AFFORDABLE HOUSING NEEDS & STRATEGY:

A REPORT ON PLANNED TRCL STATIONS IN SOUTH FLORIDA

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Overview

As Florida enters an increasingly urbanized and interconnected way of life, regional planning is critical to the long-term success of our neighborhoods, cities, and metropolitan regions. Central to this planning is development of public transportation and transit-oriented development. The South Florida Regional Transportation Authority (SFRTA) and the South Florida Regional Planning Council (SFRPC) commissioned this report to develop a comprehensive review of affordable housing demand in proposed Tri-Rail Coastal Link (TRCL) stations in southeast Florida. The report then details a set of strategies for promoting, preserving, and developing affordable housing in each station area.

There is no region in Florida with more pressing need for thoughtful, proactive planning than the southeast Florida metropolis of Palm Beach, Broward, and Miami-Dade counties. Policymakers must have a plan in place to bolster the supply of affordable housing and prevent displacement of existing residents. Without an effective approach to addressing existing and projected affordable housing needs, the region's goals for inclusivity and economic dynamism exemplified in the TRCL vision will be crushed by rising housing costs and marginalized populations.

This study offers a quantitative approach to identifying strategies for developing or preserving affordable housing in TRCL station areas. The study uses two data indices to:

1) Determine the degree to which each station area experienced increased housing costs between 2010 and 2017,
2) Determine the degree to which residents living in each station area are vulnerable to displacement assuming housing costs continue to rise, through natural market forces or through development of TRCL commuter rail.

The study then estimates existing affordable housing demand by tenure type in each station, and projects housing supply and demand in 2025.

In addition to detailing existing and projected affordable housing demand in station areas, this study offers a set of strategies that could be deployed in each station to either preserve or promote affordable housing. A discussion of each strategy includes national and local models, factors to consider for implementation, and an overview. Finally, to assist policymakers in southeast Florida in adopting housing strategies, two stations are reviewed and analyzed in-depth.

Summary of findings

- Housing demand varies considerably from station to station. Some stations have a sufficient supply of naturally occurring affordable housing, while others face a serious shortage.
- Extremely low-income renter households (those earning 30% or below the area median income) face a near-universal shortage of affordable housing. This shortage has been and will continue to rise.
- There is an excess of homeowner units affordable to moderate-income households (those earning between 60 and 120% of area median income).
- Many stations, particularly those in Miami-Dade County, are located near rapidly gentrifying communities with resident populations that are highly vulnerable to displacement.
- Transportation costs represent a meaningful share of household spending in the region, with pronounced transportation cost challenges in Broward and Palm Beach Counties. If affordable housing strategies are implemented immediately, neighborhood residents should benefit from reduced transportation costs without the threat of displacement.

Project Scope

This study focuses on the areas within 1 mile of a TRCL station. However, this data is compared to trends for the whole of Palm Beach, Broward, and Miami: the three counties served by the TRCL.

Using the existing Florida East Coast Railway between Jupiter in Palm Beach County and Government Center in downtown Miami. There are 28 proposed Costal Link stations, though both their placement and number are subject to change. They include the following:

In Palm Beach County:

1. Toney Penna, Jupiter
2. PGA Boulevard, Palm Beach Gardens
3. Park Avenue, Lake Park
4. 13th Street, Riviera Beach
5. 45th Street, St. Mary's, West Palm Beach
6. Evernia Street, West Palm Beach
7. Gregory Road, West Palm Beach
8. Lake Avenue, Lake Worth
9. Boynton Beach Boulevard, Boynton Beach
10. Atlantic Avenue, Delray Beach
11. NE 2nd Street, Boca Raton

In Broward County:

12. Hillsboro Boulevard, Deerfield Beach
13. Atlantic Boulevard, Pompano Beach
14. 38th Street, Oakland Park
15. 26th Street, Wilton Manors
16. Broward Boulevard/Government Center, Fort Lauderdale
17. Fort Lauderdale International Airport
18. Dania Beach Boulevard, Dania Beach
19. Hollywood Boulevard, Hollywood
20. Se 4th Street, Hallandale Beach

And in Miami-Dade County:

21. 192nd Street, Aventura
22. 163rd Street, North Miami Beach
23. 125th Street, North Miami
24. 79th Street, Miami
25. 55th/54th Street, Miami
26. 36th Street, Miami
27. 11th Street, Miami
28. Government Center, Miami

The stations represent a variety of city types, densities, and land uses. Several stations, like Downtown Fort Lauderdale, Government Center Miami, and Downtown West Palm Beach are dense, fully developed, major downtowns characterized by extremely high densities, apartment living, and a mix of uses. Others, such as the 36th Street Miami station, represent semi-dense urban areas with a mix of uses. Others, such as Lake Worth, are smaller town downtowns. Finally, stations like the West Palm Beach/St. Mary's or the Gregory Road station in West Palm Beach are less dense, fully suburban or industrial areas.

Due Diligence

To add context to the quantitative elements of this report, planners and housing officials were interviewed about affordable housing trends, local incentives for development of affordable housing, and any specific initiatives or plans in their area for promoting affordable housing. These experts represented:

	Municipality/Organization	Name
1	CRA, Lake Worth	Joan Olivia
2	Town of Lake Park	Nadia DiTommaso
3	Broward County	Mildred Reynolds
4	West Palm Beach	Jennifer Ferriol
5	Palm Beach Gardens	Nadia Crowley
6	City of Fort Lauderdale	Scott Strawbridge
7	City of Fort Lauderdale	Ella Parker
8	Palm Beach County	Sherry Howard
9	City of Hollywood	Anthony Grisby
10	North Miami Beach	Patrick Brett

Table 1. Interviews conducted during due diligence.

The majority of experts seemed cautiously optimistic about the planned TRCL and were pleased to hear that affordable housing was a topic for planning. However, for many of these experts the time between the initial announcement of the TRCL and its potential implementation date was long enough that it was no longer a planning focus.

Identified TRCL station areas are diverse in terms of the built environment: located in dense and walkable major cities, like Government Center Miami; small towns, like Downtown Lake Worth; or suburban areas like the Gregory Road Station. Denser, more walkable cities like Lake Worth were excited to hear that the TRCL project was moving forward. These communities are already somewhat dense and have a variety of housing types that promote affordability. Here, the new rail line is likely to raise housing costs but also promote density and save residents money on transportation costs. In areas like the one around the Dania Beach station or West Palm Beach 45th Street station, vacant land presents the opportunity to create a mixed-use TOD to help sustain ridership. In suburban areas that have few vacant or abandoned parcels like the area around the Gregory Road station, substantial zoning changes would be needed to create successful TOD or park and ride stations.

Most of the community experts said there was some affordable housing development within their jurisdiction. Many of these projects focused on elder housing, but there are projects for multi-family affordable housing, single family affordable housing developments, and affordable mixed-use development. In 2018, Broward County voters approved funding for an

affordable housing trust fund. Fort Lauderdale is developing an inclusionary zoning policy in response to public comment and input from a city commissioner.

In the strategies section of this report, accessory dwelling units and a mix of housing types are recommended as a regulatory approach to lowering housing costs while increasing density. Several municipalities have already adopted changes to allow and promote a mix of housing types. Broward County and the City of Fort Lauderdale have made changes to permit ADUs, though there has not yet been widespread adoption. The City of Fort Lauderdale is also working on a flexible zoning regime in order to promote a better mix of housing and commercial types. Lake Worth has worked to create a mixed-use district downtown and has promoted a variety of housing types, including a series of affordable live-work artist lofts that received national attention.

Outside of a few notable exceptions, most of the experts were familiar with the planned stations but had not created local plans to intentionally guide development near proposed stations. Even for those experts actively planning for a new station, many did not feel that affordable housing was an issue in their jurisdiction, either because they felt their community was already affordable or because their community was so wealthy that there was no demand for moderately priced housing stock. Most gave tacit support for the idea of incorporating affordable housing into TOD planning, but saw economic development as a more important goal for TOD than affordability. Larger cities and counties receive and disburse SHIP, CBDG, and HOME funds, but wealthier, smaller communities do not receive federal or state affordable housing funding. All of the counties and most of the smaller cities and town offer various incentives for development of affordable housing like impact fee modifications, density bonuses, and local government contributions for new construction and rehabilitation.

One exception to the lack of planning around TRCL stations is in Palm Beach Gardens. Palm Beach Gardens, in partnership with the Treasure Coast Regional Planning Council, received a grant for $150,000 to create a Station Area Master Plan and lead a series of public workshops. This included an economic analysis and created land use regulation recommendations. The station plan ended up recommending a remodel of the surrounding area and a change to up-zone much of the nearby land to high density multi-family and commercial. The plan also recommended a form-based code. However, the plan lacked an affordable housing component.

Another exception was the city of West Palm Beach, which has begun planning a transportation joint development (TJD) near its 45th Street Station, which includes affordable units primarily aimed at older adults. Housing prices in West Palm Beach are fairly high, but the area around the planned 45th street station is lower income and contains a number of vacant parcels. The City is planning to undertake a housing affordability and market study. Palm Beach County is also preparing to submit a proposal for an EPA Grant to help them create TOD plans for all the station areas within the county, which will dovetail with the city of West Palm Beach's existing efforts.

Advisory Group

In order to provide feedback on this report as well as the Transit-Oriented Development Business Plan created by Florida Atlantic University, SFRPC assembled an advisory board of 25 business, non-profit, academic, and government leaders. These advisors were assembled for a series of meetings to provide input and guidance for development of this report, create greater awareness of TOD and affordable housing, and develop connections between leaders in the area SFRPC serves.

The advisory council included the teams from the South Florida Regional Planning Council, Florida Housing Coalition, and Florida Atlantic University, as well as a collection of professors, executive directors, attorneys, and principal planners from organizations across the region. These individuals included:

- Christina Miskis, Regional Planner, South Florida Regional Planning Council
- Isabel Cosio Carballo, Executive Director, South Florida Regional Planning Council
- Ben Toro-Spears, Technical Advisor, Florida Housing Coalition

- Blaise Denton, Technical Advisor, Florida Housing Coalition
- John Renne, Assistant Professor, Florida Atlantic University
- Serena Hoermann, Outreach Coordinator, Florida Atlantic University
- Sara Forelle, Planning Section Supervisor, Broward County Government
- David Capelli, Co-Founder, #Smart Cohort
- Carla Mays, Co-Founder, #Smart Cohort
- Clark Stephens, Corporate Counsel, South Florida Community Land Trust
- Michael Marshall, Attorney, Gunster
- Armando Fana, Director of the Department of Housing and Community Development, West Palm Beach
- Barbara Blake Boy, Executive Director, Broward County Planning Council
- Evelyn Dobson, Executive Director, Delray Beach Community Land Trust
- James Carras, Principle, Carras Community Investment
- Jorge Damian de la Paz, Program Manager, University of Miami Office of Civic and Community Engagement
- Paul Calvaresi, Local Governmental Services Manager, Broward MPO
- Morris "Skip" Miller, Partner, Greenspoon Marder Law
- Suzanne Cabrera, CEO, Housing Leadership Council of Palm Beach County
- Timothy Hernandez, Principal, New Urban Communities
- Ralph Stone, Executive Director, Broward Housing Finance Authority

Program Eligibility Research

Development of affordable housing can be very challenging. One reason is the complexity of subsidies needed to make a project financially viable. Each subsidy source brings with it a set of programmatic or geographic criteria. It can be difficult to identify funds available for affordable housing development or other housing and redevelopment activities within station areas. In pursuit of identifying subsidy sources available within each station area, we conducted thorough due diligence and program eligibility research to determine sources of funding available within each station area. These programs, listed in Table 2, include funding sources generated at the local, state, and federal level. If a developer has a site within a station area, they should look to this table to identify the major sources of funding that could be deployed for the project and should reach out to local government staff as a starting point.

For each program in Table 2, a "Y" (yes), or a "N" (no), serves as an indicator of whether at least one census tract within the 1-mile station radius meets program eligibility requirements, or the presiding jurisdiction receives funding. Each program is briefly described below:

1. SHIP: an indicator of whether the station area is within the municipal boundary of a community that receives SHIP allocation from the state Sadowski Trust Fund, administered by the Florida Housing Finance Corporation (FHFC).
2. HUD: an indicator of whether the station area is within the municipal boundary of an entitlement jurisdiction that receives HUD Community Planning and Development (CPD) program grant funds. CPD grant programs include the Community Development Block Grant (CDBG), the Home Investment Partnerships (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with Aids (HOPWA). Not all entitlement jurisdictions receive all four HUD CPD grant programs, depending on a variety of factors. The program eligibility table below shows the HUD CPD program received by the entitlement jurisdiction as of the 2018-19 fiscal year according to public documents made available through HUD.
3. Low- and Moderate-Income Individuals (LMISD): HUD CPD grant programs must be deployed in eligible census tracts that meet the criteria for a LMISD area.
4. Community Reinvestment Area (CRA): Depending on the CRA, local funds may be available for affordable housing development within the boundary of the CRA. Local funding may include bond funds, tax programs (including tax increment-financing (TIF)), or other revenues allocated to community development and affordable housing as detailed by the CRA.

5. Opportunity Zone (OZ): whether the station area is within a designated Qualified Opportunity Zone (QOZ). The Opportunity Zone program was created in the December 2017 Tax Cuts and Jobs Act (TCJA), and offers investors generous tax benefits for investment of capital gains in businesses, including housing property, in designated QOZs.
6. Brownfield (B'field): whether the station area is in a designated Racially/Ethnically Concentrated Area of Poverty. Depending on the local community, development projects located in a R/ECAP may receive regulatory and financial incentives.
7. Difficult Development Area (DDA): The Florida Housing Finance Corporation (FHFC) offers bonus funding for selected tax credit projects in areas designated as a DDA.
8. Opportunity Area (OA): The FHFC awards funding to projects in OAs, to avoid legal liability under the Supreme Court's decision in Texas Department of Housing and Community Affairs v. Inclusive Communities Project.

#	Station Name	SHIP?	HUD?	LMISD ?	CRA (TIF)?	OZ?	B'field?	DDA?	Opp. Area?
1	Jupiter	N	CDBG	Y	Y (Y)	N	N	Y	Y
2	Palm Beach Gardens	N	CDBG	N	N	N	N	Y	Y
3	Lake Park	N	N	Y	Y (Y)	Y	N	N	N
4	Riviera Beach	N	N	Y	Y (Y)	Y	N	N	N
5	West Palm Beach/ St. Mary's	Y	CDBG; HOME; HOPWA; NSP	Y	Y (Y)	Y	Y	N	N
6	Downtown West Palm Beach	Y	CDBG; HOME; HOPWA; NSP	Y	Y (Y)	N	Y	N	Y
7	Gregory Road, West Palm Beach	Y	CDBG; HOME; HOPWA; NSP	Y	Y (Y)	N	Y	N	Y
8	Downtown Lake Worth	N	N	Y	Y (Y)	Y	Y	N	N
9	Downtown Boynton Beach	Y	CDBG; NSP	Y	Y (Y)	Y	Y	Y	N

#	Station Name	SHIP?	HUD?	LMISD ?	CRA (TIF)?	OZ?	B'field?	DDA?	Opp. Area?
10	Downtown Delray Beach	Y	CDBG	N	Y (Y)	Y	N	Y	Y
11	Downtown Boca Raton	Y	CDBG	Y	Y (Y)	N	N	Y	Y
12	Downtown Deerfield Beach	Y	CDBG; NSP	Y	Y (Y)	N	N	N	Y
13	Downtown Pompano Beach	Y	CDBG; HOME; NSP	Y	Y (Y)	Y	Y	Y	N
14	Oakland Park	N	N	Y	Y (N)	Y	N	N	Y
15	Wilton Manors	N	N	N	N	N	N	N	Y
16	Downtown Fort Lauderdale	Y	CDBG; ESG; HOME; HOPWA; NSP	N	Y (Y)	Y	N	N	N
17	Fort Lauderdale Airport/ Port Everglades	Y	CDBG; ESG; HOME; HOPWA; NSP	N	Y (Y)	N	Y	N	N
18	Dania Beach	N	N	Y	Y (N)	Y	Y	Y	Y
19	Downtown Hollywood	Y	CDBG; HOME; NSP	Y	Y (Y)	Y	N	N	Y
20	Hallandale Beach	N	N	Y	Y (Y)	Y	N	N	N
21	Aventura	N	N	Y	N	Y	N	Y	Y
22	North Miami Beach	N	N	Y	Y (Y)	Y	Y	Y	Y

#	Station Name	SHIP?	HUD?	LMISD ?	CRA (TIF)?	OZ?	B'field?	DDA?	Opp. Area?
23	North Miami	Y	CDBG; HOME; NSP	Y	Y (Y)	Y	Y	N	N
24	79th St/ Upper Eastside	Y	CDBG; ESG; HOME; HOPWA; NSP	Y	Y (Y)	Y	Y	Y	Y
25	54th Street, Miami	Y	CDBG; ESG; HOME; HOPWA; NSP	N	Y (Y)	Y	Y	Y	Y
26	36th Street, Miami	Y	CDBG; ESG; HOME; HOPWA; NSP	Y	Y (Y)	Y	Y	Y	Y
27	Midtown/ Design District	Y	CDBG; ESG; HOME; HOPWA; NSP	Y	Y (Y)	Y	Y	Y	Y
28	Downtown Miami	Y	CDBG; ESG; HOME; HOPWA; NSP	N	Y (Y)	Y	Y	Y	Y

Table 2. Program Eligibility by station area

Affordable Housing Strategies

In 2019, Florida counties and municipalities face an affordable housing crisis. This crisis is carried on the backs of hard-working Florida families who face impossible household budget choices like whether a rent payment should come before purchasing groceries, medical care, or an electric bill. Most policymakers in southeast Florida, including representatives from municipalities in Palm Beach, Broward, and Miami-Dade counties, are familiar with the mounting pressure for affordable and workforce housing in their communities.

Research conducted for this report revealed inconsistent understanding of the tools and strategies available for promoting development of affordable housing. Some municipalities are intimately familiar with strategies available to them. Fort Lauderdale staff, for instance, was preparing a feasibility study for a mandatory inclusionary zoning program at the time this report was written. Some municipalities, on the other hand, passed responsibility for subsidizing development of affordable housing off to other entities, or said affordable housing was not an issue in their community whatsoever. Given the disparities in knowledge of housing strategies available to policy makers, this section details a menu of options.

We should note: given the scale of the study area – three counties and dozens of municipalities – not every strategy should be deployed in each station. In fact, within stations, some strategies should be applied to some census tracts but not others. Each community must examine its own policies and consider how it might adopt a strategy detailed here within its own context. To help illustrate how strategies might be deployed in a local context, including data points that might inform the need for a given strategy, this section includes a more detailed look at two station areas: Boynton Beach and the City of North Miami.

Understanding that strategies are not applicable in every housing and economic context, we organize suggested affordable housing strategies by the broad economic environment – expensive, inexpensive, and universal. We recognize that in some cases an 'expensive' market strategy can be deployed in an area with low household incomes and little development. In particular, cross over strategies might be deployed in a community facing rapid cost inflation due to external demand pressures like an anticipated major employer's relocation or arts and culture-driven housing demand.

Expensive Markets

ADU Policies

Models:

- Santa Cruz, CA

Considerations:

- Minimum living area requirements.
- Minimum lot sizes.
- Setbacks.
- Additional parking requirements.
- Financial support for homeowner adoption of ADU program.
- Use of local subsidies, including SHIP, for rehabilitation and new construction.

Accessory dwelling units (ADU) are small-scale rental units situated on the lot of a single-family home; providing a smart growth tool for increasing development in areas with existing infrastructure. ADUs are a market-based tool that enhances the property rights of landowners and often receive support across the political spectrum.

The housing stock in Palm Beach, Broward, and Miami-Dade is dominated by single-family, detached housing units. Given this reality, dramatic increases in density through multi-family development in all communities, with the exception of the larger municipalities, is unlikely. Rather, local governments should make every effort possible to encourage by-right development of ADUs, especially in single-family zoned areas. ADUs utilize existing land effectively with low impact as a workforce housing opportunity while expanding private property rights.

In conjunction with allowing ADUs in all single-family districts, when devising structural requirements local governments should regulate in ways to facilitate the development of ADUs. Minimum lot size, ADU size, and other requirements should be set so as not to prohibit single-family homeowners from choosing to build an ADU. Parking requirements for ADUs in particular can be extremely burdensome for the homeowner if too stringent. For smaller lots, a requirement for additional parking might make ADU development impractical – lots may have insufficient space for both an ADU and a parking spot. We emphasize the importance of thinking critically about the balance between parking demand and setting prohibitive barriers for development of ADU because too many communities are unaware of the impact parking requirements have on the ADU market. Additionally, especially near public transit like the TRCL, the increased density generated by ADUs can actually reduce the number of cars on the road and decrease the overall need for parking.

When pursuing ADU-supportive policies, local governments should be aware that single-family homeowners know little about local regulations, building codes, and the development process in general. To alleviate this burden, local governments should offer streamlined and transparent permitting for ADUs. Local governments can also promote the use of ADUs by providing a clear process for property owners. This guidance should clearly communicate the benefits of adding an ADU and should explain design requirements and necessary steps in the permitting process.

A final supportive policy available for local governments to promote ADU development is offering financial assistance. Our suggested model ADU community, the City of Santa Cruz, offers an ADU loan program for homeowners at 80% or below the City's median household income. These loans are up to $100,000 at a 4.5% interest rate. To receive the financing, the homeowner must agree to keep the rental unit affordable to low-income tenants for a period of at least 15 years. If the homeowner defaults on the affordability requirement, they must repay the full amount of the loan plus interest. With loan and deed restrictions and the threat of default, local governments can ensure that the ADUs they help finance are used for workforce rental housing for low- to moderate- income persons.

Inclusionary Housing Policy

Models:

- In December, 2018 Miami-Dade County established its own mandatory inclusionary zoning ordinance for a limited area covered by its Omni CRA district.

Considerations:

- Project sizes.
- Time period of affordability.
- Unit requirements.
- Income ranges supported by the program.
- Controls to enforce affordability.

Inclusionary zoning is considered a national best practice for encouraging higher densities and boosting the supply of attainable housing in a community. Typically, inclusionary zoning requirements mandate a certain percentage of new multi-family housing units be made affordable to a select household AMI range. Inclusionary zoning is particularly effective in attractive real estate markets, where demand far outstrips supply and developers can absorb increased costs associated with more intensive development. The distinction between an inclusionary zoning ordinance and a bonus density program is that bonus density programs are voluntary, while inclusionary zoning ordinances are mandatory.

Inclusionary zoning should be adopted in all higher density zones in Palm Beach, Broward, and Miami-Dade, particularly urban areas and municipalities experiencing significant housing demand and interest from the development community. While offering a significant opportunity for a strengthened tax base and concentration of population in mobility-rich and infrastructure-ready regions, these areas are simultaneously vulnerable to cost pressures in the housing market. An inclusionary zoning requirement would go a long way to ensuring a diverse mix of incomes, and a resilient local economy in the years ahead.

Linkage Fee Ordinance

Models:

- City of Los Angeles, CA linkage fee ordinance, passed December 2017.
- City of Boulder, CO linkage fee ordinance, updated May, 2018.

Considerations:

- Methodologically rigorous linkage fee nexus analysis.
- Type of impacted development (commercial, residential).
- Size of impacted development (square footage, minimum lot size).
- Amount of fee per square foot.
- Any exemptions of waivers, including type of project, property owner.

Linkage fees "link" the development of non-residential construction to the housing demand generated by the employees working there. Under a linkage fee ordinance (which is complementary to an inclusionary ordinance discussed above) local governments collect money from non-residential developments to be placed in a housing trust fund for others to use to produce and preserve workforce housing. Linkage fees reflect the recognition that new commercial and industrial uses increase the need for low-wage employment and workforce housing in the community. Typically, certain commercial uses are exempted from the linkage fee ordinance, such as nursing homes and schools. The ordinance must address who pays, how much, and what the funds will be used for. As with other impact fees, linkage fees require a nexus study based on recent and localized data and are typically assessed by square footage. Linkage fees are a reasonable way to raise funds for workforce housing, as the employers are the ones who will be subsidizing the housing for the workforce. A linkage fee could also be applied to residential development, typically restricted to larger luxury homes.

In the TRCL context, mandatory linkage fees would represent a significant source of funding for affordable housing, particularly in the line's expensive markets in Miami, Fort Lauderdale, and West Palm Beach. These communities are attractive for developers and have an undersupply of affordable housing units. We understand many communities in southeast Florida have considered linkage fees, with most choosing not to impose a linkage fee. There are notable exceptions, including the Town of Jupiter's workforce housing program (WHP), which imposes a $1.00 per square foot non-residential development linkage fee for projects over 10,000 square feet.

Zoning Flexibility

Models:

- City of St. Petersburg, FL, NT-1 zone; commercial corridor land use plan
- City of Miami

Considerations:

- Existing permissions for ADUs.
- By-right development of duplexes, triplexes.
- Existing land use and built environment.
- Homeowner versus rental demand.

Local governments should allow for and encourage more multi-family, duplexes, villas, and other housing types that house more than just a single family. In general, municipalities and the three unincorporated counties should all permit smaller units, adjust minimum lot sizes, reduce setback requirements to allow for smaller units, encourage a mix of properties, and allow higher densities. This strategy is particularly important in more expensive markets where nontraditional parcels are still financially viable for development.

We stress that for communities along the TRCL, it is incumbent on each community to evaluate its own zoning and land development codes and make adjustments to permit by-right development of more affordable options. Many communities along the TRCL have implemented a range of these zoning flexibilities. For further reference on the dynamics of local zoning and flexibility, refer to the two station profiles discussed later in this report.

In general, this strategy addresses what is known as the "missing middle." The missing middle is described as the medium-density stock of housing options between the scales of single-family homes and mid- or high-rise developments; these options range in density from 16 units/acre to 35 units/acre. This includes duplexes, triplexes, courtyard apartments, bungalow courts, townhouses, and other similar structures. They are "missing" in most jurisdictions due to the single-family home being the dominant residential land use outside of downtowns, while massive apartment complexes or buildings dominate downtown areas. These missing middle housing types create small-footprint, middle-density buildings which are ideal for families and individuals that want to live in smaller, quieter neighborhoods than downtowns but still want the access to jobs and amenities that city living affords. These middle densities support efficient transit options and walkability. It is a market-based strategy for producing modest housing, which will create housing affordable to households who may not be income eligible for "affordable housing" but need a product that costs less than the typical single-family home across the three-county area.

In addition to greater flexibility, municipalities and unincorporated counties should activate more "up-zonings" in the area – that is, they should allow higher densities in more locations to encourage workforce housing development and a more efficient use of the land. However, when allowing higher densities, jurisdictions should make sure that some of this density is used for workforce housing with assurances of long-term affordability. When paired with a well-considered inclusionary zoning ordinance, for example, increased densities in the zoning code could produce more units overall provided a portion of those units would be for permanent or lasting workforce housing.

Inexpensive markets

Robust Surplus Lands Policy

Models:

- Miami-Dade in-fill program (will clear liens from certain properties).
- City of West Palm Beach surplus lands program.

Considerations:

- City/County owned properties acquired through various means (e.g. code enforcement liens, tax delinquency, escheatment/abandoned property).
- Means of disposing of property (e.g. through a CLT, deposits to a housing trust fund).
- Relationship with high capacity CLT.
- Monitoring and oversight of properties.

Pursuant to Sections 166.0451 and 125.379 of the Florida Statutes, commonly referred to as the "surplus land statutes," municipalities must prepare an inventory of real properties within the respective jurisdiction to which the local government holds title that are also appropriate for affordable housing. In addition, these laws enumerate several options for local governments to make the identified properties, or the proceeds for the sale of the properties, available for affordable housing purposes.

In reality, a majority of communities in Florida fail to meet the requirements in the surplus land statutes. And worse, a jurisdiction may follow the letter of the law but fails to make the surplus lands readily accessible to the broader public and interested developers on a regular basis. In some cases, it is necessary to review a jurisdiction's court records to determine available lands. If surplus property is developable it should be found appropriate for affordable housing and be placed on the affordable housing inventory list. If local government keeps surplus lands off the inventory in order to sell and use the proceeds for other purposes, it is not acting within the intent of the surplus land statute. A distinction should be drawn between properties that will be donated or sold for affordable housing use and those that will be sold for non-affordable housing uses.

As a part of a surplus land program, jurisdictions should consider donating its surplus land to nonprofit organizations that will keep the property affordable long-term or to CLTs to develop and manage the lands for permanently affordable workforce housing. CLTs can carry out stewardship services which local government staff would have to perform in areas that do not yet have a CLT.

Every community along the TRCL should develop a process for identifying lands and making them available for donation or purchase by nonprofit developers. Ideally those lands would have a dedicated and publicized web presence on the jurisdiction's home page and supporting materials like zoning and land development regulations would be packaged with the property availability. Every jurisdiction should do everything in its power to make those lands accessible and developable for affordable housing.

Targeted Code Enforcement and Rehabilitation Program

Models:

- Baltimore City, Vacants to Value program

Considerations:

- Targeting neighborhoods with naturally occurring affordable housing.
- Target property types (e.g. small multi-family, single-family homes).
- Absentee landlords.
- Recessions.
- High capacity nonprofit or CLT that can take title to good property.

Depending on economic conditions in a community, code enforcement can serve as one of the richest sources of government held housing stock. There are multiple means by which code enforcement can serve to improve housing quality in areas with naturally occurring affordable housing. First, in the case of absentee landlords with a record of failure to properly maintain their property and facing increasing code enforcement liens, the property owner may decide to forfeit the property or enter it into the foreclosure process. This is particularly true during economic recessions, when owners are more likely to become delinquent on their taxes or out-of-state owners fail to maintain property. During the 2008 economic recession, municipalities across Florida were inundated with housing stock – much of it in deteriorated condition.

Second, strict code enforcement in targeted areas can bolster local property values and support lower-income homeowners with no option but to remain in a community. This is particularly important for communities with high rates of homeownership and low rates of educational attainment and lower median household incomes. Local governments should particularly focus on exterior maintenance, including trash pickup and lawn maintenance.

Understandably, local governments often see properties as a drain on tight municipal budgets and wish to dispose of the property as quickly as possible. If a city or county holds title to a piece of property, it should endeavor to offer those properties, if deemed buildable and valuable, to a high capacity nonprofit or affordable housing developer who can

rehabilitate the property and make it available to income-eligible buyers or renters. This is doubly important for a CLT to promote long-term affordability.

Employer Assisted Housing Program

Models:

- Washington DC, Employer Assisted Housing Program (EAHP)
- Johns Hopkins University, Baltimore, Live Near Your Work program

Considerations:

- Availability of middle-income housing units for employer workforce.
- Willing employer with sufficient cash or risk profile to offer incentives.
- Type and amount of assistance (loan, grant, etc.).
- Recipient income eligibility.
- Tenure type.

An employer assisted housing (EAH) program is a term to describe any housing-related benefit offered by an employer to its employees. The employer can be either a public or a private sector organization. Local governments should consider deploying an Employer-Assisted Housing (EAH) program for governmental employees, or actively promoting adoption of an EAH program by private sector employers. An EAH program is traditionally composed of workforce down-payment and closing cost assistance to lower barriers to homeownership for income-eligible employees. Many EAH programs extend beyond homeownership assistance and offer rental assistance or security deposits for their employees who wish to rent.

There are many options for employer-assisted housing programs, including gap financing, payroll savings matches, and land donation. A City and/or County-run EAH program would provide law enforcement and other vital government employees the opportunity to live in the communities in which they serve. An EAH program helps retain government workers for a set amount of time by assisting them with housing costs.

An EAH program should be the result of a broad partnership with developers, lenders, and community-based housing assistance programs such as Habitat for Humanity, a CLT, or other 501(c)(3) housing organizations to help steward the program.

Adaptive Reuse

Models:

- City of Tampa, Armature Works
- City of Orlando, East End Market
- City of Baltimore, Miller's Court

Considerations:

- Flexible zoning and land-use regulations.
- Layering place-based incentives, including Brownfield program and New Markets Tax Credit program.
- Availability of vacant or underutilized industrial parcels.
- Experienced developer with a creative mindset.
- Pairing a comprehensive neighborhood revitalization strategy with catalytic adaptive reuse projects.

One of the most limited resources that cities and counties have in achieving a successful workforce housing program is land near employment centers. Increasingly, developers and local jurisdictions are turning to vacant, underutilized, or dilapidated commercial, retail, and industrial properties for adaptive reuse. Local governments could partner with landowners, developers, and non-profits to repurpose existing commercial, retail, and industrial properties that appear

to be in disrepair or are abandoned if the land is appropriate for workforce housing. Whatever government action is taken should be coupled with assurances of long term/perpetual affordability.

A key consideration for repositioning these properties is flexible zoning and land-use regulations. Municipalities should allow necessary land use changes for a comprehensive adaptive reuse program. This might entail rezoning certain commercial and industrial districts, amending the zoning code, and amending the Comprehensive Plan Future Land Use Map as necessary to allow for more residential uses in these areas. In the TRCL context, a persistent feature of land use for many of the stations is light industrial zoning along the rail line itself. These parcels, in many cases, feature blighted characteristics and depressed land values. This environment is a perfect environment for creative application of zoning changes and a focus on catalytic adaptive reuse projects that reinvigorate the station area and attract future development.

We also suggest pairing Brownfield program incentives with adaptive reuse projects, since many old industrial sites along the rail line have a complicated environmental history. The Brownfield program is designed to alleviate legal liability concerns for the developer, and provisions of the program incentivize development of affordable housing units. If an area is designated as a Brownfield, the state provides financial incentives for workforce housing development. For example, there is 1) a sales tax refund available for building materials purchased and used in the construction of a housing or mixed-use project located in a Brownfield area; 2) a Voluntary Cleanup Tax Credit (VCTC) in which a 50% state tax credit is provided up to a maximum annual $500,000 per site for eligible costs for environmental cleanup work; 3) a State Brownfield job bonus refund which gives up to $2,500 per new job created; and 4) state loan guarantees for Brownfield projects. The Florida Brownfields program is a great option for repurposing industrial areas.

Universal

CLT

Models:

- South Florida Community Land Trust
- Community Land Trust of Palm Beach County
- Delray Beach Community Land Trust

Considerations:

- Resale formula and ground lease.
- Seed funding for new CLT.
- Surplus lands inventory and partnership with CLT.
- Availability of single-family homes.

A community land trust (CLT) is an affordability mechanism that separates the ownership of land from the improvement (home) to make housing affordable to lower-income households. Typically, a CLT is formed as a community-based nonprofit organization with a mission to increase the supply of affordable housing in perpetuity. A community land trust is a vital tool for workforce housing. A CLT can monitor long-term affordability to provide housing opportunities to more low-income persons, maximize the use of surplus lands for workforce housing, preserve local government subsidies with resale restrictions, and otherwise carry out stewardship tasks for the local governments.

CLTs are ideal for preserving local government's SHIP and other housing subsidies. Because CLT homes are affordable in perpetuity due to their resale restrictions, they are a one-time investment of SHIP and other government dollars. Under the normal economic environment of rising prices, local government monies recovered from a loan made five to ten years earlier are typically not enough to get a similarly situated income-eligible family into homeownership, as the gap between the family income and the cost of the house will now be greater. In the typical growth economic environment, local government would have to spend an ever-increasing amount of its funds to make homeownership available to the next homebuyer. In using local government dollars to support CLT homeownership, however, the local government subsidy is

retained in the home and continues to be affordable to a similarly situated income-eligible family regardless of the rise in home prices. The CLT model is the ideal tool to keep housing affordable to low-income workers as the median cost of housing rises.

Affordable Housing Ombudsman/Liaison

Models:

- City of Orlando

Considerations:

- Average time spent processing developments.
- Budget for a new housing position.
- Level of demand for affordable housing development.

The longer a developer must hold a piece of land, pay taxes on it, and delay closing on construction financing represents costs to the developer. Affordable housing developers, particularly non-profits, typically do not have large cash reserves to cover long periods of municipal permitting and processing of housing projects. To address this challenge, we suggest that local governments prioritize processing of all affordable housing and hire or appoint a staff person responsible for work full-time to shepherd affordable housing projects from concept to vertical construction. This workforce housing ombudsman will have intimate knowledge of local development opportunities, would manage the community's surplus lands list, and would interface directly with the development community.

This person would act as the general liaison with tax-credit and other workforce housing developers to assist the development process. Additionally, they would monitor long-term affordability and work to shepherd workforce housing applications through the relevant reviews to expedite permitting to meet the statutory requirement for all jurisdictions that receive SHIP funds. This person could also facilitate the process of having an affordable housing impact analysis that would meet the intent of the statutory requirement for ongoing review to consider the impact on housing of all newly adopted plans and policies.

School System/Large Employers

Models:

- San Jose, CA school district, multi-family apartment property management, 2019
- Miami-Dade School District, Phillis Wheatley Elementary project

Considerations:

- School-owned land suitable for housing.
- Public-private partnerships.
- Reserved units for employed school teachers.
- Appropriate rent limits.

Local governments can partner with their local school board to improve workforce housing prospects for essential school employees. Pursuant to Section 1001.43(12) of the Florida Statutes, school boards have the authority to use portions of purchased school sites, land deemed not suitable for education purposes, or land declared as surplus by the board to provide sites for housing for teachers and other school personnel. In a partnership with the school board, the local governments can assist through the development process and provide resources as necessary to ensure that more housing opportunities are provided for these workers.

School boards have the authority to modify school impact fees. A partnership with the school board can aid in providing the essential school employees with necessary housing close to their places of work. Collaborations with other large

employers, including hospitals, and private sector businesses may also make a substantial contribution to the development of workforce housing. These entities could donate land for development of workforce housing and receive incentives in return.

Opportunity Zone & Place-Based Incentives

Models:

- City of Redmond, OR, Hunter Renaissance Development LLC, Historic Redmond Hotel Redevelopment
- Bethlehem, PA, Jefferson-Warner LLC

Considerations:

- Minimum 10-year hold period for 100% capital gain exclusion.
- Capital gain deferral until December, 2026.
- Sourcing investors nationally or locally.
- Identification of suitable parcels for development of affordable housing.
- Equity, ownership, and exit of investors.
- Project must invest 100% of improvement basis within 30 months of acquisition.
- Value of land is not included in substantial improvement requirement.

A small provision in the 2017 Tax Cuts and Jobs Act, signed into law in December 2017, created the Opportunity Zone (OZ) program. These OZs are specially designated census tracts eligible for investment through an investment vehicle called a Qualified Opportunity Fund (QOF). Private investors that invest unrealized capital gains into a QOF receive incremental tax benefits on those capital gains based on the number of years the capital is in the QOF. If investors maintain their position in the QOF for 10 years or more, the investment basis is boosted to fair market value at time of sale, effectively eliminating capital gains tax liability.

Estimates on the potential capital market for OZs are considerable. According to the Economic Innovation Group (EIG), unrealized capital gains in the U.S. amounted to approximately $6 trillion in 2017, inclusive of corporate and individual capital gains. This represents a significant opportunity to funnel capital into housing cost-burdened communities in southeast Florida.

Affordable Housing Supply and Demand Analysis

This section examines the availability of, and demand for, housing units by tenure type in each station area. We first detail the methodology used for the housing supply and demand analysis, then offer a brief summary of findings. The results of this gap analysis are included for reference in each station profile included later in this report.

Methodology

A gap analysis allows a policymaker to understand the gap between the number of renter and owner households in a particular income bracket and compare that number to the number of homes affordable to that group. This report examines the gap between the number of renter and owner households and available homes by income bracket in 2010 and 2017. It then suggests projected housing demand in each station area by 2025.

We must emphasize a critical point: this methodology produces an estimate of the total supply and demand for units at certain income thresholds. It does not detail the degree to which these units are actually available to an "appropriate" household. For instance, a rental unit affordable to a household earning 60% of AMI should be occupied by a household earning 60% AMI or below. In reality, we know this is not the case. The data presented in this report shows an absolute undersupply of housing affordable to extremely low-income renter households, which forces those same households to occupy more expensive housing. Similarly, higher income households may elect to occupy a more affordable unit to save money or apply savings to other household budget items.

Assumptions

Our methodology makes several assumptions. For rental units, it is assumed that gross rent should not exceed 30% of a household's monthly income. This is a widely accepted threshold for determining cost burden. For a homeowner household, the study assumes a 25% cost burden threshold for homeowner income because maintenance costs and interest payments add additional cost. A 4.35% annual interest rate is assumed, which was the median mortgage rate according to Freddie Mac's primary mortgage market survey as of 2/28/2019. The study also assumes a 3% down payment, which is a low estimate for wealthier households but reasonable for lower-income households. We also use the median household income for the respective county of each census tract. This assumption recognizes population mobility and the spatial mismatch between job and home location. We assume a 30-year fixed rate mortgage for homeowner affordability calculations.

