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Goren, Cherof, Doody &
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November 25, 2025

Mr. Jeffrey Bercow, Esquire
Bercow Radell Fernandez Larkin + Tapanes
200 S. Biscayne Boulevard, Suite 300
Miami, Florida 33131

RE: City Park Development of Regional Impact (DRI) Statement of Information Needed (SIN1)

Dear Mr. Bercow:

South Florida Regional Planning Council staff, in coordination with partner review agencies, has reviewed the proposed City Park DRI's Application for Development Approval (submitted on October 6, 2025) for Sufficiency pursuant to §380.06(10), Florida Statutes (Fla. Stat.) [2015] and Rule 73C-40.022(3), Florida Administrative Code (F.A.C.) [2015]. As you are aware, the proposed City Park DRI met the requirements of §380.06(12)(b)2., Fla. Stat., and is subject to review under the 2015 versions of §380, Part I, Fla. Stat., and Rule 73C-40, F.A.C. These statutes and rules, along with the Agreement to Delete (executed between the Council and Applicant, May 19, 2025), were employed to determine sufficiency.


The Sufficiency Review Period was initially extended by the Applicant in writing (on October 3, 2025) to 45 days and subsequently extended by the Applicant in writing (on November 18, 2025) to November 25, 2025. The SFRPC staff recognizes and is grateful for your (and the consultant team's) assistance and professionalism reflected in the preparation of the City Park DRI Application for Development Approval (ADA) and subsequent review process.

Upon review of the Council and partner agencies, please find herewith requests for additional information. At this point, the ADA is deemed to be insufficient, as defined by Rule 73C-40.022(3)(c) and the City Park DRI applicant's response to the questions as outlined in the Agreement to Delete (dated May 8, 2025). The SFRPC also received input from partner review agencies, including requests for additional information. The SFRPC's requests are presented in the Statement of Information Needed by ADA Question. The partner review agencies' requests for additional information are provided as attachments and considered part of the Statement of Information Needed. Please address all comments within the SFRPC Memo and partner agency attachments.



Please contact Christina Miskis and Kathe Lerch with any substantive questions related to this Sufficiency Review at sfadmin@sfrpc.com, with copy to me (isabelc@sfrpc.com) and Legal Counsel Sam Goren (sgoren@gorencherof.com) as appropriate. Please do not hesitate to let me know how we can assist you and the Applicant Team to move this process ahead expeditiously.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Isabel", written in a cursive style.

Isabel Cosio Carballo, MPA
Executive Director

CC: Distribution List (Attached)

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names in brown are assoc w/ Alex D.

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MEMORANDUM

DATE: November 25, 2025

TO: City Park DRI Applicant

FROM: South Florida Regional Planning Council

SUBJECT: City Park DRI – Sufficiency Review

SFRPC staff has conducted the sufficiency review of the proposed City Park Development of Regional Impact's (DRI) Application for Development Approval (ADA) pursuant to §380.06(10), Florida Statutes (Fla. Stat.) [2015], Rule 73C-40.022(3), Florida Administrative Code (F.A.C.) [2015], and Agreement to Delete (ATD dated May 8, 2025). As part of this review, the SFRPC also received input from partner review agencies.

Based on SFRPC staff's evaluation and the feedback provided by the reviewing agencies, the ADA is insufficient. This Memo, the comments below, and the attachments from partner agencies, constitute the Statement of Information Needed (e.g., the additional information, clarifications, and revisions required to address the identified issues and to meet the sufficiency requirements). All SFRPC comments and partner agency and government comments must be addressed, as listed within this Memo and its referenced attachments.

As listed in the ATD, responses to the following questions are required: 1-18 (except D), 19 – 24 (except C), 25-31 (except C, E, F), 34, 39, 40.

5. Legal Description

The SFRPC is coordinating with Miami-Dade County regarding the submitted legal description, which was concurrently provided in applications to amend the Comprehensive Master Development Plan and Zoning. If Miami-Dade County requires additional information regarding the legal description, the Applicant will also amend its ADA.



South Florida Regional Planning Council
1 Oakwood Boulevard, Suite 250, Hollywood, Florida 33020
954-924-3653 Phone, 954-924-3654 FAX
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10. General Project Description

Further data and analysis will need to be completed and provided, as detailed by the SFRPC and partner agencies within this memo and attachments, to complete determination of consistency with Local and Regional Plans, and the State Comprehensive Plan. It is noted that the CDMP directs the County to avoid redesignating land classified as Agriculture when considering expansion of the Urban Development Boundary (UDB), yet the application does not demonstrate consistency with this policy. Because the subject property lies outside the 2040 Urban Expansion Area and no analysis is provided to justify relocating the UDB beyond areas already identified for potential expansion, additional data and policy support are required.

Table 10-E: Provide updated demographic information for Table 10-E.1, the 2023 population statistics are dated and may not reflect existing conditions. Additionally, update population projections in Table 10-E.2 to reflect current population projections from Miami-Dade County rather than the Metropolitan Transportation Planning Organization.

Premature Development (Page 10-31): The following application does not sufficiently address how the proposed development is not a premature expansion of the Urban Development Boundary. The Applicant states housing is available within the surrounding neighborhoods through 2029. However, there is available land within the Urban Development Boundary to support population growth through 2040. The applicant needs to provide further details on how this development is not premature and supports Miami-Dade County's efforts for balanced growth.

Impact Summary (Page 10-35): The applicant does not summarize the cost of the necessary public facilities to support development. In particular, the capital costs associated with transportation improvements are necessary to determine the fiscal impact of the development on County resources. Existing resources must be prioritized towards existing, programmed, and planned activities prior to the construction of new facilities outside of the Urban Development Boundary.

Lack of Intergovernmental Coordination (10-31): Coordination with the Miami-Dade Department of Transportation and Public Works and Miami-Dade Transportation Planning Organization is needed as the applicant lists transportation facilities that are not intended to service the proposed development. Neither the SMART Plan nor Metrobus have plans to service the area, thus, expansion of the existing transportation services will produce fiscal impacts on the County and potentially delay the implementation of the existing SMART Plan corridors. Additional information regarding the CSX line is needed and whether daily resident transportation demands of the proposed development would be alleviated provided that CSX primarily services commercial industry rather than commuters.

11. Revenue Generation

1. Direct contradiction about estimating sales tax revenues

What the text does:

- Table 11-1 includes a recurring row labeled "Sales & Other Tax (IMPLAN)" with annual and total values for 2027 to 2036; and the narrative also states that the County will generate ongoing sales and other taxes from operations, assumes average retail sales of \$350 per square foot, and notes that IMPLAN is used to estimate these taxes.
- Later, under a separate "Sales Tax" subheading near the end, the text says there is not enough information on retail sales volume and lease rates, so it is very difficult to estimate revenue from sales tax and therefore does not estimate it.

Both cannot be true at the same time. If sales tax revenues are quantified in Table 11-1 and described as being estimated with IMPLAN and an assumed \$350 per square foot, the document cannot also claim that sales tax revenue cannot be estimated because of insufficient information. This is a clear internal contradiction.

2. Noncompliance with the Question 11 requirement for gasoline tax projections

The Question 11 instructions require yearly projections for gasoline tax received by local government.

- The Gasoline Tax subsection describes state and county per gallon tax levels.
- It then states that fuel consumption varies and fuel prices are volatile, so gasoline tax revenue is not calculated for this analysis.

Given the explicit requirement to project yearly gasoline tax receipts, this is a discrepancy between the ADA question and the actual response. The text recognizes the revenue source but simply omits the projections, rather than applying a reasonable set of simplifying assumptions to quantify it.

3. Inconsistent description of the analysis period start year

The text states that the revenue analysis covers 2026 through 2036. Table 11-1 and Table 11-2 both start in 2027 and end in 2036. If the proposed development or revenue begins in 2026, the tables should include a 2026 row to show the first year of construction. If development actually begins in 2027, the narrative period of 2026–2036 is incorrect and should be revised.

4. Use of IMPLAN and assumed sales per square foot versus claims of insufficient information

For ongoing sales tax and related revenues, the narrative explicitly assumes:

- an average retail sales level of \$350 per square foot in 2025 dollars
- the use of IMPLAN to estimate sales and other taxes from this operations spending

That assumption already resolves the lack of detailed tenant or lease information. Later, the text again argues that there is not enough information on retail sales volume or lease rates to estimate sales tax. Once a specific sales per square foot assumption is adopted and IMPLAN is applied, the claim that there is not enough information to estimate sales tax is no longer defensible within the document's own logic.

5. Template language asserting inability to estimate several required revenue types

Question 11 instructions ask for projections of:

- occupational license revenues
- hotel and restaurant taxes
- gasoline taxes
- water and sewer charges
- and any other reasonably connected sources

In the narrative:

- Occupational license revenue is acknowledged but not quantified.
- Water and sewer ongoing user charges are acknowledged but not quantified.
- Hotel and restaurant taxes are mentioned but not quantified.
- Gasoline tax is not quantified explicitly.
- Parts of the text also claim sales tax is not estimated, despite the presence of IMPLAN-based sales tax rows in Table 11-1.

Given that other parts of the section rely on broad assumptions and IMPLAN multipliers, the claim that these revenue streams cannot be estimated is inconsistent with the analytic approach used elsewhere in the same section. It reads as leftover template text and conflicts with the stated purpose of the revenue projection.

13. Wetlands

Response does not address the proposed wetlands sufficiently. Please answer questions based on the proposed water systems (lakes, waterways, littoral plantings, etc.) in accordance with best Miami-Dade County and regional sustainability practices.

14. Water and 15. Soils

An analysis of soil contamination is needed to determine the potential adverse regional impact. A Phase I Environmental Site Assessment (ESA) will determine if current or historical property uses have impacted the soil or groundwater and could pose a threat to human or environmental health. If contamination is discovered or contaminants of concern are identified, a full site assessment shall be developed in accordance with Rule 62-780, F.A.C., for further review by the Department of Environmental Protection (FDEP) under this rule. Although arsenic would be the suspected substance based on the agricultural use of site, that does not preclude the possibility

of other substances being found during site assessments. FDEP has provided additional detail on the analysis needs and further steps in the attachments.

17. Water Supply

Please revise the total number of units for consistency across Miami-Dade and SFRPC submissions to ensure proper analysis of water supply. The SFRPC cannot determine the impact of the proposed development without consistent information.

18. Wastewater Management

18-C (18-1 or 156): The Miami-Dade County Water and Sewer Department has not determined that there is capacity within existing facilities to accommodate this development. The SFRPC cannot determine the impact of the proposed development without potable water and sewer capacity information.

19. Stormwater Management

The applicant needs to provide additional information regarding consistency and conformity with Comprehensive Everglades Restoration Plan's stormwater management activities, including but not limited to the Central and Southern Florida Flood Resiliency Study and Southern Everglades Study. The Southern Everglades Study analyzes how to accommodate 342,000 acre feet of water through seepage management, and the ADA did not address how such efforts may affect City Park's proposed development plan and entitlements and vice versa.

19-B (Page 19-1): The applicant has not provided information regarding the potential use of wetlands within the stormwater management system. Please specify if wetlands, if any, will be integrated into the planned retention lakes and swales.

19-C (19-2 Or 166): Please provide information regarding how impervious surface area was calculated for residential uses. Table 19-1 does not provide a distinction between detached and attached single-family homes relative to their impervious surface area.

19-D (19-2 or 166): The applicant does not discuss the quality of the run-off produced by the development, which may include pollutants that diminish water quality within the Biscayne Bay Aquifer Recharge area. This is of particular concern as the application site receives a higher level of rainfall than the surrounding area. Discuss the quality of existing runoff produced by agricultural activities on the site and whether the planned stormwater infrastructure adequately filters run-off. Additionally, incorporate information on existing soil contents and how previous agricultural activities may impact the efficacy of future retention lakes.

19-E (19-3 or 167): Clarification is needed regarding the maintenance of the proposed stormwater canal, specifically whether the HOA or South Florida Water Management District will operate and maintain the structure.

Conceptual Stormwater Management Master Plan

- Water Quantity: The nutrient loading analysis assumes the entire site is developed as multi-family and single-family land use and does not provide results detailing the nutrient loading anticipated. Please include all land use types within the nutrient loading analysis, including industrial and commercial land uses to accurately reflect the development plans.
- The conceptual plan does not outline where the swales, lakes, and exfiltration trenches are planned for the site, please include more detail on the location of these stormwater features.

21. Transportation

1. Please include the following missing roadway segments in the analysis:
 - SW 144th Street
 - SW 136th Street from SW 162nd Ave to SW 157th Avenue
 - SW 152nd Street, from SW 162nd Avenue to SW 157th Avenue
2. Some Maximum Service Volume (MSV) values could not be verified. Please double-check for all roadways; few examples are below:
 - SW 152nd Street from SW 112th Avenue to U.S. 1 is a state roadway with C3R context classification. The MSV should be 2,400 ($2,000 \times 1.20$ {adopted LOS E + 20%}).
 - SW 177th Avenue/Krome Avenue from SW 312th Street to SW 328th Street is a non-state roadway with a 30-mph speed limit. The MSV should be 756 ($800 \{LOS E\} \times 0.90$ {adjustment for non-state} $\times 1.05$ {adjustment for divided and exclusive left turn lane}).
 - State Road (S.R.) 874 is a 3-lane limited access roadway and should have an MSV of 6,080.
 - SW 137th Avenue from S.R. 836 to SW 8th Street, is a state roadway with C3C context classification. The MSV should be 2,814 ($2,680 \times 1.05$ {right turn lane adjustment}).

Please include columns for context classification for state roads, and for posted speed limits for non-state roads. Please also include any adjustment factor(s) used to determine MSV. This would assist with the review.

3. It is unclear why some segments have two different thresholds for the two directions while their roadway characteristics are the same.
4. It is unclear how the D-factor was determined and utilized. For example, for Krome Avenue, the three-day D-factor ranges from 60.0% to 61.9%. Additionally, it is unclear how the peak direction of travel was determined for non-state roads.

5. In Table 21.A.3, some values in the "Existing PM Peak Hour Directional Volume" column could not be verified. For example, PDF page 55 of the Appendix of the Applicant's submittal shows that peak hour volumes for SW 136th Street from SW 137th Avenue to SW 127th Avenue to be 394 and 460 for EB and WB, respectively. The table shows these values to be 438 and 489. Please confirm or revise, as needed.
6. It is unclear why sometimes the same roadway has different "Adopted LOS Standards". For example, NW/SW 137th Avenue from S.R. 836 to SW 8th Street, Table 21.A.2 shows a D LOS, whereas Table 21.A.3 shows E+20. Please check for all roadways and update, as needed.
7. Consistent with the methodology, multimodal reductions should be based on mode share data related to commuters' transit and bike-pedestrian usage only. Please remove "Work from Home" reduction.
8. Consistent with the methodology, please make sure that the pass-by trips are limited to 10% of the adjacent streets' traffic volumes.
9. Consistent with the methodology, trips from committed developments should be included. Please coordinate with FDOT and Miami-Dade County on the committed developments.
10. For a comprehensive review of the trip distribution, please provide the SERPM outputs.
11. The trip distribution percentages on Turnpike appear to be low. Coordination with Turnpike staff will occur once SERPM outputs are reviewed.
12. Please double-check the number of lanes for 2036 in Table 21.E.1. For example, westbound SW 104th Street from 157th Avenue to SW 147th Avenue should be 2LD.
13. Please ensure that all segments are correctly highlighted. For example, SW 147th Avenue from SW 200th Street to SW 216th Street is exceeding MSV due to projected project traffic. Please revise accordingly.

Note: The SFRPC acknowledges that some of the agency comments may have already been addressed in the Agreement to Delete and agreed methodologies.

