

# **ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

CITY OF MIAMI  
FY2020-2024

Date Drafted:  
June 2020

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# INTRODUCTION

## Executive Summary

The Federal Fair Housing Act, Section 808(e)(5), requires the Secretary of the U.S. Department of Housing and Urban Development (HUD) to administer housing and urban programs in a manner affirmatively furthering fair housing (AFFH). Although the extent of the AFFH obligation is not defined statutorily, HUD establishes the following requirements<sup>1</sup>:

- Jurisdictions must conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Appropriate actions must be taken to overcome the effects of any impediments identified in the analysis; and
- Jurisdictions must maintain records reflecting the analysis and actions taken in this regard.

HUD interprets the objectives to “affirmatively further fair housing” to mean that the Jurisdiction will<sup>2</sup>:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing for all persons;
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status (pregnancy, family, or individual in the process of adopting or having legal custody of a child under the age of 18), disability (having a record of such impairment, persons diagnosed as being HIV-positive, and recovering substance abusers), and national origin;
- Promote housing that is structurally accessible to, and usable by all persons, particularly persons with disabilities; and
- Foster compliance with nondiscrimination provisions of the Fair Housing Act.

The Analysis of the Impediments to Fair Housing Choice (AI) is required of state and local governments that receive federal funds from HUD. This includes Community Block Grants (CDBG), HOME Investment Partnerships Program (HOME) funds, and Neighborhood Stabilization Program (NSP) funds. The AI is an extension of the Consolidated Plan 2019-2023 filed with U.S. HUD in 2019 and serves as an assessment of housing, housing related policies, and practices in use throughout the Jurisdiction that inadvertently or deliberately prevent its residents to choose where they live. The analysis includes a discussion of the barriers to housing choice within the City of Miami, a plan of action to overcome the identified impediments, and a strategy to maintain records and results of the actions taken. Although the AFFH obligation arises in connection with the receipt of federal funding, the obligation extends to all housing and housing related activities in the City of Miami whether publicly or privately funded. Factors that could restrict housing choice include, but are not limited to:

- Discrimination based on race, color, national origin, sex, religion, familial status and disability as defined by Title VIII of the Civil Rights Act of 1968;

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<sup>1</sup> US Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, *Fair Housing Guide*.

<sup>2</sup> *Ibid*

- Discrimination in the sale or rental of housing and other prohibited practices on the basis of race, color, religion, ancestry, national origin, sex, pregnancy, age, disability, marital status, familial status, gender identity, gender expression, sexual orientation, source of income or actual or perceived status as a victim of domestic violence, dating violence or stalking, as defined by the Miami-Dade County Code Chapter 11A;
- Lack of affordable housing;
- Severely cost burdened households;
- Lack of housing that is accessible to the disabled;
- Lack of reasonable and accessible transportation services.

The City of Miami Department of Housing and Community Development (HCD) last conducted an AI in 2014. In August 2019, it filed its most recent Consolidated Plan with U.S. HUD to span the years of 2019-2023 incorporating population data from the 2010 Census and most recent American Community Survey (ACS) estimates as the new decennial census is not expected to be released until 2021. In a complementary fashion, the City is now updating its Analysis of Impediments (AI) to Fair Housing to pick up where the previous AI left off.

The City was preparing this document as COVID-19 (novel Coronavirus) hit the country in March 2020, with Miami-Dade County being one of the hardest hit areas in the State of Florida. As of mid-March, emergency orders had been issued nationally, by Florida’s Governor and by the City of Miami Mayor including sheltering in place and the shutdown of businesses with the exception of those providing essential services (pharmacies, supermarkets, hotels, etc.). Because of this, and because Miami is a tourist destination with a high percentage of service-related jobs, much of the data noted in this document could dramatically change during the coming months due to both the personal and economic fallout caused by the pandemic, and at this time, its unknown duration.

**PLAN PERIOD**

This new AI will span from October 1, 2020 through September 30, 2025, and will further address where the City is presently in relation to fair housing matters, given the most recent demographic information available in both the 2010 U.S. Census and subsequent American Community Surveys that have been issued.

**MONITORING OF AI**

The City of Miami works throughout the year to implement its Analysis of Impediments to Fair Housing and is actively engaged in monitoring the actions outlined in this document to overcome the impediments to Fair Housing Choice within its purview.

It should be noted that as part of this monitoring effort, many of the actions include input provided by Housing Opportunities Project for Excellence, Inc. (HOPE, Inc.). This entity is the City’s local FHIP and conducts fair housing educational workshops in our City and County (Miami-Dade) aimed to educate community based organizations, disability advocacy agency staff and clientele, and local housing industry professionals. These seminars provide attendees with key information regarding fair housing laws and how to seek redress of grievances related to housing discrimination, issues regarding reasonable accommodations, dwelling unit modifications for the disabled, housing opportunities for people with AIDS, and compliance with fair housing laws that protect against housing discrimination due to race, color, religion, national origin, sex, disability, familial status, age, marital status, sexual orientation, or source of

income. In addition, testing is performed as well as monitoring of compliance with affordable housing regulations.

The HCD also provides individualized technical assistance in affirmative marketing and makes sure that federal, state and local fair housing policies are adhered to by its CDBG/HOME funded CDCs and CHDOs and its HOPWA and Section 8 sub-contractors (agencies, landlords and clients).

It should be noted that CDBG dollars are distributed amongst the City's five districts. Besides the 15% allocated to public service activities, the remaining CDBG dollars are utilized as needed and at the City Commission's discretion for miscellaneous economic development and housing activities, infrastructure needs (i.e. sidewalk and/or street improvements) and the improvement of public facilities (i.e. parks, fire stations) among other activities that serve lower-income census tracts. All the while, CDBG funding is meant to complement other ongoing activities in those areas, with preference always towards the Neighborhood Development Zones (NDZ) identified in the City of Miami's Consolidated Plan.

The HCD is responsible for distributing fair housing marketing materials (in English and Spanish) to the city's community Neighborhood Enhancement Team (NET) offices, which are located in all five city commission districts and accessible to city residents.

The City's fair housing strategy is also reviewed on a yearly basis by the HCD to ensure that it is meeting both its short- and long-term objectives; if it is determined that certain objectives are not being accomplished, then adjustments are made accordingly.

## **Methodology**

### **WHO CONDUCTED THE ANALYSIS**

The City of Miami Department of Housing and Community Development (HCD) is the lead agency coordinating all aspects of the AI.

### **PARTICIPANTS**

Key informant interviews were conducted with city and county officials as well as community stakeholders and private organizations for drafting the 5-Year Consolidated Plan and the AI. The agencies involved in the interview process or that provided valuable information are:

- The Florida Housing Finance Corporation
- Housing Opportunities for Excellence, Inc. (HOPE, Inc.)
- The Miami Realtors Association
- Florida International University Metropolitan Center
- Citrus Health Network, Inc.
- City of Miami Planning Department
- The Office of the Manager (City of Miami)
- Miami-Dade County's Public Housing and Community Development Department

The AI began with a review of available social, economic, and housing data gathered from a variety of sources including:

- U.S. Census Bureau - the 2010 Census and multiple years of the American Community Survey (ACS);
- U.S. Department of Housing & Urban Development (HUD) website and One CPD maps;
- the University of Florida’s Shimberg Center for Affordable Housing;
- The City of Miami Zoning Code (Miami 21);
- The 2019-2023 City of Miami 5-Year Consolidated Plan, Public Housing Authority Plan, Annual Plan and CAPER reports;
- the HIV/AIDS Housing Needs Assessment & Strategic Planning documents for the HOPWA Program in the Miami/Miami-Dade County MSA;
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database

Research requests were conducted with state and local public and private sector representatives from area banking, lending, insurance, real estate, property management, educational, health, community service, and neighborhood organizations. The impediments to fair housing choice and the conclusions and recommendations were identified through analyzing the data previously mentioned, as well as by obtaining information through key informant dialogues of participants listed above and by additional public input gathered at public meetings. A survey was developed in early 2020 with the intention to gather additional input from residents as part of this process, but unfortunately the City was affected by the COVID-19 pandemic.

The development of the Action Plan, and the Analysis of Impediments to Fair Housing Choice FY2020-2024 began in late 2019. With the gathered data, several tables and maps were also created to give context to the issues discussed herein. All references and tables utilized most recently available data from the U.S. Census and other sources and comparisons were made with dataset that could be compared based on U.S. Census guidelines.

**PUBLIC NOTICE AND REVIEW (NEED TO SCHEDULE)**

**STAGE I:** Due to COVID-19 pandemic, the public notice and review process for the Analysis of Impediments was amended following social distancing recommendations placed by the Centers for Disease Control and Prevention (CDC). As such a Virtual Public Hearing took place on July 2, 2020, which was broadcasted on Channel 77 with close captionings to comply with ADA requirements. Following HUD’s memorandum posted on April 1, 2020, titled “Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19”, the City posted its public notice on its website.

The following activities were carried out to ensure public participation at said hearings:

- Posting on City of Miami website, City’s public meetings webpage, and Housing and Community Development website;
- Advertised on the Miami Herald;
- Utilized the Neighborhood Enhancement Team (NET) Offices to advertise and market the public hearings to the local communities.

**STAGE 2:** On June 23, 2020, a public notice was posted on the City’s website, following HUD’s recommendation and COVID-19 public participation waivers, advising the public of the AI’s draft being available. It also noted the start date and the end date of the 30-day comment period and how to submit written comments. Residents had an opportunity to review and provide input for the draft AI. The same notice also advised the public of a second Public Hearing that took place on July 23, 2020 where residents had an additional opportunity to provide oral comments.

### **PUBLIC INPUT SURVEY**

Although a flyer and survey (in English, Spanish and Creole) was prepared to gather feedback on general fair housing concerns in the City, the latter coincided with the emergency orders issued by the federal, state and local governments related to COVID-19. As such, the response rate was lackluster and does not warrant being included here. During the life cycle of this document, and after the City is recovering from the economic and personal fallout tied to this health emergency, the same survey will be reissued and the results will provide an update to this document at that time.

### **REAL ESTATE PRACTICES**

The Miami Association of Realtors is the local organization of real estate brokers which encompasses both Miami-Dade and Broward County (including operating within the City of Miami) and includes more than 30,000 members (agents). It has an open membership policy and does not discriminate. Members are bound by the Code of Ethics and Standards of Practice of the National Association of Realtors (NAR). In order to become a Florida realtor, a 63-hour sales association pre-licensure course and subsequent exam are required. Following that, sales associates are required to complete a 45-hour post-license course within the licensee’s first renewal cycle. After that, in order for realtors to maintain their licensing in the state, they must annually complete a 14-hour continuing education courses (every other year) which include fair housing education. Multiple options are provided to realtors as part of these CE courses related to affordable housing programs and fair housing requirements.

NAR’s Code of Ethics obligates its members to maintain professional standards including efforts to affirmatively further fair housing. Specifically, Article 10 of that Code elaborates on a realtors’ duties to the public which include:

- Realtors® shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. Realtors® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. (Amended 1/14)
- Realtors®, in their real estate employment practices, shall not discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. (Amended 1/14)

The NAR enforces its Code of Ethics through a disciplinary commission consisting of NAR members. If a person believes that a realtor has violated one or more Articles of the Code of Ethics, they can file an ethics complaint alleging a violation(s) through the local association of realtors where the realtor holds membership.

During the development of the AI, several communications were shared with administrators of the Miami Association of Realtors who reported that the organization is very conscious of Fair Housing Law and prohibited practices, such as steering. Members refer clients with sensitive questions on neighborhood features to sources of impartial data.

HCD communicates with this organization several times a year and shares information, as appropriate. Most recently (in 2019), the realtors have held at least one training addressing the local “source of income” protection. As one of the newest fair housing protections extended in Miami-Dade County, awareness of it – especially amongst landlords – is lacking. To that end, Miami Realtors has been proactive in educating its members.

## **LAWS – STATE AND LOCAL**

On a State level, *Chapter 760 of Florida Statutes* delineates that “it is against the law to discriminate in the sale, rental, financing, appraisal, or insuring of housing, in the provision of real estate brokerage service, or in the advertising of a dwelling on the basis of race, color, religion, sex, national origin, handicap or familial status (families with children under 18, pregnant women and people securing custody of children under 18). Steering and blockbusting are also illegal. In addition, it is against the law to fail to design and construct new multi-family housing in an accessible manner, or to refuse certain modifications or accommodations to persons with a mental or physical disability.”

Aside from this, the *Florida Fair Housing Act*, which parallels the Federal Fair Housing Act, declares it illegal to discriminate in the sale, rental, advertising, financing, or providing of brokerage services for housing. On a state level, discrimination complaints (including those related to fair housing) are filed with the Florida Commission on Human Relations, who are tasked with the investigation and resolution of discrimination complaints in the areas of:

- Mediation
- Employment
- Housing
- Public Accommodations
- Florida's Whistle-blower's Act
- Indigent Status

The City of Miami does not have a fair housing ordinance in its Municipal Code, but looks and adheres to Miami-Dade County’s Code to define unlawful housing practices. Miami-Dade County’s civil and human rights ordinance, codified as Chapter 11A, (Article II, Sec. 11A-12) of the Miami-Dade County Code (as amended by the Miami-Dade County Commission in December 2014), specifies the classes protected from housing discrimination in Miami-Dade County (and as such, in the City of Miami). These are as follows: **race, color, religion, ancestry, national origin, sex, pregnancy, age, disability, marital status, familial status, gender identity, gender expression, sexual orientation, or source of income**. As an entitlement, the HCD also adheres to HUD’s **Equal Access Rule** (NOTICE PIH 2014-20 HA), issued on August 20, 2014, which requires HUD’s assisted and insured housing programs open to all eligible individuals regardless of sexual orientation, gender identity or marital status, as well as the VAWA Reauthorization Act of 2013, Final Rule, effective in Dec. 2016 ( 81 Fed. Reg. 80724) in HUD Housing Programs

The County unit responsible for adherence to the civil and human rights ordinance is the *Office of Human Rights and Fair Employment Practices* and its related *Miami-Dade County Commission on Human Rights*,

a quasi-judicial advisory board of 18 volunteers, including attorneys. Residents of the County can file a complaint directly with this entity which has the legal rights to investigate allegations of discrimination under federal, state, and local laws. The Commission also has under its purview fairness and equal opportunity in employment, public accommodations, credit and financing practices, family leave and domestic violence leave.

# JURISDICTIONAL BACKGROUND DATA

## CONTEXT FOR A FAIR HOUSING DISCUSSION

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). This section of the report provides a profile of the protected classes in the City of Miami and other related general information.

## Social Trends

One aspect of assessing fair housing involves determining the representation of protected classes in the population and if any socio-economic disparities exist. Miami’s residents are of an unusually diverse ethnic and racial background, with a large share of foreign born residents, low median incomes, and an increasingly aging population of persons 65 and over. In the following sections, these and other social trends in the City of Miami will be reviewed, with data pulled directly from the most recent decennial census, the 2010 Census, as well as latest updates to the ACS.

## POPULATION GROWTH

The City of Miami has been experiencing significant population growth since the early 2000s. The City was accountable for 15 percent of the County’s population growth from 2000 to 2010 and from 2010 to 2017, the City was responsible for 28 percent of the County’s population growth. During this period, data indicates that the City’s population increased by 71,896 residents amounting to an 18.4 percent increase that far surpassed Miami-Dade County’s increase of 10.2 percent during the same timeframe. According to the 2017 ACS 1-Year Estimates, the City of Miami population in 2017 was of 463,354 residents.

Table PG-1: Population Growth Change: City of Miami/Miami-Dade County 1970-2017

Decade	City of Miami		Miami-Dade County		Percent of County's Growth that Occurred within the City
	% Change	# Change	% Change	# Change	
1970-1980	3.5%	11,822	28.2%	357,717	3%
1980-1990	3.5%	11,967	19.2%	311,685	4%
1990-2000	1.1%	3,822	16.3%	316,168	1%
2000-2010	10.2%	36,987	10.8%	243,073	15%
2010-2017	18.4%	71,896	10.2%	255,361	28%
1970-2017		136,494		1,484,004	9%

Source: U.S. Census Bureau data Tabulation, 1970-2017

Table PG-2: Demographics, City of Miami

City of Demographics	2000	2010	2017	% Change 2010-2017
Population	362,470	391,458	463,354	18.4%
Households	134,344	149,077	170,005	14.0%
Median Income	\$23,483	\$29,621	\$40,327	36.1%

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates (B01003, S1101, B19013)

It is difficult to anticipate if this population spike will continue and also to speculate if the demographic trends that emerged within the past decade – which are detailed further into this document – will continue or change. However, it bears mention that in terms of land area, Miami is one of the smallest major cities in the U.S., encompassing a total area of 55.27 square miles, with some 36 miles of land and the remainder being water. This means its reported population on just 36 miles makes it one of the most densely populated cities in the U.S., along with New York, San Francisco, Boston, Chicago and Philadelphia. It is important to address this congestion, because the HCD believes it relates directly to the recent massive wave of vertical development that has taken place in the City.

Table PG-3 below offers a comparison of the City’s population in 2000, 2010, and 2017 amongst racial and ethnic populations. The data makes several things clear: (a) the City mainly lost Black/African American, Non-Hispanic population; (b) the City lost persons of two or more races (both Hispanic and non-Hispanic); (c) there was a concise increase in the White Hispanic population (+94,632).

Table PG-3: Race and Ethnicity, 2000, 2010 Decennial vs 2017 ACS

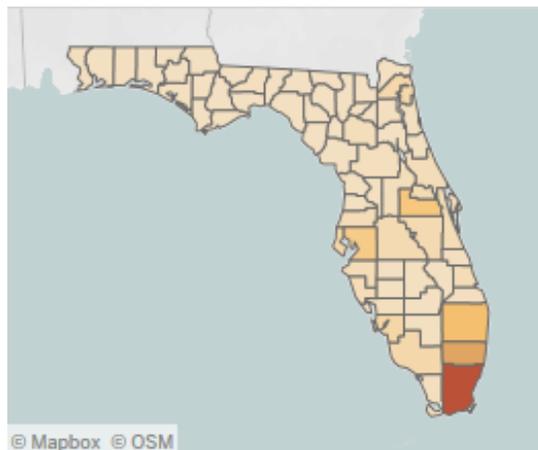
Race/Ethnicity	2000		2010		City of Miami 2017		Change 2000-2017	
	#	%	#	%	#	%	#	%
<b>Not Hispanic or Latino</b>	<b>124,119</b>	<b>34.2</b>	<b>120,001</b>	<b>30.0</b>	<b>131,140</b>	<b>28.3</b>	<b>+7,021</b>	<b>-5.9</b>
White	42,897	11.8	47,622	11.9	50,704	10.9	+7,807	-0.9
Black/African American	72,190	19.9	64,993	16.3	71,224	15.4	-966	-3.6
Other Race	2,930	0.8	4,744	1.2	6,548	1.4	+3,618	+0.6
Two or More Races	6,102	1.7	2,642	0.7	2,664	0.6	-3,438	-1.1
<b>Hispanic or Latino</b>	<b>238,351</b>	<b>65.8</b>	<b>279,456</b>	<b>70.0</b>	<b>332,214</b>	<b>71.8</b>	<b>+93,863</b>	<b>+5.9</b>
White	198,573	54.8	242,298	60.7	293,205	67.7	+94,632	+12.9
Black/African American	8,668	2.4	11,887	3.0	12,187	2.6	+3,519	+0.2
Other Race	20,030	5.5	17,173	4.3	19,832	4.3	-198	-1.2
Two or More Races	11,080	3.1	8,098	2.0	6,990	1.5	-4,090	-1.6
<b>Total</b>	<b>362,470</b>	<b>100.0</b>	<b>399,457</b>	<b>100.0</b>	<b>463,354</b>	<b>100.0</b>	<b>+100,884</b>	<b>(x)</b>
White	241,470	66.6	289,920	72.6	343,909	74.2	+102,439	+7.6
Black/African American	80,858	22.3	76,880	19.3	83,411	18.0	+2,553	-4.3
Other Race	22,960	6.3	21,917	5.5	26,380	5.7	+3,420	-0.6
Two or More Races	17,182	4.7	10,740	2.7	9,654	2.1	-7,528	-2.6

Source: U.S. Census Bureau, 2000, 2010 Decennial, 2017 ACS 1-Year estimates (B3002)

## **RACE & ETHNIC COMPOSITION**

The City of Miami’s designation since the 1970s as a “majority minority” municipality adds a layer of complexity when analyzing data. Miami has a unique context for this discussion because it is among the nation’s largest cities with a large share of non-white population. The growth in the minority population in the City of Miami is largely due to the increase in Hispanic and Latino populations. As such, the “majority minority” designation does not mean that Miami has become more racially diverse; rather it has become increasingly a city of immigrants from the Caribbean and Latin America. In 2010, the Census found that the growth of the Hispanic population continues and now comprises 70% of the city’s population. This snapshot is not unique to our area. In fact, according to [www.migrationpolicy.org](http://www.migrationpolicy.org), the U.S. Census Bureau’s pooled 2013-2017 ACS indicates that Miami-Dade County’s immigrant population is the second highest of any County in the nation with an approximate number of 1,430,900 persons. As noted by the non-profit, the term "immigrants" (or "foreign born") refers to people residing in the United States who were not U.S. citizens at birth. This population includes naturalized citizens, lawful permanent residents (LPRs), certain legal nonimmigrants (e.g., persons on student or work visas), those admitted under refugee or asylum status, and persons illegally residing in the United States. The State of Florida ranks fourth (of all U.S. states) after California, Texas and New York in immigrant population with approximately 4.1 million immigrants. The latter means that many of our residents come from countries where fair housing policies differ or don’t exist at all. This lack of knowledge or awareness of fair housing rights creates an automatic impediment that other communities do not have to address.

Miami-Dade County, Florida	1,430,900
Broward County, Florida	625,400
Palm Beach County, Florida	350,600
Orange County, Florida	266,800
Hillsborough County, Florida	222,400
Lee County, Florida	113,000
Pinellas County, Florida	111,900
Duval County, Florida	94,200
Collier County, Florida	86,600
Polk County, Florida	65,000
Osceola County, Florida	64,800
Seminole County, Florida	55,800



According to the most recent Census estimates (Tables PG-3 and RE-1), the Hispanic population’s growth over the past seven years outpaced the growth rate of the city as a whole; the city’s population grew by 13.8 percent, while the Hispanic population grew by 15.9 percent. The White Non-Hispanics population experienced a slight decline in population percentages even as it is estimated it added over 3,000 people making up 10.9 percent of the population. Likewise, the Black/African American population had a small increase in individuals residing in the City yet it continue to experience losses in population percentages. In the last seven years, Census figures indicate that the Black population in the City of Miami from, 2010 to 2017 increased by 6,531 people to now make up 18 percent of the population a decrease 1.2 percentage points. In addition to the changes described above, there is one other aspect to the racial and ethnic composition of the city that bears noting. Due to changes in the Census survey since 2000, race and ethnicity are two different categories. Since the Hispanic population in the City of Miami is

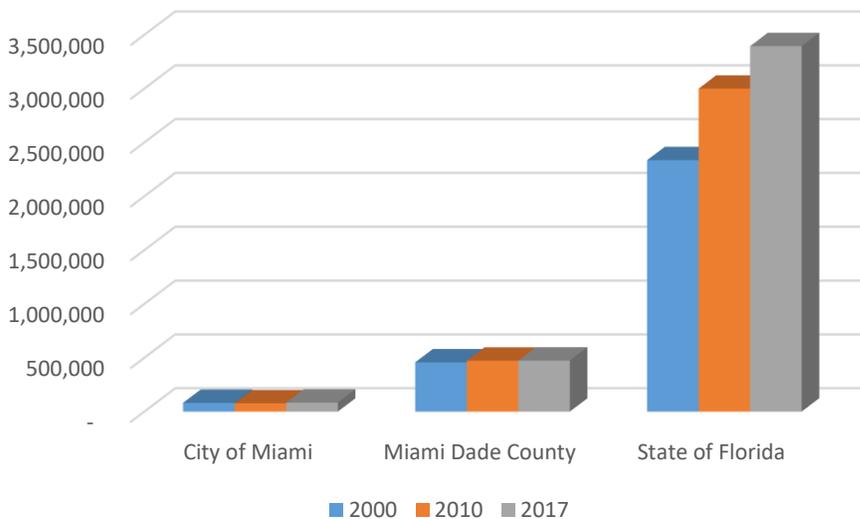
significantly large and can additionally select a race in the census survey, the traditional racial categories become skewed. For example, the 2017 ACS estimates that there is a White population of 343,909 (74.2 percent); however, 85.3 percent of that White population is Hispanic. To a much smaller degree, there is also a portion of the Black population that is Hispanic—approximately 14.6 percent.

Table RE-1: Growth Rate by Race and Ethnicity, 2010 to 2017

Race/Ethnicity	# Change within Race and Ethnicity	% Change within Race and Ethnicity
<b>Total population</b>	<b>63,897</b>	<b>13.8</b>
White	53,989	15.7
Black or African American	6,561	7.8
Other race	4,463	16.9
Two or more races	-1,086	-11.2
<b>Hispanic or Latino</b>	<b>52,758</b>	<b>15.9</b>
White	50,907	17.4
Black or African American	300	2.5
Other race	2,659	13.4
Two or more races	-1,108	-15.9
<b>Not Hispanic or Latino</b>	<b>11,139</b>	<b>8.5</b>
White	3,082	6.1
Black or African American	6,231	8.7
Other race	1,804	27.6
Two or more races	22	0.8

Source: U.S. Census Bureau, 2010 Decennial, 2017 ACS 1-Year estimates (B3002)

Graph RE-1: Hispanic or Latino Population by Region 2000, 2010, 2017



Source: U.S. Census Bureau, 2000, 2010 Decennial, 2017 ACS 1-Year estimates (QT-P10, DP05)

The bar graphs above takes a closer look at the Hispanic population and its growth rates from 2000 to 2017, compared to the Miami-Dade County and the State of Florida. As noted, the City and County’s growth rates in the Hispanic population from 2000 to 2017 are both outpaced by Florida’s growth rate in this ethnic category.

## **POPULATION AGE**

The City is also experiencing a significant shift in the distribution of its population by age. Table PA-1 shows that, as a percentage of the population, school-aged children and younger adults are trending downward while populations composed of individuals aged 24 and older (with the exception of the 35-44 cohort which experienced a slight decrease) and considered to be of working-age are trending upwards, especially the 45-54 cohort which experienced the highest increase of any group at 0.9 percent or 12,768 people.

Table PA-1: Percent Change in Age Distribution: City of Miami 2010-2017

AGE (Years)	Trend % of Population	2017 City of Miami		2010 City of Miami	
		#	%	#	%
<b>Total Population</b>	●	463,354	100%	399,457	100%
<b>Under 5 years</b>	↓-0.3%	26,488	5.7%	23,882	6.0%
<b>5-9 years</b>	↓-0.3%	21,025	4.5%	19,072	4.8%
<b>10-14 years</b>	●	21,543	4.6%	18,364	4.6%
<b>15-19 years</b>	↓-0.4%	22,630	4.9%	21,080	5.3%
<b>20-24 years</b>	↓-1.1%	28,350	6.1%	28,628	7.2%
<b>25-34 years</b>	↑+0.2%	77,577	16.7%	65,824	16.5%
<b>35-44 years</b>	↓-0.01%	68,373	14.8%	59,469	14.9%
<b>45-54 years</b>	↑+0.9%	<b>68,835</b>	<b>14.9%</b>	<b>56,067</b>	<b>14.0%</b>
<b>55-59 years</b>	↑+0.1%	27,521	5.9%	23,227	5.8%
<b>60-64 years</b>	↑+0.6%	26,059	5.6%	19,857	5.0%
<b>64-74 years</b>	↑+0.4%	38,913	8.4%	32,075	8.0%
<b>75-84 years</b>	↓-0.2%	25,649	5.5%	22,747	5.7%
<b>85-Over years</b>	↓-0.1%	10,391	2.2%	9,165	2.3%

Source: U.S. Census Bureau, 2010, 2017 American Community Survey 1-Year Estimates (DP05)

The table above shows that the group that experienced the highest percentage growth is the 45-54 years cohort. Other groups with net positive percentage changes are the 25-34 and 55-59 cohorts, also working-age cohorts. These age groups can provide an economic boost to the City and an opportunity to further expand resources and investment.

## **DISSIMILARITY**

Dissimilarity (and/or the index of dissimilarity (aka segregation)) is a demographic measure of the evenness with which two groups are distributed across particular geographic areas that make up a larger

area. The index score can also be interpreted as the percentage of one of the two groups included in the calculation that would have to *move* to different geographic areas in order to produce a distribution that matches that of the larger area. The index of dissimilarity can also be used as a measure of inequality. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered moderate levels of segregation.

For this particular topic, the City turned to the St. Louis fed for the most updated data for our MSA as information is not boiled down to individual jurisdictions. To begin, the black-white dissimilarity index for our region (Miami-Fort Lauderdale-Pompano Beach MSA) sits at .639 (64%) with a range from 0 (fully integrated) to 1 (fully segregated).<sup>3</sup> When we pull dissimilarity between whites and non-whites in Miami-Dade County in 2018 was 47.9, which is considered fair.<sup>4</sup> When looking at dissimilarity between Hispanics and non-Hispanics, the index is at its lowest 52.1%.

## **EDUCATION**

According to 2013-2017 ACS estimates, only 16.3 percent of the City of Miami’s population 25 years of age and over have a bachelor’s degree or higher. The City’s population 25+ population with less than a high school diploma is 24.4 percent. Significantly, 19.0 of the City’s population 19-24 years have less than a high school education.

Table ED-1: Educational Attainment by Age Group

<i>Age Group</i>	<i>Total</i>	<i>Percent</i>
	36,000	(x)
<i>Population 18 to 24 Years</i>	<i>Less than high school graduate</i>	6,853 19.0
	<i>High school graduate (includes equivalency)</i>	11,315 31.4
	<i>Some college or associate’s degree</i>	13,697 38.0
	<i>Bachelor’s degree or higher</i>	4,135 11.5
	327,920	(x)
<i>Population 15 years and over</i>	<i>Less than 9<sup>th</sup> grade</i>	47,180 14.4
	<i>9<sup>th</sup> to 12<sup>th</sup> grade, no diploma</i>	32,943 10.0
	<i>High school graduate (includes equivalency)</i>	97,595 29.8
	<i>Some college, no degree</i>	40,839 12.5
	<i>Associate’s degree</i>	22,986 7.0
	<i>Bachelor’s degree</i>	53,431 16.3
	<i>Graduate or professional degree</i>	32,946 10.0
<i>Total Population</i>	<i>Percent High school graduate or higher</i>	(x) 75.6
	<i>Percent Bachelor’s degree or higher</i>	(x) 26.3

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

<sup>3</sup> <https://www.governing.com/gov-data/residential-racial-segregation-metro-areas.html>

<sup>4</sup> <https://fred.stlouisfed.org/series/RACEDISPARITY012086>

Table ED-2: Educational Attainment by Race and Area

	Miami %	Miami-Dade %	State of Florida %
<b>Less than high school graduate</b>	<b>19.0</b>	<b>14.6</b>	<b>15.2</b>
<b>High school degree or Higher</b>	<b>75.6</b>	<b>81.0</b>	<b>88.4</b>
--White	96.1	94.4	92.9
--Black/African American	70.3	77.9	83.7
--American Indian/Alaskan Native	52.3	73.7	80.1
--Asian	82.5	84.8	86.6
--Hispanic or Latino	73.2	78.8	80.1
<b>Associate’s degree or Some College</b>	<b>22.5</b>	<b>28.5</b>	<b>27.7</b>
<b>Bachelor’s degree or Higher</b>	<b>26.3</b>	<b>27.8</b>	<b>29.7</b>
--White	63.6	49.9	33.3
--Black/African American	12.1	16.2	18.8
--American Indian/Alaskan Native	3.5	15.9	20.8
--Asian	56.3	50.7	50.8
--Hispanic or Latino	22.8	25.3	24.1
<b>Graduate or professional degree</b>	<b>10.0</b>	<b>10.0</b>	<b>10.8</b>

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates (S1501)

Education is an area of great concern in the State of Florida and in Miami as it allows for successful job placement, development, and resident retention. In the City of Miami, close to 19 percent of the population between 18 and 24 had less than a high school degree, much higher than the averages of both the County and State. The data also indicates that only 26.3% of the population had a Bachelor’s degree or higher which is lower than the percentages from the State and the County.

### **LINGUISTIC ISOLATION**

To understand linguistic isolation in Miami, we must first understand that the level of diversity in Miami is significantly higher than that seen across most other parts of the country. The ACS 2013-2017 5-Year estimates (S0520) indicate that an astounding 55.4 percent (256,914) of Miami’s population is foreign born and 93.7 percent speak a language other than English at home (ages 5 and up).

Linguistic isolation is another thing altogether. According to the Census, “a linguistically isolated household is one in which no person age 14 years or over speaks English at least “very well.” It makes sense that in an area where many persons are foreign born, levels of linguistic isolation will be higher. In Miami, 64.8 percent of the foreign born population speaks English less than “very well.”

While the inability to speak English fluently is not itself a protected class, it is related to *national origin* and may affect an individual’s ability to comprehend basic information pertaining to housing and housing

opportunity if information is provided only in English. As indicated in the table below, the ACS 2013-2017 5-Year estimates indicate that 26.9% of Miami’s Spanish speaking households are linguistically isolated.

Table LI-1: Household Language by Linguistic Isolation

<i>Household Language</i>	<i>Miami Households</i>	<i>Percent</i>
<b>Total Households</b>	<b>170,005</b>	<b>100.0</b>
<b>English only</b>	<b>41,695</b>	<b>24.5</b>
<b>Spanish</b>	<b>112,668</b>	<b>66.3</b>
--Linguistically Isolated	45,699	26.9
--Not linguistically isolated	66,969	39.4
<b>Other Indo-European languages</b>	<b>12,918</b>	<b>7.7</b>
--Linguistically Isolated	3,007	1.9
--Not linguistically isolated	9,911	5.8
<b>Asian &amp; Pacific Island languages</b>	<b>1,870</b>	<b>1.1</b>
--Linguistically Isolated	126	0.1
--Not linguistically isolated	1,744	1.0
<b>Other languages</b>	<b>854</b>	<b>0.5</b>
--Linguistically Isolated	91	0.1
--Not linguistically isolated	763	0.4

Source: US Census Bureau, American Community Survey 2013-2017, 5-Year estimates (B16002)

## **LIMITED ENGLISH PROFICIENCY (LEP) PERSONS**

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be Limited English Proficient, or “LEP.” To be clear, the Census Bureau **does not** define the limited English proficiency or non-limited English proficient populations. The Census Bureau reports data based on the four categories of English speaking ability - very well, well, not well and not at all.

Because Miami is comprised of many immigrants and we are a “minority majority” City, the HCD followed HUD’s recommendation and conducted a preliminary LEP assessment in accordance to the final guidance issued to *Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, Fed. Register, Vol. 72, No. 13, Jan. 22, 2007*. That assessment utilizes the four factor method: (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP persons come in contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people’s lives; (4) and the resources available to the grantee/recipient and costs. Based on our City’s population, the HCD concluded that the different, existent (already in place) language assistance measures are sufficient for the different types of programs or activities in which the HCD engages.

The HCD has staff members who are fluent in Spanish and Creole and makes every attempt to translate the most vital programmatic materials for the public to both Spanish and Creole, as necessary and reasonably requested to allow non-English speaking residents the opportunity to participate in the different plans detailed in the Citizen Participation Plan (CPP). In public meetings, HCD staff makes sure to have a Spanish speaker and Creole speaker on hand in the event on-the-spot translations are needed.

In late 2019, the City of Miami launched a new web platform that allows constituents to translate all web-based information on the entire miamigov.com website to Spanish or Creole, with a quick drop down toggle option.

At the recommendation of US HUD's Miami office, the City will work in the Summer of 2020 to put together an official Language Assistance Plan that will delineate how the City will provide language assistance services, when needed, to ensure that all constituents have access to its programs and activities. The City's Equal Opportunity Office is taking the lead on this effort and will gather input from relevant Departments, including Housing & Community Development.

### **RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)**

The bulk of Miami's census tracts qualify as majority-minority, where a minority will comprise a large percentage of the tract, we must focus on poverty levels to better understand where low-income families are concentrated. To that end, we take a current look at the City's R/ECAPs -- Racially/Ethnicallly-Concentrated Areas of Poverty -- as defined by US HUD. In order to qualify as a R/ECAP:

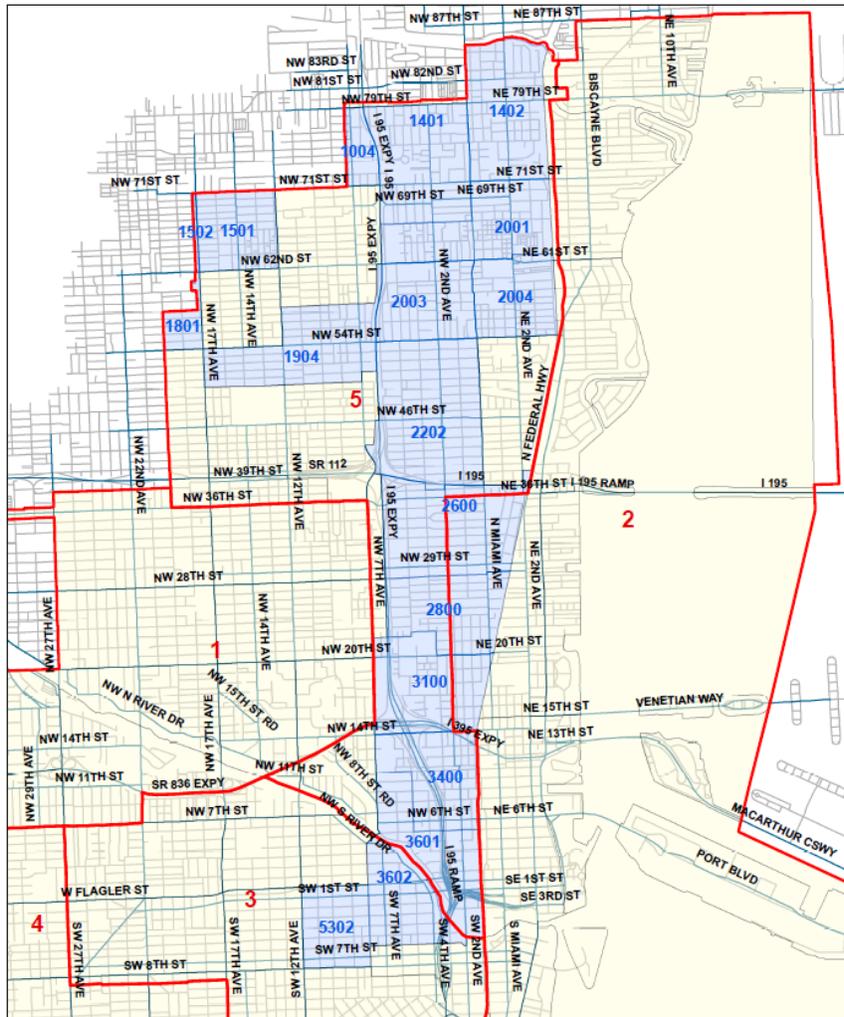
- Census tracts must have a non-white population of 50 percent or more AND 40 percent or more of individuals living at or below the poverty line.
- Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

As of 2018, eighteen tracts qualify as R/ECAPs within the City. These are identified by number in Map MA-50.1. It bears mention that nine of those tracts (exactly half) were R/ECAPs based on data from the 2010 U.S. Census. These were: 14.02, 15.01, 15.02, 18.01, 20.03, 26.00, 34.00, 36.01, and 53.02. This means that in close to a decade, the amount of R/ECAPs has doubled and that poverty continues to further concentrate itself in particular areas of the City, even as unemployment has dropped, income levels have risen, and housing construction has climbed.

