MIAMI-DADE COUNTY

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

1. **After reviewing the proposed development program presented in the application, inconsistencies in the total number of units for the breakdown of the residential components were found between the DRI ADA Question 10 -Table 10.A.1, and the DRI ADA Question 17-Table 17-1.**

   Response: The noted inconsistencies have been resolved with this submittal.

2. **In order to calculate the water/sewer demand, clarification is needed for the breakdown of the residential development units, as well as the total square footage of the schools and if any bathrooms will be included in the park.**

   Response: The noted inconsistencies have been resolved with this submittal. Please refer to the revised Water and Sewer Master Plan for the breakdown of the demands.

3. **The development breakdown by Village is also required to assess the impact on the water and sewer infrastructure.**

   Response: Please refer to the revised Water and Sewer Master Plan for the breakdown of the demands.

4. **Per Chapter 24 of the Miami-Dade County Code, the water/sewer demand for schools is calculated based on square footage and not the number of students, as noted in Table 17-1, and needs to be revised.**

   Response: The table has been revised to reflect the calculated square footage. Refer to the revised Water and Sewer Master Plan.

<u>Specifically Regarding Water Control (Attachment 19-1)</u>

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

   Response: The Applicant has reviewed the Water Control Section's comments regarding "Attachment 19-1: Conceptual Stormwater Management Master Plan," signed and sealed by Michael P. Carr, P.E., dated August 22, 2025, and respectfully submits that the proposed stormwater framework is consistent with Objectives CON-4 and CON-5 of the Miami-Dade County Comprehensive Development Master Plan (CDMP).

Objective CON-4 – Aquifer Recharge, Water Storage, and Flood Protection

Objective CON-4 requires that aquifer recharge and water storage capacity in western and southern Miami-Dade County be maintained or increased, and that stormwater management systems be planned and implemented in a manner that provides flood protection, corrects system deficiencies, maintains water quality, and avoids adverse impacts to easterly developed areas.

The Conceptual Stormwater Management Master Plan has been expressly designed to meet these requirements. The plan emphasizes **on-site retention and storage**, utilizing a distributed system of lakes, retention areas, canals, and green infrastructure to maintain or enhance pre-development storage capacity. By retaining stormwater on site and controlling discharge rates, the proposed system avoids increasing peak flows to downstream or easterly drainage systems and does not impair flood protection for developed areas of the County.

Consistent with County stormwater basin planning principles, the project's stormwater system is designed to function independently and does not rely on new or expanded County-maintained drainage facilities outside the Urban Development Boundary. This approach ensures that development of the site will not exacerbate urban sprawl, reduce regional water storage, or transfer flood risk to adjacent basins.

In addition, the conceptual design incorporates water-quality treatment features consistent with basin master plan objectives, including extended detention, vegetated conveyance, and staged treatment prior to discharge. These features support aquifer recharge where feasible and contribute to maintaining or improving downstream water quality.

Objective CON-5 – Integrated Water Management and System Resilience

Objective CON-5 emphasizes coordinated water management that supports long-term sustainability, resilience, and compatibility with Countywide stormwater planning efforts.

The proposed stormwater management framework is consistent with this objective by aligning with County cut-and-fill criteria, basin planning assumptions, and regional hydrologic conditions. The system is sized to accommodate future conditions, including higher groundwater elevations and more intense rainfall events, thereby supporting long-term operational reliability and climate resilience.

The conceptual plan is intended to be refined during subsequent site plan and permitting stages in coordination with the County and applicable water management agencies. This phased approach is consistent with the CDMP's basin-planning framework and ensures that final design will reflect the most current technical standards and basin-specific requirements at the time of development.

In summary, the Conceptual Stormwater Management Master Plan maintains or enhances on-site water storage, protects aquifer recharge functions, avoids adverse impacts to easterly developed areas, and does not rely on new County drainage facilities outside the Urban Development Boundary. The plan is therefore consistent with Objectives CON-4 and CON-5 of the CDMP and supports the County's long-range stormwater management and water resource protection goals

6. The report has the following deficiencies that must be addressed:

a. Page 28 of 41, "Stage vs. Storage Calculations," must remove the storage attributed to the building (Column 8) from the 100-year/3-day flood-routing calculation.

Response: This change has been made. Please refer the revised Conceptual Stormwater Management Master Plan. The building area is providing no available storage in flood routing calculations.

b. Provide the conceptual location of the proposed 66-acre lake(s).

Response: The conceptual site plan showing locations of the stormwater BMP's and the lake is included in the revised Conceptual Stormwater Management Master Plan.

c. Provide the conceptual location of the proposed 56 acres of parks.

Response: The conceptual site plan showing locations parks is included in the revised Conceptual Stormwater Management Master Plan.

d. The project is assumed to discharge to the lake(s). However, the report does not acknowledge that the land use (former agricultural lands) requires an environmental assessment, and that the use of lakes for stormwater retention may be limited due to potential contamination. Revise the report to acknowledge the potential presence of contamination and the resulting limitations.

Response: The required environmental study will be completed at the time of permitting. There are multiple acceptable methods to address the potential soil and groundwater contamination if encountered to not cause an adverse regional impact.

e. The report states that exfiltration trenches will be designed for the 5-year, 1-hour storm event prior to discharge to the on-site wet-retention area, and runoff volumes are calculated with a 3.28-inch credit. This credit can only be granted if the exfiltration trenches are designed for the 5-year/1-day storm event. Revise the calculations accordingly.

Response: The revised exfiltration trench calculations are included in the revised Conceptual Stormwater Management Master Plan to include the required trench for the 5-year/1-day storm event.

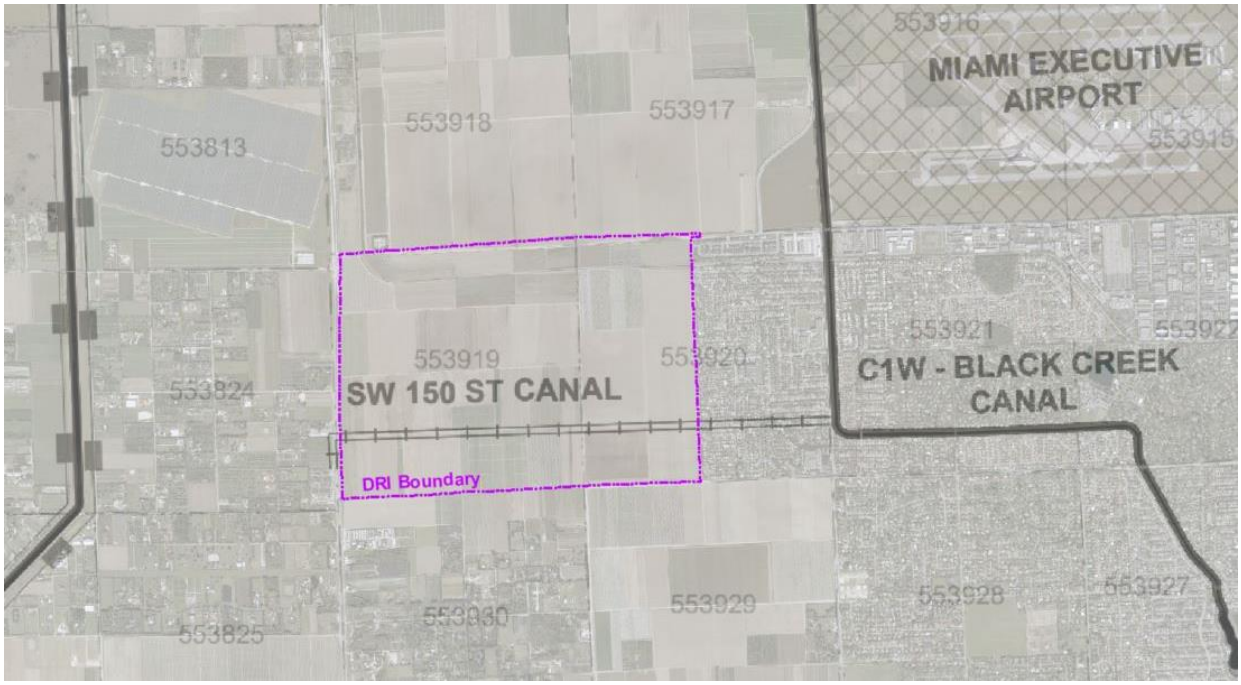
f. The exfiltration trench calculations on page 33 of 41 use a hydraulic conductivity (K) of 9.79E-04. Clarify the basis and assumptions for the selected K value, or provide a copy of the signed and sealed geotechnical report.

Response: The hydraulic conductivity used in the conceptual design was referenced

from nearby approved stormwater permits. The reference is included in the revised Conceptual Stormwater Management Master Plan. Additional percolation testing will be provide at the time of permitting in accordance with the Miami-Dade County requirements.

g. The report does not address the canal reservations or the planned canal. The planned canal is assumed to provide flood protection within the area, including lands west and south of the proposed development. The conceptual stormwater master plan must demonstrate that the project will not diminish the level of flood protection, accounts for the planned canal, is not in conflict with it, will not interfere with the historic or required conveyance functions of stormwater infrastructure in the area, and explains how the planned canal's level of service will be maintained.

Response: The Miami-Dade County Water Control Master Plan (WCMP) only indicates one planned secondary canal (SW 150 ST) in the area. The SW 150 ST secondary canal cannot be implemented as shown on the WCMP. The residential development east of the City Park site prevents the connection to the C1W – Black Creek Canal, as shown on the WCMP; therefore, the planned conveyance is not possible. The City Park project will provide 100% retention of the 100-yr, 3-day storm event and, if needed, accommodate or pass through any adjacent property stormwater. The SW 150 ST secondary canal should not be needed for area drainage. Nonetheless, the secondary canal is addressed in the revised Conceptual Stormwater Management Master Plan. The applicant has met with staff from the Miami Dade County Water Control Section and initiated the process for removal of the SW 150 ST secondary canal from the WCMP and release of the two (2) canal reservation deeds (152 and 166). The formal process for evaluation of this request is being coordinated amongst the relevant Departments of Miami-Dade County.



h. The property is encumbered by two 130-foot-wide canal reservations along the western and southern boundaries, recorded in Miami-Dade County Official Record Book 7131, Page 561, and Official Record Book 7118, Page 390. Revise the report to acknowledge that no development can be approved within these canal reservations.

Response: The report has been revised to acknowledge that no development can be approved within the canal reservations unless the appropriate Class III permit is obtained or the canal reservation is converted to final canal ROW. The applicant has discussed the subject canal reservations (Deeds 152 and 166) with staff from the Miami Dade County Water Control Section and a formal request for release of the canal reservations has been submitted. The evaluation of this request is currently being coordinated by the relevant Departments of Miami-Dade County.

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

Question 9. Maps

7. Map C - Topographic must specify whether the contour elevations are measured in feet or another unit. Additionally, it must indicate the vertical datum used (e.g., NAVD88 or NGVD29). Lastly, the base flood elevation should be clearly identified on the map.

