Miami-Dade County

GOULDS AREA POTENTIAL CRA FINDING OF NECESSITY DECEMBER 2015



PMG Associates, Inc.

SECTION 1 INTRODUCTION

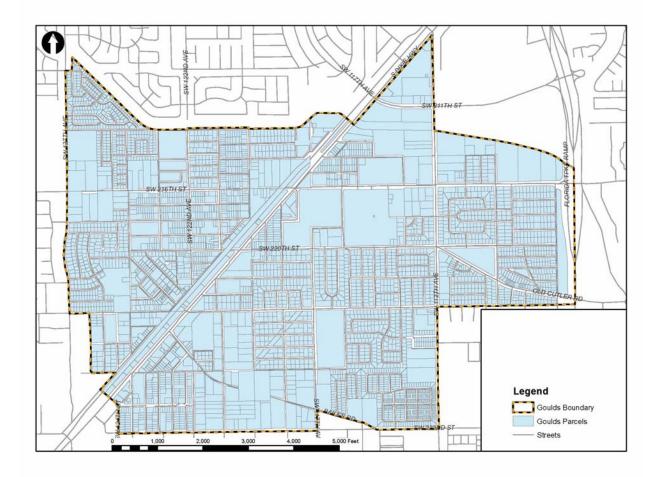
1.1 HISTORY AND PURPOSE

This document represents the analysis of the Finding of Necessity (FON) for the formation of a Community Redevelopment Area (CRA) in the Goulds neighborhood. This formation is proposed to better serve the community and to further address the concerns of the Goulds area.

Exhibit 1-1 illustrates the proposed Goulds CRA boundaries. The area is approximately 1,526 acres and contains 3,674 parcels. The area is generally the area east of SW 127th Avenue, south of the C-100 canal, west of the Turnpike, and north of Silver Palm Drive.

Consistent with State Law, the Finding of Necessity examines the character of the area and measures statistics and other documentation to determine if the conditions of slum and blight have been met, as described in Florida Statutes 163. Part III section 163.340 (7)(8). This analysis will examine each of the criteria and determine if the proposed area meets these conditions.

EXHIBIT 1-1 – GOULDS PROPOSED CRA BOUNDARY MAP



Source: Miami-Dade County

1.2 METHODOLOGY

The analysis of the conditions that exist in the proposed CRA area was conducted using data available from documented sources throughout the community. Agencies within Miami-Dade County were contacted and data was supplied to examine the characteristics of the community. Additional research was conducted through field observations and photographic evidence to underscore the findings.

Each of the criteria as established by State Law will be discussed separately and the data sources used for the analysis will be described in each section.

1.3 LEGAL REQUIREMENTS

The requirements of the FON are established in Section 163.340 of the Florida Statutes and are described as follows:

Slum Determination 163.340 (7)

"Slum area" is defined as an area having physical or economic conditions conducive to disease, infant mortality, juvenile delinquency, poverty, or crime because there is a predominance of buildings or improvements, whether residential or nonresidential, which are impaired by reason of dilapidation, deterioration, age, or obsolescence, and exhibiting one or more of the following factors:

- (a) Inadequate provision for ventilation, light, air, sanitation, or open spaces;
- (b) High density of population, compared to the population density of adjacent areas within the county or municipality; and overcrowding, as indicated by government-maintained statistics or other studies and the requirements of the Florida Building Code; or
- (c) The existence of conditions that endanger life or property by fire or other causes.

Blight Determination 163.340 (8)

"Blighted Area" is defined as an area in which there are a substantial number of deteriorated, or deteriorating structures, in which conditions, as indicated by government-maintained statistics or other studies, are leading to economic distress or endanger life or property, and in which two or more of the following factors are present:

- (a) Predominance of defective or inadequate street layout, parking facilities, roadways, bridges, or public transportation facilities;
- (b) Aggregate assessed values of real property in the area for ad valorem tax purposes have failed to show any appreciable increase over the 5 years prior to the finding of such conditions;

Finding of Necessity – Goulds

- (c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;
- (d) Unsanitary or unsafe conditions;
- (e) Deterioration of site or other improvements;
- (f) Inadequate and outdated building density patterns;
- (g) Falling lease rates per square foot of office, commercial, or industrial space compared to the remainder of the county or municipality;
- (h) Tax or special assessment delinquency exceeding the fair value of the land;
- (i) Residential and commercial vacancy rates higher in the area than in the remainder of the county or municipality;
- (j) Incidence of crime in the area higher than in the remainder of the county or municipality;
- (k) Fire and emergency medical service calls to the area proportionately higher than in the remainder of the county or municipality;
- (l) A greater number of violations of the Florida Building Code in the area than the number of violations recorded in the remainder of the county or municipality;
- (m) Diversity of ownership or defective or unusual conditions of title which prevent the free alienability of land within the deteriorated or hazardous area; or
- (n) Governmentally owned property with adverse environmental conditions caused by a public or private entity.

