

Miami-Dade County Board of County Commissioners

Office of the Commission Auditor

Economic Prosperity Committee Meeting

January 19, 2017 2:00 P.M. Commission Chamber

Research Division

Office of the Commission Auditor 111 NW First Street, Suite 1030 Miami, Florida 33128 305-375-4354

Item No.	Research Notes
1G1	ORDINANCE RELATING TO THE INFILL HOUSING INITIATIVE PROGRAM; AMENDING ARTICLE
Sub.	VII OF CHAPTER 17 OF THE CODE OF MIAMI-DADE COUNTY, FLORIDA; AMENDING DEFINITIONS;
170060	REVISING DEFINITIONS OF LOW AND MODERATE INCOME HOUSEHOLDS AND ADDING
	DEFINITION FOR VERY LOW INCOME HOUSEHOLDS; DELETING REHABILITATED DWELLING
	UNITS FROM BEING ELIGIBLE UNDER THE PROGRAM; EXTENDING FROM ONE YEAR TO TWO
	YEARS THE TIME PERIOD FOR DEVELOPMENT OF INFILL HOUSING BY DEVELOPERS;
	ESTABLISHING CONDITIONS FOR CONSTRUCTION LOANS AND OTHER FINANCING; REVISING
	REQUIREMENTS UNDER WHICH HOMES CAN BE RENTED; UPDATING TERMINOLOGY;
	PROVIDING SEVERABILITY, INCLUSION IN THE CODE, AND AN EFFECTIVE DATE [SEE ORIGINAL
	ITEM UNDER FILE NO. 162604] [SEE AGENDA ITEM NO. 2A]
Notes	The proposed ordinance relating to the Infill Housing Initiative Program provides for the following:
	Amends Article VII of Chapter 17 of the Miami-Dade County Code;
	 Amends definitions of low and moderate income households; Low income household is defined as one or more natural persons or a family that has a total
	• Low income household is defined as one or more natural persons or a family that has a total annual gross household income that does not exceed 80 percent of the median annual income
	adjusted for family size for households within Miami-Dade County.
	 With respect to rental units, the low-income household's annual income at the time of
	initial occupancy may not exceed 80 percent of the area's median income adjusted for
	family size.
	• Moderate income household is defined as one or more natural persons or a family that has a
	total annual gross household income that does not exceed 140 percent of the median annual
	income adjusted for family size for households within Miami-Dade County.
	 With respect to rental units, the moderate-income household's annual income at the
	time of initial occupancy may not exceed 140 percent of the area's median income
	adjusted for family size.
	• Adds definition for very low income household ;
	• Very low income household is defined as one or more natural persons or a family that has a total
	annual gross household income that does not exceed 50 percent of the median annual income
	adjusted for family size for households within Miami-Dade County.
	 With respect to rental units, the very-low income household's annual income at the time of initial occupancy may not exceed 50 percent of the area's median income
	adjusted for family size.
	 Deletes rehabilitation dwelling units from being eligible under the program;
	 Extends from one year to two years the time period for development of infill housing by developers;
	 Contains a reverter to be exercised by the County in the event the property has not been
	reasonably developed within two years of conveyance. Any eligible infill housing that is
	developed under this Infill Housing Initiative Program will remain as affordable housing for at
	least 20 years.
	• Establishes conditions for construction loans and other financing; and
	 Construction loans or other financing will be subject to the County's deed restriction and will
	constitute a restrictive covenant which will run with the land.
	• Revises requirements under which homes can be rented.
	• The County Mayor or designee may allow developers to rent eligible homes on a temporary
	basis if the qualified developer can demonstrate that they have made a good faith effort to sell
	the eligible home.
	 Allows eligible homes to be rented to families who are eligible participants in one of the County's or other local municipality's rental housing assistance programs.
	 Eligible homes will be rented for a minimum of one year and will not be permitted to be sold
	during the first year it is rented, unless it is sold to the existing tenant.
	This item differs from the original in that it requires that after two years from the date of conveyance of the
	properties to developers, any request for extensions to complete the homes constructed by the developers will be
	approved by the BCC instead of the County Mayor or the County Mayor's designee. Additionally, this item
	clarifies that where necessary to secure permanent financing through the Federal Housing Administration, Fannie

