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Sent: Friday, March 29, 2019 2:32 PM
To: Marisa Button <Marisa.Button@floridahousing.org>
Subject: 2019/2020 RFA Comments

Marisa- Florida Housing's implementation of Areas of Opportunity is to be commended. You were wise to recognize that the new SADDA ZCTA system would excessively limit the areas of Florida where affordable housing could be both viable and competitive. By adopting 2- and 3-factor Areas of Opportunity you opened pathways for development in census tracts that would enable a distribution of affordable housing in ways that were less likely to have disparate racial impacts and that would meet existing needs.

As with any new system, though, we are recognizing that the 2- and 3- factor analysis is leaving some census tracts uncompetitive in RFA processes, despite compelling public policy reasons and demonstrated need for affordable housing in those census tracts. In particular, the existing system does not account for significant employment centers and economic drivers that often depend on residents of affordable housing communities for their workforce.

Because you have allowed local governments in Large Counties other than Miami-Dade to set priorities and designate Local Government Areas of Opportunity Funding, there is a mechanism to remedy this gap in every large county except Miami-Dade. We suggest that Florida Housing take limited steps to attempt to mitigate that gap for Miami-Dade County in the upcoming RFA cycle.

We are not suggesting a wholesale revision to the scoring system or to the 2- and 3- factor analysis. In the interest of time for the upcoming RFA cycle, we recommend trying a targeted approach this cycle that will open up additional sites where strong employment-based public policy justification exists. We suggest the following standards for inclusion of additional census tracts as Areas of Opportunity:

1. Limited to the Miami-Dade County RFA,
2. In (a) a census tract that contains a principal location of a Major Employer (or group of affiliated components of a Major Employer) on a single campus or related campuses, or (b) a census tract that adjoins a census tract described in clause (a) above, and
3. That is not a RECAP.

We suggest defining Major Employer as one of the five largest public employers or five largest private employers as identified by the Miami-Dade Beacon Council on its current website: <https://www.beaconcouncil.com/data/economic-overview/top-employers/>. The Miami-Dade Beacon Council, a public-private partnership, is the official economic development organization for Miami-Dade County and appears to be the most reliable independent source of information. (<https://www.beaconcouncil.com/about/who-we-are/>)

Adopting this test for the upcoming Miami-Dade RFA will allow for a potential competitive award to much-needed affordable housing in Miami-Dade census tract 29.00 near Jackson Health System (a top 5 public employer) and the University of Miami Health System, which

combine as one of the largest hubs of employment in the county. This area is abundant with employment and upward mobility opportunities and should not be functionally excluded from the Miami-Dade Tax Credit RFA, as it is under the existing SADDA and 2- and 3- factor Area of Opportunity methodology.

To allow residents in need of affordable housing access to this important Major Employer, we respectfully request that Florida Housing adopt a standard as described above and designate census tract 29.00 in Miami-Dade County as an Area of Opportunity in the upcoming RFA.

Thank you for your consideration

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