

# Memorandum



**Date:** October 2, 2012

Supplement to  
Agenda Item No. 8K2

**To:** Honorable Chairman Joe A. Martinez  
and Members, Board of County Commissioners

**From:** Carlos A. Gimenez  
Mayor

A handwritten signature in black ink, appearing to read "Carlos A. Gimenez".

**Subject:** Supplemental Information to Item 8K2-121692 - Neighborhood Stabilization Program (NSP) Substantial Amendment Adding Public Comments Received after the September 12, 2012 EDSS Committee Meeting

This supplemental information is presented to the Board of County Commissioners (Board) to include the public comments received for the Neighborhood Stabilization Program Substantial Amendment. The 15-day public comment period for the amendment was Thursday, August 30, 2012 to Thursday, September 13, 2012, as required by the United States Housing and Urban Development (US HUD) for this program. In addition, the amended plan was posted on the County's website in accordance with the program guidelines. During the public comment period, two comments were received and are attached for the Board's review and consideration. First, comments were received from a longstanding Section 8 landlord who expressed concerns regarding the short length of time provided for public comment and the data referenced in the amendment. Second, the Miami Coalition for the Homeless, Inc. expressed the desire to have more units for the extremely-low-income, or those families at 30 percent of the area median income (AMI). The County does address this income level in the Request for Applications (RFA) by giving applicants extra points if they are willing to set-aside units for the extremely low-income. However, for NSP, developers determined that it is necessary to house the very-low-income, or those at 50 percent AMI. This allows enough rent to be collected in order for the property to cover its operating expenses. These comments were considered by PHCD, however staff concluded that revisions to the item were not warranted.

The comments will be attached and made a part of the Plan that will be submitted to US HUD for approval.

Attachment

A handwritten signature in black ink, appearing to read "Russell Benford".

Russell Benford, Deputy Mayor

**From:** [laneg@kipkrista.com](mailto:laneg@kipkrista.com)  
**To:** Fortner, Gregg (PHCD); Brown, Clarence D. (PHCD); Mayor; Grice, Sorita L. (Office of the Mayor)  
**Cc:** [Lynn.Paskewich@kipkrista.com](mailto:Lynn.Paskewich@kipkrista.com)  
**Subject:** OBJECTIONS AND COMMENTS ON The NSP-SUBSTANTIAL AMENDMENT.  
**Date:** Thursday, September 13, 2012 11:59:41 PM

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Dear Mr. Fortner and Mr. Brown-

We strongly object to the above Amendment for many reasons, including but not limited to the lack of a proper and legal Public Comment Period and proper Public Notices for Comment.

The data in this lengthy plan is very outdated and is missing dates of comment periods and signatory and other dated information.

As normal, this plan substantially discriminates against South Dade in favor of politically selected areas.

The data prepared by a California firm is not accurate!

The plan does not mention that Judge Bailey, Administrative Judge just lifted the Administrative Moratorium on June 11, 2012 that froze Residential Mortgage Foreclosures dated back to 2006.

The Administration Fees are extremely inflated for this Grant and Program.

The Certification concerning laws being followed is not true as experienced by us since becoming Section 8 Landlords in 1984.

These are just a few comments, due to the deadline being so quick!!!

Sincerely,

Lance G. Paskewich

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## WORKING TO END HOMELESSNESS

**TO:** Gregg Fortner, Director  
Miami-Dade County Department of Public Housing and Community Development

**FROM:** Terry A. Coble  
Policy & Program Director

Bobbie Ibarra  
Executive Director

**RE:** Comments on the Proposed Substantial Amendment to Miami-Dade County's  
Consolidated Plan regarding the third Neighborhood Stabilization Program (NSP3)

**DATE:** September 13, 2012

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I am pleased to submit the following comments to the Draft Substantial Amendment to the Miami-Dade County Consolidated Plan for use in implementing the federal Neighborhood Stabilization Program 3 (NSP3) program.

In general, Miami-Dade County staff is to be commended for putting together a workable plan that is attuned to the needs of our community. Overall, the Miami Coalition for the Homeless strongly supports the plan's emphasis on affordable rental housing, our county's greatest need, as well as the emphasis on benefiting households with very low income. We are concerned however, that the proposed amendment makes no mention of the county's households with the greatest need for subsidized housing, i.e., those with extremely-low income (ELI) and below ( $\leq$  30% AMI). We are also concerned that, as written, the affordability requirements do not protect low income tenants from rental cost-burden. The following are our detailed comments.

### FUNDING ALLOCATION

1. The Miami Coalition for the Homeless is pleased with the plan's allocation on page 55 under **TOTAL BUDGET** of a substantial amount of funding for acquisition and rehabilitation of multi-family properties for use as rental housing and for redevelopment of vacant property under HOPE VI. This is both appropriate and necessary, since it will address the housing needs of renters whose homes have either been lost to foreclosure or to the demolition of public housing occasioned by HOPE VI, and will allow the limited amount of federal funds to assist more families.
2. On the other hand, because Miami-Dade County is home to a disproportionately large number of extremely-low income (ELI) households, the Miami Coalition for the Homeless strongly recommends that the Substantial Amendment include a set-aside for these households. Affordable housing for ELI households is identified in the newly adopted Consolidated Plan as

one of the County's highest priorities. NSP3 funding is ideally suited to help create this housing because a portion of the funds can be set-aside as an operating subsidy to compensate for the lower rental income received from ELI households. For this reason, the Miami Coalition for the Homeless recommends that the plan specify that at least 20 percent of the units be set-aside for extremely-low income (ELI) households, i.e., those with income less than or equal to 30 percent of Area Median Income. This will bring the NSP substantial amendment more in line with the newly enacted Consolidated Plan and will also help address one of the County's most important housing needs.

#### **AFFORDABILITY REQUIREMENTS**

1. The Miami Coalition for the Homeless is also concerned that as written, the affordability requirements will cause households to be cost-burdened by the rents they will be charged. The Miami Coalition for the Homeless believes that to be truly affordable to VLI and ELI households, the rents charged by developers benefiting from NSP3 funding should not be computed based on a percentage of Area Median Income, as allowed under the federal housing tax credit program (LIHTC), but should instead be based on the income of the tenant. We therefore urge the Department to ensure the protection of VLI and ELI households against rental cost-burden by requiring multifamily properties funded with NSP3 moneys to set rents at thirty percent of monthly gross income not in excess of the maximum market rent. This change to the Substantial Amendment can be accomplished by removing the last sentence in the Response to Section C(2) (p.33), and by also removing the first underlined sentence under "Multifamily Rental Properties" on page 34.

Thank you for the opportunity to submit these comments. We look forward to continuing to work with the Department.