



September 26, 2017

Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Proposed Leveraging Changes (September 13, 2017 Listserv message)

Dear Executive Director Price,

We support the Corporation's A/B Leveraging concepts which were proposed in the September 13, 2017 (12:53pm) Listserv message. The proposed Leveraging leaves the A/B cut-off at Eighty percent (80%) and modified certain multipliers. We hereby recommend adding a fourth (4th) multiplier in the Miami-Dade GEO RFA for high-rises with structured parking.

In the vast majority of the cases, available Miami-Dade County sites in the urban core are small (less than 1.5 acres). They have high-density zoning, but: i) have higher land-prices on a per unit basis; and ii) leave little to no room on the site for ground-level parking. These facts force the majority of new construction affordable housing in the urban core of Miami-Dade County, near the main employment centers, to have structured parking.

Structured parking means that the concrete gross construction square footage increases about 400SF per parking space (considering the parking circulation roads and ramps and the parking space area itself) and this extra square footage is added to the overall Construction Cost. Since parking structures must usually be added in the *podium* form (floors of parking underneath floors of apartments), these high-rises have heights above 75 feet, which triggers the need for costly pressurized corridors and much more expensive Fire and Life Safety Building Code regulations.

The result is that the construction cost of a high-rise with structured parking is approximately 1.4 times the cost of a high-rise without structured parking.

Accordingly, if the high-rise with no structured parking multiplying factor is 0.700, the new high-rise with structured parking multiplying factor should be no greater than 0.615.

For some time now, the Corporation has incentivized new construction development in the urban core near main employment centers and if a new multiplying factor is not created, there will continue to be more Garden Style applications in the southern part of the County, which will push the applications in the urban core of Miami-Dade into Group B leveraging. As the Corporation is aware, the need for affordable housing in the urban core of Miami-Dade County is immense, the County is large and the southern part of the County is simply too far away and commuting times are far too long for low-income tenants to drive to the urban core of Miami for work each day.

Please consider the following as a starting point for the definition of Structured Parking: "a concrete structure that covers at least 75% of the parking spaces required by the applicable zoning regulation."

Respectfully submitted,
Housing Trust Group, LLC,
a Florida limited liability company

By: 
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