Response: The enclosed Map C – Topographic has been revised to specify that the contour elevations are measured in feet, as shown in the legend description (Contour – ft). The contours are depicted on one-foot intervals and were created using the Digital Elevation Model (DEM) raster dataset from the LiDAR collected for the 2018 ITD LiDAR project. This DEM was obtained from the Miami-Dade County Open Data Hub as the "2018 Miami-Dade County DEM 5ft." This data source has been identified on the map. Additionally, the vertical datum for the elevation data has been indicated as NAVD88.

The enclosed map has also been revised to clearly identify the base flood elevation (BFE), as determined from the available dataset of the Federal Emergency Management Agency (FEMA) flood hazard zones within Miami-Dade County. This data was also obtained from the Miami-Dade County Open Data Hub as "FEMA Flood Zone." According to the dataset, most of the City Park property is delineated as FEMA Flood Zone AH, which corresponds to a BFE of 9.0' NGVD29 (7.5' NAVD88). The FEMA dataset is referenced to the NGVD29 datum; however, the BFE has been provided in both datums on the map. The FEMA data is provided as Flood Insurance Rate Maps (FIRMs) that constitute the full dataset. The FIRMs relevant to the City Park project site are as follows: 12086C0440L, 12086C0439L, and 12086C0580L (as referenced in the FEMA National Flood Hazard Layer Viewer).

8. Map G – Sampling Locations: Spell out "DTW".

Response: The enclosed Map G – Sampling Points has been revised to clarify that the irrigation well locations were sampled for "Distance to Water" (DTW) measurements.

Question 10. General Project Description

9. Page 10-1: The reported acreage is inconsistent between the DRI and the CDMP applications. Please clarify and confirm the correct gross and net acreage of the application site to ensure consistency across all documents submitted to the County and to SFRPC.

Response: The application site consists of three different components that make up the "Total Application Area:" 1) the land owned by the Applicant; 2) lands abutting the south half of theoretical SW 152 Street and the north half of theoretical SW 136 Street that are zoned rights of way owned by non-applicants; and 3) lands dedicated and/or developed as Krome Avenue.

The gross acreage of the lands owned by the Applicant is 953.70 acres (931.14 net acres). The net area accounts for dedications to the north half of SW 152 Street, the south half of SW 136 Street, and the west half of SW 162 Avenue.

We are including in the Total Application Area the portions of SW 152 Street and SW 136 Street owned by non-applicants because the City Park development program anticipates

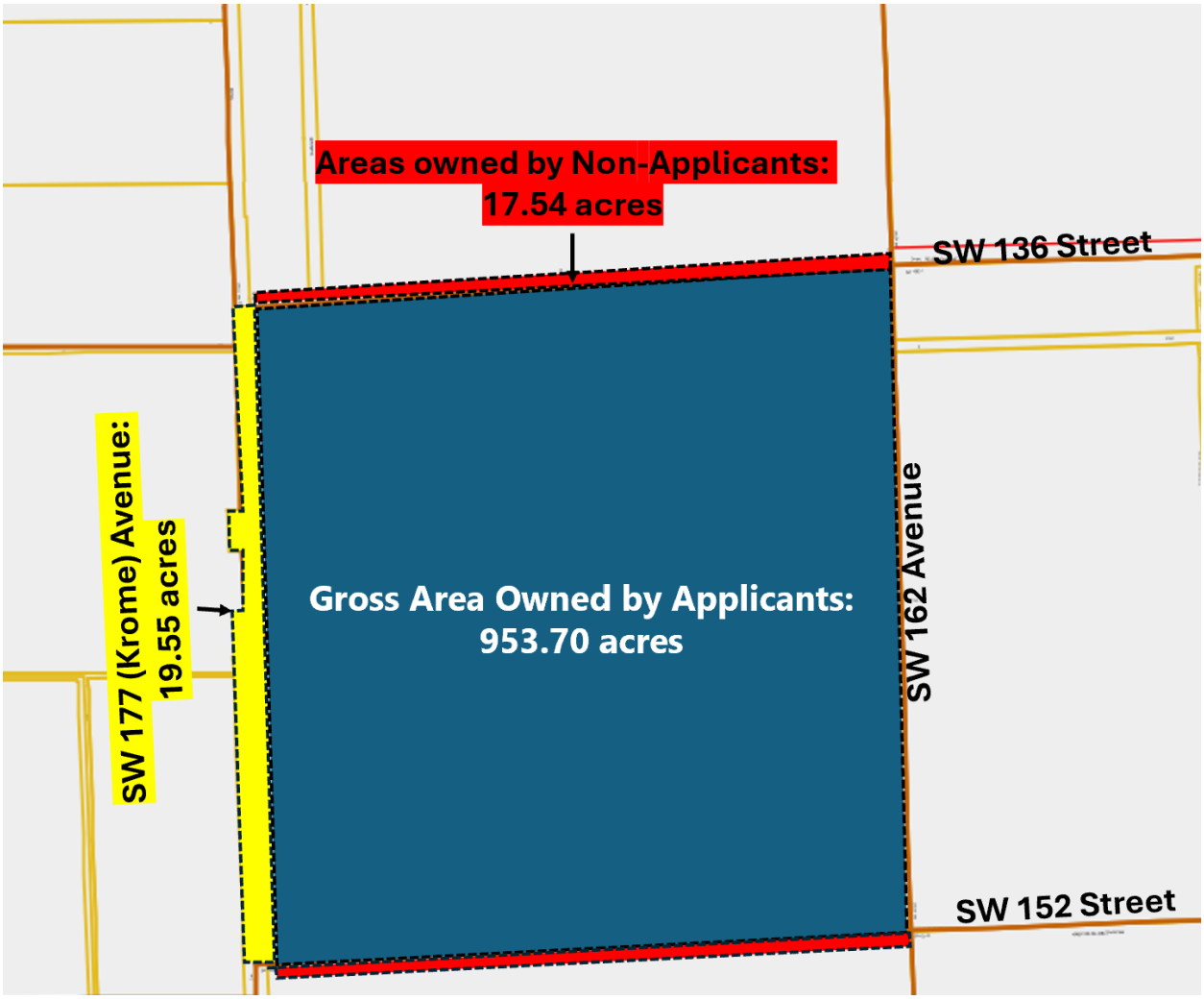
the Applicant will develop the full width of these future rights of way. Only the portions of the non-applicant owned properties that are earmarked for future right of way, either by Right of Way Agreement or Chapter 33-133 of the County Code, are included. The gross area of the non-applicant owned property is 17.54 acres (0 net acres owned by non-applicants are being included in the Total Application Area).

Finally, the fully dedicated and improved portions of Krome Avenue between SW 136 Street and SW 152 Street are within the Total Application Area. The area of Krome Avenue within the Total Application Area is 19.55 acres.

In sum:

Total Gross Application Area	990.79 acres
Total Net Application Area	931.14 acres
Gross Area Owned by Applicants	953.70 gross acres (931.14 net acres)
Area Owned by Non-Applicants	17.54 acres (0 net acres – all zoned right of way)
Area of Krome Avenue between SW 136 ST and SW 152 Street	19.55 acres (0 net acres – all existing right of way)

The portions of the Total Application Area owned by Applicants, owned by non-applications, and consisting of Krome Avenue are illustrated below.



10. Page 10-2: If the 7,800 units are designated for residential use, please clarify the number of residential units separately proposed for mixed-use development.

Response: 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.

The mixed-use residential units are distributed among the designated mixed-use categories as follows:

- Live/Work: 162 dwelling units
- TOD Mixed-Use: 393 dwelling units
- Village Mixed-Use: 317 dwelling units
- Park Mixed-Use: 780 dwelling units

These 1,652 mixed-use dwelling units are fully included within—and not in addition to—the 7,800-unit total residential program analyzed throughout the Application. No separate

or incremental residential unit count is proposed beyond the 7,800 dwelling units.

11. Page 10-2: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed.

Response: References to the CSX Portland Spur are provided for contextual planning purposes only based on its identification in adopted and publicly available long-range transportation and freight planning documents. The CSX Portland Spur is not a committed, funded, designed, or scheduled project, is not being proposed by the Applicant, and is not relied upon to address transportation impacts, concurrency, or mitigation for the Project. No project documentation, approvals, or implementation commitments exist at this time. Accordingly, the Project's transportation analysis does not assume or depend upon the future implementation of the CSX Portland Spur.

12. The "Proposed Development Program" table, Table 10.A.1 does not show the mixed-use development program including number of units nor square footage of non-residential use.

Response: The mixed-use development program is fully reflected and incorporated into the overall residential and non-residential totals summarized in the Application. Table 10.A.1 presents aggregate land use totals.

Specifically, of the 7,800 total residential dwelling units, 1,652 units are proposed within mixed-use categories, including Live/Work, TOD Mixed-Use, Village Mixed-Use, and Park Mixed-Use. These units are included within, and not in addition to, the total residential program.

With respect to the non-residential uses associated with the City Park mixed-use development, and categorized as Retail in Table 10.A.1, the total 673,902 square feet of Retail space includes both stand-alone retail development and retail space embedded within the project's mixed-use categories. The mixed-use retail components are distributed as follows: TOD Mixed-Use (107,061 square feet), Village Mixed-Use (86,390 square feet), Park Mixed-Use (11,323 square feet), Farm Mixed-Use (30,000 square feet), and the retail portion of Industrial Mixed-Use (64,613 square feet). Collectively, these mixed-use components account for 299,387 square feet of the total Retail program. The remaining 374,515 square feet consists of stand-alone retail development.

Accordingly, the mixed-use residential unit counts and non-residential square footage are accounted for in the total development program and are not shown as separate line items in Table 10.A.1 to avoid double counting.

13. Page 10-3: Please provide studies, data, or supporting documentation demonstrating that the proposed development pattern will lead to a measurable reduction in reliance on all types of single-occupancy vehicles.

Response: The proposed City Park development pattern is intended to reduce reliance on single-occupancy vehicles by applying the established "5D" travel-behavior framework—density, diversity of uses, design/connectivity, destination accessibility, and distance to transit—which multiple peer-reviewed meta-analyses and practice guides conclude is associated with lower vehicle trip rates/VMT and higher walking, biking, and transit shares in mixed-use, connected environments. Supporting documentation will include: (1) the proposed master-planned, mixed-use land use program (including mixed-use residential and neighborhood-serving commercial components) and internal pedestrian/bicycle network that shortens trip lengths and enables internal capture; (2) the project transportation impact analysis documenting the multimodal assumptions and resulting trip generation/assignment outcomes; and (3) citations to widely used technical references (e.g., Ewing & Cervero meta-analysis on the built environment and travel; national guidance such as the Institute of Transportation Engineers and FHWA resources) demonstrating the relationship between compact, mixed-use, walkable development patterns and measurable reductions in SOV use and VMT. Consistent with these sources,

City Park's land use mix and connected block/network structure are designed to increase the share of trips that can be made by walking, biking, and shared modes and to reduce average trip length and external trip making, thereby reducing SOV reliance relative to conventional single-use suburban development patterns

14. **Page 10-4: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed. Submit detailed information about this project**.

