City Park
Q21

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SEPTEMBER 9, 2025

DPA Project #21135

21. Transportation

A. Using Map J or a table as a base, indicate existing conditions on the highway network within the study area (as previously defined on Map J), including AADT, peak-hour trips, directional traffic split, levels of service and maximum service volumes for the adopted level of service (LOS). Identify the assumptions used in this analysis, including "K" factor, directional "D" factor, facility type, number of lanes and existing signal locations. (If levels of service are based on some methodology other than the most recent procedures of the Transportation Research Board and FDOT, this should be agreed upon at the pre-application conference stage.) Identify the adopted LOS standards of the FDOT, appropriate regional planning council, and local government for roadways within the identified study area. Identify what improvements or new facilities within this study area are planned, programmed, or committed for improvement. Attach appropriate excerpts from published capital improvements plans, budgets and programs showing schedules and types of work and letters from the appropriate agencies stating the current status of the planned, programmed and committed improvements.

1. Project Description, Scale of Development and Land Use

City Park is a proposed master-planned development encompassing approximately 954 acres located in unincorporated southwest Miami-Dade County, bounded by SW 136th Street (Howard Drive) to the north, SW 152nd Street (Coral Reef Drive) to the south, SW 162nd Avenue to the east, and Krome Avenue (SW 177th Avenue) to the west (the "Subject Property"). The project is strategically positioned to support the County's long-term objectives for growth management, economic development, infrastructure efficiency, and environmental resilience. The DRI is proposed for development within a single phase with build out occurring in the year 2036. See Map J-A1 for the project location.

2. Scale of Development and Land Use

The proposed development program for City Park is shown in **Table 21.A.1**, below.

Table 21.A.1
City Park DRI Development Program

Land Use	Scale of Development
Residential	
- **Single Family Detached**	1,029 du
- **Multifamily Low-Rise**	4,532 du
- **Multifamily Mid-Rise**	2,239 du
Retail	749,153 sq.ft.
Industrial Warehousing	892,484 sq.ft.
Office	500,000 sq.ft.
Elementary School	1,011 students
Middle School	1,222 students
High School	1,630 students
Park	56 acres

3. Methodology Assumptions and Guidelines

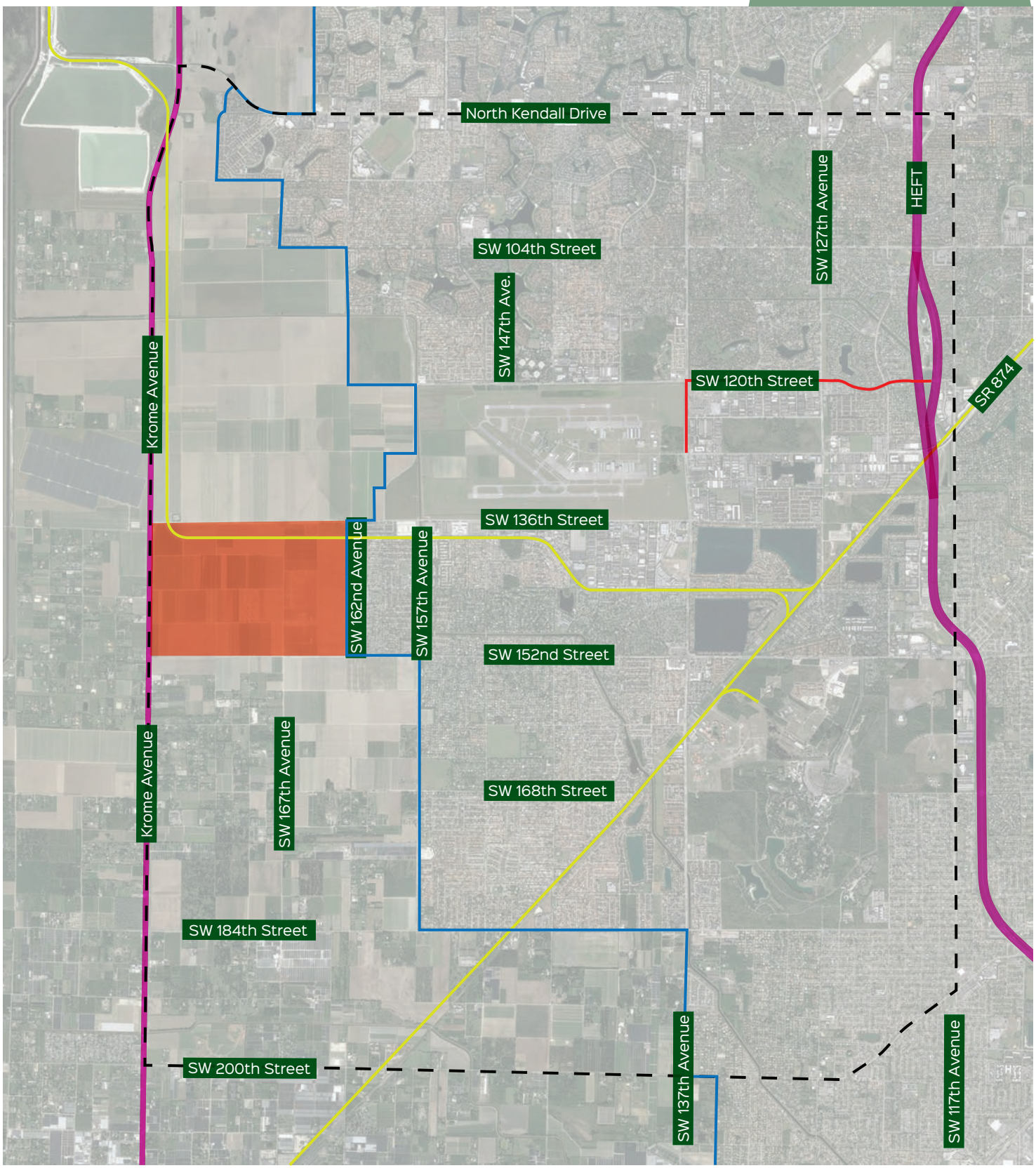
The transportation study methodology is outlined in the May 8, 2025 Agreement to Delete document included in Appendix 21-1. The study methodology is based upon standard practices for traffic impact studies, the land use characteristics of the project, and the prescribed methodologies for responding to Question 21 as established by the various agencies having jurisdiction to review the DRI. Unless otherwise stated, this transportation study will generally adhere to the DRI methodology guidelines, policies and standards listed below:

1. Florida Department of Transportation (FDOT) Multimodal Transportation Site Impact Handbook 2024.
2. FDOT Multimodal Quality/Level of Service (Q/LOS) Handbook 2023.
3. FDOT Project Traffic Forecasting Handbook 2019.
4. FDOT Project Traffic Analysis Handbook 2021.
5. FDOT's Turns5/TMTool or other approved intersection turning movement forecasting application.
6. Synchro results based on the Highway Capacity Manual (HCM) methodology; the latest version of 12 shall be utilized unless otherwise justified.
7. ITE's Trip Generation Manual, 11th edition.
8. ITE's Trip Generation Handbook, 3rd edition.

4. Traffic Impact Study Area

The traffic impact study area for a DRI is defined by Rule 73C-40.045, F.A.C. The five percent (5%) consumption rule shall apply to a segment-level study using directional, peak-hour analysis for the PM peak hour 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, SW 177th Avenue (Krome Avenue), SR 874/Don Shula Expressway, and the Homestead Extension to Florida's Turnpike (HEFT).

Map J-A1 illustrates the preliminary traffic impact study area which extends to SW 88th Street on the north, SW 117th Avenue on the east, SW 200th Street on the south, and SW 177th Avenue on the west. Map J-A2 illustrates the existing lane geometry for the roadways within this traffic impact study area. Map J-A3 highlights those regionally significant roadway segments where project trips anticipated from the build out of the DRI are equal to or exceed 5.0% of the adopted PM peak hour maximum service volume pursuant to Rule 73C-40.045, F.A.C. The calculations performed to determine compliance with this 5.0% rule are provided in Table 21.A.2, where project trip assignments are established using the latest version of the adopted Southeast Regional Planning Model (SERPM). Table 21.A.2 also includes the existing lane geometry and the adopted level of service standards within the preliminary traffic impact study area.



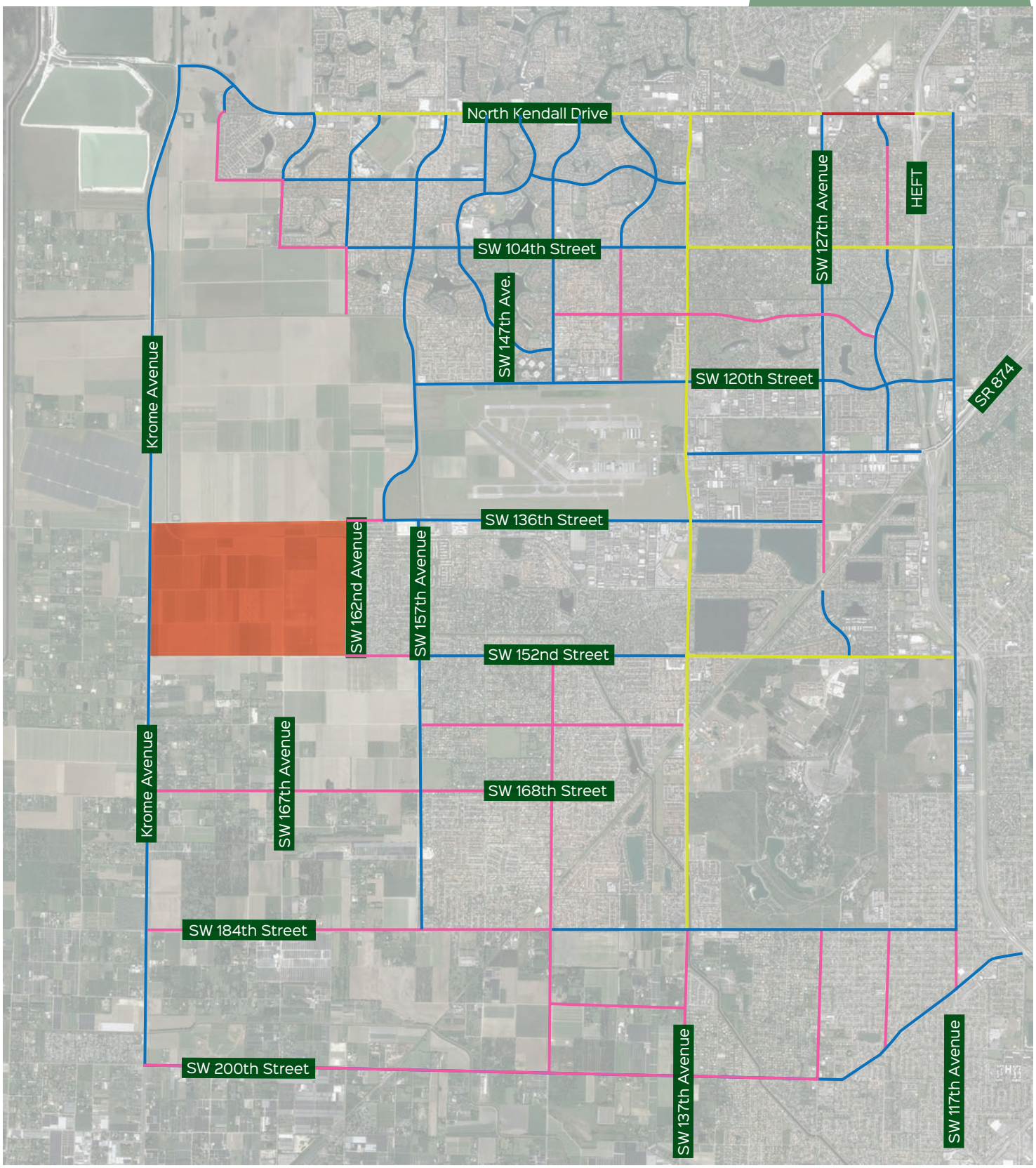
Project Location

Map J-A1

Location Map

Preliminary Traffic impact Study Area
Urban Development Boundary
Existing Rail Lines
SIS Roadways
SIS Connector

NORTH
MAP NOT TO SCALE



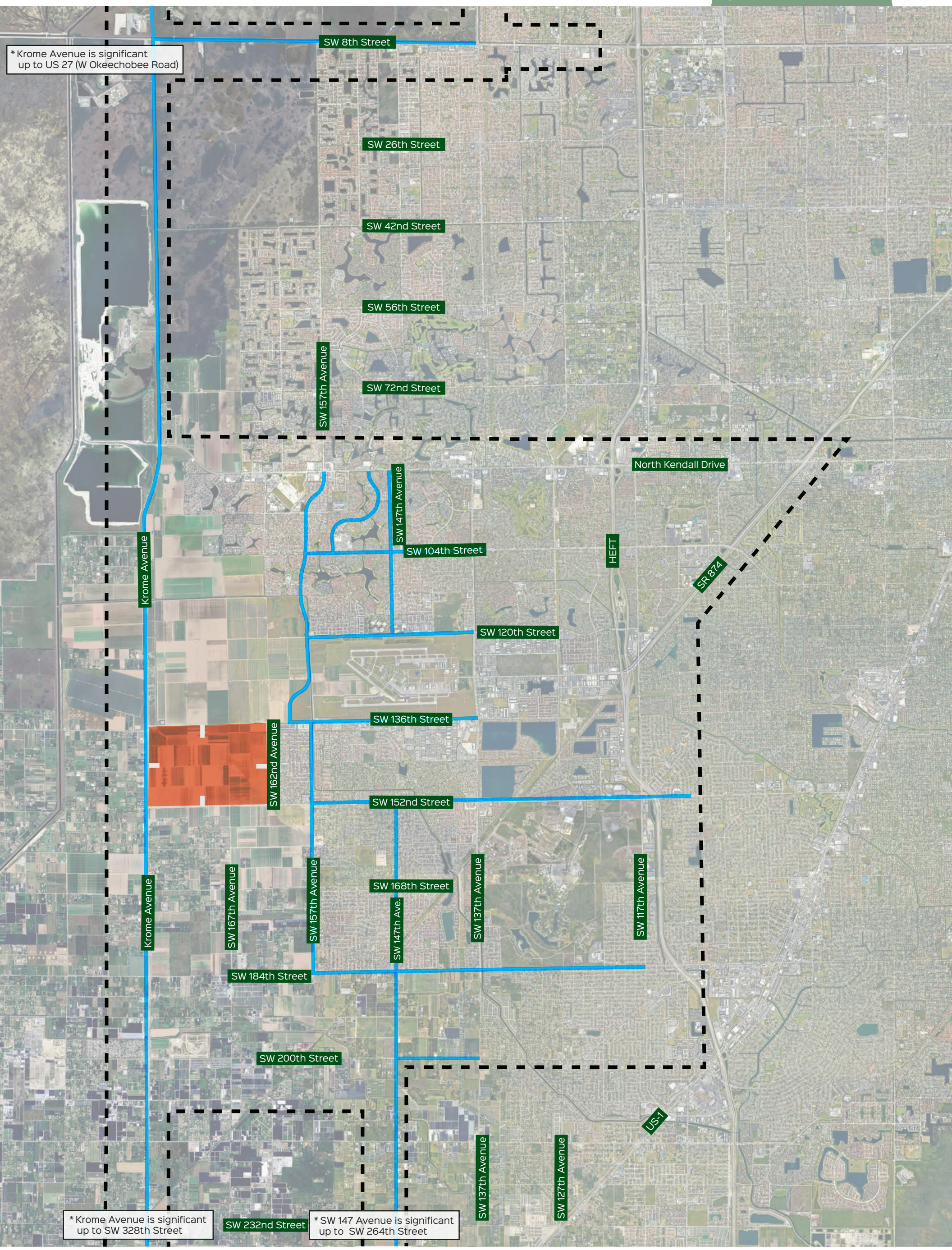
Project Location

8 Lanes
6 Lanes
4 Lanes
2 Lanes

Map J-A2

Existing Lane Geometry

NORTH
MAP NOT TO SCALE



Project Location

Map J-A3

Final Traffic Impact Study Area Based Upon The 5% Rule

NORTH
MAP NOT TO SCALE

TABLE 21.A.2
Traffic Impact Study Area Determination Based Upon 5% Rule

Roadway Segments	Direction	Existing Number of Lanes	Adopted LOS Standard [1]	Project Two-Way Distribution Percent [2]	Directional Split Percentage [3]	Total PM Peak Hour Project Trips [4] 4,817	Maximum Service Volume [5] (MSV)	Project Trips as Percent of MSV	Project Trips ≥ 5% (Yes / No)
SW 8 Street									
SW 187 Avenue to SW 177 Avenue	EB	1LU	C	0.50%	0.26%	12	430	2.79%	No
	WB	1LU	C		0.24%	12	430	2.79%	No
SW 177 Avenue to SW 157 Avenue	EB	2LD	C	8.00%	3.84%	185	1,700	10.88%	Yes
	WB	2LD	C		4.16%	200	1,874	10.67%	Yes
SW 157 Avenue to SW 137 Avenue	EB	3LD	E+20	8.00%	3.84%	185	3,578	5.17%	Yes
	WB	3LD	E+20		4.16%	200	3,408	5.87%	Yes
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	3.00%	1.44%	70	3,767	1.86%	No
	WB	3LD	E+20		1.56%	75	3,767	1.99%	No
SW 127 Avenue to HEFT	EB	3LD	E	2.00%	0.96%	46	3,140	1.47%	No
	WB	3LD	E		1.04%	50	3,140	1.59%	No
HEFT to SW 107 Avenue	EB	3LD	D	1.00%	0.48%	23	2,810	0.82%	No
	WB	3LD	D		0.52%	25	2,810	0.89%	No
SW 88 Street									
SW 177 Avenue to SW 167 Avenue	EB	2LD	D	1.50%	0.72%	35	1,943	1.80%	No
	WB	2LD	D		0.78%	37	1,943	1.90%	No
SW 167 Avenue to SW 157 Avenue	EB	3LD	E+20	1.00%	0.48%	23	3,780	0.61%	No
	WB	3LD	E+20		0.52%	25	3,780	0.66%	No
SW 157 Avenue to SW 147 Avenue	EB	3LD	E+20	1.00%	0.48%	23	3,767	0.61%	No
	WB	3LD	E+20		0.52%	25	3,780	0.66%	No
SW 147 Avenue to SW 137 Avenue	EB	3LD	D	2.00%	0.96%	46	3,098	1.48%	No
	WB	3LD	D		1.04%	50	2,951	1.69%	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	1.50%	0.72%	35	3,588	0.98%	No
	WB	3LD	E+20		0.78%	37	3,956	0.94%	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	1.50%	0.72%	35	4,423	0.79%	No
	WB	4LD	E+20		0.78%	37	4,644	0.80%	No
SW 104 Street									
SW 157 Avenue to SW 147 Avenue	EB	2LD	E+20	6.00%	2.88%	139	2,257	6.16%	Yes
	WB	2LD	E+20		3.12%	150	2,257	6.65%	Yes
SW 147 Avenue to SW 137 Avenue	EB	2LD	E+20	6.00%	2.88%	139	2,257	6.16%	Yes
	WB	2LD	E+20		3.12%	150	2,257	6.65%	Yes
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	4.50%	2.16%	104	3,348	3.11%	No
	WB	3LD	E+20		2.34%	113	3,348	3.38%	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	4.00%	1.92%	93	3,348	2.78%	No
	WB	3LD	E+20		2.08%	100	3,348	2.99%	No
SW 117 Avenue to SR 874	EB	3LD	E+20	3.00%	1.44%	70	3,348	2.09%	No
	WB	3LD	E+20		1.56%	75	3,348	2.24%	No
SW 120 Street									
SW 157 Avenue to SW 147 Avenue	EB	2LD	D	11.00%	5.28%	254	1,800	14.11%	Yes
	WB	2LD	D		5.72%	276	1,800	15.33%	Yes
SW 147 Avenue to SW 137 Avenue	EB	2LD	D	4.50%	2.16%	104	1,890	5.50%	Yes
	WB	2LD	D		2.34%	113	1,800	6.28%	Yes
SW 137 Avenue to SW 122 Avenue	EB	2LD	D	3.00%	1.44%	70	1,800	3.89%	No
	WB	2LD	D		1.56%	75	1,800	4.17%	No
SW 122 Avenue to SW 117 Avenue	EB	2LD	D	2.00%	0.96%	46	1,467	3.14%	No
	WB	2LD	D		1.04%	50	1,540	3.25%	No
SW 136 Street									
SW 157 Avenue to SW 137 Avenue	EB	2LD	D	7.00%	3.36%	162	1,467	11.04%	Yes
	WB	2LD	D		3.64%	175	1,467	11.93%	Yes
SW 137 Avenue to SW 127 Avenue	EB	2LD	D	1.00%	0.48%	23	1,467	1.57%	No
	WB	2LD	D		0.52%	25	1,467	1.70%	No
SW 152 Street									
SW 157 Avenue to SW 137 Avenue	EB	2LD	E+20	20.00%	9.60%	462	1,881	24.56%	Yes
	WB	2LD	E+20		10.40%	501	1,975	25.37%	Yes
SW 137 Avenue to SW 127 Avenue	EB	3LD	D	15.00%	7.20%	347	2,854	12.16%	Yes
	WB	3LD	D		7.80%	376	2,718	13.83%	Yes
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	14.00%	6.72%	324	3,348	9.68%	Yes
	WB	3LD	E+20		7.28%	350	3,348	10.45%	Yes
SW 117 Avenue to SW 112 Avenue	EB	2LD	E+20	7.00%	3.36%	162	2,370	6.84%	Yes
	WB	2LD	E+20		3.64%	175	2,370	7.38%	Yes
SW 112 Avenue to US-1	EB	2LD	E+20	5.00%	2.40%	116	2,672	4.34%	No
	WB	2LD	E+20		2.60%	125	2,545	4.91%	No
SW 184 Street									
SW 177 Avenue to SW 157 Avenue	EB	1LU	C	0.50%	0.24%	12	598	2.01%	No
	WB	1LU	C		0.26%	12	784	1.53%	No
SW 157 Avenue to SW 147 Avenue	EB	1LU	D	7.00%	3.36%	162	792	20.45%	Yes
	WB	1LU	D		3.64%	175	634	27.62%	Yes
SW 147 Avenue to SW 137 Avenue	EB	2LD	D	5.00%	2.40%	116	1,800	6.44%	Yes
	WB	2LD	D		2.60%	125	1,800	6.94%	Yes
SW 137 Avenue to SW 117 Avenue	EB	2LD	D	5.00%	2.40%	116	1,800	6.44%	Yes
	WB	2LD	D		2.60%	125	1,800	6.94%	Yes
SW 117 Avenue to US-1	EB	2LD	D	3.00%	1.44%	70	1,890	3.70%	No
	WB	2LD	D		1.56%	75	1,800	4.17%	No

TABLE 21.A.2
Traffic Impact Study Area Determination Based Upon 5% Rule

Roadway Segments	Direction	Existing Number of Lanes	Adopted LOS Standard [1]	Project Two-Way Distribution Percent [2]	Directional Split Percentage [3]	Total PM Peak Hour Project Trips [4] 4,817	Maximum Service Volume [5] (MSV)	Project Trips as Percent of MSV	Project Trips ≥ 5% (Yes / No)
SW 200 Street/Quail Roost									
SW 177 Avenue to SW 147 Avenue	EB	1LU	D	1.00%	0.48%	23	730	3.15%	No
	WB	1LU	D		0.52%	25	730	3.42%	No
SW 147 Avenue to SW 137 Avenue	EB	1LU	C	1.00%	0.48%	23	430	5.35%	Yes
	WB	1LU	C		0.52%	25	430	5.81%	Yes
SW 137 Avenue to SW 127 Avenue	EB	1LU	E	1.00%	0.48%	23	1,250	1.84%	No
	WB	1LU	E		0.52%	25	1,313	1.90%	No
SW 127 Avenue to SR 821/HEFT	EB	2LD	E	1.00%	0.48%	23	2,100	1.10%	No
	WB	2LD	E		0.52%	25	2,100	1.19%	No
SW 177 Avenue									
US 27 to SW 2 Street	NB	2LD	C	5.50%	2.64%	127	2,390	5.31%	Yes
	SB	2LD	C		2.86%	138	2,510	5.50%	Yes
SW 2 Street to SW 8 Street	NB	2LD	C	6.00%	2.88%	139	2,390	5.82%	Yes
	SB	2LD	C		3.12%	150	2,510	5.98%	Yes
SW 8 Street to SW 12 Street	NB	2LD	C	14.50%	6.96%	335	2,510	13.35%	Yes
	SB	2LD	C		7.54%	363	2,390	15.19%	Yes
SW 12 Street to SW 88 Street	NB	2LD	C	14.50%	6.96%	335	2,510	13.35%	Yes
	SB	2LD	C		7.54%	363	2,510	14.47%	Yes
SW 88 Street to SW 136 Street	NB	2LD	C	16.00%	7.68%	370	2,510	14.74%	Yes
	SB	2LD	C		8.32%	401	2,510	15.98%	Yes
SW 136 Street to SW 200 Street	NB	2LD	C	14.00%	7.28%	350	2,510	13.95%	Yes
	SB	2LD	C		6.72%	324	2,510	12.91%	Yes
SW 200 Street to SW 232 Street	NB	2LD	C	12.00%	6.24%	301	2,510	11.99%	Yes
	SB	2LD	C		5.76%	277	2,510	11.04%	Yes
SW 232 Street to SW 288 Street	NB	2LD	C	7.00%	3.64%	175	2,510	6.97%	Yes
	SB	2LD	C		3.36%	162	2,510	6.46%	Yes
SW 288 Street to SW 312 Street	NB	2LD	D	5.00%	2.60%	125	1,880	6.65%	Yes
	SB	2LD	D		2.40%	116	1,880	6.17%	Yes
SW 312 Street to SW 328 Street	NB	1LD	E	2.00%	1.04%	50	1,250	4.00%	No
	SB	1LD	E		0.96%	46	1,190	3.87%	No
SW 162 Avenue									
SW 88 Street to SW 104 Street	NB	2LD	D	1.50%	0.72%	35	1467	2.39%	No
	SB	2LD	D		0.78%	37	1467	2.52%	No
SW 136 Street to SW 144 Street	NB	1LU	D	1.00%	0.48%	23	634	3.63%	No
	SB	1LU	D		0.52%	25	634	3.95%	No
SW 144 Street to SW 152 Street	NB	1LU	D	0.50%	0.26%	12	634	1.89%	No
	SB	1LU	D		0.24%	12	634	1.89%	No
SW 157 Avenue									
SW 72 Street to SW 88 Street	NB	3LD	E+20	2.50%	1.20%	58	2,765	2.10%	No
	SB	2LD	E+20		1.30%	62	1,836	3.38%	No
SW 88 Street to to SW 120 Street	NB	2LD	D	14.00%	6.72%	324	1,467	22.09%	Yes
	SB	2LD	D		7.28%	350	1,540	22.72%	Yes
SW 120 Street to SW 136 Street	NB	2LD	D	25.00%	12.00%	578	1,467	39.40%	Yes
	SB	2LD	D		13.00%	626	1,467	42.67%	Yes
SW 136 Street to SW 184 Street	NB	2LD	D	10.00%	5.20%	251	1,800	13.94%	Yes
	SB	2LD	D		4.80%	231	1,800	12.83%	Yes
SW 152 Avenue									
SW 88 Street to Hammocks Blvd	NB	2LD	D	1.00%	0.48%	23	1,540	1.49%	No
	SB	2LD	D		0.52%	25	1,467	1.70%	No
Hammocks Boulevard									
SW 88 Street to SW 104 Street	NB	2LD	D	4.00%	1.92%	93	1,467	6.34%	Yes
	SB	2LD	D		2.08%	100	1,467	6.82%	Yes
SW 104 Street to SW 147 Avenue	NB	2LD	D	1.00%	0.48%	23	1,467	1.57%	No
	SB	2LD	D		0.52%	25	1,467	1.70%	No
SW 147 Avenue									
SW 72 Street to SW 88 Street	NB	2LD	D	2.00%	0.96%	46	1,890	2.43%	No
	SB	2LD	D		1.04%	50	1,890	2.65%	No
SW 88 Street to SW 104 Street	NB	2LD	D	4.00%	1.92%	93	1,890	4.92%	No
	SB	2LD	D		2.08%	100	1,800	5.56%	Yes
SW 104 Street to SW 120 Street	NB	2LD	D	6.50%	3.12%	150	1,800	8.33%	Yes
	SB	2LD	D		3.38%	163	1,800	9.06%	Yes
SW 152 Street to SW 184 Street	NB	1LU	D	3.00%	1.56%	75	709	10.58%	Yes
	SB	1LU	D		1.44%	70	709	9.88%	Yes
SW 184 Street to SW 200 Street	NB	1LU	C	5.00%	2.60%	125	784	15.94%	Yes
	SB	1LU	C		2.40%	116	598	19.41%	Yes
SW 200 Street to SW 216 Street	NB	1LU	C	4.00%	2.08%	100	598	16.73%	Yes
	SB	1LU	C		1.92%	93	598	15.56%	Yes
SW 216 Street to SW 232 Street	NB	1LU	C	3.50%	1.82%	88	598	14.73%	Yes
	SB	1LU	C		1.68%	81	598	13.55%	Yes
SW 232 Street to SW 248 Street	NB	1LU	C	2.50%	1.30%	62	598	10.37%	Yes
	SB	1LU	C		1.20%	58	598	9.71%	Yes
SW 248 Street to SW 264 Street	NB	1LU	C	2.00%	1.04%	50	598	8.37%	Yes
	SB	1LU	C		0.96%	46	598	7.70%	Yes

TABLE 21.A.2
Traffic Impact Study Area Determination Based Upon 5% Rule

Roadway Segments	Direction	Existing Number of Lanes	Adopted LOS Standard [1]	Project Two-Way Distribution Percent [2]	Directional Split Percentage [3]	Total PM Peak Hour Project Trips [4] 4,817	Maximum Service Volume [5] (MSV)	Project Trips as Percent of MSV	Project Trips ≥ 5% (Yes / No)
NW/SW 137 Avenue									
SR 836 to SW 8 Street	NB	3LD	D	5.00%	2.40%	116	3,171	3.66%	No
	SB	3LD	D		2.60%	125	3,171	3.94%	No
SW 88 Street to SW 104 Street	NB	3LD	D	2.00%	0.96%	46	2,810	1.64%	No
	SB	3LD	D		1.04%	50	2,810	1.78%	No
SW 104 Street to SW 120 Street	NB	3LD	D	1.00%	0.48%	23	2,810	0.82%	No
	SB	3LD	D		0.52%	25	2,810	0.89%	No
SW 120 Street to SW 136 Street	NB	3LD	D	1.00%	0.48%	23	2,814	0.82%	No
	SB	3LD	D		0.52%	25	2,680	0.93%	No
SW 136 Street to SW 152 Street	NB	3LD	D	1.00%	0.48%	23	3,020	0.76%	No
	SB	3LD	D		0.52%	25	3,020	0.83%	No
SW 152 Street to SW 184 Street	NB	3LD	D	2.00%	1.04%	50	3,020	1.66%	No
	SB	3LD	D		0.96%	46	3,020	1.52%	No
SW 184 Street to SW 200 Street	NB	1LU	D	1.00%	0.52%	25	880	2.84%	No
	SB	1LU	D		0.48%	23	880	2.61%	No
SW 127 Avenue									
SW 88 Street to SW 104 Street	NB	2LD	D	1.00%	0.48%	23	1,800	1.28%	No
	SB	2LD	D		0.52%	25	1,890	1.32%	No
SW 104 Street to SW 128 Street	NB	2LD	D	1.00%	0.48%	23	1,800	1.28%	No
	SB	2LD	D		0.52%	25	1,890	1.32%	No
SW 117 Avenue									
SW 88 Street to SW 112 Street	NB	2LD	D	1.00%	0.48%	23	1,890	1.22%	No
	SB	2LD	D		0.52%	25	1,890	1.32%	No
SW 112 Street to SW 136 Street	NB	2LD	D	1.00%	0.48%	23	1,890	1.22%	No
	SB	2LD	D		0.52%	25	1,890	1.32%	No
SW 136 Street to SW 152 Street	NB	2LD	D	1.00%	0.48%	23	1,800	1.28%	No
	SB	2LD	D		0.52%	25	1,800	1.39%	No
SW 152 Street to SW 184 Street	NB	2LD	D	1.00%	0.52%	25	1,890	1.32%	No
	SB	2LD	D		0.48%	23	1,800	1.28%	No
SW 184 Street to SW 200 Street	NB	1LU	D	1.00%	0.52%	25	675	3.70%	No
	SB	1LU	D		0.48%	23	675	3.41%	No
SR 821/HEFT									
SW 88 Street to SW 120 Street	NB	5LD	D	2.00%	0.96%	46	10,680	0.43%	No
	SB	5LD	D		1.04%	50	10,680	0.47%	No
SW 120 Street to SR 874	NB	4LD	D	2.00%	0.96%	46	8,700	0.53%	No
	SB	4LD	D		1.04%	50	8,700	0.57%	No
SR 874 to SW 152 Street	NB	6LD	D	5.00%	2.40%	116	12,520	0.93%	No
	SB	6LD	D		2.60%	125	12,520	1.00%	No
SW 152 Street to SW 184 Street	NB	6LD	D	0.50%	0.26%	12	12,520	0.10%	No
	SB	6LD	D		0.24%	12	12,520	0.10%	No
SW 184 Street to SW 200 Street	NB	5LD	D	0.50%	0.26%	12	10,680	0.11%	No
	SB	5LD	D		0.24%	12	10,680	0.11%	No
SR 874									
HEFT to SW 104 Street	NB	3LD	D	5.00%	2.40%	116	7,080	1.64%	No
	SB	3LD	D		2.60%	125	7,080	1.77%	No
SW 104 Street to SR 878	NB	3LD	D	6.00%	2.88%	139	7,080	1.96%	No
	SB	3LD	D		3.12%	150	7,080	2.12%	No

Notes:

[1] LOS obtained from 2024 FDOT and MDC Concurrency Data.

[2] Distribution obtained from SERPM model runs.

[3] Directional splits are based on the net new trip generation inbound / outbound ratio.

[4] Refer to Section 21B for project trip generation.

[5] The directional peak hour roadway capacities are obtained from the 2023 FDOT Quality / LOS Handbook. For non-state roadways, the roadway capacities are obtained from the 2020 FDOT Quality / LOS Handbook.

Project trips are equal to or exceed 5.0% of the adopted PM peak hour maximum service volume

5. Existing Traffic Conditions

Existing traffic conditions have been documented using the 2024 traffic counts obtained from Miami-Dade County, FDOT and Florida's Turnpike, or from segment counts obtained by the Applicant in the year 2025. Map J-A4 identifies the Miami-Dade County and FDOT count stations located within the study area and segment counts obtained by the Applicant. The traffic counts documentation is included in Appendix 21-2.

Existing traffic conditions on the study area roadways are identified in Table 21.A.3 and includes the facility type, number of travel lanes, count station reference number, source of the traffic count, the adopted level of service standard, PM peak hour volumes, and the PM peak hour maximum service volumes. The segment maximum service volumes used in this study were derived from the FDOT 2023 Q/LOS Handbook or the 2020 Q/LOS Handbook if the context classifications were not available.

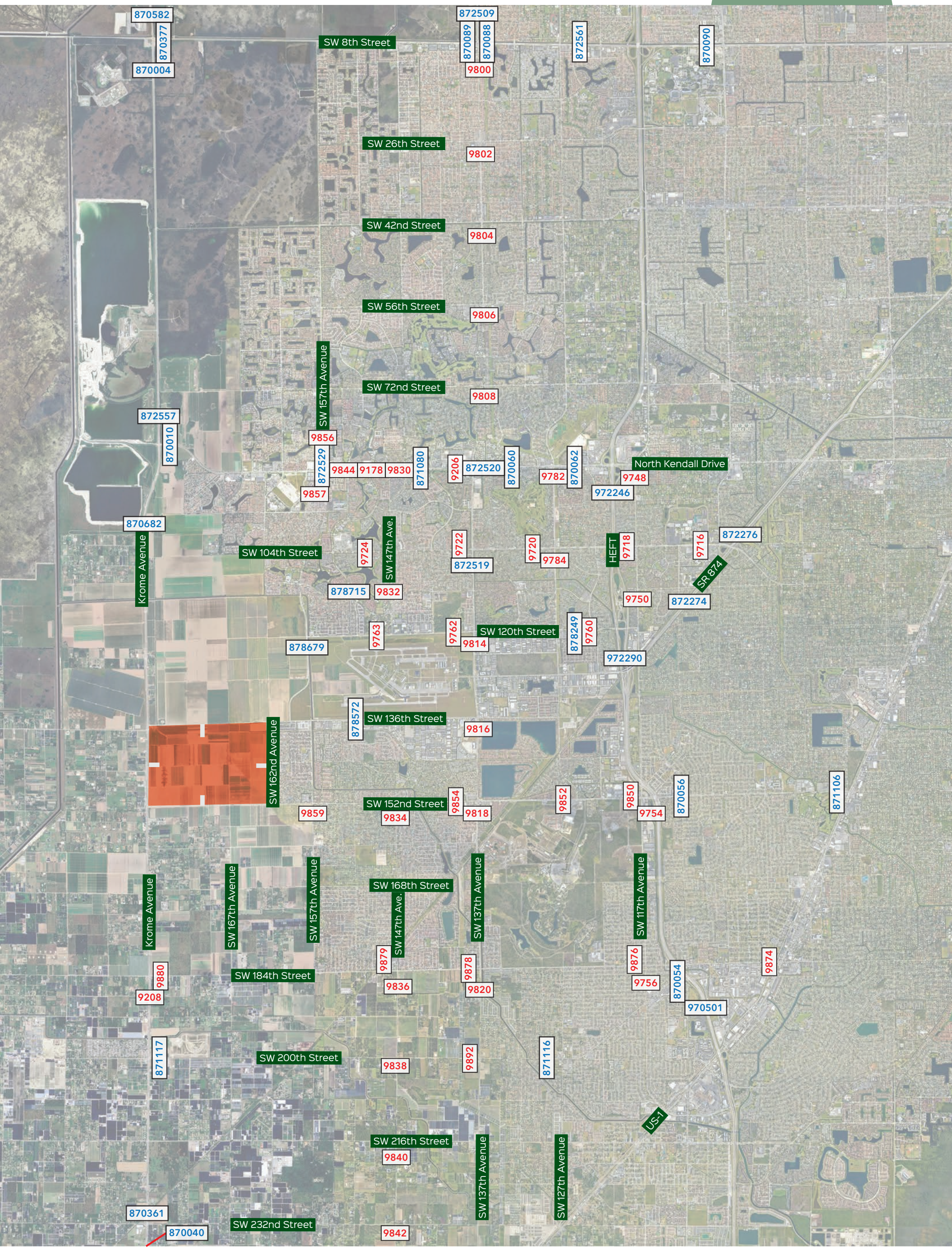
The roadway segments have been analyzed for the weekday PM peak hour (the peak travel hour between 4:00 pm and 6:00 pm). PM peak hour data is provided based upon the MDC and FDOT concurrency data tables and data from the FDOT's Florida Traffic Online website. Additional segment volume data was obtained from a cloud-based traffic analytics application.

Presently two of the analyzed roadway segments operate below the minimum allowable level of service standards at existing conditions. This includes the following roadway segments:

- SW 184th Street from SW 177th Avenue to SW 157th Avenue (Eastbound)
- SW 184th Street from SW 157th Avenue to SW 147th Avenue (Westbound)

Pursuant to Chapter 163.3180, F.S., roadway segments that operate below the adopted level of service standard are deemed to be "transportation deficient." In accordance with Chapter 163.3180, F.S., the improvement necessary to correct the transportation deficiency is the funding responsibility of the entity that has maintenance responsibility for that facility. The project is not responsible to help improve or eliminate existing deficiencies.

Intersection capacity and levels of service analysis will be completed and submitted for review after the segment analysis is found sufficient.



