10. GENERAL PROJECT DESCRIPTION

PART 1 SPECIFIC PROJECT DESCRIPTION

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

City Park (alternatively the "Project") presents a transformative opportunity to establish a master-planned, resilient community that exemplifies sustainable growth and balanced urban development within Miami-Dade County. Envisioned as a forward-looking model for community-building, the Project integrates a rich mix of land uses that promote walkability, connectivity, accessibility, and long-term climate adaptability. With 954 net acres (991 gross acres) of developable land, City Park is designed to support a full spectrum of residential densities, commercial services, educational institutions, civic infrastructure, and recreational amenities—creating a complete and inclusive "work, learn, live, play" urban environment.

Project Overview

City Park is a proposed master-planned development encompassing approximately 954 net acres (991 gross acres) located in unincorporated southwest Miami-Dade County, bounded by SW 136th Street (Howard Drive) to the north, SW 152nd Street (Coral Reef Drive) to the south, and Krome Avenue (SW 177th Avenue) to the west (the "Subject Property"). The project is strategically positioned to support the County's long-term objectives for growth management, economic development, infrastructure efficiency, and environmental resilience. The proposed development program for City Park is shown in **Table 10.A.1**, below.

TABLE 10.A.1 Proposed Development Program	
Land Use	**Units (2027 – 2036)**
Residential **- Single Family Detached** **- Single Family Attached** **- Multi-Family***	 1,029 homes 4,532 townhomes 2,239 units
Retail	673,902 sf
Office	500,000 sf
Industrial	892,484 sf
Schools	Elementary – 1,011 students Middle – 1,222 students High School – 1,630 students
Community Uses **Open Space, Parks**	249.5 acres

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

Land Use Framework and Mix of Uses

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

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

This integrated framework reflects consistency with Miami-Dade County Comprehensive Development Master Plan ("CDMP") objectives, including policies

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

promoting mixed-use centers, transit-oriented development ("TOD") near future transit, and development that balances housing and employment.

Urban Design Principles and Community Structure

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

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

Development intensities are scaled to context, with **higher-density and vertical mixed-use** concentrated around transit and activity centers, and **lower-density residential** providing a buffer toward the site's perimeter. This organizational structure offers a **deliberate transition in intensity and scale**, reinforcing a legible community form and supporting multimodal connectivity.

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

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

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

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

Open Space, Parks, and Resiliency Infrastructure

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

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

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

Mobility, Access, and Transit Readiness

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

- **A Complete Street Network:** Including boulevards, loop roads, and connectors structured around pedestrian safety and multimodal hierarchy.
- **Transit-Oriented Development Node:** Located near a potential future CSX line extension and programmed to accommodate a regional mobility/transit hub.
- **Bicycle and Pedestrian Infrastructure:** Class I trails, dedicated bike lanes, and esplanades connecting to regional assets such as the Black Creek Trail.

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

Environmental and Climate Resiliency

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

- **Stormwater Infrastructure Integrated with Open Space**: Lakes, greenways, and bioswales are designed as dual-purpose features, managing runoff while creating usable public open space and reinforcing site-wide green infrastructure networks.
- **Native and Climate-Adapted Landscaping**: Plant palettes emphasize native and drought-tolerant species to reduce irrigation demand, support biodiversity, and strengthen habitat connectivity within the built environment.
- **Food Resiliency through Urban Agriculture:** The project includes a designated **Farm District** that provides opportunities for community-supported agriculture, school partnerships, and demonstration gardens. This feature

supports localized food production, enhances community nutrition, and aligns with the County's broader vision of resilient land use.

- **Urban Heat Island Mitigation:** Tree canopy coverage, shaded public spaces, and compact land use patterns reduce ambient temperatures and improve thermal comfort in the face of rising urban heat.

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

Conclusion

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

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

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

TABLE 10-2
EXISTING AND PROPOSED LAND USES

Land Use	Non-Residential		Residential				Total Acreage
	Units	Acres	DU	Acres	Net Density	Gross Density	
Existing Vegetation Associations							
Row Crops – Applicant Owned (214, FLUCCS)		937					
Row Crops – Owned by Others (214, FLUCCS)		17.5					
SW 177 Ave ROW		19.5					
Existing Railroad ROW		17					
Total Acreage		**991***					
Proposed Project (2026 - 2036)							
Total Residential (28-24.023, F.A.C.)	7,800 units**	498	7,800		10.6 du/acre	8.2 du/acre	
Retail (28-24.031, F.A.C.)	673,902 gsf	29					
Office (28-24.020, F.A.C.)	500,000 gsf	15					
Industrial (28-24.018, F.A.C.)	892,484 gsf	40					
Mixed Use	**	85					
Schools & Public Facilities	(1) Elementary (1) Middle (1) High School	20					
Community Uses – Open Space, Parks, Farm, Water		250					
Roadway ROW		37					
Railroad ROW		17					
Total Acreage							991*

* 954 net acres (991 gross acres)

** The Project includes a total of 7,800 residential dwelling units. Of this total, 1,652 dwelling units are proposed within mixed-use development, and the remaining 6,148 dwelling units are proposed within stand-alone residential land use categories.

Source: The Curtis Group

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

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

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

City Park's retail and commercial component plans for a total 673,902 square feet of space that will be spread among numerous locations and facilities including stand-alone shopping center, ground floor retail within mixed-use development and outparcel buildings. While the retail and commercial development will unquestionably serve not just the City Park community, but the broader surrounding south Miami-Dade County community, it is envisioned to represent neighborhood shopping primarily serving the City Park residents, workers and surrounding area visitors as opposed to a more regional/destination offering. The vast majority of City Park retail will be situated within facilities ranging from 30,000 to 125,000 square feet, which is the defined footprint of Neighborhood Centers according to the International Council of Shopping Centers (ICSC)[†] and categorized as convenience-oriented uses including supermarket. Accordingly, ICSC determines Neighborhood Centers to draw demand from within a 3±-mile distance radius. Considering this, the primary trade area for City Park is captured within a 10-minute drive time from the intersection of SW 144th Street and SW 162nd Avenue, while a secondary trade area extends to a 15-minute drivetime radius. A summary overview of each trade area follows, with a map of an overlay map of both areas on the following page.