Q21 Issues Overview by Topic and Agency

Issues on Q21 that need to be addressed include, but are not limited to:

1. Missing / Incomplete Analysis

- Missing intersection LOS analysis (FDOT, RER, DTPW)
- Many ADA sections blank pending "segment sufficiency" (FDOT, Commerce)
- Unsupported trip generation assumptions (RER, DTPW, TPO)
- No SERPM files to verify distribution (GMX, SFRPC, DTPW)
- No scenario without CSX crossings (GMX)

2. Segment Analysis Errors / MSV Inconsistencies

- Missing roadway segments (SFRPC, RER, GMX)
- MSVs incorrect or unverifiable (SFRPC, GMX, DTPW)
- Different LOS standards for same roadway in different tables (SFRPC)
- Incorrect peak direction & D-factor documentation (SFRPC, DTPW)
- Highlighting of deficient segments inconsistent (SFRPC)

3. Traffic Counts & Background Traffic Deficiencies

- Missing count dates, sources, and adjustments (DTPW, RER)
- Required 72-hour counts not completed (RER)
- Missing committed developments >100 trips (DTPW, RER, SFRPC)
- PM peak period too limited (GMX)

4. Trip Generation & Reductions Problems

- 9.8% work-from-home deduction rejected (RER, TPO, DTPW, SFRPC)
- Internal capture rate (39.5%) likely non-compliant with ITE criteria (DTPW)
- Pass-by rates must be ≤10% (SFRPC)
- Multimodal reductions must match actual regional mode share (SFRPC, DTPW)

5. Roadway Improvements, Mitigation, & Phasing

- Short-term and long-term phasing missing (RER)
- Unfunded off-site improvements outside UDB incorrectly assumed (RER)
- Insufficient clarity on developer- vs agency-funded projects (DTPW, TPO)
- Proportionate share calculations not provided (RER, DTPW)
- ROW dedication commitments missing (DTPW)

6. Access & Circulation Issues

- FDOT requires realignment for 4-legged intersection at SR 997/SW 136th Street
- Missing narrative on how access plan preserves traffic flow (TPO, DTPW)
- Eastern access (SW 144th Street) not analyzed (GMX, SFRPC)
- Rail crossing treatments & CSX coordination incomplete (RER)

7. Multimodal, Transit, & TDM

- CSX Spur not part of SMART Plan; transit assumptions unrealistic (TPO, DTPW)
- No timelines for multimodal improvements (TPO)
- Bus extensions require developer O&M funding (DTPW)
- TDM plan vague, not enforceable (TPO, DTPW)
- Missing transit hub details and infrastructure plans (TPO, DTPW)

8. Modeling & Trip Distribution Errors

- SERPM input/output files missing (RER, DTPW, GMX, SFRPC)
- Unrealistically low traffic assigned to SR 874 & Turnpike (GMX, SFRPC)
- Low traffic increases on local roads inconsistent with project scale (GMX)

Please note that all agency comments are attached as an appendix, including those from:

FLORIDA DEPARTMENT OF TRANSPORTATION, DISTRICT SIX (FDOT)
MIAMI-DADE REGULATORY AND ECONOMIC RESOURCES (RER)
MIAMI-DADE TRANSPORTATION AND PUBLIC WORKS (DTPW)
GREATER MIAMI EXPRESSWAY AUTHORITY (GMX)
MIAMI-DADE TRANSPORTATION PLANNING ORGANIZATION (TPO)

23. Hurricane Preparedness

Evacuation Routes

On November 12, 2025, the Monroe County Board of Commissioners adopted R 510-2025 requesting “1. Conduct regional evacuation modeling using the same consultant contracted by the State of Florida Division of Emergency Management / Florida Department of Transportation to run the TIME model to show what the regional impacts of the DRI will be, specifically impacts on evacuation of the Florida Keys; and 2. In the absence of modeling Monroe County requests that the DRI be required to provide sheltering for 100% of the residents of the development.”

SFRPC staff once again requested assistance and clarification from FDOT as to the availability of the TIME model and assistance in running the model if available. On November 24, 2025, FDOT District 6 advised that FDOT Central Office will run the most current TIME model available and provide the output to SFRPC staff for analysis. An evaluation of the regional impact on hurricane evacuation routes is underway by the SFRPC. Given that the use of the TIME model was stipulated in the ATD, Question 23, if available, and has now been provided by FDOT, this question remains open.

Shelter Space

The applicant used Census-based calculations to estimate voluntary evacuees in a Category 3 storm and committed to providing 1,100 shelter spaces at the proposed high school based on Miami-Dade’s protective measures plan. However, the SFRPC and the County find the applicant’s hurricane preparedness response on this issue to be insufficient as although the proposed high school is described as a future hurricane evacuation shelter, there is no binding commitment to build or operate it as such, no confirmation that it could meet Enhanced Hurricane Protection Area (EHPA) standards, and no evidence of coordination with MD DEM or Miami-Dade Public Schools. The County also raised concerns that the proposed school sites are located outside the UDB in conflict with siting policies and may lack appropriate elevation and transit access needed for safe storm-surge evacuation. MD DEM emphasized the need for direct coordination because any shelter must meet Comprehensive Emergency Management Plan (CEMP) requirements, satisfy updated safety criteria, and involve multiple agencies such as DTPW and Fire Rescue. Additionally, the applicant’s evacuation analysis relies on uncertain population estimates, as its projections differ from the County’s making the validity of the evacuation impact assessment unreliable.

24. Housing

Question A.1 not answered by phase

The question asks for units by tenure and price for each phase of development. The response provides only a single buildout table with no phasing.

Question A.3 not answered as requested

The question asks for number and percent of units by market segment and for second home or vacation use. The response is qualitative only and gives no numbers or percentages.

Question B not answered as written

The question requires a description of housing opportunities by type, tenure, cost range, and location in specific bands: adjacent, two miles, five miles, ten miles, and within the jurisdiction or county. The response uses a single 20 minute or 10-mile drive time area and does not provide the requested banded description.

Employment opportunities outside the DRI not described

Question B asks for employment opportunities in the local jurisdiction, classified by two digit SIC with distance or transit time to the site. The response instead estimates only jobs inside and does not describe the surrounding job base. Indirect and induced jobs can be estimated from IMPLAN.

Internal inconsistency in multifamily unit counts

In Table 24 A.1, the multifamily rental unit counts by rent range sum to 2,240, but the table total shows 2,239. The total residential figure of 7,800 relies on the 2,239 value, so one unit is unaccounted for in the rent distribution.

Internal inconsistency in retail floor area

Table 24 A.2 reports 579,289 square feet of commercial or retail space. The narrative immediately after describes approximately 684,000 square feet of retail space with no explanation of the difference.

Arithmetic error in affordable housing demand

In Table 24 B.1, the very low-income total is reported as 349. The component rows sum to 350. Later in Table 24 B.11 the demand for very low-income units is 350.

Inconsistent deficit figures after the 5 percent mitigation allowance

The text states that the estimated deficit of affordable housing for City Park is 308 units. Table 24 B.12 shows a net deficit of 320 units from the same calculation.

Methodological choices bias the deficit upward and are not justified

For ownership supply, the analysis calculates 1,387 affordable sales from the property appraiser, then discards these in favor of much lower MLS listings for the same area and period. The change in measure from closed sales to current listings is not part of the described methodology and sharply reduces the counted supply.

Demand side limited to on-site direct jobs only

The analysis estimates affordable housing need only from direct DRI employment. It ignores induced and indirect jobs and ignores the effect of the new 7,800 units on demand for affordable units outside the project. The chapter does not explain this choice relative to the DRI methodology.

Project housing program does not address identified need

Tables 24 B.3 to 24 B.7 show moderate income ownership affordability capped at roughly \$347,500 and moderate net rents capped near \$2,416. Table 24 A.1 prices all single-family units above \$550,000 and most townhomes above \$450,000. Forty percent of rentals start above \$2,750. The response identifies a deficit of very low- and low-income units and relies on moderate income supply in the surrounding market, yet the City Park housing program itself provides almost no units affordable at the very low, low, or moderate thresholds, and it does not acknowledge or address this mismatch.

Inconsistent use of HUD affordability standards

The text states that HUD defines affordable housing as costing no more than 30 percent of income. It then assumes a 36 percent cost burden for ownership without citing a different standard or justification.

Question B requirement for “projected availability” is not met

The supply analysis uses current year MLS listings and current vacancies from CoStar. It does not address future pipeline projects in the 20-minute drive time area or in the jurisdiction, so it does not provide a forward-looking view of adequacy.

Documentation and clarity problems

Examples include the phrase “first quarter of Q4 2024” for QCEW data, undefined acronyms in some tables, and very large, detailed appendices without a clear summary of how headship rates and multi worker households are converted into dwelling unit demand. These issues make replication and review of the calculations difficult.

Additional comments

Please define the reference of “workforce” and “attainable” housing in terms of Area Median Income for clarity. The Applicant should provide additional information about its analysis of housing supply. The rational nexus for using transactional sales from the past constituting the available supply is not supported; therefore, the potential adverse impacts to affordable housing cannot be determined. Additionally, the information related to transactional sales does not demonstrate these are habitable dwelling units. Any housing supply estimation should demonstrate units are safe and suitable for occupancy.

29. Energy

A. Projection of Energy Demands B. Description of On-Site Electrical Generating Facility C. Letter from Off-Site Supplier D. Description of Energy Conservation Methods or Devices

On page 7 for Exhibit 29-1, the Applicant states “Letters to and From Florida Power and Light (FPL)” however there is no response letter from FPL. FPL is the only utility that could service the area; therefore, the applicant will need to ensure there is enough grid capacity to provide electricity. Please provide documentation. The applicant will also need to work with FPL to provide a timeline for required transformers, conduits, and any other necessary materials to provide electricity to the development site.

On pages 4 and 6, the applicant states they will have EV-ready infrastructure. The applicant will need to work directly with FPL and Miami-Dade County to ensure there is enough grid capacity for fleets and shuttles to charge. An EV transit bus requires 100-800 kWh of electricity to be charged. The charging depot or charging stations within the development will need to accommodate EV school buses as well. Depending on the battery capacity of the vehicle, up to 500 kWh of electricity may be needed.

39. Sea Level Rise

Please address specifically which proposed on-site infrastructure is vulnerable to sea level rise including planned roadways, canals, or other physical infrastructure. The considerations listed to address sea level change do not represent *commitments* to mitigate potential impacts. Please indicate which of the listed actions are committed and will be incorporated within on-site infrastructure vulnerable to sea level rise.

40. Agriculture

It is unclear how the proposed development will affect the water resources of the Miami-Dade Agriculture sector, which still needs to be sufficiently addressed. The issues with the associated water supply and stormwater management responses must be addressed for further review of potential impact on Agriculture to be completed.

It is acknowledged by the SFRPC that using the County’s 2023 *Evaluation of Agricultural Land Use Trends and Outlook*, the Applicant claims that the proposed development would not adversely impact Miami-Dade County’s agricultural lands or production. The applicant claims that the Study shows that the County’s agricultural economy is overwhelmingly driven by nursery and floriculture operations, which generate more than 80% of sales while using less than one-fifth of farmland, while row crops, which occupy most farmland, are economically marginal and face severe competitive pressures. However, the percentages shown for nursery and row crops acreages are incorrect as noted by Miami-Dade County and need to be corrected for subsequent review. The applicant claims that because the project site is used exclusively for low-value row crops and has never supported nursery or floriculture activity, its conversion does not affect the County’s dominant agricultural sector. However, the response has not sufficiently considered the water resources and transportation needs of that sector or the Agricultural sector as a whole.

It is noted by the applicant that the Study projects declining demand for agricultural land through 2050, with thousands of acres expected to fall out of production; therefore, removal of

approximately 1,000 acres does not jeopardize the minimum acreage needed to sustain a viable agricultural industry. However, the Study did not incorporate in its analysis the current rate of development occurring in Miami-Dade County. Committed developments will need to be considered in the analysis of availability of agricultural land for a viable industry.

NOTE: Please address all comments and issues received in the attached correspondence from:

DEPARTMENT OF STATE, CULTURAL RESOURCES

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA DEPARTMENT OF TRANSPORTATION, DISTRICT SIX

FLORIDA COMMERCE

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION

GREATER MIAMI EXPRESSWAY AUTHORITY

KEY COLONY BEACH

MIAMI-DADE COUNTY

MONROE COUNTY

FLORIDA'S TURNPIKE ENTERPRISE

From: [Putman, Ethan D.](#)
To: [SFRPC Admin](#)
Cc: [Archaeological & Historical Conservancy](#)
Subject: CRAS City Park AHC FDEO 2022-6659-D
Date: Friday, October 31, 2025 4:38:46 PM
Attachments: [2022-6659-D City Park CRAS AHC FDEO Miami-Dade NAE.pdf](#)

You don't often get email from ethan.putman@dos.fl.gov. [Learn why this is important](#)

To whom it may concern,

Our office has reviewed the AHC CRAS entitled *A PHASE I CULTURAL RESOURCE ASSESSMENT SURVEY OF THE CITY PARK PARCEL, MIAMI-DADE COUNTY, FLORIDA*, related to an FDEO undertaking. We find the report to be complete and sufficient with regard to Chapter 1A-46 and State standards. Please find attached our comments; feel free to contact me with any questions.

Thank you for your time,

Ethan Putman, MA, RPA

| Historic Preservationist | Compliance and Review Section | Bureau of Historic Preservation |
Division of Historical Resources | Florida Department of State | 500 South Bronough Street |
Tallahassee, Florida 32399 | 850.245.6358 | Ethan.Putman@dos.fl.gov |
dos.myflorida.com/historical





FLORIDA DEPARTMENT of STATE

RON DESANTIS
Governor

CORD BYRD
Secretary of State

Florida Department of Commerce
107 E Madison St.
Tallahassee, FL 32399

October 31, 2025

RE: DHR Project File No.: 2022-6659-D
*A PHASE I CULTURAL RESOURCE ASSESSMENT SURVEY OF THE CITY PARK PARCEL,
MIAMI-DADE COUNTY, FLORIDA*

Received by DHR: October 7, 2025

To Whom It May Concern:

Our office reviewed the referenced project in accordance with Chapters 267.061 and 373.414, *Florida Statutes*, and implementing state regulations, for possible effects on historic properties listed in, or eligible for, the *National Register of Historic Places*. The project is subject to compliance with requirements for a Florida Department of Commerce undertaking.

In July-August 2025, Archaeological and Historical Conservancy, Inc. (AHC) conducted the above referenced Phase I cultural resource assessment survey (CRAS) on behalf of The Curtis Group. AHC excavated approximately 937 acres with 108 shovel tests dug throughout the project area in Miami-Dade County. As a result of the survey, one historical resource was newly recorded. This resource is 8BD9504 (CSX Railroad W Kendall Spur N Bend Segmt), a ca. 1957 railroad spur for which AHC had insufficient information to provide a recommendation of eligibility. No archaeological sites were identified. Based on these results, it is the opinion of AHC that the proposed project will have no adverse effect on any known historic properties.

Based on the information provided, our office concurs with the survey results and recommendations presented and finds that the proposed project should have no adverse effect on historic properties listed, or eligible for listing, in the NRHP. Further, we find the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

If you have any questions, please contact Ethan Putman, Historic Preservationist, by email at Ethan.Putman@dos.fl.gov.

Sincerely,

Alissa Slade Lotane
Director, Division of Historical Resources
& State Historic Preservation Officer

FDACS (Ag) - no comments on City Park DRI ADA sufficiency review

From Christina Miskis <CMiskis@sfrpc.com>

Date Fri 11/14/2025 9:26 AM

To Isabel Cosio Carballo <isabelc@sfrpc.com>; Bob Cambric <bob.cambric@gmail.com>

Cc Kathe Lerch <klerch@sfrpc.com>; Randy Deshazo <rdeshazo@sfrpc.com>

I just spoke with Lauren Fillyaw at FDACS and she said that the agency has reviewed the materials and has no comment.

Thanks,
Christina

Christina Miskis, AICP
Principal Planner
South Florida Regional Planning Council
1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020
954.924.3653 (o) | cmiskis@sfrpc.com



Confidentiality Notice: Please note that Florida has broad public records laws and all correspondence sent via email may be subject to disclosure.

RE: City Park DRI Application for Development Approval (ADA)

From Fillyaw, Lauren <Lauren.Fillyaw@fdacs.gov>

Date Wed 11/5/2025 10:44 AM

To Christina Miskis <CMiskis@sfrpc.com>

Cc Mears, Kathy (Assistant Commissioner) <Kathy.Mears@fdacs.gov>; Bob Cambric <bob.cambric@gmail.com>; Kathe Lerch <klerch@sfrpc.com>; Isabel Cosio Carballo <isabelc@sfrpc.com>; SFRPC Admin <sfadmin@sfrpc.com>

Good morning Christina,

I spoke with Commerce earlier this morning, we are working on the review now.


Thanks!

Lauren Fillyaw

Senior Management Analyst II

Office of Policy and Budget

Florida Department of Agriculture and Consumer Services

 (850) 410-2292

 Lauren.Fillyaw@fdacs.gov

The Capitol

400 South Monroe Street

Tallahassee, Florida 32399-0800

www.FDACS.gov

Please note that Florida has a broad public records law (Chapter 119, Florida Statutes). Most written communications to or from state employees are public records obtainable by the public upon request. Emails sent to me at this email address may be considered public and will only be withheld from disclosure if deemed confidential pursuant to the laws of the State of Florida.