When looking to the map below, one can see that practically all of the R/ECAPs are located in District 5 of the City, spanning from the northern boundary of the City towards the South.

The populations in these neighborhoods are mainly comprised of extremely low- to moderate-income households. The housing is mainly renter-occupied and the housing structures typically 50+ years in age. Little new affordable housing has been developed in these neighborhoods in recent years. However, newer market-rate housing is being developed or proposed in these neighborhoods and gentrification has become more of a concern.

Map MA-50.1 – Racially and Ethnically Concentrated Areas of Poverty, 2018

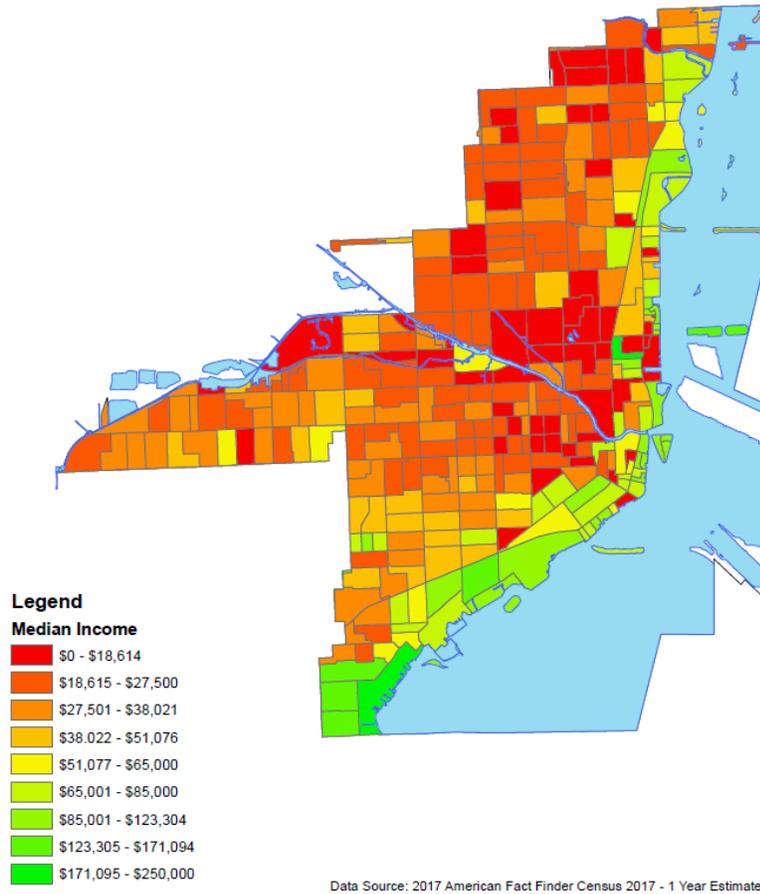


Source: <https://www.hudexchange.info/resource/4868/affh-raw-data> February 2018

## HOUSEHOLD INCOME AND POVERTY RATES

Despite unprecedented job growth and low unemployment, the economic well-being of most Miami households has not significantly improved. As noted in Map HIP-1, the highest income households in the City – with few exceptions - are found along the coastline (shaded in green and yellow), which also coincides with those areas where land values tend to be at their highest. Map HIP-1 also displays a significant amount of scattered red tracts, which represents where lowest median income households (\$0-\$18,614) comprise the majority. The bulk of these red tracts are concentrated in the middle of the City, around the Miami River, which cuts directly through the City center.

Map HIP-1 – Median Income



As noted in Table HIP-1 below, the ACS 2017 1-Yr Estimates notes that close to 57.8 percent of the City’s household incomes are below \$49,999. Although the City’s median household income has grown, the median household expenditure in the City averages \$48,880 a year (as per the Miami-Dade Beacon Council). This mismatch between wages and living costs could stifle a household’s ability to climb the income ladder. Most City workers are employed in low-wage service sector occupations, including retail trade, leisure and hospitality, and educational and health services. The average wage of all City workers is \$27,250 and an estimated 40 percent of all households in the City earn 80 percent or less than the median income.

Table HIP-1: Household Income: City of Miami, 2015 vs 2017

Income	Trend	2017 ACS	2015 ACS
Less than \$10,000	↓	12.7%	17.2%
\$10,000 to \$14,999	↓	7.3%	9.0%
\$15,000 to \$24,999	↓	14.5%	16.8%
\$25,000 to \$34,999	↓	10.9%	12.3%
\$35,000 to \$49,999	↑	12.4%	11.5%

Income	Trend	2017 ACS	2015 ACS
\$50,000 to \$74,999	↑	15.0%	13.4%
\$75,000 to \$99,999	↑	8.9%	7.5%
\$100,000 to \$149,999	↑	8.9%	6.2%
\$150,000 to \$199,999	↑	3.9%	2.4%
\$200,000 or more	↑	5.6%	3.6%
<b>Median Household Income</b>		\$40,327	\$29,989

Source: U.S. Census Bureau, 2017 American Community Survey, 1-Year estimates (S1901); 2015 ACS 1-Year Estimates (S1901)

Although poverty is not a protected class, it does fundamentally affect a person’s/family’s ability to rent or purchase a home and to become economically mobile (improve economic status). To that end, an analysis of poverty levels in the City of Miami bears mention. The U.S. Census Bureau, 2013-2017 5-Year ACS estimates that 25.8 percent of Miami’s population is below the poverty level, which is one-fourth of its residents. The national average is 14.6 percent, while in Florida 15.5 percent of the total population is below the poverty level. The City of Miami has the 5<sup>th</sup> highest poverty rate amongst benchmark cities in the US.

As noted in Table HIP-2 below, the highest percentage of the population in the City determined to be below the poverty level is Black/African American at 38.3 percent. Hispanics (of any race) comprise approximately 25 percent of those persons in poverty.

Table HIP-2: Poverty Status in the Past 12 Months (Individuals)

	Percent below Poverty Level
<b>Total Population for who poverty status is determined</b>	<b>22.8</b>
<i>Race and Hispanic or Latino Origin</i>	
<i>One race</i>	
White	23.0
Black or African American	38.3
American Indian and Alaska Native	13.8
Asian	19.8
Native Hawaiian and Other Pacific Islander	22.1
Some other race	29.7
Two or more races	18.4
Hispanic or Latino (of any race)	25.0
White alone, not Hispanic or Latino	12.4

Source: US Census Bureau, American Community Survey 2013-2017, 5-Year estimates (S1701)

Table HIP-3 provides data related to the family composition of those living below poverty according to the 2009-2013 ACS 5-Year estimates. As expected and as is most prevalent, poverty is most seen amongst female-headed households with related children under 18 where approximately half of them live in poverty.

Table HIP-3: Poverty Status in the Past 12 Months (All Families)

	<i>Percent below Poverty Level</i>
<i>All Families</i>	21.7
<i>With related children under 18 years</i>	31.8
<i>Married-couple families</i>	14.8
<i>With related children under 18 years</i>	19.3
<i>Families with female householder, no husband present</i>	34.9
<i>With related children under 18 years</i>	<b>48.4</b>

Source: US Census Bureau, American Community Survey 2013-2017, 5-Year estimates (S1702)

## **INCOME INEQUALITY**

According to Census data released in the Fall of 2019 (with the latest data for 2018), income inequality in the US, as a whole, has hit its highest level since the U.S. Census Bureau started tracking it more than 50 years ago, even with poverty and unemployment levels at historic lows (pre-COVID-19 data). The rise in economic inequality is tied to several factors. These include, in no particular order, technological change, globalization, the decline of unions and the eroding value of the minimum wage.

According to a Bloomberg analysis of large American cities with a population of at least a quarter-million, Atlanta ranked first followed by Miami in second position in the income inequality category. Bloomberg measured the distribution of household income in 87 cities using 2018 data from the U.S. Census Bureau’s American Community Survey.<sup>5</sup> The standard measure of income inequality – the Gini coefficient – has a scale that ranges from zero, which reflects absolute equality, to one -- complete inequality. The Gini index closed at .485 in 2018 for the US States. For comparison purposes, the same index was at .397 in 1967.

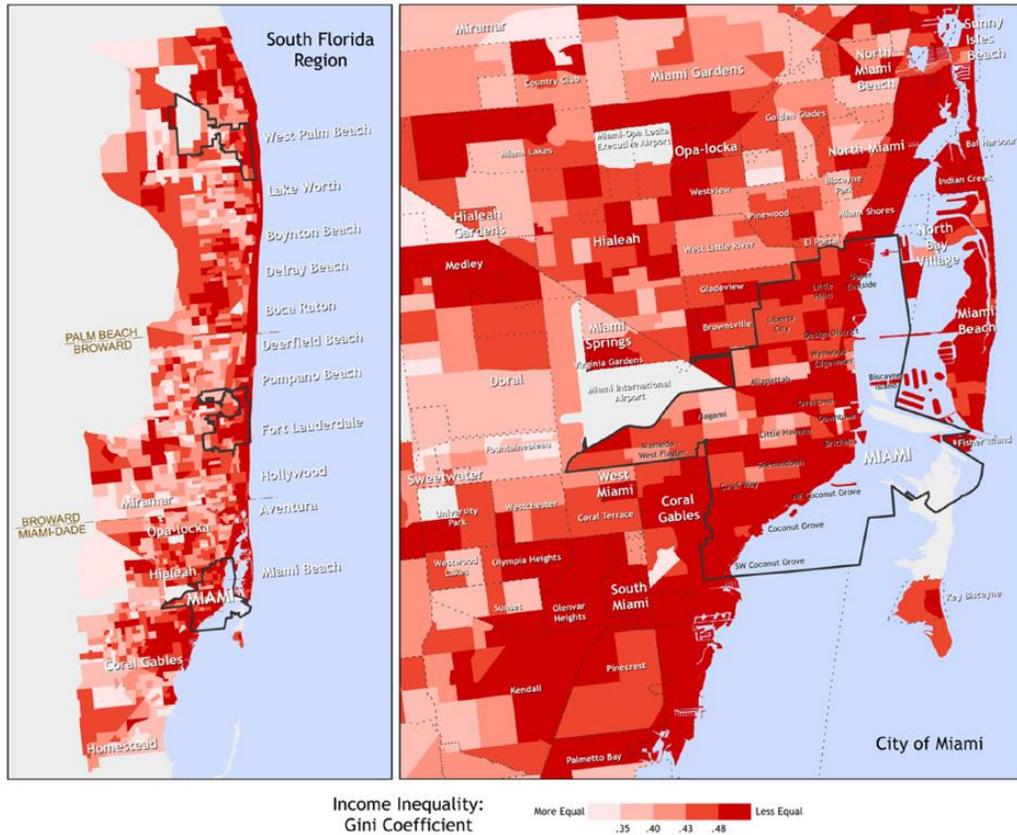
According to the Miami Urban Future Initiative (MUFI) report published in April 2019, Miami's level of income inequality based on the Gini coefficient, is 0.508. This level of inequality is similar to that of Colombia or Panama. Miami and New York are the only two U.S. metros with a Gini coefficient greater than 0.500.<sup>6</sup> See the figure below from the same report, with the black outline on the right image containing the City of Miami. All along the shoreline, which encompass Miami’s priciest neighborhoods, the deep red dominates, indicating where inequality issues are at their worst.

With approximately 12 percent of Miami working service jobs<sup>7</sup> that depend on tourism, this stark inequality puts many Miamians at a disadvantage should a catastrophe, health issue or unexpected problem arise.

<sup>5</sup> <https://www.bloomberg.com/news/articles/2019-11-21/in-america-s-most-unequal-city-top-households-rake-in-663-000>

<sup>6</sup> TOWARD A MORE INCLUSIVE REGION Inequality and Poverty in Greater Miami, Richard Florida and Steven Pedigo, <https://carta.fiu.edu/mufi/>

<sup>7</sup> US Bureau of Labor Statistics: [https://www.bls.gov/regions/southeast/news-release/areaemployment\\_miami.htm](https://www.bls.gov/regions/southeast/news-release/areaemployment_miami.htm)



Source: [U.S. Census American Community Survey 2017](#)

## **FAMILIAL STATUS**

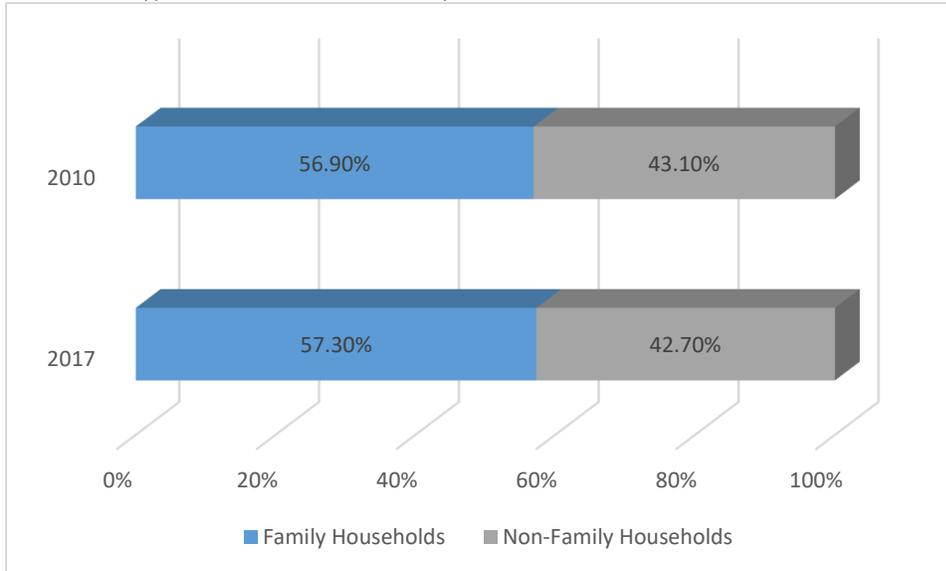
According to the Fair Housing Act, unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. Familial status is defined as families with children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

The City of Miami’s 2010-2017 population growth coincided with changes to its most common household type (Table FS-1 below). While the *2014-2018 Consolidated Plan* found a shift in the type of City households towards non-family households from 2000 to 2010, this trend has since reverted, as non-family households decreased by .04 percent since 2010, but still comprise 42.7 percent of all households in the City. Recent data shows an increase in family households, which now stands at 57.3 percent of households. Within this type, the “husband-wife family” category increased by 3.3 percent (9,158 households) and now comprises 34.6 percent of all households. The increase in family households is also reflected in significant increases in both average household and family size.

The only household type to experience a steady decline has been the “female householder, with no husband present” with or without children under 18 years old. Since 2010, this household type has decreased 2.3 percent (1,716 households). This inversely correlates to the increase in “family households” and follows a national trend where dual-income households are becoming more of a necessity to deal with the rising costs of living in large metropolitan cities such as Miami. According to a 2015 report from

the Pew Research Center titled “Parenting in America,” 60 percent of US households were dual-income families in 2012, compared to just about 25% in 1960.

Chart FS-1: Type of Households in the City of Miami



Source: U.S. Census Bureau, 2000, 2010, 2017

Table FS-1: Changes in Household Type 2000-2017

Household Type	2017		2010		2000		Change 2010-2017	
	#	%	#	%	#	%	#	%
<b>Total Households</b>	170,005	100%	158,317	100%	134,198	100%	11,688	7.4%
<b>Family Households</b>	97,495	57.3%	90,032	56.9%	83,281	62.1%	7,463	8.3%
<i>With own children under 18 years old</i>	36,537	21.5%	35,903	22.7%	35,277	26.3%	634	1.8%
<b>Husband Wife family (2010)/ Married Couple family (2000)</b>	<b>58,768</b>	<b>34.6%</b>	49,610	31.3%	49,139	36.6%	9,158	18.5%
<i>With own children under 18 years old</i>	21,929	12.9%	18,515	11.7%	19,741	14.7%	3,414	18.4%
<b>Female householder, no husband present</b>	<b>26,917</b>	<b>15.8%</b>	28,633	18.1%	25,029	18.7%	-1,716	-6.0%
<i>With own children under 18 years old</i>	11,843	7.0%	13,213	8.3%	12,357	9.2%	-1,370	-0.4%
<b>Non-Family Households</b>	<b>72,510</b>	<b>42.7%</b>	68,285	43.1%	50,917	37.9%	4,225	6.2%
<i>Householder living alone</i>	60,182	35.4%	52,644	33.3%	40,834	30.4%	7,538	14.3%
<i>Householder 65 years and over</i>	18,871	11.1%	17,812	11.3%	16,723	12.5%	1,059	5.9%
<b>Average Household Size</b>	2.67		2.47		2.61		(x)	
<b>Average Family Size</b>	3.56		3.15		3.25		(x)	

Source: U.S. Census Bureau, 2000, 2010, 2017

## **PERSONS WITH DISABILITIES**

The Fair Housing Act provides additional protection to those individuals that have a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS-related complex and mental retardation) that substantially limits one or more major life activities. The Fair Housing Act has three broad purposes in relation to people with disabilities: to end segregation of the housing available to people who have disabilities; to give people with disabilities greater opportunity to choose where they want to live; and to assure that reasonable accommodations be made to the individual needs of people with disabilities in securing and using housing. Sadly, there has been little research done on the disabled population in South Florida and/or Miami so it is difficult to truly identify housing needs for this population.

Of the estimated 52,379 persons in the City of Miami who have a disability (12 percent of the total population), 36.1 percent are 65 years and over, 8.3 percent are aged 18 to 64, and 5.36 percent are ages 5 to 17. In the 65+ age group, the bulk of persons have ambulatory (26.1 percent) and independent (20.2 percent) living difficulty.

Table DIS-1: Disability Characteristics

<i>Subject</i>	<i>Total</i>	<i>With a disability</i>	<i>Percent with a disability</i>
<i>Total civilian non-institutionalized population</i>	436,285	52,379	12.01%
<b><i>Population under 5 years</i></b>	<b>27,322</b>	<b>133</b>	<b>0.49%</b>
<b><i>Population 5 to 17 years</i></b>	<b>51,743</b>	<b>2771</b>	<b>5.36%</b>
<i>With a hearing difficulty</i>		608	1.18%
<i>With a vision difficulty</i>		642	1.24%
<i>With a cognitive difficulty</i>		1842	3.56%
<i>With an ambulatory difficulty</i>		685	1.32%
<i>With a self-care difficulty</i>		685	1.32%
<b><i>Population 18 to 64 years</i></b>	<b>285,878</b>	<b>23,751</b>	<b>8.31%</b>
<i>With a hearing difficulty</i>		3499	1.22%
<i>With a vision difficulty</i>		5206	1.82%
<i>With a cognitive difficulty</i>		11763	4.11%
<i>With an ambulatory difficulty</i>		12383	4.33%
<i>With a self-care difficulty</i>		5037	1.76%
<i>With an independent living difficulty</i>		9833	3.44%
<b><i>Population 65 years and over</i></b>	<b>71,342</b>	<b>25,724</b>	<b>36.06%</b>
<i>With a hearing difficulty</i>		6584	9.23%
<i>With a vision difficulty</i>		5782	8.10%
<i>With a cognitive difficulty</i>		10007	14.03%
<i>With an ambulatory difficulty</i>		18603	26.08%
<i>With a self-care difficulty</i>		8935	12.52%
<i>With an independent living difficulty</i>		14384	20.16%

Source: US Census Bureau, American Community Survey 2013-2017, 5-Year estimates (S1810))

Under Section 504 of the Rehabilitation Act of 1973, new **federally funded** multi-family housing projects (including public housing projects) shall be designed and constructed to be readily accessible to and usable by individuals with handicaps. A minimum of five percent (5%) of the total dwelling units or at least one unit in a multi-family housing project, whichever is greater, shall be made accessible for persons with mobility impairments. An additional two percent (2%) of the units (but not less than one unit) in such a project shall be accessible for persons with hearing or vision impairments (24 CFR 8.22) This applies to multi-family housing projects (containing five or more dwelling units (24 CFR 8.3) that are designed, constructed, or altered after July 11, 1988.

As to local requirements, the Florida Department of Business and Professional Regulation indicates on its website that Florida is one of only five states whose accessibility codes have been certified by the federal Department of Justice as being in compliance with the Americans with Disabilities Act. The Florida Accessibility Code for Building is available on-line. Building owners may apply to the Florida Building Commission for waivers from the code if faced with extreme or unnecessary hardship in meeting the code requirements, and/or in the event their building qualifies as historical. The 2012 Florida Accessibility Code for Building Construction was adopted (Florida Statutes, Section 553.503) for consistency with the 2010 ADA standards for accessible design. It is 206 pages long. Because of the complexities of balancing the rights of the physically disabled and the technically specific requirements of the built environment, no single agency has been charged with enforcement of all issues pertaining to accessibility. In relation to the Florida Building Code’s Accessibility Requirements, local governments and their code enforcement agencies are responsible for the enforcement of the requirements.

Besides this, the City of Miami does have a designated ADA liaison who receives disability discrimination or accommodation grievance forms from the public in relation to accessing City programs, services or activities. After conferring with this liaison, she indicated that she received seven formal complaints since 2015 related to the City’s website, sidewalks, accessibility, and labor related issues. There were no complaints related to housing. Please note that the City is not a landlord and operates no housing and so housing-related matters concerning “reasonable accommodations,” are most frequently handled within the landlord-tenant relationship.

The City does receive a handful of reasonable accommodation requests from its Section 8 moderate rehabilitation clients, who are based at specific buildings within the City. Table DIS-2 below shows a quick recap of those requests during the last several calendar years and their basis, in each case. The bulk of the cases are tied to the client’s physical limitations, and a request to be transferred to a first-floor unit. Most of the Section 8 moderate rehabilitation contracts are in smaller/mid-size two-story buildings with no elevator. Aside from this, most of the City’s Section 8 moderate rehabilitation clients are elderly/handicapped, and it is not uncommon to find seniors that suffer from some type of physical ailment.

Table DIS-2: City of Miami Section 8 Mod-Rehab Reasonable Accommodation Requests

Year	Total Requests	Type of Request		
		Mental Health	Physical Disability	Allergies
2011	4	0	3	1
2012	1	0	1	0
2013	4	1	3	0
2014	5	2	3	0
2015	6	2	3	1
2016	10	0	10	0
2017	9	2	7	0

2018	5	1	4	0
2019	8	1	7	0

Source: City of Miami HCD – Section 8 program

In June 2014, the Board of Miami-Dade County Commissioners approved an ordinance establishing disabled housing set aside incentives for County funded rental housing projects and homeownership projects, creating Chapter 17, Article XI of the Miami-Dade County Code. The Code addresses how “as part of any competitive process for the acquisition, constructions or rehabilitation of Rental Housing Projects of Homeownership projects, the County Mayor . . . shall provide additional incentives, including but not limited to awarding extra points to those developers and applicants who proseed **up to five percent (5%) additional set aside units** for the Disabled Households beyond that which may be required by applicable, federal, state or local fair housing laws or other applicable laws.” In the County Code, a disabled household means any moderate, low, very low (as defined by Florida Statutes) or extremely low income households (as defined in 17-131 of the Miami-Dade County Code) that has one or more persons who (a) have a physical impairment or mental impairment that substantially limits one or more major life activities (b) have a record of such impairment; or (c) are regarded as having such an impairment in accordance with the Federal Fair Housing Act, State of Florida Fair Housing Act, and Chapter 11A of the Code of Miami-Dade County.

### **COMMUNITY RESIDENCES (AKA COMMUNITY/GROUP HOMES)**

The Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of non-disabled persons. An example would be an ordinance prohibiting housing for persons with disabilities or a specific type of disability, such as mental illness, from locating in a particular area, while allowing other groups of unrelated individuals to live together in that area.

In the Olmstead Supreme Court decision, *Olmstead v. L.C.*, 527 U.S. 581 (1999), the Court ruled that “states are required to place persons with mental disabilities in community settings rather than in institutions when the State’s treatment professionals have determined that community placement is appropriate, the transfer from institutional care to a less restrictive setting is not opposed by the affected individual, and the placement can be reasonably accommodated, taking into account the resources available to the State and the needs of others with mental disabilities.” Two primary purposes of a group home – especially those for the disabled -- are community integration and providing a non-institutional experience in accordance with the Olmstead Supreme Court decision. By holding group residences to the same standards applied to other residential uses occupied by a family, housing choice for the disabled is not hindered.

Section 6.2 of Miami’s Zoning Code (Miami 21) addresses **community residences** and similar homes/facilities. A Zoning verification is required in order to confirm State-established distance requirements outlined in the section and all such facilities are required to provide a signed and sealed survey to the City’s Office of Zoning which demonstrates that the distance limitations pursuant to state statutes are met.

To the extent applicable by state law, the location of a facility may be denied if it results in an over concentration of Community Residences in proximity to the site selected such that the nature and character of the Neighborhood would be substantially altered.

As per FL Statutes, a community residential home is defined as a dwelling unit licensed to serve residents who are clients of the Department of Elderly Affairs, the Agency for Persons with Disabilities, the Department of Juvenile Justice, or the Department of Children and Families or licensed by the Agency for Health Care Administration which provides a living environment for 7 to 14 unrelated residents who operate as the functional equivalent of a family, including such supervision and care by supportive staff as may be necessary to meet the physical, emotional, and social needs of the residents.

The residence standards outlined in the City of Miami Zoning Code (Miami21) indicate as follows:

- **Community Residences of six (6) or fewer residents** shall not be located within a radius of one-thousand **(1,000) feet** of another. Such homes with six (6) or fewer residents shall not be required to comply with the notification provisions of this section; provided that, prior to licensing, the sponsoring agency provides the Office of Zoning with the most recently published data compiled from the licensing entities that identifies all community residential homes within the jurisdictional limits of the City in order to show that no other community residential home is within a radius of one-thousand (1,000) feet of the proposed home with six (6) or fewer residents. At the time of home occupancy, the sponsoring agency must notify the City of Miami Office of Zoning that the home is licensed by the licensing entity. As per State law, Homes of six or fewer residents which otherwise meet the definition of a community residential home shall be allowed in single-family or multifamily zoning without approval by the local government, provided that such homes meet the distance requirement noted.
  
- **Community Residences** servicing seven **(7) to fourteen (14) residents** shall not be located within a radius of twelve-hundred **(1,200) feet** of another. When a site for a community residential home servicing seven (7) to fourteen (14) residents or similar assisted living facility has been selected by a sponsoring agency in an area that allows multifamily, the agency shall notify the Planning Director in writing and include in such notice the specific address of the site, the residential licensing category, the number of residents, and the community support requirements of the program. Such notice shall also contain a statement from the licensing entity indicating the licensing status of the proposed assisted living facility or community residential home and specifying how the home meets applicable licensing criteria for the safe care and supervision of the clients in the home. The sponsoring agency shall also provide to the City the most recently published data compiled from the licensing entities that identifies all assisted living facilities, adult family-care homes, or community residential homes within the jurisdictional limits of the City. The Office of Zoning shall review the notification of the sponsoring agency in accordance with Transect regulations.

Pursuant to review by the Planning Department, the City may:

1. Determine that the siting of the assisted living facility or community residential home is in accordance with this code and approve the siting. If the siting is approved, the sponsoring agency may establish the home at the site selected.
2. Fail to respond within sixty (60) days. If the City fails to respond within such time, the sponsoring agency may establish the home at the site selected.
3. Deny the siting of the home.

- **Adult Family-Care Homes** of five (5) or fewer residents shall not be located within a radius of one-thousand (1,000) feet of another.

A “resident,” for the purpose of a **Community Residence**, may include any persons as defined in the following statutes:

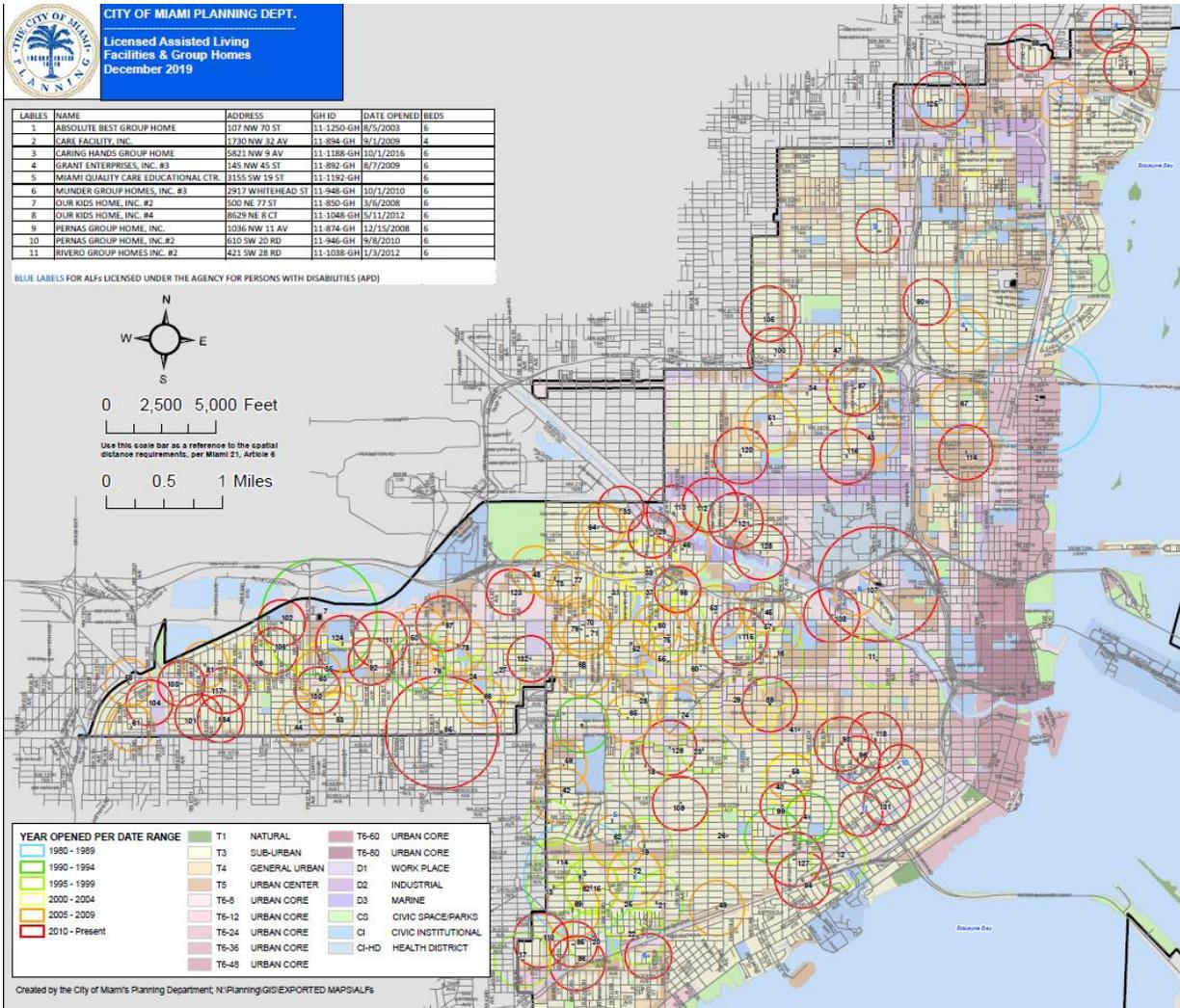
- A disabled adult or frail elder as defined in section 429.65 (8) and (9), Florida Statutes
- A physically disabled or handicapped person as defined in section 760.22(7), Florida Statutes
- A developmentally disabled person as defined in section 393.063(9), Florida Statutes
- A non-dangerous mentally ill person as defined in section 394.455(18), Florida Statutes; or
- A child as defined in section 39.01(12), Florida Statutes

Section 429.01 through 429.54, Florida Statutes is known as the Assisted Living Facilities Act. Pursuant to Section 429.02, Fla. Stat. "assisted living facility" means any building or buildings, section or distinct part of a building, private home, boarding home, home for the aged, or other residential facility, whether operated for profit or not, which undertakes through its ownership or management to provide housing, meals, and one or more personal services for a period exceeding 24 hours to one or more adults who are not relatives of the owner or administrator.

The Agency for Persons with Disabilities (APD), which issues state licenses for group homes, serves people with the following disabilities: autism, cerebral palsy, spina bifida, intellectual disabilities, Down syndrome, Prader-Willi syndrome, and children ages 3-5 who are at a high risk of a developmental disability.

The Department of Planning and Zoning works with the State’s Agency for Health Care Administration (AHCA), which monitors community homes, and with Agency for Persons with Disabilities (APD), which monitors group homes. The State’s Division of Health Quality Assurance licenses, and/or certifies, and regulates 40 different types of health care providers, including hospitals, nursing homes, assisted living facilities, and home health agencies. The City’s Planning and Zoning Department maintains an updated database of all Group Homes and Assisted Living Facilities within its boundaries that is updated to reflect the latest information from all participating state agencies (AHCA, APD). Via GIS capabilities, the Planning & Zoning Department performs internal distance separation requirements to analyze and monitor location, number of beds, state license expiration dates, and certificates of use issued (when applicable) for ALFs and group homes.

As of November 12, 2019, there are 139 licensed Adult Living Facilities located in the City of Miami, FL. One-hundred and twenty-eight are under the purview of the Florida Agency for Health Care Administration (AHCA) and eleven are under the Agency for Persons with Disabilities (APD).



## PERSONS WITH HIV/AIDS

The City of Miami serves as the administrator of the formula grant-funded Housing Opportunities for Persons with AIDS (HOPWA) program for the entire geographical area of Miami-Dade County. The Miami-Dade County metropolitan area has the fourth highest number of living AIDS cases in the country (the top ranked in order of highest number of cases are the metropolitan areas of New York City, Los Angeles, and Washington, D.C.). HIV/AIDS disproportionately affects minority populations in Miami-Dade County, as is the case nationally.

The goal and intent of the local HOPWA Program is to ensure that a continuum of housing options and related housing services is available to low income persons with acquired immunodeficiency syndrome (AIDS) or related diseases (HIV) and their families to prevent homelessness of such individuals and their families. The City provides Tenant-Based Rental Assistance (TBRA) to approximately 825 clients who have AIDS and are 80% area median income (AMI) or below. The HOPWA TBRA application and waitlist processes are managed via one advertised application period, followed by a final waitlist established via a random computerized lottery. At time of application submission, prospective participants must submit

a Client Medical Eligibility Form, completed and signed by their physician, certifying that the applicant has received an AIDS diagnosis. Said form is part of the application packet. The opening of the waitlist is marketed through the county-wide HIV/AIDS care network to reach persons with AIDS, including but not limited to, Ryan White Case agencies, public hospitals and clinics.

The City uses HOPWA monies to provide operational subsidies for 26 set-aside, project based units for people living with AIDS (PLWAs) at three different developments throughout Miami-Dade County. The City makes every effort to support project based units at sites throughout the County to provide location options to HOPWA clients as a cost-effective permanent housing alternative.

The City also offers Short-Term Rental and Mortgage Utility Assistance (STRMU) of no more than 21 weeks to approximately 50 persons each year who are HIV+, who are 80% AMI or below, and who are not participants in the TBRA program. This program is administered by a project sponsor (non-profit) selected via an advertised, Request for Proposals process and STRMU applicants are processed on a first-come, first-eligible basis, requiring an HIV+ diagnosis by a licensed medical professional.

Upon entrance into the HOPWA TBRA program, all clients are provided with the TBRA Client Handbook which provides the most important information concerning the HOPWA TBRA program, its requirements and potential violations. All clients must sign the last page indicating their review of the Handbook, which they keep for reference. Attachment B of the handbook includes a concise review on the federal Fair Housing Act and the local Miami-Dade County ordinance. The three-page Attachment also advises the HOPWA TBRA client of steps to follow in the event they feel their fair housing rights have been violated and notes the multiple locations where they can report the alleged fair housing violation for review by a proper authority.

The *2017 HIV/AIDS Surveillance Fact Sheet* issued by the Florida Department of Health in Miami-Dade County noted that there were 27,969 persons living with HIV, 1,195 newly diagnosed HIV cases and 502 newly diagnosed AIDS cases in 2017. Approximately 59 percent of the cases were Hispanic; 32 percent of the cases were Black and 8 percent were White.

As required by federal law and state law, a person's HIV/AIDS status is exempt from all public record inquiries. To that end, all public materials (leases, payments, landlord packages) associated with the City's HOPWA TBRA and/or STRMU programs make no mention of the client's medical diagnosis of AIDS or HIV (respectively). Because of this, the City has had few issues and no reported cases of discrimination by landlords of its tenants due to their AIDS status.

