developments financially feasible is the critical final piece.

Thank you for your time and consideration of this request.

Sincerely.

Jennifer Sanz

VP, Development Programs

Pinnacle