10. GENERAL PROJECT DESCRIPTION

PART 1 SPECIFIC PROJECT DESCRIPTION

A. Describe and discuss in general terms all major elements of the proposed development in its completed form. Include in this discussion the proposed phases (or stages) of development (not to exceed five years), magnitude in the appropriate units from Chapter 28-24, F.A.C., where applicable, and expected beginning and completion dates for construction.

City Park (alternatively the "Project") presents a transformative opportunity to establish a master-planned, resilient community that exemplifies sustainable growth and balanced urban development within Miami-Dade County. Envisioned as a forward-looking model for community-building, the Project integrates a rich mix of land uses that promote walkability, connectivity, accessibility, and long-term climate adaptability. With 954 acres of developable land, City Park is designed to support a full spectrum of residential densities, commercial services, educational institutions, civic infrastructure, and recreational amenities—creating a complete and inclusive "live, work, play, and learn" urban environment.

Project Overview

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, 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 proposed development program for City Park is shown in **Table 10.A.1**, below.

TABLE 10.A.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

* Multi-family uses will be included in both residential and mixed-use areas of City Park.

The proposal reflects best practices in comprehensive land use planning, urban design, multimodal connectivity, and integrated open space systems. City Park is intended to function as a complete community—providing a balanced mix of housing, employment, public facilities, and recreation—while advancing regional goals for sustainability, mobility, and livability.

Land Use Framework and Mix of Uses

City Park's land use program is organized around a hierarchy of sub-villages that structure density, intensity, and character across the site. Land uses are distributed as follows:

- **Residential (52% of site):** 7,800 units across Low-, Medium-, Medium-High-, and High-Density Residential categories, with target densities ranging from 6 to 30 units per acre.
- **Non-Residential (9% of the site):** Over 2,000,000 million square feet of commercial, office, and light industrial uses to support internal job creation and services.
- **Mixed-Use (9% of the site):** Transit-Oriented, Village, Park, Industrial, and Farm Mixed-Use designations to foster walkable neighborhoods with integrated services.
- **Community Services (4% of the site):** Schools, public facilities, and rail corridor improvements.
- **Open Space and Parks (25% of the site):** A robust network of public parks, lakes, plazas, agricultural land, and trail corridors.

This integrated framework reflects consistency with Miami-Dade County Comprehensive Development Master Plan ("CDMP") objectives, including policies promoting mixed-use centers, transit-oriented development ("TOD") near future transit, and development that balances housing and employment.

Urban Design Principles and Community Structure

The master plan is guided by a series of urban design principles aligned with contemporary planning frameworks, including:

- **A mixed-use Village Core** to function as the civic, cultural, and retail heart of the community.
- **A TOD Center** adjacent to a potential future CSX Portland Spur node, proposed regional mobility hub, and regional roadway improvements.
- **Compact blocks and a connected street network** promoting walkability and modal choice.
- **Distributed parks, plazas, and civic spaces** to support access to open space and public life.

Development intensities are scaled to context, with **higher-density and vertical mixed-use** concentrated around transit and activity centers, and **lower-density residential** providing a buffer toward the site's perimeter. This organizational

structure offers a **deliberate transition in intensity and scale**, reinforcing a legible community form and supporting multimodal connectivity.

The design aligns with the Strategic Regional Policy Plan (SRPP) for South Florida, particularly:

- **Goal 3: Land Use**, which calls for *"compact, well-designed communities that reduce sprawl and foster a sense of place."*
- **Objective 3.1**, which encourages land development patterns that promote *context-sensitive infill and intensification* within urban service areas.
- **Policy 3.1.3**, which emphasizes the integration of *residential, commercial, civic, and recreational uses* to reduce the need for vehicular travel.

Furthermore, the plan supports **Goal 4: Transportation**, by coordinating land use and mobility planning to increase access to transit and reduce reliance on single-occupancy vehicles—consistent with **Policy 4.1.1**, which advocates for mixed-use, transit-accessible, pedestrian-friendly development patterns.

This land use structure not only reflects sound urban design principles but also reinforces the region's long-term **resiliency**, **transportation efficiency**, and **growth management objectives**, in accordance with the SRPP's vision for a sustainable and connected South Florida.

Open Space, Parks, and Resiliency Infrastructure

A defining feature of the City Park plan is its integrated open space framework, which comprises 249.5 acres (25% of the site), including:

- **The Central Greenway and Lake System:** Dual-purpose passive recreation and stormwater management infrastructure.
- **Community and Pocket Parks:** Within walking distance of all neighborhoods, offering passive and active programming.
- **The Parkway and Green Connections**: Linear open space corridors that enhance mobility, identity, and ecological function.
- **The Farm:** A 10-acre agricultural amenity supporting education, food security, and cultural programming.

These systems address both regulatory requirements and resiliency goals by embedding stormwater management, shading, and heat mitigation throughout the public realm.

Mobility, Access, and Transit Readiness

City Park's transportation framework is designed to reduce vehicle dependency and expand multimodal access through:

- **A Complete Street Network:** Including boulevards, loop roads, and connectors structured around pedestrian safety and multimodal hierarchy.

- **Transit-Oriented Development Node:** Located near a potential future CSX line extension and programmed to accommodate a regional mobility/transit hub.
- **Bicycle and Pedestrian Infrastructure:** Class I trails, dedicated bike lanes, and esplanades connecting to regional assets such as the Black Creek Trail.

The plan supports internal trip capture by locating daily needs—grocery, health, schools, recreation—within short walking distances of residential areas.

Environmental and Climate Resiliency

City Park incorporates forward-looking resiliency measures that are consistent with Miami-Dade County policies on environmental design, sustainability, and long-term climate adaptation. The planning and site design intentionally integrate ecological function with human health, infrastructure efficiency, and public benefit. Key features include:

- **Stormwater Infrastructure Integrated with Open Space**: Lakes, greenways, and bioswales are designed as dual-purpose features, managing runoff while creating usable public open space and reinforcing site-wide green infrastructure networks.
- **Native and Climate-Adapted Landscaping**: Plant palettes emphasize native and drought-tolerant species to reduce irrigation demand, support biodiversity, and strengthen habitat connectivity within the built environment.
- **Food Resiliency through Urban Agriculture:** The project includes a designated **Farm District** that provides opportunities for community-supported agriculture, school partnerships, and demonstration gardens. This feature supports localized food production, enhances community nutrition, and aligns with the County's broader vision of resilient land use.
- **Urban Heat Island Mitigation:** Tree canopy coverage, shaded public spaces, and compact land use patterns reduce ambient temperatures and improve thermal comfort in the face of rising urban heat.

Collectively, these strategies advance key elements of the County's "Resilient305" and "GreenPrint" initiatives.

Conclusion

City Park offers a well-conceived, technically robust development program that meets Miami-Dade County's long-range planning goals. The plan demonstrates thoughtful integration of land uses, infrastructure, environmental systems, and community amenities.

B. Provide a breakdown of the existing and proposed land uses on the site for each phase of development through completion of the project. The developed land uses should be those identified in Section 380.0651, F.S. and Chapter 28-24, F.A.C. Use Level III of The Florida Land Use and Cover Classification System: A Technical Report (September 1985), available from each regional planning council. Refer to Maps D (Existing Land Use) and H (Master Plan). Use the format below and treat each land use category as mutually exclusive unless otherwise agreed to at the preapplication conference.

Table 10-2 - Existing and Proposed Land Uses presents a breakdown for both the existing and proposed land uses on the Project site.

TABLE 10-2
EXISTING AND PROPOSED LAND USES

Land Use	Non-Residential		Residential				Total Acreage
	Units	Acres	DU	Acres	Net Density	Gross Density	
Existing Vegetation Associations							
Row Crops (214, FLUCCS)		937					
Existing Railroad ROW		17					
Total Acreage		**954**					
Proposed Project (2026 - 2036)							
Total Residential (28-24.023, F.A.C.)	7,800 units	498	7,800		10.6 du/acre	8.2 du/acre	
Retail (28-24.031, F.A.C.)	749,153 gsf	29					
Office (28-24.020, F.A.C.)	500,000 gsf	15					
Industrial (28-24.018, F.A.C.)	892,484 gsf	40					
Mixed Use		85					
Schools & Public Facilities	(1) Elementary (1) Middle (1) High School	20					
Community Uses – Open Space, Parks, Farm, Water		250					
Railroad ROW		17					
Total Acreage							954

Source: The Curtis Group

C. Briefly describe previous and existing activities on site. Identify any constraints or special planning considerations that these previous activities have with respect to the proposed development.

The Subject-Parcel has been heavily impacted by past and present agricultural activities, as shown on **Map B - Aerial Photograph.**

D. If the development is proposed to contain a shopping center, describe the primary and secondary trade areas which the proposed shopping center will serve.