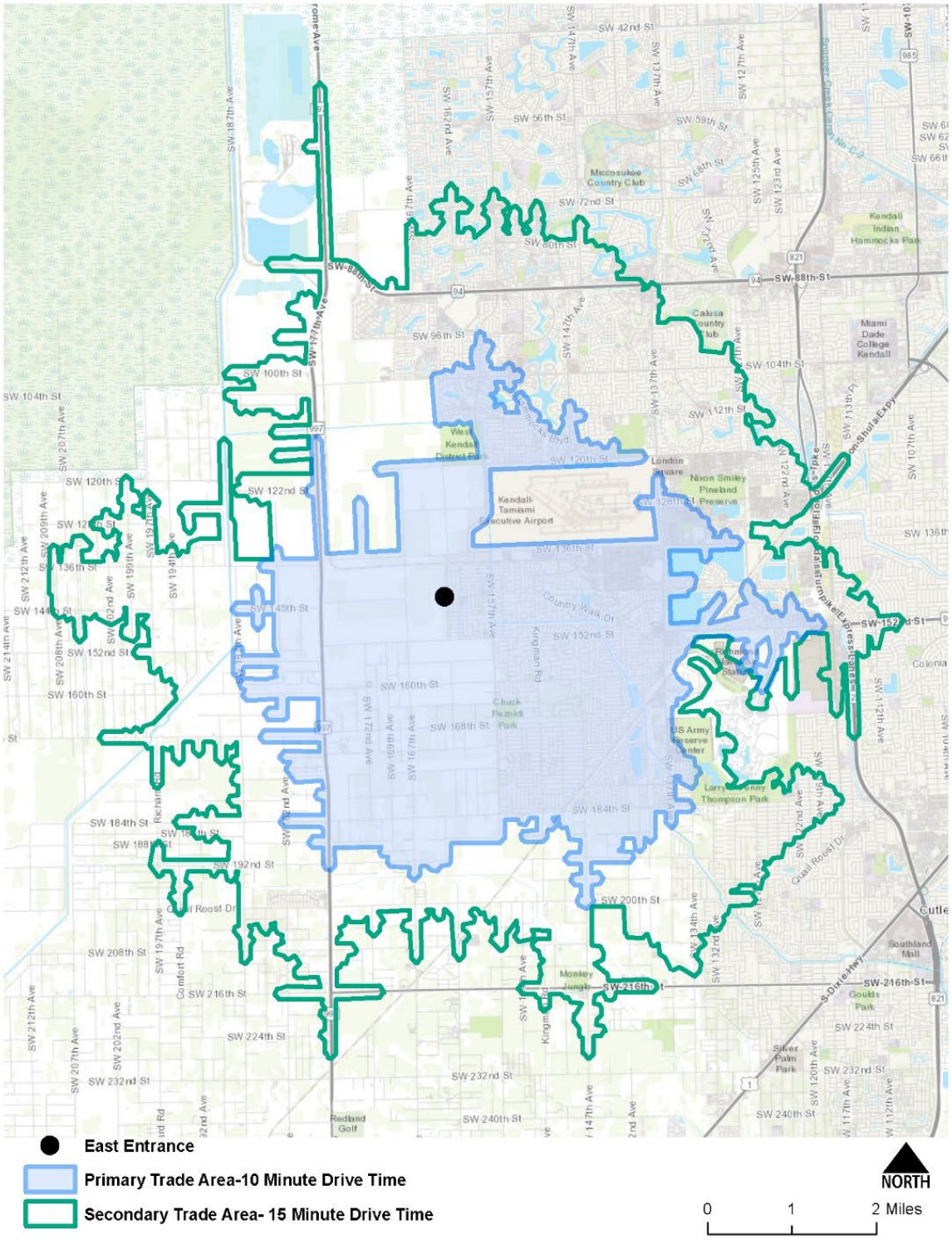
Primary Trade Area: The primary trade area is largely defined within a 2- to 3-mile radius. According to ACS 2023, total population within the primary trade area is 65,783, with 20,042 total households. The median household income within this geography is $97,216, providing for $1.9 billion in aggregate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

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

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

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

Figure 1: Map of City Park Primary Retail Trade Area (10-minute drivetime) and Secondary Retail Trade Area (15-minute drivetime) Source: ESRI



In all, the primary and secondary trade areas contain 57,482 households with an aggregate income of $4.9 billion. Approximately 35 percent of these households reside within the primary trade area which has a retail vacancy of a staggering <2.0 percent. As noted, the vast majority of City Park's proposed retail demand is anticipated to be derived from its own resident, worker and visitor base. Nonetheless, the surrounding trade area provides added support for City Park's new retail, dining, entertainment and services options, and notably, the level of retail planned for City Park will have almost no impact on the stability (occupancy) of the trade area retail sector.

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

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

Residential Demand

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

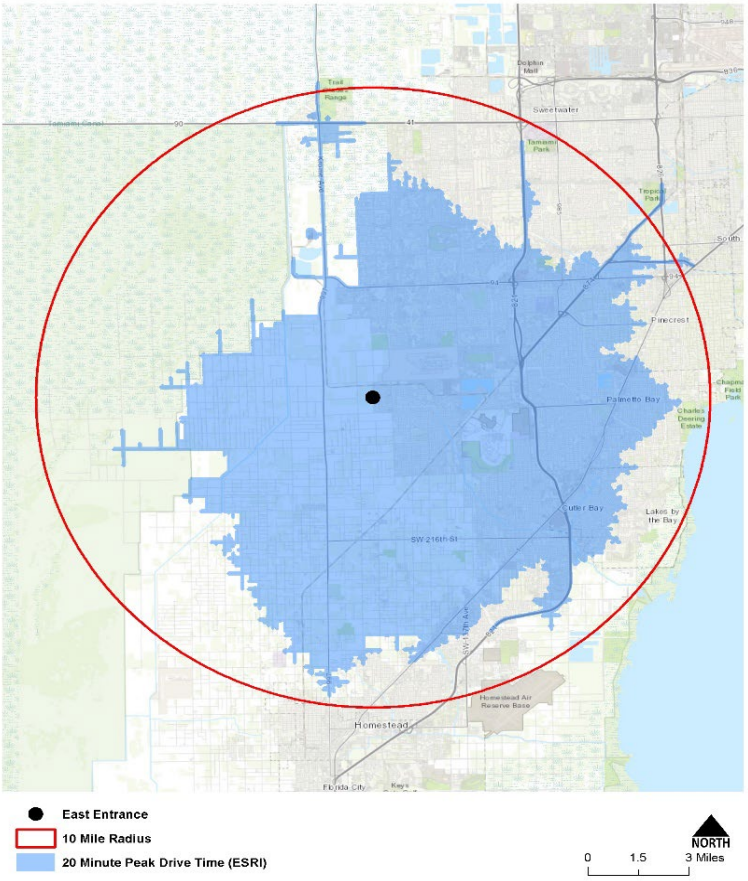
With respect to population projections, the forecasts used in Table 10-E.2 are derived from the Miami-Dade Transportation Planning Organization (TPO), which is a county-affiliated agency responsible for preparing long-range socioeconomic and population forecasts used consistently across County transportation, land-use, and concurrency analyses. The TPO projections are developed in coordination with Miami-Dade County departments and represent the County's adopted planning assumptions for mobility and growth modeling.

At this time, Miami-Dade County has not published a more recent or alternative population forecast at the geographic scale applicable to the City Park RMA. In 2025, MDC RER published population projections for the County's Minor Statistical Areas (MSA); however, it is not applicable to the analysis of housing supply and demand that defines the ECFRPC methodology for affordable housing need in Q24 which is based upon the RMA (noted above). However, the TPO does publish population projections at the Traffic Area Zone (TAZ) level that aligns with census block groups and the RMA.

Additionally, as noted by RER staff, Countywide land capacity analyses indicate that there is effectively no remaining single-family residential land capacity beyond approximately 2029, reinforcing the relevance of planned, master-planned communities such as City Park in accommodating future population growth within the County's long-range planning framework.

Accordingly, the demographic data and population projections presented in Tables 10-E.1 and 10-E.2 are based on the most current, publicly available, and County-recognized data sources, and remain appropriate for evaluating existing conditions and future population assumptions for the proposed development.