SECTION 2 SLUM CONDITIONS

2.1 ANALYSIS OF SLUM CONDITIONS

The conditions that define "Slum" as outlined in Florida State Statues 163.340(7) in the potential CRA area are found in the following factors. In order for a proposed CRA area to qualify as having slum conditions, the area must have at least one of three factors.

TABLE 2-1 DEMOGRAPHIC DATA FOR GOULDS

Area	Violations
Population	11,786
Parcels	1,526
Households	3,368
Poverty rate	32.3%

Source: Miami-Dade RER, U.S. Census Bureau.

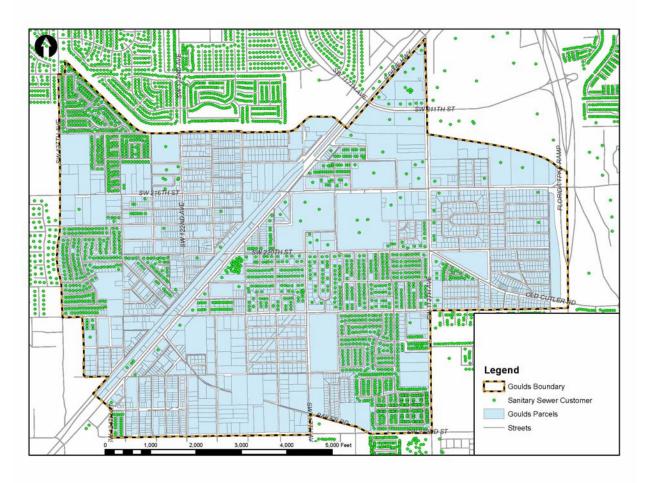
(a) Inadequate provision for ventilation, light, air, sanitation, or open spaces;

The conditions of inadequate housing can be categorized through the determination of "Unsafe Structures" as determined by the Florida Building Code. Data collected from the Miami-Dade Building Code Division reveals that the proposed CRA area has 12 "Unsafe Structures" within its borders. These citations cover the full range of conditions including inadequate ventilation, substandard housing and improper maintenance of the buildings.

In addition, Exhibit 2-1, on the next page, shows the sanitary sewer customers in the proposed CRA. The map shows that more than one-half of the proposed CRA does not have sewer service. The preponderance of septic tanks in the CRA poses health and sanitation risks for the area.

The population also has a higher than average incidence of poverty with 32.3% of families having household income levels below the Poverty Line. This data is found in Table 2-1.

EXHIBIT 2-1 SANITARY SEWER CUSTOMERS



Source: Miami-Dade County Water and Sewer Department

(b) High density of population, compared to the population density of adjacent areas within the county or municipality; and overcrowding, as indicated by government-maintained statistics or other studies and the requirements of the Florida Building Code

Density patterns can be measured by the amount of developed acres of land or by the amount of population per acre. Miami-Dade County contains approximately 2,000 square miles of the land area. However, only approximately 500 square miles are developed and within he Urban Development Boundary (UDB). Based on a population of approximately 2.5 million, the density of persons per acre in Miami-Dade County is 7.81.

In the potential CRA area, the population of 11,786 lives in a 1,533 acre area, for a density of 7.68 persons per acre. This is less dense than the County overall.

Finding of Necessity – Goulds

(c) The existence of conditions that endanger life or property by fire or other causes.

A review of the data from the Miami-Dade Fire Rescue Department reveals that in 2014, the proposed CRA area had a total of 2,109 emergency calls. Based on the population of 11,786, this equates to 178.9 calls per one thousand population. For the entire service area of Miami-Dade Fire Rescue during the same time, the population of 1.9 million generated 242,773 calls for emergencies, which is 127.8 calls per one thousand population, per the 2014-2015 Miami-Dade Fire Rescue Business Plan.

2.2 RESULTS OF ANALYSIS

The proposed area meets two of three criteria (a and c) of Section 163.340(7) of the State Statutes.

SECTION 3 BLIGHT CONDITIONS

3.1 ANALYSIS OF BLIGHT CONDITIONS

The requirements under State Statutes 163.340(8) for designation as "Blighted" note that the area must have a substantial number of deteriorated, or deteriorating structures, in which conditions, as indicated by government-maintained statistics or other studies, are leading to economic distress or endanger life or property.

