



June 6, 2023

Florida Housing Finance Corporation
c/o Jean Salmonsens
227 North Bronaugh Street, Suite 5000
Tallahassee, FL 32301

Via E-Mail: Jean.Salmonsens@floridahousing.org

Re: Ten North Group's Comments to RFA 2023-203 Housing Credit Financing for Affordable Housing Developments Located in Miami-Dade County

Dear Ms. Salmonsens,

At the recent Workshop, the Florida Housing Finance Corporation ("FHFC"), asked for stakeholders' feedback on RFA 2023-203 Housing Credit Financing for Affordable Housing Developments Located in Miami-Dade County. As a result of this request, Ten North Group (formerly Opa-locka Community Development Corporation, Inc.) is providing its feedback to FHFC. Ten North Group's comments are meant to address key issues which, if left unaddressed, will create a sense of discrimination and preferential treatment for the benefit of South Dade developments and neighborhoods, at the expense of projects and communities in Northern Miami-Dade County.

We have reviewed FHFC's 2023 Housing Credit Geographic RFAs Workshop Agenda for June 6, 2023, 2:00 p.m. (the "Agenda"). It is our understanding, looking at Page 16 of the Agenda, that it is the intent of FHFC to award three applications in Miami-Dade County. The three categories that FHFC is looking to award in Miami-Dade County are:

- a. one Family Application that qualifies for the Geographic Areas of Opportunity/SADDA Goal;
- b. one Elderly (Non-ALF) Application; and
- c. one Application that qualifies for the Urban Center/MetroRail Station Designation.

Our comments as to each category are as follows.

Geographic Areas of Opportunity/SADDA Goal

FHFC is being asked by the Coalition of Affordable Housing Providers of Florida, Inc. (“CAHP”) to expand the Family Geographic Area of Opportunity/SADDA Goal to recognize Transit Oriented Development (“TOD”) Areas located within a ½ mile radius around Metrorail Stations and around the 14 Bus Rapid Transit (“BRT”) stops that are being renovated along the South Dade Transitway.

This requested change is problematic because it makes no mention of treating Tri-Rail Stations as TODs, even though Tri-Rail connects to Miami-Dade’s Metrorail and Express Bus systems, enabling millions of commuters to travel all the way from Palm Beach to Florida City.¹ Even more troubling, the exclusion of Tri-Rail from the requested change hurts mostly working classes and ethnic communities around the Golden Glades Transit Hub, the last stop North for Tri-Rail in Miami-Dade County,² which connects riders from West Palm Beach, Broward and Northern Miami Dade, serving millions. It also hurts TODs such as the City of Opa-locka’s TOD District created around its Tri-Rail Station.

Ms. Salmonsens, Opa-locka has worked hard to address the affordable housing needs of its residents by creating a model Transit Oriented District around the Opa-locka Tri-Rail station. The City of Opa-locka has created a detailed and thoughtful Sustainable Opa-locka, 20/30 Comprehensive Plan.³ Also, the selection of BRT stations, all in the South Dade

¹ See Exhibit “A” hereto.

² The City of Opa-locka, along with the City of Miami Gardens, and the City of North Miami, are three cities whose borders connect to the Golden Glades Tri-Rail Station.

³ The City of Opa-locka’s Sustainable Opa-locka, 20/30 Comprehensive Plan can be found at: <https://opalockafl.gov/DocumentCenter/View/1342/Sustainable-Opa-Comp-Plan?bidId=> On the issue of Transit Oriented Development, the City of Opa-locka’s Comprehensive Plan reads as follows:

“OBJECTIVE LU-2: The area designated Downtown Mixed Use on the 2030 Future Land Use Map (FLU-1) shall be redeveloped as a high quality, design-unified, mixed-use transit-oriented downtown for Opa-Locka. Monitoring Measure(s):

1. At least three mixed use development and redevelopment projects and/or Transit Oriented Development projects in the Downtown Mixed-Use District between 2015 and 2030.

Notes: The implementation of mixed-use development and redevelopment projects and Transit Oriented Development as allowed by and provided for in the Plan, is an important component in the City’s vision for its development and redevelopment. The “at least three projects” standard balances realistic expectations and fiscal constraints with the need for enough redevelopment projects to have a significant impact in implementing the redevelopment vision

Transitway, is discriminatory because it excludes the 95 Express Broward-Miami Dade, which is a much older transitway and which serves many more communities.

