

AGREEMENT TO DELETE QUESTIONS

Updated: May 8, 2025

Project Name: City Park Development of Regional Impact

Project Location: Miami-Dade County (Unincorporated), Florida

Applicant/Developer: Krome Groves Land Trust

Section 380.06(7)(b), Florida Statutes (F.S.), stipulates that the regional planning agency "shall establish by rule a procedure by which a developer may enter into binding written agreements with the regional planning agency to eliminate questions from the application for development approval when those questions are found to be unnecessary for development-of-regional-impact review". To comply with this provision, the South Florida Regional Planning Council and the Applicant hereby agree that the Applicant shall submit sufficient information, as determined by the Council, in the application for development approval (ADA) for only those questions which are specified as being required in the following agreement:

	<u>Required</u>	<u>Not Required</u>
1. Applicant/Project Identification	X	
2. Applicant	X	
3. Authorized Agents	X	
4. Ownership/ Adjacent Property	X	
5. Legal Description	X	
6. Binding Letter /Preliminary Development Agreement	X	
7. Government of Jurisdiction	X	
8. Permitting Agencies and Permit Applications	X	
9. Maps:	X	
A. General Location	X	
B. Recent Aerial Photo	X	
C. Topography	X	
D. Existing Land Use	X	
E. Soils	X	
F. Vegetation Association	X	
G. Sampling Station Locations and Observed Significant Resources	X	
H. Master Development Plan	X	
I. Master Drainage	X	
J. Highway and Transportation Network	X	

	<u>Required</u>	<u>Not Required</u>
10. General Project Description		
Part I - Specific Project Description		
A. Summary	X	
B. Existing and Proposed Land Uses	X	
C. Previous and Existing Activities	X	
D. Primary and Secondary Market Area	X	
E. Description of Project Demand	X	
F. Project Costs Table (SFRPC requirement)	X	
G. Social and Economic Disparities (SFRPC required)	X	
Part II - Consistency with Comprehensive Plans		
A. Local Plan	X	
B. Regional Plan	X	
C. State Plan	X	
Part III - Demographic and Employment Information		
A. Demographic and Employment Tables (include North American Industry Classification System [NAICS])	X	
Part IV - Impact Summary		
A. Impact on Natural Resources	X	
B. Public Facility Capital Costs	X	
11. Revenue Generation Summary	X	
12. Vegetation and Wildlife		
A. Identification of Plant Species	X	
B. Discussion of Survey Methods	X	
C. State/Federal Listed Species	X	
D. Impact to Listed Species	X	
E. Mitigation for Impacted Species	X	
13. Wetlands		
A. Existing Conditions and Proposed Impacts	X	
B. Creation or Enhancement Plans	X	
14. Water		
A. Existing Hydrologic Conditions	X	
B. Existing Water Quality	X	
C. Mitigation Measures	X	

	<u>Required</u>	<u>Not Required</u>
15. Soils		
A. Description of Soils	X	
B. Site Alteration and Construction Methods	X	
C. Soil Erosion Control Measures	X	
D. Fill and Spoil Information	X	
16. Flood Plains		
A. Identification of Flood Prone Areas	X	
B. FIRM Zone Designations	X	
C. Flood Hazard Measures	X	
D. Off-Site Flooding Impacts	X	
17. Water Supply		
A. Potable/Non-Potable Water Demand	X	
B. Potable/Non-Potable Water Supply	X	
C. On-Site Wells	X	
D. Impact to Existing Wells and Aquifer	X	
E. Operation/Maintenance of Internal Water Supply	X	
F. Letter from Off-Site Supplier	X	
G. Conservation Measures	X	
H. Service Area Boundary	X	
18. Wastewater Management		
A. Projected Generation and Proposed Treatment	X	
B. Description of Pre-Treatment Techniques	X	
C. Letter from Off-Site Treatment Authority	X	
D. Septic Tank Identification		X
E. Service Area Boundary	X	
19. Stormwater Management		
A. Existing On-Site Drainage Patterns	X	
B. Proposed Drainage System	X	
C. On-Site Drainage Areas	X	
D. Run-Off Volume and Quality	X	
E. Identification of Operation/Maintenance Authority	X	

	<u>Required</u>	<u>Not Required</u>
20. Solid/Hazardous/Medical Waste		
A. Solid Waste Generation	X	
B. Waste Management		
1. Specification of Waste Generated	X	
2. Separation Measures	X	
3. Identification of Off-Site Disposal	X	
4. Applicable Regulations, Permits and Plans	X	
C. Documentation		
1. Letter from Developer	X	
2. Letter from Service Provider	X	
21. Transportation (Revised Transportation Methodology attached)		
A. Existing Conditions	X	
B. Projection of Vehicle Trips	X	
C. Estimation of Internal/External Split	X	
D. Total Peak Hour Directional Traffic	X	
E. Assignment of Trips Generated	X	
F. Recommended Improvements	X	
G. Site Access Plan	X	
H. Protection of Transportation Corridors	X	
I. Provisions for Alternative Modes of Transportation	X	
22. Air Impacts		
A. Site Preparation and Construction Measures to Minimize Impacts	X	
B. Structural/Operational Measures to Minimize Impacts	X	
C. Analysis of Impacted Intersections & Parking Facilities (Table 22-1)	X	
D. One-Hour/Eight-Hour Emissions	X	
E. Identification of Mitigation Measures	X	
23. Hurricane Preparedness		
A. Identification of Designated Areas		
1. Vulnerability Zone	X	
2. High Hazard Evacuation Area	X	
3. Special Preparedness District	X	
B. Identification of Evacuation Requirements		
1. Shelter Space Need and Availability	X	
2. Evacuation Route Capacity	X	
C. Identification of Mitigation	X	

	<u>Required</u>	<u>Not Required</u>
24. Housing		
A. Residential Development Characteristics	X	
B. Housing Availability /Employment Opportunities	X	
C. Provisions for Displacement/Relocation		X
25. Police and Fire Protection		
A. Dedication of Facility or Site	X	
B. Letter from Service Provider	X	
26. Recreation and Open Space		
A. Description of Facilities and Open Space	X	
B. Assessment of Impact to Public Access	X	
C. Identification of Maintenance Authority	X	
D. Description of Consistency with Local and Regional Policy	X	
E. Assessment of Impact to Recreation Trail Designation	X	
27. Education		
A. Estimation of Number of School Age Children	X	
B. Provision of Facilities or Sites	X	
C. Letter from the School Board	X	
28. Health Care		
A. Description of Facilities and Services	X	
B. Letter from Service Provider	X	
29. Energy		
A. Projection of Energy Demands	X	
B. Description of On-Site Electrical Generating Facility	X	
C. Letter from Off-Site Supplier	X	
D. Description of Energy Conservation Methods or Devices	X	
	X	
30. Historical and Archaeological Site		
A. Description of Sites	X	
B. Protection/Mitigation Measures	X	

