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Topic	Entity/Developer	Comment	PHCD Response
Funding Amounts by Category			
	Model City Community Advisory Committee	The Model City CAC proposes that the 2018 Documentary Surtax be administered with the well-being of the homebuyer and the developer equally considered. Keep in mind that Miami-Dade doesn't reap any benefit from a housing unit until a buyer can live there and earn enough income to participate in Miami-Dade economy. For this reason, the 2018 Documentary Stamp Surtax will distributed in the manner of the attached Table 1: FY 2018 PROPOSED SURTAX/SHIP FUNDING ALLOCATIONS PERCENTAGES Category Proposed % Multi-Family Rental Countywide 38.8%; Multi-Family Workforce Developments 6.0%; Liberty City Small Housing Project Set-Aside 3.7%; Elderly Housing Developments 9.7%; Public Housing Developments 15.5%; Homeownership Activities 4.7%; Disadvantaged Homebuyer Assistance and Foreclosure Relief 21.6%	For purposes of this RFA funding is allocated based on community needs and state statutory requirements.
	The Cornerstone Group	Funding Amount: The County received approximately $40 million per annum in Surtax funds. Of that, 35% is for homeownership. Per statute, any homeownership or rental Surtax funds not used the prior year is carried forward to the next year. For 2018, the amount of rental funds available should therefore be approximately $29.25 million: Annual Surtax $40 million; Carryforward from prior year $11 million (1); Total $51 million Less PHCD Administration -$4 million; Liberty Square -$2 million; Net $45 million Rental $29.25 million; Homeownership $15.75 million Recommendation: Utilize RFA 2017 $11 million of homeownership funds for this RFA, none of which was awarded in 2017.	For purposes of this RFA funding is allocated based on community needs and state statutory requirements.
Submission Requirements			
	Stone Soup Development	Must applicants provide 7 copies/binders for each application?	Yes. PHCD requires a total of 7 copies (1 original and 6 copies) to allow enough copies for the evaluation committee to review, with 1 copy for PHCD's records retention.
Liberty City/Brownsville Set-Aside			
	Model City Community Advisory Committee	The County went outside the Model City Boundaries by extending the boundary from I-95 east to NE 6th Ave, East Little River Canal and NE 4th Court. The boundary for Liberty City should reflect the TUA boundaries.	For purposes of this RFA, boundaries identified for Liberty City set-aside funding, are inclusive but not limited to the Model City Neighborhood Revitalization Strategy Area boundaries.
Timeline of RFA Release/Application Deadline			
	The Cornerstone Group	The application deadline proposed is May 2nd. The FHFC 2017 cycle applications were due in fourth quarter 2017, and will be awarded at the FHFC May 4th Board meeting. Pursuant to the workshop last week, it appears that PHCD requires an invitation into credit underwriting for the RFA 2018 application, to be considered a firm commitment (which is threshold). The invitation into credit underwriting letter comes approximately 10 days after the FHFC Board meeting. The Surtax/SHIP RFA has always been due to PHCD after the FHFC has announced their awards, so that those County RFA funds can be leveraged with other outside funds. Recommendation: The RFA 2018 deadline be moved from May 2nd to May 16th. Moving the RFA deadline to May 16th still would make the 2018 cycle one of the earliest PHCD cycles in the past 20 years.	As a resource for the development of affordable housing, PHCD makes Surtax funding available on an annual basis through a competitive process.
	Landmark Construction, Centennial Management Corp.	Can PHCD consider delaying the Surtax RFA application period for 1-2 weeks, to allow time for applicants to know if their applications to Florida Housing Finance Corporation are funded? This may allow a larger number of approved 9% LIHTC applications in the Miami-Dade area.	As a resource for the development of affordable housing, PHCD makes Surtax funding available on an annual basis through a competitive process.

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Site Control			
	The Cornerstone Group	Site Control Recommendation: That the application provide 5 additional points for projects that are owned by the Applicant. Applicants that have invested millions of dollars in their site are committed to the site and have demonstrated that by not merely signing a Purchase and Sale Agreement, but rather by moving forward and making that commitment to the property and its development. They truly are ready to proceed, don't need to renegotiate terms, don't need the seller's signature for permit applications and other documents required to get building permits on the parcel.	For purposes of this RFA, sufficient proof of site control is defined on page 10 of both the Multifamily and Homeownership RFA's.
