



1400 Village Sq. Blvd.
Suite 3-250
Tallahassee, FL 32312
850/222-6000
www.floridacahp.org

May 22, 2023

Florida Housing Finance Corporation
c/o Jean Salmonsens
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

Dear Ms. Salmonsens,

At the recent Workshop, FHFC asked for stakeholder feedback on RFA 2023-203 Housing Credit Financing For Affordable Housing Developments Located In Miami-Dade County. In turn, CAHP convened a membership meeting recently and came to consensus on two recommendations with respect to the Miami-Dade RFA.

CAHP Recommendation #1: Reduce the minimum number of units required for developments located south of SW 224th Street.

In the past the Miami-Dade 9% RFA required a minimum of 110 total units for proposed Developments located in all areas of Miami-Dade County south of SW 224th Street. There are increasingly scarce land options that are able to accommodate this unit count. Inflation has also caused our unit counts to drop overall. CAHP recommends that Florida Housing reduce the 110 unit minimum to 100 units in order to recognize the effects of inflation and open up more sites as potential candidates under this RFA.

CAHP Recommendation #2: Designate TOD Areas around Metrorail and Transitway Bus Rapid Transit (BRT) stations; and make TOD Areas eligible for the Family GAO/SADDA Goal.

CAHP recommends that Florida Housing recognize TOD Areas located within a ½ mile radius around Metrorail stations¹ and around the 14 BRT stops that are being renovated along the South Dade Transitway.² (One-half mile distances are designated as Transit Oriented Development zones in both the City of Miami's code³ and Miami-Dade County's code.⁴)

CAHP recommends that Florida Housing then expand the Family Geographic Area of Opportunity/SADDA Goal to include Family TOD developments that have their Development Location Point located in a designated TOD Area.

We discussed several factors in formulating this recommendation to FHFC:

- Miami-Dade County's Urban Center designation, which is the basis of FHFC's Urban Center goal, excludes the most populated municipality in Miami-Dade County, the City of Miami, whose urban core provides significant access to transit, jobs, and services.
- Due to site availability, the Family Geographic Area of Opportunity/SADDA Goal areas have excluded the majority of the City of Miami's urban core. As a result, in the most recent Miami-Dade RFA, there were zero Family applications submitted in the City of Miami.

¹ <https://www.miamidade.gov/transportation-publicworks/metrorail-stations.asp>

² Miami-Dade County is making a significant infrastructure investment (which is currently in advanced stages of construction) in the renovation of 14 BRT stops on the South Dade Transitway: <https://www.miamidade.gov/transit/library/transitway-stations.pdf>

³ <https://codehub.gridics.com/us/fl/miami#/c057a08b-9b0e-4dc5-8792-1be7dc15fbee/9fe21dbf-4406-4285-9a53-7d21f70f4cce>

⁴ https://library.municode.com/fl/miami_-_dade_county/codes/code_of_ordinances?nodeId=PTIIICOOR_CH33CRATRSYEVZO

- In the most recent RFA, all but one Urban Center application submitted served the Elderly. As a result, Elderly allocations have outpaced Family allocations, and unincorporated Miami-Dade allocations have outpaced all other municipalities in this RFA.

Thank you for considering CAHP's recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'KEN' followed by a stylized flourish.

Ken Naylor
Chair
Coalition of Attainable Housing Providers of Florida, Inc.