Process

To perform this gap analysis, four publicly available census data sets were used for all tracts in Palm Beach, Broward, and Miami Dade Counties. These data sets are:

1. Gross rent by rent thresholds. This is used to measure supply of rental units.
2. Home value thresholds and number of units in each census tract. This is used to measure supply of owner units.
3. Tenure by household income. This is used to measure demand.
4. Median household income for all households. This is used to identify income band thresholds.

First, median household income for all households is multiplied by 0.3, 0.6, and 1.2 to generate income bands:

1. Very Low-Income: 0 – 30% AMI
2. Low-Income: 30.1 – 60% AMI
3. Moderate-Income: 60.1% - 120% AMI

To calculate affordable rent prices by income bands, the median household income of the respective county is taken and then divided by 12 to represent monthly income. This is then multiplied by .3 (i.e. the cost burden limit). This is also done for the 30% AMI, 60% AMI, and 120% AMI thresholds.

To calculate the price of an affordable home for an owner at each income band, the median county household income is divided by 12 to represent monthly income. This number is multiplied by .25 which is the assumed 25% cost burden threshold for homeowners, explained above under assumptions. We then calculate the present value to arrive as follows:

$$PV = \frac{\mathrm{Ci}}{(1 + \mathrm{r})\mathrm{n}}$$

Where Ci = cash flow at period 1

r= rate of return

n= 360 periods

After calculating the price of home or rental unit that a family can afford for each income bracket, the total number of homes within the affordable range for each bracket is summed for each county using the gross rent by rent threshold and home value threshold data. The sum of households fitting into each bracket is calculated in the same way using the tenure by household income variable.

Finally, the number of homes in each bracket is subtracted by the number of residents within that tenure to arrive at the housing gap. This is done for both 2010 and 2017. 2010 and 2017 are compared to find change over time, and this is used to make predictions of the housing gap in 2025. Using ArcGIS, "snapshots" are taken of each station area.

Summary and Analysis

The housing gap assessment examines the difference between what renters and homeowners in an area can afford and the homes and rental units actually available. An in-depth analysis of the gap assessment is included in each station profile, included later in this report. This section provides an overview of the gap assessment findings along with major trends by jurisdiction and particular hotspots.

Overall, the gap between the number of homes and rental units available at a price point accessible for low- and moderate-income individuals has shrunk or vanished. There have been huge gains in affordability for people in the 30.1%-60% of AMI bracket. While extremely low-income homeowners and low-income renters still face serious housing gaps, the gap has shrunk dramatically which suggests greater affordability in these brackets. Low-income homeowners now see a surplus of options and the surplus for moderate-income renters and homeowners has more than doubled.

The dark spot on these otherwise bright findings is that the gap for extremely low-income (30% AMI) renters has skyrocketed. There is now a deficit of 40,906 homes in the station areas for extremely low-income, worse by 14,878 units from 2010. This suggests a tightening of this market and less affordability for families in the extremely low-income range.

Unsurprisingly, the areas that have the largest gaps by percent of low-income homeowners tend to be areas that score the highest on the Housing Resiliency Index (HRI): i.e. wealthy, well-educated areas. The Palm Beach Gardens and Aventura have extremely tight markets, particularly for low- and extremely low-income renters, with Palm Beach Gardens having a 456 fewer rental units for renters making 120% of the AMI or less than they need. The Government Center/Downtown Miami Station area has the highest number of extremely low-income renters and homeowners, with 4,585 rental units needed to meet demand, but it also has the highest total number of renters and homeowners.

Housing Resilience Index and Housing Instability Index

Housing dynamics are rooted in neighborhoods. Given the scope of the study area covering three counties and 28 stations, it is critical for policymakers to have a standard measure for housing instability, e.g. the direction of the housing market over time, and the degree to which households are vulnerable to displacement from future housing inflation. To address this need, this report developed two indices: the housing resilience index (HRI) and the household instability index (HII).

This section details the methodology for developing each index, and discusses a high-level summary of the data.

Methodology

The most effective affordable housing strategies are tailored to the local housing market. An inclusionary zoning requirement, for instance, would not be an ideal solution for undercapitalized markets with high poverty and a low median income. On the other hand, that same inclusionary zoning requirement is better suited for a strong housing market with high development interest.

FHC believes affordable housing strategies should be informed by data. With this in mind, we developed a station area housing market typology which we based on two housing affordability indices.

Indicators and Methodology: Station Area Housing Market Typology

In order to identify both rapidly appreciating areas as well as those areas where residents are least likely to be able to weather shifts in housing costs, two indices were created. In the interest of identifying census tracts that have experienced rapid changes in housing cost burden and demand-side pressure on housing, the following indicators were selected for the station area typology as part of the HII:

1. Percent change in population between 2010 and 2017;
2. Percent change in rental housing cost burden between 2010 and 2017;
3. Percent change in median gross rent as a share of household income between 2010 and 2017.

In the interest of identifying census tracts where residents were the most vulnerable to housing pressures, the following indicators were selected for the station area typology as part of the HRI:

1. Household Income in 2017
2. Poverty Rate in 2017
3. Unemployment in 2017
4. Educational Attainment in 2017

Each of the indicators above is collected for every census tract in the study region, inclusive of census tracts in Palm Beach, Broward, and Miami-Dade counties. From this regional dataset, both the mean (μ) and the standard deviation (σ) are computed for each indicator. Each indicator is standardized by converting to a z-score. To do this, each tract's indicator value is subtracted from the regional average and then divided by the indicator's standard deviation. Formally, for each indicator i:

$$z(i) = \frac{(i - \mu)}{\sigma}$$

Following this transformation, each outcome index is computed as an unweighted average of its constituent z-scores to derive the Composite Index Score (C). Formally, Composite Index Scores (C) are given by:

$$C = \frac{1}{n}\sum_{i=1}^{n} xi$$

Where n = the number of indicators, and xi = the value of each indicator.

The resulting C scores are rescaled to a range of 0-100 to represent each census tract's regional percentile rank.

Interpretation

A tract with an HII score of 80 would imply that the census tract experienced inflationary pressures on housing cost at a rate faster than 80% of all tracts in the region. A score of 50 means the tract is in the 50th percentile—half of all tracts in the region have higher scores and half have lower scores. Higher values for the HII indicate a less desirable outcome, while lower values represent more desirable shifts in cost burden. The inverse is true for the HRI. A score of 80 on the HRI indicates that the residents of a census tract are better able to adjust to increased housing prices than the residents of 80% of the census tracts in the three-county area.

Summary of Results

An in-depth analysis of the HRI and HII is available for each station area under their station profile. This section provides an overview of the HRI and HII findings along with major trends by jurisdiction and particular hotspots.

Over all, the majority of station areas in Palm Beach and Miami Dade County showed higher HII than HRI, meaning that, compared to all the census tracts in the three-county area, the areas around these stations are less wealthy and are showing rising cost burden, population change, and rising rents. This is particular noticeable in the station areas right outside downtown Miami (the Upper Eastside station, the 54th street station, and 36th Street station) and in central Palm Beach County, particularly Downtown Boynton Beach, Downtown Lake Worth, and Downtown Riviera Beach. Out of 18 stations in these counties only 4 have the higher HRI than HII: meaning residents are more able to respond to rising rents: the far northern end of the line in Palm Beach (the Jupiter and Palm Beach Gardens stations), Aventura in north Miami-Dade and the Downtown Miami station at the tail of the line.

Out of 10 stations in Broward County, 6 have higher HRI than HII: that is residents in these station areas are less vulnerable than those around the Palm Beach and Miami-Dade stations. Even in those station areas where HII is higher than HRI, most of the stations in Broward County do not have the dramatic disparities seen in the other two counties, with the notable exception of the Downtown Pompano Beach station which has one of the highest HII to HRI disparities along the entire line.

Overall, downtowns with smaller, poorer and less educated populations near expensive, high HRI (that is areas that are wealthy, educated) cities are seeing large spikes in growth, even as their existing populations remain poor compared to the region as a whole. This may suggest that rising costs in wealthier, higher HRI areas (Jupiter, Palm Beach Gardens, Wilton Manors, Aventura, Downtown Miami) are pushing people into areas of naturally occurring affordable housing. When graphed, the HII and HRI appear form an inverse wave: wealthy, high HRI areas are surrounded by poor, low HRI and high HII areas.

Station Profiles

As discussed in the sections above, this report developed hyper-local metrics to determine:

A. The degree to which station areas have experienced increased cost burden and population growth (the HII index),
B. The degree to which station area populations are vulnerable to increased housing demand (the HRI index),
C. Program eligibility for a variety of place-based and affordable housing subsidies, and
D. The gap between housing supply and demand for household income ranges by tenure type.

Taken together, these metrics offer a detailed view of housing conditions in each proposed station area. The results of the analysis should be used by local governments and stakeholders with an interest in positive housing security outcomes in each station area as they devise and deploy strategies to preserve and promote affordable housing.

The following section offers the results of this analysis on a two-page profile for each station. The data tables included on the second page include both the average HII and HRI index values of all census tracts within the 1-mile station radius. The rank of the station area census tracts relative to all census tracts in the three-county study region (Palm Beach, Broward, and Miami-Dade) is included for reference.

The housing gap analysis shows the total number of housing units, by tenure type, that are affordable to each household income bracket (0-30% AMI, 30.1 – 60% AMI, 60.1-120% AMI). If a number is negative, that means there is a shortage of affordable units.

Given the breadth of data produced for each station, it is overwhelming to include a map for each index for each station profile. For this reason, we selected only one map for each station area: HII index values by census tract, including a layer for designated Opportunity Zone census tracts. Higher values on the HII indicate a poor outcome for residents – higher numbers indicate rapid rate of population change between 2010 and 2017, a meaningful increase in the share of cost burdened population, and the change in median gross rent between 2010 and 2017. For the map, darker areas indicate higher values (bad), and lighter areas indicate lower values (good). We also produced HRI maps for each station area; included in the appendix for reference.

Using the HII, HRI, program eligibility, and gap analysis figures, we offer suggested strategies for preserving or promoting affordable housing in each station area.

Finally, a brief narrative description of each station area, including major landmarks and critical trends in the data relative to other stations is also included.

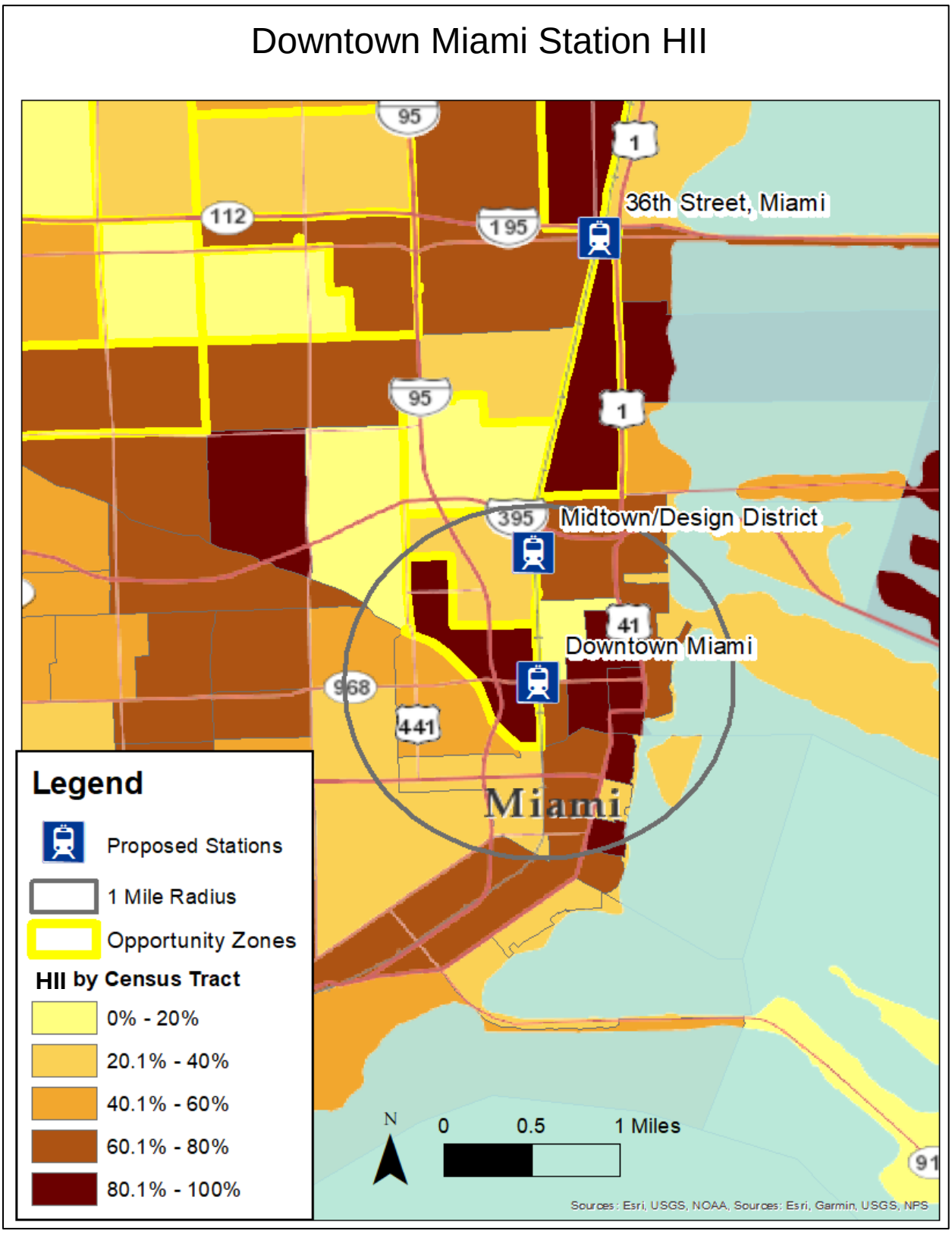


Figure 1. Downtown Miami Station HII.

Downtown Miami/Government Center

The Downtown Miami/Government Center Station is the most southern station on the line, located at the center of Downtown Miami. Most of the immediate census tracts have seen high growth, but a few lower growth areas place the station area as a whole at 52.9% HRI, near the middle of all station areas. It is located within Miami-Dade County.

The station area is the densest station area on the line. Immediately around the station are a swath of government buildings and offices. Within the 1-mile radius there are tens of thousands of owner and rental units. To the east is Biscayne Bay and the bridge to Miami Beach. There are fewer vacant parcels near the station than near most of the other stations, though there still are places that might be available for affordable housing development.

The Government Center station has some of the highest densities along the line, and thus some of the largest housing gaps. There has been a dramatic growth in the 60.1-120% rental housing stock compared to residents, while all other income groups have seen slow but positive narrowing of their housing gaps.

The station area is surrounded by designated Opportunity Zone census tracts, presenting developers with a readily available pool of long-term equity for commercial, mixed use, and residential development.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-646	660	1,067	-435	1,698	2,190
Renter	-4,585	2,723	11,730	-4,019	6,137	18,492

	Value	**Percent Rank**
Housing Instability Index	.031	52.9%
Household Resilience Index	.02	53.8%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, linkage fee ordinance, inclusionary housing policy, dedicated housing trust fund	

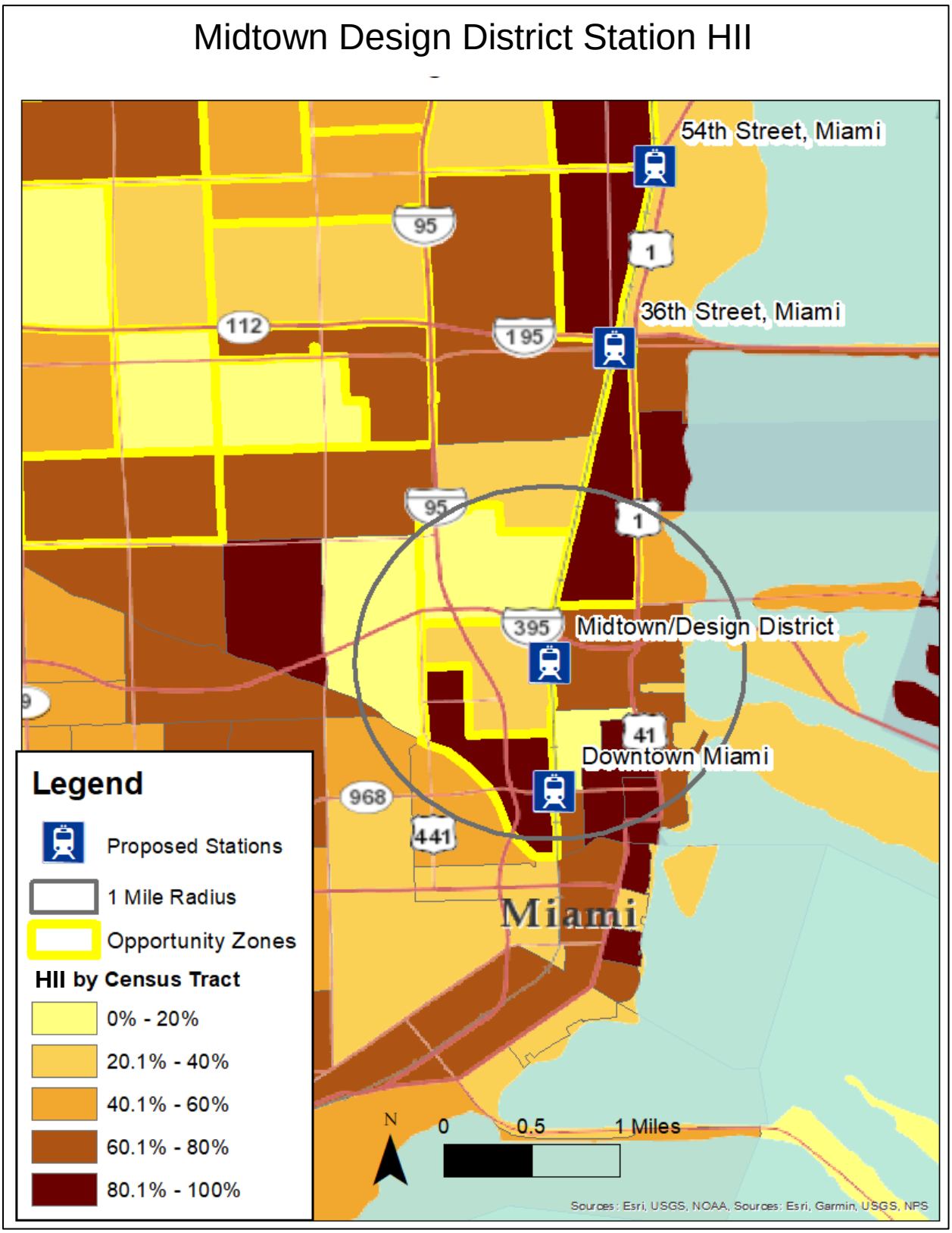


Figure 2. Midtown Design District HII.

Midtown Design District

The Midtown station sits less than a mile from the Downtown Miami station and thus shares many of the same census tracts. The area directly next to the station has a lower HII than the area directly adjacent to the Downtown Station, but because the 1-mile radius captures a few census tracts north of downtown, the HII for the station area as a whole is higher. This station is located within Miami-Dade County.

The station borders the Miami Design District, a commercially active district characterized by high end design, architecture, and art firms. However, the land directly adjacent to the station is vacant and would likely be a prime candidate for TOD and transportation joint development (TJD).

The area around the Midtown Station has seen a shrinking housing gap for all income groups, with nearly double the available housing units for most income groups except 0-30% income group, which has seen little change.

The station area is surrounded by designated Opportunity Zone census tracts, presenting developers with a readily available pool of long-term equity for commercial, mixed use, and residential development.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-401	628	1,274	-391	1,416	2,539
Renter	-2,972	2,625	9,583	-2,163	5,529	15,060

	Value	**Percent Rank**
Housing Instability Index	.036	56.8%
Household Resilience Index	-.31	42.5%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, linkage fee ordinance, inclusionary housing policy, dedicated Housing trust fund, zoning flexibility, ADU policy, robust surplus land policy, adaptive reuse	

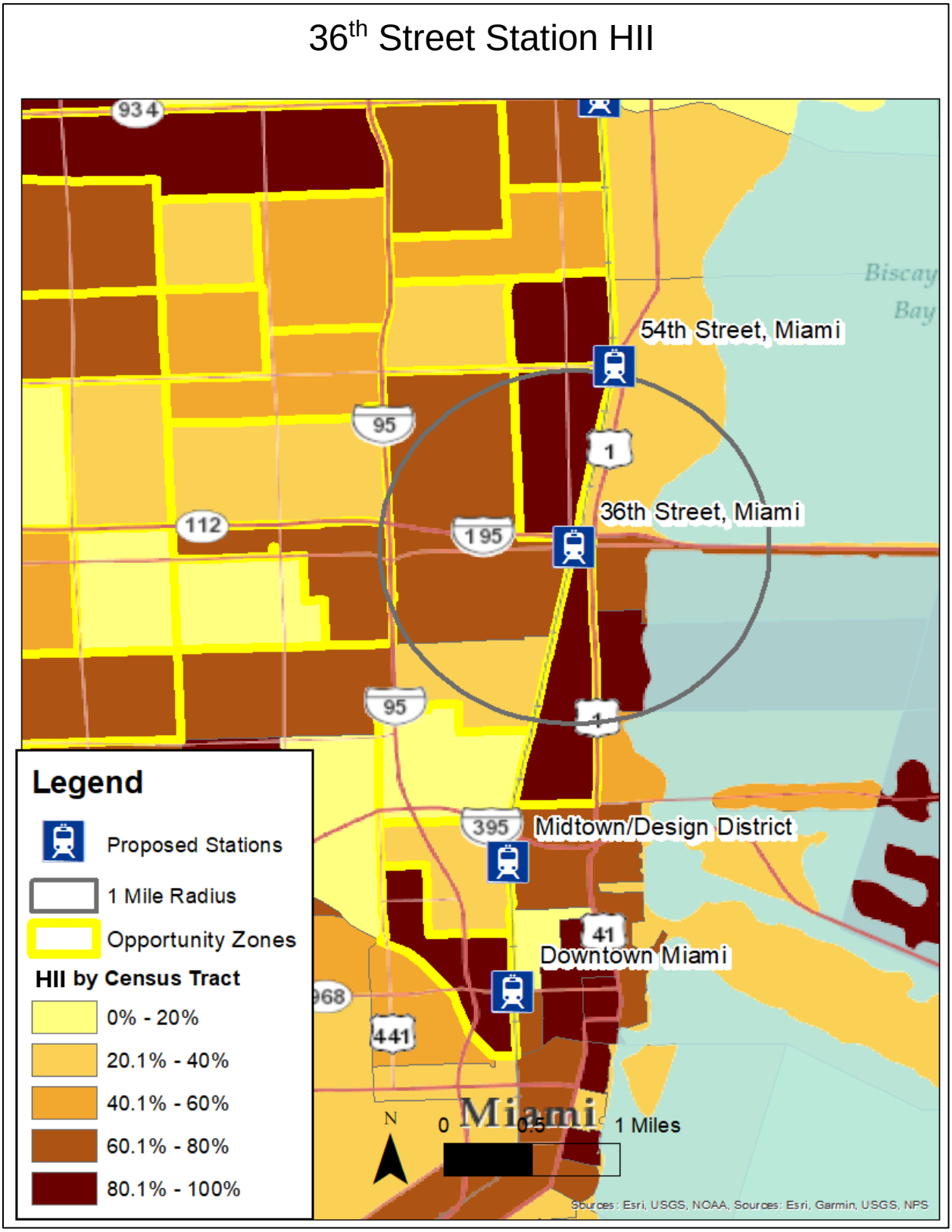


Figure 3. 36th Street HII.

36th Street

The 36th Street Station stands at the intersection of two major highways (95 and 195) and just north of some of the most "up and coming" neighborhoods in Miami, including Wynwood. North and south of the station are two extremely high HII neighborhoods. The HII is higher than either Midtown and Government Center, and the HRI is lower: that is the area round the 36th Street Station is growing more quickly and the residents are less likely to be able to cope than either of the downtown stations. This station is located within Miami-Dade County.

While the area within 1-mile radius is heavily developed, the area directly around the station is underdeveloped and has openings for TOD and TJD.

The housing gap has remained fairly flat, except extremely low-income homeowners, which have seen an increase in number of available units compared to the number of low-income residents.

As with most of downtown Miami, the station area is surrounded by designated Opportunity Zone census tracts, presenting developers with a readily available pool of long-term equity for commercial, mixed use, and residential development.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-402	606	1,486	-24	1,287	3,049
Renter	-2,016	-83	3,478	-2,029	90	5,237

	Value	**Percent Rank**
Housing Instability Index	.09	62.1%
Household Resilience Index	-.36	37.9%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policy, robust surplus land policy, adaptive reuse, employer assisted housing program, targeted code enforcement and rehabilitation	

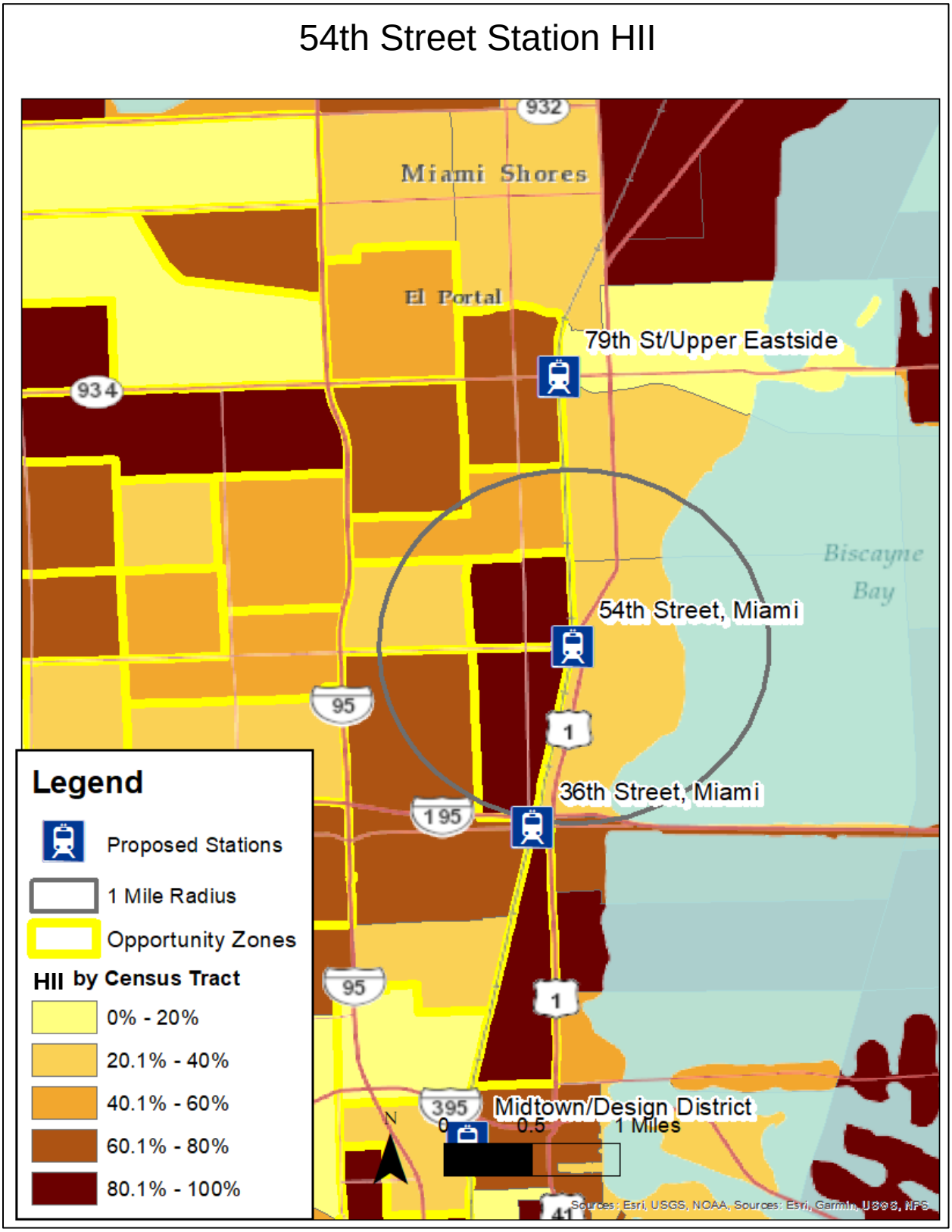


Figure 4. 54th Street HII.

54th Street Station

The 54th street station, on the corner of the Little Haiti, Morningside, and Upper East Side neighborhoods. The area has experienced increased housing pressure (HII) while the residents are among the poorest and most vulnerable of any of the station areas (HRI). The two census tracts directly to the west of the station area, in Little Haiti, have extremely high HIIs. This station is located within Miami-Dade County.

The 54th street station has seen dramatic increases in the availability of housing for almost all income groups and tenures, except for extremely low-income renters, who have seen a decrease in the number of rental homes affordable to them.

The 54th Street station is surrounded by open space and strip mall type development. Almost all of Little Haiti is covered by opportunity Zones, and so the majority of census tracts in the station area are Opportunity Zones.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
N	Y (Y)	Y	Y	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-283	391	1,014	99	790	2,154
Renter	-2,409	872	5,984	-2,551	1,878	9,663

	Value	**Percent Rank**
Housing Instability Index	.05	60.9%
Household Resilience Index	-.723	27.8%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policy, robust surplus land policy, adaptive reuse, employer assisted housing program, targeted code enforcement and rehabilitation	

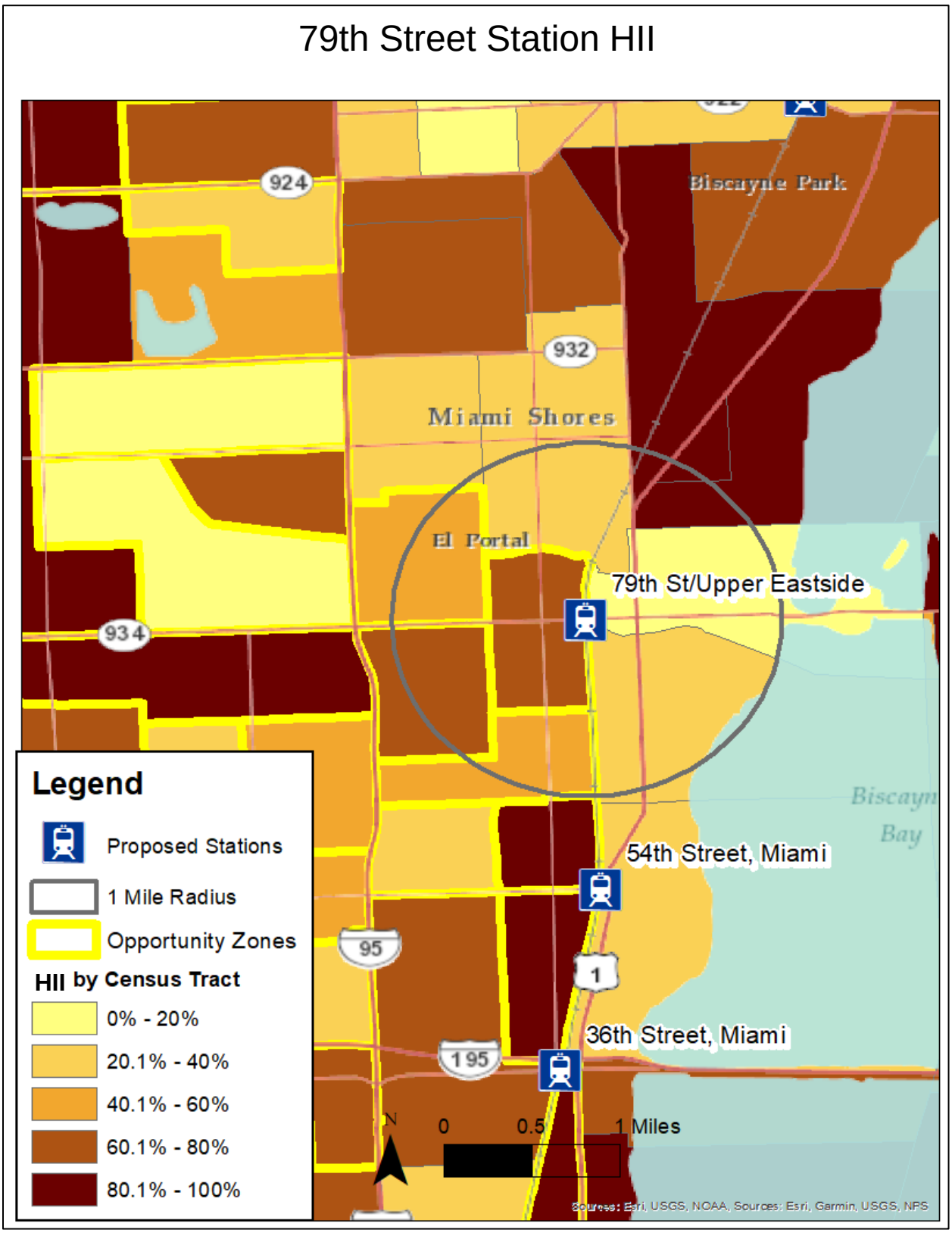


Figure 5. 79th Street HII.

79th Street

The 79th Street station stands at the corner of two smaller roads. The average HII in the station area is close to the average for all station areas in the three-county area, that is the area has grown on close to the same scale. However, people who live in the area are much poorer. This station is located within Miami-Dade County.

The area south of the station is covered in middle density neighborhoods and architecture and design services businesses. The area immediately around the proposed station is vacant, with several empty lots as well as a several abandoned buildings.

Low-income (30.1-60% AMI) and moderate income (60.1-120% AMI) saw more owner and rental units affordable per resident in those income brackets. However, low-income renters saw their gap grow.

While the 1-mile radius includes many wealthier developments to the north of Little Haiti, to the south west there are 4 Opportunity Zones.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-270	558	1,724	173	1,272	3,995
Renter	-2,827	1,323	6,531	-3,316	2571	10,936

	Value	**Percent Rank**
Housing Instability Index	.09	56.0%
Household Resilience Index	-.67	32%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policy, robust surplus land policy, adaptive reuse, employer assisted housing program, targeted code enforcement and rehabilitation	

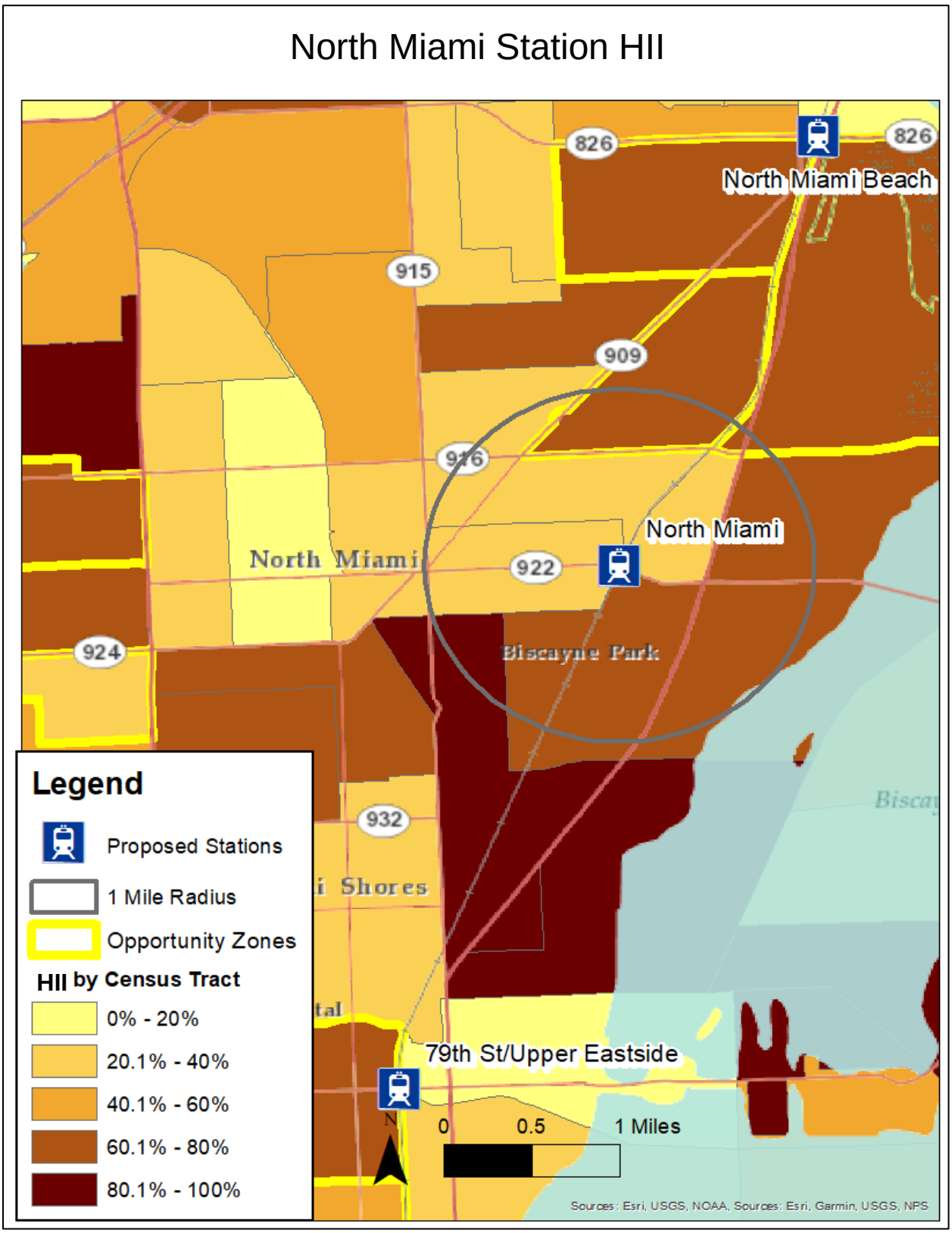


Figure 6. North Miami HII.

North Miami

The North Miami station, like the 79th street station, has a relatively average HII, but the residents are extremely vulnerable, i.e. they have an extremely low HRI. This station is located within Miami-Dade County.

The North Miami station is the first primarily suburban station north of Miami. The area is somewhat developed but at a fairly low density. The 1-mile radius includes sections of North Miami and Biscayne Park. To the north east of the station area is Johnson and Wales, University of North Miami.

The housing gap analysis shows an increase in the number available housing units in the low- and moderate-income groups, while the gap has increased for low-income renters: there are a predicted 400 fewer units in 2025 compared to 2017, on top of an already substantial gap.

