

Memorandum



Date: April 28, 2026

Agenda Item No. 2(B)(1)
June 2, 2026

To: Honorable Chairman Anthony Rodriguez
and Members, Board of County Commissioners

From: Daniella Levine Cava *Daniella Levine Cava*
Mayor

Subject: Status Report Arthur Mays Villas, Naranja, Modello II, and Pine Island Public Housing Developments – Directive 252178, and Kline Nunn, Little River Plaza, and Little River Terrace Public Housing Developments – Directive 252225

Executive Summary

This report is in response to Resolution Nos. R-1120-25 and R-1121-25, both of which were adopted by the Board of County Commissioners (Board) on November 18, 2025 and sponsored by Commissioner Kionne L. McGhee and Commissioner Marleine Bastien respectively. Both resolutions directed the County Mayor or County Mayor's designee to, among other things, seek the United States Department of Housing and Urban Development's (HUD) consent to dispose of certain public housing properties without a competitive process.

Resolution No. R-1120-25 directed the County Mayor or County Mayor's designee, subject to certain conditions, to negotiate a lease and development agreement with SG South Miami-Dade Ventures, LLC (SG) for the redevelopment of Arthur Mays Villas, Naranja, Modello II, and Pine Island public housing developments. Further, pursuant to Resolution No. R-1121-25, the County Mayor or County Mayor's designee was directed, subject to certain conditions, to negotiate a similar agreement with PCSH Little River Development, LLC (PCSH) for the redevelopment of Kline Nunn, Little River Plaza, and Little River Terrace public housing developments. Both resolutions required the County Mayor or County Mayor's designee to seek the United States Department of Housing and Urban Development's consent to award development rights to SG and PCSH without a competitive process.

Upon the adoption of the resolutions, Department of Housing and Community Development (Department) staff, as required by the Board's directive, performed certain due diligence activities, initiated community engagement activities, including resident meetings to introduce the developer's proposed redevelopment plan, and commenced negotiations with SG and PCSH. In January of 2026, Department staff sought HUD's consent to dispose of and/or amend any existing disposition of the properties described in Resolution Nos. R-1120-25 and R-1121-25 without a competitive process. However, on March 13, 2026, HUD issued a formal written determination denying the County's joint request. A copy of HUD's determination is attached hereto. In light of HUD's determination, the County is unable to proceed with the direct award of development rights as contemplated in the resolutions.

Background

The County is the recipient of a \$15,000,000.00 grant agreement (Grant No. 22SRP43, effective December 1, 2023) between Miami-Dade County and the State of Florida, Department of Environmental Protection (FDEP) (The Grant), for the Miami-Dade County Little River Public Housing Resiliency Upgrades Project. The agreement was executed pursuant to Resolution No. R-1160-22, which retroactively approved the County Mayor or County Mayor's designee's actions in applying for grant funds under the Florida Department of Environmental Protection's Fiscal Year 2021 Resilient Florida Grant Program as part of a portfolio-wide application for resilience projects across the County.

The Grant addresses the redevelopment of three aging public housing sites in District 2: Kline Nunn (8300 N. Miami Ave., Miami, FL 33150), Little River Plaza (8255 NW Miami Ct., Miami, FL 33150), and Little River Terrace (8351 NW 5th Pl., Miami, FL 33150), and accounts for the redevelopment and replacement of 232 public housing units, including elderly housing. These three (3) aging public housing sites in the

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Little River area were constructed under outdated building standards and are increasingly constrained by diminishing capital funding, limiting the ability to address long-term rehabilitation and modernization needs. The sites are located within a low-lying coastal area near Biscayne Bay that is highly vulnerable to flooding and sea level rise, where recurring impacts from heavy rainfall and king tide events routinely overwhelm drainage systems, contributing to roadway flooding, property damage, and infrastructure stress. The Grant supports comprehensive resiliency and flood mitigation improvements designed to address these conditions, including resilient building upgrades, drainage system enhancements, green infrastructure installations, stormwater management capacity improvements, and supplemental canal bank adaptation measures intended to reduce flooding and sea level rise impacts and strengthen long-term environmental and housing resilience.

As part of the Department's due diligence review in connection with Resolution No. R-1121-25, staff sought guidance from FDEP regarding whether grant funds could be passed through to PCSH and whether subcontracted work would require a competitive procurement process. In response, FDEP advised that the County may delegate responsibility for competitive procurement of subcontractors to PCSH.