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	Mae, Freddie Mac or similar lender, the County's affordable housing restrictions automatically terminate upon foreclosure or deed in-lieu of foreclosure or if the mortgage is assigned to the United States Department of Housing and Urban Development.
	The area median income for Miami-Dade County is \$48,100. ¹
	Additional Information- Mayor's Report Addressing Infill Housing Initiative Program The Mayor's report dated November 15, 2015- Report Addressing Infill Housing Initiative Program, in response to the directive given by the BCC, provided for the following:
	The Code of Miami-Dade County (County Code), specifically Article VII, Section 17-121 through 17-128.1, addresses the Program, covering purpose, definitions, acquisitions, transfer or sale of property, eligible households, affordability controls, development, rental property, forgiveness of County liens, and policies, etc. In addition to the County Code, the Program is also governed by Florida State Statutes, Sections 125.379 and 125.38, Implementing Order 3-44, the Infill Housing Developer County Contract and the Program Guidelines.
	The purpose of the Program is to increase the availability of affordable homes for very low, low and moderate- income persons; maintain a stock of affordable housing; redevelop urban neighborhoods by eliminating blight of vacant lots and dilapidated or abandoned properties; equitably distribute homeownership opportunities within the Infill Target Areas; and generate payment of ad valorem taxes. The Program encourages the redevelopment of vacant property through the sale or transfer of County property to qualified developers who are required to build affordable single-family homes to be sold to income eligible households. The Program provides incentives to encourage qualified developers to build affordable housing within the Infill Target Areas such as conveyance of land for \$10.00, forgiveness of County liens and citations on private lots, refund of impact fees, and assistance in the form of second mortgages for qualified buyers.
	According to the report, from 2002 through November 2011, the Program was administered by the Internal Services Department, which had four (4) full-time staff, a supervisor, and two (2) part-time County employees for Program administration. Since November 1, 2011, the Program has been administered by the Public Housing and Community Development Department (Department). There is currently one (1) full-time staff person dedicated to administering the Program. The Department plans to request two (2) additional full-time Real Estate Officers to better administer the Program.
	 However, the Fiscal Impact Statement attached to the proposed item states that no additional staff is anticipated and expenses associated with the proposed ordinance are part of the FY2016-17 Adopted Budget. Therefore, the implementation of the proposed ordinance will not have a fiscal impact. According to the Department, they still intend to hire two (2) additional full-time positions to better administer the Program. <i>Will the fiscal impact statement be amended to reflect that?</i>
	Since the Program's inception in 2002, there have been 777 affordable homes built and sold. There are 14 homes currently under construction and 149 parcels which are pending development have been conveyed to developers. In addition, pursuant to Florida Statute 9, Section 17-128.1, an annual report is submitted to the BCC that includes the following information: List of lots made available and conveyed to qualified developers; Number of homes built and sold to qualified households; Amount of liens released on County and private property developed for the Program; and Legal actions taken against violators.
2A 162605	RESOLUTION AMENDING IMPLEMENTING ORDER NO. 3-44 RELATED TO THE ADMINISTRATION OF THE MIAMI-DADE COUNTY INFILL HOUSING INITIATIVE PROGRAM; REVISING DEFINITIONS; ESTABLISHING PROCEDURES, PROGRAM FEES AND REPORTING REQUIREMENTS FOR THE ADMINISTRATION OF THE PROGRAM; APPROVING INFILL HOUSING INITIATIVE PROGRAM GUIDELINES; AND AUTHORIZING THE COUNTY MAYOR OR THE COUNTY MAYOR'S DESIGNEE TO EXERCISE ALL RIGHTS CONTAINED IN IMPLEMENTING ORDER NO. 3-44 AND THE INFILL