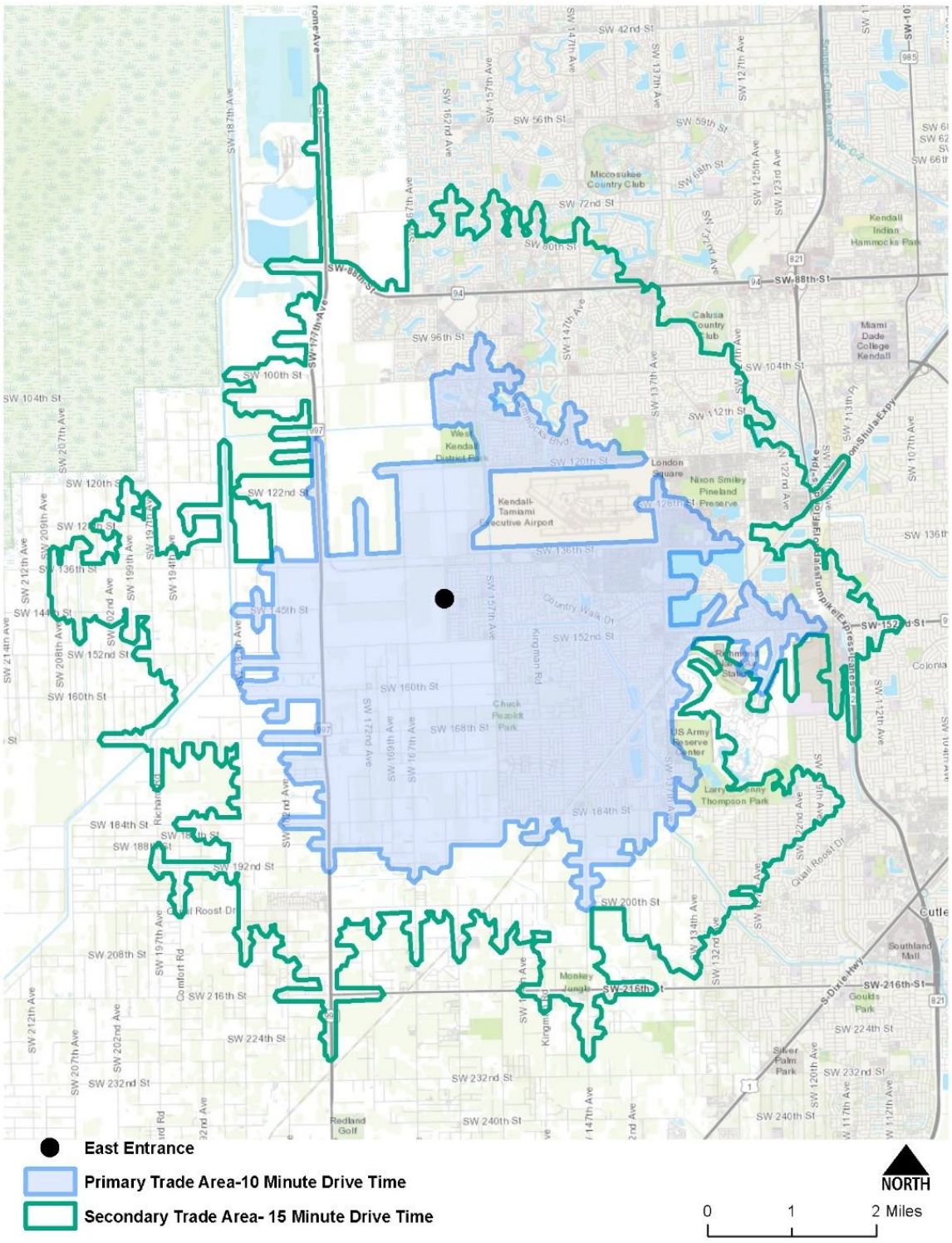
City Park's retail and commercial component plans for a total 749,153 square feet of space that will be spread among numerous locations and facilities including stand-alone shopping center, ground floor retail within mixed-use development and outparcel buildings. While the retail and commercial development will unquestionably serve not just the City Park community, but the broader surrounding south Miami-Dade County community, it is envisioned to represent neighborhood shopping primarily serving the City Park residents, workers and surrounding area visitors as opposed to a more regional/destination offering. The vast majority of City Park retail will be situated within facilities ranging from 30,000 to 125,000 square feet, which is the defined footprint of Neighborhood Centers according to the International Council of Shopping Centers (ICSC)[†] and categorized as convenience-oriented uses including supermarket. Accordingly, ICSC determines Neighborhood Centers to draw demand from within a 3±-mile distance radius. Considering this, the primary trade area for City Park is captured within a 10-minute drive time from the intersection of SW 144th Street and SW 162nd Avenue, while a secondary trade area extends to a 15-minute drivetime radius. A summary overview of each trade area follows, with a map of an overlay map of both areas on the following page.

Primary Trade Area: The primary trade area is largely defined within a 2- to 3-mile radius. According to ACS 2023, total population within the primary trade area is 65,783, with 20,042 total households. The median household income within this geography is $97,216, providing for $1.9 billion in aggregate income to secondarily support City Park retail. In terms of retail/commercial supply, Costar indicates 1.6± million square feet of retail space with 340,000± square feet having been delivered in the primary trade area in the past 10 years. The vacancy rate in the entire primary trade area is currently less than 1.0 percent and has remained below 3 percent for the past 10 years. NNN lease rates[‡] have increased an average 4.3 percent annually during the past 10 years, which is in line with the County's 4.5 percent average annual growth rate.

Secondary Trade Area: The secondary trade area generally extends to a 3- to 4-mile radius. According to ACS 2023, total population within the secondary trade area is 179,233, with 57,482 total households. The median household income within this geography is $85,105, providing for $4.9 billion in aggregate income to secondarily support City Park retail. In terms of retail/commercial supply, Costar indicates 5.9± million square feet of retail space with 615,000± square feet having been delivered in the past 10 years in the secondary trade area. The vacancy rate is currently 1.3 percent and has remained below 3 percent for all but one of the past 10 years.

[†] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.icsc.com/uploads/t07-subpage/US-Shopping-Center-Definition-Standard.pdf

[‡] A lease structure whereby the tenant pays a base rent plus the costs of property taxes, insurance, and common area maintenance (CAM)



In all, the primary and secondary trade areas contain 57,482 households with an aggregate income of $4.9 billion. Approximately 35 percent of these households reside within the primary trade area which has a retail vacancy of a staggering <1.0 percent. As noted, a large amount of City Park's proposed retail demand is anticipated to be derived from its own resident, worker and visitor base.

Nonetheless, the surrounding trade area provides added support for City Park's new retail, dining, entertainment and services options, and notably, the level of retail planned for City Park will have almost no impact on the stability (occupancy) of the trade area retail sector.

E. Determine, in general terms, how demand for this project was determined.

The City Park DRI development program comprises a number of uses, including residential (homeownership and rental), retail, office, industrial, education, and entertainment uses. The following provides an overview of the methodology and analysis utilized to estimate demand for the primary development components during the development phase:

Residential Demand

At the outset, the opportunity for residential development at City Park is driven by a myriad of economic and demographic factors. As illuminated within a comprehensive Needs Assessment, the County is significantly challenged in the way of adequate land supply to service housing demand in cases where are large proportion of the market is not seeking or cannot afford the housing type for which land does exist. These conditions create considerable opportunity to provide attainable housing among a wide variety of housing typology among homeownership and rental product. Nonetheless, and as detailed in Question 24 - Housing, the established methodology for determining housing supply, demand and need for the City Park DRI establishes a geographic market area defined as a 20-minute drive time from the Subject Property and herein referred to as the Residential Market Area (RMA). This is the area from which demand for homeownership and multi-family rental housing is determined.

According to US Census data, the RMA's population increased from a broad perspective, the following table highlights the key population and household characteristics within the RMA:

TABLE 10 - E.1
Demographic Snapshot of RMA

Total Population ACS 2023	482,183
Total Population ACS 2013	447,078
Households ACS 2023	159,198
Avg. HH Size ACS 2023	3.05
Median Household Income ACS 2023	$81,348
% Above $75K ACS 2023	*53.6%*
% Above $100K ACS 2023	*39.6%*
Owner Occupied Households % ACS 2023	65.7%
Renter Occupied Households % ACS 2023	34.3%

Source: US Census (ACS 2023)

As summarized above, the RMA's population increased by 35,000 persons during the past decade (or, 3,500 per year on average), or an average annual growth rate of 0.9 percent per year. According to Miami-Dade County Transportation Planning Organization (TPO), the correlating Census Block Groups for the RMA indicate a population growth projection of an average 4,170 persons between 2015 and 2045 (0.8 percent growth rate) and an increase of an average 1,490 households during the period (0.88 percent average growth rate). These growth rates are moderately lower than the growth rates reported for the RMA between 2010 and 2020, which was an average 1.14 percent per annum.

However, one additional factor warrants consideration for the residential demand analysis. Land availability within the RMA capable of supporting large-scale residential development and, particularly, for lower and mid-density homeownership is fairly limited. City Park's homeownership development would unquestionably have a significant impact on the RMA's growth outlook and it is reasonable to assume that it would reach average annual growth rate in line with historical growth trends and even higher.

TABLE 10 - E.2
City Park RMA - Population And Household Forecast

Estimated Households (Year)	Est. 2026	2031	2036
TPO Growth (0.9%/yr.)	162,076	169,502	177,268
Net New HH's (TPO TAZ)		1,512	1,581
Cumulative HH's (TPO TAZ)		7,426	**15,192**
Modified Growth (1.25%/yr.)	162,076	172,462	183,514
Net HH's (Trendline)		2,129	2,266
Cumulative HH's (Trendline)		10,386	**21,438**

Sources: MDC TPO; Lambert Advisory

Based upon the household growth rates above, the RMA's potential housing demand ranges between 15,000 and 21,000 units. However, it is clearly recognized that not all of these household will be able to afford the homeownership and rental product in City Park. Therefore, the minimum affordability household income threshold is likely to be between $80,000 to $90,000 which is between 45 to 50 percent of RMA households as noted in Table 10 – E.1, above. This generates demand for roughly 7,500± to 11,000± housing units during the City Park development phase. Moreover, and generally in line with the RMA's housing tenure, two-thirds of the demand will be for homeownership, with one-third for rental.