Response: See response to item 11., above.

15. **Page 10-4: Provide the maximum and average walking distance from the farthest residential units to their nearest commercial/infrastructure areas to serve resident daily-need land uses (e.g., grocery, pharmacy, school, transit stop). This information is essential to evaluate the walkability and functional integration of the proposed development.**

Response: Based on the attached City Park Regulating Plan / Master Plan (included in the concurrent CDMP amendment and UDBPAD Zoning applications), the development is structured around a central Village Core and multiple mixed-use nodes (Village Mixed-Use, TOD Mixed-Use, Park Mixed-Use, and neighborhood commercial areas) that are intentionally distributed to ensure walkable access from surrounding residential areas

Using the internal street network, block structure, and spatial relationship shown on the Regulating Plan:

- **Maximum walking distance**:
  The farthest residential areas—generally located at the outer edges of the plan near the western and southern residential neighborhoods—are approximately 0.6 to 0.75 miles (about 10–15 minutes walking time) from the nearest daily-needs destination, such as a mixed-use commercial area, school, park-anchored activity node, or planned transit stop along the primary internal corridors.
- **Average walking distance:**
  Due to the central placement of the Village Core, internal loop road, and multiple neighborhood-scaled mixed-use nodes, the average walking distance from residential units to daily-need uses is approximately 0.25 to 0.35 miles (about 5–7 minutes walking time).

Daily-need land uses—including neighborhood-serving retail, schools, parks, civic facilities, and planned transit corridors—are embedded within or directly adjacent to residential neighborhoods, rather than concentrated at the perimeter. The master plan's connected street grid, internal loop road, and dedicated pedestrian and bicycle facilities further reduce effective walking distances and improve functional integration, as illustrated on the Regulating Plan's street hierarchy and bike/pedestrian network sheets.

Accordingly, the proposed development pattern is designed so that most residents can

meet routine daily needs within a comfortable walking distance, supporting walkability, internal trip capture, and reduced reliance on single-occupancy vehicle travel.

16. Page 10-5: The acreage shown in this page differs from the acreages shown in the CDMP application.

Response: See response to item 9., above.

17. Table 10-2: As stated previously, this table does not provide the number of residential units for the mixed-use component of the proposed development.

Response: See responses to items 10 and 12, above.

18. Page 10-5: Please provide a land contamination assessment for the site. If the site is designated or suspected to be a brownfield, include documentation of its status, any remediation plans, and any coordination with applicable environmental agencies.

Response: The required environmental study will be completed at the time of permitting. There are multiple acceptable methods to address the potential soil and groundwater contamination if encountered to not cause an adverse regional impact.

19. Page 10-6: The trade area analysis does not appear to be centered on the actual proposed locations of the retail components within the site. Please resolve this.

Response: The trade area analysis was intentionally centered at the primary entrance to the City Park development, which functions as the common access point and market gateway for all on-site retail components. This approach is consistent with standard market analysis practice for master-planned developments with multiple, distributed retail nodes, where retail locations operate collectively as part of a single, integrated project rather than as isolated shopping centers.

Because the on-site retail program is internally distributed among neighborhood-serving and mixed-use locations and is accessed through a shared internal circulation system, defining the trade area from the project entrance provides a conservative and representative market capture framework for evaluating demand and supportable square footage. There is no requirement to define or analyze separate trade areas for each individual retail component within the site at this stage of planning.

Accordingly, the trade area analysis appropriately reflects the overall market context for the proposed retail uses and does not rely on parcel-specific retail siting, which will be refined at later phases of site planning without increasing the total commercial program.

20. Page 10-8: A map of the Residential Market Area is needed.

Response: A map of the residential market area has been provided in the response to the Question.

21. Page 10-9: Please explain why the County's population projections are not used.

Response: 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. Specifically, no updated projections have been issued by the County's Regulatory and Economic Resources Department (RER) or other County agencies for the defined RMA or for similarly localized planning areas. The Applicant has confirmed with County staff that no separate, more current County-issued projections are available for use in lieu of the TPO forecasts.

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.

22. Page 10-9: Is this total growth for the 30-year period specified? Furthermore, it is already 2025, so 10 years or 1/3 of that period has already passed. Please clarify.

Response: The referenced growth reflects total projected growth over the full 30-year period identified in the analysis and is based on the Transportation Planning Organization (TPO) projections from the 2045 Long-Range Transportation Plan (LRTP), which cover the period 2015 to 2045.

The analysis applies the average annual growth rates (both numeric and percentage-based) derived from the TPO projections for this period. It does not assume that one-third of the growth period has already elapsed simply because calendar year 2025 has commenced; rather, it relies on the long-range, prospective growth framework established by the TPO.

It should also be noted that the TPO provides only two growth period categories for demographic forecasting: 2015–2035 and 2015–2045. Using household growth rates, the 2015–2035 period is only moderately below the 2015–2045 period, with an average annual increase of approximately 1.0 percent compared to 1.2 percent, respectively. As a result, use of the 30-year 2015–2045 projection provides a reasonable and consistent basis for evaluating long-term growth conditions relevant to the Project's planning horizon.

The narrative will be clarified to explicitly reference the TPO 2045 LRTP baseline years and growth intervals to avoid any misunderstanding regarding the timing and applicability of the projections

23. Page 10-9: Provide justification for the assumption that the RMA's growth outlook will reach average annual growth rate in line with historical growth trends and even higher.

Response: The assumption that the Regional Market Area's (RMA) growth outlook will achieve average annual growth rates consistent with, and in some cases slightly higher than, historical trends is based on the methodology defined in the Application and summarized above and is expressly consistent with the Agreement to Delete, which establishes the RMA as the appropriate geographic framework for evaluating growth, demand, and market conditions.

As required by the Agreement to Delete, the analysis relies on adopted regional growth projections prepared by the Transportation Planning Organization (TPO), which incorporate historical growth patterns, regional land availability, infrastructure capacity, and adopted policy assumptions. These projections form the basis for the average annual growth rates applied to the RMA and are routinely used by public agencies for long-range planning. Nonetheless, the updated Application provides additional support to the consideration of higher growth rate trends.

24. Page 10-9: Include other developments occurring in the RMA and their projected population growth accommodation, including infill development on individual lots.

Response: The requested information is not required as part of the DRI ADA and was not agreed to in the executed Agreement to Delete Questions.

The DRI ADA methodology focuses on evaluating the impacts of the proposed Development of Regional Impact based on its own program, phasing, and demand characteristics, in combination with adopted background conditions and regionally recognized planning assumptions. Neither the DRI statute nor the ADA instructions require a parcel-by-parcel or project-by-project inventory of other developments within the Regional Market Area (RMA), including speculative infill development on individual lots.

Further, the Agreement to Delete Questions establishes the scope of remaining analyses to be completed by the Applicant. That agreement does not require identification or quantification of population growth attributable to unrelated developments within the RMA, nor does it require the Applicant to assess the cumulative population accommodation capacity of infill development on individual parcels.

To the extent background growth assumptions are relevant, such growth is already reflected in adopted population projections, regional forecasts, and agency-accepted datasets that form the basis for transportation, housing, and public facilities analyses. Requiring the Applicant to independently inventory or forecast other development activity within the RMA would be duplicative of adopted planning processes and inconsistent with the agreed-upon scope of the DRI review.

Accordingly, the requested information exceeds the requirements of the DRI ADA and the scope established in the Agreement to Delete Questions and is therefore not provided.

25. Page 10-10: The population multiplier used is lower than the County's population multiplier. The County multiplier for this Minor Statistical Area calculates a population of 22,296 people resulting from the proposed development.

Response: The population multiplier used for City Park is intentionally lower than the County multiplier and is consistent with the methodology explained in the Application and further clarified below.

The County's calculation appears to rely on the Minor Statistical Area (MSA) 2023 American Community Survey (ACS) population-per-household (PPH) factor of approximately 3.1, which reflects an area where single-family detached units comprise approximately 63 percent of the housing stock. By comparison, the Miami-Dade Countywide 2023 ACS PPH is approximately 2.67, with single-family detached units comprising about 38 percent of all dwelling units.

The City Park housing program differs materially from the MSA context. City Park is planned with a higher-density housing mix dominated by attached and multifamily units, with approximately 13 percent single-family detached units. Empirical demographic data consistently show that areas with higher proportions of multifamily and attached housing types exhibit lower average household sizes than predominantly single-family detached areas.

Accordingly, the use of the Countywide PPH multiplier (2.67)—rather than the higher MSA-specific multiplier—is a conservative and more appropriate assumption given City Park's planned unit mix and density. Applying the higher MSA multiplier would overstate population outcomes relative to the Project's housing characteristics. The population estimate used in the analysis therefore represents a realistic and conservative reflection of anticipated household sizes for the proposed development.

26. Page 10-11: It is necessary to estimate the typical salaries associated with the proposed job types to determine how many individuals earning those salaries would be able to afford housing within the proposed development. Also, please insert a closing parenthesis to the acronym "ICSC".

Response: Page 10-11 is intended to evaluate retail demand generated by residents and workers, consistent with standard retail market analysis methodology, and is not an affordability or wage-matching analysis. Accordingly, that section focuses on household counts, population, employment levels, and expenditure capture, rather than on typical salaries by job type.

The analysis of employment characteristics, wages, and housing affordability—including the relationship between income levels and the ability of workers to afford housing within the proposed development—is provided separately in Question 24, which is specifically structured to address wage distributions, affordability thresholds, and housing need in accordance with DRI requirements.

Lastly, the closing parenthesis for "ICSC)" has been inserted as noted.

27. Page 10-17: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project

being proposed.

Response: See response to item 11., above.

28. Page 10-18: The fact that the property is designated "Agriculture" does not address the specific need for expanding the UDB. The application should acknowledge that the site is in an area that "Should be Avoided" according to Policy LU-8G.

Response: 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.[1]

[1] As for residential uses, City Park’s single family attached and detached units are sorely needed in the market, which is reflected in the projected depletion date for single-family land in 2029. Providing single family units in City Park will help the County retain the working families who would otherwise leave the County to find suitable housing.

City Park’s multifamily units will similarly add important residential supply to serve younger workers in this area of the County and will further support the appropriate functioning of the City Park community. The multifamily component is also required by the CDMP. Policy LU-8H of the CDMP requires a development that expands the UDB for residential purposes to provide a minimum residential density of 10 dwelling units per area du/ac. The minimum required density necessarily requires a multi-family component to balance the low density single family component.