¹ <u>http://www.miamidade.gov/housing/income-limits.asp</u>

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	HOUSING INITIATIVE PROGRAM GUIDELINES AND TO AMEND SUCH GUIDELINES FROM TIME TO TIME [SEE AGENDA ITEM NO. 1G1 SUBSTITUTE]
Notes	The proposed resolution provides for the following:
	• Amends Implementing Order No. 3-44 related to the administration of the Miami-Dade County Infill
	Housing Initiative Program;
	Approves the Infill Housing Initiative Program Guidelines;
	• Authorizes the County Mayor or designee to exercise any and all rights contained in Implementing Order No. 3-44 and the Infill Housing Initiative Program Guidelines; and
	• Authorizes the County Mayor or designee to amend the Infill Housing Initiative Program Guidelines,
	from time to time, provided that the amendments are not in conflict with the Code and Implementing
	Order No. 3-44.
2B	RESOLUTION DIRECTING COUNTY MAYOR OR COUNTY MAYOR'S DESIGNEE TO ADVERTISE
170041	REQUESTS FOR PROPOSALS AND REQUESTS FOR QUALIFICATIONS ON MIAMI-DADE TV
Notes	The proposed resolution directs the County Mayor or designee to advertise all requests for proposals and requests for qualifications on Miami-Dade TV so that these solicitations reach the broadest market of vendors for the
	procurement of County goods and services.
	production of County goods and services.
	Background
	Miami-Dade TV is the County's government access television station, carried by all cable TV systems in Miami-
	Dade County that provides public information programming 24 hours a day, 7 days a week such as live coverage
	of meetings of the BCC and its committees, as well as a wide variety of informational and educational
	programming about government programs and services, public safety, arts & culture and the environment. Miami-
	Dade TV encourages County departments to provide coverage of their services, events and other newsworthy stories to provide the public with important information about government services and opportunities.
	Additionally, Miami-Dade TV is streamed online on the Miami-Dade TV YouTube Channel and shared via social
	media channels to a wide range of County residents, businesses and professionals.
3A	RESOLUTION DECLARING AND FINDING, PURSUANT TO SECTION 163.355, FLORIDA STATUTES,
162929	CERTAIN GEOGRAPHIC AREA OF CITY OF HIALEAH, FLORIDA DESCRIBED GENERALLY AS
	BOUNDED ON THE NORTH BY HIALEAH DRIVE (NW 54 STREET), ON THE SOUTH BY STATE ROAD
	112, ON THE EAST BY THE CSX RAILROAD TRACKS AND ON THE WEST BY SE 9 COURT
	NORTHWARD TO SE 5 STREET, THEREAFTER SE 10 AVENUE TO BE A BLIGHTED AREA; DECLARING AND ENDING THE REPUT DING. BEHARD ITATION, CONSERVATION AND
	DECLARING AND FINDING THE REBUILDING, REHABILITATION, CONSERVATION AND REDEVELOPMENT OF THE AREA TO BE IN THE INTEREST OF THE PUBLIC HEALTH, SAFETY,
	MORALS AND WELFARE OF RESIDENTS OF CITY OF HIALEAH AND OF MIAMI-DADE COUNTY,
	FLORIDA; DECLARING AND FINDING THE NEED FOR CREATION OF COMMUNITY
	REDEVELOPMENT AGENCY; AND DELEGATING CERTAIN COMMUNITY REDEVELOPMENT
	POWERS TO THE CITY OF HIALEAH
Notes	The proposed resolution provides for the following:
	• Accepts the Finding of Necessity (Study) and finds a geographic area within the City of Hialeah (City),
	bounded on the north by Hialeah Drive (NW 54 Street), on the south by State Road 112, on the east by the CSV reilread tracks and on the west by SE 0 Court parthward to SE 5 Street thereafter SE 10
	the CSX railroad tracks and on the west by SE 9 Court northward to SE 5 Street, thereafter SE 10 Avenue (Area), which is described more fully in the Study and referred to as the Hialeah Market Station
	District to be blighted, pursuant to Chapter 163, Part III, Florida Statutes (Act);
	• The Study identifies approximately 121 acres within the unincorporated municipal service area
	(UMSA). There are 41 properties in the area, of which 29 are zoned industrial, 10 are zoned
	commercial and two (2) are zoned vacant.
	• Declares and finds that the rebuilding, rehabilitation, conservation and redevelopment of the Hialeah
	Market Station District is necessary in the interest of the public health, safety, morals and welfare of the
	residents of Miami-Dade County as a whole;
	• Declares and finds that the Hialeah Market Station District is a slum or blighted area, as defined in Section 162,240 of the Act, or amplied to Miami Dada Country
	Section 163.340 of the Act, as applied to Miami-Dade County;
	 Declares and finds that there is a need for a community redevelopment agency to function and carry out the community redevelopment purposes of the Act; and
	the community redevelopment purposes of the Act, and