In addition, the requested change is problematic because it raises the fundamental question of fairness. If approved without including Tri-Rail Stations, the requested change would give preferential treatment to 9% tax credit projects in the Southern part of the County, while wholly excluding developments in the Northern part of the County. In other words, rather than treating all transit-oriented developments in the same manner, the requested change hurts the Northern part of the County which is not part of the BRT, hurts the communities around the Golden Glades Transit Hub, and hurts cities like the City of Opa-locka which is seeking to maximize TODs for the benefit of its residents.

Thus, if the Family Geographic Area of Opportunity/SADDA Goal is to be expanded to include TODs, *all* TODs – whether they be near the BRT, Metrorail, or Tri-Rail – should be included. This would be the only fair and egalitarian approach. Conversely, if the proposed language that has been presented to FHFC to expand the Family Geographic Area of Opportunity/SADDA Goal is accepted without adding Tri-Rail, it would represent a housing discrimination policy reminiscent of an era we have thought never to see again.

Urban Center/Metrorail Station Designation

FHFC's Urban Center definition (Proposed Rules: Page 8), uses "Tiers" and prioritizes "Tier 1" Urban Centers, all except one of which are located in South Miami-Dade.⁴

By these means, Urban Centers in the Northern part of the County such as Opa-locka, Miami Gardens, and Hialeah are being geographically excluded. This geographic exclusion has the result of also being racially discriminatory. The unfairness of this situation emerges when one considers that Miami Gardens has a population of 105,457, making it the third largest city in Miami-Dade County (after Miami and Hialeah). Miami Gardens is over 66% Black/African American and over 30% Hispanic. Why should developments in Miami Gardens not have the same opportunity as the "Tier 1" Urban Centers, to compete for funding? The determination to hand-select an Urban Center using "Tiers" excluding thereby neighborhoods in the North of the County does not reflect the values, equal rights, and fairness that are the cornerstones of our county and state.

We therefore ask that FHFC be faithful to values of justice and equity, eliminate all references to "Tiers," and treat all Urban Centers in the same, even-handed manner.

The Urban Center/Metrorail Station Designation is also problematic in that, at Page 8 of the Agenda, FHFC states that "to qualify for the Metrorail Station Designation," all the

for the Downtown District."

(Sustainable Opa-locka, 20/30 Comprehensive Plan at page 11.)

⁴ The Tier 1 Urban Centers are defined as: Ojus, Downtown Kendall, Cutler Ridge, Goulds, Perrine, Princeton, and, if proposing an Elderly Development, Naranja.

following qualifications must be met:

- Question 5.h.(2) of Exhibit A must reflect “Yes”, ***and the named Metrorail Station must reflect Allapattah, Civic Center, Coconut Grove, Douglas Road, or Vizcaya;*** and,
- The Application must achieve a minimum of 5 Proximity Points based on the proximity to a Public Rail Station.

The determination to give priority to certain Metrorail Stations is problematic for two reasons. First, all Metrorail Stations located North of the Allapattah Station are excluded. Hence, Miami-Dade County residents living in cities that are served by the Palmetto, Okeechobee, Hialeah, Tri-Rail, Northside, Dr. Martin Luther King, Jr., Plaza, Brownsville, and Earlington Heights Stations are being completely excluded. Furthermore, as amply explained above, the decision to focus solely on Metrorail Stations wholly excludes Tri-Rail Stations and the older 95 Express Broward-Miami Dade, discriminating against and leaving out neighborhoods and cities in the Northern part of Miami-Dade County.

We therefore ask that the Metrorail Station Designations be revised to include ***all Metrorail Stations located within Miami-Dade County, and also to include all Tri-Rail Stations, and the entire express bus system (whether it be the BRT or the 95 Express Broward-Miami Dade).***

Elderly (Non-ALF) Application

As set forth above, the definition of Tier 1 Urban Centers singles out Elderly Developments in Naranja, for favorable treatment. We ask that all proposed Elderly (Non-ALF) projects be treated the same.

Conclusion

We ask that you consider the objective issues raised in this correspondence because we believe that failure to do so would only perpetuate the feeling of exclusion and discrimination working classes and ethnic communities of the Northern part of the County such as Opa-locka, have experienced both historically and currently.

Please do not hesitate to contact me should you have any questions or need more information regarding the foregoing.

Very truly yours,



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Ten North Group (formerly OLCDC)
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Exhibit "A"