	Community Development Consulting	Site Control: While continuing to require typical site control at the time of application, allow for a shorter, more realistic, purchase contract period and the substitution of properties prior to closing (most relevant with scattered sites). I was able to do this in a different jurisdiction (a project I did in Mississippi after Katrina) and it worked well. It addresses the reality of the difficulty and cost of holding single-family properties for as long as it takes to get from application to closing. But, it still requires developers to show that they can get site control.	For purposes of this RFA, sufficient proof of site control is defined on page 10 of both the Multifamily and Homeownership RFA's.
Maximum Sales Price			
	Community Development Consulting	Sale Price/Appraised Value: In lower income neighborhoods, appraised values/sales prices often are insufficient to cover the cost to build, particularly if you have to pay for land and/or site development. (We're still encountering this, for example, in Florida City.) In the past, we've covered the difference with grant funds; but, of course, the availability of those is always limited. Maybe, SHIP funds could be combined with Surtax: SHIP covering the difference between cost and appraised values/sales prices and Surtax covering a portion of the construction financing. Another approach is that SFCDC has attempted to address the issue by proposing allowing appraisals for the County funds to be based on cost to build, allowing higher sales prices (up to the max). The use of Surtax mortgages (again, only up to the max) helps to maintain affordability. This approach could also be considered. It could also help to increase values in the neighborhood, ultimately making it no longer necessary.	For purposes of this RFA, PHCD will adhere to the rules set forth by the Board of County Commissioners (BCC) with resolution number R-1324-08 establishing the maximum sales price for homes sold under the County's Affordable Housing Development Programs, as such changes to this policy requires BCC approval.
	Community Development Consulting	Sales Prices: Explore rational benchmarks for determination and ongoing revision of maximum sales prices. The attached new HUD HOME program benchmarks, based on 95% of the area median purchase price, would be one approach. It even provides a duplex maximum. But, it doesn't distinguish between smaller and larger single-family units. You could take the same approach (95% of area median sale price), except on a square footage basis. Of course, in the lower income neighborhoods, a higher sales price may still not appraise; so, that needs to be addressed by the point above.	For purposes of this RFA, PHCD will adhere to the rules set forth by the Board of County Commissioners (BCC) with resolution number R-1324-08 establishing the maximum sales price for homes sold under the County's Affordable Housing Development Programs, as such changes to this policy requires BCC approval.

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	South Florida Community Development Corporation	Appraisal & Sales Price Limitations: Low appraised values can limit the availability of financing for construction and home purchases. In some areas of the County, appraisals have been adversely impacted by a large number of foreclosures or lack of investment and recent comparables. This creates scenarios where the cost of construction is higher than the appraised value of the property, creating an appraisal gap. Additionally, construction costs are currently impacted by the need to address additional impediments such as water/sewer upgrades, sidewalks and development variances. This adds to the construction costs. Currently, the maximum sales price is established by the Miami-Dade Board of County Commissioners. The maximum sales is $205,000 for County conveyed lots and $215,000 for private lots or appraised value, whichever is lower. Recommendations: Use Surtax funding to cover appraisal gaps, in the form of deferred forgivable mortgages, for properties where construction costs have exceeded the appraisal value. Appraise single-family homes based on market cost and not market value. The deferred mortgage should be forgiven/satisfied at the time of resale, based on a current market value appraisal. Where appropriate, shared equity with homebuyer should be considered as well. The County should consider indexing the infill program's maximum sales price to HUD's maximum sales price, which is published each year. The County's maximum sales price could be based on a portion of that number. Adjustments to price will require deeper subsidies for low to moderate income homebuyers to close the affordability gap. It will allow the program to address current construction costs for quality and sustainable homes, account for multi-unit single family homes, and address appraisal gaps.	For purposes of this RFA, PHCD will adhere to the rules set forth by the Board of County Commissioners (BCC) with resolution number R-1324-08 establishing the maximum sales price for homes sold under the County's Affordable Housing Development Programs, as such changes to this policy requires BCC approval.