*The City of Miami HOPWA Program Policies and Procedures Manual (Manual)* provides guidance on tenant/client and landlord rights and responsibilities in relation to Fair Housing. Chapter 15 of the Manual is entitled *Equal Opportunity and Reasonable Accommodation* and elaborates on federal and local laws related to this subject. The Manual defines *disability* as follows: Having one or more of the following:

- a) A physical or mental impairment that substantially limits one or more of the major life activities of an individual;
- b) A record of such an impairment;
- c) Being regarded as having such an impairment;

To clarify the reference above to *a physical or mental impairment that “substantially limits”* a person in one or more of the *“major life activities,”* this means that the physical or mental impairment causes substantial difficulty in a person’s ability to:

- See, hear, speak, or breathe
- Learn, think, or read
- Work, walk, or perform manual tasks
- Care for himself or herself
- Engage in some other “major life activity.”

As per the HOPWA Manual Chapter 15-5, three requirements must be met in order for a HOPWA client to be granted a reasonable accommodation and these are as follows:

- a) the subject of the request is a qualified "individual with a disability," as defined above;
- b) the requested accommodation is necessary, because of the disability, to provide an equal opportunity to use and enjoy the housing. To show that a requested accommodation may be *necessary*, there must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability (see *Joint Statement of the Department of Housing and Urban Development and the Department of Justice on Reasonable Accommodations under the Fair Housing Act, May 14, 2004*); and
- c) the requested accommodation is reasonable.

A 2016 survey found that over 50% of all respondents had a monthly income of less than \$1,000, thus were living at the federal poverty level (2016 poverty level was \$990 per month for a single household). Based on 2016 Fair Market Rents, a single household at poverty level would be required to spend approximately 78 percent of its household income just for an efficiency and 98 percent of their income for a one-bedroom. Even in a roommate situation, a single person at poverty level would need to spend 63 percent of their income to afford to live in a two-bedroom unit at FMR. Individuals receiving Social Security Income (SSI) could not afford an efficiency or a one-bedroom unit even if shared. A household of three at the Poverty Level was required to spend approximately 74 percent of its income on housing for a two-bedroom unit. Close to 75 percent of the 2016 survey respondents reported that they were NOT receiving housing assistance of any kind. While benefits and wages have not significantly increased since 2016, Miami-Dade County rents have drastically increased. Based on 2020 Fair Markets compared to those in 2016, rent for an efficiency has increased by 40 percent with one bedroom units experiencing a 32 percent rent increase and two bedroom units experiencing a 30 percent increase. The 2017 Gaps and Needs Analysis found that there is a need amongst PLWAs for 10,116 subsidized rental units or rent subsidies.

To recap, below is important crucial data gathered through the 2016 survey of Persons Living with HIV/AIDS (PLWHA) and Persons Living with HIV (PLWH) for purposes of this AI:

- There has been some improvement in finding accessible units with 11 percent reporting that it is not easy to find housing accessible for persons with disability housing as there are only some accessible apartments available (compared to 17.1 percent in 2014) and the same percentage (11.1 percent) stated that is almost impossible as there are very few accessible units, compared to 22.5 percent in 2014.

- Respondents reported physical conditions that adversely impacted housing needs with the top two being depression or mental illness (21 percent) and symptoms of HIV/AIDS, such as neuropathy, fatigue or dementia (19.7 percent). Close to 11 percent reported having lost housing they had prior to entering residential treatment or hospitalization.
- Close to 13 percent of respondents reported having experienced discrimination. When asked of the basis of the discrimination experienced, the top three responses were: HIV status (nearly half of all reporting discrimination), sexual orientation and status as an ex-offender.
- Close to 11 percent of respondents reported that they had experienced a problem with landlords telling others of their HIV/AIDS status without consent.

## Housing

According to 2017 US Census 1-Year Estimates (B25002, B25004), there are currently 201,784 housing units in the City of Miami. The City’s housing supply is mainly comprised of structures with 20 or more units (89,589 units/44.4 percent) and 1-unit detached structures (48,663 units/24.1 percent). Structures of 20 or more units have steadily increased since 2000 due to two waves of predominantly high-end, multi-family construction activity during the building boom of 2005-2007 and the 2012-2017 post-recession period. Since 2010, the City of Miami has added 14,018 units (18.5 percent increase) in 20+ unit structures, of which, 7,678 units have been constructed since 2015. National and regional markets have been undergoing a significant shift from owner occupancy to rental housing. In addition to the demographic forces described above, stagnant household incomes and tightening credit requirements for home mortgages have driven a growing number of households into rental housing. The City of Miami’s homeownership rate is now the lowest among benchmark cities in the US.

Despite significant new construction activity since 2010, the percentage of the City of Miami’s occupied housing units continues to decrease coinciding with a steady increase in both the total and percentage of vacant housing units in the City.

Table HSG-1: Housing Occupancy 2000, 2010, 2017

Housing Occupancy	2017		2010		2000		Change 2010-2017	
	#	%	#	%	#	%	#	%
<b>Total Housing Units</b>	<b>201,784</b>	100.0%	183,994	100.0%	148,388	100.0%	17,790	9.7%
<b>Occupied Housing Units</b>	170,005	84.3%	158,317	86.0%	134,198	90.4%	11,688	7.4%
<b>Vacant Housing Units</b>	31,779	15.7%	25,677	14.0%	14,190	9.6%	6,102	23.8%
<b>Homeowner Vacancy Rate</b>	3.8		7.2		2.9		(X)	
<b>Rental Vacancy Rate</b>	8.3		9.2		6.6		(X)	

Source: 2014-2018 Five-Year Consolidated Plan, U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates (B25002, B25004)

## Vacancy Rates

Vacancy rates can help determine the health of a housing market. Table HSG-2 below shows the City having 31,779 vacant units (15.7%) which represents a *high vacancy rate*. This would indicate that there is no shortage of vacant units and that market rates would need to adjust down to meet supply and demand forces, therefore, making housing more affordable. However, if we dig deeper into census data,

we find that out of the 31,779 vacant units in the City there are 18,755 units that are not actually available in the housing market as these are units utilized for recreational, seasonal or occasional use or that are rented/owned but left unoccupied. The actual number of vacant units available in Miami is 13,024 or 6.5 percent, just below the 7 to 8 percent rate considered to be a healthy vacancy rate<sup>8</sup>. Low vacancy rates contribute to poor housing affordability which is what City residents are currently experiencing.

Table HSG-2: Vacancy and Occupancy Status

		Units	Percentage
<b>Total Housing Units</b>		201,784	100%
<b>Total Vacant Units</b>		31,779	15.7%
<b>Available Units for Rent</b>	11,027	13,024	6.5%
<b>Available Units for Sale</b>	1,997		
<b>Vacant Units NOT available for Rent or Sale</b>		18,755	9.29%

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates (B25002, B25004)

Data pulled from the State of the Cities Data System on City of Miami permits found that as expected, multi-family requests have dominated the market for years, with the peaks being 2006 (7,481 units permitted), prior to the recession and housing bust, and then again in 2015, post housing recovery, when just over 6300 units were permitted. It bears mention that after the housing market collapse, the City of Miami was grappling with some of the highest foreclosure rates in the country and as Table HSG-3 indicates, permits for new construction drastically declined from 2008 through 2012.

The housing market report on Miami-Dade County by Reinhold P. Wolff Economic Research found a significant increase in building permit activity since 2013 (see Table HSG-3). During this period, there were 51,334 new housing units authorized by building permits for multi-family housing and 12,572 for single-family units. The majority of multi-family permits authorized have been in the City of Miami, including 60 percent (2,899 units) of Miami-Dade County’s total since 2016. We should note, that some of this concentration in the City could potentially be attributed to Miami’s current Zoning Code, Miami 21, passed in late 2009 and implemented in 2010, which allows for significant vertical growth – by right - in certain portions of the City thereby facilitating multi-family development.

Table HSG-3: New Housing Units Authorized by Building Permits, **Miami-Dade County** 2016, 4<sup>th</sup> Quarter, 2017

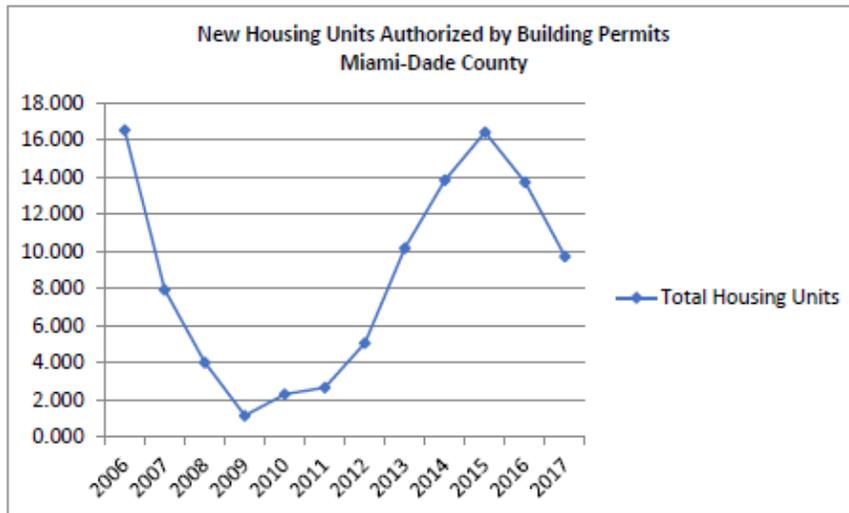
Year	Single Family	Multi Family	Total
2006	6,356	10,180	16,536
2007	3,691	4,240	7,931
2008	1,161	2,865	4,026
2009	565	585	1,150
2010	930	1,367	2,297
2011	973	1,684	2,657
2012	1,904	3,160	5,064

<sup>8</sup> Vacancy: America’s Other Housing Crisis - <https://www.citylab.com/equity/2018/07/vacancy-americas-other-housing-crisis/565901/>

Year	Single Family	Multi Family	Total
2013	2,092	8,087	10,179
2014	2,482	11,361	13,843
2015	2,772	13,649	16,421
2016	2,955	10,777	13,732
2017	2,271	7,460	9,731
Percentage Change			
2015 vs 2014	+11.7%	+20.1%	+18.6%
2016 vs 2015	+6.6%	-21.0%	-16.4%
2017 vs 2016	-23.1%	-30.8%	-29.1%

Source: Reinhold Wolff Economic Research, Inc.

Graph HSG-3.1: New Housing Authorized by Building Permits, Miami-Dade County



Source: Analysis by Reinhold P. Wolff Economic Research, Inc.

Table HSG-4: Multi-Family Housing Units Authorized by Building Permit by Major Areas. Miami-Dade County and Selected Municipalities

Area	Three Month Ending		
	12/31/2016	9/30/2017	12/30/2017
<b>Total Miami-Dade County</b>	1,872	2,059	927
<b>Unincorporated Areas</b>	234	632	708
<b>Miami</b>	1,560	1,175	164
<b>Miami Beach</b>	0	0	0
<b>Coral Gables</b>	0	0	0
<b>Cutler Bay</b>	0	0	0
<b>Doral</b>	0	231	6

Area	Three Month Ending		
	12/31/2016	9/30/2017	12/30/2017
Hialeah	63	0	31
Hialeah Gardens	0	0	0
Homestead	0	0	0
North Miami Beach	0	0	0
North Bay Village	0	0	0
Medley Town	0	0	0
Opa-Locka	0	0	0
Other Areas	15	21	18
<b>Total Miami-Dade County</b>			
Time Period	Percentage Change		
Oct-Dec, 2017 vs Jul-Sep, 2017	-55.0%		
Oct-Dec, 2017 vs Jul-Sep, 2016	-50.5%		

Source: Reinhold Wolff Economic Research, Inc.

### Affordable Housing Demand/Supply Analysis by Area Median Income

Housing affordability in Miami-Dade cuts across a wide range of households. The needs of households on different rungs of the income ladder differ considerably, and is made even more complex by changing age, household formation, family size and composition, and housing preferences. HUD’s basic classification system pegs affordable housing needs to how much money a household earns relative to the Area Median Income (AMI), or median household income of the County or metropolitan region. HUD classifies households into four categories relative to AMI:

- **Extremely Low Income (ELI):** Households with income at or below the Poverty Guideline or 30% of AMI, whichever is higher;
- **Very Low Income (VLI):** Households with income between 31% and 50% of AMI;
- **Low Income (LI):** Households with income between 51% and 80% of AMI Middle Income (MI): Households with income between 81% and 100% of AMI; and
- **Moderate Income (MI):** Households with incomes from 80% to 120% of AMI.

In May 2019, the FIU Metropolitan Center completed an analysis of housing supply and demand, at each HUD defined income level. The analysis looks at the number of households at each income level, the rent and purchase price affordable to each income level, and the City’s supply of housing units at those rents/prices. The analysis of affordable housing supply/demand indicates the City has a shortage of 69,465 affordable housing units.

Table HSG-5: Affordable Housing Demand/Supply Analysis – **Owner Housing Analysis**

	Income Category	Total # of Households (Demand)	Home Purchased at Affordable Price Levels		# of Owner Units within Affordable Price Range (Supply)	Surplus/GAP within Affordable Housing Range
<b>Very Low Income</b>	31-50% AMI	-	31% AMI	50% AMI	31-50% AMI	-
	\$20,163-\$32,261	25,814	\$61,701	\$96,783	1,729 (6.7%)	<b>24,085</b>
<b>Moderate Income</b>	81-120% AMI	-	51% AMI	80% AMI	51-80% AMI	-
	\$32,262-\$48,392	23,964	\$96,786	\$145,176	2,749 (11.4%)	<b>21,215</b>

Source: FIU Metropolitan Center, May 2019

Table HSG-6: Affordable Housing Demand/Supply Analysis – **Renter Housing Analysis**

	Income Category	Total # of Renter Households (Demand)	Affordable Rent Levels		# of Renter Units within Affordable Price Range (Supply)	Surplus/GAP within Affordable Housing Range
<b>Extremely Low Income</b>	0-30% AMI	-	0% AMI	30% AMI	0-30% AMI	-
	\$0-\$12,098	22,680	\$0	\$302	7,077 (31.2%)	<b>15,603</b>
<b>Very Low Income</b>	31-50% AMI	-	31% AMI	50% AMI	31-50% AMI	-
	\$12,099-\$20,163	7,764	\$303	\$504	3,698 (47.6%)	<b>4,066</b>
<b>Low Income</b>	51-80% AMI	-	51% AMI	80% AMI	51-80% AMI	-
	\$20,164-\$32,261	19,067	\$505	\$806	14,571 (76.4%)	<b>4,496</b>
<b>Moderate Income</b>	81-120% AMI	-	51% AMI	80% AMI	51-80% AMI	-
	\$32,262-\$48,392	19,003	\$807	\$1,209	37,720 (198%)	+18,716

Source: FIU Metropolitan Center, May 2019

The data collected above help explain why the City of Miami has become increasingly unaffordable and cost-burdening to its residents—especially those seeking low-rental options. Historically, Miami has been a boom-bust market whose volatility has not been kind to the City’s low-income residents. During the housing boom of 2005-2007, many of the City’s urban core neighborhoods were rediscovered and gentrification became prevalent in areas such as Wynwood and Coconut Grove (West). During the recession, the volume of foreclosures and vacant buildings was highest from 2007 to 2009 and property values dropped 50 to 60 percent, reaching their lowest levels in April 2011. The rental market in the City of Miami was deeply affected by the foreclosure crisis too in that it pushed many middle-income homeowners, who could no longer keep their homes, into the rental market creating a squeeze in the low cost rental supply and pushing up rental prices.

Front and center to the change in the City’s housing market is household mobility and income trends. According to the US Census, ACS, 2017 1-Year Estimates, 68.1 percent of the occupied households in the City of Miami moved into their unit in 2010 or later. In other words, over half of the City’s households have moved into their current unit within the past decade. If one takes into consideration the figures from 2000 to present, a total of 143,685 or 85 percent of the City’s households moved into their unit during this time frame. The City of Miami is a City in flux, whose housing demands are changing in real time. The City’s household wealth is also changing. According to Table HIP-1, which is a comparison between the ACS 2015 and the ACS 2017 1-Yr. estimates, the City’s share of households earning less than \$10,000 fell from 17.2 percent to 12.7 percent. In fact, during this same period, the share of every low-income category fell while higher income households rose. It is important to understand that these figures do not necessarily indicate that the City “lost” residents in low-income categories, but perhaps because the City’s landscape has changed, it quite possibly has added more households to the higher income brackets.

This information, combined with census demographic data that illustrated a dramatic change in population growth, household wealth, household mobility, and household type towards non-family help us make the assumption that much of the new housing supply developed in the City over the last decade was not intended to meet the demands of its residents, but instead has attracted wealthier individuals, perhaps professionals without families, interested in living in the urban core and what the revitalization of the City's central business district and surrounding neighborhoods like Brickell, Mid-town, Wynwood, and the Design District has to offer. A simple fact remains: despite the market forces that increased the supply of housing options in the City of Miami, nearly half the City households cannot find housing that would not cost-burden them. Perhaps more ominous in a City of renters that has experienced a robust injection of multi-family units over the past decade: a staggering 62.8% of the City's renter households are cost-burdened. The high rates of cost burden indicate that the available affordable housing stock is *not* meeting the needs of City residents. The demand for low-cost rental options in Miami is corroborated by an article in Bloomberg Business Week in which a private affordable housing developer stated that, especially near the job core and transit lines, there is an insufficient supply of low-cost rental options compared to the demand. The article quoted that the demand "is so large that even if developers had the resources to build five times as many units per year in the area, thousands would still be in need."

Therefore, the following broad statement can be made - *Miami's housing market does not provide sufficient:*

**Affordable housing options —especially low-cost rental units:** Over half the City of Miami is cost-burdened and a staggering segment of the cost-burdened (62.8 percent) and severely cost-burdened (35.4 percent) households in the City of Miami are renters. Considering the majority of the City's households rent, there is a general need for affordable rental options for households across income brackets.

**Small multi-family unit structures ideal for affordable rental:** While the City experienced an increase in housing units, there were notable decreases in small multi-family structure types. Of particular note was the loss of small multi-family units in structures containing two to nine units. These structure types traditionally support affordable rental housing in older urban neighborhoods and are often considered ideal affordable rental communities.

**Affordable rental units with three or more bedrooms large families:** Occupancy data by tenure illustrated that the smaller the unit size, the greater the chance it will be occupied by a renter. Therefore, families that require more than two bedrooms may have trouble finding rental opportunities in the City of Miami—the choices are even more limited if the family is cost-burdened.

**Affordable rental options are needed to accommodate small families:** Small households have a greater need than the other population sub-categories. Approximately, 35,585 small households are cost-burdened or severely cost-burdened in the City of Miami the greatest majority of these households are renters, especially in the low-income categories.

**Affordable rental and single-family rehabilitation programs for the City's elderly population:** According to the US Census, 16.7 percent of City residents are 65 years and over<sup>9</sup>. These statistics are important to consider in light that the growth rate of the elderly population is low comparatively to the workforce age residents in the City, but make up a significant share of the City's population comparatively to other large

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<sup>9</sup> US Census, 2013-2017 ACS, 5-Year Estimates (S0103)

cities. The CHAS data analyzed in the Needs Assessment found that a significant portion of the population in the lowest income category are made up of elderly households and, thus, elderly renter and homeowner households experience high rates of housing problems due to high costs – this group is the only household type in the City with a significant number of homeowners experiencing cost-burden.

**Tenant-based HOPWA rental assistance** to help meet the need of persons living with HIV/AIDS in Miami-Dade County in need of housing assistance: A large number of persons living with HIV/AIDS in Miami-Dade County have limited income due to their disability and, thus, there is a need for more safe and affordable housing options. The 2017 Miami-Dade HIV/AIDS Housing Gap Analysis found that 10,116 persons living with HIV/AIDS in Miami-Dade County are in need of housing assistance.

**Expansion of Permanent Housing Options and Homeless Prevention and Diversion Resources:** The CoC is focused on rapidly re-housing homeless individuals and families into permanent housing. The CoC has identified the need to add up to 200 units of permanent housing for homeless households to its inventory each year, with a particular focus on chronically homeless persons, seniors (62+), unaccompanied youth (18-24), families and veterans. The CoC is also increasingly focused on diversion and prevention strategies. Diversion prevents homelessness for people seeking shelter by helping them identify immediate, alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Prevention uses rent and utility assistance along with supportive services to help households that would otherwise become homeless regain stability and remain housed. Together, these strategies are being utilized to promote system flow, making homelessness rare, brief and one-time. By enhancing strategies to prevent and divert homelessness, while also adding permanent housing strategies to enhance exit opportunities, crisis housing (emergency shelter) can be more readily available when needed.

## HOUSING STOCK AND TENURE

According to Table HST-1, owner-occupied housing units comprise 28.9 percent (49,202 units) down from 32.3 percent (51,186 units) in 2010. Renter-occupied units comprise 71.1 percent (120,803 units) of occupied units up from 65.3 percent (107,131 units) in 2010. The percentage of renter-occupied units in the City of Miami far exceeds both Miami-Dade County (48.9 percent) and the State of Florida (34.8 percent). Significantly, the average household size (3.07 persons) of owner-occupied units and renter-occupied (2.50 persons) have increased since 2010.

Table HST-1: Housing Tenure 2000, 2010, 2017

Housing Tenure	2017		2010		2000		Change 2010-2017	
	Estimate	Percent	Estimate	Percent	Estimate	Percent	Estimate	Percent
<b>Occupied Housing Units</b>	170,005	100.0%	158,317	100.0%	134,198	100.0%	11,688	7.4%
<b>Owner-Occupied</b>	49,202	28.9%	51,186	32.3%	46,836	34.9%	-1,984	-3.9%
<b>Renter-Occupied</b>	120,803	71.1%	107,131	65.3%	87,362	65.1%	13,672	12.8%
<b>Average HH Size of Owner-Occupied Unit</b>	3.07		2.67		2.79		(X)	
<b>Average HH Size of Renter-Occupied Unit</b>	2.50		2.37		2.52		(X)	

Source: 2014-2018 Five-Year Consolidated Plan, U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates (CP04)

Table HST-2: Housing Tenure by Region, 2017

Housing Tenure by Region, 2017	2017	
	Owner-Occupied	Renter-Occupied
<b>State of Florida</b>	5,010,187	2,679,777
<b>Miami-Dade County</b>	445,138	427,357
<b>City of Miami</b>	<b>49,202</b>	<b>120,803</b>

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates (CP04)

Housing choice and opportunity are characterized by several factors including affordability, location, type and bedroom distribution. The number of bedrooms in a community’s rental housing supply is particularly important as most low- and moderate-income families rent their housing units.

Table HST-3: Housing Unit Size by Tenure, 2017

Housing Tenure	OWNERS		RENTERS		TOTAL	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
<b>No bedroom</b>	901	5.9%	14,466	94.1%	15,367	100.0%
<b>1 bedroom</b>	4,927	10.2%	43,388	89.8%	48,315	100.0%
<b>2 bedrooms</b>	17,959	29.1%	43,675	70.9%	61,634	100.0%
<b>3 or more bedrooms</b>	25,415	56.9%	19,274	43.1%	44,689	100.0%
<b>Total</b>	<b>49,202</b>	<b>28.9%</b>	<b>120,803</b>	<b>71.1%</b>	<b>170,005</b>	<b>100.0%</b>

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates (B25042)

Despite the market forces that have led to the increase in housing options in the City of Miami, data shows that over half the city households cannot find housing that would not cost-burden them. The high rates of cost burden indicate that the *affordable* housing supply is not meeting the demands of city residents.

Table HST-4: Miami Selected Housing Characteristics

	2009-2013		2013-2017	
	Estimate	Percent	Estimate	Percent
<b>Total Housing Units</b>	<b>187,938</b>		<b>196,618</b>	
Occupied housing units	150,974	80.3	164,734	83.8
Vacant housing units	36,964	19.7	31,884	16.2
<b>Units in Structure</b>				
1-unit detached structure	48,816	26.0	48,740	24.8
1-unit attached structure	18,578	9.9	19,742	10.0
2 units	9,291	4.9	8,299	4.2
3 or 4 units	9,673	5.1	9,271	4.7
5 to 9 units	13,939	7.4	14,163	7.2
10 to 19 units	13,624	7.2	14,965	7.6
20 or more units	72,879	38.8	80,511	40.9
Mobile home	1,029	0.5	903	0.5

	2009-2013		2013-2017	
	Estimate	Percent	Estimate	Percent
<i>Boat/RV/van etc.</i>	109	0.1	24	0.0

Source: 2009-2013 ACS 5-Year Estimates vs 2013-2017 ACS 5-Year Estimates (DP04)

## **HOUSING UNIT SIZE**

As noted in the table below, the majority of units in the City are two-bedrooms (37.8%) followed by one-bedrooms (31.2%). Together, one- and two-bedroom housing comprises close to 70% of the housing stock. This bears mention as it indicates that most households in the City are in fact smaller-sized households and that larger families might have a more difficult time locating a residence that accommodates their size.

Table HUS-1: Miami Selected Housing Characteristics by Unit Size

	2009-2013		2013-2017	
	Estimate	Percent	Estimate	Percent
<i>Total Housing Units</i>	187,938		196,618	
<i>No bedroom</i>	11,515	6.1	14,628	7.4
<i>1 bedroom</i>	59,754	31.8	61,421	31.2
<i>2 bedrooms</i>	71,991	38.3	74,299	37.8
<i>3 bedrooms</i>	34,582	18.4	36,003	18.3
<i>4 bedrooms</i>	8,037	4.3	8,586	4.4
<i>5 or more bedrooms</i>	2,059	1.1	1,681	0.9

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates vs 2013-2017 ACS 5-Year Estimates (B25041)

## **A CITY OF RENTERS**

The City of Miami has long been a city of renters. One can especially understand the extent of this when comparing local data to the region. According to the 2013-2017 ACS 5-Year estimates, 69.8 percent of the of the total occupied housing units in the City of Miami were made up of renters, while a lower 47.8 percent of Miami-Dade County’s occupied units were renters and an even lower 35.2 percent of the State of Florida’s residents were renters.

Table CR-1: Tenure of Housing Units

	Number	Percent
<i>Renter Households</i>	114,911	69.8
<i>Home Owner Households</i>	49,823	30.2
<b><i>Total Households</i></b>	<b>164,734</b>	<b>100.0</b>

Source: U.S. Census Bureau, 2013-2017 ACS 5-Year Estimates (B25003)

Comparing statistical figures from a recent report (2017) from New York University's Furman Center and Capital One Financial Corp, the City of Miami's housing rental market would rank first in the nation with 69.8 percent renter households *surpassing Los Angeles, CA*<sup>10</sup> by a large margin.

As housing supply grew, so did the number of renters. Data also indicates that renters tend to occupy smaller size units (one- and two-bedrooms) while homeowners tend to occupy larger units (2 and 3 or more bedroom properties). Indicators support that this trend will continue.

The U.S Census defines *gross rent* as the monthly amount of rent plus the estimated average monthly cost of utilities (electricity, gas, water, and sewer) and fuel (oil, coal, kerosene, wood, etc.). *Gross rent as a percentage of income* is defined as the ratio of gross rent to household income. It is used as a measure of housing affordability by policymakers and as a determinant of eligibility for federal housing programs and is often referred to as a housing cost burden. Below Table CR-2 analyzes gross rent as a percentage of household income. As indicated, approximately 66.2% (an increase from 62.8% reported on 2011-2015 ACS 5-Year estimates) of occupied units paying rent, are paying 30 percent or more towards rent as a percentage of their household income. HUD defines cost burdened households as families who pay more than 30 percent of their income for housing.

Table CR-2: Gross Rent as a Percentage of Household Income

	2007-2011		2013-2017	
	Number	Percent	Number	Percent
<i>Occupied Units Paying Rent</i>	92,656	100.00	108,245	100.0
<i>Less than 15.0 percent</i>	5,004	5.4	6,921	6.4
<i>15.0 to 19.9 percent</i>	6,394	6.9	7,835	7.2
<i>20.0 to 24.9 percent</i>	8,797	9.5	10,374	9.6
<i>25.0 to 29.9 percent</i>	10,388	11.2	11,428	10.6
<i>30.0 to 34.9 percent</i>	9,388	10.1	10,418	9.6
<i>35.0 percent or more</i>	52,685	56.9	61,269	56.6

Source: U.S. Census Bureau, 2007-2011 ACS 5-Year Estimates vs 2013-2017 ACS 5-Year Estimates (B25070)  
 Estimated No. of Units not computed in 2013-2017 ACS = 6,666 units

Table CR-3 below shows how rents for occupied units have changed from the 2007-2011 ACS 5-Year Estimates to the 2013-2017 ACS 5-Year Estimates. A noticeable change occurred in households paying \$500-\$749 which shows an approximate 6 percentage point decrease or 3,767 units. The bulk of the rents being paid remain in the higher side of the rental scale paying \$750 or more, however, the percentage of households paying higher rents has increased from 67.3 percent to 76.6 percent. The spike in rental amounts coincides with the increase in the number of renters combined with a decline in rental housing stock.

According to NYU Furman Center's study titled "Renting in America's Largest Metropolitan Areas," which was released in March, 2016, Miami experienced a 10 percent decline in rental housing stock from 2006 to 2014. The renter population in Miami grew more quickly than the rental stock creating a rising demand for rental housing forcing rental costs to increase. The report points out, "*The Miami metro area, where the median rent was more than \$150 higher than the national benchmark while the median renter's*

<sup>10</sup> NYU Furman/Capital One National Affordable Rental Housing Landscape Research Study, [www.furmancenter.org/NationalRentalLandscape](http://www.furmancenter.org/NationalRentalLandscape)

income was over \$1,000 lower than that figure among metros nationwide, pops out as a troubling exception—a high-cost city without high incomes.”

Table CR-3: Renter-Occupied Housing Units

	2007-2011		2013-2017	
	Number	Percent	Number	Percent
<i>Occupied Units Paying Rent</i>	95,225	100.0	112,324	100.0
<b>Median Gross Rent</b>		<b>\$910</b>		<b>\$1,056</b>
<i>Less than \$200</i>	4,111	4.3	2,500	2.2
<i>\$200 to \$299</i>	4,432	4.7	5,590	5.0
<i>\$300 to \$499</i>	5,296	5.5	4,645	4.1
<i>\$500 to \$749</i>	17,349	<b>18.2</b>	13,582	<b>12.1</b>
<i>\$750 to \$999</i>	25,328	26.6	25,250	22.5
<i>\$1,000 to \$1,499</i>	25,520	26.8	32,344	28.8
<i>\$1,500 or more</i>	13,189	<b>13.9</b>	28,413	<b>25.3</b>

Source: U.S. Census Bureau, 2007-2011 ACS 5-Year Estimates vs 2013-2017 ACS 5-Year Estimates (B25063)  
Estimated No. of Units not computed in 2013-2017 ACS = 2,587 units

## **CITY HOMEOWNERS**

The state of being a City homeowner has also changed in the past decade or so. As in the previous AI, the majority of owner-occupied housing units in the City (54%) have a mortgage on their housing unit.

Table CH-1: Mortgage Status, Owner Occupied Units City of Miami

<i>Owner-occupied units</i>	<i>Number</i>	<i>Percent</i>
<i>Owner-occupied units</i>	49,823	100%
<i>Housing units with a mortgage</i>	26,873	54%
<i>Housing units without a mortgage</i>	22,950	46%

Source: U.S. Census 2013-2017 ACS 5-Year Estimates (B25081)

When looking at the selected monthly homeowner costs as a percentage of household income, these have experienced a minimal decline. The bulk (49.6%) of City homeowners are paying more than 30% of their income towards their monthly owner costs, a reality that is concerning, as noted in Table CH-2

Table CH-2: Selected Monthly Owner Costs as a Percentage of Housing Income

	<i>Number</i>	<i>Percent</i>
<i>Housing Units with a Mortgage</i>	26,530	100.0
<i>Less than 20.0 percent</i>	7,475	28.1
<i>20.0 to 24.9 percent</i>	3,054	11.5
<i>25.0 to 29.9 percent</i>	2,864	10.8
<i>30.0 to 34.9 percent</i>	2,035	7.6

35.0 percent or more	11,102	42.0
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Source: U.S. Census Bureau, 2013-2017 ACS 5-Year Estimates (B25091)

Table CH-3 indicates that the bulk of homeowners with a mortgage continues to be at the \$2,000 and up cost category (26 percent). While there has been a small decrease from the 2009-2013 ACS, it is still the group with the highest percentage in owner cost.

Table CH-3: Percent of Selected Monthly Owner Cost

	2009-2013 ACS	2013-2017 ACS
Less than \$300	7.8	8.6
\$300 to \$499	12.1	13.2
\$500 to \$699	9.7	9.2
\$700 to \$999	11.0	11.9
\$1,000 to \$1,499	17.2	17.0
\$1,500 to \$1,999	13.4	14.1
\$2,000 or more	28.7	26.0

Source: U.S. Census Bureau, 2013-2017 ACS 5-Year Estimates (B25094)

## **PUBLIC AND SUBSIDIZED HOUSING**

The HCD does not administer Public Housing within its jurisdiction. The latter is managed by another entitlement, the Public Housing & Community Development (PHCD) Department of Miami-Dade County. Nonetheless, the HCD gathers statistics on the quantity and age of public housing stock *within the City of Miami's limits*, along with some of the characteristics of that housing. Of special note is the fact that about 70% of the County's public housing stock, of 9,506 units total, is within our jurisdiction (Miami) primarily because Miami is the oldest of Miami-Dade County's 34 incorporated municipalities, established in July 1896. Due to the age of many of these buildings (average being over 40 years) and the limited capital funding available to the PHCD (presently around \$12 million annually) to make repairs and renovations, the PHCD has been steadily working for several years to rehabilitate/upgrade existing public housing units, removing and replacing those that were obsolete, and increasing the number of income-restricted units on underutilized sites with private sector partners via the Rental Assistance Demonstration (RAD) program.

Some of these renovations have taken place at sites located within the City. The RAD program allows for the conversion of a public housing subsidy platform to a Project Based Voucher subsidy platform, which is a more stable funding source. In December, 2018, PHCD submitted applications to HUD to achieve a RAD portfolio award for a total of 6,426 units, and subsequently received approval from HUD in March, 2019. As part of PHCD's Plus, an additional 6,000 to 10,000 affordable and workforce units are potentially projected for construction on top of the 6,400 units referenced. The RAD rent structure allows for increased subsidy over time compared to the public housing funding model.

The County also oversees approximately 1,955 mod-rehab units in its Section 8 program and 15,368 Section 8 vouchers (with an average of 13,800 active on a monthly basis).<sup>11</sup> Their average Housing Assistance Payment is just under \$940. The County’s Waitlists for Project Based Units and Tenant Based Units were both established in 2014.

As to City of Miami, we can only address the assisted housing we administer, which includes 158 Section 8 Housing Choice Vouchers (HCV) and 268 mod-rehab units. The latter units are in 16 privately owned buildings, located primarily in the Little Havana and Liberty City neighborhoods. The buildings’ combined inventory totals 15 studios, 215 one-bedroom units, and 38 two-bedroom units. Ten of these buildings were built on or before 1930. Due to their significant age, there are limitations as to the renovations possible at these sites, such as an inability to accommodate elevators. The age of the properties is obviously of concern to HCD, as there is already a shortage of landlords interested in taking on project-based units, given the Miami market’s high demand for rental units and escalating rental rates. The City has two separate waitlists for these programs. The City’s waitlist for HCV’s vouchers last opened for pre-applications for two days in Oct. 2014 (with a preference of Elderly or Disability) during which 4,000 persons applied. A random, computerized waitlist was established of 100 names which is still being worked through. The City’s Section 8 moderate rehabilitation program waitlist was established in 2003 and 20,000 persons applied.

In the last waitlists established for the City of Miami’s Section 8 programs, specific information on race and ethnicity was NOT requested in the application itself. As such, the City cannot provide certain demographic information on said waitlists at this time. The City has noted HUD’s expectations as to identifying particular characteristics of Section 8 applicants, and will request this type of data (ethnicity, race, etc.) when establishing future waitlists.

Table PSH-1: Public Housing Total Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-Based	Tenant-Based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of Units/ Vouchers Available	89	2,351	9,219	14,742	33	14,709	0	0	522
# of Accessible Units	-	-	10	-	-	-	-	-	-

\*includes Non-Elderly Disabled, Mainstream Five-Year, and Nursing Home Transition  
Source: PIC (PIH Information Center)

Because of the age of the public housing stock, the County estimates its redevelopment needs at approximately \$1.9 billion agency-wide. Generally, they indicate that their older stock has inherent deficiencies tied to the age of the property, noting that mechanical, electrical, and plumbing upgrades are needed, as well as security systems, building envelopes (hurricane resistance), fire safety, windows and doors.

As of 2019, 13 Public Housing redevelopment projects have been completed: Total number of units are 1,622 Units (1,222 Public Housing and 400 Non-Public Housing/Affordable). As of 2019, four (4) Public

<sup>11</sup> 5-YEAR PHA PLAN (2015-2020) Miami-Dade County, effective 10/2018

Housing development projects are under construction: total number of units are 614 Units (321 Public Housing and 293 Non-Public Housing/Affordable). As of 2019, one Public Housing Site is projected to close in next three months: total number of units is 204 Units (73 Public Housing and 131 Non-Public Housing/Affordable).

## **HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN**

The most recent City of Miami Section 8 Administrative Plan “the Plan” addresses fair housing and equal opportunity in Chapter 18 in both the HCV Program and the Moderate Rehabilitation Program as overseen by the HCD. The Plan elaborates on the protected classes including race, color, religion, ancestry, national origin, age, sex, pregnancy, disability, marital status, familial status, sexual orientation, and gender identity.

The City’s policy for requesting reasonable accommodations is set forth here as well. If an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that the PHA treat the information as a request for reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

Section 18.3 of the Plan addresses the City’s services for persons and improving access to persons with **Limited English Proficiency (LEP)**. LEP is defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. The services provided include both oral and written translation by PHA staff members (at no cost to the LEP person) who speak English, Spanish and Creole. LEP persons will be permitted to use, at their own expense, an adult interpreter of their own choosing, in place of, or as a supplement to, the free language translation services offered by the PHA. Aside from this, the City advertises in both English and Spanish newspapers (one each) whenever a Section 8 program opens for applications, and translates the application to Spanish and Creole, with copies of these available at all application pick-up sites. Although the City has no formal LEP Plan in place, it does translate as much material as possible to Spanish and Creole.