While there are some Opportunity Zones to the north east of the station, there are fewer than around those stations to the south.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-328	982	2,414	-158	2,197	4,955
Renter	-2,609	-1,047	5,754	-3,075	-1,045	7,745

	Value	**Percent Rank**
Housing Instability Index	.03	54.2%
Household Resilience Index	-.52	30.6%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, inclusionary housing policy, ADU policy, robust surplus land policy, adaptive reuse, employer assisted housing program, targeted code enforcement and rehabilitation	

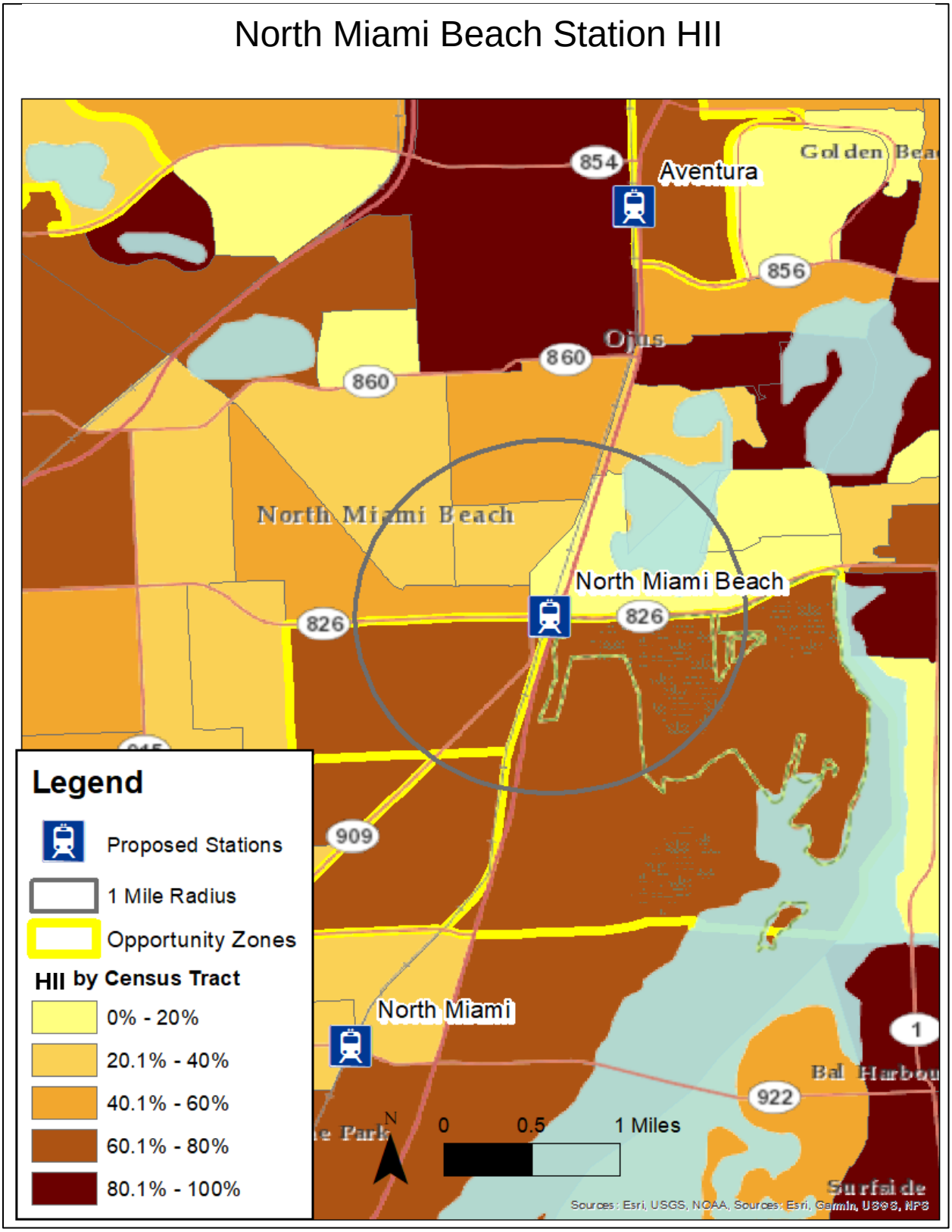


Figure 7. North Miami Beach HII.

North Miami Beach

For this portion of the Tri-Rail Costal Link, the train tracts run alongside Biscayne Boulevard and West Dixie Highway. The census tracts near the station have low HRIs but have also seen lower development (HIIs) than the most of the three-county area. The area north of the station has extremely low HIIs, while south of the stations most of the census tracts have HIIs higher than the area median. This station is located within Miami-Dade County.

The North Miami Beach station is located between downtown North Miami Beach and the Eastern Shores neighborhood. The area is suburban and fairly built up at a low density. The proposed station is located near the shore, and within the 1-mile radius area there are highly built up apartment and condo complexes.

According to the gap analysis, the gaps for extremely low- and low-income rental units have increased, while homeowners and moderate-income rental owners have seen a shrinking gap or a housing surplus.

Most of the area south of the station is covered by Opportunity Zones.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-702	1,645	4,545	-400	3,630	9,037
Renter	-2,359	-1,267	5,158	-3,092	-1,344	6,998

	Value	**Percent Rank**
Housing Instability Index	-.17	42.5%
Household Resilience Index	-.52	29.5%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policy, robust surplus land policy, adaptive reuse, employer assisted housing program, targeted code enforcement and rehabilitation	

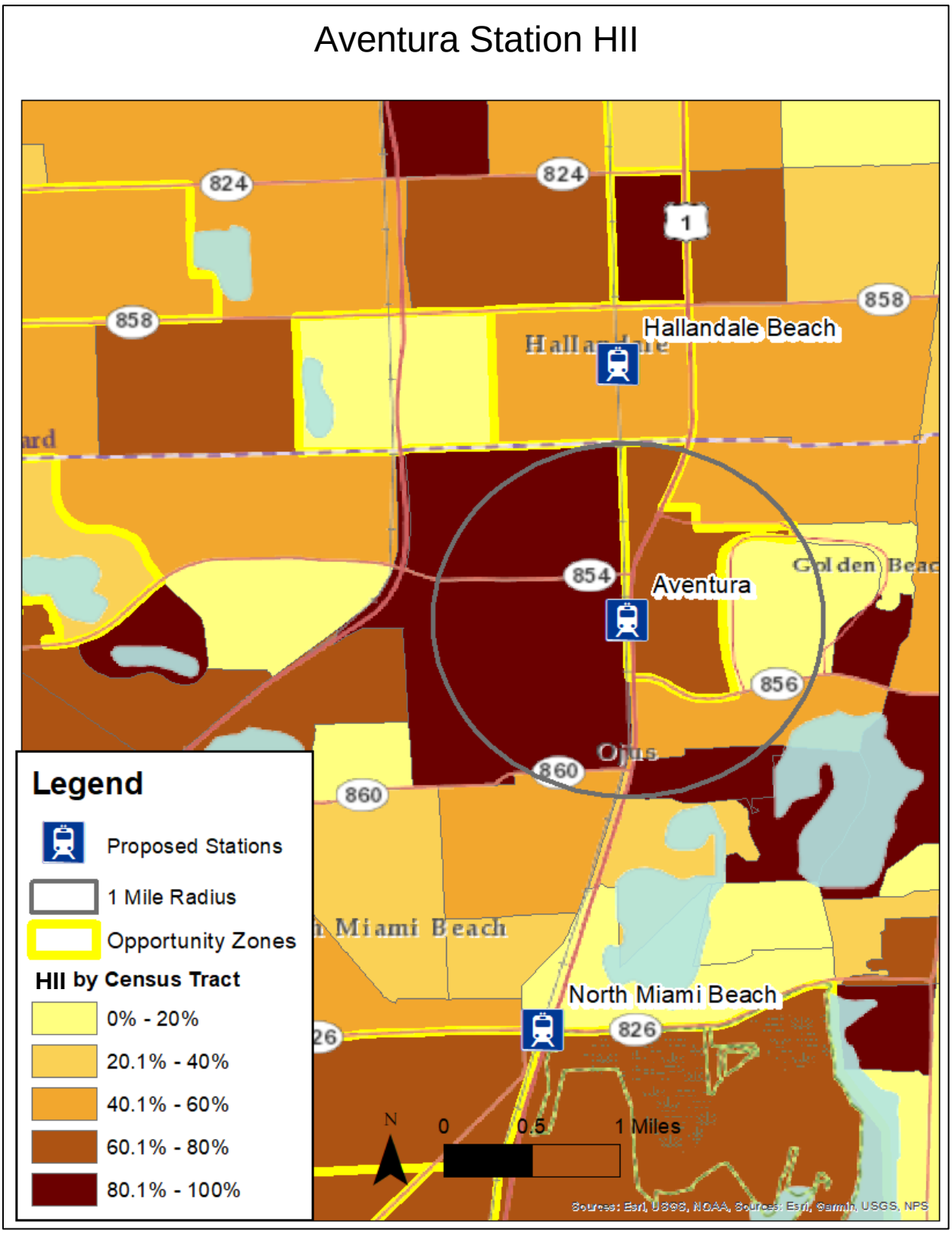


Figure 8. Aventura HII.

Aventura

The Aventura station is located near the Aventura Mall and within a mile of the Aventura Hospital and Medical Center. Both the HII and HRI of census tracts around the station are higher than the average, though HRI (wealth) is higher compared to the rest of the three-county area than HII (growth). The area to the west of the station, where there is new development, has a much higher HII than the area to the east, towards the shore and the mall, which is primarily commercial development. This station is located within Miami-Dade County.

The Aventura Station is located near 192nd Street NE, Aventura. The station area is primarily suburban, though a mid-density, multi-use development was just built across from the proposed station area, and there are several empty lots that could support TOD.

Aventura has seen stable housing gaps, except for low- and moderate-income homeowners who have seen a rising housing surplus.

There is only one Opportunity Zone within the 1-mile radius, however this is the census tract where the station will be located.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	N	Y	N	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-1,403	111	2,332	-1,253	1,113	4,946
Renter	-718	-569	174	-735	-572	210

	Value	**Percent Rank**
Housing Instability Index	.20	56.3%
Household Resilience Index	.51	69.2%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, dedicated housing trust fund, ADU policies, inclusionary housing policy, linkage fee ordinance	

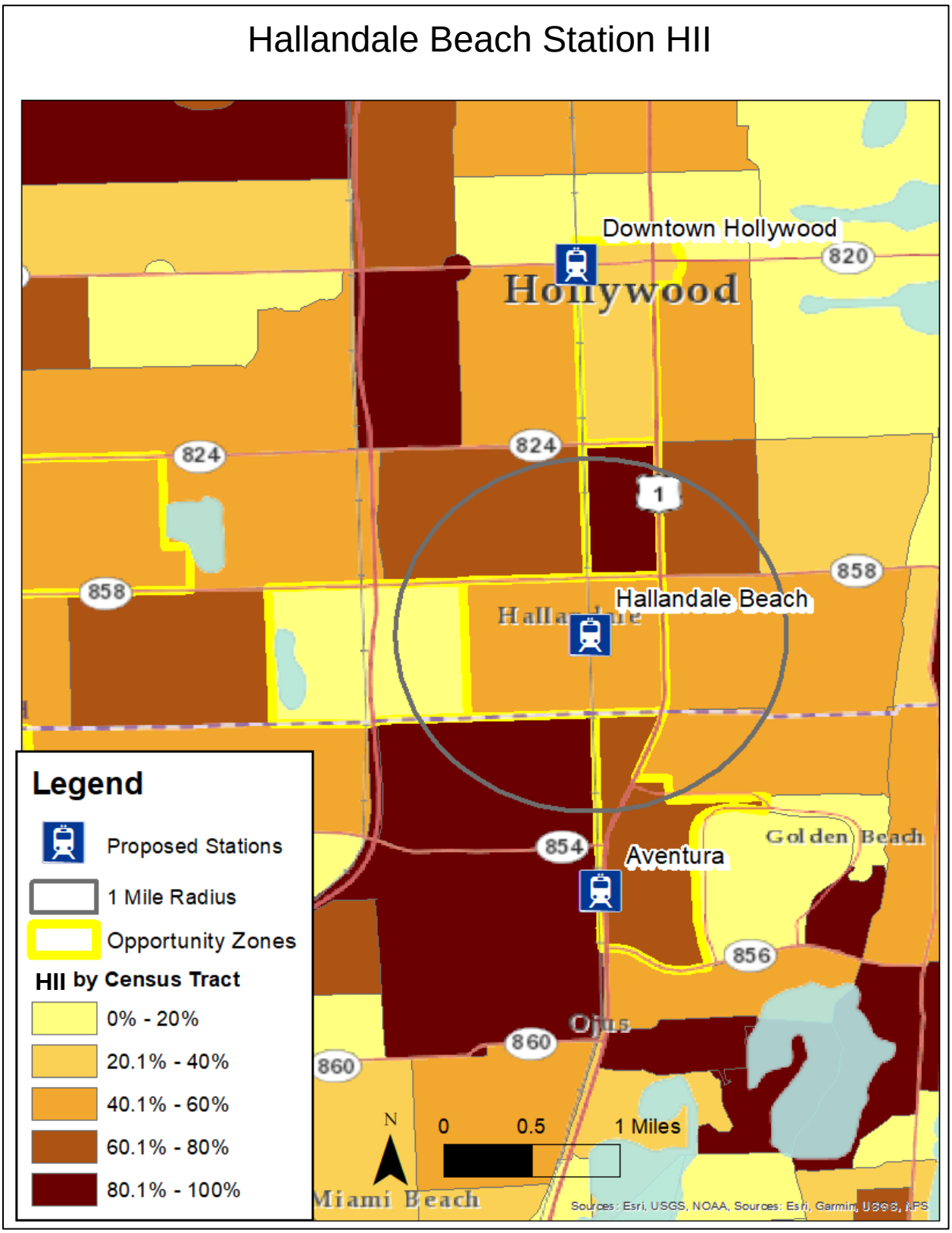


Figure 9. Hallandale Beach HII.

Hallandale Beach

Hallandale Beach is located about a mile north of the Aventura station. The HII is higher around the Hallandale Beach station than in the tri-county area, while the HRI is lower. HRI is higher to the south of the station and lower in the north. To the north east of the station there is a small, dense station area where the HII is in the top quintile while HRI is in the bottom two quintiles which is also an Opportunity Zone. This station is located in Broward County.

The area around the station area is suburban and medium density. The station is located along Dixie Highway, somewhat away from the nearby major highways.

Extremely low- and low-income renters are predicted to see a rising housing gap, while homeowners and moderate-income renters have seen narrowing gaps or rising surpluses.

There are several Opportunities Zones around the station area, and the station is directly located within an Opportunity Zone.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	N	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-550	764	3,746	-73	2,080	5,712
Renter	-1,807	-1,450	3,278	-2,135	-2,506	4,016

	Value	**Percent Rank**
Housing Instability Index	.17	62.5%
Household Resilience Index	-.12	43.7%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, inclusionary housing policy	

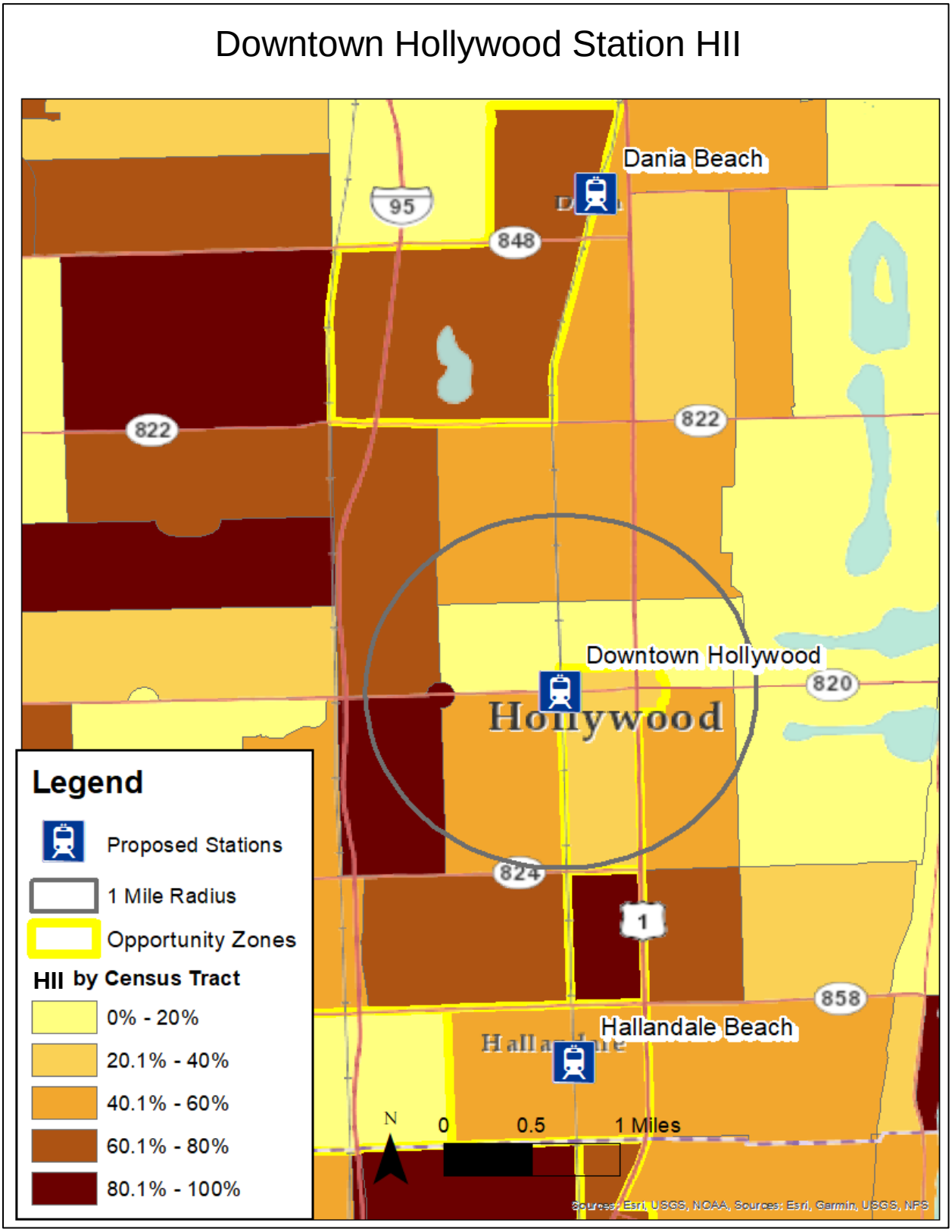


Figure 10. Downtown Hollywood HII.

Downtown Hollywood

The Downtown Hollywood station area has both an extremely low HII and an extremely low HRI: it has seen very low growth and the residents would be vulnerable to displacement should there be growth. The station is located in an Opportunity Zone, but there are few other Opportunity Zones within the station area. The area directly around the station has seen some of the lowest growth in the tri-county area, with only a few census tracts on the edge of the 1-mile radius balancing out that lack or negative growth. This station is located in Broward County.

Downtown Hollywood has seen one of the most dramatic housing gaps for extremely low-income renters and homeowners: the housing gap is predicted to continue to grow nearly to nearly 10,000 fewer rental units and over 3,000 fewer homeowner units than residents by tenure in 2025.

The Downtown Hollywood station is located in the heart of Hollywood. To the east is a traditional small town, and to the west is a set of large apartment buildings. Most of the area within the 1-mile radius is suburban.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	N	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-40	625	2,359	-3,137	1,086	1,213
Renter	-2,216	-1,406	4,863	-9,556	-2,207	10,273

	Value	**Percent Rank**
Housing Instability Index	-.13	40.6%
Household Resilience Index	-.30	36.5%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse	

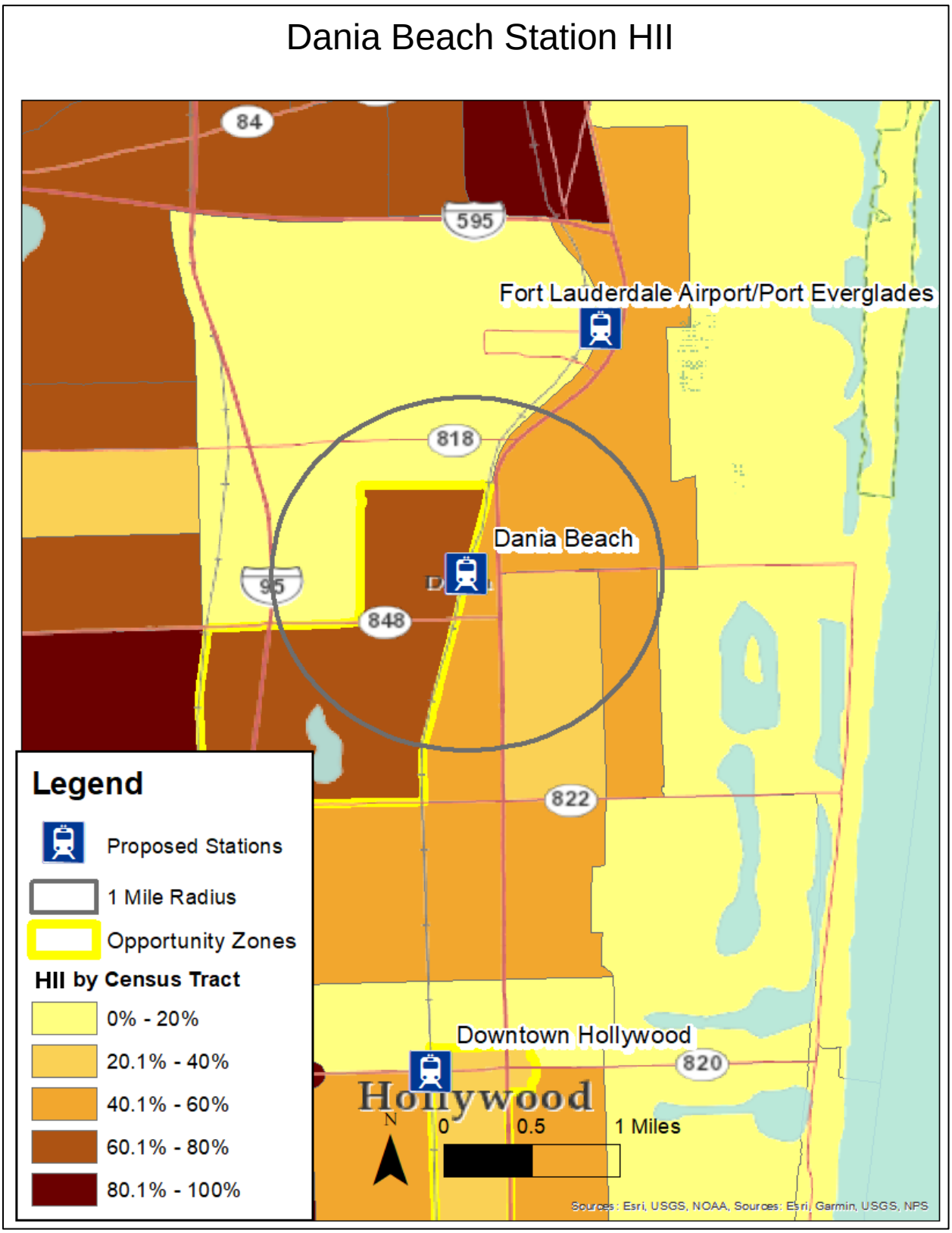


Figure 11. Dania Beach HII.

Dania Beach

The Dania Beach station area has below average HII and HRI. The area to the north of the station has an extremely low HII, but the stations that make up the city of Dania Beach have seen more moderate growth. This station is located in Broward County.

The Dania Beach station area is located to the east of downtown Dania Beach. The area directly around the station area is underdeveloped and industrial.

According to the gap analysis, Dania Beach has and will continue to see a dramatic increase in the housing gap for very-low and low-income renters and owners, with a rising surplus for moderate income renters and homeowners.

Because of its lower population densities, the Dania Beach station area contains fewer census tracts than most of the other stations. The census tract the station is located in is an Opportunity Zone, though there are no other Opportunity Zones within the 1-mile radius.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (N)	Y	Y	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-213	87	1,255	-2,104	120	1,455
Renter	-1,059	-485	1,903	-4,721	-606	4,170

	Value	**Percent Rank**
Housing Instability Index	-.17	41.0%
Household Resilience Index	-.17	45.9%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse	

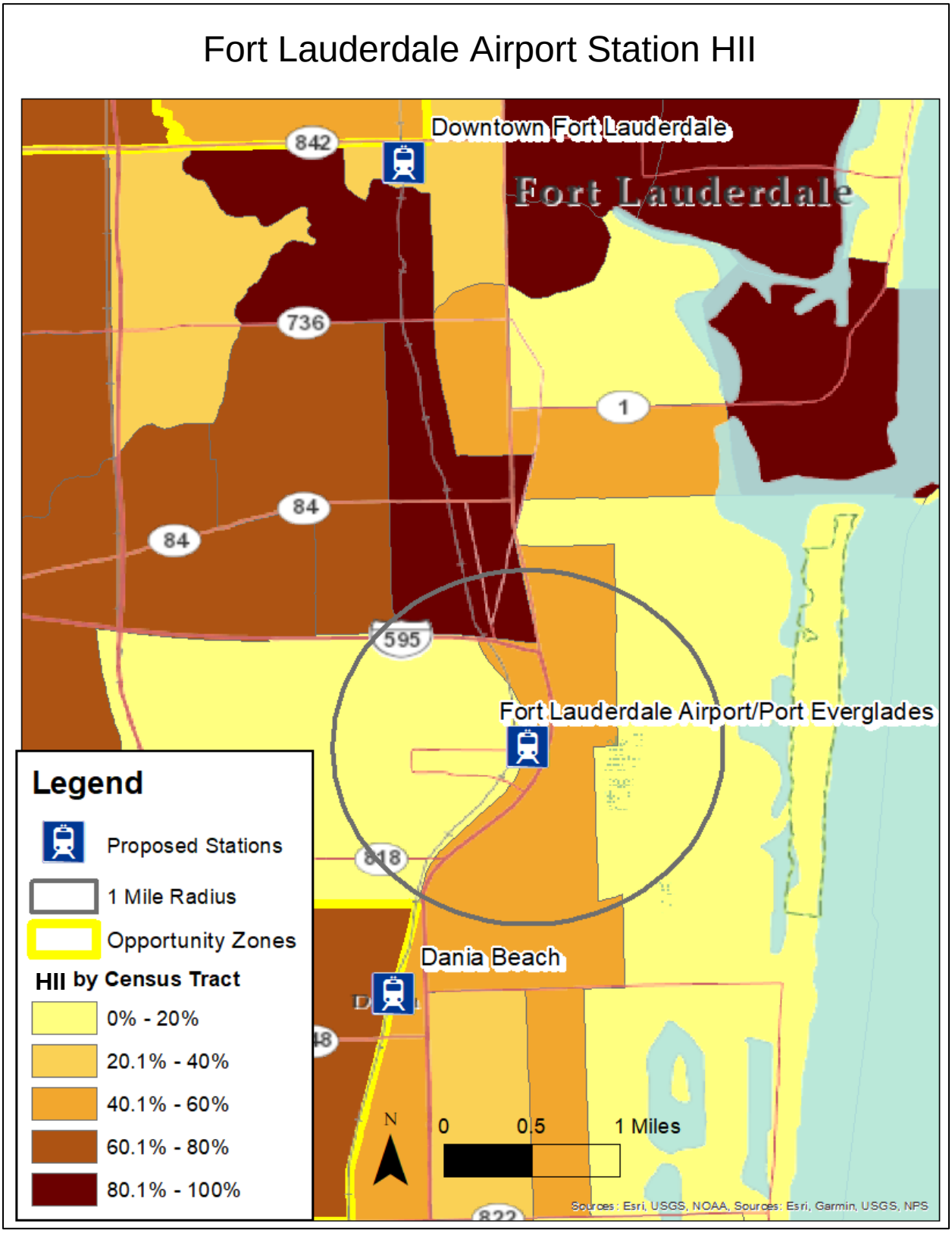


Figure 12. Fort Lauderdale Airport HII.

Fort Lauderdale Airport

The area around the Fort Lauderdale Airport station has very few residents or residences. The HII and HRI for the Fort Lauderdale Airport are close to the average across the three-county area, though this is starting from a low threshold. This station is located in Broward County.

The station is located on the premise of the airport, towards the shore. To the west and south, along the shore, there are series of state parks. Most of the homes are located to the south and east, in the Avon Park and Melaleuca Gardens neighborhoods.

The Fort Lauderdale Airport has seen a small increase in the housing gap for all renters and a small decrease in the gap for homeowners.

This is one of the few stations that has no Opportunity Zones within the 1-mile radius.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
N	Y (Y)	N	Y	N	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-19	82	802	156	370	1,160
Renter	-458	-451	984	-683	-901	883

	Value	**Percent Rank**
Housing Instability Index	-.07	48.9%
Household Resilience Index	-.08	45.7%
Suggested Strategies	School system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse	

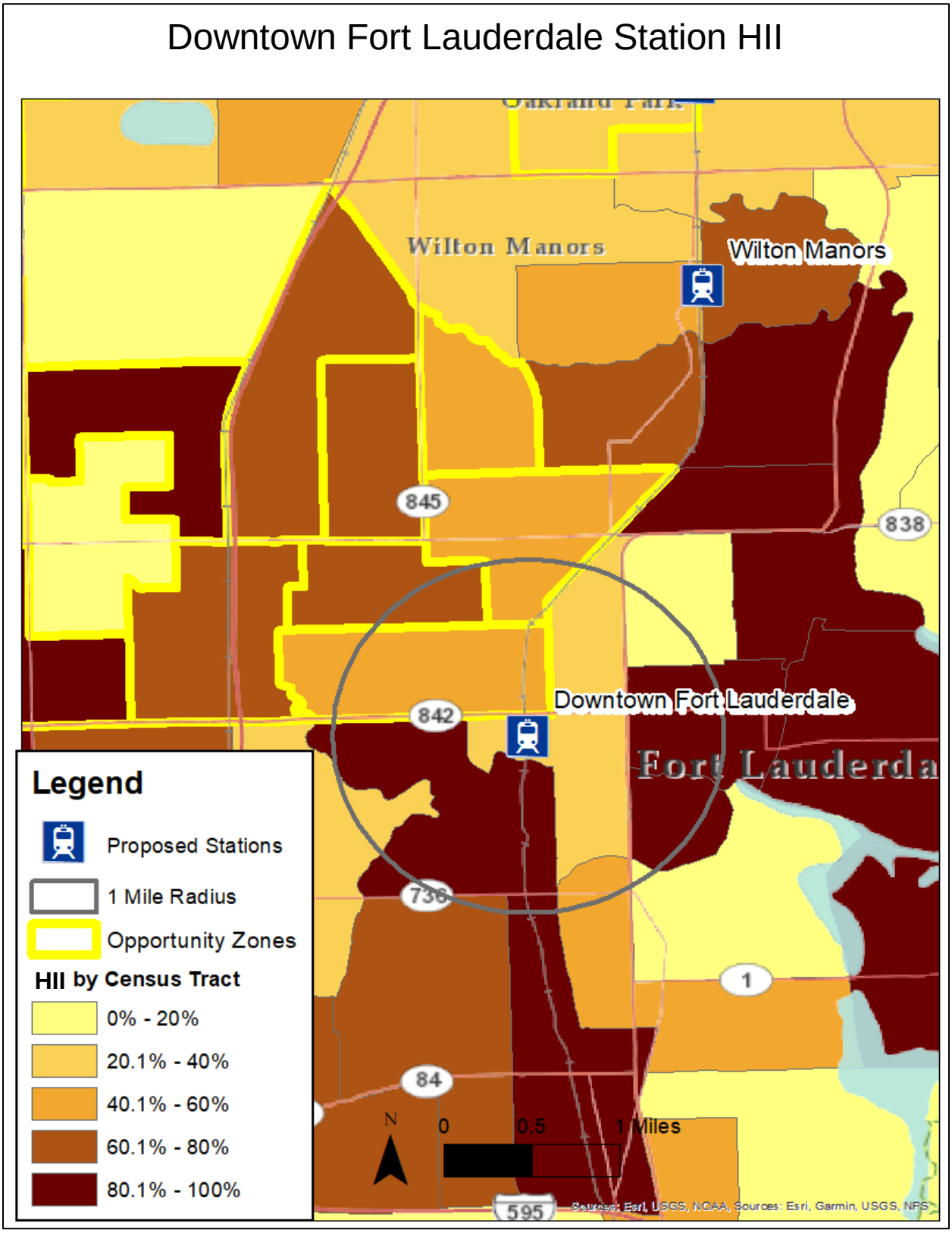


Figure 13. Downtown Fort Lauderdale HII.

Downtown Fort Lauderdale

The Downtown Fort Lauderdale station has seen growth comparable to the three-county area and the people that live in the census tracts have HIIs and HRIs near the median. However, census tracts within the 1-mile radius vary wildly, Downtown Fort Lauderdale contains some of the fastest growing and slowest growing census tracts on the line, as well as some of the most and least vulnerable. This station is located in Broward County.

The station is located to the east of downtown in the City View neighborhood.

Owners have seen a shrinking housing gap, while renters have seen a growing gap between the number of units affordable to residents within each income bracket and the residents actually in those brackets.

North of the station is extremely vulnerable (low HRI) and there are Opportunity Zones covering most of this area, in the Durrs, Dorsey, and Central Fort Lauderdale neighborhoods.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
N	Y (Y)	Y	N	N	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-294	-551	1,096	-184	-212	1,571
Renter	-2,802	-1,527	5,963	-3,583	-3,226	7,044

	Value	**Percent Rank**
Housing Instability Index	.02	54.4%
Household Resilience Index	-.06	49.9%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, linkage fee ordinance, inclusionary housing policy, dedicated housing trust fund	

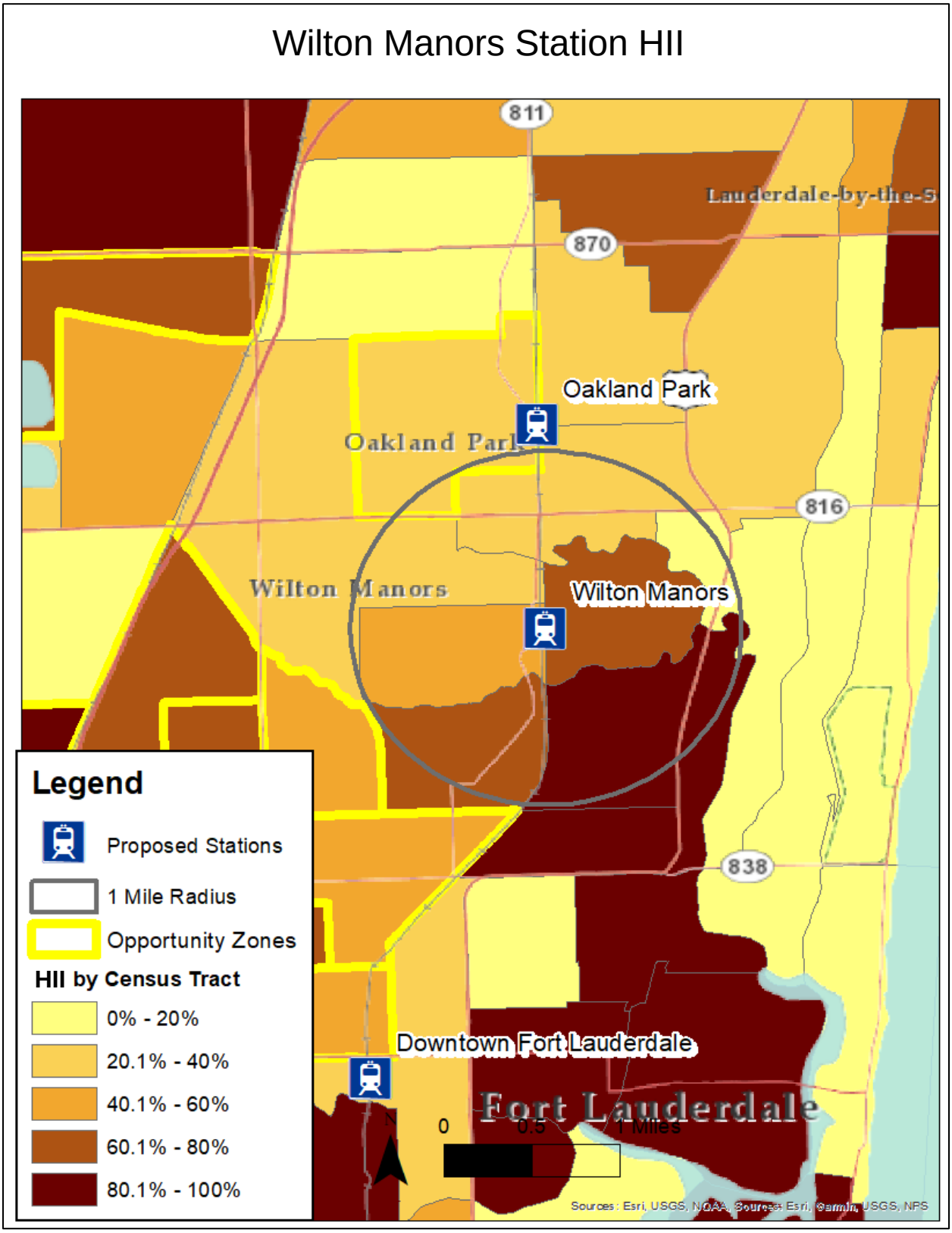


Figure 14. Wilton Manors HII.

Wilton Manors

Wilton Manors itself, to the east and north of the station, has seen a fairly low HII, while the area south of the station (including the census tract the station is located in) have fairly high HIIs. However, Wilton Manors has a high HRI: the Wilton Manors station area has seen less growth in higher income areas, and more growth in lower-income areas. This station is located in Broward County.

The gap analysis shows a fairly even gap: there are fairly small changes predicted between 2017 and 2025, except for rentals in the 30.1-60% AMI threshold, which should see a widening gap.

The gap for low-income owners and renters has actually shrunk in Wilton Manors, different from most of the station areas. The only income group and tenure type to see an increased gap in Wilton Manors was low-income (30.1-60%) renters.

There is only one Opportunity Zone within the 1-mile radius, to the extreme north of the station, near the next station, Oakland Park.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
N	N	Y	N	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-311	-54	819	-232	340	832
Renter	-1,227	-1,308	3,410	-1,216	-2,573	3,345

	Value	**Percent Rank**
Housing Instability Index	-.10	46.7%
Household Resilience Index	.23	58.9%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, targeted code enforcement and rehabilitation program, dedicated housing trust fund	

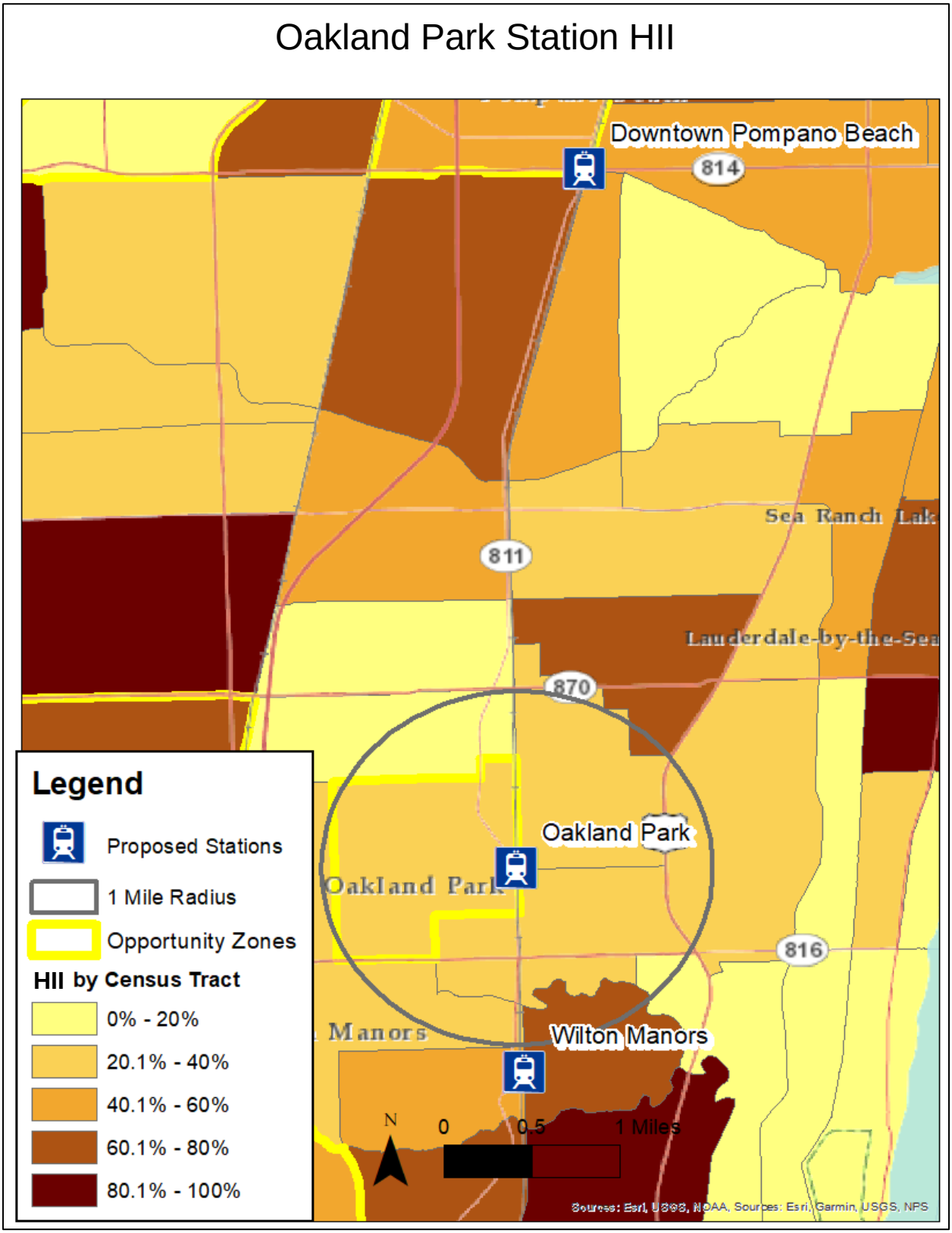


Figure 15. Oakland Park HII.

Oakland Park

The Oakland Park station area has among the lowest HRIs along the entire line, in the 30th percentile among all census tracts in the three counties the rail serves. The area HRI is average, but the census tract the station is located in is an Opportunity Zone and an extremely low HRI. This station is located in Broward County.