	Stone Soup Development	For Homeownership deals - PHCD should recommend to the County Commission (and we will support your efforts) that the current maximum sales price for Surtax of $205,000 and $215,000 per unit is financially infeasible for new development. Rather, we recommend that the Surtax program should simply adopt the County FHA standard for maximum sales price - which is adjusted annually and therefore doesn't need to be artificially raised by Commission. For this RFA we recommend putting in up to $60,000 to $70,000 of Surtax per unit as a grant - in essence buying down the sales price to current standard of $205,000 or $215,000 per unit. Finally, just as you do for all rental deals, you should allow funding for homeownership projects to stay in the deal and convert from construction to permanent financing for qualified buyers.	For purposes of this RFA, PHCD will adhere to the rules set forth by the Board of County Commissioners (BCC) with resolution number R-1324-08 establishing the maximum sales price for homes sold under the County's Affordable Housing Development Programs, as such changes to this policy requires BCC approval.
Threshold			
	J. L. Brown Development Corporation	I dont have audited financial statements, and I have not built 240 units in the past few years. I have site control, architectural plans ready for permitting, interested buyers and bank committment and the ability to proceed. I need to find a way to meet the threshold requirements. The way the application is structured, a new small developer will never be awarded anything even with an excellent project.	For purposes of this RFA, an applicant must provide Audited or Certified Financial Statements, certified by an independent 3rd party auditor, which cannot be performed by an affiliate or staff member. All Minimum Threshold requirements can be found on page 12 of the Homeownership RFA.
Definitions			
	J. L. Brown Development Corporation	Under the application checklist Tab 6 part II Development Team: It refers to Developer, Developer Principal or Sponsor. Who can be a sponsor? I have another question regarding Development Team. I am trying to add a sponsor to my team that has more development experience in the past few years since my company is just restarting. I have read the definition but still not sure of a few things. Does the sponsor need to be a partner of can the sponsor on the Management Team under contract providing a key form of Management in the project.	A Sponsor is any individual, association, corporation, joint venture, partnership, trust, local government, or other legal entity or any combination thereof which, has been approved by the corporation as qualified to own, construct, acquire, rehabilitate, reconstruct, operate, lease, manage or maintain a project; and except for a local government, has agreed to subject itself to the regulatory powers of the corporation. See definitions on page 10 of the Homeownership RFA.

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Homeownership RFA			
	Stone Soup Development	Why not let homeownership developers transfer the construction Surtax to the qualified buyers as a permanent subsidy?	Per state statute, the proceeds of surtax shall not use be used for rent subsidies or grants. F.S. 125.0167(3).
	Stone Soup Development	In reading your guidelines it looks like that for homeownership Surtax is only a source of construction financing - correct? In other words, it is not a source of permanent financing to assist qualified buyers?	Correct. PHCD offers assistance to buyers through its First-time Homebuyer Program.
	Stone Soup Development	On page 39 of the homeownership application, 2 Income Targeting. Because different agencies have different standards; could you please give the Area Median Income ranges for each of the categories?	Income levels are defined in the RFA's in the definitions section under "income level." They are as allows: • Moderate Income is above 80% AMI to 140% of AMI • Workforce Housing Income levels are 60% to 140% of AMI • Low – Income is 80% or below of AMI • Very Low – Income is 50% of AMI or lower • Extremely Low - Income - 33% of AMI or lower or as more specifically defined in the Florida Housing Finance Corporation's (FHFC) RFA.
	Model City Community Advisory Committee	After participants complete the course and receive their certification of completion. Reverse the process of going to the bank first, should be able to submit the certificate to the County, receive their subsidy up to $80,000 and take that with the certificate to receive the bank loan.	Per state statute, the proceeds of surtax shall not use be used for rent subsidies or grants. F.S. 125.0167(3). PHCD offers homeownership assistance through its First-time Homebuyer Program.
	Model City Community Advisory Committee	Add disadvantaged homebuyer assistance and foreclosure relief to the Homebuyer counseling RFA	The Homebuyer Counseling RFA allows PHCD to partner with agencies who offer homebuyer education which is inclusive of foreclosure prevention education. For purposes of this RFA funding for foreclosure does not meet our intended objective to provide homebuyer education.