The City’s waiting list preference is for persons who are disabled and/or elderly. The City retains the right to skip higher income families on the waiting list if necessary to meet the statutory requirement that 75% of newly admitted families in any fiscal year be families who are extremely low-income as defined by HUD.

The local preference for the Section 8 programs application process is for persons/families who qualify as disabled or elderly. These preferences are defined in the Plan as follows:

Elderly family:

- A family whose head or spouse (or sole member) is 62 years or older and/or a family that includes an elderly person(s).
- Disabled family:
- A family whose member(s) include a person(s) who is under a disability as defined in Section 223 of the Social Security Act (42 U. S. c. 423) or has a developmental disability as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U. S. C. 6001(7)); or

- A family whose member(s) include a person(s) having a physical or mental impairment that (a) is expected to be of a long-continued and indefinite duration; (b) substantially impedes his or her ability to live independently; and (c) is of such nature that such ability could be improved by more suitable housing.

**WAITING LISTS FOR HCV AND THE MODERATE REHABILITATION PROGRAM**

As the PHA, the HCD opens and closes registration periods by announcing these via public notice advertised in a newspaper(s) of local general circulation and posted on the PHA’s website. The notice always includes the Fair Housing logo and slogan and is otherwise in compliance with Fair Housing requirements. The local TDD/TTY phone number is included and a dedicated phone number for persons with a disability or mobility issue was included. The most recent Housing Choice Voucher (HCV) wait list, opened in October 2014, was advertised in both English and Spanish local newspapers. The application itself was posted on the City web site *and* distributed in the City’s three main languages – English, Spanish, and Creole. Applications were made available at all City of Miami’s 13 community offices (known as the Neighborhood Enhancement Team (NET) offices), which are spread throughout the City in 11 different neighborhoods and accessible by and to all City neighborhoods. Applications were also made available at the Miami-Dade County MAIN library in downtown Miami, accessible by bus, Metrorail and vehicle.

Because the HCD operates a very small program (143 vouchers) and the program’s level of attrition is extremely low, the City (via the HCD) establishes a small waitlist; the 2014 waitlist only had 100 slots available. The City received a total of 4,091 eligible applications via U.S. mail and a random computer lottery selected 100 from that group.

The Plan includes all the guidelines set forth by HUD in its final rule on **Equal Access** to Housing in HUD Programs regardless of Sexual Orientation or Gender Identity (77FR 662) which applies to all HUD-assisted and HUD-insured housing, including the private owners who participate in housing programs funded under the U.S. Housing Act of 1937.

Table WL-1 below provides details on the demographics of the applicants during the last Section HCV Application period:

Table WL-1: Characteristics of Applicants to the City of Miami Section 8 HCV Program (2014)

<b>Total number of eligible applicants</b>	<b>4,091</b>	<b>100.0%</b>
<i>Hispanic</i>	<i>2576</i>	<i>63.0%</i>
<b>Gender</b>		
--Female	2908	71.0%
--Male	1183	29.0%
<b>Race</b>		
--African American	1647	40.3%
--American Indian	1	0.0%
--Asian	8	0.2%
--Other	19	0.5%
--White	2416	59.1%
<b>American citizen</b>		
--Yes	3288	80.0%
--No	803	20.0%

<b>Preference Identified (Elderly/Disabled)</b>		
--Yes	2097	51.0%
--No	1994	49.0%

Source: City of Miami, Dept. of Housing & Community Development

\*Note: Hispanic ethnicity is counted independently of race.

## **LOW INCOME HOUSING TAX CREDITS (LIHTC)**

The Federal Low-Income Housing Tax Credit (LIHTC) program is now the major source of federal support for affordable housing. The program provides developers with a federal income tax credit and in the case of non-profit developers, creates an incentive for private investors to participate in the construction and rehabilitation of low-income housing.

In Florida, the LIHTC program is administered by the Florida Housing Finance Corporation (FHFC), started in 1987, and overseen by a nine member board of directors. FHFC administers a tax credit application process whereby it establishes an annual “Qualified Allocation Plan” (QAP), which defines the criteria for ranking applications. As noted on the FHFC website, “Each development must set aside a minimum percentage of the total units for eligible low or very low income residents for the duration of the compliance period, which is a minimum of 30 years with the option to convert to market rates after the 14th year. At least 20 percent of the housing units must be set aside for households earning 50 percent or less of the area median income (AMI), or 40 percent of the units must be set aside for households earning 60 percent or less of the AMI.” In an analysis of the LIHTC projects within the City limits, the latter option dominates. Applicants that are requesting tax credits from Florida Housing are required to set aside for Extremely Low Income (ELI) households 10% of the total units for which they are applying.

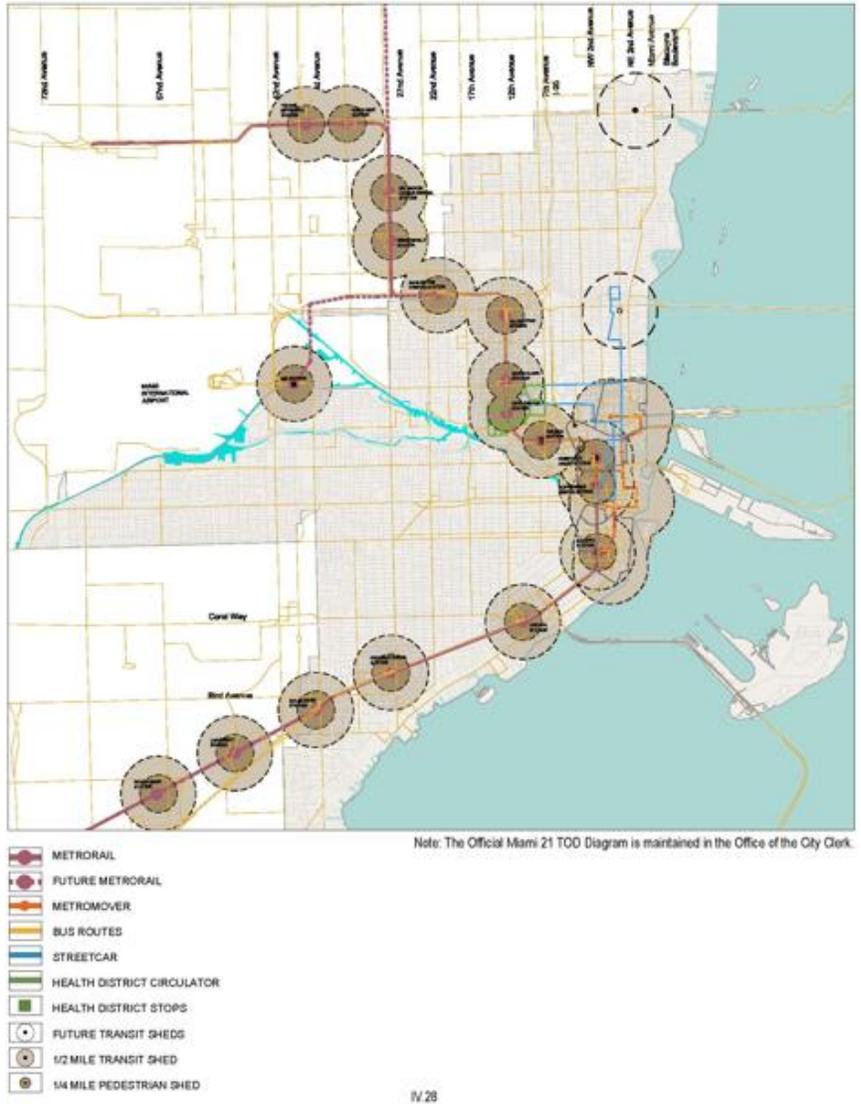
The municipalities within the state are in no way involved in the FHFC’s QAP process (or the awards process for that matter) but in a state as diverse as Florida, a recent QAP merits a closer look. During an application period, it reviews different requests for funding from private/public developers and allocates funding to those developments that score highest based on specific criteria it defines for ranking applications. State municipalities (including Miami) **do not** have a direct role in the administration of the LIHTC program, which creates a unique set of issues given that Florida’s counties are diverse and each have their own set of challenges.

To this end, we feel is crucial to address the existent transit system in Miami and Miami-Dade County, which is operated by Miami-Dade Transit (MDT), a County Department. Most importantly, the County’s grid is such that the bulk of traffic travels north-south or east-west, along several major corridors. Miami is one of 34 cities located within Miami-Dade County, Florida’s third largest county in terms of land area. Miami was settled in 1825 along the Miami River while Miami-Dade County (originally known as Dade County) was founded eleven years *later* in 1836. Because the bulk of early development in the area took place within what are now City limits, in 1844 Miami became the County seat, given that much of the County’s population at the time lived in what is present day Miami. This historical significance continues today and the City of Miami is very much considered the County’s urban core -- home to the area’s main Performing Arts Center (Arsht Center), fine art museum (Perez Art Museum Miami), its Financial District (Brickell), the area’s largest public hospital (Jackson Memorial Hospital) and more.

First opened in May 1984, the area’s Metrorail system (heavy rail metro line) opened its Green Line connecting Dadeland South (County) to Overtown (City). The Orange Line was introduced in 2012, but it

shares much of its line with the green with an additional extension to Miami International Airport. An automatic downtown people mover known as the Metromover opened in downtown Miami in early 1986 and expanded further into downtown in the mid-90s. As you'll notice in the map below, the bulk of the County's Metrorail stations are in fact, located within City of Miami limits (13 of 22) and all of the Metromover stations are in downtown Miami (City). This means that much of the mass transit in the entire County – not inclusive of rapid bus transit aside – has hubs within City of Miami limits. This fact leads us to the TOD bonus included in recent QAPs issued by the FHFC.

Map LIHTC-1: Metrorail System



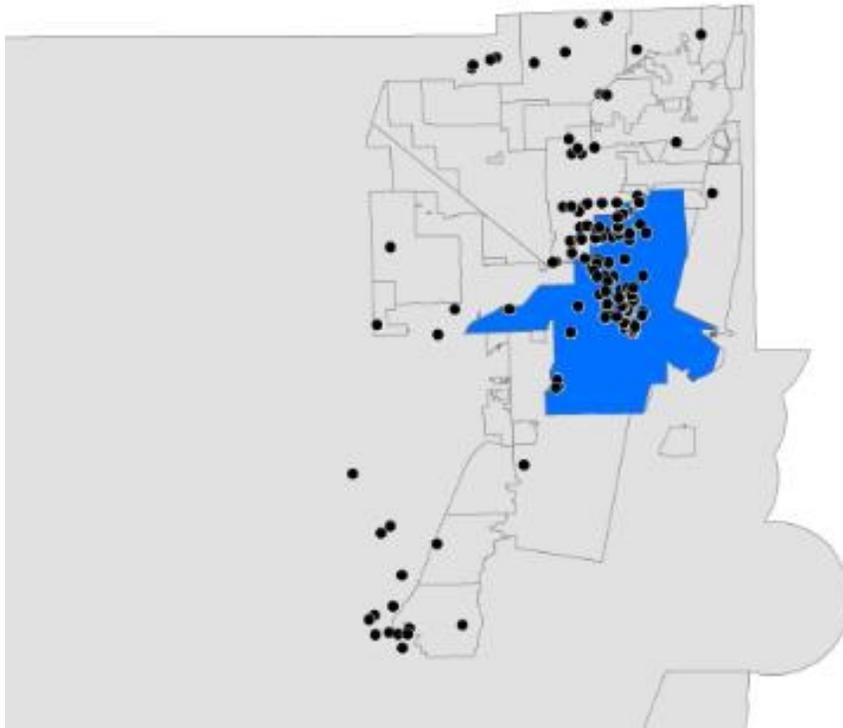
## **LIHTC INVENTORY**

In order to have an accurate inventory of tax credit units located within City limits, the City requested a master listing of funded projects from the Florida Finance Housing Corporation (FHFC), who manages the tax credit program for the State of Florida. An analysis of the projects located within City limits found that

the City's total LIHTC project count sits at 95. Please note, that some of the assisted developments are RAD (public housing) projects.

To be clear, Miami-Dade County is comprised of multiple communities - all concentrated on the county's Eastern half, including 34 municipalities (including the City of Miami) and 16 unincorporated communities. See the Figure below for an illustration of where the tax credits projects are located in Miami-Dade County. As you'll note, the bulk are in the South Miami-Dade area or the northeastern part of the County. For reference purposes, the royal blue image encompasses the City of Miami's limits, whereas all the surrounding grey is the rest of Miami-Dade County. In the County, a total of 157 projects have been funded and are still in the program, leaving a total County count of 63 tax credit developments. This means that approximately **94** of the tax credit projects in all of Miami-Dade County are in fact located within the City of Miami. For reference purposes, it should be noted that the City of Miami is 35.68 sq. miles (land) and Miami-Dade County is 1,898 square miles (land).

### City of Miami - Low Income Housing Tax Credit



Data Source: Shimberg Center University of Florida 2019

### RENTS

The Fair Market Rents in Miami-Dade County are noted below. A recent analysis prepared by the National Low Income Housing Coalition (NLIHC), *Out of Reach 2019*, concentrated on dissecting FMRs and housing costs in MSAs across the nation, which led to some startling findings in our area. The report indicated that the hourly wage needed to afford a two-bedroom unit in the Miami-Miami Beach-Kendall HUD Metro

FMR Area based a rent amount of \$1,454 was \$27.96<sup>12</sup>. If this formula is adjusted to today's figures, with an updated FY2020 FMR for a two-bedroom unit of \$1,625 in Miami, a household must earn approximately \$5,416 monthly or \$64,992 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into an hourly housing wage of \$31.25. As per the report, this would require at least 2.7 full-time jobs at minimum wage. However, the estimated hourly wage in for City of Miami residents is \$19.39.

Table HM-3: Fair Market Rents

<i>Miami/Miami Beach/Kendall HUD Metro FMR Areas for all bedroom sizes</i>					
	Studio	1-bedroom	2-bedroom	3-bedroom	4-bedroom
2019	\$951	\$1,147	\$1,454	\$1,934	\$2,354
2020	\$1,084	\$1,285	\$1,625	\$2,164	\$2,621

Source: [www.huduser.org](http://www.huduser.org)

Utilizing 2019 FMRs, the HCD ran a brief analysis to try and pinpoint the affordability gap in our marketplace based on unit sizes, and assuming \$40,327 as the median household income. The graph below shows the gap in multiple categories including Fair Market Rents (FMR) and HOME assisted units.

Table HM-4: Rental Affordability Gap by Unit Size, City of Miami

<b>Assumptions based on Median HH Income in the City of Miami</b>			
<b>City of Miami Median HH Income</b>			\$ 40,327
<b>30% of Median HH Income divided by 12 Months</b>			\$1,008
	Unit Size	Monthly Rent (\$)	Affordability Gap
<b>City of Miami Median Gross Rent (2013-2017)</b>	-	\$1,056	(\$48)
<b>Fair Market Rent, FY 2019</b>	0 Bedroom	951	-
	1 Bedroom	1,147	(\$139)
	2 Bedroom	1,454	(\$446)
	3 Bedroom	1,934	(\$926)
	4 Bedroom	2,354	(\$1,346)
<b>High HOME Rent</b>	0 Bedroom	944	-
	1 Bedroom	1,013	(\$5)
	2 Bedroom	1,217	(\$209)
	3 Bedroom	1,398	(\$390)
	4 Bedroom	1,540	(\$532)
<b>Low HOME Rent</b>	0 Bedroom	741	-
	1 Bedroom	794	-

<sup>12</sup> <http://nlihc.org/oor>

2 Bedroom	953	-
3 Bedroom	1,101	(\$93)
4 Bedroom	1,228	(\$220)

Sources: City Gross rent and Median Household Income, US Census Bureau American Community Survey; Fair Market Rent, US HUD; High/Low HOME Rent, Miami Dade Affordable Rental from Tax Credit Developers, Reinhold P Wolff Economic Research.

## Cost Burden in Miami

Cost-burdened households are defined as those spending more than 30 percent of their household incomes on housing costs, including utilities.

Table CB-1: Percent of Cost-Burdened Renter Households

<b>Total Number of Renter Households</b>	108,612	(x)	
<b>Paying on Rent:</b>	<b># of Households</b>	<b>% of Households</b>	
Less than 15 percent of Income	6,210	5.7%	Not Cost-Burdened
15-19.9 percent of Income	7,027	6.5%	
20-24.9 percent of Income	9,675	8.9%	
25-29.9 percent of Income	11,015	10.1%	
<b>30-49.9 percent of Income (Cost-Burdened)</b>	<b>29,750</b>	<b>27.4%</b>	Cost-Burdened
<b>35 percent or more of Income (Severely Cost-Burdened)</b>	<b>38,480</b>	<b>35.4%</b>	
Not computed	6,455	5.9%	
<b>Cost-Burdened</b>	<b>68,230</b>	<b>62.8%</b>	

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (B25070)

Table CB-2: Percent of Cost-Burdened Home Owner Households

<b>Total Number of Owner Households</b>	48,735	(x)	
<b>Paying on Mortgage or Without a Mortgage:</b>	<b># of Households</b>	<b>% of Households</b>	
Less than 15 percent of Income	13,000	26.7%	Not Cost-Burdened
15-19.9 percent of Income	5,549	11.4%	
20-24.9 percent of Income	5,000	10.3%	
25-29.9 percent of Income	4,335	8.9%	
<b>30-49.9 percent of Income (Cost-Burdened)</b>	<b>8,385</b>	<b>17.2%</b>	Cost-Burdened
<b>35 percent or more of Income (Severely Cost-Burdened)</b>	<b>11,260</b>	<b>23.1%</b>	
Not computed	1,206	2.5%	
<b>Cost-Burdened</b>	<b>19,645</b>	<b>40.3%</b>	

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (B25091)

Research indicates that cost-burdened households must cut back on other expenses including food, healthcare, childcare and transportation. Cost burdened households also have an inability to save for the future, leaving them with a tentative foothold on household stability in the event of an unexpected setback, i.e. lay-off, injury, health issue, etc. **As such, housing cost burden is the most common housing problem in the City across incomes, tenure, race and ethnicity.** We will address both cost-burdened and severely cost-burdened households in this section.

- Cost-burdened households: are defined as those spending 30.01 percent to 50 percent of their household incomes on housing costs, including utilities.
- Severely Cost-burdened households: As per HUD, Households spending more than 50 percent are considered to be "severely cost-burdened." Of the City's 55 percent of cost-burdened households, more than half (31 percent) meet the definition being severely cost-burdened. Also, as one would suspect, households with the lowest income brackets (0 to 30% AMI) are the most cost-burdened. It is important to note that yet again, a significant majority (62.8%) of the severely cost-burdened households in the City are renters.

Table CB-3: Housing Cost Burden – Owners & Renters

Race or Ethnicity	<=30% of Income toward Housing Cost (Not Cost-Burdened)	30-50% of Income toward Housing Cost (Cost-Burdened)	>50% of Income toward Housing Cost (Severely Cost-Burdened)	Cost-Burdened Not Available	Total
<b>Jurisdiction as a whole</b>	<b>66,430</b> 42%	<b>37,060</b> 24%	<b>48,435</b> 31%	<b>5,409</b> (x)	<b>157,334</b> (x)
<b>White</b>	13,475 57%	4,395 19%	5,015 21%	770 (x)	<b>23,655</b> (x)
<b>Black/African American</b>	8,665 38%	5,330 23%	7,185 31%	1,665 (x)	<b>22,845</b> (x)
<b>Asian</b>	980 58%	385 23%	270 16%	65 (x)	<b>1,700</b> (x)
<b>American Indian, Alaska Native</b>	105 54%	45 23%	30 15%	15 (x)	<b>195</b> (x)
<b>Pacific Islander</b>	0 0%	0 0%	0 0%	0 (x)	<b>0</b> (x)
<b>Hispanic</b>	42,660 41%	26,640 25%	35,745 34%	2,840 (x)	<b>105,045</b> (x)
<b>Other Non-Hispanic</b>	0 0%	<b>250</b> <b>51%</b>	190 38%	54 (x)	<b>494</b> (x)

Source: 2011-2015 CHAS

With 55.8 percent cost-burdened households, the City of Miami is one of the most unaffordable cities in the nation. The City's share of cost-burdened renters as a proportion of all households is 1.8 times the national average. In fact, more Miamians living in larger households may be masking the true scale of the problem.

The City of Miami's high rate of cost-burdened households has become a near permanent feature of the local economy. Since 2000, the percentage of cost-burdened households in the City has consistently run

at 1.5 times the national average. The most significant difference between Miami and the rest of the nation has been the rate of growth in cost-burdened renter households since 2000. At the national level, cost-burdened renter households grew from 14.3 to 17.5 percent of all households from 2000 to 2015. In Miami, rather than peaking and receding, the composition of cost-burdened renter households has been steadily growing without interruption since 2000, increasing from 41.8 percent of all households (*owner and renter* households) in the City to its current peak of 55.8 percent of all households.

Table CB-4: Percent of Cost-Burdened Households

	Total Households	Cost-Burdened Households
<b>Renter Households</b>	108,612	68,230
<b>Home Owner Households</b>	48,735	19,645
<b>Total Households</b>	<b>157,347</b>	<b>87,875</b>
<b>Total % of Households that are cost-burdened</b>		<b>55.8%</b>

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates – Derived from Table B25091

Forecasting a significant decline in the City’s cost-burden rate *without aggressive intervention* is probably unrealistic, for three reasons. First, the dynamics driving housing affordability in the City of Miami have been moving in the wrong direction — housing prices and rents increasing faster than wages, slow higher-wage job creation or absorption, tightening vacancy rates, and increasing speculative investment that permanently removes more units each year from the local market.

Second, increasing household size may be suppressing the City’s cost-burden rate. The small increase in median household incomes at the middle of Miami’s income ladder may simply be that more people are living together. The fastest way to increase total household income is to add a roommate, even if they are employed part-time or move in with other family members.

Lastly, the City’s upward housing price trends typically move much faster than wages and income. Historically, housing prices and rents in the City have demonstrated considerable rates of increase over short time periods. Conversely, the City would need to undergo a monumental change in its industrial and occupational structure in order to create higher wage jobs and significantly impact its affordability indicators (affordable housing cost and income gaps). Historically, the City of Miami’s and Miami-Dade County’s economy have shown they can shed high-wage jobs very quickly, but struggle in adding new high-skill, high-paying jobs. The City has historically not had many large scale employers (100+ employees) either, and the bulk of its businesses (68%) feature four employees or less (source: Miami-Dade Beacon Council).

**The Miami area has one of the most cost-burdened middle-income households in the nation**

Although the numbers clearly show that Miami’s poorest residents are severely cost-burdened, there is growing evidence that the middle class is also being squeezed. According to a report from the Joint Center of Housing Studies of Harvard University “*The State of the Nation’s Housing 2018*,” which evaluated the 100 largest U.S. metropolitan areas for middle class cost-burden, the Miami metropolitan area ranked as the thirteenth metropolitan area in this category with 38.6 percent of middle-class households in the \$45,000 to \$74,999 income range and 66.1 percent in the \$30,000 to \$44,999 income range being cost-burdened. Housing costs outpace income growth in the area due in part to foreign investment and rapid population growth.

## **HOME BUYER AFFORDABILITY FOR SPECIAL NEEDS POPULATION**

Several mechanisms have been in place for about a decade, both on a local and state level, to make additional affordable housing options available to special needs populations. Applicants that are requesting tax credits from Florida Housing are required to set aside 10% of the total units for which they are applying for Extremely Low Income (ELI) households. Starting in 2009, Florida Housing began requiring Applicants commit to reserving 50% of their ELI units for special needs households, defined as households consisting of homeless families, survivors of domestic violence, persons with a disability, or youth aging out of foster care – through a process called the LINK initiative. Referral Agencies throughout Florida serve as coordinators to assist special needs households with supportive services. Meanwhile, the tax credit developer and referral agency create a Memorandum of Understanding (MOU) which is a component of Final Credit Underwriting Report. The Referral Agency creates and implements a referral system to produce a waiting list of eligible prospective tenants when units are completed. In Miami, there are two agencies serving this purpose and for the purpose of this AI. Based on data provided to us by the Florida Housing Finance Corp. As of January 2020, there were 427 units in Miami-Dade under the LINK Program; 210 of these units were located in the City of Miami.

The City utilizes its allocation of State Housing Initiative Partnership (SHIP) funds for strategies including (but not limited to) single-family rehabilitation assistance, emergency home repair assistance, the single-family replacement home program, and/or the SHIP Homebuyers Financing Program. Starting in FY 13-14, the State required that 20% of any SHIP allocation it made to an entitlement be utilized towards a special needs household.

In its most recent Local Housing Assistance Plan (LHAP) filed by the HCD with the State of Florida, persons who have special housing needs are defined as “individuals who have incomes not exceeding moderate-income and because of particular social, economic, or health related circumstances, have a greater difficulty acquiring or maintaining affordable housing,” as stipulated in Chapter 67-37.002 (21), F.A.C. (page 8). In all cases, the persons being assisted must be very low, low or moderate income with the latter not exceeding 120% AMI as delineated by the State of Florida every year.

In Fl. Statutes 420.0004 “persons with special needs” means an adult person requiring independent living services in order to maintain housing or develop independent living skills and who has a disabling condition; a young adult formerly in foster care . . . ; a survivor of domestic violence as defined in the statutes; or a person receiving benefits under the Social Security Disability Insurance (SSDI) program or the Supplemental Security Income (SSI) program or from veterans’ disability benefits.

## **Economic Trends**

The City of Miami’s economic indicators are mixed -- one area of concern is the wide disparities between race and ethnic groups. According to the Table ET-1 below, The Black/African American population has the lowest median household income in the City of Miami and it is also the Race group that has experienced the least increase in median household income in the past 4 years (+\$2,114). The Hispanic/Latino population also did not fare much better either since it reported the second lowest median household income with small increases in comparison to Asians who had an average increase of \$22,717 in just the past 4 years. This increase is more than the median household income of the Black/African American population.

Table ET-1: Median Household Income by Race, City of Miami

Race / Ethnicity	Estimate Inflation Adjusted Dollars (2013)	Estimate Inflation Adjusted Dollars (2017)	Change
White alone (Not Hispanic or Latino)	\$66,210	\$82,196	+\$15,986
Black or African American alone	\$20,436	\$22,550	+\$2,114
Asian alone	\$55,833	\$78,550	+\$22,717
Some other race alone householder	\$34,422	\$35,532	+\$1,110
Two or more races	\$37,266	\$45,294	+\$8,028
Hispanic or Latino Householder (of any race)	\$27,873	\$31,596	+\$3,723

Source: U.S. Census Bureau, 2009-2013 ACS 5-Year Estimates vs. 2013-2017 ACS, 5-Year Estimates (B19013)

Income and employment are two essential characteristics that impact a household’s sustainability and economic growth.

## INCOME

The **median household income** in Miami is \$40,327 while Miami-Dade County’s is \$49,930. Historically, this is usually the case – with the County’s median income averaging significantly higher than the City’s median income. When further analyzing Miami’s household income brackets (see Table HI-2 below), it’s easy to discern that the bulk of the renter-occupied units in the City correlate to the lower income brackets. In fact, just under 60% of the renter-occupied units are occupied by households making \$34,999 and below.

Table HI-1: Household Income: City of Miami vs Miami-Dade County

	City of Miami	Miami-Dade County
<b>Median Household Income</b>	\$40,327	\$49,930
<b>Per Capita Income</b>	\$27,250	\$25,996
<b>Persons in Poverty, Percent*</b>	<b>25.8%</b>	<b>19.0%</b>

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates (B19013, B19301)

\* U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

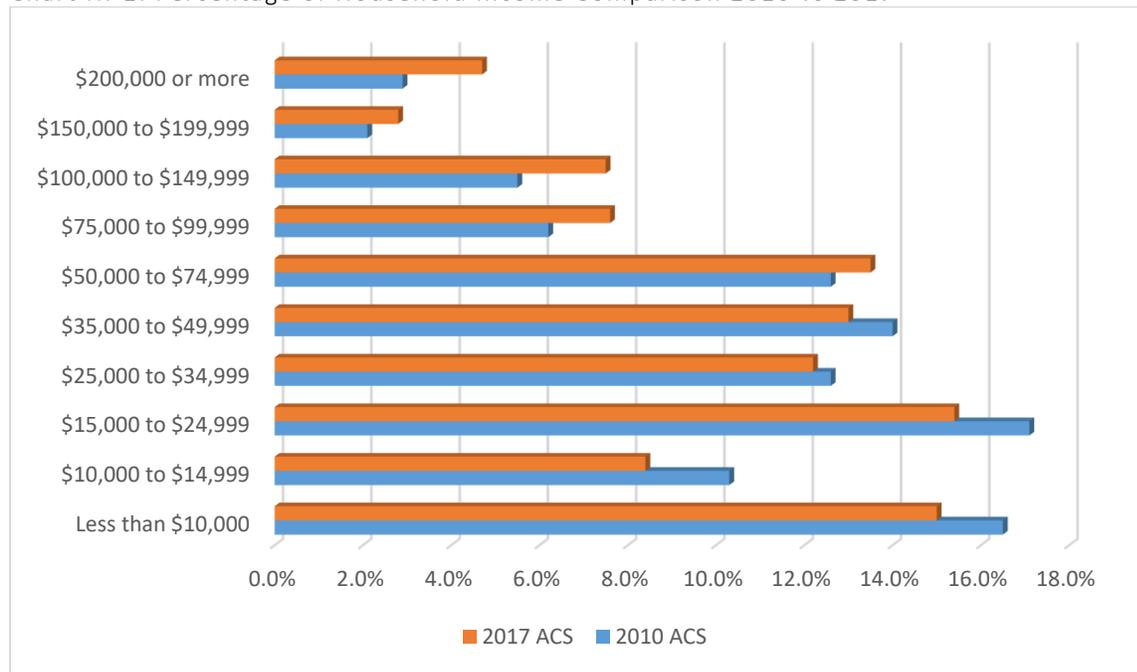
Table HI-2: Percentage of Household Income in the Past 12 Months (In 2017 Adjusted \$)

Subject	Occupied Housing Units	Owner-Occupied Housing Units	Renter-Occupied Housing Units
Occupied Housing Units	164,734	49,823	114,911
<b>Income Brackets</b>	<b>Percent</b>	<b>Percent</b>	<b>Percent</b>
Less Than \$14,999	23.4	13.1	27.9
\$15,000 to \$24,999	15.4	11.7	17.0
\$25,000 to \$34,999	12.2	10.2	13.0
\$35,000 to \$49,999	13.0	10.5	14.0
\$50,000 to \$74,999	13.5	14.9	12.8
\$75,000 to \$99,999	7.6	11.3	6.1
\$100,000 to \$149,999	7.5	12.7	5.2
\$150,000 or more	7.5	15.5	4.1

Source: U.S. Census Bureau, 2017 American Community Survey 5-Year Estimates (S2503)

When looking at how City incomes have changed within the past decade or so, specifically when comparing the 2010 ACS to that of the 2017 ACS, 5-Year Estimates, the data further reveals that the City of Miami is a city in flux, whose housing demands are changing in real time. The City’s household wealth is also changing. According to this data, the City’s share of household earnings less than \$10,000 fell from 26.5% to 15.0%. In fact, during this same period, the share of every low-income category fell while the share of higher income households rose. It is important to understand that these figures do not say that the city lost residents in low-income categories as much as they reveal that the landscape of the city continues to evolve, quite possibly, adding more households to the higher income brackets, and, thereby changing the share of households in these income categories.

Chart HI-1: Percentage of Household Income Comparison 2010 vs 2017



Source: U.S. Census Bureau, 2010 & 2017 American Community Survey 5-Year Estimates (S1901)

## **LABOR FORCE**

The economic well-being of a community is largely determined by how well the residents are connected to the labor market. Currently, 61.8 percent of the population 16 years and over is in the labor force. Table LB-1 below shows that about 5 percent of the City’s workforce population is unemployed. However, according to the Florida Department of Economic Opportunity’s Local Area Unemployment Statistics’ Local Area Unemployment Statistics (LAUS) data, in December 2017 the State of Florida had a 3.8 percent unemployment rate; a 4.3 percent was the unemployment rate determined for the Miami, Kendall, and Miami Beach Metropolitan Divisions. Please note that the data is not available solely for the City of Miami, the city is included in this larger metropolitan division.

Table LB-1: Labor Force

	Number	Percent
<i>Population 16 years and over</i>	371,805	100.0
<i>In Labor Force (16 Years and older)</i>	229,792	61.8
<i>Civilian Labor Force</i>	229,640	56.8
<i>Employed</i>	211,126	56.8
<i>Unemployed</i>	18,514	5.0
<i>Not in Labor Force</i>	142,013	38.2

Source: 2013-2017 ACS, 5-Year Estimates (DP03)

## **WORK**

Labor force issues, industry challenges, and opportunities are important to understand together. It is essential to have a perspective about the industries and occupations in which the majority of a city’s residents have found employment. Employment and income are directly correlated to economic sustainability and therefore also impact access to home ownership. It is important to note that more than 50% of Miami’s employed civilians 16 years and over hold service and sales occupations. The bulk of individuals employed are in low end jobs mostly related to the service industry sector.

Table WK-1: Industry by Occupation for the Civilian Employed Population 16 Years and Over

	Number	Percent
<i>Civilian employed population 15 years and over</i>	211,126	100.0
<i>Agriculture, forestry, fishing and hunting, and mining</i>	784	0.4
<i>Construction</i>	20,661	9.8
<i>Manufacturing</i>	8,012	3.8
<i>Wholesale Trade</i>	6,958	3.3
<i>Retail Trade</i>	23,560	11.2
<i>Transportation and warehousing and utilities</i>	14,075	6.7
<i>Information</i>	3,976	1.9
<i>Finance and insurance, and real estate and rental</i>	16,501	7.8
<i>Professional scientific, and management, and administrative and waste management services</i>	29,019	13.7
<i>Educational services, and health care and social assistance</i>	34,148	16.2
<i>Arts, entertainment, and recreation, and accommodation and food services</i>	32,056	15.2
<i>Other services, except public administration</i>	16,037	7.6
<i>Public Administration</i>	5,339	2.5

Source: 2013-2017 ACS, 5-Year Estimates (S2405)

# LEGAL STATUS EVALUATION

## Evaluation of Current Fair Housing Legal Status

The Department of Housing and Community Development is actively engaged in promoting fair housing for City of Miami residents through the monitoring of fair housing complaints and promoting and securing compliance with fair housing regulations. The City's fair housing program is designed to affirmatively further fair housing objectives of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, as amended, and other relevant federal, state, and local fair housing laws.

The last three years, the City has publically acknowledged its commitment to Fair Housing during the month of April, issuing Proclamations recognizing the important for affirmatively furthering fair housing and acknowledging Housing Opportunities for Excellence, Inc. (HOPE, Inc.) for its commitment.

The City retains the private, not-for-profit Housing Opportunities Project for Excellence, Inc. (HOPE, Inc.) to carry out trainings, workshops, and monitoring fair housing activities, specifically with the execution of a testing component. The provision of fair housing services is eligible as either a program administration cost, per 24 CFR 570.206, or as a public service, per 24 CFR 570.201(e). HOPE, Inc. is a private fair housing not-for-profit organization dedicated to eliminating housing discrimination and promoting fair housing in South Florida. HOPE, Inc. employs a three-tiered system of private enforcement, education outreach, and counseling to achieve its mission to affirmatively further fair housing. Its programs are designed to ensure that residents, including those living in the City of Miami, are offered the right to select housing of their choice without discrimination based on race, religion, color, national origin, sex, disability, marital or familial status, or such other protected classes as may be conferred by federal, state, or local laws.

### **FAIR HOUSING COMPLAINTS**

As a local FHIP, the private, not-for-profit Housing Opportunities Project for Excellence, Inc. (HOPE, Inc.), documents calls, e-mails, and takes in-person requests from persons throughout Miami-Dade County and its municipalities, that allege housing discrimination based on one of the protected classes. HOPE, Inc. accepts and processes fair housing inquiries and complaints from City residents providing said data in annual intake reports. HOPE, Inc. provides these public reports to us noting the complainant's zip code -- not their exact address, in order to protect the anonymity of the complainant. We should note that some City zip codes do overlap with other jurisdictions so there is a possibility that some of the data we are attributing to persons in one of our City zip codes, might in fact fall within a neighboring community. Nonetheless, analyzing HOPE Inc.'s data allows the City's HCD to better understand any trends or concentrations of discrimination allegations/complaints within our boundaries. This allows us to better focus our fair housing information efforts in particular areas. As a disclaimer, we should also clarify that because an inquiry is filed, it does not mean that a discriminatory act occurred or that it was taken to court.

Looking at the category of inquiries on any given year, the overwhelming majority of the cases fall under Landlord/Tenant Issues. The assumption that discrimination did or did not take place should not be made. The second largest number of inquiries falls under Public Housing Assistance complaints. The table does show, however, a declining trend on the number of complaints received in all categories.

**Table LS-1: Basis of Complaint**

<i>Protected Class / Complaint</i>	<i>4/1/2016- 3/31/2017</i>	<i>10/1/2017- 9/30/2018</i>	<i>10/1/2018- 9/30/2019</i>
<i>Disability</i>	3	1	-
<i>Disability (Emotional Support Animal)</i>	3	-	2
<i>Disability (Reasonable Accommodation)</i>	1	2	-
<i>Familial Status</i>	3	-	-
<i>National Origin</i>	3	-	-
<i>Marital Status</i>	1	-	-
<i>Race</i>	4	7	2
<i>Sexual Orientation</i>	2	1	-
<i>Source of Income</i>	-	3	1
<i>Religion</i>	2	-	-
<i>Other</i>	14	6	2
<i>Rental (Landlord/Tenant Issues)</i>	52	43	11
<i>Public Assistance (Housing)</i>	19	20	7
<i>Financial Assistance</i>	7	2	-
<i>Homeowner Association</i>	1	3	1
<i>First Time Homebuyer</i>	6	2	-
<i>Foreclosure</i>	1	1	1
<i>Homeless</i>	10	4	1
<b>Total</b>	<b>133</b>	<b>95</b>	<b>28</b>

Data provided by HOPE, Inc.