From: Christina Miskis <CMiskis@sfrpc.com>

Sent: Wednesday, November 5, 2025 10:37 AM

To: Fillyaw, Lauren <Lauren.Fillyaw@fdacs.gov>; CompPlans <CompPlans@fdacs.gov>

Cc: Mears, Kathy (Assistant Commissioner) <Kathy.Mears@fdacs.gov>; Bob Cambric <bob.cambric@gmail.com>; Kathe Lerch <klerch@sfrpc.com>; Isabel Cosio Carballo <isabelc@sfrpc.com>; SFRPC Admin <sfadmin@sfrpc.com>

Subject: Re: City Park DRI Application for Development Approval (ADA)

You don't often get email from cmiskis@sfrpc.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Lauren,

I'm following up on the Council email of October 7th, included in the chain below, and our conversation yesterday. You indicated yesterday that the Florida Department of Agriculture and Consumer Services

(FDACS) will only review when there is a Commerce reference number assigned. As such, I can share that the Commerce reference number assigned to the current City Park DRI application is **11-21-07 "Reapplication"** and was previously assigned the number 11-07-005 when the applicant first applied. Please note comprehensive plan amendments and DRI employ different reference number formats. Does this reference number suffice to authorize FDACS review? Please advise.

The current request from the Council is a 'sufficiency review' of the proposed City Park DRI ADA. The materials, for your easy reference, are accessed via this link: <https://sfregionalcouncil.org/city-park-dri-review-materials/>. Our original request has been for the review agencies to provide comments to us by today, November 5th, 2025. However, as I expect FDACS may need additional time due to this process question, we will welcome comments by Wednesday, November 12th.

As background, the City Park DRI met the exemption requirements within s.380.06, Fla. Stat. As such, the proposed DRI is being reviewed under the 2015 versions of s.380.06, Fla. Stat., and Rule 73C-40. Florida Administrative Code. FDACS is a review agency within the Development of Regional Impact Program along with the Departments of Commerce, Environmental Protection, State, and Transportation as well as the Florida Fish and Wildlife Conservation Commission, Florida Turnpike Enterprise, and South Florida Water Management District.

The proposed City Park DRI will be accompanied by a proposed amendment to Miami-Dade County's Comprehensive Development Master Plan. That amendment will be issued a number by the Department of Commerce pursuant to s.163.3184, Fla. Stat.

Please email me with any questions.

Thank you,
Christina

Christina Miskis, AICP

Principal Planner

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | cmiskis@sfrpc.com





RE: City Park DRI Application for Development Approval (ADA)

From Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>

Date Tue 11/18/2025 2:11 PM

To Bob Cambric <bob.cambric@gmail.com>; Christina Miskis <CMiskis@sfrpc.com>

Cc Kathe Lerch <klerch@sfrpc.com>; Plan_Review <Plan.Review@dep.state.fl.us>; Isabel Cosio Carballo <isabelc@sfrpc.com>

Hi Bob,

As mentioned, an analysis of potential soil contamination could aid the Department in assessing potential adverse impacts. This could consist of a Phase I Environmental Site Assessment (ESA) to assess whether current or historical property uses have impacted the soil or groundwater and could pose a threat to the environment and/or human health. If Phase I results indicate potential contamination risks, a Phase II ESA is typically performed, which involves collecting samples from soil and groundwater and conducting laboratory tests to identify any further potential sources of contamination. The referenced ESAs are defined by ASTM International, which also provides standards, but are not required by the Department under 62-780, F.A.C. If contamination is discovered, or contaminants of concern are identified, a full site assessment shall be developed in accordance with Rule 62-780, F.A.C., for further review by the Department under this rule. Arsenic would be the suspected substance based on the agricultural use of site, but that does not preclude the possibility of other substances being found during site assessments.

Thank you,
Lindsay

Lindsay Weaver

Director of Intergovernmental Programs
Florida State Clearinghouse Coordinator
Florida Department of Environmental Protection
Lindsay.Weaver@FloridaDEP.gov
Office: 850-717-9037

From: Bob Cambric <bob.cambric@gmail.com>

Sent: Tuesday, November 18, 2025 1:27 PM

To: Christina Miskis <cmiskis@sfrpc.com>

Cc: Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>; Kathe Lerch <klerch@sfrpc.com>; Plan_Review <Plan.Review@dep.state.fl.us>; Isabel Cosio Carballo <isabelc@sfrpc.com>

Subject: Re: City Park DRI Application for Development Approval (ADA)

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Lindsay,

As we discussed earlier today, please send an email with details about the requested contamination study (e.g., an official name/reference for the type study to be conducted; professionally-accepted methodologies to be employed; approved collection techniques; authorized/certified laboratories that may be used; site analysis procedures including sampling (if applicable); whether arsenic is the sole substance to be assessed and, if not, a list of other substances; and all other parameters.

Again, we appreciate DEP's input.

bc

On Tue, Nov 18, 2025 at 11:13 AM Christina Miskis <CMiskis@sfrpc.com> wrote:

Thank you, Lindsay.

We very much appreciate your review and coordination.

Christina

From: Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>

Sent: Tuesday, November 18, 2025 11:04:12 AM

To: Christina Miskis <CMiskis@sfrpc.com>

Cc: Kathe Lerch <klerch@sfrpc.com>; bob.cambric@gmail.com <bob.cambric@gmail.com>; Plan_Review <Plan.Review@dep.state.fl.us>

Subject: RE: City Park DRI Application for Development Approval (ADA)

Some people who received this message don't often get email from lindsay.weaver@floridadep.gov. [Learn why this is important](#)

Good morning, Christina:

I apologize for our belated response. FDEP staff reviewed the proposed ADA and commented that an analysis of soil contamination could be warranted, citing the potential for arsenic contamination in agricultural soils, but otherwise found it sufficient for review at this stage. Regulatory staff noted that additional detail would be required during any future permitting processes.

Thank you,

Lindsay

Lindsay Weaver

Director of Intergovernmental Programs

Florida State Clearinghouse Coordinator

Florida Department of Environmental Protection

Lindsay.Weaver@FloridaDEP.gov

Office: 850-717-9037

From: Christina Miskis <CMiskis@sfrpc.com>**Sent:** Monday, November 10, 2025 3:01 PM**To:** Blandin, Norva <Norva.Blandin@FloridaDEP.gov>; Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>**Cc:** Davila, Sirena <Sirena.Davila@FloridaDEP.gov>; Pupa, Diane <Diane.Pupa@FloridaDEP.gov>; Hurd, Jacqueline <Jacqueline.Hurd@FloridaDEP.gov>; Marion, Krista <Krista.Marion@FloridaDEP.gov>; Kathe Lerch <klerch@sfrpc.com>; Bob Cambric <bob.cambric@gmail.com>; Isabel Cosio Carballo <isabelc@sfrpc.com>**Subject:** Re: City Park DRI Application for Development Approval (ADA)**EXTERNAL MESSAGE**

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Good afternoon Norva and Lindsay,

I'm writing to provide some clarification. The Council is requesting a 'sufficiency review' of the proposed City Park DRI ADA. The materials, for your easy reference, are accessed via this link: <https://sfregionalcouncil.org/city-park-dri-review-materials/>. The question to be answered is whether there is sufficient information provided by the applicant to later determine mitigation needed for potential regional adverse impacts. Our original request was for the review agencies to provide comments to us by November 5th, 2025. However, as I expect you may need additional time due to questions regarding the process, we will welcome comments by **Monday, November 17th**.

The Commerce reference number assigned to the current City Park DRI application is **11-21-07 "Reapplication"** and was previously assigned the number 11-07-005 when the applicant first applied. Please note comprehensive plan amendments and DRI employ different reference number formats. As background, the City Park DRI met the exemption requirements within s.380.06, Fla. Stat. As such, the proposed DRI is being reviewed under the 2015 versions of s.380.06, Fla. Stat., and Rule 73C-40. Florida Administrative Code. DEP is a review agency within the Development of Regional Impact Program along with the Departments of Commerce, FDACS, FDOT as well as the Florida Fish and Wildlife Conservation Commission, Florida Turnpike Enterprise, and South Florida Water Management District.

The proposed City Park DRI will be accompanied by a proposed amendment to Miami-Dade County's Comprehensive Development Master Plan. That amendment will be issued a number by the Department of Commerce pursuant to s.163.3184, Fla. Stat.

Please email me with any questions. We appreciate your time and review.

Best,

Christina

Christina Miskis, AICP

Principal Planner

South Florida Regional Planning Council

[1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020](#)

954.924.3653 (o) | cmiskis@sfrpc.com

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From: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>
Sent: Thursday, November 6, 2025 4:57 PM
To: Kathe Lerch <klerch@sfrpc.com>
Subject: City Park DRI Application for Development Approval (ADA)
Importance: High

Good afternoon Mrs. Kelch,

Before the end of the day, I wanted to provide you with an update on your request. I consulted with our Plan Review Team and the Clearinghouse Team in Tallahassee, and guidance has been provided. Please refer to the email below for details.

Let me know if there's anything else you need, as we will review this further later in the process.

Kind regards,

Error! Filename not specified.

Norva Blandin, MSEM

Permitting Program Administrator

Florida Department of Environmental Protection

Southeast District – West Palm Beach

[3301 Gun Club Road](#), MSC 7210-1

West Palm Beach, FL 33406

Norva.Blandin@floridadep.gov

Office: 561.681.6728

Main: 561.681.6600

Fax: 561-681-6755

Good leadership is not advancing yourself. It is advancing your team

<https://floridadep.gov/southeast>

Notice: Florida has a broad public records law. Most written communications to or from state officials regarding official business are public records and may be disclosed upon request. Your email communications may therefore be subject to public disclosure.

From: Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>

Sent: Thursday, November 6, 2025 3:25 PM

To: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>; Davila, Sirena <Sirena.Davila@FloridaDEP.gov>; Pupa, Diane <Diane.Pupa@FloridaDEP.gov>; Hurd, Jacqueline <Jacqueline.Hurd@FloridaDEP.gov>; Marion, Krista <Krista.Marion@FloridaDEP.gov>

Cc: Plan_Review <Plan.Review@dep.state.fl.us>

Subject: RE: City Park DRI Application for Development Approval (ADA)

Importance: High

Good afternoon, Norva,

Thank you for bringing this to my attention. Our office did not receive this request from SFRPC, or any consultation from Florida Commerce in relation to this request or the referenced 2022 Multi-Party 380.032 F.S. Agreement. I see the deadline to respond has passed, but I will look into it. However, it will take some time to go through the materials, and due to my current workload and upcoming leave, I am unsure that I will be able to respond before the Council meeting on the 20th. However, this appears to only be a request to confirm sufficiency of the information for review, not an approval of the proposed development.

In addition to the Department's role in the permitting process, the County's comprehensive plan amendment to change the land use on the proposed development site will need to be reviewed by our office and other state agencies for adverse impacts to important state resources (30-day review pursuant to §163.3184, F.S.). Based on the timeline with this ADA, it is likely that we will receive the submittal sometime in December. Once received, I will route the review package to SED along with other appropriate divisions/offices for comment (just FYI, this will come through the Plan Review program not Clearinghouse).

Thanks again,

**Error! Filename
not specified.**

Lindsay Weaver

Director of Intergovernmental Programs

Florida State Clearinghouse Coordinator

Florida Department of Environmental Protection

Lindsay.Weaver@FloridaDEP.gov

Office: 850-717-9037

From: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>

Sent: Thursday, November 6, 2025 1:19 PM

To: Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>; Davila, Sirena <Sirena.Davila@FloridaDEP.gov>; Pupa, Diane <Diane.Pupa@FloridaDEP.gov>; Hurd, Jacqueline <Jacqueline.Hurd@FloridaDEP.gov>; Marion, Krista <Krista.Marion@FloridaDEP.gov>

Subject: FW: City Park DRI Application for Development Approval (ADA)

Importance: High

Good afternoon Lindsay,

I would like to bring this to your attention to confirm whether this project has already been reviewed under the Clearinghouse. Mrs. Lerch reached out to me requesting FDEP's position regarding this project, and I wanted to loop you in to check on its current status. I explained to her that the Department would not issue a blanket approval letter, as the project will be subject to multiple permits as part of our review process.

Kind regards,

Norva Blandin, MSEM

Permitting Program Administrator

Florida Department of Environmental Protection

Southeast District – West Palm Beach

[3301 Gun Club Road](#), MSC 7210-1

West Palm Beach, FL 33406

Norva.Blandin@floridadep.gov

Office: 561.681.6728

Main: 561.681.6600

Fax: 561-681-6755

Error! Filename not specified.

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<https://floridadep.gov/southeast>

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From: Kathe Lerch <klerch@sfrpc.com>

Sent: Tuesday, October 7, 2025 3:34 PM

To: Bouza, Eddy <Eddy.Bouza@FloridaDEP.gov>; Andreotta, Jason <Jason.Andreotta@FloridaDEP.gov>; Blandin, Norva <Norva.Blandin@FloridaDEP.gov>; Moore, Jon W <Jon.W.Moore@FloridaDEP.gov>

Subject: City Park DRI Application for Development Approval (ADA)

Importance: High

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Dear Federal, State, Regional, Local Governments, and Agencies,

On October 6, 2025, the Applicant (Parkland West, LLC, the Krome Groves Land Trust, Edward W. Easton, Trustee, and Guherqui International, S.A.) filed its ADA (Form DEO-BCP-ADA-1) with the South Florida Regional Planning Council and Miami-Dade County. The SFRPC and Applicant executed an Agreement to Delete. The Agreement to Delete specifies which ADA Questions the Applicant will answer, as well as the methodologies, data sources, and assumptions that will be used by the Applicant. The Agreement to Delete was developed with input from federal, state, regional, and local government partners. The link provides access to PDFs comprising the ADA as well as a copy of the Agreement to Delete.

WE NEED YOUR AGENCY'S DESIGNATED REPRESENTATIVE TO RECOMMEND IN WRITING NO LATER THAN WEDNESDAY, NOVEMBER 5, 2025, WHETHER THE ADA DOES OR DOES NOT MEET "SUFFICIENCY." IF THE ADA DOES NOT MEET "SUFFICIENCY," PLEASE submit YOUR AGENCY'S BASIS FOR THE RECOMMENDATION AS WELL AS ANY EXPLANATORY comments to the APPLICANT (GPENN@BRZONINGLAW.COM), at the same time the RECOMMENDATION AND comments are submitted to THE COUNCIL (sfadmin@sfrpc.com) so that the applicant can begin to prepare a response. THE COUNCIL WILL MAKE ITS formal sufficiency determination ON NOVEMBER 20, 2025.

The following link provides access to PDFs comprising the ADA as well as a copy of the Agreement to Delete. <https://sfregionalcouncil.org/city-park-dri-review-materials/>

Please note that an ADA is considered Sufficient if the Applicant answered the required questions using the prescribed methodologies, data sources, and assumptions. Rule 73C-40.022(3)(a), Florida Administrative Code (F.A.C.) states: "information should be considered sufficient when it has been presented in a manner which allows the reviewing agencies to assess the impacts of the proposed development. A determination of sufficiency does not necessarily indicate that the regional planning agency or other reviewing agencies agree with the information and conclusions presented in the application."

If you have any clarifying questions about the Sufficiency Review Process, DRIs, or other matters that may facilitate your Agency's recommendation, please email sfadmin@sfrpc.com.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020


954.924.3653 (o) | klerch@sfrpc.com

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 [Dep Customer Survey](#)

From: [Jeffries, Ken](#)
To: [Isabel Cosio Carballo](#)
Cc: [Iglesias, Daniel](#); [Solaun, Heidi](#); [Huynh, Dat](#); [Christina Miskis](#); [Carver, Jennifer](#); [Yee Fong, Shereen](#); [Kathe Lerch](#); [SFRPC Admin](#)
Subject: RE: City Park DRI Application for Development Approval (ADA)
Date: Friday, October 31, 2025 8:52:37 AM
Attachments: [image009.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)

Hi Isabel - The Department has reviewed the submitted information, dated September 9, 2025, for the City Park DRI. The Department has the statutory responsibility to review and provide comments upon DRIs and their transportation impacts upon regionally significant roadways including Strategic Intermodal System (SIS) facilities, such as SR 997/Krome Avenue.

The City Park DRI is bounded by SW 136th Street (Howard Drive) to the north, SW 152nd Street (Coral Reef Drive) to the south, SW 162nd Avenue to the east, and SR 977/Krome Avenue (SW 177th Avenue) to the west and is currently outside of the County's urban development boundary (UDB). Overall, the DRI at buildout will generate 4,817 new external PM peak-hour trips.