	South Florida Community Development Corporation	Homebuyer Purchase Assistance To encourage additional non-profit and small for-profit developers to participate in the homeownership programs, the County will also need to ensure that potential homebuyers can be qualified for purchase assistance in time to close when new units are ready. The County's homeownership construction and purchase assistance programs are dependent on each other, must be coordinated and expedient for buyers and sellers of the new homeownership units.	PHCD partners with developers, lenders and homeownership counseling agencies to assist potential homeowners homeownership assistance. Information on PHCD's First-time Homebuyer Program can be found at www.miamidade.gov/housing.

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	Model City Community Advisory Committee	Set aside allotments for foreclosure relief	For purposes of this RFA funding is allocated based on community needs and state statutory requirements. Previous foreclosure intervention funding, administered by Neighborhood Housing Services of South Florida, under the state funded “Hardest Hit” program no longer exists. Instead, foreclosure intervention in the form of education on the consequences and alternatives of foreclosures and providing assistance with loan modifications, ensuring best outcomes for the homeowner is available.
	Model City Community Advisory Committee	Set aside allotments (forgivable loans) for the purpose of rehabilitation to residents with distressed properties mortgage in arears and to help prevent foreclosures	For purposes of this RFA funding is allocated based on community needs and state statutory requirements. Previous foreclosure intervention funding, administered by Neighborhood Housing Services of South Florida, under the state funded “Hardest Hit” program no longer exists. Instead, foreclosure intervention in the form of education on the consequences and alternatives of foreclosures and providing assistance with loan modifications, ensuring best outcomes for the homeowner is available.
	Model City Community Advisory Committee	An occupation training component to be activated with this initiative to create skill and job training	Funding for economic development and job training is made available through Miami-Dade County entitlement's Community Development and Block Grant funding. Additional information can be found at www.miamidade.gov/housing.
	South Florida Community Development Corporation	Access to Construction Loans Nonprofit and small for-profit developers usually can secure construction loans that are 70% to 75% of project value. The 25% to 30% gap can be challenging to overcome. Miami-Dade County provides homebuyer assistance up to $80,000 depending on household income and other factors. The funding, which is ultimately tied to the unit, is only available at closing on the sale of the unit by the homebuyer. Recommendation: Modify the current Surtax procedures to allow loans, to qualified developers, to be used to pay a portion of the construction cost not funded by the private lender. Such loans would be paid back to the County at the homebuyer closing using a portion of the sale proceeds. These repaid funds would then simultaneously be rolled over by the County into the separate Surtax purchase loan to the buyer. Doing this would allow the same funds to be used twice without increasing the total amount of County funds allocated for the housing unit. Also, this would provide smaller developers with the 25% to 30% gap funding needed to secure more private lender construction loans. Example: Hypothetically the County might authorize an $80,000 Surtax loan to a homebuyer to be applied towards the purchase price at closing. The cost to construct the unit is $100,000 but the bank will only loan the developer $70,000 (leaving a $30,000 gap). Out of the Surtax funds already earmarked for this unit, the County could loan $30,000 to the developer. It would be administered by the County in the same way that it administers all of its other construction loans. This includes holding funds in escrow and releasing upon proper inspections.The loan would be repaid by the developer at closing using a portion of the sale proceeds. The funds would then be simultaneously rolled over into the $80,000 County 2nd mortgage purchase loan being made to the buyer. The repayment by the developer and the roll over to the home buyer would be a paper transaction with no cash changing hands at the closing.	What is being proposed can be accomplished with PHCD's Second Mortgage Program. PHCD will take this comment into consideration for future programs.

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	Community Development Consulting	Homeownership application, page 35 - Part II Development Team, 2. Management Agent or Principal of Management Agent. Management Agent is N/A for homeownership; you could just leave it and note it. Given that this is a homeownership application there is no Management Agent. I believe that this is a holdover from the rental application and should probably be removed.	The Homeownership RFA has been updated to reflect the omission of Management Agent or Principal Management Agent as part of the Devolvement Team on page 35.
	Community Development Consulting	Funding Request Cap: As discussed at the Roundtable, increase to a higher percentage of Total Development Cost during construction. (With homeownership, it would only be during construction; so, it warrants a higher percentage than long-term rental.) This can greatly expand the capability of a private sector construction loan commitment.	Limits to Total Development Costs is not applicable to the Homeownership, the RFA has been updated accordingly.