## **NATIONAL TRENDS**

According to the National Fair Housing Alliance’s (NFHA) 2018 Fair Housing Trends report, “Making Every Neighborhood a Place of Opportunity,” fair housing complaints (amounting to 29,031 filed in 2017, nationwide) have remained relatively steady compared to recent years. HUD estimates that the number of reported complaints represents less than one percent of the four million instances of housing discrimination that occur each year. The highest count of complaints reported in 2017 were disability related (56.7 percent), followed by 18.5 percent of complaints reported that were race-related. This was followed by familial status as the third most frequent basis for discrimination, with 2,675 cases (or 9.3 percent of all cases of housing discrimination). The fourth most frequent basis of discrimination was national origin, with 1,951 reported cases (or 6.8 percent of all complaints), and the fifth most frequent basis was sex, with 6.7 percent, or 1,917 complaints. Color was a basis of discrimination for 422 complaints (1.5 percent), and religion was the basis of 383 complaints, or 1.3 percent of all complaints nationwide.

Housing discrimination occurs most often in the rental market, and the complaints reported in 2017 were overwhelmingly rental-related complaints. The prevalence of discrimination in the rental market over other types of transactions is because it is the most common and frequent type of housing transaction and also because it is easier to detect discrimination due to the simplicity of the transaction itself. Testing for rental discrimination is far more straightforward than testing for a real estate sales or mortgage lending case, for example. In 2017, there were 17,981 complaints reported by private fair housing organizations. This is consistent with the number in the past few years but represents 87.4 percent of all transactions types, down from 91.4 percent last year and in 2015.

## Compliance

The following section provides information outlining the actions taken since the last AI to address the fair housing complaints identified in the City of Miami.

### **EDUCATION, OUTREACH, AND MONITORING**

The City of Miami continuously works throughout the year to implement the Affirmative Fair Housing Marketing Plan via seminars to multiple segments of the community, in conjunction with general outreach via the city’s cable TV and radio operations and departmental activities. In addition, the city distributes free fair housing material at different city locations and at city sponsored events relevant to affordable housing.

In addition, HOPE, Inc. conducts its own fair housing educational workshops within the County and City, also educating community based organizations, disability advocacy agency staff and clientele, and local housing industry professionals. These seminars provided attendees with key information regarding fair housing laws and how to seek redress of grievances related to housing discrimination, issues regarding reasonable accommodations, dwelling unit modifications for the disabled, housing opportunities for people with AIDS, and compliance with fair housing laws that protect against housing discrimination due to race, color, religion, national origin, sex, disability, familial status, age, marital status, or sexual orientation. Please refer to Table EOM-1 below for a complete listing of workshops. Specialized workshops for housing providers, including Community & Economic Development Block Grants (CDBG)/Home Investment Partnerships Program (HOME) funded Community & Economic Development Corporations (CDCs), and Community & Economic Development Housing Organizations (CHDOs), have also been provided through HOPE, Inc.

It should be noted that fair housing marketing materials (in English and Spanish) are available at all of the city’s NET offices, which are located in all five city commission districts and accessible to city residents.

Table EOM-1: Fair Housing Education and Outreach Activities FY2018-2019

<i>Date</i>	<i>Description</i>	<i>Location</i>	<i># Attendees</i>
10/27/2018	Fair Housing Workshop (Creole)	Haitian American CDC	10
10/27/2018	Fair Housing Workshop (Spanish)	Cuban American National Council	5
12/15/2018	Fair Housing Workshop (Spanish)	Cuban American National Council	4
12/15/218	Fair Housing Workshop (English)	Neighborhood Housing Services	17
1/26/2019	Fair Housing Workshop (Spanish)	Cuban American National Council	6
2/9/2019	Fair Housing Workshop (Spanish)	Neighborhood Housing Services	43
2/16/2019	Fair Housing Workshop (English)	Neighborhood Housing Services	21
2/23/2019	Homebuyer’s Workshop (Spanish)	Cuban American National Council	26
3/16/2019	Homebuyer’s Workshop (English)	Neighborhood Housing Services	29
3/23/2019	Fair Housing Workshop (Spanish)	Cuban American National Council	25
4/5/2019	HOPE, Inc. 26 <sup>th</sup> Annual Miami-Dade County Fair Housing Month Celebration	Double Tree Biscayne Bay	93
4/26/2019	Homebuyer’s Workshop (Creole)	Haitian American CDC	16
4/27/2019	Fair Housing Workshop (Spanish)	Cuban American National Council	12

7/20/2019	Fair Housing Workshop (Spanish)	Cuban American National Council	6
7/27/2019	Fair Housing Workshop (English)	Neighborhood Housing Services	21
8/24/2019	Fair Housing Workshop (Spanish)	Cuban American National Council	12
9/14/2019	Fair Housing Workshop (Spanish)	Neighborhood Housing Services	37
9/21/2019	Fair Housing Workshop (Spanish)	Cuban American National Council	14

Source: HOPE, Inc.

## **DISCRIMINATION SUITS FILED**

HOPE, Inc. also conducts independent testing of advertised rental or sales properties to determine whether landlords, realtors or sellers comply with their responsibilities under the Fair Housing Act. Upon consulting with HOPE, the following case(s) were identified that have been litigated in the City of Miami or that are of interest to the City of Miami since the last AI. Below is a brief description of these:

1. Royal House Apartments *May 2019* – HOPE, Inc. joined a family in a federal housing lawsuit against the owner of Royal House Apartments located at 4410 W. Flagler St for discriminating against families with children. Once aware that the couple became pregnant, the property manager advised them that there were no available apartments to lease when their current lease expired, including the unit they were occupying under the excuse that the owner wanted to renovate the facility, a process that would only take 3 days. The family asked to stay in a hotel during the renovation period, but they were denied their request. After receiving the complaint, HOPE Inc. sent multiple testers who found out discriminatory practices against families with children.
2. In *March 2018*, the National Fair Housing Alliance (NFHA), Fair Housing Council of Greater San Antonio (FHCGSA), Fair Housing Justice Center of New York (FHJC), and Housing Opportunities Project for Excellence, Inc. collectively “Fair Housing Groups”, settled a lawsuit against Facebook that alleged that Facebook’s advertisement platform enabled landlords and real estate brokers to exclude people of color, families with children, women, people with disabilities and other protected groups from receiving housing ads. The Fair Housing Group conducted investigations that confirmed Facebook’s alleged discriminatory practices. As part of the settlement agreement, Facebook will work with NFHA to develop an in-house fair housing training program for Facebook leadership and staff. Furthermore, Facebook will work with the Fair Housing Group to support programs that expand fair housing opportunities throughout the country.
3. In *March and October 2017*, two separate individuals filed lawsuits alleging the miamigov.com website was not accessible to persons with hearing disabilities and visual disabilities, respectively. The City migrated to a new web platform in 2019 that accommodates disabilities.
4. In *Dec. 2013* and *mid-2014*, the City of Miami filed separate lawsuits in Florida federal court claiming that Bank of America, JP Morgan Chase, Wells Fargo and Citigroup violated the 1968 Fair Housing Act by targeting minority communities with high-interest loans (predatory lending) dating back to 2004, thereby creating a foreclosure crisis that decreased tax revenues and increasing the need for municipal services. These lawsuits were dismissed in 2014 in a decision that later was overturned by the US Court of Appeals for the 11<sup>th</sup> Circuit and on May 2017, by a vote of 5-3, the US Supreme Court stated that the City has standing to proceed to sue Wells Fargo

over charges that predatory lending in minority communities damaged the city and its homeowners. In January 2020, the City of Miami voluntarily dropped these fair housing lawsuits.

# CURRENT PROGRAMS

## A BRIEF SUMMARY OF CURRENT PROGRAMS AND ACTIVITIES TO AFFIRMATIVELY FURTHER FAIR HOUSING IN THE CITY OF MIAMI

This chapter briefly summarizes the current programs and activities carried out by the City of Miami. Both federal and non-federal programs are included in the assessment. The activities cited in this chapter were identified in the FY2019-2020 Action Plan and are currently underway. In addition to the programs and activities, this chapter will also state the City's Affirmative Fair Housing policies pursuant to HUD regulations, 24 CFR 92.351 and consistent with Davis-Bacon and Section 3 protocols. Specifically, the City of Miami has adopted affirmative marketing procedures and requirements for rental and homebuyer projects containing five or more HOME/CDBG-assisted housing units.

## Programs

### FEDERALLY FUNDED PROGRAMS

**Community Development Block Grant (CDBG):** As an entitlement City, Miami receives an annual CDBG grant on a formula basis. The formula takes into account total population, overcrowding, and poverty. CDBG funds must be used for activities that benefit low- and moderate-income persons. Eligible activities include affordable housing, public service, and economic development activities.

The City (via the HCD) allocates most of its CDBG grant funding on a competitive basis, making funds available to non-profit agencies via a Request for Proposal (RFP) process held every two years. Priorities for these funds are established at annual public hearings, held in the City of Miami. Different districts have different priorities and workshops are held to address any questions related to the RFP. All RFPs submitted are reviewed and scored and the HCD makes funding recommendations to the City of Miami Commission.

The City updates (as needed) its *CDBG Policies and Procedures Manual* for all sub-recipients which is made available to them at the beginning and during the fiscal year. In the manual, the City details the different Civil Rights and Fair Housing requirements that all sub-recipients are bound to, including Title VI of the Civil Rights Act of 1964, the Fair Housing Act (Title VIII of the Civil Rights Act of 1968, Executive Order 11063/amended by 12259, and Section 104(b) and 109 of Title I of the Housing and Community Development Act of 1974. The manual (page 24-25) also addresses the requirements of Section 3 of the Housing and Community Development Act of 1968, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA) of 1990, and the Age Discrimination Act of 1975 (as amended).

**Home Investment Partnerships Program (HOME):** The purpose of the HOME Program is to increase the supply of safe, decent, sanitary, and affordable housing for low and very-low-income households. HOME also seeks to expand the capacity of nonprofit housing providers through CHDOs. Jurisdictions can use HOME funds to carry out a wide variety of housing activities for low- and very low-income families, including:

- Homebuyer programs, which may include down payment and closing costs assistance, construction loans, rehabilitation, or new construction or soft cost pre-development.
- Rental housing programs, consisting of construction loans, permanent mortgage loans, bridge loans, or loan guarantees for acquisition, rehabilitation, new construction, and refinancing.

- Homeowner rehabilitation programs, including grants, loans, interest subsidies, and loan guarantees to pay for hard costs, related soft costs, and refinancing expenses.

The City (via the HCD) also issues Requests for Proposals (RFP) for its HOME program based on funding availability and recommends RFPs based on a competitive basis. In each HOME proposal issued, the HCD addresses any priority housing needs the City may have based on its current Consolidated Plan. The HCD issued its last RFP in February 2019, a Request for Proposals for the construction/rehabilitation and permanent financing for multifamily rental development and multifamily and single family homeownership projects. The intent of the RFP was to make HCD aware of all of the potential housing developments planned in different areas of the City in order to provide the widest range of affordable housing opportunities. The RFP produced 29 applications. The City is providing assistance to 7 developments located in all districts in the City, fulfilling the City's goal.

All HOME related contracts require an Affirmative Fair Housing Marketing Plan AFHMP (HUD 935.2A) attachment/exhibit that developers must sign and attest to during the duration of the agreement with the City of Miami/HCD.

Each recipient of HOME funds must comply with several requirements including, but not limited to:

- Describe proposed method of advertising to be used to market to those least likely to apply
- Display a Fair Housing Poster in any location where the sale/rental of assisted units (more than 5) takes place
- Ensure that a City of Miami (standard) project site sign is displayed in a conspicuous position with the HUD-approved Equal Housing Opportunity logo included during the construction or renovation of the project including the amount of assistance provided to the site; the City provides all housing developers with uniform specifications for said sign which is an exhibit to their loan agreement/contract (exhibit)The developer must submit notification of intent to begin marketing to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located no later than 90 days prior to the initiation of rental marketing activities

**Emergency Solutions Grant Program (ESG):** The ESG program is a formula grant program that allocates monies to assist persons who are homeless or at-risk of homelessness via a variety of funding mechanisms including operating/improving emergency homeless shelters. The City utilizes its ESG allocation to aid in providing important street outreach and referral services via a City Department known as the Miami Homeless Assistance Program (MHAP), and funding rapid re-housing or homelessness prevention assistance for very low-income persons (30% AMI), which is managed by a sub-recipient. The latter recommendation/award is based on an RFP process. ESG provides a foundation for homeless people to begin moving towards independent living. The current level of funding is based on the yearly homeless assistance appropriation, as well as the demand of HUD's other McKinney-Vento Act programs. The City of Miami does not operate homeless shelters, as this is a function of the County – although one of the major shelters in the County is located in downtown Miami. The City uses ESG funds to provide outreach services to the homeless and to fund rapid re-housing and homelessness prevention activities which are both operated by a sub-recipient who is vetted via a Request for Proposal process.

**Housing Opportunities for Persons with AIDS (HOPWA):** The City of Miami serves as the administrator of the formula grant-funded Housing Opportunities for Persons with AIDS (HOPWA) program for the entire

geographical area of Miami-Dade County. The goal and intent of the local HOPWA Program is to ensure that a continuum of housing options and related housing services are available to low income persons with Acquired Immunodeficiency Syndrome (AIDS) or related diseases to prevent homelessness of such individuals and their families. We directly address this population in further detail elsewhere in this document.

## **NON-FEDERALLY FUNDED PROGRAMS**

**Affordable Housing Trust Fund (AHTF):** The City of Miami Planning & Zoning Departments also collect financial contributions (as stipulated by the current Zoning Ordinance) from private developers who opt for specific provisions allowed by the City of Miami Zoning Code (Miami21) to developments providing a certain number of affordable units in a given project, as defined by the Code. These collections are then dedicated to the City's Affordable Housing Trust Fund (AHTF), with funding from this source used to further the HCD's existent housing programs, aiding both homebuyers (first-time and existent) and for-profit or not-for-profit developers (multi-family rental and homeownership projects), as delineated in the Affordable Housing Trust guidelines approved by City Commission in Resolution #07-0203. In the case of homeownership housing, households must qualify as having income of up to 150% of the AMI; in the case of rental housing, the income of renters must be at or below 80% AMI.

**The Miami Forever Bond:** Voted on and approved by City residents, is a \$400M general obligation bond that will fund projects that protect property from sea level rise and flooding, increase affordable housing, improve parks and cultural facilities, improve roadways and enhance public safety. Out of the \$400M, \$100M is for affordable housing and economic development activities. The City has issued a request for applications for multi-family affordable housing developments, where bond funding can potentially be used.

**Building Better Bonds:** The Miami-Dade County General Obligation Bonds (GOB Program), passed by County residents in November 2004, is the largest capital construction bond program in the County's history, encompassing over \$2 billion and spanning total project completion between 15 to 20 years. The bonds are legally backed by the full faith and credit of the County which has committed future taxes over the next 40 years to repay the bonds. Bond awards are made to projects – including affordable housing projects – at the discretion of the Miami-Dade County Commission.

**Community Redevelopment Agencies (CRA):** Two CRAs operate within City of Miami boundaries - one in the Southeast Overtown Park West neighborhood, and a second in the OMNI. Both are independent government agencies established by the City of Miami and Miami Dade County in the 1980s, pursuant to the Community Redevelopment Act of 1969. The main objective of the agencies is to eliminate slum and blight within their respective boundaries. The agency is governed by the Board of Commissioners of the City of Miami. The CRA funds its programs and projects primarily through Tax Increment Financing, which uses the increased property tax revenues collected by the City of Miami and Miami Dade County. In turn, the CRA reinvests these funds back into the Redevelopment Area by funding infrastructure and capital improvements, affordable housing and economic development projects.

**State Housing Initiatives Partnership program (SHIP):** The State Housing Initiatives Partnership program is the first permanently funded state housing program in the nation to provide funds directly to local governments to increase affordable housing opportunities on a noncompetitive basis. The funds are used to produce and preserve affordable homeownership and multifamily housing for very low, low and

moderate income families. The City of Miami uses SHIP dollars to fund emergency repairs, new construction, rehabilitation, down payment and closing cost assistance, construction and gap financing, mortgage buy-downs, matching dollars for federal housing grants and programs, and homeownership counseling. The program is funded by a documentary stamp program made possible by the State's Sadowski Act.

**Miami-Dade County Documentary Stamp Surtax Program:** Under Section 201.02 and 201.131 of the Florida Statutes, certain counties are authorized to levy a surtax on documents that transfer interest in Florida real property (transfers of interest in single-family residences are exempt from this surtax). In 1984, Miami-Dade County exercised that authority, establishing a Housing Assistance Loan Trust Fund and implementing the Documentary Surtax Program ("Surtax Program"). This program requires that at least 75% of the funds are allocated to successful agencies to benefit low-income families with incomes of 80% or less of AMI for the County. The remaining 25% are to be made available to moderate income families with incomes of up to 140% AMI. Surtax awards are made based on application process handled entirely by the County's Public Housing & Community Development Department, and presented for the review and approval of the Miami-Dade County Board of County Commissioners. Typically, surtax funds are used for activities including rental housing development, rehabilitation, homeownership, and mortgage assistance.

**Low-Income Housing Tax Credit Program:** The Low-Income Housing Tax Credit Program is a tool for private developers and not-for-profit entities to construct or rehabilitate affordable rental units. This program is operated by the Florida Housing Finance Corporation (FHFC) based in the state capital (Tallahassee) and via a competitive application process awards developers 9% tax credits in exchange for substantially rehabilitating or constructing (new) rental housing projects that set aside either 40 percent of the units at 60% of AMI or 20 percent or more units at 50% AMI or below.

**Miami-Dade County Food and Beverage Tax Funds:** The Food and Beverage (F&B) tax is a 1% sales tax levied on food and beverages to provide a dedicated source of funding collected County-wide to fund the County's two Homeless Assistance Centers (HAC) or supportive housing projects (for the formerly homeless) and/or homeless services but these funds are solely administered and managed by the Miami-Dade Homeless Trust (Trust), the main Continuum of Care (CoC) operator in our County (85% of the funds toward homeless and 15% toward domestic violence services). Again, F&B funds are awarded via a Request for Proposal (RFP) process.

## **ACTIVITIES**

The City of Miami stated in its FY2019-2023 Consolidated Plan that the current activities would focus on implementing policies that advance housing preservation and neighborhood revitalization, with the overall goal of improving the quality of life of the residents and preserving the social and historic character of low income neighborhoods threatened by gentrification. Specifically, the focus has been on the following activities:

- Affordable housing preservation through single-family rehab and residential code compliance assistance, supportive fair housing activities, down payment assistance, and funding affordable housing developments.
- Neighborhood revitalization through supporting economic development activities in the Commercial Business Corridors (CBCs) and concentrating funding for projects that will stimulate

revitalization within the Neighborhood Development Zones (NDZs). Other city areas are also being taken into consideration.

## **PRESERVE AFFORDABLE RENTAL HOUSING ACTIVITIES**

In order to preserve affordable rental housing opportunities within the City of Miami, the Department of Housing and Community Development is encouraging the construction of new rental units, especially within target areas, as specified in the FY2019-2023 Consolidated Plan, as well as the funding of existent LIHTC and/or affordable rental buildings in need of upgrades/renovations. Through this initiative, the City seeks to increase and preserve the inventory of affordable rental housing available to low and moderate income households. As recommended in the Housing Needs Assessment in the Consolidated Plan, the focus will be on serving those that are most in need of rental assistance, namely low-, very-low-, and low to moderate income residents. Below is a description of the activities:

**Multi-Family Rental New Construction:** To increase the inventory of affordable rental housing, the City of Miami encourages the construction of new rental units by partnering with non-profit and for-profit housing developers. The City provides construction loans, permanent mortgage loans, bridge loans, or loan guarantees for acquisition, rehabilitation, new construction, and refinancing.

**Multi-Family Rental Rehabilitation:** To preserve the affordable rental housing inventory, the City of Miami provides multi-family rental rehabilitation loans and/or grants for the preservation of affordable rental housing available to extremely low-, very low-, and low to moderate-income residents.

**Housing Choice Voucher Assistance:** The City of Miami provides rental subsidies to 136 low- and very-low, and moderate-income households through the Section 8 Program. Participants in the HCV program are free to choose any qualified housing in the private housing market located within the boundaries of Miami-Dade County. Generally, each participant pays at least 30% of their household income towards housing costs (including rent and utilities). A voucher that covers the rest of the costs, up to a limit, is issued by the administering housing agency. The HCD oversees the program from the City of Miami which serves households with incomes at or below 80 percent of the median income for the Metropolitan Statistical Area (MSA). Due to the high cost of rental units in Miami, the gap between what working poor, elderly and disabled people can afford in the rental market and what rents are has grown exponentially in recent years. This has placed even more demand on the program which has a very low level of attrition in our community.

**Section 8 Moderate Rehabilitation Program (Rental Assistance):** The city's Housing Choice Voucher Assistance program allows qualifying households to choose and lease or purchase safe, decent, and affordable privately-owned rental housing. The City oversees moderate-rehabilitation units in 16 buildings located in two of the City's five districts. The bulk of the units in this program are one-bedrooms (227), with 38 units offering two bedrooms, and a total of 15 studio apartments. The last waitlist for the S8 Mod Rehab program was established in 2003. At that time, data on applicant's race, sex, ethnicity, was not logged so we cannot address the characteristics of that waitlist at this time.

## **PRESERVE EXISTING AFFORDABLE HOUSING - HOMEOWNER RETENTION ACTIVITIES**

The City of Miami focuses on providing housing rehabilitation assistance to low and moderate income households in order to help them maintain and retain their homes, and prevent the existing housing stock

from continuing to decline. This is important because there are a substantial number of the single family homes in the City that fall below minimum housing quality standards (disrepair). Many of these homes are owned by low and moderate income homeowners who lack the financial capacity and/or credit history required to obtain home repair financing from private lenders. The goal is to assist homeowners with rehabilitation of housing, the removal of code violations, and replacement of unsafe structures. Preference has been given to the elderly and disabled. Below are the specific activities used to implement this policy:

**Single-Family Rehabilitation Program and Code Enforcement Assistance:** The City of Miami provides home improvement and rehabilitation assistance to homeowners throughout the City in order to improve the condition of existing housing stock. Under this rehab program, existing income-eligible homeowner(s) that reside and maintain a property as their principal residence in the City of Miami will be able to obtain a deferred loan to bring their property to decent, safe, and sanitary housing standards, or to correct existing code violations. Through this program, the City has been able to encourage low to moderate income owners that have illegal units to bring their properties up to code or to remove the illegal structures. The Department of Housing and Community Development plans to continue to work closely with the Code Enforcement Division of the city to target areas that have a high number of code violations. The intent is to provide incentives for homeowners to correct such code violations. Recently, the City had to up its maximum assistance amount under this program to \$50,000, from the previously approved amount of \$35,000, because of the serious conditions of the properties in the program, along with the rising local costs of construction materials.

**Housing Replacement:** The City provides assistance to replace dilapidated owner-occupied housing units which are not suitable for rehabilitation due to the extent of their needed repairs. Funds are used to defray the cost of temporary relocation expenses, demolition of the dilapidated structure, and soft and hard construction costs associated with the reconstruction of the new home. In Miami, the maximum loan under this program is \$150,000. Because of the shortage of housing funds, very few home replacements take place on any given year.

**Homeownership Preservation Program (HPP):** Expected to roll out by the end of 2020, and funded through the Miami Forever Bond with an initial \$4 million allocation, this will help homeowners who are retired or cash strapped “harden” the exterior envelope of single-family, owner-occupied homes, with a maximum assistance amount of \$50,000 per home. ten-year deferred loan for households up to 140% AMI and a tax assessed market value that does not exceed \$400,000. Work can encompass the replacement or repair of roofs, replacement of windows and/or window hurricane shutters and doors

## **HOMEOWNERSHIP ACTIVITIES**

The City of Miami continues working toward providing affordable homeownership opportunities for working class and moderate income families who are seeking to become homeowners, but need additional financial assistance to be able to afford their home. The City plans to continue to increase the inventory of affordable homeownership units through new construction of affordable housing units and its homeownership financing program. In addition, the City helps renters prepare for homeownership by referring them to Homebuyer Counseling Programs. The following describes the specific activities:

**Finance Construction of New Homeownership Units:** The City of Miami promotes affordable homeownership opportunities for low and moderate income families by financing new construction. The

City also provides hard and soft construction financing and permanent financing for affordable housing units.

**Provide Homeownership Financing:** To assist homebuyers in the purchase of a home, the City of Miami provides down payment, closing cost, and/or second mortgage financing assistance to eligible persons and households who are first time homebuyers. Although this assistance is available to anyone who wants to purchase a home in the City of Miami, City residents have access to the maximum allowable subsidy.

## **STIMULATE HOUSING DEVELOPMENT – OTHER NON-HUD ACTIVITIES**

In addition to the activities listed above, it has been important for the City of Miami to provide incentives to stimulate housing development. Such incentives help to off-set the barriers that make it difficult to undertake affordable housing projects. The following is a list of the incentives that the City of Miami provides in order to facilitate the development of affordable housing.

**Affordable Housing Incentives:** The City of Miami continues to provide incentives to developers through the Affordable Housing Incentive Plan. This plan provides developers of affordable housing projects with a number of local incentives that are intended to expedite the pre-development process and reduce certain cost(s) in connection with the production of affordable housing projects in the City of Miami. The incentives – which are ongoing—include:

- Expedited Permitting for Affordable Housing Projects.
- Under 3.15 and 3.16 of the Zoning Code (Miami 21) developers are provide with additional density if they agree to dedicate a certain percentage of their project units to specific income households (via a restrictive covenant).
- Impact Fee Deferrals.
- Reduction of Parking and Setback Requirements - Miami 21 allows for parking reduction for Low-Income Housing by process of exemption -- only up to fifty percent (50%) of the spaces generally required.
- Lien Removals for Affordable Housing properties

**Training/Workshops for Developers on City Programs and Regulations:** HCD seeks opportunities to work with other City departments and Miami-Dade County to provide training to developers on the rules and regulations that govern the development process. Such training may include workshops on the permitting process, zoning, and environmental clearances.

**Increase Capacity of Non-profit Housing Providers:** To help improve the capacity of non-profit housing providers, the City of Miami provides various services intended to assist these organizations. Furthermore, the City encourages CDCs to partner with private developers by giving developers extra credit points in their RFP applications if they have a 51 percent partner that is a non-profit.

## **SPECIAL NEEDS AFFORDABLE HOUSING ACTIVITIES**

The City of Miami is committed to assisting persons with special needs, and their families, obtain affordable housing. Special needs populations include the elderly, individuals living with HIV/AIDS, and persons with disabilities who are within the very low to moderate income range. The activities for special needs populations are described below:

**Housing Opportunities for the Elderly:** The City continues to seek opportunities to fund rehabilitation and new construction of residential projects that are Section 202 Supportive Housing.

**Senior Rental Assistance Program:** Funded with general funds for the 19-20 Fiscal Year, this program provides assistance to income-eligible (40% AMI) senior households (ages 62 and up) who spend more than 50% of their household income on housing costs AND who live in City-assisted rental housing or subsidized buildings within City of Miami limits. The program provides up to \$100 a month toward rental housing assistance, for up to a year, for qualifying households.

**Housing Opportunities for People with AIDS:** Through the HOPWA Tenant-Based Rental Assistance (TBRA) program, the City of Miami works to expand housing opportunities for county residents that are low to moderate income and have been diagnosed with AIDS with approximately 850 clients assisted per year. The City has also operated a Short Term Rental and Mortgage Utility (STRMU) program for the last few years for low- to moderate-income persons with HIV/AIDS – who are not HOPWA TBRA clients – and whom have had some emergency situation that has set them back in related housing expenses, STRMU assists approximately 50 households a year for a maximum of 21 weeks and helps stabilize their housing so they are not at risk of losing their place of residence.

**Homeless Program:** The HCD continues its efforts in the prevention of homelessness by supporting the City of Miami’s Homeless Program and its street outreach programs via Emergency Solutions Grant (ESG) funding. The City’s Homeless Office provides outreach services in the form of referrals for a myriad of social services, including behavioral, mental, health, and supportive housing. The City also funds a sub-recipient to provide homelessness prevention and rapid re-housing assistance to very low-income persons and families who are homeless and/or at risk of homelessness (with a court ordered eviction notice). Operated under the programmatic name HAND, the City’s funding assists some 110 households a year.

## **AFFORDABLE HOMEOWNERSHIP OPPORTUNITIES**

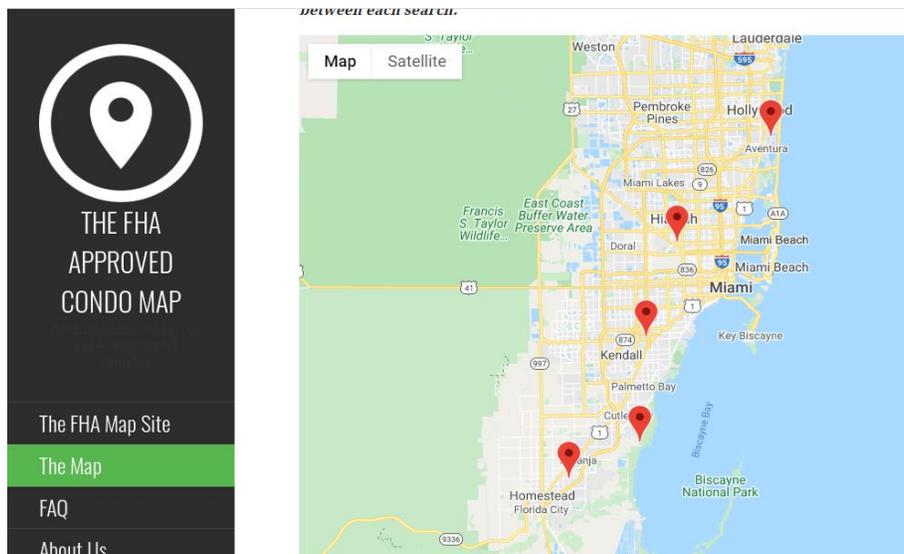
An FHA mortgage is a loan provided by an FHA approved lender but backed by the Federal Housing Administration (providing additional security to the lender). This loan program only requires a 3.5% down payment (or equity for a refinance) for people with good credit scores. It is possible for someone with a weaker credit score to qualify for the FHA program with 10% down. The 3.5% down payment program is highly desirable for people that have the income to buy a home, but may not have much of a down payment (or those who just want to minimize their down payment). The inability to get certification hurts condos’ affordability, since buyers who seek financing without it face greater interest rates, and down payments of around 20 percent, rather than the FHA’s customary 3.5 percent.

After the real estate collapse, and the tightening of FHA rules, many communities saw a sharp decline in the number of FHA approved condominium buildings and Miami was no exception. After conversations with the MIAMI Realtors Association, the lack of FHA approved condominiums has become a housing impediment. Foremost, for one buyer in a condominium building to be approved for an FHA loan, the entire complex must follow specific guidelines including that at least 50% of the development’s units must be owner-occupied, no more than 15% of the total units can be over 60 days late in their association fees, and the association cannot be party to a pending legal action. Getting FHA approved also requires extensive documentation – both financial and insurance documents (hazard, floor, liability, and fidelity bond/insurance) and many developers opt to not go through that process. Aside from these difficulties, there is also a common misconception that FHA Loans are for low-income households although statistics indicate that some 60% of homebuyers use an FHA Loan. This too can create a “stigma” tied to FHA loans

amongst condo owners (associations) who can opt to avoid the complicated FHA review/approval process altogether. Besides this, Florida law allows condominium boards to waive reserves and there is a ban of co-insurance on hazard insurance policies. The Miami Association of Realtors has also reported that estimates indicate that approximately 95% of condominiums in South Florida have co-insurance, as such making them ineligible for FHA insured loans. Moreover, the Association also points out that the FHA doesn't have a policy to accept pooled or state-run insurance companies.

Reports indicate that in the County's entire roster of 4,760 condo projects, only 7 are approved as of March 2020<sup>13</sup>, and not one is located within City of Miami limits. This comes even after the FHA issued new condominium approval rules that became effective in October 2019 (Docket #: FR-5715-F-02), hoping to promote affordable and sustainable homeownership. The rules established a new condominium process that supposedly allow certain individual condominium units to be eligible for FHA mortgage insurance even if the condominium project is not FHA approved. The new rules included that (1) for condominium projects with 10 or more units, no more than 10 percent of individual condo units can be FHA-insured; and projects with fewer than 10 units may have no more than two FHA-insured units and (2) FHA will insure mortgages for selected single-unit approval that is located in a completed project that is not approved and has at least five dwelling units.

Below is a snapshot of the FHA map as of March 31, 2020 which shows the low concentration of projects (five) and units in an area where there are thousands of condominium offerings. Perhaps it will take more time for the new FHA guidelines to settle into the marketplace and catch on, given that these were only issued a few months ago or perhaps the process continues to be too laborious for potential buyers/condominium projects.



Upon discussions with the MIAMI Realtors Association, and the issues the latter creates for their business, several factors were brought up as potential reasons why most buildings' homeowners associations' are opting to NOT obtain FHA approval for their buildings including (but not limited to): (1) the long and overall cumbersome process of acquiring the approval, and the need to hire someone to facilitate it at a heavy cost to the HOA; (2) the requirement of the ten percent of income that must be regularly deposited in a

<sup>13</sup> <https://entp.hud.gov/idapp/html/condo1.cfm>

reserve account; (3) the requirement of a minimum of a 50% owner occupancy rate; (4) and finally, the misconception by many persons that household's wanting to use an FHA loan are in fact, low income, or receiving some type of government subsidy and will be a "liability" the building and become delinquent on their fees and/or their mortgage, creating a stigma in the marketplace associated with these types of loans. An FHA loan requires the loan applicant to live in the apartment as a principal residence (homestead property).

Based on conversations with the local real estate industry, there is misinformation, or the misconception amongst some members of the public, that because the FHA insures loans with down payments of as little as 3 percent, and borrowers with less-than-perfect credit, that these factors always correlate to excessive risk. According to an analysis from the *Urban Institute*, all else being equal, the default rates on loans with down payments of 3-5 percent are actually quite similar to the default rates on loans with down payments of 5-10 percent.

Based on conversations with the MIAMI Realtors Association, the main issue is the reserve requirements of the Rule. Generally, the proposed reserve requirement would be at least 10 percent of the monthly unit assessments. A lower amount could be deemed acceptable by HUD based on a reserve study completed not more than 24 months before a request for a lower reserve amount is received (§ 203.43b(d)(6)(x)). Due to widespread issues with Condominium Associations across the State of Florida related to theft, many associations purposefully opt to NOT have large amounts in reserves. Data indicates that the State has more than 47,000 community associations. In Florida, HOA's are governed by Chapter 720 of the Florida Statutes but there is no agency that enforces the Florida HOA statutes, meaning that potential fraud by member(s) of associations would place the burden of proof on the homeowners interested in pursuing a case through the courts, including what can be expensive legal counsel. Florida's Division of Florida Condominiums, Timeshares, and Mobile Homes under the State's Department of Business and Professional Regulation deals only with administrative issues such as elections and recalls. The HCD believes that FHA condo approvals can dramatically increase the pool of potential buyers in any community. Also, buyers who use FHA loans are more likely to reside in the unit, and not rent it out. This is a win for the building as they will not have absentee landlords renting their units.

## **PUBLIC HOUSING**

Public Housing (PH) in our area is operated/managed by the Public Housing and Community Development (PHCD) Department of Miami-Dade County. HUD's provided pre-populated data from the Public Housing Information Center (PIC) in the charts below include both Miami-Dade's PH and Section 8 (S8) programs *combined* with the City's Section 8 program. We have elected to use a combination of the pre-populated data with other credible data sources to further refine this narrative and analyze the PH units within our jurisdiction. The data shows (Table PH-1) that there are 8,077 Public Housing units in use and 13,516 Section 8 units, the bulk of these tenant based (13,184). The County's Housing Choice Voucher Section 8 units are spread throughout the 30+ municipalities. Data indicates that 6,800 of the public housing units are located within City limits at 65 different sites.

When looking at the age of the PH sites in the City, more than half (35) were built on or before 1973 making them at least 40 years old. Given the age of the PH stock within our jurisdiction, the City supports the implementation of the PHCD's FY2018 5-Year Plan and the Annual Capital Fund Program (CFP) to renovate or modernize public housing units so that occupancy is maximized and current stock is preserved, especially given the demand for these units. During an application cycle that ran from July 7-

31, 2008, PHCD received 71,376 applications for the waitlist for its *project-based* (Public Housing and Moderate Rehabilitation), Assisted Living Facilities, and *tenant-based* (Section 8 Housing Choice Voucher) programs, an obvious sign of the overwhelming demand for income-restricted housing County-wide.

Table PH-1: Public Housing Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-Based	Tenant-Based	Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of Units in Use	97	2,339	8,077	13,516	51	13,184	0	41	52

\*Includes Non-Elderly Disabled, Mainstream Five-Year, and Nursing Home Transition

Source: PIC (PIH Information Center)

Table PH-2: Public Housing Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-Based	Tenant-Based	Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	
Homeless at Admission	2	15	0	1	0	1	0	0	
Elderly Program Participants (>62)	12	1,536	3,772	4,524	23	4,440	0	4	
Disabled Families	84	399	1,127	2,561	8	2,480	0	7	
Families Requesting Accessibility Features	97	2,339	8,077	13,516	51	13,184	0	41	
HIV/AIDS Program Participants	0	0	0	0	0	0	0	0	
DV Victims	0	0	0	0	0	0	0	0	

Source: PIC (PIH Information Center)

Table PH-3: Public Housing Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-Based	Tenant-Based	Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	
White	31	1,769	3,705	6,158	28	6,002	0	13	
Black/African American	65	568	4,353	7,328	21	7,154	0	28	
Asian	0	0	10	6	0	6	0	0	
American Indian/Alaskan Native	0	0	9	14	1	13	0	0	
Pacific Islander	1	2	0	10	1	9	0	0	
Other	0	0	0	0	0	0	0	0	

Source: PIC (PIH Information Center)

Table PH-4: Public Housing Ethnicity of Residents

Ethnicity	Program Type			Vouchers				
	Certificate	Mod-Rehab	Public Housing	Total	Project-Based	Tenant-Based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Hispanic	23	1,854	3,867	6,391	30	6,235	0	12
Not-Hispanic	74	485	4,210	7,125	21	6,949	0	29

Source: PIC (PIH Information Center)

## **THE HOME MORTGAGE DISCLOSURE ACT - HMDA**

HMDA was enacted by Congress in 1974 and requires that certain financial institutions (banks, savings associations, credit unions, and other mortgage lending institutions) make public information about their home loans by: 1) the applicant's race and income, 2) the type, purpose, and amount of the loan, 3) the loan application decision, and 4) the census tract of the property to be financed. The loan data discussed in this section was pulled directly from the Federal Financial Institutions Examination Council's website [www.ffiec.gov](http://www.ffiec.gov).