Project Location

00 FDOT Count Station

00 MDC Count Station

Map J-A4

FDOT & MDC Count Station Locations

NORTH
MAP NOT TO SCALE

TABLE 21.A.3
EXISTING PM PEAK HOUR TRAFFIC CONDITIONS

Roadway Segments	Direction	Existing Number of Lanes	Count Station[1]	Adopted LOS Standard[2]	Existing PM Peak Hour Directional Volume[3]	Maximum Service Volume[4]	Met LOS Standard? (Yes / No)	Transportation Deficient? (Yes / No)
SW 8 Street								
SW 187 Avenue to SW 177 Avenue	EB	1LU	870003	C	299	430	Yes	No
	WB	1LU		C	268	430	Yes	No
SW 177 Avenue to SW 157 Avenue	EB	2LD	870377	C	993	1,700	Yes	No
	WB	2LD		C	1,106	1,874	Yes	No
SW 157 Avenue to SW 137 Avenue	EB	3LD	870089	E+20	2,380	3,578	Yes	No
	WB	3LD		E+20	2,652	3,408	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	870088	E+20	1,462	3,767	Yes	No
	WB	3LD		E+20	1,629	3,767	Yes	No
SW 127 Avenue to HEFT	EB	3LD	872561	E	1,871	3,140	Yes	No
	WB	3LD		E	2,084	3,140	Yes	No
HEFT to SW 107 Avenue	EB	3LD	870090	D	1,774	2,810	Yes	No
	WB	3LD		D	1,977	2,810	Yes	No
SW 88 Street								
SW 177 Avenue to SW 167 Avenue	EB	2LD	870010	D	981	1,943	Yes	No
	WB	2LD		D	1,092	1,943	Yes	No
SW 167 Avenue to SW 157 Avenue	EB	3LD	872529	E+20	1,272	3,780	Yes	No
	WB	3LD		E+20	1,417	3,780	Yes	No
SW 157 Avenue to SW 147 Avenue	EB	3LD	871080	E+20	1,865	3,767	Yes	No
	WB	3LD		E+20	2,078	3,780	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	3LD	9206	D	1,693	3,098	Yes	No
	WB	3LD		D	1,887	2,951	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	870060	E+20	2,283	3,588	Yes	No
	WB	3LD		E+20	2,544	3,956	Yes	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	870062	E+20	2,829	4,423	Yes	No
	WB	4LD		E+20	3,152	4,644	Yes	No
SW 104 Street								
SW 157 Avenue to SW 147 Avenue	EB	2LD	9724	E+20	1,013	2,257	Yes	No
	WB	2LD		E+20	1,128	2,257	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	2LD	9722	E+20	1,176	2,257	Yes	No
	WB	2LD		E+20	1,311	2,257	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	9720	E+20	1,504	3,348	Yes	No
	WB	3LD		E+20	1,675	3,348	Yes	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	9718	E+20	1,950	3,348	Yes	No
	WB	3LD		E+20	2,173	3,348	Yes	No
SW 117 Avenue to SR 874	EB	3LD	9716	E+20	1,805	3,348	Yes	No
	WB	3LD		E+20	2,012	3,348	Yes	No
SW 120 Street								
SW 157 Avenue to SW 147 Avenue	EB	2LD	9763	D	643	1,800	Yes	No
	WB	2LD		D	717	1,800	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	2LD	9762	D	1,053	1,890	Yes	No
	WB	2LD		D	1,173	1,800	Yes	No
SW 137 Avenue to SW 122 Avenue	EB	2LD	9760	D	1,065	1,800	Yes	No
	WB	2LD		D	1,187	1,800	Yes	No
SW 122 Avenue to SW 117 Avenue	EB	2LD	878249	D	1,320	1,467	Yes	No
	WB	2LD		D	1,470	1,540	Yes	No
SW 136 Street								
SW 157 Avenue to SW 137 Avenue	EB	2LD	878572	D	741	1,467	Yes	No
	WB	2LD		D	825	1,467	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	2LD	878771	D	438	1,467	Yes	No
	WB	2LD		D	489	1,467	Yes	No
SW 152 Street								
SW 157 Avenue to SW 137 Avenue	EB	2LD	9854	E+20	892	1,881	Yes	No
	WB	2LD		E+20	993	1,975	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	9852	D	1,670	2,854	Yes	No
	WB	3LD		D	1,860	2,718	Yes	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	9850	E+20	1,945	3,348	Yes	No
	WB	3LD		E+20	2,168	3,348	Yes	No
SW 117 Avenue to SW 112 Avenue	EB	2LD	870056	E+20	1,253	2,370	Yes	No
	WB	2LD		E+20	1,396	2,370	Yes	No
SW 112 Avenue to US-1	EB	2LD	871106	E+20	1,076	2,672	Yes	No
	WB	2LD		E+20	1,198	2,545	Yes	No
SW 184 Street								
SW 177 Avenue to SW 157 Avenue	EB	1LU	9880	C	630	598	No	Yes
	WB	1LU		C	702	784	Yes	No
SW 157 Avenue to SW 147 Avenue	EB	1LU	9879	D	689	792	Yes	No
	WB	1LU		D	767	634	No	Yes
SW 147 Avenue to SW 137 Avenue	EB	2LD	9878	D	912	1,800	Yes	No
	WB	2LD		D	1,017	1,800	Yes	No
SW 137 Avenue to SW 117 Avenue	EB	2LD	9876	D	1,172	1,800	Yes	No
	WB	2LD		D	1,305	1,800	Yes	No
SW 117 Avenue to US-1	EB	2LD	9874	D	744	1,890	Yes	No
	WB	2LD		D	828	1,800	Yes	No

TABLE 21.A.3
EXISTING PM PEAK HOUR TRAFFIC CONDITIONS

Roadway Segments	Direction	Existing Number of Lanes	Count Station[1]	Adopted LOS Standard[2]	Existing PM Peak Hour Directional Volume[3]	Maximum Service Volume[4]	Met LOS Standard? (Yes / No)	Transportation Deficient? (Yes / No)
SW 200 Street/Quail Roost								
SW 177 Avenue to SW 147 Avenue	EB	1LU	871117	D	343	730	Yes	No
	WB	1LU		D	382	730	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	1LU	9892	C	369	430	Yes	No
	WB	1LU		C	411	430	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	1LU	871116	E	715	1,250	Yes	No
	WB	1LU		E	797	1,313	Yes	No
SW 127 Avenue to SR 821/HEFT	EB	2LD	870054	E	862	2,100	Yes	No
	WB	2LD		E	961	2,100	Yes	No
SW 177 Avenue								
US 27 to SW 2 Street	NB	2LD	870052	C	984	2,390	Yes	No
	SB	2LD		C	1,198	2,510	Yes	No
SW 2 Street to SW 8 Street	NB	2LD	870582	C	1,240	2,390	Yes	No
	SB	2LD		C	1,381	2,510	Yes	No
SW 8 Street to SW 12 Street	NB	2LD	870004	C	1,398	2,510	Yes	No
	SB	2LD		C	1,557	2,390	Yes	No
SW 12 Street to SW 88 Street	NB	2LD	872557	C	1,261	2,510	Yes	No
	SB	2LD		C	1,406	2,510	Yes	No
SW 88 Street to SW 136 Street	NB	2LD	870682	C	1,339	2,510	Yes	No
	SB	2LD		C	1,492	2,510	Yes	No
SW 136 Street to SW 200 Street	NB	2LD	9208	C	1,549	2,510	Yes	No
	SB	2LD		C	1,725	2,510	Yes	No
SW 200 Street to SW 232 Street	NB	2LD	870361	C	1,118	2,510	Yes	No
	SB	2LD		C	1,245	2,510	Yes	No
SW 232 Street to SW 288 Street	NB	2LD	870040	C	1,078	2,510	Yes	No
	SB	2LD		C	1,201	2,510	Yes	No
SW 288 Street to SW 312 Street	NB	2LD	870043	D	839	1,880	Yes	No
	SB	2LD		D	934	1,880	Yes	No
SW 312 Street to SW 328 Street	NB	1LD	875017	E	674	1,250	Yes	No
	SB	1LD		E	752	1,190	Yes	No
SW 162 Avenue								
SW 88 Street to SW 104 Street	NB	2LD	iNode	D	534	1467	Yes	No
	SB	2LD		D	589	1467	Yes	No
SW 136 Street to SW 144 Street	NB	1LU	iNode	D	43	634	Yes	No
	SB	1LU		D	25	634	Yes	No
SW 144 Street to SW 152 Street	NB	1LU	iNode	D	54	634	Yes	No
	SB	1LU		D	54	634	Yes	No
SW 157 Avenue								
SW 72 Street to SW 88 Street	NB	3LD	9856	E+20	750	2,765	Yes	No
	SB	2LD		E+20	835	1,836	Yes	No
SW 88 Street to to SW 120 Street	NB	2LD	9857	D	693	1,467	Yes	No
	SB	2LD		D	772	1,540	Yes	No
SW 120 Street to SW 136 Street	NB	2LD	878679	D	864	1,467	Yes	No
	SB	2LD		D	963	1,467	Yes	No
SW 136 Street to SW 184 Street	NB	2LD	9859	D	881	1,800	Yes	No
	SB	2LD		D	981	1,800	Yes	No
SW 152 Avenue								
SW 88 Street to Hammocks Blvd	NB	2LD	9844	D	364	1,540	Yes	No
	SB	2LD		D	442	1,467	Yes	No
Hammocks Boulevard								
SW 88 Street to SW 104 Street	NB	2LD	9178	D	233	1,467	Yes	No
	SB	2LD		D	260	1,467	Yes	No
SW 104 Street to SW 147 Avenue	NB	2LD	878715	D	566	1,467	Yes	No
	SB	2LD		D	631	1,467	Yes	No
SW 147 Avenue								
SW 72 Street to SW 88 Street	NB	2LD	9828	D	917	1,890	Yes	No
	SB	2LD		D	823	1,890	Yes	No
SW 88 Street to SW 104 Street	NB	2LD	9830	D	875	1,890	Yes	No
	SB	2LD		D	786	1,800	Yes	No
SW 104 Street to SW 120 Street	NB	2LD	9832	D	746	1,800	Yes	No
	SB	2LD		D	669	1,800	Yes	No
SW 152 Street to SW 184 Street	NB	1LU	9834	D	445	709	Yes	No
	SB	1LU		D	399	709	Yes	No
SW 184 Street to SW 200 Street	NB	1LU	9836	C	640	784	Yes	No
	SB	1LU		C	574	598	Yes	No
SW 200 Street to SW 216 Street	NB	1LU	9838	C	445	598	Yes	No
	SB	1LU		C	400	598	Yes	No
SW 216 Street to SW 232 Street	NB	1LU	9840	C	361	598	Yes	No
	SB	1LU		C	324	598	Yes	No
SW 232 Street to SW 248 Street	NB	1LU	9842	C	321	598	Yes	No
	SB	1LU		C	289	598	Yes	No
SW 248 Street to SW 264 Street	NB	1LU	878223	C	436	598	Yes	No
	SB	1LU		C	486	598	Yes	No

TABLE 21.A.3
EXISTING PM PEAK HOUR TRAFFIC CONDITIONS

Roadway Segments	Direction	Existing Number of Lanes	Count Station[1]	Adopted LOS Standard[2]	Existing PM Peak Hour Directional Volume[3]	Maximum Service Volume[4]	Met LOS Standard? (Yes / No)	Transportation Deficient? (Yes / No)
NW/SW 137 Avenue								
SR 836 to SW 8 Street	NB	3LD	872509	E+20	2,006	3,171	Yes	No
	SB	3LD		E+20	2,235	3,171	Yes	No
SW 88 Street to SW 104 Street	NB	3LD	872520	D	1,202	2,810	Yes	No
	SB	3LD		D	1,339	2,810	Yes	No
SW 104 Street to SW 120 Street	NB	3LD	872519	D	1,355	2,810	Yes	No
	SB	3LD		D	1,217	2,810	Yes	No
SW 120 Street to SW 136 Street	NB	3LD	9814	D	2,022	2,814	Yes	No
	SB	3LD		D	1,814	2,680	Yes	No
SW 136 Street to SW 152 Street	NB	3LD	9816	D	1,588	3,020	Yes	No
	SB	3LD		D	1,425	3,020	Yes	No
SW 152 Street to SW 184 Street	NB	3LD	9818	D	1,668	3,020	Yes	No
	SB	3LD		D	1,498	3,020	Yes	No
SW 184 Street to SW 200 Street	NB	1LU	9820	D	708	880	Yes	No
	SB	1LU		D	636	880	Yes	No
SW 127 Avenue								
SW 88 Street to SW 104 Street	NB	2LD	9782	D	696	1,800	Yes	No
	SB	2LD		D	775	1,890	Yes	No
SW 104 Street to SW 128 Street	NB	2LD	9784	D	521	1,800	Yes	No
	SB	2LD		D	580	1,890	Yes	No
SW 117 Avenue								
SW 88 Street to SW 112 Street	NB	2LD	9748	D	1,002	1,890	Yes	No
	SB	2LD		D	900	1,890	Yes	No
SW 112 Street to SW 136 Street	NB	2LD	9750	D	1,101	1,890	Yes	No
	SB	2LD		D	989	1,890	Yes	No
SW 136 Street to SW 152 Street	NB	2LD	9752	D	966	1,800	Yes	No
	SB	2LD		D	867	1,800	Yes	No
SW 152 Street to SW 184 Street	NB	2LD	9754	D	924	1,890	Yes	No
	SB	2LD		D	830	1,800	Yes	No
SW 184 Street to SW 200 Street	NB	1LU	9756	D	537	675	Yes	No
	SB	1LU		D	482	675	Yes	No
SR 821/HEFT								
SW 88 Street to SW 120 Street	NB	5LD	972246	D	7,053	10,680	Yes	No
	SB	5LD		D	5,475	10,680	Yes	No
SW 120 Street to SR 874	NB	4LD	972290	D	6,658	8,700	Yes	No
	SB	4LD		D	5,168	8,700	Yes	No
SR 874 to SW 152 Street	NB	6LD	972266	D	12,186	12,520	Yes	No
	SB	6LD		D	9,459	12,520	Yes	No
SW 152 Street to SW 184 Street	NB	6LD	972254	D	9,467	12,520	Yes	No
	SB	6LD		D	7,349	12,520	Yes	No
SW 184 Street to SW 200 Street	NB	5LD	970501	D	7,486	10,680	Yes	No
	SB	5LD		D	6,994	10,680	Yes	No
SR 874								
HEFT to SW 104 Street	NB	3LD	872274	D	2,596	7,080	Yes	No
	SB	3LD		D	4,363	7,080	Yes	No
SW 104 Street to SR 878	NB	3LD	872276	D	2,681	7,080	Yes	No
	SB	3LD		D	4,507	7,080	Yes	No

Notes:

[1]Station numbers obtained from 2024 FDOT and MDC Concurrency Data and FDOT Florida Traffic Online website.

[2]Obtained from 2024 FDOT and MDC Concurrency Data.

[3]Two-way volume obtained from 2024 FDOT and MDC Concurrency Data and D Factor obtained from FDOT Florida Traffic Online website.

[4]The directional peak hour roadway capacities are obtained from the 2023 FDOT Quality/LOS Handbook. For non-state roadways, the roadway capacities are obtained from the 2020 FDOT Quality/LOS Handbook.

PM peak hour volume exceeds the adopted PM peak hour maximum service volume

6. Planned and Programmed Transportation Improvements

The programmed (funded) transportation improvements located within the traffic impact study area have been identified from the Miami-Dade County TPO Transportation Improvement Program (TIP) 2026, adopted May 29, 2025, reflecting projects funded from FY 2026 to FY 2030. Pursuant to Rule 73C-40.045, those improvements to the SIS system which are funded for construction within the five year work program have been incorporated into this study. For all other roadway segments, those improvements funded for construction by the third year of the five-year work program (year 2028) have been incorporated into this study. Table 21.A.4 identifies the programmed improvements beneficial to the study area.

Committed improvements have been identified using information available from the Miami-Dade County Year 2050 Cost Feasible Long-Range Transportation Plan, and the Programmed and Planned Transit Corridor Map from Miami-Dade County. Table 21.A.5 identifies the Priority I, II, III and VI improvements from the 2050 LRTP. Funding details from the TIP and the 2050 LRTP are included in Appendix 21-4.

TABLE 21.A.4
Programmed Roadway Improvement Highlights from TIP 2026

MPO Project #	Roadway	From	To	Project Type	Funded (Yes/No)
PS0000017	SW 137 Avenue	SW 72 Street	SW 88 Street	Widen from 4 to 6 lanes	No
PW0001076	SW 127 Avenue	SW 136 Street	SW 128 Street	Widen bike lane from 2 to 4 lanes	Yes
PW0000148	SW 152 Avenue	SW 312 Street	US 1	Widen from 2 to 3 lanes	Yes
PW0001149	SW 127 Avenue	SW 144 Street	SW 136 Street	Add 2 lanes/new 4 lanes	Yes
PWMIFEBP0015	SW 147 Avenue	SW 182 Street	SW 154 Street	Bicycle protection improvement	No
PWMIFEBP0016	SW 142 Avenue	SW 168 Street	SW 160 Street	Bicycle capacity improvement	No
PWMIFEBP0017	SW 137 Avenue & SW 138 Avenue			Traffic signal	No
PWMIFEBP0018	SW 137 Avenue & SW 59 Street			Intersection improvement	No
PWMIFEBP0019	SW 160 Street	SW 157 Avenue	SW 147 Court	Bicycle capacity improvement	No
PWMIFEBP0023	SW 160 Street	SW 147 Court	SW 137 Avenue	Bicycle capacity improvement	No
PWMIFERDWY0007	SW 88 Street at SW 150 Avenue			Intersection improvement	No
TP4060961	HEFT/SR 821	North of Eureka Drive	South of Killian Parkway	Add lanes & reconstruct	No
TP4150511	HEFT/SR 821	South of Killian Parkway	North of SW 72 Street	Add lanes & reconstruct	No
TP4150514	HEFT/SR 821	Bird Road	SW 836	Add lanes & reconstruct	No
TP4154881	HEFT/SR 821	SW 216 Street	North of Eureka Drive	Add lanes & reconstruct	No
TP4271461	HEFT/SR 821	North of SW 72 Street	Bird Road	Add lanes & reconstruct	No
XA83618	Kendall Parkway - SR 836	SW 136 Street	Terminus at NW 137 Avenue/NW 12 Street	Expressway Extension	No
XA83618-007	SR 836	HEFT	97 Avenue	Roadway widening	Yes

TABLE 21.A.5
Planned Roadway Improvements 2050 Long Range Transportation Plan

ID - Agency	Roadway	From	To	Project Type	Priority
12 - DTPW	SW 127 Avenue	SW 244 Street	SW 184 Street	Capacity improvement	IV
28 - DTPW	SW 117 Avenue	US 1	SW 184 Street	Road reconstruction/Traffic operations improvement	I
29 - DTPW	SW 127 Avenue	SW 144 Street	SW 136 Street	Add 2 lanes and reconstruct	I
30 - DTPW	SW 127 Avenue	SW 136 Street	SW 128 Street	Roadway improvements	I
69 - DTPW	SW 104 Street (Killian Pkwy)	SW 147 Avenue	SW 137 Avenue	Add 2 lanes and reconstruct; widen 4 to 6 lanes	III
75 - DTPW	SW 147 Avenue	SW 184 Street (Eureka Drive)	SW 152 Street (Coral Reef Drive)	Add 2 lanes and reconstruct	III
100 - DTPW	SW 104 Street	SW 147 Avenue	SW 137 Avenue	Widen from 4 to 6 lanes	Unfunded
106 - DTPW	SW 120 Street	Kendall Parkway	SW 157 Avenue	New 4 lane roadway	Unfunded
107 - DTPW	SW 124 Avenue over Canal C-102-N	S of SW 232 Street		Bridge Repair/Replacements	Unfunded
111 - DTPW	SW 157 Avenue over Canal C-103-N	North of 264 Street		Bridge Repair/Replacements	Unfunded
114 - DTPW	SW 168 Street over Canal L-31 N	E of SW 197 Avenue		Bridge Repair/Replacements	Unfunded
2 - FDOT	Miami-Dade County - SW 127 Avenue	SW 136 Street	SW 128 Street	Widen/Resurface Existing Lanes	I
7 - GMX	Kendall Parkway/SR 836 (Dolphin) SW Extension	SR 836 (Dolphin) terminus at NW 137 Ave/NW 12 Street	SW 136 Street	Planning and right-of-way acquisition for new multimodal corridor from the terminus of SR 836 to SW 56 Street. Final design and construction of SR 836 mainline from 97 Avenue to 107 Avenue and widening of 137 Avenue from SW 8 Street to SW 26 Street per work program.	I

B. Provide a projection of vehicle trips expected to be generated by this development. State all standards and assumptions used, including trip end generation rates by land use types, sources of data, modal split, persons per vehicle, etc., as appropriate. The acceptable methodology to be used for projecting trip generation (including the Florida Standard Urban Transportation Model Structure or the Institute of Transportation Engineers trip generation rates) shall be determined at the Pre-application Conference stage.

1. Trip Generation

City Park is located on approximately 954 acres of land accommodating a mixed-use community and neighborhood development program combining residential, employment, retail services, schools, parks and community uses to create a balanced and sustainable neighborhood plan. The project includes office, commercial, and industrial spaces, providing an employment base with high-paying quality jobs, supported by a mixture of single family and multi-family residential supply. The project is providing public infrastructure inclusive of an elementary school, middle school, high school, community park space, and community uses. The project clusters development around a planned **transit hub** and concentrates density within walkable neighborhoods, schools, transit facilities, and civic spaces.

The trip rates and formulas from ITE Trip Generation Manual, 11th Edition have been used to depict the detailed PM peak hour trip generation analysis for the DRI. Table 21.B1 provides a trip generation summary identifying the land use codes (LUC), gross trips, the internal trip reductions, appropriate directional distribution, and the net external trips for the PM peak hour.

2. Multimodal / Non-Auto Traffic Deductions

City Park is designed around a **multimodal transportation framework**, including a **transit-oriented development (TOD) node** aligned with the CSX Portland Spur and SMART Plan. A **mobility hub**, walkable street grid, bikeways, and pedestrian paths reduce automobile dependency, increase transit readiness, and contribute to state goals for VMT reduction, air quality, and connectivity. These transportation strategies improve access to jobs, schools, and services while supporting compact growth.

According to the traffic methodology outlined in the "Agreement to Delete" document, multimodal and non-automobile traffic deductions should be initially based on information derived from the U.S. Census data. Based on U.S. Census data for zip code 33196, 2.2% of the area utilizes non-vehicle transportation modes (1.6% public transit and 0.6% walking). However, as the project site is currently in an undeveloped area of Miami-Dade County, this Census data likely underestimates future usage of alternative modes. The project includes a transit hub accommodating at least two Miami-Dade County transit buses with 20-minute headways, alongside an extensive network of pedestrian pathways and bikeways to encourage walking and cycling. This network includes the following pedestrian infrastructure:

- Bike lanes - approximately 23 miles
- Bike routes - approximately 8,000 feet
- Class 1 trails (off-street trails intended for pedestrian and cyclist use) - approximately 9 miles
- Sidewalks - approximately 24 miles

Based on similar developments, these features are expected to increase non-vehicle mode usage significantly. Therefore, the project applied a conservative 5% deduction to vehicle trip estimates to account for these alternative transportation modes.

According to the American Community Survey (ACS), remote work surged across major industries from 2019 to 2021, then slightly declined in 2022 after social distancing policies ended, yet remained above 2019 levels. The Census data for the area surrounding the project area show that 9.8% of employees worked from home in 2023. This shift in work patterns has reduced commuting trips, lowering traffic volumes. To reflect this, the project applied a 9.8% deduction to residential vehicle trips, based on local telecommuting trends and comparable urban projects.

3. Land Use Equivalency Matrix

As part of the City Park DRI application, the Applicant will request approval of a **Land Use Equivalency Matrix (LUEM)**. The LUEM is intended to provide flexibility in implementing the Development Order by allowing adjustments among approved land use types—such as residential, retail, office and industrial—while maintaining equivalent impacts on public facilities and infrastructure as originally evaluated. This tool will ensure that the project can respond to future market conditions and development demands without requiring a formal amendment, provided that any land use conversions remain within the parameters established by the DRI approval and do not increase impacts on transportation and utilities. This approach is consistent with **Section 380.06, Florida Statutes**, and established DRI best practices, which encourage the use of land use equivalency matrices to streamline implementation, maintain compliance with impact thresholds, and allow projects to adapt over multi-year buildout periods without unnecessary procedural delays. The LUEM will be provided once the traffic analysis is found sufficient.

Table 21.B1 – Trip Generation Summary for the DRI

Proposed ITE Land Use Designation[1]	Number of Units	PM Peak Hour Vehicle Trips		
		In	Out	Total
Single Family Housing *Land Use Code: 210*	1,029 DU	560	329	889
		Ln(T) = 0.94Ln(X) + 0.27 (1)		
Low-Rise Multifamily Housing *Land Use Code: 220*	4,532 DU	1,241	729	1,970
		T = 0.43(X) + 20.55 (1)		
Mid-Rise Multifamily Housing *Land Use Code: 221*	2,239 DU	533	341	874
		T = 0.39(X) + 0.34 (1)		
Shopping Center (>150K) *Land Use Code: 820*	749,153 SF	1,155	1,251	2,406
		Ln(T) = 0.72Ln(X) + 3.02 (1)		
General Office *Land Use Code: 710*	500,000 SF	107	524	631
		Ln(T) = 0.83Ln(X) + 1.29 (1)		
Industrial Warehousing *Land Use Code: 150*	892,484 SF	37	96	133
		T = 0.12(X) + 26.48 (1)		
Public Park *Land Use Code: 411*	56 Acres	14	12	26
		T = 0.06(X) + 20.60 (1)		
Elementary School (K-5) *Land Use Code: 520*	1,011 Students	74	87	161
		Rate = 0.16 / Student (1)		
Middle School / Junior High *Land Use Code: 522*	1,222 Students	88	95	183
		Rate = 0.15 / Student (1)		
High School *Land Use Code: 525*	1,630 Students	110	119	229
		Rate = 0.14 / Student (1)		
Total Gross Vehicle Trips		**3,919**	**3,583**	**7,502**
Other Modes of Transportation (Transit/ Ped)[2]	5.0%	-197	-180	-377
Work from Home (Residential only)[2]	9.8%	-229	-137	-366
Internal Capture (ITE)[3]	20.6%	-702	-691	-1,393
Internal Capture (Schools -Residential)[4]	3.2%	-102	-113	-215
Retail Pass-by[5]	19%	-167	-167	-334
Net New External Vehicle Trips		**2,522**	**2,295**	**4,817**

[1] Based on ITE *Trip Generation Manual*, 11th Edition.

[2] Based on US Census other modes of transportation data for Zip code 33196 & local characteristics at built-out conditions.

[3] Based on internal capture rates from ITE, *Trip Generation Handbook,* 3rd Edition; Chapter 6 - Trip Generation for Mixed-Use Development.

[4] Internal Capture between schools & residential uses was previously approved and assumed to be 39.5% based on US Census data.

[5] ITE *Trip Generation Manual*, 11th Edition; Appendix E - Database on Pass-By, Diverted, and Primary Trips. ITE rate assumed. If necessary, pass-by will be reduced to ensure pass-by does not exceed 10% of adjacent street traffic.

C. Estimate the internal/external split for the generated trips at the end of each phase of development as identified in (B) above. Use the format below and include a discussion of what aspects the development (i.e., provision of on-site shopping and recreation facilities, on-site employment opportunities, etc.) will account for this internal/external split. Provide supporting documentation showing how splits were estimated, such as the results of the Florida Standard Urban Transportation Model Structure (FSUTMS) model application. Describe the extent to which the proposed design and land use mix will foster a more cohesive, internally supported project.

1. Internal Trip Reduction

The mixture of neighborhood supportive land uses within the DRI will result in the satisfaction of internal trips without the use of external or regional roadways located outside of the DRI project boundaries. The retail, office, industrial, and community uses, as well as parks and schools will be utilized (in large part) by the residents living in the proposed communities. Since the ITE trip generation rates are derived from freestanding land uses, a manual adjustment is necessary to account for the internal trip making characteristics of this mixed-use DRI.

The internalization for the DRI has been developed using the internalization rates within the ITE Trip Generation Handbook, 3rd Edition. An internalization matrix was developed to determine the internal orientation of the project trips. Internalization documentation is provided in Appendix 21-3. Approximately 20% of the PM peak hour trips generated by the project are anticipated to be satisfied onsite.

2. School Trips

As part of the trip generation analysis, internal school trip reductions are based upon the anticipated 1,011 elementary students, 1,222 middle school students, and 1,630 high school students attending schools within the project limits. Due to the remoteness of the City Park DRI and the goal of creating a self-sustaining community by providing schools (elementary, middle, and high), a 39.5% capture rate for school trips will be used. This percentage was calculated based on information from the Census data. Detailed calculations are provided in Appendix 21-3.

3. Pass-by Capture and Diverted Link Trips

Research shows that a portion of the retail trips to and from the site are “pass-by trips”. ITE defines “pass-by trips” as trips attracted to the site from the adjacent street. ITE has established that for “Shopping Centers” over 150,000 square feet, approximately 19% of the trips are pass-by.

D. Provide a projection of total peak hour directional traffic, with the DRI, on the highway network within the study area at the end of each phase of development. If these projections are based on a validated FSUTMS, state the source, date and network of the model and of the TAZ projections. If no standard model is available and some other model or procedure is used, describe it in detail and include documentation showing its validity. Describe the procedure used to estimate and distribute traffic with full DRI development in sub zones at build out and at interim phase-end years. These assignments may reflect the effects of any new road or improvements which are programmed in adopted capital improvement programs and/or comprehensive plans to be constructed during DRI construction; however, the inclusion of such roads should be clearly identified. Show these link projections on maps or tables of the study area network, one map or table for each phase-end year. Describe how these conclusions were reached.

1. Background Traffic Growth Rate

As agreed upon with the reviewing agencies, a growth factor consistent with historical annual growth in the area was applied to the existing traffic volumes to determine background traffic volumes for the 2036 buildout year. The growth factor was determined using the Annual Average Daily Traffic (AADT) counts published by the FDOT and the procedures outlined in the FDOT Multimodal Transportation Site Impact Handbook (2023). This method calculates growth rates by station and considers three methodologies (linear, exponential, and decaying exponential growth).

Linear growth predicts the future traffic based on a straight line developed from historic traffic growth. This model assumes a constant amount of growth each year and does not consider a capacity restraint. Exponential growth predicts the future traffic based on a percentage of growth from the previous year. This model is most applicable where there is rapid growth and capacity available. Decaying exponential growth is used to project future traffic in areas with a declining rate of growth over the analysis period. This model form is recommended for site impact analysis in more built out areas. Because the project is located in an undeveloped area of Miami-Dade County, the decaying exponential growth method was excluded from the calculation.

Calculations were completed using 10 years of historic traffic count data from stations located within three miles from each side of the project's boundary. As requested by the reviewing agencies 2020 and 2021 data were excluded from the calculations. The results of the calculation show a growth rate of 1.22% using the exponential growth and 1.76% when using the linear growth.

A comparison of traffic volumes from the 2015 and 2045 Southeast Florida Regional Planning Model (SERPM) was also conducted. A growth rate for each roadway segment within three miles from the project was calculated using a linear growth rate between the 2015 and 2045 volumes. The comparison of SERPM volumes yielded an average annual growth rate of 1.21% per year.

As agreed upon with the reviewing agencies, a 0.7% growth rate was used for roadway segments within two miles of the project's boundary and a 1.4% growth rate was used for roadway segments beyond two miles from the project boundary. A summary of the calculated growth rates for the linear and exponential growth rates, supporting documentation, and SERPM model supporting documentation are provided in Appendix D1.

At the request of the FDOT, the following growth rates were applied to the segments along Krome Avenue:

- Krome Avenue south of SW 136th Street = 1.35%
- Krome Avenue from SW 136th Street to Kendall Drive = 1.35%
- Krome Avenue north of Kendall Drive = 1.94%

Additionally, at the request of the Florida's Turnpike Enterprise a growth rate of 2.0% was used for the segment of the Florida's Turnpike within the project limits.

For DRI purposes, committed developments are considered to be all approved developments anticipated to generate more than 400 peak hour trips. After a review of the project area, no committed developments met this criterion.

2. Future Background Traffic

Table 21.D.1 provides the analysis of Year 2036 future background traffic without the project traffic conditions (before the addition of the DRI project traffic) and includes growing existing traffic to the year 2036 using the agreed upon historical growth rates. The evaluation of future without project conditions in Table 21.D.1 includes the following:

- The future lane geometry for study area roadways inclusive of the improvements under construction and the improvements funded in the 2026 – 2030 TIP, if any.
- The adopted level of service standard for each roadway segment analyzed.
- The existing directional PM peak hour traffic from Table 21.A.3;
- The applied historical growth rates (see the historical growth rate calculations in Appendix 21.D);
- The future without the project traffic for the year 2036;
- The directional peak hour roadway capacity based upon the FDOT 2023 Q/LOS Handbook or the 2020 Q/LOS Handbook.
- Determination if the 2036 future without the project traffic volumes are within the directional roadway capacity.

At future without project conditions, the following analyzed roadway segments operate below the minimum allowable level of service standards:

- SW 120th Street from SW 122nd Avenue to SW 117th Avenue
- SW 184th Street from SW 177th Avenue to SW 157th Avenue (Eastbound)
- SW 184th Street from SW 157th Avenue to SW 147th Avenue (Westbound)
- SW 200th Street from SW 147th Avenue to SW 137th Avenue
- SW 147th Avenue from SW 184th Street to SW 200th Street (Southbound)
- SR 821/HEFT from SR 874 to SW 152nd Street (Northbound)

Pursuant to Chapter 163.3180, F.S., roadway segments that operate below the adopted level of service standard are deemed to be “transportation deficient.” In accordance with Chapter 163.3180, F.S., the improvement necessary to correct the transportation deficiency is the funding responsibility of the entity that has maintenance responsibility for that facility. The project is not responsible to help improve or eliminate deficiencies shown at future without project conditions.

Intersection capacity and levels of service analysis will be completed and submitted for review after the segment analysis is found sufficient.

TABLE 21.D.1
FUTURE WITHOUT PROJECT PM PEAK HOUR TRAFFIC CONDITIONS

Roadway Segments	Direction	Number of Lanes in 2036	Adopted LOS Standard [1]	Existing PM peak Hour Directional Volume [2]	Growth Rate [3]	Future without Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume [4]	Met LOS Standard? (Yes / No)	Transportation Deficient? (Yes / No)
SW 8 Street									
SW 187 Avenue to SW 177 Avenue	EB	1LU	C	299	1.40%	353	430	Yes	No
	WB	1LU	C	268	1.40%	317	430	Yes	No
SW 177 Avenue to SW 157 Avenue	EB	2LD	C	993	1.40%	1,173	1,700	Yes	No
	WB	2LD	C	1,106	1.40%	1,307	1,874	Yes	No
SW 157 Avenue to SW 137 Avenue	EB	3LD	E+20	2,380	1.40%	2,812	3,578	Yes	No
	WB	3LD	E+20	2,652	1.40%	3,133	3,408	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	1,462	1.40%	1,727	3,767	Yes	No
	WB	3LD	E+20	1,629	1.40%	1,925	3,767	Yes	No
SW 127 Avenue to HEFT	EB	3LD	E	1,871	1.40%	2,210	3,140	Yes	No
	WB	3LD	E	2,084	1.40%	2,463	3,140	Yes	No
HEFT to SW 107 Avenue	EB	3LD	D	1,774	1.40%	2,096	2,810	Yes	No
	WB	3LD	D	1,977	1.40%	2,336	2,810	Yes	No
SW 88 Street									
SW 177 Avenue to SW 167 Avenue	EB	2LD	D	981	1.40%	1,159	1,943	Yes	No
	WB	2LD	D	1,092	1.40%	1,291	1,943	Yes	No
SW 167 Avenue to SW 157 Avenue	EB	3LD	E+20	1,272	1.40%	1,503	3,780	Yes	No
	WB	3LD	E+20	1,417	1.40%	1,674	3,780	Yes	No
SW 157 Avenue to SW 147 Avenue	EB	3LD	E+20	1,865	1.40%	2,204	3,767	Yes	No
	WB	3LD	E+20	2,078	1.40%	2,455	3,780	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	3LD	D	1,693	1.40%	2,001	3,098	Yes	No
	WB	3LD	D	1,887	1.40%	2,229	2,951	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	2,283	1.40%	2,698	3,588	Yes	No
	WB	3LD	E+20	2,544	1.40%	3,006	3,956	Yes	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	2,829	1.40%	3,343	4,423	Yes	No
	WB	4LD	E+20	3,152	1.40%	3,724	4,644	Yes	No
SW 104 Street									
SW 157 Avenue to SW 147 Avenue	EB	2LD	E+20	1,013	0.70%	1,101	2,257	Yes	No
	WB	2LD	E+20	1,128	0.70%	1,227	2,257	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	2LD	E+20	1,176	1.40%	1,390	2,257	Yes	No
	WB	2LD	E+20	1,311	1.40%	1,549	2,257	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	1,504	1.40%	1,777	3,348	Yes	No
	WB	3LD	E+20	1,675	1.40%	1,980	3,348	Yes	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	1,950	1.40%	2,304	3,348	Yes	No
	WB	3LD	E+20	2,173	1.40%	2,567	3,348	Yes	No
SW 117 Avenue to SR 874	EB	3LD	E+20	1,805	1.40%	2,133	3,348	Yes	No
	WB	3LD	E+20	2,012	1.40%	2,377	3,348	Yes	No
SW 120 Street									
SW 157 Avenue to SW 147 Avenue	EB	2LD	D	643	0.70%	699	1,800	Yes	No
	WB	2LD	D	717	0.70%	779	1,800	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	2LD	D	1,053	1.40%	1,244	1,890	Yes	No
	WB	2LD	D	1,173	1.40%	1,386	1,800	Yes	No
SW 137 Avenue to SW 122 Avenue	EB	2LD	D	1,065	1.40%	1,259	1,800	Yes	No
	WB	2LD	D	1,187	1.40%	1,402	1,800	Yes	No
SW 122 Avenue to SW 117 Avenue	EB	2LD	D	1,320	1.40%	1,559	1,467	No	Yes
	WB	2LD	D	1,470	1.40%	1,737	1,540	No	Yes
SW 136 Street									
SW 157 Avenue to SW 137 Avenue	EB	2LD	D	741	0.70%	805	1,467	Yes	No
	WB	2LD	D	825	0.70%	897	1,467	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	2LD	D	438	1.40%	518	1,467	Yes	No
	WB	2LD	D	489	1.40%	577	1,467	Yes	No
SW 152 Street									
SW 157 Avenue to SW 137 Avenue	EB	2LD	E+20	892	1.40%	1,053	1,881	Yes	No
	WB	2LD	E+20	993	1.40%	1,174	1,975	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	D	1,670	1.40%	1,973	2,854	Yes	No
	WB	3LD	D	1,860	1.40%	2,198	2,718	Yes	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	1,945	1.40%	2,299	3,348	Yes	No
	WB	3LD	E+20	2,168	1.40%	2,561	3,348	Yes	No
SW 117 Avenue to SW 112 Avenue	EB	2LD	E+20	1,253	1.40%	1,480	2,370	Yes	No
	WB	2LD	E+20	1,396	1.40%	1,649	2,370	Yes	No
SW 112 Avenue to US-1	EB	2LD	E+20	1,076	1.40%	1,271	2,672	Yes	No
	WB	2LD	E+20	1,198	1.40%	1,416	2,545	Yes	No
SW 184 Street									
SW 177 Avenue to SW 157 Avenue	EB	1LU	C	630	0.70%	685	598	No	Yes
	WB	1LU	C	702	0.70%	763	784	Yes	No
SW 157 Avenue to SW 147 Avenue	EB	1LU	D	689	0.70%	749	792	Yes	No
	WB	1LU	D	767	0.70%	834	634	No	Yes
SW 147 Avenue to SW 137 Avenue	EB	2LD	D	912	1.40%	1,078	1,800	Yes	No
	WB	2LD	D	1,017	1.40%	1,201	1,800	Yes	No
SW 137 Avenue to SW 117 Avenue	EB	2LD	D	1,172	1.40%	1,384	1,800	Yes	No
	WB	2LD	D	1,305	1.40%	1,542	1,800	Yes	No
SW 117 Avenue to US-1	EB	2LD	D	744	1.40%	879	1,890	Yes	No
	WB	2LD	D	828	1.40%	979	1,800	Yes	No

TABLE 21.D.1
FUTURE WITHOUT PROJECT PM PEAK HOUR TRAFFIC CONDITIONS

Roadway Segments	Direction	Number of Lanes in 2036	Adopted LOS Standard [1]	Existing PM peak Hour Directional Volume [2]	Growth Rate [3]	Future without Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume [4]	Met LOS Standard? (Yes / No)	Transportation Deficient? (Yes / No)
SW 200 Street/Quail Roost									
SW 177 Avenue to SW 147 Avenue	EB	1LU	D	343	1.40%	405	730	Yes	No
	WB	1LU	D	382	1.40%	451	730	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	1LU	C	369	1.40%	436	430	No	Yes
	WB	1LU	C	411	1.40%	486	430	No	Yes
SW 137 Avenue to SW 127 Avenue	EB	1LU	E	715	1.40%	845	1,250	Yes	No
	WB	1LU	E	797	1.40%	941	1,313	Yes	No
SW 127 Avenue to SR 821/HEFT	EB	2LD	E	862	1.40%	1,019	2,100	Yes	No
	WB	2LD	E	961	1.40%	1,135	2,100	Yes	No
SW 177 Avenue									
US 27 to SW 2 Street	NB	2LD	C	984	1.94%	1,239	2,390	Yes	No
	SB	2LD	C	1,198	1.94%	1,509	2,510	Yes	No
SW 2 Street to SW 8 Street	NB	2LD	C	1,240	1.94%	1,561	2,390	Yes	No
	SB	2LD	C	1,381	1.94%	1,739	2,510	Yes	No
SW 8 Street to SW 12 Street	NB	2LD	C	1,398	1.94%	1,760	2,510	Yes	No
	SB	2LD	C	1,557	1.94%	1,961	2,390	Yes	No
SW 12 Street to SW 88 Street	NB	2LD	C	1,261	1.94%	1,589	2,510	Yes	No
	SB	2LD	C	1,406	1.94%	1,770	2,510	Yes	No
SW 88 Street to SW 136 Street	NB	2LD	C	1,339	1.94%	1,686	2,510	Yes	No
	SB	2LD	C	1,492	1.94%	1,879	2,510	Yes	No
SW 136 Street to SW 200 Street	NB	2LD	C	1,549	1.35%	1,819	2,510	Yes	No
	SB	2LD	C	1,725	1.35%	2,027	2,510	Yes	No
SW 200 Street to SW 232 Street	NB	2LD	C	1,118	1.35%	1,313	2,510	Yes	No
	SB	2LD	C	1,245	1.35%	1,463	2,510	Yes	No
SW 232 Street to SW 286 Street	NB	2LD	C	1,078	1.35%	1,266	2,510	Yes	No
	SB	2LD	C	1,201	1.35%	1,411	2,510	Yes	No
SW 288 Street to SW 312 Street	NB	2LD	D	839	1.35%	985	1,880	Yes	No
	SB	2LD	D	934	1.35%	1,097	1,880	Yes	No
SW 312 Street to SW 328 Street	NB	1LD	E	674	1.35%	792	1,250	Yes	No
	SB	1LD	E	752	1.35%	883	1,190	Yes	No
SW 162 Avenue									
SW 88 Street to SW 104 Street	NB	2LD	D	534	1.40%	631	1,467	Yes	No
	SB	2LD	D	589	1.40%	696	1,467	Yes	No
SW 136 Street to SW 144 Street	NB	1LU	D	43	0.70%	47	634	Yes	No
	SB	1LU	D	25	0.70%	27	634	Yes	No
SW 144 Street to SW 152 Street	NB	1LU	D	54	0.70%	59	634	Yes	No
	SB	1LU	D	54	0.70%	59	634	Yes	No
SW 157 Avenue									
SW 72 Street to SW 88 Street	NB	3LD	E+20	750	1.40%	886	2,765	Yes	No
	SB	2LD	E+20	835	1.40%	987	1,836	Yes	No
SW 88 Street to SW 120 Street	NB	2LD	D	693	1.40%	819	1,467	Yes	No
	SB	2LD	D	772	1.40%	912	1,540	Yes	No
SW 120 Street to SW 136 Street	NB	2LD	D	864	0.70%	940	1,467	Yes	No
	SB	2LD	D	963	0.70%	1,047	1,467	Yes	No
SW 136 Street to SW 184 Street	NB	2LD	D	881	0.70%	958	1,800	Yes	No
	SB	2LD	D	981	0.70%	1,067	1,800	Yes	No
SW 152 Avenue									
SW 88 Street to Hammocks Blvd	NB	2LD	D	364	1.40%	430	1,540	Yes	No
	SB	2LD	D	442	1.40%	523	1,467	Yes	No
Hammocks Boulevard									
SW 88 Street to SW 104 Avenue	NB	2LD	D	233	1.40%	276	1,467	Yes	No
	SB	2LD	D	260	1.40%	307	1,467	Yes	No
SW 104 Street to SW 147 Street	NB	2LD	D	566	0.70%	616	1,467	Yes	No
	SB	2LD	D	631	0.70%	686	1,467	Yes	No
SW 147 Avenue									
SW 72 Street to SW 88 Street	NB	2LD	D	917	1.40%	1,083	1,890	Yes	No
	SB	2LD	D	823	1.40%	972	1,890	Yes	No
SW 88 Street to SW 104 Street	NB	2LD	D	875	1.40%	1,034	1,890	Yes	No
	SB	2LD	D	786	1.40%	928	1,800	Yes	No
SW 104 Street to SW 120 Street	NB	2LD	D	746	1.40%	881	1,800	Yes	No
	SB	2LD	D	669	1.40%	791	1,800	Yes	No
SW 152 Street to SW 184 Street	NB	1LU	D	445	1.40%	526	709	Yes	No
	SB	1LU	D	399	1.40%	472	709	Yes	No
SW 184 Street to SW 200 Street	NB	1LU	C	640	1.40%	756	784	Yes	No
	SB	1LU	C	574	1.40%	678	598	No	Yes
SW 200 Street to SW 216 Street	NB	1LU	C	445	1.40%	526	598	Yes	No
	SB	1LU	C	400	1.40%	472	598	Yes	No
SW 216 Street to SW 232 Street	NB	1LU	C	361	1.40%	427	598	Yes	No
	SB	1LU	C	324	1.40%	383	598	Yes	No
SW 232 Street to SW 248 Street	NB	1LU	C	321	1.40%	380	598	Yes	No
	SB	1LU	C	289	1.40%	341	598	Yes	No
SW 248 Street to SW 264 Street	NB	1LU	C	436	1.40%	515	598	Yes	No
	SB	1LU	C	486	1.40%	574	598	Yes	No

TABLE 21.D.1
FUTURE WITHOUT PROJECT PM PEAK HOUR TRAFFIC CONDITIONS

Roadway Segments	Direction	Number of Lanes in 2036	Adopted LOS Standard [1]	Existing PM peak Hour Directional Volume [2]	Growth Rate [3]	Future without Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume [4]	Met LOS Standard? (Yes / No)	Transportation Deficient? (Yes / No)
NW/SW 137 Avenue									
SR 836 to SW 8 Street	NB	3LD	D	2,006	1.40%	2,370	3,171	Yes	No
	SB	3LD	D	2,235	1.40%	2,641	3,171	Yes	No
SW 88 Street to SW 104 Street	NB	3LD	D	1,202	1.40%	1,420	2,810	Yes	No
	SB	3LD	D	1,339	1.40%	1,582	2,810	Yes	No
SW 104 Street to SW 120 Street	NB	3LD	D	1,355	1.40%	1,602	2,810	Yes	No
	SB	3LD	D	1,217	1.40%	1,437	2,810	Yes	No
SW 120 Street to SW 136 Street	NB	3LD	D	2,022	1.40%	2,389	2,814	Yes	No
	SB	3LD	D	1,814	1.40%	2,144	2,680	Yes	No
SW 136 Street to SW 152 Street	NB	3LD	D	1,588	1.40%	1,876	3,020	Yes	No
	SB	3LD	D	1,425	1.40%	1,684	3,020	Yes	No
SW 152 Street to SW 184 Street	NB	3LD	D	1,668	1.40%	1,971	3,020	Yes	No
	SB	3LD	D	1,498	1.40%	1,769	3,020	Yes	No
SW 184 Street to SW 200 Street	NB	1LU	D	708	1.40%	837	880	Yes	No
	SB	1LU	D	636	1.40%	751	880	Yes	No
SW 127 Avenue									
SW 88 Street to SW 104 Street	NB	2LD	D	696	1.40%	822	1,800	Yes	No
	SB	2LD	D	775	1.40%	916	1,890	Yes	No
SW 104 Street to SW 128 Street	NB	2LD	D	521	1.40%	615	1,800	Yes	No
	SB	2LD	D	580	1.40%	686	1,890	Yes	No
SW 117 Avenue									
SW 88 Street to SW 112 Street	NB	2LD	D	1,002	1.40%	1,184	1,890	Yes	No
	SB	2LD	D	900	1.40%	1,063	1,890	Yes	No
SW 112 Street to SW 136 Street	NB	2LD	D	1,101	1.40%	1,301	1,890	Yes	No
	SB	2LD	D	989	1.40%	1,168	1,890	Yes	No
SW 136 Street to SW 152 Street	NB	2LD	D	966	1.40%	1,141	1,800	Yes	No
	SB	2LD	D	867	1.40%	1,024	1,800	Yes	No
SW 152 Street to SW 184 Street	NB	2LD	D	924	1.40%	1,092	1,890	Yes	No
	SB	2LD	D	830	1.40%	980	1,800	Yes	No
SW 184 Street to SW 200 Street	NB	1LU	D	537	1.40%	635	675	Yes	No
	SB	1LU	D	482	1.40%	569	675	Yes	No
SR 821/HEFT									
SW 88 Street to SW 120 Street	NB	5LD	D	7,053	2.00%	8,945	10,680	Yes	No
	SB	5LD	D	5,475	2.00%	6,943	10,680	Yes	No
SW 120 Street to SR 874	NB	4LD	D	6,658	2.00%	8,444	8,700	Yes	No
	SB	4LD	D	5,168	2.00%	6,554	8,700	Yes	No
SR 874 to SW 152 Street	NB	6LD	D	12,186	2.00%	15,455	12,520	No	Yes
	SB	6LD	D	9,459	2.00%	11,996	12,520	Yes	No
SW 152 Street to SW 184 Street	NB	6LD	D	9,467	2.00%	12,007	12,520	Yes	No
	SB	6LD	D	7,349	2.00%	9,320	12,520	Yes	No
SW 184 Street to SW 200 Street	NB	5LD	D	7,486	2.00%	9,494	10,680	Yes	No
	SB	5LD	D	6,994	2.00%	8,870	10,680	Yes	No
SR 874									
HEFT to SW 104 Street	NB	3LD	D	2,596	1.40%	3,067	7,080	Yes	No
	SB	3LD	D	4,363	1.40%	5,155	7,080	Yes	No
SW 104 Street to SR 878	NB	3LD	D	2,681	1.40%	3,168	7,080	Yes	No
	SB	3LD	D	4,507	1.40%	5,325	7,080	Yes	No

Notes:

[1] Obtained from 2024 FDOT and MDC Concurrency Data.