	Community Development Consulting	Revolving: Allow for the construction loan to be repaid at closing on sale of the home and revolve to another unit. You would still have limitations on the term of the loan and when the final unit can be started. So, it's out for a finite timeframe; but, it can cover more units.	PHCD is seeking applications that demonstrate the best use in terms of leveraging and the lowest risk when using County funds. Full principal is due at sale of a housing unit. See Loan Term and Conditions on page 20.
	Community Development Consulting	Page 36: Eliminate latitude and longitude coordinates (just require addresses and folios); that's for land where the area is undeveloped, virtually, not applicable for Miami-Dade.	PHCD has taken out the requirement to provide latitude and longitude coordinates in the Homeownership Request for Applications. However, the requirement to provide latitude and longitude coordinated remains in the Multi-Family Rental RFA.
Financial Beneficiary			
	The Cornerstone Group	Financial Beneficiary: In the past, the PHCD RFAs have limited how much each financial beneficiary can receive as a percent of the cycle or as a total dollar amount. This is why the Financial Beneficiary form is required to be submitted in the RFA application. Recommendation: No financial beneficiary receives more than say 25% of the rental funds and/or no more than say $7 million total funds in the cycle.	Both Multifamily and Homeownership applications require the disclosure of financial beneficiaries on pages 48 and page 43 respectively. PHCD has determined no changes are needed at this time.
Scoring Criteria			
	Stone Soup Development	I found a possible error relating to the minimum score for threshold - on page 17 for the Rental RFA it says the minimum score is 70 points, but on your score sheet on page 63, the maximum possible score is 72 points - this can't be correct.	Changes to the scoring for both Multifamily and Homeownership applications have been modified accordingly. See pages 52-69 in the Multifamily application and pages 45-47 in the Homeownership application.
	Stone Soup Development	Similarly, on the Homeownership RFA you also have the minimum score for threshold as 70 points and I believe it should be lower.	Changes to the scoring for both Multifamily and Homeownership applications have been modified accordingly. See pages 52-69 in the Multifamily application and pages 45-47 in the Homeownership application.

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	Stone Soup Development	In Experience of the Developer Team, you have up to 13 points for developers completing at least 1000 units, and then 2 additional points for what you call "Recent Experience" which only considers projects finished in the last four years. We view the second requirement of Recent Experience (counting only project completed in the last 4 years) as discriminatory to most nonprofit developers as well as to smaller for-profit developers. Given that if often takes 3-4 years to complete a project, four years is too short a time period. To further bolster our argument, we have attached the FHFC 2018 Rule and Chapter, and if you refer to the bottom of page 11 and top of page 12 they consider an experienced developer as one who has completed projects since 1998 and recent experience since 2008. So FHFC considers recent experience for the past 10 years and you only consider the past 4 years. Why would you have a standard that is more than twice as restrictive as FHFC, especially given that they are providing the lion's share of the funding? We urge you to amend your RFA and adopt a definition for Developer Experience that is consistent with the FHFC standard. Or at least increase recent experience to 7 years.	For purposes of this RFA, PHCD will continue to use projects completed in the last four years to define "recent Development Team experience."
	Community Development Consulting	In the Homeownership RFA, only 86 points possible (57 base points plus 29 bonus points); need 70 points for threshold; that's very tight; contrasts with 120 possible for Multi-Family Countywide rental.	Changes to the scoring for both Multifamily and Homeownership applications have been modified accordingly. See pages 52-69 in the Multifamily application and pages 45-47 in the Homeownership application.
	Community Development Consulting	In the draft Small Developments - Multifamily Rental RFA: Only 102 points possible (75 base points plus 27 all bonus points): need 70 points for threshold; contrasts with 120 possible for Countywide rental	Changes to the scoring for both Multifamily and Homeownership applications have been modified accordingly. See pages 52-69 in the Multifamily application and pages 45-47 in the Homeownership application.
	Community Development Consulting	In the draft Small Developments - Multifamily Rental RFA: Scoring of permits of new construction and rehab shouldn't be different. It creates a bias toward new construction.	For purposes of this RFA, PHCD does not agree that an undue bias exists for new construction projects over rehabilitation projects. PHCD has determined no changes are needed at this time.