The Oakland Park station is located to the east of Oakland Park's downtown.

Oakland Park has seen and will continue to see flat housing gaps.

There is only one Opportunity Zone within 1-mile radius, but it is the census tract the station is located in.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (N)	Y	N	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-176	290	721	347	1,057	501
Renter	-1,220	-1,459	3,450	-1,201	-2,459	3,520

	Value	**Percent Rank**
Housing Instability Index	-.27	30.6%
Household Resilience Index	.17	56.6%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, dedicated housing trust fund	

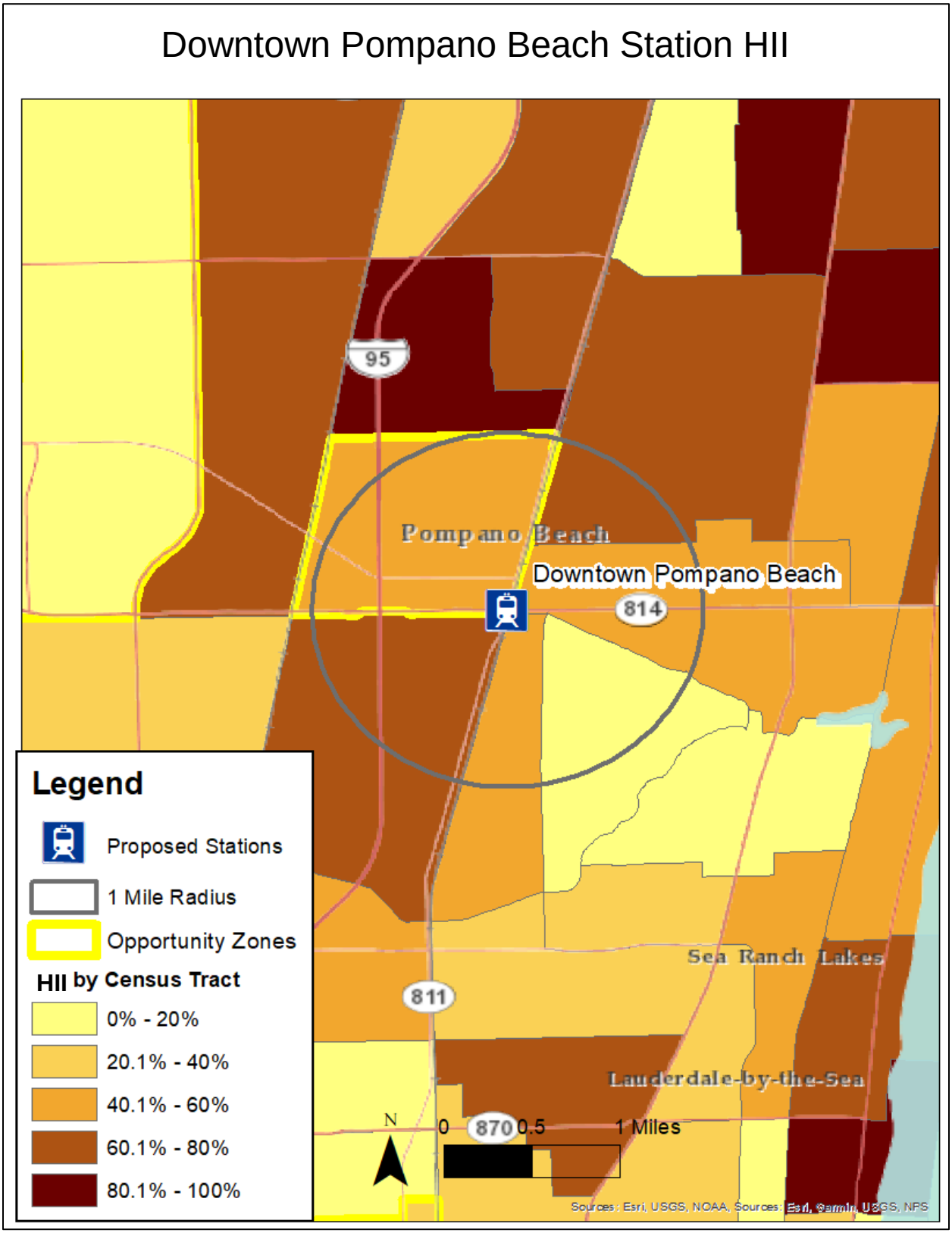


Figure 16. Downtown Pompano Beach HII.

Downtown Pompano Beach

Downtown Pompano Beach has HII near the median for the three counties but has an HRI of 25%: its residents are among the poorest in the area. This is especially true for the census tract the station is located in that extends to the north east. This station is located in Broward County.

The station is mildly to the south of Pompano Beach, near the intersection of East Atlantic Boulevard and North Dixie Highway.

Downtown Pompano Beach has seen stable housing gaps, except for low-income renters that have seen a major increase in the gap.

The station is in an Opportunity Zone.

Program Eligibility					
LMISD?	**CRA (TF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	Y	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-40	473	1,331	-9	1,444	1,717
Renter	-1,435	-1,537	3,573	-1,571	-3,034	4,623

	Value	**Percent Rank**
Housing Instability Index	-.06	53.2%
Household Resilience Index	-.72	25.0%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, targeted code enforcement and rehabilitation program	

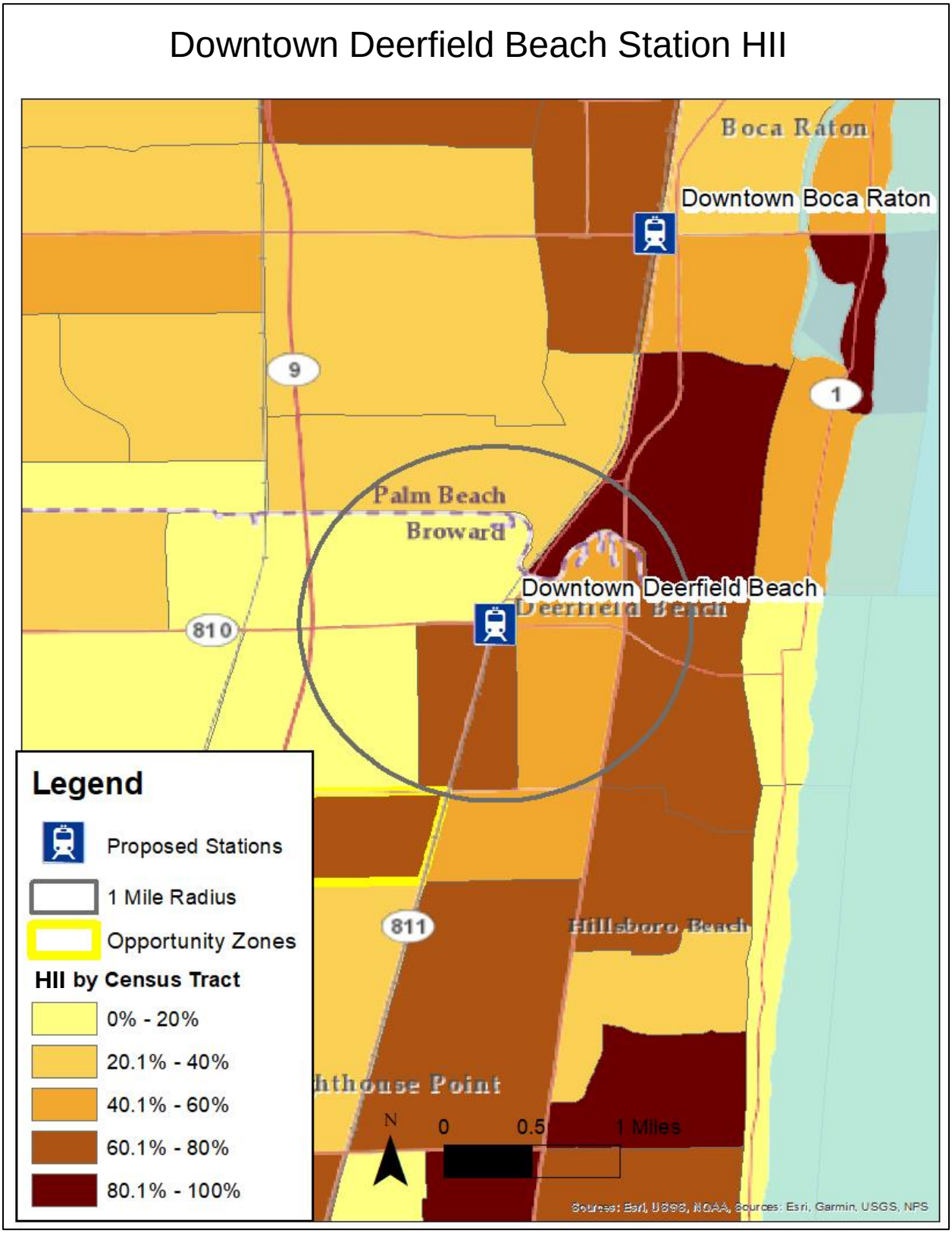


Figure 17. Downtown Deerfield Beach HII.

Downtown Deerfield Beach

Downtown Deerfield Beach has a fairly median HRI and HII: the census tracts to the east of the station has higher HIIs and HRIs, while the area to the west of the station has grown more slowly and is more vulnerable. This station is located in Broward County.

The station is located in downtown Deerfield Beach at the intersection between 811 and East Hillsboro Boulevard. The area is suburban.

The housing gap is expected to rise dramatically between 2017 and 2025 for extremely low- and low-income renters, while shrinking for moderate income renters and homeowners.

There are no Opportunity Zones in the Deerfield Beach station area 1-mile radius.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	N	N	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-194	1,086	1,754	1,083	2,548	1,046
Renter	-1,035	-844	2,922	-2,070	-1,688	5,844

	Value	**Percent Rank**
Housing Instability Index	-.07	50.3%
Household Resilience Index	-10.7	44.0%
Suggested Strategies	School system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, linkage fee ordinance, inclusionary housing policy	

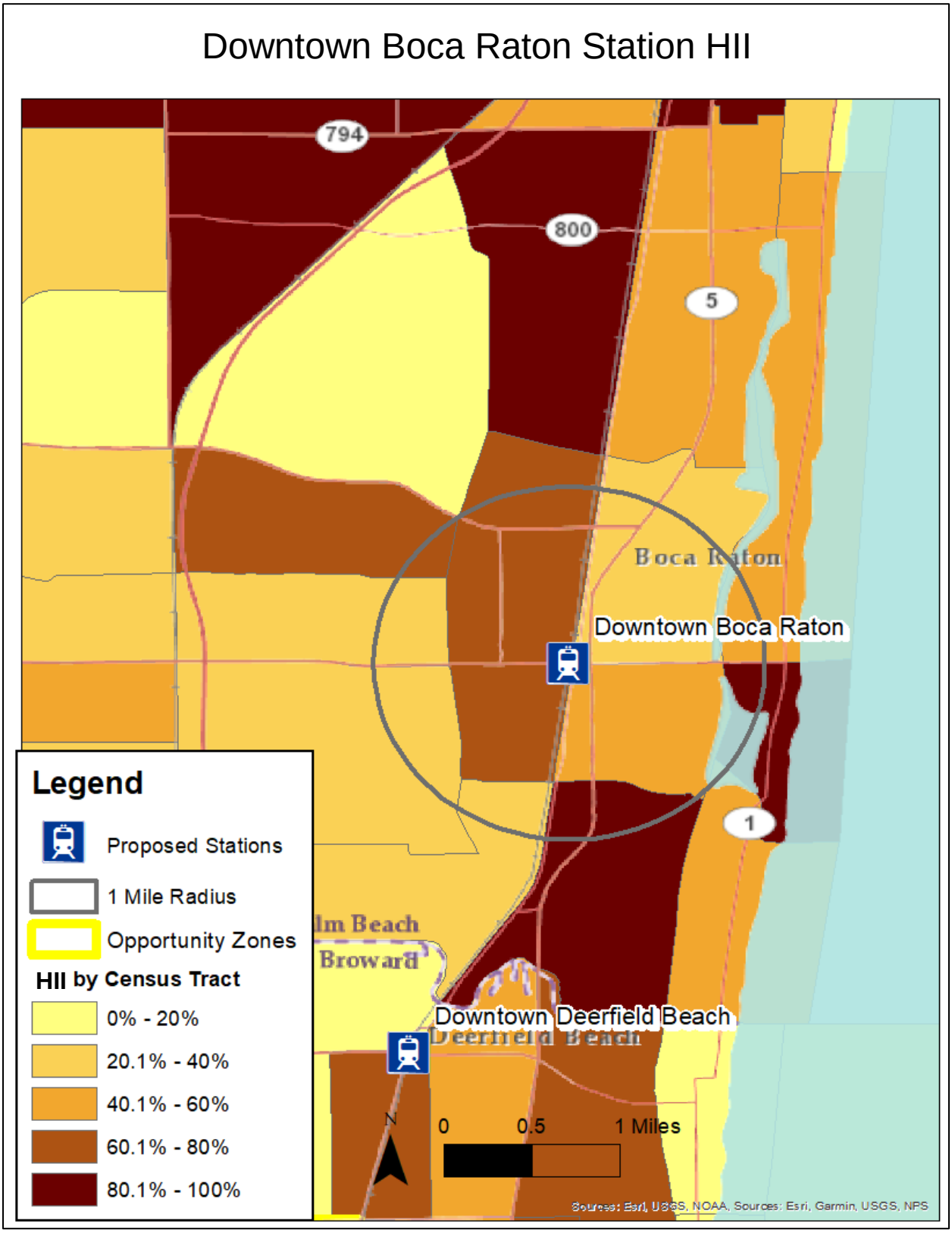


Figure 18. Downtown Boca Raton HII.

Downtown Boca Raton

The Boca Raton has HIIs comparable to the region as a whole; though HIIs are moderately higher in those census tracts to the west of the station rather than those towards the shore. The Boca Raton station area has one of the highest HRIs along the line. This station is located in Palm Beach County.

The Boca Raton station is to the south of downtown Boca Raton, near the shore. The immediate area is new development and medium high density, surrounded by suburban development.

The Boca Raton Station has seen a growing housing gap for very low- and low-income renters and, unusually, high income homeowners. Very low- and low-income homeowners, and moderate-income renters have seen a shrinking affordability gap or a rising surplus.

The Boca Raton station, as the station with the richest and most educated residents, does not have an Opportunity Zone nearby.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	N	N	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-397	-95	541	21	791	-60
Renter	-720	-834	1,192	-1,440	-1,668	2,384

	Value	**Percent Rank**
Housing Instability Index	-.03	50.0%
Household Resilience Index	.66	74.6%
Suggested Strategies	School system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, dedicated housing trust fund, inclusionary housing policy, linkage fee ordinance	

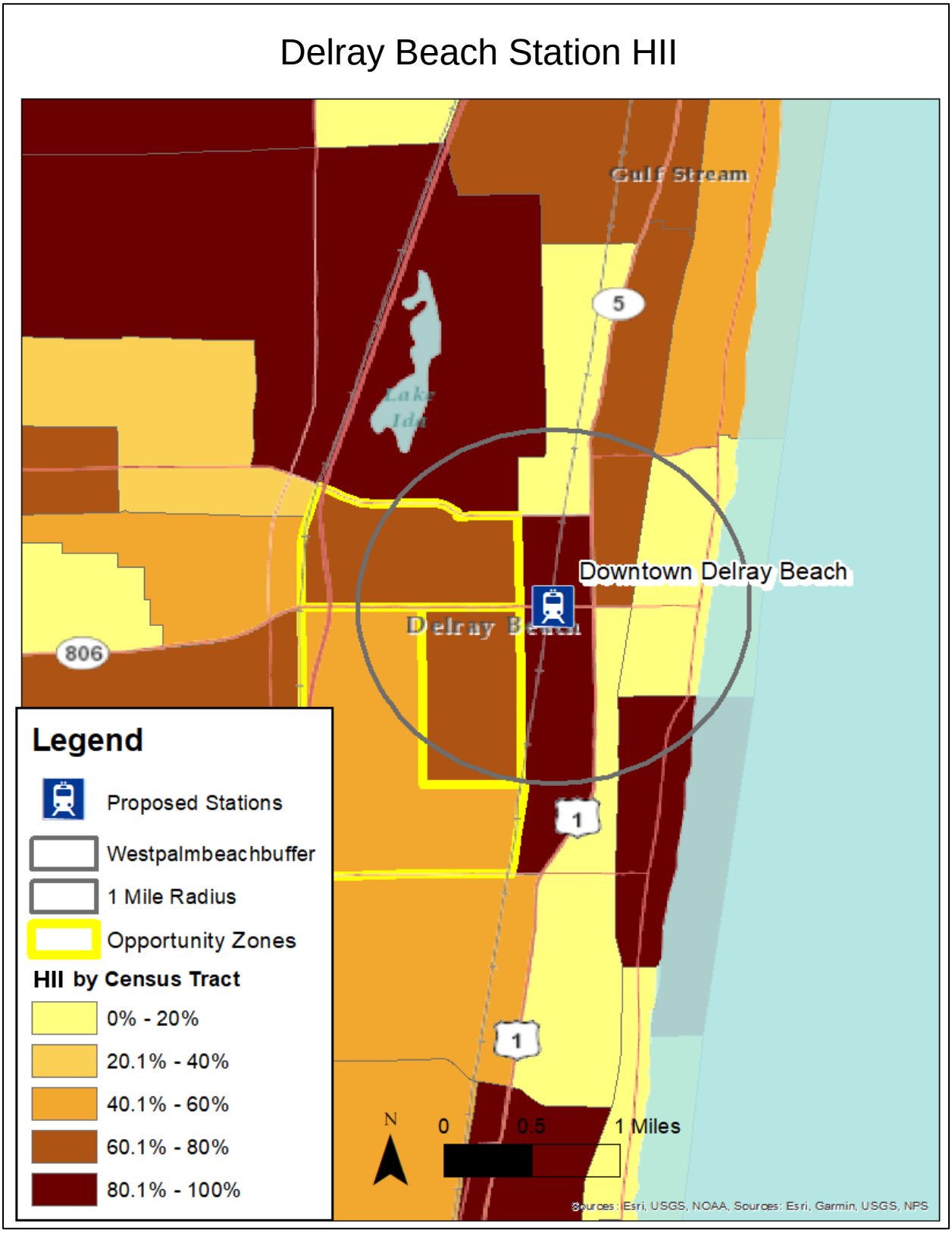


Figure 19. Delray Beach HII.

Downtown Delray Beach

The census tracts where the Downtown Delray Beach station is located along with those directly to the west of the station have experienced extremely high HIIs, although the station has a whole is only mildly above the median across the three counties. The HRI is the inverse: the area near the shore has a high HRI, while the fast-growing areas closest and to the west of the station have relatively low HRIs, possibly indicating gentrification. This station is located in Palm Beach County.

The proposed station will be located in a fairly built up, medium density downtown/town center.

The housing gap in Delray Beach has shrunk for all income/tenure groups besides extremely low- and low-income renters, who have seen the gap double, meaning there are now far fewer available homes than households seeking homes at those price points.

The area to the west of Downtown Delray Beach contains two Opportunity Zones.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	N	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-448	236	1,484	-232	1,092	1,994
Renter	-716	-426	1,334	-1,432	-852	2,668

	Value	**Percent Rank**
Housing Instability Index	.02	57.5%
Household Resilience Index	.23	58.8%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, dedicated housing trust fund	

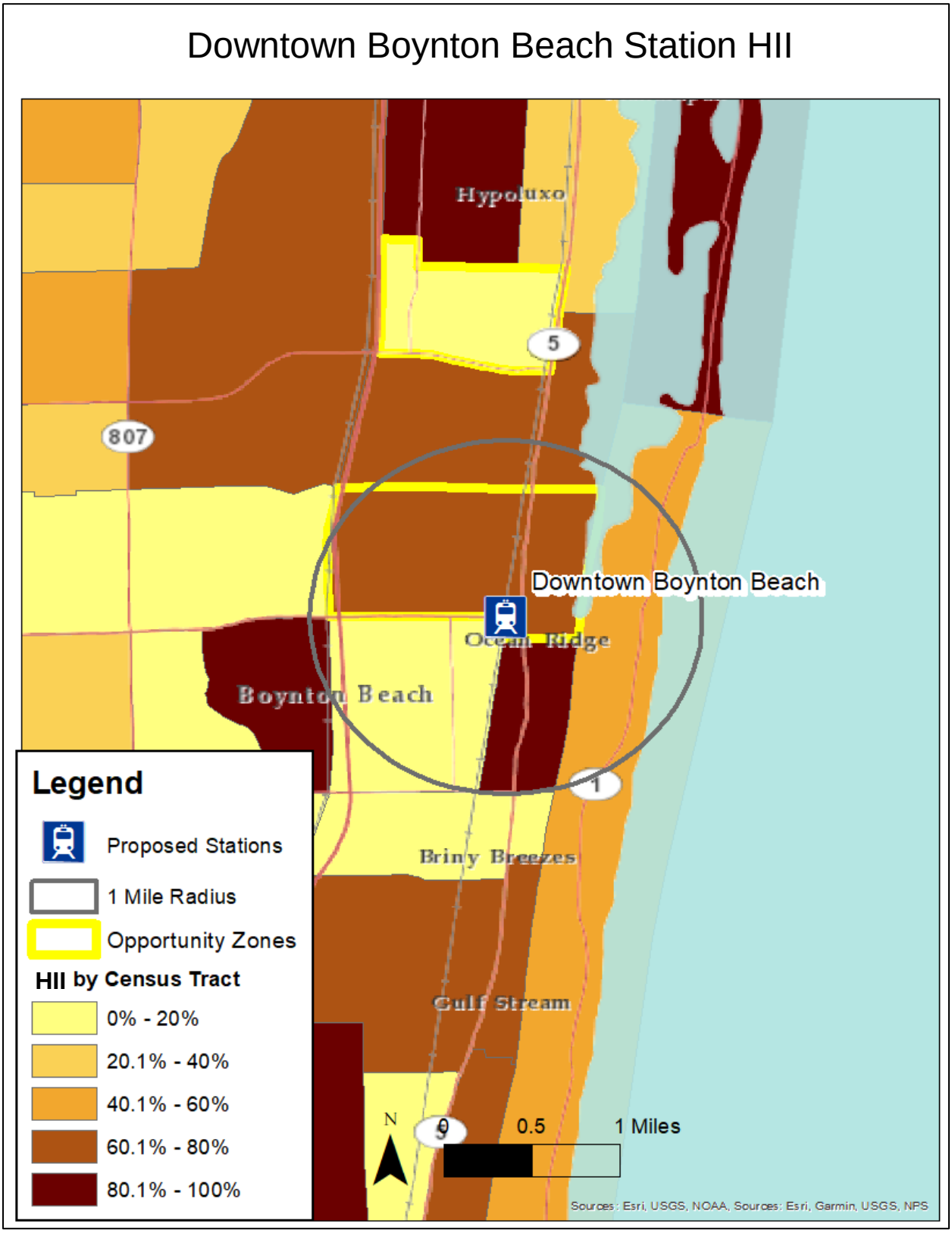


Figure 20. Downtown Boynton Beach HII.

Downtown Boynton Beach

The Boynton Beach station area has an average HII of 54.1%, close to the median for the area as a whole. However, this growth is concentrated in the census tract to the south east, just to the north (in an Opportunity Zone), and to the far west, at the edge of the 1-mile radius. The average HRI for the area was an incredibly low 28.7%, meaning the residents are extremely vulnerable to displacement. The census tracts directly around the station and inshore are some of the poorest along the entire line. This station is located in Palm Beach County.

The area around the station is a mixture of condos and suburban development. The Boynton Beach Town Center is located to the west of the proposed station area.

There has been a huge increase in the number of homeowner units available per resident in all three income brackets. The rental gap has and should continue to hold fairly steady.

The station is located in an Opportunity Zone that stretches into the area north of the station.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	Y	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	71	1,909	3,523	782	4,190	6,633
Renter	-707	-825	1,237	-772	-837	1,008

	Value	**Percent Rank**
Housing Instability Index	.07	54.1%
Household Resilience Index	-.54	28.7%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, targeted code enforcement and rehabilitation program	

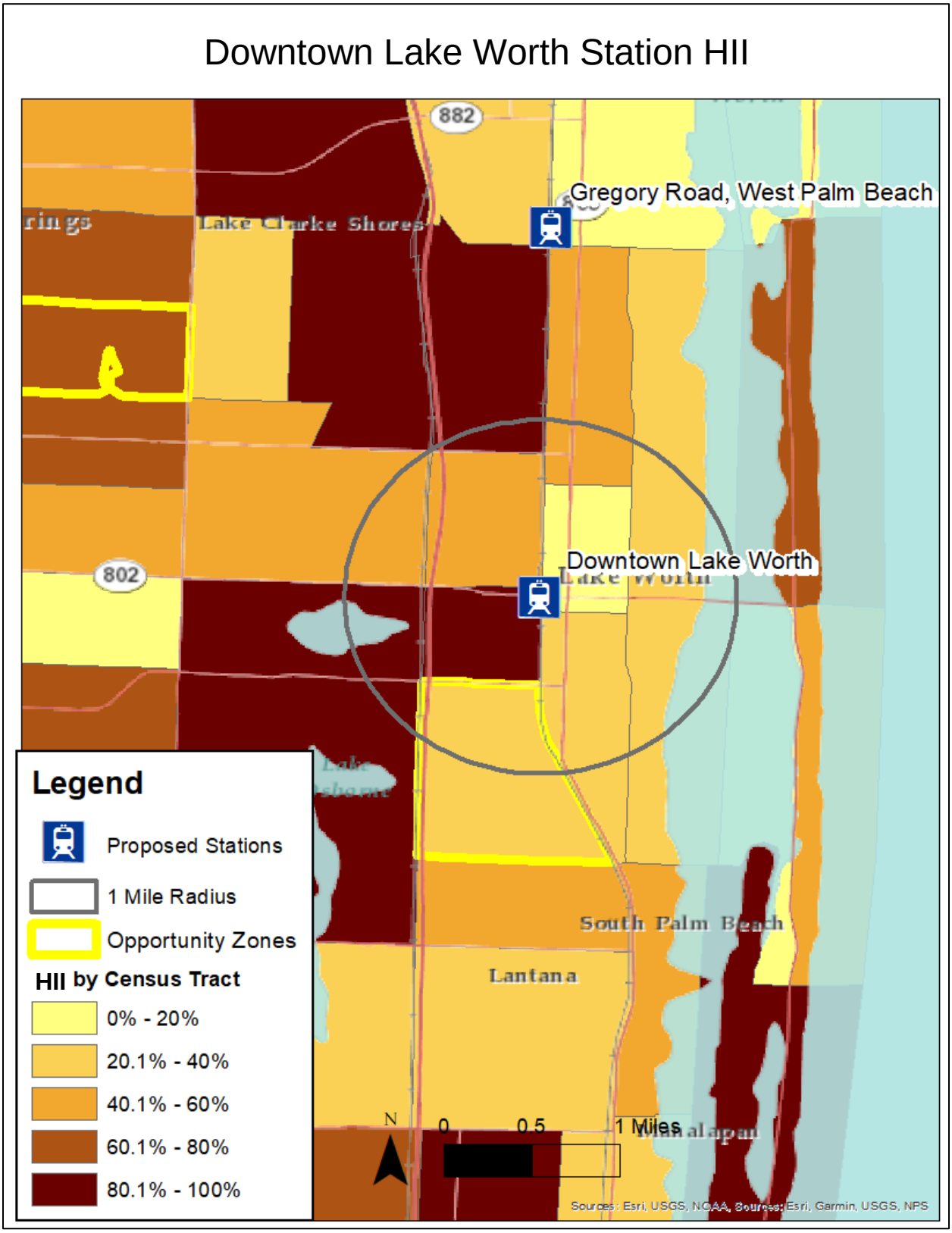


Figure 21. Downtown Lake Worth HII.

Lake Worth

The HII for the Lake Worth station is close to the median because of a balance between high growth stations to the west and lower growth stations to the east, towards the shore. The HRI for the entire station area is fairly low. This station is located in Palm Beach County.

The Lake Worth station is located in a downtown, medium density urban area near Highway 1. The small lots, mix of uses, and small block size that make up downtown Lake Worth make it ideal for TOD, but there are relatively few vacant lots near the station area.

The gap projection predicts that both the gap for both extremely low-income homeowners and renters will increase dramatically: this suggests a fairly affordable area for homeownership where gentrification is driving up housing prices and removing extremely cheap homes from the market.

There is only one Opportunity Zone in the station area, to the south of the station.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	N	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	414	1,690	4,899	-1,141	3,916	9,412
Renter	-1,685	-344	4,866	-2,020	211	7,684

	Value	**Percent Rank**
Housing Instability Index	.03	52.4%
Household Resilience Index	-.35	36.7%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, inclusionary housing policy, linkage fee, adaptive reuse, targeted code enforcement and rehabilitation program	

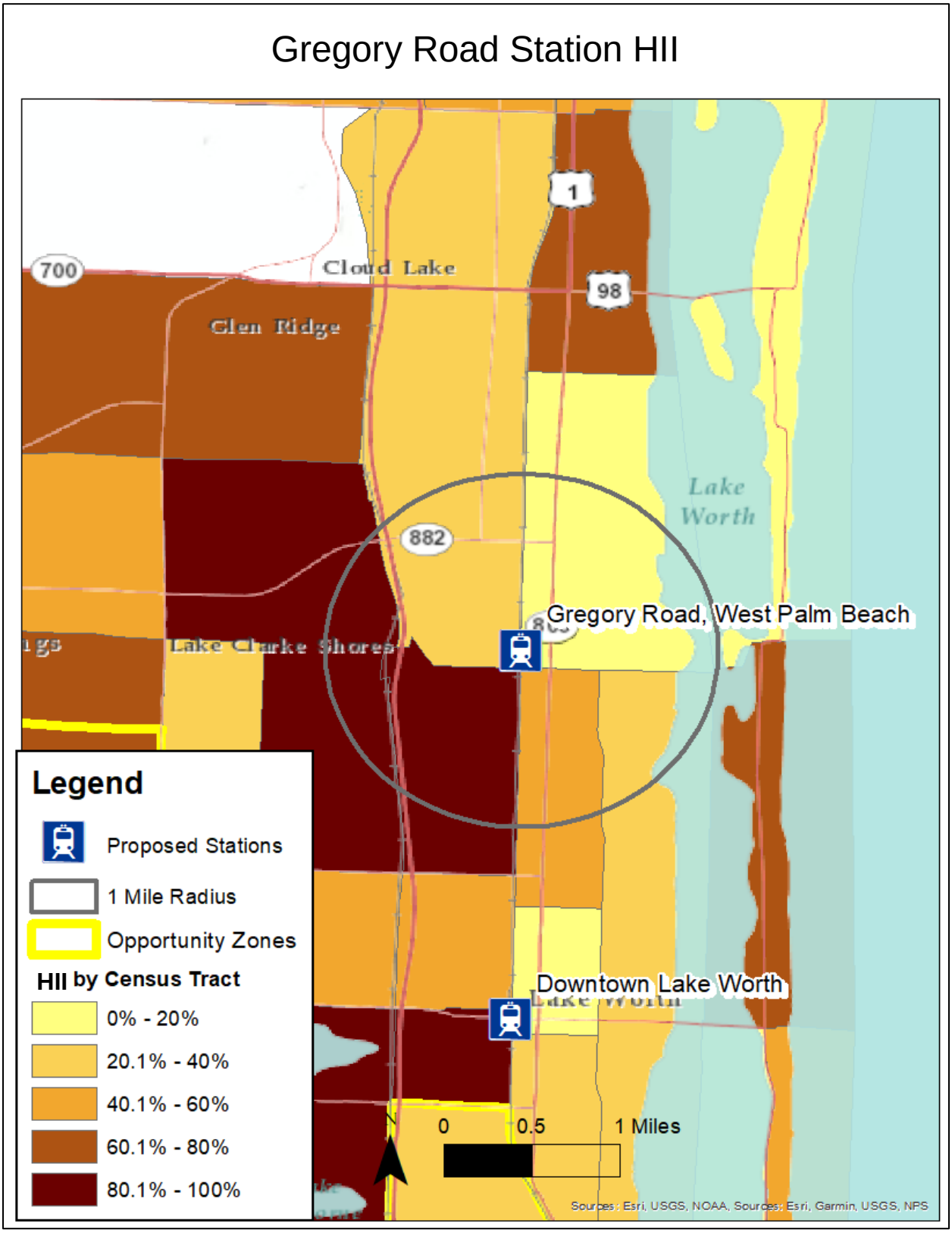


Figure 22. Gregory Road West Palm Beach HII.

Gregory Road

The Gregory Road station's HII and HRI are close to the median. The census tract to the far west of the station has both an extremely high HII and an extremely high HRI, while the census tract to the immediate south west of the station has high HII, but low HRI, possibly pointing to development spreading from the wealthier neighborhoods nearby.

The Gregory road station is located in a suburban area in south West Palm Beach.

All of the tenure and income groups in the Gregory Road station area will see a shrinking affordability gap, that is more homes at an accessible price, except for extremely low-income renter, for whom there will be dramatically fewer homes within their price range.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	N	Y	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-355	358	3,114	1,141	3,916	9,412
Renter	-533	-669	1,901	-2,020	211	7,684

	Value	**Percent Rank**
Housing Instability Index	-.06	47.3%
Household Resilience Index	.27	56.8%
Suggested Strategies	School system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, dedicated housing trust fund	

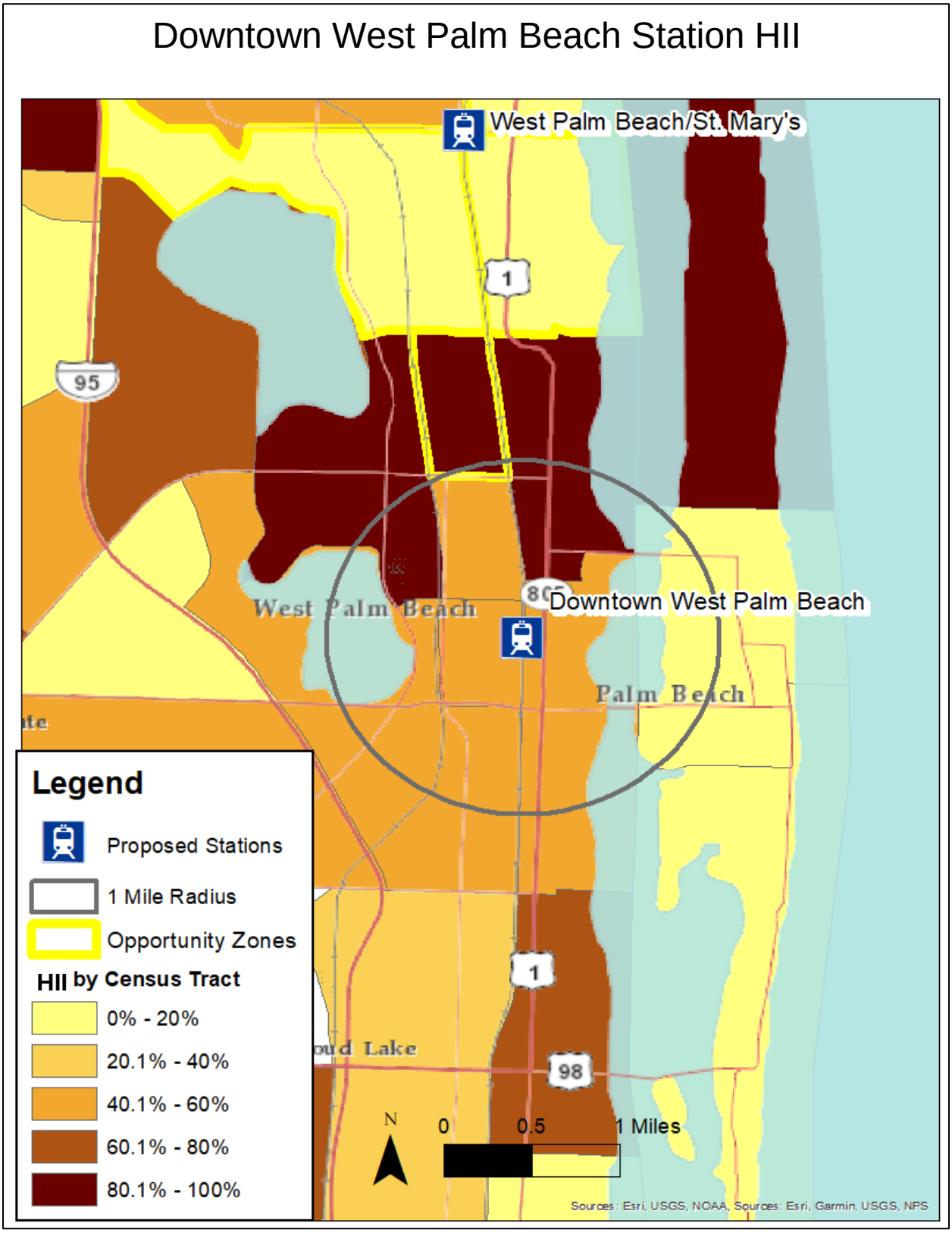


Figure 23. Downtown West Palm Beach HII.

Downtown West Palm Beach

The development near the Downtown West Palm Beach station has primarily been in census tracts to the north of the station, which have extremely low HRI: the higher HRI census tracts to the south and east (by the shore) have lower HIIs.

The Downtown West Palm Beach Station is located in a dense, urban area that is already transit focused because of the existing Bright Line Station.

In the gap analysis, every group has improved: even the housing gap for extremely low-income renters has shrunk since 2010 and should continue to shrink into 2025.

There is only one Opportunity Zone near the station, and it is located at the far north of the station with only a corner within the 1-mile radius.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	N	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-35	426	978	287	896	2,218
Renter	-1,185	163	3,150	-938	846	4,839

	Value	**Percent Rank**
Housing Instability Index	.04	56.8%
Household Resilience Index	.10	51.4%
Suggested Strategies	School system or large employers, affordable housing ombudsman, CLT, linkage fee ordinance, inclusionary housing policy, dedicated housing trust fund	

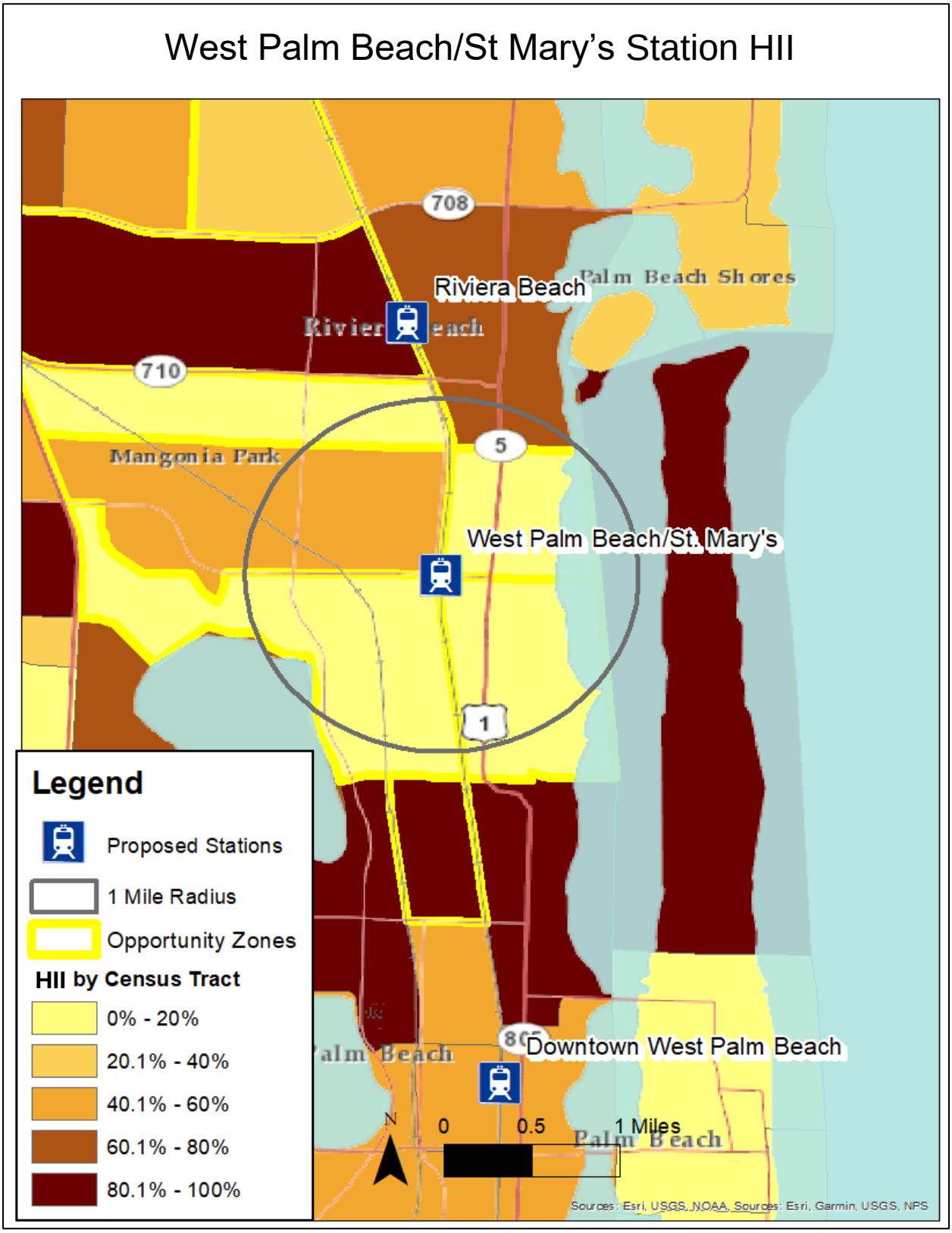


Figure 24. West Palm Beach/St. Mary's HII.

