

Chairwoman Raquel Regalado

County Infrastructure, Operations, and Innovations Committee

Board of County Commissioners

Miami-Dade County

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January 13th, 2022

RE: Vote NO on Agenda Item 2A

Dear Chairwoman Regalado,

The Hold the Line Coalition urges you and the other members of the County Infrastructure, Operations, and Innovations Committee (CIOIC) to vote no on Item 2A when it comes before you today. The resolution would amend the Comprehensive Development Master Plan (CDMP) to require the County to maintain a minimum 10-year land supply of single-family residential housing units in an amount consistent with a calculated estimate of demand, in addition to other changes.

Planning decisions must take a measured and long-term approach in order to preserve the long-term prosperity of the county as we grow to accommodate an increasing population. The CDMP, by design, provides the County with the flexibility to manage its growth according to established goals and priorities. This has been essential to balancing the demands of a growing population with other important considerations like affordable housing, public transportation, agriculture and the environment. To date, there have been no provisions in the CDMP stipulating that Miami-Dade County must provide a minimum supply of single-family housing or multi-family homes. Single-family housing currently occupies approximately 87 percent of our residential land area. In contrast, multi-family dwellings including townhomes represent only 6 percent of the county landscape, far below the average of 33% across 59 metro areas of greater than one million in population according to a [2020 IUPUI study](#).

The proposed resolution neither addresses housing affordability nor creates a mandate to address the shortage of multi-family housing. Countywide, the median sales price for single family homes is 40% higher than multi-family homes. A 2019 report published by the American Planning Association notes that “with the average cost per square foot for new construction in the \$150 to \$300 range (geography dependent), it is impossible to build a new 1,500-square-foot single-family house that is affordable to households earning the U.S. median income of \$57,652 (in 2017) without a public subsidy in the form of land, money, or both”. (Source: APA Housing Policy Guide. 2019)

If this resolution were approved as written it would likely put the County at an immediate deficit for single-family housing and codify suburban sprawl for the affluent without firm provisions to increase supply of affordable units. The fundamental problem with single-family residences, which are expected to be in a deficit by 2024, is that they take up a significant amount of available land suitable for other purposes. Insofar as we are struggling with an affordable housing crisis and plagues of heavy traffic, the most optimal solution would be for the County to

scale up densities along the SMART Plan Corridors and set targets to increase multi-family homes. To that end, the County would need to redevelop single-family units in these areas to implement transit supportive land uses that can make the most of the limited land supply we have. Having a concurrent need for new land to develop single-family residential would exacerbate the demand on our resources outside the Urban Development Boundary and impede the County's ability to pursue affordable multi-family residential and public transit development within the core of the County.

This amendment would also result in the conversion of additional agricultural land for single-family development. The Board recently commissioned a new study with University of Florida researchers for completion of a study assessing the economic trends related to agriculture in Miami-Dade County and determining the amount of land necessary to maintain an economically viable agricultural industry as directed by CDMP Policy LU-1R. Completion of the study, which should occur by next year, will provide a clearer picture of how the loss of agricultural land will affect the broader agricultural economy. Given that our information on the amount of agricultural land needed for a viable industry is from 2002 and therefore outdated, we are undoubtedly approaching the point where agriculture will become unviable and therefore should be prudent and wait for the updated information from the new study before we approve a policy that would create immediate pressure to develop an unspecified amount of agricultural land to meet the new requirement.

In conjunction with the agricultural study, the County should conduct a study to evaluate how demographic trends will affect demand for single family housing as older residents seek to downsize into smaller units or communal living arrangements. The impact of this shift will likely increase demand for more walkable living arrangements and access to reliable, affordable transit solutions, including for the mobility impaired, and should be included in a comprehensive vision for housing needs and land use. Meanwhile, the arrival of single younger workers could spur more demand for smaller units within a walkable urban core. As mentioned in the resolution, County staff should evaluate alternatives including repurposing land within the UDB, loosening restrictions on current single-family properties, and increasing density around transit before hastily pursuing more decisions that do not fundamentally address the supply issues across multiple housing segments.

Item 2A is inconsistent with the County's vision for a more resilient Miami-Dade, and the Board's commitment to Everglades and Biscayne Bay Restoration. We understand that new challenges arise as things change and for that reason, we do have a process to amend and update the CDMP. However, doing so outside of the Evaluation and Appraisal Report (EAR) process seems to be counter to the intent of the process. During an EAR cycle all stakeholders and cities weigh in on the direction the county should go, and we should rely on that data and input to help us make such far reaching decisions.

We agree studying how more single-family housing can be accommodated within the UDB is a good idea, however setting a 10-year supply minimum works at cross purposes with our CDMP and our stated county goals. We have a limited supply of land because we are wedged between two National Parks, and we have to face that reality by setting stringent restrictions and upholding them.

For the reasons previously stated, we appeal to you and the Committee to remove the 10 year supply requirement and direct the staff to bring back a suite of options for adoption that can lengthen the depletion time of the Single Family housing numbers instead.

Respectfully,

Laura Reynolds



Organizing Representative
Hold the Line Coalition

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