	<u>Required</u>	<u>Not Required</u>
31. Airports		
A. Existing Conditions	X	
B. Copy of Layout Plan	X	
C. Copy of FAA Application		X
D. Identification of Flight Patterns	X	
E. Identification of Subsidiary Development		X
F. Description of Passenger Circulation System		X
32. Attractions and Recreation Facilities		
A. Projection of Attendance		
1. Daily High, Low and Average		X
2. Figure 32.1 - Monthly Distribution		X
3. Figure 32.2 - Daily Distribution		X
4. Figure 32.3 - Hourly Distribution		X
B. Identification of Alternative Transportation Systems		X
C. Identification of Transportation System Interface		X
33. Hospitals		
A. Specification of Proposed Facility		X
B. Identification of Related Facilities		X
C. Copy of Certificate of Need		X
34. Industrial Plants and Parks		
A. Identification of Types of Operations	X	
B. Identification of Support Industry	X	
C. Transportation Requirements	X	
D. Specification of Work Shifts	X	
35. Mining Operation		
A. Description of Operation		X
B. Water Use Requirements		X
C. Impact on Aquifer		X
D. Maintenance and Inspection Requirements		X
E. Description of On-Site Processing Operation		X
F. Identification of Radioactive Material		X
G. Reclamation Plan		X
H. Identification of Mineral Destination		X
I. Identification of Shipping Modes		X
J. Transportation Requirements		X

	<u>Required</u>	<u>Not Required</u>
36. Petroleum Storage Facilities		
A. Description of Existing Facilities		X
B. Description of Proposed Development		X
C. Identification of Transport Methods		X
D. Vapor Emission and Spillage Response		X
37. Port and Marina Facilities		
A. Existing Conditions		X
B. Conceptual Plan		X
C. Commodity and Passenger Statistics		X
D. Transportation System Expansion Requirements		X
E. Dredge and Fill Requirements		X
F. Oil Spill Clean-Up		X
G. Description of Subsidiary Development		X
H. Discussion of Increased Shipping Activity		X
38. Schools		
A. Description of Proposed Development and Program		X
B. Enrollment Impact Area		X
C. Identification of Design Population		X
39. Other (as specified below - Sea Level Rise)		X
40. Agriculture	X	

The Applicant shall employ the methodologies, data sources, assumptions, and techniques for analysis in its ADA as detailed in Appendix A. The Applicant shall include all supporting materials (data source, assumptions, calculations, etc.) with the ADA and any sufficiency updates. In addition, the ADA must be submitted within one (1)-year of the execution of this Agreement. If the ADA is not submitted within one (1)-year of execution of this Agreement, the Agreement is void and a new pre-application conference shall be required. The Applicant will coordinate with Miami-Dade County regarding the data and analysis guidelines for the concurrent Comprehensive Master Development Plan (CDMP) and zoning amendments, since those requirements may differ from the ADA's.

Prepared on this 14th day of May 2025.

By:



for Krome Groves Land Trust (Applicant)

Jeffrey Bercow

Print Name

Date: 05/14/2025



for the South Florida Regional Planning Council

Isabel Cosio Carballo, MPA, Executive Director

Print Name

Date: May 19, 2025

APPROVED AS TO LEGAL FORM



DATED: 5/16/2025

Appendix A

1. Questions 1 - 11

The Applicant shall provide the entirety of the information requested in Questions 1 - 11 as presented in FORM DEO-BCP-ADA-1 and required by Rule 73C-40.010, Florida Administrative Code (F.A.C.).

2. Question 12 (Vegetation and Wildlife)

The Applicant noted that the City Park site is currently comprised of farm fields and is not within the critical habitat of any listed species. The Applicant also noted the full site was walked and no listed flora or fauna was observed.

Applicant shall coordinate and consult with the Florida Fish and Wildlife Conservation Commission (FWC) regarding methodology and related assumptions and data sources to assess which, if any, listed species will be utilized for analysis. In addition, environmental studies regarding the presence of endangered species shall be required. Furthermore, the Applicant shall coordinate and consult with the Miami-Dade County Division of Environmental Resource Management (DERM) regarding methodology and related assumptions and data sources to assess which CDMP-listed species shall be utilized for analysis. In addition, environmental studies regarding the presence of CDMP-listed endangered species shall be required.

The GIS data for critical habitat areas is available for direct download from the Miami-Dade County Open Data Hub and the most recent version of the dataset was last updated August 28, 2019. Examples of additional data sources that shall be reviewed for further analysis of relevant spatial information include wood stork nesting colonies and core foraging areas and the spatial extent of the Florida Panther Focus Area, both of which are available for download from the Florida Geographic Data Library Metadata Explorer (FGDL), and were last updated on April 10, 2020, and December 12, 2015, respectively.

The proposed additional field evaluation of the study area shall be conducted to specifically evaluate the potential presence of both state and federally listed wildlife species and their habitats within the site. Wildlife observations shall include indirect indicators of wildlife utilization such as tracks, scat, calls or vocalizations, burrows, nests, and roosting sites. Specific attention shall be given to all nesting and roosting sites documented during the study period. All the locations of documented field occurrences of listed species, or their nests, burrows or roosts, and other indirect wildlife indicators shall be GPS recorded and documented on scaled aerial photographs and maps of the site. No trapping shall be proposed to be included as part of the field evaluation as site review and field observation are deemed suitable for the habitat areas and potentially include wildlife taxa anticipated to occur within the proposed project limits.

In addition to the field reconnaissance effort to evaluate overall wildlife utilization, more in-depth analyses will also be conducted to assess the potential impacts specifically to foraging habitat for the snail kite, wood stork, and the Florida bonneted bat (FBB). Potential impacts to wood stork foraging habitat shall be assessed in accordance with the Wood Stork Foraging Habitat Assessment Methodology, a functional assessment developed by USFWS for estimation of available biomass of wood stork forage per unit quantity of wetland habitat. The parameters considered for determination include vegetation density, wetland hydroperiod, prey size suitability, and competition with other wading birds. The differentiation of hydroperiod classes established by the USFWS methodology shall also be assessed via analysis of available hydrology and LiDAR data. Data sources include the DBHYDRO Data Portal (SFWMD), and the GIS LiDAR elevation dataset obtained from the Miami-Dade County Open Data Hub.

Potential impacts to snail kite habitat shall be assessed in accordance with the Snail Kite Survey Protocol. In accordance with the survey protocol, the adequacy of snail kite habitat shall be determined by the presence of appropriate foraging habitat as evidenced by coverage of hydrophilic vegetation (*Panicum* spp., *Eleocharis* spp., *Rhynchospora* spp.), nesting or perching substrate (*Salix caroliniana*, *Melaleuca quiquenervia*, *Cladium jamaicense*), appropriate water depth (0.2-1.3m) under nesting substrate, and adequate distance (>150m) between nesting substrate and upland areas. The analysis of water depth adequacy to utilize a similar methodology as the hydroperiod class assessment detailed above (i.e., DBHYDRO and LiDAR data).

The potential for impacts to roosting and foraging habitat for the FBB shall also be assessed during the field inspection. Being that portions of the onsite agricultural lands are comprised of tree farming activity, any trees documented to be of sufficient size and diameter shall be recorded and depicted on site maps as having the potential to provide roosting opportunities. An acoustic survey shall be conducted in accordance with USFWS guidelines for the adequate number of acoustic recordings in terms of calendar nights and locations throughout the site. The subsequent analysis of recorded calls shall allow for accurate determination of roosting or feeding activity within the site or the immediate vicinity to assess the presence or overall utilization of the site by FBB.

3. Question 13 (Wetlands)

The Applicant stated that the City Park site is classified as an “upland” in the National Wetland Inventory. The Applicant also stated the site was inspected on February 9, 2022, to confirm site conditions, and no wetlands were observed.