West Palm Beach, St. Mary's

The area around the St. Mary's station is the absolute poorest on the line with an HRI that is in the 26th percentile compared to the region as a whole, and the areas nearest the station have lower HRIs than the area across the intercoastal on the island. The HII in these census tracts is lower than the region as a whole, though much higher than the HRI.

The area around the station is suburban, single family and residential. The station is right across from St. Mary's Medical Center.

The gap for extremely low-income renters is projected to grow slightly, but for all other income/tenure groups the gap has narrowed or the surplus has grown.

Almost all the land within the 1-mile radius is an Opportunity Zone.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	Y	N	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	238	1,249	2,064	812	2,816	3,779
Renter	-1,097	222	2,799	-1,141	714	4,314

	Value	**Percent Rank**
Housing Instability Index	-.12	41.8%
Household Resilience Index	-.75	26.1%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, targeted code enforcement and rehabilitation program	

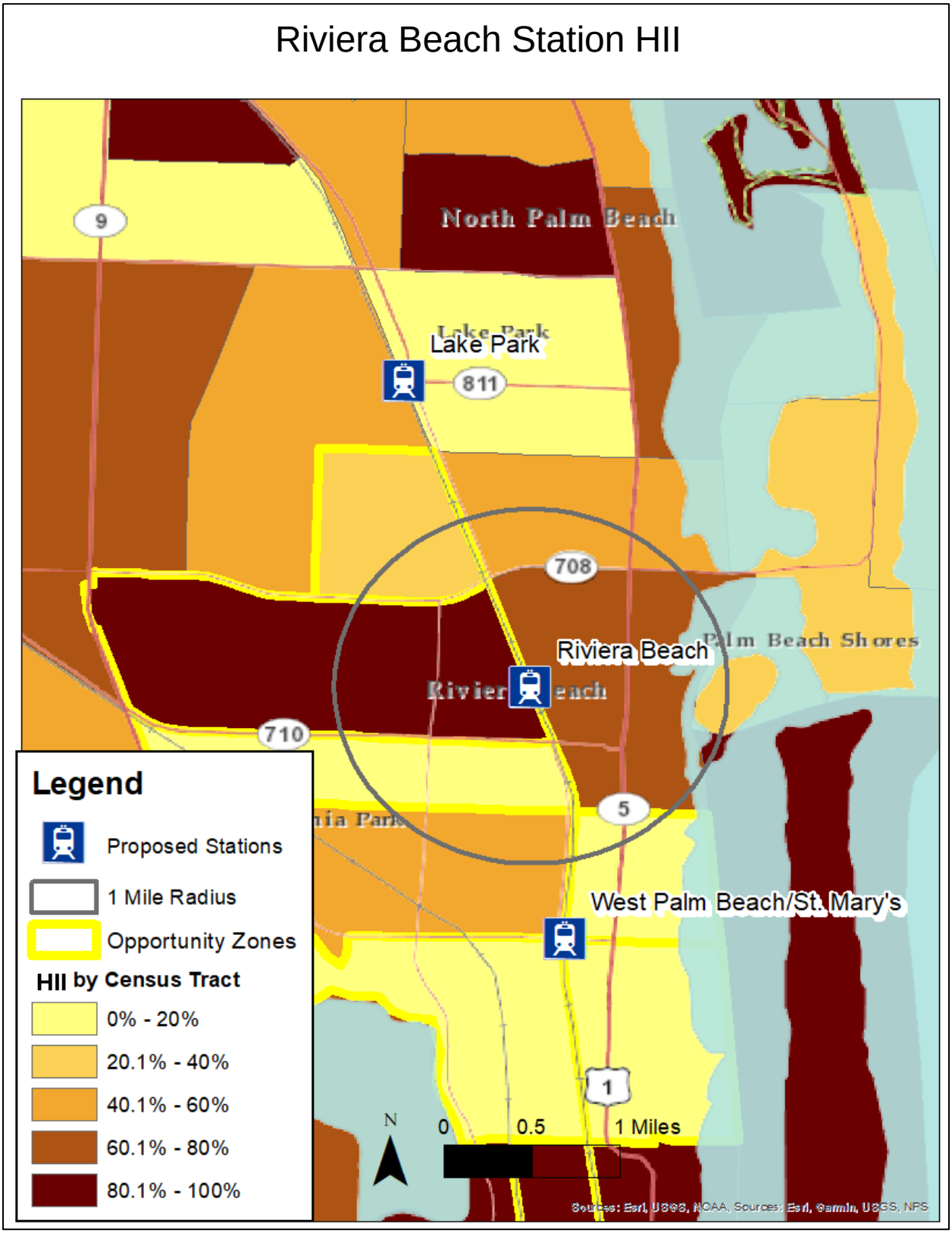


Figure 25. Riviera Beach HII.

Riviera Beach

The Riviera Beach station area shares many of its census tracts with St. Mary's to the south. Thus, Riviera Beach also has an extremely low average HRI. Riviera Beach has a mildly higher HRI, but a much higher average HII, particularly in the census tracts directly around the station.

The station is surrounded by suburban, single family and industrial development, along with some government buildings to the south east. There are few large vacant plots around the station area, though a good deal of underdeveloped and government buildings that could be converted to TOD.

Extremely low-income renters have seen a small rise in their housing gap, but all other income/tenure groups have seen a rising surplus.

As with the St. Mary's station, most of the census tracts in the area are Opportunity Zones.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	N	N	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	647	1,518	1,912	1,677	3,425	3,425
Renter	-1,136	103	2,885	-1,242	614	4,426

	Value	**Percent Rank**
Housing Instability Index	-.06	47.6%
Household Resilience Index	-.73	26.7%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, targeted code enforcement and rehabilitation program	

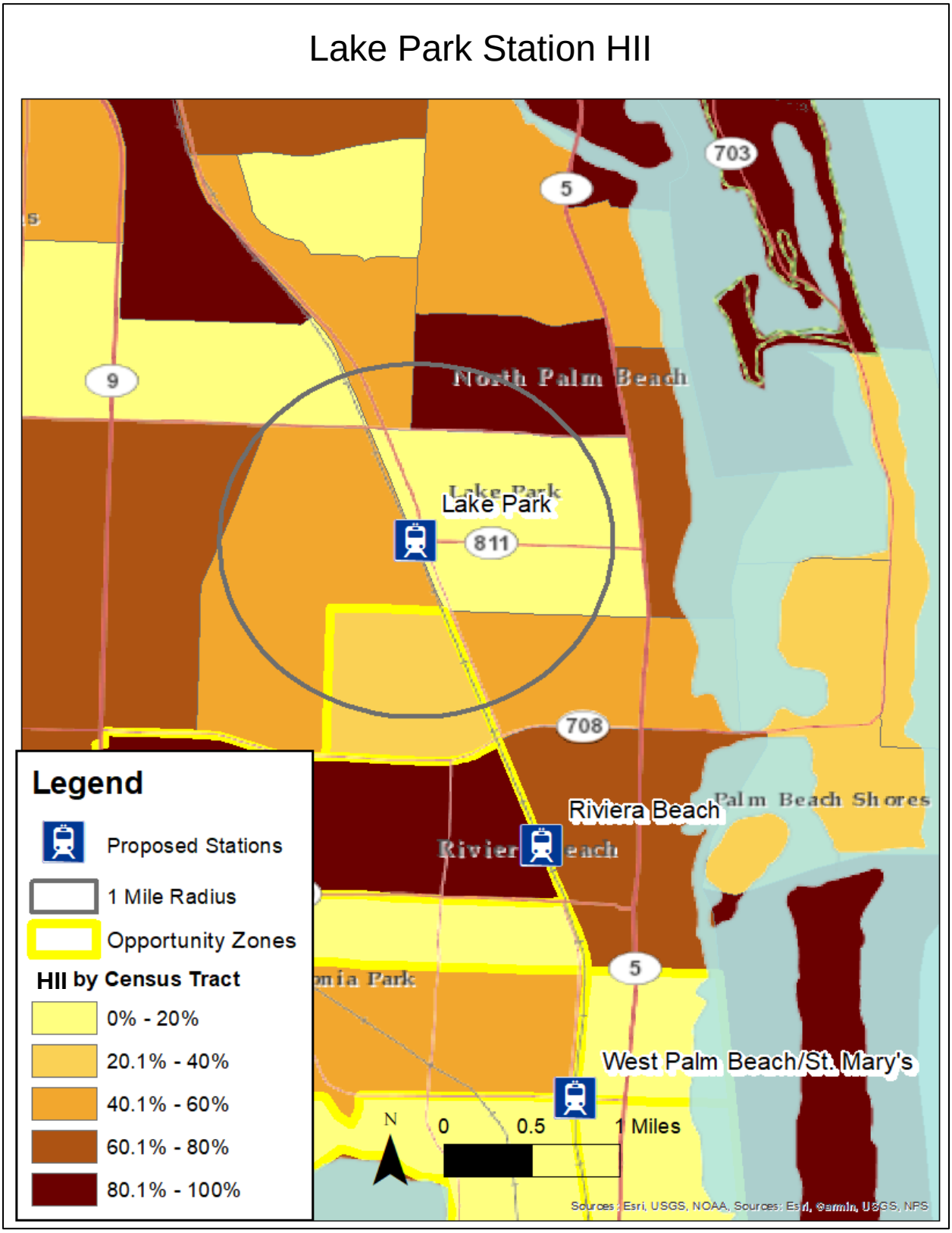


Figure 26. Lake Park HII.

Lake Park

The Lake Park station area showed both HII and HRI mildly below the area average, that is its residents are mildly more vulnerable to displacement and growth is mildly slower than the rest of the region. Unlike in many other stations, this average growth and average income is not because of census tracts canceling each other out: in Lake Park, most census tracts scored in the middle for growth in the region, besides the census tract directly to the east of the station area, which is one of the slowest growing census tracts in the three-county area.

The Lake Park Station area is located on the corner between industrial and single family, low density development. Near the station there are a few higher density apartment complexes, as well as a number of offices and businesses.

Lake Park has seen dramatic improvements in its housing gap except for the extremely low-income rental group, which has remained flat.

The southern portion of the station area is an Opportunity Zone.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	Y	N	N	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	1,027	2,229	3,751	1,959	4,825	7,572
Renter	-892	-414	2,639	-828	369	3,353

	Value	**Percent Rank**
Housing Instability Index	-.15	43.4%
Household Resilience Index	-.24	40.1%
Suggested Strategies	Opportunity Zone and Place Based Incentives, school system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, robust surplus lands policy, employer assisted housing program, adaptive reuse, targeted code enforcement and rehabilitation program	

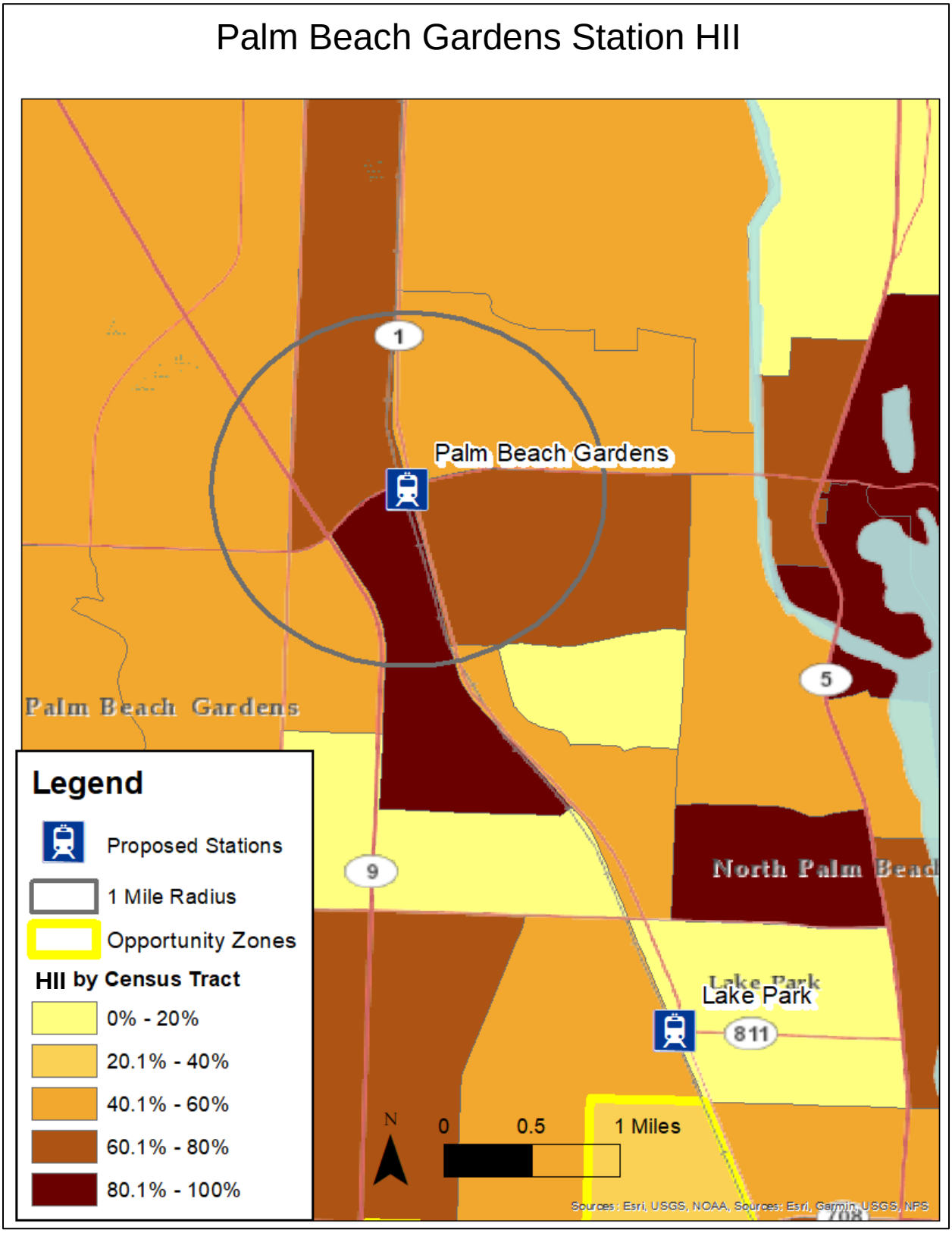


Figure 27. Palm Beach Gardens HII.

Palm Beach Gardens

The Palm Beach Gardens station area has one of the highest HRIs of anywhere along the station: nearly every census tract within the station area is in the highest quintiles. Palm Beach Garden has also seen higher growth than most of the stations, particularly in the census tract that extends from just below the station down out of the station area.

The Palm Beach Garden station is located on the corner of Highway 811 and PGA Boulevard. Nearby is a grocery store, a mall, and a number of low-density, single family developments.

There is very little growth projected in the Gap Analysis between 2017 and 2025 in almost all income/tenure categories except for moderate income homeowners, who have dramatically more homes available.

The Palm Beach Station has no Opportunity Zones.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
N	N	N	N	N	N

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-296	431	3,113	-263	1,367	6,032
Renter	-519	-711	774	-596	-635	323

	Value	**Percent Rank**
Housing Instability Index	.03	58.2%
Household Resilience Index	.60	74.5%
Suggested Strategies	School system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, dedicated housing trust fund, inclusionary housing policy, linkage fee ordinance, robust surplus land policy	

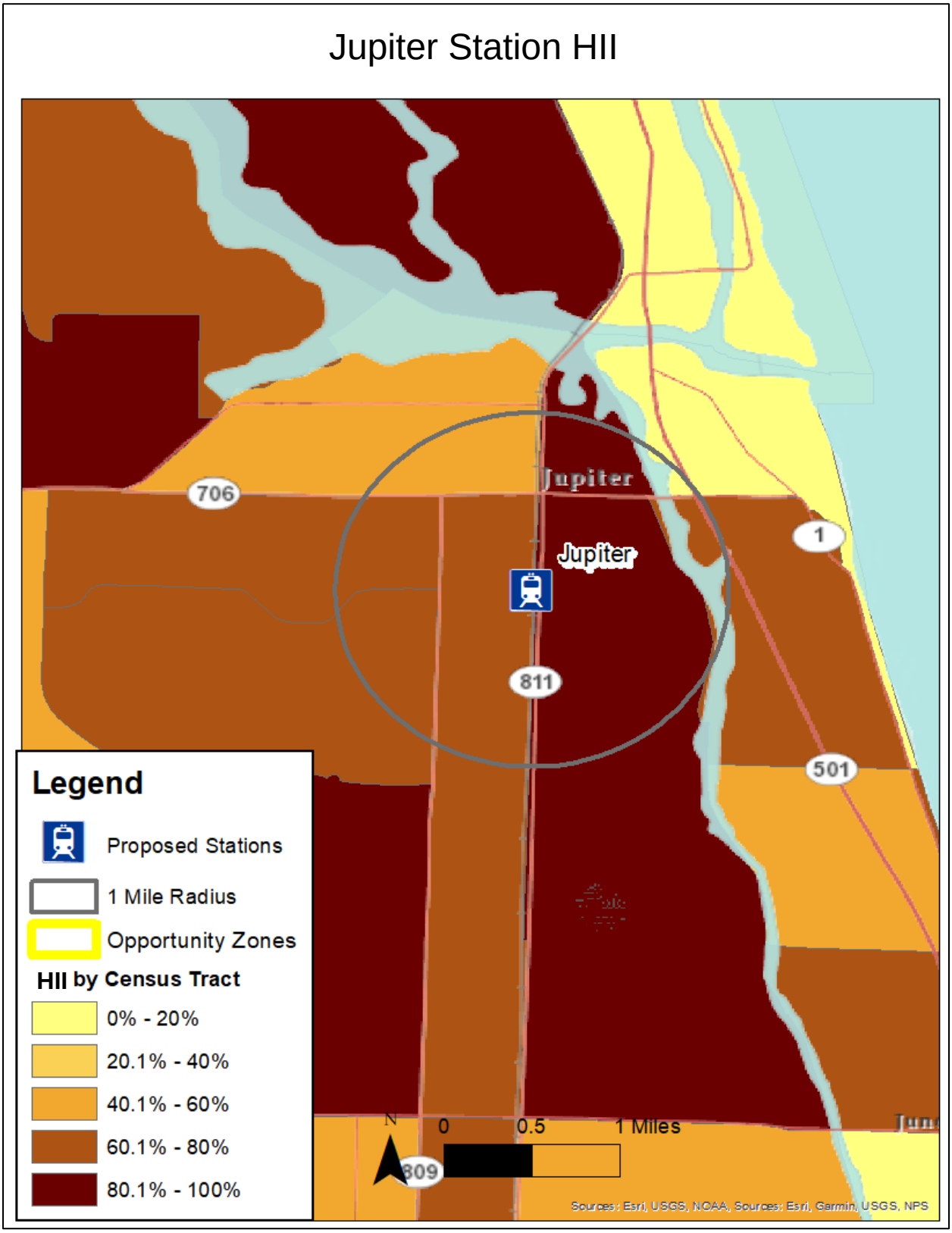


Figure 28. Jupiter HII.

Jupiter

Jupiter has seen high growth (HII) and has one of the least vulnerable populations (HRI). The area to the east of the station, towards the intercostal, has both the highest HII and HRI.

The Jupiter station is located in between a mixture of high density residential, single family residential, commercial, industrial, and a golf club. The station itself has convenient access to 811, though there is little room around the station to construct a park and ride or TOD.

There has been an increase in the number of homes affordable to low- and moderate-income homeowner and renter households, and a small decline in the number of homes available for households under 30% AMI. However, all changes are small, and the forecast is for a similar small change by 2025.

There are no Opportunity Zones near the Jupiter Station.

Program Eligibility					
LMISD?	**CRA (TIF)?**	**OZ?**	**B'field?**	**DDA?**	**Opp. Area?**
Y	Y (Y)	N	N	Y	Y

Gap Analysis	**2017**			**2025**		
	0-30% AMI	30.1 – 60%	60.1 – 120%	0-30%	30.1 – 60%	60.1 – 120%
Owner	-589	242	2,281	-771	1,510	4,643
Renter	-321	-200	871	-374	69	1,171

	Value	**Percent Rank**
Housing Instability Index	.22	60.8%
Household Resilience Index	.64	75.0%
Suggested Strategies	School system or large employers, affordable housing ombudsman, CLT, zoning flexibility, ADU policies, dedicated housing trust fund, inclusionary housing policy, linkage fee ordinance, robust surplus land policy	

Application of Strategies in Two Stations

Station 1: Downtown Boynton Beach

Zoning

The Downtown Boynton Beach station area is zoned like many traditional suburban communities in Florida. The table below shows the zoning classification for parcels in the 1-mile radius around the proposed station. Local land use regulations require large lot sizes, set high minimum living area standards, and require on-site parking. Using tax assessor parcel data, one immediately sees a significant concentration of single-family parcels (1551 parcels), covering approximately 670 acres. There are approximately 200 multi-family parcels in the station area, covering approximately 26 acres of land. There is very little industrial activity in the station area, with only 69 parcels categorized as industrial, covering only 26.2 acres.

Zoning Category	Zoning Code	Parcels	Acres
Commercial	C3	74	43.6
	C2	66	19.4
	C4	50	17.9
	CBD	76	59.7
Light Industrial	M1	69	26.2
Multi-Family Residential	R3	214	46.6
Single Family Residential	RSF	299	155.4
	R1	54	27.5
	R-1-A	1551	302
	R-1-AA	201	40.3
	R2 (duplex)	723	121.7
	RSE	30	22.5
Vacant	Residential	314	83.2
	Commercial	72	29.1
	Industrial	3	8.9

Table 3. Zoning in Downtown Boynton Beach Station Area, Tax Assessor's Office, accessed February, 2019.

This land use mix of single family detached houses and a small inventory of multi-family apartment buildings creates a challenging housing environment for any low-income household seeking affordable housing in Boynton Beach. The need

for supportive rental and affordability policies are emphasized by Downtown Boynton Beach's rapid increases in rent (across all census tracts in the station area, median gross rent increased by 20% on average between 2010 and 2017) and increase in cost burden (increasing 18% between 2010 and 2017). At the same time, the area experienced 7% population growth, applying increased pressure to housing demand. Housing pressures are not focused exclusively on homeowners - a meaningful share of occupied housing units in Boynton Beach are occupied by a renter household: approximately 57.4% of occupied housing units across all census tracts in the station area are owner-occupied while 42.6% are renter-occupied. Thus, policies which promote access to rental units, particularly more affordable rental units, are needed to meet existing demand in Boynton Beach.

Given the concentration of single-family and duplex homes, composed primarily of R-1-A, R-1-AA, and R2 categories, the table below shows allowable density and land use regulations for those three zones, according to the Boynton Beach, FL Code of Ordinances.

Code	**Minimum Lot Area**	**Maximum Structure Height**	**Minimum Living Area**	**Maximum Lot Coverage**
R-1-A	7,500 square feet	30 feet	1,400 sf	45%
R-1-AA	8,000 sf	30 feet	1,600 sf	45%
R2 (duplex)	4,500 sf	25 feet	750	40%

Table 4. Residential Building and Site Regulations, Boynton Beach Code of Ordinances, Part III, Chapter 3. Zoning, Article III. Zoning Districts and Overlay Zones, Section 2. Residential Districts.

Boynton Beach's land use regulations are very effective at enforcing a low-density built environment, with few opportunities to increase density allowed by right. If Boynton Beach were interested in expanding available units affordable to lower-income households, it might consider relaxing some of the standards outlined in the table above to encourage greater density, smaller lot sizes, and multi-story buildings. For instance, permitting smaller lots would allow subdivision and increased density of livable units without sacrificing the traditional suburban character of the community. Many communities in Florida, for instance, have minimum lot areas half the required floor seen in Boynton Beach for its R-1-A zone. If pursuing this strategy, Boynton Beach should simultaneously revise its minimum living area so that a smaller unit can be built on a smaller lot.

Finally, Boynton Beach might consider making revisions to its zoning in a highly concentrated area near the proposed station, such that higher density multi-family apartments can be constructed within a ½ mile distance of the station. This increased density would support ridership, create a denser and more urban environment, and generate foot traffic for local businesses located near the station.

Spatially, Figure 29 shows parcel location by zoning category. Unsurprisingly, a majority of the area's single family detached housing is located to the West, away from the water and separate from the principal commercial corridor along Route 1. The map also shows vacant parcels of land, inclusive of commercial, industrial and residential zoned parcels.

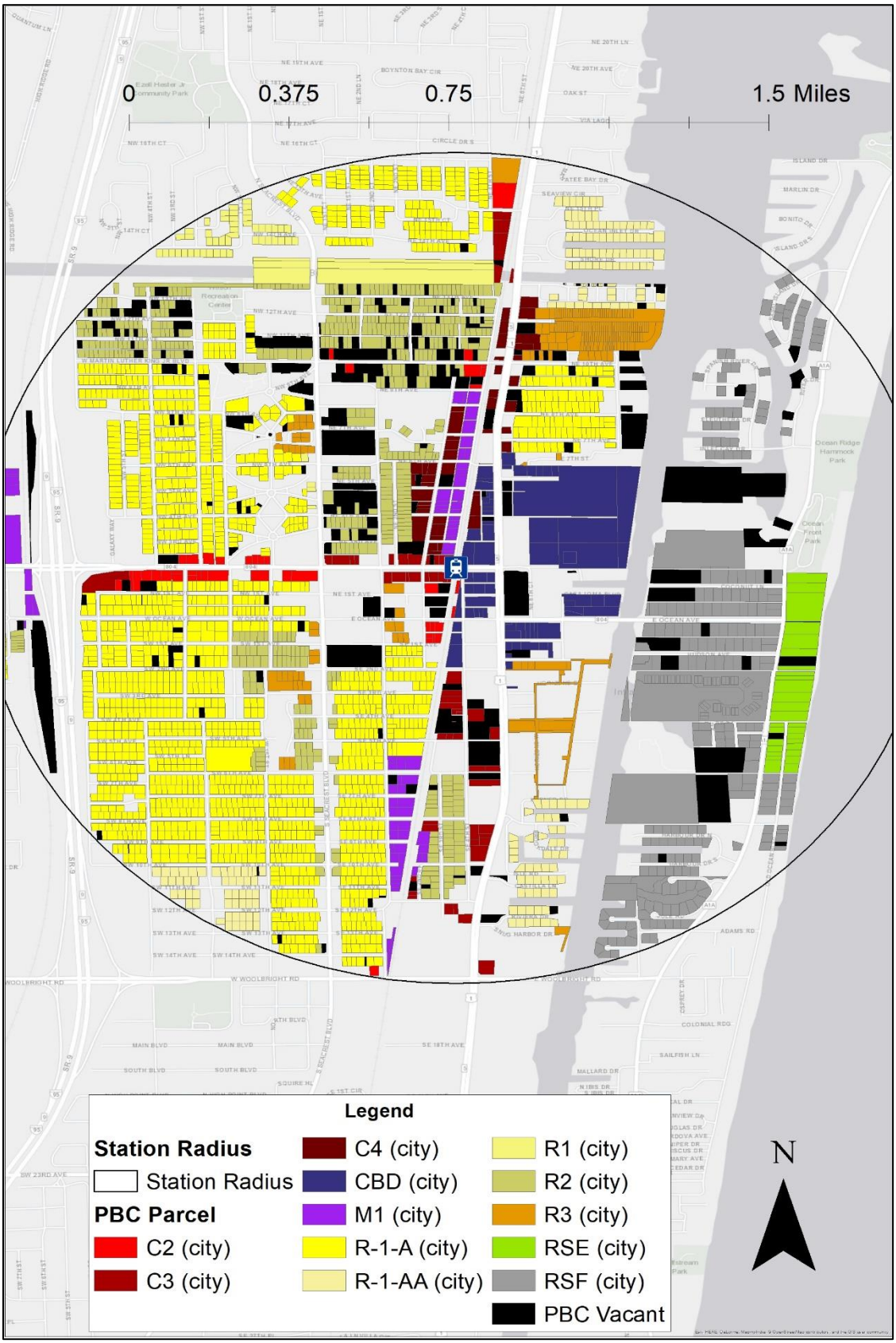


Figure 29. Zoning, Downtown Boynton Beach Station Area

Accessory Dwelling Units

Given the fact that Boynton Beach has dedicated so much of its land and resources to single family detached homes on large plots of land, promoting access to accessory dwelling units (ADU) is a viable option for expanding the supply of affordable rental units without fundamentally altering the existing built environment. Boynton Beach currently prohibits ADUs in its residential districts but permits them in non-residential parcels. The Boynton Beach code of ordinances states, "An accessory dwelling unit is allowed as an accessory use to any lawful non-residential principal use within a non-residential building. Such unit shall have a minimum living area of seven hundred fifty (750) square feet and limited to occupancy by the property owner or business owner/operator" (Boynton Beach Code of Ordinances, Part III, Chapter 3, Article IV, 36. Accessory Dwelling Unit). The City's decision to permit ADUs in non-residential parcels while not permitting them in residential areas is unusual, and is a missed opportunity to grow its housing supply, promote homeowner rights, and tackle its growing rental crisis.

Boynton Beach could promote development of ADUs by permitting by-right development of ADUs in all residential zones, including its R-1-A, R-1-AA, R1, and R2 land. The City should determine the optimal minimum living area for ADUs, but city's in Florida have realized great success setting minimums at 400 square feet and below. Even at this size, a homeowner could develop a safe structure, with full plumbing and cooking facilities, and fit it into a typical plat in the City.

At the same time, Boynton Beach should revise its parking requirements to permit development of ADUs without requiring an additional dedicated parking space for the unit. This would encourage greater adoption of ADUs. Additionally, Boynton Beach should waive impact fees for ADU development, or impose a "de minimis" impact fee of $100 for each unit.

Finally, as a recipient of State Housing Initiatives Partnership (SHIP) funds, Boynton Beach could support private development of ADUs by offering SHIP funding to income-eligible homeowners. The funding could be provided as a small grant (anywhere between $2,000 and $10,000) for substantial rehabilitation or new construction of an ADU. It should be noted that Boynton Beach would need to revise its existing Local Housing Assistance Plan (LHAP) to include a rental rehabilitation or rental construction strategy and include 15 years of annual monitoring of ADU-assisted units to meet requirements established by the Florida Housing Finance Corporation (FHFC). Boynton Beach's current LHAP does not include a rental rehabilitation or rental construction strategy.

Code enforcement and Rehabilitation

This analysis explores the share of non-homestead properties in Boynton Beach, and discusses ways the city might utilize its code enforcement powers to ensure non-homestead properties are properly maintained and support affordable housing in the future.

Much of Florida's housing stock is utilized through secondary home purchases. These non-principal residences are easily identified courtesy of a "homestead" tax exemption for principal residences. Presumably, those homes not classified as a homestead property are not lived in year-round, or are rented through a lease. In some communities in Florida, more than half of single-family homes are non-homestead properties, effectively eliminating most properties that are eligible for purchase for year-round families. When buyers purchase a second home and use it either as a vacation home, as in the home is occupied less than 50% of the year, or the home is rented in the private market, that home is effectively unavailable for purchase by income-eligible homebuyers.

Table 5 below shows a total of 2,134 total single family home residential parcels in the station area, 36.7% of them are classified as non-homestead properties, e.g. the owner does not use the home as a principal residence. The table also shows the total sales price of all transactions recorded in 2016 through 2018 by homestead and non-homestead properties. Interestingly, there was a surge of non-homestead purchases in 2018, totaling over $147 million. Further investigation revealed large bundled purchases of homes in the station area, including over $6 million in purchases from Cerberus Holdings alone. In total, Cerberus purchased 7 properties in the station area between 2016 and 2018, including

nearly $800,000 in purchases in 2018. These properties are currently rented in the private market, with listings discovered on Zillow and RentCafe, two popular real estate listing platforms.

	Parcels	**Total Sale Value, 2016**	**Total Sale Value, 2017**	**Total Sale Value, 2018**
Homestead	1,350 (63.3%)	$39,596,191 (56.0%)	$29,946,304 (51.2%)	$16,989,558 (10.3%)
Non-Homestead	784 (36.7%)	$31,060,558 (44.0%)	$28,526,866 (48.8%)	$147,577,158 (89.7%)
Total	**2,134**	**$70,656,749**	**$58,473,170**	**$164,566,716**

Table 5. Homestead and Non-Homestead single family residential parcels and total sales price by year, Downtown Boynton Beach Station Area, Tax Assessor's Office, accessed February, 2019.

Figure 30 shows the spatial distribution of homestead and non-homestead single family parcels in the station area. The map shows relatively even distribution of non-homestead properties across the area. Of the parcels closest to the proposed station site, there is an even distribution of homestead and non-homestead parcels. There appears to be some concentration of non-homestead parcels on the coast in the towns of Ocean Ridge and Briny Breezes.

It is evident that a significant share of Boynton Beach's housing stock is composed of single-family homes, of which nearly 40% are non-homestead properties. While private property owners are certainly at liberty to purchase homes as they desire, this situation does present particular challenges from an affordability perspective. In Boynton Beach's case, it is particularly troubling that national private equity firms are purchasing properties and subsequently renting the properties at the highest value the market can bear. It is beyond the scope of this report to determine the housing quality and maintenance record of non-homestead properties. In some cases, non-homestead properties owned by absentee landlords can pose a health and safety risk to neighboring homes, particularly in the event of an economic downturn when national property owners are forced to cut maintenance and property management costs.

In order to address affordability concerns, it is recommended that the City of Boynton Beach actively pursue code violations related to property maintenance. In the event that citations are issued and unpaid, the city should actively apply a lien to properties in violation of the city's code of ordinances. In particular, enforcement of the City's property maintenance code, as seen in Code of Ordinances, Part II, Chapter 10, Article IV. Section 10-56 would leverage City control over absentee landlords and may encourage sale of the home to eligible private homebuyers. Active enforcement measures could be targeted in a limited geography around the station area to ensure those properties closest to the station remain in good condition and do not present a risk to the neighborhood.

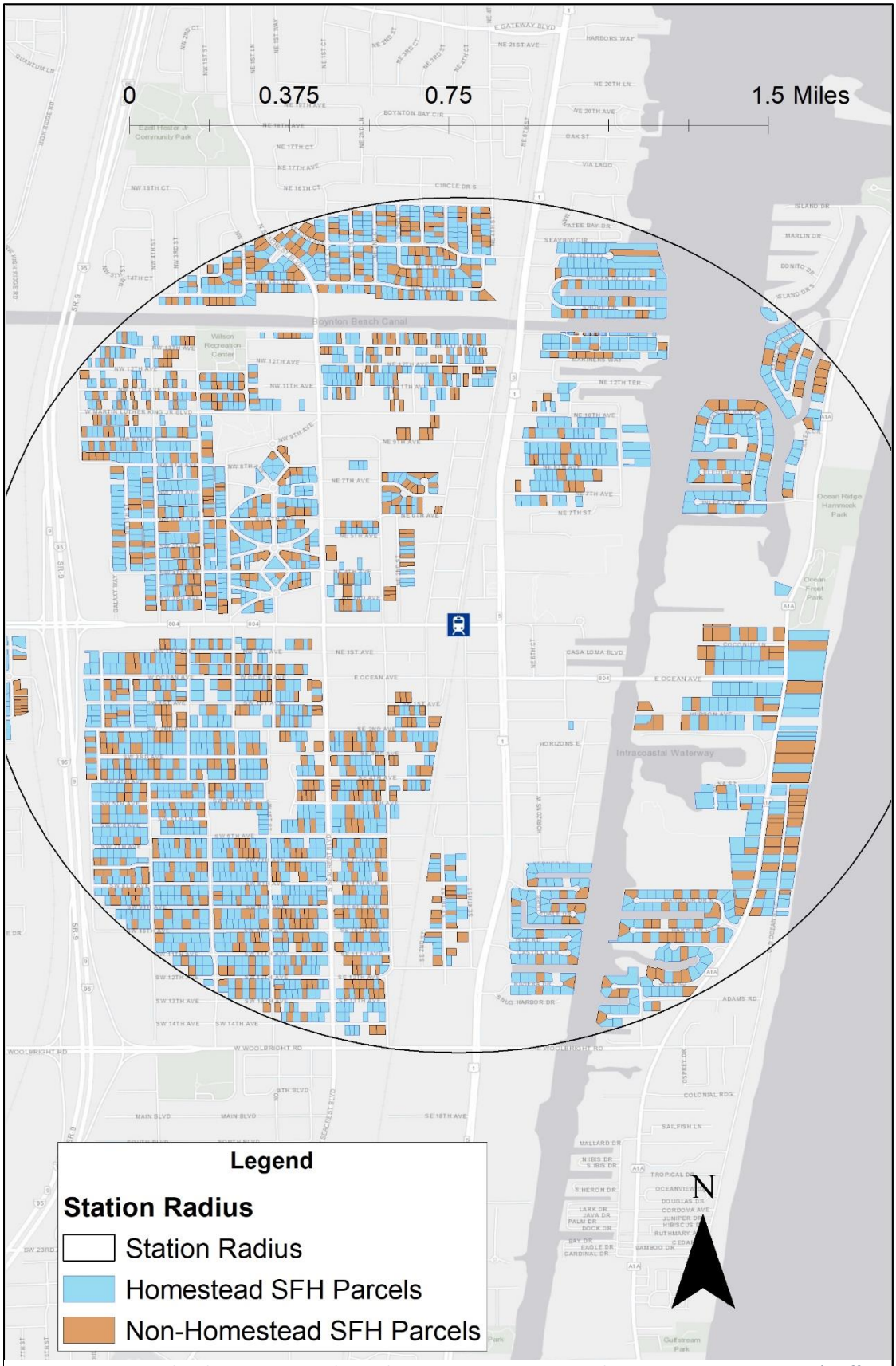


Figure 30. Homestead and non-Homestead Parcels, Downtown Boynton Beach Station Area, Tax Assessor's Office, Accessed February, 2019.

Opportunity Zones and Place-Based Incentives

There is a single designated Opportunity Zone census tract in the City of Boynton Beach. It covers the northern half of the station radius, and includes commercial, industrial, and primarily residential properties. Further analysis identified 248 parcels identified as vacant according to tax assessor data. As detailed in Table 6 below, a majority of these vacant parcels are residential, with a handful of commercial properties, a single recreational site, and one industrial.

Zoning Category	Zoning Code	Vacant Parcels
Commercial	C2	17
	C3	1
	C4	6
	CBD	5
Industrial	M1	1
Mixed Use	MU-H	2
	MU-L	1
Residential	R-1-A	24
	R-1-AA	12
	R2	168
	R3	10
Recreation	REC	1
Total		248

Table 6. Zoning of identified vacant parcels in City of Boynton Beach designated Opportunity Zone census tract, Tax Assessor data, accessed February, 2019.

Availability of vacant parcels matters, particularly in the Opportunity Zone context, because the Opportunity Zone incentive has a "substantial improvement" requirement for investment by a qualified opportunity fund (QOF) into property in an opportunity zone. The requirement mandates that investors effectively double the basis of any property owned by the QOF within 30 months acquiring the property. In a subsequent round of regulations, the IRS clarified that the investment basis shall exclude the value of land and only consider the value of the improvements on the land (e.g. the building). Thus, acquiring vacant parcels in an Opportunity Zone is likely to be a strong investment decision as an investor has significantly greater leeway in the degree to which it must invest in the land to meet the substantial improvement requirement. This makes vacant parcels in the City of Boynton Beach an attractive investment prospect for private equity interested in developing new affordable housing projects in the station area.