The County’s projections have long recognized that demand for housing is often bifurcated into at least two principal components: single-family and multifamily. In the latest County estimates of depletion (2025 estimates), the administration estimates that the County will be able to sustain multifamily demand

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

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beyond 2040. Staff estimates, however, that single-family capacity will be depleted by 2029, less than the 10 years of demand called for in CDMP Policy LU-8G. As a result, the current UDB does not include sufficient land to accommodate the projected residential demand. The Applicant's submitted technical analysis demonstrates why multifamily and single-family demand and capacity must be considered as independent of each other and must both pass the 10 year test to be consistent with the core housing objectives of the CDMP and to ultimately be of benefit to Miami-Dade's families and economy.

The "needs" analysis required by Policy LU-8E is not mechanical in nature. There are circumstances where the County has recognized that it would be appropriate to expand the UDB to accommodate a specific set of uses even if land would remain "available" to accommodate the broader category of the use (residential, commercial, or industrial) countywide and/or in the relevant subarea.

For example, the County approved the "Beacon Lakes" and "Shoppyland" CDMP amendments in 2002, which involved expansions west of the Homestead Extension of Florida's Turnpike and north of SR 836. These applications were "approved despite the fact that the County did not project a need for more industrial land within the planning horizon." Instead, the "need determinations for these amendments" were based on the conclusion there was "need for the particular land uses proposed — warehouses and related industrial uses on large parcels to serve the Miami International Airport and the Port of Miami." *(See Department of Community Affairs, Petitioner and Karen Esty, Barry White, National Parks Conservation Association, and 1000 Friends of Florida, Inc., Intervenors v. Miami-Dade County, Respondent and David Brown and Lowe's, 2009 WL 1357407).*

The City Park application represents a similar situation twenty years following those amendments and should be reviewed in the same light. The Beacon Lakes and Shoppyland amendments filled the need for industrial land near the airport and port. This land was "needed" despite the fact that the UDB included a mathematically adequate number of acres elsewhere. The existing supply in 2002 simply did not meet the need for the particular uses. The City Park community will fill a similar need for West Kendall, creating a complete community offering jobs, housing, and recreation – a true "town center" for the West Kendall area. There are simply no areas within the existing UDB that can accommodate this combination of uses.

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.

29. Page 10-19: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur, as there is no indication of this project being proposed.

Response: See response to item 11., above.

30. Page 10-19: A comprehensive capacity analysis must demonstrate that existing infrastructure, such as water, sewer, transportation, and stormwater systems, can adequately serve the proposed development without degrading the level of service for existing communities.

Response: The Applicant has demonstrated that existing and planned infrastructure systems can adequately serve the proposed development without degrading adopted levels of service for surrounding communities. The application includes a comprehensive capacity analysis addressing water, wastewater, transportation, and stormwater, each of which was evaluated using the methodologies and level-of-service standards adopted by the applicable service providers and reviewing agencies.

With respect to water and wastewater, the analysis relied on current system capacity information and documented planned improvements identified in the adopted capital improvement programs and concluded that sufficient capacity exists to accommodate project demands within adopted level-of-service standards.

Transportation impacts were evaluated through the approved traffic impact analysis methodology, including background traffic conditions, committed development assumptions, 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.

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

Collectively, these analyses demonstrate that the proposed development can be served by existing and planned infrastructure systems in a manner that maintains adopted levels of service and avoids adverse impacts to existing communities

31. Page 10-19: Provide documentation that the application area is a 'transitional' agricultural zone.

Response: Miami-Dade County does not assign a formal designation of “transitional agricultural zone”; however, County agricultural studies and CDMP evaluations consistently recognize that agricultural lands at the urban fringe, subject to development pressure, and experiencing reduced long-term agricultural viability function differently from core agricultural preservation areas. Consistent with this framework, the application area is located outside the Urban Development Boundary (UDB) but at the edge of existing urban infrastructure and services, where agricultural lands are increasingly constrained by adjacent urban uses and less likely to remain in long-term agricultural production. In addition, the County permits residential development at a density of one dwelling unit per five acres (1 DU/5 ac) as-of-right in agricultural areas, and this low-density residential pattern is prevalent to the west and south of the subject site, further evidencing the transitional character of the surrounding land use context. Accordingly, the Study’s use of the term “transitional” is intended as a descriptive characterization, consistent with Miami-Dade County agricultural study and CDMP language, rather than an assertion of a regulatory land use designation

32. Page 10-27: Provide the list of infrastructure extensions (linear feet) and water/sewer flow. Also, see comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur, as there is no indication of this project being proposed.

Response: In regard to the CSX Portland Spur, see response to item 11., above.

33. Page 10-29: Provide specific responses to Florida Statute 163.3177(9).

Response: 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.

34. Page 10-30: Provide a list and the locations of origins and destinations available in the development, and their distances from each other, to serve as evidence that they can be accessed by pedestrians within the development to eliminate or reduce the need for use of private automobiles.

Response: The Applicant has provided additional documentation demonstrating that internal origins and destinations within the development can be accessed by pedestrians, thereby reducing reliance on private automobiles. This documentation is based on, and directly references, the concurrent CDMP amendment UDBPAD Regulating Plans, which establish the project's internal land use framework, street network, open space system, and pedestrian and bicycle connectivity.

As shown in the Regulating Plans, residential areas are distributed in close proximity to mixed-use corridors, neighborhood-serving commercial areas, civic and community facilities, parks, greens, plazas, and the central open space and water features. The Street Types Plan and Bike and Trails Route Plan illustrate a connected internal network of streets, sidewalks, multi-use paths, and trails that link these origins and destinations. The Designated Open Space Plan further demonstrates that open spaces and community amenities are intentionally interspersed throughout the development to ensure walkable

access from surrounding neighborhoods.

Together, the Regulating Plans provide a clear spatial framework showing that key internal destinations are located within walkable distances of residential areas and are connected by a continuous pedestrian and bicycle network. This integrated land use and circulation pattern supports pedestrian access within the development and provides evidence that the project is designed to reduce the need for short internal trips by private automobile.

35. Page 10-31: Explain the phrase, "coordinated with programmed capital improvements" and identify which capital improvements are currently programmed to serve this site.

Response: The phrase, "coordinated with programmed capital improvements" has been deleted.

36. Page 10-33: Application needs to use the Minor Statistical Area (MSA)-specific school and population multipliers.

Response: As discussed in Item 24 above, the application of a school multiplier (average number of children between 5 to 17 in household) should more closely reflect the County average (0.39) than the MSA (0.51) considering City Park's mix of housing type compared to the MSA and RMA. **Question 11. Revenue Generation**

37. Page 11-1: Please provide an analysis of the potential impacts that the addition of 7,800 new dwelling units and associated commercial development, over a relatively short 10-year period, may have on residential and commercial property values within the surrounding trade area.

Response: As a threshold matter, residential and commercial property values are influenced by multiple factors outside the Applicant's control (e.g., regional economic conditions, interest rates, insurance costs, construction costs, and broader housing supply trends). Accordingly, project-specific value impacts cannot be predicted with precision; however, market evidence and standard planning practice support the following conclusions.

For residential property values, the added housing supply is anticipated to increase the range of housing options and reduce upward pricing pressure associated with constrained supply. To the extent demand remains strong, new units are generally absorbed without causing measurable depreciation in surrounding neighborhoods, particularly where the project includes substantial infrastructure, parks, schools, and mobility improvements. New development of this scale may also generate localized value uplift near new amenities and improved access, while any potential downward pressure would more likely be limited to submarkets offering directly competing product types at similar price points.

For commercial property values, the introduction of new residents and employment activity increases purchasing power and customer base within the trade area, which can strengthen tenant demand, improve occupancy, and support commercial rent

performance—factors that typically support or increase commercial property values. The analysis therefore indicates that the project is more likely to expand the trade area's overall market capacity and improve viability for neighborhood-serving retail and services than to cause adverse value impacts.

38. Page 11-8: Are gas stations proposed as part of the development? Identify how many and where.

Response: No decision has been made at this time regarding the inclusion, number, or specific locations of gas stations within the development. The current application establishes a master-planned land use framework and development parameters, rather than identifying individual commercial tenants or specific site layouts.

If gas stations are proposed in the future, their number and location would be determined during subsequent site planning and permitting stages and would be required to be consistent with the approved land use plan, the applicable CDMP amendment and regulating plans, and all County, State, and local rules and regulations, including zoning, environmental, transportation, and safety requirements. Any such proposal would be subject to separate review and approval by the appropriate agencies at that time.

Question 13. Wetlands

39. Page 13-2: This question asks about proposed wetlands and not about mitigation banks. The question should be answered based on the proposed lakes, waterways, littoral plantings, etc. cited earlier, in accordance with sustainability practices.

Response: Given the lack of wetland areas within the subject property, the discussion of mitigation was intended to emphasize that the project would not require wetland creation or restoration as part of site development. Therefore, the City Park project does not include the creation of wetland areas as part of the proposed site plan. However, the conceptual greenway is an integral feature of the development that includes significant surface water areas (i.e., stormwater lakes), which will be used for drainage as well as public enjoyment for recreational purposes. The lake features will be surrounded by significant green space including littoral areas along the lake edges. It is anticipated that natural recruitment of native hydrophilic vegetation will occur along the lake edges within these littoral areas. Therefore, although no plantings are proposed, the natural colonization of the lake edges will allow for establishment of littoral habitat areas.

Considering existing site conditions are devoid of wetland areas and consist entirely of upland agricultural areas, the opportunity for site utilization by wetland-dependent wildlife is minimal, if any. The stormwater lakes and associated littoral areas will therefore provide greater opportunities for wildlife utilization compared to current site conditions. As part of the formal consultation with the USFWS, the applicant has agreed to the establishment of buffer areas (minimum of 10ft) along the lake edges to encourage wildlife utilization within these littoral areas. Site landscaping within the adjacent green space areas will also use a minimum of 40% plantings of native vegetation. The overall system along and adjacent

to the central lake features will therefore provide improved conditions for wildlife utilization relative to the existing agricultural row crop areas that are devoid of native vegetation. The proposed water systems and associated green space areas consider best management practices to encourage wildlife and native habitat, as would be consistent with local and regional sustainability practices.

Question 17. Water Supply

40. Page 17-1: The number of units in the water demand table is inconsistent with the development program.

Response: The noted inconsistencies have been resolved with this submittal. Please refer to the revised Water and Sewer Master Plan for the breakdown of the demands.

41. Table 17-1 is inconsistent with the development program.

Response: The noted inconsistencies have been resolved with this submittal. Please refer to the revised Water and Sewer Master Plan for the breakdown of the demands.

Question 18. Wastewater Management

42. Table 18-1 is inconsistent with the development program.

Response: The noted inconsistencies have been resolved with this submittal. Please refer to the revised Water and Sewer Master Plan for the breakdown of the demands.

43. The Water and Sewer table in Attachment A contains an incorrect mix of residential units.

Response: The noted inconsistencies have been resolved with this submittal. Please refer to the revised Water and Sewer Master Plan for the breakdown of the demands.