One method of illustrating "Blight" is through photographic evidence. Field observations were used to examine the area and photographs were taken of the conditions. Figures 3-1 through 3-14 are a representative sample of the conditions in the area. Other photographs are found in the Appendix.

The population also has a higher than average incidence of poverty with 32.3% of the population having household income levels below the Poverty Line.

Examples of "Unsafe Structures"



Figure 3-1 Single Family Home



Figure 3-2 Single Family Home

Examples of deteriorated buildings



Figure 3-3 Single Family Home



Figure 3-4 Single Family Home



Figure 3-5 Residential



Figure 3-6 Commercial



Figure 3-7 Commercial



Figure 3-8 Commercial

Examples of deteriorated structures



Figure 3-9 Roadways



Figure 3-10 Driveways



Figure 3-11 Sidewalks



Figure 3-12 Medians



Figure 3-13 Fences



Figure 3-14 Drainage

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The designation of deteriorated structures is not limited to buildings. Structures also include infrastructure elements such as roadways, sidewalks, drainage canals, fences, driveways and drainage aprons. An examination by Florida Technical Consultants, Inc. was undertaken as a part of this analysis. The examination considered the existence of deteriorated or substandard facilities as illustrated by the previous photographs. In addition, the examination also identified where these infrastructure facilities were absent. The following table represents the determination of the inadequate or missing structures in the proposed CRA area and possible costs associated with the improvements.

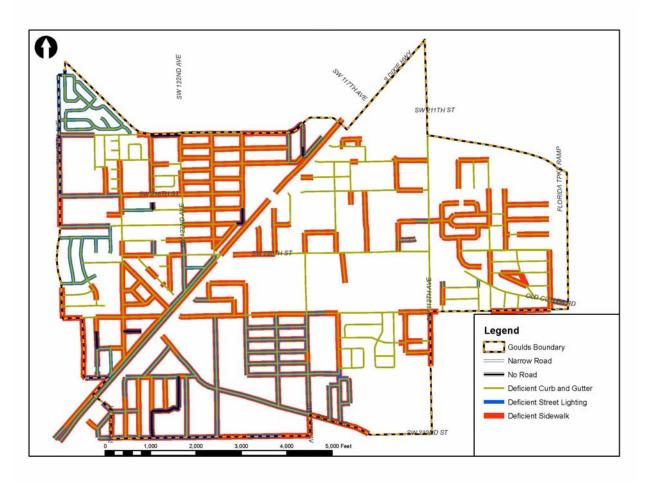
TABLE 3-1 INFRASTRUCTURE IMPROVEMENT NEEDS

Goulds CRA
Cost Estimate to Address Deficiencies

Item	Quantity	Unit	Cost	Total	
Install Sidewalk 1 Side	30164	SY	55	\$	1,659,044
Install Sidewalk 2 Side	104489	25000070	55	1000	5,746,889
Install Curb and Gutter	450090	LF	35	\$	15,753,150
Install Drainage	94734	LF	75	\$	7,105,050
Structures	868	EA	5000	\$	4,340,000
Install Sanitary Sewer	151252	LF	85	\$	12,856,420
Install Sanitary Sewer Structures	605	EA	4000	\$	2,420,000
Install Sanitary Sewer Features	8	EA	300000	\$	2,400,000
Install Water	71839	LF	250	\$	17,959,750
Install Lighting	170	EA	10000	\$	1,700,000
Roadway Restoration	500344	SY	60	\$	30,020,667
Design and Contingency 30%				\$	30,588,291
TOTAL IMPROVEMENTS				\$	132,549,261

Source: Florida Technical Consultants

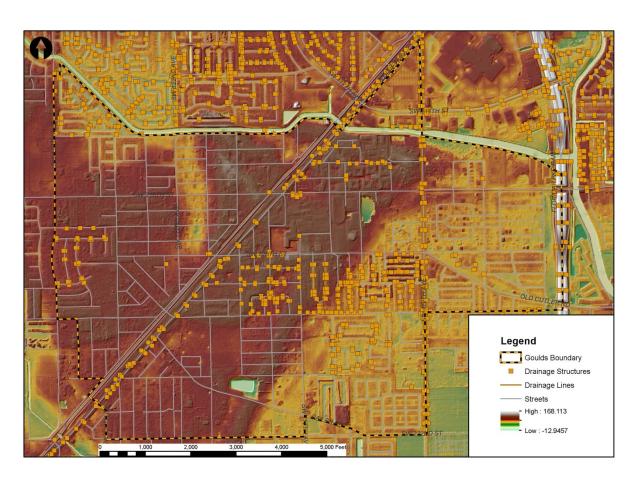
EXHIBIT 3-1 ROADWAY DEFICIENCIES



Source: Florida Technical Consultants

Exhibit 3-1 shows a map of the roadway deficiencies in the proposed CRA. This highlights the areas where the improvements detailed in Table 3-1 should be concentrated. The map on the following page shows the existing drainage structures in the proposed CRA (Exhibit 3-2).

