20. SOLID WASTE/HAZARDOUS WASTE

A. Provide a projection of the average daily volumes of solid waste generated at the completion of each phase of development. Use the format below and identify the assumptions used in the projection.

Table 20-1, Projected Solid Waste Generation, presents the estimated average daily solid waste volumes anticipated at project buildout. Upon full completion of City Park, the development is projected to generate approximately 506 cubic yards per day (CYD), or 62 tons per day (TPD). Although City Park is not located in Broward County, the solid waste generation rates were derived from the Broward County Comprehensive Plan Solid Waste Element, as these are the only formally published and adopted generation rates currently available. Miami-Dade County does not publish comparable generation factors by land use type, making Broward's publicly available standards the most authoritative and defensible reference for estimating projected generation.

TABLE 20-1 CITY PARK									
PROJECTED SOLID WASTE GENERATION									
Land Use	Intensity of	Generation Rate ¹	Solid Waste Generation ²						
	Use	(lbs/unit/day)	lbs	CFT	CYD	TPD			
Residential ¹									
Single Family	5,561 du	8.9	49,493	5,508	204	25			
Multi-Family	2,239 du	8.9	19,927	2,214	82	10			
Commercial ²									
Retail	749,153 sf	4 lbs per 100 sf	29,966	3,321	123	15			
Office	500,000 sf	1 lbs per 100 sf	5,000	540	20	2.5			
Industrial	892,484 sf	2 lbs per 100 sf	17,850	1,971	73	9			
Schools									
Elementary	1,011 Students	0.25 lbs per student	253	28	1	0.12			
Middle	1,222 Students	0.25 lbs per student	306	34	1	0.15			
High	1,630 Students	0.25 lbs per student	408	45	2	0.20			
Total Proposed Generation			118,703	13,661	506	62			
Source: The Curtis Group									

¹ Based on the adopted Broward County Comprehensive Plan Solid Waste Element

B. 1. Please specify the extent to which this project will contain laboratories, storage facilities, and warehouse space where hazardous materials may be generated or utilized. What types of hazardous waste or toxic materials are likely to be generated? Will a hazardous materials management plan be prepared covering all uses of hazardous materials on-site? If so, please discuss contents and enforcement provisions.

² The following conversion rates were used:

¹ cubic foot = 9 lbs of waste

¹ cubic yard = 27 cubic feet

¹ cubic yard = 9 lbs times 27 cubic feet = 243 lbs

¹ ton = 2,000 lbs = 8.23 cubic yards

None of the uses included within City Park are expected to contain hazardous wastes

2. Please discuss what measures will be taken to separate hazardous waste from the solid waste stream. What plans and facilities will be developed for hazardous or toxic waste handling, generation, and emergencies?

To the extent that hazardous materials usage on the Project Site will have a "significant hazardous material usage impact", hazardous waste will be separated from the solid waste stream by implementing the "point of origin" disposal method as required by Rule 10D-104 Florida Administrative Code.

3. Please identify off-site disposal plans for hazardous waste generated by this development and provide assurance of proper disposal by a qualified contractor.

To the extent that hazardous materials usage on the Project Site will have a "significant hazardous material usage impact", the applicant will prepare and submit a Hazardous Materials Management Plan or restrictive covenant in accordance with the requirements of Rule 9J-2.044(5)(b)(1) and (2) of the Florida Administrative Code.

4. What local and state regulations, permits and plans will regulate the generation and handling of hazardous waste at this development?

The Applicant, its successors or assigns, will comply with all legislation governing hazardous waste generation and handling. The handling and generation of any hazardous waste will be regulated by the U.S. Environmental Protection Agency and other local, state and federal agencies. If dry cleaning facilities are included as part of the Project, special rules (Chapter 62-781, F.A.C.) apply. Chapter 62-761, F.A.C., will apply in the unlikely event that a gasoline station or other petroleum storage facility is included in the Project.

Hazardous waste generation and handling are regulated by Chapter 24 of the Miami-Dade County Code.

- C. For all waste disposal planned (on or off site), attach a copy of the letter from the developer describing the types and volumes of waste and waste disposal areas requested, and attach a letter from the agencies or firms providing services outlining:
 - 1. the projected excess capacity of the facilities serving the development 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 agency's or firm's ability to provide service at all times during and after development (the agency or firm must be supplied with the solid waste generation table in (A) above).

On-site disposal of solid waste is neither planned nor anticipated for the Project. Exhibit 20-1, Letters to and from Miami-Dade County Department of Solid Waste Management, will include a letter requesting an indication of the ability and capacity of the department to provide solid waste services for the proposed Project. A response from Miami-Dade County Department of Solid Waste Management indicating their ability to provide service to the project will be included as soon as it is received.

EXHIBIT 20-1 Letters to and from Miami-Dade County Department of Solid Waste Management To Be Included



October 1, 2025 VIA EMAIL

Dr. Aneisha Daniel, PhD Miami Dade Department of Solid Waste Management 2525 NW 62 Street Miami, Florida 33147 Aneisha.daniel@miamidade.gov

Re: City Park DRI - Solid Waste Management

Dear Dr. Daniel:

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

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;
- Table 1 describing the proposed development program and;
- Table 2 Projected Solid Waste Generation Rate for City Park

We request that your response address the following issues, as required by our application:

- 1. the projected excess capacity of the facilities serving the development at present and through the completion of the project;
- 2. any other commitments that have been made for this excess capacity;
- 3. a statement of the agency's ability to provide service at all times during and after development.

Please indicate in your response whether the present facilities/staffing are capable of serving the Project or specifying the additional staffing/equipment and facilitiesnecessary 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, Kdb Curtis

Rob Curtis

Ms. Dr. Daniel City Park DRI October 1, 2025 Page 2

The Curtis Group

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	1,029 homes					
- Single Family Attached	4,532 townhomes					
- Multi-Family	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,	249.5 acres					
Open Space, Parks						

TABLE 20-1 CITY PARK PROJECTED SOLID WASTE GENERATION									
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