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May 26, 2020

Marisa Button  
Florida Housing Finance Corp  
227 N. Bronough Street, Suite 5000  
Tallahassee, FL 32301

via email

*Re: Comments to 2020/2021 Cycle – Proximity Points*

Dear Ms. Button:

Thank you for the opportunity to participate in the development of the 2020/2021 HC RFAs.

We urge you to reconsider the changes to the proximity point scoring proposed for the Miami-Dade and Medium/Small Geographic HC RFAs.

Whereas we appreciate and understand the good intent of reducing reliance on lottery numbers and maybe cut back on the number of applications submitted, we believe that the proposed addition of libraries and parks and the proposal to replace the current Proximity Funding Preference with a quintile system of scoring will have unintended negative consequences that will more than offset any benefit.

The proposed system will effectively require a site to score high in every category (transit and 6 services) to be competitive. Numerous excellent sites will be excluded and the cost of land will be driven up in the few locations that happen to win the proximity lottery as developers will be competing for these few sites. And such sites may be more expensive to begin with as larger cities tend to have more libraries and parks as well as higher land cost.

FHFC attempted this before but abandoned the idea after seeing that the undesirable effect mentioned above is in fact exactly what happened: a concentration of developments within small areas and at high land cost. The quintile idea is new, but will not change the unwanted outcome.

If you do decide to proceed with additional proximity services, we believe you should eliminate libraries. Libraries are becoming a thing of the past. Today, most services offered at a library are available on line making libraries less than essential and certainly not something you need to have around the corner. Secondly, libraries are relatively few and far apart exasperating the problem of concentrating viable sites in certain areas.

We appreciate your consideration.

Sincerely, 

Paul Bilton  
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