	Stone Soup Development	4% deals by definition need more subsidy than 9% deals. So, we recommend that you have two Separate Categories and Amounts for 9% and 4% Tax Credit Deals. For 9% Tax Credits Points For 4% Tax Credits < $25,000 per unit 15 Less than $50,000 per unit $25,000-$40,000 / unit 10 $50,001-$60,000 / unit $40,001-$50,000 / unit 5 $60,001-$70,000 / unit > $50,001 / unit 0 > $70,001 / unit	PHCD has revised the scoring criteria to make the bonus points equal for 9% tax credit deals and 4% tax credit deals with firm aggregate commitments totaling more than $5 million.
	The Cornerstone Group	Over the past few years, bonus points have been added to the RFA: 1) Bonus points for a phased deal, where the first phase has been completed. 2) Bonus points for a 9% LIHTC transaction versus a bond-financed transaction. Generally, only projects built on county land are phased projects, which penalizes private developers' new construction projects. Recommendation: To place all developers on fair and equal footing, we recommend removing these bonus points. The second item rewards funding to 9% deals, which are the projects that least need funding, as their equity finances approximately 90% of tax credit basis. Conversely, the tax credit equity on a 4% tax-exempt bond financed transaction only funds 40% of tax credit basis. Recommendation: Give bonus points to bond-financed transactions, which have the larger gap.	PHCD has made the bonus points the same for 9% tax credit deals and 4% tax credit deals with firm aggregate commitments totaling more than $5 million.

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	The Cornerstone Group	This year, the draft 2018 RFA proposes two more bonus point items: 1) 5 points for high-rises that have a TDC less than the 2017 TDC. 2) 2 points for developers who use a third party GC.There should be no bonus points for either of the above. Bonus points for high-rises will materially adversely affect many districts where high-rises are not practical, permitted and/or prevalent. Recommendation: All units that stay within the 2017 RFA TDC should receive 5 bonus points. In terms of the GC bonus points, the two developers who were criminally convicted used a third party GC which funneled money back to those developer. That is the last thing that should be rewarded with any type of bonus points. Moreover, the FHFC now has a detailed GC cost certification process, as PHCD knows. That cost cert requires information on the costs of each and every subcontractor and whether a developer uses a third party GC or an affiliate GC. Further, a GC can no longer use a related subcontractor without Board approval as a result of another issue with a developer. The detailed cost certification was the result of the problems that occurred with the developers noted above. Recommendation: Eliminate the new GC bonus points proposed in the draft RFA.	PHCD compared FHFC's total development cost (TDC) allowed in its 2017 and 2018 RFA's, respectively; and found that the TDC for the high rise category rose significantly, as compared with a relatively stable or slight increase in the other development style categories. PHCD is not incentivizing building high rise developments where they would not otherwise be prudent; but rather is concerned with keeping the rents reasonable for affordable housing renters. PHCD reduced the bonus points for non-affiliated general contractors to 1 point.
	Landmark Construction	Page 53 of the draft version for **Rental Developments** provides 5 bonus points for efficient building costs of high rise developments when the total development cost is lower than $287,500 per unit. This is a worthy incentive; however, as presently drafted only high rise developments are rewarded for efficient building costs, granting high rise developments an advantage over other development types. A 5 point differential is very significant in this RFA. We respectfully request that PHCD please provide the same incentive for efficient building costs to (i) new construction Mid-Rise and Garden Style developments and (ii) rehab Garden style and rehab Non-Garden style developments. Without making this change, non-high rise developments will be at a disadvantage in competing for funding.	PHCD compared FHFC's total development cost (TDC) allowed in its 2017 and 2018 RFA's, respectively; and found that the TDC for the high rise category rose significantly, as compared with a relatively stable or slight increase in the other development style categories.
	Atlantic Pacific Communities	Please remove the bonus points associated with utilizing third-party general contractors. We do not see a public policy benefit to making vertically integrated development companies (i.e. those which have internal general contractors) less competitive than developers that lack this capacity. We self-perform construction on both our market rate and affordable developments, and our investors always appreciate the cost control and quality control benefits of our internal general contractor. In reaction to the recent problems in the industry, Florida Housing has rules that prohibit related-party subcontractors; the State's rules seem more germane to the County's policy goals than prohibitions on general contractors.	PHCD reduced the bonus points for non-affiliated general contractors to 1 point. PHCD will not disqualify developers who propose to use an affiliated general contractor.