EXHIBIT 3-2 DRAINAGE STRUCTURES



Source: Miami-Dade DERM, Florida Technical Consultants

3.2 Blight Criteria Analysis (Must meet 2 of the 14 items)

Each of the 14 criteria will be examined in this section.

(a) Predominance of defective or inadequate street layout, parking facilities, roadways, bridges, or public transportation facilities;

For economic purposes, the street layout should enable customers to reach businesses easily and for trade among business to be conducted directly and efficiently. Despite the fact that the major arterial roadway, Old Dixie Highway, cuts diagonally through the proposed CRA, most of the commercial property in the area is on major roadways and easily accessible. The street pattern of the proposed CRA is not detrimental to development of commercial property.

EXHIBIT 3-3 AERIAL PHOTOGRAPH OF STREET LAYOUT



Source: Miami-Dade County Property Appraiser

(b) Aggregate assessed values of real property in the area for ad valorem tax purposes have failed to show any appreciable increase over the 5 years prior to the finding of such conditions;

Data from the Miami-Dade County Property Appraiser's Office was obtained to examine the change in Taxable Value for the properties located in the proposed CRA area and compare them to the entire County's experience.

The following table lists the experience of the potential CRA area and the County from the years 2010 through 2015. In 2010, Miami-Dade County, as well as the rest of the country, was in the midst of the great recession and the significant decline in the real estate market. Recovery has occurred, and while real estate values have not yet approached pre-recession levels, growth has occurred in the past five years.

The Goulds area has seen growth in the past five years, but not at the same rate the recovery has come to the rest of Miami-Dade County. While the County has experienced a growth rate of 19.85% from 2010 to 2015, the Goulds area has had a growth rate of only 5.62%.

TABLE 3-2 CHANGE IN TAXABLE VALUES - POTENTIAL CRA AREA AND MIAMI-DADE COUNTY

Value	Potential CRA Area	Miami-Dade County
2010 Taxable Value	\$258,180,087	\$192,268,347,808
2015 Taxable Value	\$272,698,379	\$230,429,191,490
Rate of Change	5.62%	19.85%

Source: Miami-Dade County Property Appraiser

(c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;

The conditions that generate faulty street layout would also contribute to a faulty lot layout. As discussed in section (a), commercial lots in the proposed CRA are easily accessible via major roadways. In addition, the lots are of adequate size and usefulness, and are not a detriment to development.

(d) Unsanitary or unsafe conditions;

The Miami-Dade Building Code Division has determined that 12 buildings in the potential area are "Unsafe Structures" and have cited these properties for the condition of the buildings.

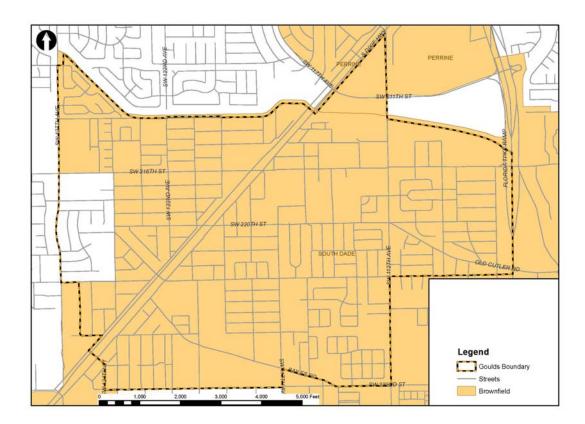
Ground contamination is a very serious issue throughout the potential area and much of the Goulds community has been designated as a Brownfield site. Brownfield status is a condition, within certain legal exclusions and additions, of real property, the redevelopment or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant, which may include petroleum hydrocarbon releases. Brownfield status generally means there are use or development restrictions on the site.

The primary goals of the Brownfield Redevelopment Act are to:

- Reduce public health and environmental hazards on existing commercial and industrial sites that are abandoned or underused due to these hazards
- Create financial and regulatory incentives to encourage voluntary cleanup and redevelopment of sites
- Derive cleanup target levels and a process for obtaining a "No Further Action" letter using Risk-Based Corrective Action principles
- Provide the opportunity for Environmental Equity and Justice

Most of the proposed CRA area is within the South Dade Brownfield area (as seen in beige in Exhibit 3-4).