Figure1: Map of 20-minute Drive Time (Peak Travel) – City Park RMA
Source: ESRI



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

TABLE 10 - E.1 Demographic Snapshot of RMA	
Total Population ACS 2023	482,183
Total Population ACS 2013	447,078
Households ACS 2023	159,198
Avg. HH Size ACS 2023	3.05
Median Household Income ACS 2023	$81,348
% Above $75K ACS 2023	*53.6%*
% Above $100K ACS 2023	*39.6%*
Owner Occupied Households % ACS 2023	65.7%
Renter Occupied Households % ACS 2023	34.3%
	Source: US Census (ACS 2023)

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

However, one additional factor warrants consideration for the residential demand analysis. The TPO and County growth projections appropriately reflect the availability of entitled land for future development. Today, by the County's own assessment, there will be no entitled land available for additional single family housing in the entire South Central Tier, and no single or multi-family units in the South Central Tier west of the Turnpike after 2029. This area west of the Turnpike is a measurable part of the City Park RMA. The potential approval of City Park however provides for additional land to support 7,800 units which could not (nor should not) have been incorporated into previous long-term projections by the TPO or County. In practice, once additional units are entitled, growth very likely will revert to faster historic rates. The basis for this considers the County's own projections, population in MSA 7.2 (to the south of City Park's MSA 6.2) is forecast to grow at a rate of 1.5 to 1.7 percent annually during each decade between 2020 and 2040; or, a rate nearly two-times the rate of MSA 6.2 even though a very large portion of that area is outside of the UDB. Indeed, because MSA 7.2 being a greater distance from key employment and commercial nodes than MSA 6.2, one would actually expect newly available land in MSA 6.2 (which is a large part of the RMA) to have a more robust impact on growth than available land further south and further away from key employment centers and community services and amenities.

TABLE 10 - E.2

City Park RMA - Population And Household Forecast			
Estimated Households (Year)	**Est. 2026**	**2031**	**2036**
TPO Growth (0.9%/yr.)	162,076	169,502	177,268
Net New HH's (TPO TAZ)		1,512	1,581
Cumulative HH's (TPO TAZ)		7,426	**15,192**
Modified Growth (1.25%/yr.)	162,076	172,462	183,514
Net HH's (Trendline)		2,129	2,266
Cumulative HH's (Trendline)		10,386	**21,438**
		Sources: MDC TPO; Lambert Advisory	

Based upon the household growth rates above, the RMA's potential housing demand ranges between 15,000 and 21,000 units. However, it is clearly recognized that not all of these households will be able to afford the homeownership and rental product in City Park. Therefore, the minimum affordability household income threshold is estimated to be between $80,000 to $90,000 which is between 45 to 50 percent of RMA households as noted in Table 10 – E.1, above. This generates demand for roughly 7,500± to 11,000± housing units during the City Park development phase. Moreover, and generally in line with the RMA's housing tenure, two-thirds of the demand will be for homeownership, with one-third for rental. In any event, it should be noted, notwithstanding consideration for higher RMA growth which exceeds the TPO's projection once more land is entitled for housing development in the South Central Tier, even under a TPO baseline growth scenario, there is adequate demand generated to support City Park's residential buildout within a 10 year period.

Retail Demand

As discussed in **Section 10-D,** demand for City Park's proposed 673,902± square feet of retail will largely be driven from its own resident, worker, and visitor demand. Naturally, the commercial businesses and services within City Park will also attract residents, workers and visitors from outside of the area, including the primary and secondary trade areas defined within **Section 10-D**. Nonetheless, since a large share of City Park retail demand will be generated from within, the demand analysis herein weighs much more heavily on demand generated from City Park residents, workers, and visitors with limited additional inflow demand from the surrounding market area.

As it pertains to residents and, specifically, the 7,800 new single family attached and detached homeownership and multifamily rental households upon development completion, a comprehensive retail model (Lambert Advisory Retail Trade Model) has been utilized to determine demand from the prospective resident base. First, the 7,800 new residences will create a total population of 20,826 (at 2.67 persons per household). The population multiplier used in the analysis considers a number of factors. According to ACS 2023 data, the MSA's average person/household (PPH) is 3.1 which is presumed to be the basis for RER's calculation above. It is important to note, though, that 63% of the MSA's existing dwelling units are single family detached homes. Comparatively, Miami Dade County's ACS 2023 PPH is 2.67 with 38 percent single family detached units. The RMA PPH average is 3.0, with 57 percent single family detached. The City Park plan comprises 13 percent single family detached dwelling units which is

significantly lower than the County, RMA and MSA. There is a correlation between single family detached housing and average PPH. This is not to say that single family attached housing cannot accommodate larger household sizes, but these are generally smaller dwellings than single family. Furthermore, City Park comprises a comparatively higher mix multifamily units as a percent of total units (29 percent) with a predominate mix of one- and two-bedroom units which constrains family size. The analysis herein utilizes the County's PPH for the City Park DRI which is considered to be conservative given the proposed mix of housing.

Second, considering preliminary homeownership and multi-family rental pricing for City Park, total household income in City Park is based upon a minimum average household income threshold of $155,000 (or, $59,200 per capita based upon the County's average household size). Third, non-automobile retail expenditure for residents within City Park is 20.5 percent of total personal income utilizing the Department of Commerce Consumer Expenditure Survey (2023). Lastly, the model utilizes non-auto expenditure by store type based upon the US Census of Retail Trade (2022), sales per square foot by type of goods based upon general market data, and outflow factors that account for retention and leakage among residents.

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

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

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

In addition to resident demand, additional demand will be driven from the significant number of City Park workers. The key factors driving this model include: 7,823 total workers in retail, office, industrial, household and other sectors. It is very difficult to ascertain the number of workers that will actually live in City Park in the effort to avoid "double" counting these workers as residents. As a topline metric, and based upon US Census On-the-Map (Resident and Worker Inflow/Outflow), the number of workers within the RMA (as discussed above) that both live and work within the area is 37 percent. Utilizing this inflow/outflow factor yields 4,942± net new workers generating retail demand within City Park upon stabilized operations; based upon an International Council of Shopping Center (ICSC Worker Expenditure report issued in 2012, the average worker spends a total of $6,900 on retail goods and services per year. On a conservative basis, the analysis herein considers a 10 percent increase factor; and, average sales per retail type is the same as for the resident model. These assumptions yield $37 million in total annual retail expenditure that, against an average retail sales per square foot of nearly $425, yields more than 88,000 square feet of additional retail demand above resident demand.

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

demand upon stabilized operations which exceeds the proposed City Park retail component.

Office Demand

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

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

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

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

Source: Costar

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

With 7,800 new homes, combined with 673,902 square feet of retail and 892,484 square feet of industrial space, City Park effectively becomes comparable to a municipality and generates significant internal demand for professional, technical, and financial activities; as well as creating a desirable professional business environment to attract considerable demand in the surrounding CMA. In turn, this master plan helps to cement the CMA's continued capture of the County's future office demand and, likely, increase its share from historical trends. To that, the 500,000 square feet proposed within City Park represents 24 square feet per capita (as referenced above), which is significantly lower than the average office-to-resident ratio of 36 square feet among 12 municipalities in Miami-Dade County with population sizes ranging from roughly 11,000 to 40,000 persons.[§] City Park's 500,000 square feet of office space delivered in the next 10 years is supported.

Industrial

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

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

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

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

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

Source: Costar

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

Residential Amenity

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

F. Economic Disparity

Job creation has historically been a major challenge for Miami-Dade County as it tries to accommodate the needs of its immigrant population, many of members of which come here for political and familial reasons rather than with knowledge that employment opportunities exist for them. The City Park DRI will be a benefit to the

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

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

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

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

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

G. Project Cost

The City Park development is estimated to cost a total of $2.8 billion (in 2026 $'s) inclusive of labor, materials, soft costs, financing, and contingency. It is estimated that approximately 87 percent of the total development expenditure will be spent within the Miami Dade County region.

TABLE 10 - F.1
City Park DRI - Estimate Project Costs[1]
(in Million's in 2026 $'s)

Item	Project Cost	% Spent in Region	Amount Spent in Region
Land	$0	0%	$0
Labor[1]	$1,086,006	100%	$1,086,006
Materials[1]	$1,086,006	80%	$868,804
Interest	$215,013	50%	$107,507
Planning[2]	$108,568	80%	$86,854
Other[3]	$323,581	95%	$307,402
Total	**$2,819,174**	**87%**	**$2,456,573**

Notes:

1.) Includes Furniture, Fixtures & Equipment

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

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

Table 10-G.1, **Project Costs Table**, is presented above. The City Park DRI program will be developed in a single phase during the years of 2027 through 2036. Project costs are dependent on variables pertaining to the individual projects as they are developed. The most significant of these variables is the timing of development during the City Park development period, the scope and location of individual developments and the capital market factors that affect project financing. Therefore, the dollar amounts provided in **Table 10-G.2** are estimates, only, and could vary significantly from the final costs involved in the implementation of City Park.