Retail Demand

As discussed in **Section 10-D,** demand for City Park's proposed 749,200± square feet of retail will largely be driven from its own resident, worker, and visitor demand. Naturally, the commercial businesses and services within City Park will also attract residents, workers and visitors from outside of the area, including the primary and secondary trade areas defined within **Section 10-D**. Nonetheless, since a large share of City Park retail demand will be generated from within, the demand

analysis herein weighs much more heavily on demand generated from City Park residents, workers, and visitors with limited additional inflow demand from the surrounding market area.

As it pertains to residents and, specifically, the 7,800 new homeownership and rental households upon development completion, a comprehensive retail model (Lambert Advisory Retail Trade Model) has been utilized to determine demand from the prospective resident base with key inputs, including the 7,800 new residences will create a total population of 20,826 (at 2.67 persons per household); based upon preliminary homeownership and multi-family rental pricing; total household income that establishes a minimum average household income threshold of $155,000 (or, $59,200 per capita based upon the County's average household size); non-automobile retail expenditure for the of 20.5 percent of total personal income from the Department of Commerce Consumer Expenditure Survey (2023); non-auto expenditure by store type based upon the US Census of Retail Trade (2022); sales per square foot by type of goods based upon general market data; and outflow factors that account for retention and leakage among residents.

In addition to its residents, City Park's retail will generate demand from residents (and workers) from the surrounding market area utilizing the retail goods and services provided within City Park. It is challenging at this point to establish the level of visitors to City Park from the surrounding community in the absence of more detailed programming. Therefore, the retail trade model applies moderate inflow factors for this demand sector.

Table 10-E.3, below, provides a summary of the City Park resident retail demand upon build-out.

TABLE 10 - E.3 City Park - Resident Retail Demand Upon Build-Out	
Estimated Population	20,826
Est. Avg. Per Capita Income	$59,200
Total Retail Expenditure Potential	$255,840,000
Expenditure Potential by Category	
Food Services & Drinking Places	$47,206,257
Shoppers Goods	$75,201,296
Convenience Goods	$71,342,850
Building Materials	$10,521,667
Sales per Square Foot by Category	
Food Services & Drinking Places	$764
Shoppers Goods	$285
Convenience Goods	$638
Building Materials	$325
Supportable Square Footage by Category	
Food Services & Drinking Places	61,780
Shoppers Goods	263,864
Convenience Goods	111,823
Building Materials	32,374
Non-Retail Space	169,146
Total Supportable Retail Space	**638,995**
Source: US Census of Retail Trade (2022); Dept. of Commerce Consumer Expenditure Survey (2023); ICSC	

In addition to resident demand, additional demand will be driven from the significant number of City Park workers. The key factors driving this model include: 7,844 total workers in retail, office, industrial, household and other sectors. It is very difficult to ascertain the number of workers that will actually live in City Park in the effort to avoid "double" counting these workers as residents. As a topline metric, and based upon US Census On-the-Map (Resident and Worker Inflow/Outflow), the number of workers within the RMA (as discussed above) that both live and work within the area is 37 percent. Utilizing this inflow/outflow factor yields 4,942± net new workers generating retail demand within City Park upon stabilized operations; based upon an International Council of Shopping Center (ICSC Worker Expenditure report issued in 2012, the average worker spends a total of $6,900 on retail goods and services per year. On a conservative basis, the analysis herein considers a 10 percent increase factor; and, average sales per retail type is the same as for the resident model. These assumptions yield $37 million in total annual retail expenditure that, against an average retail sales per square foot of nearly $425, yields more than 88,000 square feet of additional retail demand above resident demand.

In aggregate, retail demand from City Park residents, workers and surrounding area visitors is estimated to total approximately 728,000 square feet of retail demand upon stabilized operations.

Office Demand

The demand for office space is in direct correlation with projected office employment growth. Based upon office market studies completed by the Miami DDA, nearly 80 percent of Miami-Dade County office employment is driven by Finance, Insurance and Real Estate (FIRE) sectors, and Professional, Technical and Business Services (i.e. attorneys, architects, etc.).

Based upon regional office employment projections, in tandem with development and leasing trends, Costar prepares estimates of office employment and office development (gross) over a 10-year period from 2025 to 2035.

TABLE 10 - E.4
Miami-Dade County
Office Space & Employment Projections
(2025-2035)

Total 10 yrs.	
Office Workers	*Bldg. Sq.Ft.*
19,532	6,957,000

Source: Costar

According to Costar, the County currently includes a total 117 million square feet of office space with a vacancy rate of 8.7 precent. City Park's comparable/competitive market (CMA), defined as the area south of SW 88th Street and North of SW 216th Street, includes 10.6 million square feet of office space with a vacancy rate of 5.6 percent. The market's share of County office space is 8.6 percent. During the past 10 years, the CMA has seen 520,000 square feet of office built, with 2 developments (one medical related and one municipal related) containing nearly 50 percent of the new supply.

With 7,800 new homes, combined with nearly 750,000 square feet of retail and 892,000 square feet of industrial space, City Park effectively becomes comparable to a municipality and generates significant internal demand for professional, technical, and financial activities; as well as creating a desirable professional business environment to attract considerable demand in the surrounding CMA. In turn, this master plan helps to cement the CMA's continued capture of the County's future office demand and, likely, increase its share from historical trends. To that, the 500,000 square feet proposed within City Park represents 24 square feet per capita (as referenced above), which is significantly lower than the average office-to-resident ratio of 36 square feet among 12 municipalities in Miami-Dade County with population sizes ranging from roughly 11,000 to 40,000 persons.[§] City Park's 500,000 square feet of office space delivered in the next 10 years is supported.

Industrial

[§] Lambert Advisory Ratio of Office Square Feet to Population – Select Miami-Dade County Municipalities (2022)

The methodology for establishing demand for City Parks 892,484 square feet of industrial space is also associated with industry employment including sectors such as construction, manufacturing, wholesale trade, transportation/warehousing and other related industry.

Based upon regional industrial sector employment projections, along with development and leasing trends, Costar prepares estimates of industrial employment and industrial development (gross) over a 10-year period from 2025 to 2035.

TABLE 10 – E.5
Miami-Dade County
Industrial Space & Employment Projections
(2025-2035)

Total 10 yrs.	
Industrial Workers	*Bldg. Sq.Ft.*
7,391	28,890,000

Source: Costar

According to Costar, the County currently includes a total 262 million square feet of industrial space with a vacancy rate of 6.5 precent. City Park's comparable/competitive market (CMA), defined as the area south of S.W. 88th Street and North of S.W. 216th Street, includes 10.6 million square feet of industrial space with a vacancy rate of 1.2 percent. The market's share of County industrial space is 4.7 percent. However, since 2018, the CMA has seen 2.9 million square feet of industrial development, or an average 446,000 square feet per year. This represents a notably greater 7.0 percent share of the County's demand during the period. To that, and in accordance with County's industrial land absorption analysis,[**] the South (County) Tier is forecast to absorb 10 percent of the overall County's industrial land, which would indicate industrial demand in excess of 2.8 million square feet for the CMA and surrounding market during the next 10 years, and from which City Park's industrial development will capture.

Residential Amenity

As noted in preceding sections, the 7,800 new City Park residences will comprise a mix of households including a measurable number of families. Accordingly, the master plan envisions a considerable amount of open space, and some areas that can be activated with recreation and attractions. Considering this, the City Park DRI contemplates a residential amenity (ie. lagoon water park) for its own residents, as well as the surrounding outside community.

F. Economic Disparity

Job creation has historically been a major challenge for Miami-Dade County as it tries to accommodate the needs of its immigrant population, many of members of which come here for political and familial reasons rather than with knowledge that

[**] Miami-Dade County Projected Absorption of Industrial Land (2025-2040)

employment opportunities exist for them. The City Park DRI will be a benefit to the community in this regard, providing significant numbers of construction jobs during the development period and in excess of 2,500 permanent jobs when completed. The permanent jobs that will exist at the project after it is fully developed will be diverse in terms of the educational and skill levels they will require.

The South Florida Regional Planning Council has established as a goal the elimination of extreme economic disparity among the segments of South Florida's diverse population. The Applicant recognizes that the City Park DRI provides an opportunity to make steps toward the achievement of the Council's goal and will use its best efforts to realize that opportunity.

Construction hiring will likely be the responsibility of many contractors and sub-contractors. The Applicant will encourage the general contractors to award work to minority-owned sub-contractors at significant levels to the extent that doing so does not compromise their ability to complete their segments of the project within budget and in accordance with specifications.

When construction is completed, the responsibility of hiring the on-site workforce will lie with the businesses and institutions that occupy the proposed commercial facilities and that operate its hospital. The Applicant will encourage these businesses to be inclusive in their hiring practices and will use its best efforts to make them aware of the small and minority business resource organizations active in the community.