The submitted traffic study failed to contain intersection analyses or proposed mitigation improvements for significantly impacted roadway segments and intersections. The Applicant acknowledged that this information would not be submitted until the review of the segment analysis is found sufficient. Nevertheless, because the required information was not contained in the submitted documentation, the Department finds the City Park DRI ADA to be insufficient. The Department requests that additional information be provided. We are available if the Applicant wishes to resolve any outstanding concerns.

Technical Comments

1. The Department has reviewed the roadway segment analysis for the City Park DRI. No substantial comments are offered at this time.
2. Please note that in the submitted transportation analysis text, figures, and tabular references to all state roadway facilities should include the state road number (e.g., SW 177 Avenue should also be reference as "SR 997/Krome Avenue") to avoid confusion and improve clarity regarding jurisdiction. Please add these labels.

The Applicant must coordinate with FDOT regarding proposed access to SR 997/Krome Avenue. SW 136 Street on the east side of SR 997/Krome Avenue (which is currently unsignalized) is offset from the west approach of SW 136 Street (which is currently signalized). It is FDOT's position that a properly aligned 4-legged signalized intersection

is the optimal configuration.

Let me know if you have any questions. Thx Ken

Kenneth Jeffries
District Six Transportation Planning Manager
Planning and Environmental Management Office
Florida Department of Transportation, District 6
Adam Leigh Cann Building
1000 NW 111th Avenue, Room 6111
Miami, Florida 33172

Phone: (305) 470-5445, Fax: (305) 470-5205

E-mail: ken.jeffries@dot.state.fl.us



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AND FOSTERING POSITIVE RELATIONSHIPS AT EVERY LEVEL
WHILE EMPOWERING OUR TEAMS
WITH TRANSPARENT AND INTENTIONAL COMMUNICATION

From: Kathe Lerch <klerch@sfrpc.com>

Sent: Wednesday, October 29, 2025 3:06 PM

To: Jason.Andreotta@FloridaDEP.gov; Norva.Blandin@FloridaDEP.gov;
Jon.W.Moore@FloridaDEP.gov; compplans@freshfromflorida.com; Kathy.Mears@fdacs.gov; Yee
Fong, Shereen <Shereen.YeeFong@dot.state.fl.us>; Iglesias, Daniel <Daniel.Iglesias@dot.state.fl.us>;
Jeffries, Ken <Ken.Jeffries@dot.state.fl.us>; John.McWilliams@kimley-horn.com; Huynh, Dat
<Dat.Huynh@dot.state.fl.us>; Eric.Penfield@exp.com; ConservationPlanningServices@myfwc.com;
Cucinella, Josh <Josh.Cucinella@myfwc.com>

Subject: City Park DRI Application for Development Approval (ADA)

Importance: High

EXTERNAL SENDER: Use caution with links and attachments.

Dear Federal, State, Regional, Local Governments, and Agencies,

This is a friendly reminder that the South Florida Regional Planning Council is currently requesting comments from review agencies by **Wednesday, November 5th**, which can be sent via email, on whether or not the City Park DRI submission meets the threshold for 'sufficiency'. This is a follow-up from an email sent on October 7th, 2025. Should

clarification be needed: “sufficiency” means the City Park Development of Regional Impact (DRI) Application for Development Approval (ADA):

1. Answers the ADA Questions (and components) listed in the Agreement to Delete.
2. Uses the methodologies, data sources, and assumptions (with backup) specified for the Questions (and any components) in the Agreement.
3. Uses professionally accepted methodologies if a specific methodology is not referenced in the Agreement.

If the ADA does not include sufficient information, please note what was not provided and any suggestions for how the Applicant could redress. Please include page numbers and/or another method as references.

The following link provides access to PDFs comprising the ADA, as well as a copy of the Agreement to Delete. <https://sfregionalcouncil.org/city-park-dri-review-materials/>

Please let us know if you have any further questions or require additional clarification at sfadmin@sfrpc.com.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | klerch@sfrpc.com



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November 17, 2025

Ms. Kathe Ann Lerch
Director of Administration
South Florida Regional Planning Council
1 Oakwood Boulevard, Suite 250
Hollywood, Florida 33020

Re: City Park Application for Development Approval
File No. ADA 11-25-001

Dear Ms. Lerch,

FloridaCommerce has completed its review of the first sufficiency response for the proposed City Park Development of Regional Impact (DRI) Application for Development Approval (ADA). The Department's review has identified several issues which need further clarification in the ADA. The following are the questions and issues regarding the general project description and transportation that should be clarified and/or addressed by the applicant.

Question 10 – General Project Description

- 1) Policy LU-8G in the Future Land Use Element of Miami-Dade County's comprehensive plan (CDMP) states that land designated as Agriculture on the Land Use Plan Map should be avoided when considering land areas to add to the County's Urban Development Boundary (UDB). The subject property is currently designated as Agriculture and the application does not provide any information demonstrating the proposed development is consistent with this policy in the comprehensive plan. The CDMP Future Land Use Map also includes the 2040 Urban Expansion Area (UEA) Boundary, which depicts areas where current projections indicate further urban development beyond the 2030 UDB may be warranted between the year 2030 and 2040. The subject property is not located within the UEA, and the application does not provide sufficient information to demonstrate moving the UDB outside of the areas already identified in the UEA is consistent with the comprehensive plan. Please provide additional data and analysis demonstrating how the proposed development is consistent with the requirements to relocate the UDB.
- 2) Will data centers be an allowable use within the master-planned development?

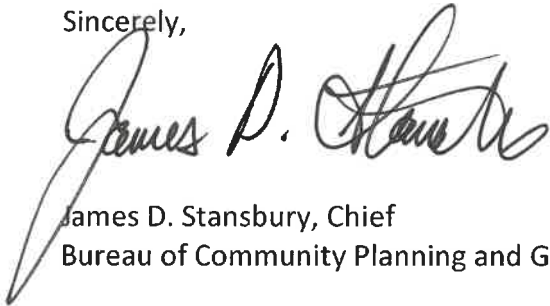
Question 21 – Transportation

- 1) Several sections remain either completely or partially unanswered because the transportation analysis is not yet finished. Therefore, Department staff cannot conduct a complete review of this proposal until all necessary transportation information is supplied and the following relevant sections are updated:

A.5: Existing Traffic Conditions
D.2: Future Background Traffic
E.3: Project Impacts on Regionally Significant Roadways
H: Protection of Transportation Corridors

If you have any questions concerning this review, please contact Christina Nazaire by telephone at (850)-717-8532 or by email at Christina.Nazaire@Commerce.fl.gov.

Sincerely,



James D. Stansbury, Chief
Bureau of Community Planning and Growth

JDS/cn

cc: Graham Penn, Bercow Radell Fernandez Larkin + Tapanes Law Firm

From: [DiGruttolo, Laura](#)
To: [Kathe Lerch](#)
Cc: [Colletier, Nicolas](#); [Gruver, Pamela](#); [Baysinger, Samantha](#); [Conservation Planning Services](#); [SFRPC Admin](#); gpenn@brzoninglaw.com
Subject: FWC's Comments: City Park DRI Application for Development Approval (ADA)
Date: Tuesday, November 4, 2025 11:51:45 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

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Dear Ms. Lerch:

Florida Fish and Wildlife Conservation Commission (FWC) staff reviewed the proposed City Park Development of Regional Impact application materials in accordance with our authorities under Chapter 379, Florida Statutes. We have no comments, recommendations, or objections related to listed species and their habitat or other fish and wildlife resources to offer on the application at this time.

FWC staff appreciates the opportunity to review this project. Please send any requests for further information to ConservationPlanningServices@MyFWC.com.

Sincerely,

Laura DiGruttolo
Land Use Planning Program Supervisor
Office of Conservation Planning Services
Florida Fish and Wildlife Conservation Commission
1875 Orange Avenue East
Tallahassee, FL 32311
(850) 728-5147

City Park DRI_64110

From: SFRPC Admin <sfadmin@sfrpc.com>
Sent: Tuesday, October 7, 2025 3:50 PM
To: Conservation Planning Services <conservationplanningservices@MyFWC.com>; Cucinella, Josh <Josh.Cucinella@MyFWC.com>
Subject: City Park DRI Application for Development Approval (ADA)
Importance: High

[EXTERNAL SENDER] Use Caution opening links or attachments

Dear Federal, State, Regional, Local Governments, and Agencies,

On October 6, 2025, the Applicant (Parkland West, LLC, the Krome Groves Land Trust, Edward W. Easton, Trustee, and Guherqui International, S.A.) filed its ADA (Form DEO-BCP-ADA-1) with the South Florida Regional Planning Council and Miami-Dade County. The SFRPC and Applicant executed an Agreement to Delete. The Agreement to Delete specifies which ADA Questions the Applicant will answer, as well as the methodologies, data sources, and assumptions that will be used by the Applicant. The Agreement to Delete was developed with input from federal, state, regional, and local government partners. The link provides access to PDFs comprising the ADA as well as a copy of the Agreement to Delete.

WE NEED YOUR AGENCY'S DESIGNATED REPRESENTATIVE TO RECOMMEND IN WRITING NO LATER THAN **WEDNESDAY, NOVEMBER 5, 2025**, WHETHER THE ADA DOES OR DOES NOT MEET "SUFFICIENCY." IF THE ADA DOES NOT MEET "SUFFICIENCY," PLEASE SUBMIT YOUR AGENCY'S BASIS FOR THE RECOMMENDATION AS WELL AS ANY EXPLANATORY COMMENTS TO THE APPLICANT (GPENN@BRZONINGLAW.COM), AT THE SAME TIME THE RECOMMENDATION AND COMMENTS ARE SUBMITTED TO THE COUNCIL (SFADMIN@SFRPC.COM) SO THAT THE APPLICANT CAN BEGIN TO PREPARE A RESPONSE. THE COUNCIL WILL MAKE ITS FORMAL SUFFICIENCY DETERMINATION ON NOVEMBER 20, 2025.

THE FOLLOWING LINK PROVIDES ACCESS TO PDFS COMPRISING THE ADA AS WELL AS A COPY OF THE AGREEMENT TO DELETE. [HTTPS://SFREGIONALCOUNCIL.ORG/CITY-PARK-DRI-REVIEW-MATERIALS/](https://sfregionalcouncil.org/city-park-dri-review-materials/)

Please note that an ADA is considered Sufficient if the Applicant answered the required questions using the prescribed methodologies, data sources, and assumptions. Rule 73C-40.022(3)(a), Florida Administrative Code (F.A.C.) states: "information should be considered sufficient when it has been presented in a manner which allows the reviewing agencies to assess the impacts of the proposed development. A determination of sufficiency does not necessarily indicate that the regional planning agency or other reviewing agencies agree with the information and conclusions presented in the application."

If you have any clarifying questions about the Sufficiency Review Process, DRIs, or other matters that may facilitate your Agency's recommendation, please email sfadmin@sfrpc.com.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | klerch@sfrpc.com



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From: [Kevin Brown](#)
To: [Kathe Lerch](#); [Christina Miskis](#)
Cc: [Andres Berisiartu](#); [Ytve Guerrero](#); [Govardhan Muthyalagari](#); [Mayra Diaz](#); [Claudio Diaferia](#)
Subject: RE: City Park DRI Application for Development Approval (ADA) - GMX
Date: Friday, November 14, 2025 7:14:12 PM
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[GMX_Misc_Planning_City_Park_DRI_Application_for_Development_Approval_\(ADA\)_Review_20251114.pdf](#)

Good evening Kathe and Christina,

On behalf of GMX, please find the attached feedback in response to the City Park DRI Application for Development Approval (ADA).

In GMX's opinion, the ADA does not provide sufficient information to fully assess the transportation impacts of the City Park development.

Please let us know if you have any questions or require additional information.

Regards,

Kevin Brown, PE

Greater Miami Expressway Agency (GMX) GEC Program Director

Tel (305) 222-1443 Cell (305) 479-0365 Email kebrown@hntb.com

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From: Kathe Lerch <klerch@sfrpc.com>
Sent: Wednesday, October 29, 2025 3:15 PM
To: Rafael S. Garcia <rsgarcia@gmx-way.com>; Mayra Diaz <mdiaz@gmx-way.com>; Claudio Diaferia <cdiaferia@gmx-way.com>; Kevin Brown <kebrown@hntb.com>; aileen.boucle@mdtpo.org; oscar.camejo@mdtpo.org; Maria.Vilches@miamidade.gov; Christopher.Rosenberg@miamidade.gov; Franchesca.Taylor@miamidade.gov; Vanessa.Spatafora@miamidade.gov
Subject: City Park DRI Application for Development Approval (ADA)
Importance: High

Dear Federal, State, Regional, Local Governments, and Agencies,

This is a friendly reminder that the South Florida Regional Planning Council is currently requesting comments from review agencies by **Wednesday, November 5th**, which can be sent via email, on whether or not the City Park DRI submission meets the threshold for 'sufficiency'. This is a follow-up from an email sent on October 7th, 2025. Should clarification be needed: "sufficiency" means the City Park Development of Regional

Impact (DRI) Application for Development Approval (ADA):

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Please let us know if you have any further questions or require additional clarification at sfadmin@sfrpc.com.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | klerch@sfrpc.com



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REVIEW COMMENTS



Prepared by: HNTB

Prepared for: The Greater Miami Expressway Authority

**Title of Document Reviewed: City Park DRI Application for Development Approval
(ADA) Transportation Component**

Name of Development: City Park

Overview

The Development of Regional Impact (DRI) Application for Development Approval (ADA) for the proposed City Park project was reviewed on behalf of GMX.

Findings and Comments

1. **Kendall Parkway was deliberately excluded** from trip assignment or impact testing because the capacity of the SR 836 extension is not available for the use of any new development. This approach is consistent with the CDMP Amendment restrictions for Kendall Parkway.
2. The ADA identifies SR 874 as a regional facility expected to attract trips generated by the proposed development. However, based on the data presented, the number of trips assigned to SR 874 appears low, leading the analysis to conclude that SR 874 is not an 'impacted roadway' under the 5.0% significance threshold, which defines an impact as project traffic equal to or exceeding 5% of the adopted PM peak-hour maximum service volume.

The estimated PM peak-hour increase of only 125–150 southbound trips on SR 874/Don Shula Expressway (Table 21.E.1) seems unrealistically low for a 990-acre development containing 7,800 dwelling units and more than 2 million square feet of retail, industrial, warehouse, and office uses. This may indicate a broader underestimation of traffic impacts within the analysis.

3. The applicant must provide all the SERPM model files for the project trip assignments review that were used to determine compliance with this 5.0% rule provided in Table 21.A.2.
4. The applicant did not conduct an AM peak-hour analysis, which is essential for evaluating potential traffic impacts on local roads and adjacent neighborhoods, particularly given the presence of a middle school and an elementary school located three blocks apart along SW 144th Street. Without this analysis, the study cannot adequately assess congestion or operational issues on the existing roadway network that would serve the proposed development. Additionally, little to no information is provided on the traffic impacts to key access roadways, including SW 162nd Avenue, SW 157th Avenue, SW 144th Street, and SW 152nd Street. The final transportation analysis must include a comprehensive AM peak-hour assessment and complete impact evaluation of these roadways.

The methodology should also require the AM peak hour assessment.

5. The proposed development includes three access points across the CSX rail tracks (Map J-G1). However, the analysis does not include a scenario without these crossings to assess

potential impacts on the remaining access points and the existing connecting roadway network.

6. The PM peak period of 4 PM to 6 PM used in the traffic impact analysis does not reflect actual peak conditions in the southwest area of the county, where congestion typically extends beyond 7 PM.
7. The projected increases in traffic on existing local roadways providing direct access to the proposed development, such as SW 162nd Avenue south of SW 136th Street (12–25 additional PM peak trips), SW 157th Avenue south of SW 136th Street (250 additional trips), and SW 136th Street (175 additional trips) appear unreasonably low. Given the scale of the proposed development, these estimates likely underestimate the true traffic impacts on the local roadway network.
8. SW 144th Street, which is the only existing access to the proposed development from the east, was not included in the analysis. SW 144th Street and SW 157th Avenue would serve as the only eastern access points to the development. Both roadways provide primary access to established residential communities and experience significant congestion during the AM peak period, which was not evaluated in the study.

Conclusion

1. The submittal **does not** meet the definition of “**sufficient**” per Rule 73C-40.022(3)(a), F.A.C., as it does not provide information adequate for reviewing agencies to fully assess transportation impacts.
2. Although no trips were assigned to the future Kendall Parkway/SR 836 Southwest Extension, GMX requests continued coordination for information and planning consistency as the site development process advances.

