

February 17, 2021

Mr. Edward Ng AICP  
Interim Director of Community Development  
Community Development Department  
City of North Miami Beach  
17050 NE 19 Avenue  
North Miami Beach, Florida 3316

## **RE: Skygarden Apartment Building N.E. 163<sup>rd</sup> Street and N.E. 19<sup>th</sup> Avenue – Minimum Average Unit Size Requirements Comparison**

Dear Mr. Ng:

The Applicant for the Skygarden located at N.E. 163<sup>rd</sup> Street and N.E. 19<sup>th</sup> Avenue requested an evaluation of the current Minimum Allowed Dwelling Unit Area requirements of various municipalities Minimum Average Unit Size requirements in said municipalities Miami-Dade County and Broward County.

Table 1 identifies the various municipalities whose zoning codes were reviewed for the Minimum Allowed Dwelling Unit Area requirements for high-rise, high-density buildings and the Minimum Average Unit Size requirements. This analysis was done to compare local practice on the minimum unit area to the current City of North Miami Beach requirements.

The City of North Miami requires a Minimum Allowed Dwelling Unit Area of 550 square feet independent of the unit type, studio, one-bedroom, and so on. It refers to the internal living area of the unit exclusive of balconies or exterior hallways.

The Minimum Average Unit Size allowed by the City of North Miami Beach is 800 square feet. Average Unit Size is the sum of all unit areas divided by the number of units.

Within a building envelope that can be derived from setbacks and allowed building height, the units and parking requirements will drive the building's residential unit density, the number of dwelling units within the structure. Allowed Minimum Average Unit Size will impact the number of dwelling units within a building envelope. The higher the number, the fewer individual units within the building. This number can be altered either by the unit's size, that is to say, a more oversized one-bedroom, or the inclusion of multiple bedroom units with larger dwelling unit footprints.

Market conditions and lifestyle also drive the selection of an Allowed Minimum Average Unit Size. The larger the unit, the larger the construction cost, the bigger the price tag to sell or rent the dwelling unit. As can be expected, certain areas can carry higher rental costs and more significant dwelling unit areas. The required number of parking spaces is also a factor in building affordability as parking costs directly affect the units' rental price. However, sufficient parking is a good marketing tool and will make for a more successful building.

Table 1 Average Unit Area Comparison Miami-Dade and Broward Counties

City of Miami		Miami 21 Code - All Multifamily Areas		
		Minimum Allowed Dwelling Unit Area		Average Unit Size
Unit Type	Efficiency (SF)	One Bedroom (SF)	Two Bedroom (SF)	Not Defined
	400	550	650	
City of Coral Gables		City Zoning Code		
		Minimum Allowed Dwelling Unit Area		Average Unit Size
Unit Type	Not Defined for Multifamily - Comprehensive Plan Policy HOU-1.5.1. Encourage the development of diverse housing types such as smaller, more affordable units within the downtown area and mixed use development overlay area.			Not Defined
City of North Miami		City Zoning Code		
		Minimum Allowed Dwelling Unit Area		Average Unit Size
		750 Square feet but varies see below		Assume 100 Units- 80 Units (80%) are 750 sf. = 60,000 Sf 20 Units (20%) are 550 sf = 11,000 sf Total 71,000 sf
		minimum area for a dwelling unit in multi-family and mixed-use districts is seven hundred fifty (750) square feet, except that up to 20% of units within projects in the NRO and PCD may be five hundred, fifty (550) square feet, and for projects within the SDTOD and the NMTSOD, units may be five hundred square feet		Average Unit Size for NRO and PCD Districts (71,000/100= 710 sf) <b>710 sf</b> 80 Units (80%) are 750 sf. = 60,000 Sf 20 Units (20%) are 500 sf = 10,000 sf Total 71,000 sf Average Unit Size forSTDO Districts (70,000/100= 700 sf) <b>700 SF</b>
City of Miami Beach		Zoning Code		
		Minimum Allowed Dwelling Unit Area		Average Unit Size
		New Construction 550 sf		New Construction 800 sf Non-elderly &elderly low and moderate income 400 sf Workforce housing 400 sf
City of Fort Lauderdale		Zoning Code - Downtown Regional Activity Center (RAC)		
		Minimum Allowed Dwelling Unit Area		Average Unit Size
		New Construction 550 sf		Not Defined

**OTHER COMMUNITIES' MINIMUM UNIT SIZE AND MINIMUM AVERAGE UNIT SIZE**

The spectrum of both the Minimum Allowed Unit Area and the Minimum Average Unit Size allowed varies across Miami-Dade and Broward County. The Minimum permitted unit areas are 400 square feet for efficiency units and 550 square feet for one-bedroom units, and 650 square feet for two-bedroom units for the City of Miami. The minimum allowed unit size for the City of North Miami Beach is 550 square feet of living area.