The Applicant shall coordinate and consult with Miami-Dade County to conduct a determination of wetlands to determine whether wetlands are present on the site. Applicant shall detail how its proposed project shall address the location of, and the potential impacts to, existing wetlands, or

demonstrate how impacts to wetlands on the site shall be avoided and/or mitigated. If areas located within the proposed project area contain state jurisdictional wetland areas, site inspections with SFWMD and Miami-Dade County staff shall be required for proposed projects for the identification or conclusions regarding the absence or presence of wetlands. Any environmental considerations, including elimination or reduction of wetland impacts and mitigation requirements shall need to be addressed as part of the Environmental Resource Permit (ERP) applications, in accordance with Rule 62-330.060(2), F.A.C. and Section 10.0 of the SFWMD's Environmental Resource Permit Applicant's Handbook Volume I.

The additional onsite evaluation shall be performed to confirm the presence of wetland areas pursuant to the applicable Florida wetland delineation protocol contained in §373.019, Florida Statutes (F.S.), the techniques included in 62-340, F.A.C. and by the US Army Corps of Engineers Wetland Delineation Manual (last updated 2018). The wetland evaluation and review shall be incorporated into the evaluation of vegetation within the study area. Initial techniques that shall be used to determine the potential extent of wetland areas onsite include the review of past wetland permits or jurisdictional determinations, and additional review of recent and historic aerial photographs of the site to determine the potential presence of natural areas. Additional field analysis shall be conducted to confirm the current onsite conditions concerning vegetation, surface hydrology, and soils. Measurements of the existing groundwater table elevation within onsite irrigation wells located throughout the site shall be compared to the ground surface elevation to determine the potential for site inundation or soil saturation. Observations of potential hydrologic indicators and coverage of hydrophilic vegetation shall be documented throughout the subject property. More extensive evaluation of site hydrology and soil profile shall be localized preliminarily identified areas with greater potential to exhibit wetland characteristics. All areas confirmed to contain all three of the required wetland parameters (two confirmed parameters for the state of Florida determination) shall be delineated on a scaled aerial photograph of the site and included in the overall habitat analysis.

The results of the survey shall then be provided in support of the proposed formal requests for Jurisdictional Determinations that shall be submitted to pertinent agencies including the USACE, the State of Florida (FDEP or SFWMD), and DERM. The formal determinations conducted by the agencies shall ultimately determine the presence of jurisdictional wetland areas onsite, thereby establishing the criteria for environmental considerations that may or may not be needed in accordance with Rule 62-330.060(2), F.A.C. and Section 10.0 of the SFWMD's Environmental Resource Permit Application's Handbook Volume I.

Although the site is anticipated to be devoid of wetland resources, any project-related impacts are proposed to be offset by a suitable mitigation plan that may incorporate the preservation of onsite natural areas or be transferred to an approved offsite mitigation area. If the additional field

analysis does result in the identification of areas that may be considered appropriate for onsite preservation, enhancement, or restoration, then the final mitigation plan shall incorporate an onsite component to maintain these natural areas as deemed practicable. Additionally, any documented listed plant and wildlife species within the study area shall be protected from impacts during the construction process. In conclusion, any long-term alterations to the project site resulting from the proposed development shall be offset through appropriate habitat and species mitigation.

4. Question 14 (Water) and Question 17 (Water Supply)

The Applicant indicated that the hydrology at its City Park site was evaluated using existing SFWMD groundwater well data. The Applicant chose South Florida Water Management District's Well S338_T as the most representative. Well S338_T data was used to calculate short and long hydroperiods to compare existing ground elevations.

The Applicant noted that the City Park site was inspected on February 9, 2022, to confirm site conditions and verify groundwater elevations.

The hydrologic conditions within the subject property and immediate vicinity were analyzed using available groundwater elevation data from the DBHYDRO data portal maintained by the SFWMD. As specified in Rule 62-340.550, F.A.C (Wetland Hydrology), reliable hydrologic records can be used to indicate whether inundation or saturation occurs during conditions that represent long-term hydrologic conditions. An additional assessment shall be conducted to analyze the available data to determine historical patterns of regular and periodic inundation at the site, if any. The groundwater elevation data within the site vicinity shall be evaluated for the available periods of record and additional well locations can also be assessed. The GIS analysis of available LiDAR data shall be conducted to create classifications of onsite topography according to the established hydroperiod elevation criteria for desired inundation and saturation conditions, as defined in 62-340.200, F.A.C. The availability of instantaneous time series data from the DBHYDRO data portal shall also be utilized to evaluate the concurrence of water table measurements within onsite irrigation wells with the recorded time series data. The comparison of data points shall allow for calibration of real-time vicinity data to onsite groundwater elevation measurements. The accuracy of the DBHYDRO groundwater data as representative of the onsite hydrology can therefore be determined.

Applicant shall demonstrate that there shall be adequate and available water supply to serve the proposed development area when they shall be available, and how future potable and non-potable water needs are being planned for or how they shall be implemented. The following issues also shall be addressed in the application:

- a. The application shall demonstrate consistency with the Miami-Dade County Water Supply Facilities Work Plan. The application shall also demonstrate consistency with the soon-to-be-updated 2024 Lower East Coast Water Supply Plan.
- b. A modification of Miami-Dade County's Water and Sewer Department Water Use Permit (#13-00017-W) was approved by the SFWMD on March 08, 2022. The application shall demonstrate consistency with that modified permit.
- c. The proposed DRI application must include a commitment from the Miami-Dade Water and Sewer Department that they have, or will have, sufficient potable water available to serve the proposed development, that they will provide potable water to serve the proposed development, and when the water will be available.
- d. The Applicant shall address whether potable and/or non-potable water will be used for landscape irrigation. The Applicant shall clarify if alternative water sources and/or non-potable water will be used instead of potable water to support the non-potable water needs of the proposed land uses. The analysis shall include the following:
 - i. The proposed source(s) of water for landscape irrigation.
 - ii. An explanation of how the proposed land uses would or would not use either on-site wells or reclaimed water for landscape irrigation in portions of the project that do not require potable water supply. If on-site wells are proposed for irrigation uses, a SFWMD Water Use Permit shall be required.
 - iii. If potable water is to be used for landscape irrigation, the Applicant shall provide information to demonstrate how the use of potable water is consistent with provisions of the County's CDMP, including but not limited to Objectives CON-4 and ICE-4 and Policies CON-4A and ICE-4F, and shall protect water recharge areas and encourage the use of alternative water technologies to meet water demand.
- e. Separate projections for potable and non-potable water use shall be provided. The water and sewer demand shall be based on Miami Dade County's "Schedule of Daily Rated Gallonage for Various Occupancy". The proposed demand for non-potable water uses shall be provided in accordance with current industry standards for similar development projects. The application shall also demonstrate consistency with the updated Miami-Dade County Work Plan.
- f. The Applicant shall coordinate and consult with Miami-Dade to evaluate water and sewer infrastructure improvements required to serve the development. The water and sewer demand shall be based on Miami Dade County's "Schedule of Daily Rated Gallonage for Various Occupancy". The proposed demand shall be compared to the current permitted

public water and sanitary sewer treatment plant capacity as reported in the current FDEP permits for each facility serving the development. The application shall also demonstrate consistency with the updated Miami-Dade County Work Plan.

