



MIAMI HOMES
FOR ALL
SINCE 1985

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TO: Members of the Miami-Dade County Evaluation and Appraisal Report Task Force

RE: Recommended Miami-Dade County Comprehensive Development Master Plan Amendments

After months of informative presentations by the County's administration, it is clear to us all that Miami-Dade is at an inflection point. Our county has reached new levels of prominence, attracting wealth and talent from across the globe. At the same time, Miami-Dade is [losing](#) lower- and middle-income residents who are being driven out by the high cost of living. We are currently missing 90,000 affordable rental homes* for households earning up to about \$75,000 per year, or 80% area median income. For households earning up to 120% of AMI, the gap in affordable units is much less, at 17,000. This gap in affordable supply contributes enormously to the fact that, according to the United Way's [ALICE Report](#), more than half of Miami-Dade households—over 500,000 families—cannot afford the basics. If we do not act quickly to address this crisis, Miami-Dade will end up pushing out or rendering homeless the working families who power our economy, create our culture, and make Miami-Dade competitive on a global scale.

The Comprehensive Development Master Plan (CDMP) provides a vital roadmap for the kind of future-focused growth that will enable Miami-Dade residents to stay and thrive for generations to come. The CDMP should encourage deeper housing affordability and interrupt unsustainable development patterns, such as market-driven displacement and car-dependent suburban sprawl, that undermine affordability and residents' quality of life. Specifically, the CDMP should be amended to strengthen provisions for households earning less than 80% AMI, facilitate affordable infill and smaller-scale multifamily housing, promote dense transit-oriented development, and encourage the responsible disposition of publicly-owned land.

Land Use Element

1. Increase Density for Transit-Oriented Developments. The minimum densities for residential development around transit stations listed in LU-7F are relatively low — 10-20 du/ac translates to single-family homes or duplexes. Raising these minimum densities to 36 du/ac would enable fourplex development, encouraging modest-density or “missing middle” affordable housing closer to public transit. We recognize that such density increases may raise property taxes and rents in affected areas, potentially resulting in resident displacement. We encourage pairing density increases with anti-displacement measures, such as demolition controls that require any demolished affordable units to be replaced 1-for-1, right-to-return policies giving displaced tenants priority access to new affordable units, and property tax abatements for existing, lower-income owners.

2. The UDB and Affordability. Regarding LU-8H, we have serious reservations about allowing any residential development outside the current UDB, because it will 1) fail to address our housing affordability needs and 2) jeopardize the county's efforts to manage flooding and water quality control. First, the affordable housing we need most is priced at 80% AMI and much more so at 50% AMI. Any household residing far from mass transit, jobs, and educational opportunities will incur greater transportation costs than the [current average](#) of around 20% of household income, which could offset much of the reduced costs of

Act, Objective HO-3 should encourage the creation of a publicly-owned land disposition policy that prioritizes deeply (up to 80% AMI) and permanently affordable housing.

3. Create an affordable housing production goal and policies to support it. To significantly increase the production and preservation of affordable housing, other communities have established annual and 10-year affordable housing production targets, while also outlining the resources and policies it would take to reach those targets. Objective HO-3 could promote the creation of such a goal, as well as additional solutions to help achieve it.

- For example, the County should reduce parking requirements in transit-oriented developments in exchange for affordable housing below 80% AMI, while lowering parking minimums or standards for developments (regardless of size) outside the transit radius.
- Secondly, HO-3A's administrative and financial incentives should also be provided for rehabs of existing affordable housing, whether subsidized or unsubsidized, as we are rapidly losing naturally-occurring affordable housing.
- Finally, we recommend amending HO-6D to encourage public and private investment in smaller-scale and infill affordable housing developments. These can increase and diversify the development pipeline while encouraging existing owners to retain their stake in our neighborhoods.

The CDMP is crucial to increasing housing affordability for Miami-Dade County's residents, whether they were here their whole lives or are newly making it their home. We hope that you consider the recommendations above to ensure every resident thrives.

Sincerely,



Annie Lord
Executive Director



*University of Florida Shimberg Center for Housing Studies, 2023 Miami-Dade Affordable Housing Needs Assessment, <https://www.miamihomesforall.org/publications>, page 16.