From: [John Bartus](#)
To: [Kathe Lerch](#)
Cc: [Silvia Roussin](#)
Subject: City Park DRI ADA: Key Colony Beach comments
Date: Tuesday, November 4, 2025 2:15:42 PM

Kathe,

The City Commission of Key Colony Beach is not adopting a formal position on the DRI application for City Park. Thank you for reaching out, and let me know if I may be of further assistance.

Thank you,

John Bartus

City Administrator
City of Key Colony Beach
305.849.0273 cell
305.289.1212 ext.2

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If you are an entity authorized to provide confidential information to a government entity, please indicate the exemption to Florida Chapter 119 and verify its applicability before sending. If you are authorized to receive confidential information from the City of Key Colony Beach it will be so noted and with the statutory exemption applicable. Exempt material retransmission or disclosure is governed by Florida Law. The recipient is charged with compliance regarding any retransmission or disclosure. The City of Key Colony Beach shall not be liable for any inappropriate retransmission or disclosure.

From: [Dambach, Alex \(RER\)](#)
To: [Kathe Lerch](#); [Bob Cambric](#); [Isabel Cosio Carballo](#); [Christina Miskis](#)
Cc: [Damian de la Paz, Jorge \(Office of the Mayor\)](#); [Jacob, Samantha J. \(Office of the Mayor\)](#); [Alcala, Tomas \(Office of the Mayor\)](#); [Spadafina, Lisa \(DERM\)](#); [Istambouli, Rashid \(DERM\)](#); [Velazquez, Christine \(RER\)](#); [Coley, Roy \(Office of the Mayor\)](#); [Ferguson, James \(WASD\)](#); [Valdes, Maria A. \(WASD\)](#); [Aranguiz-Cueto, Marisela \(WASD\)](#); [Brito, Joann \(WASD\)](#); [Roque, Rolando M. \(WASD\)](#); [Shared Mailbox - Gomez, Patricia \(RER\)](#); [Parra, Loren \(DERM\)](#); [Brown, Kimberly \(RER\)](#); [Gomez, Lourdes \(RER\)](#); [Silva, Eric \(RER\)](#); [Bell, Jerry \(RER\)](#); [Armada, Manuel \(RER\)](#); [LaPradd, Charles \(RER\)](#); [Guim, Raquel \(RER\)](#); [Sandanasamy, Vinod \(RER\)](#); [Arbelaez, Francisco \(DTPW\)](#); [Jones, Sharon \(DEM\)](#); [Steenburg, Maggie \(DEM\)](#); [Gonzalez, Mirtha \(DEM\)](#); [Colmenares, Lisa \(DTPW\)](#); [Spatafora, Vanessa \(TPO\)](#); [Vilches, Maria Teresita \(TPO\)](#); [Sandanasamy, Vinod \(RER\)](#); [Armada, Manuel \(RER\)](#); [Rowe, Garrett A. \(RER\)](#); [Bell, Jerry \(RER\)](#); [Guim, Raquel \(RER\)](#); [Rincon, Ninfa \(RER\)](#); [Stillings, Noel \(RER\)](#); [Arce, Anamersy \(DTPW\)](#)
Subject: RE: City Park DRI Application for Development Approval (ADA)
Date: Wednesday, November 12, 2025 5:31:55 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[City Park ADA Deficiency Review coordinated final to send 11-12-25.pdf](#)

Dear SFRPC Team:

Please find attached the deficiency review comments compiled from various County agencies regarding the ADA for City Park. Thank you for working with us on logistics and scheduling to get this document finalized. Please let me know if you have any questions. Thank you.

Alex Dambach, AICP
Planning Development Manager,
Plan Implementation and Special Projects
Planning Division
Regulatory and Economic Resources
111 NW 1 Street, 12 Floor
Miami, FL 33128
305-375-2811
305-889-8834

From: Kathe Lerch <klerch@sfrpc.com>
Sent: Wednesday, October 29, 2025 3:10 PM
To: Jorge.DamiandelaPaz@miamidade.gov; [Jacob, Samantha J. \(Office of the Mayor\)](mailto:Jacob.SamanthaJ@miamidade.gov); [Alcala, Tomas \(Office of the Mayor\)](mailto:Alcala.Tomas@miamidade.gov); [Spadafina, Lisa \(DERM\)](mailto:Lisa.Spadafina@miamidade.gov); [Istambouli, Rashid \(DERM\)](mailto:Rashid.Istambouli@miamidade.gov); [Velazquez, Christine \(RER\)](mailto:Christine.Velazquez@miamidade.gov); [Coley, Roy \(Office of the Mayor\)](mailto:Roy.Coley@miamidade.gov); [Ferguson, James \(WASD\)](mailto:James.Ferguson@miamidade.gov); [Valdes, Maria A. \(WASD\)](mailto:Maria.Valdes@miamidade.gov); [Aranguiz-Cueto, Marisela \(WASD\)](mailto:Marisela.Aranguiz@miamidade.gov); [Brito, Joann \(WASD\)](mailto:Joann.Brito@miamidade.gov); [Roque, Rolando M. \(WASD\)](mailto:Rolando.Roque@miamidade.gov); [Shared Mailbox - Gomez, Patricia \(RER\)](mailto:Patricia.Gomez@miamidade.gov); [Parra, Loren \(DERM\)](mailto:Loren.Parra@miamidade.gov); [Brown, Kimberly \(RER\)](mailto:Brown.Kimberly@miamidade.gov); [Gomez, Lourdes \(RER\)](mailto:Gomez.Lourdes@miamidade.gov); [Silva, Eric \(RER\)](mailto:Eric.Silva@miamidade.gov); [Bell, Jerry \(RER\)](mailto:Jerry.Bell@miamidade.gov); [Armada, Manuel \(RER\)](mailto:Manuel.Armada@miamidade.gov); [LaPradd, Charles \(RER\)](mailto:Charles.LaPradd@miamidade.gov); [Guim, Raquel \(RER\)](mailto:Raquel.Guim@miamidade.gov); [Sandanasamy, Vinod \(RER\)](mailto:Vinod.Sandanasamy@miamidade.gov); [Arbelaez, Francisco \(DTPW\)](mailto:Francisco.Arbelaez@miamidade.gov); [Jones, Sharon \(DEM\)](mailto:Sharon.Jones@miamidade.gov); [Steenburg, Maggie \(DEM\)](mailto:Maggie.Steenburg@miamidade.gov); [Gonzalez, Mirtha \(DEM\)](mailto:Mirtha.Gonzalez@miamidade.gov); [Colmenares, Lisa \(DTPW\)](mailto:Lisa.Colmenares@miamidade.gov); [Spatafora, Vanessa \(TPO\)](mailto:Vanessa.Spatafora@miamidade.gov); [Vilches, Maria Teresita \(TPO\)](mailto:MariaTeresita.Vilches@miamidade.gov); [Sandanasamy, Vinod \(RER\)](mailto:Vinod.Sandanasamy@miamidade.gov); [Armada, Manuel \(RER\)](mailto:Manuel.Armada@miamidade.gov); [Rowe, Garrett A. \(RER\)](mailto:GarrettA.Rowe@miamidade.gov); [Bell, Jerry \(RER\)](mailto:Jerry.Bell@miamidade.gov); [Guim, Raquel \(RER\)](mailto:Raquel.Guim@miamidade.gov); [Rincon, Ninfa \(RER\)](mailto:Ninfa.Rincon@miamidade.gov); [Stillings, Noel \(RER\)](mailto:Noel.Stillings@miamidade.gov); [Arce, Anamersy \(DTPW\)](mailto:Anamersy.Arce@miamidade.gov)

Kimberly (RER) <kimberly.brown@miamidade.gov>; Gomez, Lourdes (RER) <Lourdes.Gomez@miamidade.gov>; Silva, Eric (RER) <eric.silva@miamidade.gov>; Bell, Jerry (RER) <jerry.bell@miamidade.gov>; Armada, Manuel (RER) <MAV@miamidade.gov>; LaPradd, Charles (RER) <charles.lapradd@miamidade.gov>; Guim, Raquel (RER) <Raquel.Guim@miamidade.gov>; Sandanasamy, Vinod (RER) <vinod.sandanasamy@miamidade.gov>; Dambach, Alex (RER) <alexander.dambach@miamidade.gov>

Subject: City Park DRI Application for Development Approval (ADA)

Dear Federal, State, Regional, Local Governments, and Agencies,

This is a friendly reminder that the South Florida Regional Planning Council is currently requesting comments from review agencies by **Wednesday, November 5th**, which can be sent via email, on whether or not the City Park DRI submission meets the threshold for 'sufficiency'. This is a follow-up from an email sent on October 7th, 2025. Should clarification be needed: "sufficiency" means the City Park Development of Regional Impact (DRI) Application for Development Approval (ADA):

1. Answers the ADA Questions (and components) listed in the Agreement to Delete.
2. Uses the methodologies, data sources, and assumptions (with backup) specified for the Questions (and any components) in the Agreement.
3. Uses professionally accepted methodologies if a specific methodology is not referenced in the Agreement.

If the ADA does not include sufficient information, please note what was not provided and any suggestions for how the Applicant could redress. Please include page numbers and/or another method as references.

The following link provides access to PDFs comprising the ADA, as well as a copy of the Agreement to Delete. <https://sfregionalcouncil.org/city-park-dri-review-materials/>

Please let us know if you have any further questions or require additional clarification at sfadmin@sfrpc.com.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020
954.924.3653 (o) | klerch@sfrpc.com



South Florida Regional Planning Council

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Memorandum



Date: November 12, 2025

To: Isabel Cosio Carballo, MPA, Executive
Director South Florida Regional
Planning Council

From: Alex Dambach, AICP, Planning Development Manager 

Department of Regulatory and Economic Resources (RER)

Subject: Sufficiency Review of City Park DRI Applicant's Application for Development
Approval dated October 2, 2025

Various County agencies reviewed the City Park Application for Development Approval dated October 2, 2025, that was disseminated for review by the South Florida Regional Planning Council to various agencies as well as the Miami-Dade Transportation Planning Organization (TPO) on October 7, 2025. Below are the comments. These findings do not represent any assessment, determination, or conclusion regarding consistency of this application with the Comprehensive Development Master Plan (CDMP), the Zoning Ordinance, nor any other statutory requirements. The following are findings of deficiency for this application.

The Miami-Dade Water and Sewer Department and this Department's Code Coordination & Environmental Initiatives Division find the Application for Development Approval to be deficient and note that additional information is required:

- After reviewing the proposed development program presented in the application, inconsistencies in the total number of units for the breakdown of the residential components were found between the DRI ADA Question 10 -Table 10.A.1, and the DRI ADA Question 17-Table 17-1.
- In order to calculate the water/sewer demand, clarification is needed for the breakdown of the residential development units, as well as the total square footage of the schools and if any bathrooms will be included in the park.
- The development breakdown by Village is also required to assess the impact on the water and sewer infrastructure.
- Per Chapter 24 of the Miami-Dade County Code, the water/sewer demand for schools is calculated based on square footage and not the number of students, as noted in Table 17-1, and needs to be revised.

Specifically Regarding Water Control (Attachment 19-1)

The Water Control Section of the Department of Regulatory and Economic Resources has reviewed "Attachment 19-1: Conceptual Stormwater Management Master Plan," signed and sealed by Michael P. Carr, P.E., dated August 22, 2025. Prior to CDMP approval, the application must demonstrate consistency with Objectives CON-4 and CON-5. The report has the following deficiencies that must be addressed:

- Page 28 of 41, "Stage vs. Storage Calculations," must remove the storage attributed to the building (Column 8) from the 100-year/3-day flood-routing calculation.
- Provide the conceptual location of the proposed 66-acre lake(s).
- Provide the conceptual location of the proposed 56 acres of parks.
- The project is assumed to discharge to the lake(s). However, the report does not acknowledge that the land use (former agricultural lands) requires an environmental assessment, and that the use of lakes for stormwater retention may be limited due to potential contamination. Revise the report to acknowledge the potential presence of contamination and the resulting limitations.
- The report states that exfiltration trenches will be designed for the 5-year, 1-hour storm event prior to discharge to the on-site wet-retention area, and runoff volumes are calculated with a 3.28-inch credit. This credit can only be granted if the exfiltration trenches are designed for the 5-year/1-day storm event. Revise the calculations accordingly.
- The exfiltration trench calculations on page 33 of 41 use a hydraulic conductivity (K) of 9.79E-04. Clarify the basis and assumptions for the selected K value, or provide a copy of the signed and sealed geotechnical report.
- The report does not address the canal reservations or the planned canal. The planned canal is assumed to provide flood protection within the area, including lands west and south of the proposed development. The conceptual stormwater master plan must demonstrate that the project will not diminish the level of flood protection, accounts for the planned canal, is not in conflict with it, will not interfere with the historic or required conveyance functions of stormwater infrastructure in the area, and explains how the planned canal's level of service will be maintained.
- The property is encumbered by two 130-foot-wide canal reservations along the western and southern boundaries, recorded in Miami-Dade County Official Record Book 7131, Page 561, and Official Record Book 7118, Page 390. Revise the report to acknowledge that no development can be approved within these canal reservations.

The Miami-Dade County Department of Regulatory and Economic Resources - Planning Division finds the Application for Development Approval to be deficient and notes that additional information is required:

Regarding the Application Overall

- Map C - Topographic must specify whether the contour elevations are measured in feet or another unit. Additionally, it must indicate the vertical datum used (e.g., NAVD88 or NGVD29). Lastly, the base flood elevation should be clearly identified on the map.
- Map G – Sampling Locations: Spell out "DTW".
- Page 10-1: The reported acreage is inconsistent between the DRI and the CDMF applications. Please clarify and confirm the correct gross and net acreage of the application site to ensure consistency across all documents submitted to the County and to SFRPC.
- Page 10-2: If the 7,800 units are designated for residential use, please clarify the number of residential units separately proposed for mixed-use development.
- Page 10-2: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed.

- The “Proposed Development Program” table, Table 10.A.1 does not show the mixed-use development program including number of units nor square footage of non-residential use.
- Page 10-3: Please provide studies, data, or supporting documentation demonstrating that the proposed development pattern will lead to a measurable reduction in reliance on all types of single-occupancy vehicles.
- Page 10-4: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed. Submit detailed information about this project.
- Page 10-4: Provide the maximum and average walking distance from the farthest residential units to their nearest commercial/infrastructure areas to serve resident daily-need land uses (e.g., grocery, pharmacy, school, transit stop). This information is essential to evaluate the walkability and functional integration of the proposed development.
- Page 10-5: The acreage shown in this page differs from the acreages shown in the CDMP application.
- Table 10-2: As stated previously, this table does not provide the number of residential units for the mixed-use component of the proposed development.
- Page 10-5: Please provide a land contamination assessment for the site. If the site is designated or suspected to be a brownfield, include documentation of its status, any remediation plans, and any coordination with applicable environmental agencies.
- Page 10-6: The trade area analysis does not appear to be centered on the actual proposed locations of the retail components within the site. Please resolve this.
- Page 10-8: A map of the Residential Market Area is needed.
- Page 10-9: Please explain why the County’s population projections are not used.
- Page 10-9: Is this total growth for the 30-year period specified? Furthermore, it is already 2025, so 10 years or 1/3 of that period has already passed. Please clarify.
- Page 10-9: Provide justification for the assumption that the RMA’s growth outlook will reach average annual growth rate in line with historical growth trends and even higher.
- Page 10-9: Include other developments occurring in the RMA and their projected population growth accommodation, including infill development on individual lots.
- Page 10-10: The population multiplier used is lower than the County’s population multiplier. The County multiplier for this Minor Statistical Area calculates a population of 22,296 people resulting from the proposed development.
- Page 10-11: It is necessary to estimate the typical salaries associated with the proposed job types to determine how many individuals earning those salaries would be able to afford housing within the proposed development. Also, please insert a closing parenthesis to the acronym “ICSC”.
- Page 10-17: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed.
- Page 10-18: The fact that the property is designated “Agriculture” does not address the specific need for expanding the UDB. The application should acknowledge that the site is in an area that “Should be Avoided” according to Policy LU-8G.