- g. If the total project water demand is 1 MGD or greater, per Section 32-85 of the Miami-Dade County Code, the feasibility of an alternative water supply project shall be evaluated.
- h. All future development shall be required to comply with water use efficiency techniques for indoor water use and with landscape standards in accordance with Sections 8-31, 32-84, 18- A, and 18-B of the Miami-Dade County Code, consistent with Policies WS-5E and WS-5F of the CDMP. Also, per Section 8A-381 (c) of the Miami-Dade County Code, effective January 1, 2009, all permit applications for new multifamily residential developments shall be required to include a sub-meter for each individual dwelling unit.
- i. Changing a large area from agricultural use to commercial and residential uses is likely to affect water quality in the surrounding area. The Applicant shall utilize Harper Methodology, as developed with FDEP, and the “BMP Trains” software to determine the pre-development vs. post-development nutrient loading concentrations. This analysis shall determine the BMPs required so the stormwater runoff post-development pollutant loading shall be less than the existing loading in the existing condition.
- j. Consult with Miami-Dade County to obtain the best available data on the most recent water supply planning and water and wastewater information and plans. The application shall also demonstrate consistency with the updated Miami-Dade County Work Plan.
- k. Include a development table to evaluate public water and sanitary sewer treatment plant capacity. The water and sewer demand shall be based on Miami-Dade County’s “Schedule of Daily Rated Gallonage for Various Occupancy” to develop the water and sewer demand. The proposed demand shall be compared to the current permitted public water and sanitary sewer treatment plant capacity as reported in the current FDEP permits for each facility serving the development.
- l. The proposed project area does not currently have central water or sewer facilities to serve the area and potential proposed development. The proposed project shall include and identify needed provisions and additions to the Capital Improvements Element (CIE) and the Five-Year Capital Improvements Schedule (CIS) for the needed facilities. This includes both publicly and privately funded projects necessary to achieve and maintain the adopted level of service standards, even if the County is not responsible for the improvements. The following issues shall be addressed as applicable:
 - i. Identification of needed facilities for central water and central sewer facilities.

- ii. Include a projected schedule for the needed projects and indicate if the projects are currently funded or unfunded. If a project is unfunded, provide a level of priority for funding.

The Applicant shall coordinate with the Miami-Dade County Water and Sewer Department (MDWASD) to develop a proposed water and sewer spine infrastructure network. MDWASD and the Applicant shall coordinate to update the overall MDWASD water and sewer model to determine the required onsite and offsite improvements to support the project. After the MDWASD analysis is completed, the applicant shall prepare a capital improvement and funding plan for the required facilities.

The needed provisions and additions that are identified shall be included in the Capital Improvements Element (CIE) and the Five-Year Capital Improvements Schedule (CIS) and will require an amendment to the County's Comprehensive Development Master Plan. The application should also demonstrate consistency with the updated Miami-Dade County Work Plan.

5. Question 15 (Soils)

The Applicant shall indicate the soils characteristics of the subject property using the available GIS dataset of the soil survey provided by the United States Department of Agriculture, National Resource Conservation Service (NRCS). The GIS data for the NRCS soil survey is available for download from the FGDL Metadata Explorer and the most recent version of the dataset was last updated for the State of Florida on October 1, 2021. Confirmation of the soil type shall be performed via soil profile analysis to be conducted during the proposed additional site inspection.

6. Question 16 (Floodplains) and Question 19 (Stormwater Management)

The Applicant shall include the following:

- a. The Conceptual Stormwater Management Plan shall be prepared in accordance with the latest versions of the Miami-Dade County Public Works Manual, the Miami-Dade County Water Control Plan, Chapters 24 and 11 C of the Code in effect at the time of the Stormwater Plan submittal or subsequent Stormwater Plan modification submittal, as well as the South Florida Water Management drainage regulations in effect at the time of the Stormwater Plan submittal or subsequent Stormwater Plan modification submittal. The Stormwater Plan shall describe how stormwater will be managed and shall include details for any proposed off-site stormwater conveyance.
- b. If the proposed development within the Property includes the proposed use of the County's stormwater infrastructure (such as use of a County canal) as a conveyance element to off-site storage area(s), the Owners shall, at their expense, provide an

additional engineering report and stormwater plan (the "Off-site Stormwater Conveyance Plan") to DERM for review and approval. The Off-site Stormwater Conveyance Plan shall be signed and sealed by a professional engineer licensed in the State of Florida and shall provide engineering calculations and sufficient detail, including the required conveyance capacity (existing plus additional), to demonstrate that the development's proposed use of the County's infrastructure for stormwater conveyance does not result in negative impacts to the County's stormwater system and watershed areas, and does not result in reduction of the current Flood Quantity Level of Service (FQLOS) or Water Quality Level of Service (WQLOS). Upon approval of the Off-site Stormwater Conveyance Plan, the Owners shall, at their expense, undertake or cause the following to be undertaken: obtain all required permits, construct improvements, and provide additional dedication of canal right-of-way and canal maintenance easement acceptable to Miami-Dade County for all improvements to public stormwater infrastructure as may be required for the development's use of this infrastructure for offsite stormwater conveyance.

- c. A comprehensive conceptual stormwater management plan, including a demonstration that adjacent agricultural properties shall not be impacted and drainage from the expanded Urban Development Boundary (UDB) area shall not cause water levels in adjacent areas to increase and thereby negatively impact drainage for areas further to the west. The Applicant must detail the data sources, methodologies, assumptions, and analyses that shall be used to conduct a comprehensive conceptual stormwater management plan.

The Applicant shall prepare a conceptual stormwater management plan for the overall development utilizing the following data sources, methodologies, and assumptions.

- Utilize Miami-Dade County's Average October Water table and Miami-Dade County Flood Criteria Maps for design groundwater elevation and county flood criteria.
- Utilize SFWMD ERP Applicant's handbook for total rainfall depth for key design storms.
- SCS Design Methodology to estimate total runoff volume generated by the development.
- Utilize Harper Methodology, as developed with FDEP, and the BMP Trains software to determine the pre-development vs. post-development nutrient loading concentrations.
- Assume a two-foot rise in groundwater elevations due to sea-level rise as currently proposed by Miami-Dade County in the Stormwater Management Program Master Plan Update (FY 2021) prepared by Miami-Dade County and GIT Consulting, LLC.

- Miami-Dade County Water Control Plan has a planned canal, C-1 Ext, to run east-west with an eventual connection to the primary Black Creek Canal West. Demonstrate how the proposed development shall be designed to not cause flooding impacts to adjacent properties; provide the necessary retention areas and or provide a new conveyance canal to direct excess stormwater runoff to the nearest primary canal.
- d. The existing grade at the application site is approximately 6 to 7 feet NAVD88. While the site is far from the coast, it will be affected by sea level rise indirectly as rising water levels affect regional water management systems, groundwater levels, and water levels in the Everglades. While it is possible to reduce flooding risks by modifying the site and building designs, it is important to be clear that some existing flood mitigation requirements do not account for sea level rise. The existing requirements and standards based on the Federal Emergency Management Agency's Flood Insurance Rate Map do not include sea level rise. Therefore, complying with existing code requirements for finished floor elevations will not be sufficient to address flooding risks amplified by ongoing sea level rise over the lifetime of any proposed development. Additionally, elevating one area on fill to reduce flood risks may increase flooding risks for adjacent areas if the run-off is not carefully managed. Typically, a development would be required (or designed) to maintain a certain volume of stormwater on site. However, if there were a strong, wet storm exceeding the stormwater design level the additional water would run off site. If adjacent or downstream areas are at a lower elevation, they may experience increased flooding. The design will assume a two-foot rise in groundwater elevations due to sea-level rise as currently proposed by Miami-Dade County in the Stormwater Management Program Master Plan Update (FY2021) prepared by Miami-Dade County and GIT Consulting, LLC.
- e. Fill requirements may raise the base level of the site, and the Applicant shall demonstrate that stormwater runoff shall not affect adjacent properties or rights-of-way/infrastructure and be retained onsite.
- f. The minimum fill elevations shall be based on the proposed Miami-Dade County Flood Criteria (Miami-Dade County Flood Criteria Map dated 9/24/2021) and the current FEMA Flood maps at the time of development.
- g. Stormwater was modeled by DERM with the project site as agriculture. The Applicant shall detail the data sources, methodologies, assumptions, and analyses used to assess the development program's impacts to regional drainage. The Applicant shall utilize the stormwater model results completed by DERM as a baseline in the conceptual stormwater management system. The model shall be used to determine adjacent area flood elevations.