G. Project Cost

The City Park development is estimated to cost a total of $2.02 billion (in 2025 $'s) inclusive of labor, materials, soft costs, financing, and contingency. It is estimated that approximately 87 percent of the total development expenditure will be spent within the Miami Dade County region.

TABLE 10 - G.1
City Park DRI - Estimate Project Costs[1]
(in Million's of 2025 $'s)

Item	Project Cost	% Spent in Region	Amount Spent in Region
Land	$0	0%	$0
Labor[1]	$779,305	100%	$779,305
Materials[1]	$779,305	80%	$623,444
Interest	$154,291	50%	$77,146
Planning[2]	$77,907	80%	$62,326
Other[3]	$232,198	95%	$220,588
Total	**$2,023,006**	**87%**	**$1,762,809**

Notes:

1.) Includes Furniture, Fixtures & Equipment

2.) Includes fees for architect, engineering, and other consultants

3.) Includes balance of soft costs, development management, TI allowances, pre-marketing expense, permit and impact fees, and contingency

Table 10-G.1, **Project Costs Table**, is presented above. The City Park DRI program will be developed in a single phase during the period between 2026 and 2036. Project costs are dependent on variables pertaining to the individual projects as they are developed. The most significant of these variables is the timing of development during the City Park development period, the scope and location of individual developments and the capital market factors that affect project financing. Therefore, the dollar amounts provided in **Table 10-G.2** are estimates, only, and could vary significantly from the final costs involved in the implementation of City Park.

Table 10.G.2
Project Cost Table
City Park DRI
(in Millions, 2025 Constant $'s)

Single Family	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**Total**
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$7,625,537	$15,251,074	$15,251,074	$22,876,612	$15,251,074	$22,876,612	$7,625,537	$22,876,612	$15,251,074	$7,625,537	$152,510,745
Materials	$7,625,537	$15,251,074	$15,251,074	$22,876,612	$15,251,074	$22,876,612	$7,625,537	$22,876,612	$15,251,074	$7,625,537	$152,510,745
Interest	$1,509,746	$3,019,493	$3,019,493	$4,529,239	$3,019,493	$4,529,239	$1,509,746	$4,529,239	$3,019,493	$1,509,746	$30,194,926
Planning	$762,324	$1,524,649	$1,524,649	$2,286,973	$1,524,649	$2,286,973	$762,324	$2,286,973	$1,524,649	$762,324	$15,246,489
Other	$2,272,071	$4,544,142	$4,544,142	$6,816,212	$4,544,142	$6,816,212	$2,272,071	$6,816,212	$4,544,142	$2,272,071	$45,441,415
Total	**$19,795,216**	**$39,590,432**	**$39,590,432**	**$59,385,648**	**$39,590,432**	**$59,385,648**	**$19,795,216**	**$59,385,648**	**$39,590,432**	**$19,795,216**	**$395,904,320**

Townhome	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
Labor	14,897,499	29,794,999	29,794,999	14,897,499	44,692,498	44,692,498	44,692,498	29,794,999	29,794,999	14,897,499	297,949,985
Materials	14,897,499	29,794,999	29,794,999	14,897,499	44,692,498	44,692,498	44,692,498	29,794,999	29,794,999	14,897,499	297,949,985
Interest	2,949,490	5,898,980	5,898,980	2,949,490	8,848,470	8,848,470	8,848,470	5,898,980	5,898,980	2,949,490	58,989,797
Planning	1,489,302	2,978,604	2,978,604	1,489,302	4,467,906	4,467,906	4,467,906	2,978,604	2,978,604	1,489,302	29,786,040
Other	4,438,792	8,877,584	8,877,584	4,438,792	13,316,376	13,316,376	13,316,376	8,877,584	8,877,584	4,438,792	88,775,837
Total	**$38,672,582**	**$77,345,164**	**$77,345,164**	**$38,672,582**	**$116,017,747**	**$116,017,747**	**$116,017,747**	**$77,345,164**	**$77,345,164**	**$38,672,582**	**$773,451,645**

Multifamily	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
Labor	$7,313,369	$14,626,737	$21,940,106	$7,313,369	$14,626,737	$21,940,106	$21,940,106	$14,626,737	$14,626,737	$7,313,369	$146,267,373
Materials	$7,313,369	$14,626,737	$21,940,106	$7,313,369	$14,626,737	$21,940,106	$21,940,106	$14,626,737	$14,626,737	$7,313,369	$146,267,373
Interest	$1,447,941	$2,895,883	$4,343,824	$1,447,941	$2,895,883	$4,343,824	$4,343,824	$2,895,883	$2,895,883	$1,447,941	$28,958,829
Planning	$731,117	$1,462,234	$2,193,351	$731,117	$1,462,234	$2,193,351	$2,193,351	$1,462,234	$1,462,234	$731,117	$14,622,340
Other	$2,179,058	$4,358,117	$6,537,175	$2,179,058	$4,358,117	$6,537,175	$6,537,175	$4,358,117	$4,358,117	$2,179,058	$43,581,169
Total	**$18,984,854**	**$37,969,708**	**$56,954,563**	**$18,984,854**	**$37,969,708**	**$56,954,563**	**$56,954,563**	**$37,969,708**	**$37,969,708**	**$18,984,854**	**$379,697,083**

Retail/Commercial	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$2,904,901	$2,904,901	$5,809,802	$2,904,901	$8,714,702	$8,714,702	$8,714,702	$8,714,702	$5,809,802	$2,904,901	$58,098,016
Materials	$2,904,901	$2,904,901	$5,809,802	$2,904,901	$8,714,702	$8,714,702	$8,714,702	$8,714,702	$5,809,802	$2,904,901	$58,098,016
Interest	$575,128	$431,346	$862,693	$431,346	$1,294,039	$1,294,039	$1,294,039	$1,294,039	$862,693	$431,346	$8,770,709
Planning	$290,403	$290,403	$580,805	$290,403	$871,208	$871,208	$871,208	$871,208	$580,805	$290,403	$5,808,055
Other	$865,531	$865,531	$1,731,062	$865,531	$2,596,594	$2,596,594	$2,596,594	$2,596,594	$1,731,062	$865,531	$17,310,624
Total	**$7,540,864**	**$7,397,082**	**$14,794,164**	**$7,397,082**	**$22,191,246**	**$22,191,246**	**$22,191,246**	**$22,191,246**	**$14,794,164**	**$7,397,082**	**$148,085,419**

Office	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$2,689,606	$5,379,213	$5,379,213	$5,379,213	$8,068,819	$8,068,819	$8,068,819	$5,379,213	$5,379,213	$53,792,128
Materials	$0	$2,689,606	$5,379,213	$5,379,213	$5,379,213	$8,068,819	$8,068,819	$8,068,819	$5,379,213	$5,379,213	$53,792,128
Interest	$575,128	$532,503	$1,065,007	$1,065,007	$1,065,007	$1,597,510	$1,597,510	$1,597,510	$1,065,007	$1,065,007	$11,225,194
Planning	$0	$268,880	$537,760	$537,760	$537,760	$806,639	$806,639	$806,639	$537,760	$537,760	$5,377,596
Other	$0	$801,383	$1,602,766	$1,602,766	$1,602,766	$2,404,149	$2,404,149	$2,404,149	$1,602,766	$1,602,766	$16,027,661
Total	**$575,128**	**$6,981,979**	**$13,963,958**	**$13,963,958**	**$13,963,958**	**$20,945,937**	**$20,945,937**	**$20,945,937**	**$13,963,958**	**$13,963,958**	**$140,214,706**

Industrial	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$2,896,822	$5,793,643	$5,793,643	$2,896,822	$8,690,465	$8,690,465	$8,690,465	$5,793,643	$5,793,643	$2,896,822	$57,936,431
Materials	$2,896,822	$5,793,643	$5,793,643	$2,896,822	$8,690,465	$8,690,465	$8,690,465	$5,793,643	$5,793,643	$2,896,822	$57,936,431
Interest	$430,147	$1,147,058	$1,147,058	$573,529	$1,720,587	$1,720,587	$1,720,587	$1,147,058	$1,147,058	$573,529	$11,327,195
Planning	$289,595	$579,190	$579,190	$289,595	$868,785	$868,785	$868,785	$579,190	$579,190	$289,595	$5,791,901
Other	$863,124	$1,726,248	$1,726,248	$863,124	$2,589,372	$2,589,372	$2,589,372	$1,726,248	$1,726,248	$863,124	$17,262,478
Total	**$7,376,509**	**$15,039,782**	**$15,039,782**	**$7,519,891**	**$22,559,673**	**$22,559,673**	**$22,559,673**	**$15,039,782**	**$15,039,782**	**$7,519,891**	**$150,254,436**

Farm/Mixed-use	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$0	$1,674,246	$0	$1,674,246	$0	$1,674,246	$0	$1,674,246	$0	$6,696,985
Materials	$0	$0	$1,674,246	$0	$1,674,246	$0	$1,674,246	$0	$1,674,246	$0	$6,696,985
Interest	$0	$0	$331,477	$0	$331,477	$0	$331,477	$0	$331,477	$0	$1,325,906
Planning	$0	$0	$167,374	$0	$167,374	$0	$167,374	$0	$167,374	$0	$669,497
Other	$0	$0	$498,851	$0	$498,851	$0	$498,851	$0	$498,851	$0	$1,995,404
Total	**$0**	**$0**	**$4,346,195**	**$0**	**$4,346,195**	**$0**	**$4,346,195**	**$0**	**$4,346,195**	**$0**	**$17,384,778**

Amenity/Other	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$0	$0	$3,771,350	$0	$0	$2,514,233	$0	$0	$0	$6,285,583
Materials	$0	$0	$0	$3,771,350	$0	$0	$2,514,233	$0	$0	$0	$6,285,583
Interest	$0	$0	$0	$719,086	$0	$0	$479,390	$0	$0	$0	$1,198,476
Planning	$0	$0	$0	$471,419	$0	$0	$314,279	$0	$0	$0	$785,698
Other	$0	$0	$0	$848,554	$0	$0	$565,702	$0	$0	$0	$1,414,256
Total	**$0**	**$0**	**$0**	**$9,581,758**	**$0**	**$0**	**$6,387,838**	**$0**	**$0**	**$0**	**$15,969,596**

PART 2 CONSISTENCY WITH COMPREHENSIVE PLANS

A. Demonstrate how the proposed project is consistent with the local comprehensive plan and land development regulations. Indicate whether the proposed project will require an amendment to the adopted local comprehensive plan, including the capital improvements element. If so, please describe the necessary changes.