[2] Obtained from Table 21.A.3.

[3] Based on the appoved methodology.

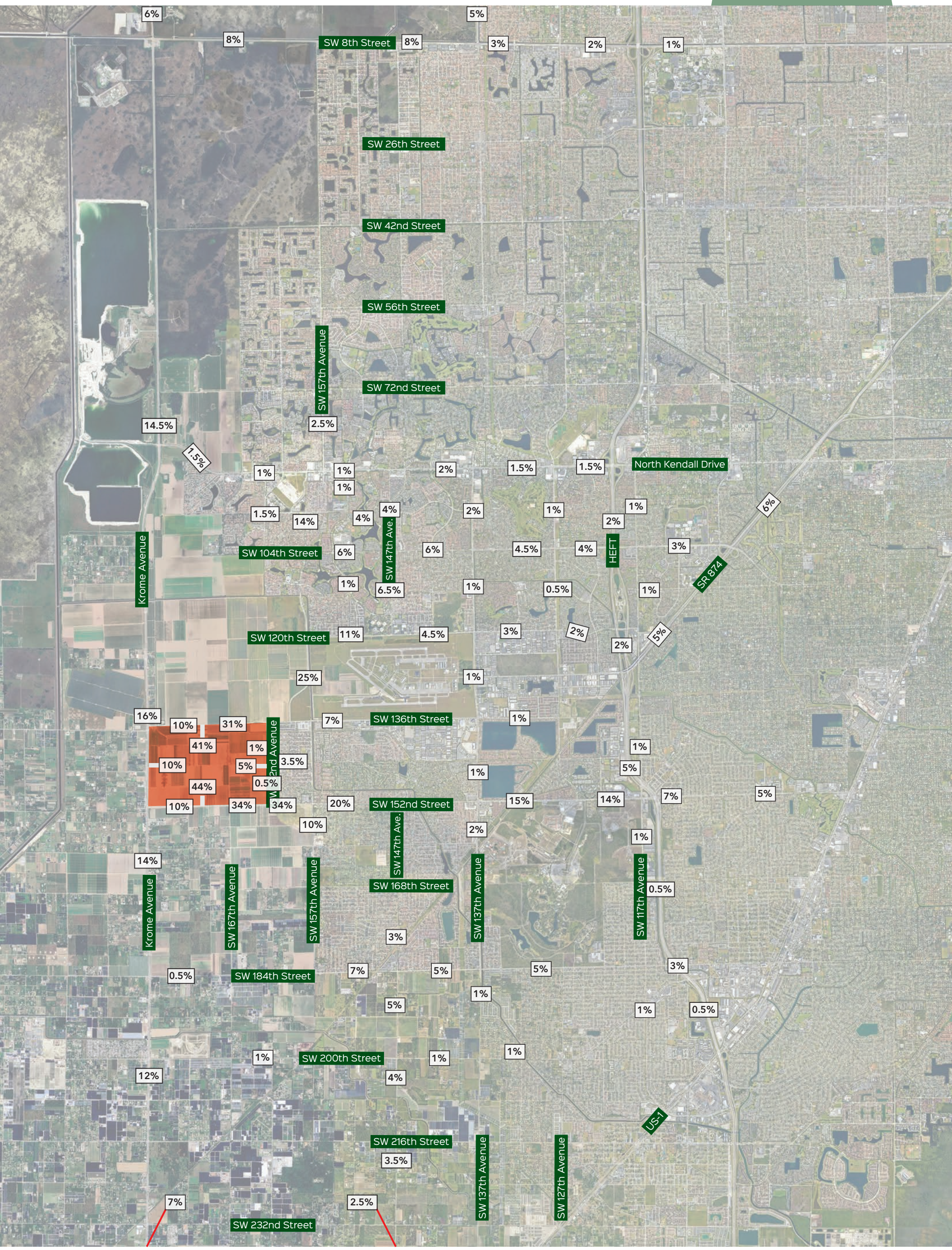
[4] The directional peak hour roadway capacities are obtained from the 2023 FDOT Quality/LOS Handbook. For non-state roadways, the roadway capacities are obtained from the 2020 FDOT Quality/LOS Handbook.

PM peak hour volume exceeds the adopted PM peak hour maximum service volume

E. Assign the trips generated by this development as shown in (B) above and show, on separate maps or tables for each phase-end year, the DRI traffic on each link of the then-existing network within the study area. Include peak-hour directional trips. If local data is available, compare average trip lengths by purpose for the project and local jurisdiction. For the year of build out and at the end of each phase estimate the percent impact, in terms of peak hour directional DRI trips/total peak hour directional trips and in terms of peak hour directional DRI trips/existing peak hour service volume for desired LOS, on each regionally significant roadway in the study area. Identify facility type, number of lanes and projected signal locations for the regionally significant roads.

1. Project Distribution

Net-new external traffic generated by the project was assigned to the adjacent roadway network using the distribution obtained from the SERPM8 model. As agreed upon with the reviewing agencies, vehicular trips were **not** 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. Map J-E1 shows the project traffic distribution within the study area.



Project Location

Map J-E1

Project Trip Distribution

NORTH
MAP NOT TO SCALE

2. Total Traffic Conditions

The City Park DRI project trips were added to the future background traffic from Table 21.D.1 to establish future total traffic conditions for the Year 2036. Table 21.E.1 includes the future with project information outlined below:

- The future lane geometry for study area roadways inclusive of the roadway improvements necessary to connect the project to the existing roadway network.
- The adopted level of service standard for each roadway segment.
- The future without project traffic for the Year 2036 from Table 21.D.1.
- The assignment of PM peak hour DRI project trips from Table 21.A.2.
- The roadway capacity based upon the FDOT 2023 Quality/LOS Handbook or 2020 Q/LOS Handbook.
- Determination if the 2036 future with project traffic volumes are within the directional roadway capacity.
- An evaluation of the City Park DRI trips pursuant to Rule 73C-40.045, F.A.C. to determine if the DRI trips would significantly impact (by 5.0% or greater of the adopted maximum service volume) any state or regionally significant roadway causing it to operate below the adopted level of service standard.

3. Project Impacts on Regionally Significant Roadways

Based on the analysis in Table 21.E.1, the following roadway segments were determined to be significantly impacted with project traffic equal to or exceeding 5.0% of the adopted maximum service volume and operating below the adopted level of service standard. This includes the following roadway segments:

- SW 136th Street from SW 167th Avenue to SW 157th Avenue
- SW 152nd Street from SW 167th Avenue to SW 157th Avenue (Westbound)
- SW 184th Street from SW 157th Avenue to SW 147th Avenue
- SW 200th Street from SW 147th Avenue to SW 137th Avenue
- SW 157th Avenue from SW 120th Street to SW 136th Street
- SW 147th Avenue from SW 184th Street to SW 200th Street
- SW 147th Avenue from SW 248th Street to SW 264th Street (Southbound)

Intersection capacity and levels of service analysis will be completed and submitted for review after the segment analysis is found sufficient.

TABLE 21.E.1
FUTURE WITH PROJECT PM PEAK HOUR TRAFFIC CONDITIONS AND DRI EVALUALTION OF SIGNIFICANT IMPACT

Roadway Segments	Direction	Number of Lanes in 2036	Adopted LOS Standard [1]	Future without Project 2036 PM Peak Hour Directional Volume [2]	Project Two-Way Distribution Percent [3]	Total PM Peak Hour Project Trips [5] 4,817	Future with Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume [6] (MSV)	Project Trips as Percent of MSV	Project Trips ≥ 5% (Yes / No)	Project Trips ≥ 5% and Roadway Exceeds LOS Standard (Yes / No)
SW 8 Street											
SW 187 Avenue to SW 177 Avenue	EB	1LU	C	353	0.50%	12	365	430	2.79%	No	No
	WB	1LU	C	317		12	329	430	2.79%	No	No
SW 177 Avenue to SW 157 Avenue	EB	2LD	C	1,173	8.00%	185	1,358	1,700	10.88%	Yes	No
	WB	2LD	C	1,307		200	1,507	1,874	10.67%	Yes	No
SW 157 Avenue to SW 137 Avenue	EB	3LD	E+20	2,812	8.00%	185	2,997	3,578	5.17%	Yes	No
	WB	3LD	E+20	3,133		200	3,333	3,408	5.87%	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	1,727	3.00%	70	1,797	3,767	1.86%	No	No
	WB	3LD	E+20	1,925		75	2,000	3,767	1.99%	No	No
SW 127 Avenue to HEFT	EB	3LD	E	2,210	2.00%	46	2,256	3,140	1.47%	No	No
	WB	3LD	E	2,463		50	2,513	3,140	1.59%	No	No
HEFT to SW 107 Avenue	EB	3LD	D	2,096	1.00%	23	2,119	2,810	0.82%	No	No
	WB	3LD	D	2,336		25	2,361	2,810	0.89%	No	No
SW 88 Street											
SW 177 Avenue to SW 167 Avenue	EB	2LD	D	1,159	1.50%	35	1,194	1,943	1.80%	No	No
	WB	2LD	D	1,291		37	1,328	1,943	1.90%	No	No
SW 167 Avenue to SW 157 Avenue	EB	3LD	E+20	1,503	1.00%	23	1,526	3,780	0.61%	No	No
	WB	3LD	E+20	1,674		25	1,699	3,780	0.66%	No	No
SW 157 Avenue to SW 147 Avenue	EB	3LD	E+20	2,204	1.00%	23	2,227	3,767	0.61%	No	No
	WB	3LD	E+20	2,455		25	2,480	3,780	0.66%	No	No
SW 147 Avenue to SW 137 Avenue	EB	3LD	D	2,001	2.00%	46	2,047	3,098	1.48%	No	No
	WB	3LD	D	2,229		50	2,279	2,951	1.69%	No	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	2,698	1.50%	35	2,733	3,588	0.98%	No	No
	WB	3LD	E+20	3,006		37	3,043	3,956	0.94%	No	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	3,343	1.50%	35	3,378	4,423	0.79%	No	No
	WB	4LD	E+20	3,724		37	3,761	4,644	0.80%	No	No
SW 104 Street											
SW 157 Avenue to SW 147 Avenue	EB	2LD	E+20	1,101	6.00%	139	1,240	2,257	6.16%	Yes	No
	WB	1LD	E+20	1,227		150	1,377	2,257	6.65%	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	2LD	E+20	1,390	6.00%	139	1,529	2,257	6.16%	Yes	No
	WB	2LD	E+20	1,549		150	1,699	2,257	6.65%	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	E+20	1,777	4.50%	104	1,881	3,348	3.11%	No	No
	WB	3LD	E+20	1,980		113	2,093	3,348	3.38%	No	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	2,304	4.00%	93	2,397	3,348	2.78%	No	No
	WB	3LD	E+20	2,567		100	2,667	3,348	2.99%	No	No
SW 117 Avenue to SR 874	EB	3LD	E+20	2,133	3.00%	70	2,203	3,348	2.09%	No	No
	WB	3LD	E+20	2,377		75	2,452	3,348	2.24%	No	No
SW 120 Street											
SW 157 Avenue to SW 147 Avenue	EB	2LD	D	699	11.00%	254	953	1,800	14.11%	Yes	No
	WB	2LD	D	779		276	1,055	1,800	15.33%	Yes	No
SW 147 Avenue to SW 137 Avenue	EB	2LD	D	1,244	4.50%	104	1,348	1,890	5.50%	Yes	No
	WB	2LD	D	1,386		113	1,499	1,800	6.28%	Yes	No
SW 137 Avenue to SW 122 Avenue	EB	2LD	D	1,259	3.00%	70	1,329	1,800	3.89%	No	No
	WB	2LD	D	1,402		75	1,477	1,800	4.17%	No	No
SW 122 Avenue to SW 117 Avenue	EB	2LD	D	1,559	2.00%	46	1,605	1,467	3.14%	No	No
	WB	2LD	D	1,737		50	1,787	1,540	3.25%	No	No
SW 136 Street											
SW 177 Avenue to SW 167 Avenue	EB	1LU	D	-	10.00%	231	231	675	34.22%	Yes	No
	WB	1LU	D	-		251	251	675	37.19%	Yes	No
SW 167 Avenue to SW 157 Avenue	EB	1LU	D	-	31.00%	717	717	675	106.22%	Yes	Yes
	WB	1LU	D	-		776	776	675	114.96%	Yes	Yes
SW 157 Avenue to SW 137 Avenue	EB	2LD	D	805	7.00%	162	967	1,467	11.04%	Yes	No
	WB	2LD	D	897		175	1,072	1,467	11.93%	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	2LD	D	518	1.00%	23	541	1,467	1.57%	No	No
	WB	2LD	D	577		25	602	1,467	1.70%	No	No
SW 152 Street											
SW 177 Avenue to SW 167 Avenue	EB	1LU	D	-	10.00%	231	231	792	29.17%	Yes	No
	WB	1LU	D	-		251	251	792	31.69%	Yes	No
SW 167 Avenue to SW 157 Avenue	EB	1LU	D	-	34.00%	786	786	792	99.24%	Yes	No
	WB	1LU	D	-		852	852	792	107.58%	Yes	Yes
SW 157 Avenue to SW 137 Avenue	EB	2LD	E+20	1,053	20.00%	462	1,515	1,881	24.56%	Yes	No
	WB	2LD	E+20	1,174		501	1,675	1,975	25.37%	Yes	No
SW 137 Avenue to SW 127 Avenue	EB	3LD	D	1,973	15.00%	347	2,320	2,854	12.16%	Yes	No
	WB	3LD	D	2,198		376	2,574	2,718	13.83%	Yes	No
SW 127 Avenue to SW 117 Avenue	EB	3LD	E+20	2,299	14.00%	324	2,623	3,348	9.68%	Yes	No
	WB	3LD	E+20	2,561		350	2,911	3,348	10.45%	Yes	No
SW 117 Avenue to SW 112 Avenue	EB	2LD	E+20	1,480	7.00%	162	1,642	2,370	6.84%	Yes	No
	WB	2LD	E+20	1,649		175	1,824	2,370	7.38%	Yes	No
SW 112 Avenue to US-1	EB	2LD	E+20	1,271	5.00%	116	1,387	2,672	4.34%	No	No
	WB	2LD	E+20	1,416		125	1,541	2,545	4.91%	No	No
SW 184 Street											
SW 177 Avenue to SW 157 Avenue	EB	1LU	C	685	0.50%	12	697	598	2.01%	No	No
	WB	1LU	C	763		12	775	784	1.53%	No	No
SW 157 Avenue to SW 147 Avenue	EB	1LU	D	749	7.00%	162	911	792	20.45%	Yes	Yes
	WB	1LU	D	834		175	1,009	634	27.62%	Yes	Yes
SW 147 Avenue to SW 137 Avenue	EB	2LD	D	1,078	5.00%	116	1,194	1,800	6.44%	Yes	No
	WB	2LD	D	1,201		125	1,326	1,800	6.94%	Yes	No
SW 137 Avenue to SW 117 Avenue	EB	2LD	D	1,384	5.00%	116	1,500	1,800	6.44%	Yes	No
	WB	2LD	D	1,542		125	1,667	1,800	6.94%	Yes	No
SW 117 Avenue to US-1	EB	2LD	D	879	3.00%	70	949	1,890	3.70%	No	No
	WB	2LD	D	979		75	1,054	1,800	4.17%	No	No
SW 200 Street/Quail Roost											
SW 177 Avenue to SW 147 Avenue	EB	1LU	D	405	1.00%	23	428	730	3.15%	No	No
	WB	1LU	D	451		25	476	730	3.42%	No	No
SW 147 Avenue to SW 137 Avenue	EB	1LU	C	436	1.00%	23	459	430	5.35%	Yes	Yes
	WB	1LU	C	486		25	511	430	5.81%	Yes	Yes
SW 137 Avenue to SW 127 Avenue	EB	1LU	E	845	1.00%	23	868	1,250	1.84%	No	No
	WB	1LU	E	941		25	966	1,313	1.90%	No	No
SW 127 Avenue to SR 821/HEFT	EB	2LD	E	1,019	1.00%	23	1,042	2,100	1.10%	No	No
	WB	2LD	E	1,135		25	1,160	2,100	1.19%	No	No

TABLE 21.E.1
FUTURE WITH PROJECT PM PEAK HOUR TRAFFIC CONDITIONS AND DRI EVALUATION OF SIGNIFICANT IMPACT

Roadway Segments	Direction	Number of Lanes in 2036	Adopted LOS Standard [1]	Future without Project 2036 PM Peak Hour Directional Volume [2]	Project Two-Way Distribution Percent [3]	Total PM Peak Hour Project Trips [5] 4,817	Future with Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume [6] (MSV)	Project Trips as Percent of MSV	Project Trips ≥ 5% (Yes / No)	Project Trips ≥ 5% and Roadway Exceeds LOS Standard (Yes / No)
SW 177 Avenue											
US 27 to SW 2 Street	NB	2LD	C	1,239	5.50%	127	1,366	2,390	5.31%	Yes	No
	SB	2LD	C	1,509		138	1,647	2,510	5.50%	Yes	No
SW 2 Street to SW 8 Street	NB	2LD	C	1,561	6.00%	139	1,700	2,390	5.82%	Yes	No
	SB	2LD	C	1,739		150	1,889	2,510	5.98%	Yes	No
SW 8 Street to SW 12 Street	NB	2LD	C	1,760	14.50%	335	2,095	2,510	13.35%	Yes	No
	SB	2LD	C	1,961		363	2,324	2,390	15.19%	Yes	No
SW 12 Street to SW 88 Street	NB	2LD	C	1,589	14.50%	335	1,924	2,510	13.35%	Yes	No
	SB	2LD	C	1,770		363	2,133	2,510	14.47%	Yes	No
SW 88 Street to SW 136 Street	NB	2LD	C	1,686	16.00%	370	2,056	2,510	14.74%	Yes	No
	SB	2LD	C	1,879		401	2,280	2,510	15.98%	Yes	No
SW 136 Street to SW 200 Street	NB	2LD	C	1,819	14.00%	350	2,169	2,510	13.95%	Yes	No
	SB	2LD	C	2,027		324	2,351	2,510	12.91%	Yes	No
SW 200 Street to SW 232 Street	NB	2LD	C	1,313	12.00%	301	1,614	2,510	11.99%	Yes	No
	SB	2LD	C	1,463		277	1,740	2,510	11.04%	Yes	No
SW 232 Street to SW 288 Street	NB	2LD	C	1,266	7.00%	175	1,441	2,510	6.97%	Yes	No
	SB	2LD	C	1,411		162	1,573	2,510	6.46%	Yes	No
SW 288 Street to SW 312 Street	NB	2LD	D	985	5.00%	125	1,110	1,880	6.65%	Yes	No
	SB	2LD	D	1,097		116	1,213	1,880	6.17%	Yes	No
SW 312 Street to SW 328 Street	NB	1LD	E	792	2.00%	50	842	1,250	4.00%	No	No
	SB	1LD	E	883		46	929	1,190	3.87%	No	No
SW 162 Avenue											
SW 88 Street to SW 104 Street	NB	2LD	D	631	1.50%	35	666	1,467	2.39%	No	No
	SB	2LD	D	696		37	733	1,467	2.52%	No	No
SW 136 Street to SW 144 Street	NB	2LD	D	47	1.00%	23	70	1,467	1.57%	No	No
	SB	2LD	D	27		25	52	1,467	1.70%	No	No
SW 144 Street to SW 152 Street	NB	2LD	D	59	0.50%	12	71	1,467	0.82%	No	No
	SB	2LD	D	59		12	71	1,467	0.82%	No	No
SW 157 Avenue											
SW 72 Street to SW 88 Street	NB	3LD	E+20	886	2.50%	58	944	2,765	2.10%	No	No
	SB	2LD	E+20	987		62	1,049	1,836	3.38%	No	No
SW 88 Street to SW 120 Street	NB	2LD	D	819	14.00%	324	1,143	1,467	22.09%	Yes	No
	SB	2LD	D	912		350	1,262	1,540	22.72%	Yes	No
SW 120 Street to SW 136 Street	NB	2LD	D	940	25.00%	578	1,518	1,467	39.40%	Yes	Yes
	SB	2LD	D	1,047		626	1,673	1,467	42.67%	Yes	Yes
SW 136 Street to SW 184 Street	NB	2LD	D	958	10.00%	251	1,209	1,800	13.94%	Yes	No
	SB	2LD	D	1,067		231	1,298	1,800	12.83%	Yes	No
SW 152 Avenue											
SW 88 Street to Hammocks Blvd	NB	2LD	D	430	1.00%	23	453	1,540	1.49%	No	No
	SB	2LD	D	523		25	548	1,467	1.70%	No	No
Hammocks Boulevard											
SW 88 Street to SW 104 Avenue	NB	2LD	D	276	4.00%	93	369	1,467	6.34%	Yes	No
	SB	2LD	D	307		100	407	1,467	6.82%	Yes	No
SW 104 Street to SW 147 Street	NB	2LD	D	616	1.00%	23	639	1,467	1.57%	No	No
	SB	2LD	D	686		25	711	1,467	1.70%	No	No
SW 147 Avenue											
SW 72 Street to SW 88 Street	NB	2LD	D	1,083	2.00%	46	1,129	1,890	2.43%	No	No
	SB	2LD	D	972		50	1,022	1,890	2.65%	No	No
SW 88 Street to SW 104 Street	NB	2LD	D	1,034	4.00%	93	1,127	1,890	4.92%	No	No
	SB	2LD	D	928		100	1,028	1,800	5.56%	Yes	No
SW 104 Street to SW 120 Street	NB	2LD	D	881	6.50%	150	1,031	1,800	8.33%	Yes	No
	SB	2LD	D	791		163	954	1,800	9.06%	Yes	No
SW 152 Street to SW 184 Street	NB	1LU	D	526	3.00%	75	601	709	10.58%	Yes	No
	SB	1LU	D	472		70	542	709	9.88%	Yes	No
SW 184 Street to SW 200 Street	NB	1LU	C	756	5.00%	125	881	784	15.94%	Yes	Yes
	SB	1LU	C	678		116	794	598	19.41%	Yes	Yes
SW 200 Street to SW 216 Street	NB	1LU	C	526	4.00%	100	626	598	16.73%	Yes	Yes
	SB	1LU	C	472		93	565	598	15.56%	Yes	No
SW 216 Street to SW 232 Street	NB	1LU	C	427	3.50%	88	515	598	14.73%	Yes	No
	SB	1LU	C	383		81	464	598	13.55%	Yes	No
SW 232 Street to SW 248 Street	NB	1LU	C	380	2.50%	62	442	598	10.37%	Yes	No
	SB	1LU	C	341		58	399	598	9.71%	Yes	No
SW 248 Street to SW 264 Street	NB	1LU	C	515	2.00%	50	565	598	8.37%	Yes	No
	SB	1LU	C	574		46	620	598	7.70%	Yes	Yes
NW/SW 137 Avenue											
SR 836 to SW 8 Street	NB	3LD	D	2,370	5.00%	116	2,486	3,171	3.66%	No	No
	SB	3LD	D	2,641		125	2,766	3,171	3.94%	No	No
SW 88 Street to SW 104 Street	NB	3LD	D	1,420	2.00%	46	1,466	2,810	1.64%	No	No
	SB	3LD	D	1,582		50	1,632	2,810	1.78%	No	No
SW 104 Street to SW 120 Street	NB	3LD	D	1,602	1.00%	23	1,625	2,810	0.82%	No	No
	SB	3LD	D	1,437		25	1,462	2,810	0.89%	No	No
SW 120 Street to SW 136 Street	NB	3LD	D	2,389	1.00%	23	2,412	2,814	0.82%	No	No
	SB	3LD	D	2,144		25	2,169	2,680	0.93%	No	No
SW 136 Street to SW 152 Street	NB	3LD	D	1,876	1.00%	23	1,899	3,020	0.76%	No	No
	SB	3LD	D	1,684		25	1,709	3,020	0.83%	No	No
SW 152 Street to SW 184 Street	NB	3LD	D	1,971	2.00%	50	2,021	3,020	1.66%	No	No
	SB	3LD	D	1,769		46	1,815	3,020	1.52%	No	No
SW 184 Street to SW 200 Street	NB	1LU	D	837	1.00%	25	862	880	2.84%	No	No
	SB	1LU	D	751		23	774	880	2.61%	No	No
SW 127 Avenue											
SW 88 Street to SW 104 Street	NB	2LD	D	822	1.00%	23	845	1,800	1.28%	No	No
	SB	2LD	D	916		25	941	1,890	1.32%	No	No
SW 104 Street to SW 128 Street	NB	2LD	D	615	1.00%	23	638	1,800	1.28%	No	No
	SB	2LD	D	686		25	711	1,890	1.32%	No	No

TABLE 21.E.1
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Roadway Segments	Direction	Number of Lanes in 2036	Adopted LOS Standard [1]	Future without Project 2036 PM Peak Hour Directional Volume [2]	Project Two-Way Distribution Percent [3]	Total PM Peak Hour Project Trips [5] 4,817	Future with Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume [6] (MSV)	Project Trips as Percent of MSV	Project Trips ≥ 5% (Yes / No)	Project Trips ≥ 5% and Roadway Exceeds LOS Standard (Yes / No)
SW 117 Avenue											
SW 88 Street to SW 112 Street	NB	2LD	D	1,184	1.00%	23	1,207	1,890	1.22%	No	No
	SB	2LD	D	1,063		25	1,088	1,890	1.32%	No	No
SW 112 Street to SW 136 Street	NB	2LD	D	1,301	1.00%	23	1,324	1,890	1.22%	No	No
	SB	2LD	D	1,168		25	1,193	1,890	1.32%	No	No
SW 136 Street to SW 152 Street	NB	2LD	D	1,141	1.00%	23	1,164	1,800	1.28%	No	No
	SB	2LD	D	1,024		25	1,049	1,800	1.39%	No	No
SW 152 Street to SW 184 Street	NB	2LD	D	1,092	1.00%	25	1,117	1,890	1.32%	No	No
	SB	2LD	D	980		23	1,003	1,800	1.28%	No	No
SW 184 Street to SW 200 Street	NB	1LU	D	635	1.00%	25	660	675	3.70%	No	No
	SB	1LU	D	569		23	592	675	3.41%	No	No
SR 821/HEFT											
SW 88 Street to SW 120 Street	NB	5LD	D	8,945	2.00%	46	8,991	10,680	0.43%	No	No
	SB	5LD	D	6,943		50	6,993	10,680	0.47%	No	No
SW 120 Street to SR 874	NB	4LD	D	8,444	2.00%	46	8,490	8,700	0.53%	No	No
	SB	4LD	D	6,554		50	6,604	8,700	0.57%	No	No
SR 874 to SW 152 Street	NB	6LD	D	15,455	5.00%	116	15,571	12,520	0.93%	No	No
	SB	6LD	D	11,996		125	12,121	12,520	1.00%	No	No
SW 152 Street to SW 184 Street	NB	6LD	D	12,007	0.50%	12	12,019	12,520	0.10%	No	No
	SB	6LD	D	9,320		12	9,332	12,520	0.10%	No	No
SW 184 Street to SW 200 Street	NB	5LD	D	9,494	0.50%	12	9,506	10,680	0.11%	No	No
	SB	5LD	D	8,870		12	8,882	10,680	0.11%	No	No
SR 874											
HEFT to SW 104 Street	NB	3LD	D	3,067	5.00%	116	3,183	7,080	1.64%	No	No
	SB	3LD	D	5,155		125	5,280	7,080	1.77%	No	No
SW 104 Street to SR 878	NB	3LD	D	3,168	6.00%	139	3,307	7,080	1.96%	No	No
	SB	3LD	D	5,325		150	5,475	7,080	2.12%	No	No

Notes:

[1] LOS obtained from 2024 FDOT and MDC Concurrency Data.

[2] Obtained from Table 21.D.1.

[3] Distribution obtained from SERPM model runs.

[4] Directional splits are based on the net new trip generation inbound / outbound ratio.

[5] Refer to Section 21B for project trip generation.

[6] The directional peak hour roadway capacities are obtained from the 2023 FDOT Quality / LOS Handbook. For non-state roadways, the roadway capacities are obtained from the 2020 FDOT Quality / LOS Handbook.

Project trips are equal to or exceed 5.0% of the adopted PM peak hour maximum service volume and PM peak hour volume exceeds the adopted PM peak hour maximum service volume

4. Project Impacts on Regionally Significant Interchanges

Interchange ramps are critical to the traffic impact study area and are identified as those which are projected to carry project traffic greater than 200 vehicles per hour per lane (VPHPL). Based upon the project traffic assignment, the ramps have been evaluated for significance as demonstrated in Table 21.E.2. No interchange ramps were found to be significant within the project area.

Table 21.E.2 - Ramp Significance

Ramp	Number of Lanes	Project Distribution	PM Peak Hour Project Trips	Over 200 VPHPL Yes or No?
HEFT @ SW 88th Street SB Off-ramp	2	0.0%	1	No
HEFT @ SW 88th Street NB On-ramp	2	0.3%	14	No
HEFT @ SW 120th Street SB Off-ramp	2	0.3%	12	No
HEFT @ SW 120th Street NB On-ramp	1	0.3%	14	No
HEFT @ SR 874 SB Off-ramp	3	2.1%	99	No
HEFT @ SR 874 NB On-ramp	3	3.1%	148	No
HEFT @ SW 117th Avenue SB Off-ramp	3	2.8%	133	No
HEFT @ SW 117th Avenue NB On-ramp	2	3.1%	148	No
HEFT @ SW 152nd Street SB Off-ramp	3	2.1%	99	No
HEFT @ SW 152nd Street SB On-ramp	2	0.0%	0	No
HEFT @ SW 152nd Street NB Off-ramp	2	0.3%	14	No
HEFT @ SW 152nd Street NB On-ramp	3	0.3%	14	No
HEFT @ SW 184th Street NB Off-ramp	1	0.3%	14	No
HEFT @ SW 184th Street SB On-ramp	2	0.1%	5	No

F. Based on the assignment of trips as shown in (E) above, what modifications in the highway network (including intersections) will be necessary at the end of each phase of development, to attain and maintain local and regional level of service standards? Identify which of the above improvements are required by traffic not associated with the DRI at the end of each phase. For those improvements which will be needed earlier as a result of the DRI, indicate how much earlier. Where applicable, identify Transportation System Management (TSM) alternatives (e.g., signalization, one-way pairs, ridesharing, etc.) that will be used and any other measures necessary to mitigate other impacts such as increased maintenance due to a large number of truck movements.

Pursuant to Chapter 163.3180, F.S., roadway segments that are projected to operate below the adopted level of service standard without the project are deemed to be "transportation deficient." Table 21.F.1 shows the roadway segments (and corresponding improvements) that are transportation deficient, coincident with the 2036 buildout year.

The roadway improvements needed to address the transportation deficiencies are identified in Table 21.F.1. In accordance with Chapter 163.3180, F.S., the improvement necessary to correct the transportation deficiency is the funding responsibility of the entity that has maintenance responsibility for that facility. The project is not responsible to help improve or eliminate deficiencies that are projected without the project.

The project is deemed to have significant and adverse impact on a roadway segment if the project's consumption of the roadway service volume is five percent (5%) or greater and the total directional volume exceeds the roadway service volume, respectively. Transportation deficient roadways are brought into the adopted LOS standard compliance prior to this evaluation. The project is expected to have significant and adverse impact on the roadways in Table 21.F.1.

The following roadway improvement is needed to address the transportation deficient roadway segments at existing conditions where the project is significant:

- SW 184th Street from SW 157th Avenue to SW 147th Avenue; widen from 2 lanes to 4 lanes.

The necessary funding for this improvement is the responsibility of the maintaining agency.

The following roadway improvements are needed to address the transportation deficient roadway segments at future without project conditions where the project is significant:

- SW 200th Street from SW 147th Avenue to SW 137th Avenue; widen from 2 lanes to 4 lanes.
- SW 147th Avenue from SW 184th Street to SW 200th Street, widen from 2 lanes to 4 lanes

The necessary funding for these improvements are the responsibility of the maintaining agency.

The following roadway improvements are needed to address the transportation deficient roadway segments at future with project conditions where the project is significant:

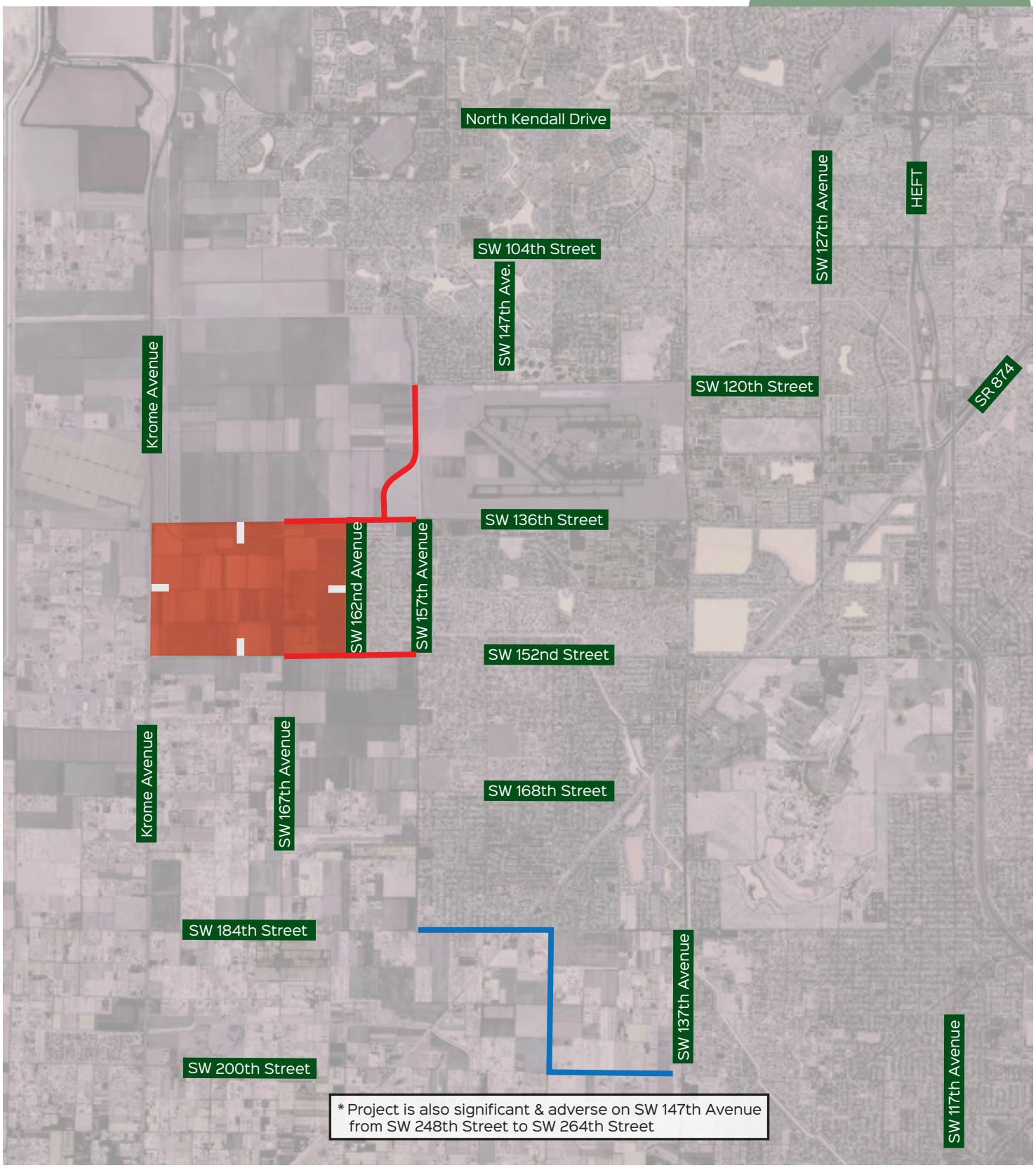
- SW 136th Street from SW 167th Avenue to SW 157th Avenue; new 4 lane roadway.
- SW 152nd Street from SW 167th Avenue to SW 157th Avenue; new 4 lane roadway.
- SW 157th Avenue from SW 120th Street to SW 136th Street; widen from 4 lanes to 6 lanes.
- SW 147th Avenue from SW 248th Street to SW 264th Street; widen from 2 lanes to 4 lanes.

The roadway improvements needed to accommodate area-wide traffic with the project coincident with buildout year 2036 are depicted in Map J-F1.

TABLE 21.F.1
FUTURE WITHOUT PRJOECT AND FUTURE WITH PROJECT TRANSPORTATION DEFICIENT ROADWAYS

Roadway Segments	Direction	Number of Lanes in 2036	Adopted LOS Standard[1]	Future without Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume	Met LOS Standard? (Yes / No)	Number of Lanes Needed without Project	Proposed Maximum Service Volume	Met LOS Standard? (Yes / No)	Future with Project 2036 PM Peak Hour Directional Volume	Maximum Service Volume	Met LOS Standard? (Yes / No)	Number of Lanes Needed with Project	Proposed Maximum Service Volume	Met LOS Standard? (Yes / No)
SW 136 Street															
SW 167 Avenue to SW 157 Avenue	EB	1LU	D	-	-	-	-	-	-	717	675	No	2LD	1,467	Yes
	WB	1LU	D	-	-	-	-	-	-	776	675	No	2LD	1,467	Yes
SW 152 Street															
SW 167 Avenue to SW 157 Avenue	EB	1LU	D	-	-	-	-	-	-	786	792	Yes	2LD	1,800	Yes
	WB	1LU	D	-	-	-	-	-	-	852	792	No	2LD	1,800	Yes
SW 184 Street															
SW 157 Avenue to SW 147 Avenue	EB	1LU	D	749	792	Yes	2LD	1,800	Yes	911	1,800	Yes	-	-	-
	WB	1LU	D	834	634	No	2LD	1,440	Yes	1,009	1,440	Yes	-	-	-
SW 200 Street/Quail Roost															
SW 147 Avenue to SW 137 Avenue	EB	1LU	C	436	430	No	2LD	2,390	Yes	459	2,390	Yes	-	-	-
	WB	1LU	C	486	430	No	2LD	2,390	Yes	511	2,390	Yes	-	-	-
SW 157 Avenue															
SW 120 Street to SW 136 Street	NB	2LD	D	940	1,467	Yes	2LD	1,467	Yes	1,558	1,467	No	3LD	2,268	Yes
	SB	2LD	D	1,047	1,467	Yes	2LD	1,467	Yes	1,673	1,467	No	3LD	2,268	Yes
SW 147 Avenue															
SW 184 Street to SW 200 Street	NB	1LU	C	756	784	Yes	2LD	1,805	Yes	881	1,805	Yes	-	-	-
	SB	1LU	C	678	598	No	2LD	1,375	Yes	794	1,375	Yes	-	-	-
SW 248 Street to SW 264 Street	NB	1LU	C	515	598	Yes	1LU	598	Yes	565	598	Yes	2LD	1,375	Yes
	SB	1LU	C	574	598	Yes	1LU	598	Yes	620	598	No	2LD	1,375	Yes

Notes:
[1]Obtained from 2024 FDOT and MDC Concurrency Data.
Future without Project Transportation Deficient Roadways
Project Significant and Adverse Roadways



Project Location

Future Without Project

Future With Project

Map J-F1

Transportation Deficient Roadways

NORTH

MAP NOT TO SCALE

G. Identify the anticipated number and general location of access points for driveways, median openings and roadways necessary to accommodate the proposed development. Describe how the Applicant's access plan will minimize the impacts of the proposed development and preserve or enhance traffic flow on the existing and proposed transportation system. This information will assist the Applicant and governmental agencies in reaching conceptual agreement regarding the anticipated access points. While the ADA may constitute a conceptual review for access points, it is not a permit application and, therefore, the Applicant is not required to include specific design requirements (geometry) until the time of permit application.

Map J-G1 illustrates the location of the general access points for project traffic along the section line and half section line roads that will provide frontage to each portion of the DRI. The project access locations identified in Map J-G1, (and other access locations as may be needed) are subject to meeting the design and permitting standards and guidelines from MDC and FDOT as applicable based upon the agency with jurisdiction over the adjacent roadway.

The development of the City Park DRI will require the construction of some section line and half section line roadways as outlined in Table 21.G.1 below. The Applicant will dedicate the required right-of-way to complete the section line and half section line roadway network adjacent to the project, and will construct those roadway sections as required by County Code.

Table 21.G.1 – Roadway Sections Providing Site Access

Roadway	Limits	Required Right of Way[1]
SW 136 Street	SW 177 Avenue to SW 162 Avenue	Minimum of 80' of ROW
SW 152 Street	SW 177 Avenue to SW 162 Avenue	Minimum of 110' of ROW
SW 162 Avenue	SW 136 Street to SW 152 Street	Minimum of 70' of ROW

[1]Based on Section 33-133 of the Miami-Dade County Code of Ordinances.

Map J-G1

Project Access Locations

NORTH
MAP NOT TO SCALE

H. If applicable, describe how the project will complement the protection of existing, or development of proposed, transportation corridors designated by local governments in their comprehensive plans. In addition, identify what commitments will be made to protect the designated corridors such as inter local agreements, right-of-way dedication, building set-backs, etc.

The response to Section H will be provided once the segment analysis is found sufficient.

I. What provisions, including but not limited to sidewalks, bicycle paths, internal shuttles, ridesharing and public transit, will be made for the movement of people by means other than private automobile? Refer to internal design, site planning, parking provisions, location, etc.

1. Access to Regional Transit

The project is situated close to the West Kendall corridor of the Strategic Miami Area Rapid Transit (SMART) plan. The closest MDC bus routes to the project are 152 and 137. The project is also being designed around a **multimodal transportation framework**, including a **transit-oriented development (TOD) node** aligned with CSX Portland Spur and SMART Plan. The project proposes a **mobility hub**, walkable street grid, bikeways, and pedestrian paths that will tie into the nearby transportation network and reduce automobile dependency.

2. Access to Local Transit - Metrobus Route 152

The neighborhood located immediately to the east of the City Park DRI is currently served by Miami-Dade Transit Service via Metrobus Route 152 (see Appendix 21.I for transit system maps). Route 152 already travels on SW 152nd Street to SW 152nd Avenue, approximately one mile east of the project. The Applicant has identified the potential to extend this service westward to service the proposed DRI land uses. City Park is also committed to work with Miami-Dade Transit to develop new routes and/or provide route extensions to serve the community.

3. Pedestrian and Cyclist Infrastructure

City Park will be focused on multimodal transportation options which include extensive pedestrian and bike networks and with linkage to the regional transportation networks. The project will provide the following pedestrian and cyclist infrastructure:

- Sidewalks - approximately 24 miles
- Bike lanes - approximately 23 miles
- Bike routes - approximately 8,000 feet
- Class 1 trails (off-street trails intended for pedestrian and cyclist use) - approximately 9 miles

Refer to Map J-I1 for the proposed bike network and class 1 trails.