44. The attached survey is illegible and lacks bearings and distances and match lines or a key map.

Response: The figure has been revised for clarity in the revised Water and Sewer Master Plan for the breakdown of the demands.

Queston 21. Transportation

45. Table 21.A.4: Row 2 states a bike lane would be widened from 2 to 4 lanes. This appears to be a typographical error.

Response: Comment noted; the text was revised.

46. Table 21.A.4 and Table 21.A.5: Please note that Kendall Parkway – SR 836 is not to be considered for roadway mitigation.

Response: Comment noted; the Kendall Parkway was not included in the analysis.

47. Page 21-17: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed.

Response: The CSX Portland Spur is not a committed, funded, designed, or scheduled project, is not being proposed by the Applicant, and is not relied upon to address transportation impacts, concurrency, or mitigation for the Project. No project documentation, approvals, or implementation commitments exist at this time. Accordingly, references to the CSX Portland Spur project's have been removed from the transportation element.

48. Page 21-17: Provide confirmation from Miami-Dade Transit that the level of service described therein will be provided.

Response: Comment noted.

49. Page 21-18: See comments provided by TPO and DTPW, below. Details are needed to support the stated 5 percent reduction in vehicle trips.

Response:

According to US census data, the current other modes of transportation deduction is 2.2%. The other modes of transportation is expected to increase as the project is committed to providing a mobility hub (accommodating at least two MDC bus routes), and an extensive network of pedestrian pathways and bikeways to encourage walking and cycling. The network will include the following pedestrian infrastructure:

- Bike lanes - approximately 23 miles
- Bike routes – approximately 1.5 miles
- Off-street trails for pedestrians / cyclists – approximately 9 miles
- Sidewalks – approximately 24 miles

50. Table 21.B1: Regarding reduction rates, the Application needs to provide sound evidence that infrastructure will be provided and typical usage rates to support the stated rate of transit/ped usage.

Response: According to US census data, the current other modes of transportation deduction is 2.2% despite the project site being located in a mostly undeveloped area of Miami-Dade County. The other modes of transportation is expected to increase as the project is committed to providing a mobility hub (accommodating at least two MDC bus routes), and an extensive network of pedestrian pathways and bikeways to encourage

walking and cycling. The network will include the following pedestrian infrastructure:

- Bike lanes - approximately 23 miles
- Bike routes – approximately 1.5 miles
- Off-street trails for pedestrians / cyclists – approximately 9 miles
- Sidewalks – approximately 24 miles

51. Page 21-20: Similar to the request for justification of the transit/ped reduction, detailed information based on actual behavior needs to show that this internal trip reduction is realistic.

Response: As agreed upon within the agreement to delete (Section 21.G), the internalization was performed based on the rates outlined in ITE's Trip Generation Handbook, 3rd edition.

52. Page 21-40: Provide distances, methods of access to the identified existing transit stations/stops. This is for both regional and local transit.

Response: The project is proposing a mobility hub, walkable street grid (with approximately 24 miles of sidewalks), bike lanes (approximately 23 miles), and off-road pedestrian and cyclist paths (approximately 9 miles) that will tie into the nearby transportation and pedestrian network.

53. Phasing of project: The project doesn't include phasing for short term and long term. County staff need two separate analyses to verify the short term and long-term traffic impacts of the City Park project.

Response: Phasing is not required for the short term and long term analysis. Please refer to Section Q21.A of the reviewed and approved agreement to delete document for the analysis requirements.

54. The work from home trips in Table 21.B1 has been calculated incorrectly. It is assumed as 9.8% of residential trips based on the ACS data. The ACS data is only commuting trips or Home-based work trips which makes up about 22% of overall trips within Miami-Dade County, hence the work from home trips should be 9.8% of 22%.

Response: Comment noted. At the request of the reviewers and to provide a more conservative analysis the work from home deduction has been removed.

55. The internal capture for school trips in Table 21.B1 is generally not supported by ITE, and the applicant is not providing reliable data source or case studies to support this deduction of trips.

Response: The internal capture rate between school and residential uses was previously approved and is outlined to be 39.5% in Section Q21.G.4 of the agreement to delete document.

56. The traffic analysis includes only PM peak hour directional analysis. Staff require analysis of roadway conditions for two-way peak hour volumes. Additionally, roadway segment analysis should be performed for AM and PM peak hours. This is particularly crucial as roadways and intersections may exhibit capacity deficiencies in the AM peak but not during the PM peak. Analysis performed for both the AM and PM peak periods would ensure that needed mitigation treatments would not be missed.

Response: The analysis followed the requirements outlined in the approved Agreement to Delete document. The document specifies that a directional PM peak hour analysis is required. Please refer to Section Q21.B of the Agreement to Delete document.

57. The traffic volumes to be considered should be the sum of existing counts plus the approved but unbuilt project trips plus the City Park project trips. Please include the development order trips in the analyses.

Response: The traffic for the committed development obtained from MDC staff was included in the analysis.

58. The traffic study in Table 21.F.1 identifies the following offsite improvements for City Park DRI,

a. SW 136th Street from SW 167th Avenue to SW 157th Avenue; new 4 lane roadway.
b. SW 152nd Street from SW 167th Avenue to SW 157th Avenue; new 4 lane roadway.
c. SW 157th Avenue from SW 120th Street to SW 136th Street; widen from 4 lanes to 6 lanes.
d. SW 147th Avenue from SW 184th Street to SW 200th Street, widen from 2 lanes to 4 lanes
e. SW 147th Avenue from SW 248th Street to SW 264th Street; widen from 2 lanes to 4 lanes.
f. SW 200th Street from SW 147th Avenue to SW 137th Avenue; widen from 2 lanes to 4 lanes.
g. SW 184th Street from SW 157th Avenue to SW 147th Avenue; widen from 2 lanes to 4 lanes.

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

Response: Comment noted.

59. Please provide proportionate share calculations for the list of roadways that are impacted outside the project area that needs to be mitigated.

Response: Comment noted. The proportionate share calculations will be provided once the segment analysis is found sufficient.

60. Please include Mobility fee calculations in the traffic study.

Response: Comment noted. The mobility fee calculations will be provided once the traffic study is found sufficient.

61. Since this project is outside the UDB, there are not enough count stations in this location. Staff will be requiring the applicant to collect 72-hour traffic counts during the weekday for some roadway segments surrounding the project site. The list of roadway segments for which traffic counts would be required will be submitted to the applicant later after a detailed review.

Response: Seventy-two hour traffic counts were collected for the roadway segments requested by MDC staff.

62. At the railroad crossing locations, please clearly indicate the pavement markings, signings, and potential signal timing modifications to safely accommodate the train based on its expected schedule. Please share the information with CSX to get their concurrence.

Response: The project will secure the crossings with CSX.

63. As distribution of project trips were done using the SERPM8 model, please include in the appendices the input and output data.

Response: SERPM model documentation has been added to appendix 21-5.

Question 23. Hurricane Preparedness

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

Response: The Applicant will coordinate with DEM.

Furthermore, it is unclear if the future elevation "above the anticipated category three hurricane flood levels" of the roadways leading to the proposed schools, will

be in fact higher than the proposed 9.5-10' NGVD cited for residential units and presumably non-residential uses such as schools (Pages 23-4, 23-1). The elevation of roadways and non-residential, i.e. Schools, must be consistent and needs to be clarified, as to not contribute to flooding to schools from roadways.

Response: The referenced elevation range of 9.5 to 10.0 feet NGVD represents the minimum finished floor elevations for residential and non-residential buildings, including schools. Internal roadways providing access to the proposed schools will be designed to be at or above the finished floor elevations of adjacent non-residential buildings, and in all cases above anticipated Category 3 hurricane flood levels, consistent with applicable County standards and emergency access requirements.

Question 24. Housing

65. Map on Page 24-7: Provide documentation providing the basis for this map's depictions typical 20-minute travel times.

Response: The geographic area for the 20-minute peak travel time is based upon ESRI's ArcGIS Location Platform.

66. Incorrect Use of Income Thresholds: **The DRI ADA calculates the deficit of affordable housing units using HUD Income thresholds (see page 24-13). However, the ECFRPC Housing Methodology on page 2 #7 clearly states: "Please note: affordability is estimated using the actual income estimates, not the income thresholds for very low, low and moderate income."**

Response: The updated analysis includes the detailed back up of supply and demand by actual income estimates.

67. Improper Wage Increment Groupings: **The wage ranges reported in the DRI ADA (on the unnamed pages following page 24-14) for office, industrial and education sectors are presented in $1 dollar increments except for the final increments below each of the HUD income thresholds. According to the ECFRPC Housing Methodology on (page 12, Appendix D item#2), a constant increment must be used. The example provided uses $2,500, which is also stated as the maximum allowable increment. In contrast, the ADA uses variable increments of over $31,000 at the top of the moderate-income range. This skewed grouping significantly distorts the calculation of affordable housing supply by wage levels.**

Response: This has been corrected and applied to the updated Application including all supporting documentation.

68. Misapplication of the 5% Mitigation Allowance: **The Net Deficit figure of 320 units reported in the ADA (page 24-13) erroneously includes a "5% Mitigation Allowance." The ECFRPC methodology provides no basis for such an allowance. If Table 24-B.11 had been calculated correctly, the actual deficit would be 710 units representing the housing need subject to mitigation. On page 4 of the ECFRPC Housing**

Methodology, under "Estimating Need" it states: "Compare final housing supply inventory figures with the estimation of housing demand. If there is not an adequate supply of affordable housing to meet the projected demand, the DRI must mitigate this impact." The 5% figure is only used as a significance test to determine whether mitigation is required. The full section reads:

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

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

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

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

Response: The Applicant has revised the affordable housing impact analysis to ensure full consistency with the East Central Florida Regional Planning Council (ECFRPC) Housing Methodology.

Under the Methodology, the 5% figure is not an "allowance" deducted from the calculated housing need. Rather, it serves exclusively as a significance threshold test to determine whether a DRI creates a significant affordable housing impact requiring mitigation.

For Miami-Dade County, the applicable DRI residential threshold is 3,000 dwelling units. Five percent (5%) of that threshold equals 150 dwelling units. Accordingly, a significant impact exists when the project's cumulative affordable housing need exceeds 150 units (or 50 units, whichever is greater).

The demand and supply analysis determines the full affordable housing need attributable to the project. If that net deficit exceeds 150 units, the project is deemed to have a significant impact. However, the methodology does not require mitigation of the entire calculated deficit in all cases. Rather, mitigation is required to the extent necessary to reduce the project's cumulative affordable housing need to a level at or below the significance threshold.

Stated differently:

- If the calculated deficit is below 150 units, no significant impact exists and mitigation is not required.
- If the calculated deficit exceeds 150 units, a significant impact exists.
- Mitigation must be provided sufficient to reduce the net impact so that it no longer exceeds the 150-unit threshold.