- h. The Southern Everglades Study is coming. The Study shall provide an analysis of how to accommodate 342,000-acre feet of water through seepage management. The Applicant shall detail the data sources, methodologies, assumptions, and analyses that shall be used to assess whether its development program shall have adverse impacts to the Comprehensive Everglades Restoration Plan including the Southern Everglades Study.

The Applicant shall utilize information from the Integrated Delivery Schedule 2023 Update (<https://www.saj.usace.army.mil/Missions/Environmental/Ecosystem-Restoration/Integrated-Delivery-Schedule/>) to identify the components of the Southern Everglades Study component. A review of this information indicates the Southern Everglades Study components do not include any property near the City Park Site. The City Park project shall not impact the Southern Everglades Study and conversely, the Southern Everglades Study shall not impact the City Park project. The Applicant shall monitor the progress of the Southern Everglades Study.

7. Question 18 (Wastewater)

The Applicant shall answer Question 18 in the ADA form and, in addition, the Applicant shall coordinate with the Miami-Dade County Water and Sewer Department to develop a proposed water and sewer spine infrastructure network. The water and sewer demand shall be based on Miami-Dade County's "Schedule of Daily Rated Gallonage for Various Occupancy". The project shall evaluate the feasibility of greywater sources since the total project demand will be greater than 1 MGD, while identifying water use efficiency techniques in accordance with Miami-Dade County Code.

8. Question 20 (Solid Waste, Hazardous Waste, Medical Waste)

The Applicant shall answer Question 20 in the ADA form and shall coordinate and consult with Miami-Dade County to obtain the best available data.

9. Question 21 (Transportation)

A. GENERAL

The Applicant shall include the following items in its transportation analysis:

1. Existing year traffic counts (2023/2024) for the AM and PM peak hours, documenting the PM peak hour used as the DRI peak hour for analyses.
2. Existing year traffic conditions (2023/2024) of PM peak hour.
3. Build-out year traffic conditions (2036) without DRI of PM peak hour.
4. Build-out year traffic conditions (2036) with DRI of PM peak hour.

5. Study area defined by the five percent (5%) consumption rule.
6. Latest version of the adopted Southeast Regional Planning Model (SERPM).
7. 2026 Existing plus committed (E+C) network.
8. Select zone data sets for project traffic distribution/assignment.
9. Florida Department of Transportation (FDOT) Multimodal Transportation Site Impact Handbook 2024.
10. FDOT Multimodal Quality/Level of Service (MMQLOS) Handbook 2023.
11. FDOT Project Traffic Forecasting Handbook 2019.
12. FDOT Project Traffic Analysis Handbook 2021.
13. FDOT's Turns5/TMTool or other approved intersection turning movement forecasting application.
14. Synchro results based on the Highway Capacity Manual (HCM) methodology; the latest version of 12 shall be utilized unless otherwise justified.
15. ITE's Trip Generation Manual, 11th edition.
16. ITE's Trip Generation Handbook, 3rd edition.
17. If applicable, a Proportionate Share Calculation shall be provided for "project-related" off-site improvements based on a link-level study using directional, peak hour analysis for AM and PM.

B. TRANSPORTATION ASSESSMENT

1. The 954-acre City Park DRI project is adjacent to SR 997/Krome Avenue, about 4 miles west of Florida's Turnpike and SR 874/Don Shula Expressway and is southwest of Miami Executive Airport. SR 997/Krome Avenue, Florida's Turnpike, and SR 874/Don Shula Expressway are Strategic Intermodal System (SIS) facilities, while the Miami Executive Airport is a SIS General Aviation Reliever Airport. It is also noted that portions of SR 825/Lindgren Road and SW 120 Street immediately east of Miami Executive Airport are SIS connectors. Pursuant to Florida Statutes and Administrative Code, the Applicant shall evaluate affected SIS and transportation facilities of state importance to determine the impacts of the proposed development and if any improvements are needed to ensure the transportation system operates safely and efficiently.
2. The five percent (5%) consumption rule for the definition of the study area shall apply to a link-level study using directional, peak-hour analysis for PM. volumes on existing

highways adjacent to the site, including but not limited to SW 157th Avenue, SW 137th Avenue, SW 136th Street, SW 144th Street, SW 152nd Street, SW 120th Street, Krome Avenue, SR 874/Don Shula Expressway, and the Homestead Extension to Florida's Turnpike (HEFT).

3. All analyzed links shall be depicted on the map. Upon request of the agencies, all variables used in the road segment analysis shall be documented in responses to Question 21. These values include count station, historical Annual Average Daily Traffic (AADTs), K factors, truck (T) factors, level of service (LOS) standards service volumes, growth rates, and the maintaining agency.
4. Link-level study using directional, peak hour analysis for PM shall also be completed.
5. For facilities of state importance (e.g., SR 997/Krome Avenue, Florida's Turnpike, SR 874/Don Shula Expressway, and Strategic Intermodal System [SIS] connectors), the transportation impact analysis should include a link-level study using directional, peak hour analysis for PM traffic volume.
6. The LOS standards shall reference State or local policy, depending on the maintaining jurisdiction. Miami-Dade County comments: The LOS must be based on the County's LOS standards for both state and county roads.
7. Service volumes including peak hour, two-way service volumes a link-level study using directional, peak hour analysis for PM for roadways under study shall be compiled from FDOT MMQLOS Handbook and Miami-Dade County Concurrency Data.
8. Applicant shall coordinate with Miami-Dade County and FDOT to identify roadway context classifications prior to submitting the study. For non-state roadways, the service volume thresholds from the 2020 QLOS Handbook may be used, if the context classifications are not yet available.
9. It is understood that the Applicant is concurrently seeking approval from Miami-Dade County to expand the Urban Development Boundary to include the City Park DRI. As of right now, the development is outside of the Urban Development Boundary. The LOS thresholds should reflect urbanized conditions and adopted/target LOS for those facilities that are within the UDB expansion limits and within the Applicant's proposed UDB expansion via the companion CDMP Amendment application.
10. The Applicant shall confirm the viability of access points from SW 136th Street crossing the CSX tracks before starting the traffic impact analysis, as it would determine the actual site network to be evaluated.
11. The Applicant shall need approval for any proposed road closures.

