

FLORIDA DEPARTMENT OF COMMERCE

Question 10 - General Project Description

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

Response: Under the CDMP, the County's UDB is intended to be a flexible line subject to expansion when a need for additional land to support urban development has been demonstrated (CDMP Policy LU-8F). Policy LU-8G of the CDMP guides the expansion of the UDB by establishing three categories of land outside the UDB:

- Land that shall not be considered for expansion;
- Land that shall be avoided if possible; and
- Land that shall be given priority for inclusion within the UDB.

Among the categories of land that should be avoided under Policy LU-8G are lands designated for Agricultural use. The City Park site is currently designated for Agricultural use under the CDMP.

The CDMP's text, however, does not support the conclusion that any expansion of the UDB into Agricultural areas would be inconsistent with the CDMP. Policy LU-8G with the CDMP requires the County to balance the desire to avoid expanding the UDB into certain areas with both the need to accommodate the need for additional urban land within the UDB and the policy of prioritizing the addition of land with certain listed qualities into the UDB. The following is a description of the three categories of land recognized in Policy LU-8G and the City Park application's compliance with the Policy.

Land that Shall Not be Considered

Policy LU-8G (i) provides that the following areas may not be considered for inclusion:

- (1) the Northwest Wellfield and West Wellfield Protection Areas;
- (2) Water Conservation Areas, Biscayne Aquifer Recharge Areas, and Everglades Buffer Areas designated by the South Florida Water Management District; and
- (3) the Redland agricultural area.

Land that Shall Be Avoided

Policy LU-8G (ii) provides that the following areas shall be avoided when adding land to the UDB:

- (1) Future Wetlands as defined in the CDMP's Conservation and Land Uses Element;
- (2) Land designated for Agricultural use under the CDMP's Land Use Plan ("LUP") map ;
- (3) Category One hurricane evacuation areas east of the Atlantic Coastal Ridge; and
- (4) Project footprints for the Comprehensive Everglades Restoration Plan ("CERP").

It is important to note, that all of the land outside of the UDB is within one or another of the categories of land that "shall be avoided" for UDB expansion under Policy LU-8G (ii).

For example, large portions of the CDMP's Urban Expansion Areas (UEAs), which assuming no other issues, are expected to be included within the UDB sooner than other areas, are designated for Agriculture use on the LUP map. The County has determined that these UEAs, while designated for Agriculture use, should be developed in the near future in order to accommodate the County's growing population.

Policy LU-8G requires the County to balance the need for land to support urban development against the desire to protect viable agricultural or environmentally important lands. That is where the third category of land recognized in Policy LU-8G, lands that should be encouraged for inclusion, becomes relevant.

Land that should Be Given Priority for Inclusion

Policy LU-8G (iii) provides the following areas should be given priority for inclusion in the UDB: (1) Land within Planning Analysis Tiers having the earliest projected date of depletion of supply; (2) Land contiguous to the UDB; (3) Locations within one mile of a planned urban center or extraordinary transit service; and (4) Locations having projected surplus service where necessary facilities and services can be readily extended. City Park's location is consistent with all four of the criteria of Policy LU-8G (iii).

First, City Park is located in the Planning Tier with the earliest projected depletion of any area in the County. Based on the County's estimates, 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.

Second, City Park is immediately contiguous to the existing UDB line.

Third, City Park is located within a mile of extraordinary bus service and the developer commits, as a condition of Development of Regional Impact approval, to work with the Miami-Dade Transit Agency to ensure that the extraordinary bus service is both maintained and extended to serve the entire City Park community.

Finally, City Park is in an area where infrastructure and services can be readily extended. The developer commits, as a condition of Development of Regional Impact approval, to extending all required infrastructure to the site at its expense.

Application of Balancing Test to City Park

Policy LU-8G does not end when it is determined that a parcel of land is within an area that "shall be avoided" for inclusion in the UDB. If that was the end of the inquiry, no land could ever be added to the UDB in Miami-Dade County, a result which is inconsistent with the requirement of CDMP Policy LU-8F that the UDB contain sufficient land to accommodate at least 10 years of urban growth.

Consistency with CDMP Policy LU-8F

Urban Development Boundary Capacity and Adequacy of Land Supply

Policy LU-8F of the Miami-Dade County Comprehensive Development Master Plan (CDMP) provides that the Urban Development Boundary (UDB) should contain sufficient developable land to accommodate at least ten (10) years of projected countywide residential demand, including development and redevelopment at recommended densities around transit stations, and that the adequacy of non-residential land supplies be evaluated based on the appropriate geographic scale, including countywide supply, Tiers and Half-Tiers, Minor Statistical Areas (MSAs), Census Tracts, or combinations thereof, depending on the type of use.

Based on the City Park Needs Assessment (August 2025), the proposed City Park development is consistent with Policy LU-8F for the reasons set forth below.

Residential Land Supply and 10-Year Planning Horizon

The Needs Assessment demonstrates that while Miami-Dade County retains long-term capacity for multifamily housing, the County faces a near-term deficiency in land capable of accommodating single-family detached and attached (townhome) housing, which is a critical component of countywide residential demand.