Coral Gables does not define a minimum area for the multifamily dwellings, and the City's Comprehensive Plan policies encourage the development of varied unit types. Next door to NMB, the City of North Miami requires a minimum of 750 square feet for multifamily units; however, this changes for specific zoning categories. Except that up to 20% of dwelling units within the NRO and PCD zoning district can be five hundred fifty (550) square feet, and for projects within the SDTOD and the NMTSOD, units can be five hundred (500) square feet. Table 1 shows these small units' allowance results in a building with a Minimum Average Unit Size of between 700 and 710 square feet, depending on the zoning category.

This smaller Minimum Average Unit Size is recognized by the code of varying market conditions and the need to make more affordable dwelling units. The City of Miami Beach recognized the need for smaller dwelling units by reducing the Minimum Allowed Average Unit Size to 400 square feet for elderly, low and moderate-income, and workforce housing. In Broward County, the City of Fort Lauderdale requires a minimum unit area of 500 square feet and does not define Average Unit Size.

The limited research indicates that urban areas' trend is to lower the units' living area to create a more affordable product. There is a trend to allow smaller unit areas to provide more affordable housing options. We can see this trend throughout major metropolitan areas in the U.S. and in Miami-Dade County and Broward County.

**City of North Miami Beach  
 LAZUL Residential Building Average Unit Size Less than 800 Square Feet**

Table 2 presents the Average Unit Size for the Lazul Residential building illustrated in the concept design drawings approved before developing construction documents. Table 3 shows the actual unit sizes as constructed and advertised on the Lazul Building web page. As can be seen, there appears to be a discrepancy between the area of the units in the design drawings approved and the actual rental unit areas. Please refer to the table presented with the design drawings and the snapshot of Lazul's web page. The difference between the two tables shows a disparity between what was constructed and approved for design. This assuming that what is shown on the Lazul web page are the actual unit areas. It is my opinion that the unit areas advertised are the constructed areas.

*Table 2 Lazul Average Plan as Indicated in Approved Design Drawings*

Lazul Design Plan Indicated Average Unit Size				
Unit Type	Number of Units	Percentage of Total Units	Square Footage of Units as indicated in Plans	Average Unit Size as Indicated in Plans
Studio	37	10.60%	631	Total Unit Area = 304,598 sf Units =349 Average Unit Size = <b>873 sf</b>
Studio	7	2.01%	508	
1 BR	113	32.38%	708	
1 BR	35	10.03%	730	
2 BR	106	30.37%	1,062	
2BR	22	6.30%	1,007	
2BR	2	0.57%	1,215	
3 BR	8	2.29%	1,285	
3 BR	6	1.72%	1,240	
3 BR	6	1.72%	1,389	
Duplex	6	1.72%	1,270	
	1	0.29%	1,311	
	349	100.00%		



Change in Unit Area

I think the difference in areas may result from a calculation that may have included hallways or balconies. The actual areas' analysis is thus skewed and result in a larger Average unit Size of 873 square feet than what was constructed. It is my opinion that this could be one of the reasons for the difference. Another line of thought would say that design changes from the original approved design were incorporated in the construction documents. These changes resulted in the lower

Average Unit Size constructed of 733 square feet. Again this opinion is based on examining the tables presented in both the design package and the Lazul web page and does not represent a deeper investigation of the process that resulted in what seems to be a lower Average Unit Size for the constructed building.