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	Delegates certain redevelopment powers to the City to create the Hialeah Market Station District
	Community Redevelopment Agency (Agency) and prepare a community redevelopment plan to present
	to the BCC after approval, notice and public hearing, but reserves the right to delegate further powers to
	the Agency, pursuant to an interlocal cooperation agreement.
	Should this item be approved, a legislative item will be presented to the BCC, along with a redevelopment plan
	and interlocal agreement with the City.
	The Tax Increment Financing and Coordinating Committee reviewed the Study on February 24, 2016 and
	recommended the BCC adopt the Study.
	Fiscal Impact / Funding Source
	A community redevelopment agency's revenue source is generated through the incremental growth of ad valorem
	revenues generated on real property beyond an established base year, Tax Increment Financing (TIF). As provided
	in the Study, should this area become a community redevelopment agency, the countywide and City revenues will
	be deposited into a trust fund and will be used within the redevelopment area to fund projects that will eradicate
	the blight in the community pursuant to the redevelopment plan.
	Developed 20 sector TIE sector in the interval sector is the theory of the Court is finance
	Based on a 30-year TIF revenue projection, including a roll growth consistent with the County's five-year outlook, it is estimated that the countywide TIF revenue generated will be \$6.5 million and the City TIF revenue
	generated will be \$8.8 million. The projection does not include any new projects in the area. The City has been
	approached by the owner of twenty (20) acres who is interested in redeveloping the property, Phase One will
	include 610 workforce housing rental units, approximately 23,000 square feet of retail, and 21,000 square feet of
	flex space and amenities. Should this project be developed in the area, the estimated TIF revenue generated for
	use within the boundaries would increase. The area also includes the Hialeah Market Tri-Rail station, which is
	inclusive of a historic Seaboard Air Line Railroad depot.
	Background On October 13, 2015, the City adopted Resolution No. 2015-136, adopting the Finding of Necessity and
	Resolution No. R-2015-137, creating the "Hialeah Market District Community Redevelopment Agency" and
	declaring the City Council as members of the Agency. Subsequently, the City met with the County to discuss the
	request to create a community redevelopment agency. On January 12, 2016, the City adopted Resolution No.
	2015-141, urging the BCC to adopt the Study and delegate the powers authorized under the Act. Additionally, on
	January 12, 2016, the City also adopted Resolution No. 2016-06, amending the boundaries of the Study to include
	the rights-of-way and the CSX railway facility. The Study, prepared by Carras Community Investment, Inc.
	(Carras), examined the conditions in the proposed redevelopment area and concluded that the area meets 14
	conditions of blight as follows:
	• Predominance of defective or inadequate street layout, parking facilities, roadways, bridges or public
	transportation facilities;
	• Aggregate assessed values of real property in the area for ad valorem tax purposes have failed to show any appreciable increase over the five (5) years;
	 Faulty lot layout;
	 Unsanitary or unsafe conditions;
	 Deterioration of site or other improvements;
	 Inadequate and outdated building density patterns;
	 Falling lease rates;
	 Tax or special assessment delinquency;
	 Higher commercial vacancy rates in the area;
	 Incidence of crime in the area higher than in the remainder of the county or municipality;
	 Fire and emergency medical service calls to the area are proportionately higher;
	• A greater number of code violations in the area;
	• Diversity of ownership; and
	Governmentally-owned property with adverse environmental conditions.

