

From: Elena Adames [<mailto:eadames@ambarco.com>]
Sent: Monday, June 06, 2016 7:16 AM
To: Ken Reecy <Ken.Reecy@floridahousing.org>
Cc: Steve Auger <Steve.Auger@floridahousing.org>
Subject: RECAPs - Miami-Dade County

Good Morning Ken,

While we understand the policy intent behind discouraging development in RECAP QCTs, we believe in many ways Miami-Dade County is an anomaly. The first item to note is that RECAPs take into consideration Race, as well as Income levels in the QCTs. Miami-Dade County is a Minority Majority County, with approximately 85% of its population being minority.

In addition, while the local government preference would allow developments located RECAPs to participate in the RFAs, again Miami-Dade County is unique, because in addition to the County government, there are 34 municipalities. This many municipalities makes it almost impossible to have a county preference.

Lastly, I'd like to note that some of the RECAPs on the list provided by FHFC have a large number of Public Housing units, and the 9% LIHTC development can serve to elevate the income level of the particular QCT. Other RECAPs on the list were in areas that are prime for redevelopment opportunities, and areas where gentrification is taking place, already pushing families out of their neighborhoods and support network. This last point is the reason, I believe, that you also have some overlap in the RECAPs and 3 factor areas of opportunity, some QCTs meet both criteria.

We'd like to encourage FHFC to further analyze Miami-Dade County RECAP QCTs due to the unique circumstances described above.

Elena M. Adames
President
Ambar3, LLC
13611 S. Dixie Hwy., Ste. 374
Miami, FL 33176
305-216-1894