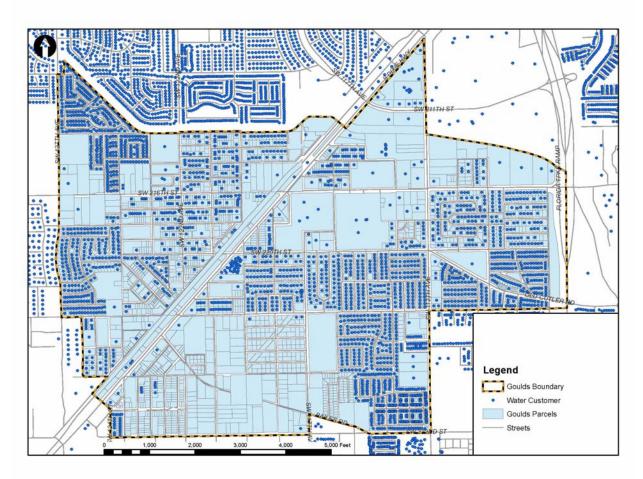
EXHIBIT 3-4 BROWNFIELD AREAS



Source: Miami-Dade County

The map on the following page is a visual representation of water customers in the proposed CRA area. Families without access to water service generally rely on well water. This can be problem in a Brownfield Area, or when sufficient safe-guards are in place to separate septic tanks and wells.

EXHIBIT 3-5 WATER CUSTOMERS



Source: Miami-Dade County Water and Sewer Department, Florida Technical Consultants, Inc.

(e) Deterioration of site or other improvements;

Listed in Table 3-1 (page 10) are the necessary improvements to the infrastructure within the potential area boundaries. These improvements total approximately \$132.5 million.

(f) Inadequate and outdated building density patterns;

Density patterns can be measured by the amount of developed acres of land or by the amount of population per acre. Miami-Dade County contains approximately 2,000 square miles of the land area. However, only approximately 500 acres are developed and within he Urban Development Boundary (UDB). Based on a population of approximately 2.5 million, the density of persons per acre in Miami-Dade County is 7.81.

In the potential CRA area, the population of 11,786 resides in a 1,533 acre area, for a density of 7.68 persons per acre. This is less dense than the County overall.

(g) Falling lease rates per square foot of office, commercial, or industrial space compared to the remainder of the county or municipality;

Lease rates have not been declining and are generally on a par with other similar areas of Miami-Dade County. Three data sources were used to determine the lease rates and the real estate activity in the area. These sources are:

- Trulia.com
- MLS
- Loop.net

Additionally, the information was verified through field investigation.

(h) Tax or special assessment delinquency exceeding the fair value of the land;

The Miami-Dade Tax Collectors Office is the source of the Tax Delinquency figures for the county and the potential area. Data representing the tax delinquencies for the past year were acquired and analyzed for this study.

One of the questions regarding the designation of blight is if the area has property with tax delinquencies that exceed the fair value of the properties within the boundary. The Tax Delinquencies for the potential area total \$928,814 as of May 2014. With a total Taxable Value of \$272,180,087, the Tax Delinquencies represent 0.34% of the total.

TABLE 3-3
TAX OR SPECIAL ASSESSMENT DELINQUENCY IN PROPOSED CRA AREA AND MIAMI-DADE COUNTY

Value	Delinquent Value	Taxable Value	Percent Delinquent
Proposed CRA Area	\$928,814	\$272,180,087	0.34%
Miami-Dade County	\$89,925,547	\$230,429,191,490	0.04%

Source: Miami-Dade County Tax Collector

(i) Residential and commercial vacancy rates higher in the area than in the remainder of the county or municipality;

There are relatively few vacancies in the potential area and these rates are not more extensive than through the remainder of Miami-Dade County. Three data sources were used to determine the vacancy rates and the Real Estate activity in the area. These sources are:

- Trulia.com
- MLS
- Loop.net

Additionally, the information was verified through field investigation.

(j) Incidence of crime in the area higher than in the remainder of the county or municipality;

Crime data was obtained from the Miami-Dade Police Department who maintain statistics for each Police Service Grid in the County. Data from the grids that encompass the potential CRA were obtained to determine the incidence of crime. Data was provided for "Emergency" calls and "Priority" calls which represent the most significant activity for the Department. Data from the most recent year available (2014) was used.

