

From: Rodrigo Paredes [<mailto:rodrigop@htgf.com>]
Sent: Wednesday, September 21, 2016 5:28 PM
To: Steve Auger <Steve.Auger@floridahousing.org>; Ken Reecy <Ken.Reecy@floridahousing.org>
Cc: Matthew Rieger <mattr@htgf.com>
Subject: Comment regarding Miami-Dade Geo RFA

Thank you for the opportunity to submit comments.

We respectfully request that FHFC considers the following:

1. Removing the funding preference for the Family Demographic requirement.

At the Geo Workshop it was mentioned that the preference was to fund 2 out of 3 developments in the Geographic Areas of Opportunity (SADDAs, 2 and 3 factors, or “Geo AOO”), however, no mention was made regarding the preference for these to be only of the Family demographic. This came as a surprise for some developers who have, for various reasons, devoted significant resources to certain Elderly-only sites.

Accordingly, we recommend not limiting the goal to just Family developments. Populations in Miami-Dade have been trending older since the year 2000^[1]. Also, *“Nonfamily households are defined as having unrelated people living together or a person living alone. This group made up the largest segment of households in poverty in Miami-Dade, accounting for 44.3 percent of the total (79,400 households). Elderly nonfamily households with a householder 65 years of age or older represented 43 percent of all nonfamily households in poverty (34,300 households).”*^[2]

Therefore, we recommend that both Geo AOO goals are not Demographically restricted, as per the Workshop, and that the 3rd Development to be funded (which is not necessarily a Geo AOO), can be restricted to Family, if the Corporation deems it necessary or advisable. If the Corporation deems it necessary or advisable to fund two family developments in the Geo RFA, we recommend that at least one of the Geo AOO goals be an Elderly development, and the other Geo AOO goal be a Family development.

2. Clarifying the definition of “North Miami-Dade Areas of Opportunity” (or “NMD AOO”).

Section Two of the 9-15-16 draft RFA defines NMD AOO as: *“All areas of Miami-Dade County located north of SW 224th Street, **excluding** HUD designated DDAs, HUD-Designated QCTs, and 2- or 3- Factor Areas of Opportunity.”*

The word “excluding” may be a typo, and should probably be replaced with the words “which are”. Otherwise, all Miami-Dade County areas north of SW 224th will be eligible for the 30% boost and the increased request max amount, regardless of whether it is Geo AOO or not. Is that the Corporation’s intention here?

If that is the Corporation’s intention, then according to the Selection Process on page 46, if the first and second application funded are not in the Geo AOO goal, then the first and/or second app funded will be just the opposite: **not** a Geo AOO site, which happens to be north of SW 224th St.

Footnotes:

^[1] <https://www.miamidade.gov/planning/library/reports/2010-census-demographic-housing.pdf>

^[2] <https://www.miamidade.gov/business/library/reports/2013-income-poverty.pdf>

Thank you.

Rodrigo Paredes
Housing Trust Group
3225 Aviation Ave, Suite 602
Coconut Grove, FL 33133
305-537-4704
www.htgf.com