12. SR 997/Krome Avenue is a controlled access facility in this area with a specific access management plan. Access connections to SR 997/Krome Avenue shall be evaluated, coordinated, and approved by FDOT.
13. The detailed site plan shall clearly show which roadways are public or private. The proposed typical section for section/half-section line roadways shall be approved by Miami-Dade County's Highway Division.
14. Intersection analysis shall be performed for PM peak hour (4-6 PM) corresponding to the peak hour volumes of the adjacent street.
15. The intersection LOS, delay, volume-to-capacity, and queue analysis shall be evaluated based on methodologies from the Highway Capacity Manual (HCM) using the Synchro software. The intersection operational analysis shall reflect PM peak-hour traffic conditions.
16. Interchange ramps shall be considered significant if the project contributes 200 or more PM peak hour trips. If the project significantly impacts ramps and/or intersections, the PM peak hour shall be evaluated to identify needed improvements caused by the project.
17. The Applicant shall not include capacity from the State Road 836 extension in its analysis.
18. The traffic study shall evaluate the need for dedicated left and/or right-turn lanes at the proposed project entrances.
19. For any new railroad crossing that is proposed, there is a requirement to shut down two existing railroad crossings.
20. At the railroad crossing locations, pavement markings, signings, and potential signal timing modifications shall be clearly indicated to safely accommodate the train based on its expected schedule.

C. DEVELOPMENT PROGRAM

1. If the application is approved, the Applicant may be required to conduct additional analysis of the project's impacts if full buildout does not occur by 2036.

D. EXISTING TRAFFIC CONDITIONS

1. The DRI traffic study shall analyze the existing roadway LOS, based on the latest available data which shall not be older than 2 years. Collection of AM and PM peak hour traffic counts may be necessary.

2. A list of proposed factors to be applied to each of the anticipated study area roadways shall be provided for review and approval. Such factors may include, but are not limited to, peak hour factor (PHF) and truck factor. The values of these factors should be consistent with the FDOT's Project Traffic Forecasting Handbook and other applicable state manuals.
3. Florida's Turnpike develops its own Standard K factors, and they are not the same as those reported via the Florida Traffic Online (FTO) website.

E. TRAVEL DEMAND MODELING

1. The Traffic Analysis Zone (TAZ) revisions; including boundaries, zonal data, and centroid connectors; shall be approved by the review agencies prior to the application for development approval (ADA) submittal. It is recommended that a meeting be reconvened with the developer and review agencies to facilitate the discussions on accesses/connections, prior to the ADA submittal.
2. The E+C network shall be updated within a 10-mile radius of City Park DRI to reflect committed improvements to Year 2026. The TAZ/MAZ input data shall be based on interpolated data from the latest adopted datasets for the analysis year.
3. All development's connections to the existing roadway network shall be reviewed and approved by the review agencies. Connections shall be in compliance with Miami-Dade County's Comprehensive Development Master Plan (CDMP)'s policies of providing roadway and neighborhood connectivity while maintaining the residential neighborhoods' quality of life.
4. Adjustments to the network to reasonably reflect the City Park Master Concept Plan (MCP) may include certain proposed roadways and connections to the external road network. Such adjustments are subject to review and approval by review agencies. The ADA submittal shall present the final Master Concept Plan with the proposed external access points.

F. FUTURE TRAFFIC WITHOUT DRI

Growth Rate Calculation

1. Historical traffic count data from stations located within three miles of the project's boundary may be utilized to determine the historical growth trends. Counts from the years 2020 and 2021 shall be excluded from the calculations. Based on this requirement,

historical count data from 2012 – 2024 (excluding years 2020 and 2021 and, if 2024 is available) will be used.

2. A minimum linear growth rate of 0.5% annually shall be used if the historical growth rate is less than 0.5%.
3. The historical annual growth in the area shall be applied to the existing traffic volumes to determine background traffic volumes for the buildout year.
4. Applicant shall use an areawide growth rate analysis based on previously submitted traffic count data, which will be resubmitted with the ADA. The areawide growth rate within two miles of the project shall be 0.7% per year, and outside of two miles of the project shall be 1.4% per year. For SR 997/Krome Avenue, the Applicant shall use the growth rates in Table 1:

Table 1

Roadway	From	To	Recommended Growth Rate
Krome Avenue	north of	104th St	1.94%
	104th St	184th St	1.35%
	184th St	south	1.35%

Committed Projects and Developments

1. A list of committed infrastructure improvements and committed development projects expected to be incorporated into the transportation analysis shall be provided for review and approval.
2. Committed roadway improvement is defined by those facilities that are funded for construction and listed in the first three years of the Miami-Dade Capital Improvement Plan and in the FDOT Work Program.

Future Background Traffic Conditions Intersection Analysis

1. Future intersection turning movement volumes shall be developed consistent with the methodologies utilized in FDOT's Project Traffic Forecasting Handbook.
2. Future year turning movement projections for background conditions shall be developed using TMTTool/Turn5 with the existing turning movement volumes and the approved areawide growth rates, except for the separate growth rates for SR 997/Krome Avenue.

G. DEVELOPMENT TRAFFIC

The City Park DRI development traffic shall be determined using the hybrid manual-model approach. The trip generation shall be from the ITE's Trip Generation Manual, and the distributions shall be initiated from the travel demand forecasting model.

Trip Generation

1. The Institute of Transportation Engineers' Trip Generation Manual or its web application shall be used to determine trip generation.
2. The Trip Generation Handbook's internal capture percentages for the PM peak period shall be used to estimate the project's trip generation, consistent with accepted traffic impact analysis procedures.
3. Since SR 997/Krome Avenue is designated as a SIS facility and is well known for the volume of trucks using it, FDOT is requesting that the Applicant utilize a daily Truck factor of 13.7% and a peak hour Truck factor of 7.0% for SR 997/Krome Avenue in its DRI analyses. These values were developed and approved by FDOT for the SR 997/Krome Avenue PD&E Study from SW 136 Street to Okeechobee Road. They represent the Department's estimate of truck activity along this important freight corridor.
4. The intrazonal/mixed-use trip capture shall be estimated based on methodologies described in ITE's *Trip Generation Handbook*. While the limitations of the ITE Trip Generation Handbook are recognized, the analysis will begin with the recommended internalization percentages provided in the handbook, and justification shall be provided for the percentages for pairs where data is not available. Additionally, the 39.5% internalization between schools and residential communities is based on the current intensities outlined in the Applicant's June 27, 2024, submittal. If the residential and/or school intensities change, the internal capture rate between these two uses may need to be adjusted accordingly. All assumptions regarding internal capture rates shall be documented and subject to review and approval by review agencies.
5. Total pass-by trips generated by retail uses and internalization trips among all land shall be estimated based on average rates from the ITE's Trip Generation Handbook and the FDOT Transportation Site Impact Handbook. The pass-by trips shall be limited to 10% of the adjacent street traffic's volume.
6. Miami-Dade County shall only accept multimodal reduction based on Census data as outlined in the County's Traffic Impact Study Standard Methodology. Alternatively, the Applicant may use different mode share data related to commuters' transit and bike-ped usage and justify the data by committing to construct adequate transit and bike-ped

infrastructure in the traffic study, in the ADA, and in the DRI DO conditions, to support the multi-modal reduction rates for City Park's development program.

Trip Distribution/Assignment

1. Project traffic distributions will be established based on the most current TPO run of SERPM.
2. The select zone analysis shall be used to establish the City Park DRI's initial external trip distribution/assignment. The final project trip distribution/assignment is subject to review and approval by review agencies.
3. Vehicular trips may not be distributed to the proposed SR 836 South Extension/Kendall Parkway as the capacity of the SR 836 extension is not available for the use of any new development.
4. Internal circulation within the site shall be clearly justified and shown on a conceptual site plan.
5. The estimated net new trip generation shall be applied to the approved distribution percentages to determine the DRI trip assignments.