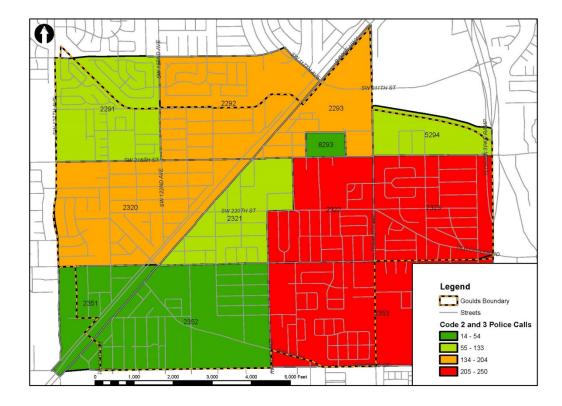
For the past year, the total number of Emergency and Priority calls for the potential CRA area was derived from the posted statistics. To better compare these numbers, they were divided by the population to arrive at a per capital figure of calls per one thousand population. Table 3-4 provides the analysis.

TABLE 3-4 POLICE CALLS PER CAPITA

Area	Police Calls	Population	Calls/1,000
Proposed Goulds CRA Area	1,645	11,786	139.6
Miami-Dade County Service Area	54,760	1,090,645	50.2

Source: Miami-Dade Police Department

EXHIBIT 3-6 POLICE EMERGENCY AND PRIORITY CALLS



Source: Miami-Dade Police Department

(k) Fire and emergency medical service calls to the area proportionately higher than in the remainder of the county or municipality;

A review of the data from the Miami-Dade Fire Rescue Department reveals that in 2014, the area had a total of 2,109 emergency calls. Based on the population of 11,786, this equates to 178.9 calls per one thousand population. For the entire service area of Miami-Dade Fire Rescue during the same time, the population of 1.9 million generated 242,773 calls for emergencies, which is 127.8 calls per one thousand population, per the 2014-2015 Miami-Dade Fire Rescue Business Plan.

(l) A greater number of violations of the Florida Building Code in the area than the number of violations recorded in the remainder of the county or municipality;

The Miami-Dade Code Enforcement Division is responsible for overseeing the monitoring and enforcement of the Building Codes and other State and County regulations regarding the use of property. Data for the past year was obtained and review to assess the number of Code violations within the potential CRA boundary and the total for the unincorporated area of Miami-Dade County.

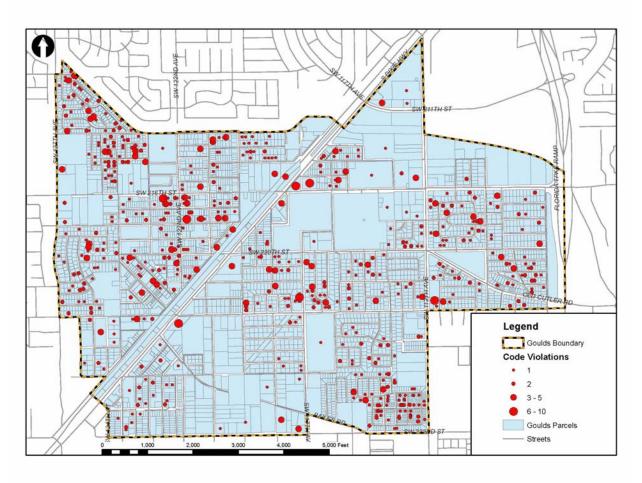
Table 3-5 lists the figures and analysis for the Code violations in the area. Exhibit 3-7 is a graphic representation of the number of violations in the area.

TABLE 3-5 CODE VIOLATIONS

Area	Violations	Parcels	Rate per 1,000 Parcels
Proposed CRA	940	3,674	255.85
Unincorporated County	92,846	1,109,204	83.71

Source: Miami-Dade Code Enforcement

EXHIBIT 3-7 CODE VIOLATIONS BY LOCATION



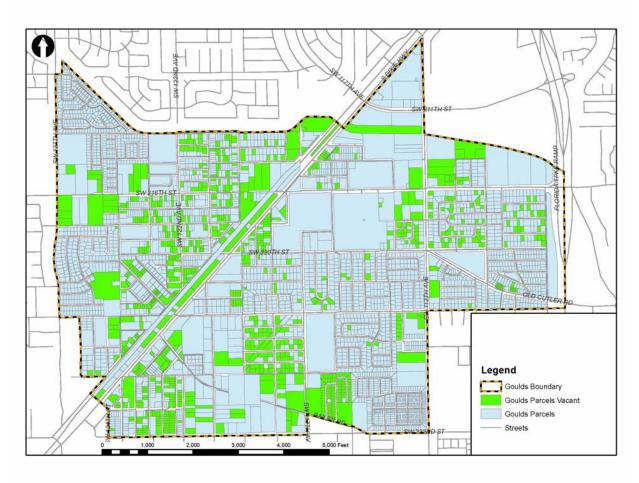
Source: Miami-Dade Building Department, Florida Technical Consultants

