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**Sent:** Monday, July 11, 2022 9:59 AM  
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**Subject:** Comments to RFAs 2022-203 & 2022-205

Thank you for the opportunity to comment on the 2022-203 and 2022-205 RFAs.

I'd like to recommend removing the Mandatory Distance Requirement in Miami-Dade County for all Family and Elderly developments that apply under the 2 RFAs mentioned above. Below I list some facts and anecdotes as to why we think the original intent of too much competition in an area prior to stabilizing developments should no longer be a concern.

- As it's been well documented, there is a Housing Crisis, and in particular in Miami-Dade a Housing emergency has been declared by the County Mayor. Below are links to the Mayor's press releases on the subject.
- I've also included a link to the Miami-Dade HFA's Occupancy Report. As per FHFC's own data on occupancy in Miami-Dade and the link below, the overall occupancy over the past 3-5 years, including during the Covid-19 pandemic, properties in Miami-Dade consistently performed above 97% occupancy.
- When the proximity to other developments was initially introduced, average size of a development was about 180 units, since then, especially in the urban areas, the average development is 110 units.
- We opened the waiting list to a new 210 unit Development in December 2021, to date, still 6 months away from completion, we have over 300 applicants and growing daily.
- Our workforce development in Florida City has been 100% pre-leased since completion in 2020, and with an active waitlist, including the 80% units.

<https://www.miamidade.gov/releases/2022-06-30-mayor-housingsummit-finalrelease.asp>

<https://www.miamidade.gov/releases/2022-04-08-mayor-housing-crisis.asp>

<https://amp.miamiherald.com/news/local/community/miami-dade/article262956308.html>

[https://go.boarddocs.com/fl/hfa/Board.nsf/files/CCLH7C471647/\\$file/1-January.pdf](https://go.boarddocs.com/fl/hfa/Board.nsf/files/CCLH7C471647/$file/1-January.pdf)

Appreciate your consideration,

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