The development proposed in the **Master Development Plan, Map H,** will require a Future Land Use Map amendment to the CDMP to modify the Urban Development Boundary and change the land use designation from Agriculture to Special District. In addition, a district boundary change is proposed from Agriculture (AU) to Urban Development Boundary Planned Area Development District (UDBPAD). Applications for such a CDMP amendment and district boundary change have been submitted to the County concurrently with this ADA.

Consistency with County Policy Goals

The proposed **City Park** development is fully aligned with the intent and direction of the CDMP. The project supports a wide range of adopted goals, objectives, and policies related to land use, urban expansion, mobility, housing, economic development, and environmental sustainability. The following narrative outlines how City Park demonstrates consistency with key elements of the CDMP:

Land Use Element
The Land Use Element of the CDMP aims to guide the location, intensity, and character of development to support compact urban form, efficient infrastructure investment, and long-term sustainability. City Park directly supports these goals through its integrated, master-planned design that balances urban development with open space and multimodal transportation

- **Objective LU-1:** *Promote well-designed and efficient land use patterns that support sustainable growth.*

  City Park advances a compact, mixed-use land use pattern that clusters higher intensities around a proposed transit-oriented development (TOD) center and village core. The integration of residential, commercial, civic, educational, and open space uses reduces the need for long vehicle trips and enhances internal trip captured

- **Policy LU-7F:** *Encourage development at transit-supportive densities around existing and planned rapid transit stations.*

  The TOD core planned within City Park is directly adjacent to the CSX Portland Spur, identified as a SMART Plan potential corridor for future transit infrastructure, and is designed to accommodate vertical mixed-use development, multimodal access, and walkability in accordance with the County's transit-oriented development strategies.

- **Policy LU-8F:** *Urban Development Boundary (UDB) should contain land sufficient to accommodate projected residential demand for at least 10 years.*

City Park supports the CDMP's direction to evaluate expansions to the UDB only when necessary to accommodate demonstrated need. The proposal will be accompanied by a Needs Analysis demonstrating that existing capacity is insufficient to meet forecasted residential demand, particularly for workforce and attainable housing within MSA 7.2. The site offers a logical and compact expansion area adjacent to existing infrastructure and development.

- **Policy LU-8G** of the Miami-Dade County Comprehensive Development Master Plan (CDMP) establishes a framework for evaluating proposed expansions of the Urban Development Boundary (UDB). It outlines areas that must be excluded, areas that should be avoided, and priority criteria that should guide the location of future urban development. As demonstrated below, the **City Park** project satisfies all applicable provisions of Policy LU-8G.

  i) Prohibited Areas – Shall Not Be Considered
  Policy LU-8G prohibits consideration of lands within specific environmentally sensitive or infrastructure-protected zones. These include:
  a) The Northwest Wellfield Protection Area and West Wellfield Protection Area
  b) Water Conservation Areas, Biscayne Aquifer Recharge Areas, and Everglades Buffer Areas
  c) The Redland area south of Eureka Drive (SW 184th Street)

  Response: City Park is not located within any of the areas specified in subsections (a), (b), or (c). The site lies well outside the Northwest and West Wellfield Protection Areas, does not intersect with any designated aquifer recharge, buffer, or water conservation areas, and is located north of Eureka Drive, beyond the boundaries of the protected Redland area. Therefore, the **City Park site is eligible for consideration** under LU-8G.

  ii) Areas to Be Avoided
  Policy LU-8G advises that the following areas should generally be avoided for UDB expansions:
  a) Future Wetlands delineated in the Conservation and Land Use Elements
  b) Lands designated Agriculture on the Land Use Plan map
  c) Category 1 Hurricane Evacuation Zones east of the Atlantic Coastal Ridge
  d) Comprehensive Everglades Restoration Plan (CERP) project footprints

  Response:
  - City Park does **not encroach upon Future Wetlands** identified in the CDMP.
  - The site is currently designated **Agriculture** on the Land Use Plan. .
  - City Park is located **west of the Atlantic Coastal Ridge** and **outside of Category 1 Hurricane Evacuation Areas**.
  - The site is **not located within the footprint** of any CERP project as defined in Tentatively Selected Plans or Project Implementation Reports.

  iii) Priority Areas for Inclusion
  Policy LU-8G establishes specific priority criteria for areas considered most appropriate for UDB expansion:
  a) Lands within Planning Analysis Tiers with the earliest projected supply depletion year

b) Lands contiguous to the UDB
c) Locations within one mile of a planned Urban Center or extraordinary transit service
d) Locations with projected surplus service capacity or where public facilities can be readily extended

Response:

- **Planning Analysis Tier:** City Park is located within Miami-Dade County's South-Central Planning Analysis Tier, a tier historically identified as having among the earliest projected urban land-supply depletion and where current County and independent analyses show constrained remaining supply for key land uses. The Applicant's Needs Assessment documents that (a) County projections indicate single-family land capacity is projected to be depleted countywide by 2029 (creating a shortfall for single-family/townhome product), and (b) the South-Central Tier has very limited remaining industrial and commercial land and is projected by County staff to face industrial depletion in the Tier by the early 2030s. These findings demonstrate that City Park sits within a Planning Analysis Tier with demonstrated early depletion of key land supplies and therefore meets LU-8G(iii)(a)'s priority criterion for UDB consideration.

- **Contiguity with the UDB:** The eastern boundary of City Park is **directly contiguous to the current UDB**, making it a logical extension and minimizing sprawl.

- **Transit Access:** City Park is located within one mile of the potential SMART Plan CSX Portland Spur corridor, identified as a potential candidate for future transit infrastructure. The project includes a **Transit-Oriented Development (TOD) Center**, further enhancing alignment with County mobility goals.

- **Infrastructure Extension Feasibility:** The area **immediately east of City** Park is already served by public water, sewer, and transportation infrastructure. The Applicant is actively coordinating with utility and public service providers to extend facilities in a phased, efficient manner, ensuring consistency with concurrency and infrastructure planning standards.

In summary, based on the criteria outlined in **CDMP Land Use Policy LU-8G**, City Park is a **strong candidate for inclusion** within the Urban Development Boundary. The project:

- **Avoids prohibited and environmentally sensitive areas**
- **Responds to long-acknowledged growth pressure in a transitional agricultural zone**
- **Meets multiple priority criteria**, including contiguity, transit proximity, and tier designation
- **Advances compact, resilient, and integrated land use consistent with the CDMP's goals for urban form**

As such, City Park demonstrates clear consistency with LU-8G and represents a strategically located and appropriately planned expansion of the urban footprint in Miami-Dade County.

- **Urban Form Guidelines:** The CDMP outlines that new development should reinforce community identity, reduce sprawl, support multimodal transportation, and optimize the use of public infrastructure. City Park embodies these principles through its integrated land use plan, hierarchical street network, and strategic allocation of densities and intensities.

  1. **Compact, Mixed-Use Development Pattern -** City Park is designed around a **compact urban structure** that clusters **higher-intensity, mixed-use development** within a central Village Core and transit-oriented development (TOD) node. This core accommodates vertical mixed-use buildings, civic spaces, and commercial amenities within walking distance of residential neighborhoods. The plan supports internal trip capture and reduces reliance on external roadways, consistent with CDMP policies encouraging efficient land use patterns (e.g., Policy LU-1G).

  2. **Hierarchical and Connected Street Network -** The project features a **fine-grained, interconnected street grid** with clearly defined block sizes, promoting walkability and efficient access to transit, parks, and civic uses. The road network is structured to prioritize **multimodal transportation**, including transit routes, bikeways, and pedestrian paths. This aligns with the CDMP's urban design guidance, which calls for development forms that promote accessibility, reduce vehicle miles traveled (VMT), and encourage active transportation.

  3. **Transitions in Scale and Intensity -** City Park provides a calibrated **transition in density and intensity** from the TOD and Village Core outward to medium- and low-density residential neighborhoods near the project's perimeter. This structure ensures compatibility with adjacent uses and provides a diverse housing mix while maintaining the urban design principle of focusing intensity around nodes and corridors. The plan adheres to the CDMP guideline to establish legible and functionally coherent urban form that reinforces local context.