(m) Diversity of ownership or defective or unusual conditions of title which prevent the free alienability of land within the deteriorated or hazardous area,

The following map (Exhibit 3-8) illustrates the amount of vacant property within the potential area. A large amount of vacant property is often designated as a negative factor since the land is not productive. However, it may also be seen as a positive providing an opportunity to develop. Exhibit 3-8 indicates that there is a large amount of vacant property in the potential area.

Another factor in assessing the amount of vacant property is the diversity of the ownership. The best chance for development or redevelopment is if much of the area has common ownership. In several cases multiple ownership exists. Luxor 77 LLC, Mountain Cove Homes, Coral Dream Homes, Elijah David Dukes, among others, have multiple vacant lots in the proposed CRA, allowing for development.

EXHIBIT 3-8 VACANT PROPERTY



Source: Miami-Dade Property Appraiser, Florida Technical Consultants

(n) Governmentally owned property with adverse environmental conditions caused by a public or private entity,

A visual representation of government owned land is shown in Exhibit 3-9 on the following page. There is a significant amount property in government ownership in the potential area. Since the entire CRA area is within a Brownfields designation, the amount of land that is held by the government with environmental concerns is significant.

EXHIBIT 3-9 GOVERNMENT OWNED PROPERTY



Source: Miami-Dade Property Appraiser, Florida Technical Consultants

SECTION 4 PUBLIC INPUT

EXHIBIT 4-1 PUBLIC INPUT NOTICE

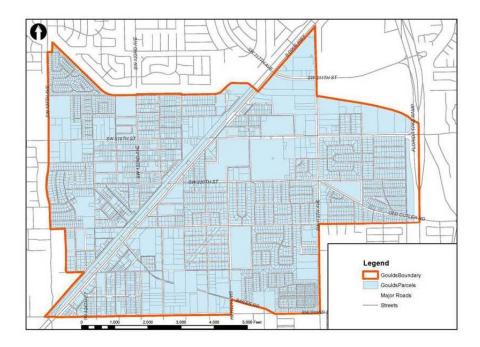
THE PUBLIC IS CORDIALLY INVITED TO ATTEND A PRESENTATION ON THE

Goulds Community Redevelopment Area Study

Date: Wednesday, December 2, 2015 Time: 6:30 – 8:00 PM

Location: Goulds Park 11350 SW 216 Street Miami, Florida 33170

The public is invited to attend a presentation on the initial findings of a study on the proposed Goulds Community Redevelopment area. The purpose of the meeting will be to discuss the area's current conditions, needed improvements and community standards. Attendees will have the opportunity to give feedback on the preliminary report and offer additional information relating to crime and safety, housing, transportation and economic development within the studied boundaries. This meeting is free and open to residents, property owners, business owners, and interested members of the general public.



Sponsored by Miami-Dade County in collaboration with PMG Associates, Inc. For further information call 786-258-1697

Finding of Necessity – Goulds

Goulds Public Meeting

December 2, 2015 Summary of Comments at Meeting

- County has not provided data when requested by the community
- Resident has septic tank and well
 - Was told by Miami-Dade that she did not have to hookup to County water if she did not want to
- County sends criminals to Goulds community.
- An old Cutler Bay/Goulds CRA was proposed but never enacted
- Slum and blight did not happen overnight, has been going on for 50 years
- County does not give specific data
- High unemployment and low tax base are not taken into account in report
- Brownfields have been discussed in community for years.
 - Apartments on Allapattah built on top of brownfield without fixing the condition first
- Apartment Complexes cause high density.
 - o Many areas of Goulds are dense
 - o The proposed CRA area as a whole is less dense than Miami-Dade
- An existing NRSA overlaps with some areas of the proposed CRA
- Naranja Lakes CRA created after Hurricane Andrew destroyed much of the area
 - o Built Mandarin Lakes
 - Hired security guards
- CRAs typically last 30 years
 - o Trend is to give ten years and extend if successful
- Communities with limited financial assets need to use all tools available to access money
- There are many failed projects on Old Cutler that could be rejuvenated
 - o Streetscaping could be paid for with CRA funds
- Three different charrettes have been done in the area
 - Need to promote the community
 - o Need African-American owned small businesses to keep money in the neighborhood
 - o Too many corner stores currently
- Combining CRA funds with CDBG funds give the CRA board more clout
- Victory Gardens neighborhood still floods
- CRA is opportunity to get teeth
 - o Has been planned for years
 - o Need to combine funds with planning and expertise
- 220th Street and 113th County fixed drainage issues but it is broken again now
 - o Trees inside drains
 - o Problem for 20 years

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Public Meeting Sign-in sheets

Data follows.