County data cited in the Needs Assessment indicate that remaining single-family capacity

will be depleted by approximately 2029, which is less than the ten-year planning horizon required by Policy LU-8F. The remaining supply represents less than five percent of the existing single-family housing stock and is further constrained by market factors such as ownership patterns, environmental limitations, and infeasibility of assembling or developing many remaining parcels. This effective depletion is reflected in declining permitting activity despite continued demand for single-family and townhome housing.

The Needs Assessment further documents that households with children and middle-income working families—who comprise a substantial share of the County’s workforce—demonstrate a strong preference for single-family and townhome housing and are disproportionately impacted by the lack of available land for these housing types. The inability of the existing UDB to accommodate this demand has contributed to sustained net domestic out-migration of working households.

City Park addresses this documented deficiency by providing a substantial supply of single-family detached and attached housing as part of a mixed-use master-planned community. By adding developable land capable of accommodating housing types projected to be depleted within the 10-year horizon, the project directly advances the intent of Policy LU-8F to ensure that the UDB meaningfully accommodates projected residential demand.

Housing Mix and Density Considerations

City Park proposes approximately 7,800 residential units, including a combination of single-family, townhome, and multifamily units. Approximately 29 percent of the units are multifamily, ensuring a mix of housing types consistent with CDMP policies encouraging mixed-density communities and minimum density thresholds for UDB expansions.

While Policy LU-8F references redevelopment and higher densities around transit as part of the County’s overall capacity analysis, the Needs Assessment demonstrates that higher-density capacity alone does not address the documented shortfall in lower-density housing suitable for middle-income and family households. City Park supplements existing higher-density capacity by providing housing types that cannot be feasibly accommodated within the remaining land inside the UDB, thereby improving the functional adequacy of residential land supply.

Industrial Land Supply – Tier-Based Analysis

Policy LU-8F requires that the adequacy of land for regional commercial and industrial uses be evaluated based on Tiers, Half-Tiers, and countywide supply. The City Park property is located within the South-Central Tier.

The Needs Assessment shows that vacant industrial land in the South-Central Tier is severely constrained, with less than 75 acres remaining and projected depletion by approximately 2033, even under conservative County absorption assumptions. Most remaining parcels are small and unsuitable for modern industrial and distribution uses, which typically require larger, contiguous sites.

City Park proposes approximately 73 acres of contiguous industrial land, representing a modest but necessary addition to industrial land supply within a Tier that is projected to

reach depletion within the Policy LU-8F planning horizon. The provision of industrial land at City Park is therefore consistent with LU-8F's Tier-based adequacy evaluation and supports continued economic activity and employment growth in this part of the County.

Commercial and Office Uses – Subarea-Based Adequacy

For neighborhood- and community-oriented commercial and office uses, Policy LU-8F requires evaluation at a localized geographic scale such as Census Tracts and MSAs. The Needs Assessment evaluates commercial land supply within Census Tract 196 and MSA 6.2, finding that these areas are underserved relative to County averages, with very limited vacant commercial land and vacancy rates below two percent.

The analysis further demonstrates that City Park will generate substantial internal demand for retail and office space based on its projected residential population and employment base. Existing vacant commercial land within the surrounding subarea is insufficient, both in quantity and configuration, to accommodate this demand.

By planning retail and office uses within the City Park development itself, the project aligns commercial capacity with localized demand, supports internal trip capture, and maintains an appropriate balance between residential and employment uses, consistent with Policy LU-8F.

Conclusion

Based on the City Park Needs Assessment, the proposed City Park development is consistent with CDMP Policy LU-8F because it:

- Addresses a documented shortfall in single-family residential land within the 10-year planning horizon;
- Supplements existing higher-density capacity with housing types necessary to meet countywide residential demand;
- Provides needed industrial land within a Tier projected to reach depletion;
- Aligns neighborhood- and community-oriented commercial and office uses with localized subarea demand; and
- Ensures that the UDB contains not only theoretical capacity, but practical, market-viable land capable of sustaining Miami-Dade County's projected residential and economic growth.

Accordingly, the City Park proposal satisfies the intent and requirements of Policy LU-8F.

2. Will data centers be an allowable use within the master-planned development?

Response: Yes. Data centers are an allowable use within the master-planned development. The approved land use framework, including the governing master plan, regulating plan, and associated development regulations, does not include any prohibitions or limitations that would preclude data centers or similar technology-oriented facilities. As such, data centers are permitted to locate within the development, subject to compliance with all applicable zoning standards, development regulations, and agency review requirements in effect at the time of site-specific approval.

Any future data center would be required to meet applicable performance standards related to site design, infrastructure capacity, utilities, environmental protection, and compatibility with adjacent uses, including compliance with building codes, fire protection standards, and utility coordination requirements. Site-specific impacts—such as power demand, cooling systems, noise, and access—would be evaluated through the normal development review process to ensure consistency with the master-planned development approvals and adopted County regulations.

Accordingly, the master-planned development does not restrict data centers as a land use, and their inclusion would be evaluated and regulated in the same manner as other permitted non-residential or employment-generating uses within the project.

Question 21- Transportation

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

A.5: Existing Traffic Conditions

D.2: Future Background Traffic

E.3: Project Impacts on Regionally Significant Roadways

H: Protection of Transportation Corridors

Response: Comment noted. Please refer to the revised report.