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September 15, 2016

Steve Auger, Executive Director
Florida Housing Finance Corporation
227 N. Bronough Street
Suite 5000
Tallahassee, FL 32301

Dear Mr. Auger,

Thank you for the opportunity to comment on the most recent draft of RFA 2016-112 SAIL Financing for the Construction of Workforce Housing. In this initial draft, there is a 5 point preference for sites located along the Route 301/Dade-Monroe Express, in addition to the proximity points available for Transit. This practically ensures funding of a development along this Route. The proximity of the preference locations listed in the RFA creates a very small area of development and may have unintended consequences.

All 19 bus stops listed are within an area 1.5 miles long, which makes sense for a bus route, however 17 of the 19 bus stops fit within a radius of 0.6 miles. Accordingly, the concentration of bus stops will drive up prices similar to previous Miami-Dade RFAs which had such a narrow geographic focus (i.e. TOD). This has the unfortunate consequence of reducing the number of units ultimately built because more development dollars will be allocated to land which is a non-eligible expense.

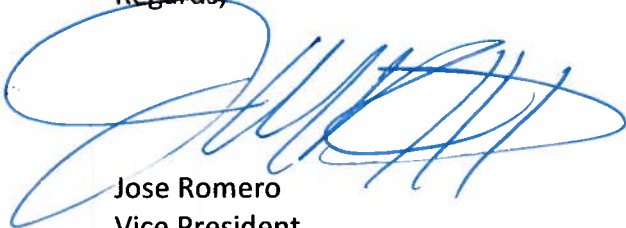
Florida Housing has also put in a preference in this RFA for developments South of 288 ST which is a new additional line that has not been previously used in any RFA to date. The current Miami-Dade RFA draft and previous RFAs have established the line at 224 ST. Although the distinction between Northern Miami-Dade and Southern Miami-Dade makes sense given the overall size of the county, any additional line seems arbitrary and unnecessary, as others have argued. Currently the new additional line in this RFA is set at 288 ST. The difference between 288 ST and 224 ST is a 5 minute drive and part of the same general area that provides much of Monroe's workforce. Personally, I know this area very well, as I grew up on 272 ST, went to grade school at 320 ST, and my parents worked on 260 ST. Especially when considering Workforce Housing tenants that may work in Key Largo, the closest Key to Miami-Dade, the drive time would be 40 min. vs 45 min., only 5 more minutes, from 288 ST and 224 ST, respectively. As you know, most Miami-Dade commute times for Workforce Housing families exceed 45 minutes and in many cases double that time each way. For consistency, and to not

punitively double penalize an area already in much need of housing, we recommend you change the line to 224 ST in line with previous and current Miami-Dade RFAs.

Lastly, it is unlikely that all tenants in the development funded regardless of where it is located will only work in Monroe. Locating a development in Southern Miami Dade will increase the likelihood that some of these tenants will work in Monroe since the commute time from Miami is favorable, as discussed earlier. Therefore, FHFC should consider the job opportunities for the other tenants as well. The best access to job centers using mass transit in Miami is the Miami-Dade Busway and these dedicated lanes that lead to the Metrorail. This Busway can beat a commuter driving to downtown by at least 30 min. during peak times, and up to 60 min. when it is raining, which is a common occurrence here in South Florida. We believe FHFC should give the same preference for sites located within their standard ½ mile or less radius of the Busway south of 224 ST. We believe this gives all tenants the best access to job opportunities, reduces the unintended consequence of increased land prices by adding excellent transit oriented sites, while at the same time increasing the likelihood tenants will work in Monroe and help alleviate the incredible need there for Workforce Housing.

We applaud Florida Housing for their initiative to fill this much needed gap in housing in both Miami-Dade and Monroe. We look forward to the revised RFA and thank you for your consideration of our concerns and proposed solutions above.

Regards,



Jose Romero
Vice President
Housing Trust Group

Cc: Ken Reecy, Multifamily Development Director