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3B 162958	RESOLUTION APPROVING GRANT AGREEMENT BETWEEN CCRE MEEK, LLC AND MIAMI-DADE COUNTY RELATING TO GRANT IN AMOUNT OF \$5 MILLION FROM PROJECT NO. 124 ECONOMIC DEVELOPMENT FUND OF BUILDING BETTER COMMUNITIES GENERAL OBLIGATION BOND PROGRAM; AND AUTHORIZING COUNTY MAYOR OR COUNTY MAYOR'S DESIGNEE TO EXECUTE AND DELIVER GRANT AGREEMENT ON BEHALF OF COUNTY
Notes	The proposed resolution approves a Grant Agreement (Agreement) with CCRE Meek, LLC (Grantee), which is associated with a previously approved allocation by this BCC in the amount of \$5 million from Building Better Communities General Obligation Bond (BBC-GOB) Program Project No. 124 Economic Development Fund (Project No. 124) for the partial funding of certain public infrastructure improvements related to the completion of Carrie Meek International Business Park (GOB Project).
	Approval of this Agreement will fund certain public infrastructure improvements in connection with the construction of a single large bay distribution and warehouse building of a minimum 800,000 square feet (Distribution Project). The Distribution Project is expected to be completed by the end of 2018 at a cost of approximately \$92 million.
	The total anticipated cost of the public infrastructure is projected at \$5 million. The Grantee will be responsible for the total project costs not covered under the Agreement. The Grantee will also be responsible for the management of the overall GOB Project.
	The Grantee has agreed to create or cause to be created a minimum of 1,000 new full-time permanent jobs, 500 of which will be at an average annual wage of \$24,017.76 (County's Living Wage) or higher.
	<u>Fiscal Impact/Funding Source</u> The Agreement provides that \$5 million from BBC-GOB Program Project No. 124 will be made available to the Grantee on a reimbursable basis for costs related to the GOB Project. The funding source for the Agreement is BBC-GOB Program bond proceeds.
	The County anticipates reimbursement funding under the Agreement to be made available in FY 2018-19. The Agreement will partially offset the cost of water and sewer improvements, sewer lift station construction and/or improvements, roadway improvements, traffic signals and signage, sidewalks, street lights, pavement markers, underground utilities, public parking and other eligible infrastructure.
	 Background Pursuant to Resolution No. R-986-14 adopted on November 5, 2014, the BCC approved a \$5 million allocation from BBC-GOB Program Project No. 124 for the GOB Project and directed the County Mayor or County Mayor's designee to begin negotiating the terms of an agreement. A draft agreement document with standard terms under the BBC-GOB Program was sent to the Grantee and subsequent negotiations took place. As a result of the negotiation meetings with multiple potential grantees for BBC-GOB Program funding under Project No. 124, the Department recommended allowing the following change for all projects to be negotiated, which are incorporated into the Agreement: Payment of Grant – allowing for the division of the reimbursements into five (5) consecutive, equal payments – the first at 365 days following the Certificate of Occupancy (Initial Disbursement) and one (1) payment at each of the subsequent four (4) anniversaries of the Initial Disbursement. This would be in lieu of a onetime reimbursement in full at the Initial Disbursement with an irrevocable letter of credit (or other similar collateral) for the full amount thereof to be kept in place for the following four (4) years. To the extent that in any of those following four (4) years the Grantee fails to meet its employment requirements, then a deduction will be made at the time of each annual payment for any percentage of uncertified employment in an amount commensurate with the percentage of uncertified employment. For instance, if only 80 percent of the employment requirement is certified, then that year's payment will be reduced by 20 percent.
	Reimbursement to the Grantee of Eligible Capital Costs incurred by the Grantee for the construction of the GOB Project in five (5) equal payments beginning on a date that is no earlier than 365 days from the date the Distribution Project is put into service will satisfy both the Federal reimbursement requirements, as well as the