Further, on January 5, 2026, the Department's staff sought HUD's consent to dispose of and/or amend any existing disposition of the properties described in Resolution Nos. R-1120-25 and R-1121-25 without a competitive process. The request was sent to the Acting Director of the Office of Public Housing in the Miami Field Office of HUD, requesting HUD's consent to proceed without a competitive process. On March 13, 2026, the Acting Director issued a formal written determination denying the County's joint request. A copy of HUD's determination is attached hereto.

Conclusion

In light of HUD's denial, an impediment exists that prevents the County from further negotiating the lease and development agreements with SG and PCSH without a competitive process. Accordingly, it is recommended to initiate a competitive process which will directly resolve the HUD denial, satisfy federal procurement requirements, and preserve the due diligence, financial analysis, draft agreement terms, and community benefit frameworks developed to date as baseline requirements for the solicitations.

This memorandum will be placed on the next available Board meeting agenda, without committee review, pursuant to Rule 5.06(j) of the Board's Rules of Procedure. Should you require additional information, please contact Nathan Kogan, AICP, Director, HCD at 786-469-4106.

Attachment

- c. Geri Bonzon-Keenan, County Attorney
Jess McCarty, Executive Assistant County Attorney
Office of the Mayor Senior Staff
Nathan Kogan, Director, HCD
Adeyinka Majekodunmi, Commission Auditor
Christina Cicilia, Director, Office of Policy and Budgetary Affairs
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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Region IV, Miami Field Office
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Miami, FL 33131-3042

OFFICE OF PUBLIC HOUSING

March 13, 2026

VIA ELECTRONIC MAIL

Nathan Kogon
Executive Director
Miami Dade Housing and Community Development
701 NW 1st Court
Miami, FL 33136
Nathan.Kogon@miamidade.gov

Dear Mr. Kogon,

Thank you for the time and effort the Miami Dade Housing and Community Development team invested in your January 5, 2026, request to HUD on behalf of your Board of County Commissioners. The request seeks HUD's consent/approval to noncompetitively award multiple development contracts and to dispose of and/or amend existing disposition approvals for conveyance of former Public Housing properties without a solicitation process. This initial request, along with supporting documentation provided on February 13, 2026, was reviewed and considered.

After careful consideration, we are unable to approve your request. The decision was made following a thorough evaluation in accordance with applicable laws, regulations, and HUD policies. While we understand this may be disappointing, please know that our determination was reached only after thoughtful review and risk assessment which included but was not limited to a conflict of interest, concerns regarding transparency, accountability, and fairness, and lastly, multiple potential noncompliance issues that could expose your agency to audit findings, questioned costs, or other enforcement actions.

We wanted to acknowledge that although your request was submitted prior to the publication of the new [PHA Procurement Handbook 7460.8 REV 3](#), our review was conducted in accordance with the new PHA Procurement Handbook. The latest PHA Procurement Handbook publication consists of new and more detailed guidance on required and recommended procurement practices for PHAs. Moreover, unlike the previous version that cites outdated HUD procurement rules, the new PHA Procurement Handbook was updated to include references to the Uniform Administrative Requirements at [2 CFR Part 200](#). We recommend that all PHAs conduct a thorough review of the new PHA Procurement Handbook for future procurement actions to ensure consistency with newly established procurement requirements.

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Federal procurement rules by design are structured to ensure that taxpayer dollars are expended in a manner that provides full, fair, and open competition. We understand that while local practices may authorize PHAs to execute contracts noncompetitively or allow PHAs to convey excess property without competitive solicitation, federal procurement rules prevail. Specifically, when the federal rules are more stringent, the Federal rules preempt state and local authorities as applied to public funds.

As an important reminder, PHA board members must discharge their fiduciary duties impartially to ensure fair competitive access to procurement opportunities by responsible contractors. Board members must also conduct themselves in a manner that fosters the public's confidence in the integrity of the PHA procurement organization and process. This includes but is not limited to participation in the selection, award or administration of a contract supported by a federal award if they have a real or apparent conflict of interest. Furthermore, the Department broadly construes its conflict of interest rules to include any direct or indirect interest, financial or non-financial in nature. For additional information, [Lead the Way Quick Reference – Ethics](#), includes an excellent summary overview of the Department's conflict of interest rules and the [PHA Procurement Handbook, REV 3, Chapter 4 - Ethics in Public Contracting](#) provides helpful Departmental policy guidance related to practical application of the 2 CFR Part 200 procurement rules to PHAs.

We appreciate your understanding and thank you again for your request. If you have any questions, please contact Eric Hoe, Division Director by email at eric.h.hoe@hud.gov, or by telephone at 305-520-5037 or Janice Clark, Director by email at Janice.Clark@hud.gov.

Sincerely,

3/13/2026

X 

Janice Clark
Director, Office of Public Housing
Signed by: JANICE CLARK

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