H. FUTURE TOTAL TRAFFIC CONDITIONS

1. Total future traffic with City Park DRI shall be the sum of background traffic volumes and the project trip assignment.
2. Florida's Turnpike Enterprise has developed forecast methodology and traffic volume trends forecasts for the Turnpike facilities. These projections shall be utilized in the analysis of the Turnpike facilities in the vicinity of the project.

Roadway	From	To	Recommended Minimum Growth Rate
Turnpike (SR 821)	Quail Roost Drive	Don Shula Expressway	2.0%

3. The segment analysis shall be submitted and reviewed to establish the roadways that are significantly impacted by the DRI. When the segment analysis is found sufficient, the list of intersections required to be analyzed shall be formulated at that time.

Future Total Traffic Conditions Intersection Analysis

1. Major intersections located along significantly impacted external roadways shall be considered for intersection analysis. The list of intersections to be included in the analysis shall be finalized following acceptance of the significantly impacted road network by the review agencies.
2. Project traffic PM peak hour intersection volumes shall be added to the future intersection turning movement volumes without the project based on approved trip distribution percentages. All documentation associated with the development of the intersection turn volumes shall be provided.
3. Intersection improvements shall be identified when an overall intersection or approach does not meet the adopted LOS standard and/or exceed volume-to-capacity ratios of 1.0; or as requested by the review agencies, individual turning movements that do not meet the adopted LOS standard and/or exceed volume-to-capacity ratios of 1.0.

I. COST ESTIMATE AND PROPORTIONATE SHARE CALCULATION

1. The Applicant shall identify funding for the infrastructure improvements to support the proposed multimodal reductions in trip generation.
2. The source and methodology for estimating project costs shall be clearly identified. A generous amount for contingency shall be included to account for the labor and materials shortage, resulting in an increase in cost estimates. Resilience measures shall also be taken into consideration.
3. For the separate but concurrent Miami-Dade County OMP amendment process, the proportionate share formula outlined in Section 163.3180 of the Florida Statutes is based on the peak hour two-way traffic volumes, using information from the County's concurrency database, FDOT's MMQLOS Handbook, and the most recently collected/available traffic data. An additional inflation rate factor, such as the "Consumer Price Index US City Average as published by the U.S. Bureau of Labor Statistics" (CPI), shall be considered.

II. Question 22 (Air)

Air quality testing shall occur after transportation planning and modeling is complete.

- III. Question 23 (Hurricane Preparedness)** The Applicant shall answer Question 20 in the ADA form, and to the extent necessary, use the SFRPC's regional evacuation studies, which are available as linked: <https://portal.floridadisaster.org/preparedness/RES/Studies/SitePages/RES.aspx#SFRPC> The Applicant will provide the SFRPC the appropriate data, since the

applicable evacuation models must be conducted by SFRPC representatives. If the TIME model cannot be run due to obsolescence or another reason, then the SFRPC may use an alternative model which is mutually acceptable to the SFRPC and the Applicant.

13. Question 24 (Housing)

City Park proposal is a wide range of non-residential uses, creating demand for housing among a broad spectrum of households potentially outside of the project site.

The Applicant noted its intent to (1) include the workforce housing required by Miami-Dade County as multi-family units and (2) contribute to Miami-Dade County's Affordable Housing Trust Fund in the manner contemplated by the Miami-Dade County Code. The Applicant also noted they will consider providing land for affordable housing, perhaps to an affordable housing developer, and were not able to answer if the workforce housing will be priced from 60% to 140% of the area median income.

The Applicant indicated they shall assess available housing supply with owner-occupied housing based upon data from the Miami-Dade County Property Appraiser and renter data based upon Costar. The Applicant also noted substandard housing shall be removed from the analysis.

The East Central Florida Regional Planning Council Housing Methodology: A Methodology for Assessing the Affordable Housing Impact of Developments of Regional Impact (June 1999) may be used; however, the following updates are required:

- The latest data from the American Community Survey regarding single- and multi-worker households by income level should be used replacing Table 2.
- The Florida Department of Commerce for Miami-Dade County NAICS employment and wage data should be used to ensure employment, wage, and salary estimates conform with the data for Miami-Dade County or the development's geographic subarea.
- Data from Miami-Dade Property Appraiser regarding ad valorem assessments as well as data specific to the development's geographic subarea of Miami-Dade County regarding property and casualty (including flood insurance, as applicable) and private mortgage data should be used to calculate the affordability of owner-occupied housing.
- The Applicant could forgo estimating available housing supply since data from the University of Florida's Shimberg Center for Housing Studies indicates Miami-Dade County has a housing supply deficit for very-low-, low-, and moderate-income residents. The Applicant shall estimate housing demand by calculating direct (on-site, permanent, non-construction employment by the North American Industry Classification System [NAICS]). It should be noted Miami-Dade County requirements

for CDMP amendments and zoning applications will specify how affordable demand is to be estimated, for those applications.

- The Pre-Application materials note “the housing supply area for the City Park DRI shall be based upon peak hour drive times from the development’s core to surrounding employment centers.” The housing supply area should be, per the ECFRPC Methodology, actual driving distance from the primary entrance of the development to the housing unit and projected actual driving distance and not as a straight radius from the center of the project or its boundaries”.

14. Question 25 (Police and Fire Protection)

Applicant shall coordinate and consult with Miami-Dade County and any other appropriate providers to respond to this ADA Question.

15. Question 26 (Recreation and Open Space)

Applicant shall answer Question 26 of the ADA form and coordinate and consult with Miami-Dade County regarding data sources, methodology, assumptions, and analyses to respond to this question.

16. Question 27 (Education)

The proposed development must obtain a school concurrency determination certificate prior to obtaining a development order for the development. Thus, the Applicant shall provide Miami-Dade County with the information for the County to request a school concurrency analysis and a determination review from Miami-Dade County Public Schools (MDCPS). The information shall be consistent with the requirements of Amended and Restated Interlocal Agreement for Public School Facility Planning in Miami-Dade County. The Applicant shall provide mitigation consistent with the requirements of Amended and Restated Interlocal Agreement for Public School Facility Planning in Miami-Dade County for any adverse impacts for needed capacity.

The Applicant shall set aside three sites within the development for the construction of the needed school capacity. The Applicant shall offer the sites to Miami-Dade County Public Schools (MDCPS) filled to subgrade, fenced, and with the required infrastructure. Additionally, the location of the three sites shall comply with the County’s Educational Element requirements. The Applicant was asked to consider hardening facilities for use as evacuation shelters. It was noted that how the Applicant proposes to address school-related traffic shall be discussed during the Air and Transportation Section of the Pre-Application Conference.

If the school sites are not developed as schools, the sites will be developed as park and recreation areas, and/or with components of the approved development program.

17. Question 29 (Energy)

In Miami-Dade County, buildings account for more than 40% of greenhouse gas emissions. Land Use Element Objective LU-IO of the Comprehensive Development Master Plan (CDMP) encourages development patterns that reduce greenhouse gas emissions by increasing energy conservation and sourcing a portion of energy from solar among other strategies. The subject application intends to add significant urban development to the proposed site which shall increase energy use, emissions, and the Urban Heat Island effect locally and throughout Miami-Dade County. Further, the reduction of building energy use in Miami-Dade County is a key approach of the County's Climate Action Strategy, and the use of ultra-low or net-zero energy buildings is a specific recommended action.