- Page 10-19: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur, as there is no indication of this project being proposed.
- Page 10-19: A comprehensive capacity analysis must demonstrate that existing infrastructure, such as water, sewer, transportation, and stormwater systems, can adequately serve the proposed development without degrading the level of service for existing communities.
- Page 10-19: Provide documentation that the application area is a 'transitional' agricultural zone.
- Page 10-27: Provide the list of infrastructure extensions (linear feet) and water/sewer flow. Also, see comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur, as there is no indication of this project being proposed.
- Page 10-29: Provide specific responses to Florida Statute 163.3177(9).
- Page 10-30: Provide a list and the locations of origins and destinations available in the development, and their distances from each other, to serve as evidence that they can be accessed by pedestrians within the development to eliminate or reduce the need for use of private automobiles.
- Page 10-31: Explain the phrase, "coordinated with programmed capital improvements" and identify which capital improvements are currently programmed to serve this site.
- Page 10-33: Application needs to use the Minor Statistical Area (MSA)-specific school and population multipliers.
- Page 11-1: Please provide an analysis of the potential impacts that the addition of 7,800 new dwelling units and associated commercial development, over a relatively short 10-year period, may have on residential and commercial property values within the surrounding trade area.
- Page 11-8: Are gas stations proposed as part of the development? Identify how many and where.
- Page 13-2: This question asks about proposed wetlands and not about mitigation banks. The question should be answered based on the proposed lakes, waterways, littoral plantings, etc. cited earlier, in accordance with sustainability practices.
- Page 17-1: The number of units in the water demand table is inconsistent with the development program.
- Table 17-1 is inconsistent with the development program.
- Table 18-1 is inconsistent with the development program.
- The Water and Sewer table in Attachment A contains an incorrect mix of residential units.
- The attached survey is illegible and lacks bearings and distances and match lines or a key map.
- Table 21.A.4: Row 2 states a bike lane would be widened from 2 to 4 lanes. This appears to be a typographical error.
- Table 21.A.4 and Table 21.A.5: Please note that Kendall Parkway – SR 836 is not to be considered for roadway mitigation.

- Page 21-17: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed.
- Page 21-17: Provide confirmation from Miami-Dade Transit that the level of service described therein will be provided.
- Page 21-18: See comments provided by TPO and DTPW, below. Details are needed to support the stated 5 percent reduction in vehicle trips.
- Table 21.B1: Regarding reduction rates, the Application needs to provide sound evidence that infrastructure will be provided and typical usage rates to support the stated rate of transit/ped usage.
- Page 21-20: Similar to the request for justification of the transit/ped reduction, detailed information based on actual behavior needs to show that this internal trip reduction is realistic.
- Page 21-40: Provide distances, methods of access to the identified existing transit stations/stops. This is for both regional and local transit.
- Map on Page 24-7: Provide documentation providing the basis for this map's depictions typical 20-minute travel times.
- Page 28-1: Show a map and typical travel times to the listed hospitals.
- No page number, section 29.E.b: Please explain why single-family dwellings are not included in the proposed commitment to use of cool roofs.
- No page number, section 29.i: Provide percentages of tree canopy proposed and SRI ratings (and coverage percentages) proposed for roofs and pavements.

Specifically Regarding Transportation (Question 21)

- Phasing of project: The project doesn't include phasing for short term and long term. County staff need two separate analyses to verify the short term and long-term traffic impacts of the City Park project.
- The work from home trips in Table 21.B1 has been calculated incorrectly. It is assumed as 9.8% of residential trips based on the ACS data. The ACS data is only commuting trips or Home-based work trips which makes up about 22% of overall trips within Miami-Dade County, hence the work from home trips should be 9.8% of 22%.
- The internal capture for school trips in Table 21.B1 is generally not supported by ITE, and the applicant is not providing reliable data source or case studies to support this deduction of trips.
- The traffic analysis includes only PM peak hour directional analysis. Staff require analysis of roadway conditions for two-way peak hour volumes. Additionally, roadway segment analysis should be performed for AM and PM peak hours. This is particularly crucial as roadways and intersections may exhibit capacity deficiencies in the AM peak but not during the PM peak. Analysis performed for both the AM and PM peak periods would ensure that needed mitigation treatments would not be missed.
- The traffic volumes to be considered should be the sum of existing counts plus the approved but unbuilt project trips plus the City Park project trips. Please include the development order trips in the analyses.

- The traffic study in Table 21.F.1 identifies the following offsite improvements for City Park DRI,
 - SW 136th Street from SW 167th Avenue to SW 157th Avenue; new 4 lane roadway. □
 - SW 152nd Street from SW 167th Avenue to SW 157th Avenue; new 4 lane roadway.
 - SW 157th Avenue from SW 120th Street to SW 136th Street; widen from 4 lanes to 6 lanes.
 - SW 147th Avenue from SW 184th Street to SW 200th Street, widen from 2 lanes to 4 lanes
 - SW 147th Avenue from SW 248th Street to SW 264th Street; widen from 2 lanes to 4 lanes.
 - SW 200th Street from SW 147th Avenue to SW 137th Avenue; widen from 2 lanes to 4 lanes.
 - SW 184th Street from SW 157th Avenue to SW 147th Avenue; widen from 2 lanes to 4 lanes.

The applicant states in the traffic study that the County should be responsible for the above improvements, however some of these roadways are outside the UDB, and thus would not be permitted to be constructed with public funds, and some of the others may not have not been fully funded and are lower in priority than other roadway improvements in the County, and may not occur within the project's development timeline. The applicant would need to address the possibility of these improvements not occurring.

- Please provide proportionate share calculations for the list of roadways that are impacted outside the project area that needs to be mitigated.
- Please include Mobility fee calculations in the traffic study.
- Since this project is outside the UDB, there are not enough count stations in this location. Staff will be requiring the applicant to collect 72-hour traffic counts during the weekday for some roadway segments surrounding the project site. The list of roadway segments for which traffic counts would be required will be submitted to the applicant later after a detailed review.
- At the railroad crossing locations, please clearly indicate the pavement markings, signings, and potential signal timing modifications to safely accommodate the train based on its expected schedule. Please share the information with CSX to get their concurrence.
- As distribution of project trips were done using the SERPM8 model, please include in the appendices the input and output data.

Specifically Regarding Housing (Question 24)

- *Incorrect Use of Income Thresholds:* The DRI ADA calculates the deficit of affordable housing units using HUD Income thresholds (see page 24-13). However, the ECFRPC Housing Methodology on page 2 #7 clearly states: "Please note: affordability is estimated using the actual income estimates, not the income thresholds for very low, low and moderate income."
- *Improper Wage Increment Groupings:* The wage ranges reported in the DRI ADA (on the unnamed pages following page 24-14) for office, industrial and education sectors are presented in \$1 dollar increments except for the final increments below each of the HUD income thresholds. According to the ECFRPC Housing Methodology on (page 12, Appendix D item#2), a constant increment must be used. The example provided uses \$2,500, which is also stated as the maximum allowable increment. In contrast, the ADA uses variable increments of over \$31,000 at the top of the moderate-income range. This skewed grouping

significantly distorts the calculation of affordable housing supply by wage levels.

- **Misapplication of the 5% Mitigation Allowance:** The Net Deficit figure of 320 units reported in the ADA (page 24-13) erroneously includes a “5% Mitigation Allowance.” The ECFRPC methodology provides no basis for such an allowance. If Table 24-B.11 had been calculated correctly, the actual deficit would be 710 units representing the housing need subject to mitigation. On page 4 of the ECFRPC Housing Methodology, under “Estimating Need” it states: “Compare final housing supply inventory figures with the estimation of housing demand. If there is not an adequate supply of affordable housing to meet the projected demand, the DRI must mitigate this impact.” The 5% figure is only used as a significance test to determine whether mitigation is required. The full section reads:

“Significance threshold: The project will be deemed to have a significant impact on the ability of the project’s employees to find adequate housing reasonably accessible to their places of employment when, for any phase or stage of development, the development’s cumulative housing need is projected to exceed 5 percent of the applicable DRI residential threshold for the affected local government, or 50 units, whichever is larger.”

There is no indication that this threshold constitutes an allowance. Furthermore, in the following section of the methodology titled “Mitigation,” it states:

“The affordable housing demand and supply calculations quantify the need for affordable housing for employees of a DRI. The DRI developer is required as a condition of development approval to mitigate that housing need.”

This reinforces that only the demand and supply calculations determine the need for mitigation and there is no form of allowance.

Specifically Regarding Education (Question 27)

- **Development Program:** Applicant’s Table 27-1 lists 1,029 single-family (detached) units, 4,532 townhomes and 2,239 multifamily units, totaling 7,800 residential units. The residential units are listed under a “students/unit” column, listing of 0.357 for single-family; 0.249 for single-family (detached) units, and 0.156 for multi-family. No source or footnotes are provided, nor is there any explanation of how these figures came to be, i.e. statewide averages, applicant’s own assumptions, etc. The rate listed in the “students/unit” column, presumably the student generation rate, falls short of the County’s student generation rate for that Minor Statistical Area. There are no high/low scenarios and range of scenarios presented to account for population and/or immigration shifts and other socio-economic factors. That would be essential in determining how close to the stated student capacity for each grade level, as only one scenario is presented and thus determined the proposed schools would also be donor schools for adjacent existing public schools, as outlined in applicant’s Table 27-2.
- This Table 27-1 lists a total student population of 1,847 students, which is not consistent with the 3,041 student figure cited in Table 10 – Part III.1, and which footnote identifies as the ACS 2023, presumably the U.S. Census American Community Survey figures. The difference between the two figures cited and methodologies used to arrive at those figures must be outlined by the applicant. In addition to the lack of stated methodology, the impact of magnet and charter schools in the County is not factored in or taken into account.
- The applicant’s development program, previously outlined and repeated for emphasis, consists of: 1,029 single-family (detached) units, 4,532 townhomes and 2,239 multifamily units, totaling 7,800 residential units. That analysis was not included in Exhibit 27-1, the October 1, 2025 letter by The Curtis Group sent to Miami-Dade County Public Schools

(MDCPS). Instead, the proposed development program consists of: 2,100 single-family (detached) units; 2,100 townhomes, and 2,000 multifamily units, totaling 6,200 units. The applicant needs to demonstrate consistency between stated development proposal versus the “alternative” program sent to MDCPS.

- Furthermore, the applicant’s stated development program is cited in Table 11-2, albeit with a timetable ranging from 51-154 single-family detached residences, built on an average yearly basis between years 2027-2036. Single-family detached residences range between 227-680 yearly, with multifamily at a range of 112-336. What is not specified is if the applicant’s three proposed schools will be built out for the full capacity, or if the applicant envisions adding student stations and/or corresponding facilities on this same yearly timetable.
- *Site Location:* In the previous review comments sent to the applicant, it was pointed out that the applicant’s “Concept Land Plan” depicts locations of three schools, located in the northwest, south, and southeast portions of the application site. The applicant’s “Map H Master Development Plan” still shows “School” listed in the northwest, south, and southeast portions. The CDMP Education Element Policy EDU-3A states that high schools should be located within one (1) mile inside the UDB, with middle schools located ½ mile and elementary schools at ¼ mile. The northwest, south, and southeast school sites depicted appear ±.23, ±.57, and ±1.3 miles from the proposed UDB expansion. If an elementary school is to be located in the northwest portion, it would not be in compliance with Policy EDU-3A, and may need to be reconfigured, and in coordination with MDCPS. CDMP Educational Element policies EDU-3D, EDU-3E, EDU-3F and EDU-3G contain site specific criteria policies such as size, compatibility and access, for MDCPS to consider when reviewing a possible school site.

Moreover, since the passage of SB 7026, Marjory Stoneman Douglas High School Public Safety Act and subsequent legislation, school site and safety considerations must be taken into account. As well as staffing considerations, there are SB 7026 criteria requiring school safety staffing which would need to be evaluated. Objective EDU-4 and Policies EDU-4A, EDU-4B, EDU-4E outline the County coordination with other County and appropriate agencies to address school safety and siting issues. To date, aside from the applicant’s correspondence included in Exhibit 27-1, there is no evidence that any further outreach to MDCPS has been undertaken.

In the event there are any environmental constraints in land proposed to be donated to MDCPS, a wildlife survey and analysis of possible contamination from any agricultural activities needs to be presented to MDCPS.

- *Lack of a Legally Binding Commitment:* Of note, there is no binding commitment in the form of a legal recordable instrument, such as a covenant, by the applicant to provide for the total number as-yet-to-be-determined number of student stations in each of the proposed public schools.. There are partial sentences sprinkled through the applicant’s documentation alluding to this, i.e. “facilities to be provided by developer” contained in Table 10.6, under the column of “Total Capital Costs.” In Question 23 Hurricane Preparedness the applicant claims their development program includes a high school “which will be designed to serve a dual purpose as Hurricane Evacuation Shelter.” No such proffer or even a mere mention of donating land or constructing facilities is included in Exhibit 27-1, the applicant’s outreach to MDCPS.
- *Emergency Evacuation Shelter:* Also, it is recommended that the applicant specifically discuss this with the County’s Department of Emergency Management (DEM) as there are

specific considerations, location, and guidelines regarding establishing any school as an emergency evacuation shelter. Any evacuation shelter must be included in the County's Comprehensive Emergency Management Plan (CEMP) and also meet the standards for an Enhanced Hurricane Protection Area (EHPA). In accordance with section 1013.372, F.S., the State Department of Education is to consult with local authorities regarding new criteria to ensure new educational facilities can serve as public shelters, and DEM as the named applicable local emergency management agency would oversee any new school facilities as to the inclusion of the new criteria. Other site design considerations may need consultation with not only DEM, but also with other agencies such as the Department of Transportation and Public Works (DTPW). This is due to the fact that DTPW provides Metrobus pick up and drop off to certain evacuation shelter locations, and in that circumstance any proposed schools may be better situated close to the schools "Transit Station" depicted in Map H. Coordination between the applicant, County agencies and MDCPS is needed, in furtherance of Policy EDU-3H.

Furthermore, it is unclear if the future elevation "above the anticipated category three hurricane flood levels" of the roadways leading to the proposed schools, will be in fact higher than the proposed 9.5-10' NGVD cited for residential units and presumably non-residential uses such as schools (Pages 23-4, 23-1). The elevation of roadways and non-residential, i.e. Schools, must be consistent and needs to be clarified, as to not contribute to flooding to schools from roadways.

Specifically Regarding Agriculture (Question 40)

- "In the latest U.S. Census of Agriculture (2022), nursery and floriculture sales represented more than 83% of the county's agricultural revenue while utilizing just 19% of its farmland. By contrast, traditional row crops and other farm activity consume 83% of agricultural acreage yet account for only 19% of sales." The percentages shown for nursery and row crops acreages are incorrect. The USDA census numbers should come from Table 34 of the 2022 census.
- "Notably, Miami-Dade's position in ornamental plant production—ranking first in the U.S.—and its continued expansion illustrate that nursery/floriculture is stable. However, sustaining nursery and floriculture production requires relatively modest land allocations. Of the county's roughly 13,300 acres devoted to nursery/floriculture, increased greenhouse use, and advanced production techniques can accommodate market demand with little or no additional farmland." The acreage attributed to nursery production is understated. Nursery acreage is well over 20,000 acres, increasing annually and requires more than "modest" land allocations. Greenhouses are a minor component of the nursery industry in Miami-Dade County, as the vast majority of plant production does not require controlled climate production. Greenhouses nor advanced production techniques cannot take the place of the actual physical land area needed to produce plants.

The Department of Emergency Management (DEM) has the following findings indicating that the application is deficient in providing information about the capacity of evacuation centers proposed to be provided by the applicant:

- Storm Surge Planning Zone D: City Park (new development/no existing occupants): 22,296 additional persons, based on County multiplier per the site's Minor Statistical Area. TOTAL Increase in potential additional evacuees = 1,114 people

- Storm Surge Planning Zone D: City Park (new development/no existing occupants): 20,826 additional persons, based on Applicant's stated population projection. TOTAL Increase in potential additional evacuees = 1,042 people
- As per the 2024 ESRI Census, the population in Storm Surge Planning Zone D is 642,282 plus the above *increase in population of 20,836 to 22,296* will increase the total population from 663,108 to 664,669 individuals which is approximately a 3.1% to 3.4% increase in population for Storm Surge Planning Zone D. Therefore, DEM considers the potential for 5% of the 20,836 to 22,296 increases in population to evacuate which equals 1,041 to 1,114 additional evacuees, which poses an impact to the County that would require opening 1-2 additional evacuation centers.
- These calculations are based on the information provided for the new construction project. If projections for the new construction changes, e.g., the population increases or decreases, the assessment becomes invalid.

Miami-Dade County Transportation Planning Organization (TPO) has reviewed the subject application and provides the following comments and finds the Application for Development Approval to be deficient and notes that additional information is required:

- Please provide clarification on transit and multimodal connectivity and improvements related to the CSX Portland Spur, the extension of bus routes and the surrounding bicycle and pedestrian connectivity. Please note that the CSX Portland Spur corridor is not a part of the SMART Program.
- Please provide clarification on the timeline for the transit and multimodal improvements such as the proposed transit hub, transit routes, railway and bike lane improvements.
- Please provide evidence to support a 9.8% work from home reduction. It is important to note that this metric is fluid and can easily change depending on policy and environment.