The updated Application reflects this framework. The revised calculations demonstrate

that the project exceeds the 150-unit significance threshold and therefore creates a significant housing impact. The mitigation analysis has been structured to address that impact consistent with the ECFRPC methodology by reducing the net affordable housing impact to a level that is no longer significant.

Accordingly, the revised ADA properly applies the significance threshold as intended under the Methodology and does not treat the 5% test as a blanket allowance, but rather as the operative standard for determining when mitigation is required and when the impact has been sufficiently addressed.

Question 27. Education

69. ***Development Program:*** **Applicant's Table 27-1 lists 1,029 single-family (detached) units, 4,532 townhomes and 2,239 multifamily units, totaling 7,800 residential units. The residential units are listed under a "students/unit" column, listing of 0.357 for single-family; 0.249 for single-family (detached) units, and 0.156 for multi-family. No source or footnotes are provided, nor is there any explanation of how these figures came to be, i.e. statewide averages, applicant's own assumptions, etc. The rate listed in the "students/unit" column, presumably the student generation rate, falls short of the County's student generation rate for that Minor Statistical Area. There are no high/low scenarios and range of scenarios presented to account for population and/or immigration shifts and other socio-economic factors. That would be essential in determining how close to the stated student capacity for each grade level, as only one scenario is presented and thus determined the proposed schools would also be donor schools for adjacent existing public schools, as outlined in applicant's Table 27-2.**

Response: Miami-Dade County Public Schools (MDCPS) completed a Preliminary School Concurrency Analysis (School Planning Level Review) for the City Park DRI application on November 5, 2025, pursuant to applicable state statutes and the Interlocal Agreement for Public School Facility Planning in Miami-Dade County.

The original analysis evaluated the proposed 7,800 residential units based on a unit mix consisting of 1,029 single-family detached units and 6,771 multifamily units. The classification of all attached and multifamily units under a single multifamily category was the result of a scrivener's error in the unit breakdown provided for the preliminary review.

The correct residential program consists of 1,029 single-family detached units, 4,532 single-family attached (townhome) units, and 2,239 multifamily units, for a total of 7,800 dwelling units.

Accordingly, the School Concurrency Report is being revised to reflect the corrected unit distribution and to apply the appropriate MDCPS student generation rates by housing type. An updated student impact analysis will be submitted upon completion and coordination with MDCPS.

The prior MDCPS review projected that the development would generate 1,482 students and concluded that sufficient capacity currently exists at the elementary, middle, and senior high school levels when considering both Concurrency Service Area (CSA) schools

and Adjacent Service Area schools. The analysis incorporated a 33.68% impact reduction attributable to charter and magnet schools (Schools of Choice), consistent with MDCPS methodology.

The revised analysis will confirm the student generation totals and school capacity findings based on the corrected unit mix, consistent with the Interlocal Agreement requirements.

70. This Table 27-1 lists a total student population of 1,847 students, which is not consistent with the 3,041 student figure cited in Table 10 – Part III.1, and which footnote identifies as the ACS 2023, presumably the U.S. Census American Community Survey figures. The difference between the two figures cited and methodologies used to arrive at those figures must be outlined by the applicant. In addition to the lack of stated methodology, the impact of magnet and charter schools in the County is not factored in or taken into account.

Response: Please see response to item 69, above.

71. The applicant's development program, previously outlined and repeated for emphasis, consists of: 1,029 single-family (detached) units, 4,532 townhomes and 2,239 multifamily units, totaling 7,800 residential units. That analysis was not included in Exhibit 27-1, the October 1, 2025 letter by The Curtis Group sent to Miami-Dade County Public Schools (MDCPS). Instead, the proposed development program consists of: 2,100 single-family (detached) units; 2,100 townhomes, and 2,000 multifamily units, totaling 6,200 units. The applicant needs to demonstrate consistency between stated development proposal versus the "alternative" program sent to MDCPS.

Response: Please see response to item 69, above.

72. Furthermore, the applicant's stated development program is cited in Table 11-2, albeit with a timetable ranging from 51-154 single-family detached residences, built on an average yearly basis between years 2027-2036. Single-family detached residences range between 227-680 yearly, with multifamily at a range of 112-336. What is not specified is if the applicant's three proposed schools will be built out for the full capacity, or if the applicant envisions adding student stations and/or corresponding facilities on this same yearly timetable.

Response: See response to item 69., above.

73. Site Location: **In the previous review comments sent to the applicant, it was pointed out that the applicant's "Concept Land Plan" depicts locations of three schools, located in the northwest, south, and southeast portions of the application site. The applicant's "Map H Master Development Plan" still shows "School" listed in the northwest, south, and southeast portions. The CDMP Education Element Policy EDU-3A states that high schools should be located within one (1) mile inside the UDB, with middle schools located ½ mile and elementary schools at ¼ mile. The northwest, south, and southeast school sites depicted appear ±.23, ±.57, and ±1.3 miles from the proposed UDB expansion. If an elementary school is to be located in the northwest portion, it would not be in compliance with Policy EDU-3A, and may need to be reconfigured, and in coordination with MDCPS. CDMP Educational Element policies EDU-3D, EDU-3E, EDU-3F and EDU-3G contain site specific criteria**

policies such as size, compatibility and access, for MDCPS to consider when reviewing a possible school site.

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

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

Response: This comment is noted. Policy EDU-3A is a policy providing criteria where schools "should be located" which competes with, and as applied to City Park, likely conflicts with Policy LU-8H(f) requiring any development proposed in a UDB expansion to "Provide for the non-residential needs of the future residents including but not limited to shopping, schools, parks, and necessary public uses..." Given the geographic restraints of the City Park property it is not possible to both construct schools providing for the needs of future residents as required by LU-8H and satisfy the locational preferences of EDU-3A.

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

Response: The comment reflects a misunderstanding of both the nature of a-Development of Regional Impact (DRI) and the stage at which legally binding commitments are established.

A DRI is a statutorily governed development approval process under Section 380.06, Florida Statutes, through which development impacts and mitigation measures are reviewed and, where appropriate, incorporated into a Development Order adopted by the local government. The Development Order is the legally binding instrument that governs the development and sets forth enforceable conditions, phasing requirements, and mitigation obligations. Any commitments regarding the provision of public facilities—including school sites, student stations, or multipurpose facilities—are defined, quantified, and made legally binding through the Development Order and, where necessary,

implemented through subsequent recordable instruments required by that Order.

At the DRI application and ADA stage, the Applicant's obligation is to identify proposed facilities and mitigation concepts, not to execute covenants or recordable instruments. Accordingly, the absence of a recorded covenant at this stage does not represent a deficiency; rather, it reflects the proper sequencing of the DRI process.

Table 10.6 appropriately identifies "facilities to be provided by developer" as a planning-level description of capital responsibilities associated with the development program. These references are intentionally conceptual and do not function as binding legal commitments independent of the Development Order.

Similarly, the Applicant's statement in Question 23 regarding inclusion of a high school designed to serve a dual purpose as a hurricane evacuation shelter reflects the proposed development program being evaluated through the DRI process. This statement does not constitute, nor is it required to constitute, a proffer, land donation, or construction agreement at this stage of review.

Exhibit 27-1, which documents outreach to Miami-Dade County Public Schools, is informational in nature and is intended to facilitate coordination and data exchange. It is not the vehicle through which legally binding commitments are made, nor is it required to include draft conveyance documents or construction agreements.

Any obligation related to the dedication of land, construction of school facilities, or provision of student stations—if ultimately determined to be appropriate—will be clearly defined, quantified, and made enforceable through conditions of the DRI Development Order adopted by the local government. The DRI Development Order will in fact impose binding commitments on the applicant as set forth in the Development Order conditions. Only upon adoption of that Development Order would the Applicant be required to execute any implementing agreements or recordable instruments necessary to effectuate those conditions.

Accordingly, the Applicant's materials are consistent with the statutory DRI process, and the absence of a recorded covenant or binding instrument at this stage does not constitute a lack of commitment,but rather reflects the proper legal and procedural framework under which DRIs are reviewed and approved.

Question 28. Health Care

75. Page 28-1: Show a map and typical travel times to the listed hospitals.

Response: A map showing the locations of the listed hospitals and their typical drive times relative to the City Park has been included in the revised response to Question 28.

Question 29. Energy

76. No page number, section 29.E.b: Please explain why single-family dwellings are not included in the proposed commitment to use of cool roofs.

Response: The Applicant's proposed commitment to the use of cool roofs is intentionally focused on building types where roof area, configuration, and construction timing allow for

consistent, enforceable application and measurable performance outcomes. As such, the commitment was structured to apply to multi-family and non-residential buildings, which are typically developed as single construction projects under unified ownership and permitting.

A blanket commitment requiring a specific roofing material or solar reflectance standard for all single-family dwellings would be difficult to implement and enforce at the DRI level and would be more appropriately addressed through future zoning, building code, or subdivision regulations adopted by the local jurisdiction.

Importantly, the exclusion of single-family dwellings from the formal cool roof commitment does not preclude the use of reflective or energy-efficient roofing materials on those units. Single-family homes will be required to comply with the Florida Building Code and applicable energy conservation standards in effect at the time of permitting, which increasingly encourage higher roof reflectance, insulation performance, and overall building energy efficiency.

In addition, the overall City Park master plan incorporates complementary heat-mitigation strategies that directly benefit single-family neighborhoods, including extensive tree canopy, shaded streetscapes, reduced pavement widths where feasible, and integrated open space. These measures collectively reduce heat-island effects at the neighborhood scale, regardless of individual roof material selections.

Accordingly, the proposed cool roof commitment reflects a practical and enforceable approach consistent with the DRI framework, while single-family dwellings will continue to meet or exceed applicable energy and building standards and benefit from broader site-level heat-mitigation strategies.

77. No page number, section 29.i: Provide percentages of tree canopy proposed and SRI ratings (and coverage percentages) proposed for roofs and pavements.

Response: At this stage of planning, City Park's regulating plan and conceptual engineering establish the framework for a high-canopy, heat-mitigating public realm; however, final tree-canopy percentages and specific Solar Reflectance Index (SRI) selections for roofs and pavements will be confirmed during detailed landscape and civil design and through the applicable Miami-Dade County permitting processes

Question 40. Agriculture

78. "In the latest U.S. Census of Agriculture (2022), nursery and floriculture sales represented more than 83% of the county's agricultural revenue while utilizing just 19% of its farmland. By contrast, traditional row crops and other farm activity consume 83% of agricultural acreage yet account for only 19% of sales." The percentages shown for nursery and row crops acreages are incorrect. The USDA census numbers should come from Table 34 of the 2022 census.