Applicant shall:

- a. Address how the proposed development shall employ energy conservation as well as reduce its greenhouse gas emissions and Urban Heat Island effect. In addition, the Applicant's response should address consistency with Miami-Dade County's CDMP and Climate Action Strategy.
- b. With regards to urban heat, the 2021 Miami-Dade Urban Tree Canopy Assessment clearly identifies important relationships between urban development and heat. These include a clear pattern of increasing urban heat with increasing development. For example, an up to 17 degrees Fahrenheit (degF) difference in temperature has been observed between the most and least developed areas of Miami-Dade County. Changes in temperature are most drastic with land use changes similar to this proposed development, i.e., conversion of habitat/wooded areas to any other class of land use and conversion of pervious surfaces to impervious (up to 6-7.5 deg F increase in surface temperature). The application shall address strategies around these issues related to high-performance building designs, energy efficiency, renewable energy, heat mitigation, or emission reduction.
- c. Compared to high-density centers, suburban areas have larger homes and buildings, longer distances between services, fewer public transportation options, and features that lead to a more carbon-intensive lifestyle. Locating new development away from existing major transit corridors is also likely to increase the transportation emissions from cars and trucks. The Applicant shall address how these trips compare to existing traffic patterns, and model impacts to local air quality as required by the Air Quality Uniform Standard Rule, 73C-40.046, FAC.
- d. Expanding development shall replace undeveloped land-use areas with many impervious surfaces and grey infrastructure which are likely to conduct and trap heat, further elevating issues of extreme urban heat and urban heat island effects in the area. As stated

in section LU-IOI of the CDMP, Miami-Dade County shall consider strategies to reduce the urban heat island effect which may include requirements for high albedo surfaces, porous pavement, tree canopy, and cool roofs. The Applicant should address how the development shall reduce the urban heat island effect.

- e. The Applicant shall consider how the development would support EV fleets and EV personal vehicles.

18. Question 30 (Historical and Archaeological Sites)

It was noted the Applicant may need to conduct a general cultural resource study. The Applicant noted that they have contacted the Florida Department of State's Division of Historical Resources regarding the site.

Applicant shall coordinate and consult with the Florida Department of State's Division of Historical Resources to obtain a letter that the project site is not listed in the Florida Master Site File. In addition, the Applicant shall employ, if directed by the Division of Historical Resources, all data sources, methodology, assumptions, and analyses to respond to this question.

19. Question 39 (Sea Level Rise – Additional Question)

Applicant shall identify proposed public infrastructure on-site, and immediately adjacent, vulnerable to sea level rise over the 50-year planning horizon utilizing the Unified Sea Level Rise Projection Report (2019) developed by the Southeast Florida Regional Climate Change Compact, as incorporated in Chapters 24 and 11C, Miami-Dade County Code.

20. Question 40 (Agriculture -- Additional Question)

ADA Form Part 2 (Consistency with Comprehensive Plans), Section D states: "Describe how the proposed development shall meet goals and policies contained in the State Comprehensive Plan (Chapter 187, F.S.), including, but not limited to, the goals addressing the following issues: housing, water resources, natural systems and recreational lands, land use, public facilities, transportation, and **agriculture**. [Emphasis added]

The policies of the County's Comprehensive Development Master Plan (CDMP) have long supported agriculture as a viable economic use of suitable lands. Due to the importance of the agricultural industry to Miami-Dade County, the Applicant shall analyze, using "Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County, Florida" (October 2023), whether its proposed development program shall adversely impact agricultural lands and production.

Applicant shall:

- a. Detail how its proposed development will not infringe on equipment movement for agricultural properties within the area.
- b. Provide methodologies, assumptions, data sources, and analyses used to analyze SERPM the implications of converting the project site from Agriculture to other uses.
- c. Include a conceptual stormwater master plan that assesses existing, planned development and adjacent land uses including agricultural and other uses. Stormwater management was modeled by DERM with the project site as agriculture. The Applicant should address how the development program would enhance or degrade regional drainage.

The Applicant shall prepare a conceptual stormwater management plan for the overall development utilizing the following data sources, methodologies, and assumptions.

- Utilize Miami-Dade County's Average October Water Table and Miami-Dade County Flood Criteria Maps for design groundwater elevation and county flood criteria.
- Utilize SFWMD ERP Applicant's handbook for total rainfall depth for key design storms.
- SCS Design Methodology to estimate total runoff volume generated by the development.
- Utilize Harper Methodology, as developed with FDEP, and the BMP Trains software to determine the pre-development vs. post-development nutrient loading concentrations.
- Assume a 2-foot rise in groundwater elevations due to sea-level rise as currently proposed by Miami-Dade County in the Stormwater Management Program Master Plan Update (FY2021) prepared by Miami-Dade County and GIT Consulting, LLC.

ATTACHMENT 1

SOUTH FLORIDA WATER MANAGEMENT DISTRICT PERMITS

The types of permits that may be needed from South Florida Water Management District are listed below. Also included is a brief listing of projects that require permits, links to the SFWMD Website for more detailed information, and contact information.

- **Environmental Resource Permits**

This type of permit is or may be needed for:

- > Dredging and filling in wetlands or surface waters
- > Constructing flood protection facilities
- > Providing storm water containment and treatment
- > Site grading
- > Other activities affecting state waters

Website Link: [Environmental Resource Permits | South Florida Water Management District \(sfwmd.gov\)](https://www.sfwmd.gov/doing-business-with-us/permits/environmental-resource-permits)

Contacts:

- > Wetlands and State Lands: Barb Conmy - bconmy@sfwmd.gov - (561) 682-6937
- > Surface Water/Engineering & Variances and Above Ground Impoundments: Dustin Wood - duwood@sfwmd.gov - (561) 682-2624

- **Consumptive Water Use Permits**

A consumptive water use permit allows the holder to use water for:

- > public supply (drinking water)
- > agricultural and nursery plant irrigation
- > golf course irrigation
- > commercial use
- > dewatering/mining activities
- > power

Website link: [Consumptive Water Use Permits | South Florida Water Management District \(sfwmd.gov\)](https://www.sfwmd.gov/doing-business-with-us/permits/consumptive-water-use-permits)

Contact: Nicholas Vitani – nvitani@sfwmd.gov - (561) 682-2133

- **Well Construction Permits**

A Well Construction Permit is needed for:

- > New wells
- > Repair or modification of an existing well
- > Abandonment of a well
- > Test wells
- > Monitor wells
- > Test holes that will be converted to a water use well

Website link: <https://www.sfwmd.gov/doing-business-with-us/permits/well-construction>

Contact: wells@sfwmd.gov or (561) 682-6930

- **Right of Way (ROW) Permits**

A ROW Permit is a revocable license that authorizes the use of the District's right of way.

Website link: [Right of Way Occupancy Permits \(ROW Permits\) | South Florida Water Management District \(sfwmd.gov\)](https://www.sfwmd.gov/doing-business-with-us/permits/right-of-way-occupancy-permits)

Contact: [ROW Field Representatives 8-3-22.docx \(sfwmd.gov\)](https://www.sfwmd.gov/doing-business-with-us/permits/row-field-representatives)