  4. **Integration of Open Space and Civic Uses -** The City Park plan distributes approximately **250 acres of lakes, parks, greenways, and civic spaces** throughout the site. These spaces are not isolated but are integrated into the community's layout to serve both ecological and social functions. Civic uses—including schools, plazas, and government facilities—are embedded within the walkable core and neighborhood units, in line with CDMP recommendations for integrating public uses into urban form.

  5. **Urban Form Supports Resiliency and Sustainability -** The compact form, coupled with climate-adapted landscaping, stormwater-integrated green infrastructure, and neighborhood-scaled agriculture, reflects an urban structure that is resilient to climate change and environmental stressors. The integration

of these features is consistent with the County's **Resilient305** goals as referenced in the CDMP and supports urban form that is future-ready.

The City Park development is consistent with the Land Use Element's guidance on urban form in the CDMP. It advances the County's goals by creating a complete, integrated, and walkable community that strategically allocates intensity, promotes multimodal accessibility, and reinforces sustainable development patterns. As such, City Park exemplifies the type of form-based, context-sensitive growth envisioned in Miami-Dade County's long-range planning framework

Housing Element
The Housing Element promotes the availability of safe, affordable, and accessible housing for all income levels. City Park addresses workforce housing needs by committing to a mix of housing types and long-term affordability near jobs and transit.

- **Goal H-1:** *Provide a sufficient supply of affordable and workforce housing.*

  City Park includes a commitment to develop a minimum of 12.5% of residential units as attainable housing serving workforce income households. These units will be dispersed throughout the development, ensuring access to transit, jobs, schools, and amenities, and will remain affordable for a minimum of 30 years.

- **Policy H-2A:** *Promote housing opportunities in proximity to employment centers and transportation corridors.*

  The location of City Park near regional roadways, planned transit infrastructure, and designated employment zones makes it well suited to deliver housing aligned with job access and regional mobility goals.

Transportation Element
The CDMP Transportation Element emphasizes the development of a multimodal network that reduces car dependency and supports land use efficiency. City Park integrates transit-ready development and a walkable street network to advance these mobility objectives.

- **Objective TE-1:** *Develop an integrated, multimodal transportation system.*

  City Park includes a multimodal transportation network with complete streets, shared-use paths, and connectivity to existing and future regional corridors. The development framework is consistent with the County's Mobility Element and supports internal circulation while enhancing external regional access.

- **Policy TE-1F:** *Encourage developments that reduce automobile dependency and increase transit ridership.*

  The project's TOD node, walkable design, and mix of uses reduce the need for external vehicle trips, support transit ridership, and enable mode shift. A planned mobility hub will accommodate buses, shuttles, micromobility, and potential rail connections.

Recreation and Open Space Element

This element seeks to ensure equitable access to parks and recreational amenities. City Park exceeds minimum open space requirements and distributes parks and greenways throughout the community.

- **Objective ROS-2:** *Ensure sufficient access to parks and recreational facilities for all residents.*

  City Park advances ROS-2 by delivering a parks and open-space network sized and placed to serve the projected population and to provide equitable access:
  - **Projected population & LOS requirement.** At buildout City Park is projected to house **20,826 persons** (7,800 units × 2.67 persons/unit). At the County LOS of **2.75 acres / 1,000 residents**, the LOS requirement equals **57.27 acres**.
  - **Credited open space (conservative treatment).** The master plan provides **249.5 acres** of total open space. Per County practice, **66.0 acres** of stormwater lakes are excluded from private LOS credit unless formally dedicated and accepted as public parkland; excluding those lakes yields **183.5 acres** of credited open space.
    - **Surplus (conservative):** 183.5 − 57.27 = **126.23 acres** above LOS (**≈ 3.20×** the County minimum).
    - **Per-person provision (conservative): ≈ 384 sq ft / person**.
  - **Equitable access & distribution.** The open-space framework places parks, pocket parks, neighborhood greens and the Central Greenway so that all residential neighborhoods are within a short walk of an accessible public space. A graded hierarchy (village parks, neighborhood parks, pocket parks, greenway corridors and school/playfield sites) ensures active facilities (fields, courts, playgrounds) and passive spaces (plazas, trails, habitat buffers) are geographically distributed to meet diverse user needs.

  These results demonstrate that, on a conservative basis consistent with County policy, City Park exceeds ROS-2 requirements by a substantial margin and provides geographically equitable access.

- **Policy ROS-2B:** *Design neighborhoods to integrate parks and public spaces.*

  City Park follows ROS-2B through urban-design measures that make public space an organizing principle:
  - **Parks as neighborhood anchors.** Each neighborhood unit is centered on or framed by a neighborhood park, civic green or plaza that provides play space, social gathering areas and active programming opportunities.
  - **Village Core integration.** The Village Core places civic greens, a market plaza and higher-intensity parks within walking distance of mixed-use and higher-density housing, supporting daily uses and community events.
  - **Greenway & trail connectivity.** The Central Greenway links parks, schools, the Farm and the Village Core with continuous Class I trails, providing safe, non-motorized access and enabling routine recreation without auto dependence.
  - **Multi-functional design.** Open spaces are sized and designed to perform multiple roles—recreation, stormwater management, heat-island mitigation and habitat connectivity—consistent with integrated ROS policy objectives.

  .

Capital Improvements Element

The Capital Improvements Element focuses on ensuring that development is adequately supported by infrastructure without reducing Level of Service (LOS) standards. City Park is phased and planned to coordinate with infrastructure investment and capacity.

- **Objective CIE-1:** *Coordinate land development with the provision of infrastructure.*

  City Park will be developed in coordination with available infrastructure capacity and phased improvements. Water, sewer, and roadway capacity assessments are being conducted to ensure concurrency and avoid adverse impacts on Level of Service (LOS) standards.

Conservation, Aquifer Recharge, and Coastal Management

These CDMP elements promote environmental protection and adaptation to climate change. City Park is designed to incorporate environmental best practices, including green infrastructure and heat mitigation.

- **Objective CON-5:** *Protect and enhance environmentally sensitive areas and recharge zones.*

  The site design avoids sensitive natural areas and enhances stormwater management through interconnected lakes, bioswales, and greenways. The development includes substantial green infrastructure and applies low-impact development techniques to reduce runoff and improve aquifer recharge.

- **Policy CM-8B:** *Reduce urban heat island effects through planning and design.*

  The site incorporates shade trees, green roofs, and compact development to mitigate heat effects. Landscape design prioritizes climate-adapted species and high-albedo materials in accordance with the County's **Resilient305** principles.

Conclusion
The City Park development represents a model for compact, resilient, and mixed-use growth aligned with the long-term vision and regulatory framework of the CDMP. The project satisfies applicable Goals, Objectives and Policies across multiple CDMP elements and demonstrates a strong commitment to housing affordability, transportation integration, climate adaptation, and efficient urban form. It supports the County's overarching goal to manage growth responsibly, expand access to opportunity, and improve quality of life for future residents

B. Describe how the proposed development will meet goals and policies contained in the appropriate Regional Comprehensive Policy Plan.

The proposed **City Park Development of Regional Impact (DRI)** is fully consistent with the Goals, Strategies, and Policies of the **Strategic Regional Policy Plan (SRPP) for South Florida**, as adopted by the **South Florida Regional Planning Council (SFRPC)**. The SRPP provides a regional framework to guide land development,

infrastructure investment, environmental protection, and economic growth in Miami-Dade, Broward, and Monroe Counties. City Park directly supports the Plan's overarching goals of sustainable, compact, and coordinated regional development.

The following narrative outlines how City Park demonstrates consistency with major elements of the SRPP:

1. Livable Communities and Regional Planning

SRPP Goal: Promote compact, livable, and well-connected communities through coordinated regional planning.

City Park exemplifies livable community design through its integration of **residential, commercial, civic, educational, and open space uses** into a walkable, transit-ready framework. The project clusters higher-intensity development around a potential SMART Plan transit node (CSX Portland Spur) and features a street network that supports **multimodal access**, neighborhood connectivity, and public space integration.

By applying principles of **urban form, placemaking, and mixed-use development**, City Park supports the SRPP's regional vision for well-planned, self-contained growth that minimizes sprawl and strengthens the structure of the urban region.

2. Transportation and Mobility

SRPP Goal: Develop a safe, efficient, and interconnected multimodal transportation system.

City Park is planned in coordination with the **SMART Plan** and includes a **transit-oriented development (TOD) center** adjacent to the CSX corridor, which is recognized as a future strategic rail corridor in Miami-Dade County. The site incorporates a **mobility hub** designed to accommodate transit vehicles, micromobility, and pedestrian connections. A complete street network and trail system further promote reduced automobile dependency and alignment with **regional mode shift** strategies.

These mobility features directly support the SRPP's objectives to reduce vehicle miles traveled (VMT), increase transit ridership, and provide access to alternative transportation modes within a compact urban form.

3. Affordable and Workforce Housing

SRPP Goal: Ensure an adequate supply of housing for all income levels, with emphasis on workforce housing near employment and transit.

City Park addresses the region's pressing housing needs by committing to provide **a minimum of 12.5% of residential units as workforce or attainable housing**. These units will be integrated throughout the development and located near transit, schools, parks, and employment uses—consistent with SRPP priorities to enhance

housing access and reduce commuting burdens for low- and moderate-income households.

This housing strategy helps mitigate the affordability crisis in South Florida while contributing to **equitable regional growth** and housing-job-transit alignment.