HUD recommends that HMDA data be included in an AI as an analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community. Home Mortgage Disclosure Act (HMDA) data contains records for all residential loan activity, reported by banks. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. HMDA reports several types of housing loans including purchase loans, refinancing loans, and home improvement loans. Purchase loans are simply loans that are being used to purchase (transfer the title of) a home. This is distinct from home improvement loans which are loans being used to modify an existing home without having the property change hands. Finally, refinancing loans are utilized to take advantage of better interest rates, to consolidate loans, to reduce monthly payments amounts, and in some instances to reduce the risk level by switching from a variable-rate to a fixed-rate loan.

The most recent free data available for our general area encompasses what the FFIEC reports refer to as the *Miami-Miami Beach-Kendall MSA*. The data included in this analysis encompasses data for the last three available years (2016-2018) across this entire MSA. To be clear, Miami is one of several municipalities within this area and as such, the data noted here encompasses a geographic area much wider and larger than that of our City alone. A more careful analysis of loans that would have solely focused on loans made within our City was not possible, as it would require both an indefinite research expense and a significant investment of time to sort through loans within particular tracts and the an additional qualification of the property address. Given our City and Department resources, our analysis here is more general. Please note that the demographic and income information provided in the loan tables below pertains to the primary applicant only.

In order to address HMDA data accurately within our MSA, we would also need to stress the higher-than-average amount of real estate cash transactions the Miami MSA has experienced for several years, which

would obviously **not** be reflected in the HMDA data below. For reasons already stated, Miami sees a large amount of foreign capital and many investors from outside the U.S. have elected to purchase property here, either for rental purposes or for second/third home purposes. These cash sales are difficult to track by a municipality (and our Department) and so we must rely on industry reports for some type of general data to better understand their role in our marketplace.

In the tables that follow, we look at conventional loans followed by FHA loans between 2016 and 2018. In comparing Tables HMDA-1, HMDA-2, and HMDA-3, we first make some general observations. To begin, the largest number of loan applications received for our MSA in the conventional loan category was in the *Refinancing* category, with approximately 81,745 received in three years. That was followed up by the number of *Home Purchase* loans, which amounted to some 70,334 applications in three years. Finally, the fewest number of applications received was in the *Home Improvement* category with a total of some 19,663 in the last three years. Conversely, the highest denial rates are seen in the Home Improvement category with a three-year average of 57.2 percent denial rate.

When focusing on Table HMDA-1 (Conventional Home Purchases), the amount of applications has steadily increased since 2016 as well as the percentage of loans issued which was 63.5 percent in 2018. The percent denied has remained pretty steady though, oscillating somewhere in, or around 17.5%.

### **Conventional Loan Applications (Latest 3 years of data available)**

Table HMDA-1: Home Purchase Loan Applications in Miami-Dade County

Reporting Year – 2018								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	62	27	43.5	3	17	27.4	14	1
Asian	583	357	61.2	13	91	15.6	96	26
Black/African American	1,319	706	53.5	45	322	24.4	193	53
White	21,662	14,031	64.8	525	3,448	15.9	2,898	760
Other	344	205	59.6	9	87	25.3	40	3
Race not Available	2,288	1,358	59.4	71	510	22.3	301	48
<b>Total by Race</b>	<b>26,258</b>	<b>16,684</b>	<b>63.5</b>	<b>666</b>	<b>4,475</b>	<b>17.0</b>	<b>3,542</b>	<b>891</b>
Hispanic*	22,635	15,218	67.2	441	3,491	15.4	2,772	713
Reporting Year - 2017								
Race/Ethnicity	# of Applications	# of Loans Issued	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	32	18	56.3	0	1	3.1	4	0
Asian	573	350	61.1	13	98	17.1	4	0
Black/African American	1,032	534	51.7	36	256	24.8	152	54
White	18,296	11,742	64.2	402	2,987	16.3	2,504	661
Other	248	148	59.7	4	44	17.7	34	18
Race not Available	2,244	1,233	54.9	63	534	23.8	342	72
<b>Total by Race</b>	<b>22,425</b>	<b>14,025</b>	<b>62.5</b>	<b>518</b>	<b>3,920</b>	<b>17.5</b>	<b>3,133</b>	<b>820</b>
Hispanic*	14,159	9,103	64.3	293	2,351	16.6	1,886	526
Reporting Year - 2016								
Race/Ethnicity	# of Applications	# of Loans Issued	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	31	19	61.2	0	8	25.8	4	0
Asian	433	253	58.4	15	101	23.3	47	17
Black/African American	1,006	518	51.5	33	250	24.9	164	41

White	17,302	11,018	63.7	470	2,985	17.3	2,273	556
Other	194	135	69.6	5	31	16.0	19	4
Race not Available	2,685	1,637	61.0	110	535	19.9	303	100
<b>Total by Race</b>	<b>21,651</b>	<b>13,580</b>	<b>62.7</b>	<b>633</b>	<b>3,910</b>	<b>18.1</b>	<b>2,810</b>	<b>718</b>
Hispanic*	13,050	8,371	64.1	347	2,264	17.3	1,642	426

Source: <https://www.ffiec.gov/hmdaadwebreport/aggwelcome.aspx>

\*Hispanic ethnicity is counted independent of race

\*\*Other indicates combined totals of Native Hawaiian/Pacific Islander, 2 or more minority races, and joint (white/minority race)

## **Conventional - Home Refinance Loans (Latest 3 years of data available)**

There has also been a considerable decrease in the amount of applications submitted for home refinance loans (Table HMDA-2) from 2016 to 2018. There were 39,887 applications submitted in 2016 but only 13,856 in 2018. The lack of popularity of home refinance loans makes sense, given that interest rates dropped to low levels below 4 percent in 2016 and have remained low to present. Most households that wanted to refinance jumped on their opportunity early in 2016. With industry insiders predicting that interest rates will remain steady, this trend might continue.

Table HMDA-2: Home Refinance Loan Applications in Miami-Dade County

Reporting Year - 2018								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	129	7	5.4	2	114	88.4	3	3
Asian	191	57	29.8	5	67	35.1	46	16
Black/African American	884	250	28.3	37	341	38.6	174	82
White	7,363	2,899	39.4	230	2,240	30.4	1,432	562
Other	144	50	34.7	3	54	37.5	30	7
Race not Available	5,145	2,101	40.8	198	1,452	28.2	989	405
<b>Total by Race</b>	<b>13,856</b>	<b>5,364</b>	<b>38.7</b>	<b>475</b>	<b>4,268</b>	<b>30.8</b>	<b>2,674</b>	<b>1,075</b>
Hispanic*	6,221	2,399	38.6	195	1,935	31.1	1,210	482
Reporting Year - 2017								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	89	24	27.0	0	30	33.7	23	12
Asian	399	147	36.8	12	109	27.3	78	53
Black/African American	2,984	969	32.5	106	979	32.8	640	290
White	18,688	7,833	41.9	647	4,757	25.5	3,875	1,576
Other	338	129	38.2	9	96	28.4	68	36
Race not Available	5,504	1,953	35.5	217	1,655	30.1	1,163	516
<b>Total by Race</b>	<b>28,002</b>	<b>11,055</b>	<b>39.5</b>	<b>991</b>	<b>7,626</b>	<b>27.2</b>	<b>5,847</b>	<b>2,483</b>
Hispanic*	15,179	6,317	41.6	532	3,914	25.8	3,144	1,272
Reporting Year - 2016								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	138	41	29.7	5	46	33.3	29	17
Asian	647	225	34.8	35	214	33.1	119	54
Black/African American	3,744	1,035	27.6	114	1,529	40.8	713	353
White	27,703	11,232	40.5	918	8,461	30.5	4,701	2,391
Other	412	140	34	12	149	36.2	72	39
Race not Available	7,243	2,580	35.6	343	2,505	34.6	1,097	718
<b>Total by Race</b>	<b>39,887</b>	<b>15,253</b>	<b>38.2</b>	<b>1,427</b>	<b>12,904</b>	<b>32.4</b>	<b>6,731</b>	<b>3,572</b>
Hispanic*	21,393	8,509	39.8	739	6,609	30.9	3,606	1,930

Source: <https://www.ffiec.gov/hmdaadwebreport/aggwelcome.aspx>

\*Hispanic ethnicity is counted independent of race

\*\*Other indicates combined totals of Native Hawaiian/Pacific Islander, 2 or more minority races, and joint (white/minority race)

## Home Improvement Loans (Latest 3 years of data available)

In relation to home improvement loans, although the applications for these have steadily climbed in the past three years, denial percentages continue to be very high. These are in fact much higher than those seen amongst the other two conventional loan categories (purchase and refinancing). These overall higher denial rates could be attributed to the fact that many Miami-Dade homeowners are underwater and owe more on their homes than what they are worth. According to an article in The Real Deal, Miami leads the nation with the highest percentage of mortgaged homes with negative equity of any major metropolitan area. As of the end of Q2 of 2017, 14.7 percent of homes had a negative equity. However, it is good news to know that this trend has been slowly decreasing in comparison to previous years.

Table HMDA-3: Home Improvement Loan Applications in Miami-Dade County

Reporting Year – 2018								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	71	8	11.3	0	55	77.5	4	4
Asian	210	47	22.4	5	133	63.3	17	8
Black/African American	712	129	18.1	18	476	66.9	62	27
White	6,611	1,745	26.4	139	4,041	61.1	375	311
Other	150	47	31.3	0	91	60.7	7	5
Race not Available	1,030	325	31.6	8	504	48.9	132	61
<b>Total by Race</b>	<b>8,784</b>	<b>2,301</b>	<b>26.2</b>	<b>170</b>	<b>5,300</b>	<b>60.3</b>	<b>597</b>	<b>416</b>
Hispanic*	5,403	1,262	23.4	106	3,530	65.3	281	224

Reporting Year – 2017								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	35	4	11.4	0	26	74.3	3	2
Asian	73	14	19.2	3	46	63.0	7	3
Black/African American	655	151	23.1	12	428	65.3	42	22
White	3,864	1,217	31.5	98	2,020	52.3	376	153
Other	56	11	19.6	0	36	64.3	6	3
Race not Available	980	297	30.3	25	491	50.1	111	56
<b>Total by Race</b>	<b>5,663</b>	<b>1,694</b>	<b>29.9</b>	<b>138</b>	<b>3,047</b>	<b>53.8</b>	<b>545</b>	<b>239</b>
Hispanic*	3,328	982	29.5	77	1,837	55.2	306	126

Reporting Year – 2016								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	53	14	26.4	1	33	62.3	3	2
Asian	51	17	33.3	2	27	52.9	3	2
Black/African American	652	128	19.6	13	462	70.9	36	13
White	3,575	1,166	32.6	75	1,955	54.7	233	146
Other	71	19	26.8	1	43	60.6	6	2
Race not Available	814	214	26.3	17	487	59.8	62	34
<b>Total by Race</b>	<b>5,216</b>	<b>1,558</b>	<b>29.9</b>	<b>109</b>	<b>3,007</b>	<b>57.6</b>	<b>343</b>	<b>199</b>
Hispanic*	3,050	897	29.4	62	1,805	59.2	171	115

Source: <https://www.ffiec.gov/hmdaadwebreport/aggwelcome.aspx>

\*Hispanic ethnicity is counted independent of race

\*\*Other indicates combined totals of Native Hawaiian/Pacific Islander, 2 or more minority races, and joint (white/minority race)

## **FHA Loans (Latest 3 years of data available)**

When looking at the trends in applications for FHA loans in the Miami-Dade MSA from 2016 to 2018, it is clear that the amount of applications has steadily increased with 16,182 applications submitted in 2018. However, in this same year, the number of applications for conventional home purchase loans was 10,000 higher than the amount of FHA loans – 26,258 total. Denial rates for the FHA loans varied from year to year showing a slight decline in the past year at 24.2 percent. Approval rates during those years have also varied with an only 47.2 percent issuance rate in 2018. A number that is concerning as approval rates for FHA loans have oscillated in the mid-60 percentage range since 2014.

Table HMDA-4: FHA Loan Applications in Miami-Dade County

Reporting Year - 2018								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	31	12	38.7	7	8	25.8	3	1
Asian	185	38	20.5	31	101	54.6	11	4
Black/African American	2,035	834	41.0	512	251	12.3	300	138
White	11,200	5,104	45.6	1,499	2,998	26.8	1,238	361
Other	46	8	17.4	0	31	67.4	3	4
Race not Available	2,685	1,637	61.0	110	535	19.9	303	100
<b>Total by Race</b>	<b>16,182</b>	<b>7,633</b>	<b>47.2</b>	<b>2,159</b>	<b>3,924</b>	<b>24.2</b>	<b>18,958</b>	<b>608</b>
Hispanic*	7,493	4,700	62.7	135	1316	17.6	1030	312
Reporting Year - 2017								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	14	8	57.1	0	5	35.7	0	1
Asian	50	26	52.0	1	14	28.0	7	2
Black/African American	1,123	675	60.1	31	219	19.5	159	39
White	7,724	5,415	70.1	112	996	12.9	1,014	187
Other	19	13	68.4	0	3	15.8	3	0
Race not Available	2,685	1,637	61.0	110	535	19.9	303	100
<b>Total by Race</b>	<b>11,615</b>	<b>7,774</b>	<b>66.9</b>	<b>633</b>	<b>3,910</b>	<b>33.7</b>	<b>2,810</b>	<b>718</b>
Hispanic*	7,316	5,117	69.9	109	972	13.3	939	179
Reporting Year - 2016								
Race/Ethnicity	# of Applications	# of Loans Originated	% Issued	Approved but Not Accepted	# Denied	% Denied	# Withdrawn	Closed for Incompleteness
American Indian/Alaska Native	8	5	62.5	0	1	12.5	2	0
Asian	51	31	60.8	0	12	23.5	7	1
Black/African American	1,259	762	60.5	29	252	20.0	176	40
White	8,310	5,795	69.7	114	1,179	14.2	1,013	209
Other	151	100	66.2	2	29	19.2	20	0
Race not Available	466	238	55.1	7	128	27.5	78	15
<b>Total by Race</b>	<b>10,245</b>	<b>6,931</b>	<b>67.7</b>	<b>152</b>	<b>1,601</b>	<b>15.6</b>	<b>1,296</b>	<b>265</b>
Hispanic*	7,736	5,400	69.8	98	1,109	14.3	937	192

Source: <https://www.ffiec.gov/hmdaadwebreport/aggwelcome.aspx>

\*Hispanic ethnicity is counted independent of race

\*\*Other indicates combined totals of Native Hawaiian/Pacific Islander, 2 or more minority races, and joint (white/minority race)

## Affirmative Marketing Fair Housing Efforts

Pursuant to HUD regulations, 24 CFR 92.351, the City of Miami adopted affirmative marketing procedures and requirements for rental and homebuyer projects containing five or more HOME/CDBG-assisted housing units. Furthermore, the City's policies are consistent with Davis-Bacon and Section 3 protocols.

Affirmative marketing consists of providing information and attracting eligible persons in the housing market area to available housing without regard to race, color, national origin, sex, religion, familial status or disability. Affirmative marketing procedures do not apply to families with Section 8 tenant-based rental housing assistance or families with tenant-based rental assistance provided with HOME funds.

The City's affirmative marketing policy and procedures address the following elements:

### 1. Informing the Public, Owners, and Potential Tenants:

Acceptable methods for informing the public, owners, and potential tenants about the applicable Federal Fair Housing Laws and HOME Program's affirmative marketing policy may include, but are not limited to, using the Equal Opportunity logo OR slogan in relevant printed materials, project signage, posting this information on the Department's web site, and explaining the policy in general to property owners, and tenants involved with the HOME/HOPWA/Sec. 8 Programs.

### 2. Advertising Units and/or Community Outreach:

In order to meet the obligations towards the City's/HCD's affirmative marketing policy requirements as required by 24 CFR 92.351, each property owner/developer who receives federal funding from the City must submit a completed and signed AFHMP Plan (HUD 935.2A/2B), as an exhibit to their executed contract with the City, that clearly specifies activities they will use to advertise vacant units, including but not limited to any printed advertisement(s), any local community contacts they will reach out to assist in informing the public of available units, and the use of any possible printed material (brochures, leaflets, etc.). This final AFHMP plan must also be submitted by the developer/owner with the local Fair Housing & Equal Opportunity Office and serves to satisfy the requirements of 24 CFR 200.620 which indicates that all FHA subsidized or unsubsidized programs shall require the applicant (developer) to carry out an affirmative program to attract buyers or tenants, regardless of sex, handicap or familial status, of all minority and majority groups to the housing for initial sale or rental. As indicated on the form itself, the advertisement(s) should be published/placed in a manner calculated to inform eligible persons who may otherwise be least likely to apply for the unit. City ordinance #13491 also requires that any developer with a project that receives affordable or workforce housing incentives or benefits from the City, its departments, instrumentalities, or Community Redevelopment agencies, including but not limited to financing, grants, impact fee waivers or deferrals, parking waivers or reductions shall provide notice to the Department of Housing & Community Development AND the Zoning Department at least 60 days prior to the initial leasing/sales period of the assisted/incentivized unit so that elected officials can notify their residents of the availability of these units. Upon receipt of the developer's written notification, the Department then issues a formal memorandum (via e-mail) advising the elected officials' office and shares the project details.

### 3. Recordkeeping:

The City of Miami requires recipients to maintain records that describe efforts taken by the recipients and by the owners to affirmatively market units for the period covered by the loan agreement. The City will use those records to assess the results of these actions. The developer is responsible for

updating the AFHMP if the property's circumstances change (changes to area demographics or local housing market area).

**4. Limited English Proficiency (LEP) Requirements:**

Although LEP individuals are not a protected class, housing owners/developers must take reasonable steps to ensure meaningful access to the information and services they provide for persons with LEP. This may include interpreter services and/or written materials translated into other languages. HUD-specific LEP guidance was published in the Federal Register on January 22, 2007, as "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons," as required by EO 13166. Additional guidance was issued by HUD in September 2016 (by the Office of General Counsel Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency), noting that a lack of English proficiency can be a proxy for national origin, and practices that restrict access to housing on the basis of LEP can have a discriminatory effect based on national origin, race, or other protected characteristic, even when the housing provider has no intent to discriminate.

**5. Assessment of Affirmative Marketing Efforts of Owners:**

The City of Miami Housing unit requires that assisted owners/developers submit copies of their advertisement(s) for rental units and homeownership opportunities, correspondence and information to the HCD for inclusion in the project file. Marketing efforts typically begin as indicated on the submitted AFHMP form, with the standard being usually three to six months prior to the completion of the project's construction. The HCD's Housing unit assesses the owner's affirmative marketing plan and the results of these efforts, communicating any concerns and/or requesting adjustments. Should an owner fail to follow these affirmative marketing efforts, the HCD will refer to the matter to the local FHEO office and to the local FHIP.

# IMPEDIMENTS

## Impediments to fair housing choice and the recommendations to address them

The impediments that follow are based on the research, data and information presented in previous chapters of this AI. The impediments identified in the following section elaborate on data/information provided earlier in this document. We break up the Impediments as suggested by the HUD issued *Fair Housing Planning Guide*. Impediments are divided into three sections: 1.) Private Sector; 2.) Public Sector; and 3.) Public and Private Sector.

### Private sector

#### REAL ESTATE MARKET

Impediment FH1:

**Increased Housing (Cost) Burden for approximately 55.8% of City households (renters and homeowners combined) due to the rising costs of housing in the City of Miami along with stagnant wages.**

A high percentage of City of Miami residents – both homeowners and renters – are paying more than 30 percent of their income for housing, defining them as cost-burdened. This increased housing burden must be addressed on a City-wide level to prevent further loss of homeownership, increases in foreclosures and evictions, bankruptcies, and potential homelessness.

- Leverage Miami Forever Bond allocation (\$80 million for affordable housing development) with a 20:80 ratio between Forever Bond and Other Public/Private sources via an RFP pipeline process. This means that for every dollar the City invests, it will be requiring a leverage of \$4 dollars from public and private sources.
- Engage, inform, and work with City leadership (elected officials) to retain and create additional housing opportunities for extremely low, very low, and low-to-moderate-income persons.
- Advocate for policies requiring that a larger percentage of rental units financed by government capital dollars (LIHTC) be set aside for VLI households at 30% or below of median income.
- Continue to implement the actions to increase affordable housing as identified in the 2019-2023 Consolidated Plan and the recommendations of the draft Affordable Housing Master Plan, at the discretion of the City Commission.
- Continue funding the Single-Family Rehabilitation and Replacement programs to aid in preservation of homeownership, as well as the first-time homebuyer program to encourage new homeownership.
- Explore the potential of establishing a local tenant protection law, upon review of other municipalities’ best practices.

### Impediment FH2:

#### **Very Few Multi-Family Buildings in the City Seek FHA approval.**

Even though the bulk of Miami’s housing stock is comprised of units in multi-family buildings, there is a significant lack of FHA approved condominium buildings in the City. As of March 2020, there are no buildings in the entire City of Miami that are FHA approved. This means low-, moderate- and middle-income working class persons who are interested in purchasing a home with an FHA loan cannot purchase a unit (primary residence) in any of Miami’s multi-family buildings, even when just over 50%<sup>14</sup> (104,448) of the City’s entire housing stock is comprised of multi-family buildings of ten or more units.

#### **Recommendations:**

- The HCD will continue to work with the Miami Realtors Association to further their efforts on a local, state and federal level.
- The HCD will draft marketing materials targeting multi-family condominium associations, with information on how to become an FHA approved building, including the Miami Realtors Association’s rack brochure on this topic.

## **Public sector**

### **LAND USE, ZONING, AND SITE SELECTION**

#### Impediment FH3:

#### **Scarcity of developable vacant parcels diminishing the new construction of single-family and/or smaller apartment developments thereby housing choice.**

There is a land shortage in the City of developable, residentially zoned vacant tracts and many of the available vacant parcels are scattered and situated in the City’s most economically distressed neighborhoods, requiring development on an in-fill basis. A property is determined to be developable for a single family dwelling if it meets the minimum lot criteria of 5,000 square feet, plus a minimum of 2 parking spaces per home are required. In addition, the city needs to consider how the application of zoning regulations and parking requirements can be “tweaked” to encourage the development of single-family homes and smaller-scale buildings (20 units or less) on these smaller parcels.

#### **Recommendation**

- The HCD will continue to manage a citywide Infill Program and will ensure that available city-owned parcels in that program are used for the provision of affordable housing.
- The HCD will support any viable efforts by the City’s Planning and Zoning Board in relation to amending the City’s zoning code to encourage small-scale development, thereby expanding housing choice for all City residents.
- HCD will continue to prepare request for lien removals for eligible affordable housing properties.

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<sup>14</sup> (B25024, ACS 2017, 1-yr estimate)

## **PUBLIC ASSISTED HOUSING**

### Impediment FH4:

#### **There is a lack of adequate federal funding for rental assistance programs.**

Federal funding vehicles for low-income housing creation/preservation continue to be cut. Demand for Section 8 vouchers in all Miami-Dade communities, along with demand for public housing units, is startling. Unfortunately, for those who are not randomly selected for waitlists, there is no funding available to be able to assist them in meeting their monthly rental obligations. In addition, the latest HIV/AIDS Housing Gap Analysis conducted in 2019 estimated that there were 9,556 individuals/households living with HIV/AIDS in Miami-Dade County in need of housing assistance.

### **Recommendations**

- The HCD will continue to accommodate as many HOPWA clients as possible in the City's Tenant-Based Rental Assistance (TBRA) Program.
- The HCD will continue to fund the HOPWA Short Term Rental Mortgage & Utility Assistance Program (STRMU) to assist HIV+ persons who are not TBRA recipients remain housed in the event of a valid emergency.
- The HCD will continue to fund private developers to build affordable housing units within the limits of the City of Miami. In return for the City funding a portion of the total cost of the project, the developer provides a pre-determined number of affordable rental housing units to be rented to low-to-moderate income families. The number of affordable housing units in a project is based on the amount of subsidy provided by the City.
- The HCD will support the PHCD in their efforts to develop HUD approved RAD projects within City of Miami limits.

## **Public and private sector**

### **AFFORDABLE WORKFORCE HOUSING**

#### Impediment FH5:

#### **There are not Enough Affordable/Workforce Housing Units to Meet the Needs of City Residents.**

It is well-known that the term affordable housing is no longer just a euphemism for low income families. Recent studies reveal that many low-and middle-class working citizens cannot afford to live in the communities where they live without being considered cost-burdened. The City of Miami's current housing market has been strongly influenced by a combination of real estate supply conditions occurring within the larger Miami-Dade market and by international demand factors that have contributed to the escalation of property values and sales and rental rates even when the area median income based on the most recent ACS stood at \$40,327. In 2018, the City hired the Jorge M. Perez Metropolitan Center at Florida International University (FIU) to prepare a draft Affordable Housing Master Plan, based on an analysis of the most up-to-date City demographic, economic and housing-related data, while making suggestions on how to create additional affordable/workforce housing options responsive to that data.

## Recommendations

- The City should continue to explore options to create workforce housing opportunities/incentives/bonuses to encourage private developers to build housing to serve these populations
- Identify opportunities for intergovernmental collaboration to address housing affordability issues. In particular, examine the most effective manner to partner with the County, State, and Federal governments to coordinate activities and leverage funding.
- Continue to support any efforts that can create a dedicated revenue source for the City's Affordable Housing Trust Fund. At this time, there is none.
- Workforce housing, currently defined in Miami 21 as those City of Miami households with incomes that range between 60% to 140% AMI with the Area Median Income being issued by HUD, should be studied and redefined. Presently, the category spans a very broad spectrum of income ranges. Even though the County's median income sits at around \$49,930, while the City's is \$40,327. That gap has concerned some City of Miami Commissioners who feel that the workforce definition needs to be adjusted to make sure that the incentive is helping the average City of Miami household.

## **FAIR HOUSING ENFORCEMENT**

### Impediment FH6:

#### **Housing Discrimination on the Basis of Race, Color, National Origin, Religion, Sex, Familial Status, and Disability continues to take place.**

According to HOPE, Inc. there were 256 fair housing inquiries/complaints over a 36 month-period that originated within City of Miami's boundaries. HUD research suggests that as much as 80 percent of housing discrimination goes unreported. As such, it is reasonable to conclude that there are many more cases of housing discrimination within the City of Miami that are left unreported.

## Recommendations

- Conduct fair housing testing at least twice within the span of this AI. Retest in areas where trends (i.e. geographic concentration of complaints by zip code) are identified in the monitoring process.
- Provide regular fair housing education and training to housing providers to ensure compliance with fair housing laws.
- Continue to collaborate with other organizations in fair housing training events.
- Track race and ethnicity of holders of Section 8 vouchers in order to identify any segregative patterns of where Section 8 vouchers are being used.
- Continue to implement a fair housing information campaign that specially targets City residents and clearly informs the public about fair housing rights.
- Continue to ensure that marketing materials (i.e. brochures, post cards, Public Service Announcements (PSAs), web site) are available in in the City's official languages (including Spanish and Creole); all material should specify where a resident should call to report a complaint. Use HUD developed collateral (i.e. print, radio, and television ads).
- Continue to include fair housing information during the Section 8 and HOPWA intake process and at the time of annual recertification.

- Continue to make fair housing collateral available in a variety of location (i.e. Neighborhood Enhancement Team (NET) offices, public places such as libraries, and/or social agencies).
- Conduct an annual/biennial public informational campaign during the Fair Housing Month each April.

## Other findings

The barriers listed below are beyond the scope of this plan, but were deemed important enough to mention as comments.

***State/local building codes increase the cost of affordable housing production:*** The South Florida Building Code is a series of standards and specifications designed to establish minimum safeguards in the construction of buildings to protect the health and safety of the public. Unfortunately, the more stringent building codes, especially in relation to hurricane-proofing, increase the costs of affordable housing production. The latter, combined with recent changes in costs tied to steel tariffs, also adds variable costs to the construction process.

***Davis-Bacon prevailing wages increase the cost of affordable housing:*** Davis-Bacon Prevailing Wages (Davis-Bacon Act of 1931) are triggered when federal dollars are used to pay housing construction or rehabilitation labor costs in multifamily projects with more than 11 units. This prevailing wage, which is usually higher than competitive wages, must be paid to laborers and mechanics. Additionally, federal paperwork requirements are extensive, amounting to an increase in staff time required for preparation on both the owner (developer/general contractor) and city sides, which also increases housing costs. While the objective of the prevailing wage requirements is to protect workers, developers often complain that the increased cost results in higher housing construction expenses. A cost analysis would be necessary to determine how much costs are truly impacted by the Davis-Bacon Prevailing Wage.

***Landlord-tenant issues*** – The Department, as well as the local FHIP mentioned in this document, receives numerous calls a year from tenants seeking assistance with landlord-tenant issues, which are spelled out in the Florida Statutes, Part II, Chapter 83, which is better known as the **Florida Residential Landlord Tenant Act**. Amongst the general public there seems to be a lack of awareness of these laws and how to work through disputes via the Court system and frequently constituents feel they are fair housing violations, even though the issue has nothing to do with a protected class. The Department routes these requests to Legal Services of South Florida given that most tenants cannot incur the costs of hiring a private attorney. The Department believes an awareness campaign – under the State’s purview – would make sense, especially in parts of the State with high amounts of foreign born persons/immigrants who are not as knowledgeable about landlord/tenant law.

***NIMBYism*** - As a large, high-density City, the Department generally does not experience public dissent to funded housing projects and/or NIMBYism (not in my backyard attitudes). Most of the community resistance seen in recent years has been in relation to historic preservation of certain City blocks/neighborhoods and/or potential disagreement in relation to proposed upzoning in particular areas of the City.

***Past credit problems*** - Credit problems lead to a person’s/family’s inability to secure a bank mortgage in order to purchase a home. When the City encounters persons/households who are dealing with this

matter and are attempting to purchase a home, the City refers them to local associations that offer low-cost credit counseling. The City (HCD) does not fund credit counseling services at this time.

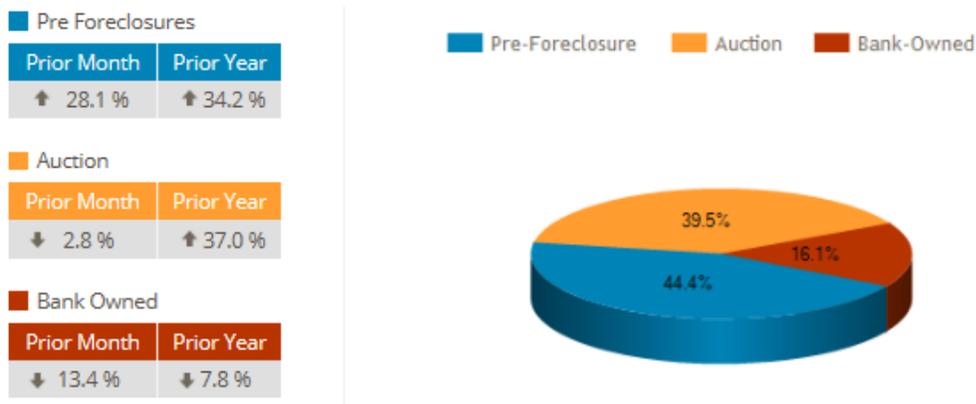
**Past criminal history** - Many LIHTC developments in Miami have strict criminal background policies which prohibit admission for persons who have been charged with a felony – with no restrictions as to how far back that charge goes. Sadly, this type of policy prevents ex-offenders – whose incident might have happened years ago -- from accessing publicly funded housing.

**Foreclosures** – According to RealtyTrac as of December 2019, there are 4,872 properties in some stage of foreclosure (default action or bank owned) while the homes listed for sale are 4,020. The number of properties that received a foreclosure filing was 7 percent higher than November 2019 and 26 percent higher than the same time in 2018.

### FORECLOSURE STATUS DISTRIBUTION FOR MIAMI, FL

December 2019

The current distribution of foreclosures based on the number of active foreclosure homes in Miami, FL.



**Property Insurance** – Recent reports indicate that Florida homeowners now pay more than double the national average for homeowners insurance, with coastal areas – including many parts of South Florida - - paying the highest rates. Data released in January 2019 by the National Association of Insurance Commissioners (NAIC) indicates that Florida’s average home owner’s insurance premium is \$1,993, the most expensive in the nation. The national average is \$1,192, making Florida’s average premium 67 percent higher. Combine this with flood insurance requirements, given that Florida is home to more flood insurance policies than any other state by a factor of three. Almost two million properties in the state carry flood insurance and one of every eight such policies in the *nation* covers a property in South Florida with an average premium of \$750 a year.<sup>15</sup> These costs are an additional burden to homeowners or to persons looking to purchase a home.

**Permitting process** - During numerous workshops held in 2019 towards the preparation of the FIU Affordable Housing Master Plan Draft, more than a dozen small and large developers expressed a genuine frustration with the stumbling blocks associated with the permitting process in the City, as well as the different levels of review needed to get projects approved – Building, Planning & Zoning, Fire, etc. Developers complained that the delays cost them money given the fluctuating costs of construction, labor,

<sup>15</sup> <https://www.wlrn.org/post/south-floridas-flood-maps-are-being-updated-will-you-get-hit-paying-insurance#stream/0>

etc., especially when dealing with affordable housing where the overall project cost simply cannot absorb unexpected additions to the bottom line (lot maintenance, taxes, water/sewage hook ups). In Oct. 2018, the City of Miami launched the ePlan (short for Electronic Plan Review) process to help digitize the Building/Permitting process in order to streamline it. Some developers feel the latter has helped matters, but also expressed an interest in the City considering a joint review of Plans, and a dedicated staff person that walks them through the process, especially for the small builders who cannot afford to keep a plan runner on the payroll.

**Property Taxes** - In Florida, real estate taxes are the primary source of government revenue. As mentioned elsewhere in this document, there is no state income tax. Obviously, tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. In 2019, the City of Miami had a millage rate of 7.5665. There were five other municipalities in Miami-Dade County with higher millage rates. The millage rates (also called tax rates) and taxes are determined by each of the taxing authorities such as Miami-Dade County, the School Board, City and Regional authorities. The Tax Collector -- part of Miami-Dade County's Finance Department -- collects current and delinquent real and personal property taxes, special assessments for all local taxing authorities, local business tax receipts and convention and tourist taxes.

The State of Florida offers some property tax relief in the form of Homestead Exemptions for qualifying homeowners. These are the Save Our Homes (SOH) exemption for homestead (primary) properties; the homestead exemption for persons 65 and older (also known as the senior exemption); and the exemption for civilian total and permanent disability; the deployed military exemption; the institutional exemption; and the widow/widower exemption. As required by state law, the Miami-Dade County Appraiser's Office determines the value of all properties as of the legal assessment date of Jan. 1 each year, these values are "established by nationally accepted valuation methods, which are sales comparison, cost, and income valuation approaches. Adjustments are made for size, condition and extra features of a property."

**Short term rental regulations** – After litigation with Airbnb in 2018, the City has not yet codified short term rental regulations. Although short term rentals can help a homeowner offset housing costs, an abundance of short term units in a touristic location such as Miami, could also inadvertently raise rents for residents by reducing the inventory of available housing stock (rental units) indirectly raising rents. Sometimes, short term rentals are also owned by persons who reside outside of the State and/or country and are difficult to track down, especially in relation to code enforcement issues and violations (party houses, illegal activities) affecting the quality of life of neighboring residents.

## Improvements since the Last AI

Approved in May 2010, the City of Miami's form-based Zoning code - Miami 21 - allows for varied residential types which reduces potential impediments to housing choice by members of the protected classes. The code did not include any inclusionary zoning regulations, neither voluntary nor mandatory but addressed affordable housing by offering an incentive-based approach in all T6 (urban core) areas of the city, allowing for bonus Building Height and FLR (floor lot ratio) in exchange for the developer's contribution to one of several specified programs that provide what are known as **public benefits** (Miami 21, Article 3, Section 3.14).

These specified programs are as follows (A through F):

A. **Affordable/workforce housing** -- the development project in a T6 zone may provide *any of the following or combination thereof*:

1. Affordable/Workforce housing on site of the development. For each square foot of Affordable/Workforce housing priced at or below eighty percent (80%) area median income (including pertaining shared space such as parking and circulation) provided on site, the development shall be allowed three (3) square feet of additional area up to the bonus Height and FLR as described in Section 3.14.1. For each square foot of Affordable/Workforce housing priced above eighty percent (80%) area median income (including pertaining shared space such as parking and circulation) provided on-site, the development shall be allowed an equivalent amount of development Floor Area up to the bonus Height and FLR as described in Section 3.14.1.
2. Affordable/Workforce housing off-site. For each square foot of affordable /workforce housing (including pertaining shared space such as parking and circulation) provided off site, in a location within the City approved by the City Manager, the development shall be allowed an equivalent square footage of additional area up to the bonus Height and FLR as described in Section 3.14.1. No additional allowance is given for the purchase of the site.
3. Trust Fund contributions. For a cash contribution to the Miami 21 Public Benefit Trust Fund, the development shall be allowed additional Floor Area up to the bonus Height and FLR described in Section 3.14.1. The cash contribution shall be determined based on a percentage of the market value of the per square foot price being charged for units at projects within the market area where the proposed project seeking the bonus is located. The calculation assumes a land value per saleable or rentable square foot within market area to equate to between 10 (ten) to 15 (fifteen) percent of market area's weighted average sales price per square foot. The cash contributions shall be adjusted on an annual basis to reflect market conditions effective October 1st of every year.