Map J-I1

Pedestrian & Cyclist Infrastructure

NORTH
MAP NOT TO SCALE

4. Transportation Demand Management

In addition to maximizing access to transit, the Applicant will promote the benefit of Transportation Demand Management (TDM) programs to further reduce the future reliance upon the single occupant vehicle (SOV). Each TDM program should include a reasonable and effective combination of TDM strategies appropriate to the size, scale and location of the proposed development which shall be used to demonstrate that practical actions can be taken to reduce the number of SOV generated by the proposed development site. A series of TDM options which promote the use of alternative travel modes are listed below. The Applicant will work with South Florida Commuter Services to refine a TDM plan which best fits the needs of the individual project site.

- Staggered work schedules: The DRI can promote the benefits of staggered work schedules in reducing the number of SOV traveling during the traditional morning and afternoon peak hours. The DRI can request that individual tenants/employers/owners provide themselves and their employees the flexibility to stagger their arrival and departure times between the hours of 6:30 am to 9:30 am, and 3:30 pm to 6:30 pm to reduce traffic during the peak travel hours and more evenly distribute the volume of traffic into and out of the site. Staggered lunch hours would also be incorporated into this staggered schedule framework.

- Flex-time: The DRI can promote the benefits of flex time in reducing the number of SOV traveling during the traditional morning and afternoon peak hours. The DRI can request that individual tenants/employers/owners provide themselves and their employees the ability to utilize flexible working schedules (within designated guidelines) to meet personal needs and commitments. The employee can schedule five (5) 8-hour work days using varying start and stop times as well as extended lunch times.

- Compressed Work Weeks: The DRI can promote the benefits of compressed work weeks in reducing the number of SOV traveling during the traditional morning and afternoon peak hours. The DRI can request that individual tenants/employers/owners provide themselves and their employees the ability to utilize compressed work week schedules (within designated guidelines). The employer and/or employee can work four (4) 10-hour days, or can choose to work four and a half (4 ½) days or three and a half (3 ½) days as negotiated with each employee or business owner.

- Work from Home: The DRI can promote the benefits of work from home, thus reducing the number of SOV traveling during the traditional morning and afternoon peak hours. Work from Home may be used by employers and employees in combination with staggered work schedules, flex time and compressed work weeks.

- Shower and Locker Facilities: The DRI can encourage employers to provide on-site shower and locker facilities within the development site to offer bicycle, pedestrian, and transit riders amenities to complement their choice to use the alternative travel modes. Long term bicycle parking should also be provided with this option.

- Ridesharing Incentive Programs: The DRI can promote the benefits of ridesharing (in coordination with South Florida Commuter Services), and can provide rideshare

postings for those employers and employees interested in finding potential ridesharing partners. These rideshare postings are intended to offer geographic commuter information for those employees who may be interested in sharing rides with fellow employees who live in similar geographic areas. Additional incentives may include payments or subsidies for fuel and tolls and preferential on-site parking for ride share users.

  - Car Pool Spaces: The designation of car pool parking spaces can be provided on-site in desirable and convenient parking locations restricted for use only by car pool vehicles. These spaces shall be non-handicapped employee parking spaces located closest to the building entrance with signage identifying each space as car pool. Procedures shall be included whereby the car pool vehicles are registered with the Employer TDM Coordinator for easy tracking and monitoring, and for use in annual reporting and management procedures.

  - Van Pools: The designation of van pool parking spaces can be provided on site in desirable and convenient parking locations restricted for use only by van pool vehicles. These spaces shall be non-handicapped employee parking spaces located closest to the building entrance with signage identifying each space as van pool. Procedures shall be included whereby the van pool vehicles are registered with the Employer TDM Coordinator to keep track of the number of employees who van pool on a daily basis for use in annual reporting and management.

- Public Transit Service Improvements: The provision of transit shuttle services to and from convenient public transit sites, such as a shuttle to and from the nearest Premium Transit Rail Station, to accommodate morning, midday, and evening transit demand.

- Public Transit Infrastructure Improvements: The construction of on-site transit shelters, amenities, stops, drop off locations or pull-out bays and patron parking to serve the transit stops and stations.

- Public Transit Incentives: The provision of transit fare subsidies and other similar incentive programs designed to make public transit more accessible to the occupants of the proposed use. Promote and encourage project employers to take advantage of the employee discount programs, employer subsidy programs, and pre-tax set-asides for transit fares (as allowable under IRS rules) through the coordination and informational efforts of the South Florida Commuter Services.

- Informational Kiosks: The DRI can provide a centralized location within the development site for the posting of TDM Program Information, local bus and train schedules, South Florida Commuter Services, the name and phone number of the DRI Representative serving as the Employee Transportation Coordinator, information on flex time, compressed work weeks and telecommuting, and information on places to eat or shop within shuttle and/or walking distance of the project site.

22. AIR IMPACTS

A. Document the steps which will be taken to contain fugitive dust during site preparation and construction of the project. If site preparation includes demolition activities, provide a copy of any notice of demolition sent to the Florida Department of Environmental Protection (FDEP) as required by the National Emissions Standards for Asbestos, 40 CFR Part 61, Subpart M.

Fugitive dust from site preparation and from wind erosion will cause minor short-term air quality impacts during the construction period. To reduce any adverse effects, cleared and disturbed areas will be periodically sprayed with water where appropriate after clearing. After completion of construction, all project areas will be grassed, mulched, or paved depending on land use, thus containing fugitive dust. It is anticipated, however, that the exhaust from automobiles will be the principal post-construction source of emission.

The current and historical use of the site is agricultural cultivation. Other than the row crops that are grown during certain times of the year, the site is vacant. Development of the site does not require any demolition. Therefore, no notice of demolition is required.

B. Specify structural or operational measures that will be implemented by the development to minimize air quality impacts (e.g. road widening and other traffic flow improvements on existing roadways, etc.). Any roadway improvements identified here should be consistent with those utilized in Question 21, Transportation.

This information will be provided after the transportation analysis has been reviewed and determined to be sufficient.

C. Complete Table 22-1 for all substantially impacted intersections within the study area, as defined in Map J, and all parking facilities associated with the project. Using the guidance supplied or approved by the Florida Department of Environmental Protection, determine if detailed air quality modeling for carbon monoxide (CO) is to be completed for any of the facilities listed in the table.

This information will be provided after the transportation analysis has been reviewed and determined to be sufficient, and the Applicant has met with DERM and FDEP to determine which intersections and parking facilities are substantially impacted by project traffic. FDEP guidelines require that all LOS E and F intersections impacted by 5% or more of project traffic, and surface parking areas accommodating 1500 vehicle trips per hour, or parking garages accommodating 750 vehicles per hour be considered for air quality modeling.

D. If detailed modeling is required, estimate the worst case one-hour and eight-hour CO concentrations expected for each phase through buildout for comparison with the state and federal ambient air quality standards. Utilize methodology supplied or approved by the Florida Department of Environmental Protection for making such estimates. Submit all air quality modeling input and output data along with associated calculations to support the modeling and explain any deviations from guidance. Provide drawings of site geometry and coordinate information for each area modeled. Show the location of the sources and receptor sites.

Modeling assumptions should consider federal, state, and local government programmed link and intersection improvements with respect to project phasing. Any roadway improvements utilized in the model should be consistent with those used in Question 21, Transportation. Provide verification of any assumptions in the modeling which consider such programmed improvements. It is recommended that air quality analyses be completed concurrently and in conjunction with the traffic analyses for the project.

If applicable, this information will be provided after the transportation analysis has been reviewed and determined to be sufficient, and the Applicant has met with DERM and FDEP to determine which intersections and parking facilities need to be modeled and have established parameters for the carbon monoxide analysis.

E. If initial detailed modeling shows projected exceedance(s) of ambient air quality standards, identify appropriate mitigation measures and provide assurances that appropriate mitigating measures will be employed so as to maintain compliance with air quality standards. Submit further modeling demonstrating the adequacy of such measures.

This information will be provided after the transportation analysis has been reviewed and determined to be sufficient, and the modeling (if applicable) has been completed.

23. HURRICANE PREPAREDNESS

A. 1. Identify any residential development proposed within the hurricane vulnerability zone delineated in the applicable regional hurricane evacuation study, regional public hurricane shelter study or adopted county peacetime emergency plan. If so, delineate the proposed development's location on the appropriate county and/or regional hurricane evacuation map and respond to questions B.(1) and B.(2) below. Proposed mobile home and park trailer developments should answer question B.(1), regardless of location, or answer questions B.(1) and B.(2) below, if proposed within the hurricane vulnerability zone or the high hazard hurricane evacuation area.

City Park does not propose residential development within a hurricane vulnerability zone delineated in the applicable regional hurricane evacuation study, regional public hurricane shelter study or adopted county peacetime emergency plan. Storm-surge mapping indicates the City Park site is within the County's Storm Surge Planning Zone D (characterized as "at risk for storm surge for Category 4 storms"), and the National Hurricane Center (NHC) storm-surge risk mapping shows projected surge depths at the site of less than 3 feet above grade for a Category 4 event and greater than 6 feet above grade for a Category 5 event. Current ground elevations across the site are generally in the 8′–9′ NGVD range. Under the currently proposed grading concept the site will be raised to approximately 9.5′–10.0′ NGVD with typical finished floor elevations at 10.5′–11.0′ NGVD for residential structures. Raising site grades and providing finished floors at the elevations noted will substantially reduce the likelihood of direct inundation during a Category 4 surge event compared to existing conditions.

A. 2. Identify any hotel/motel or recreational vehicle/travel trailer development proposed within the high hazard hurricane evacuation area delineated in the applicable regional hurricane evacuation study, regional public hurricane shelter study, or adopted county peacetime emergency plan. If present, delineate the proposed development's location on the appropriate county or regional hurricane evacuation map and answer questions B.(1) and B.(2) below.

City Park does not propose hotel/motel or recreational vehicle/travel trailer development.

A. 3. Identify whether the proposed development is located in a designated special hurricane preparedness district.

City Park is not within a designated special hurricane preparedness district.

B. 1. For each phase of the development, determine the development's public hurricane shelter space requirements based on the behavioral assumptions identified in the applicable regional study or county plan. Identify the existing public hurricane shelter space capacity during the one hundred year or category three hurricane event within the county where the development is being proposed and indicate whether the county has a deficit or surplus of public hurricane shelter space during the one hundred year or category three hurricane event.

Participation rates and destination percentages (including the percent of evacuees using local public shelter space), are shown in Table 23.1A. Data on behavioral assumptions, specifically related to the number of persons and vehicles per occupied dwelling unit, were obtained from the Year 2020 census data for the metropolitan area.

Given the fact that the project site is not located within a designated hurricane evacuation zone and therefore no evacuations would be mandatory, the proposed development (at buildout) was estimated to add 1,065 public shelter evacuees in the event that 50% of the project chose to evacuate. Tables 23.1A summarize the assumptions and calculated statistics for the number of project generated evacuating vehicles and project generated public shelter demand assuming that 50% (Table 23.1A) of the units chose to evacuate. Given the character of the proposed development and its location completely outside any of the evacuation storm surge zones, it is unlikely that evacuation rates would reach even the levels studied herein. Homebuilding design in this project will be required to meet all applicable Florida Building Code Standards, and will be required to provide code compliance window protection for all residential and non residential buildings on site.

TABLE 23.1A
CITY PARK
HURRICANE EVACUATION SHELTER SPACE ANALYSIS

Evacuation Vehicles Generated by Project			
Dwelling Units	7800	residential du's	
	0	hotel rooms	
Evacuation Participation Rate/			
Category 3 Hurricane	**50%**	of units	
Vehicles per Unit	1.75	vehicles per permanent unit	
	1.05	vehicles per occupied seasonal unit	
Evacuation Vehicle Usage Rate	60%	of permanent unit vehicles	
	100%	of seasonal unit vehicles	
Seasonal Unit Occupancy Levels	35%	low seasonal occupancy	
	95%	high seasonal occupancy	
Additional Evacuation Vehicles	**Category 3**		
Generated by Project	**4095**	evac vehicles	
Public Shelter Demand Generated by Project			
People per Unit	2.73	people per permanent unit	
	2.73	people per occupied seasonal unit	
Percent of Evacuees to	10%	of permanent resident evacuees (remainder to local homes of friends/relatives or out of county)	
Local Public Shelter	2%	of seasonal resident evacuees (remainder to out of county destinations)	
Additional Public Shelter Demand	**Category 3**		
Generated by Project	**1065**	people	

Based on the most recent publicly available sources, the estimates the of current evacuation demand capacity is approximately 125,000 public shelter spaces including primary, secondary and tertiary shelter spaces.

The development program for the City Park DRI includes a High School which will be designed to serve a dual purpose as Hurricane Evacuation Shelter. The facility is anticipated to increase the Miami-Dade County Shelter Capacity by 1,100 persons, thus the project will provide adequate shelter capacity for its residents in the unlikely event that 50% of City Park chooses to evacuate.

Given the County's current shelter capacity and the additional shelter space that the Applicant will provide on site, it is anticipated that the proposed development will have little adverse impact on the availability of hurricane shelter space in Miami-Dade County, and may in fact increase the availability of hurricane evacuation center capacity for Miami-Dade residents.

B. 2. For each phase of the development, determine the number of evacuating vehicles the development would generate during a hurricane evacuation event based on the transportation and behavioral assumptions identified in the applicable regional study or county plan. Identify the nearest designated hurricane evacuation route and determine what percentage of level of service E hourly directional and maximum service volume the project will utilize.

The City Park property is not in a hurricane vulnerability zone as defined in Section 73C-40.0256 (2)(f), F.A.C., and thus is not subject to the mitigation provisions set forth in Section 73C-40.0256 (4), F.A.C.

See also Applicant's response to Question 23 C, below.

C. Identify and describe any action(s) or provisions that will be undertaken to mitigate impacts on hurricane preparedness.

73C-40.0256, F.A.C., Hurricane Preparedness Policy Rule, establishes how the state land planning agency will evaluate the impacts of a proposed development on hurricane preparedness in the review of applications for development approval. Section 73C-40.0256 (5), F.A.C. references the requirements of Section 380.06(15)(e) 2., F.S. which prohibits the approval of a DRI if the local government does not make adequate provision for the public facilities needed to accommodate the project's impacts. That provision in turn references Section 380.06(15)(e) 1., F.S, which provides as follows;

> A local government shall not include, as a development order condition for a development of regional impact, any requirement that a developer contribute or pay for land acquisition or construction or expansion of public facilities or portions thereof unless the local government has enacted a local ordinance which requires other development not subject to this section to contribute its proportionate share of the funds, land, or public facilities necessary to accommodate any impacts having a rational nexus to the proposed development, and the need to construct new facilities or add to the present system of public facilities must be reasonably attributable to the proposed development.

Miami-Dade County has not enacted an ordinance which requires non-DRI development to contribute its proportionate share of funds, land, or public facilities to mitigate impacts on hurricane preparedness. Thus, City Park is not required to mitigate such impacts.

Notwithstanding Section 380.06(15)(e) 1., F.S,, the development program for the City Park DRI voluntarily commits to provide a High School which will be designed to serve a dual purpose as Hurricane Evacuation Shelter, as a good faith proposal to mitigate impacts on hurricane shelter availability. The facility is anticipated to increase the Miami-Dade County Shelter Capacity by 1,500 persons, which will be more than adequate to accommodate the projected 1,491 public shelter evacuees in the unlikely event that 70% of the City Park population chooses to evacuate.

In addition, notwithstanding Section 380.06(15)(e)1., F.S, the development program for the City Park DRI includes the following voluntary commitments as a good faith proposal to mitigate impacts on hurricane evacuation. The City Park development program includes the following:

- Provide 1,100 shelter space for City Park residents

- Establishment and maintenance of a public information program in the City Park property owner associations / homeowners associations for the purpose of educating the development's residents regarding the potential hurricane threat; the need for timely evacuation in the event of an impending hurricane; the availability and location of hurricane shelters; and the identification of steps to minimize property damage and to protect human life. Such program will comply with the requirements of Section 73C-40.0256 (5)(b)1., F.A.C.

- Elevation of all roads within the proposed development above the anticipated category three hurricane flood levels.

D. Additional Comments from Review Agencies

The Applicant shall answer Question 20 [sic 23] 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 obsolescense or another reason, then the SFRPC may use an alternative model which is mutually acceptable to the SFRPC and the Applicant.

The SFRPC has indicated the TIME model is not available for use and has not proposed an alternative. Therefore, the Applicant has responded to Question 23 – Hurricane Preparedness using available information.

24. HOUSING

A.1 If the proposed development contains residential, provide the following information on Table for each Phase of Development.

The residential development program for City Park DRI will be comprised of single-family (homeownership), townhome (homeownership) and multifamily rental apartments. **Table 24-A.1** shows the number of units in the program by tenure and price/rental range.

Table 24-A.1
Dwelling Units by Tenure and Price/Rental Rate

Single-Family			
$550,000-$650,000		15%	154
$650,001-$850,000		40%	412
$850,001-$1,050,000		30%	309
Above $1,050,000		15%	154
	Total	***100%***	***1,029***
Townhome			
$350,000-$450,000		20%	906
$450,001-$650,000		50%	2,266
$650,000+		30%	1,360
	Total	***100%***	***4,532***
Multifamily Rental			
$1,000-$1,500		5%	112
$1,501-$2,000		10%	224
$2,001-$2,750		45%	1,008
Above $2,750		40%	896
	Total	***100%***	***2,239***
Total Residential			**7,800**

Source: City Park

A.2 What number and percent of lots will be sold without constructed dwelling units? What is the extent of the improvements to on these lots prior to sale?

The City Park residential lots including single-family and townhomes will be sold with a built dwelling structure for the end user. The multifamily will be constructed by developer.

A.3 What will be the target market for the residential development (breakdown by number, percent and type of units to be marketed to retirees, families, etc. What portion will be marketed as second home/vacation homes?

There are no plans to specifically to market units specifically to an owner or tenant type. However, the development will primarily target primary homeowners and renters. The proposed units are expected to attract a broad segment of buyers and renters that comprise the housing market in south Miami Dade County, which include singles, young couples, families with children, and empty-nesters. There is no specific marketing to attract the retiree or second home/vacation home market.

B. Indicate and discuss the availability or projected availability of adequate housing and employment opportunities reasonably accessible to the development site. Housing opportunities should be described in terms of type, tenure, and cost range and location within the following circumscribed areas: adjacent, two miles, five miles, ten miles, and within the local jurisdiction or county. Employment opportunities should be described in terms of two digit SIC code numbers, located with the local jurisdiction with estimated distances or transit times to the development site.

In accordance with the approved methodology for City Park DRI, The Housing Demand, Supply and Need Methodology for Assessing the Affordable Housing Impact of Developments of Regional Impact (the "Methodology"), which was developed by the East Central Florida Regional Planning Council and amended in June 1999, was used as the basis for evaluating the adequacy of the affordable housing supply that will be available to people working the new development that will be undertaken in accordance with the City Park DRI. Importantly, and as set forth in the City Park Application for Development (Agreement to Delete), City Park DRI will estimate housing demand by calculating direct (on-site, permanent, non-construction employment by North American Industry Classification System [NAICS].

The methodology consists of four elements, which are as follows:

- Estimating the Demand for Affordable Housing
- Estimating the Supply of Affordable Housing
- Estimating the Need for Affordable Housing
- Mitigating the Deficit of Affordable Housing (if any)

Estimating Demand for Affordable Housing

The City Park DRI will establish entitlements for the following quantities of non-residential use:

Table 24-A.2
City Park DRI - Development Program

Residential		
Single Family (LD, 6)	1,029	homes
Townhome (MDR/MHDR, 18)	4,532	homes
Multifamily (HDR, 30+)	2,239	units
Total Residential	**7,800**	
Commercial/Retail		
Commercial	374,515	sq.ft.
TOD/Mixed Use	107,061	sq.ft.
Village Mixed Use	86,390	sq.ft.
Park Mixed Use	11,323	sq.ft.
Total Commercial/Retail	**579,289**	
Office		
Office	***500,000***	sq.ft.
Industrial		
Light Industrial	526,342	sq.ft.
Industrial Mixed Use	430,755	sq.ft.
Total Industrial	***957,097***	sq.ft.
Farm Mixed Use		
Farm Mixed Use	**105,251**	sq.ft.
Total Non-Residential	**2,141,637**	sq.ft.

Source: City Park

Based on the non-residential development program outlined above, there will be an estimated 7,844 total workers projected to be added to the workforce in the City Park community when the development authorized by the DRI is fully completed. Job creation within the proposed development is based upon employment-to-area ratio data (i.e., employee-per-square-foot for office and retail, employee-to-units for residential) obtained by nationally recognized land use and building operation resources used to establish the varying employment ratios discussed above including: Institute of Transportation Engineers (ITE), Urban Land Institute (ULI), National Apartment Association (NAA) and National Association of Industrial and Office Properties (NAIOP).

Retail: The retail space inclusive of shopper's goods and dining envisioned within the City Park development plan comprises a total of approximately 684,000 square feet. This includes a wide range of retail facilities including but not limited to

shopping center (including grocery anchored), ground floor retail within mixed use development, out parcels, and retail/entertainment venues. As set forth in Question 10, City Parks retail is primarily categorized as Neighbor Center, generally ranging in size for 30,000 (or less) to 125,000 square feet. At this point, there is no defined program for the amount of square footage that will be occupied by each type of retail use. However, some of the key metrics that are used to translate retail area to number of employees indicate traditional retail stores (ie. apparel, sports, jewelry) have 1 employee per 400 to 500 square feet of space, while restaurant (from fine dining to fast-casual/fast food) generally comprise 1 employee per 100 to 200 square feet. For this analysis, and based upon these metrics, the blended average among all retail use estimated for this analysis is one employee per 250± square feet; or, **2,724,** total retail employees.

Office: As it relates to office, it is universally known among industry representatives that there has been a steady decline in worker per square foot ratios within the past several years in large part driven by technology and the growth in shared-work space. Presently, office workers per square foot generally range between 170 to 225 square feet per employee, which can vary as it relates to net leasable vs. gross office area. For the 500,000 square foot of office development within City Park, the estimated worker ratio is 175± square feet per worker, with an additional 764 office workers within live/work office space of work-from-home space. This results in **3,621** total jobs.

Industrial: The 957,057 square feet industrial space will comprise a mix of light industrial (warehouse/distribution space) and mixed-use industrial that accounts for uses such as flex space which is exemplified by office showroom. Within these sectors, employees per square foot generally range from 750 to 1,000 square feet per employee. For this analysis, we utilize an average of approximately 850± square feet of space per employee; or, **1,141** jobs.

Education: The education component within City Park represents a school with a capacity of approximately 2,900 students. Inclusive of management, administrative, teachers, maintenance, and security, there will be an estimated 8 students per personnel, or **358** total jobs.

Residential: Management of City Park's residential (homeownership and rental) community includes positions such as management, administrative, sales/leasing, security, and common area maintenance. Multifamily rental buildings generally require 1 employee per 30 to 40 units depending on quality of product and amenities, while the single-family and townhome residences will require generally the same employment ratio. This results in more than 200 jobs; however, for this analysis, these are included within the uses noted above including the mixed-use components to avoid any double counting of jobs.

Based upon employment by use outlined above, there will be a total of **7,844 direct jobs** created by the City Park DRI upon build out (stabilized operations). Considering this, the next step of the analysis sets forth the process for establishing the level of affordable housing that may be needed for some of these new workers. There are two primary methodologies for estimating affordable housing needs among varying job sectors and summarized as: a.) *Bell Curve* – which distributes workers in each industry sector in the form of a bell curve in association with wage distribution; and b.) *Control Method* – which effectively adjusts the bell curve distribution so that the total estimated earnings of the workers in each industry sector approximates (within 3±%) the total wages that will be paid to the workers in that industry sector. The total wage amount is referred to as the "control number," which is computed by multiplying the average income of workers in an industry sector by the number of workers in that industry sector that will be employed within the proposed space.

As recognized within previous DRI applications within Miami Dade County during the past several years, including the most recent application submitted by the City of Miami/Miami DDA Increment III DRI, the *control method* is the preferred and more conservative method for assessing affordable housing needs particularly among more moderate wage industry sectors such as retail/food and beverage and for which the *bell curve* understates the number of jobs in these sectors that are within the very low and low income ranges.

Appendix 24-1 provides the detailed analysis of estimated workers by industry sector and wage categorization using the control method approach.

Table 24-B.1
Affordable Housing Demand
City Park DRI

	Very Low	Low	Moderate
Retail	319	562	308
Office	8	84	490
Industrial	17	80	180
Education	6	46	65
Total	**349**	**772**	**1,043**

Source: FDEO; US HUD; Lambert Advisory

As it relates to the distribution of workers by wage category as provided in the analyses above (and detailed in the Appendix), there are a few points to acknowledge:

- The analysis assumes that all jobs created in the City Park DRI will be full-time equivalent workers despite the fact that part-time employment is common in the retail, restaurant and hotel sectors.

- The analysis assumes that all workers will earn at least minimum wage, currently $13.00 per hour in Florida. A minimum wage worker would earn $27,040 annually if employed 40 hours per week, 52 weeks per year.

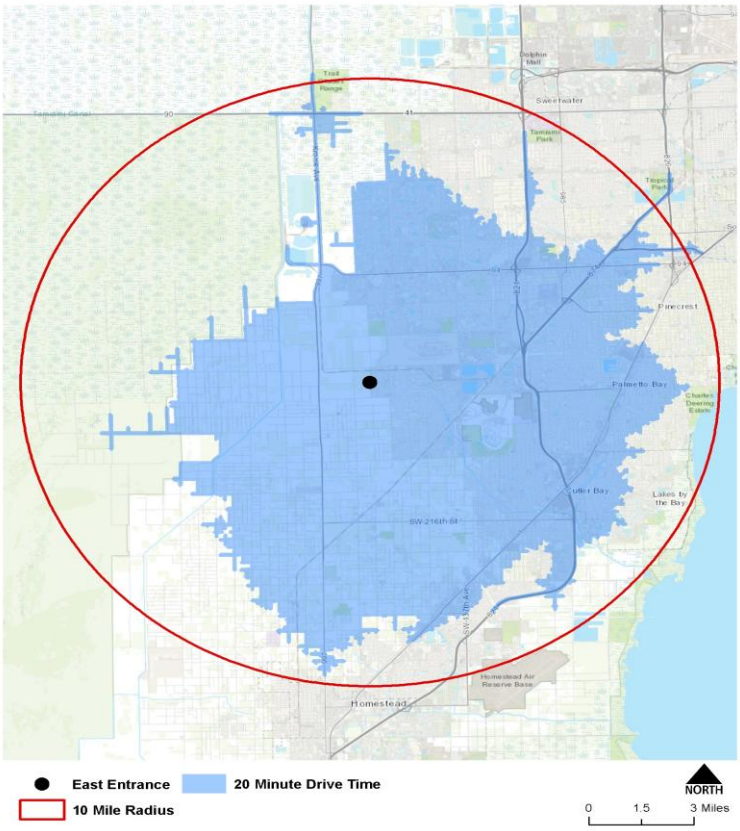
- The average wage and salary data by NAICS used in the analysis was compiled by the Florida Department of Economic Opportunity in its QCEW Report for the first quarter of Q4 2024. The analysis herein does not differentiate between full-time and part-time workers. It should be recognized that part-time workers understate the earnings of full-time workers and, particularly, for restaurant workers that receive wages in the form of gratuities.

Estimating Supply of Affordable Housing

The following is a summary of the steps taken to estimate the supply of affordable housing impacting the City Park DRI affordable housing analysis:

Housing Supply Geography

The Methodology requires that the relevant housing be "reasonably accessible" to the place of employment. Reasonably accessible is further defined in the methodology as a commute distance of no greater than 10 miles or a commute time of no more than 20 minutes at peak travel times, whichever is less. Figure 1 - 24-B. represents the area within a 20-minute drive time and ten-mile radius of the site.



The following table summarizes the income characteristics of very low-, low- and moderate-income households within Miami-Dade County based on the median income level reported for the County by the U.S. Department of Housing & Urban Development (HUD) and Florida Finance Housing Corporation (FHFC) as of April 1, 2025, which is $87,200.

Table 24 - B.2
HUD Define Housing Income Categories

Income Category	Definition	Income Threshold
Very Low Income	Up to 50% of AMI	Less than $43,600
Low Income	50% - 80% of AMI	$43,600 - $69,760
Moderate Income	80% - 120% AMI	$69,760 - $104,640

Source: USHUD

Affordable Housing Cost Threshold Amounts

In accordance with USHUD, housing is considered affordable when the total annual payments for rent or mortgage payments, taxes, insurance and utilities do not exceed 30 percent of the gross annual income. of very low-, low- and

moderate-income households. For homeownership, the expenditure threshold is 36 percent. Tables 24-B.3a and 24-B.3b illustrates the affordable housing threshold amounts by tenure for each of these income categories based on 36 percent household income expenditure for homeownership and 30 percent expenditure for rental.

Table 24-B.3a
Monthly Cost Threshold - Homeownership

	Annual Income		Monthly Income		Monthly Housing Exp.	
Very Low		$43,600		$3,633		$1,308
Low	$43,601	$69,760	$3,633	$5,813	$1,308	$2,093
Moderate	$69,761	$104,640	$5,814	$8,720	$2,093	$3,139

Table 24-B.3b
Monthly Cost Threshold - Rent

	Annual Income		Monthly Income		Monthly Housing Exp.	
Very Low		$43,600		$3,633		$1,090
Low	$43,601	$69,760	$3,633	$5,813	$1,090	$1,744
Moderate	$69,761	$104,640	$5,814	$8,720	$1,744	$2,616

Source: USHUD

Affordable Home Price Threshold Amounts

The process for collecting available for-sale housing is based upon actual current home sale transactions within the defined 20-minute drivetime geography, or gross "offering" price. In the case of for-sale housing, adjustments must be made for purchase financing terms (down payment, interest rate, and term of loan) as well as taxes, property insurance and mortgage insurance to derive affordability. Assumptions associated with each of these adjustments are derived from various market-based factors as follows:

Financing Payment (Mortgage Principal and Interest): The financing payment (also referred to as principal and interest (P&I) applied to the varying income thresholds outline above is based upon a 6.66 percent interest rate (Bankrate.com, July 12, 2025), 30-year term and 5 percent downpayment (noting, that the average mortgage downpayment for first time home buyers in the US is actually 9 percent according to Bankrate.com).

Real Estate (Ad Valorem) Tax: The computation of ad valorem tax is based upon the applicable Unincorporated Miami Dade County millage rates (16.9487) and a Homestead exemption $50,000, with the exception of the School districts which provide for a $25,000 exemption.

Property/Liability Insurance: The Florida Office of Insurance Regulation (FOIR) provides an insurance comparison tool referred to as CHOICES: Homeowners Rate Comparison Tool. The resource effectively displays comparative insurance rates among providers in Florida and, as a specific benchmark, provides insurance premiums for a newly constructed home in Miami Dade County valued at $300,000 (*Appendix 24-2*). There are 14 total providers and, to account for outliers, the two highest and lowest premiums have been removed, yielding a median annual insurance premium of $7,027; or, $23.32 per $1,000 in value. For the City Park homeownership, this metric is utilized against the housing value thresholds assuming insurance coverage at 80 percent of total home value – which effectively excludes land.

Mortgage Insurance: With a 5 percent downpayment, mortgage insurance is required. In accordance with data published by The Mortgage Report, as well as discussion with local mortgage brokers, mortgage insurance generally ranges from 0.5 to 1.3 percent of the home value. The analysis herein utilizes 0.85.

The following table summarizes the homeownership costs outlined above by income threshold cohort:

Table 24. B4
Estimated Homeownership Costs

Income Category	Mortgage P&I	Adv Tax	Property Ins.	Mortg. Ins.
Very Low	$864	$129	$221	$100
Low	$1,368	$234	$350	$159
Moderate	$2,131	$234	$545	$247

Sources: Bankrate.com; MDCPA; FOIR; The Mortgage Report

Deducting the homeownership costs from the homeownership income thresholds results in the maximum affordable amounts for each respective household income category – as follows:

Table 24. B5
Affordable Homeownership Threshold Values

	Monthly Cost Threshold		Housing Value	
Very Low		$1,308		**$141,000**
Low	$1,308	$2,093	**$141,001**	**$223,000**
Moderate	$2,093	$3,139	**$223,001**	**$347,500**

Affordable Home Price Threshold Amounts

Multifamily rental housing is ordinarily charged on a "net" basis, which excludes utilities. Accordingly, an adjustment to the affordable housing cost threshold is necessary to define the affordable monthly rent payment threshold for use in compiling the available inventory of affordable rental units. The utilities cost allowances used in the analysis, shown in Table 24.B-4 below are based on the information obtained for the Miami-Dade County Housing Department.

Table 24-B.6
Monthly Utility Allowance

Utility	Total Allowance
Efficiency	$159
1's	$174
2's	$222
3's	$276
Weighted. Avg.	**$200**

Source: Miami Dade County Housing Department

At this point in time, there is no defined multifamily rental program as it relates to unit mix within the proposed City Park multifamily development. However, in general conformity with regional unit typology, the analysis herein assumes: Efficiency - 5 percent; One-bedroom - 45 percent; two-bedroom – 45 percent; and, three-unit bedroom – 5 percent. As a result, the weighted average utility cost is $200. Reducing the rental income thresholds by the average utility allowance yields the “net” monthly rental rate by income cohort as follows:

Table 24. B7
Affordable "Net" Rent Threshold Values

	Net Monthly Cost Threshold	
Very Low		$890
Low	$891	$1,544
Moderate	$1,545	$2,416

Homeownership (For-Sale) and Rental Housing Supply

The supply of homeownership housing (affordable housing) is based upon housing sales within a 20-minute drivetime from City Park and recorded for the trailing 12-month period from July 1, 2024 to June 30, 2025 based upon the Miami Dade County Property Appraiser (MDCPA). Importantly, the analysis attempts to

eliminate transactions not deemed “arms-length” and namely property sales below $50,000 with the entire database included in *Appendix 24-3*. As summarized below, there were 7,105 total transactions in the trailing 12-month period with 1,387 homes sale transacting within the affordable housing categories summarized as follows:

TABLE 24 - B.8a
SUMMARY OF AFFORDABLE HOMEOWNERSHIP HOUSING SUPPLY

Total Sales 07/01/24-06/30/25:	7,105			
	Very Low	*Low*	*Moderate*	
	$141K	$141K-$223K	$223.1K-$347.5K	**Total**
# Sales below:	**197**	**283**	**907**	**1,387**

Source: MDCPA

However, an analysis of current “listings” from the Miami Realtors Multiple Listing (MLS) was also conducted for the drivetime geography. This clearly indicates significantly lower inventory of affordable homeownership currently on the market; though, some prospective transactions with listing above these thresholds may actually be lower than the listing price and fall into the affordable category. Nonetheless, the analysis (and detailed below) utilizes the listing availability for supply.

TABLE 24 - B.8b
MLS Listings - 20-minute Drivetime

Housing Type	**< $141K**	**$141K to $223K**	**$223K to $347.5K**
- Single-Family	0	0	0
- Townhouse	0	0	5
- Condo	0	14	160
Total	**0**	**14**	**165**

Source: Miami Realtors MLS

The supply of rental (affordable) housing is based upon a 20-minute drivetime from City Park utilizing Costar data that surveys an estimated 95+ percent of the rental product within the prescribed geography. The database includes vacant units by

unit type as well as effective rent (by unit type) reported by the specific rental property. Importantly, for this analysis, the availability of vacant affordable units only considers one- and two-bedroom units which is the predominate mix of multifamily housing within City Park. It is important to note that the 20-minute drivetime area comprises a total 30,000+ multifamily rental units, with nearly 7,000 units built since 2022. The market's current vacancy rate is 7.6 percent, or nearly 2,500 total units currently available. The database is included in the *Appendix 24-4* with a summary as follows:

Table 24 - B.9
SUMMARY OF AFFORDABLE RENTAL HOUSING SUPPLY

Total Vacant Rental Units:		1,347		
	Very Low	*Low*	*Moderate*	
	$890	$891-1,544	$1,545-$2,461	**Total**
# of vacant units:	3	43	1,301	**1,347**

Source: Costar

Based upon the inventory of affordable housing supply above, the Methodology accounts for net available units allowing for a 5 percent vacancy rate for rental units and 2.5% reduction for substandard housing for for-sale units.

TABLE 24 - B.10
NET AVAILABLE AFFORDABLE HOUSING UNITS

	Rental	For-sale	Total
Income Category			
Available Units			
Very Low	3	0	3
Low	43	14	57
Moderate	1,301	165	1,466
	(5% Vacancy	(2.5% Sub-	
Additions/Reductions	Rate)	Standard)	
Very Low	(0)	0	(0)
Low	(2)	(0)	(3)
Moderate	(65)	(4)	(69)
Net Available			
Very Low	3	0	3
Low	41	14	55
Moderate	1,236	161	1,397
TOTAL	**1,280**	**175**	**1,454**

As set forth above, this reduces the total available affordable units to 1,454. Based upon the estimate of affordable housing demand by income cohort for City Park, with an evaluation of corresponding affordable supply within the market, indicates a deficit of affordable housing for both very low- and low-income households, and a surplus of inventory for moderate-income households.

TABLE 24 - B.11
ESTIMATE SURPLUS/DEFICIT OF AFFORDABLE HOUSING

Income Category	Demand	Supply	Surplus/ Deficit
Very Low	350	3	(347)
Low	772	55	(718)
Moderate	1,043	1,397	354
Total	**2,165**	**1,454**	**(710)**

Lastly, the methodology specifies that any deficit is not considered significant if it exceeds 5 percent of the residential threshold for the DRI, or in this case 390 units (7,800 x 5.0%). As a result, the estimated deficit of affordable housing for City Park is 308 units.

TABLE 24 - B.12
Estimate of Surplus/Deficit of Affordable Housing w/5% Mitigation Allowance

Surplus/ Deficit	Total City Park Housing Units	City Park 5% Mitigation	Net Surplus/ Deficit
(710)	7,800	390	(320)

APPENDIX 24-1
EMPLOYEE WAGE DISTRIBUTION

Retail

Miami Dade County FHFC - Median Household Income: $87,200 2,724 Jobs

	Wage Ranges	Wage Ranges	Midpoint	No. of Employees	Total Wages	Head of Household	Single Worker	Income	Multi Worker	Income
Very Low Income	Minimum Wage	Maximum Wage	$28,600	381	$10,906,896	194	71	$28,600	123	$51,480
(less than $43,600)	$28,600	$31,599	$30,100	381	$11,478,745	194	71	$30,100	123	$54,179
	$31,600	$34,599	$33,100	272	$9,016,304	139	51	$33,100	88	$59,579
	$34,600	$37,599	$36,100	272	$9,833,504	139	51	$36,100	88	$64,979
	$37,600	$40,599	$39,100	218	$8,520,563	111	40	$39,100	70	$70,379
	$40,600	$43,600	$42,100	191	$8,027,628	97	35	$42,100	62	$75,780
Low Income	$43,601	$46,899	$45,250	163	$7,395,660	76	33	$45,250	43	$81,450
($43,601 - $69,760)	$46,900	$50,159	$48,530	109	$5,287,774	50	22	$48,530	28	$87,353
	$50,160	$53,419	$51,790	163	$8,464,476	76	33	$51,790	43	$93,221
	$53,420	$56,679	$55,050	73	$3,998,796	34	15	$55,050	19	$99,089
	$56,680	$59,939	$58,310	54	$3,176,702	25	11	$58,310	14	$104,957
	$59,940	$63,199	$61,570	48	$2,935,018	22	10	$61,570	12	$110,825
	$63,200	$66,459	$64,830	41	$2,648,933	19	8	$64,830	11	$116,693
	$66,460	$69,760	$68,110	38	$2,597,443	18	8	$68,110	10	$122,598
Moderate Income	$69,761	$73,299	$71,530	27	$1,948,477	11	5	$71,530	7	$128,754
($69,761 - $104,640)	$73,300	$76,429	$74,865	26	$1,937,344	11	5	$74,865	6	$134,756
	$76,430	$79,559	$77,995	26	$2,018,342	11	5	$77,995	6	$140,390
	$79,560	$82,689	$81,125	25	$1,988,848	10	4	$81,125	6	$146,024
	$82,690	$85,819	$84,255	22	$1,836,074	9	4	$84,255	5	$151,658
	$85,820	$88,949	$87,385	22	$1,904,283	9	4	$87,385	5	$157,292
	$88,950	$92,079	$90,515	22	$1,972,492	9	4	$90,515	5	$162,926
	$92,080	$95,209	$93,645	19	$1,785,613	8	3	$93,645	5	$168,560
	$95,210	$98,339	$96,775	19	$1,845,296	8	3	$96,775	5	$174,194
	$98,340	$101,469	$99,905	19	$1,904,979	8	3	$99,905	5	$179,828
	$101,470	$104,640	$103,055	14	$1,403,609	6	2	$103,055	3	$185,499
Middle Income	$104,641		$113,361	52	$5,894,746		2,645	2,724	79	
Total - Employees and Wages (City Park)				2,697	$120,728,545	$44,756				
Total - Employee and Wages (Base)				1,793	$87,288,978	$48,683	(see below)			

Headship Rates - Miami Dade County*			Single Work HH			Multi Worker HH		
Very Low	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*
50.9%	46.3%	42.2%	36.5%	43.8%	42.9%	63.5%	56.2%	57.1%

(*Source: ASC 2019-2023, PUMS)

Average Retail Wage (NAICS 44-45):	$50,320	0.8	2,158	$108,588,869
Accom., Food Service (NAICS 72):	$42,136	0.2	539	$22,732,018
	$48,683		2,697	$131,320,887

Additional Income - Multi Worker HH: 80.0%
(Source: Institute for Family Studies)

Office

Miami Dade County FHFC - Median Household Income: $87,200 3,542

	Wage Ranges	Wage Ranges	Midpoint	No. of Employees	Total Wages	Head of Household	Single Worker	Income	Multi Worker	Income
Very Low Income	Minimum Wage	Maximum Wage	$28,600	6	$182,342	3	1	$28,600	2	$51,480
(less than $43,600)	$28,600	$28,600	$28,600	6	$182,342	3	1	$28,600	2	$51,480
	$28,601	$28,601	$28,601	6	$182,349	3	1	$28,601	2	$51,482
	$28,602	$28,602	$28,602	6	$182,355	3	1	$28,602	2	$51,484
	$28,603	$28,603	$28,603	7	$202,624	4	1	$28,603	2	$51,485
	$28,604	$43,600	$36,102	11	$383,620	5	2	$36,102	3	$64,984
Low Income	$43,601	$46,899	$45,250	18	$801,378	8	4	$45,250	5	$81,450
($43,601 - $69,760)	$46,900	$46,900	$46,900	23	$1,079,779	11	5	$46,900	6	$84,420
	$46,901	$46,901	$46,901	28	$1,328,987	13	6	$46,901	7	$84,422
	$46,902	$46,902	$46,902	35	$1,661,269	16	7	$46,902	9	$84,424
	$46,903	$46,903	$46,903	71	$3,322,609	33	14	$46,903	18	$84,425
	$46,904	$46,904	$46,904	35	$1,661,340	16	7	$46,904	9	$84,427
	$46,905	$46,905	$46,905	53	$2,492,063	25	11	$46,905	14	$84,429
	$46,906	$69,760	$58,333	71	$4,132,310	33	14	$58,333	18	$104,999
Moderate Income	$69,761	$73,299	$71,530	106	$7,600,778	45	19	$71,530	26	$128,754
($69,761 - $104,640)	$73,300	$73,300	$73,300	142	$10,385,144	60	26	$73,300	34	$131,940
	$73,301	$73,301	$73,301	142	$10,385,286	60	26	$73,301	34	$131,942
	$73,302	$73,302	$73,302	177	$12,981,784	75	32	$73,302	43	$131,944
	$73,303	$73,303	$73,303	213	$15,578,354	90	38	$73,303	51	$131,945
	$73,304	$73,304	$73,304	248	$18,174,994	105	45	$73,304	60	$131,947
	$73,305	$73,305	$73,305	248	$18,175,242	105	45	$73,305	60	$131,949
	$73,306	$73,306	$73,306	248	$18,175,490	105	45	$73,306	60	$131,951
	$73,307	$73,307	$73,307	248	$18,175,738	105	45	$73,307	60	$131,953
	$73,308	$73,308	$73,308	248	$18,175,986	105	45	$73,308	60	$131,954
	$73,309	$104,640	$88,975	248	$22,060,338	105	45	$88,975	60	$160,154
Middle Income	$104,641		$113,361	703	$79,692,432		2,645	2775	130	
Total - Employees and Wages (City Park)				3,348	$267,356,926	$79,860				
Total - Employee and Wages (Base)				3,348	$389,618,291	$116,380				

Headship Rates - Miami Dade County*			Single Work HH			Multi Worker HH		
Very Low	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*
50.9%	46.3%	42.2%	36.5%	43.8%	42.9%	63.5%	56.2%	57.1%