There is a second tactic worth considering in the Boynton Beach station area: creating a public-private partnership to invest in infrastructure for the TRCL station area itself. While this strategy would certainly require an intensive research, design, and legal structuring process before implementation, it could be a unique approach to capitalizing the TRCL's infrastructure needs. This strategy might form a Qualified Opportunity Business with responsibility for financing and construction of the TRCL station itself. The Business would operate the facility, and ultimately sell the property to a bond-

financed public entity who would hold the property in perpetuity. The investor would realize capital gain savings through the Opportunity Zone incentive, especially if held for 10 years, and the public would benefit from access to a new commuter rail station.

In addition to the Opportunity Zone incentive, the Downtown Boynton Beach station area also has extensive Brownfield program designated areas within its radius. The Brownfield program offers a series of incentives for development, including set aside benefits for development of affordable housing. If an affordable housing site is planned to be located in a Brownfield, it is eligible to receive the following incentives for remediation and redevelopment:

1. Sales Tax Refund for Building Materials
    a. Sales tax refund is available for building materials purchased and used in the construction of a "housing project" or a "mixed-use project" located in a Brownfield area.
        i. "Housing project" is defined as the conversion of an existing manufacturing or industrial building where the developer agrees to set aside at least 20 percent of the housing units for low-income and moderate-income persons or the construction of affordable housing.
        ii. For a "Mixed-use project," at least 20 percent of the square footage must be for low-income and moderate-income housing
2. Voluntary Cleanup Tax Credit
    a. Tax credit on eligible costs for environmental cleanup work is eligible for sites in a Brownfield area and governed by a Brownfield cleanup agreement
        i. 50% state tax credit provided, up to a maximum annual $500,000 per site
    b. Bonus for affordable housing sites
        i. Additional tax credit bonus for 25% of the environmental costs incurred and paid over project's lifetime, up to a maximum $500,000 award
        ii. Project must qualify as affordable housing under Florida law
3. Other State incentives
    a. Job Bonus Tax Refund
        i. Business may be eligible for up to $2,500 in tax refunds for each new job created
    b. State Loan Guarantee
4. Local Incentives
    a. Local governments are authorized under Fla. Stat. § 376.84 to add an additional layer of incentives. These include:
        i. Tax increment financing
        ii. Tax exemption for historic properties
        iii. Electric and gas tax exemption; CDBG grants
        iv. Waiver of fees; low-interest resolving loans
        v. See § 376.84 for the full list
5. Federal Incentives
    a. Brownfield projects can receive federal grants from EPA
    b. Types of grants:
        i. Assessment; Cleanup; Area-Wide Planning; Revolving Loan Fund; Technical Assistance, Training, and Research

Figure 31 below shows place-based incentives available in Boynton Beach, and the location of vacant parcels in the city's designated Opportunity Zone census tract.

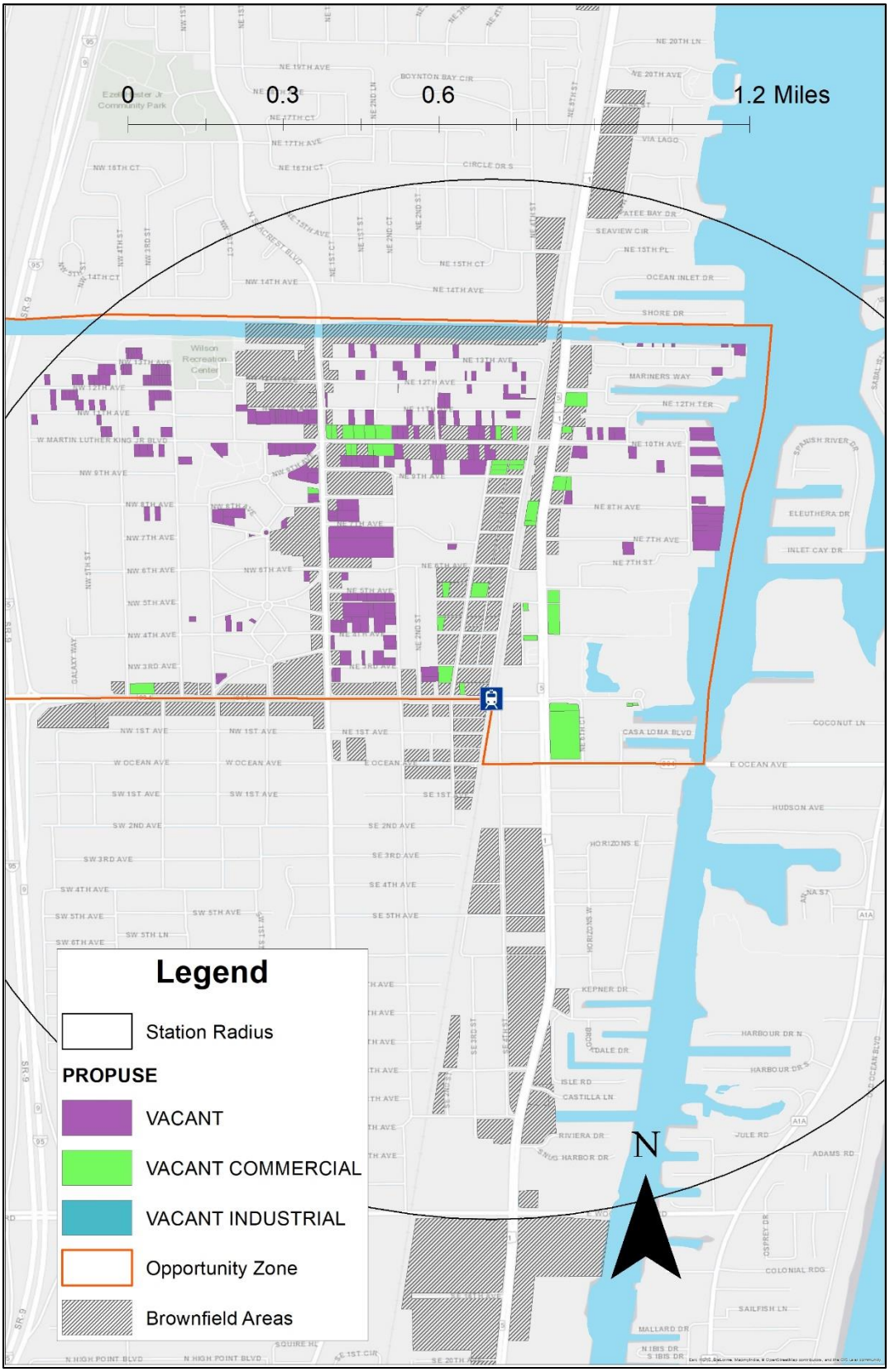


Figure 31. Vacant parcels in designated Opportunity Zone census tract, Downtown Boynton Beach station area, Tax Assessor data, Accessed February, 2019.

Community Land Trusts

From the analysis discussed above, Boynton Beach has a high concentration of single-family homes, many of which are too expensive for lower-income homebuyers. At the same time, the city has experienced dramatic increases in home values. As prices and interest rates rise, it becomes increasingly difficult for a lower-income homeowner to purchase an affordable home. A robust program for offering city-owned surplus lands to a CLT for rehabilitation or even new construction would build a stock of permanently affordable, well-managed properties across the City.

Station Two: 36th Street Station

The 36th Street Station has experienced some of the region's worst cost inflation over the last 7 years (between 2010 and 2017), and the population living in the area is highly vulnerable to displacement (as measured by the HRI). For this reason, this report examines the 36th Street Station area in detail and offers some suggestions for ways to ensure access to affordable housing in the area.

Just north of downtown Miami, the 36th Street Station's 1-mile radius includes the Wynwood neighborhood, a rapidly gentrifying artist community to the south and southeast of the proposed station. Two census tracts in particular have experienced the greatest cost pressure since 2010: census tract 12086002201 to the north of the station, and tract 12086002702 to the south. The northern tract is composed primarily of traditionally workforce single family homes in a suburban built environment. The proximity of this tract to popular destinations in downtown Miami and Wynwood just to the south may explain the rapid increase in home values and rent prices. The southern tract (12086002702) covers a significant portion of the Wynwood neighborhood, and is composed primarily of high-density mixed-use properties, including along a major corridor (Biscayne Blvd).

The following sections detail policy changes or strategies that could preserve and create affordable housing in the 36th street station area.

Inclusionary Zoning

In December, 2018, the City of Miami Commission passed a mandatory inclusionary zoning ordinance for the Omni CRA district. Setting a mandatory inclusionary zoning ordinance demonstrates how important Miami's commissioners view the affordable housing crisis. The Omni CRA district does not cover any of the 1-mile station radius for the 36th Street Station.

While the City of Miami Commission recognized the value of inclusionary zoning policy for its Omni CRA district, it did not extend the requirement to areas outside the Omni CRA. Given the intense development of multi-family apartments in the Wynwood community, and the evident displacement of existing residents, we recommend that the City Commission create a similar inclusionary zoning ordinance for the Midtown CRA which covers a large portion of the station area. The same requirements as set in the Omni inclusionary ordinance could be used in the Midtown area.

Zoning

The City of Miami uses a form-based code for its zoning. An extensive review of allowances, incentives, flexibilities, and density requirements revealed the City is doing a superior job in easing traditional barriers to development of affordable housing. The list of incentives already present in the City of Miami's code for affordable housing is extensive:

- Reduced parking requirements.
- Increased height allowances.
- Increased density for inclusion of units affordable to extremely low-income renters.
- Flexibility in lot area requirements.
- Setback requirements above the eighth floor can be modified.

These incentives are a good start to making development and inclusion of affordable housing in mixed-income properties more feasible from a financial perspective.

The incentives listed above apply only to high density multi-family apartments. Looking at the built environment in the 36th street station area illuminates the need for a focus on higher densities in the traditional suburban single-family home neighborhoods stretching to the west and northwest of the proposed station (see Figure 32 for a visual reference).

The table below shows permitted uses in the city's T3 zoned communities. These communities can be considered traditional suburban communities with typically single family detached homes.

	T3-L	T3-O
Estimated number of parcels in station area	1278	335
Density (units per acre)	9	18
Single family	Yes	Yes
Community residence	Yes	Yes
Ancillary Unit (ADU)	Yes	
Two-Family Residence (duplex)		Yes

Table 7. Permitted uses, Article 4, Table 3, Miami 21 Code of Ordinances

The T3-O zone is of particular interest for the purposes of this report. The T3-O area permits duplexes by-right, and doubles the unit density per acre from 9 to 18. As shown in Figure 32, the acreage and number of parcels in T3-O zones are limited. We recommend that T3-L areas closest to the proposed station area be rezoned to T3-O to allow higher densities and development of duplexes by right.

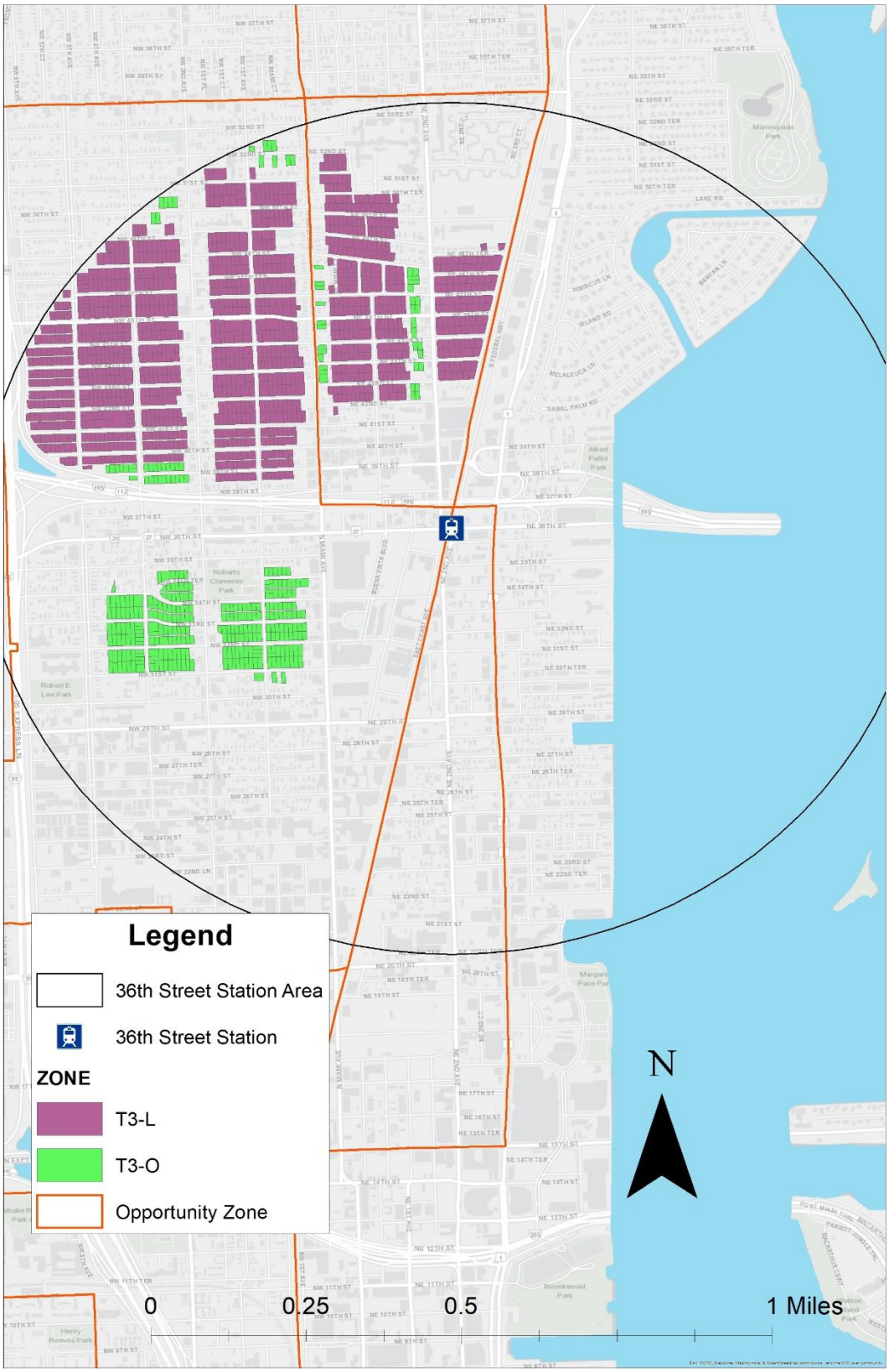


Figure 32. Single family parcels and traditional suburban zones, tax assessor data accessed February, 2019 and Miami 21 Code of Ordinances.

Employer Assisted Housing

The 36th Street Station area is blessed with multiple large employers and institutions located nearby, including the University of Miami and the Miami International University of Art & Design. This presents an excellent opportunity to engage with administrators of those universities to explore the possibility of supporting an employer assisted housing program (EAHP).

The University of Miami offers limited housing support for staff and faculty of the university. UM owns a large plot of land, the Smathers Four Fillies Farm, which is a community of 30 single-family homes in the Village of Pinecrest. The University also offers limited financing options for purchase of homes on the Farm. In previous years, the University offered a shared appreciation mortgage (SAM) pilot program, in which tenured faculty could access inexpensive debt for purchase of a principal residence anywhere in Miami-Dade County.

We recommend UM and other universities consider an EAHP for all staff, including those earning below the area median income. For the 36th street station area, we recommend home purchase incentives, including offering down payment and closing cost assistance, for staff purchasing a principal residence in a T3 zone.

Opportunity Zones and Place-Based Incentives

The 36th Street Station area is ripe with opportunity for layering place-based incentives for development of affordable housing. The Midtown CRA covers a significant portion of the area, nearly the entire station community is a designated Brownfield area, and there are two designated Opportunity Zone census tracts.

Of particular interest for the purposes of this study are vacant parcels within opportunity zones and brownfield areas. Figure 33 below shows vacant parcels (according to tax assessor data accessed in February, 2019) in designated Opportunity Zone census tracts. Many of these parcels represent a prime value proposition for an Opportunity Zone investor. In particular, parcels in the southern portion of the station area have high land values that are not calculated in the OZ program's substantial improvement requirement, with very intense by-right density. Given their vacant status, it is assumed most of these sites do not have improvements on them.

Figure 33 shows a histogram of the 176 vacant parcels identified as such by tax assessor's data. The data shows distribution of vacant parcels by the value of land and the assessed value of the property. There appear to be some relatively affordable vacant parcels within the station area.

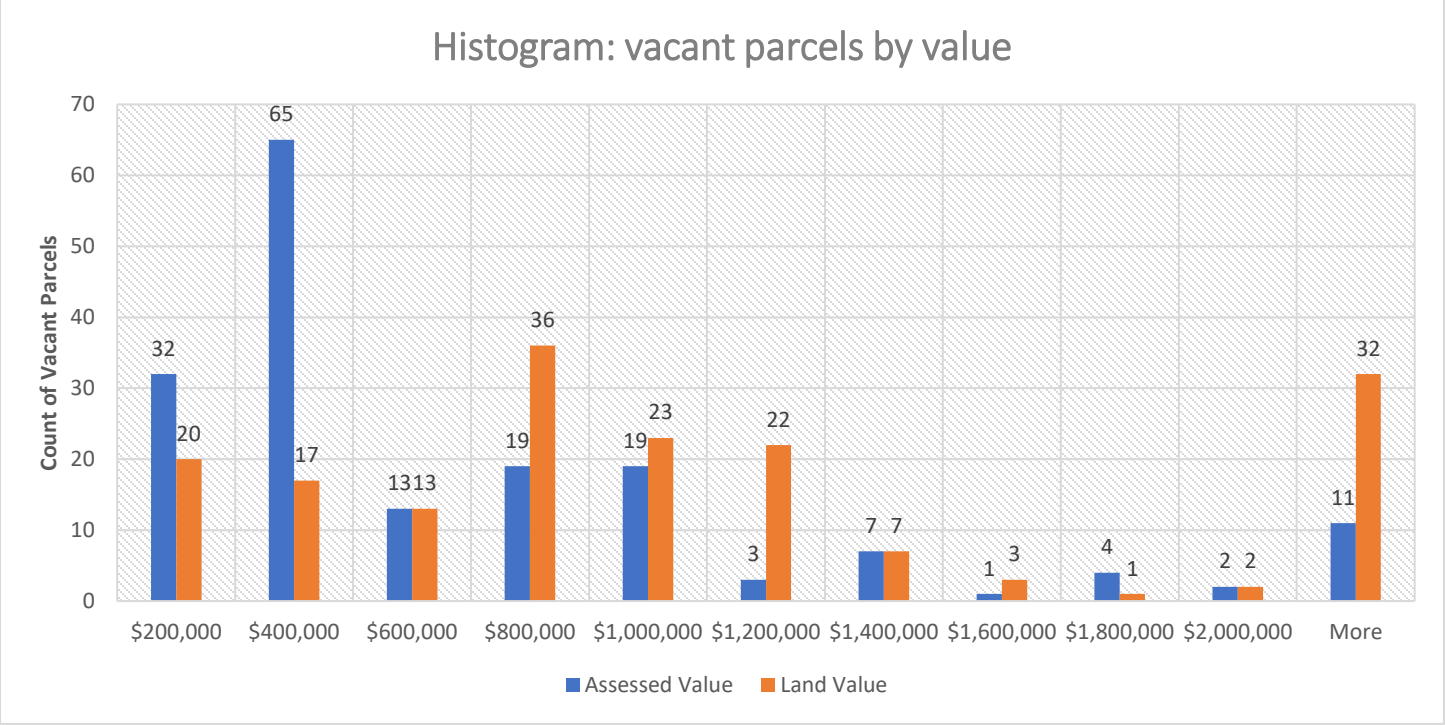


Figure 33. count of vacant parcels by assessed value and land value, tax assessor's office, data accessed February 2019.

Understanding the real estate market in Miami, it is unlikely that many of these properties are available for sale to a nonprofit or other affordable housing developer. However, we recommend that social-minded investment firms interested in an Opportunity Zone investment look carefully at the 36th street station area and its Opportunity Zone on the south side of the station.

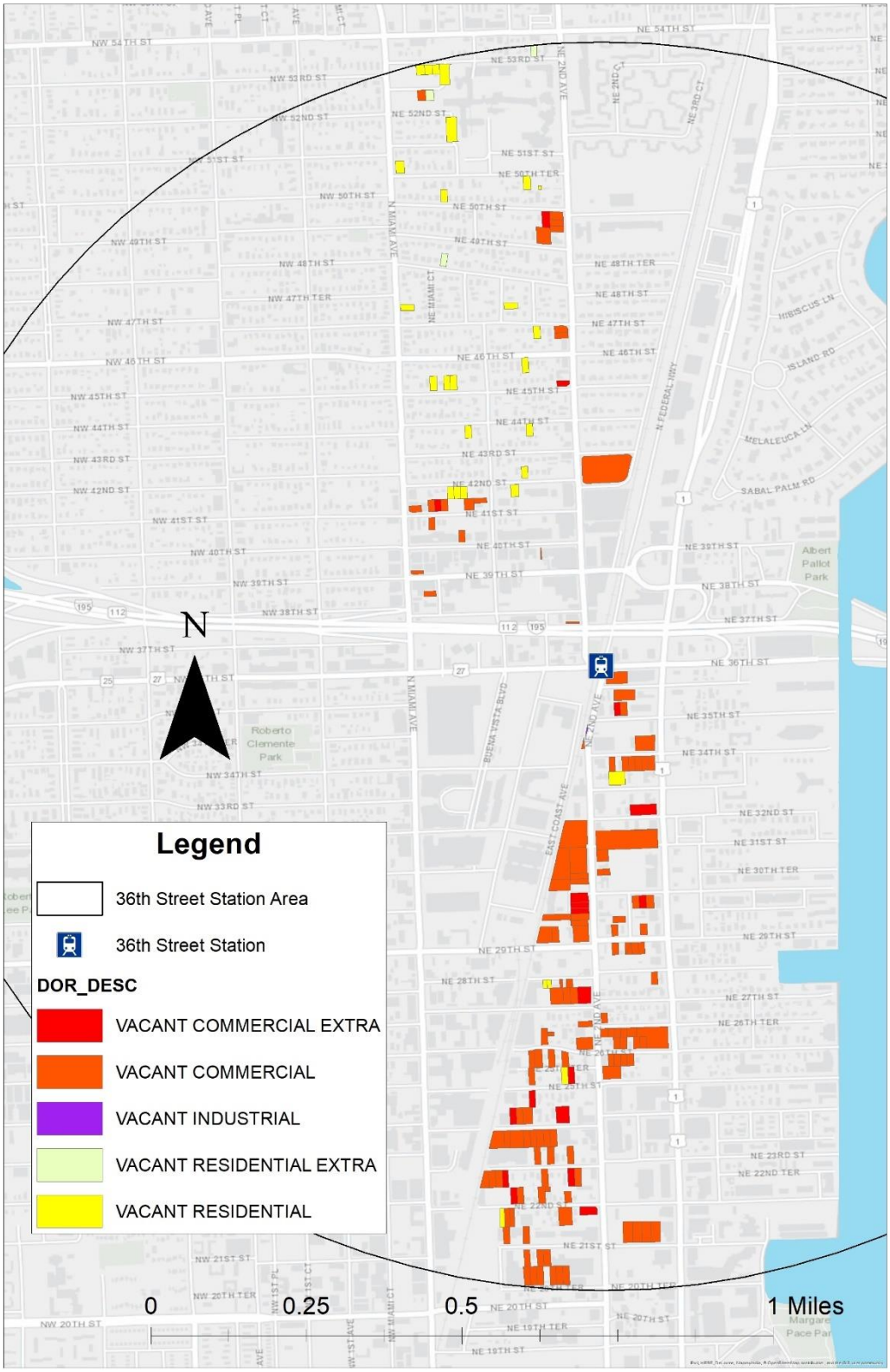
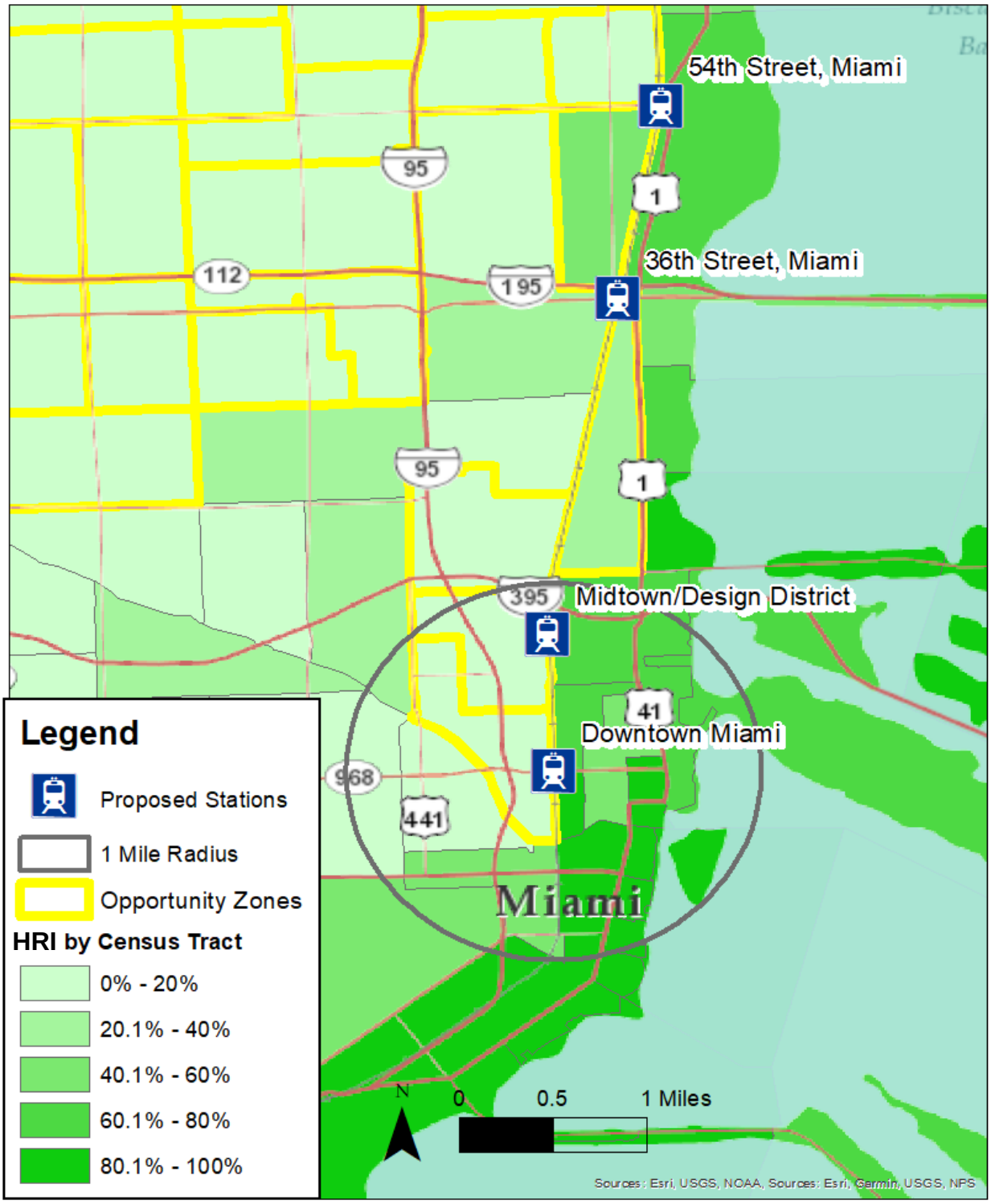
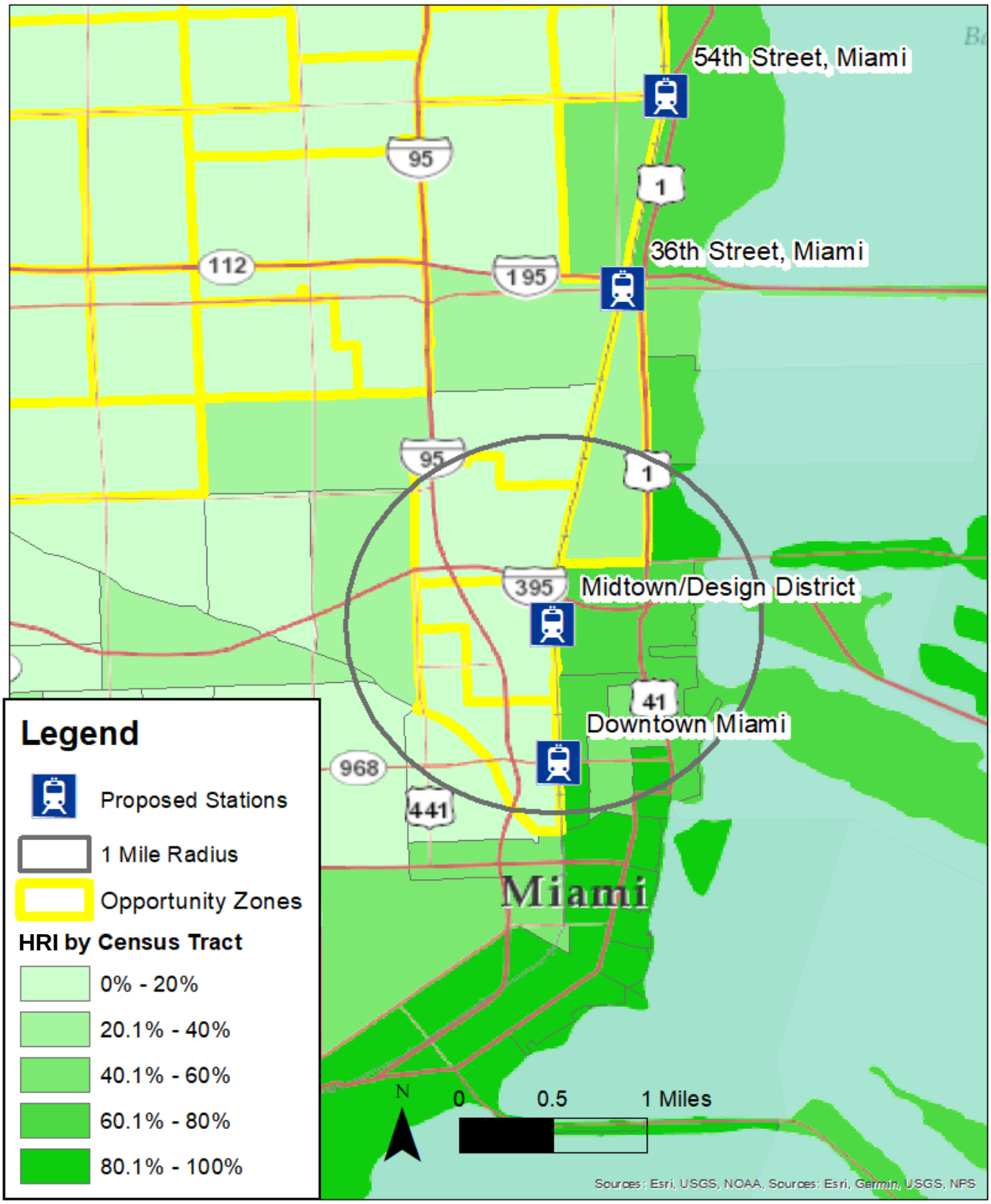


Figure 34. Vacant parcels in designated Opportunity Zone census tracts, tax assessor data accessed February, 2019.

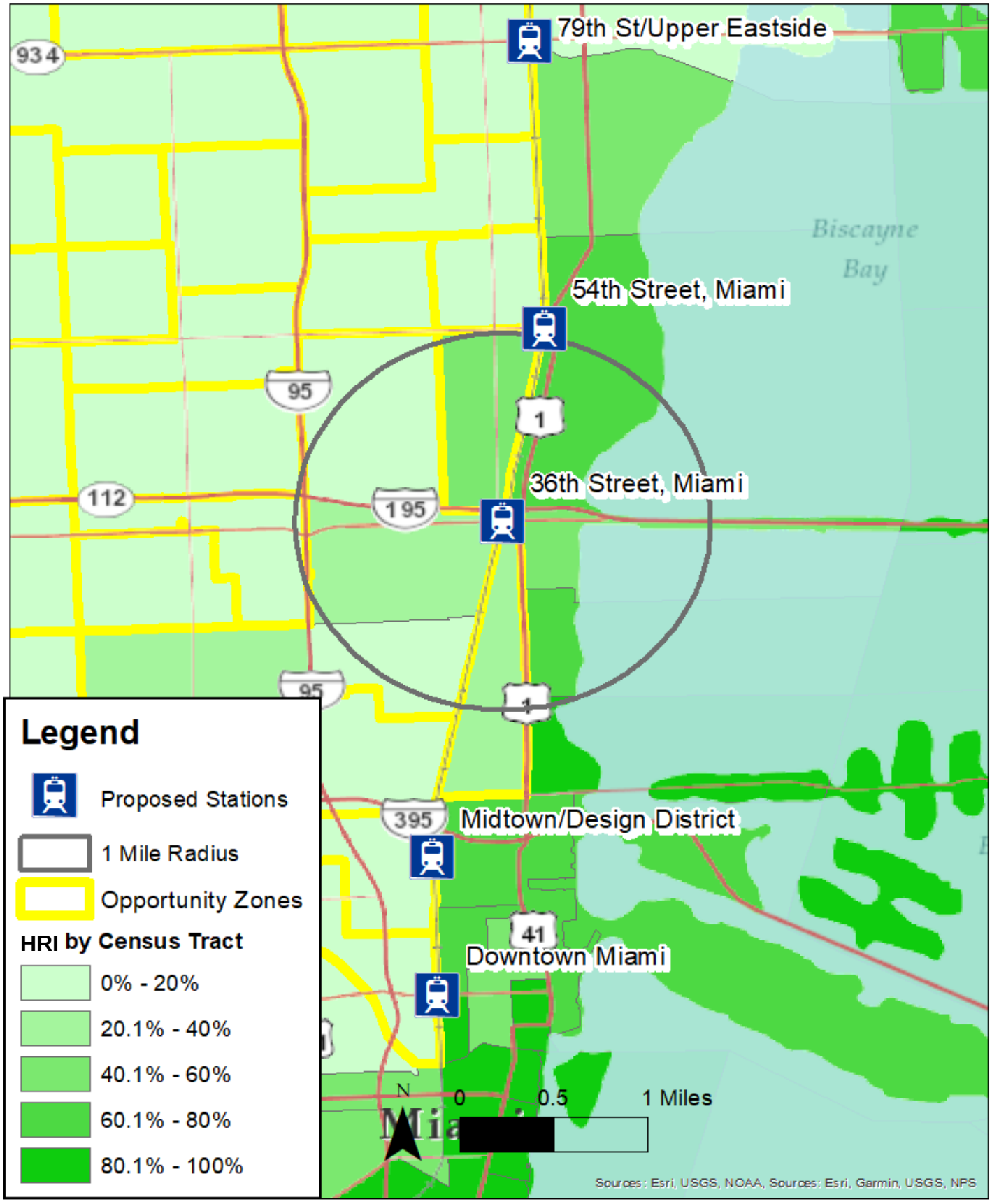
Government Center Downtown Miami Station HRI