B. **Public parks, open space or park improvements**, the development project in a T6 zone may provide *any of the following or combination thereof*:

1. Public Park, or Open Space, provided through purchase and in an area of need identified by the City Parks and Open Space Master Plan and the City's Parks Department. In addition park improvements provided through donation for Public Parks with amenity levels that are Moderate or that Need Improvement as defined by the Parks Department Facilities' Assesment Report.
  - i. For each square foot of dedicated public Park or Open Space provided, the development shall be allowed two times the development Floor Area of provided land up to the bonus Height and FLR as described in Section 3.14.1. The Open Space may be a Park, Green or Square, as more fully described in Article 4, Table 7 of this Code.
  - ii. Park improvements shall be valuated and for said value the development project shall be allowed additional Floor Area up to the bonus Height and FLR described in Section 3.14.1 and shall for all applicable purposes be treated as a Trust Fund contribution pursuant to Section 3.14.4.b.(3).
  - iii. Park improvements for Public Parks in areas below 50% median income threshold shall be allowed two times the valuation credit.

- iv. Donations must meet all City requirements for design, equipment specifications, construction, warranties, etc. Park improvements are subject to review and approval by the City Manager or designee in accordance with Miami 21.
2. Public Open Space provided on-site in a location and of a design to be approved by the Planning Director. For each square foot of dedicated public Park or Open Space provided, the development shall be allowed an equivalent amount of development Floor Area up to the bonus Height and FLR as described in Section 3.14.1. The project shall maintain the Frontage requirements of the Transect Zone. The Open Space may be a Courtyard, Plaza, or Thoroughfare or Pedestrian Passage through the site connecting two (2) Thoroughfares, such as a segment of the Baywalk or FEC Greenway. See Article 4, Table 7.
  3. Trust Fund contribution. For a cash contribution to the Miami 21 Public Benefits Trust Fund, the development project shall be allowed additional Floor Area up to the bonus Height and FLR described in Section 3.14.1. The cash contribution shall be determined based on a percentage of the market value of the per square foot price being charged for units at projects within the market area where the proposed project seeking the bonus is located. The calculation assumes a land value per saleable or rentable square foot within market area to equate to between 10 (ten) to 15 (fifteen) percent of market area's weighted average sales price per square foot. The cash contributions shall be adjusted on an annual basis to reflect market conditions effective October 1st of every year.
- C. **Historic Preservation.** Bonus Floor Area to the maximum bonus Height and FLR as described in Section 3.14.1 shall be allowed for additional square footage qualified under the city Transfer of Development Rights program established in Chapter 23, City Code.
  - D. **Green Building.** In a T6 zone, additional Height and FLR shall be allowed for Buildings certified by the U.S. Green Building Council as Silver, Gold or Platinum.
  - E. **Brownfields.** One additional Story of Height shall be permitted for redevelopment on a Brownfield Site as defined in the Code.
  - F. **Civic space and Civil Support space.** For a development project in a T6 zone that donates a Civic space or Civil Support space on site to the City of Miami, an additional two square feet of area for each square foot of donated space, up to the bonus Height and FLR, shall be allowed.

As noted above, developers are provided with multiple options to acquire more buildable living/housing space. However, most **market-rate** developers (developing properties with absolutely no federal/state/and or local public subsidy) who are seeking to access the public benefits program forego the affordable/workforce housing routes described above and opt to comply using another of the delineated methods. The most popular public benefits option in the past few years has been the transfer of development rights.

Sections 3.15 and 3.16 of Miami 21 address the zoning incentives available to developers who opt to --

- As of March 2015, the City Commission passed an amendment to Ordinance #13114 by establishing a new zoning sub-classification known as T6-24(B) that will have a higher floor lot

ratio (16) and percentage (40%) of public benefits bonus. City administrators hope this will encourage the development of much-needed **workforce housing** (and concurrently, mixed income projects) in these specifically zoned urban areas which are near mass transit options and numerous employment opportunities. The Planning and Zoning Department is currently researching and working on how developers could apply for this benefit (specific requirements of the developer) on a sliding scale basis, and they will be presenting that recommendation at a future City Commission meeting. Other ways to earn the extra square footage would be for developers to agree to build public improvements like a landscaped bike path or a new playground in a park, provide public open space, green buildings, Brownfield site rehabilitation, and civic space or civil support space, or to make cash contributions to the Miami 21 Public Benefits Trust.

- The City of Miami Planning Department has been actively engaged in the development of a new zoning overlay, called a Neighborhood Revitalization District (NRD-1). The stated intent of this overlay district is to transition an industrial district into a mixed use, walkable neighborhood. A key component of the NRD-1 is a reduced parking requirement for residential units under 650 square feet, dropping from 1.5 per unit to 1 per unit, and allowing that one space to be paid into a parking trust fund in lieu of physically providing the space. This results in substantial cost savings for developers, and incentivizes small unit construction. These units are anticipated to be more affordable than the typical residential product currently being offered in the City of Miami.

Although these efforts are all favorable, the HCD feels that in light of the statistics highlighted in this AI specifically related to the cost-burden more and more City residents are facing (both renters and homeowners alike), the City must continue searching for creative solutions to expand the inventory/supply of housing available to low- and very-low income persons (50% AMI and below).

As mentioned, there are no inclusionary zoning policies in place in the City of Miami and the HCD continues to feel that finalizing some type of more aggressive, mandatory policy is a viable solution to further expanding the supply of affordable housing units, given that the demand for these particular units far outweighs the supply. However, the latter would have to fall within the parameters specified under Section 166.04151 of Florida Statutes, passed in July 2019 (known as HB 7103), which states that *“an inclusionary housing ordinance may require a developer to provide a specified number or percentage of affordable housing units to be included in a development or allow a developer to contribute to a housing fund or other alternatives in lieu of building the affordable housing units. However, in exchange, a county must provide incentives to fully offset all costs to the developer of its affordable housing contribution. Such incentives may include, but are not limited to: (a) Allowing the developer density or intensity bonus incentives or more floor space than allowed under the current or proposed future land use designation or zoning; (b) Reducing or waiving fees, such as impact fees or water and sewer charges; or (c) Granting other incentives.*

# CONCLUSIONS AND RECOMMENDATIONS

## Identified actions and timeline for recommendations

This chapter provides the City of Miami’s strategy to address fair housing from FY2020 to FY2024. In the first section, the City’s fair housing program’s strategy to maintain records to support the AFFH certification will be discussed. Afterwards, a table is provided that identifies the actions that the City plans to implement to overcome the impediments to fair housing choice which were identified in the previous chapter.

### **STRATEGY TO MAINTAIN RECORDS TO SUPPORT THE AFFIRMATIVE FURTHERING FAIR HOUSING (AFFH) CERTIFICATION**

The Department of Housing and Community Development is actively engaged in monitoring fair housing complaints that occur within the City of Miami as well as promoting and securing compliance with fair housing regulations. The City’s fair housing program is designed to affirmatively further fair housing objectives of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, as amended, and other relevant federal, state, and local fair housing laws.

- Monitoring of housing discrimination complaints received from residents of the City of Miami as compiled by HOPE, Inc. organized by basis, issues, disposition, and zip code. Such reports will allow the City to identify existent and/or emerging trends in fair housing.
- The City will continue to educate the general public through communication vehicles available to it on Fair Housing laws and rights, and how/where to report alleged discrimination.
- The City will continue to monitor housing developers with which it has contracts (federal, state assistance) to assure that they are following their signed AFHMP plans.

## Actions to overcome the impediments to fair housing choice

The following tables provide the action steps, timeline and measurable results that correspond to each recommendation. Please note that the action steps are intended to be implemented by the end of the calendar year referred to in the timeline.

<b>IMPEDIMENT FH1: Increased Housing (Cost) Burden for 55.8% of City households due to the rising costs of housing in the City of Miami combined with stagnant wages.</b>				
#	Recommendation	Action Steps	Timeline	Measurable Results
FH 1.1	Leverage Miami Forever Bond funding on a 20:80 ratio through an RFP process. For every dollar the City Invests it should get an average return of \$4 dollars from other public/private sources.	Issue a Miami Forever Bond RFP for Multi family development of affordable housing.	2020-2024	Acceptance of qualified proposals to develop affordable housing.
FH 1.2	Continue advocating for affordable and workforce housing development by engaging and informing City officials of the need to create additional housing opportunities for extremely low, very low, and low-to-moderate-income persons.	Discuss matter with elected officials and City administration whenever possible. Continue implementing actions to increase affordable housing as identified in the 2019-2023 Consolidated Plan and the recommendations of the draft Affordable Housing Master Plan.	2020-2024	Bringing additional affordable housing units for city residents
FH 1.3	Continue to fund the Single-Family Rehabilitation and Replacement programs to aid in preservation of homeownership, as well as the first-time homebuyer program to encourage new homeownership.	Continue marketing the Single Family Rehabilitation and Replacement programs as viable alternatives to maintain affordable housing in the city. Continue funding the down payment assistance program to provide additional affordable housing opportunities	2020-2024	Single Family Rehab: 10 Households; Down Payment Assistance: 40 Households

<b>IMPEDIMENT FH2: Very Few Multi-Family Buildings in the City Seek FHA approval</b>				
#	Recommendation	Action Steps	Timeline	Measurable Results
FH 2.1	Work with the Miami Realtors Association to further their efforts and address this issue on a local, state, and federal level.	Support and join the Miami Realtors Association's efforts to have more developments offer FHA units	2020-2024	Additional Multi-Family buildings in the City offering FHA units for sale
FH 2.2	Execute a direct mailing to multi-family condominium associations, with information on	Draft and develop marketing material	2020-2024	Mailing of marketing material; Departmental

	how to become an FHA approved building, including the Miami Realtors rack brochure on this topic.	Create a link in the department's website that provides more information on this topic for multi-family condo associations		website updated to reflect this information
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<b>IMPEDIMENT FH3: There is a scarcity of Developable Vacant Parcels in the City Diminishing the construction of new, single-family homes and/or smaller apartment developments thereby limiting housing choice.</b>				
#	Recommendation	Action Steps	Timeline	Measurable Results
FH 3.1	HCD to continue to manage a citywide Infill Program and will ensure that available city-owned parcels in that program are used for the provision of affordable housing.	Continue developing affordable housing units on city-owned vacant parcels;	2020-2024	Bringing additional affordable housing units to the market
FH 3.2	Support any viable efforts by the City's planning and zoning board in relation to amending the City's zoning code to encourage small-scale development, thereby expanding housing choice for all City residents.	Reach out to Miami-Dade County Water & Sewer Dept. (WASD) to work towards the creation of a program that offsets WASD hook-up costs that are passed onto developers.	2020-2024	Bringing additional affordable housing units to the market
FH 3.3	HCD to continue to prepare request for lien removals for eligible affordable housing properties	Have a dedicated staff person at HCD to expedite the review and approval of these lien removals.	2020-2024	Bringing additional affordable housing units to the market

<b>IMPEDIMENT FH4: There is a lack of adequate federal funding for rental assistance programs.</b>				
#	Recommendation	Action Steps	Timeline	Measurable Results
FH 4.1	HCD will continue to accommodate as many HOPWA clients as possible in the City's Tenant-Based Rental Assistance (TBRA) Program and to assist HIV+ persons who are income eligible via the HOPWA funded STRMU program (based on funding availability)	Continue to conduct rent comparables to ensure that rent paid corresponds to the on-going market rent. Educate clients about looking for more affordable rental options. Market the availability of the STRMU program	2020-2024	Continue marketing the STRMU program through the Miami-Dade HIV/AIDS Partnership and other proper channels.
FH 4.2	HCD will continue to fund private developers to build affordable housing units within the limits of the City of Miami. In return for the City funding a	HCD will continue to issue Request for Proposals to provide gap financing that will	2020-2024	Bringing additional affordable housing units to the market

	portion of the total cost of the project, the developer provides a pre-determined number of affordable rental housing units to be rented to low-to-moderate income families.	allow housing projects to include affordable housing units.		
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<b>IMPEDIMENT FH5: There are not Enough Affordable/Workforce Housing Units to Meet the Needs of City Residents</b>				
#	Recommendation	Action Steps	Timeline	Measurable Results
FH 5.1	The City should explore options to create workforce housing opportunities/incentives/bonuses to encourage private developers to build housing to serve the workforce (120% to 140%)	Continue discussions with City management and elected officials related to the development of affordable housing, inclusive of workforce housing options.	2020-2024	Bringing workforce housing units to the market
FH 5.2	Continue to support the creation and/or establishment of dedicated funding for the City's Affordable Housing Trust Fund (AHTF)	Continue advocating for city officials to consider having a % of the Public Benefit Trust Fund be distributed automatically to the Affordable Housing Trust Fund for housing development	2020-2024	Number of affordable housing units assisted with AHTF
FH 5.3	Identify opportunities for intergovernmental collaboration to address housing affordability issues. In particular, examine the most effective manner to partner with the County, State, and Federal governments to coordinate activities and leverage funding	Increase the level of collaboration between the city and the county. Specifically, improve coordination when it comes to funding opportunities	2020-2024	Bringing additional affordable housing units to the market
FH 5.4	Continue to implement the actions to increase affordable housing identified in the current Consolidated Plan	Implement affordable housing objectives identified in the 2019-2023 Consolidated Plan	2020-2024	Meet the goals and measurable results identified in the Consolidated Plan.

<b>IMPEDIMENT FH6: Housing Discrimination On The Basis Of Race, Color, National Origin, Religion, Sex, Familial Status, And Disability Continues.</b>				
#	Recommendation	Action Steps	Timeline	Measurable Results
FH 6.1	Continue fair housing rights campaign for City residents that will help them identify and challenge discrimination including material during the Section 8 and HOPWA TBRA programs intake/recertification processes	Update fair housing material to include the newest protected classes and disseminate the material to all city of Miami Section 8 HCV and HOPWA TBRA clients at time of intake/ recertification.	2020-2024	Approximately 420 Section 8 and 800 HOPWA TBRA clients receiving the newest fair housing material

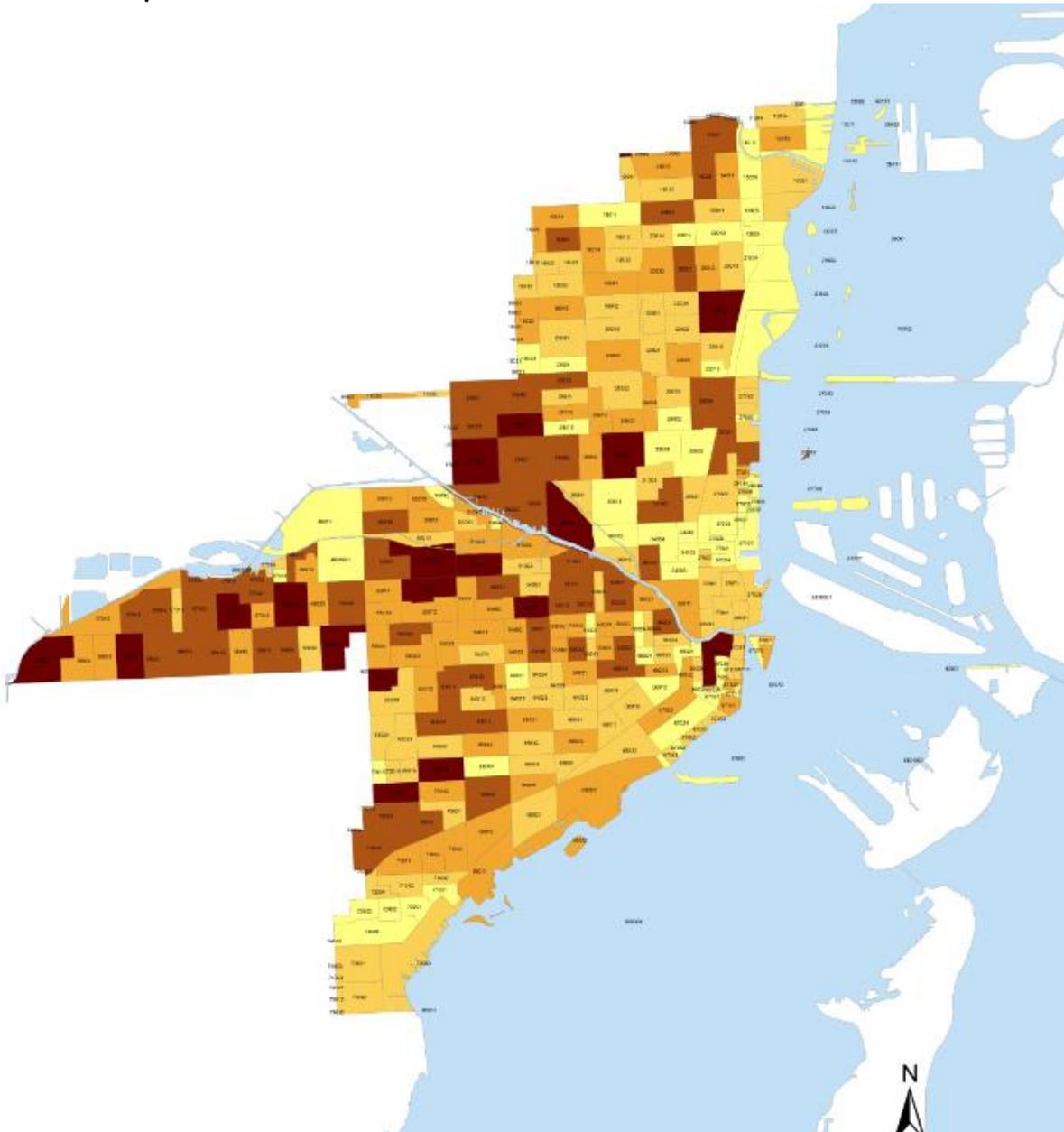
FH 6.2	Conduct fair housing testing at least twice within the span of this AI.	Contract the services of an agency to perform housing discrimination testing concentrating our efforts on multifamily rental properties	2020-2024	Testing results and follow up
FH 6.3	Continue to provide fair housing education and training to housing providers to ensure compliance with fair housing laws.	Organize/host community workshops for residents and developers or other target audience as deemed appropriate by the city.	2020-2024	A workshop a year hosted/led by HCD

# Appendix

## Attachment 1:

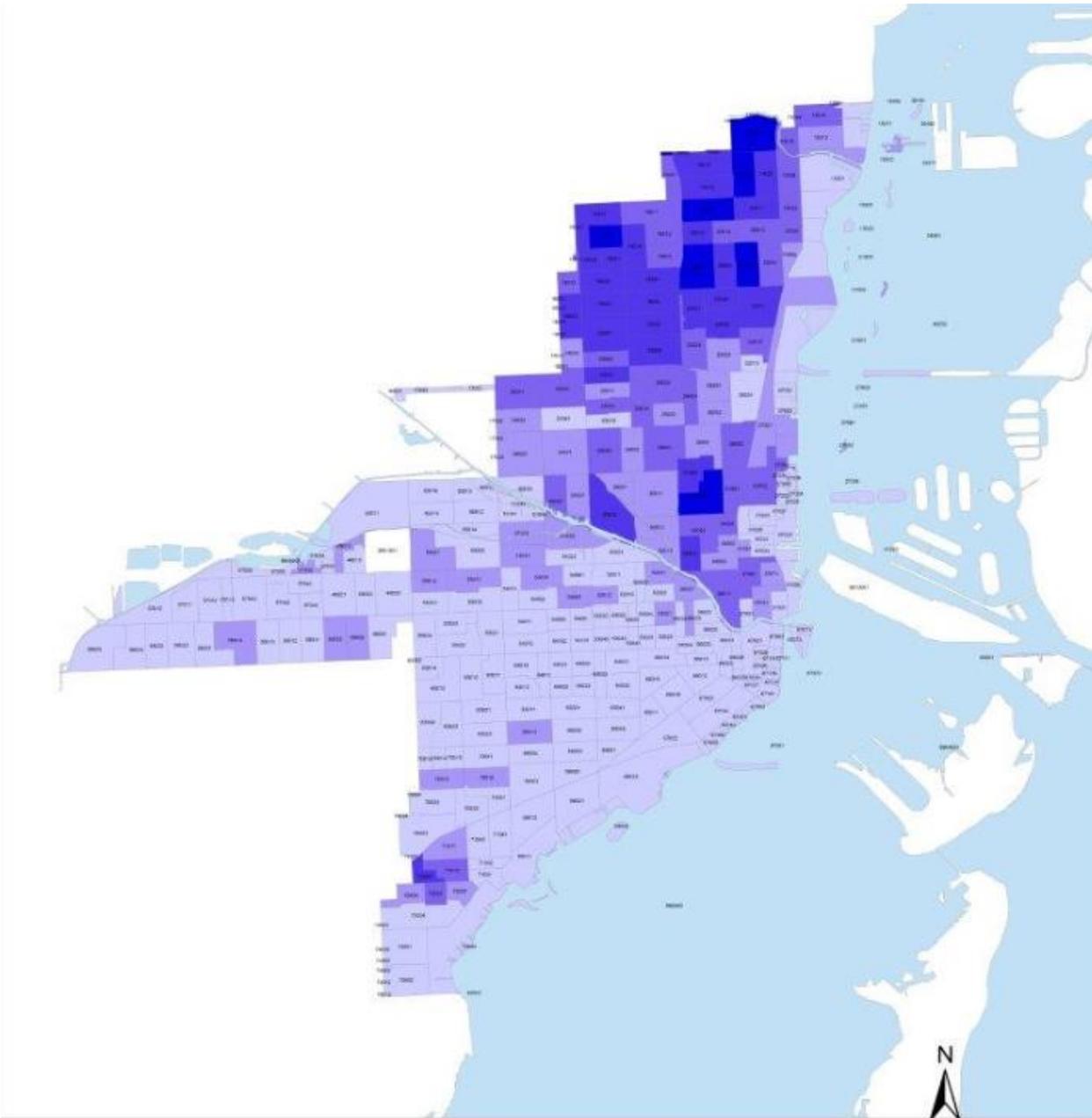
Geographical Information System (GIS) Maps based on U.S. Census analyzing different groups

**65 years old and up**



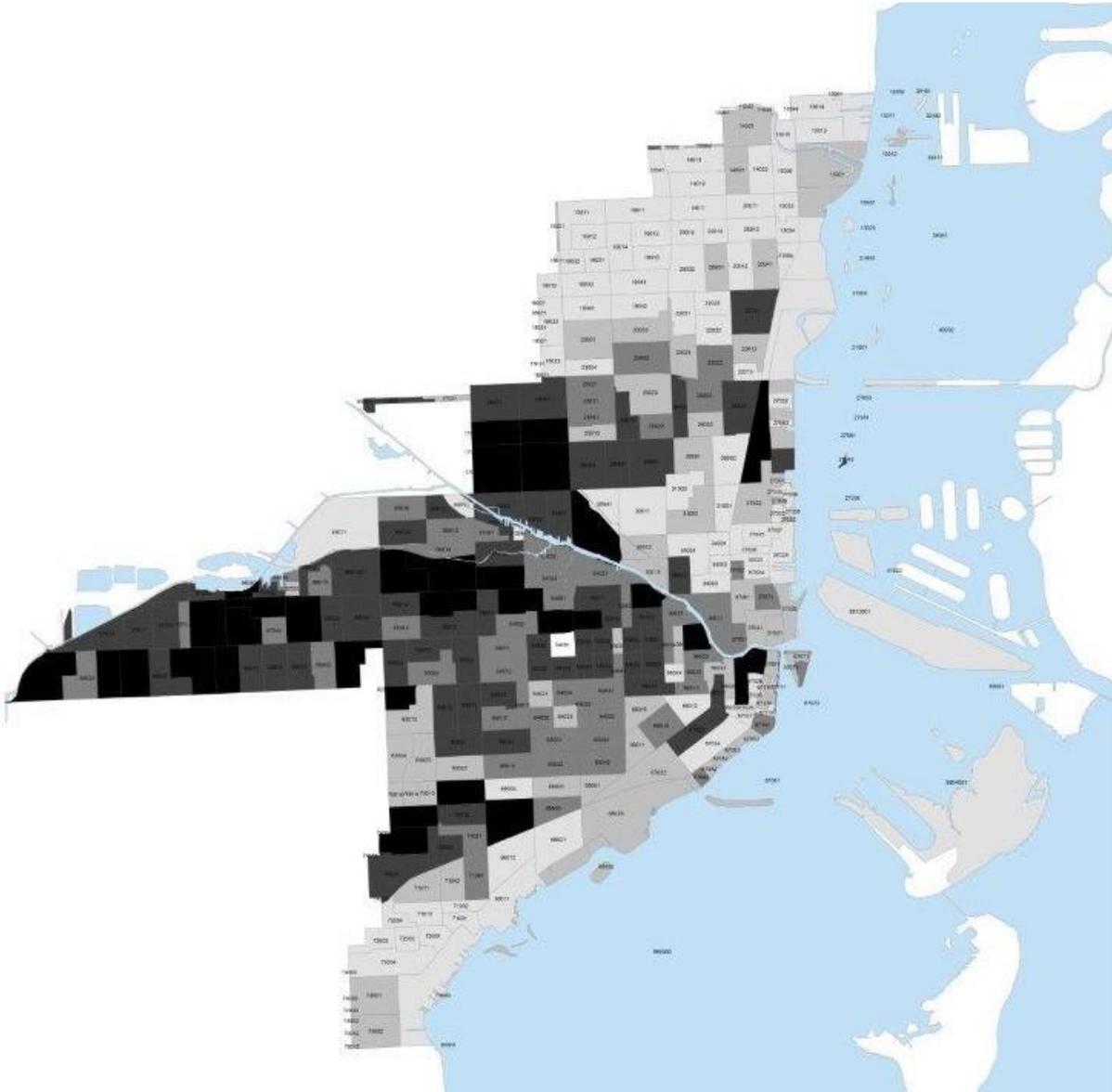
*Census Data: ACS 5-Year Estimates 2014-2018*

**Black Population**



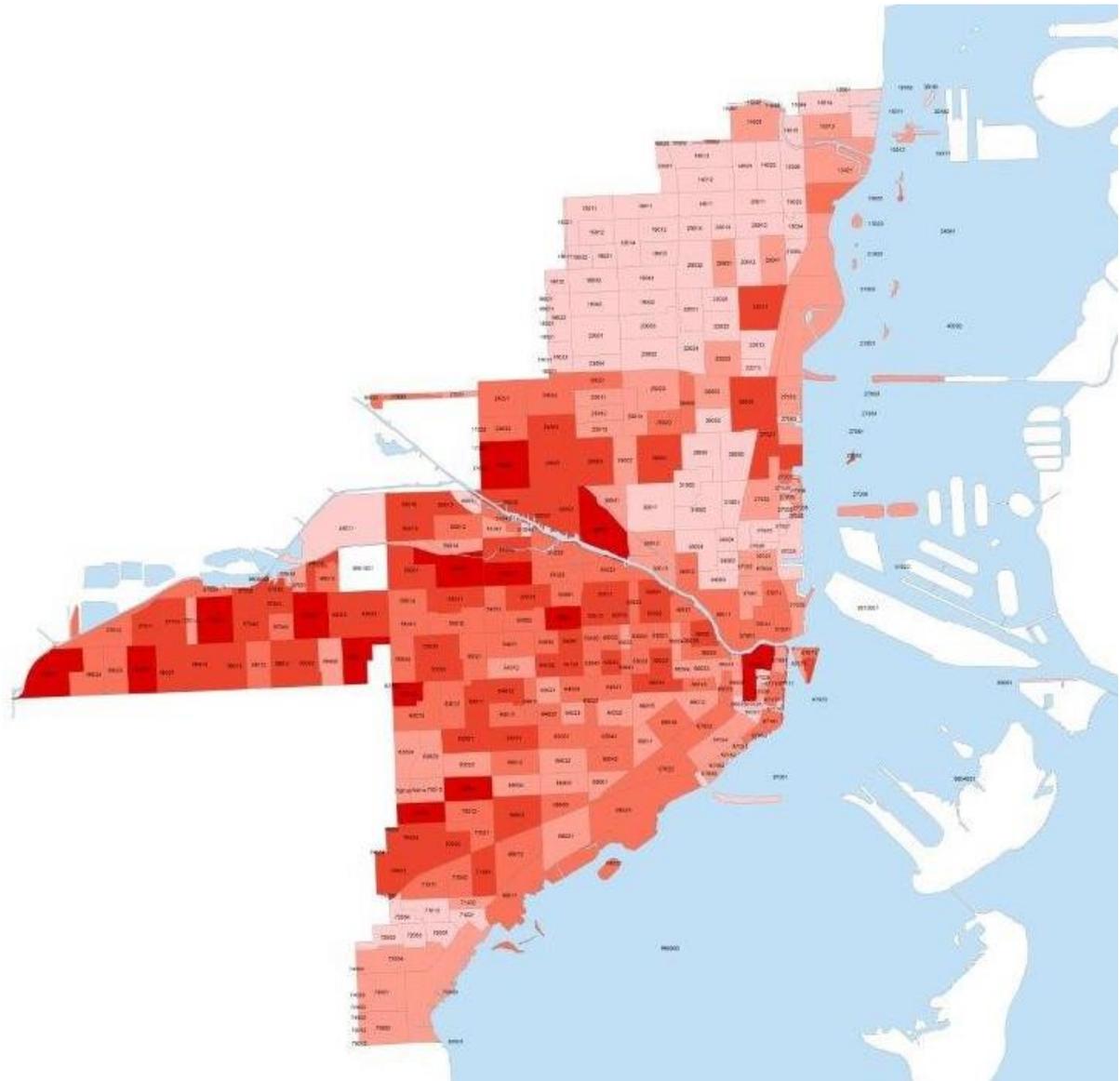
*Census Data: ACS 5-Year Estimates 2014-2018*

Hispanic Population



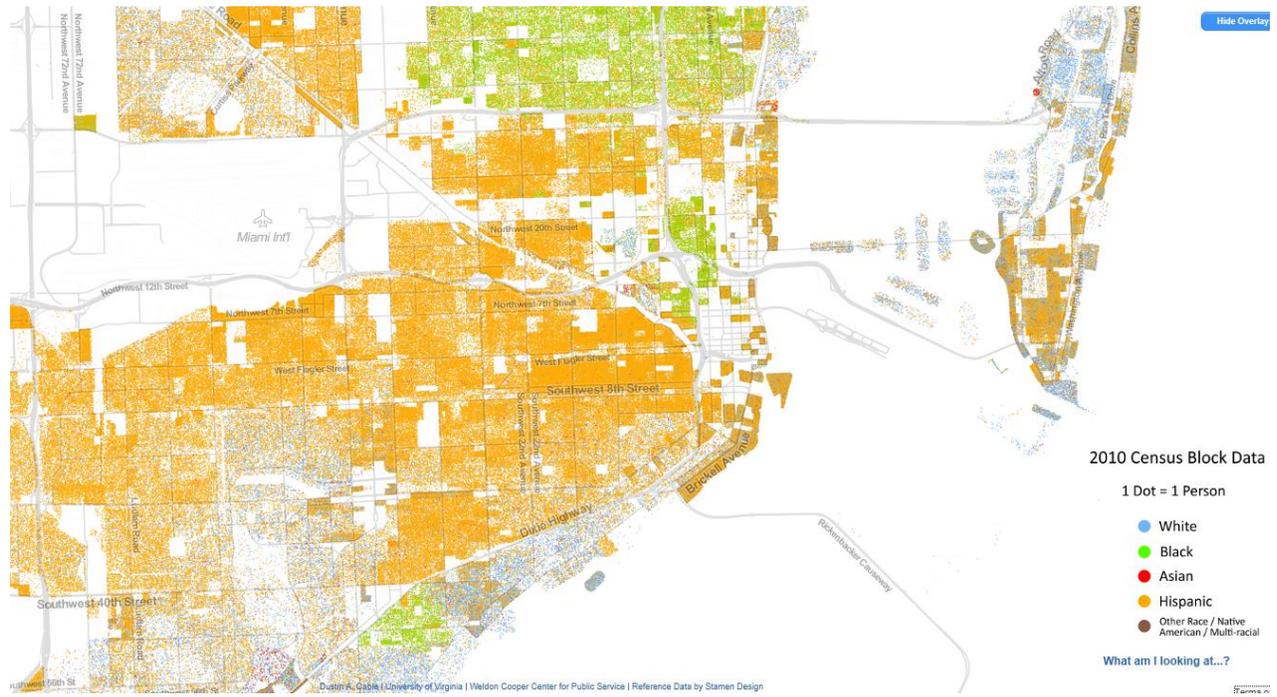
Census Data: ACS 5-Year Estimates 2014-2018

## White Population



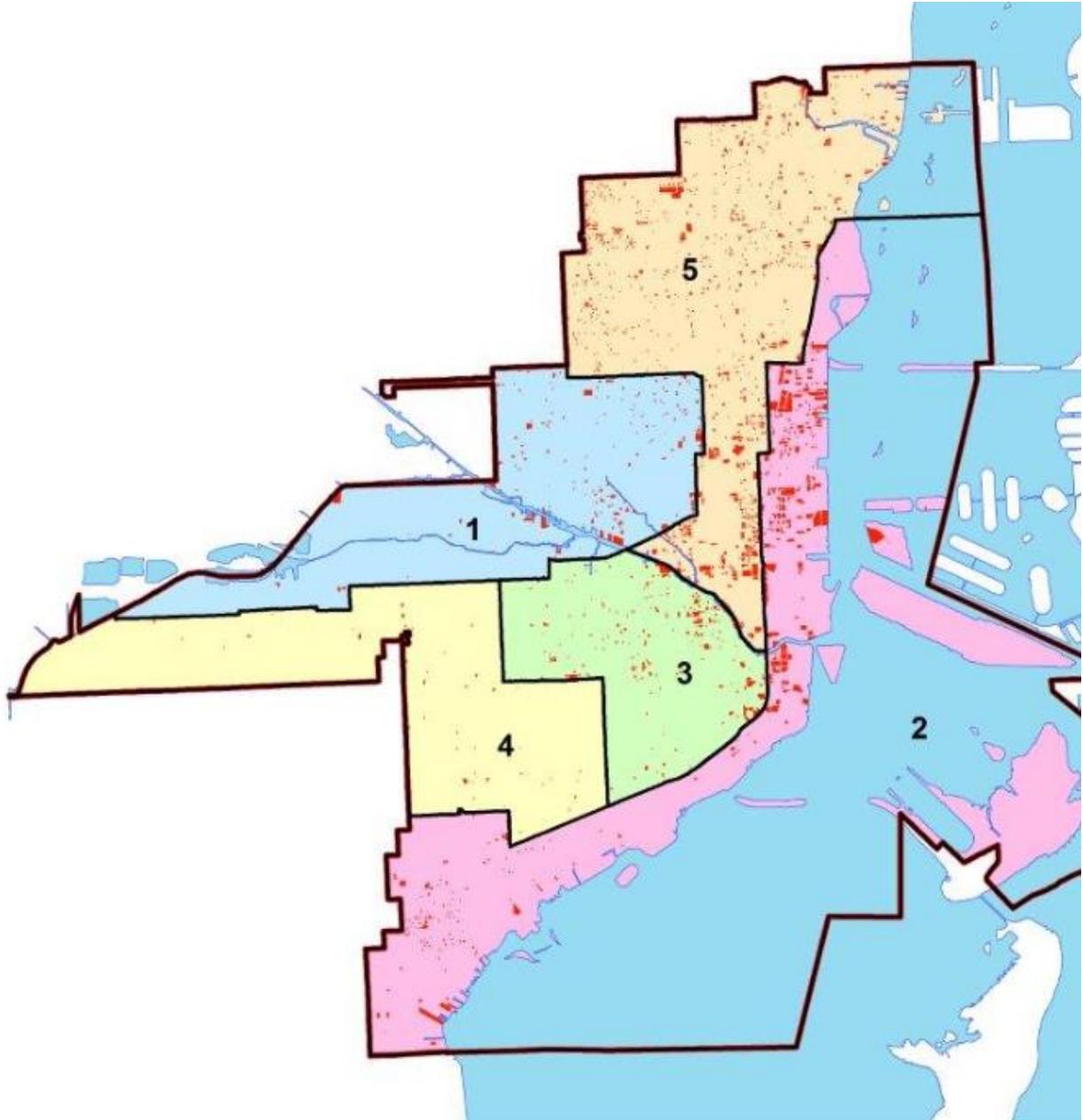
*Census Data: ACS 5-Year Estimates 2014-2018*

# Racial Dot Map



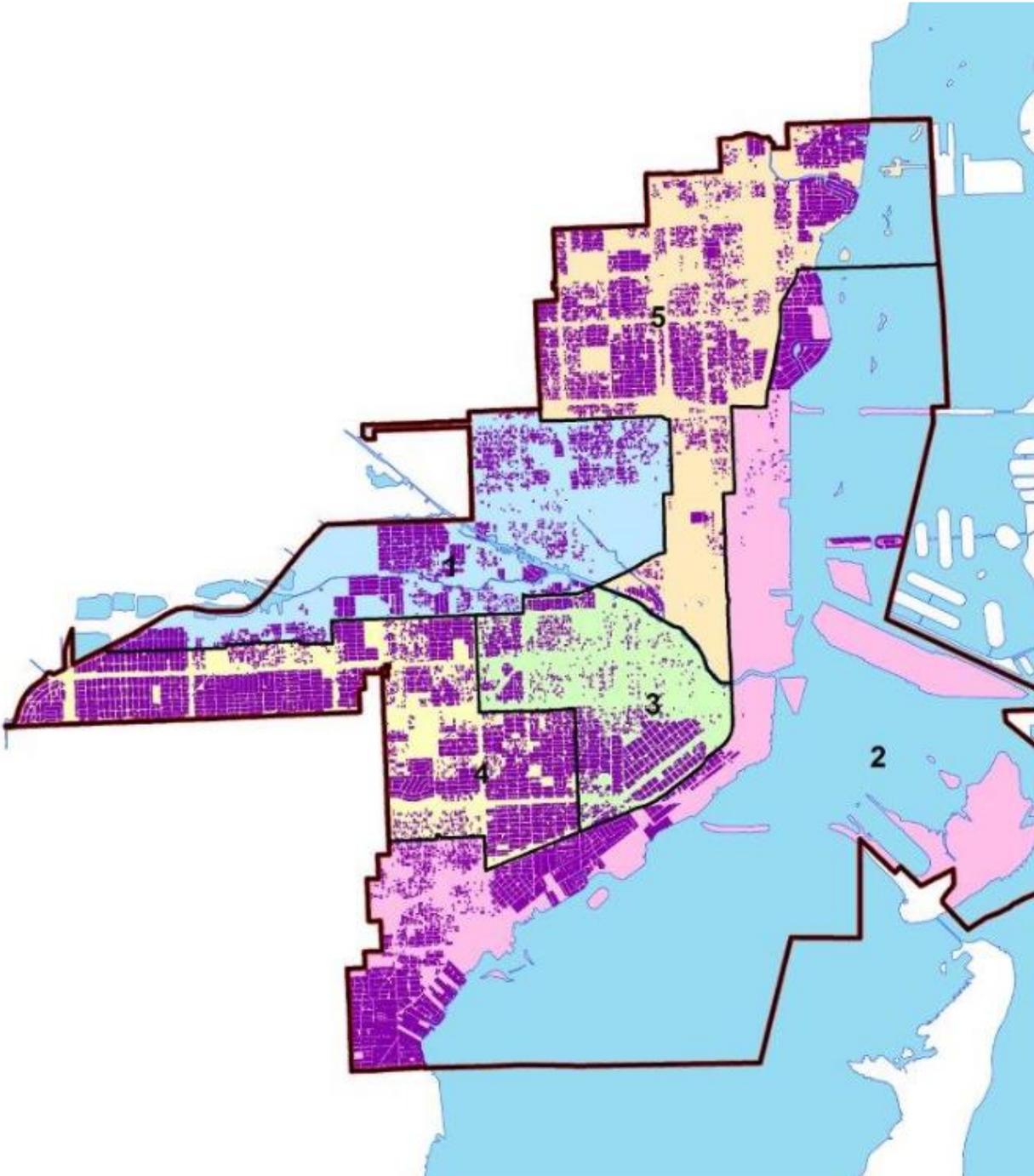
University of Virginia – Racial Dot Map (latest available)