Miami-Dade County Department of Transportation and Public Works (DTPW) has reviewed the subject application and provides the following comments and finds the Application for Development Approval to be deficient and notes that additional information is required:

Traffic Engineering Division

A. Traffic Study Review Comments

- For the overall traffic study: The assumptions to obtain the traffic volumes/percentages provided in all the tables within the traffic study cannot be verified, as the supporting data and calculations used to derive these values are not provided. Please include the source data, count dates, and any adjustment factors or methodologies applied to allow DTPW to backtrack and confirm the traffic volumes/percentages provided in the analysis.
- Section A (5) (Existing Traffic Conditions): The study states "Additional segment volume data was obtained from a cloud-based traffic analytics application". Please provide details on the cloud-based traffic analytics application used to obtain segment volume data.
- Section B (Trip Generation):

- i. The trip generation assumes a 9.8% reduction due to employees working from home; however, this adjustment does not fall under best practices, as telecommuting conditions are subject to change in the future and variable with fluctuations in work patterns before, during and after COVID-19.
 - ii. Please clarify how the 5% deduction was obtained as it does not coincide with the census 3.7% reduction.
 - iii. Please provide clarification on the Land Use Equivalency Matrix.
 - iv. Table 21.B1 shows that a 3.2% internal capture rate was used between schools-residential; however, item 4 states that internal capture between schools & residential is 39.5%. Please clarify.
 - v. Please note that the proposed 39.5% internal capture rate will be contingent upon site plan review. As per the trip generation handbook section 6.5.1, Development Size: the data that forms the bases for the internal capture methodology are from mixed-use development sites that have between 100,000 and 2 million sq. ft. of building space and an overall acreage of up to roughly 300 acres. The mixed-use development should fall within those ranges. It can be a single site, a block, or a district or neighborhood (with multiple interconnected or interactive blocks within a defined boundary); however, this procedure should not be used for a development composed of different adjacent, but not directly connected, land uses. Adjacent blocks can be directly connected if there is an internal street, driveway, alley system, or pedestrian way by which person trips can be made to travel from one block to another. If the development site has multiple land uses and the blocks are configured in such a way that internal trips must exit the site and use an external street system, then the site is not a mixed-use development.
 - vi. Services that are envisioned for the transit hub are not provided.
 - vii. Provide back up documentation that justifies 5.0 transit and pedestrian trip shares. Current best practices for this area of the County are 1-3 %
- Appendix 21-2: Please provide the D-factor for the MDC traffic counts.
 - Section D (Background Traffic Growth Rate): Please clarify the rationale for applying a lower growth rate (0.7%) to roadway segments closer to the subject site compared to the higher rate (1.4%) applied to segments farther away. Additionally, please clarify which agency approved the use of these percentages.

- Appendix 21-5 (SERPM Documentation): The SERPM model output provided lacks sufficient details. If possible, please include more details to better explain how the growth rate percentages were derived.
- Section D (Background Traffic Growth Rate): The traffic study states that “committed developments are considered to be all approved developments anticipated to generate more than 400 peak hour trips.” Please clarify this statement, as per the MDC Traffic Engineering Division standard methodology, any development generating more than 100 peak hour trips must be considered a committed development.
- The report states “Pursuant to Chapter 163.3180, F.S., roadway segments that operate below the adopted level of service standard are deemed to be “transportation deficient.” In accordance with Chapter 163.3180, F.S., the improvement necessary to correct the transportation deficiency is the funding responsibility of the entity that has maintenance responsibility for that facility. The project is not responsible to help improve or eliminate existing deficiencies”. Please note that we respectfully disagree on interpretation. If any road determined to be transportation deficient without the project traffic under review, the costs of correcting that deficiency shall be removed from the project’s proportionate-share calculations and the necessary transportation improvements to correct that deficiency shall be in place for purposes of the proportionate-share calculation. Although, the improvements necessary to correct the transportation deficiency is the funding responsibility of the entity that has maintenance responsibility for the facility, the development’s proportionate share shall be calculated to mitigate the impacts to at least background conditions.
- Section E (1) (Project Distribution): Please provide a clearer representation of the trip distribution shown on Map J-E1. Also, please verify the accuracy of the percentages, as some of the values appear to be incorrect.
- Section G (Table 21.G.1 – Roadway Sections Providing Site Access): Please note that the applicant will be responsible for constructing the roadway improvements listed in the table below, in addition to those identified in Table 21.G.1.

Roadway	Limits	Required Right of Way (Typical Section must be accepted by the Highway Division)
SW 167 Avenue	SW 136 Street and SW 152 Street	Minimum of 80’ of ROW
SW 172 Avenue	SW 136 Street and SW 152 Street	Minimum of 70’ of ROW

SW 144 Street	SW 177 Avenue and SW 162 Avenue	Minimum of 70' of ROW
---------------	---------------------------------	-----------------------

- Preliminary review of the proposed land uses reveals that a Traffic Impact Study Level III is required for the subject development of the study. Follow TED's traffic impact study standard methodology for the development of the traffic study. Please contact Dalila.Fernandez@miamidade.gov and Anamersy.Arce@miamidade.com to schedule a methodology meeting. Additionally, as the development is proposing schools, a Traffic Operations Plan (TOP) is required for each project phase, using TOP Form Version 12. A supporting site plan exhibit must be included showing key TOP elements such as vehicular circulation, pedestrian routes, access points, school personnel placement, on-site temporary traffic control devices, etc.
- If you have any questions concerning the comments, or wish to discuss this matter further, please contact Anamersy Arce at Anamersy.Arce@miamidade.gov.

Transportation Planning and Policy Division

A. Q21 - Transportation Comments

- Section B - Trip Generation: NOT Sufficient- Needs more information. Trip generation rates and assumptions (ITE 11th Edition) are not clearly shown. Internal capture and multimodal reductions are not quantified and justified with Census data and site context. Missing Information:
 - a. Include explicit modal split percentages and persons-per-vehicle assumption, as the question requires them and they are not clearly presented.
- Section F - Highway Network Modifications: NOT Sufficient- Needs more information. Table 21.F.1 identifies roadway segments with deficiencies and describes responsibility per statute. However, the response is not clear on which improvements are DRI-triggered (Can assume it is the last set of improvements listed, but it is not clear) or the timing of such improvements, as required by the question.

Missing Information:

 - a. Clarify which improvements will be implemented by the developer.
 - b. State when DRI-related improvements are required
 - c. Describe any TSM or mitigation strategies beyond LOS analysis.
- Section G Access Points: NOT Sufficient- Needs more information.
- Map J-G1 and Table 21.G.1 are NOT sufficient. The applicant must identify roadway sections and ROW dedication commitments.

Missing Information:

- a. The question asks how the access plan will minimize impacts and preserve traffic flow. The response lists design standards but lacks a narrative explanation of how access management will achieve this need to add an explanation of impact mitigation measures (e.g., median control, shared access, turn lane design, signal coordination).
 - b. The applicant must review with the County Traffic Engineer County Section line roads and County half section line roads
- Section H Corridor Protection: NOT Sufficient Incomplete. The text explicitly states: “The response to Section H will be provided once the segment analysis is found sufficient.” Missing Information:
 - a. Need to develop the response for Section H:
 - b. Identify any designated transportation corridors in MDC’s Comprehensive Plan.
 - c. Explain how the project supports protection or enhancement of those corridors.
 - d. Specify right-of-way dedications, setbacks, or interlocal agreements proposed.
- Section I Multimodal Provisions / Non-Auto Travel: – NOT Sufficient. Sections 1–4 describe regional transit connectivity, pedestrian/cyclist infrastructure, and TDM strategies (ridesharing, vanpools, transit incentives, etc.).
 - a. Access to regional transit is not sufficient – The Kendall corridor of the SMART Plan is more than 3 miles south of the city park DRI site. While it will provide regional transit service at a future date, the project is currently under development by FDOT and does not have an estimated implementation date. There are currently no plans to create transit service along the Portland rail spur. This connection will still require vehicular trips to move access regional transit
 - b. Access to local transit. Not sufficient – while metrobus route 152 provides service in the general vicinity, it does not provide the required 20-minute headways. While the County is capable of extending this route to the new community, the fiscal impact for new buses needed and operations and maintenance must be addressed by the development prior to the County deeming the application sufficient
 - c. The applicants’ agreement to promote TDM is not sufficient in addressing how this will be implemented. It is unclear what the benefits of promoting staggered work schedules, flex time, WFH, rideshare incentives will be. Nor is an actual program established by the county to keep track and monitor such programs.
 - d. Public Transit Service Improvements stated here are not feasible as there is no proposed Premium Transit rail station.
 - e. Public Transit Infrastructure Improvements. The information needed for the construction of on-site transit shelters, amenities, stops, drop-off locations or pull-out

bays and patron parking to serve the transit stops and stations has not been provided to DTPW

- f. Public Transit Incentives: It is unclear how this measure will provide benefit to the occupants of the project as they may not be employed within the city park DRI area.
- g. Informational Kiosks: These kiosks should be located near the transit terminal and areas of high density residential and commercial units.

If you have any questions concerning the comments, or wish to discuss this matter further, please contact Francisco Arbelaez at (786)469-5310 or Francisco.Arbelaez@miamidade.gov.

JB/GR/ad

Attachments

RE: City Park DRI Application for Development Approval (ADA)

From Schemper-Emily <Schemper-Emily@MonroeCounty-FL.Gov>

Date Thu 11/20/2025 4:10 PM

To Christina Miskis <CMiskis@sfrpc.com>

Cc Isabel Cosio Carballo <isabelc@sfrpc.com>; Kathe Lerch <klerch@sfrpc.com>; Tolpin-Devin <Tolpin-Devin@MonroeCounty-FL.Gov>; Powell-Barbara <Powell-Barbara@MonroeCounty-FL.Gov>; Hurley-Christine <Hurley-Christine@MonroeCounty-FL.Gov>; Schwisow-Cory <Schwisow-Cory@MonroeCounty-FL.Gov>; 'Bob Cambric' <bob.cambric@gmail.com>; Randy Deshazo <rdeshazo@sfrpc.com>; Morris-Peter <Morris-Peter@MonroeCounty-FL.Gov>; Shillinger-Bob <Shillinger-Bob@MonroeCounty-FL.Gov>

 1 attachment (349 KB)

Resolution 510-2025.pdf;

1. Answers the ADA Questions (and components) listed in the Agreement to Delete.

No response from Monroe County

2. Uses the methodologies, data sources, and assumptions (with backup) specified for the Questions (and any components) in the Agreement.

The Applicant's response to **Q10. Part II. – Consistency with Comprehensive Plans – B. Regional Plan** states the following:

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.

However, in accordance with Florida Administrative Code Rules 29J-2.003 and 29J-2.004, it is Monroe County's objection, opinion, and comment that the Application fails to sufficiently align with and/or fails to adequately meet the following materially relevant South Florida Strategic Regional Policy Plan ("SRPP") Policies adopted pursuant to Florida Statutes Section 186.507:

SRPP Policy 8.7: Ensure that the transportation network, including public transportation, supports the emergency evacuation needs of the Region.

SRPP Policy 18.1: Analyze the impacts of proposed development on evacuation times, the availability of off-site shelter capacity, and the potential loss of life and property from

hurricanes.

SRPP Policy 18.20: Ensure the availability of emergency shelter for residents required to evacuate areas adversely affected by natural or technological disasters.

The Applicant's response to **Q23. Hurricane Preparedness does not use the methodologies, data sources, and assumptions (with backup) specified for the Questions (and any components) in the Agreement:**

From the Agreement:

III. Question 23 (Hurricane Preparedness)

The Applicant shall answer Question 20 [sic 23] in the ADA form, and to the extent necessary, use the SFRPC's regional evacuation studies, which are available as linked:

<https://portal.floridadisaster.org/preparedness/RES/Studies/SitePages/RES.aspx#SFRPC> The Applicant will provide the SFRPC the appropriate data, since the applicable evacuation models must be conducted by SFRPC representatives. If the TIME model cannot be run due to obsolescence [sic] or another reason, then the SFRPC may use an alternative model which is mutually acceptable to the SFRPC and the Applicant; and

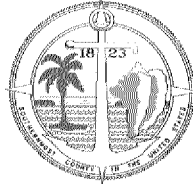
In response to Question 23 (Hurricane Preparedness), the Applicant did not conduct the Transportation Interface for Modeling Evacuations (TIME) model or any other regional evacuation studies, but instead proposes to provide 1,100 shelter spaces within the City Park DRI, which would accommodate approximately five percent (5%) of the development's total estimate of over 21,000 new residents. The Applicant included the following statement in response to the above requirement for Question 23: *The SFRPC has indicated the TIME model is not available for use and has not proposed an alternative. Therefore, the Applicant has responded to Question 23 – Hurricane Preparedness using available information.*

It is the County's opinion that the City Park DRI Application for Development Approval does not meet Sufficiency requirements based on the exclusion of evacuation modeling in the response to Q23, which was required by the Agreement to Delete Questions, executed by the SFRPC and the Applicant in May, 2025; and that the Applicant should be required to:

- 1. Conduct regional evacuation modeling using the same consultant contracted by the State of Florida Division of Emergency Management/Florida Department of Transportation to run the TIME model to show what the regional impacts of the DRI will be, specifically impacts on evacuation of the Florida Keys; and**
- 2. In the absence of modeling, Monroe County requests that the DRI be required to provide sheltering for 100% of the residents of this development.**

- 3. Uses professionally accepted methodologies if a specific methodology is not referenced in the Agreement.**

No response from Monroe County



MONROE COUNTY, FLORIDA
MONROE COUNTY BOARD OF COUNTY COMMISSIONERS
RESOLUTION NO. 510 - 2025

A RESOLUTION OF THE MONROE COUNTY BOARD OF COUNTY COMMISSIONERS FINDING THE CITY PARK DRI APPLICATION FOR DEVELOPMENT APPROVAL DOES NOT MEET SUFFICIENCY REQUIREMENTS BASED ON THE EXCLUSION OF EVACUATION MODELING AND/OR SHELTERING.

WHEREAS, the Board of County Commissioners of Monroe County, Florida (hereinafter “BOCC”, “Board”, or “Monroe County”) is the governing body of Monroe County, Florida; and

WHEREAS, pursuant to Article VIII of the Florida Constitution and Chapter 125, Florida Statutes, Monroe County possesses the police power(s) to enact resolutions and ordinances to protect the health, safety, and welfare of the public at-large; and

WHEREAS, the State of Florida has statutorily and by administrative rule designated the unincorporated Florida Keys of Monroe County an Area of Critical State Concern (“ACSC”); and

WHEREAS, the State of Florida has mandated pursuant to Section 380.0552(2)(j), Florida Statutes, that the Florida Keys ACSC shall “[e]nsure that the population of the Florida Keys can be safely evacuated.”; and

WHEREAS, Rule 28-24.010(1)(f), Florida Administrative Code, provides that “[t]he following developments shall be presumed to be developments of regional impact and subject to the requirements of Chapter 380, F.S.: Any proposed residential development that is planned to create or accommodate more than the following number of dwelling units: In counties with a population in excess of 500,000 – 3,000 dwelling units.”; and

WHEREAS, Parkland West, LLC, the Krome Groves Land Trust, Edward W. Easton, Trustee, and Guherqui International, S.A. (“Applicant”) has filed with the South Florida Regional Planning Council (SFRPC) and Miami-Dade County an Application for Development Approval for the “City Park” Development of Regional Impact (“City Park DRI”); and

WHEREAS, the City Park DRI is a proposed master planned development encompassing approximately 954 acres of agricultural land within unincorporated Miami-Dade County, on Krome Avenue near Miami Executive Airport, approximately 14.5 miles north of where U.S. 1 and Card Sound Road converge in Florida City (being the only route of available egress from Monroe County / the Florida Keys); and

47 **WHEREAS**, the proposed development program for the City Park DRI includes 7,800
48 new residential units with over 21,000 residents, and over 2 million square feet of office, retail,
49 and industrial space; and
50

51 **WHEREAS**, the proposed City Park DRI is outside of Miami-Dade County's adopted 2030
52 Urban Development Boundary, which serves as Miami-Dade County's urban service area
53 boundary, and is not located within any of Miami-Dade County's existing adopted Urban
54 Expansion Areas; and
55

56 **WHEREAS**, the Applicant is also requesting a re-zoning of the City Park DRI site from
57 an agricultural zoning district, and amendments to Miami-Dade County's Comprehensive
58 Development Master Plan; and
59

60 **WHEREAS**, Monroe County, designated an Area of Critical State Concern by the State
61 of Florida, faces unique challenges for hurricane evacuation due to its linear island geography and
62 vulnerability to storm surge; and
63