Public Meeting Sign-in sheets

Goulds CRA Finding of Necessity - Public Input Meeting December 2, 2015

Name	Organization	Telephone	E-mail
J. Ruen	Office of Comm mon	305-245-4420	I river o man gal
Ed Hanna		786298 693	+ + consulting
Carswell Washington		786298 6925 305-232-2841	Coni
	Citizens Athance of Groulds		
Millie Cole	Citizen of Goulds	486 266 1203	,
	7		

Goulds CRA Finding of Necessity - Public Input Meeting December 2, 2015

Name	Organization	Telephone	E-mail
Quinton Parrish		786-346-2699	OJParrish Dyghooco
Rev. Elnora Darling	CHL	786-339-9010	Noradii460 yahoo.co
Gladep Priscoe		I .	Mleethana F. Org
Philly Murray un	CITIZEN	30/257-1357	mueray thicipE) ATT, N
Ms Agna	Citizen		,
TAKela Chane	Citizen	786-975-6893	
Enid W. Deneps	Citizen	18 333-4137	end wash Dellsouth mi 1/demps@be//southing
JL Domps Je	The Granter Con Ids Optimist - Goodels Contitue of Ministers 3 cay prople	786-380-7716	I/demps abel/suthine;

SECTION 5 SUMMARY AND RECOMMENDATIONS

5.1 SUMMARY

Sections 2 and 3 of this report identify the criteria for designation as "slum" and "blight" based on Florida Statutes. Each of the criteria was examined individually to assess the conditions and determine if the requirements under State law has been satisfied. Tables 5-1 and 5-2 the criteria for slum and blight found in the potential area.

TABLE 5-1 SLUM CRITERIA

Criteria	Description	Finding
(a)	Inadequate provision for ventilation, light, air, sanitation, or	Meets criteria
	open spaces	
(b)	High density of population	Does not meet criteria
(b) (c)	High density of population The existence of conditions that endanger life or property by fire or other causes	

TABLE 5-2 BLIGHT CRITERIA

Criteria	Description	Finding
Deteriora	ted Strictures	Meets criteria
(a)	Predominance of defective or inadequate street layout	Does not meet criteria
(b)	Assessed values of real property in the area have failed to	Meets criteria
	show any appreciable increase	
(c)	Faulty lot layout	Does not meet criteria
(d)	Unsanitary or unsafe conditions	Meets criteria
(e)	Deterioration of site or other improvements	Meets criteria
(f)	Inadequate and outdated building density patterns	Does not meet criteria
(g)	Falling lease rates per square foot of office, commercial, or	Does not meet criteria
	industrial space	
(h)	Tax or special assessment delinquency exceeding the fair	Meets criteria
	value of the land	
(i)	Residential and commercial vacancy rates higher in the area than in the remainder of the county	Does not meet criteria
(j)	Incidence of crime in the area higher	Meets criteria
(k)	Fire and emergency medical service calls to the area	Meets criteria
	proportionately higher	
(l)	A greater number of violations of the Florida Building Code	Meets criteria
(m)	Diversity of ownership or defective/unusual conditions of	Does not meet criteria
	title	
(n)	Governmentally owned property with adverse environmental	Meets criteria
	conditions	

Finding of Necessity – Goulds

This summary notes that the potential area meets two of the three of the "Slum" criteria and 8 of the 14 specific "Blight" criteria. In addition, the potential area has a substantial number of deteriorated structures as evidenced by Figures 3-1 through 3-14 and the photographs found in the Appendix.

5.2 **RECOMMENDATIONS**

The potential CRA area of Goulds meets the criteria established under State Statutes to be designated as "slum" and "blight". The area meets two of the three criteria to be designated as slum (one is required), and eight of the criteria to be designated as "blight" (only two are required). The area also meets the "blight" requirement of existence of deteriorated structures.

It is recommended that the Board of County Commissioners approve the Finding of Necessity for the CRA boundaries as expressed in Exhibit 1-1.

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APPENDIX A PHOTOGRAPHS OF CONDITIONS

Deteriorated Housing













Broken Awnings







Driveways