Table 10.G.2
Project Cost Table
City Park DRI
(in Millions, 2026 Constant $'s)

Single Family	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	**Total**
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$9,839,390	$19,678,780	$29,518,170	$29,518,170	$29,518,170	$19,678,780	$29,518,170	$19,678,780	$9,839,390	$196,787,802
Materials	$0	$9,839,390	$19,678,780	$29,518,170	$29,518,170	$29,518,170	$19,678,780	$29,518,170	$19,678,780	$9,839,390	$196,787,802
Interest	$0	$1,948,057	$3,896,114	$5,844,172	$5,844,172	$5,844,172	$3,896,114	$5,844,172	$3,896,114	$1,948,057	$38,961,145
Planning	$0	$983,643	$1,967,286	$2,950,930	$2,950,930	$2,950,930	$1,967,286	$2,950,930	$1,967,286	$983,643	$19,672,864
Other	$0	$2,931,700	$5,863,401	$8,795,101	$8,795,101	$8,795,101	$5,863,401	$8,795,101	$5,863,401	$2,931,700	$58,634,008
Total	**$0**	**$25,542,181**	**$51,084,362**	**$76,626,543**	**$76,626,543**	**$76,626,543**	**$51,084,362**	**$76,626,543**	**$51,084,362**	**$25,542,181**	**$510,843,620**

Townhome	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
Labor	0	20,258,603	40,517,205	60,775,808	60,775,808	60,775,808	60,775,808	40,517,205	40,517,205	20,258,603	405,172,052
Materials	0	20,258,603	40,517,205	60,775,808	60,775,808	60,775,808	60,775,808	40,517,205	40,517,205	20,258,603	405,172,052
Interest	0	4,010,911	8,021,822	12,032,733	12,032,733	12,032,733	12,032,733	8,021,822	8,021,822	4,010,911	80,218,219
Planning	0	2,025,251	4,050,502	6,075,753	6,075,753	6,075,753	6,075,753	4,050,502	4,050,502	2,025,251	40,505,023
Other	0	6,036,162	12,072,324	18,108,486	18,108,486	18,108,486	18,108,486	12,072,324	12,072,324	6,036,162	120,723,242
Total	**$0**	**$52,589,529**	**$105,179,059**	**$157,768,588**	**$157,768,588**	**$157,768,588**	**$157,768,588**	**$105,179,059**	**$105,179,059**	**$52,589,529**	**$1,051,790,588**

Multifamily	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	0
Labor	$0	$9,625,974	$19,251,949	$28,877,923	$28,877,923	$28,877,923	$28,877,923	$19,251,949	$19,251,949	$9,625,974	$192,519,488
Materials	$0	$9,625,974	$19,251,949	$28,877,923	$28,877,923	$28,877,923	$28,877,923	$19,251,949	$19,251,949	$9,625,974	$192,519,488
Interest	$0	$1,905,804	$3,811,608	$5,717,412	$5,717,412	$5,717,412	$5,717,412	$3,811,608	$3,811,608	$1,905,804	$38,116,080
Planning	$0	$962,308	$1,924,616	$2,886,924	$2,886,924	$2,886,924	$2,886,924	$1,924,616	$1,924,616	$962,308	$19,246,161
Other	$0	$2,868,112	$5,736,224	$8,604,336	$8,604,336	$8,604,336	$8,604,336	$5,736,224	$5,736,224	$2,868,112	$57,362,241
Total	**$0**	**$24,988,173**	**$49,976,346**	**$74,964,519**	**$74,964,519**	**$74,964,519**	**$74,964,519**	**$49,976,346**	**$49,976,346**	**$24,988,173**	**$499,763,458**

Retail/Commercial	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$3,749,915	$7,499,830	$7,499,830	$11,249,745	$11,249,745	$11,249,745	$11,249,745	$7,499,830	$3,749,915	$74,998,303
Materials	$0	$3,749,915	$7,499,830	$7,499,830	$11,249,745	$11,249,745	$11,249,745	$11,249,745	$7,499,830	$3,749,915	$74,998,303
Interest	$0	$556,822	$1,113,644	$1,113,644	$1,670,465	$1,670,465	$1,670,465	$1,670,465	$1,113,644	$556,822	$11,136,436
Planning	$0	$374,879	$749,758	$749,758	$1,124,636	$1,124,636	$1,124,636	$1,124,636	$749,758	$374,879	$7,497,575
Other	$0	$1,117,308	$2,234,616	$2,234,616	$3,351,924	$3,351,924	$3,351,924	$3,351,924	$2,234,616	$1,117,308	$22,346,157
Total	**$0**	**$9,548,839**	**$19,097,678**	**$19,097,678**	**$28,646,516**	**$28,646,516**	**$28,646,516**	**$28,646,516**	**$19,097,678**	**$9,548,839**	**$190,976,775**

Office	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$3,293,641	$6,587,283	$6,587,283	$6,587,283	$9,880,924	$9,880,924	$9,880,924	$6,587,283	$6,587,283	$65,872,828
Materials	$0	$3,293,641	$6,587,283	$6,587,283	$6,587,283	$9,880,924	$9,880,924	$9,880,924	$6,587,283	$6,587,283	$65,872,828
Interest	$0	$652,093	$1,304,187	$1,304,187	$1,304,187	$1,956,280	$1,956,280	$1,956,280	$1,304,187	$1,304,187	$13,041,869
Planning	$0	$329,265	$658,530	$658,530	$658,530	$987,795	$987,795	$987,795	$658,530	$658,530	$6,585,302
Other	$0	$981,359	$1,962,717	$1,962,717	$1,962,717	$2,944,076	$2,944,076	$2,944,076	$1,962,717	$1,962,717	$19,627,172
Total	**$0**	**$8,550,000**	**$17,100,000**	**$17,100,000**	**$17,100,000**	**$25,650,000**	**$25,650,000**	**$25,650,000**	**$17,100,000**	**$17,100,000**	**$171,000,000**

Industrial Mixed Use	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$3,667,924	$7,335,848	$11,003,772	$11,003,772	$11,003,772	$11,003,772	$7,335,848	$7,335,848	$3,667,924	$73,358,481
Materials	$0	$3,667,924	$7,335,848	$11,003,772	$11,003,772	$11,003,772	$11,003,772	$7,335,848	$7,335,848	$3,667,924	$73,358,481
Interest	$0	$726,196	$1,452,392	$2,178,588	$2,178,588	$2,178,588	$2,178,588	$1,452,392	$1,452,392	$726,196	$14,523,921
Planning	$0	$366,682	$733,364	$1,100,046	$1,100,046	$1,100,046	$1,100,046	$733,364	$733,364	$366,682	$7,333,642
Other	$0	$1,092,878	$2,185,756	$3,278,634	$3,278,634	$3,278,634	$3,278,634	$2,185,756	$2,185,756	$1,092,878	$21,857,563
Total	**$0**	**$9,521,604**	**$19,043,209**	**$28,564,813**	**$28,564,813**	**$28,564,813**	**$28,564,813**	**$19,043,209**	**$19,043,209**	**$9,521,604**	**$190,432,088**

Farm/Mixed-use/Red	**2027**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2034**	**2035**	**2036**	
Land	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Labor	$0	$15,478,189	$30,956,377	$23,217,283	$7,739,094	$0	$0	$0	$0	$0	$77,390,943
Materials	$0	$15,478,189	$30,956,377	$23,217,283	$7,739,094	$0	$0	$0	$0	$0	$77,390,943
Interest	$0	$3,064,458	$6,128,916	$4,596,687	$1,532,229	$0	$0	$0	$0	$0	$15,322,290
Planning	$0	$1,547,353	$3,094,707	$2,321,030	$773,677	$0	$0	$0	$0	$0	$7,736,767
Other	$0	$4,611,811	$9,223,623	$6,917,717	$2,305,906	$0	$0	$0	$0	$0	$23,059,057
Total	**$0**	**$40,180,000**	**$80,360,000**	**$60,270,000**	**$20,090,000**	**$0**	**$0**	**$0**	**$0**	**$0**	**$200,900,000**

PART 2 CONSISTENCY WITH COMPREHENSIVE PLANS

A.

