

Marisa – thank you for the opportunity to provide comment regarding the above referenced.

The March 5, 2020 workshop agenda for the 2020/2021 RFA Funding Cycle outlines for 3 funding goals in connection with the Miami-Dade County Geographic 9% RFA. One of those goals is to “**Fund 1 Development located in an Urban Center, with a preference that the proposed Development be located in a Tier 1 Urban Center**” (as defined). The language in the workshop agenda limited Urban Centers to those designated in the Miami-Dade County Comprehensive Plan. Further, the workshop agenda distinguished between Tier 1 and Tier 2 Urban Centers, with Tier 1 Centers primarily being those with less than 10 prior FHFC funded developments. This distinction between Tier 1 and Tier 2 Centers is appropriate, to facilitate diversification of FHFC’s portfolio. The goal of funding developments in urban areas with close proximity to mass transit and which propose pedestrian friendly design also makes sense.

However, restricting Urban Centers to properties designated in the Miami-Dade County Comprehensive Plan excludes properties located within ½ mile of many Metrorail stations, in the City of Miami, Miami-Dade County and other municipalities, and which have zoning designations that promote high density, pedestrian friendly developments. The City of Miami, for example, has an enormous unmet need of affordable housing, is centrally located and has an extremely high cost burden for housing. Further, the City of Miami has a TOD (Transit Oriented Development) designation for properties within ½ mile of existing Metrorail stations (see attached), which is consistent with the Urban Center goal outlined in FHFC’s March 5, 2020 agenda, but does not meet FHFC’s Urban Center definition because the City of Miami’s zoning code/regulations are separate from Miami-Dade County Comprehensive Plan. Properties within ½ mile of many Metrorail stations in other municipalities would also be excluded from FHFC’s Urban Center definition.

We strongly encourage FHFC to consider amending the definition of Urban Centers in connection with the Miami-Dade County 9% Housing Credit RFA to include properties that are within ½ mile of existing Metrorail stations, regardless of whether said properties are in the City of Miami, Miami-Dade County or other municipalities. FHFC could obtain a list of the existing Metrorail stations, and publish a location point for each such station, which would be used by applicants to confirm that the DLP of a given application is within ½ mile of the given Metrorail station. As an alternative, FHFC could issue a Local Government Verification of Qualification TOD form, similar to that used in FHFC’s 2011 Universal Cycle, which applicants would have executed by the appropriate local government official.

Thank you in advance for your consideration.

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