



March 17, 2020

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 2020 Housing Credit Financing RFA For Affordable Housing Developments Located In Miami-Dade County – 2020/2021 RFA General Process

Dear Mr. Price and Ms. Button,

The Agenda provided for the December 12, 2019 Workshop to Discuss Possible Changes to the 2020-2021 Funding Cycle contemplated adding a new funding goal for the Miami-Dade County Request for Applications (the "RFA") as follows:

- Create a goal to fund one Development located in a designated Miami-Dade County Urban Center Zoning District in the Miami-Dade County RFA; Urban Centers are similar to what Florida Housing Finance Corporation ("FHFC") called Transit Oriented Developments (TOD Developments) in 2011.

We propose that FHFC consider revising the TOD Development definition and criteria that was presented. **The goal as currently contemplated excludes the City of Miami entirely from achieving this goal.** The Urban Center Zoning Districts are exclusive to unincorporated Miami-Dade County, leaving proposed developments within the City of Miami that are still Transit Oriented at a disadvantage. Below are some suggested guidelines for an implementation that would consider both City and County sites.

1. **Proposed TOD Definition for the RFA:** Transit Oriented Development (TOD) is a development located within ½ mile of existing 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. FHFC 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.

Funding a development under the criteria described above would provide housing that is responsive to the urban needs of all of Miami-Dade County and City of Miami residents.

Respectfully submitted,

Housing Trust Group, LLC,
a Florida limited liability company

By: 
Matthew Rieger, President/CEO