From: Rodrigo Paredes <<u>rodrigop@htgf.com</u>>
Sent: Thursday, June 6, 2019 10:30 AM
To: Marisa Button <<u>Marisa.Button@floridahousing.org</u>>
Subject: RE: Hourly Stops

Correction highlighted below.

Also, FHFC's proposed Mandatory Distance Requirement ("MDR") change is adequate. The intend of the MDR is to have developments from another developer cannibalize a development that is recently funded and therefore creating lease-up and stabilization issues. The exception is for developments that have the same financial beneficiary, who can submit more applications close to the recently funded and they run their own risk. Why would it matter if it's across the street or contiguous. The elimination or that requirement for the exception to take place makes sense and it's consistent with the fact that a multiphase development does not have to be across the street or contiguous.

Respectfully, **Rodrigo Paredes**  *VP of Development* <u>rodrigop@htgf.com</u> O (305)537-4704 | D (786)238-1131 3225 Aviation Avenue | 6th Floor Coconut Grove, FL 33133

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From: Rodrigo Paredes
Sent: Thursday, June 6, 2019 10:03 AM
To: Marisa Button <<u>Marisa.Button@floridahousing.org</u>>
Subject: Hourly Stops

Hi Marisa,

I was thinking about our conversation yesterday at the workshop.

I was proposing to make the "hourly" mean clock hours: i.e. one stop from 7 to 8, and another one from 8 to 9.

I had the example of 8:03 and 8:59, none from 7 to 8. That will qualify under the FHFC proposed definition "intervals of 60 minutes or less". Right? Nevertheless, it won't satisfy the people that have to take the bus early.

You brought up a good point as a counter argument to my proposition: a bus that stops at 7:58 and thereafter at 8:03 would satisfy my proposed definition, but will still not satisfy the intent of what I was saying. Nevertheless, your example will also meet the "intervals of 60 minutes or less". Right?

So, another way to deal with it, if you want to make it more clear, is to leave the definition as it was and capitalize "Hourly" to make it a defined term. The definition of "Hourly" could be: for a Bus Stop to have qualified hourly stops for purpose of the transit proximity score, Applicant's claimed scheduled stops shall be on each clock hour (i.e. 7am to 8am, another one from 8am to 9am), were the previous or next clock hour's claimed stop (i.e. 8am to 9am) shall run at a minimum of 20 minutes between each other or more, and a maximum of 80 minutes apart from each other.

Just an idea... I believe this definition will be crystal clear and not subject to interpretation. When it comes up in litigation, is black and white.

Respectfully, **Rodrigo Paredes**  *VP of Development* <u>rodrigop@htgf.com</u> O (305)537-4704 | D (786)238-1131 3225 Aviation Avenue | 6th Floor Coconut Grove, FL 33133

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