

August 26, 2022

City of Pompano Beach  
Planning and Zoning Division  
100 W. Atlantic Blvd.  
Pompano Beach, FL 33060

RE: Allocation of Flexibility Units  
1700 Blount Road

Dear City of Pompano Beach,

The Broward Partnership (“BPHI”), in association with Green Mills Development Group, is planning to develop up to 138 residential units on the area in which is, currently vacant open space, east the North Homeless Assistance Center (NHAC) at 1700 Blount Road. Affordable housing supply and homelessness continue to be challenges in the City of Pompano Beach and throughout the country. This residential apartment building will increase the supply of affordable housing for very low- and low-income families and individuals. Broward Partnership prides itself with being a good neighbor and believes that the proposed addition of affordable residential apartments would be ideally suited due to the close proximity of major employers benefiting residents.

This project will consist of 100% Low-Income Housing Tax Credit (LIHTC) units will be restricted to meet the 80% AMI income limit threshold. The Florida Housing Finance Corporation (FHFC) funding application further requires that a minimum of 15% of the units be at the extremely Low Income (ELI) AMI set aside which is currently 28% for Broward County. Half of all units would be set aside for formerly “Homeless Households”, as defined by Florida Housing Finance Corporation which includes formerly homeless and at-risk of homelessness individuals and families”. Therefore, only 15% of the total households would be limited to the 28% AMI income limit.

Currently, Broward Partnership deliver more than 200 emergency beds for the homeless individuals and families within the adjoining County shelter, which is and will remain a completely separate purpose and operation. In no circumstance would any units within this residential apartment project be utilized for emergency housing or for services that are provided in the County’s adjacent Homeless Assistance Center for homeless clientele.

The request is to allocate affordable flex units under the City’s comprehensive plan and Broward County policy.2.16. The ultimate intent of the local land use plan amendment is to allow for the 138 unit affordable residential development.

Pompano Beach is experiencing rapid redevelopment and there is a recognized need for permanent supportive housing and affordable housing. Affordable housing supply and homelessness continue to be issue throughout the country. Broward Partnership provides

[www.KEITHteam.com](http://www.KEITHteam.com)

hundreds beds for the homeless within the existing shelter. Along with the proposed Local Land Use Plan Amendment, rezoning and allocation of flex units, Broward Partnership proposes to develop an affordable 138 unit residential apartment building which will allow for affordable housing of individuals and families while increasing the supply of affordable housing for very-low and low-income individuals. The proposed use of affordable residential apartments is suitable to the character of the area. Providing new housing opportunities affordable housing for the furthers the goals of Broward Partnership and the goals, objectives and policies of the City of Pompano Beach.

#### STANDARDS

1. The property must be located within the Flexibility Zone and flexibility, redevelopment units and/or nonresidential flexibility (based on 5% rule) must be available.

**Response: The site is currently designated Industrial on the land use which prohibits allocation of flex units. However, this request is in concert with a Local Land Use Plan Application to amend the land use to Commercial and rezoning to B-3 enabling allocation of units.**

2. To be eligible for the allocation of flexibility and redevelopment units the applicant must agree to provide affordable housing units on the application site or any one type or combination of types or pay an in lieu of fee as specified in Code Section 154.80.

**Response: The very nature of this request is to provide affordable housing and will enter into agreements to guarantee compliance.**

#### APPROVAL STANDARDS

1. The proposed development is consistent with applicable goals, objectives and policies of the City's Comprehensive Plan.

**Response: This request fulfills the intent of the Comprehensive Plan which is evidenced by the following:**

##### **Objective 03.01.00 Housing to Accommodate Future Population**

The city should provide, through the undertaking of support of public and private development efforts, sufficient housing units through the long-range planning horizon to meet the anticipated population through 2040. Provision of these units shall be based on the need for adequate and affordable housing for all segments of the existing and future population including those households with very-low, low, and moderate income and those with special housing needs, including homelessness.

##### **Policy 03.01.02**

The City shall continue to support Community Redevelopment Agency (CRA) and Development of Housing and Urban Improvement (OHUI) efforts to acquire funds and administer a variety of local, State and Federal housing improvement and low income subtlety programs. In addition, the City shall continue to provide information about low cost housing opportunities to all residents especially those with very-low, low, and moderate income as well as homeless.

##### **Policy 03.01.04**

The City shall continue to cooperate with other local governments concerning providing affordable housing for very-low, low, and moderate income households and the homeless.

**Policy 03.01.06**

The City will continue to work towards implementing a Housing First strategy to address homelessness. AN inventory of affordable housing will be identified that can accommodate the homeless through landlord recruitment, identification of existing affordable housing options and facilitation of creative solutions.

**Policy 03.01.09**

The City will continue to use available density bonus programs provided in the County Land Use Plan to increase the supply of affordable housing, such as allowing residential development in the County's Commerce Land use category by right under certain conditions.

2. The use of flexibility and redevelopment units and/or nonresidential flexibility will produce a reasonable development pattern. The criteria for reasonableness shall include compatibility of adjacent land uses and suitability of the parcel for various development patterns.

**Response: Parcel E is currently a Broward County Community Facility assisting the homeless located in an Industrial land use. Expanding the facility which exists is appropriate and will require rezoning the parcel and amending the land use to Commercial which will allow flex units to be applied, enhancing provision of community services and support a increasing community need. Finding suitable parcels is extremely difficult and this partnership will provide an example of community cooperation.**

3. Applications for the use of residential flexibility or redevelopment units requires an agreement to provide affordable housing units per subsection € in lieu of fee in accordance with section 154.80 except that infill properties which are one-acre or less are exempt from this requirement.

**Response: This proposed project is a 100% affordable housing project. Agreements will be provided as required.**

KEITH and Associates Inc.