Response: The Applicant has revised the narrative describing agricultural acreage and revenue distribution in Miami-Dade County to ensure accuracy and consistency with the 2022 U.S. Census of Agriculture. The revised analysis relies explicitly on Table 34, which reports acreage for nursery, floriculture, sod, and other intensive agricultural uses, and

distinguishes those data from other Census tables that report acreage for row crops and additional agricultural activities.[1]

Based on Table 34, nursery, greenhouse, floriculture, and sod uses in Miami-Dade County accounted for approximately 3,583 acres in 2022, representing approximately 5 percent of the county's total agricultural land base.[2] By contrast, the remaining agricultural acreage—comprised largely of traditional row crops and other extensive agricultural uses reported in other Census tables—constituted the substantial majority of farmland.

At the same time, Census sales data indicate that nursery, greenhouse, floriculture, and sod production generated more than 80 percent of total agricultural sales value in Miami-Dade County in 2022.[3] The revised narrative therefore reflects both the corrected acreage proportions derived from Table 34 and the documented concentration of agricultural revenue in high-value nursery and floriculture production.

Footnotes

1. U.S. Department of Agriculture, National Agricultural Statistics Service, *2022 Census of Agriculture – County Data, Florida*, Table 34: Floriculture and Bedding Crops, Nursery Crops, Propagative Materials Sold, Sod, Food Crops Grown Under Glass or Other Protection, and Mushroom Crops.Ibid.; total agricultural land acreage from *2022 Census of Agriculture, Miami-Dade County Profile*.
2. U.S. Department of Agriculture, National Agricultural Statistics Service, *2022 Census of Agriculture*, Market Value of Agricultural Products Sold, Miami-Dade County

79. "Notably, Miami–Dade's position in ornamental plant production—ranking first in the U.S.—and its continued expansion illustrate that nursery/floriculture is stable. However, sustaining nursery and floriculture production requires relatively modest land allocations. Of the county's roughly 13,300 acres devoted to nursery/floriculture, increased greenhouse use, and advanced production techniques can accommodate market demand with little or no additional farmland." The acreage attributed to nursery production is understated. Nursery acreage is well over 20,000 acres, increasing annually and requires more than "modest" land allocations. Greenhouses are a minor component of the nursery industry in Miami-Dade County, as the vast majority of plant production does not require controlled climate production. Greenhouses nor advanced production techniques cannot take the place of the actual physical land area needed to produce plants.

Response: Question 40 – Agriculture has been amended as follows.

Miami–Dade County's agricultural industry and profitability over the past several decades has undergone a tectonic shift from row crops which now compete with Mexico and other trade partners towards nursery and floriculture operations which continue to be protected from foreign competition given USDA restrictions on importation of soil.

In the latest U.S. Census of Agriculture (2022), nursery and floriculture sales represented

more than 83% of the county's agricultural revenue while utilizing just 26% of its farmland (Table 34). By contrast, traditional row crops and other farm activity consume 74% of agricultural acreage yet account for less than 17% of sales. This pronounced imbalance highlights the superior economic efficiency and viability of high-value nursery production, the challenges row crops face without federal protection on imports, and the fact that the County's 2022 agricultural study and plan indicates that foreign competition "*pose a dire threat*"[1] to fruit and vegetable crops and for the key fruits and vegetables historically grown in the County *"minimal profits challenge growers to remain in the industry."*[2]

City Park is being developed on farmland which has been leased to farmers who exclusively grow row crops.[3] It has never been used for nursery or floriculture growth. As a result, when proposing a 991-acre mixed-use development outside the Urban Development Boundary, it is essential to recognize that such a project would not erode the county's agricultural capacity. With approximately 68,800 acres of active farmland already in place, displacing 991 acres does not jeopardize the county's ability to maintain its agricultural output or economic thresholds, particularly when the dominant revenue generator is nursery/floriculture grown in other areas of South Dade, not the row crops which were farmed on the land upon which the project is being developed.

Notably, Miami–Dade's position in ornamental plant production—ranking first in the U.S.—and its continued expansion illustrate that nursery/floriculture is stable.

However, sustaining nursery and floriculture production requires relatively modest land allocations. Of the county's roughly 17,940 acres devoted to nursery/floriculture, increased greenhouse use, and advanced production techniques can accommodate market demand with little or no additional farmland. Acreage devoted to nursery/floriculture only grew by 460 acres between 2017 and 2022 or an average annual increase of only 0.53%. While nursery and floriculture have thrived in the past, the County's own agricultural report indicates that future demand for new nurseries and floriculture will be limited given increased competition from other states: *"The nursery/floriculture industry, the dominant agricultural sector in Miami-Dade County, has been the most rapidly growing major segment of U.S. agriculture for the past 30 years, but is now considered a mature industry with slower growth rates likely in the future"*[4] Indeed, the University of Florida report indicates that demand for farmland overall is expected to decrease over the next several decades from 68,837 acres in 2022 to 56,284 acres in 2050 or a reduction of more than 12,000 acres. Compared to the 68,837 acres used for agriculture in the 2022 Census, by 2030 alone, the mean projected demand for agricultural land in Miami-Dade County will decline by more than 4,000 acres and another 4,000 +/- by 2040 according to the county's own report.[5] In this context, a 1,000-acre development—even sited outside the UDB—can proceed without any impact on the county's agricultural economy.

In summary, the county's agriculture future lies in embracing nursery and floriculture as its dominant agricultural engine. A mixed-use project of the size proposed—carefully sited and planned—will not erode Miami–Dade's agricultural capacity. On the contrary, by facilitating strategic land-use shifts toward high-value agriculture, the development can preserve both economic vitality and farmland integrity.

[1] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. ES-3
[2] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. 23

[3] Indeed, the reason why the development land is currently leased and farmed is because the owners are able to benefit from the ad valorem exemption associated with agricultural land and despite an expectation and attempt at making a profit from farming, the land has failed to generate any profit for the owners.
[4] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; p. 29
[5] University of Florida Evaluation of Agricultural Land Use Trends and Outlook in Miami-Dade County; Mean of 5 mid-range projections Table 20.8 p. 225

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

Question 23. Hurricane Preparedness

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

Response: See Response to item 83., below.

81. Storm Surge Planning Zone D: City Park (new development/no existing occupants): 20,826 additional persons, based on Applicant's stated population projection. TOTAL Increase in potential additional evacuees = 1,042 people

Response: See Response to item 83., below.

82. As per the 2024 ESRI Census, the population in Storm Surge Planning Zone D is 642,282 plus the above *increase in population of 20,836 to 22,296* will increase the total population from 663,108 to 664,669 individuals which is approximately a 3.1% to 3.4% increase in population for Storm Surge Planning Zone D. Therefore, DEM considers the potential for 5% of the *20,836 to* 22,296 increases in population to evacuate which equals 1,041 to 1,114 additional evacuees, which poses an impact to the County that would require opening 1-2 additional evacuation centers.

Response: See Response to item 83., below.

83. These calculations are based on the information provided for the new construction project. If projections for the new construction changes, e.g., the population increases or decreases, the assessment becomes invalid.

Response: The Applicant agrees with the County Department of Emergency Management (DEM) analysis and its conclusions regarding hurricane evacuation impacts associated with the proposed development.

Specifically, for Storm Surge Planning Zone D, City Park is classified as new development with no existing occupants and is projected to add 22,296 persons, based on the County population multiplier applicable to the site's Minor Statistical Area. Consistent with the DEM analysis, this results in a total increase in potential additional evacuees of

approximately 1,114 persons.

As documented by the 2024 ESRI Census, the existing population within Storm Surge Planning Zone D is 642,282 persons. With the addition of City Park's projected population increase of approximately 20,836 to 22,296 persons, the total population within Zone D would increase to approximately 663,108 to 664,669 persons, representing an overall increase of approximately 3.1 to 3.4 percent. Based on this increase, DEM appropriately assumes that approximately five percent (5%) of the additional population would seek public shelter during a storm event, resulting in an estimated 1,041 to 1,114 additional evacuees. DEM concludes that accommodating this increase would require the opening of one to two additional evacuation centers.

In response, the Applicant commits to providing the necessary additional public shelter capacity through the planned on-site high school, which is designed to function as a hurricane evacuation shelter. This facility will provide sufficient shelter spaces to fully offset the projected increase in evacuees attributable to the Project, ensuring that City Park will not adversely impact Countywide shelter capacity and will remain consistent with DEM planning assumptions and requirements.

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

84. Please provide clarification on transit and multimodal connectivity and improvements related to the CSX Portland Spur, the extension of bus routes and the surrounding bicycle and pedestrian connectivity. Please note that the CSX Portland Spur corridor is not a part of the SMART Program.

Response: As the CSX Portland Spur corridor is not a committed, funded, designed, or scheduled project, and is not being proposed by the Applicant, references to the CSX Portland Spur project have been removed from the transportation element.

85. Please provide clarification on the timeline for the transit and multimodal improvements such as the proposed transit hub, transit routes, railway and bike lane improvements.

Response: The items listed above will be implemented within the 10-year development phase.

86. Please provide evidence to support a 9.8% work from home reduction. It is important to note that this metric is fluid and can easily change depending on policy and environment.

Response: The work from home reduction was based on the latest US census data and only applied to residential land uses. The Census showed that "work-from-home" is an actually occurring as 9.8 % of residents in the area work from home, reducing the traffic

impacts of residences. Although the employees working from home may fluctuate, the Census data for the area shows that the percentage of people working from home has consistently increased over the last 10 years. At the request of reviewing agencies and for a more conservative analysis, the work from home reduction has been removed from the residential uses.

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

Traffic Engineering Division

Question 21. Transportation

87. **For the overall traffic study: The assumptions to obtain the traffic volumes/percentages provided in all the tables within the traffic study cannot be verified, as the supporting data and calculations used to derive these values are not provided. Please include the source data, count dates, and any adjustment factors or methodologies applied to allow DTPW to backtrack and confirm the traffic volumes/percentages provided in the analysis.**

Response: The assumptions has been added to the tables. Supporting documentation is available in the Appendix.

88. **Section A (5) (Existing Traffic Conditions): The study states "Additional segment volume data was obtained from a cloud-based traffic analytics application". Please provide details on the cloud-based traffic analytics application used to obtain segment volume data.**

Response: Seventy-two-hour traffic counts have been collected for the roadway segments at these locations.

89. **Section B (Trip Generation):**
    a. **The trip generation assumes a 9.8% reduction due to employees working from home; however, this adjustment does not fall under best practices, as telecommuting conditions are subject to change in the future and variable with fluctuations in work patterns before, during and after COVID-19.**

Response: The work from home reduction was based on the latest US census data and only applied to residential land uses. The Census showed that "work-from-home" is an actually occurring as 9.8 % of residents in the area work from home, reducing the traffic impacts of residences. Although the employees working from home may fluctuate, the Census data for the area shows that the percentage of people working from home has consistently increased over the last 10 years. At the request of reviewing agencies and for a more conservative analysis, the work from home reduction has been removed from the residential uses.

b. Please clarify how the 5% deduction was obtained as it does not coincide with the census 3.7% reduction.