(*Source: ASC 2019-2023, PUMS)

Avg. Professional, Bus. Services Wage (NAICS 1024): $116,380

Additional Income - Multi Worker HH: 80.0%
(Source: Institute for Family Studies)

Industrial

Miami Dade County FHFC - Median Household Income: $87,200 1,141 Jobs

	Wage Ranges	Wage Ranges	Midpoint	No. of Employees	Total Wages	Head of Household	Single Worker	Income	Multi Worker	Income
Very Low Income	Minimum Wage	Maximum Wage	$28,600	11	$326,326	6	2	$28,600	4	$51,480
(less than $43,600)	$28,600	$28,600	$28,600	11	$326,326	6	2	$28,600	4	$51,480
	$28,601	$28,601	$28,601	14	$407,922	7	3	$28,601	5	$51,482
	$28,602	$28,602	$28,602	14	$391,619	7	3	$28,602	4	$51,484
	$28,603	$28,603	$28,603	17	$489,540	9	3	$28,603	6	$51,485
	$28,604	$43,600	$36,102	23	$823,848	12	4	$36,102	7	$64,984
Low Income	$43,601	$46,899	$45,250	23	$1,032,605	11	5	$45,250	6	$81,450
($43,601 - $69,760)	$46,900	$46,900	$46,900	23	$1,070,258	11	5	$46,900	6	$84,420
	$46,901	$46,901	$46,901	29	$1,337,851	13	6	$46,901	7	$84,422
	$46,902	$46,902	$46,902	34	$1,605,455	16	7	$46,902	9	$84,424
	$46,903	$46,903	$46,903	34	$1,605,490	16	7	$46,903	9	$84,425
	$46,904	$46,904	$46,904	34	$1,605,524	16	7	$46,904	9	$84,427
	$46,905	$46,905	$46,905	34	$1,605,558	16	7	$46,905	9	$84,429
	$46,906	$69,760	$58,333	40	$2,329,528	18	8	$58,333	10	$104,999
Moderate Income	$69,761	$73,299	$71,530	40	$2,856,551	17	7	$71,530	10	$128,754
($69,761 - $104,640)	$73,300	$73,300	$73,300	46	$3,345,412	19	8	$73,300	11	$131,940
	$73,301	$73,301	$73,301	57	$4,181,822	24	10	$73,301	14	$131,942
	$73,302	$73,302	$73,302	57	$4,181,879	24	10	$73,302	14	$131,944
	$73,303	$73,303	$73,303	57	$4,181,936	24	10	$73,303	14	$131,945
	$73,304	$73,304	$73,304	57	$4,181,993	24	10	$73,304	14	$131,947
	$73,305	$73,305	$73,305	68	$5,018,460	29	12	$73,305	16	$131,949
	$73,306	$73,306	$73,306	68	$5,018,529	29	12	$73,306	16	$131,951
	$73,307	$73,307	$73,307	80	$5,855,030	34	14	$73,307	19	$131,953
	$73,308	$73,308	$73,308	80	$5,855,110	34	14	$73,308	19	$131,954
	$73,309	$104,640	$88,975	80	$7,106,393	34	14	$88,975	19	$160,154
Middle Income	$104,641		$113,361	107	$12,129,574					
Total - Employees and Wages (City Park)				1139	$78,870,539	$69,243				
Total - Employee and Wages (Base)				1139	$89,067,942	$78,196				

Headship Rates - Miami Dade County*			Single Work HH			Multi Worker HH		
Very Low	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*
50.9%	46.3%	42.2%	36.5%	43.8%	42.9%	63.5%	56.2%	57.1%

(*Source: ASC 2019-2023, PUMS)

Avg. Transport., Warehousing Wage (NAICS 48-49): $78,196

Additional Income - Multi Worker HH: 80.0%
(Source: Institute for Family Studies)

Education

Miami Dade County FHFC - Median Household Income: $87,200 358 Jobs

	Wage Ranges	Wage Ranges	Midpoint	No. of Employees	Total Wages	Head of Household	Single Worker	Income	Multi Worker	Income
Very Low Income	Minimum Wage	Maximum Wage	$28,600	1	$25,597	0	0	$28,600	0	$51,480
(less than $43,600)	$28,600	$28,600	$28,600	1	$25,597	0	0	$28,600	0	$51,480
	$28,601	$28,601	$28,601	2	$46,076	1	0	$28,601	1	$51,482
	$28,602	$28,602	$28,602	7	$204,790	4	1	$28,602	2	$51,484
	$28,603	$28,603	$28,603	9	$255,997	5	2	$28,603	3	$51,485
	$28,604	$43,600	$36,102	11	$387,735	5	2	$36,102	3	$64,984
Low Income	$43,601	$46,899	$45,250	14	$647,980	7	3	$45,250	4	$81,450
($43,601 - $69,760)	$46,900	$46,900	$46,900	16	$772,349	8	3	$46,900	4	$84,420
	$46,901	$46,901	$46,901	18	$839,528	8	4	$46,901	5	$84,422
	$46,902	$46,902	$46,902	21	$1,007,455	10	4	$46,902	6	$84,424
	$46,903	$46,903	$46,903	25	$1,175,389	12	5	$46,903	7	$84,425
	$46,904	$46,904	$46,904	25	$1,175,414	12	5	$46,904	7	$84,427
	$46,905	$46,905	$46,905	29	$1,343,359	13	6	$46,905	7	$84,429
	$46,906	$69,760	$58,333	29	$1,670,657	13	6	$58,333	7	$104,999
Moderate Income	$69,761	$73,299	$71,530	21	$1,536,464	9	4	$71,530	5	$128,754
($69,761 - $104,640)	$73,300	$73,300	$73,300	18	$1,312,070	8	3	$73,300	4	$131,940
	$73,301	$73,301	$73,301	20	$1,443,297	8	4	$73,301	5	$131,942
	$73,302	$73,302	$73,302	17	$1,233,379	7	3	$73,302	4	$131,944
	$73,303	$73,303	$73,303	14	$1,049,699	6	3	$73,303	3	$131,945
	$73,304	$73,304	$73,304	11	$787,285	5	2	$73,304	3	$131,947
	$73,305	$73,305	$73,305	11	$787,296	5	2	$73,305	3	$131,949
	$73,306	$73,306	$73,306	11	$787,306	5	2	$73,306	3	$131,951
	$73,307	$73,307	$73,307	11	$787,317	5	2	$73,307	3	$131,953
	$73,308	$73,308	$73,308	7	$524,885	3	1	$73,308	2	$131,954
	$73,309	$104,640	$88,975	7	$637,057	3	1	$88,975	2	$160,154
Middle Income	$104,641		$113,361	6	$680,163					
Total - Employees and Wages (City Park)				361	$21,144,144	$58,520				
Total - Employee and Wages (Base)				361	$21,404,301	$59,240				

Headship Rates - Miami Dade County*			Single Work HH			Multi Worker HH		
Very Low	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*	*Very Low*	*Low*	*Moderate*
50.9%	46.3%	42.2%	36.5%	43.8%	42.9%	63.5%	56.2%	57.1%

(*Source: ASC 2019-2023, PUMS)

Avg. Education Services Wage (NAICS 48-49): $59,240

Additional Income - Multi Worker HH: 80.0%
(Source: Institute for Family Studies)

APPENDIX 24-2

CHOICES: Homeowners Rate Comparison Tool

CHOICES Main Website

Miami-Dade County

$300,000 Value - New Construction

This risk is for a Florida masonry home built in 2005, with a current replacement value of $300,000, a $500 non-hurricane deductible, a 2% hurricane deductible, no claims in the past three years, and minimum premium discounts for limited wind mitigation features and no hip roof.

#	Company Name	Rate
1	FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY	$4,344
2	CASTLE KEY INDEMNITY COMPANY	$4,575
3	STILLWATER PROPERTY AND CASUALTY INSURANCE COMPANY	$4,716
4	STATE FARM FLORIDA INSURANCE COMPANY	$5,892
5	TOWER HILL PRIME INSURANCE COMPANY	$6,353
6	FIRST PROTECTIVE INSURANCE COMPANY	$7,702
7	LIBERTY MUTUAL FIRE INSURANCE COMPANY	$7,776
8	UNIVERSAL PROPERTY & CASUALTY INSURANCE COMPANY	$8,314
9	CITIZENS PROPERTY INSURANCE CORPORATION	$9,754
10	SECURITY FIRST INSURANCE COMPANY	$12,366
11	ASI PREFERRED INSURANCE CORP.	$12,479
12	PEOPLE'S TRUST INSURANCE COMPANY	$15,229
13	AUTO CLUB INSURANCE COMPANY OF FLORIDA	$16,435
14	SOUTHERN OAK INSURANCE COMPANY	$16,852

To learn more about wind mitigation features, see Form OIR-B1-1655

APPENDIX 24-3
20-MINUTE DRIVE TIME HOMEOWNERSHIP SALE & LISTINGS

Count of Cohort	Column Labels		
	2024	2025	Grand Total
Sales Per Use Per Cohort			
RESIDENTIAL - SINGLE FAMILY : 1 UNIT	**137**	**69**	**206**
<=$141,000	58	23	81
$141,001-$223,000	30	19	49
$223,000-$347,500	49	27	76
RESIDENTIAL - SINGLE FAMILY : ADDITIONAL LIVING QUARTERS	**1**	**1**	**2**
<=$141,000	1	1	2
RESIDENTIAL - SINGLE FAMILY : CLUSTER HOME	**26**	**15**	**41**
<=$141,000	6	8	14
$141,001-$223,000	10	4	14
$223,000-$347,500	10	3	13
RESIDENTIAL - SINGLE FAMILY : RESIDENTIAL - TOTAL VALUE	**23**	**10**	**33**
<=$141,000	11	6	17
$141,001-$223,000	5	2	7
$223,000-$347,500	7	2	9
RESIDENTIAL - SINGLE FAMILY : RESIDENTIAL W/ ADDITIONAL QUARTERS	**3**		**3**
<=$141,000	2		2
$141,001-$223,000	1		1
RESIDENTIAL - TOTAL VALUE : CONDOMINIUM - RESIDENTIAL	**698**	**308**	**1006**
<=$141,000	34	20	54
$141,001-$223,000	118	74	192
$223,000-$347,500	546	214	760
RESIDENTIAL - TOTAL VALUE : TOWNHOUSE	**54**	**41**	**95**
<=$141,000	13	13	26
$141,001-$223,000	13	7	20
$223,000-$347,500	28	21	49
RESIDENTIAL - TOTAL VALUE : TOWNHOUSE W/ ADDITIONAL LIVING QUARTERS		**1**	**1**
<=$141,000		1	1
Grand Total	**942**	**445**	**1387**

APPENDIX 24-4
20-MINUTE DRIVE TIME RENTAL AVAILABILITY SUPPLY

Property Name	Property Address	Year Built	Number Of Units	Studio Vacant Units	Studio Effective Rent/Unit	One Bedroom Vacant Units	One Bedroom Effective Rent/Unit	Two Bedroom Vacant Units	Two Bedroom Effective Rent/Unit	Three Bedroom Vacant Units	Three Bedroom Effective Rent/Unit
Modern Towers	25850 SW 140th Ct	2024	660			89	1,916	179	2,336	33	2,862
Madison Point Apartments	26215 S Dixie Hwy	2023	263			0	1,176	0	1,401	0	1,620
	24705 SW 129th Ave	2023	15							0	
Azalea Grove at Naranja	26201 SW 138th Ct	2023	32								
	10510 SW 182nd St	1994	2					0			
	10520 SW 182nd St	1994	2					0			
	10532 SW 182nd St	1994									
	10544 SW 182nd St	1994									
	10606 SW 182nd St	1994									
	10622 SW 182nd St	1994									
	10634 SW 182nd St	1994									
Cannery Row at Redlands Cross	14380 SW 261St St	2022	112			0	1,116	0	1,344		
	10531 SW 184th St	1961	2			0					
	10541 SW 184th St	1961	2			0					
	10601 SW 184th St	1961	2			0					
Max's Landing Apartments	8905 SW 169th Ct	2021	76			0	612	0	740		
Bay Pointe	18412 Homestead Ave	2024	269			25	2,065	31	2,469	11	3,210
The Groves at Sunset	8818 SW 72nd St	1969	200			1	1,726	2	2,017		
Sunset Way	15385-15391 SW 73rd Terra	1985	287	5	1,270	21	1,591	2	1,979		
Legacy Lakeside	15410 SW 75th Circle Ln	1985	224			0	1,895	0	2,219	0	2,428
Kendall Oaks Apartments	10805 SW 86th St	1997	29			0		1			
	14130-14140 SW 88th Ave	1958	6								
	14150-14160 SW 88th Ave	1959	6								
	14200-14210 SW 88th Ave	1958	6								
	14250-14260 SW 88th Ave	1963	6								
	14300 SW 88th Ave	1963	6								
	14320 SW 88th Ave	1958	6								
Legacy at the Palms	10771-10791 SW 88th St	1968	100			0	1,970	0	2,349		
Sherwood West	11111 SW 88th St	1970	184			4	1,823	4	2,163	0	1,876
Residences at the Falls	13841 SW 90th Ave	1972	480			12	1,912	9	2,302	3	2,618
Shamrock Kendall	12605-12645 SW 91st St	1995	49					2			
	15785 SW 92nd Ave	2000	12							0	
Altis at Kendall Square	16950 SW 93rd St	2014	321	1	1,585	5	2,038	7	2,481	1	2,968
	9150 SW 95th Ave	1970	4			0					
Palmetto Golf Club Apartments	15900 SW 95th Ave	1968	81			0	1,648	0	1,932		
Country Club South	15957 SW 95th Ave	1967	86	1	1,078	1	1,216	0	1,336	0	1,606
The Oasis At Coral Reef	15005-15060 SW 97 Ave	2023	201	9	4,553	16	5,332	17	5,942		
Kendall Manor Apartments	8707-8711 SW 97th Ave	1968	76					0			
Cherry Grove Village Apartmen	9000 SW 97th Ave	1969	177					0	2,634	0	3,231
Palmetto Station	17945 SW 97th Ave	2019	271			3	2,217	3	2,820	1	3,933
The Addison at Palmetto Bay	18185 SW 98th Ave	2025	83					11	3,176	31	3,491
Vistas Palmetto Bay	18300 SW 98th Ave	2023	60			1	2,421	2	2,789	0	3,725
	17100 SW 100th Ave	2006	4			0					
	17120 SW 100th Ave	1957	4			0					
Coral Bay Plaza	21850 SW 103rd Ct	1994	40			0	1,055	0	1,055		
Cutler Riverside	21630 SW 104th Ct	1989	200			1	1,287	3	1,525	1	1,744
Cortland at the Hammocks	15280 SW 104th St	1986	720			31	2,016	13	2,488	3	3,148
Sunset Gardens Apartments	7400 SW 107th Ave	1996	208			0	2,356	5	2,645	0	2,822
Four Quarters Habitat Apartme	8337 SW 107th Ave	1976	336			0	1,617	0	1,868	0	1,861
The Oaks	8440 SW 107th Ave	1969	50	0	1,397	0	1,320	0	1,761		
Treetop Apartments	8532 SW 107th Ave	1974	263			5	1,746	3	2,136		
Captiva Club	17692 SW 107th Ave	2003	136			0	1,303	0	1,551	0	1,781
South Pointe	17800 SW 107th Ave	1971	170			0	950	0	1,088	0	1,137
Centerra	18000 SW 107th Ave	2019	104					0	1,400	0	1,601
Solina Old Cutler	22555 SW 107th Ave	2023	390			12	1,998	2	2,169	5	2,817
Hardin Hammocks Estates	22555 SW 107th Pl	1997	200							0	1,032
Timbercreek Apartments	11098 SW 107th St	1981	29					0	2,107		
Sunpointe Apartments	11180-11190 SW 107th St	1987	87			0	1,483	0	1,547		
Adrian Builder at Eureka	18355 SW 110th Ave	2024	58			8	1,914	19	2,369		
Timbercreek	19600 SW 110th Ct	1981	28					0			
Cabana Club Apartments	19701 SW 110th Ct	1969	332	0	1,019	3	1,324	0	1,452		
Caribbean Village	19755 SW 110th Ct	2019	123			1	1,112	0	1,326		
Courtyards at Cutler Bay	19800 SW 110th Ct	1966	144			0	1,226	0	1,507		
Cutlerwood Apartments	20001 SW 110th Ct	1963	161	0	705	0	820	0	957		
Federation Gardens	10905-10911 SW 112th Ave	1982	161	0	1,307	0	1,991				
BCC Apartments	21160 SW 112th Ave	1971	103			0	890	0	1,087	0	1,502
Garden Walk Apartments	21354 SW 112th Ave	1995	228			0	849	0	1,012	0	1,153
Coquina Place Apartments	21451 SW 113th Ave	2016	96			0	1,138	0	1,348	0	1,546
	22300 Sw 115th Ct	1960	10			0		0			
	22385 SW 115th Ct	2020	2							0	
	22300 SW 116th Ave	1966	4					0			
Richmond Manor	14501 SW 117th Ave	1958	6					2	1,263		
	22201-22335 SW 117th Ave	1968	12					0		0	
	22300 SW 117th Ave	1956	4			0	728	0	910		

4 Unit Apartment	22310 SW 117th Ave	1956	4			0	649	0	843		
Karis Village	21517 SW 119th Ave	2018	88								
Waterford Point	8960 SW 122nd Ave	1989	244	4	1,751	18	2,089	17	2,615		
Vista Verde at Deerwood	13901 SW 122nd Ave	1999	256			0	1,794	0	2,172	0	2,470
Running Brook	20505 SW 122nd Ave	2002	186					0	1,459	0	1,677
The Stratford	9051 SW 122th Ave	1992	244			4	2,260	4	2,649	2	3,083
Southern Anchor Apartments	15300 SW 123 Ave	1967	72							0	2,385
Marcia Gardens	10301 SW 127th Ave	2018	134			2	1,329				
Hidden Lake	12950 SW 127th Ave	2022	133			2	2,307	2	2,733	0	3,886
Cortland South Kendall	15520 SW 127th Ave	2019	600	0	2,034	8	2,316	17	2,669	2	3,242
Princeton Landings	24350 SW 127th Pl	2024	334			6	1,644	83	2,037	29	2,646
	24600 SW 129th Ave	2022	13					0			
Princeton Grove	25001 SW 130th Ave	2016	216			1	1,693	8	1,815	3	2,349
	24940 SW 134th Ave	2023	10					0			
Sunshine Villas	25101 SW 134th Ave	2022	71					0	2,066	0	2,449
Southern Villas Townhomes	25240 SW 134th Pl	2020	100					2	2,281	1	2,598
Pinnacle at Tropical Pointe	25155 SW 136 Ave	2024	215			0	1,205	0	1,450	0	1,680
Azura	12755 SW 136th St	2016	240			4	2,223	4	2,691	1	3,137
Amelia Apartments	15350 SW 136th St	2021	264			2	1,971	4	2,315	1	2,841
Pepper Cove	9300 SW 137th Ave	1987	208			12	1,985	7	2,448		
Altis Grand Kendall	9455 SW 137th Ave	2024	342			45	2,138	62	2,624	2	3,176
The Park at Kendall	16480 SW 137th Ave	2014	296			13	2,089	13	2,632	7	3,045
Atlantico at Kendall I	16824 SW 137th Ave	2015	322			6	2,171	8	2,554	2	2,904
Tuscany Place	25400 SW 137th Ave	2004	340			2	1,303	2	1,545	2	1,775
	26201 SW 138 Ct	2022	32								
Kendall Royale Apartments	6501 SW 139th Ct	1985	30			0		1		0	
	15263 SW 141st St	1998	4								
	13466 SW 142nd	2002	8								
Cortland Kings Meadow	8961 SW 142nd Ave	1985	480			20	2,097	15	2,522	2	3,046
Waterford Landing	9052 SW 142nd Ave	1987	362	6	1,425	24	1,585	6	2,073		
Palmetto Place Apartments	9601 SW 142nd Ave	1986	416			7	1,785	8	2,199		
La Joya Apartments	26760 SW 142nd Ave	2014	150			0	1,192	0	1,375	0	1,541
The Preserve at Coral Town Par	26484 SW 142nd St	2019	90			1	1,701	2	1,886		
Magnolia Landing Apartment	25881 SW 143 Ct	2012	150			0	1,110	0	1,345	0	1,563
Green Turtle Club	13770 SW 143rd St	2015	248					2	2,671		
Woodside Oaks Apartments	26205 SW 144 Ave	2011	103			0	1,192	1	1,411	0	1,615
Circle Creek Apartments	26005 SW 144th Ave	2013	100					0	1,403	0	1,604
Gardens Apartments	8700 SW 145th St	1958	32			1		0			
	26800 SW 145th Avenue Rd	1956	28			0					
Lanai Landings	26511 SW 146th Ct	2020	54			0	1,612	1	1,777		
Sunrise Commons	26600 SW 146th Ct	2009	106			0	1,091	0	839	0	974
Tennis Villas Apartments	9175 SW 147th Ave	1976	200			7	1,592				
Orchid Estates	26400 SW 147th Ave	2017	74			0	1,072	0	1,233	0	1,358
Emerald Palms	12325 SW 151st St	1985	505			9	2,089	14	2,587	2	3,286
Oasis Apartments	7480 SW 152nd Ave	1990	47					0	1,413		
Lakeside Towers	7555 SW 152nd Ave	1988	384			0	1,933	0	2,304	0	2,661
Sunset on the Lakes	7805-7815 SW 152nd Ave	1989	60	2	828	2	1,028				
Village at Coral Reef	9761 SW 152nd St	2020	174			5	2,041	10	2,432		
Park Lake Apartments	8201 SW 152nd Avenue Cir	1987	82	0	1,496	0	1,603	0	1,922		
	7565 SW 153rd Ct	1985	2					0			
	17500 SW 153rd Path	2014	2			0				0	
	23100 SW 154 Ave	1927	5			0					
Vista Lago at the Hammocks	10571 SW 156th Pl	1988	136			6	1,903	5	2,446		
Royal Coast Apartments	9001 SW 156th St	1969	174			1	1,092	1	1,287		
Alexan Kendall	9030 SW 158th Ave	2024	576			167	2,242	171	2,790	28	3,354
	26805 SW 162 Ave	2004	1								
Miami Everglades	20675 SW 162nd Ave	1970	303								
	9371 SW 169th St	1975	2					0			
	13718 SW 171st Ln	2004	1							0	
Casa Vera	8881 SW 172nd Ave	2016	546			13	2,133	12	2,457	5	3,152
	10680 SW 172nd St	1950	8			0					
Perrine Rainbow	10000 SW 173rd Ter	1979	64					0	1,422	0	1,649
Indigo Palmetto Bay	9420-9500 SW 174th St	2022	235	2	2,132	8	2,325	7	2,891	2	3,452
	10222 SW 174th Ter	2018	3			0	1,113			0	2,004
	10214 SW 175th St	2018	3			0	1,113			0	2,004
	10280 SW 175th St	1993	3			0					
	10260 SW 181st St	2005	4					0			
	10270 SW 181st St	2005	4					0			
	9785 SW 181st Ter	1987	18								
	10261 SW 182nd St	2004	4					0			
	10271 SW 182nd St	2004	4					0			
	9720-9730 SW 184th St	2004	22			0					
Paradise Isles Apartments	11020 SW 196th St	1973	199	0	1,253	0	1,805	0	2,106	0	2,352
Cutler Meadows Glen Apartmei	11100 SW 196th St	1982	225			0	1,368	0	1,444		
Cutler Glen and Cutler Meadow	11240-11280 SW 196th St	1981	225			3	946	1	1,083		
Casa Devon Apartments	11250 SW 197th St	1981	210			0	1,651				
Cutler Gardens Apartments	10820 Sw 200th Dr	1974	440	0	1,283	0	1,848	0	2,100		
Carib Villas Apartments	11105 SW 200th St	1966	365	1	1,275	1	1,440	4	1,748	1	1,936

Caribbean West Apartments	12140 SW 200th St	1973	102			0	767	0	912	0	1,044
Cutler Bay Centre	11150 SW 211th St	2014	101			0	1,506	0	1,857		
Cutler Bay Apartments	10300 SW 212th St	1997	100			1	1,097				
Cutler Hammock	10376 SW 212th St	1992	262			3	965	3	1,410	2	1,612
	11955 SW 213th St	1965	68					2	554		
	12101 SW 213th Ter	1958	6			0					
Water's Edge Apartments	10940-10999 SW 214th St	2021	128			0	1,510	0	1,785	0	2,063
	12029 SW 215th St	1958	4					0			
Hainlin Mills	10400 SW 216th St	1995	144			0	1,193	0	1,413	1	1,616
Cutler Vista	10471 SW 216th St	1990	216			0	853	0	1,231	0	1,398
Bel Aire Apartments	10509-10539 SW 216th St	1985	124	2	1,452	11	1,705	1	1,975		
Cutler Manor Apartments	10875 SW 216th St	1971	220			0	1,462	0	1,613	0	1,815
Arthur Mays Villas	11341 SW 216th St	1974	184					1		1	
Meridian Point at Goulds Statio	11850 SW 216th St	2024	113			1	1,636	1	1,966	3	2,002
Silver Creek Apartments	11855 SW 216th St	2020	90			0	1,253	0	1,156		
Goulds Apartments	11255 SW 220th Ter	1980	48					0	1,038	0	1,157
Sunset Bay	10000 SW 224th St	2001	308			1	1,210	2	1,464	1	1,691
	11101 SW 224th St	1962	3							0	
	11625 SW 224th St	1965	28			1	924				
Windmill Farms	12871 SW 242nd St	2024	274			0	1,200	0	1,429	0	1,638
Casa Princeton	12835 SW 246th Ter	2024	62			1	1,689	1	2,183	0	3,145
Princeton Park	13113 SW 248th St	2018	150			0	1,318	0	1,581	0	1,807
Mirabella	12801 SW 252nd St	2011	204			0	1,306	0	1,552	0	1,783
Sophia Square	13710 SW 256th St	2019	281			3	1,754	11	1,928	1	2,208
Keys Crossing	14311 SW 258th Ln	2017	100					1	1,400	1	1,601
Casa Matias	14340 SW 260th St	2012	80			0	546	0	656	0	758
The Avenue at Naranja	13735 SW 262nd St	2022	231			5	1,735	14	2,032	1	2,370
Naranja Villas	14003 SW 263rd Ter	1997	90			0	925	0	1,062	0	1,188
Redland Crossing	14770 SW 264th St	2020	134					0	1,235	0	1,360
La Joya Estates	14261 SW 267th St	2018	106			0	1,123	0	1,298	0	1,436
The Landings At Coral Town Par	14361 SW 268th St	2015	162			1	1,671	0	1,905	0	2,195
The Heights at Coral Town Park	14401 SW 268th St	2018	180			3	1,736	3	1,901	2	2,246
Ambar Trail	15000 SW 272th St	2023	342			0	1,109	0	1,328	0	1,536
Richmond Pine	14700 Booker T Washington	1995	80			0	869	1	1,035		
Sol Vista	11251 Caribbean Blvd	2024	227			0	1,315				
Perrine Gardens	10161 Circle Plz W	1975	158	0		0		0		1	
Bay Village One	18301 S Dixie Hwy	2020	213	1	1,925	3	2,138	3	2,313	0	3,254
Pine Groves	24101 S Dixie Hwy	2020	204			7	1,604	7	1,973		
Coral Bay Cove	25801 S Dixie Hwy	2019	224					0	1,401	0	1,602
Vista Sur	27077 S Dixie Hwy	2024	226			36	1,917	34	2,262		
Residences at Naranja Lakes	27550 S Dixie Hwy	2024	140			0	1,277	0	1,477	0	1,670
Bridges at Kendall Place	8485 Hammocks Blvd	2013	228			5	2,037	9	2,589	2	3,248
Cascades at the Hammocks	10605-10651 Hammocks Blv	1988	264			3	2,238	5	2,487	2	3,107
Tucker Tower	9940 Hibiscus St	2024	120			0	1,153	0	1,374		
	17325 Homestead Ave	1955	6			0					
	18200 Homestead Ave	1954	3			0					
Quail Roost Station	18505 Homestead Ave	2025	350	35	1,665						
	10030 W Indigo St	1955	9								
	10129 W Jessamine St	2019	3			0	1,113			0	2,004
North Hill Apartments	9828 N Kendall Dr	1969	56			0		0			
Legacy Nob Hill	9856 N Kendall Dr	1969	314			0	1,880	0	2,259	0	2,229
Wellington Manor Apartments	10805 N Kendall Dr	1968	205			2	1,650	0	2,114	0	2,500
Legacy Harbour Key	11033 N Kendall Dr	1969	300			0	1,791	1	2,163	0	2,436
	11432 Lincoln Blvd	1958	2			0					
	14550 Mable St	1964	12					0			
Old Cutler Village	10415 Old Cutler Rd	2003	288			0	1,210	1	1,460	0	1,694
	21845 Old Dixie Hwy	1963	4					0			
	14680 Pierce St	1970	1								
John & Anita Ferguson Residen	11003 Pinkston Dr	2016	79			0	1,226	0	1,454		
St. Anne's Gardens	11800 Quail Roost Dr	2003	96			1	675	0	866		
Affina	15705 Southwest 127th Ave	2025	352			138	2,076	144	2,786	52	3,477
Palace Suites	11377 SW 84th St	1999	180	7	6,160	7	6,955	7	8,296		
	16930 SW 93rd Ave	1963	2			0					
	16955 SW 100th Ave	2024	10			0		1		0	
Amaretto	11847 SW 102nd St	1987	1							0	
	18145 SW 105th Ave	1948	4					0			
	18350 SW 105th Ave	1961	2			0					
	21455 SW 112th Ave	2021	48					1			
	22210 SW 116th Ave	1962	4			0					
	19810 SW 117th Ave	1971	6			1	1,447				
	21019 Sw 125th Court Rd	1991	1							0	
	25050 SW 134th Ave	2016	16								
Naranja (Sunset Pointe)	26201 SW 139th Ct	1971	116					0		1	
	7143 SW 152nd Ct	1981	1					0			
	14232 SW 155th St	1984	4	0		0				0	
	15140 SW 156th Ave	2001	6			0	1,419				
	11630 SW 178th Ter	1971	1								
	10521 SW 184th St	1961	2			0					

	10621 SW 184th St	1961	2		0			
	11910 Sw 186th St	1958	1					0
	11870 Sw 187th St	1957	1					0
	11901 SW 187th St	1958	1					
	12015 SW 187th St	1958	11					
	12140 SW 187th St	1957	1					0
	12240 SW 187th Ter	1958	1					0
	11751 SW 188th Ter	1956	1					
Cutler Meadows Apartments	11051 SW 197th St	1976	90					
Caribbean Gardens Condo Asso	11309 SW 200th St	1973						
	10990 SW 202nd Dr	1965	16					
	11900 SW 202nd St	2002	56					
	19470 Sw 212th St	2004	1			0		
	12033 SW 213th Ter	1958	2			0		
	12024 SW 220th St	1953						
	12036 SW 220th St	1957						
	11775 Sw 223rd St	1957	4		0			
	17360 SW 232nd St	1959	64					
	11501 SW 250th St	2016	12			0		
	11435-11437 Booker T Wash	1958	2		0			
	14401-14403 Booker T Wash	1958	3		0			
	14425-14427 Booker T Wash	1958	3		0			
	10190 W Guava St	1969	2					0
Baynan Tree at the Hammods	9700-9912 Hammocks Blvd	1989	6			0		
	14500 Jefferson St	1958	6			0		
	14540 Jefferson St	1959	10			1		
Perrine Villas	10000 W Jessamine St	1983	20	0	0			
	11440 Lincoln Blvd	1958	2		0			
Old Dixie Apartments	26810 Old Dixie Hwy	2025	36			0		0
	11445 Robinson St	1958	2		0			
	11520 Robinson St	1958	6			0		
	11600 Robinson St	1958	6			0		
	11620 Robinson St	1958	6			0		

25. POLICE AND FIRE PROTECTION

A. If police/fire services, facilities or sites will be dedicated or otherwise provided on-site, describe them, specify any conditions of dedication and locate on Map H.

The Applicant defers to the Miami-Dade County police and fire departments to determine whether additional public safety facilities, equipment, or service levels are required to serve City Park. The Applicant will engage in ongoing coordination with those agencies and provide requested information to assist their determinations. Should the police or fire departments identify a discrete need (for example, a new station site, staffing increase, or interim contracted services), the Applicant will work with the County to evaluate feasible implementation approaches and to memorialize any agreed commitments in the development agreement and applicable permitting documents.

B. Provide correspondence from the appropriate providers acknowledging notice of the proposed development and phasing, and indicating whether present facilities and manpower are capable of serving the project or specifying the additional manpower/equipment necessary to serve the development. If the provider is from another jurisdiction, the letter should also identify any non-facility-related problems in providing said service.

Exhibit 25-1, **Letters to Departments,** will contain letters to the Miami-Dade Police and Fire Departments requesting acknowledgment of the proposed development and an indication whether present facilities and staffing are capable of serving the Project or specifying the additional staffing/equipment necessary to serve the development**.** Responses from the two departments are included. The Applicant will provide land for the fire facilities, and will work with the Miami-Dade Police Department in order to mitigate any impacts the project may have. The Police Department has stated that they do not object to this project.

EXHIBIT 25-1
Letter To and From Police Department
Letters To and From Fire Department
To Be Provided

THE CURTIS GROUP

October 1, 2025 **VIA EMAIL**

Captain George Perera
Strategic Planning and Development Section
Miami-Dade County Sheriff's Department
9105 NW 25th St., Suite 3102
Doral, FL 33172
spdsinfo@mdpd.com

Re: City Park DRI
Police Services

Dear Captain Perera:

In accordance with Chapter 380.06, Florida Statutes, regarding Developments of Regional Impact (DRI), we are required to obtain information from the Miami-Dade Police Department on its ability to provide the proposed City Park development with police services.

The Krome Groves Land Trust, et al, is seeking to develop a mixed-use project in unincorporated Miami-Dade County. **City Park DRI** consists of 990 acres bounded by SW 136 Street on the north, SW 162 Avenue on the east (generally), SW 152 Street on the south (generally) and SW 177 Avenue on the west.

Enclosed for your use are the following:

- Aerial Photograph showing project location; and,
- Table 1 describing the proposed development program.

Please indicate in your response whether the present facilities and staffing are capable of serving the Project or specifying the additional staffing/equipment necessary to serve the development.

I respectfully request your written response as soon as possible, since this will be an integral part of the DRI application process. Your prompt attention to this matter is greatly appreciated.

If you have any questions, please do not hesitate to contact me at (305)807-6306.

Sincerely,

Rob Curtis

Rob Curtis
The Curtis Group

Enclosures

Aerial Photograph

Development Program

The Applicant proposes development of the following mix of uses:

TABLE 1
Proposed Development Program

Land Use	Units (2026 – 2036)
Residential **- Single Family Detached** **- Single Family Attached** **- Multi-Family**	 1,029 homes 4,532 townhomes 2,239 units
Retail	749,153 sf
Office	500,000 sf
Industrial	892,484 sf
Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses, Open Space, Parks	249.5 acres

THE CURTIS GROUP

October 1, 2025 **VIA EMAIL**

Alejandro G Cuello, Principal Planner
Miami-Dade Fire Rescue Department
9300 NW 41 Street
Doral, FL 33178
acuello@miamidade.gov

Re: City Park DRI
Fire Protection and Emergency Medical Service

Dear Mr. Cuello:

In accordance with Chapter 380.06, Florida Statutes, regarding Developments of Regional Impact (DRI), we are required to obtain information from the Miami-Dade Fire Department on its ability to provide the proposed City Park development with fire protection and emergency medical services.

The Krome Groves Land Trust, et al, is seeking to develop a mixed-use project in unincorporated Miami-Dade County. **City Park DRI** consists of 990 acres bounded by SW 136 Street on the north, SW 162 Avenue on the east (generally), SW 152 Street on the south (generally) and SW 177 Avenue on the west. We had sent a previous letter in September 2005 reference this project, but the development program has changed.

Enclosed for your use are the following:

- Aerial Photograph showing project location; and,
- Table 1 describing the proposed development program.

Please indicate in your response whether the present facilities and staffing are capable of serving the Project or specifying the additional staffing/equipment necessary to serve the development.

I respectfully request your written response as soon as possible, since this will be an integral part of the DRI application process. Your prompt attention to this matter is greatly appreciated.

If you have any questions, please do not hesitate to contact me at (305)807-6306.

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Retail	749,153 sf
Office	500,000 sf
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Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses, Open Space, Parks	249.5 acres

26. RECREATION AND OPEN SPACE

See State Comprehensive Plan (Chapter 187, F.S.)
Goal (10); Policies (11), (12), (13)
Goal (16); Policy (1)
Goal (18); Policies (1), (3), (4), (6)

Adopted Level of Service Standard: 2.75 acres of local recreational open space per 1,000 residents.

Existing Level of Service: Property is currently vacant.

Level of Service After Project Buildout: City Park proposes **7,800 housing units**, which at **2.67 persons per household** yields an anticipated project population of **20,826 persons** (7,800 × 2.67 = 20,826). Using the County's adopted recreational open-space Level-of-Service standard of **2.75 acres per 1,000 residents**, the required open space for City Park is calculated as follows:

- Project population = **20,826 persons**
- LOS standard = **2.75 acres / 1,000 residents**
- Required open space = 2.75 × (20,826 / 1,000) = **57.27 acres** (rounded to two decimal places).

The City Park master plan provides **249.5 acres** of open space in total. Under County practice, **66.0 acres** of that total are stormwater lakes and are **not** eligible for private open-space LOS credit unless they are formally dedicated and accepted as public parkland. Excluding the lakes (249.50 − 66.00 = **183.50 acres**), the project's credited recreational open space is **183.50 acres**. The County LOS requirement for the projected buildout population (20,826 persons at 2.75 acres per 1,000 residents) is **57.27 acres**; therefore City Park provides a **surplus of 126.23 acres** above the LOS minimum (183.50 − 57.27 = **126.23 acres**), or roughly **3.20 times** the required standard.

A. Describe the recreational facilities and open space (including acreage) which will be provided on-site. Locate on Map H. Identify which of these areas or facilities will be open to the general public.

The Applicant proposes to set aside approximately 249.5 acres of land for use as public or private, community controlled open space, as part of the project. No active facilities are planned at this time.

B. Will parks and open space be dedicated to the city or county? If not, who will maintain the facilities?

The Applicant is planning for the establishment of numerous public and community-based open spaces and recreational areas. Any privately owned parks or open space shall be maintained by a Homeowners Association or a similar entity.

C. Please describe how the proposed recreation and open space plan is consistent with local and regional policies.

City Park is consistent with the following Objectives and Policies contained within the Miami-Dade Comprehensive Development Master Plan, with respect to Recreation and Open Space:

Objective 1
Provide a coordinated system of areawide parks and recreational open spaces serving the entire County, and local recreation open spaces adequately meeting the needs of Dade County's unincorporated population, through the year 2005.

City Park will provide a system of coordinated open space and parks as part of its development plan.

Policy 1B
In unincorporated areas, local recreation open space shall consist of the following: 1) County-provided local parks consisting of mini-parks, neighborhood parks community parks, single-purpose parks, and portions of district and areawide parks used as a local recreation open space and similarly designated in the facility inventory maintained by the Metro-Dade Park and Recreation Department; 2) public schools and public college playfields that are used as local recreation open space or that are included under the Joint Parks-School Agreement between the County and the Dade County School Board or State Board of Regents, and; 3) fifty percent of the private recreation open space and facilities located inside the Urban Development Boundary (UDB).

Objective 2
Require the availability of adequate local recreation open space as a condition for the approval of residential development orders, and maintain an adequate inventory of recreational areas and facilities through the year 2005.

City Park is including 249.5 acres of open space as part of its Application for Development Approval.

Policy 2A
Metro-Dade County's minimum Level of Service (LOS) standard for the provision of recreation open space shall be the following:
i.) 2.75 acres of local recreation open space per 1,000 residents.

The approximately 183.50 acres, as described above, proposed by the City Park development will be consistent with the Level of Service standard for Miami-Dade County.

City Park is consistent with the following goals and objectives of the South Florida Regional Policy Plan with respect to Green Infrastructure

Policy 10.2
Maintain and revitalize parks so that they offer comfort, sociability, access, and a variety of activities to meet the mixed and varied needs of their visitors.

City Park will provide 249.5 acres of open space as part of a comprehensive development plan. It will be tailored to the needs of the City Park community and to the needs of residents of Miami-Dade County.

27. EDUCATION

A. If the development contains residential units, estimate the number of school age children expected to reside in the development. Use class breakdowns appropriate to the area in which the development is located (specify on chart below).

Based on the residential breakdown of the development, a total of 1,847 school age children are expected to reside in City Park.

TABLE 27-1
Number Of School Age Children in the Development

	Units	Students / Unit	Elementary	Middle	Senior
Single Family	1,029 Units 368 Students	0.357	159 Students	87 Students	122 Students
Town Homes	4,532 Units 1,130 Students	0.249	488 Students	267 Students	375 Students
Multi-Family	2,239 Units 349 Students	0.156	151 Students	82 Students	116 Students
Student Totals	**7,800 Units** **1,847 Students**	–	**798** **Elementary**	**436** **Middle**	**613** **Senior**

Source: The Curtis Group

Note: Assumed average dwelling unit size: single-family detached 2,234 sf; townhouse 1,558 sf; and, multi-family 975 sf.

There are three schools that currently would serve the City Park DRI, based on the current attendance boundaries – Norma Butler Bossard Elementary School, Jorge Mas Canosa Middle School, and Miami Southridge Senior High School.

TABLE 27-2
Enrollment Impact Area

Schools Impacted By Boundary	Membership '24 - '25 FTE/with City Park	FISH Design Capacity Total*	% Utilization Total/with City Park
Norma Bossard Elementary	961	1,032	93%
	1,759		170%
Jorge Mas Canosa Middle	1,203	1,973	68%
	1,639		83%
Miami Southridge Senior High	2,186	2,861	76%
	2,799		98%

Source: The Curtis Group

*Capacity numbers from the most recently available Miami-Dade County Public Schools (MDCPS) Five Year Facilities Work Program

The Dr. Gilbert L. Porter Elementary may also serve City Park and provide relief

to the Norma Bossard Elementary. Based on October 2024 FTE Survey, Porter Elementary has 585 students and a FISH Design Capacity of 937 students resulting in available capacity for an additional 352 elementary school students.

B. Will school facilities or sites be dedicated or otherwise provided on the site?

Three new schools, with a combined design capacity of 3,863 students, are proposed as part of the City Park DRI development program. These include an elementary school with capacity for 1,011 students, a middle school designed for 1,222 students, and a high school accommodating up to 1,630 students. Based on enrollment projections, City Park is expected to generate fewer students than this total capacity, resulting in a surplus of approximately 2,016 student stations. This excess capacity will not only meet the needs of City Park residents but will also help relieve existing and future overcrowding pressures on surrounding area schools.

TABLE 27-5
Impact Of Proposed Schools On Existing Conditions

	City Park FTE Membership	FISH Design Capacity Total	Excess FISH Design Capacity
Development Provided Elementary	798	1,011	213
Development Provided Middle	436	1,222	786
Development Provided Senior High	613	1,630	1,017
Sub-Total Schools Provided by Development		3,863	
Proposed Development	1,847	3,863	(2,016)

Source: The Curtis Group

The proposed schools are designed to accommodate all students generated by City Park. With the inclusion of the 1,630-station high school, the area will realize a surplus of approximately 1,017 senior high school student stations. Similarly, the elementary and middle schools will provide significant excess capacity, with 213 and 786 student stations available, respectively.

In addition, as outlined in the Applicant's response to Question 11 – Revenue Generation, at full buildout the Developer will contribute $15,369,768 in non-recurring school impact fees. In addition, residents of the City Park DRI will generate an estimated $14,606,228 in recurring school impact fees through annual property tax payments to Miami-Dade County

.

C. Attach a letter from the appropriate school board, acknowledging receipt of the estimated school age population information in (A) above, and providing a statement of what capital improvement adjustment would be necessary to accommodate these students.

A letter to Miami-Dade Public Schools and the response from them will be provided in **Exhibit 27-1**.

Exhibit 27-1
Letters To and From the School Board
To Be Provided

THE CURTIS GROUP

October 1, 2025

Mr. Ivan Rodriguez
Miami-Dade County Public Schools
Facilities Operations, Maintenance and Planning
1450 N.E. 2nd Avenue
Suite 525
Miami, Florida 33132
irodrigu@dadeschools.net

Re: City Park Development of Regional Impact
Schools

Dear Mr. Rodriguez:

In connection with the submittal of the above-referenced Development of Regional Impact, we have been asked to attach a letter from the school board, acknowledging receipt of the estimated school age population information we have included and providing a statement of what capital improvement adjustments would be necessary to accommodate these students.