Table 3 Lazul Web Page Rental Average Unit Size

<b>Lazul Web Page Rental Average Unit Size and Unit Type Distribution</b>				
<b>Unit Type</b>	<b>Number of Units</b>	<b>Percentage of Total Units</b>	<b>Square Footage of Livable Area as indicated in Web Page</b>	<b>Average Unit Size as Indicated in Web Page for Livable Area</b>
Studio	11	3.15%	636	Total Livable Area = 255,783 sf Units =349 Average Unit Size = <b>733 sf</b>
Studio	11	3.15%	682	
1 BR/1 B	168	48.14%	637	
2 BR/2 B	130	37.25%	754	
3 BR/2B	14	4.01%	1,236	
3BR/2B	15	4.01%	1,263	
	349	99.71%		

What appears to be the actual Average Unit Size is much less than the required 800 square feet. It represents nearly a 10% reduction in the actual Average Unit Size for the building. According to anecdotal

comments, this is a successful building. The City of North Miami Beach has what appears to be a recently constructed building with an Average Unit Size of less than 800 square feet.

The Applicant should revise his calculations to include the balconies in the calculation the Minimum Average Unit Size. Taking private balconies, only accessible directly from the dwelling unit into consideration, will increase said Average Unit Size and be closer to what has been previously constructed.

These findings are the limit of my investigation. I am available to respond to any comments or questions you may have.

Sincerely,

Alfredo Sanchez AIA AICP

# LAZUL – Unit Areas as Approved- Site Plan Approval\*

## PROJECT DATA TABLE

RETAIL AREA	1	2	3	4	5	6	7	LEASING	TOTAL
	1,558	1,558	1,558	1,559	1,132	1,269	1,182	1,169	10,985

STUDIO	SQFT	L1	L2	L3	L4	L5	L6	L7	L8	UNITS	TOTAL SQFT PER UNIT TYPE
D1	631	2	5	5	5	5	5	5	5	37	23347
D2	508		1	1	1	1	1	1	1	7	3556
1 BR	SQFT	L1	L2	L3	L4	L5	L6	L7	L8		
A1	708	15	14	14	14	14	14	14	14	113	80004
A6	730		5	5	5	5	5	5	5	35	25550
2 BR	SQFT	L1	L2	L3	L4	L5	L6	L7	L8		
B1	1,062	8	14	14	14	14	14	14	14	106	112572
B2	1,007	1	3	3	3	3	3	3	3	22	22154
B3	1,215	1	1							2	2430
3 BR	SQFT	L1	L2	L3	L4	L5	L6	L7	L8		
C1	1,285	1	1	1	1	1	1	1	1	8	10280
C6 (A)	1,240			1	1	1	1	1	1	6	7440
C6 (B)	1,389			1	1	1	1	1	1	6	8334
DUPLEX	SQFT										
	1270	6								6	7620
	1311	1								1	1311
											8931
TOTAL		28	44	45	45	45	45	45	45	349	304598

## UNIT BREAK DOWN

TOTAL UNITS AND RETAIL SQFT		315,583
TOTAL UNITS		349

\*From LAZUL Site Plan Approval drawing set- City of NMB



# LAZUL- Dwelling Unit Areas as Constructed\*



## Studio A1

Studio 1 Bathroom 682 sq.ft.

\$1776 - \$1881

[Check Availability](#)



## 1 Bedroom

1 Bedroom 1 Bathroom 637 sq.ft.

\$1815 - \$2052

[Check Availability](#)



## 2 Bedroom

2 Bedroom 2 Bathroom 754 sq.ft.

\$1918 - \$2739

[Check Availability](#)



## 3 Bedroom

3 Bedroom 2 Bathroom 1236 sq.ft.

\$2677 - \$2820



## 3 Bedroom Loft

3 Bedroom 2 Bathroom 1263 sq.ft.

\$2140 - \$2140



## Studio

Studio 1 Bathroom 636 sq.ft.

\$1745 - \$1848



\*From LAZUL Web Page rental advertisement

# Cities with Smallest Average Apartment Areas - US

- This is an average that includes larger units also.



## TOP 20 CITIES WITH SMALLEST APARTMENTS IN THE U.S.

#	City	Average Size (sqft)
1	Seattle, WA	711
2	Manhattan, NY	733
3	Chicago, IL	733
4	Washington, DC	736
5	San Francisco, CA	737
6	Tucson, AZ	738
7	Los Angeles, CA	771
8	Glendale, AZ	781
9	Phoenix, AZ	783
10	Minneapolis, MN	785
11	Wichita, KS	787
12	Detroit, MI	791
13	Cleveland, OH	796
14	Mesa, AZ	801
15	Philadelphia, PA	801
16	Portland, OR	802
17	Albuquerque, NM	804
18	Pittsburgh, PA	811
19	Toledo, OH	811
20	El Paso, TX	812