

From: Kenneth Naylor [<mailto:knaylor@apcommunities.com>]
Sent: Friday, October 31, 2014 3:04 PM
To: Steve Auger; Ken Reecy
Cc: Liz Wong
Subject: Miami-Dade County RFA Comments

Below please find some suggestions regarding the Miami-Dade County RFA:

- 1) FHFC should considering establishing a **minimum unit count for Miami-Dade projects of at least 100 units**. Larger projects are less likely to have Net Operating Income declining over time, which is an important component of the long term viability of these developments. In Miami-Dade county in 2013, the ratio of applicants to allocatees was approximately 50:1; a 100 unit minimum would reduce the volume of applications and help ensure that the winners are built to last.
- 2) If FHFC wants to encourage garden style development in central and northern Miami-Dade County, it should encourage scattered site developments; in order to accomplish this I would recommend that FHFC **revert to the 2013 scattered site rule**. By letting the market decide the appropriate minimum distance between sites, you will allow more garden style applications to be created in Dade County.
- 3) **Raise the bar on proximity**. Although no one wants a repeat of the 2011 cycle, in Miami-Dade there is clearly room to increase the quality of the sites submitted to Florida Housing without increasing land costs. If FHFC wants to encourage garden style development, it can give garden style sites a boost or establish a goal of funding a garden style site.

Thank you for your time.

Best,

Ken

KENNETH C. NAYLOR

2950 S.W. 27th Avenue, Suite 200 | Miami, FL 33133
Office: (305) 357.4713 | Fax: (305) 476.1557
[E-Mail](#) | [V-Card](#) | [Website](#) | [Facebook](#) | [Twitter](#) | [LinkedIn](#)



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