The Krome Groves Land Trust, et al, is seeking to develop a mixed-use project in unincorporated Miami-Dade County. **City Park DRI** consists of 990 acres bounded by SW 136 Street on the north, SW 162 Avenue on the east (generally), SW 152 Street on the south (generally) and SW 177 Avenue on the west.

Enclosed for your use are the following:

- Development program
- Aerial Photograph showing project location

Please indicate in your response whether the present facilities and staffing are capable of serving the Project or specifying the additional staffing/equipment necessary to serve the development.

I respectfully request your written response as soon as possible, since this will be an integral part of the DRI application process. Your prompt attention to this matter is greatly appreciated.

If you have any questions, please do not hesitate to contact me at (305)807-6306.

Sincerely,

Rob Curtis

Rob Curtis
The Curtis Group

Aerial Photograph

City Park DRI Proposed Development Program	
Land Use	**2007 - 2015**
Residential **Single Family** **Townhouse** **Condominium (MF)**	 2,100 du 2,100 du 2,000 du
Retail	200,000 sf
Medical Office	100,000 sf
Industrial – Flex space	33 acres
Schools	K-8 – 3,200 students High School – 1,600 students
Hospital	80 beds
Community Uses **Library, Police, Fire**	 5 acres
Parks	46 acres


SW 177th (Krome) Ave
SW 136th St
SW 152nd St
SW 167th Ave
SW 162nd Ave

Development Program

The Applicant proposes development of the following mix of uses:

TABLE 1 Proposed Development Program	
Land Use	**Units (2026 – 2036)**
Residential **- Single Family Detached** **- Single Family Attached** **- Multi-Family**	 1,029 homes 4,532 townhomes 2,239 units
Retail	749,153 sf
Office	500,000 sf
Industrial	892,484 sf
Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses, Open Space, Parks	249.5 acres

28. HEALTH CARE

A. Describe the health care services and facilities that will be required to meet the health needs generated by this project. Please provide a letter from the various providers acknowledging notice of proposed development and ability to serve the project.

City Park will be located within a 10-mile radius of 6 hospitals including:

1 Community Health of South Dade, Inc.
10300 SW 216th Street
Miami, Fl 33190

2 Homestead Hospital
160 NW 13th Street
Homestead, FL 33030
AHCA #: 100125
License Holder: Baptist Health Systems

3 Baptist Hospital
8900 North Kendall Drive Miami, FL 33176
AHCA #: 100008
License Holder: Baptist Health South Florida

4 Kendall Regional Medical Center
11750 S.W. 40th Street
Miami, FL 33175
AHCA #: 100209
License Holder: Kendall Healthcare Group

5 Jackson South Community Hospital
9333 S.W. 152nd Street
Miami, FL 33157
AHCA #: 100208
License Holder: Public Health Trust of Dade County

6 South Miami Hospital
6200 S.W. 73rd Street
Miami, FL 33143
AHCA # 100154
License Holder: Baptist Health South Florida

Exhibit 28-1, Letters to Service Providers, includes a letter from the Applicant to the various hospitals requesting acknowledgement of notice of this proposed development and requesting information indicating whether present emergency medical service

facilities and staff power are capable of serving the Project or, if not, specifying the necessary staff and equipment necessary to do so.

EXHIBIT 28-1

Letters to and from Service Providers

THE CURTIS GROUP

October 1, 2025 **VIA EMAIL**

Mr. Joe Natoli
Executive Vice President &
Chief Administrative Officer.
Baptist Health Systems
6855 Red Road
Coral Gables, FL 33143
JoeNa@BaptistHealth.net

Re: City Park DRI
Health Care Services

Dear Mr. Natoli:

In accordance with Chapter 380.06, Florida Statutes, regarding Developments of Regional Impact (DRI), we are required to obtain information from health service providers on their ability to provide the proposed City Park development with health care services.

The Krome Groves Land Trust, et al,(the "Applicant") are seeking to develop a mixed-use project in unincorporated Miami-Dade County. **City Park DRI** consists of 990 acres bounded by SW 136 Street on the north, SW 162 Avenue on the east (generally), SW 152 Street on the south (generally) and SW 177 Avenue on the west.

Enclosed for your use are the following:

- Aerial Photograph showing project location; and,
- Table 1 describing the proposed development program.

Please indicate in your response whether present facilities and staffing are capable of serving the Project or specifying the additional staffing/equipment necessary to serve this development.

I respectfully request your written response as soon as possible, since this will be an integral part of the DRI application process. Your prompt attention to this matter is greatly appreciated.

If you have any questions, please do not hesitate to contact me at (305)807-6306.

Sincerely,

Rob Curtis

Rob Curtis
The Curtis Group

Enclosures

Aerial Photograph

Development Program

The Applicant proposes development of the following mix of uses:

TABLE 1
Proposed Development Program

Land Use	Units (2026 – 2036)
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Industrial	892,484 sf
Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses, Open Space, Parks	249.5 acres

THE CURTIS GROUP

October 1, 2025 **VIA EMAIL**

Mr. Isa Nunez
Vice President Construction & Design
Jackson Health System
1611 NW 12th Avenue
Miami, FL 33136
Isa.nunez@jhsmiami.org

Re: City Park DRI
Health Care Services

Dear Ms. Nunez:

In accordance with Chapter 380.06, Florida Statutes, regarding Developments of Regional Impact (DRI), we are required to obtain information from health service providers on their ability to provide the proposed City Park development with health care services.

The Krome Groves Land Trust, et al, (the "Applicant") are seeking to develop a mixed-use project in unincorporated Miami-Dade County. **City Park DRI** consists of 990 acres bounded by SW 136 Street on the north, SW 162 Avenue on the east (generally), SW 152 Street on the south (generally) and SW 177 Avenue on the west.

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Please indicate in your response whether present facilities and staffing are capable of serving the Project or specifying the additional staffing/equipment necessary to serve this development.

I respectfully request your written response as soon as possible, since this will be an integral part of the DRI application process. Your prompt attention to this matter is greatly appreciated.

If you have any questions, please do not hesitate to contact me at (305)807-6306.

Sincerely,

Rob Curtis

Rob Curtis
The Curtis Group

Enclosures

Aerial Photograph

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Community Uses, Open Space, Parks	249.5 acres

THE CURTIS GROUP

October 1, 2025 **VIA EMAIL**

Mr. Kenneth Gould
Vice President of Logistics & Facilities
Doris Ison Health Center 10300 SW 216th Street,
Miami, FL 33190
kgould@chisouthfl.org

Re: City Park DRI
Health Care Services

Dear Mr. Gould:

In accordance with Chapter 380.06, Florida Statutes, regarding Developments of Regional Impact (DRI), we are required to obtain information from health service providers on their ability to provide the proposed City Park development with health care services.

The Krome Groves Land Trust, et al, (the "Applicant") are seeking to develop a mixed-use project in unincorporated Miami-Dade County. **City Park DRI** consists of 990 acres bounded by SW 136 Street on the north, SW 162 Avenue on the east (generally), SW 152 Street on the south (generally) and SW 177 Avenue on the west.

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If you have any questions, please do not hesitate to contact me at (305)807-6306.

Sincerely,

Rob Curtis
The Curtis Group

Enclosures

Aerial Photograph

Development Program

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Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses, Open Space, Parks	249.5 acres

THE CURTIS GROUP

October 1, 2025 **VIA EMAIL**

Mr. Joe Britner
Chief Operating Officer
HCA Florida Kendall
11750 SW 40 Street
Miami, FL 33175
joe.britner@hcahealthcare.com

Re: City Park DRI
Health Care Services

Dear Mr. Britner:

In accordance with Chapter 380.06, Florida Statutes, regarding Developments of Regional Impact (DRI), we are required to obtain information from health service providers on their ability to provide the proposed City Park development with health care services.

The Krome Groves Land Trust, et al, (the "Applicant") are seeking to develop a mixed-use project in unincorporated Miami-Dade County. **City Park DRI** consists of 990 acres bounded by SW 136 Street on the north, SW 162 Avenue on the east (generally), SW 152 Street on the south (generally) and SW 177 Avenue on the west.

Enclosed for your use are the following:

- Aerial Photograph showing project location; and,
- Table 1 describing the proposed development program.

Please indicate in your response whether present facilities and staffing are capable of serving the Project or specifying the additional staffing/equipment necessary to serve this development.

I respectfully request your written response as soon as possible, since this will be an integral part of the DRI application process. Your prompt attention to this matter is greatly appreciated.

If you have any questions, please do not hesitate to contact me at (305)807-6306.

Sincerely,

Rob Curtis

Rob Curtis
The Curtis Group

Enclosures

Aerial Photograph

Development Program

The Applicant proposes development of the following mix of uses:

TABLE 1
Proposed Development Program

Land Use	Units (2026 – 2036)
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Industrial	892,484 sf
Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses, Open Space, Parks	249.5 acres

29. ENERGY

A. Provide a projection of the average daily energy demands at the end of each development phase for each of the following: electrical power, gas, oil, coal, etc. For electrical power, also provide the peak hour demand at the end of each phase.

Projected average daily electrical demands are summarized in **Table 29-1, Projected Electrical Energy Demand**. Based upon the Maximum Impact Development Scenario (MIDS), the project will have an annual energy demand of 120,754,711 kWh, a cumulative total daily demand of 330,835 kWh and a cumulative total Peak Hour Demand of 4,483 kWh.

TABLE 29-1
Projected Electrical Energy Demand

Land Use	Units (2026 – 2036)	Annual Energy (kWh/yr)	Daily Energy (kWh/day)	Peak Hour (kWh =kW)
Residential				
- SF Detached	1,029 homes	11,319,000	31,011	4,522
- SF Attached	4,532 townhomes	40,788,000	111,748	13,969
- Multi-Family	2,239 units	14,553,500	39,873	4,153
Retail	749,153 sf	20,227,131	55,417	9,236
Office	500,000 sf	11,000,000	30,137	4,395
Industrial	892,484 sf	16,064,712	44,013	5,502
Schools	Elementary – 1,011 students	1,516,500	4,155	606
	Middle – 1,222 students	2,016,300	5,524	806
	High School – 1,630 students	3,178,500	8,708	1,270
Community Uses Open Space, Parks	249.5 acres	91,068	250	25
	TOTAL	**120,754,711**	**330,835**	**44,483**

Source: The Curtis Group

B. If there is to be an on-site electrical generating facility (post-construction) describe its proposed capacity and use.

No on-site electrical generating facilities are proposed.

C. If energy (electrical power, natural gas, etc.) is to be obtained from an off-site source, attach a letter from the firms or agencies providing service outlining:

1. **The projected excess capacities of the facilities and transmission line to which connection will be made at present and for each phase through completion of the project,**
2. **Any other commitments that have been made for this excess capacity,**
3. **A statement of the supplier's ability to provide service at all times during and after development. (The supplier must be provided with demand information in (A) above.)**

Exhibit 29-1, Letters to and from Florida Power and Light (FPL), includes a request that FPL provide the information outlined above dealing with projected excess facility capacities, commitments and the ability of the facilities to provide service to the Project Site at all times during and after development.

A response letter from FPL stating their ability to provide power to the development will be attached when it is received.

D. Describe any energy conservation methods or devices incorporated into the plan of development. What considerations relative to energy conservation will be incorporated into the site planning, landscape, and building design, and equipment and lighting selection for this project?

The following energy conservation measures may be incorporated into site planning, building design, and equipment selection where feasible:

- Integrated landscaping along streets, building and parking areas can reduce heat gain from paved and impervious areas.
- All building design and construction for the Project will meet applicable requirements of the South Florida Building Code and the Florida Energy Efficient Building Code.

E. Responses to Review Agency Requirements Detailed in the Agreement to Delete Questions, Appendix A

In Miami-Dade County, buildings account for more than 40% of greenhouse gas emissions. Land Use Element Objective LU-lO 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.

City Park is being planned as a compact, mixed-use, transit-oriented community that reduces vehicle miles traveled and concentrates homes, jobs and services so more trips are walkable, bikeable or served by shared shuttles. At the site and building scale the project will pursue energy-efficiency and low-carbon pathways — including high-performance building envelopes, electrification-ready design, distributed solar. At the urban scale the plan increases permeable green area and

native tree canopy, prioritizes cool roofs and high-albedo pavements in high-use public spaces, and integrates vegetated stormwater features and green corridors to provide evaporative cooling and shade. These combined actions reduce cooling loads, lower on-site GHG emissions, and reduce surface and air temperatures that contribute to the UHI effect.

Planned measures and options under consideration include:

- Land-use & Mobility: mixed-use Village Core, TOD node, dedicated bike lane, and off-street greenway network.

- Buildings & Energy: energy-efficient design for all-electric building systems where feasible; required cool-roof performance for non-residential and larger multi-family buildings; building envelopes that exceed code; and optional low-energy HVAC packages for homes.".

- Materials & Surfaces: high-albedo paving in plazas and sidewalks, porous/permeable pavement pilots for secondary streets and parking, and specification of reflective SRI thresholds for curated public surfaces.

- Nature-Based Cooling: increase native canopy, bioswale corridors, and lakes/shoreline oriented design to maximize micro-climate cooling while meeting County policy on park dedications and LOS.
- Electrification & EV Support: EV-ready residential parking (Level-2 optional), phased installation of Level-2 workplace and public chargers, dedicated depot chargers for shuttle/fleet electrification, and managed/ off-peak charging strategies.

The City Park approach directly implements the types of actions recommended in Miami-Dade's Climate Action Strategy (energy & buildings, land use & transportation, and electrification priorities) and supports CDMP objectives that call for climate-aware land-use planning, reduction of vehicle dependence, and strategies to reduce Urban Heat Island impacts (e.g., canopy, cool roofs, permeable surfaces). The project's combination of land-use, building and landscape measures aligns with the County's direction to cut GHGs and adapt community design to reduce heat and increase resilience.

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.

Miami-Dade's 2021 Urban Tree Canopy Assessment documents a clear

relationship between development intensity and surface/air temperature — including the order-of-magnitude differences cited (large surface temperature spreads between the most and least developed areas and localized increases of ~6–7.5°F associated with conversion of pervious to impervious surfaces). The Applicant acknowledges these findings and has designed City Park specifically to avoid reproducing the heat-intensifying patterns described in the Assessment.

City Park's response targets the two principal, local drivers of increased heat identified in the Assessment: (a) loss of vegetative cover (tree canopy) and (b) increased heat-absorbing impervious surfaces and waste heat from buildings and vehicles. The project employs a layered strategy — land-use, landscape, materials, building systems and mobility measures — to reduce both surface temperatures and source emissions:

- Land-use & Mobility: mixed-use Village Core, TOD node, dedicated bike lane, and off-street greenway network.

- Buildings & Energy: energy-efficient design for all-electric building systems where feasible; required cool-roof performance for non-residential and larger multi-family buildings; building envelopes that exceed code; and optional low-energy HVAC packages for homes.".

- Materials & Surfaces: high-albedo paving in plazas and sidewalks, porous/permeable pavement pilots for secondary streets and parking, and specification of reflective SRI thresholds for curated public surfaces.

- Nature-Based Cooling: increase native canopy, bioswale corridors, and lakes/shoreline oriented design to maximize micro-climate cooling while meeting County policy on park dedications and LOS.
- Electrification & EV Support: EV-ready residential parking (Level-2 optional), phased installation of Level-2 workplace and public chargers, dedicated depot chargers for shuttle/fleet electrification, and managed/ off-peak charging strategies.

The portfolio of measures above is consistent with CDMP directives to consider high-albedo surfaces, porous pavement, tree canopy and cool roofs (LU-10I), and aligns with the County's Climate Action Strategy goals on buildings, energy and transportation.

City Park's combined land-use, landscape and building strategies are designed to avoid the heat-intensifying outcomes described in the 2021 Urban Tree Canopy Assessment. By emphasizing distributed canopy, high-albedo and permeable surfacing, building electrification, the project will reduce projected local surface and air temperatures and cut GHG emissions in a manner consistent with Miami-Dade County policy and the Climate Action Strategy.

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.

City Park is planned as a compact, mixed-use, transit-oriented community (TOD node, Village Core, retail and jobs proximate to housing) and therefore is expected to generate substantially different trip patterns than a conventional, dispersed suburban subdivision. The Applicant will provide an air quality study after the transportation analysis has been reviewed and determined to be sufficient, and the Applicant has met with DERM and FDEP to determine which intersections and parking facilities are substantially impacted by project traffic. FDEP guidelines require that all LOS E and F intersections impacted by 5% or more of project traffic, and surface parking areas accommodating 1500 vehicle trips per hour, or parking garages accommodating 750 vehicles per hour be considered for air quality modeling.

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-lOl 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.

While new development introduces some impervious surfaces, City Park has been intentionally planned to reduce net Urban Heat Island (UHI) impacts compared to a conventional suburban/industrial redevelopment by prioritizing large, distributed open space, extensive tree canopy, water features, high-performance surface materials, shaded pedestrian corridors, building electrification and rooftop solar, and EV charging. In short, City Park trades single-use industrial row-crop farming acreage for a balanced mosaic of shade, vegetated surfaces, water cooling, reflective materials and low-carbon mobility options — consistent with CDMP LU-10I strategies and the County's Climate Action goals.

I. How City Park avoids becoming a net UHI source

1. Large, connected open-space system.
    - The master plan dedicates 249.5 acres of open space (parks, greenways and publicly accessible lake edges) — roughly 25% of the site — and reserves an additional network of street trees and bioswale corridors across the remaining area. Converted lakes (66 acres) plus vegetated greenway corridors and canopy planting substantially increase pervious area and provide evaporative cooling and shading that reduce local surface and air temperatures.
2. Tree canopy & shade strategy.
    - City Park will provide significant urban tree canopy coverage across the developed site. The canopy will comprise native, climate-adapted species arranged to shade sidewalks, parking lots, plazas and playgrounds.
3. High-albedo and cool roofing requirements.

- The Applicant is evaluating cool roof systems (high solar reflectance) on non-residential buildings, multi-family buildings, and single-family units. The cool roofs reduce rooftop heat gain, lower building cooling energy demand, and reduce heat re-radiation to the street.

4. High-reflectance pavement & porous materials.
   - Consider the use high-albedo surface treatments for pedestrian pavements, plaza surfaces, and parking lot surface area within mixed-use nodes; where structurally and hydrologically feasible implement permeable pavement for parking and secondary streets (bioretention / pervious concrete / permeable pavers).
5. Vegetated stormwater & blue infrastructure as cooling systems.
   - Integrate lakes, vegetated swales, and bioswales as multi-functional assets — stormwater attenuation, habitat, and evaporative cooling. Where lakes are publicly accessible, design promenades with shade and native planting to maximize comfort and microclimate benefits.
6. Compact, walkable urban form (reduced vehicle heat and emissions).
   - City Park concentrates higher intensity mixed use, retail and employment around the Village Core and TOD so daily needs are reachable by walking, biking or shuttle — this reduces vehicle miles traveled (VMT) and tailpipe heat/emissions relative to dispersed development patterns.

City Park replaces a industrial agricultural pattern with a climate-responsive neighborhood built around a large, connected park system, an increased tree canopy, cool surfaces, permeable hydrology and an aggressive EV strategy. These combined measures will reduce City Park's contribution to the Urban Heat Island Effect, lower on-site and regional greenhouse-gas emissions, and support County objectives under CDMP LU-10I and the County Climate Action Strategy.

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

The Applicant is considering the following**:**

1. EV-ready residential infrastructure.
   - EV-ready residential parking (Level-2 optional), phased installation of Level-2 workplace and public chargers, dedicated depot chargers for shuttle/fleet electrification, and managed/ off-peak charging strategies.

2. Public & workplace charging (commercial / office / retail).
   - Provide EV charging infrastructure in non-residential parking areas consistent with TOD and employer needs.
3. TDM and supporting measures.
   - As proposed in in Question 21 – Transportation, City Park will provide active Travel Demand Management (TDM) to reduce vehicle trips.

EXHIBIT 29-1
Letters to and from
Florida Power and Light

October 1, 2025 **VIA EMAIL**

Mr. Martha DiPietro
Florida Power & Light
4200 W Flagler Street
Miami, Florida 33134
martha.dipietro@fpl.com

Re: Request for Electric Service Capacity Confirmation — City Park DRI (Sec. 380.06, F.S.)

Dear Ms. DiPietro:

Pursuant to Section 380.06, Florida Statutes (Developments of Regional Impact), applicants must obtain confirmation from public service providers regarding the ability to serve the proposed development. We are requesting Florida Power & Light's confirmation of electric service for the **City Park** project.

The **Krome Groves Land Trust, et al.** (the "Applicant") proposes a mixed-use development in unincorporated Miami-Dade County. The City Park DRI encompasses approximately **990 acres** generally bounded by **SW 136 Street** (north), **SW 162 Avenue** (east, general), **SW 152 Street** (south, general), and **SW 177 Avenue** (west).

Enclosures

- Figure 1: Aerial photograph showing project location
- Table 1: Proposed development program

Requested information (for inclusion with the DRI application)

The projected available (excess) capacity of the FPL distribution/transmission facilities to which the project will connect;

- Any other known commitments drawing on that same capacity; and
- A statement of FPL's ability to provide service reliably during construction and upon build-out.
- *If available:* identification of any required system upgrades, typical lead times, and any standard conditions (e.g., line-extension agreements, easements).

We would appreciate your written response at your earliest convenience, as it is an integral component of the DRI submittal.

If you have any questions, please contact me at **(305) 807-6306**.

Sincerely,

Rob Curtis
The Curtis Group

Enclosures

Aerial Photograph

Development Program

The Applicant proposes development of the following mix of uses:

TABLE 1
Proposed Development Program

Land Use	Units (2026 – 2036)
Residential **- Single Family Detached** **- Single Family Attached** **- Multi-Family**	 1,029 homes 4,532 townhomes 2,239 units
Retail	749,153 sf
Office	500,000 sf
Industrial	892,484 sf
Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses, Open Space, Parks	249.5 acres

30. HISTORICAL AND ARCHAEOLOGICAL SITES

A. 1. Describe any known historical or archaeological sites on the development site. Provide a letter from the Department of State, Division of Historical Resources (DHR) which includes a list of known sites within the development site, the likelihood of historical or archaeological sites occurring within the development site, whether a site survey is needed, and whether any known sites are significant.

An archaeological assessment was conducted by Archaeological and Historical Conservancy, Inc. and is included in **Exhibit 30-1**. No archaeological or historical sites were documented on the parcel as a result of this assessment nor are there any sites regarded as being potentially eligible for listing on the National Register of Historic Places on the parcel. No historical or archaeological sites are shown to exist in the Miami-Dade County Comprehensive Development Master Plan (CDMP**)** on the parcel.

Exhibit 30-2, Letter From the Department of State, Division of Historical Resources (DHR), includes a letter from DHR stating that it concurs that a cultural resource survey should be conducted on this site. The cultural resources survey that was recommended to be done is included as part of the archaeological assessment in Exhibit 30-1.

2. If DHR recommends that a site survey be done, the results of such a survey, conducted for the development site by an acceptable professional, should be provided.

As recommended by DHR, a reconnaissance level archaeological survey of the parcel was undertaken. The survey found no historic or archaeological sites located within the parcel that have a probability of being considered potentially eligible for listing on the National Register of Historic Places. The report is included in **Exhibit 30-1**.

B. If significant historical or archaeological sites exist on-site, indicate what measures would be taken to protect them, or to minimize or mitigate impacts to them. Where appropriate, describe the measures for providing public access to the sites.

Not applicable. There are no historical or archaeological sites in the project vicinity.

C. Additional Review Agency Request

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.

As recommended by DHR, a reconnaissance level archaeological survey of the parcel was undertaken. The survey found no historic or archaeological sites located within the parcel that have a probability of being considered potentially eligible for listing on the National Register of Historic Places. The report is included in **Exhibit 30-1**.

EXHIBIT 30-1
An Archaeological Reconnaissance Survey
Of the City Park Project
By Archaeological and Historical Conservancy, Inc.

A PHASE I CULTURAL RESOURCE ASSESSMENT SURVEY OF THE CITY PARK PARCEL, MIAMI-DADE COUNTY, FLORIDA

ARCHAEOLOGICAL AND HISTORICAL CONSERVANCY, INC.

AHC TECHNICAL REPORT NO. 1515
AHC PROJECT NO. 2025.104
AUGUST 2025

A PHASE I CULTURAL RESOURCE ASSESSMENT SURVEY OF THE CITY PARK PARCEL, MIAMI-DADE COUNTY, FLORIDA

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For:
The Curtis Group

AHC PROJECT NO. 2025.104
AHC TECHNICAL REPORT NO. 1515
AUGUST 2025

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CONSULTANT SUMMARY

In August 2025, the Archaeological and Historical Conservancy, Inc. (AHC) conducted a Phase I Cultural Resource Assessment Survey (CRAS) of the ±937-acre City Park parcel, located in southwestern Miami-Dade County, Florida. The assessment was conducted on behalf of The Curtis Group to identify and evaluate any archaeological or historical resources that may be present within the project parcel.

The survey was performed in compliance with applicable federal, state, and local regulations, including Section 106 of the National Historic Preservation Act of 1966 (as amended), 36 C.F.R. Part 800 (Protection of Historic Properties), Chapter 267, Florida Statutes, and the guidelines outlined in Chapter 1A-46, Florida Administrative Code and Module Three. The project also meets the cultural resource assessment requirements of the Miami-Dade County Historic Preservation Ordinance.

This Phase I cultural resource assessment included an archival review, a pedestrian survey, and shovel testing across the parcel. A search with the Florida Master Site File (FMSF) determined that there are no archaeological sites recorded within one mile of the project parcel. A review of historical aerial photographs, including one from 1940, indicated that the parcel historically consisted of a largely homogenous pine rockland and wetland prairie, with a remnant creek in the southeastern corner and a pine flatwood forest along its southern bank (Figure 3).

The majority of the parcel was classified as a low probability zone (LPZ) and was subjected to systematic subsurface testing at 100-meter intervals along transects spaced 400 meters apart, resulting in a 25% sample of the LPZ. The remnant pine flatwoods area was determined to be a medium probability zone (MPZ; Figure 11) and was tested systematically at 50m intervals and judgmentally.

A total of 108 shovel tests were excavated across the parcel, including 97 systematic tests in the LPZ, 7 systematic tests in the MPZ, and 4 judgmental tests (Figure 12). Stratigraphy was largely uniform across the parcel, consisting of disturbed grayish brown (10YR 5/2) fine loamy sand overlying bedrock, typically encountered between 20 and 35 centimeters below the surface (Figure 13). All tests were negative, and no cultural materials were observed or collected.

The segment of a spur of one historic linear resource, the CSX Railroad, crosses the project parcel within a separate railroad easement. Other segments of the CSX Railroad have been previously recorded with the FMSF. The resource is a single, standard gauge railroad track on gravel ballast that enters the parcel from the north, 500 feet east of its northwest corner, curves eastward 600 feet south of the parcel's northern border and crosses the parcel due east, exiting it 600 feet south of its northeast corner. The segment of the railroad crossing the project parcel was laid between 1957 and 1964. It is newly recorded as 8DA23545 in accordance with State requirements.

It is the consultant's opinion that no cultural resources potentially eligible for listing in the NRHP occur within the project parcel; however, linear resource 8DA23545 occurs within a railroad easement crossing the parcel. There is insufficient information to determine whether 8DA23545 meets eligibility criteria for listing in the National Register of Historic Places (NRHP).

In the event that prehistoric resources are uncovered during ground disturbing activities, the consultant archaeologist and regulating agencies should immediately be notified. If human remains are uncovered then the provisions of Chapter 872.05, Florida Statutes, will apply.

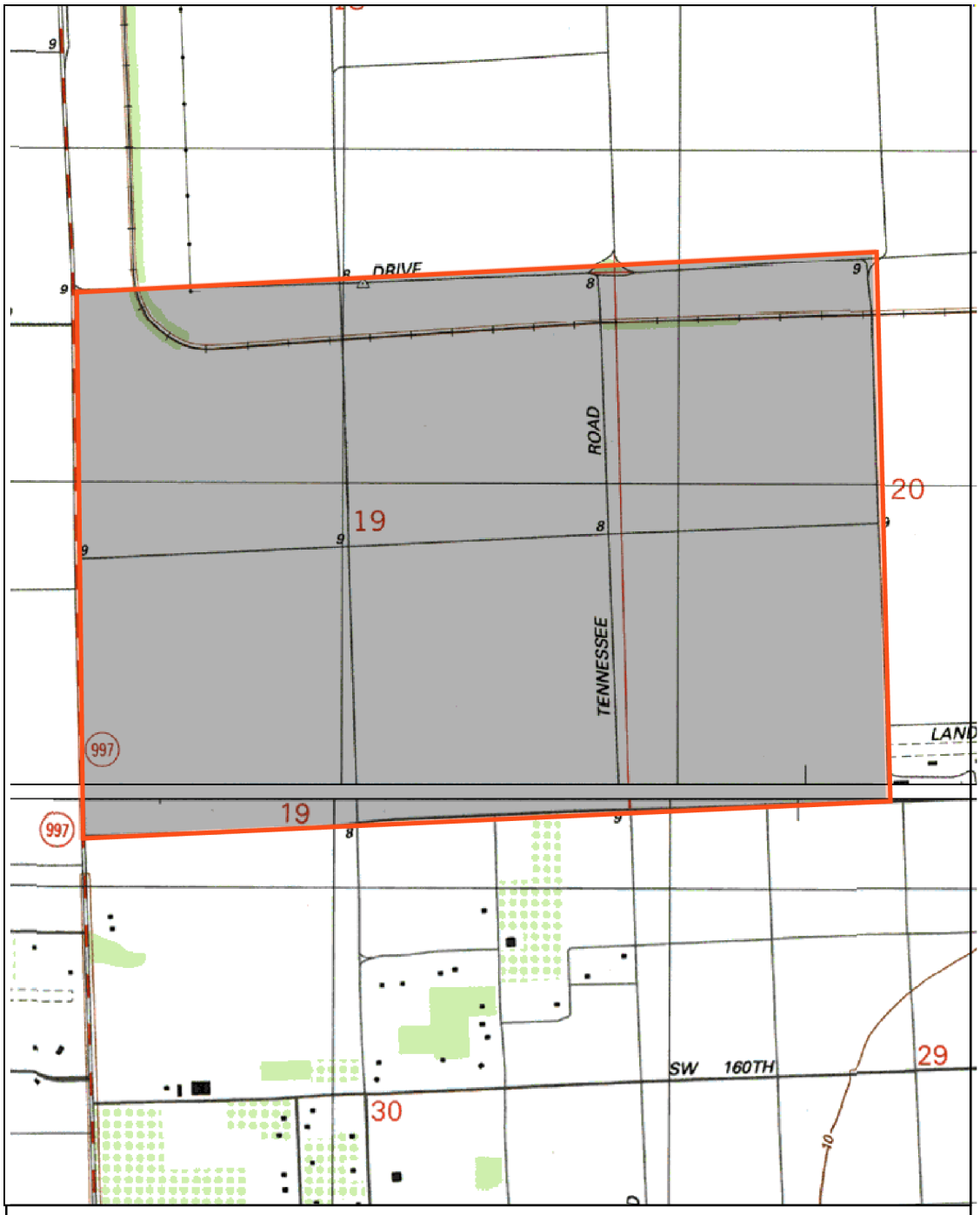

Figure 1. USGS Map of the City Park parcel.

TOWNSHIP 55S, RANGE 39E, SECTION 19/20

USGS Maps: SOUTH MIAMI, REV. 1988
GOULDS, REV. 1994

0 750 1500 3000 Feet approx.
0 270 450 900 Meters approx.

PROJECT SETTING

The ±937-acre City Park parcel is located in southwestern Miami-Dade County, Florida, within part of Sections 19 and 20, Township 55S, Range 39E. The parcel lies approximately four miles west of the urban core of Homestead and about ten miles northeast of Everglades National Park. The property is bordered by agricultural lands, irrigation canals, and undeveloped tracts of pine rockland and wet prairie. The relevant USGS topographic quadrangle is Goulds, Fla. (Figure 1).

The region is generally flat and low-lying, with elevations ranging from approximately 6 to 10 feet above mean sea level (NGVD). Historically, this area marked the transition between the marl prairie wetlands of the eastern Everglades and the limestone-based pine rocklands that once covered much of the Miami Rock Ridge to the east (Figure 2). Vegetation in this transitional zone was historically a mosaic of sawgrass prairie, pine flatwoods, and seasonal sloughs and creeks.

The majority of the vegetative/topographic association of the area is pine rockland. The dominant plant was tall spindly southern slash pine (sometimes called Dade County pine) thinly scattered among a low-growing stunted understory of saw palmetto, cabbage palm, silver thatch palm (*Cocothrinax radiata*), prickly pear cactus (*Opuntia humifusa*), locust berry, stunted poisonwood (*Metopium toxiferum*), snowberry (*Chiococca* sp.), long-stemmed stopper (*Psidium longipes*), coontie (*Zamia floridana*), spurges, stinging nettles, and a wide array of annual and perennial wildflowers, grasses, and plants uniquely adapted to this unusual environment. This community grows on and within exposed and solutioned limestone thinly mantled by patches of soil. This soil type is called Opalocka Sand/Rock outcrop complex in the Miami-Dade County Soil Survey.

Archival aerial imagery from 1940 shows the parcel as largely undeveloped wetland prairie, with a meandering remnant creek visible in the southeastern corner (Figure 3). A pine flatwoods community was present along the southern bank of the creek. By the 1950s, aerial photographs show that the parcel had been partially cleared, ditched, and converted to agricultural use (Figure 4). By the 1980s, the parcel had been almost completely converted to intensive agriculture, consisting of row crops, groves, and irrigated fields (Figures 5-10). A CSX railroad easement crosses the parcel towards the northern end. This spur of the railroad was laid between 1957 and 1964 and is visible on the most recent aerial photographs (Figures 5,6).

The parcel is now bordered by Krome Avenue to the west, active agricultural operations to the north and south, and a residential neighborhood to the east (Figure 6). Several drainage and irrigation canals run along or across the parcel, replacing the former natural hydrologic features.

The geology of southwestern Miami-Dade County consists of thin, fine-grained sands and marl soils overlying Miami Limestone bedrock. These sediments are predominantly late Pleistocene in age, deposited as part of a complex system of marine and freshwater

environments. Soils in the area are generally hydric, poorly drained, and shallow, with bedrock often encountered within 20 to 35 centimeters below the surface.

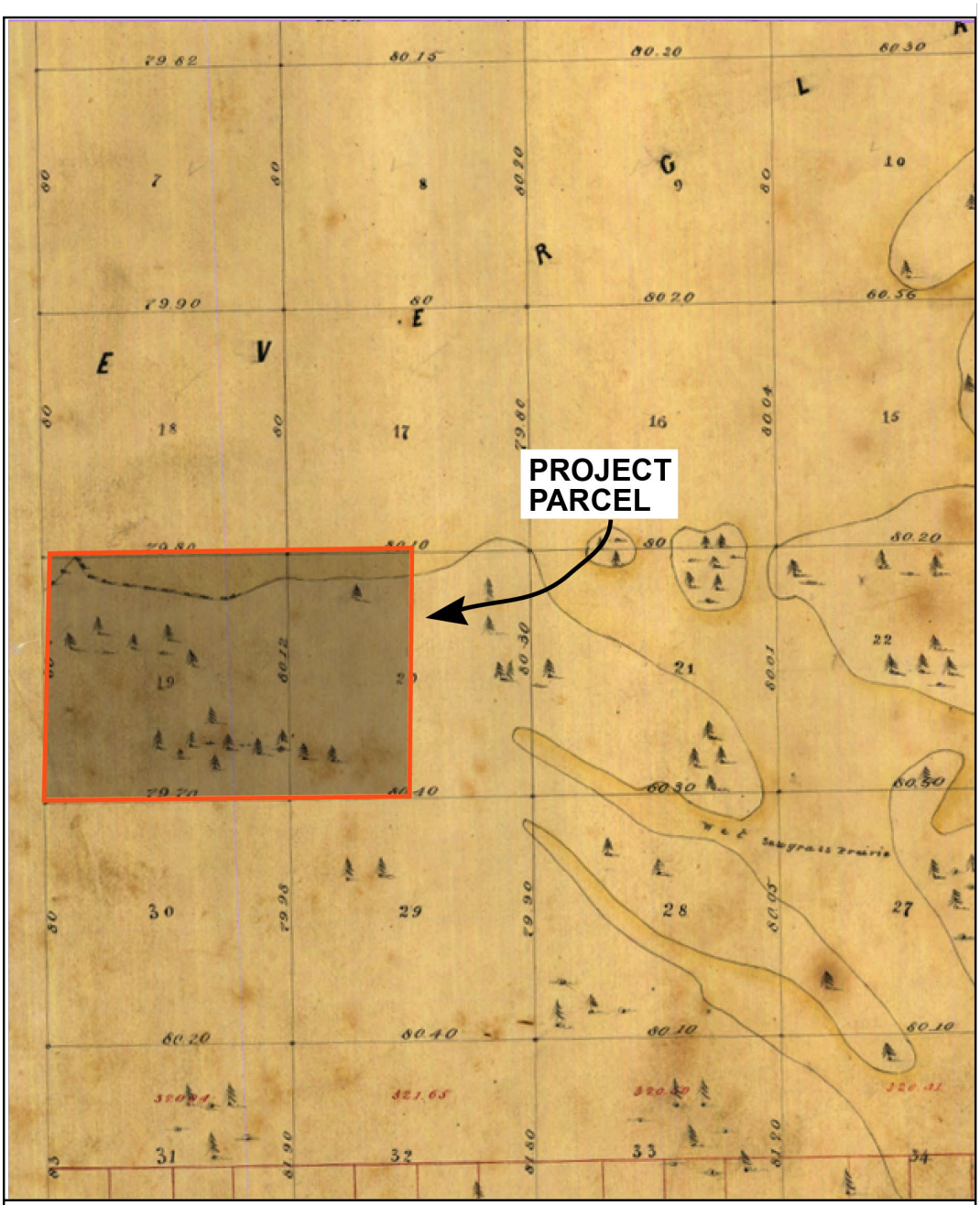

Figure 2. Portion of the 1847 plat map for Township 55S, Range 39E with the project parcel boundaries superimposed.

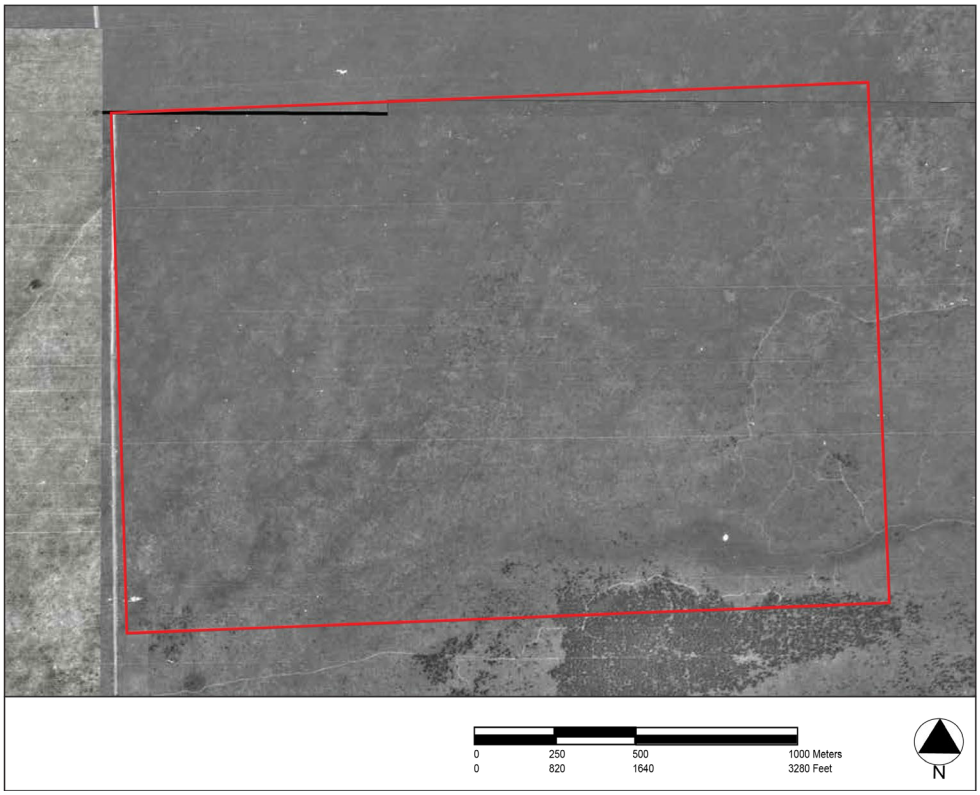

Figure 3. 1940 aerial photograph of the project parcel.

Figure 4. 1952 aerial photograph of the project parcel.

Figure 5. 1994 aerial photograph of the project parcel.

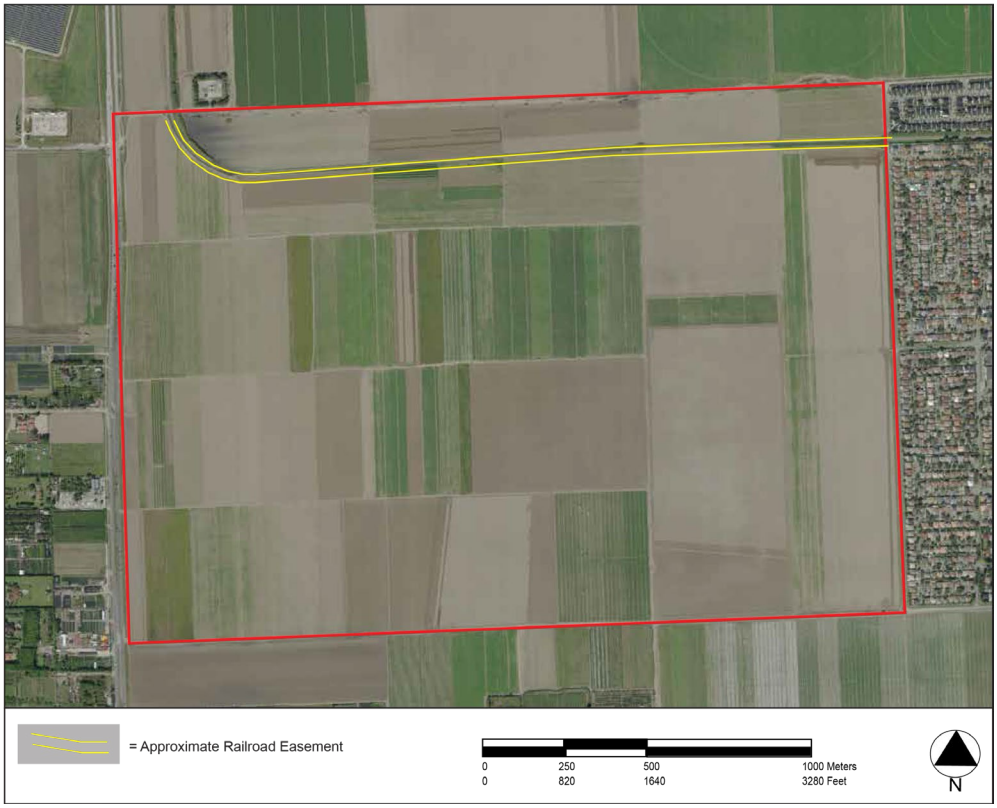

Figure 6. 2022 aerial photograph of the project parcel.

Figure 7. Southeastern corner of parcel, in okra field, looking north.

Figure 8. Northeastern corner of parcel, looking south.

Figure 9. Central parcel, taken between cucumber rows near ST31, looking north.

Figure 10. Central parcel, sunflower field, looking north.

PREVIOUS RESEARCH

In August 2005, the Archaeological and Historical Conservancy Inc. (AHC) conducted an archaeological reconnaissance survey for The Curtis Group of the Krome Groves parcel in central Miami-Dade County. The parcel was surveyed to locate any sites of archaeological and/ or historical significance. The assessment resulted in the determination that no historic or archaeological sites occur on the parcel, and that development of this parcel will have no effect on any significant cultural resources considered potentially eligible for listing on the National Register of Historic Places (Carr and Longo Survey #11704, 2005).

A search was requested on 5/19/25 with the Florida Division of Historic Resources for archives and literature associated with the project area. This included site forms and cultural resource assessment reports from the Master Site File in Tallahassee of previously recorded archaeological sites and surveys within the project parcel and within one mile of the parcel. That review determined that no previously recorded archaeological sites occur within the project or within a mile of the project (Table 1).

Table 1. Literature Review Summary

Previously Recorded Archaeological Sites:	
Within Project Parcel	0
Within One Mile of Project Parcel	0
Previous Assessments:	
Within Project Parcel	1 (AHC, Survey #11704, 2005)
Within One Mile of Project Parcel	12

A review of the state report files indicated that twelve cultural resource assessments were previously conducted within one mile of the City Park-Krome Groves project parcel (Table 2).

