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June 13, 2023

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

Dear Ms. Salmonsens,

At the June 6th RFA Workshop, FHFC discussed the draft of RFA 2023-203 Housing Credit Financing for Affordable Housing Developments Located in Miami-Dade County. In turn, CAHP convened a membership meeting and came to consensus on a recommendation with respect to the proposed Urban Center/MetroRail Station Areas of Opportunity goal. *CAHP recommends that Florida Housing recognize areas located within a ½ mile radius around all MetroRail stations and Tri-Rail stations.*

Factors discussed while formulating this recommendation to FHFC include:

- There is significant demand within proximity to any train station. None should be excluded from the goal.
- Density is typically much greater around the stations, which enables more of every type of housing within a given radius. (The zoning designations around the stations closest to the urban core of Miami are in very high density areas, where developments may occupy as little as ½ acre of land. Yet several very high density areas are excluded in FHFC's latest draft due to the number of existing developments within ½ mile of the station).
- As an example, if an Applicant can find a way to afford land near Miami's downtown core, such as the Brickell station, which is a very dense and service rich area, they should be able to qualify for the goal, regardless of the number of developments that exist within ½ mile radius.
- Tri-Rail stations should receive the same treatment as MetroRail stations; they provide residents access to services and jobs in Miami-Dade County, particularly parts of North Dade that might otherwise be unlikely to receive funding, and additionally extend into Broward and Palm Beach Counties.
- Coconut Grove and Vizcaya do not have any reasonably affordable land within ½ mile and so it is highly unlikely that an application could be submitted from those areas; that only leaves three stations that are eligible.
- Local residents living near certain MetroRail stations that were included in the draft RFA are already organizing NIMBY opposition efforts, which will ultimately affect the viability of developments near those stations.

Thank you for considering CAHP's recommendations.

Sincerely,

Ken Naylor

Chair

Coalition of Attainable Housing Providers of Florida, Inc.