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	County's policy of certifying to there being a minimum of 1,000 new, fulltime, permanent jobs at the Distribution Project for five (5) years. Pursuant to the Agreement, all reimbursements to the Grantee will be in accordance with the Administrative Rules.
	Deviation(s) from the Allocation Memo accompanied by Resolution No. R-986-14: For the BCC's reference, below are terms or matters that deviate from the original resolution approving the
	allocation:
	 The Grantee has changed the scope of the Distribution Project. Originally planned as the construction of an industrial park with aviation and non-aviation components totaling 1.75 million square feet of space over a five (5) year period, it was to be comprised of nine (9) large bay distribution and warehouse buildings totaling 1.4 million square feet, and four (4) small bay business incubator buildings with a total of 175,000 square feet and seven (7) aviation use hangar buildings with a total of 170,000 square feet. The Grantee is now proposing to construct a four (4) phase project with a first phase to include a single large bay distribution and warehouse building of a minimum 885,000 square feet. The second and third phase will be additional distribution and warehouse space and a fourth building will be the Carrie Meek Building, comprising approximately 5,000 square feet of office space for the Carrie Meek Foundation. <i>It should be noted that the GOB Project will be utilized for infrastructure improvements required for Phase</i>
	 I. The Grantee has changed the projected number of new, permanent jobs from 2,300 to 1,000. The Grantee is responsible for the creation of 1,000 new jobs at the Distribution Project (Certified New Jobs). Of these 1,000 new jobs, 500 of them will be Certified Qualifying Wage Jobs of which will have an average annual salary ranging from \$27,499.68 to \$24,017.00 depending on whether or not the computation is with or without benefits. The new average salary exceeds the County's Living Wage for October 2016 through September 2017.
	 The Grantee will aspire to cause at least 700 Certified New Jobs at the Distribution Project to be available to qualified residents of Miami-Dade County. The Grantee will have satisfied this requirement by holding a minimum of two (2) job fairs to recruit Miami-Dade County residents and such employment opportunities are to be advertised at least twice in a local publication or other media intended to recruit residents of Miami-Dade County.
	 The Grantee has changed the projected project cost from \$127.4 million, including \$14.4 million of public infrastructure work to a projected cost of \$92 million including public infrastructure of \$5 million. The County and Grantee have acknowledged and agreed that with respect to the Administrative Rules, Exhibits B, C, E, F, G, I and J of said Administrative Rules do not apply to this Agreement as the reimbursement request will be made in five (5) consecutive, equal payments after the Certificates of Occupancy and/or Completion for the Distribution Project have been issued and the jobs have been certified for at least 365 days.
	 Section 10 – Access to the Distribution Project and Section 11 – Confidentiality, Non-Disclosure and Declaratory Judgment have been added to this Agreement at the request of the Grantee to protect their tenant from the release of Trade Secret Information.
	Additional Information The Office of the Inspector General (OIG) Memo dated January 17, 2017 provides the OIG Observations,
	Comments and Recommendations on the Grant Agreement between CCRE Meek, LLC and Miami-Dade County for the Carrie Meek International Business Park. Listed below are highlights from the Memo:
	• The final negotiated agreement deviates from the Distribution Project's initial terms as approved by the BCC. The Distribution Project's physical size and its intended business uses have changed. Important to the purpose behind the Economic Development Fund (EDF) incentives, the number of new jobs and the wages associated with these new jobs have changed too. The new terms, presented in the instant agreement, represent significant reductions.
	The OIG's memorandum contains four (4) issues, resulting in eight (8) recommendations, for the BCC's consideration. These four (4) issues are:
	 Eliminate two-tiered "new jobs" certification – in other words, have only one classification of