Table 2. Previous Cultural Resource Assessments[1]

Survey No.	Date	Author	Title	In Parcel	Out of Parcel
2127	1989	Rodriguez, Ivan, Historic Preservation Division, Metropolitan Miami-Dade County	*Dade County Historic Survey, Phase II: Final Report.*		X
8583	2001	Panamerican Consultants, inc.	*An Archaeological and Historical Survey of the Proposed El Chino Nursery Tower Location in Miami-Dade County, Florida.*		X
9318	2003	Panamerican Consultants, inc.	*An Archaeological and Historical Survey of the Proposed HJKA Tower Location in Miami-Dade County, Florida.*		X

9049	2003	McMillan Davis, Aripeka	*A Cultural Resource Survey of a Proposed Cingular Cell Tower Site in Dade County, Florida.*		X
8960	2003	Panamerican Consultants, inc.	*A Cultural resource Assessment of the KEN4 Tower Location in Miami-Dade County, Florida.*		X
12178	2004	Janus Research, Inc.	*A Cultural Resource Assessment Survey of Krome Avenue (SW 177th Avenue) from SW 136th Street (Howard Drive) to US 27/SR 25/Okeechobee Road in Miami-Dade County.*		X
12040	2004	Janus Research, Inc.	*A Cultural Resource assessment Survey of Krome Avenue(SW 177th Avenue/SR-997) from 296th Street (Avocado Drive) to SW136th Street (Howard Drive), Miami-Dade County, Florida.*		X
11704	2005	Carr, Robert S. and Longo, Victor, Archaeological and Historical Conservancy	*A reconnaissance Archaeological Survey of the Krome Groves Parcel, Miami-Dade County, Florida.*	X	
13504	2006	Janus Research, Inc.	*Cultural resource Assessment survey of Proposed Improvements to the Kendall Tamiami Executive Airport (TMB), Miami-Dade County.*		X
19317	2012	Janus Research, Inc.	*Project Development & Environmental Study, SR 997/ SW 177th Avenue/Krome Avenue from SW 296th Street to SW 136th Street FM #249614-4-22-01, EDTM #7800, Addendum to the Cultural Resource Assessment Survey (CRAS) of Krome Avenue (SW 177th Avenue/State Road 997).*		X
24600	2016	Janus Research, Inc.	*Cultural Resource Survey reevaluation and Section 106 Evaluation and Determination of Effects for State Road 997/Krome Avenue from South of SW296th Street/Avocado Drive to South of SW 232nd Street, Miami-Dade County, Florida.*		X
28391	2020	Janus Research, Inc.	*Cultural Resource Desktop Analysis and Field Review for SR 997/ Krome Avenue from SW 232nd Street to SW 185th Street (Financial Project ID (FPID) No. 43834-2-52-01 and SR 997/Krome Avenue from SW 184th Street to SW 136th Street (FPID No. 438034-3-52-01).*		X
Note: [1]Based on assessments within one mile of the project parcel.					

CULTURAL SUMMARY

The Glades area was originally defined by M.W. Stirling in 1936 as a distinctive cultural area to include all of Southern Florida. John M. Goggin defined more specific boundaries for the area and identified three inclusive sub-areas (1947). These were the Calusa sub-area in southwest Florida, the "Tekesta" sub-area for Southeast Florida and the Florida Keys, as well as the Okeechobee sub-area around Lake Okeechobee. Goggin classified these sub-areas on the basis of his recognition of their distinctive natural environments, the different tribes in those regions during historic times, and differences in the archaeological record.

A redefinition of the Glades culture area was offered using the term Everglades Area by Beriault and Carr to encompass only southeast Florida (Carr and Beriault 1984: 1-11). In 1988, Griffin concurred by using Everglades Area in his recent synthesis of South Florida archaeology. This revision confines the Everglades Area to southeastern Florida and the Florida Keys. It is difficult to determine an exact western boundary for the area, but Beriault and Carr suggest one somewhere west of the Shark River and east of Turner River, probably near the eastern boundary of Big Cypress Swamp. A northern boundary would be somewhere near the Broward-Palm Beach County line (Carr and Beriault 1984:2).

PALEO PERIOD (14,000 - 8,500 BP)

During the Late Pleistocene, the first Native Americans began moving into southeastern North America and Florida. Paleoenvironmental studies show that during this period (the terminal Wisconsian ice age) the climate was probably less extreme, with cooler summers and warmer winters. The climate was also drier, and sea levels were lower (Carbone 1983; Griffin 1988). This resulted in a broader peninsula, with much of the interior being arid and prairie-like. Reliable fresh water would have been constrained to sinkholes and springs, and populations, although largely nomadic, would have likely relied heavily on these reliable water sources (Thulman 2009).

Paleoindian sites are largely defined by the presence of a distinctive “toolkit”, including lanceolate shaped hafted bifaces, unifacial scrapers and knives. These sites are mostly surface scatters, and are largely limited to the northern part of Florida to the near exclusion of the south (Faught and Pevny 2019), but this is likely a sampling bias as indicated by the Cutler Fossil Site in Dade County (Carr 1986, 2012, 2015), and other likely undiscovered deep solution hole sites.

Several Paleo-period sites are documented from Florida, including Warm Mineral Springs and Little Salt Springs in Sarasota County (Cockrell and Murphy 1978; Clausen and Gifford 1975), Harney Flats in Hillsborough County (Daniel and Wisenbaker 1987). Most notably, the Page-Ladson site in Jefferson and Taylor Counties, evidences a pre-Clovis habitation with ages that range between 14,500 and 14,000 BP (Halligan et al. 2016). This indicates that hunter-gatherers along the Gulf Coastal Plain of Florida

coexisted with and hunted megafauna for ~2000 years before these animals became extinct (Dunbar 2006; Halligan et al. 2016).

ARCHAIC PERIOD (8,500 - 2,500 BP)

By late Paleo Indian Period the large Pleistocene animals had disappeared, the climate changed and the sea level rose. The subsequent Archaic period reflects a post-Pleistocene shift in adaptation marked by an increase in the seasonal exploitation of a broad spectrum of food resources, possibly a more restricted use of territory due to regional specialization, and more semi-sedentary habitation sites and a greater range of tool/artifact types indicating an expanding diversity of use/activities. The large lanceolate points considered diagnostic of the Paleoindian period were replaced by smaller side and corner notched varieties. No ceramics are known to exist until the Late Archaic. During the Archaic regional specializations became more marked, not only with material culture but also with distinct local utilization of local plant and animal resources.

Few Early Archaic (8500-7000 BP) sites are known from interior Florida. During the Archaic period sea levels began to rise at a fairly rapid rate, estimated at 8.3 cm. per 100 years 6000-3000 BP, and 3.5 cm per 100 years afterwards (Scholl and Stuiver 1967), although whether sea levels were steadily rising or oscillating is still unclear (see Griffin 1988, Allerton and Carr 1990 for reviews of the literature). Data is somewhat difficult to sort out as sea level rise was in places accompanied by both shore regression and transgression. Cypress swamps and hardwood sub-tropical forests had established themselves by about 5000 BP as conditions became wetter (and warmer) in the interior (Carbone 1983, Delcourt and Delcourt 1981).

By 7500 BP, the sea levels fluctuated to near present levels and the Pleistocene/Holocene transition was complete (Morse et al. 1996).

During the Middle Archaic (7000-5000 BP) there was a population expansion with settlement on the coast and near riverine systems. By about 6500 BP mesic conditions began to spread; however, despite the rise of available surface water, major modern landscape features had not formed, and population (or repopulation) was still sparse (Griffin 1988). By 5000 BP, the scrub oak/prairie vegetation of post-Pleistocene Florida had given way to extensive stands of longleaf pine, cypress swamps, and bayheads (Delcourt and Delcourt 1987).

The Windover Site, 8BR246, a mortuary pond near Titusville in Brevard County, yielded well-preserved human remains and grave goods, including woven fabric, wood, ornaments, and other perishable cultural material. The site, which was investigated from 1984 through 1997 by Glen H. Doran and others from Florida State University has expanded knowledge and appreciation of the cultural level and technological achievements of middle Archaic Florida peoples (Doran et al. 2002).

The Late Archaic Period (5000-2500 BP) is distinguished by the development of fiber-tempered pottery. This is often used as a marker of the Orange Phase, commencing

at about 4000 BP, either coinciding with or soon after the development of the extensive freshwater shell middens. The Late Archaic Orange Phase subsistence strategy appears to have intensified the use of shellfish and marine resources near the coast, rivers, or lakes as well as being marked by an accelerated trend toward regional specializations. Milanich and Fairbanks noted a seasonality of land use indicated by occupation of lowland villages near water sources from fall to spring with dispersal for upland hunting in the summer (Milanich and Fairbanks 1980).

Sites from the Late Archaic Period are becoming increasingly evident in southeast Florida. Sites dating from as early as 4000 years ago have been located along Biscayne Bay (Carr 1981b), but Late Archaic horizons appear to be commonplace on Everglades sites. Radiocarbon dates in the Everglades indicate early ages of 3050 years ago, +/- 140 years for the Peace Camp site (Mowers and Williams 1972: 18), and 4840 years ago +/- 210 years for Taylor's Head (8BD73) (Masson et al. 1988:346). Partial fiber and sand tempered pottery has been recovered from interior sites such as the Honey Hill site (8DA411) and the 202nd Street site in northern Dade County.

FORMATIVE STAGE OR GLADES PERIODS (2,500 BP - 500 BP)

The Formative Stage (beginning about 2500 BP) is divided in south Florida into the Glades Periods sequence. Subsistence adaptation is marked by a narrowing spectrum of resource use, as well as continued trends toward regional diversity and ecological specializations, marked in part by the proliferation of inland resource extraction sites.

The Formative or Glades adaptation (Goggin ND) based on hunting, fishing, and the harvesting of shellfish and plants, was similar to the Archaic, but was characterized by increasing specializations in gathering strategies and tool-making. Earlier scholars have typed this hunter-gatherer society as primitive or “low-level” (Kroeber 1939). However, there is evidence of specialization of tools, creation of artistic effigies and masks such as the beautifully-executed wood carvings from Key Marco in Collier County and those from Fort Center near Lake Okeechobee (Cushing 1897; Sears 1982), and based on historic accounts of the Calusa hegemony, that the south Florida area had an advanced culture that Goggin (1964) has called a “stratified non-agrarian society.”

Formative Period cultural evolution eventually led to increased political sophistication, culminating in broad regional political alliances and regulation and trade of materials and goods (i.e. resources) between the coast and inland areas (Milanich and Fairbanks 1980). By protohistoric and contact times the Calusa were the dominant tribal group, gaining broad political influence and at least partial control over much of south Florida and as far north as central Brevard County. Historically, the main Calusa village has been identified as “Calos” on Mound Key in Estero Bay in Lee County (Wheeler 2000), although 50 to 70 large villages were under direct Calusa control by contact times (Griffin 1988).

During the Formative Periods, village sites grew to the proportions of large multi-use complexes, particularly along the coast and barrier islands of southwest Florida. Some of the projected intra-site features of these complex shellworks were temple mounds, canals,

causeways, platform mounds, burial mounds, courtyards and watercourts. Research involving the excavating of large contiguous areas of these shell mound complexes is establishing demonstrable uses for the features of these large sites, upon which heretofore were merely speculated (Widmer 1988, 1996).

Tidal estuary rivers and inland hammocks along deep-water sloughs, marshes, and permanent ponds were seasonally visited for extraction of natural resources, and are now marked by small to relatively large black dirt middens, some of which may have been semi-permanent villages. The pine and cypress flatwoods appear to have supported few sites, although areas around Lake Trafford and other interior areas supported substantial sites, including sand mounds, and may be more similar to the Okeechobee cultural area than to the coastal cultures.

The Glades cultural tradition included decorated ceramics. Although they are a minority in the archaeological record; the majority of recovered (rim) sherds are plainware. However, despite this, pottery types are used as the major temporal marker(s) for determining site chronology. Changes in pottery do not represent mere changes in artistic motifs, but reflect inter- and intra-regional trade contacts and outside cultural influences (possibly through exogamy, shifting of populations, and even the through evolution of a culture through time). Whatever the influences, the Glades tradition is continuous from Late-Archaic times to contact times.

Even though exogamy is likely to have been practiced, traders or other specialists probably moved between major cultural areas in small numbers, and genetic flow probably accompanied cultural exchange, although perhaps not on the same scale. This may have increased in later times due to use of traditional obligations of kinship and intermarriage to stabilize alliances that were not codified into a formal legal system.

The following table has been modified from several sources, but it is predominantly based on Milanich and Fairbanks (1980), Griffin (1988), and Carr and Beriault (1984). Dates have been rounded somewhat and translated to Before Present (BP). There are some differences of opinion in the dates, particularly about the timing of the Glades Ia and Ib division.

Table 3: Glades Cultural Sequence

Glades Ia (2500 BP - 1500 BP)	First appearance of sand tempered plain pottery, but little else to mark a difference and the preceding Late Archaic. Sand tempered plain remains a predominate type throughout the Glades sequence. Non-local types include St. Johns Plain and Deptford Stamped pottery.
Glades Ib (1500 BP - 1250 BP)	First appearance of decorated sand-tempered ceramic (Ft. Drum Incised, Ft. Drum Punctated, Cane Patch Incised, Turner River Punctate),

	plainware common. Pottery rim grooving and incision decorations become widespread. Mound construction begins.
Glades IIa (1250 BP - 1100 BP)	First appearance of Gordon's Pass Incised, Sanibel Incised, Miami Incised, and plainware is common. Distinction between ceramics of southeast and southwest Florida becomes apparent. Ten Thousand Island area is distinct from Caloosahatchee area and Tequesta area. Increased social stratification. Population size may have approximated that at contact period.
Glades IIb (1100 - 1000 BP)	First appearance of Matecumbe Incised; Key Largo Incised common on east coast, Gordon's Pass Incised common on the west, and plainware common throughout.
Glades IIc (1000 BP - 800 BP)	First appearance of Plantation Pinched, but few decorated wares with a preponderance of plainware (there is some evidence of population reduction-perhaps due to a cataclysmic event). Non-local pottery (*e.g.* St. Johns Check Stamped, Belle Glade Plain) appears.
Glades IIIa (800 - 600 BP)	First appearance of Surfside Incised, increasing quantities of St. Johns pottery (especially on East Coast), and Belle Glade pottery.
Glades IIIb (600 BP - 500 BP)	Glades Tooled rims appear, zoned punctate designs, but general decline in incised decoration. Belle Glade ceramics common on west coast. St. Johns ware present but rare on West Coast, common on East Coast.
Glades IIIc (500 BP - 300 BP)	Continuation of IIIb ceramics, with pronounced flaring of rims and embossing on Glades Tooled ceramics. Mound burial construction less common with intrusive burials into existing mounds, appearance of European goods, plainware common.

HISTORIC PERIOD

When the Europeans arrived in the sixteenth century they encountered a thriving indigenous population with at least five separate tribes in southern Florida: the Tequesta

in southeast Florida, the Calusa in southwest Florida, the Jeaga and Ais along the east coast north of the Tequesta, and the Mayaimi near Lake Okeechobee. At the time of Spanish contact the Calusa maintained political dominance over these other tribes. It has been estimated that there were about 20,000 Indians in south Florida when the Spanish arrived (Milanich and Fairbanks, 1980). By 1763, when the English gained control of Florida, that population had been reduced to several hundred. These last survivors were reported to have migrated to Cuba with the Spanish (Romans 1962), however, it is likely that the so-called "Spanish Indians" (Sturtevant 1953), who raided Indian Key in 1840, were the mixed-blood descendants of the Calusa and/or refugees from north Florida missions raided by the English in the early eighteenth century. The Spanish Indians joined the Seminoles, who had fled en masse into south Florida in 1838 after the Battle of Okeechobee, although some Creek groups apparently had migrated to south Florida earlier in the century.

The earliest documentary evidence of Seminole settlement in South Florida is an account by John Lee Williams (1837) describing Snake Warrior's Island at the headwaters of Snake Creek. This site was recently identified as likely being BD1867 in Miramar in southern Broward County.

The Seminole Indian Wars caused an increase of public awareness about the nature of the Everglades. In 1847, Buckingham Smith was sent by the Secretary of the Treasury to secure “authentic information in relation to what are called the ‘Ever Glade’ on the peninsula of Florida,” for the purpose of determining the expediency of drainage and reclamation of these wetlands for agriculture and settlements. In 1850, the federal government, under the Federal Swamp and Overflow Lands Act, deeded about twenty million acres of wetlands to the State of Florida to help promote drainage. In 1855, Florida’s first official state agency, the Internal Improvement Trust Fund was created to administer the Act. There was limited success by the agency in draining parts of South Florida through privately financed project such as those of Hamilton Disston, but it was not until Napoleon Bonaparte Broward was elected governor in 1904 that the drainage of the Everglades began to fully crystallize. He initiated studies and surveys toward this goal and soon followed those actions with the initiation of dredging of canals from Lake Okeechobee to the Atlantic Ocean. The channelization of the New River’s most westerly portions of the South Fork into the South New River Canal and North New River Canal began in 1906 followed by the dredging of the Miami River Canal. Dredging and filling of the Miami River began when Miami began to develop as a city after the arrival of the Florida East Coast Railway in 1896. The rapids on the South Fork of the river were destroyed in 1908 followed by the digging of the Miami Canal from 1909 to 1912 which bypassed the rapids at the head of the North Fork.

By the 1920s, major dredging projects, including the Tamiami Canal, and the construction of the Tamiami Trail (1920–1928), permanently altered the hydrology of the southern Everglades. These projects were intended to make South Florida suitable for farming and real estate development, and they encouraged the establishment of agricultural settlements in previously inaccessible wetlands.

In Miami-Dade County, areas along the former margins of the Everglades were rapidly converted for agricultural production, particularly after World War II. By the 1960s, the area had been ditched, drained, and cleared, and it began to support a mix of row crops, citrus groves, and other irrigated agriculture.

Throughout the late 20th century, South Florida's increasing population growth placed pressure on surrounding rural and agricultural lands. Although much of the urban expansion focused on the eastern portion of Miami-Dade County, the area surrounding the City Park parcel remained largely agricultural, with extensive canal networks and water control infrastructure managed by local water control districts and the South Florida Water Management District (SFWMD).

METHODOLOGY

Prior to conducting fieldwork within the project parcel, relevant archival and background resources were reviewed. This included, but was not limited to, previous archaeological reports for sites in Miami-Dade County, data from the Florida Master Site File in Tallahassee, and examination of USGS topographic maps covering the project area. Additionally, both black-and-white and color aerial photographs from various decades were analyzed to identify anthropogenic alterations to topography, hydrology, and vegetation patterns.

RESEARCH DESIGN

The principal project objective was to locate and assess all cultural resources on the parcel. This survey incorporated the use of certain predictive archaeological site models based on topographic and vegetative attributes that are associated with prehistoric and historic sites in the eastern Everglades of Miami-Dade County. These models postulate that tree island formations adjacent to historic seasonal ponds and wetlands are medium to high probability areas for archaeological sites. The elevational information on the USGS quadrangle map for the area also was used.

The City Park parcel is historically a broad wetland prairie with little elevational variation and no known upland hammocks. Based on this, the majority of the parcel was considered to be a low probability zone (LPZ) for archaeological sites. However, the historically forested southern edge of remnant creek was considered to be a medium probability zone (MPZ).

FIELDWORK

Within the low probability zone, systematic shovel testing was conducted at 100-meter intervals along north–south transects spaced 400 meters apart. This resulted in a 25% sample of the LPZ. In the medium probability zones, shovel tests were placed at 50-meter intervals to provide increased coverage. Additional judgmental tests were excavated in areas of slight elevation or along the remnant creek course, based on field observations.

All shovel tests measured approximately 50 cm in diameter and were excavated as deep as possible until culturally sterile subsoil or bedrock was encountered. Sediments were screened through ¼-inch mesh hardware cloth, and all cultural materials, had any been present, would have been collected for analysis. Shovel test forms were completed for each unit, and a handheld GPS unit was used to record the coordinates of all shovel test locations.

COLLECTIONS

No cultural materials were collected during this assessment.

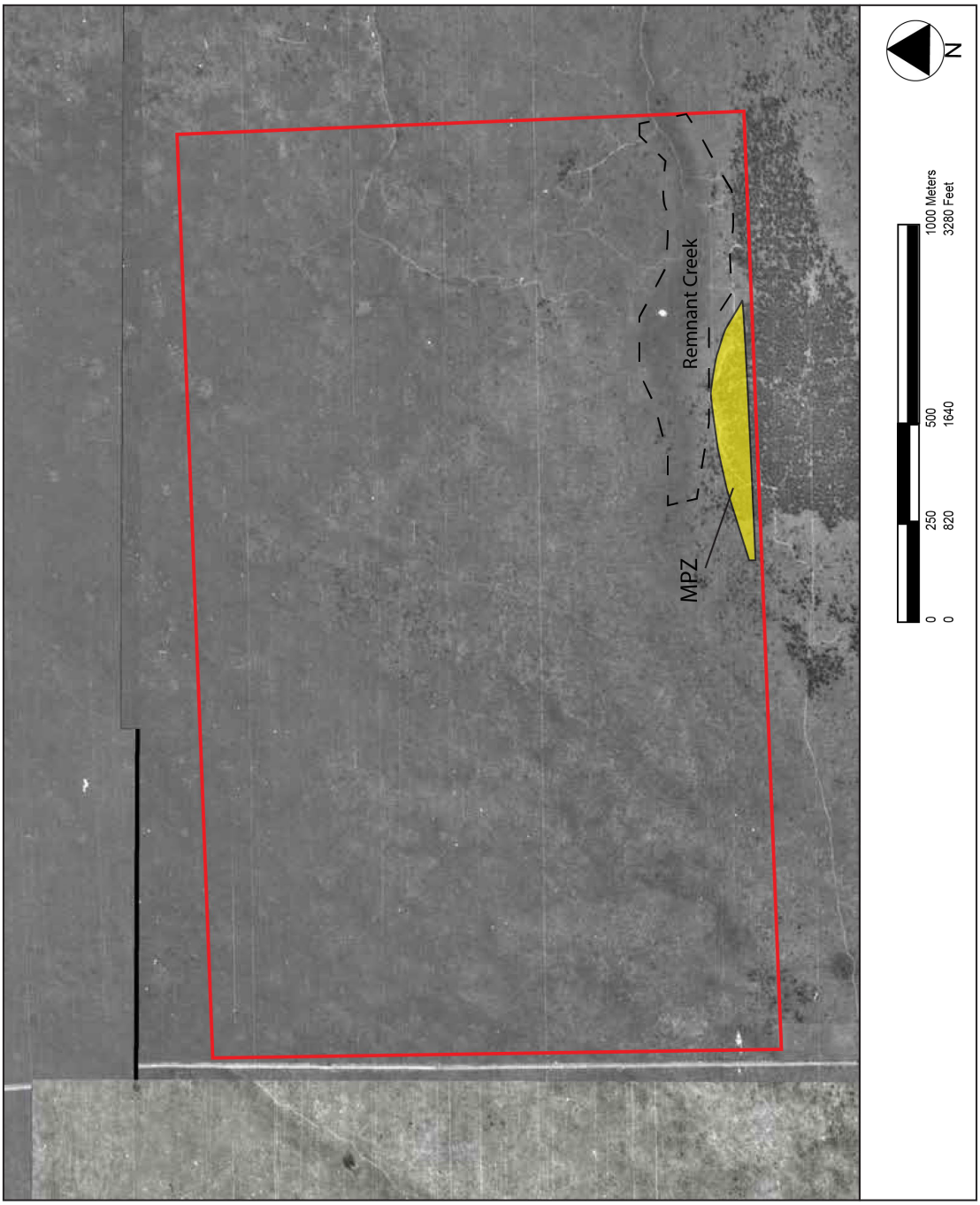

Figure 11. 1940 aerial photograph showing remnant creek and identified medium probability zone.

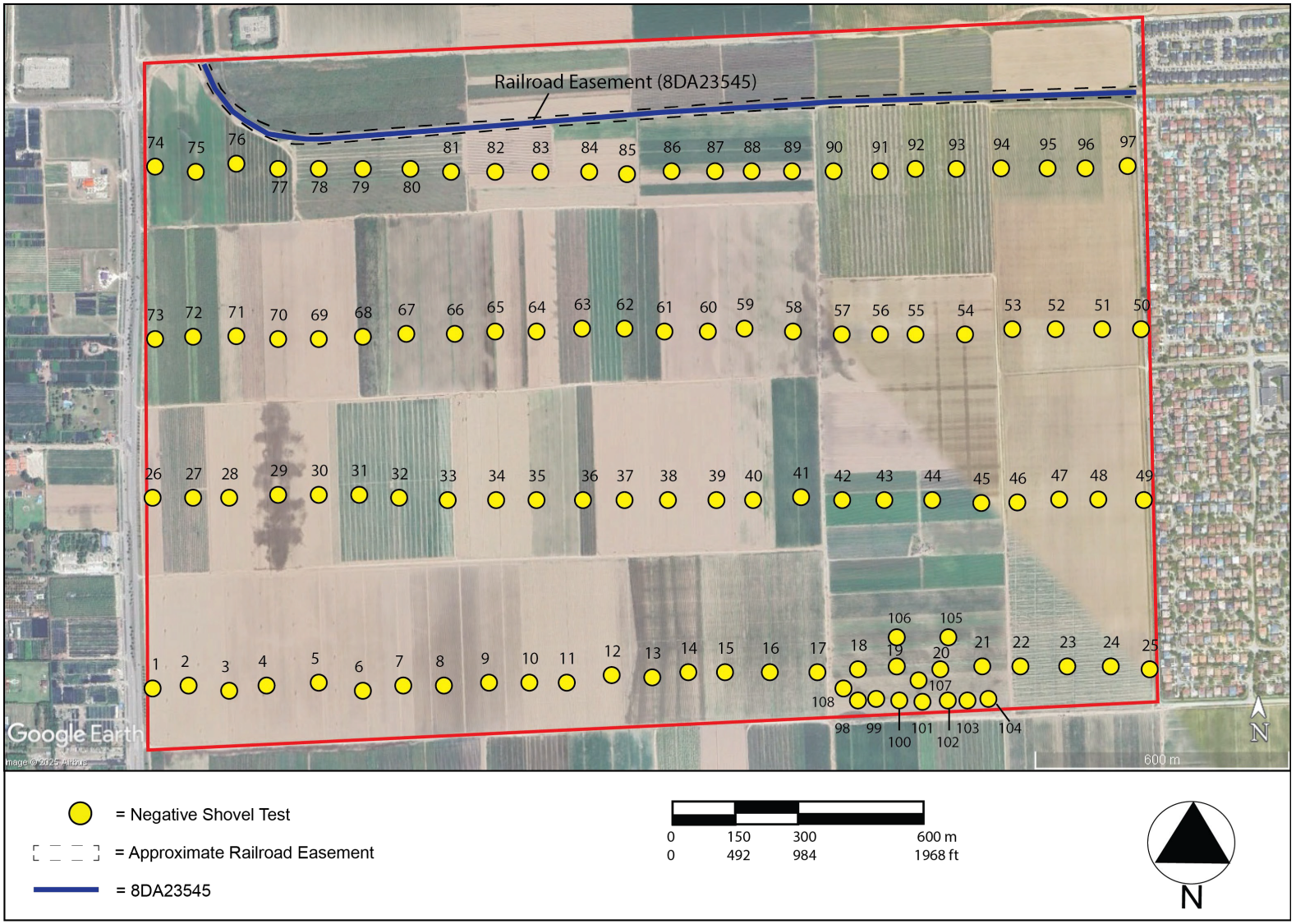

Figure 12. 2022 aerial photograph showing shovel test locations.

RESULTS AND RECOMMENDATIONS

In August 2025, the Archaeological and Historical Conservancy, Inc. (AHC) conducted a Phase I Cultural Resource Assessment Survey (CRAS) of the ±937-acre City Park parcel, located in southwestern Miami-Dade County, Florida. A review of archival records determined that no previously recorded prehistoric or historic sites occur within the project parcel boundaries. No archaeological sites or resources were identified as a result of this assessment.

Historically, the parcel was part of a broad, pine rockland and homogenous wetland prairie. Early aerial photographs show a remnant creek in the southeastern corner of the property (Figure 3), and an emerging pine flatwood forest was also visible along the creek's southern bank. Subsequent agricultural activities have eliminated all visible evidence of these natural features, and the parcel is now entirely under agricultural use.

Based on landform characteristics, the majority of the parcel was assessed as having a low overall probability for archaeological sites. One exception is the area corresponding to the former pine flatwoods along the southern edge of the remnant creek, which was tested as a medium probability zone (MPZ; Figure 11).

A total of 108 shovel tests were excavated across the project parcel (Figure 12). Of these, 97 were placed systematically at 100-meter intervals along transects spaced 400 meters apart in the low probability zone (LPZ). An additional 7 were dug systematically within the MPZ, and 4 were dug judgmentally near the remnant creek and floodplain.

Shovel testing revealed a consistent and relatively shallow stratigraphy across the parcel. Most of the parcel exhibited a disturbed grayish brown (10YR 5/2) fine loamy sand extending from the surface to between 20 and 35 cm below surface (cmbs), overlying limestone bedrock. Where small solution holes were encountered they were filled with natural and culturally sterile brown (10YR 5/3) fine sand (Figure 13). No cultural materials were observed or collected during testing.

The segment of a spur of one historic linear resource, the CSX Railroad, occurs within a separate railroad easement crossing the project parcel. The resource is a single, standard gauge railroad track on gravel ballast that enters the parcel from the north, 500 feet east of its northwest corner, curves eastward 600 feet south of the parcel's northern border and crosses the parcel due east, exiting it 600 feet south of its northeast corner. The segment crossing the parcel terminates northward at a sand mine. Eastward, it joins a north/south line that terminates in Homestead and Florida City. The Homestead extension has been abandoned (Kurt 2019) but the tracks north of approximately the Gold Coast Museum, including the spur that crosses the project parcel, are functioning freight lines (Figure 14).

Figure 13. Representative shovel tests showing greyish brown (10YR 5/2) sand over high bedrock.

The CSX was created in 1980, absorbing the Seaboard Coast Line which in turn (1967) had absorbed the historic Seaboard Air Line Railroad, founded in the 1880s. The segment of the railroad crossing the project parcel was laid between 1957 and 1964. It is newly recorded as 8DA23545, in accordance with FDHR requirements (Figure 12).

It is the consultant's opinion, based on all available data, that no historic properties eligible for listing in the NRHP occur within the project parcel. Linear resource, 8DA23545, occurs in a railroad easement that crosses the parcel, and there is insufficient information to determine whether the segment meets eligibility criteria for listing in the NRHP.

Should future development reveal unanticipated archaeological materials, appropriate steps should be taken to protect and document these resources. In the event that human remains are encountered, all work must cease and the provisions of Chapter 872.05, Florida Statutes, will apply.

Figure 14. CSX railroad spur crossing the project parcel, looking west (left) looking north with freight train on tracks (right).

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APPENDIX I: FLORIDA SURVEY LOG

Ent D (FMSF only) _____

Survey Log Sheet

Florida Master Site File
Version 5.0 3/19

Survey # (FMSF only) _____

Consult *Guide to the Survey Log Sheet* for detailed instructions.

Manuscript Information

Survey Project (name and project phase)

Report Title (exactly as on title page)

Report Authors (as on title page) 1._____ 3. _____
2._____ 4. _____

Publication Year _____ **N**umber of Pages in Report (do not include site forms) _____

Publication Information (Give series, number in series, publisher and city. For article or chapter, cite page numbers. Use the style of *American Antiquity*.)

Supervisors of Fieldwork (even if same as author) Names _____

Affiliation of Fieldworkers: Organization _____ City _____

Key Words/Phrases (Don't use county name, or common words like *archaeology*, *structure*, *survey, architecture, etc.*)

1. _____ 3._____ 5. _____ 7._____
2. _____ 4._____ 6. _____ 8._____

Survey Sponsors (corporation, government unit, organization, or person funding fieldwork)

Name _____ Organization _____

Address/Phone/E-mail _____

Recorder of Log Sheet _____ Date Log Sheet Completed _____

Is this survey or project a continuation of a previous project? No Yes: **P**revious survey #s (FMSF only) _____

Project Area Mapping

Counties (select every county in which field survey was done; attach additional sheet if necessary)

1. _____ 3. _____ 5. _____
2. _____ 4. _____ 6. _____

USGS 1:24,000 Map Names/Year of Latest Revision (attach additional sheet if necessary)

1. Name _____ Year_____ 4. Name _____ Year_____
2. Name _____ Year_____ 5. Name _____ Year_____
3. Name _____ Year_____ 6. Name _____ Year_____

Field Dates and Project Area Description

Fieldwork Dates: Start _____ End _____ **T**otal Area Surveyed (fill in one) _____hectares _____acres

Number of Distinct Tracts or Areas Surveyed _____

If Corridor (fill in one for each) **W**idth: _____meters _____feet **L**ength: _____kilometers _____miles

Florida Master Site File / Div. of Historical Resources / R.A. Gray Bldg / 500 S Bronough St., Tallahassee, Florida 32399-0250
Phone 850.245.6440, Fax 850.245.6439, Email: SiteFile@dos.myflorida.com

Survey Log Sheet

Survey #_____

Research and Field Methods

Types of Survey (select all that apply): archaeological architectural historical/archival underwater
damage assessment monitoring report other(describe): _____

Scope/Intensity/Procedures

Preliminary Methods (select as many as apply to the project as a whole)

Florida Archives (Gray Building)	library research- *local public*	local property or tax records	other historic maps	LIDAR
Florida Photo Archives (Gray Building)	library-special collection	newspaper files	soils maps or data	other remote sensing
Site File property search	Public Lands Survey (maps at DEP)	literature search	windshield survey	
Site File survey search	local informant(s)	Sanborn Insurance maps	aerial photography	

other (describe): _____

Archaeological Methods (select as many as apply to the project as a whole)

Check here if **NO** archaeological methods were used.

surface collection, controlled	shovel test-other screen size	block excavation (at least 2x2 m)	metal detector
surface collection, **un**controlled	water screen	soil resistivity	other remote sensing
shovel test-1/4"screen	posthole tests	magnetometer	pedestrian survey
shovel test-1/8" screen	auger tests	side scan sonar	unknown
shovel test 1/16"screen	coring	ground penetrating radar (GPR)	
shovel test-unscreened	test excavation (at least 1x2 m)	LIDAR	

other (describe): _____

Historical/Architectural Methods (select as many as apply to the project as a whole)

Check here if **NO** historical/architectural methods were used.

building permits	demolition permits	neighbor interview	subdivision maps
commercial permits	windshield survey	occupant interview	tax records
interior documentation	local property records	occupation permits	unknown

other (describe): _____

Survey Results

Resource Significance Evaluated? Yes No

Count of Previously Recorded Resources_____ **C**ount of Newly Recorded Resources_____

List Previously Recorded Site ID#s with Site File Forms Completed (attach additional pages if necessary)

List Newly Recorded Site ID#s (attach additional pages if necessary)

Site Forms Used: Site File Paper Forms Site File PDF Forms

REQUIRED: Attach Map of Survey or Project Area Boundary

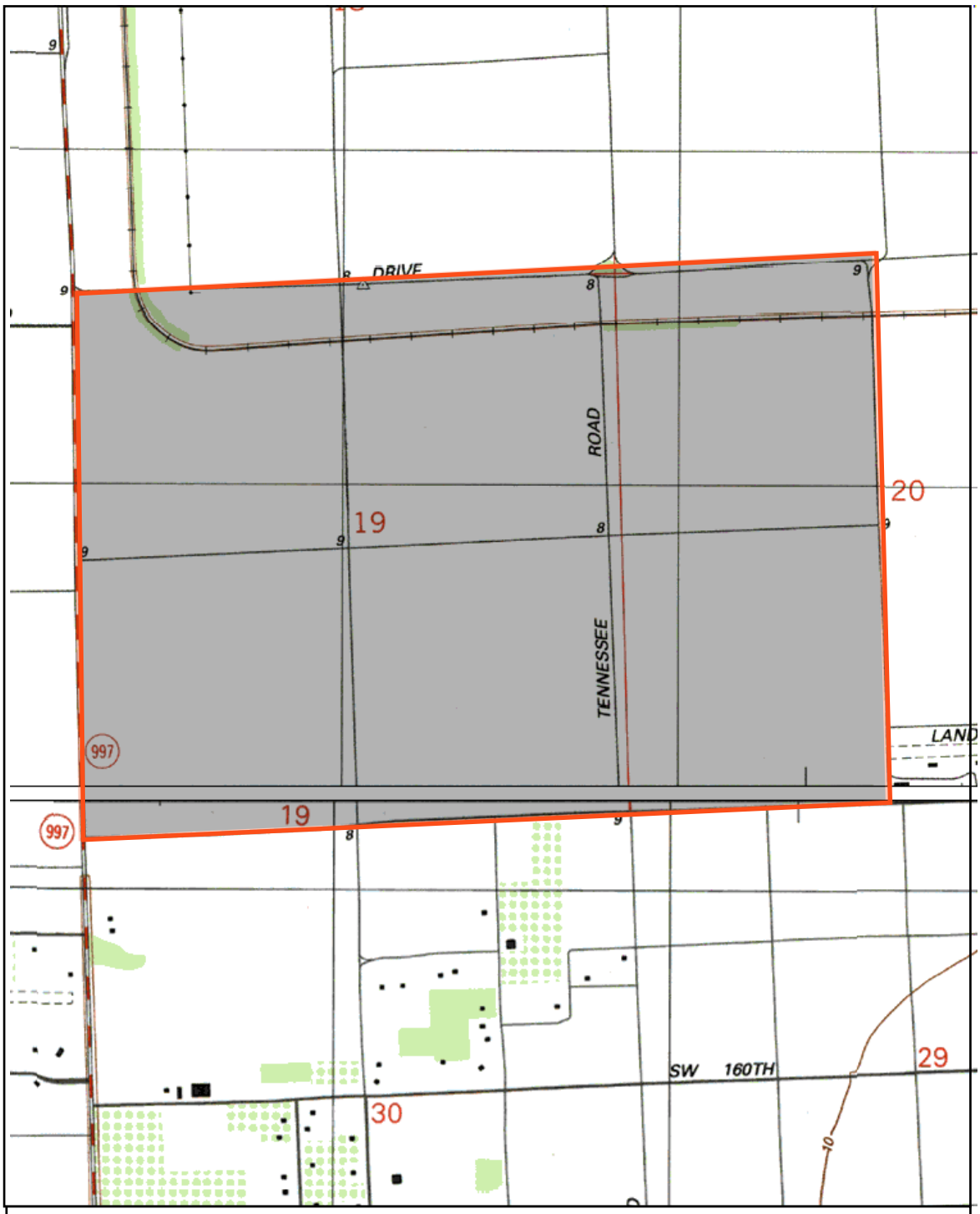
SHPO USE ONLY	SHPO USE ONLY	SHPO USE ONLY

Origin of Report: 872 Public Lands UW 1A32 #_____ Academic Contract Avocational
Grant Project #_____ Compliance Review: CRAT #_____

Type of Document: Archaeological Survey Historical/Architectural Survey Marine Survey Cell Tower CRAS Monitoring Report
Overview Excavation Report Multi-Site Excavation Report Structure Detailed Report Library, Hist. or Archival Doc
Desktop Analysis MPS MRA TG Other: _____

Document Destination: _____ **P**lotability: _____

Florida Master Site File / Div. of Historical Resources / R.A. Gray Bldg / 500 S Bronough St., Tallahassee, Florida 32399-0250
Phone 850.245.6440, Fax 850.245.6439, Email: SiteFile@dos.myflorida.com



USGS Map of the City Park parcel.

N

TOWNSHIP 55S, RANGE 39E, SECTION 19/20

USGS Maps: SOUTH MIAMI, REV. 1988
GOULDS, REV. 1994

0	750	1500	3000 Feet approx.
0	270	450	900 Meters approx.

APPENDIX II: FLORIDA SITE FORM – 8DA23545

Original
Update

RESOURCE GROUP FORM
FLORIDA MASTER SITE FILE
Version 5.0 3/19

Consult the *Guide to the Resource Group Form* for additional instructions

Site #8 _____
Field Date_____
Form Date _____
Recorder# _____

NOTE: Use this form to document districts, landscapes, building complexes and linear resources as described in the box below. Cultural resources contributing to the Resource Group should also be documented individually at the Site File. **Do not use this form for National Register multiple property submissions** (MPSs). National Register MPSs are treated as Site File manuscripts and are associated with the individual resources included under the MPS cover using the Site File manuscript number.

Check ONE box that best describes the Resource Group:

- ☐ **Historic district** (NR category "district"): buildings and NR structures only: NO archaeological sites
- ☐ **Archaeological district** (NR category "district"): archaeological sites only: NO buildings or NR structures
- ☐ **Mixed district** (NR category "district"): includes more than one type of cultural resource (example: archaeological sites and buildings)
- ☐ **Building complex** (NR category usually "building(s)"): multiple buildings in close spatial and functional association
- ☐ **Designed historic landscape** (NR category usually "district" or "site"): can include multiple resources (see *National Register Bulletin #18*, page 2 for more detailed definition and examples: e.g. parks, golf courses, campuses, resorts, etc.)
- ☐ **Rural historic landscape** (NR category usually "district" or "site"): can include multiple resources and resources not formally designed (see *National Register Bulletin #30, Guidelines for Evaluating and Documenting Rural Historic Landscapes* for more detailed definition and examples: e.g. farmsteads, fish camps, lumber camps, traditional ceremonial sites, etc.)
- ☐ **Linear resource** (NR category usually "structure"): Linear resources are a special type of structure or historic landscape and can include canals, railways, roads, etc.

Resource Group Name_____ **M**ultiple Listing [DHR only] _____
Project Name _____ **F**MSF Survey #_____
National Register Category (please check one): building(s) structure district site object
Linear Resource Type (if applicable): canal railway road other (describe): _____
Ownership: private-profit private-nonprofit private-individual private-nonspecific city county state federal Native American foreign unknown

LOCATION & MAPPING

	Street Number	Direction	Street Name	Street Type	Suffix Direction
Address:					

City/Town (within 3 miles) _____ In Current City Limits? yes no unknown
County or Counties (do not abbreviate) _____
Name of Public Tract (e.g., park)_____
1) **T**ownship _____ **R**ange _____ **S**ection _____ ¼ section: NW SW SE NE Irregular-name: _____
2) **T**ownship _____ **R**ange _____ **S**ection _____ ¼ section: NW SW SE NE
3) **T**ownship _____ **R**ange _____ **S**ection _____ ¼ section: NW SW SE NE
4) **T**ownship _____ **R**ange _____ **S**ection _____ ¼ section: NW SW SE NE
USGS 7.5' Map(s) 1) Name _____ **U**SGS Date _____
2) Name _____ **U**SGS Date _____
Plat, Aerial, or Other Map (map's name, originating office with location) _____
Landgrant _____
Verbal Description of Boundaries (description does not replace required map)

DHR USE ONLY	OFFICIAL EVALUATION	DHR USE ONLY
NR List Date _____ ☐ Owner Objection	SHPO – Appears to meet criteria for NR listing: ☐yes ☐no ☐insufficient info Date _____ Init._____ KEEPER – Determined eligible: ☐yes ☐no Date _____ NR Criteria for Evaluation: ☐a ☐b ☐c ☐d (see *National Register Bulletin 15*, p. 2)	

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Phone **850.245.6440** / Fax **850.245.6439** / E-mail **SiteFile@dos.myflorida.com**

RESOURCE GROUP FORM

Site #8_____

HISTORY & DESCRIPTION

Construction Year: _____ approximately year listed or earlier year listed or later
Architect/Designer: _____ **B**uilder:_____
Total number of individual resources included in this Resource Group: # of contributing _____# of non-contributing _____
Time period(s) of significance (choose a period from the list or type in date range(s), e.g. *1895-1925*)
1. _____ 3. _____
2. _____ 4. _____
Narrative Description (*National Register Bulletin 16A* pp. 33-34; attach supplementary sheets if needed)

RESEARCH METHODS (check all that apply)

FMSF record search (sites/surveys)	library research	building permits	Sanborn maps
FL State Archives/photo collection	city directory	occupant/owner interview	plat maps
property appraiser / tax records	newspaper files	neighbor interview	Public Lands Survey (DEP)
cultural resource survey	historic photos	interior inspection	HABS/HAER record search

other methods (specify) _____
Bibliographic References (give FMSF Manuscript # if relevant)

OPINION OF RESOURCE SIGNIFICANCE

Potentially eligible individually for National Register of Historic Places? yes no insufficient information
Potentially eligible as contributor to a National Register district? yes no insufficient information
Explanation of Evaluation (required, see *National Register Bulletin 16A* p. 48-49. Attach longer statement, if needed, on separate sheet.)