Response: The existing 2.2% other modes of transportation is expected to increase as the project expands accessibility to other modes of transportation and provides pedestrian generators for the existing nearby communities. The project is committed to providing a mobility hub (accommodating a minimum of two express MDC bus routes) that will connect to the existing nearby communities, and an extensive network of pedestrian pathways and bikeways to encourage walking and cycling. The network will include the following pedestrian infrastructure:

- Bike lanes - approximately 23 miles
- Bike routes – approximately 1.5 miles
- Off-street trails for pedestrians / cyclists – approximately 9 miles
- Sidewalks – approximately 24 miles

Therefore a 5% reduction for other modes of transportation is conservative.

c. Please provide clarification on the Land Use Equivalency Matrix.

Response: The land use equivalency matrix will be provided once the traffic study is found sufficient

d. Table 21.B1 shows that a 3.2% internal capture rate was used between schools-residential; however, item 4 states that internal capture between schools & residential is 39.5%. Please clarify.

Response: The 39.5% rate was used to calculate the internalization between the residential and school trips. The 3.2% represents the rate that the school trips internalize compared to the trips for all uses. The table has been updated to reflect the 39.5%.

e. Please note that the proposed 39.5% internal capture rate will be contingent upon site plan review. As per the trip generation handbook section 6.5.1, Development Size: the data that forms the bases for the internal capture methodology are from mixed-use development sites that have between 100,000 and 2 million sq. ft. of building space and an overall acreage of up to roughly 300 acres. The mixed-use development should fall within those ranges. It can be a single site, a block, or a district or neighborhood (with multiple interconnected or interactive blocks within a defined boundary); however, this procedure should not be used for a development composed of different adjacent, but not directly connected, land uses. Adjacent blocks can be directly connected if there is an internal street, driveway, alley system, or pedestrian way by which person trips can be made to travel from one block to another. If the development site has multiple land uses and the blocks are configured in such a way that internal trips must exit the site and use an external street system, then the site is not a mixed-use development.

Response: Comment noted. However, the internal capture rate between school and

residential uses was previously approved and is outlined to be 39.5% in Section Q21.G.4 of the Agreement to Delete document.

f. Services that are envisioned for the transit hub are not provided.

Response: The transit Hub is expected to serve a minimum of two express MDC bus routes that will connect to the existing nearby communities.

g. Provide back up documentation that justifies 5.0 transit and pedestrian trip shares. Current best practices for this area of the County are 1-3 %

Response: The existing 2.2% other modes of transportation is expected to increase as the project expands accessibility to other modes of transportation and provides pedestrian generators for the existing nearby communities. The project is committed to providing a mobility hub (accommodating a minimum of two express MDC bus routes) that will connect to the existing nearby communities, and an extensive network of pedestrian pathways and bikeways to encourage walking and cycling. The network will include the following pedestrian infrastructure:

- Bike lanes - approximately 23 miles
- Bike routes – approximately 1.5 miles
- Off-street trails for pedestrians / cyclists – approximately 9 miles
- Sidewalks – approximately 24 miles

Therefore a 5% reduction for other modes of transportation is conservative.

90. Appendix 21-2: Please provide the D-factor for the MDC traffic counts.

Response: D-factor information has been provided in the Appendix. As verified by MDC staff, no D-factors are available for the data on the MDC concurrency tables. As no D-factors are available, the D factor of a nearby parallel roadway was used to analyzed the MDC segment counts.

91. Section D (Background Traffic Growth Rate): Please clarify the rationale for applying a lower growth rate (0.7%) to roadway segments closer to the subject site compared to the higher rate (1.4%) applied to segments farther away. Additionally, please clarify which agency approved the use of these percentages.

Response: The growth rates used for the roadway analysis were previously approved and are outlined in the Agreement to Delete document. Please refer to Sections Q21.F and Q21.H.2.

92. Appendix 21-5 (SERPM Documentation): The SERPM model output provided lacks sufficient details. If possible, please include more details to better explain how the growth rate percentages were derived.

Response: The growth rates used for the roadway analysis were previously approved and are outlined in the Agreement to Delete document. Please refer to Sections Q21.F and

Q21.H.2 of the agreement.

93. Section D (Background Traffic Growth Rate): The traffic study states that "committed developments are considered to be all approved developments anticipated to generate more than 400 peak hour trips." Please clarify this statement, as per the MDC Traffic Engineering Division standard methodology, any development generating more than 100 peak hour trips must be considered a committed development.

Response: Response: Comment noted; the traffic for the committed development(s) obtained from MDC staff were included in the analysis.

94. The report states "Pursuant to Chapter 163.3180, F.S., roadway segments that operate below the adopted level of service standard are deemed to be "transportation deficient." In accordance with Chapter 163.3180, F.S., the improvement necessary to correct the transportation deficiency is the funding responsibility of the entity that has maintenance responsibility for that facility. The project is not responsible to help improve or eliminate existing deficiencies". Please note that we respectfully disagree on interpretation. If any road determined to be transportation deficient without the project traffic under review, the costs of correcting that deficiency shall be removed from the project's proportionate-share calculations and the necessary transportation improvements to correct that deficiency shall be in place for purposes of the proportionate-share calculation. Although, the improvements necessary to correct the transportation deficiency is the funding responsibility of the entity that has maintenance responsibility for the facility, the development's proportionate share shall be calculated to mitigate the impacts to at least background conditions.

Response: Comment noted. The proportionate share calculations will be provided once the traffic study is found sufficient.

95. Section E (1) (Project Distribution): Please provide a clearer representation of the trip distribution shown on Map J-E1. Also, please verify the accuracy of the percentages, as some of the values appear to be incorrect.

Response: The exhibit was reviewed and revised.

96. Section G (Table 21.G.1 – Roadway Sections Providing Site Access): Please note that the applicant will be responsible for constructing the roadway improvements listed in the table below, in addition to those identified in Table 21.G.1.

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

SW 144 Street	**SW 177 Avenue and SW 162 Avenue**	**Minimum of 70’ of ROW**

Response: Comment noted.

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

Response: A standard traffic impact study is not required at this stage. The analysis follows the methodology outlined in the Agreement to Delete document that was approved for the DRI study.

98. If you have any questions concerning the comments, or wish to discuss this matter further, please contact Anamersy Arce at Anamersy.Arce@miamidade.gov.

Response: Comment noted.

Transportation Planning and Policy Division

Question 21 - Transportation

99. Section B - Trip Generation: NOT Sufficient- Needs more information. Trip generation rates and assumptions (ITE 11th Edition) are not clearly shown. Internal capture and multimodal reductions are not quantified and justified with Census data and site context. Missing Information:

a. Include explicit modal split percentages and persons-per-vehicle assumption, as the question requires them and they are not clearly presented.

Response: Comment noted. More information is provided for the trip generation rates and assumptions in Appendix 21-4. The internal capture rate between school and residential uses was previously approved and is outlined to be 39.5% in Section Q21.G.4 of the agreement to delete document.

100. Section F - Highway Network Modifications: NOT Sufficient- Needs more information. Table 21.F.1 identifies roadway segments with deficiencies and describes responsibility per statute. However, the response is not clear on which improvements are DRI-triggered (Can assume it is the last set of improvements listed, but it is not clear) or the timing of such improvements, as required by the question. Missing Information:

a. Clarify which improvements will be implemented by the developer.

Response: Comment noted.

b. State when DRI-related improvements are required

Response: Comment noted.

c. Describe any TSM or mitigation strategies beyond LOS analysis.

Response: Comment noted.

101. Section G Access Points: NOT Sufficient- Needs more information.

Response: Comment noted.

102. Map J-G1 and Table 21.G.1 are NOT sufficient. The applicant must identify roadway sections and ROW dedication commitments. Missing Information:

a. The question asks how the access plan will minimize impacts and preserve traffic flow. The response lists design standards but lacks a narrative explanation of how access management will achieve this need to add an explanation of impact mitigation measures (e.g., median control, shared access, turn lane design, signal coordination).

Response: Comment noted.

b. The applicant must review with the County Traffic Engineer County Section line roads and County half section line roads

Response: Comment noted.

103. Section H Corridor Protection: NOT Sufficient Incomplete. The text explicitly states: "The response to Section H will be provided once the segment analysis is found sufficient." Missing Information:

a. Need to develop the response for Section H:
b. Identify any designated transportation corridors in MDC's Comprehensive Plan.
c. Explain how the project supports protection or enhancement of those corridors.
d. Specify right-of-way dedications, setbacks, or interlocal agreements proposed.

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

104. Section I Multimodal Provisions / Non-Auto Travel: – NOT Sufficient. Sections 1–4 describe regional transit connectivity, pedestrian/cyclist infrastructure, and TDM strategies (ridesharing, vanpools, transit incentives, etc.).

a. Access to regional transit is not sufficient – The Kendall corridor of the SMART Plan is more than 3 miles south [sic north] of the city park DRI site. While it will provide regional transit service at a future date, the project is currently under development by FDOT and does not have an estimated implementation date. There are currently no plans to create transit service along the Portland rail spur. This connection will still require vehicular trips to move access regional transit

Response: Comment noted. The project will coordinate with MDC Transit.

b. Access to local transit. Not sufficient – while metrobus route 152 provides service in the general vicinity, it does not provide the required 20-minute headways. While the County is capable of extending this route to the new community, the fiscal impact for new buses needed and operations and

maintenance must be addressed by the development prior to the County deeming the application sufficient

Response: Comment noted. The project will coordinate with MDC Transit.

c. The applicants' agreement to promote TDM is not sufficient in addressing how this will be implemented. It is unclear what the benefits of promoting staggered work schedules, flex time, WFH, rideshare incentives will be. Nor is an actual program established by the county to keep track and monitor such programs.

Response: In addition to these TDM measures, the project is also incorporating bike lanes, pedestrian connectivity to communal spaces and the implementation of a transit hub and expanding transit to the area to incentivize the use of alternative transit. Appropriate TDM measures will be included in the development conditions.

d. Public Transit Service Improvements stated here are not feasible as there is no proposed Premium Transit rail station.

Response: A rail station is not being proposed. However, a transit hub for buses (including two express buses) is included within the project.

e. Public Transit Infrastructure Improvements. The information needed for the construction of on-site transit shelters, amenities, stops, drop-off locations or pull-outbays and patron parking to serve the transit stops and stations gas not been provided to DTPW

Response: Information about the construction of on-site transit shelters, amenities, stops, drop-off locations or pull-out-bays and patron parking is not part of the DRI.

f. Public Transit Incentives: It is unclear how this measure will provide benefit to the occupants of the project as they may not be employed within the city park DRI area.

Response: As the DRI contains mixed uses (including commercial and office uses), it will provide job opportunities for employees that may benefit from the transit incentives.

g. Informational Kiosks: These kiosks should be located near the transit terminal and areas of high density residential and commercial units.

Response: Comment noted.