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

Consistency with County Policy Goals

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

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

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

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

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

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

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

  City Park supports the CDMP's direction to evaluate expansions to the UDB only when necessary to accommodate demonstrated need. The proposal will be accompanied by a Needs Analysis demonstrating that existing capacity is

insufficient to meet forecasted residential demand, particularly for workforce and attainable housing within MSA 7.2. The site offers a logical and compact expansion area adjacent to existing infrastructure and development.

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

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

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

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

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

  iii) Priority Areas for Inclusion
  Policy LU-8G establishes specific priority criteria for areas considered most appropriate for UDB expansion:
  a) Lands within Planning Analysis Tiers with the earliest projected supply depletion year
  b) Lands contiguous to the UDB
  c) Locations within one mile of a planned Urban Center or extraordinary transit service

d) Locations with projected surplus service capacity or where public facilities can be readily extended

Response:

- **Planning Analysis Tier:** City Park is located within Miami-Dade County's South-Central Planning Analysis Tier, a tier historically identified as having among the earliest projected urban land-supply depletion and where current County and independent analyses show constrained remaining supply for key land uses. The Applicant's Needs Assessment documents that (a) City Park is located in the Planning Tier with the earliest projected depletion of any area in the County. Because the area (West South-Central Tier) in which City Park is located will run out of developable residential land (both single- and multi-family) in 2027 making the City Park area a priority for inclusion in the UDB, (b)
  County projections indicate single-family land capacity is projected to be depleted countywide by 2029 (creating a shortfall for single-family/townhome product), and (c) the South-Central Tier has very limited remaining industrial and commercial land and is projected by County staff to face industrial depletion in the Tier by the early 2030s. These findings demonstrate that City Park sits within a Planning Analysis Tier with demonstrated early depletion of key land supplies and therefore meets LU-8G(iii)(a)'s priority criterion for UDB consideration.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Recreation and Open Space Element

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

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

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

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

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

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

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Capital Improvements Element

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

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

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

Conservation, Aquifer Recharge, and Coastal Management

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

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

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

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

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

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

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

The proposed **City Park Development of Regional Impact (DRI)** is fully consistent with the Goals, Strategies, and Policies of the **Strategic Regional Policy Plan (SRPP) for South Florida**, as adopted by the **South Florida Regional Planning Council**

(SFRPC). The SRPP provides a regional framework to guide land development, infrastructure investment, environmental protection, and economic growth in Miami-Dade, Broward, and Monroe Counties. City Park directly supports the Plan's overarching goals of sustainable, compact, and coordinated regional development.

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

1. Livable Communities and Regional Planning

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

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

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

2. Transportation and Mobility

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

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

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

3. Affordable and Workforce Housing

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

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

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

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

4. Economic Development

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

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

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

5. Natural Resources and Environmental Resilience

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

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

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

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

6. Regional Coordination and Efficient Growth Management

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

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

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

Conclusion

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

C.

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

1. **Housing (§ 187.201(7), F.S.)**

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

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

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

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

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

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

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

   City Park preserves and enhances ecological function through the inclusion of **250 acres of parks, greenways, and lakes**. These lands are designed to support habitat connectivity, public access, and passive and active recreation. Additionally,

the project employs **native plantings**, bioswales, and open space corridors to maintain ecosystem services and mitigate development impacts.

4. **Land Use (§ 187.201(15), F.S.)**

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

   .

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

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

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

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

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

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

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

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

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

   City Park is proposed on land historically used for low-yield row crop production, a sector of agriculture that has seen **diminishing economic viability** in Miami-Dade County. As documented in recent County and State analyses—including those prepared by the University of Florida—the long-term outlook for farmland demand reflects a **continuing downward trend**.

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

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

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

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

Conclusion

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

Consistency with Section 163.3177(6)(a)9.a., Florida Statutes

Section 163.3177(6)(a)9.a., Florida Statutes, establishes the statutory criteria for evaluating whether a comprehensive plan project promotes urban sprawl. City Park has been designed as a compact, mixed-use, and transit-supportive development that aligns with the State's growth management objectives. The following analysis responds to each of the 13 indicators of urban sprawl identified in Florida law, demonstrating how City Park does not promote the proliferation of urban sprawl and instead advances orderly, efficient, and sustainable development patterns

Section 163.3177(6)(a)9.a. – Primary Indicators

Indicator: (I) Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.

Finding: City Park does not exhibit this indicator. City Park does not promote low-intensity or single-use development. The master plan establishes a compact, mixed-use community integrating residential (single-family detached, townhome, and multifamily), retail, office, civic, educational, and recreational uses. Neighborhood centers are designed to support internal trip capture and future transit readiness. Densities and intensities are structured to support multimodal transportation and public facilities, avoiding large-lot or single-use subdivision patterns commonly associated with sprawl.

Indicator: (II) Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.

Finding: City Park does not exhibit this indicator. The project site is contiguous to the existing Urban Development Boundary and is planned as a coordinated and logical urban expansion area rather than an isolated or leapfrog development in a remote rural location. The project does not promote scattered development at substantial distances from existing urban areas; instead, it extends the urban fabric in a compact and contiguous manner supported by planned infrastructure.

The record includes a demonstrated housing needs analysis reflecting substantial projected population growth and a documented deficit of developable land within the existing urbanized area capable of accommodating demand—particularly for ground-oriented housing types such as single-family detached and single-family attached

(townhome) units. Much of the remaining vacant land within the UDB is fragmented, constrained, or otherwise unsuitable for accommodating these housing forms at meaningful scale. As a result, available lands within the existing urban area are insufficient, on their own, to meet long-term demand for both single-family detached and single-family attached housing in an orderly and infrastructure-supported manner.

Accordingly, the project does not bypass suitable undeveloped lands within the urbanized area. Rather, it represents a comprehensively planned, contiguous urban expansion designed to accommodate demonstrated demand for diverse housing types—including single-family detached and attached units—while coordinating infrastructure, transportation, and public facility planning. The proposal therefore does not promote urban development in rural areas at substantial distances from existing urban areas within the meaning of Section 163.3177(6)(a)9.a.(II), Florida Statutes.

Indicator: **(III) Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.**

Finding: City Park does not exhibit this indicator. The development pattern is internally organized around a connected street grid and mixed-use districts rather than strip or ribbon commercial corridors. Retail and employment uses are clustered within designated centers, not extended linearly along arterial roadways. The project's urban form avoids fragmented or corridor-driven sprawl patterns.

Indicator: **(IV) Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.**

Finding: City Park does not exhibit this indicator. The project site is currently utilized for agricultural row crops and does not contain wetlands, surface waters, native upland habitat, floodplain systems, shoreline features, estuarine systems, or other significant natural resources of the type identified in this statutory indicator. The land has been previously altered and actively cultivated, and it does not function as an intact natural ecosystem.