64 **WHEREAS**, once Monroe County evacuees reach mainland Florida in Florida City, the
65 two designated evacuation routes are the Florida Turnpike, and Krome Avenue; and
66

67 **WHEREAS**, the proposed City Park DRI is anticipated to include over 21,000 new
68 residents adjacent to Krome Avenue and will undoubtedly result in additional evacuation vehicles
69 that will impact clearance times for Miami Dade County and for the Florida Keys; and
70

71 **WHEREAS**, the SFRPC and the Applicant executed an Agreement to Delete Questions in
72 May, 2025, which requires the following for Question 23 (Hurricane Preparedness) of the
73 Application for Development Approval:
74

75 ***III. Question 23 (Hurricane Preparedness)***

76 *The Applicant shall answer Question 20 [sic 23] in the ADA form, and to the extent*
77 *necessary, use the SFRPC's regional evacuation studies, which are available as linked:*
78 *<https://portal.floridadisaster.org/preparedness/RES/Studies/SitePages/RES.aspx#SFRPC>*
79 *The Applicant will provide the SFRPC the appropriate data, since the applicable*
80 *evacuation models must be conducted by SFRPC representatives. If the TIME model*
81 *cannot be run due to obsolescence [sic] or another reason, then the SFRPC may use an*
82 *alternative model which is mutually acceptable to the SFRPC and the Applicant; and*
83

84 **WHEREAS**, in response to Question 23 (Hurricane Preparedness), the Applicant did not
85 conduct the Transportation Interface for Modeling Evacuations (TIME) model or any other
86 regional evacuation studies, but instead proposes to provide 1,100 shelter spaces within the City
87 Park DRI, which would accommodate approximately five percent (5%) of the development's total
88 estimate of over 21,000 new residents; and
89

90 **WHEREAS**, the Applicant included the following statement in response to the above
91 requirement for Question 23:
92

93 *The SFRPC has indicated the TIME model is not available for use and has not proposed*
94 *an alternative. Therefore, the Applicant has responded to Question 23 – Hurricane*
95 *Preparedness using available information; and*
96

97 **WHEREAS**, Part 2.(B.) [beginning at Pages 10-11] of the City Park DRI Application for
98 Development Approval, states as follows:
99

100 **B. Describe how the proposed development will meet goals and policies contained in**
101 **the appropriate Regional Comprehensive Policy Plan.**
102

103 *The proposed City Park Development of Regional Impact (DRI) is fully consistent with the*
104 *Goals, Strategies, and Policies of the Strategic Regional Policy Plan (SRPP) for South*
105 *Florida, as adopted by the South Florida Regional Planning Council (SFRPC). The SRPP*
106 *provides a regional framework to guide land development, infrastructure investment,*
107 *environmental protection, and economic growth in Miami-Dade, Broward, and Monroe*
108 *Counties. City Park directly supports the Plan’s overarching goals of sustainable,*
109 *compact, and coordinated regional development.*
110

111 **WHEREAS**, it is Monroe County’s opinion and/or comment that the Application does not
112 sufficiently align with the South Florida Strategic Regional Policy Plan (“SRPP”) adopted
113 pursuant to Florida Statutes Section 186.507 and in accordance with Rules 29J-2.003 and 29J-
114 2.004, Florida Administrative Code, particularly:
115

116 **SRPP Policy 8.7:** Ensure that the transportation network, including public transportation,
117 supports the emergency evacuation needs of the Region.
118

119 **SRPP Policy 18.1:** Analyze the impacts of proposed development on evacuation times, the
120 availability of off-site shelter capacity, and the potential loss of life and property from
121 hurricanes.
122

123 **SRPP Policy 18.20:** Ensure the availability of emergency shelter for residents required to
124 evacuate areas adversely affected by natural or technological disasters.
125

126 **NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY**
127 **COMMISSIONERS OF MONROE COUNTY, FLORIDA, THAT:**
128

129 **Section 1.** **Recitals and Legislative Intent.** The foregoing recitals, findings of fact,
130 conclusions of law, and statements of legislative intent are true and correct
131 and are hereby incorporated as if fully stated herein.
132

133 **Section 2.** It is the County’s opinion that the City Park DRI Application for Development
134 Approval does not meet Sufficiency requirements based on the exclusion of
135 evacuation modeling in the response to Q23, which was required by the
136 Agreement to Delete Questions, executed by the SFRPC and the Applicant in
137 May, 2025; and that the Applicant should be required to:
138

- 139 1. Conduct regional evacuation modeling using the same consultant contracted
140 by the State of Florida Division of Emergency Management/Florida
141 Department of Transportation to run the TIME model to show what the
142 regional impacts of the DRI will be, specifically impacts on evacuation of
143 the Florida Keys; and
144
145 2. In the absence of modeling, Monroe County requests that the DRI be required
146 to provide sheltering for 100% of the residents of this development.
147

148 **Section 3.** The BOCC hereby approves this Resolution and directs the Clerk of the
149 Court for the Board to transmit a certified copy of this Resolution, as soon
150 as reasonably possible, to the Executive Director of the South Florida
151 Regional Planning Council as follows:
152

153 Executive Director, South Florida Regional Planning Council
154 C/O Isabel Cosio Carballo
155 1 Oakwood Boulevard, Hollywood, FL 33020
156

157 and also to the Miami-Dade County Mayor and Clerk, as follows:
158

159 Office of the Mayor of Miami-Dade County
160 C/O Daniella Levine Cava
161 Stephen P. Clark Center
162 111 N.W. 1st Street, 29th Floor
163 Miami, Florida 33128
164

165 and
166

167 Clerk of the Court and Comptroller of Miami-Dade County
168 C/O Juan Fernandez-Barquin
169 73 W. Flagler Street
170 Miami, Florida 33130
171

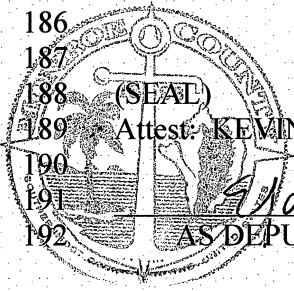
172 **Section 4.** This Resolution shall take effect immediately upon adoption.
173

174 **PASSED AND ADOPTED** by the Board of County Commissioners of Monroe County,
175 Florida, at a regular meeting held on the 12th day of November, 2025.
176

177 Mayor Michelle Lincoln	<u>Yes</u>
178 Mayor <i>Pro Tem</i> David Rice	<u>Absent</u>
179 Commissioner Craig Cates	<u>Yes</u>
180 Commissioner James K. Scholl	<u>Yes</u>
181 Commissioner Holly Merrill Raschein	<u>Yes</u>

182
183 BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY,
184 FLORIDA

185
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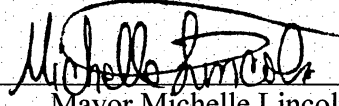


(SEAL)

Attest: KEVIN MADOK, CLERK


AS DEPUTY CLERK

By:



Mayor Michelle Lincoln

MONROE COUNTY ATTORNEY
APPROVED AS TO FORM



PETER MORRIS
ASSISTANT COUNTY ATTORNEY

Date: 11/12/25

FILED FOR RECORD

2025 NOV 19 PM 12:27

CLK CLK SJ
MONROE COUNTY FLA

City Park DRI Review Comments

From Germain, Peter <pgermain@sfwmd.gov>

Date Wed 11/5/2025 3:15 PM

To Christina Miskis <CMiskis@sfrpc.com>

Cc SFRPC Admin <sfadmin@sfrpc.com>

You don't often get email from pgermain@sfwmd.gov. [Learn why this is important](#)

Dear Christina,

The South Florida Water Management District (District) has completed its review for sufficiency of the Application for Development Agreement (ADA) for City Park Development of Regional Impact (DRI) project submitted by the South Florida Planning Regional Planning Council (SFPRC).

The District has determined the application appears to be sufficient.

For assistance or additional information, please contact me.

Best,



Peter Germain

Policy and Planning Analyst – Specialist

Water Supply Implementation Unit

South Florida Water Management District

3301 Gun Club Road, West Palm Beach, FL 33406

Office: 561-682-6779 | pgermain@sfwmd.gov



From: [Samson, Kim C.](#)
To: [Christina Miskis](#)
Cc: [Kathe Lerch](#)
Subject: RE: City Park DRI - sufficiency review
Date: Thursday, November 6, 2025 2:35:58 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Hi Christina,

The DRI does not show any Turnpike facilities as being significant.

The Turnpike will defer to the District for comments on the DRI.

Regards,
Kim

From: Christina Miskis <CMiskis@sfrpc.com>
Sent: Thursday, November 6, 2025 11:06 AM
To: Samson, Kim C. <Kim.Samson@dot.state.fl.us>
Cc: Kathe Lerch <klerch@sfrpc.com>
Subject: City Park DRI - sufficiency review

EXTERNAL SENDER: Use caution with links and attachments.

Hi Kim -

Hope all is well!

I'm checking in on the sufficiency review on City Park DRI. Do you know if the Turnpike will be providing comments?

Best,
Christina

Christina Miskis, AICP
Principal Planner
South Florida Regional Planning Council
1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020
954.924.3653 (o) | cmiskis@sfrpc.com



Confidentiality Notice: Please note that Florida has broad public records laws and all correspondence sent via email may be subject to disclosure.

From: [RODRIGUEZ, IVAN M](#)
To: [Graham Penn](#)
Cc: [Concurrency Management](#); [Simon, Nathaly](#); [Garcia, Jeannette C.](#); [HERRERA, ANA I](#); [Stillings, Noel \(RER\)](#); [Bob Cambric](#); ["Rob@curtisplanning.com"](#); [SFRPC Admin](#); [Isabel Cosio Carballo](#)
Subject: Preliminary School Concurrency Analysis for Parkland West LLC, ET AL (Z2025000222) (PH3025102700636)
Date: Wednesday, November 5, 2025 8:20:39 PM
Attachments: [image001.png](#)
[Parkland West LLC, ET AL Z2025000222 CITY PARK DRI - PH3025102700636.pdf](#)

Dear Applicant,

On Monday, October 27, 2025 Miami-Dade County submitted Application No. PH3025102700636 to Miami-Dade County Public Schools to provide a School Planning Level Review. Pursuant to State Statutes and the Interlocal Agreement for Public School Facility Planning in Miami-Dade County, the above-referenced application was reviewed for compliance with Public School Concurrency. Accordingly, enclosed please find the School District's Preliminary Concurrency Analysis (School Planning Level Review).

As noted in the School Planning Level Review, the proposed development would yield a maximum residential density of 7,800 units (1,029 Single-Family Detached units and 6,771 Multifamily units), which generate 1,482 students (1,029 at the elementary, 337 at the middle, and 435 at the senior high school level). At this time, all school levels have sufficient capacity available to serve the application. However, a final determination of Public School Concurrency and capacity reservation will only be made at the time of approval of final plat, site plan or functional equivalent, notwithstanding any additional information that may surface after further departmental research. As such, this analysis does not constitute a Public School Concurrency Approval.

Should you have any questions, please feel free to contact our office at 305-995-7285.

Best regards,



Ivan M. Rodriguez

Director

Growth Management

Office of Governmental Affairs & Land Use

Facilities Design and Construction

Miami-Dade County Public Schools

1450 N.E. Second Avenue

Miami, Florida 33132

(305) 995-4501



Miami-Dade County Public Schools

giving our students the world

Superintendent of Schools

Dr. Jose L. Dotres

November 5, 2025

VIA ELECTRONIC MAIL

Mr. Graham Penn, Esquire
Bercow Radell Fernandez Larkin + Tapanes
200 S. Biscayne Boulevard, Suite 300,
Miami, FL 33131
GPenn@brzoninglaw.com

Miami-Dade County School Board

Mari Tere Rojas, Chair
Monica Colucci, Vice Chair
Roberto J. Alonso
Dr. Dorothy Bendross-Mindingall
Mary Blanco
Danny Espino
Dr. Steve Gallon III
Joseph S. Geller
Luisa Santos

RE: PRELIMINARY SCHOOL CONCURRENCY ANALYSIS FOR CITY PARK DRI

PARKLAND WEST LLC, ET AL (Z2025000222) (PH3025102700636)

**FOLIO NOS.: 3059200000040, 3059200000050, 3059190000012, 3059190000010, 3059200000030,
3059200000210, 3059190000020, 3059200000031, 3059200000080, 3059200000070,
3059190000011**

Dear Applicant,

On Monday, October 27, 2025 Miami-Dade County submitted Application No. PH3025102700636 to Miami-Dade County Public Schools to provide a School Planning Level Review. Pursuant to State Statutes and the Interlocal Agreement for Public School Facility Planning in Miami-Dade County, the above-referenced application was reviewed for compliance with Public School Concurrency. Accordingly, enclosed please find the School District's Preliminary Concurrency Analysis (School Planning Level Review).

As noted in the School Planning Level Review, the proposed development would yield a maximum residential density of 7800 units, which generate 1,482 students (1,029 at the elementary, 337 at the middle, and 435 at the senior high school level). At this time, all school levels have sufficient capacity available to serve the application. However, a final determination of Public School Concurrency and capacity reservation will only be made at the time of approval of final plat, site plan or functional equivalent, notwithstanding any additional information that may surface after further departmental research. As such, this analysis does not constitute a Public School Concurrency Approval.

Should you have any questions, please feel free to contact our office at 305-995-7285.

Best regards,



Ivan M. Rodriguez, Director

IMR:ir
L-079
Enclosure

cc: Ms. Nathaly Simon
Ms. Jeannette Garcia
Ms. Noel Stillings
Mr. Rob Curtis
Mr. Bob Cambric
SFRPC Admin (sfadmin@sfrpc.com)
Miami-Dade County
School Concurrency Master File

Governmental Affairs & Land Use

*School Board Administration Building • 1450 N.E. 2nd Avenue • Miami, Florida 33132
305-995-1000 • www.dadeschools.net*



Concurrency Management System (CMS)

Miami-Dade County Public Schools

Miami-Dade County Public Schools

Concurrency Management System

Preliminary Concurrency Analysis

MDCPS Application Number:
Date Application Received:
Type of Application:

PH3025102700636
10/27/2025 3:24:07 PM
Public Hearing

Local Government (LG):
LG Application Number:
Sub Type:

Miami-Dade
z2025000222
Redevelopment

Applicant's Name:

Parkland West LLC, ET AL

Address/Location:

SW 136 Street to the north, SW 162 Avenue to the east, SW 152 Street to the south, and SW 177 Avenue to the west.

Master Folio Number:

3059200000040

Additional Folio Number(s):

3059200000050, 3059190000012, 3059190000010, 3059200000030,
3059200000210, 3059190000020, 3059200000031, 3059200000080,
3059200000070, 3059190000011.

PROPOSED # OF UNITS

7800

SINGLE-FAMILY DETACHED UNITS:

1029

SINGLE-FAMILY ATTACHED UNITS:

0

MULTIFAMILY UNITS:

6771

CONCURRENCY SERVICE AREA SCHOOLS

CSA Id	Facility Name	Net Available Capacity	Seats Required	Seats Taken	LOS Met	Source Type
125	NORMA BUTLER BOSSARD ELEMENTARY	27	710	27	NO	Current CSA
125	NORMA BUTLER BOSSARD ELEMENTARY	117	683	117	NO	Current CSA Five Year Plan
6771	JORGE MAS CANOSA MIDDLE	691	337	337	YES	Current CSA
7731	MIAMI SOUTHRIDGE SENIOR	-105	435	0	NO	Current CSA
7731	MIAMI SOUTHRIDGE SENIOR	0	435	0	NO	Current CSA Five Year Plan

ADJACENT SERVICE AREA SCHOOLS

3261	MIAMI HEIGHTS ELEMENTARY	249	566	249	NO	Adjacent CSA
2151	JACK DAVID GORDON ELEMENTARY	247	317	247	NO	Adjacent CSA
4511	DR GILBERT L PORTER ELEMENTARY	192	70	70	YES	Adjacent CSA
7531	MIAMI SUNSET SENIOR	721	435	435	YES	Adjacent CSA

*An Impact reduction of **33.68%** included for charter and magnet schools (Schools of Choice).

MDCPS has conducted a preliminary public school concurrency review of this application; please see results above. A final determination of public school concurrency and capacity reservation will be made at the time of approval of plat, site plan or functional equivalent. **THIS ANALYSIS DOES NOT CONSTITUTE PUBLIC SCHOOL CONCURRENCY APPROVAL.**

1450 NE 2 Avenue, Room 525, Miami, Florida 33132 / 305-995-7285 / concurrency@dadeschools.net