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	Atlantic Pacific Communities	For the following reasons, please consider removing the new elderly unit mix requirement –"…the maximum percentage of 0- and 1-bedroom units is 85%, and the remaining 15% is limited to 2 bedroom units." Surtax Applicants that have been awarded funding by the Florida Housing Finance Corporation ("FHFC") have already established and submitted a unit mix to FHFC that meets the requirements of the state as well as IRC Section 42. There are currently two developments that will provide 347 new elderly units, and have been allocated over $12.5 million in SAIL funding, that do not include any 2-bedroom units in the unit mix. Creating Surtax funding requirements that are in conflict with Florida Housing requirements -- after funding has been allocated by the state -- runs contrary to the County's goal of leveraging outside dollars. Requiring a specific number of 0-, 1- or 2-bedroom apartments for elderly developments should be based on market need and feasibility. Costs relating to site acquisition, construction costs, zoning/density, building code, design and the market all contribute to the optimum unit mix of a development. Requiring larger units results in low-income renters paying additional rent for an extra bedroom due to the lack of smaller apartment sizes. The 2016 Rental Market Study prepared by the Shimberg Center for Housing Studies states: "The growth in older renter households reinforces the need for additional small rental units. More than half (53 percent) of Florida's renters age 55+ live alone, compared to just 29 percent of renters under age 65." See page 10: http://www.floridahousing.org/docs/default-source/press/newsroom/publications/rental-housing/rentalhousing2016/full-rms-final-rev09_16.pdf?sfvrsn=2. We hope you consider removing the unit mix requirement for FHFC funded elderly developments that just need this last piece of gap financing.	The elderly mix paragraph on page 18 was revised to read: For purposes of this RFA, developers proposing to develop elderly housing, the minimum percentage of 0- and 1-bedroom units is 85%, and the balance of the units cannot be larger than 2-bedroom units.
	Atlantic Pacific Communities	Please consider the following –There has been a strong focus at federal and state levels to place affordable housing in neighborhoods that offer better opportunities to its residents which Florida Housing defines as Areas of Opportunity. For the past two years, Florida Housing had a top priority to fund 2 developments (out of 3 total) that were located in an Area of Opportunity in the 9% GEO RFA. These neighborhoods have higher levels of income, educational attainment and employment. Please find a way to prioritize these development in your scoring process.	While PHCD recognizes that state and federal agencies allow funding for neighborhoods that have higher levels of income, educational attainment and employment, this is not the focus of the Documentary Stamp Surtax program.
	Ambar 3, LLC	On both the multi-family rental and workforce housing scoring sheets you have points for mixed income projects. However, you only breakdown the points based on percentage of units restricted and unrestricted. I was wondering how would a development that targets workforce with 55% of the units restricted as "Workforce Housing" and 45% of the units restricted as "Low," fall within your scoring criteria. To clarify, 100% of the units are restricted, but at different levels of income, therefore still considered mixed income.	For purposes of this RFA, PHCD is incentivizing developers to provide mixed income projects that include both workforce housing units and unrestricted units.
	J. L. Brown Development Corporation	The total points in this RFP is 86 points. Ten points are given to Large Tax Credit Developers (10 Points) Community Land Trust (2 Points) Proximity to rapid transit (5 points) Not for profit on development team (5 points) When you take the total points of 86 points and deduct the first three items of 17 points your score will be 69 points. In addition if you don't partner with a non-profit you have to deduct another 5 points and your score is 64 points. Clearly this application is for big tax credit developers. If you are a small developer and your project is not close to the rapid transit system then it is impossible to meet threshold. In the South Dade area most lots are not near the bus way due to the cost of land. The property near transit are typically multi-family properties. How many small developers in Homeownership met threshold in the past 3 years. As a developer I should not have to partner with a tax credit developer to participate or have a non-profit on my development team to participate. If I have met the ability to proceed I should be given an opportunity to participate. The way the points are structure you can have all 32 points under the ability to proceed (30 is realistic because you would not have a permit this early) and still not qualify to meet threshold. The RFP should have 70 to 72 points possible for all to reach to be considered.	Changes were made to the scoring for both Multifamily and Homeownership applications. See pages 52-69 in the Multifamily application and pages 45-47 in the Homeownership application.