Notwithstanding the absence of such natural systems onsite, the master plan incorporates modern stormwater management facilities, open space networks, and aquifer protection measures consistent with Miami-Dade County and state environmental regulations. Development areas will comply with applicable environmental permitting standards, ensuring continued protection of regional water resources and environmental quality. Accordingly, the project does not result in the loss of protected natural systems and does not fail to conserve natural resources within the meaning of Section 163.3177(6)(a)9.a.(IV), Florida Statutes.

Indicator: (V) Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.

Finding: City Park incorporates transitional buffering, edge treatments, and phased infrastructure delivery to protect adjacent agricultural operations. The project avoids dispersed encroachment into agricultural lands and establishes a defined urban edge contiguous to the UDB. Concentrated development reduces pressure for incremental, piecemeal agricultural conversion.

Indicator: (VI) Fails to maximize use of existing public facilities and services.

Finding: City Park does not exhibit this indicator. The project connects to and extends existing infrastructure systems in a coordinated manner. Water, sewer, transportation, and public safety services are phased with development to maximize capacity utilization and efficiency. The compact development pattern improves cost-efficiency relative to dispersed rural development.

Indicator: (VII) Fails to maximize use of future public facilities and services.

Finding: City Park does not exhibit this indicator. Infrastructure improvements are programmed concurrently with development phases. School concurrency, roadway improvements, and utility extensions are structured to align with projected population growth, ensuring that future public facilities are utilized efficiently rather than prematurely extended.

Indicator: (VIII) Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.

Finding: City Park does not exhibit this indicator. The Applicant has demonstrated through comprehensive infrastructure and concurrency analyses that existing and planned public facility systems can adequately serve the proposed development without degrading adopted levels of service for surrounding communities.

The application includes detailed capacity evaluations for water, wastewater, transportation, and stormwater systems, each prepared using the methodologies and level-of-service standards adopted by the respective service providers and reviewing agencies. With respect to potable water and sanitary sewer, the analysis relied upon current system capacity data and identified improvements contained within adopted capital improvement programs. The evaluation concluded that sufficient treatment and conveyance capacity exists, or will exist consistent with programmed improvements, to accommodate project demand within adopted level-of-service standards.

Transportation impacts were evaluated in accordance with the approved traffic impact analysis methodology, incorporating existing background conditions, committed development, and programmed roadway improvements. The analysis demonstrated that the roadway network can continue to operate at adopted levels of service with implementation of identified mitigation measures, where applicable. The compact,

mixed-use development pattern further supports internal trip capture and multimodal mobility, reducing external vehicle miles traveled and long-term roadway demand.

Stormwater management was evaluated consistent with applicable County and State criteria, including on-site retention, water quality treatment, and discharge requirements. The project's stormwater system is designed to meet or exceed regulatory standards, ensuring that post-development runoff does not adversely affect adjacent properties or downstream facilities.

In addition, public services such as schools, fire rescue, and law enforcement are addressed through established concurrency and service planning processes to ensure adequate capacity is available concurrent with development phases.

Collectively, these analyses demonstrate that the proposed development will be served by existing and planned infrastructure systems in a manner that maintains adopted levels of service, avoids disproportionate public cost burdens, and does not increase the cost in time, money, or energy of providing and maintaining public facilities. Accordingly, the project does not allow land use patterns or timing that disproportionately increase infrastructure costs within the meaning of Section 163.3177(6)(a)9.a.(VIII), Florida Statutes

Indicator: (IX) Fails to provide a clear separation between rural and urban uses.

Finding: City Park does not exhibit this indicator. The project establishes a clearly defined and contiguous urban expansion area adjacent to the existing Urban Development Boundary, with a deliberate and structured transition to surrounding rural and agricultural uses. The master plan places lower-density residential uses—particularly single-family detached units—along the project's outer edges to create a graduated transition in scale and intensity between urban development and adjacent rural lands.

Accordingly, the project establishes a structured and defensible urban boundary and does not fail to provide a clear separation between rural and urban uses within the meaning of Section 163.3177(6)(a)9.a.(IX), Florida Statutes

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

Finding: City Park does not inhibit infill development. Countywide housing demand requires a combination of infill and coordinated expansion. The project complements infill by providing housing supply and diversity without diverting infrastructure resources disproportionately from existing urban areas.

Indicator: (XI) Fails to encourage a functional mix of uses.

Finding: City Park does not exhibit this indicator. The master plan establishes a comprehensive and intentional mix of residential, employment, retail, civic, educational, recreational, and open space uses organized within walkable

neighborhood districts. Residential uses—including single-family detached, single-family attached (townhome), and multifamily units—are integrated with neighborhood retail centers, schools, parks, civic facilities, and employment areas to create a balanced land use pattern that serves daily needs within the community.

Parks, greenways, and preserved open space are not isolated amenities but are linked throughout the project and connected to residential neighborhoods and mixed-use centers. These open space elements function as both recreational assets and mobility corridors, integrated with a connected street grid, pedestrian pathways, bicycle facilities, and transit-supportive design. The multimodal transportation system provides continuous connectivity among housing, schools, retail, employment, and recreational areas, promoting internal trip capture and reducing reliance on external vehicle trips.

By integrating land uses with parks and open space through a cohesive multimodal network, the project fosters community self-sufficiency, reduces external commuting demand, and advances a compact, mixed-use development pattern. Accordingly, the project does not fail to encourage a functional mix of uses within the meaning of Section 163.3177(6)(a)9.a.(XI), Florida Statutes.

Indicator: (XII) Results in poor accessibility among linked or related land uses.

Finding: City Park does not exhibit this indicator. The master plan is intentionally structured to enhance mobility, access, and multimodal connectivity among residential, commercial, civic, educational, and recreational uses.

The transportation framework is designed to reduce vehicle dependency and promote internal connectivity through a complete street network consisting of boulevards, loop roads, and connector streets organized around pedestrian safety and a clear multimodal hierarchy. This interconnected grid avoids the isolated cul-de-sac patterns commonly associated with sprawl and instead facilitates direct and efficient access between neighborhoods and activity centers.

The plan includes a transit-oriented development node located proximate to a potential future CSX corridor extension and designed to accommodate a regional mobility and transit hub. This area is planned at higher intensity to support future transit service and regional connectivity.

In addition, the project incorporates an integrated system of bicycle and pedestrian infrastructure, including Class I shared-use trails, dedicated bike lanes, and landscaped esplanades. These facilities connect residential neighborhoods to schools, parks, neighborhood retail, and recreational amenities, and provide linkage to regional assets such as the Black Creek Trail.

Daily needs—including grocery, health services, schools, and recreation—are strategically located within walkable proximity to residential areas, promoting internal trip capture and reducing reliance on external vehicular trips.

Collectively, the complete street framework, transit readiness, and integrated pedestrian and bicycle systems ensure strong accessibility among linked land uses. Accordingly, the project does not result in poor accessibility within the meaning of Section 163.3177(6)(a)9.a.(XII), Florida Statutes.

Indicator: (XIII) Results in the loss of significant amounts of functional open space.

Finding: City Park does not exhibit this indicator. The project site is currently utilized for agricultural row crop production, which requires fertilizer application, pesticide use, and irrigation practices. While the land is open in a physical sense, it does not function as preserved or accessible public open space and does not serve recreational, habitat, or community purposes.

The master plan will replace this privately cultivated agricultural land with a coordinated system of publicly accessible parks, greenways, landscaped corridors, and structured open space integrated throughout the community. These open space areas are intentionally designed to provide recreation, connectivity, stormwater management, and community gathering spaces. Open space is distributed throughout the project and linked by pedestrian and bicycle infrastructure, ensuring functional accessibility rather than isolated residual areas.