Land Use Maps  
Vacant Properties



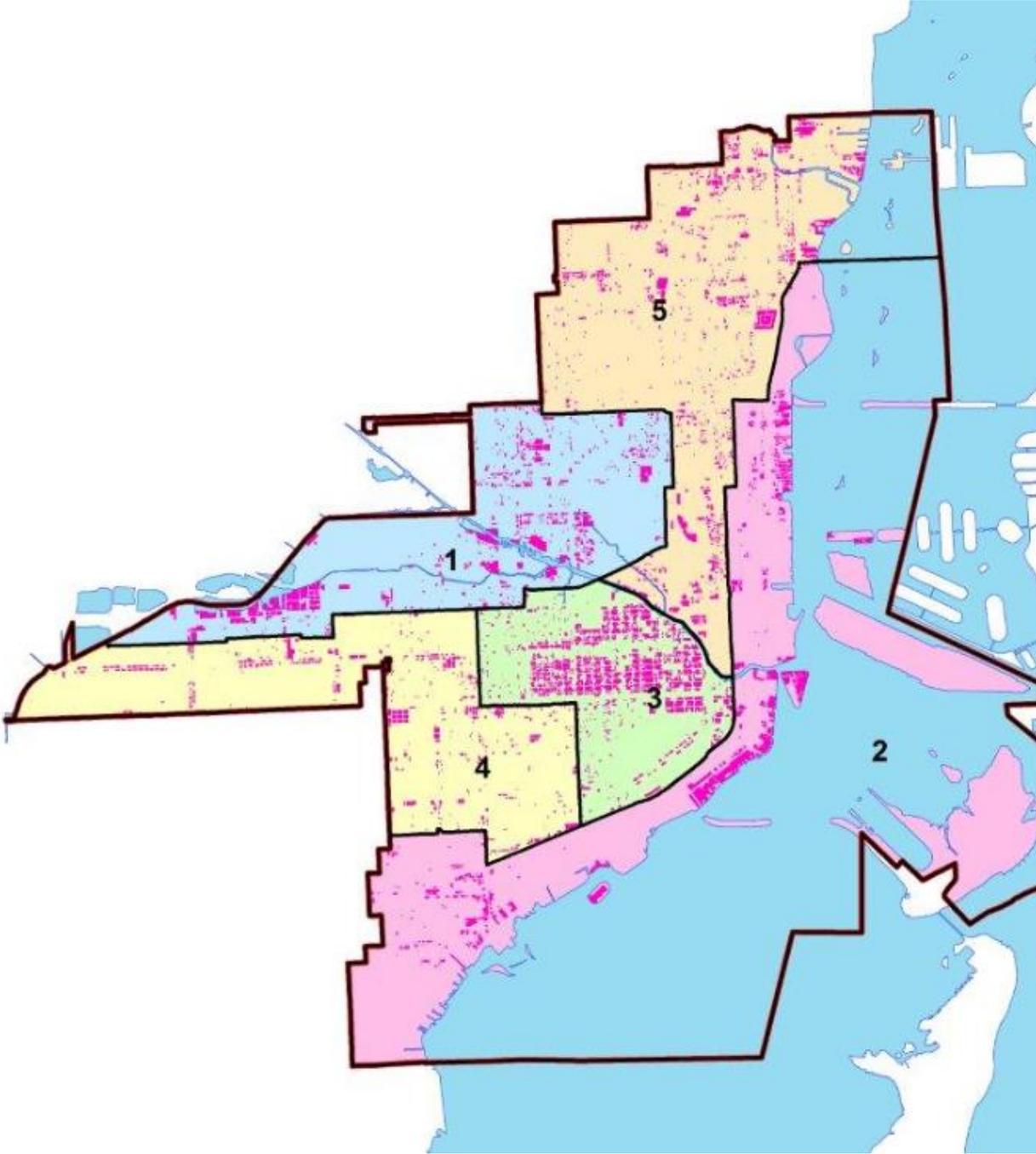
*City of Miami, Planning and Zoning Department*

Single Family Housing



City of Miami, Planning and Zoning Department

**Multi Family Housing**



*City of Miami, Planning and Zoning Department*

# Attachment 2:

## Affordable Housing Proclamations:



## Attachment 3:

*Spanish brief/translation about the main impediments identified in the DRAFT of the Analysis of Impediments to Fair Housing.*

### **¿QUÉ ES UN ANÁLISIS DE IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA EQUITATIVA? WHAT IS AN ANALYSIS OF IMPEDIMENTS (AI) TO FAIR HOUSING?**

El Análisis de Impedimentos para la Elección de Vivienda Equitativa (AI) revisa las políticas públicas y privadas, las prácticas y los procedimientos para identificar las posibles barreras a la elección de vivienda equitativa en una comunidad. El Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (conocido como HUD por sus siglas en inglés) requiere que los concesionarios locales que reciben subsidios federales, tales como la Ciudad de Miami, presenten una versión actualizada del AI cada cinco años como parte del proceso del Plan Consolidado del concesionario/la jurisdicción local. El AI sirve como base para la planificación de vivienda equitativa por el suministro de información sobre los obstáculos y las maneras de disminuir las barreras para finalmente promover la elección de vivienda equitativa en la ciudad de acuerdo a las leyes locales, estatales y federales sobre este mismo tema.

La Ciudad de Miami toma alrededor de un año en preparar un documento borrador tomando en cuenta las condiciones que HUD dicta y que deben incorporarse a todo AI. Estas condiciones son indicadas en un documento creado y transmitido por ellos (HUD) llamado el *Fair Housing Planning Guide*, accesible por Internet en la <http://www.hud.gov/offices/fheo/images/fhpg.pdf>. Tras analizar los datos más recientes distribuidos por la Oficina del Censo de los Estados Unidos y tras consultar con grupos locales tales como la Asociación local de agentes de bienes raíces, los administradores de la Ciudad, las organizaciones locales que se especializan en las leyes de vivienda equitativa, urbanizadores, arrendadores, y residentes, el borrador se prepara, se le avisa al público sobre la disponibilidad del borrador por medio de un anuncio en el periódico, extendiéndole al público en general 30 días para someter comentarios al borrador del AI. Todos los comentarios que se reciban serán incorporados a la versión final del AI, y este documento será presentado a la Comisión de la Ciudad para su consideración, cambios y/o aprobación antes de ser sometida a HUD para la evaluación final del documento.

**La ley federal de equidad de vivienda** (y sus modificaciones), prohíbe a través de la nación la discriminación en la venta, alquiler, y financiamiento de viviendas, y en otras transacciones relacionadas con la vivienda, basada en ●raza ●color ●nacionalidad ●religión ●sexo ●tipo de familia (por ejemplo, tener hijos) ●discapacidad

**Las leyes del estado de la Florida** proveen protecciones *adicionales* para ●personas embarazadas ●personas con VIH

**Las leyes locales del Condado Miami-Dade** proveen protecciones *adicionales* para ●edad ●linaje ●víctimas de violencia doméstica ●expresión de género y/o identidad ●estado civil ●orientación sexual ●fuente de ingresos

A continuación elaboramos sobre los ocho impedimentos (barreras) que hemos identificado en la Ciudad de Miami, tales como se describen en el borrador en inglés.

***Impedimento #1: Aproximadamente el 55.8% de los hogares de la Ciudad de Miami están viviendo con sobrecargos en gastos de vivienda dado a los costos crecientes para comprar y/o rentar viviendas dentro de la Ciudad, combinado con salarios locales estancados. HUD define a hogares viviendo con sobrecargos***

en gastos de vivienda como residentes – sean dueños de vivienda o inquilinos – que paguen más del 30% de sus ingresos hacia los gastos de vivienda

**Impedimento #2: Muy pocos edificios en la Ciudad de Miami se registran para ser aprobados para aceptar préstamos del Federal Housing Administration (FHA).** Los datos indican que en el mes de marzo del 2020, no hay ningún edificio en toda la Ciudad que están aprobados para aceptar préstamos FHA.

**Impedimento #3: Hay poca tierra vacante y disponible en la Ciudad para desarrollar la construcción de nuevas viviendas unifamiliares y/o edificios de apartamentos más pequeños (de menos unidades).** Esta deficiencia limita la variedad de viviendas que se encuentran en el mercado. Existe una escasez de tierra disponible para la construcción dentro de la Ciudad y muchas de las tierras que existen están dispersas en áreas empobrecidas. Una propiedad típicamente se puede desarrollar dentro de la Ciudad si el lote mide 5,000 pies cuadrados y puede también acomodar un mínimo de dos espacios de estacionamiento, tal como es requerido por los códigos de la Ciudad. La Ciudad tiene que considerar como la aplicación de regulaciones de zonificación y los requerimientos de estacionamiento pueden modificarse en zonas específicas para estimular el desarrollo de viviendas unifamiliares y de edificios más pequeños (de 20 unidades o menos), ya que muchos de los lotes vacantes son muy pequeños en tamaño.

**Impedimento #4: Hay una deficiencia (escasez) de fondos federales para administrar programas de asistencia para ayudar a pagar la renta.** La demanda para vales del Plan 8 en toda la comunidad de Miami-Dade, tanto como la demanda para viviendas públicas, es alarmante. Desafortunadamente, para las personas de bajos recursos que no hayan aplicado y/o que no hayan sido seleccionadas al azar para ninguna lista de espera, no existe ningún otro fondo público disponible para poder asistirlos con sus obligaciones de renta mensual. También, un estudio efectuado en el condado indica que hay aproximadamente 9,556 individuos viviendo con VIH+/SIDA en el Condado de Miami-Dade que necesitan ayuda con la vivienda.

**Impedimento #5: No hay suficiente viviendas costeables/de trabajadores para satisfacer la necesidad de los residentes de la Ciudad de Miami.** Estudios recientes relacionados al costo de la renta indican que muchas familias con ingresos medianos no pueden razonablemente pagar para vivir en las comunidades en donde trabajan. El mercado inmobiliario de la Ciudad de Miami ha sido seriamente afectado por factores de demanda que han contribuido hacia la escalación continua de rentas.

**Impedimento #6: La discriminación de vivienda a base de raza, color, nacionalidad, religión, sexo, estatus familiar y/o discapacidad existe y continúa ocurriendo.** De acuerdo a HOPE, Inc., una organización sin fines de lucro que monitorea las violaciones de equidad de vivienda a través de los Condados Miami-Dade y Broward, hubieron 256 consultas/quejas durante 36 meses, de personas que residen en códigos postales dentro de la Ciudad de Miami. Estas consultas/quejas representan aproximadamente 34% de las quejas totales recibidas y evaluadas por HOPE, Inc., a través del Condado Miami-Dade.

**¿Tiene comentarios, ideas, opiniones sobre posibles impedimentos?**

→ Si usted tiene comentarios que le gustaría entregar acerca de la información relatada en el borrador del **Análisis De Impedimentos Para La Elección De Vivienda Equitativa** de la Ciudad de Miami, por favor mande esos comentarios por escrito, incluyendo su nombre y apellido, y una forma de contactarlo

(número de teléfono o correo electrónico) a la atención de Roberto Tazoe, [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com), o por escrito a la siguiente dirección: City of Miami, Dept. of Housing & Community Development, 14 NE 1st Avenue, Second Floor, Miami, FL 33132.

**→Si usted siente haber sido discriminado(a) bajo una de las clases protegidas bajo la ley local, estatal o federal, a donde usted puede recurrir para presentar una queja?**

*Puede recurrir a UNA de las agencias indicadas aquí. Por favor tenga en cuenta que toda queja por discriminación de vivienda es revisada por un especialista de vivienda justa para determinar si en ella se alegan hechos que podrían violar la Ley de Equidad de Vivienda o la ley estatal o local sobre el mismo tema.*

**Local – Housing Opportunities Project for Excellence, Inc., HOPE, Inc.**

Miami-Dade Location  
Bill Thompson Building  
11501 NW 2 Ave.  
Miami, FL 33168  
Teléfono: 305-651-HOPE (4673)  
Fax: 305-759-2440  
Website: <http://www.hopefhc.com>

**Local - Condado Miami-Dade - Office of Human Rights and Fair Employment Practices**

Stephen P. Clark Center  
111 NW 1st Street 22nd Floor  
Miami, Florida 33128  
Teléfono: 305-375-2784  
Fax: 305-375-2114  
Correo electrónico: [OFEP@miamidade.gov](mailto:OFEP@miamidade.gov)

**Estatual – Comisión de Relaciones Humanas de le Florida**

2009 Apalachee Parkway  
Suite 200, Oakland Building  
Tallahassee, FL 32301-4857  
<http://FCHR.state.fl.us>  
Teléfono: 850-488-8170  
Correo de Voz: 1-800-342-8170

**Federal – El Departamento de Vivienda y**

Desarrollo Urbano de los Estados Unidos (HUD)  
Para someter una queja por Internet:  
[http://portal.hud.gov/hudportal/HUD?src=/topics/housing\\_discrimination](http://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination)  
Para más información sobre las leyes federales:  
[www.espanol.hud.gov/offices/ftheo/](http://www.espanol.hud.gov/offices/ftheo/)  
Teléfono (800)669-9777  
TTY (800)927-9275

# Attachment 4:

## Comments to Analysis of Impediments

**STAGE 1:** Due to COVID-19 pandemic, the public notice and review process for the Analysis of Impediments was amended following social distancing recommendations placed by the Centers for Disease Control and Prevention (CDC). As such a Virtual Public Hearing took place on July 2, 2020, which was broadcasted on Channel 77 with close captionings to comply with ADA requirements. Following HUD’s memorandum posted on April 1, 2020, titled “Availability of Waivers of Community Planing and Development (CPD) Grant Program and Consolidaed Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19”, the City posted its public notice on its website.

The following activities were carried out to ensure public participation at said hearings:

- Posting on City of Miami website, City’s public meetings webpage, and Housing and Community Development website;
- Advertised on the Miami Herald;
- Utilized the Neighborhood Enhancement Team (NET) Offices to advertise and market the public hearings to the local communities.

**STAGE 2:** On June 23, 2020, a public notice was posted on the City’s website, following HUD’s recommendation and COVID-19 public participation waivers, advising the public of the AI’s draft being available. It also noted the start date and the end date of the 30-day comment period and how to submit written comments. Residents had an opportunity to review and provide input for the draft AI. The same notice also advised the public of a second Public Hearing that took place on July 23, 2020 where residents had an additional opportunity to provide oral comments.

No comments were received during the Virtual Public Hearing nor the 30-day comment period.

# Public Notice - VPH for Analysis of Impediments 7-2-20 Posted 6-18-20

City of Miami  
VIRTUAL PUBLIC HEARING  
Analysis of Impediments to Fair  
Housing Choice (AI) FY2020-2024

The City of Miami Department of Housing and Community Development will conduct a Virtual Public Hearing (VPH) to receive citizen input on the City's Analysis of Impediments to Fair Housing Choice (AI) FY2020-2024. The VPH will be held on Thursday July 2<sup>nd</sup> at 2:30 PM.

The AI is a comprehensive review and assessment of the jurisdiction's laws, regulations, policies, procedures and practices, and how these affect the location, availability, and accessibility of housing. In addition, it analyses how conditions, both private and public, may affect fair housing choice. The AI will be presented to City Commission for approval on Thursday, July 23, 2020 at 3:00 p.m. (Public Hearing).

Staff from the Department of Housing and Community Development (HCD) will lead the meeting via video conferencing and will appear remotely. This VPH will be broadcasted live for members of the public and can be viewed on the City's website at [www.miamigov.com/tv](http://www.miamigov.com/tv), YouTube, and Comcast Channel 77 (closed-captioned, within the City of Miami). Live public comments may be submitted during the VPH at a terminal setup in the lobby at Miami City Hall located at 3500 Pan American Drive, Miami, FL 33133. Please bring a photo ID for entry into City Hall. Members of the public can also leave prerecorded phone comments by calling [305-250-5351](tel:305-250-5351) starting June 30<sup>th</sup>, 2020 at 8:00 AM until July 1<sup>st</sup>, 2020 at 5 PM. All prerecorded public comment will be played during the virtual meeting. Comments will also be collected through an online form that can be accessed at [www.miamigov.com/Government/Departments-Organizations/Housing-Community-Development/HCD-Virtual-Public-Analysis-of-Impediments](http://www.miamigov.com/Government/Departments-Organizations/Housing-Community-Development/HCD-Virtual-Public-Analysis-of-Impediments) The online form will be accessible starting June 30<sup>th</sup>, 2020 at 8:00 AM and will end during the VPH when HCD Staff closes the online form comment period.

In addition, draft copies of the Analysis of Impediments to Fair Housing Choice (AI) will be available for public review and comment for a period of no less than 30 days and may be obtained via email request to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com). The AI review and comment period commences on Tuesday, June 23, 2020, and ends on Wednesday, July 22, 2020. All comments must be submitted via email to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com). In accordance with the Americans with Disability Act of 1990, persons needing special accommodations to participate in this proceeding may contact HCD at [305-416-2080](tel:305-416-2080) no later than three (3) business days prior to the VPH. TTY users may call via 711 (Florida Relay Service) no later than three (3) business days prior to the VPH. Any inquiries concerning this meeting should be address to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com).

###

## Related Information

 [Ad31551AIPublicHearingAdvertisement6182020.pdf](#) (PDF, 130KB)

FROM PAGE 1A  
**BOLTON**

of soybeans and wheat in the electoral outcome.”

The book, “The Room Where It Happened,” was obtained by The New York Times in advance of its scheduled publication next Tuesday and has already become a political lightning rod in the thick of an election campaign and a No. 1 best-seller on Amazon.com even before it hits the bookstores.

The Justice Department asked a federal judge on Wednesday to immediately order Bolton to halt publication of his memoir, which has already been printed and distributed to booksellers around the country, saying that it contained classified information even as details emerged from it.

In a court filing, the Trump administration also urged the judge overseeing the lawsuit, Judge Royce C. Lamberth of the U.S. District Court for the District of Columbia, to declare that the potential restraining order it is seeking should bind the book’s publisher, Simon & Schuster, and bookstores from disseminating the book once they receive notice of it.

The Justice Department’s filing was a sharp escalation of a lawsuit it filed on Tuesday accusing Bolton of failing to complete the prepublication review process.

Trump’s critics have complained that Bolton should have come forward during the impeachment proceedings rather than save his account for a \$2 million book

contract.

While other books by journalists, lower-level former aides and even an anonymous senior official have revealed much about the Trump White House, Bolton’s volume is the first tell-all memoir by such a high-ranking official who participated in major foreign policy events and has a lifetime of conservative credentials. It is a withering portrait of a president ignorant of basic facts about the world, susceptible to flattery by authoritarian leaders manipulating him and prone to false statements, foul-mouthed eruptions and snap decisions that aides try to manage or reverse.

Trump did not seem to know, for example, that Britain is a nuclear power and asked if Finland is part of Russia, Bolton writes. He came closer to withdrawing the United States from NATO than previously known. Even top advisers who position themselves as unwaveringly loyal mock him behind his back. During Trump’s 2018 meeting with North Korea’s leader, according to the book, Secretary of State Mike Pompeo slipped Bolton a note disparaging the president, saying, “He is so full of shit.”

A month later, Bolton writes, Pompeo dismissed the president’s North Korea diplomacy, declaring that there was “zero probability of success.”

Intelligence briefings with



OLIVIER DOULIERY Abaca Press/TNS, file 2018

President Donald Trump, left, is ignorant of basic facts about the world and susceptible to flattery by authoritarian leaders manipulating him, John Bolton, right, writes.

the president were a waste of time “since much of the time was spent listening to Trump, rather than Trump listening to the briefers.”

Trump likes pitting staff members against one another, at one point telling Bolton that former Secretary of State Rex Tillerson had once referred to Nikki Haley, then the ambassador to the United Nations, by a sexist obscenity – an assertion Bolton seemed to doubt but found telling that the president would make it.

Trump said so many things that were wrong or false that Bolton in the book regularly includes phrases like “(the opposite of the truth)” following some quote from the president. And Trump in this telling has no overarching philosophy of governance or foreign policy but rather a series of gut-

driven instincts that sometimes mirrored Bolton’s but other times were, in his view, dangerous and reckless.

“His thinking was like an archipelago of dots (like individual real estate deals), leaving the rest of us to discern – or create – policy,” Bolton writes. “That had its pros and cons.”

Bolton thought Trump’s diplomatic flirtation with the likes of North Korea’s Kim Jong Un and President Vladimir Putin of Russia were ill-advised and even “foolish” and spent much of his tenure trying to stop the president from making what he deemed bad deals. He eventually resigned last September – Trump claimed he fired him – after they clashed over Iran, North Korea, Ukraine and a peace deal with the Taliban in Afghanistan.

Bolton, however, had nothing but scorn for the House Democrats who impeached Trump, saying they committed “impeachment malpractice” by limiting their inquiry to the Ukraine matter and moving too quickly for their own political reasons. Instead, he said they should have also looked at how Trump was willing to intervene in investigations into companies like Turkey’s Halkbank to curry favor with President Recep Tayyip Erdogan of Turkey or China’s ZTE to favor Xi.

Trump married politics with policy during a meeting with Xi on the sidelines of the Group of 20 summit meeting in Osaka, Japan, last summer, according to the book. Xi told Trump that unnamed political figures in the United States were trying to spark a new cold war with

China. “Trump immediately assumed Xi meant the Democrats,” Bolton writes. “Trump said approvingly that there was great hostility among the Democrats. He then, stunningly, turned the conversation to the coming U.S. presidential election, alluding to China’s economic capability to affect the ongoing campaigns, pleading with Xi to ensure he’d win.” Bolton says he would have printed Trump’s exact words, “but the government’s pre-publication review process has decided otherwise.”

Bolton does not say these are necessarily impeachable offenses and adds that he does not know everything that happened with regard to those episodes, but he reported them to Barr and Pat Cipollone, the White House counsel. They should have been investigated by the House, he said, and at the very least suggested abuses of a president’s duty to put the nation’s interests before his own.

“A president may not misuse the national government’s legitimate powers by defining his own personal interest as synonymous with the national interest, or by inventing pretexts to mask the pursuit of personal interest under the guise of national interest,” Bolton writes. “Had the House not focused solely on the Ukraine aspects of Trump’s confusion of his personal interests,” he adds, then “there might have been a greater chance to persuade others that ‘high crimes and misdemeanors’ had been perpetrated.”



DOUG MILLS The New York Times

President Donald Trump, above, said invading Venezuela would be ‘cool’ and that the South American nation was ‘really part of the United States,’ according to John Bolton’s account.

# Trump waffled on supporting Juan Guaidó, Bolton writes

BY ALEX DAUGHERTY  
adaugherty@mcclatchydc.com

WASHINGTON

A new book by President Donald Trump’s former national-security adviser says the president waffled on his decision to recognize Juan Guaidó as Venezuela’s legitimate leader over Nicolás Maduro within hours after the initial announcement went public in January 2019.

The forthcoming book by John Bolton, a high-ranking aide in multiple Republican presidencies whose hawkish foreign policy views in Latin America align with South Florida Republicans, presents the president as inconsistent on Venezuela policy in excerpts released Wednesday.

At one point, Trump said invading Venezuela would be “cool” and that the South American nation was “really part of the United States,” according to Bolton’s account.

But at other times, the book says, the president deviated from his administration’s headline rhetoric against Maduro in private.

According to Bolton, within 30 hours of the Trump administration’s public announcement backing Guaidó over Maduro, Trump referred to Guaidó as a “kid” compared to Maduro, who he

described as “tough.” “You couldn’t make this up,” Bolton writes.

Bolton also recounted that in a May 2019 phone call with Trump, Russian President Vladimir Putin compared Guaidó to 2016 Democratic presidential nominee Hillary Clinton. Bolton called the comparison a “brilliant display of Soviet-style propaganda” to shore up support for Venezuelan leader Nicolás Maduro by drawing parallels between Trump’s 2016 opponent and Venezuela’s National Assembly leader.

Putin’s claims, Bolton writes, “largely persuaded Trump.”

The Venezuela anecdotes were included in write-ups of Bolton’s forthcoming book by the Washington Post.

Also in the book, according to advance copies reviewed by the Post, New York Times and Wall Street Journal, Bolton says Trump asked Chinese President Xi Jinping to help him win the 2020 U.S. election.

The White House has dismissed Bolton’s claims and is suing Bolton in an attempt to prevent the book’s release, which is scheduled for June 23.

“I would just think that it’s very important to the nation’s security, not even the president himself, but for the presidency itself and the nation’s security to

make sure the review processes have been completed,” White House counsel or Kellyanne Conway said to reporters on Wednesday. “It’s kind of remarkable to have a book be published while people are still in office.”

Bolton was fired by Trump in September 2019 through the president’s Twitter account. “I disagreed strongly with many of his suggestions, as did others in the Administration, and therefore I asked John for his resignation, which was given to me this morning,” Trump tweeted.

Multiple Trump staffers have written books on the Trump presidency after leaving the White House. Democrats have criticized Bolton’s decision to publish a book instead of offering information to Congress that could have bolstered their case for Trump’s impeachment.

Bolton was a key voice on Venezuela policy during his White House tenure, dubbing Venezuela, Cuba and Nicaragua the “troika of tyranny” during a 2018 speech at the Freedom Tower in Miami.

His headline messaging on Latin America and a parade of sanctions against the Maduro regime buoyed the hopes of Miami Republicans who predicted that the Trump administration’s actions would lead to Maduro’s downfall.

A year and a half after the Trump administration recognized Guaidó, Maduro — who counts Russia, Cuba and Iran as allies — remains in power.

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202-383-6049,  
@alextdaugherty

## Public Notice

### APPLICATIONS FOR SPECIAL MAGISTRATES (ATTORNEY SPECIAL MAGISTRATES & APPRAISER SPECIAL MAGISTRATES)

Opportunities now exist for attorneys and tangible personal property/real estate appraisers who are licensed in the State of Florida to serve as Appraiser and Attorney Special Magistrates before the Miami-Dade County Value Adjustment Board for the 2020 property tax year. Candidates must meet the following criteria:

1. A Special Magistrate (hereinafter “SM”) cannot be an elected official, appointed official or an employee of Miami-Dade County, a taxing jurisdiction or the State of Florida.
2. During a tax year in which a SM serves, he or she must not represent any party before the board in any administrative review of property taxes.
3. A SM appointed to hear petitions regarding the valuation of real estate (including income producing properties) shall be a state certified real estate appraiser and must meet at least one of the following requirements: (a) must have at least five years of real property valuation experience and have received the Florida Department of Revenue’s (hereinafter “Department”) training, or (b) have at least three years of real valuation experience and have completed the Department’s training, including the exam. A real property valuation SM must be certified under Chapter 475, Part II, F.S. See Rule 12D-9.010(4)(d)2., F.A.C.
4. A SM appointed to hear petitions regarding the valuation of tangible personal property shall be a designated (either real or personal property designation) member of a nationally recognized appraiser’s organization of one of the following professional organizations: (a) Appraisal Institute (MAI Sr. only; SRPA & SREA designations), (b) American Society of Appraisers (Fellows & Sr. members only), (c) National Society of Real Estate Appraisers or (d) International Society of Appraisers; and must meet at least one of the following requirements: (a) must have at least five years of experience in tangible personal property valuation and have received the Florida Department of Revenue’s (hereinafter “Department”) training, or (b) have at least three years of experience in tangible personal property valuation and have completed the Department’s training, including the exam.
5. A SM appointed to hear petitions on exemptions, classifications, portability assessment difference transfers, changes in ownership under section 193.155(3), F.S., changes in ownership or control under section 193.1554(5) or 193.1555(5), F.S., or a qualifying improvement determination under section 193.1555(5), F.S., must have met one of the following requirements: (a) shall be a member of The Florida Bar with no less than five years experience in the area of ad valorem taxation and have received the Department’s training; or (b) be a member of the Florida Bar with no less than three years of experience in the area of ad valorem taxation and have completed the Department’s training, including the exam.
6. All applicants must be computer literate and sufficiently competent to enter their findings directly into the VAB computer system (i.e. after a brief training session).
7. SMs will be paid a flat fee of \$700.00 per 8 hour, daily hearing session.
8. All qualified applicants may be personally interviewed by the Board and/or its designee(s). Qualified individuals wishing to apply may obtain an application form and file same on or before 4:00 p.m. on July 31, 2020, to:

**VALUE ADJUSTMENT BOARD**  
**Stephen P. Clark Center**  
**111 N.W. 1st Street, Ste. 1720**  
**Miami, FL 33128-1981**  
**Attn: Roberto Alfaro, Manager**  
**Phone: (305) 375-5641**

For legal ads online, go to <http://legalads.miamidade.gov>

**City of Miami**  
**VIRTUAL PUBLIC HEARING**  
**Analysis of Impediments to Fair**  
**Housing Choice (AI) FY2020-2024**

The City of Miami Department of Housing and Community Development will conduct a Virtual Public Hearing (VPH) to receive citizen input on the City’s Analysis of Impediments to Fair Housing Choice (AI) FY2020-2024. **The VPH will be held on Thursday July 2<sup>nd</sup> at 2:30 PM.** The AI is a comprehensive review and assessment of the jurisdiction’s laws, regulations, policies, procedures and practices, and how these affect the location, availability, and accessibility of housing. In addition, it analyzes how conditions, both private and public, may affect fair housing choice. The AI will be presented to City Commission for approval on Thursday, July 23, 2020 at 9:00 a.m. (Public Hearing).

Staff from the Department of Housing and Community Development (HCD) will lead the meeting via video conferencing and will appear remotely. This VPH will be broadcasted live for members of the public and can be viewed on the City’s website at [www.miamigov.com/ty](http://www.miamigov.com/ty), YouTube, and Comcast Channel 77 (closed-captioned, within the City of Miami). Live public comments may be submitted during the VPH at a terminal setup in the lobby at Miami City Hall located at 3500 Pan American Drive, Miami, FL 33133. Please bring a photo ID for entry into City Hall. Members of the public can also leave prerecorded phone comments by calling 305-250-5351 starting June 30<sup>th</sup>, 2020 at 8:00 AM until July 1<sup>st</sup>, 2020 at 5 PM. All prerecorded public comment will be played during the virtual meeting. Comments will also be collected through an online form that can be accessed at [www.miamigov.com/Government/Departments-Organizations/Housing-Community-Development/HCD-Virtual-Public-Analysis-of-Impediments](http://www.miamigov.com/Government/Departments-Organizations/Housing-Community-Development/HCD-Virtual-Public-Analysis-of-Impediments). The online form will be accessible starting June 30<sup>th</sup>, 2020 at 8:00 AM and will end during the VPH when HCD Staff closes the online form comment period.

In addition, draft copies of the Analysis of Impediments to Fair Housing Choice (AI) will be available for public review and comment for a period of no less than 30 days and may be obtained via email request to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com). The AI review and comment period commences on Tuesday, June 23, 2020, and ends on Wednesday, July 22, 2020. All comments must be submitted via email to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com). In accordance with the Americans with Disability Act of 1990, persons needing special accommodations to participate in this proceeding may contact HCD at 305-416-2080 no later than three (3) business days prior to the VPH. TTY users may call via 711 (Florida Relay Service) no later than three (3) business days prior to the VPH. Any inquiries concerning this meeting should be addressed to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com).

**Ad#31551**



City of Miami  
VIRTUAL PUBLIC HEARING  
Analysis of Impediments to Fair  
Housing Choice (AI) FY2020-2024



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**Ad#31551**



**PUBLIC NOTICE AND NOTICE OF VIRTUAL PUBLIC HEARING  
PROPOSED CITY OF MIAMI  
ANNUAL ACTION PLAN FY 2020 AND ANALYSIS OF  
IMPEDIMENTS TO FAIR HOUSING CHOICE FY2020-2024**

As per the Code of Federal Regulations 24 CFR 91.200, the U.S. Department of Housing and Urban Development (HUD) requires entitlement communities that receive funds under its grant programs to prepare an annual Action Plan, which detail proposed activities to maximize the benefits of federal funding for low income residents and to provide citizens with reasonable notice of and an opportunity to comment on any new allocation and/or amendment of HUD programs. The City of Miami is required to report annually to HUD on projects funded through the Community Development Block Grant (CDBG); Home Investment Partnership (HOME); Emergency Solutions Grant (ESG), and Housing Opportunities for People with AIDS (HOPWA) programs.

The City of Miami Department of Housing and Community Development (HCD) has completed drafts of its annual Action Plan (AP) FY2020, and Analysis of Impediments to Fair Housing Choice (AI) FY2020-2024. The AP will be available for review and comment for a period of no less than 10 days in accordance to HUD waivers issued and applied for due to COVID-19. The review and comment period for the AP begins on **July 13, 2020** and ends on **July 22, 2020**. The 30-day review and comment period for the Analysis of Impediments to Fair Housing Choice (AI) FY2020-2024 began on June 23, 2020 and ends on July 22, 2020. The HCD will present these plans to City Commission on a Virtual Public Hearing that will take place on **Thursday, July 23, 2020 at 9:00 a.m.** for plan approvals and authorization to submit plans to HUD. The Public Hearing to provide the public an opportunity to comment on all plans will take place virtually via Zoom platform. You can visit <https://www.miamigov.com/Government/Public-Comment-Instructions-for-Virtual-Board-and-Committee-Meetings> two days prior to the meeting for instructions on how to live comments. These virtual hearings will be broadcast live for members of the public to view on Miami TV, YouTube or Comcast Channel 77 (closed-captioned, within the City of Miami).

The public is hereby advised of the new allocations to the funding of City programs. **The following are the allocations of Federal Funds for the annual Action Plan FY2020: CDBG: \$5,578,293; HOME: \$3,545,756; ESG: \$473,580; HOPWA: \$11,572,054.**

<b>Allocation of CDBG FY2020 PLUS Prior Year Program Income of \$99,820.80</b>	<b>Amount</b>	<b>Prior Year Program Income</b>
Program Administration	\$1,115,658.60	\$0.00
Public Services (COVID-19 Waiver)	\$2,174,636.20	\$99,820.80
Economic Development/ Sustainable Communities	\$2,287,998.20	\$0.00
<b>TOTAL</b>	<b>\$5,578,293.00</b>	<b>\$99,820.80</b>
<b>Allocation of HOME FY2020 PLUS Prior Year Unallocated Funds of \$4,000,000</b>	<b>Amount</b>	<b>Prior Year Unallocated</b>
Program Administration	\$886,439.00	\$0.00
Brick and Mortar Housing Construction for Affordable Rental and/or Homeownership units and/or Down payment Assistance	\$2,659,317.00	\$4,000,000.00
<b>TOTAL</b>	<b>\$3,545,756.00</b>	<b>\$4,000,000.00</b>
<b>Allocation of ESG for FY2020</b>	<b>Amount</b>	<b>Prior Year Unallocated</b>
Program Administration	\$35,518.50	\$0.00
Rapid Rehousing and Homeless Prevention Program	\$153,913.50	\$0.00
Homeless – Street Outreach	\$284,148.00	\$0.00
<b>TOTAL</b>	<b>\$473,580.00</b>	<b>\$0.00</b>
<b>Allocation of HOPWA for FY2020 PLUS Prior Year Unallocated Funds of \$2,000,000</b>	<b>Amount</b>	<b>Prior Year Unallocated</b>
Program Administration	\$347,161.62	\$0.00
Tenant Base and Rental Assistance Rental Payment	\$9,422,492.38	\$2,000,000.00
Tenant Based Rental Assistance Housing Specialist and Inspection	\$1,700,500.00	\$0.00
Project Based Program	\$81,900.00	\$0.00
Resource Identification	\$20,000.00	\$0.00
<b>TOTAL</b>	<b>\$11,572,054.00</b>	<b>\$2,000,000.00</b>

Copies of the Annual Action Plan and the Analysis of Impediments to Fair Housing Choice can be obtained via email request to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com). Comments to annual Action Plan FY2020 and Analysis of Impediments to Fair Housing Choice FY2020-2024 shall be submitted in writing and received prior to 7/22/2020, via email to [rtazoe@miamigov.com](mailto:rtazoe@miamigov.com), or mailed to 14 NE 1<sup>st</sup> Avenue, 2<sup>nd</sup> Floor, Miami FL 33132, Attn: **Roberto Tazoe**. Interested individuals are encouraged to attend the Virtual Public Hearing. Requests for special accommodations may be directed at 305-416-2080 no later than three (3) business days prior to the Public Hearing date.

**Disclaimer Related to Census Comparisons:**

**CAUTION:**

The Census Bureau cautions when comparing 2010 decennial census to American Community Survey data. Differences in the universe, question wording, residence rules, reference periods, and the way in which the data are tabulated can impact comparability with Census 2010.

The strength of the American Community Survey is in estimating characteristic distributions. We recommend users compare derived measures such as percent, mean, median, and rates rather than estimates of population totals.