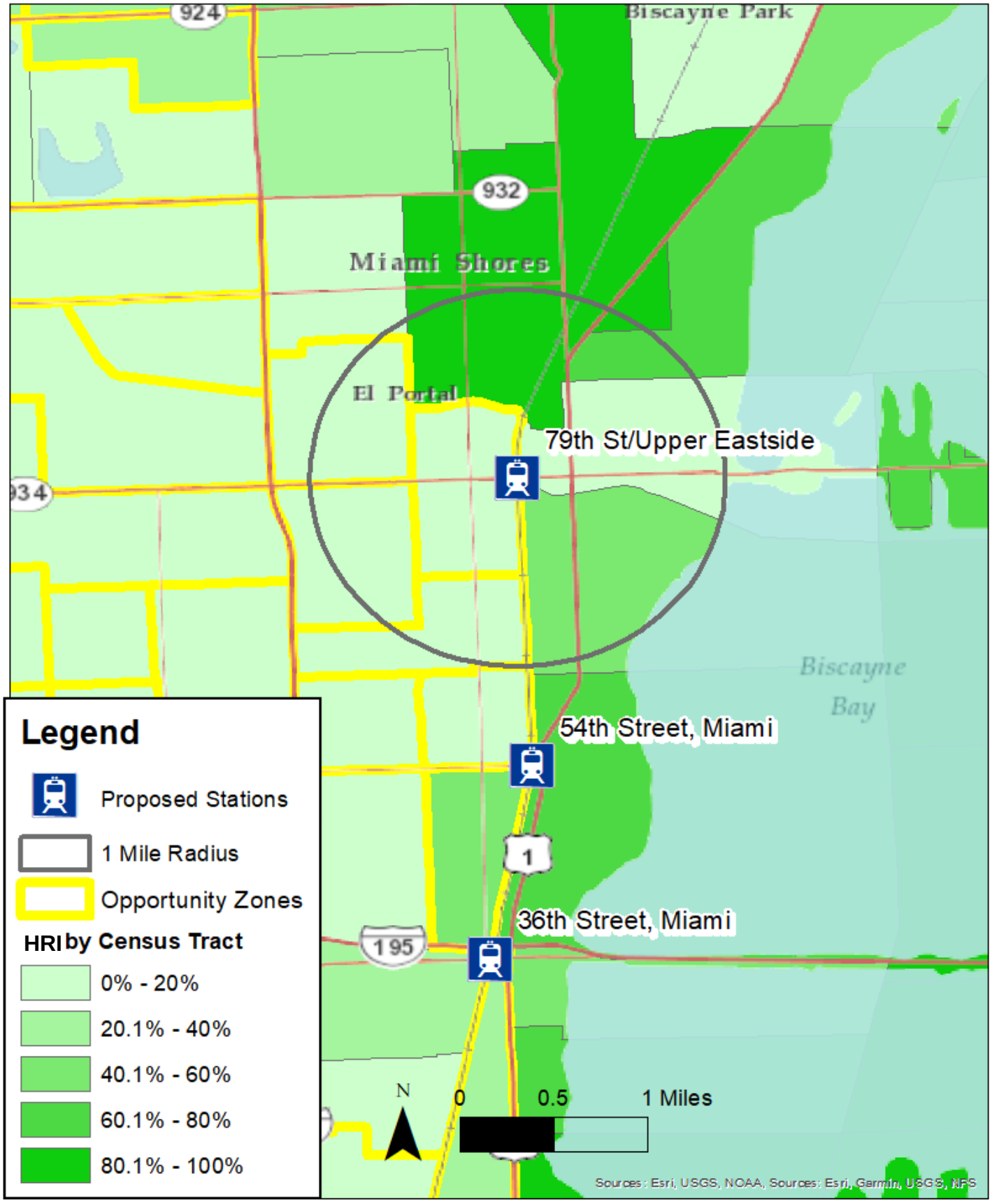
Midtown Design District Station HRI



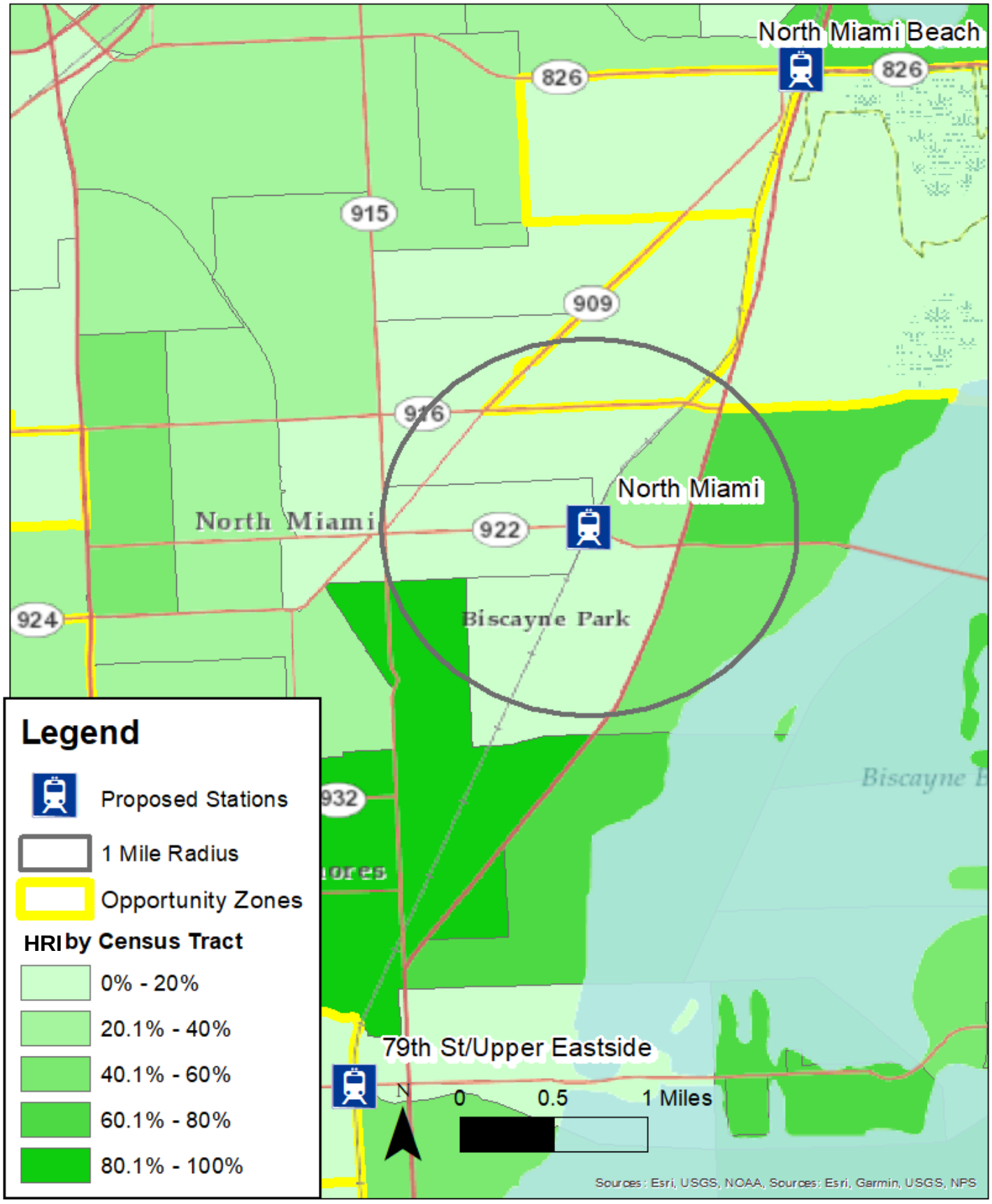
54th Street Station HRI



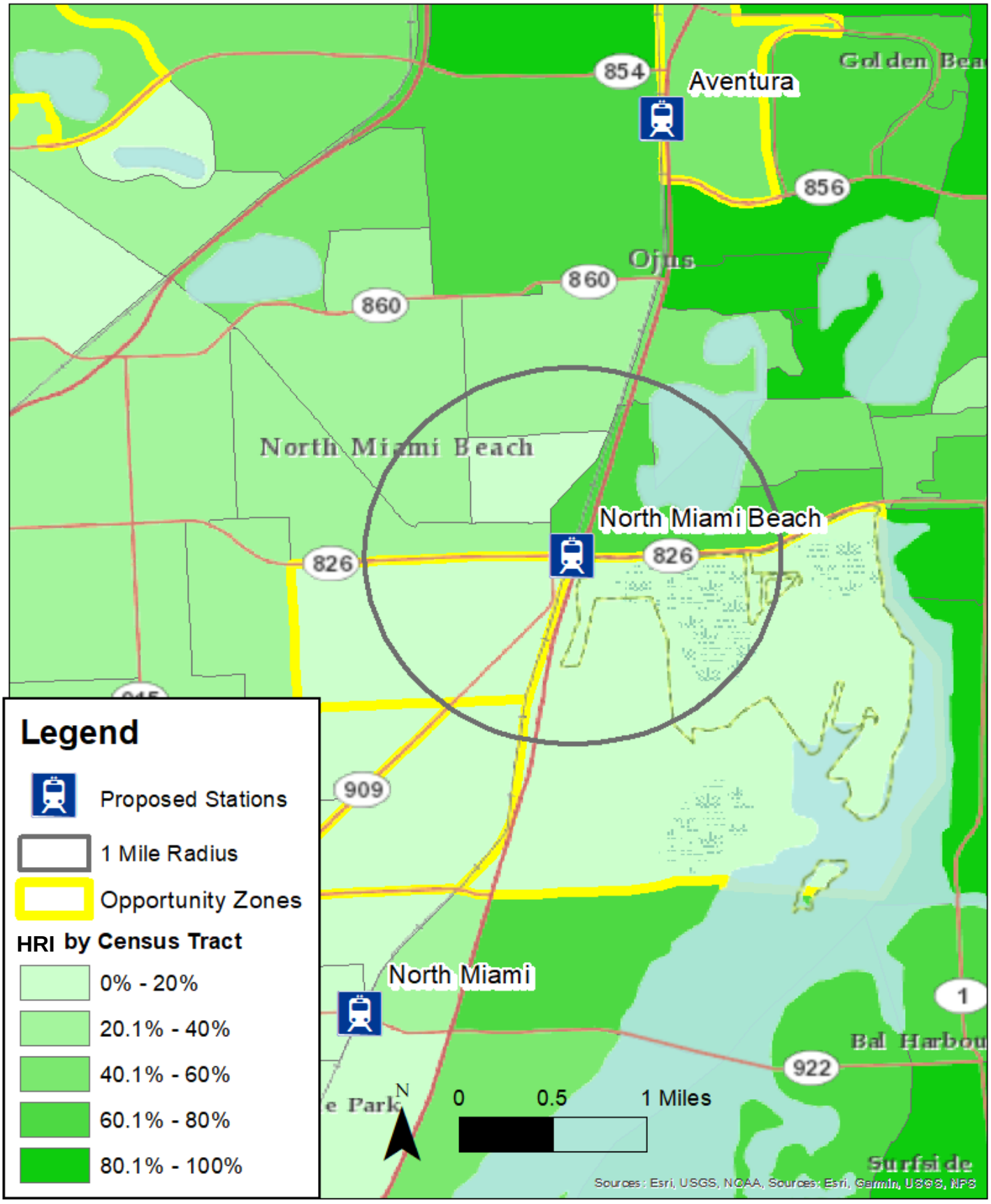
79th Street Station HRI



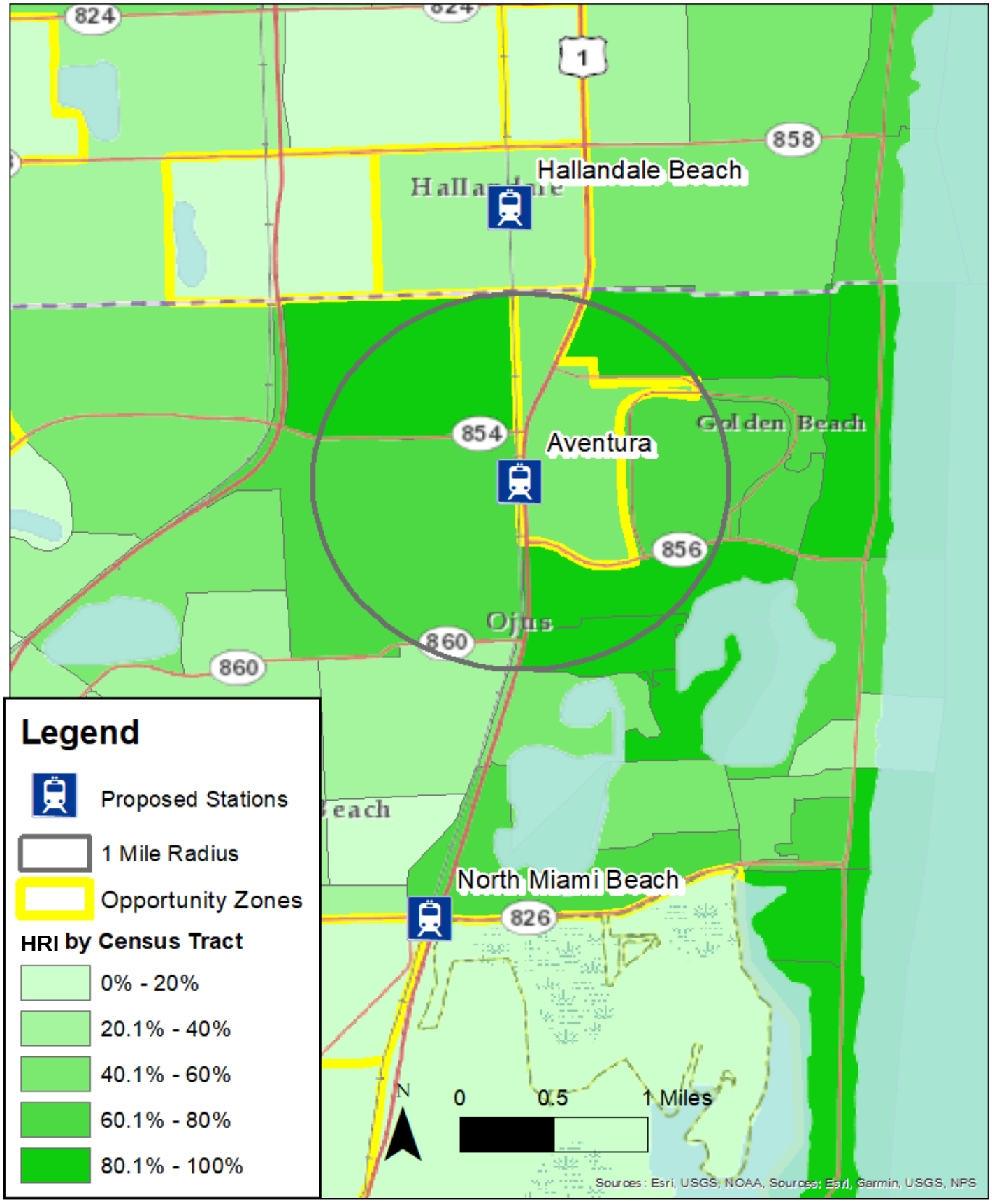
North Miami Station HRI



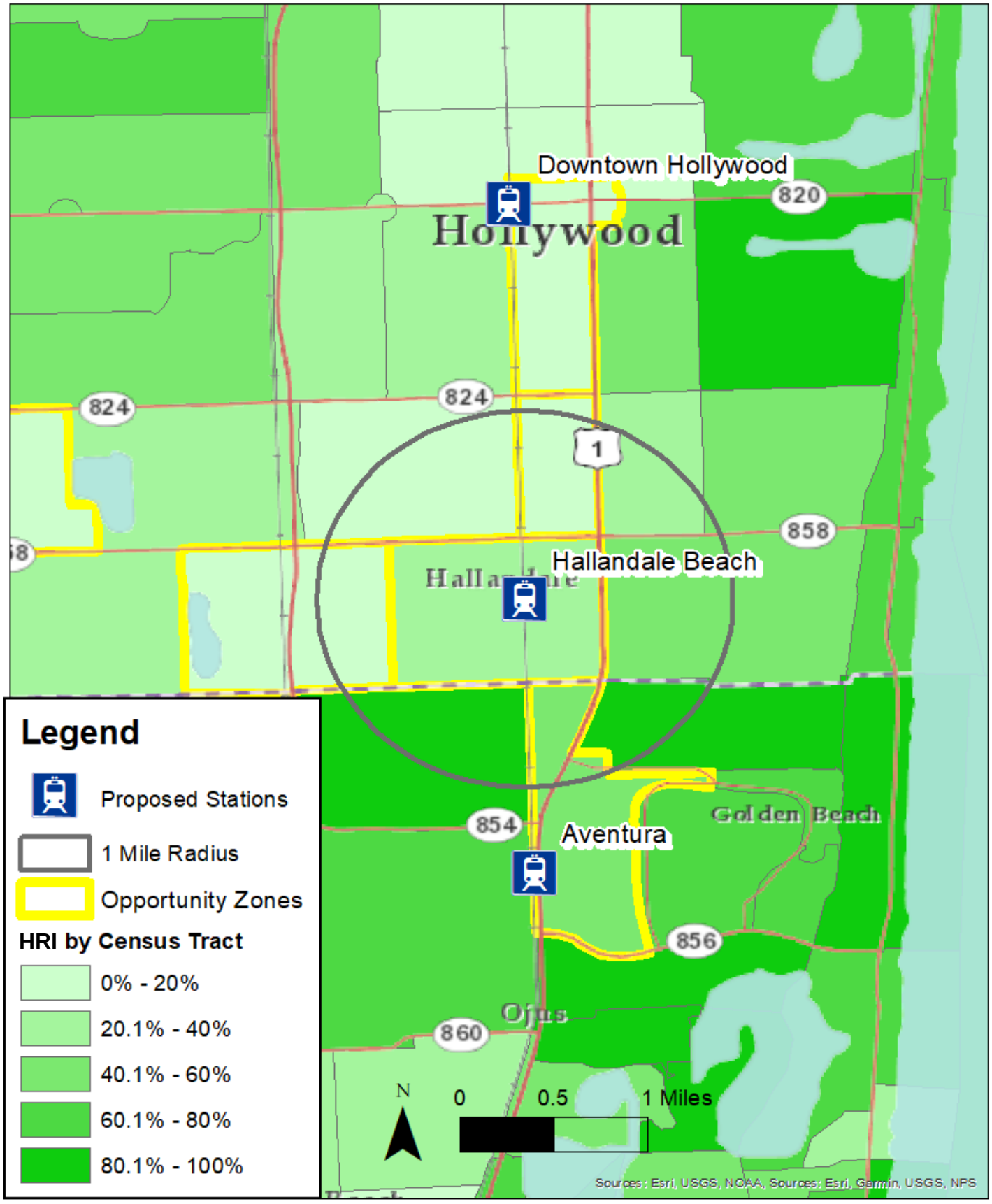
North Miami Beach Station HRI



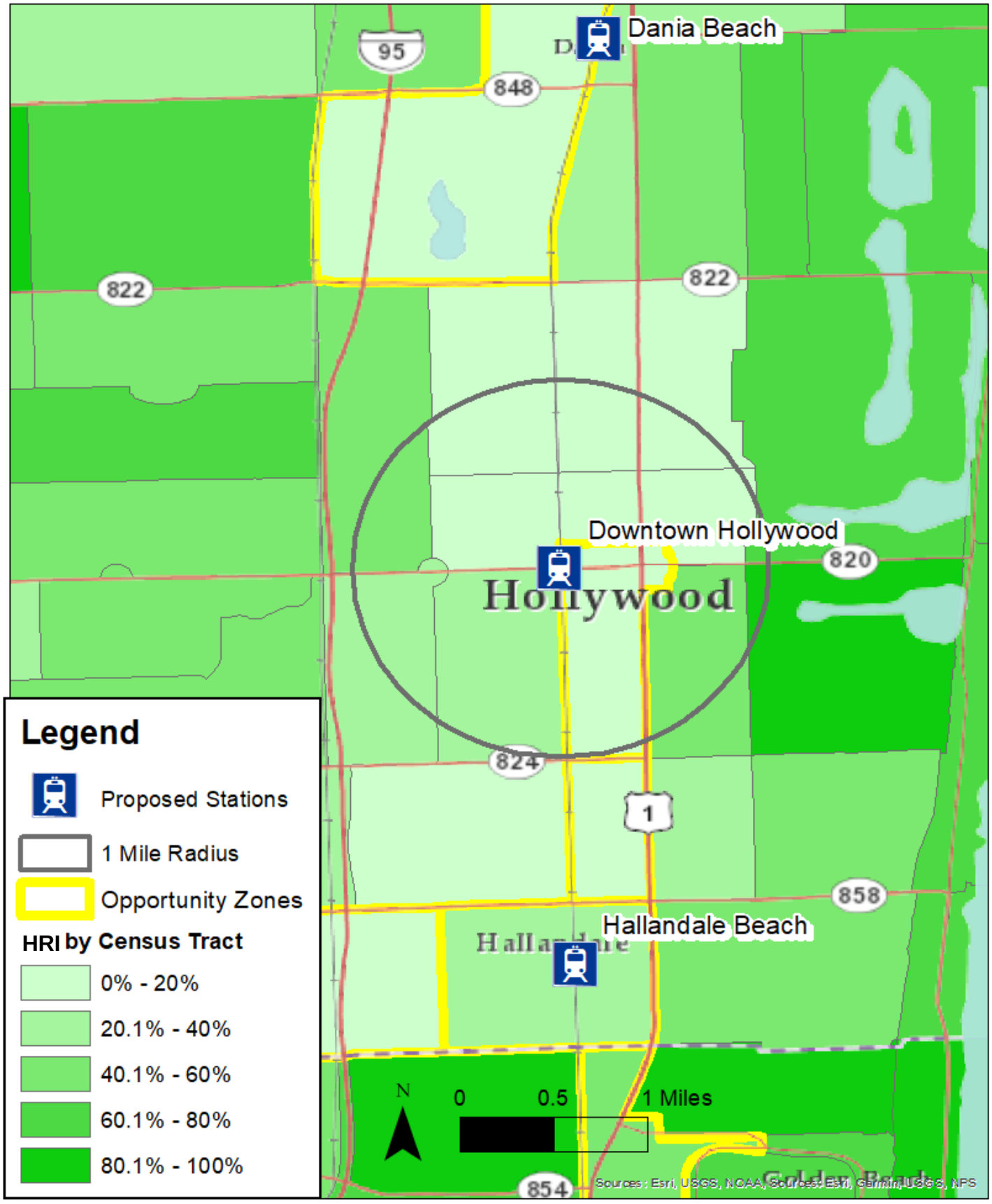
Aventura Station HRI



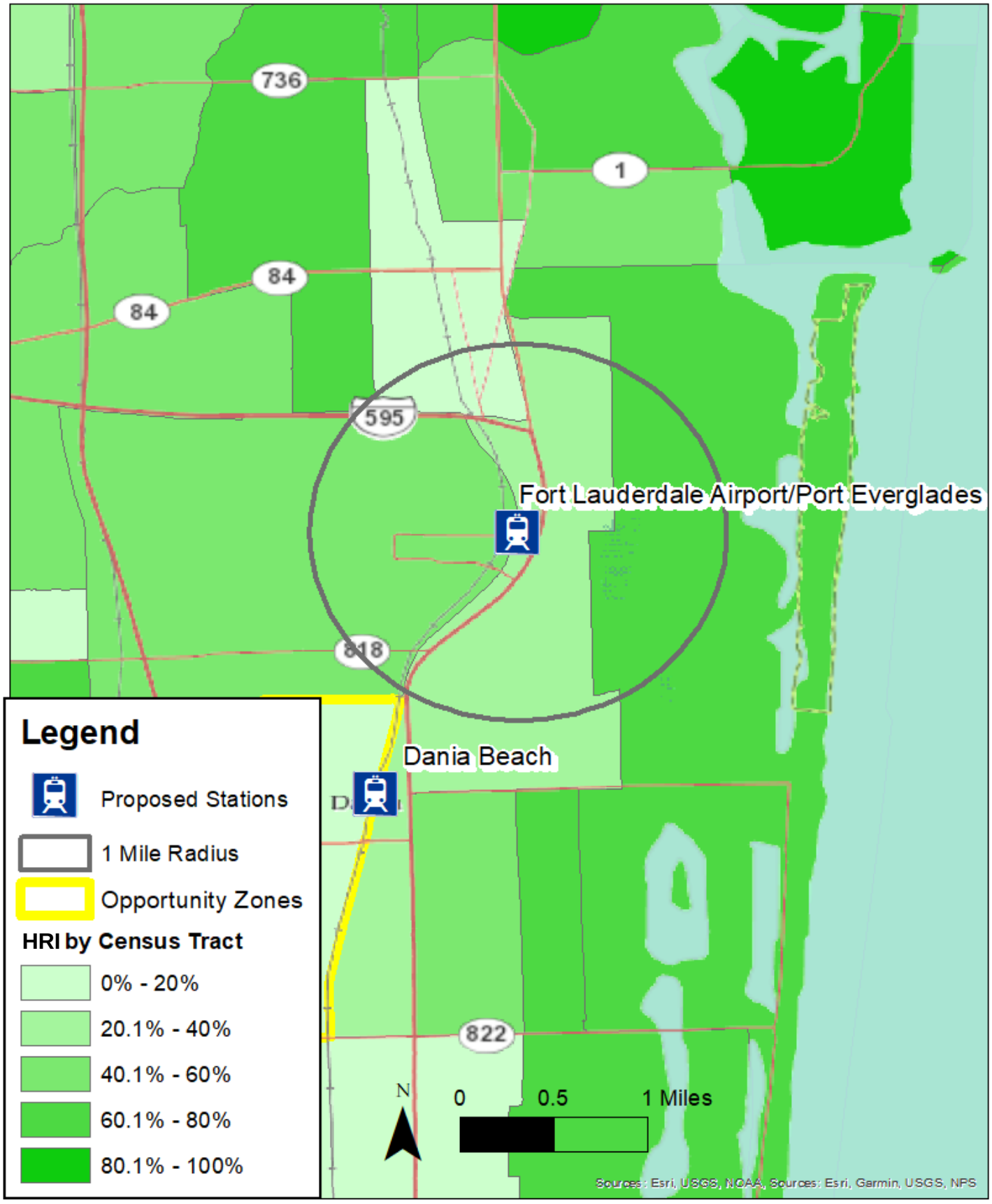
Hallandale Beach Station HRI



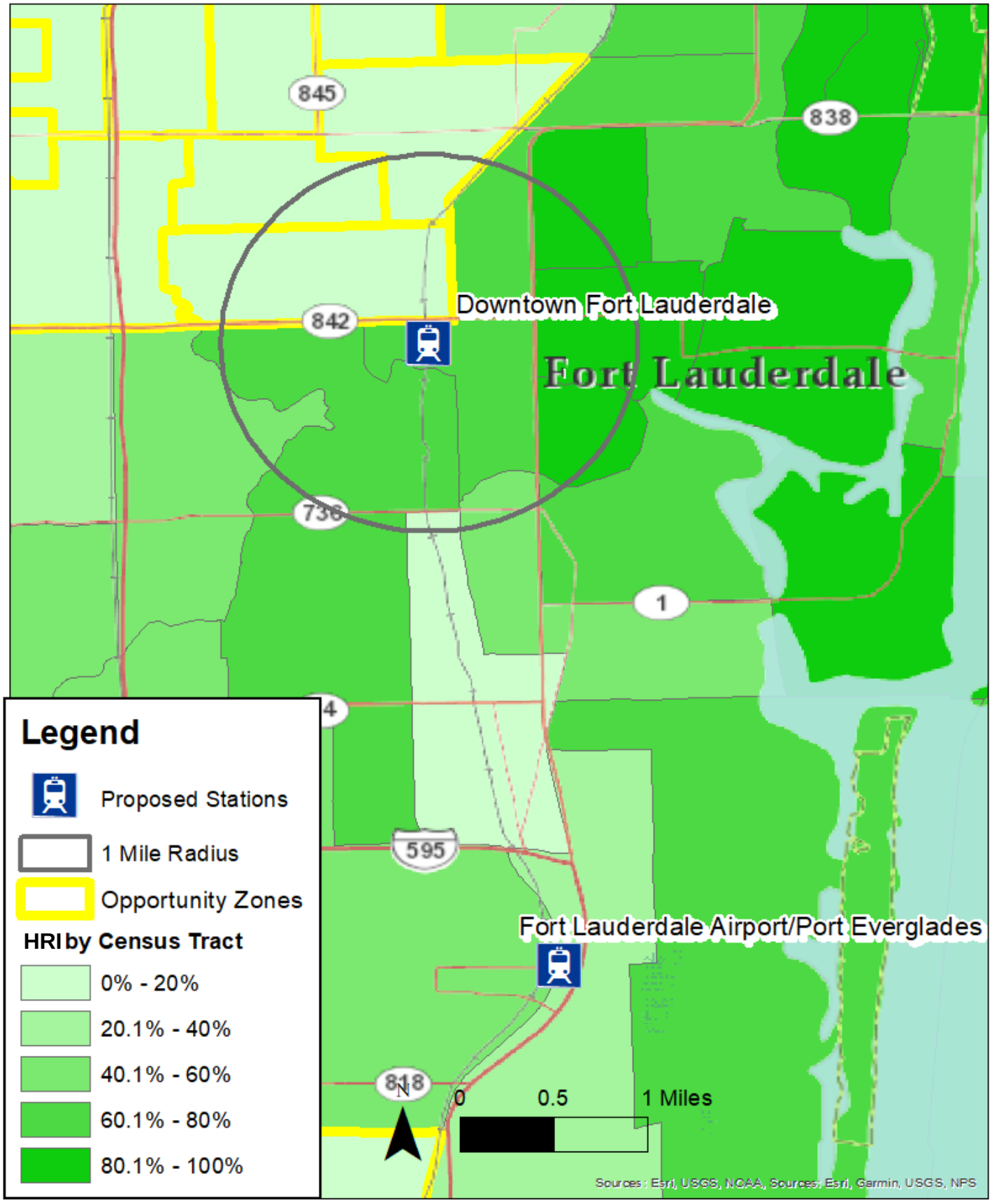
Downtown Hollywood Station HRI



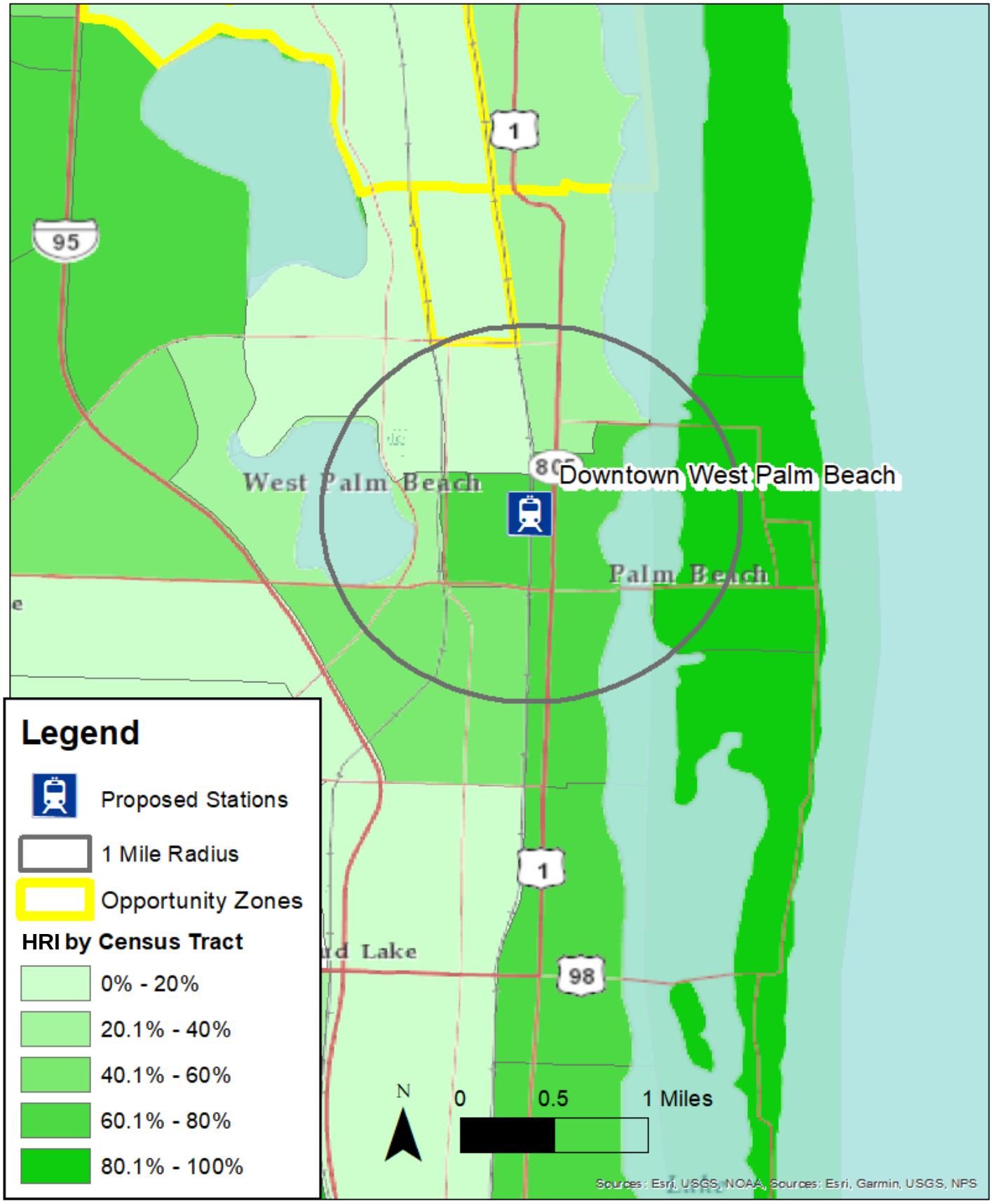
Fort Lauderdale Airport Station HRI



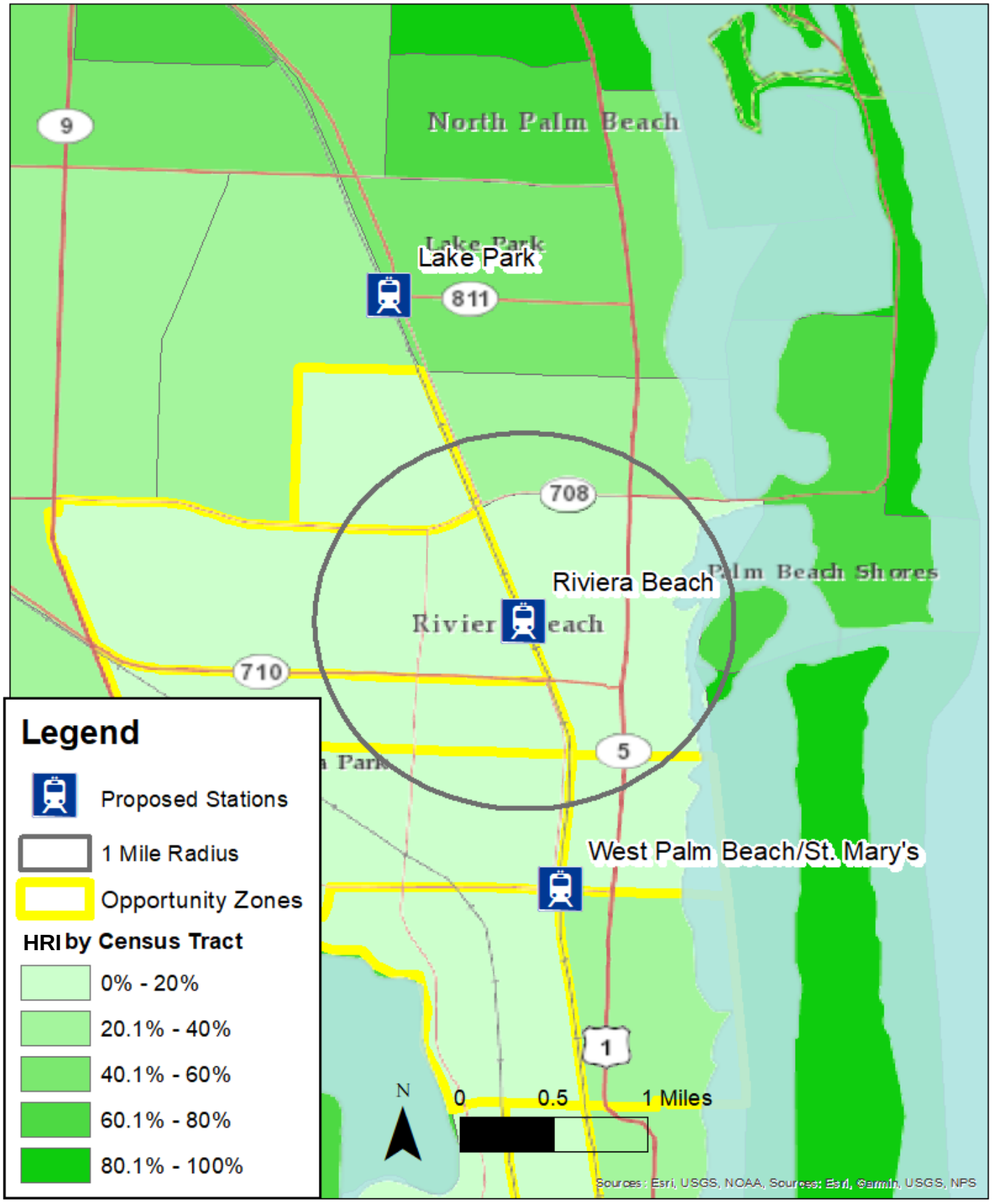
Downtown Fort Lauderdale Station HRI



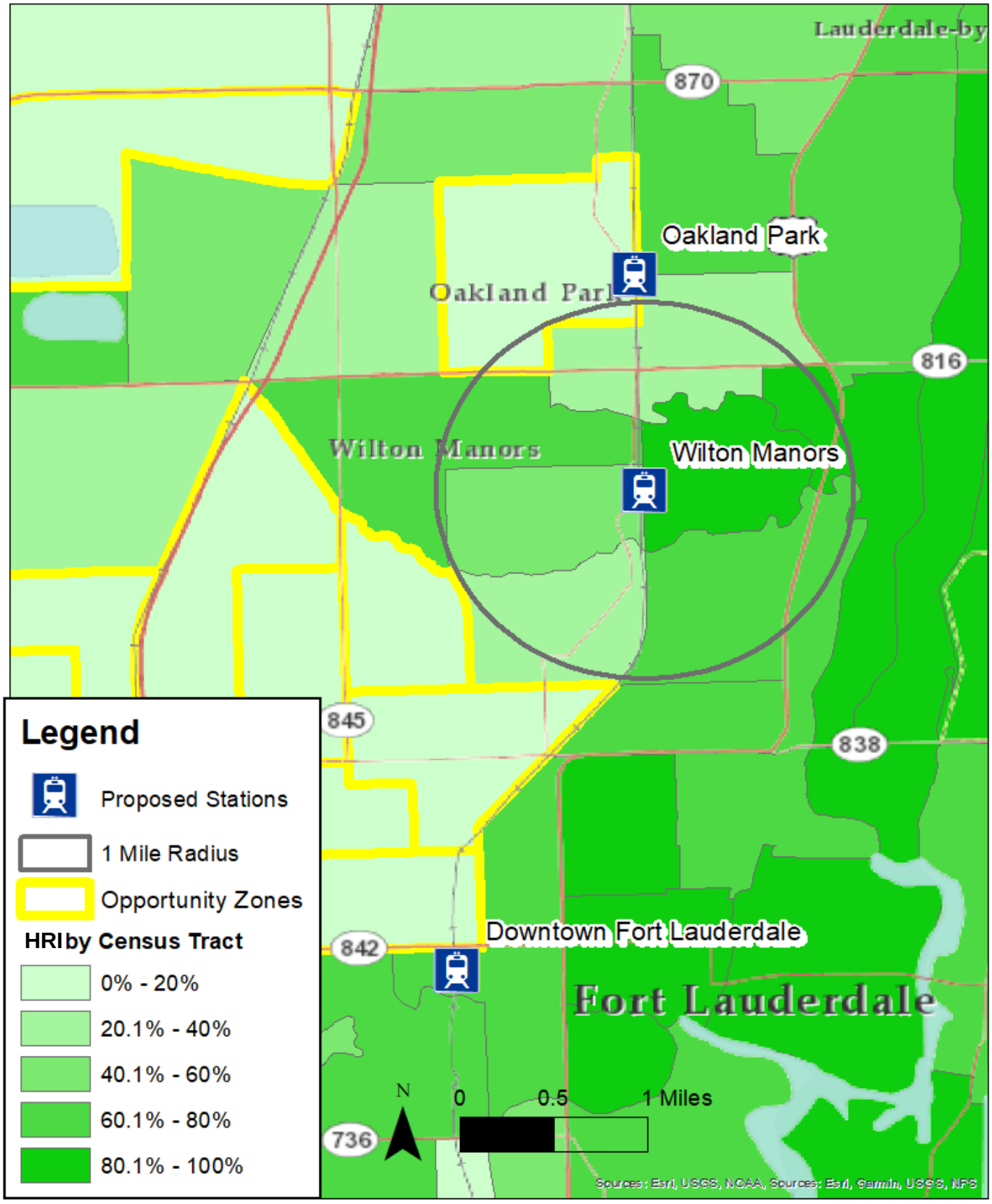
Downtown West Palm Beach Station HRI



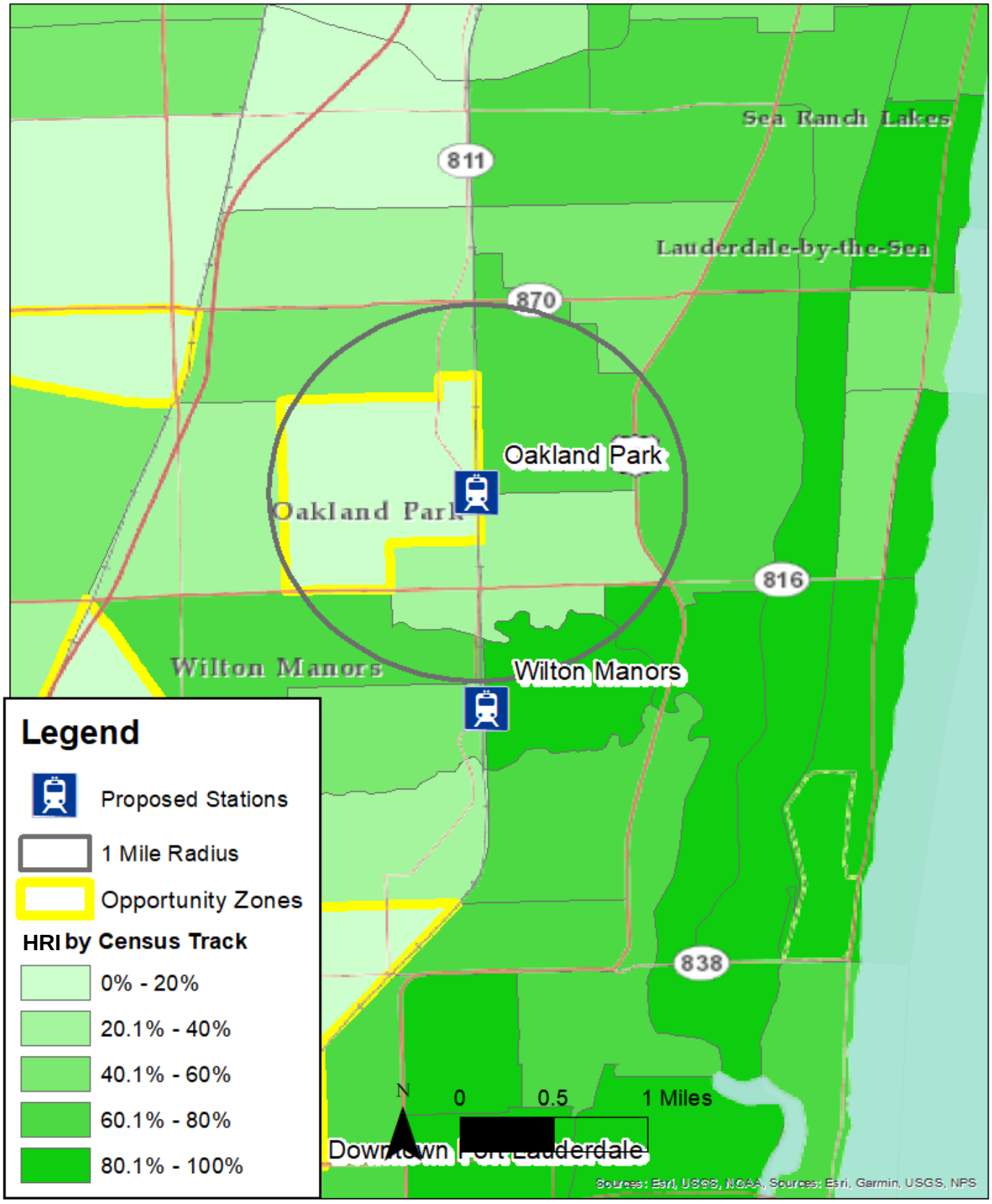
Riviera Beach Station HRI