Accordingly, the project does not result in the loss of significant functional open space. Rather, it converts privately farmed row crop land into an integrated network of accessible parks and structured open space that enhances community function and long-term land stewardship within the meaning of Section 163.3177(6)(a)9.a.(XIII), Florida Statutes.

Section 163.3177(6)(a)9.b. – Development Pattern Characteristics That Discourage Urban Sprawl

Section 163.3177(6)(a)9.b., Florida Statutes, establishes eight indicators to determine whether a comprehensive plan project discourages the proliferation of urban sprawl. Pursuant to the statute, a plan or project is determined to discourage urban sprawl if it demonstrates consistency with at least four of the eight enumerated indicators.

The following analysis evaluates the proposed project against each of the statutory indicators set forth in Section 163.3177(6)(a)9.b. As demonstrated below, the project satisfies well in excess of the minimum statutory threshold. The proposal promotes efficient use of existing infrastructure, improves internal land use balance, reduces vehicle miles traveled, supports conservation of energy, and remedies an existing pattern of residential development lacking proximate neighborhood services.

Accordingly, the project affirmatively discourages the proliferation of urban sprawl within the meaning of Section 163.3177(6)(a)9.b., Florida Statutes.

Indicator: (I) Directs or locates economic growth and associated land development to geographic areas of the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems.

Finding: City Park satisfies this indicator. The project site is currently utilized for agricultural row crop production and does not contain wetlands, surface waters, native upland habitat, natural recharge features, or other functioning natural ecosystems of the type contemplated by this statutory indicator. The land has been actively cultivated and does not function as an intact natural system.

Growth is directed to a contiguous urban expansion area adjacent to the existing Urban Development Boundary, rather than to remote or environmentally sensitive locations. Development is consolidated within a comprehensively planned footprint, avoiding fragmentation of natural systems.

In addition, the project does not adversely impact adjacent agricultural lands. The master plan establishes defined urban edges, buffering, and structured transitions that protect ongoing agricultural operations and reduce the likelihood of incremental encroachment. By concentrating development in a coordinated expansion area rather than allowing dispersed conversion of agricultural lands, the amendment limits broader impacts to agricultural and natural systems.

Accordingly, the proposed amendment directs growth in a manner that does not adversely impact natural resources or ecosystems and is consistent with Section 163.3177(6)(a)9.b.(I), Florida Statutes.

Indicator (II) Promotes the efficient and cost-effective provision or extension of public infrastructure and services.

Finding: City Park satisfies this indicator. The Applicant has demonstrated through detailed infrastructure and concurrency analyses that existing and planned public facility systems can adequately serve the proposed development without degrading adopted levels of service for surrounding communities.

Water and wastewater capacity analyses relied on current system capacity data and adopted capital improvement programs, confirming that sufficient treatment and conveyance capacity exists, or will exist consistent with programmed improvements, to serve project demands within adopted level-of-service standards. Infrastructure extensions are planned in a logical and contiguous manner from existing systems, avoiding fragmented or premature expansion.

Transportation impacts were evaluated using the approved traffic impact methodology, incorporating background conditions, committed development, and programmed roadway improvements. Where necessary, mitigation measures are identified to maintain adopted levels of service. The project's compact, mixed-use form, internal

trip capture, and multimodal transportation framework further reduce long-term external roadway demand relative to dispersed, low-density development patterns.

Stormwater facilities are designed in accordance with County and State criteria, including on-site retention, treatment, and discharge standards, ensuring cost-effective system performance without adverse off-site impacts.

Infrastructure improvements are phased with development to align capacity with demand, thereby avoiding disproportionate public costs and inefficient overbuilding of facilities. By concentrating development contiguous to the Urban Development Boundary and coordinating service delivery through established concurrency and capital planning processes, the amendment promotes efficient and cost-effective provision and extension of public infrastructure consistent with Section 163.3177(6)(a)9.b.(II), Florida Statutes.

Indicator: (III) Promotes walkable and connected communities and provides for compact development and a mix of uses at densities and intensities that will support a range of housing choices and a multimodal transportation system, including pedestrian, bicycle, and transit, if available.

Finding: City Park satisfies this indicator. The master plan is intentionally structured to create a compact, connected community that integrates a range of housing types—including single-family detached, single-family attached (townhomes), and multifamily units—with neighborhood retail, employment, civic, educational, and recreational uses.
Residential densities are organized to support internal trip capture and walkable access to daily needs, including grocery, schools, parks, and neighborhood services. Mixed-use centers are strategically located within short walking and biking distances of surrounding residential neighborhoods, reducing reliance on external vehicle trips and supporting community self-sufficiency.

The transportation framework incorporates a complete street network consisting of interconnected boulevards, loop roads, and connector streets designed around pedestrian safety and a clear multimodal hierarchy. Class I shared-use paths, dedicated bicycle lanes, landscaped esplanades, and sidewalks provide continuous connectivity throughout the community and link to regional assets, including the Black Creek Trail.

In addition, the plan accommodates transit readiness through a designated higher-intensity node proximate to a potential future CSX corridor extension and planned regional mobility hub. This area is designed to support future transit service, reinforcing compact development patterns and multimodal mobility.

By integrating diverse housing types, mixed-use centers, connected street networks, pedestrian and bicycle infrastructure, and transit-supportive design, the amendment

promotes walkable and connected communities consistent with Section 163.3177(6)(a)9.b.(III), Florida Statutes

Indicator (IV) Promotes conservation of water and energy.

Finding: City Park satisfies this indicator. The master plan incorporates forward-looking resiliency measures that promote long-term conservation of water and energy resources consistent with Miami-Dade County policies on sustainability and climate adaptation.

Stormwater infrastructure is intentionally integrated with open space systems, including lakes, greenways, and bioswales designed as dual-purpose features. These elements manage runoff, improve water quality, and reinforce site-wide green infrastructure networks while reducing reliance on energy-intensive mechanical systems. On-site retention and treatment facilities are designed to meet or exceed applicable regulatory standards, improving water management efficiency relative to existing row crop irrigation practices.

Landscape design emphasizes native and climate-adapted plant species, reducing long-term irrigation demand and potable water consumption. Drought-tolerant landscaping and enhanced tree canopy coverage contribute to reduced evapotranspiration stress and improved site-wide water efficiency.

The project also incorporates a designated Farm District that supports localized food production through community-supported agriculture, school partnerships, and demonstration gardens. This feature promotes food resiliency and reduces transportation-related energy consumption associated with long-distance food distribution.

Urban heat island mitigation strategies—including compact land use patterns, shaded public spaces, and expanded tree canopy—reduce ambient temperatures and energy demand for cooling. The project's walkable design, internal trip capture, multimodal street network, and transit readiness further reduce vehicle miles traveled and associated fuel consumption.

Collectively, these design strategies promote conservation of water and energy resources and advance County resiliency initiatives, including Resilient305 and GreenPrint, consistent with Section 163.3177(6)(a)9.b.(IV), Florida Statutes.

Indicator: (V) Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils.

Finding: Structured urban edges and buffering protect adjacent agricultural lands. Concentrated development reduces the likelihood of incremental agricultural land fragmentation.

Indicator: (VI) Preserves open space and natural lands and provides for public open space and recreation needs.

Finding: City Park satisfies this indicator. The project site is currently utilized for agricultural row crop production and does not contain designated open space, preserved natural lands, or publicly accessible recreational areas. The land is privately cultivated and does not function as community open space or protected natural habitat.