4. Economic Development

SRPP Goal: Promote a diverse, competitive, and sustainable regional economy.

City Park supports long-term regional economic development by incorporating **over 2 million square feet of commercial and employment-generating space**, including retail, office, and educational. The project is expected to generate significant construction and permanent jobs, while supporting business creation and entrepreneurship in a planned village environment.

Additionally, the inclusion of a **Farm District** and local food production supports innovation in food systems and emerging agricultural models, contributing to the regional economy's diversification and resilience.

5. Natural Resources and Environmental Resilience

SRPP Goal: Protect and enhance natural systems, improve regional resilience, and adapt to climate change.

City Park integrates environmental resiliency throughout its master plan, including:

- **250 acres of interconnected greenways, parks, and lakes**
- **Stormwater systems** that support aquifer recharge and flood protection
- **Urban agriculture** that promotes food resiliency
- **Heat island mitigation** via compact form, tree canopy, and shaded streetscapes

The project aligns with the County's **Resilient305** strategy, which is supported by the SRPP, and demonstrates consistency with regional adaptation goals related to climate risk, ecosystem connectivity, and green infrastructure.

6. Regional Coordination and Efficient Growth Management

SRPP Goal: Encourage coordinated growth that optimizes existing infrastructure and limits urban sprawl.

City Park represents an opportunity for **planned expansion** adjacent to the current Urban Development Boundary (UDB), leveraging proximity to existing roads, utility corridors, and transit planning initiatives. The project is supported by **infrastructure analysis** to ensure concurrency with public services and regional systems.

This approach supports the SRPP's guidance for compact, infrastructure-efficient development and enhances the logical structure of the regional urban form.

Conclusion

The City Park DRI is consistent with the Strategic Regional Policy Plan for South Florida in both intent and execution. By integrating land use, transportation, housing, environmental design, and economic development within a coordinated framework, City Park fulfills the SRPP's vision for sustainable, equitable, and resilient regional growth. It represents a model for master-planned development that advances long-range planning goals across jurisdictional and policy boundaries in South Florida.

C. Describe how the proposed development will 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.

The **City Park Development of Regional Impact (DRI)** is consistent with the goals and policies of the **State Comprehensive Plan (SCP), Chapter 187, Florida Statutes**, which establishes long-range goals and policies to guide the development of Florida's economy, infrastructure, environment, and communities. The project furthers the State's objectives by promoting orderly, sustainable, and resilient growth across a full range of planning categories. The following narrative summarizes how City Park aligns with key goals of the SCP:

1. Housing (§ 187.201(7), F.S.)

State Goal: Provide adequate and affordable housing for all Floridians.

City Park directly advances the state's housing goal by providing a **diverse mix of housing types**, including a formal commitment that **at least 12.5% of residential units will be designated as attainable/workforce housing**. These units will be integrated within walkable neighborhoods and located near employment centers, schools, transit facilities, and civic spaces. The project supports regional housing equity and affordability, especially for households traditionally underserved by the private market.

2. Water Resources (§ 187.201(8), F.S.)

State Goal: Assure the availability of an adequate supply of water for all competing uses.

City Park is planned to support efficient use of water resources by incorporating **climate-adapted landscaping**, **low-impact development (LID) techniques**, and **integrated stormwater management systems** that improve infiltration, aquifer recharge, and water quality. Stormwater lakes and greenways serve dual purposes for flood control and open space, consistent with State guidance on sustainable water infrastructure.

3. Natural Systems and Recreational Lands (§ 187.201(9), F.S.)

State Goal: Ensure the preservation and protection of natural systems and the public's access to natural and recreational lands.

City Park preserves and enhances ecological function through the inclusion of **250 acres of parks, greenways, and lakes**. These lands are designed to support habitat connectivity, public access, and passive and active recreation. Additionally, the project employs **native plantings**, bioswales, and open space corridors to maintain ecosystem services and mitigate development impacts.

4. **Land Use (§ 187.201(15), F.S.)**

   State Goal: Promote orderly and balanced land use patterns that reduce sprawl and protect natural resources

   .

   The project embodies the State's land use goals through a **compact, mixed-use urban form** that clusters development around a planned transit hub and concentrates density in a walkable Village Core. City Park supports a **logical expansion of the Urban Development Boundary (UDB)** by efficiently utilizing infrastructure and avoiding leapfrog development. It advances a well-planned community structure with transitions in scale, multimodal connectivity, and integration of jobs, housing, and services.

5. **Public Facilities (§ 187.201(17), F.S.)**

   State Goal: Plan, finance, and develop public facilities in a timely, orderly, and efficient manner.

   City Park is being planned in coordination with **available and expandable infrastructure**, including water, wastewater, roads, and stormwater systems. The development will comply with concurrency and capacity requirements, and its phasing strategy ensures that facilities are available to serve each stage of growth. The project's integrated infrastructure approach supports efficient service delivery and cost-effective public investment.

6. **Transportation (§ 187.201(18), F.S.**

   State Goal: Ensure that the State has a safe, interconnected transportation system that supports economic growth and mobility.

   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.

7. **Agriculture (§ 187.201(23), F.S.)**

   State Goal: Protect agricultural lands and promote a sustainable agricultural economy.

   City Park is proposed on land historically used for low-yield row crop production, a sector of agriculture that has seen **diminishing economic viability** in Miami-Dade

County. As documented in recent County and State analyses—including those prepared by the University of Florida—the long-term outlook for farmland demand reflects a **continuing downward trend**.

Indeed, the **University of Florida report indicates that demand for farmland overall is expected to decrease** from **68,837 acres in 2022 to 56,284 acres in 2050**, representing a **reduction of more than 12,000 acres**. Compared to the 68,837 acres reported in the 2022 Census of Agriculture, **projected demand for farmland by 2030 will decline by over 4,000 acres**, with another **4,000-acre decline expected by 2040**. In this context, a **1,000-acre development—even one located outside the Urban Development Boundary (UDB)**—can proceed **without materially impacting the County's agricultural economy**.

Furthermore, Miami-Dade County's agricultural sector is increasingly centered on **nursery and floriculture production**, which now accounts for the **majority of agricultural sales despite using only a fraction of total farmland**. These high-value agricultural activities are typically conducted on **smaller parcels with more intensive production**, often closer to infrastructure and logistics networks. As such, the long-term agricultural sustainability of the County is not dependent on preserving all existing row crop acreage but rather on encouraging a shift toward **consolidated and intensified high-value agriculture** in appropriate areas.

The inclusion of a **Farm District** within the City Park development further supports this evolution by promoting **community-scale agriculture, food education, and local resiliency**, consistent with State goals to protect agricultural integrity while fostering innovative practices.

In summary, the County's agricultural future lies in embracing **nursery and floriculture as its dominant agricultural engine**. A **carefully sited, mixed-use project** of the size and structure proposed at City Park will not erode Miami-Dade's agricultural capacity. On the contrary, by **facilitating strategic land-use shifts** toward more viable agricultural uses and freeing up less productive land for urban development, the project can help preserve both **economic vitality** and **farmland integrity** across the County—fully in alignment with the State Comprehensive Plan's goals

Conclusion

The City Park project demonstrates strong consistency with the goals of the **SCP** Through compact urban design, infrastructure efficiency, housing affordability, environmental resilience, and regional mobility integration, the project addresses the State's highest priorities for responsible growth and community development. It represents a forward-looking model for urban expansion that supports long-term sustainability, equity, and economic prosperity across South Florida.

Chapter 9J-5 of the Florida Administrative Code defines how development programs should be judged to determine whether they are proliferating sprawl in regard to comprehensive plan amendments. City Park has been designed as a compact, mixed-use, and transit-supportive development that aligns with the State's goals for managing growth. The following analysis responds to each of the 13

indicators of urban sprawl defined in the Florida Administrative Code, demonstrating how **City Park avoids the proliferation of sprawl**:

1. **Leapfrog Development Patterns**

   Indicator: Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development in a pattern that fails to maximize the use of existing public facilities or infrastructure.

   Response: City Park does **not represent leapfrog development**. It is a **contiguous expansion** adjacent to the Urban Development Boundary (UDB) and leverages proximity to existing or planned infrastructure, including regional roadways and the SMART Plan corridor. The development is **phased and designed for infrastructure efficiency**, avoiding scattered, premature expansion.

2. **Strip Commercial Development**

   Indicator: Promotes, allows, or designates development in a strip commercial pattern.

   Response: City Park avoids strip commercial patterns by concentrating commercial uses within a **central Village Core** and **TOD center**, with a hierarchy of **complete streets and pedestrian-oriented blocks**. Retail and services are **integrated into mixed-use buildings**, consistent with form-based principles, rather than isolated along linear corridors.

3. **Isolated, Low-Density Residential**

   Indicator: Results in isolated, disconnected, and low-density development patterns.

   Response: The master plan promotes **connectivity and integration**. Residential neighborhoods are **linked by a multimodal street network**, civic uses, schools, parks, and shared open space. Higher densities are focused near transit, with **gradual transitions** to lower-intensity housing, avoiding disconnected pockets of development.

4. **Discourages Infill or Redevelopment**

   Indicator: Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.

   Response: City Park complements—rather than competes with—urban infill. The project addresses the regional need for additional residential and mixed-use capacity and supports County goals for urban redevelopment and strategically planned growth at the edge of the UDB. It also aligns with long-term transit-oriented development (TOD) planning that can catalyze reinvestment in adjacent areas.