1. Eliminate two-tiered "new jobs" certification – in other words, have only one classification of qualifying "new jobs";

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	• The initial grant application, which was approved by the BCC, required the Grantee to create 2,300 new full-time jobs with an average annual salary of \$37,000. At present, the Grantee will only have to create 1,000 new jobs. Half of those new jobs (500) will be certified as having an annual average salary of \$27,499.68 (without benefits) or \$24,017.76 (including benefits).
	 As proposed, the minimum number of new jobs to be created is reduced by 56 percent (2,300 new jobs to 1,000 new jobs) and 78 percent (2,300 to 500 new qualifying wage jobs), depending if they are "qualifying wage" jobs. Moreover, the minimum average salary for only 500 new jobs is 26 percent less (from \$37,000 to \$27,499) than what was offered previously to all 2,300 employees.
	2. Link the grant agreement's average annual wage threshold to annual changes in the County's
	Living Wage and require the hourly wage rate to be the County's Living Wage rate;
	• Based on the BCC's discussions over the last two years regarding the end goal that these Economic Development Funds are intended to achieve, we believe that the intent is not only to create new jobs but new jobs that pay good wages. We recommend that the certified new jobs be paid at the County's Living Wage rate (for service contracts) or more.
	3. Revise definition of "new jobs" to be consistent with other grant agreements to exclude relocation of jobs within Miami-Dade County; and
	• The OIG recommends that the definition of new jobs be revised to eliminate the clause "to the Distribution Project or"
	4. Increase target area employment opportunities.
	 To this end, we recommend that a portion of the 700 new jobs for Miami-Dade County residents, be specially made available to the residents of the Opa-Locka TUA and Central and North-Dade Empowerment Zones.
	OIG Recommendations for the BCC's consideration:
	<u>Recommendation 1-</u> For the proposed CCRE grant, we suggest that the BCC require that all 1,000 newly created jobs be certified at the average annual salary rate or hourly rate (<i>see OIG Issue 2</i>). We also suggest that the singular new jobs certification be adhered to with the remaining proposed grants.
	<u>Recommendation 2-</u> Likewise, we suggest that this policy be adhered to with the remaining proposed grants.
	<u>Recommendation 3-</u> We believe that this is a reasonable requirement, especially if the number of Qualifying Wage Jobs stays at 500. This will ensure that a sizeable portion of the new jobs will be good jobs that pay living wages.
	Recommendation 4- As presently proposed, the annual average salary threshold stays the same through all five (5) years. Of course, it would be most desirable to have all the Certified New Jobs (at whatever number that might be) all paid at the County's Living Wage, as modified annually.
	<u>Recommendation 5-</u> The OIG recommends that the definition of new jobs be revised to eliminate the clause "to the Distribution Project or" Doing so, would ensure that the new jobs to be created are actually new to Miami-Dade County, and not merely jobs relocated from one part of the County to another part of the County.
	<u>Recommendation 6-</u> We also recommend that the job fair requirement be amended to include holding at least one job fair in Opa-Locka and actively engaging the participation and services of Career Source of South Florida, the Carrie Meek Foundation or other similar County-funded job placement agency to assist with recruitment and screening efforts.
	Recommendation 7- Achieving these goals could also include a requirement that employment outreach be performed beyond the "initial hiring activities for the opening of the Distribution Project." As it reads now, the Grantee will have met its obligations after the Distribution Project is open for business and the aforementioned job

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	fairs and advertisements were completed. There will be job turnover and, as additional hiring is needed, we recommend that the County include requirements that direct the Distribution Project's employer to utilize the services of Career Source of South Florida, the Carrie Meek Foundation or other similar County-funded job placement agency.
	Recommendation 8- Such a collaboration would ensure maximum exposure and benefit to the residents of Opa-Locka and the surrounding empowerment zones, while saving the employer the initial expense for recruitment advertising and applicant screening. Obviously, the Distribution Project's employer would be the final hiring authority.