In contrast, the master plan establishes a comprehensive and integrated open space framework comprising approximately 249.5 acres—approximately 25 percent of the site. This framework includes:

- **The Central Greenway and Lake System:** Designed as dual-purpose infrastructure providing passive recreation opportunities while functioning as stormwater management and water quality treatment facilities.
- **Community and Pocket Parks:** Distributed throughout the neighborhoods to ensure that all residents are within walking distance of active and passive recreational spaces.
- **The Parkway and Green Connections:** Linear open space corridors that enhance pedestrian and bicycle mobility, reinforce community identity, and provide continuous landscape connectivity.
- **The Farm:** A 10-acre agricultural amenity supporting educational programming, local food production, and community engagement.

These open space systems are intentionally integrated with resiliency infrastructure, embedding stormwater management, shade canopy, and heat mitigation strategies throughout the public realm. Rather than resulting in the loss of preserved open space or natural lands, the amendment converts privately cultivated row crop land into a structured network of publicly accessible parks, greenways, lakes, and civic spaces designed to meet long-term recreation and resiliency needs.

Accordingly, the amendment preserves and substantially enhances open space provision and public recreational access consistent with Section 163.3177(6)(a)9.b.(VI), Florida Statutes.

Indicator: (VII) Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area.

Finding: City Park satisfies this indicator. The master plan establishes an intentional and proportional balance between residential development and supporting nonresidential uses to meet the daily needs of the projected population within the community.

The residential program—including single-family detached, single-family attached (townhome), and multifamily units—is integrated with neighborhood retail centers, grocery services, employment opportunities, schools, parks, civic facilities, and recreational amenities. These uses are strategically distributed throughout the

community and organized around walkable neighborhood centers to support internal trip capture.

By providing employment, retail, educational, and civic uses in close proximity to residential areas, the plan reduces reliance on external commuting and long-distance service trips. The integrated street network, pedestrian and bicycle infrastructure, and transit-ready node further reinforce internal connectivity among residential and nonresidential uses.

This balanced land use pattern responds directly to projected residential demand and avoids the single-use residential development patterns associated with sprawl. Accordingly, the amendment creates a balanced mix of land uses consistent with Section 163.3177(6)(a)9.b.(VII), Florida Statutes.

Indicator: (VIII) Provides uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the vicinity that constitutes sprawl or if it provides for an innovative development pattern such as transit-oriented developments or new towns as defined in s. 163.3164.

Finding: City Park satisfies this indicator. The land use program is intentionally organized around a hierarchy of sub-villages that structure density, intensity, and character across the site, creating a cohesive and legible community form rather than a conventional single-use subdivision pattern.

The master plan distributes land uses in a balanced and integrated manner:

- **Residential (approximately 52% of the site):** 7,800 dwelling units across Low-, Medium-, Medium-High-, and High-Density Residential categories, with target densities ranging from 6 to 30 units per acre, providing a range of housing choices including single-family detached, single-family attached (townhomes), and multifamily units.
- **Non-Residential (approximately 9% of the site):** Over 2,000,000 square feet of commercial, office, and light industrial uses to support internal employment and services.
- **Mixed-Use (approximately 9% of the site):** Transit-Oriented, Village, Park, Industrial, and Farm Mixed-Use designations designed to foster walkable neighborhoods with integrated services and employment.
- **Community Services (approximately 4% of the site):** Schools, civic facilities, and rail corridor improvements supporting public infrastructure and mobility.
- **Open Space and Parks (approximately 25% of the site):** A connected network of parks, lakes, plazas, agricultural areas, and trail corridors integrated throughout the community.

This framework reflects consistency with Miami-Dade County CDMP objectives promoting mixed-use centers, transit-oriented development near future transit opportunities, and land use patterns that balance housing and employment.

Urban design principles further reinforce the innovative character of the development. The plan establishes a mixed-use Village Core as the civic, cultural, and retail heart of the community, along with a designated Transit-Oriented Development (TOD) Center adjacent to a potential future CSX Portland Spur node and proposed regional mobility hub. Compact blocks and a connected street network promote walkability and multimodal choice, while distributed parks, plazas, and civic spaces support public life and community identity.

Development intensities are deliberately scaled to context. Higher-density and vertical mixed-use development is concentrated around transit and activity centers, while lower-density residential forms provide a graduated transition toward the project perimeter. This structured hierarchy of sub-villages creates a coordinated new community rather than dispersed, single-use suburban development.

Collectively, the integrated land use program, transit-supportive design, multimodal framework, and balanced distribution of residential and employment uses constitute an innovative master-planned development pattern consistent with the concept of a new town under Section 163.3164 and satisfy the requirements of Section 163.3177(6)(a)9.b.(VIII), Florida Statutes

Conclusion

Based on the foregoing analysis, City Park does not exhibit the primary indicators of urban sprawl identified in Section 163.3177(6)(a)9.a., Florida Statutes, and affirmatively satisfies multiple development pattern characteristics identified in Section 163.3177(6)(a)9.b. The project reflects compact urban form, infrastructure-supported growth, environmental integration, and functional land use balance. Accordingly, the proposed project discourages the proliferation of urban sprawl under Florida law.

PART 3 DEMOGRAPHIC AND EMPLOYMENT INFORMATION

A. Complete the following demographic and employment information tables.

Project Demographics

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

The prospective City Park housing is anticipated to attract a mix of residents. It is expected that the single-family homes will be dominated by families, while the townhome will potentially be a more balanced mix of families and single or couple occupants. The rental product will be geared more to single and double occupancy, with family in the larger units. As set forth in the analysis of retail demand above, City Park's household characteristics in terms of persons per household and children per household is estimated to be more closely aligned with those characteristics of households Countywide as opposed to the surrounding MSA and RMA which have a considerably higher proportion of single family detached housing.

City Park's housing will support workers within the City Park community, as well as attract a significant number of new residents from outside of the community and south Dade County region at large. **Table 10-Part III.1, Population and Demographic Information**, provides a breakdown of population and demographic components for the prospective housing development.

Table 10-Part III.1
Project Demographics

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

Notes/Sources:

1.) ACS 2023

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

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

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

Project Employment

Direct Construction jobs (also referred to as short-term, non-recurring) created from the development of City Park will total roughly 15,361 FTE's during the City Park development phase 2036. This is based upon development costs (construction) of roughly $2.8 billion and enumerated through the IMPLAN model. Development of the City Park master plan will create more than 7,823 Direct Long-term Recurring FTE's related to industrial/office/retail employment, property and building management, maintenance, security, administrative, executive, among other occupations – and the detail of which is discussed in Question 24 (Housing). The following table provides a summary of Direct Construction and Direct Recurring jobs by income category.

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

Phase	< $29,120*	$29, 121 - $43,600	$43,601 - $69,760	$69,761 $104,640	> $104,640	T
Construction**		1,229	3,379	9,370	1,383	15
Non-Construction		1,637	1,374	2,681	2,131	7,

Source: USHUD; Lambert Advisory; IMPLAN

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

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

TABLE 10 - Part III.3 City Park - Employment by Land Use and Income Cohort					
Phase	**$27, 601 - $43,600**	**$43,601 - $69,760**	**$69,761 $104,640**	**> $104,640**	**Total**
Retail	1,297	797	159	449	2,703
Office	60	217	1,780	1,564	3,621
Industrial	92	202	628	220	1,141
Education	30	30	115	184	358
Total	**1,480**	**1,246**	**2,681**	**2,416**	**7,823**

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

PART 4 IMPACT SUMMARY

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

Vegetation and Wildlife

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

Wetlands

There are no wetlands currently on the site.

Project Development

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

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

TABLE 10.6
PUBLIC FACILITIES CAPITAL COSTS

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

Source: The Curtis Group