City Park will not discourage infill or neighborhood revitalization. The site is contiguous to urbanized areas and planned as a compact, mixed-use community organized around a TOD node, with internal retail and services and a connected street–trail–open-space network that supports internal trip capture. The project delivers **5,561** attached and detached single-family homes within a transit-ready, walkable framework.

Within the UDB, current land supply has capacity for **~20,000** single-family dwellings, while annual demand exceeds **5,000** single-family units—exhausting single-family capacity in **fewer than four years**. By meeting a significant share of this near-term need adjacent to existing infrastructure, City Park complements—instead of diverting from—infill and redevelopment efforts

5. **Promotes Auto-Dependency**

   Indicator: Promotes, allows, or designates development that fails to adequately protect natural resources and environmental systems.

   Response: City Park's design **reduces auto-dependency** through a **multimodal transportation framework**. The street grid supports **transit access, bike lanes, sidewalks**, and a **mobility hub** at the TOD center. Land uses are clustered to promote **internal trip capture**, enabling residents to meet daily needs without relying on personal vehicles.

6. **Fails to Protect Environmentally Sensitive Areas**

   Indicator: Results in the loss or degradation of natural resources or valuable ecosystems.

   Response: The development area does **not include listed environmental conservation lands**, wetlands, or core habitat. The project includes approximately **250 acres of lakes, greenways, and parks**, integrated with **stormwater management** and native plantings to enhance environmental function and improve water quality.

7. **Incompatible Land Uses**

   Indicator: Results in development that is not functionally related to surrounding uses.

   Response: City Park is **functionally integrated with surrounding uses**. Adjacent land includes utility corridors, transportation infrastructure, and transitioning urban edge conditions. The development provides **graduated densities and buffer areas** along its perimeter to ensure compatibility with existing uses and planned regional infrastructure.

8. **Disproportionate Infrastructure Cost**

   Indicator: Requires the public to bear disproportionately high costs to provide services.

Response: City Park will be supported by **existing and programmed infrastructure** and includes a **phased development approach** to ensure concurrency. All improvements (e.g., water, sewer, stormwater, roads) will be **privately funded or coordinated with programmed capital improvements**, preventing public cost burdens.

9. Fails to Support Regional Objectives

Indicator: Fails to encourage a functional mix of uses and compact, energy-efficient development patterns.

Response: City Park is **designed around energy-efficient and compact development patterns**, supporting the objectives of the **State Comprehensive Plan**, **Resilient305**, and the **South Florida Strategic Regional Policy Plan**. The land use plan integrates housing, jobs, schools, transit, and open space in a **cohesive urban framework**.

10. Inefficient Land Use Patterns

Indicator: Fails to maximize the use of existing public facilities or leads to inefficient land consumption.

Response: The project's **compact form and vertical mixed-use development** maximize the use of land and minimize urban footprint. Infrastructure is **clustered, shared, and connected**, and the site utilizes land previously in marginal agricultural use, reducing pressure on higher-value conservation or rural lands.

11. Loss of Rural or Agricultural Character Without Justification

Indicator: Converts significant rural or agricultural land uses to urban without demonstrated need.

Response: Rather than indiscriminately urbanizing rural land, City Park is a **contiguous, compact, mixed-use** expansion that meets housing and employment needs, **preserves a quarter of the site as open space**, limits impacts to the County's strategic agricultural base, and is designed around **transit and resilience**. This is the opposite of converting rural land "without demonstrated need.

12. Premature Development

Indicator: Allows premature conversion of rural land to urban without phasing or infrastructure planning.

Response: City Park includes a **development program**, aligned with infrastructure capacity, concurrency requirements, and long-range planning. It is **not premature**, but instead strategically timed to meet documented growth needs.

13. Lack of Intergovernmental Coordination

Indicator: Fails to coordinate with regional or local government agencies.

Response: The project has involved **early and ongoing coordination** with Miami-Dade County agencies, the South Florida Regional Planning Council, FDOT, and utility providers. The planning process incorporates feedback from regional reviews and aligns with broader **SMART Plan**, **CDMP**, and **resiliency strategies**.

In conclusion, City Park meets all requirements for consistency with Florida's anti-sprawl policies under **Chapter 9J-5 / Rule 73C-40.025, F.A.C.** Its **location, design, infrastructure planning, and land use integration** demonstrate a clear commitment to smart growth, sustainability, and long-term regional benefit. The project serves as a model for managed, efficient urban expansion in South Florida

PART 3 DEMOGRAPHIC AND EMPLOYMENT INFORMATION

A. Complete the following demographic and employment information tables.

Project Demographics

The proposed City Park development program provides for a maximum development of 7,800 residential units and generally comprising: *Low Density* housing representing 1,029 single family homes with an average density of 6 units per acre; *Moderate Density* housing representing 4,532 townhome units with an average 18 units per acre; and, *High Density* housing 2,239 multi-family units at an average 30 units per acre. The majority of the *low and moderate density* housing will be homeownership (for-sale) product and the high-density properties will be rental.

The prospective City Park housing is anticipated to attract a mix of residents. It is expected that the single-family homes will be dominated by families, while the townhome will potentially be a more balanced mix of families and single or couple occupants. The rental product will be geared more to single and double occupancy, with family in the larger units. City Park's housing will support workers within the City Park community, as well as attract a significant number of new residents from outside of the community and south Dade County region at large. **Table 10-Part III.1, Population and Demographic Information**, provides a breakdown of population and demographic components for the prospective housing development.

Table 10-Part III.1
Project Demographics

	Total Units / Dwelling						*Total School*		
Phase	*LDR (SF)*	*MDR (TH)*	*HDR (MF)*	*Persons/HH*[1]	*Total Population*	*Children/HH*[2]	*Aged Children*[3]	*Elderly/HH*[4]	*Total Elderly*
City Park	1,029	4,532	2,239	2.67	20,826	0.39	3,041	0.45	3,499

Notes/Sources:

1.) ACS 2023

2.) ACS 2023 - MDC Population age under 18 (20.1% of total population)

3.) ACS 2023 - MDC Population age cohort between 5 and 17 years (14.6% of total population)

4.) ACS 2023 - MDC Population age cohort 65 years and older (16.8% of total population)

Project Employment

Direct Construction jobs (also referred to as short-term, non-recurring) created from the development of City Park will total roughly 12,674 FTE's during the City Park development phase 2036. This is based upon development costs (construction) of roughly $2.0 billion and enumerated through the IMPLAN model. Development of the City Park master plan will create more than 7,844 Direct Long-term Recurring FTE's related to industrial/office/retail employment, property and building management, maintenance, security, administrative, executive, among other occupations – and the

detail of which is discussed in Question 24 (Housing). The following table provides a summary of Direct Construction and Direct Recurring jobs by income category.

TABLE 10 – Part III.2
City Park - Direct Construction and Direct Recurring (Non-Construction) FTE Jobs by Income Cohort

Phase	< $27,600*	$27, 601 - $43,600	$43,601 - $69,760	$69,761 $104,640	> $104,640	Total
Construction**		1,014	2,788	7,731	1,141	12,674
Non-Construction		2,179	1,460	3,395	809	7,844

Source: USHUD; Lambert Advisory; IMPLAN

Notes:
* Minimum Wage

** Employment distribution by Income Cohort based upon "Industrial" sector control method detailed in Q24 (Housing)

Table 10-Part III.3, Estimated Employment by Income Range and Land Use, provides a distribution of these workers by income. The income categories shown are those used in the Housing (Question 24) Methodology utilized in the affordable housing analysis.

TABLE 10 – Part III.3
City Park - Employment by Land Use and Income Cohort

Phase	$27, 601 - $43,600	$43,601 - $69,760	$69,761 `$104,640	> $104,640	Total
Retail	1,716	690	240	79	2,724
Office	44	342	2,317	917	3,621
Industrial	91	251	690	109	1,141
Education	30	30	147	150	358
Total	**1,881**	**1,313**	**3,395**	**1,255**	**7,844**

Source: USHUD; Lambert Advisory

The employment identified in the table above (both construction and non-construction related) represents direct project-based employment; as such, it does not account for indirect employment that will create significant job opportunities throughout Miami-Dade County.

PART 4 IMPACT SUMMARY

A. Summarize the impacts this project will have on natural resources.

Vegetation and Wildlife

The Project Site contains no significant vegetation or wildlife features. Further, the Project Site provides no significant habitat for any listed wildlife or plant species.

Wetlands

There are no wetlands currently on the site.

Project Development

The proposed Project will result in extensive landscaping along road rights-of-way, in public plazas and adjacent to structures. Therefore, the impact on any adjacent resources will be significantly improved.

B. Summarize public facilities capital costs associated with project impacts using the following table:

TABLE 10.6
PUBLIC FACILITIES CAPITAL COSTS

Facility	Total Capital Costs	Responsible Entity
Transportation (External)	Fair Share cost to be determined	State of Florida, Miami-Dade County
Wastewater	Equal to connection charges collected.	Miami-Dade Water & Sewer
Potable Water		
Recreation/Open Space	None anticipated, facilities to be provided by developer	Miami-Dade County
Education	None anticipated, facilities to be provided by developer	Miami-Dade County Public Schools

Source: The Curtis Group