Area(s) of Historical Significance (see *National Register Bulletin 15*, p. 8 for categories: e.g. "architecture", "ethnic heritage", "community planning & development", etc.)
1._____ 3._____ 5. _____
2._____ 4._____ 6. _____

DOCUMENTATION

Accessible Documentation Not Filed with the Site File - including field notes, analysis notes, photos, plans and other important documents

1) **D**ocument type _____ **M**aintaining organization _____
Document description _____ **F**ile or accession #'s _____

2) **D**ocument type _____ **M**aintaining organization _____
Document description _____ **F**ile or accession #'s _____

RECORDER INFORMATION

Recorder Name _____ Affiliation_____
Recorder Contact Information _____
(address / phone / fax / e-mail)

Required Attachments

❶ **PHOTOCOPY OF USGS 7.5' MAP WITH DISTRICT BOUNDARY CLEARLY MARKED**

❷ **LARGE SCALE STREET, PLAT OR PARCEL MAP WITH RESOURCES MAPPED & LABELED**

❸ **TABULATION OF ALL INCLUDED RESOURCES -** Include name, FMSF #, contributing? Y/N, resource category, street address or other location information if no address.

❹ **PHOTOS OF GENERAL STREETSCAPE OR VIEWS (Optional: aerial photos, views of typical resources)** When submitting images, they must be included in digital AND hard copy format (plain paper grayscale acceptable). Digital images must be at least 1600 x 1200 pixels, 24-bit color, jpeg or tiff.

NARRATIVE

The segment of one historic linear resource, the CSX Railroad, West Kendall Spur (newly recorded as 8DA23545) occurs on a CSX easement that traverses the project parcel. The resource is a single, standard gauge railroad track on gravel ballast that enters the parcel from the north, 500 feet east of its northwest corner, curves eastward 600 feet south of the parcel's northern border and crosses the parcel due east, exiting it 600 feet south of its northeast corner. Northward, the spur terminates at a rock quarry/distribution facility (Conrad Yelvington Miami Aggregate Terminal) dating to 1957. Eastward, it joins the 32-mile-long CSX Homestead extension which runs diagonally southwest from Bird Road near SW 72nd Street to SW 240th Street in Redland where it bends south to Homestead and Florida City. From approximately the Gold Coast Railroad Museum (at about SW 168 Street) southward, the tracks had fallen into disuse and were filed for abandonment in 2019 (Mark777 2025). Northward, the extension north of the museum and the subject spur, 8DA23545, are functioning lines.

8DA23545 traversing the project parcel, looking west.

EVALUATION

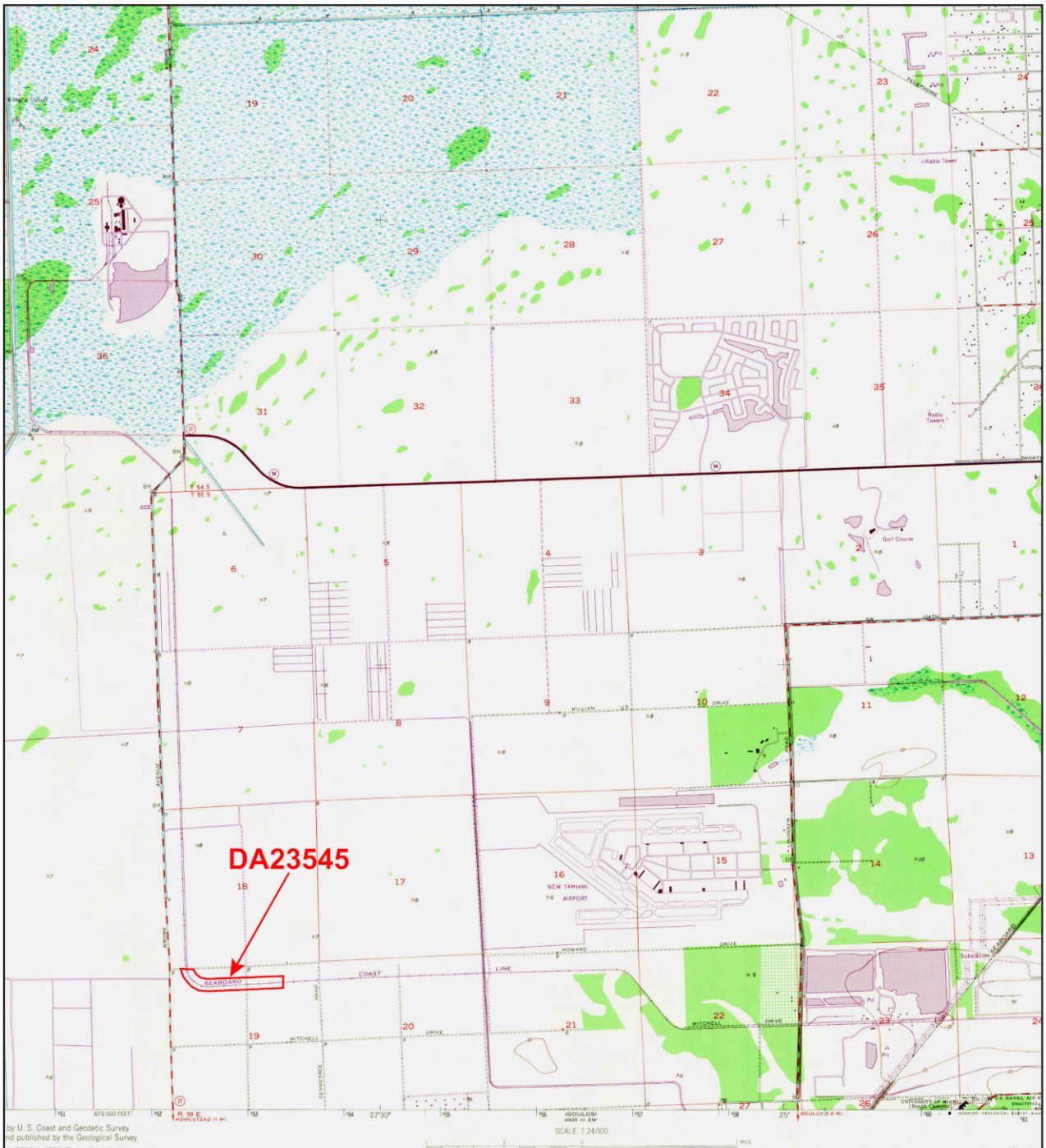
The Seaboard Air Line Railroad was founded in the 1880s. It completed construction of the Homestead extension in late 1925. In 1967 it merged with the Atlantic Coast Line to form the Seaboard Coast Line (SCL). In 1980 President Carter signed the Staggers Rail Act which revitalized the industry. That year SCL and the Chessie System (1973) merged to form CSX—C for Chessie, S for Seaboard, X for multiplication (CSX 2025). Segments of CSX Railroad resource groups (spurs) have been evaluated by the State Historic Preservation Officer (SHPO) as eligible for listing in the National Register of Historic Places (8DA11507, 8DA15132) due to their historical significance in the areas of Community Planning & Development and Transportation. Because 8DA23545 is a relatively recent spur, more information is needed to evaluate its eligibility for listing. However, it may have significance in the aforesaid areas as well as in the area of Industry due to its close association with rock mining in south Florida.

Mark777

2025 "CSX Abandons Lower Homestead Exemption." Railroad.net: Railroad Forums. https://railroad.net/csx-abandons-lower-homestead-extension-t170448.html#google_vignette accessed 8/15/2025.

CSX

2025 History and Evolution. CSX Transportation, Jacksonville, Florida. https://www.csx.com/index.cfm/about-us/history-evolution/ accessed 8/15/2025



USGS map showing the location of 8DA23545, Krome Groves Segment, West Kendall Spur, CSX Railroad.

TOWNSHIP 54S, RANGE 39E, SECTION 19

USGS MAP: SOUTH MIAMI NW, 1969

0 1 2 MILES

N

Exhibit 30-2
Letter from the Florida Department of State
Division of Historical Resources

2005.66

FLORIDA DEPARTMENT OF STATE
Glenda E. Hood
Secretary of State
DIVISION OF HISTORICAL RESOURCES

September 6, 2005

Mr. Robert S. Carr
Archaeological and Historical Conservancy, Inc.
4800 S.W. 64th Avenue, Suite 107
Davie, FL 33314

Re: DHR Project File No. 2005-8824 / Received by DHR: August 19, 2005
A Reconnaissance Archaeological Survey of the Krome Groves Parcel, Miami-Dade County, Florida

Dear Mr. Carr:

We note that in August 2005, Archaeological and Historical Conservancy, Inc. (AHC) conducted the above referenced survey for The Curtis Group in anticipation of a request by the Florida Division of Historical Resources for a cultural resource assessment survey. Our office proceeded to review this report with the expectation that The Curtis Group will be engaging in permitting processes that will require this office to comment on possible adverse impacts to cultural resources listed or eligible for listing in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural, or archaeological significance. We recommend at the time such actions are taken, a copy of this letter be forwarded to the permitting agency(ies) with the application. This may eliminate the permitting agency(ies) from having to submit an application to the Division of Historical Resources for review or, if applications are forwarded to the Division with this letter, it would facilitate our review.

No cultural resources were identified during this investigation. It is the opinion of AHC that the proposed development will have no effect on cultural resources listed or eligible for listing in the *NRHP*, or otherwise of historical, architectural or archaeological value. AHC recommends no further investigation of the subject parcel.

Based on the information provided, our office concurs with these determinations and finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

We request that future submissions to this office include unbound original Survey Log Sheets/Site Forms and appropriate maps.

If you have any questions concerning our comments, please contact Beth Chambless, Historic Sites Specialist, by phone at (850) 245-6333, or by electronic mail at ejchambless@dos.state.fl.us. Your continued interest in protecting Florida's historic properties is appreciated.

Sincerely,

for Frederick Gaske, Director, and
State Historic Preservation Officer

500 S. Bronough Street • Tallahassee, FL 32399-0250 • http://www.flheritage.com

☐ Director's Office (850) 245-6300 • FAX: 245-6436
☐ Archaeological Research (850) 245-6444 • FAX: 245-6436
■ Historic Preservation (850) 245-6333 • FAX: 245-6437
☐ Historical Museums (850) 245-6400 • FAX: 245-6433
☐ Southeast Regional Office (954) 467-4990 • FAX: 467-4991
☐ Northeast Regional Office (904) 825-5045 • FAX: 825-5044
☐ Central Florida Regional Office (813) 272-3843 • FAX: 272-2340

PARKLAND
2004-22

FLORIDA DEPARTMENT OF STATE
Glenda E. Hood
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Rob Curtis
The Curtis Group
7520 Red Road, Suite M
South Miami, Florida 33143

July 28, 2005

RE: DHR Project File Number: 2005-7265
Received by DHR July 15, 2005
Parkland Development of Regional Impact
Miami-Dade County

Dear Mr. Curtis:

Our office received and reviewed the above referenced project in accordance with this agency's responsibilities under Section 380.06, *Florida Statutes*. The State Historic Preservation Officer is to advise in the identification of historic properties (listed or eligible for listing in the *National Register of Historic Places*, or otherwise of historical or architectural significance), assess effects upon them, and consider alternatives to avoid or minimize adverse effects.

We have reviewed *Question 30 - Archaeological and Historical Resources* and note that a cultural resource survey will be performed. This office concurs with this action. The purpose of this survey will be to locate and assess the significance of historic properties present. The resultant survey report will conform to the specifications set forth in Chapter 1A-46, *Florida Administrative Code*, and will be forwarded to this agency in order to complete the process of reviewing the impact of this proposed project on historic properties.

If you have any questions concerning our comments, please contact Scott Edwards, Historic Preservationist, by electronic mail *sedwards@dos.state.fl.us*, or at 850-245-6333 or 800-847-7278.

Sincerely,

Barbara C. Mattick
Chief, BHP

for Frederick P. Gaske, Director, and
State Historic Preservation Officer

XC: Lisa Lorbeck, South Florida RPC

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31. AIRPORTS

A. Airports

Existing Conditions

1. **Describe any existing airport operations within the project site which includes the following information:**
   - **airports classification;**
   - **size (square feet) of the existing terminal;**
   - **number of runways and length;**
   - **location and size of clear zones;**
   - **types of aircraft which presently use the facility;**
   - **location and size of fuel storage facilities;**
   - **type and annual tons of cargo;**
   - **number of annual enplaned passengers; and**
   - **if available, historical trends of number of enplaned passengers for each five-year interval of past**

   None of the airport operations described above are proposed within the City Park project boundaries.

2. **Provide a map showing the locations of the present flight patterns, the existing aircraft noise contours (65, 70, and 75 Ldn), and the existing land uses within these contours.**

   Figures 31-1 and Figure 31-2 display the Tamiami Airport Land Use Zoning and Zoning Height. City Park is vacant and used for farming. Therefore, the existing land uses within these contours is agriculture.

3. **Describe the proposed airport facilities and services within the project site (e.g., new structures, runways).**

   No airport facilities or services are within the City Park project boundaries.

4. **Provide projections for each five-year interval through the useful life of the project as follows:**
   - **airport classification;**
   - **size (square feet) of the proposed terminal;**
   - **number of runways and lengths;**
   - **size and location of clear zones;**
   - **type of aircraft that would use the facilities;**
   - **size and location of fuel storage facilities;**
   - **type and annual tons of cargo; and**
   - **annual number of enplaned passengers.**

   No airport facilities or services are proposed within the City Park project boundaries.

B. Provide a copy of any proposed or approved Airport Layout Plan.

No airport facilities or services are proposed or approved within the City Park project boundaries.

C. If FAA authorization has been requested attach a copy of the application and FAA action, if any.

It was agreed through the Agreement to Delete Questions dated May 8, 2025, that a response to this Question is not necessary.

D. Provide a map showing the locations of the projected flight patterns, the projected (through the useful life of the project) aircraft noise contours (65, 70, and 75 Ldn), and the existing and future land uses within these contours. Indicate on this map the authorities and/or jurisdictions which exercise land development controls over land uses encompassed within all projected noise contours. Specify steps that will be taken to mitigate noise impacts exceeding 65+ Ldn in the surrounding community.

The City Park project site is located over ¾ mile from the nearest 65 Ldn noise contour associated with Miami Executive Airport (TMB), as documented in the 2023 Noise Contour Report prepared by HMMH. The report models aircraft noise exposure based on forecasted airport activity levels for the years 2028 and 2043, using the FAA's Aviation Environmental Design Tool (AEDT).

Figures 31-3A and B, and Figure 31-4 display projected flight paths and 65, 70, and 75 Ldn noise contours**,** respectively.

Within the noted noise contours, the existing land use is Airport and the future land use is Terminals as designated by the adopted CDMP 2023 and 2040 Land Use Plan.

All land uses located within the projected 65+ Ldn contours fall under the regulatory control of:

- Miami-Dade County Department of Regulatory and Economic Resources (RER) — responsible for zoning, permitting, and CDMP compliance
- Miami-Dade County Aviation Department (MDAD) — providing coordination on airport-area land use compatibility

The City Park property lies entirely outside of the 65+ Ldn noise contours for both 2028 and 2043. As such:

- No portion of the project site is subject to aircraft noise levels considered incompatible with sensitive land uses, as defined by the FAA and Florida Department of Transportation.
- Residential, educational, and civic uses within the City Park plan are sited with full consideration of their spatial relationship to TMB and its flight operations.

- The site's distance from the airport ensures that ambient noise conditions are well within acceptable levels for urban development.

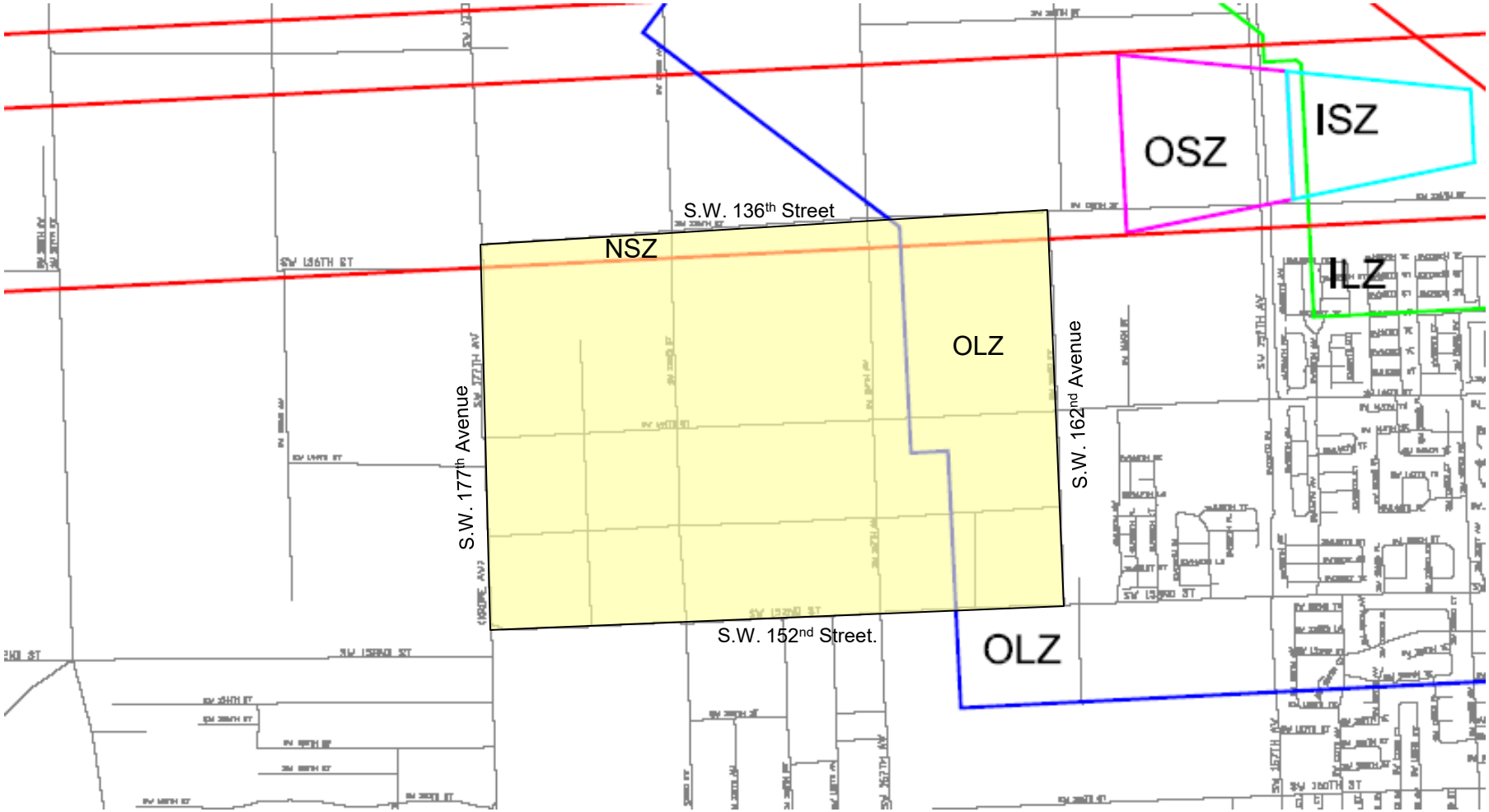
In summary, City Park has been thoughtfully located and master-planned to avoid conflicts with existing or future aircraft noise exposure zones. The site's **distance from the airport**, coupled with its **sensitive land use siting strategy**, ensures compatibility with regional airspace operations and reinforces Miami-Dade County's land use planning goals for livability and environmental quality.

E. Project subsidiary development on site, adjacent to the site, or on sites over which any airport agency or authority exercises land development controls. Include cargo authority handling facilities, warehouses, aircraft maintenance and overhaul facilities, industrial parks, etc.

It was agreed through the Agreement to Delete Questions dated May 8, 2025, that a response to this Question is not necessary.

F. Describe the existing and proposed ground passenger circulation system. What are the existing and proposed linkages to other transportation systems in the region? Specify extensions or improvement to those systems that will be required to serve the proposed facility. Identify what efforts will be made to promote public transit.

It was agreed through the Agreement to Delete Questions dated May 8, 2025, that a response to this Question is not necessary.



Legend

Project Site

Figure 31-1
Tamiami Airport Land Use Zoning
City Park
August 2025

Source: The Curtis Group

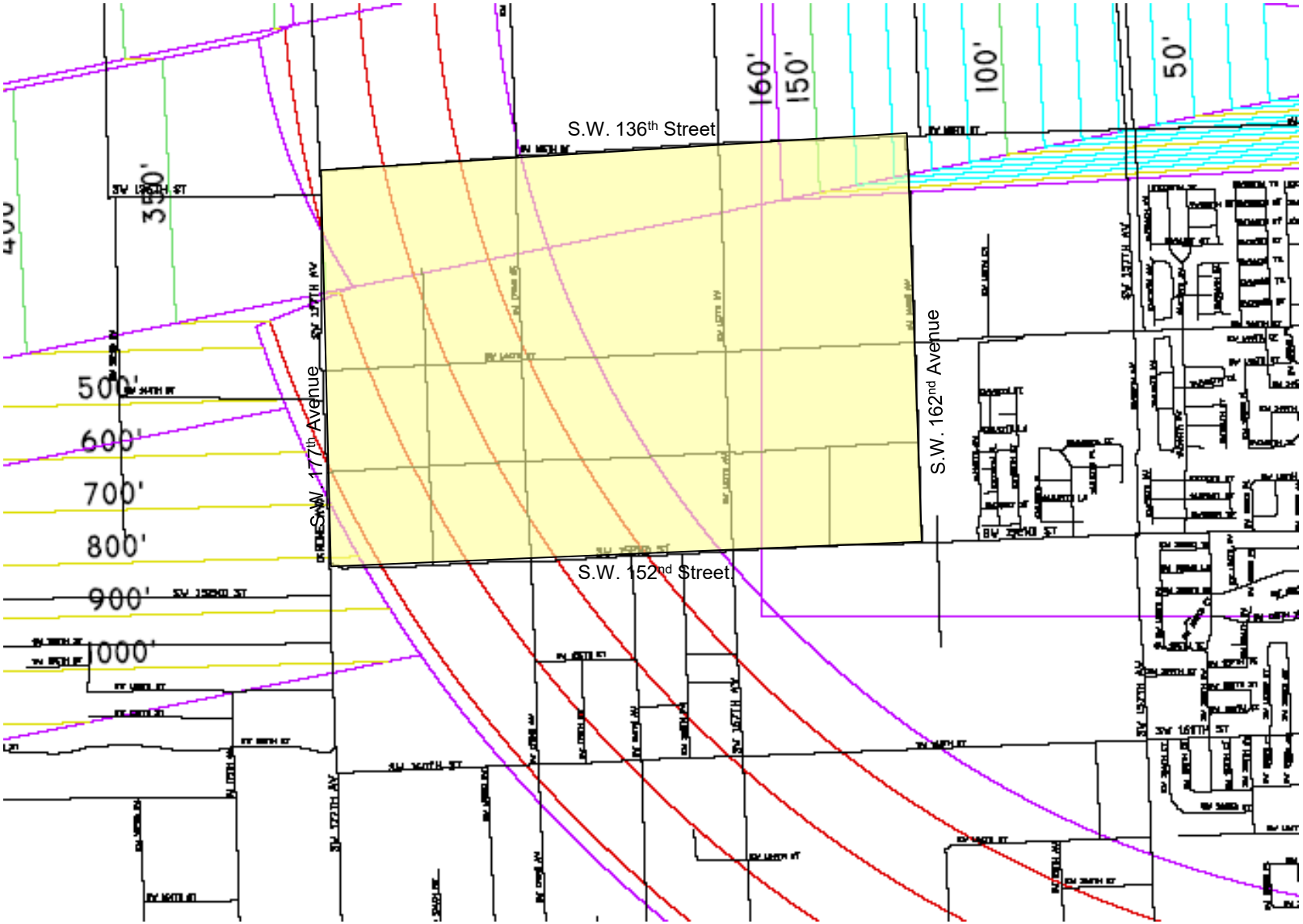
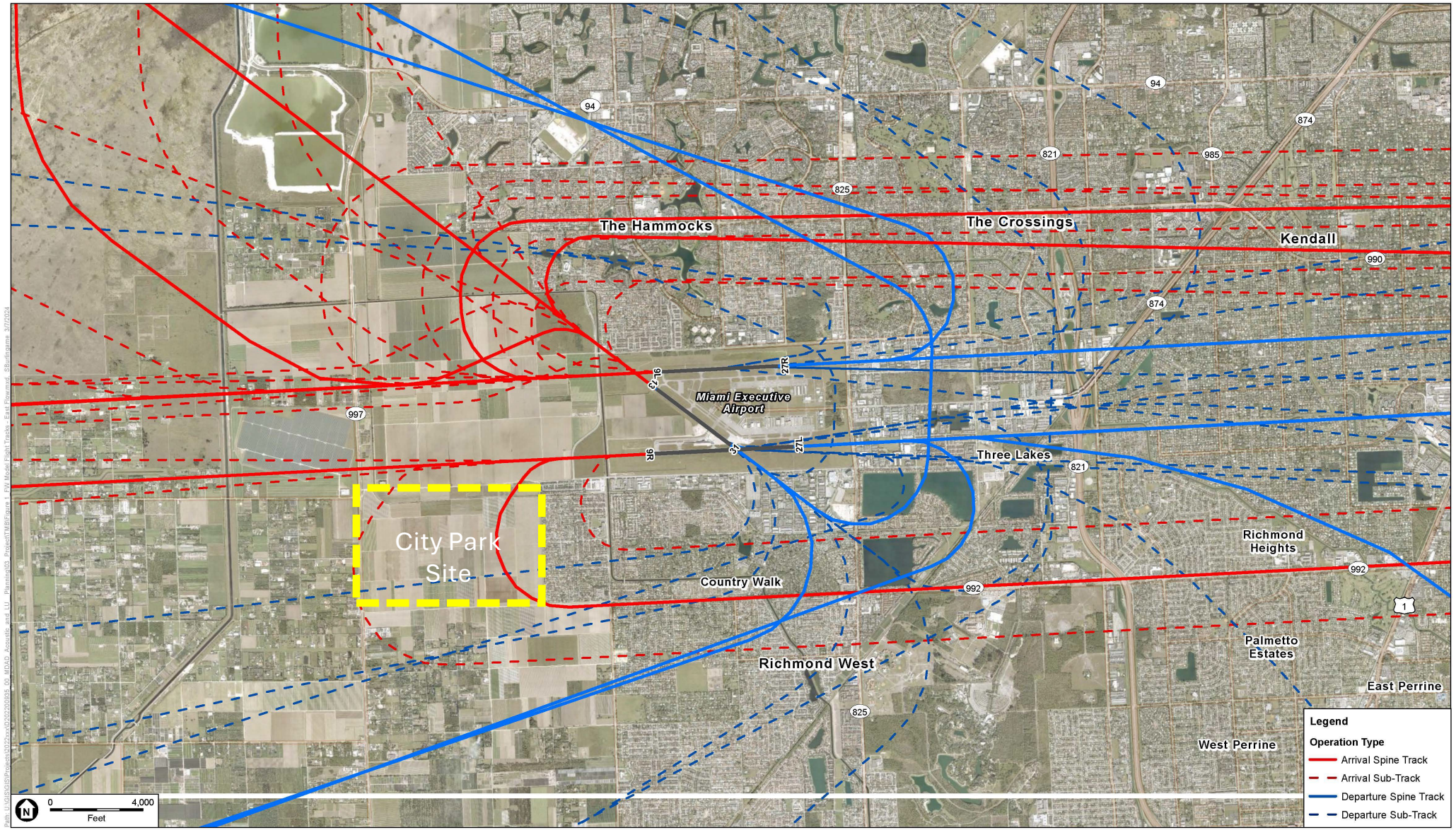


Figure 31-2
Tamiami Airport Zoning Height
City Park
August 2025

Source: The Curtis Group



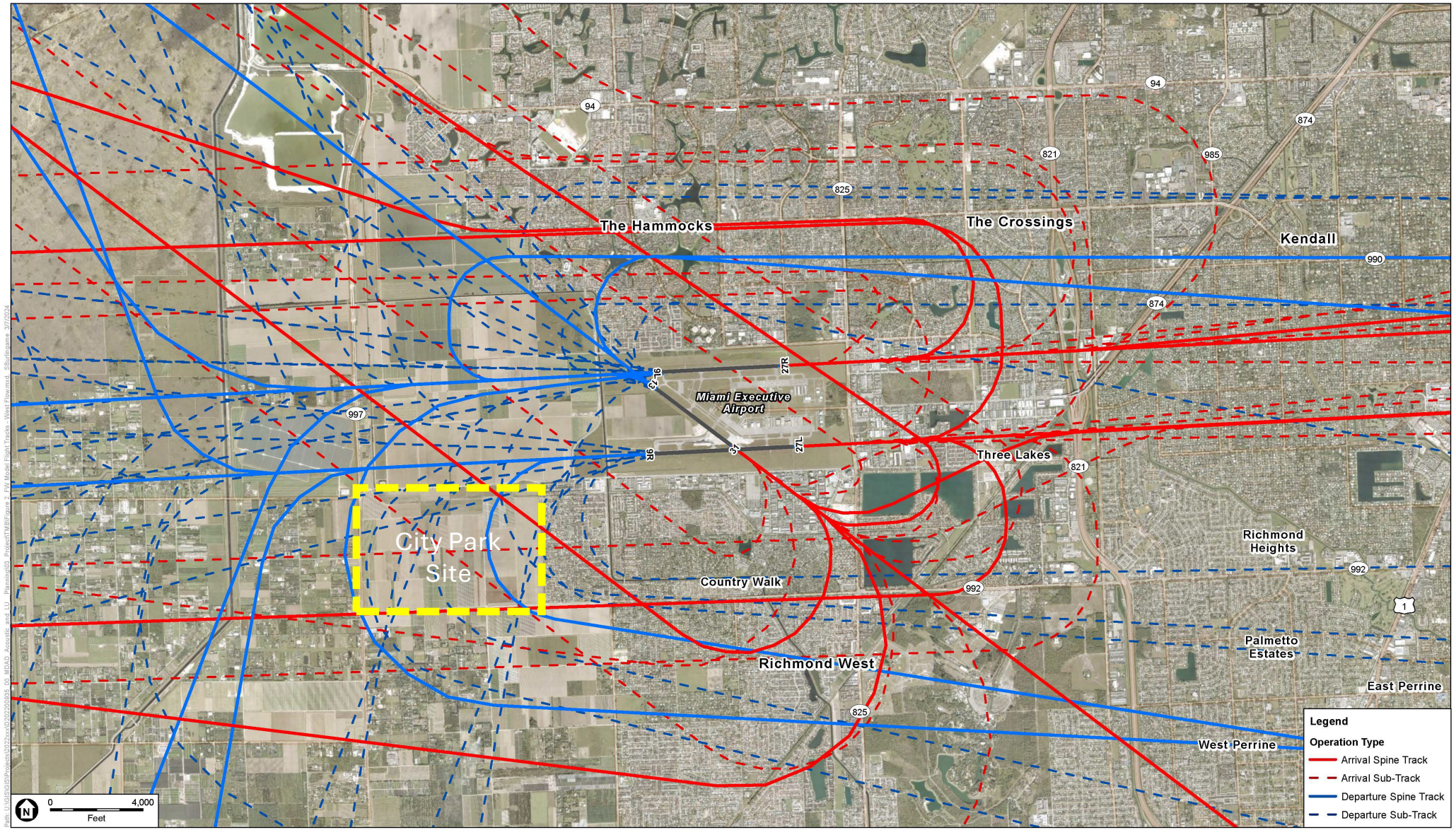
SOURCE: AEDT 3f; ESA, 2024.
AEDT = Aviation Environmental Design Tool.

Miami Executive Airport CY2023 Noise Contour Update

Figure 1
Fixed-Wing Model Flight Tracks - East Flow

ESA

DRI ADA Q31 - Airports
Figure 31-3A - Projected Flight Path - East Flow



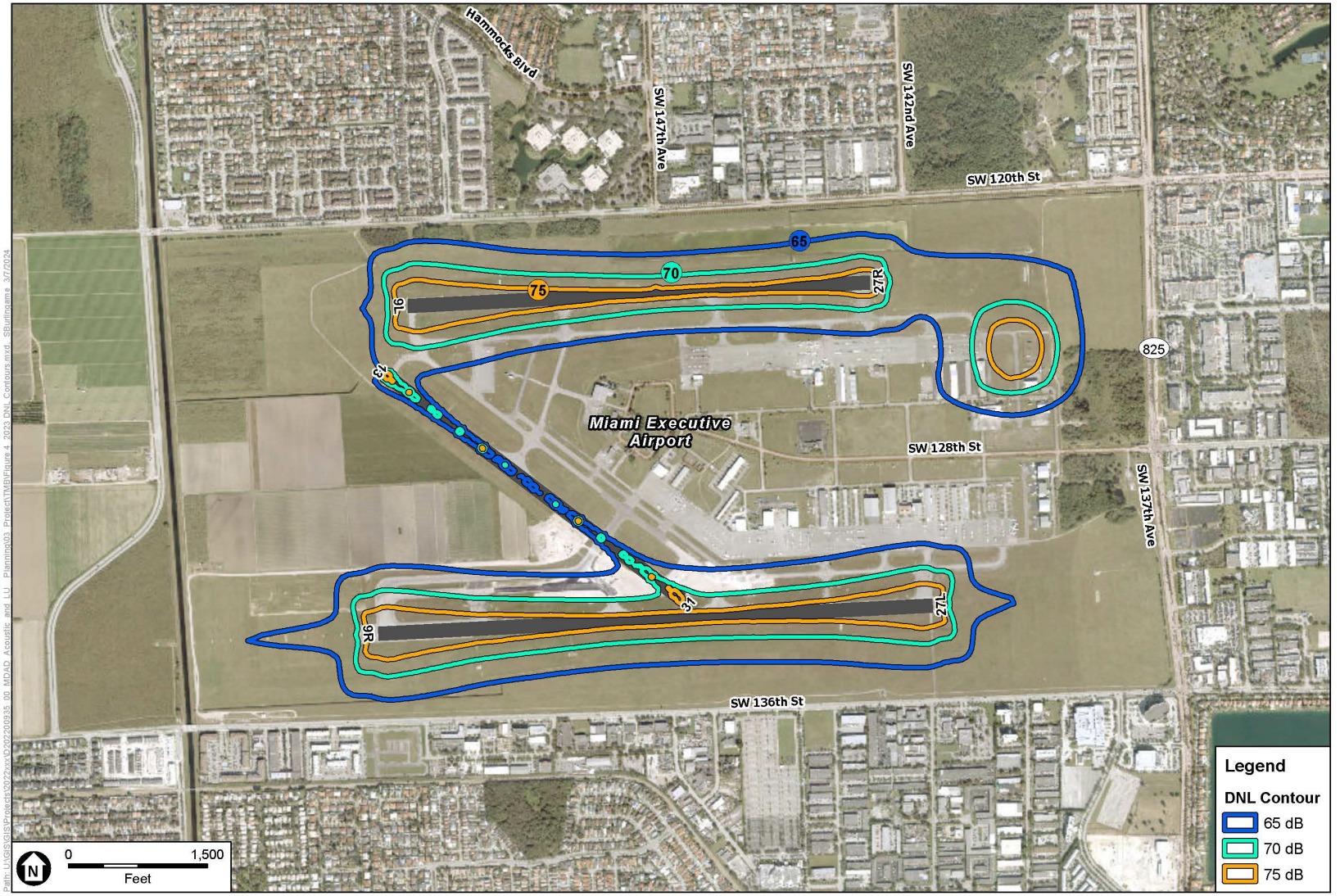
SOURCE: AEDT 3f; ESA, 2024.
AEDT = Aviation Environmental Design Tool.

Miami Executive Airport CY2023 Noise Contour Update

ESA

DRI ADA Q31 - Airports
Figure 31-3B - Projected Flight Path - West Flow

Figure 2
Fixed-Wing Model Flight Tracks - West Flow



SOURCE: Esri; AEDT 2d and 3f; ESA, 2024.
AEDT = Aviation Environmental Design Tool.
DNL = Day-Night Average Sound Level.
dB = Decibel.

Miami Executive Airport CY2023 Noise Contour Update

DRI ADA Q31 - Airports

Figure 31-4 Noise Contours

Figure 4
2023 DNL Contours

34. INDUSTRIAL PLANTS AND INDUSTRIAL PARKS

A. Indicate the types of operations that will occupy the site using appropriate Division and two-digit Standard Industrial Classifications.

City Park is anticipated to be a mixed-use development comprised of residential, retail, office, warehouse, parks and community uses. Likely industrial related uses of this development are listed in response to **Question 10 – General Project Description** in this DRI ADA.

B. What supplier and other supporting industry are required within the region by the proposed development? Estimate to what degree these linkages will require the location in the region of supporting industrial and commercial activity.

Suppliers associated with the construction industry and trades will be required during the pre-development stage. These suppliers include: steel fabrication, lumber and wood, concrete and building block manufacturers, building materials and finishes, contractors, mechanics, and land movers. Also, professional services, such as banking, marketing, and management, will be required. There is a vast supply of these industries in the immediate region.

The post-development stage requirements for supporting warehouse activity will vary with the actual composition of the tenants. Therefore, the post-development requirements cannot be accurately estimated at this time. However, growth trends in Miami-Dade County indicate the presence and availability of the typical services and infrastructure.

C. Will the proposed operations require the expansion of any transportation systems and facilities in the region (rail, truck terminals, etc.)?

Please refer to **Question 21 – Transportation** of this DRI ADA. The anticipated tenant mix will not require rail service or truck terminals

D. How many shifts per day are expected and what will be the average number of employees per shift? Specify approximate hours of shift. Will this vary through the project life?

The number of shifts, employees per shift, and duration of each shift is dependent on tenant composition. It is, therefore, not possible to project accurate data at this time. However, the majority of the employment is anticipated to be during normal work hours.

39. SEA LEVEL RISE

A. 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.

The Applicant is considering on-site improvements to reduce vulnerability to sea-level rise (SLR) and groundwater inundation over the next 50 years, based on guidance from Miami-Dade County's policy and regional climate adaptation plans. These considerations include:

- **Raise street grades and sidewalks** at least 4.5 ft (NOAA Intermediate-High curve) above current mean sea level to maintain flood-free access. These horizontal surfaces also serve as natural stormwater conveyances

- Implement **green infrastructure**—including bioswales, rain gardens, and permeable paving—to slow runoff, promote infiltration, and buffer fluctuating groundwater levels

- Design drainage systems to function with higher water tables by incorporating **elevated invert levels and stormwater retention basins** sized for 2040–2070 projections

- **Elevate or seal manholes and vaults** above projected ground water levels and install non-return valves to block sewer backflow

- **Elevate electrical equipment** (transformers, panels, junction boxes) above the 2070 SLR design elevation (approx. 4.5 ft NAVD) and waterproof low components

- Where elevation is infeasible, **seal equipment with watertight enclosures** rated to anticipated flood depths

- Create **retention areas** that perform dual functions of flood control and habitat, increasing storage capacity and resilience

40. AGRICULTURE

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.

Miami–Dade County's agricultural industry and profitability over the past several decades has undergone a tectonic shift from row crops which now compete with Mexico and other trade partners towards nursery and floriculture operations which continue to be protected from foreign competition given USDA restrictions on importation of soil.

In the latest U.S. Census of Agriculture (2022), nursery and floriculture sales represented more than 83% of the county's agricultural revenue while utilizing just 19% of its farmland. By contrast, traditional row crops and other farm activity consume 83% of agricultural acreage yet account for only 19% of sales. This pronounced imbalance highlights the superior economic efficiency and viability of high-value nursery production, the challenges row crops face without federal protection on imports, and the fact that the County's 2022 agricultural study and plan indicates that foreign competition "*pose a dire threat*"[1] to fruit and vegetable crops and for the key fruits and vegetables historically grown in the County *"minimal profits challenge growers to remain in the industry."*[2]

City Park is being developed on farmland which has been leased to farmers who exclusively grow row crops.[3] It has never been used for nursey or floriculture growth. As a result, when proposing a 1,000 acre- mixed use development outside the Urban Development Boundary, it is essential to recognize that such a project would not erode the county's agricultural capacity. With approximately 68,800 acres- of active farmland already in place, displacing 1,000 acres does not jeopardize the county's ability to maintain its agricultural output or economic thresholds, particularly when the dominant revenue generator is nursery/floriculture grown in other areas of South Dade, not the row crops which were farmed on the land upon which the project is being developed.

Notably, Miami–Dade's position in ornamental plant production—ranking first in the U.S.—and its continued expansion illustrate that nursery/floriculture is stable.

[1] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. ES-3
[2] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. 23
[3] Indeed, the reason why the development land is currently leased and farmed is because the owners are able to benefit from the ad valorem exemption associated with agricultural land and despite an expectation and attempt at making a profit from farming, the land has failed to generate any profit for the owners.

However, sustaining nursery and floriculture production requires relatively modest land allocations. Of the county's roughly 13,300 acres devoted to nursery/floriculture, increased greenhouse use, and advanced production techniques can accommodate market demand with little or no additional farmland. Additionally, while nursery and floriculture have thrived in the past, the County's own agricultural report indicates that future demand for new nurseries and floriculture will be limited given increased competition from other states: *"The nursery/floriculture industry, the dominant agricultural sector in Miami-Dade County, has been the most rapidly growing major segment of U.S. agriculture for the past 30 years, but is now considered a mature industry with slower growth rates likely in the future"*[4] Indeed, the University of Florida report indicates that demand for farmland overall is expected to decrease over the next several decades from 68,837 acres in 2022 to 56,284 acres in 2050 or a reduction of more than 12,000 acres. Compared to the 68,837 acres used for agriculture in the 2022 Census, by 2030 alone, the mean projected demand for agricultural land in Miami-Dade County will decline by more than 4,000 acres and another 4,000 +/- by 2040 according to the county's own report.[5] In this context, a 1,000acre- development—even sited outside the UDB—can proceed without any impact on the county's agricultural economy[6].

In summary, the county's agriculture future lies in embracing nursery and floriculture as its dominant agricultural engine. A mixed-use project of the size proposed—carefully sited and planned—will not erode Miami–Dade's agricultural capacity. On the contrary, by facilitating strategic land-use shifts toward high-value agriculture, the development can preserve both economic vitality and farmland integrity.

[4] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. 29

[5] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; Mean of 5 mid-range projections Table 20.8 p. 225

[6] On March 19, 2024, the Miami-Dade County Board of Commissioners adopted Ordinance No. O-24-27 which amended Sections 33-1, 33-8, 33-14.1 and 33-279 of the Miami-Dade County Code of Ordinances and created the Miami-Redland Agritourism District ("MRAD") The MRAD is the area consisting of lands that are located outside the UDB, are part of the Agricultural District, and are located between SW 88 Street/Kendall Drive and Old Ingraham Highway. The amendment primarily expanded the permitted range of commercial and entertainment uses. For example, it added outdoor amusements such as pub games, inflatable waterslide pools and other small water-related or inflatable devices, zip lining, and paintball.

It also introduced a requirement for Conditional Use ("CU") approval and applicable permits for mobile food service operations on agricultural zoned ("AU") properties. In addition, the amendment removed the requirement for applicants in the AU district to obtain Environmental Quality Control Board ("EQCB") approval for food service on properties served by well, septic tanks, or both, allowing instead for administrative review and approval.

Finally, the amendment removed CU requirements for certain agricultural uses, including but not limited to, barns, sheds, small packing facilities, dairy barns, cattle or stock grazing, and farm stands. The amendment primarily addresses agritourism and are intended to help local farms diversify their operations for entertainment purposes under less restrictive regulations.

Applicant shall:

a. **Detail how its proposed development will not infringe on equipment movement for agricultural properties within the area**.

   The CSX railroad runs adjacent to the northern boundary of City Park. Currently, there is one rail crossing in northwest corner of the Project Site at theoretical NW 136 Avenue. Farm equipment may continue to use this crossing in the future.

b. **Provide methodologies, assumptions, data sources, and analyses used to analyze SERPM the implications of converting the project site from Agriculture to other uses.**

   The methodologies, assumptions, data sources, and analyses used to respond to each ADA Question are noted in each response**.**

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**.

   See response to ADA Question 19 – Stormwater Management.

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.**

  See response to ADA Question 19 – Stormwater Management.

- **Utilize SFWMD ERP Applicant's handbook for total rainfall depth for key design storms**.

  See response to ADA Question 19 – Stormwater Management.

- **SCS Design Methodology to estimate total runoff volume generated by the development.**

  See response to ADA Question 19 – Stormwater Management.

- **Utilize Harper Methodology, as developed with FDEP, and the BMP Trains software to determine the pre-development vs. post-development nutrient loading concentrations.**

See response to ADA Question 19 – Stormwater Management.

- **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**.

  See response to ADA Question 19 – Stormwater Management.