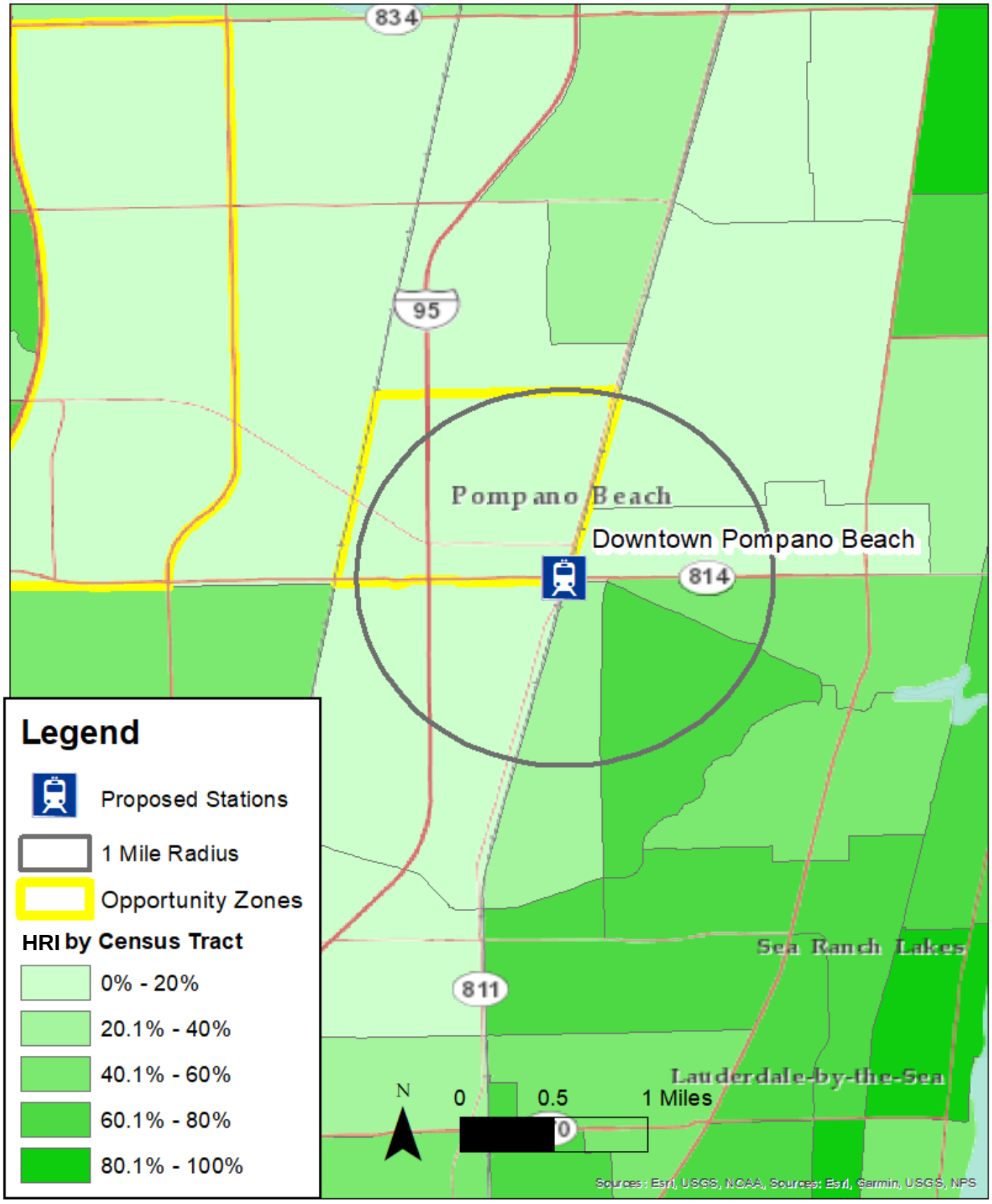
Wilton Manors Station HRI



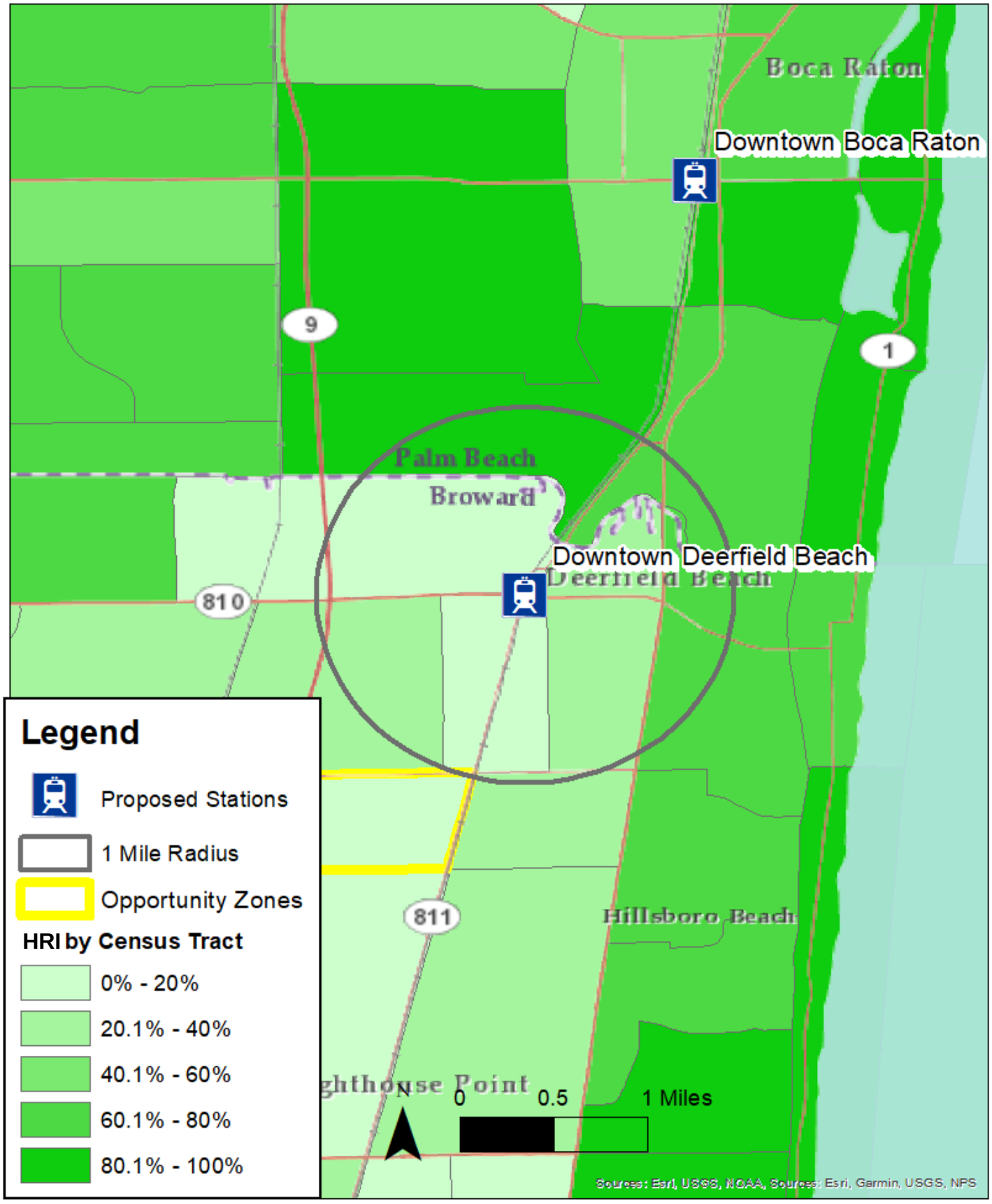
Oakland Park Station HRI



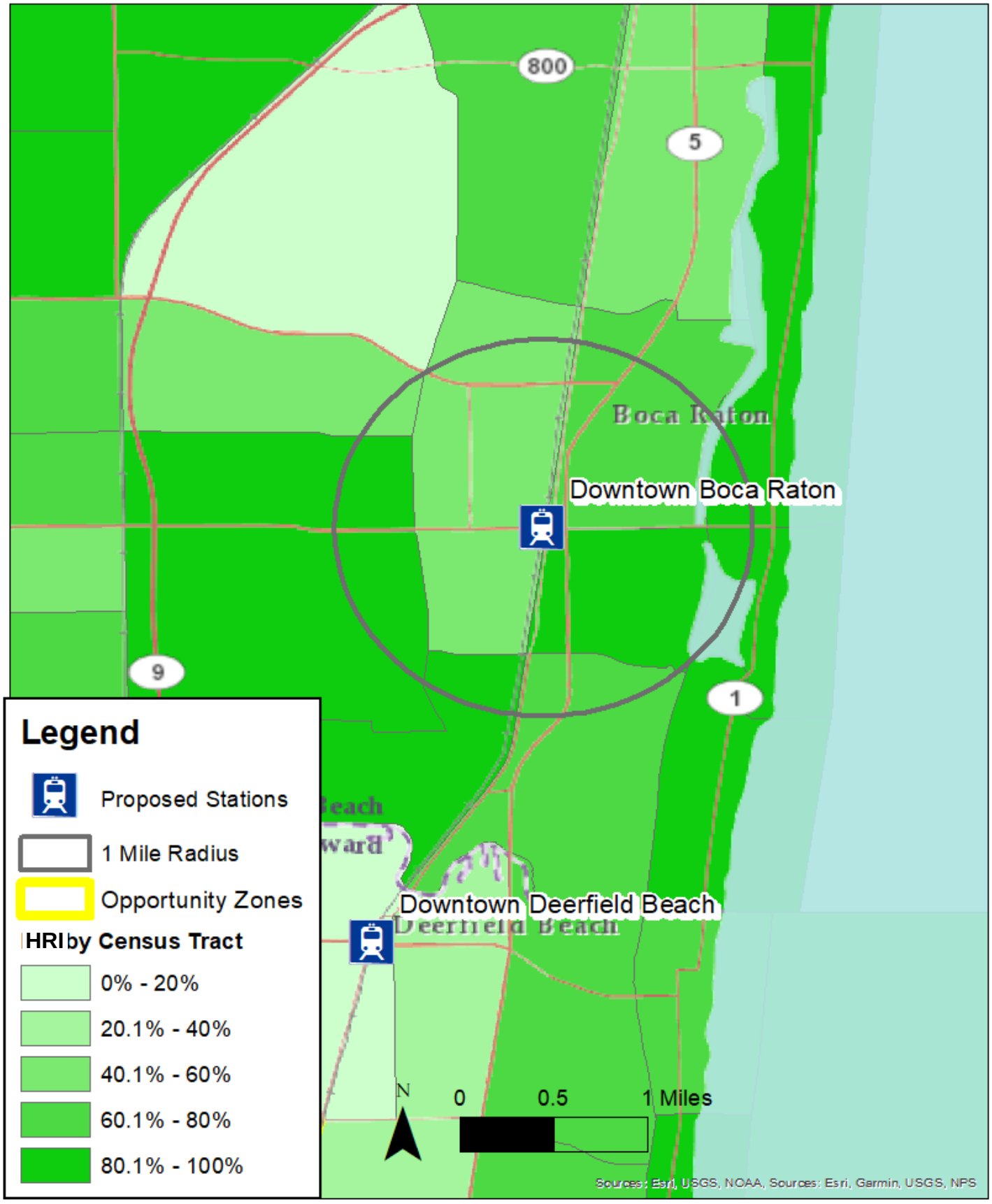
Downtown Pompano Beach Station HRI



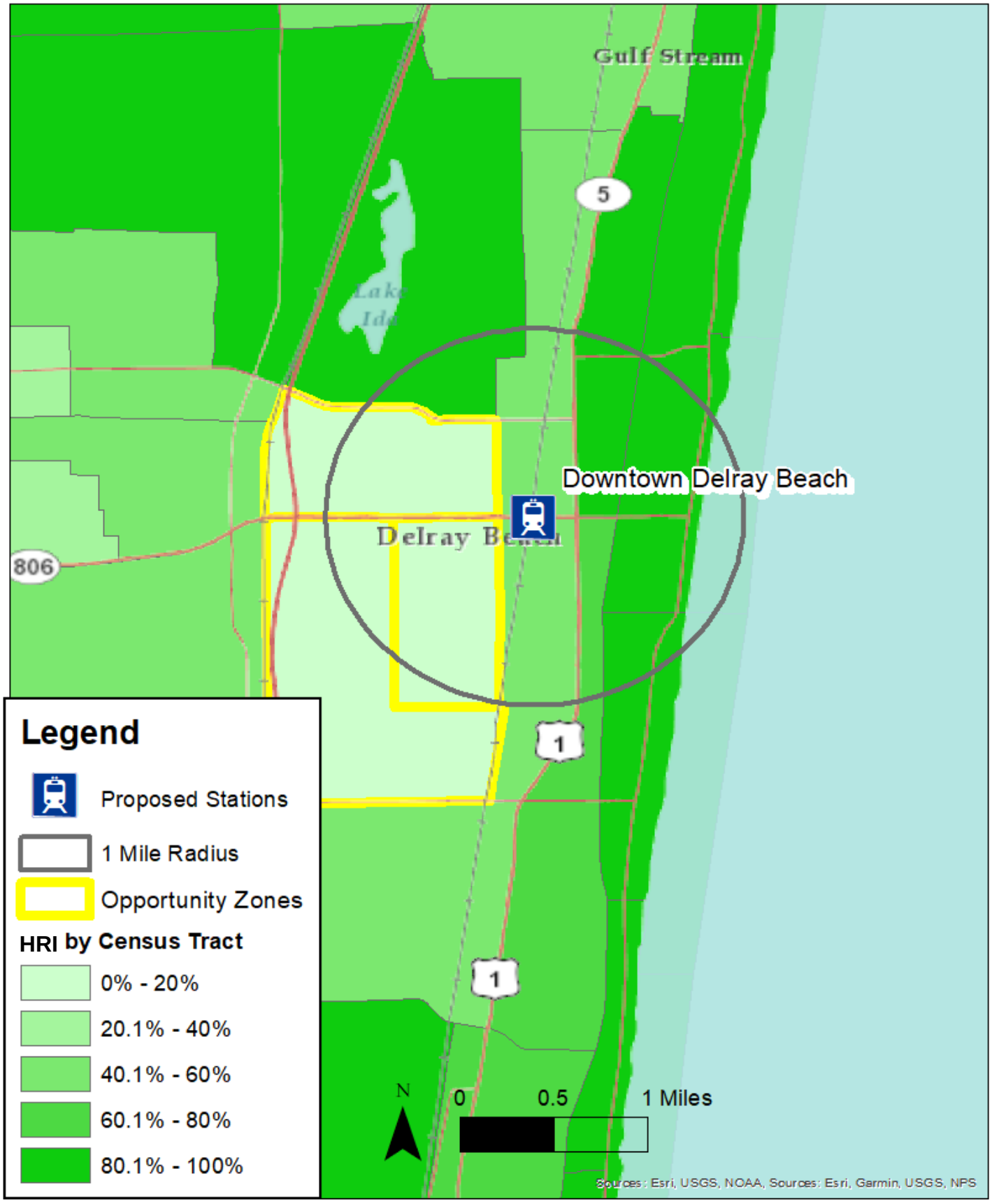
Downtown Deerfield Beach Station HRI



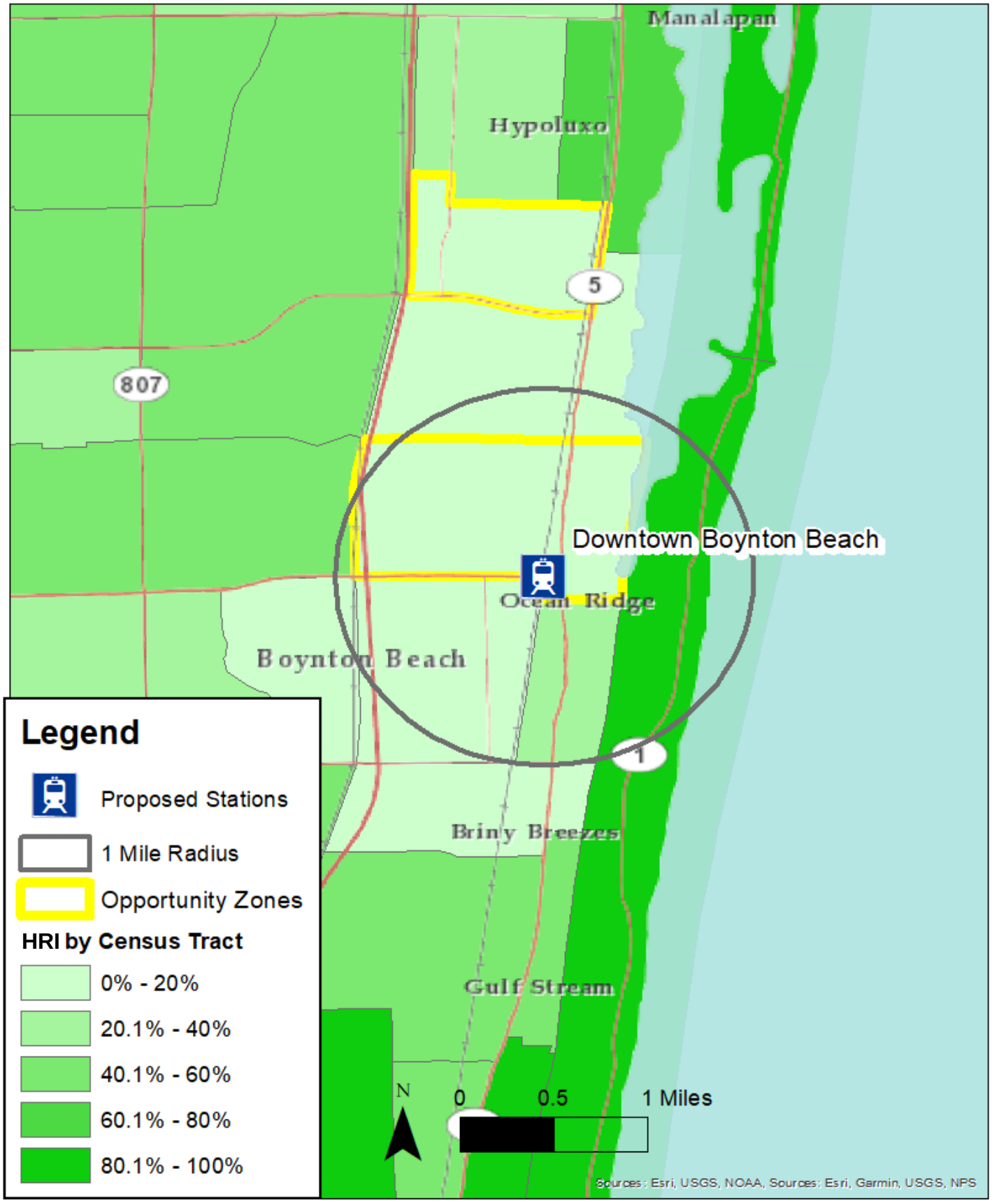
Downtown Boca Raton Station HRI



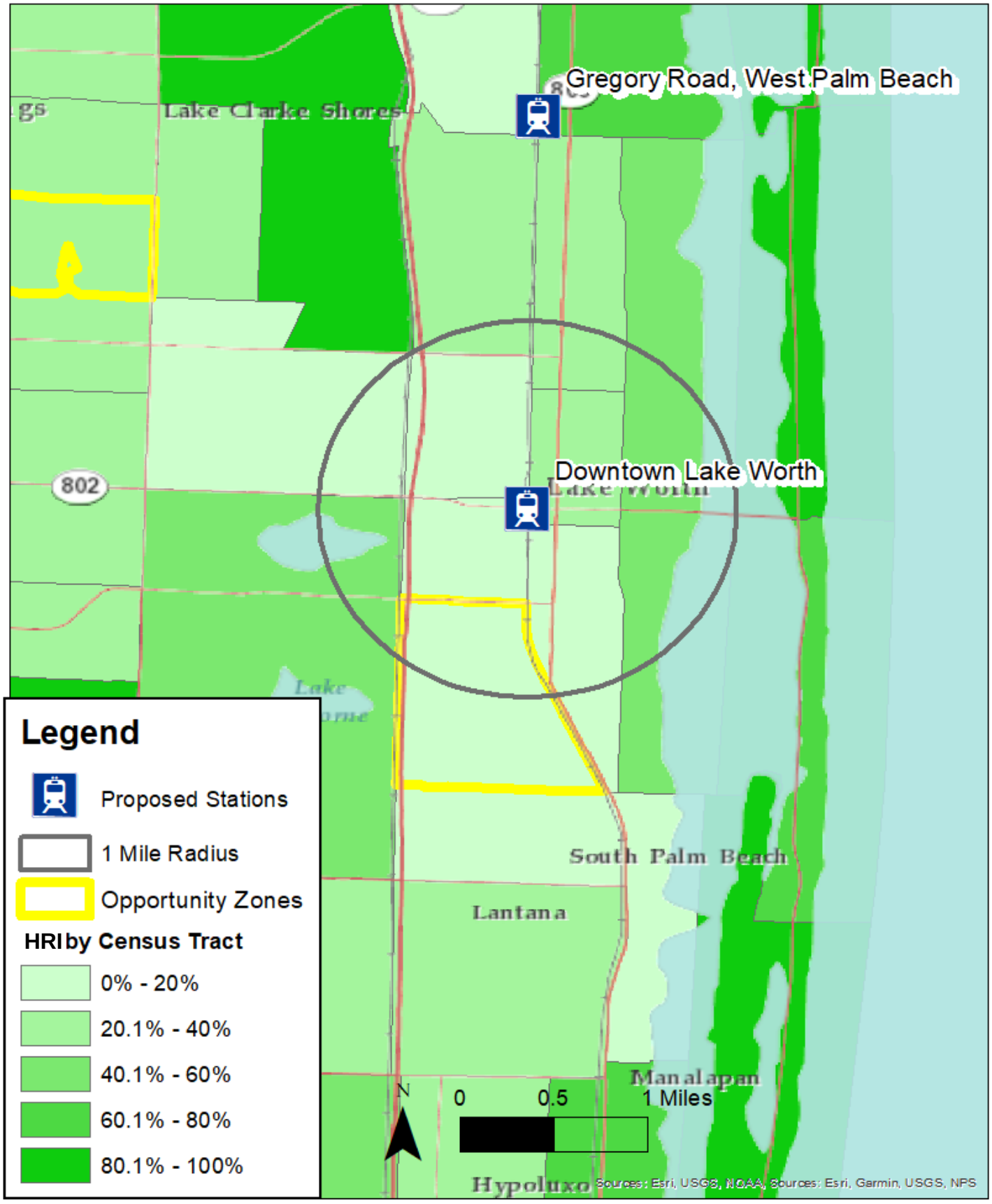
Downtown Delray Beach Station HRI



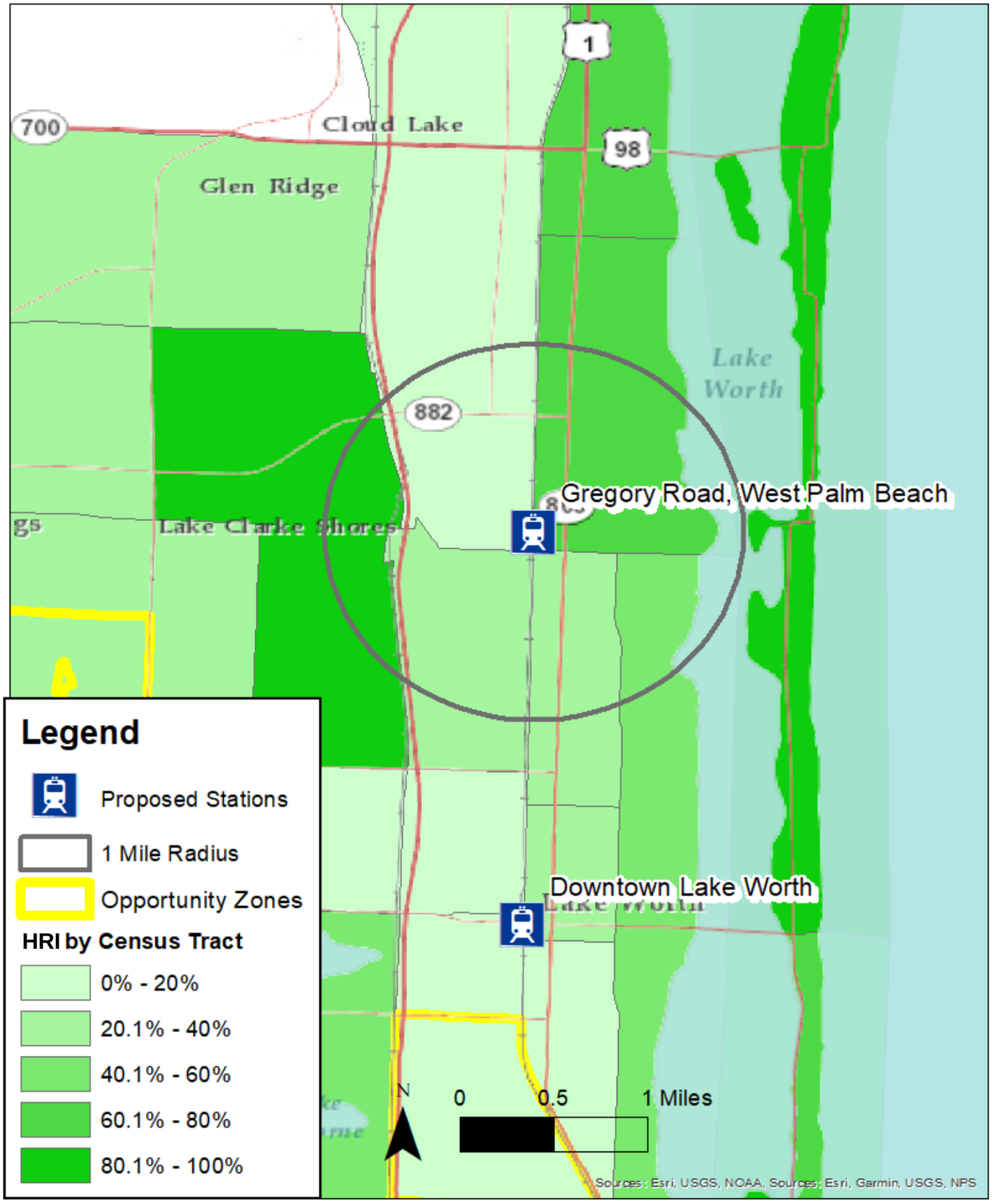
Downtown Boynton Beach Station HRI



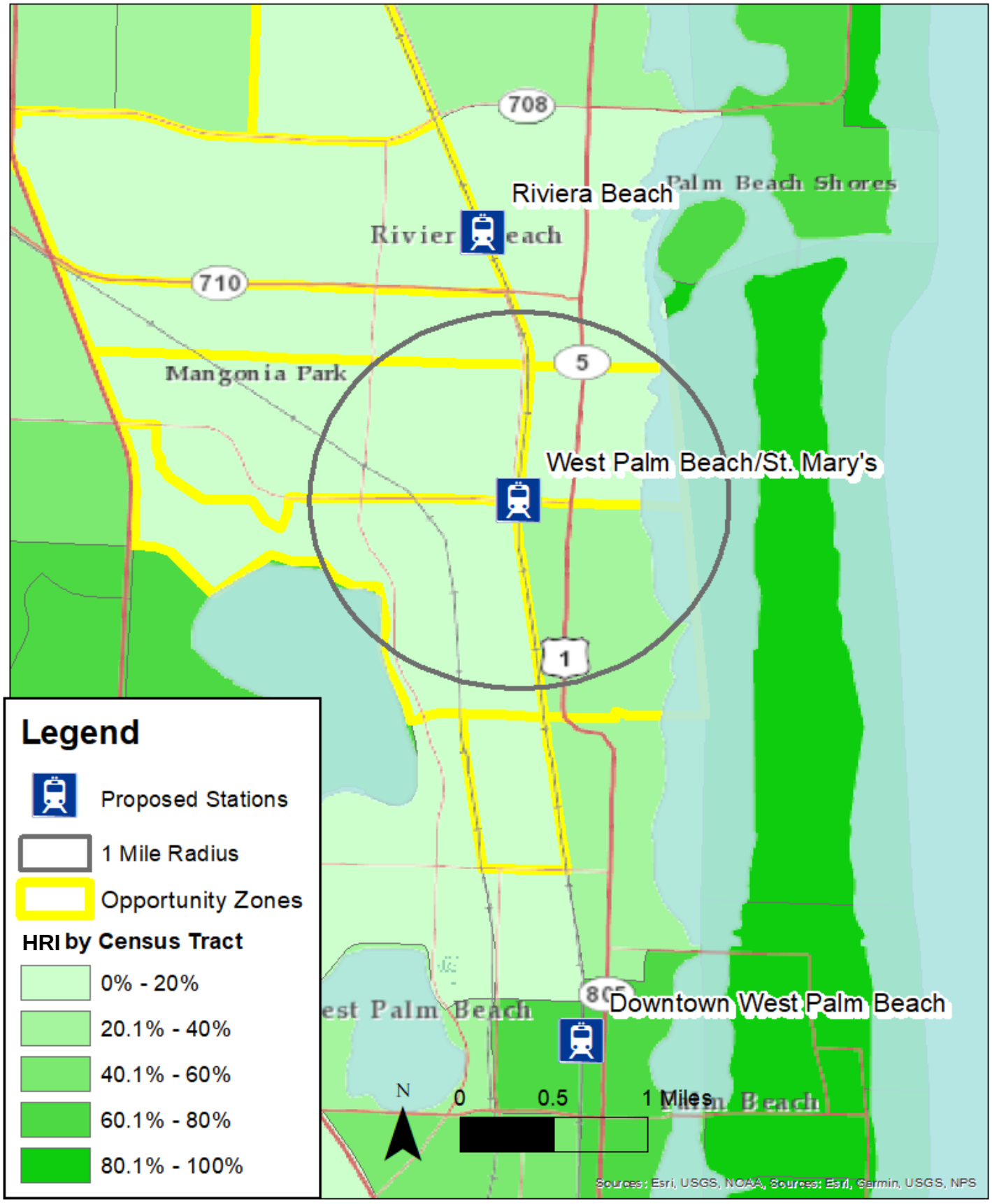
Downtown Lake Worth Station HRI



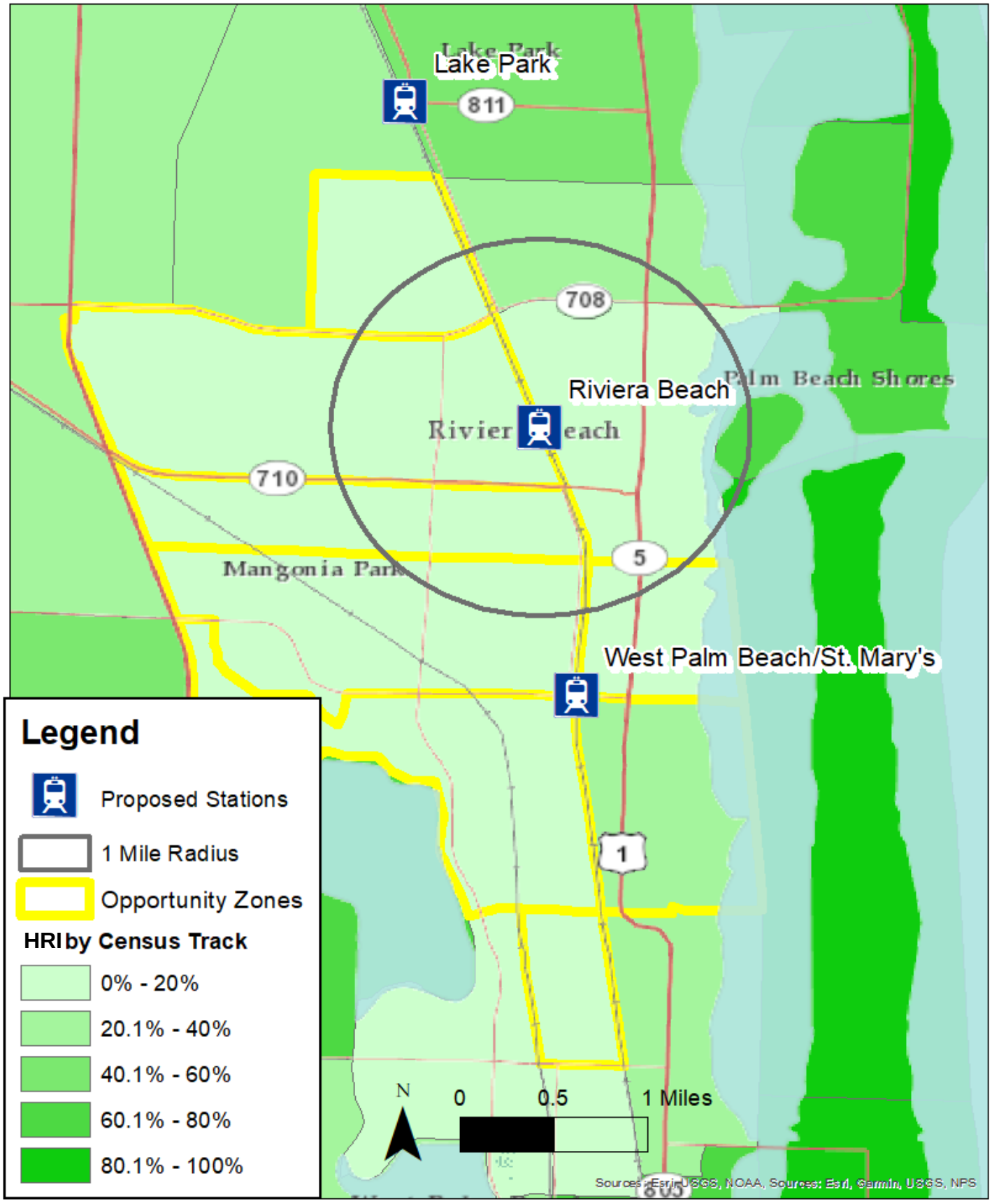
Gregory Road Station HRI



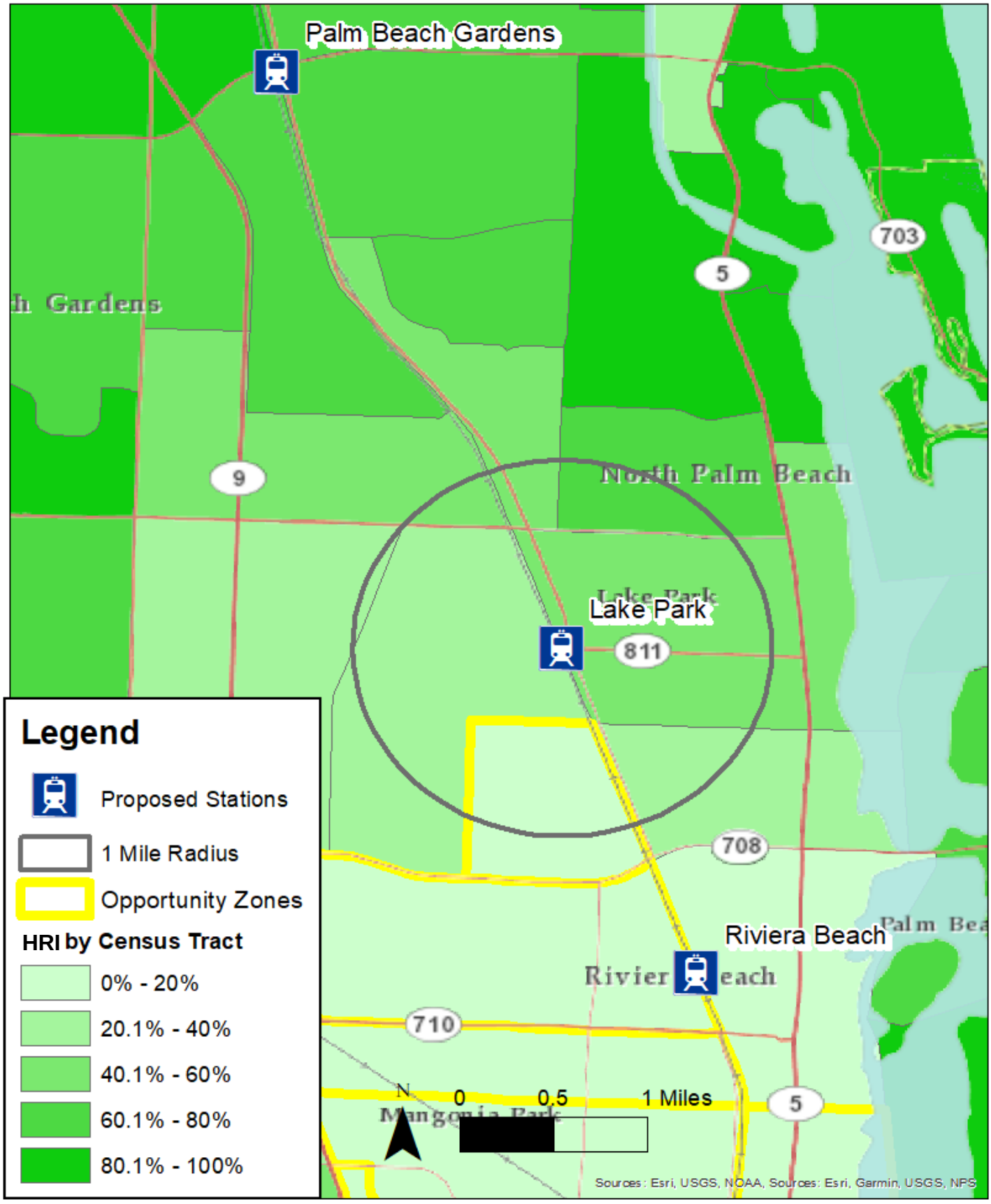
West Palm Beach/St. Mary's Station HRI



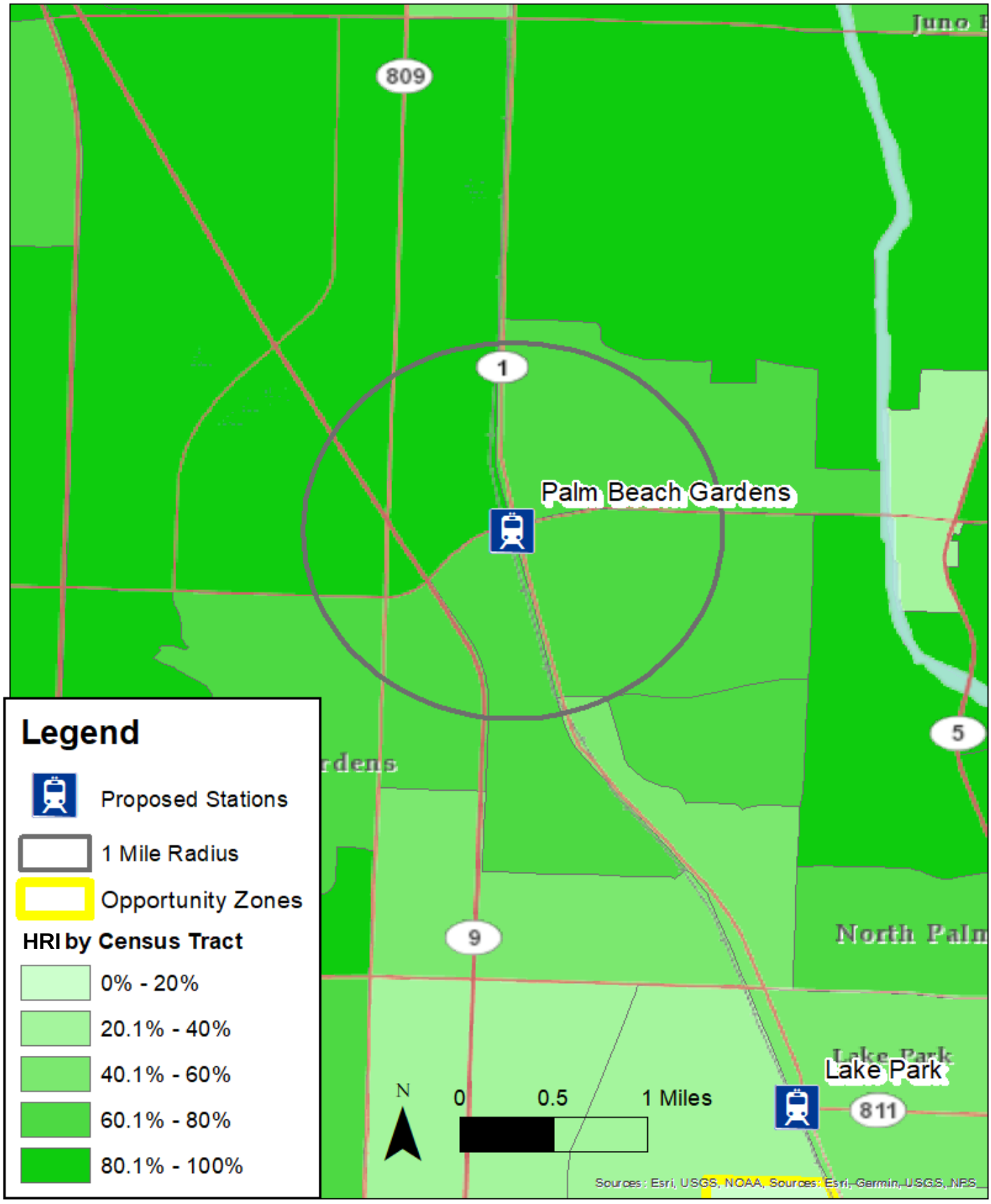
Riviera Beach Station HRI



Lake Park Station HRI



Palm Beach Gardens Station HRI



Jupiter Station HRI