

SOUTH FLORIDA REGIONAL PLANNING COUNCIL

Question 5. Legal Description

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

Response: This comment is acknowledged.

Question 10. General Project Description

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

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

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

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

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

UDB. The following is a description of the three categories of land recognized in Policy LU-8G and the City Park application's compliance with the Policy.

Land that Shall Not be Considered

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

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

Land that Shall Be Avoided

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

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

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

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

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

Land that should Be Given Priority for Inclusion

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

First, City Park is located in the Planning Tier with the earliest projected depletion of any area in the County. Based on the County's estimates, the area (West South-Central Tier) in which City Park is located will run out of developable residential land (both single- and multi-family) in 2027 making the City Park area a priority for inclusion in the UDB

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

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

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

Application of Balancing Test to City Park

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

Consistency with CDMP Policy LU-8F

Urban Development Boundary Capacity and Adequacy of Land Supply

Policy LU-8F of the Miami-Dade County Comprehensive Development Master Plan (CDMP) provides that the Urban Development Boundary (UDB) should contain sufficient developable land to accommodate at least ten (10) years of projected countywide residential demand, including development and redevelopment at recommended densities around transit stations, and that the adequacy of non-residential land supplies be

evaluated based on the appropriate geographic scale, including countywide supply, Tiers and Half-Tiers, Minor Statistical Areas (MSAs), Census Tracts, or combinations thereof, depending on the type of use.

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

Residential Land Supply and 10-Year Planning Horizon

The Needs Assessment demonstrates that while Miami-Dade County retains long-term capacity for multifamily housing, the County faces a near-term deficiency in land capable of accommodating single-family detached and attached (townhome) housing, which is a critical component of countywide residential demand.¹

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

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 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 "Shopyland" 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."⁹

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 Shopyland 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.

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

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

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

The “needs” analysis required by Policies LU-8E and LU-8F is not mechanical in nature. There are circumstances where Miami-Dade 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 “Shopyland” 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.”

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center” for the West Kendall area. There are simply no areas within the existing UDB that can accommodate this combination of uses.

Housing Mix and Density Considerations

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

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

Industrial Land Supply – Tier-Based Analysis

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

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

City Park proposes approximately 73 acres of contiguous industrial land, representing a modest but necessary addition to industrial land supply within a Tier that is projected to reach depletion within the Policy LU-8F planning horizon. The provision of industrial land at City Park is therefore consistent with LU-8F’s Tier-based adequacy evaluation and supports continued economic activity and employment growth in this part of the County.

Commercial and Office Uses – Subarea-Based Adequacy

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

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

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

Conclusion

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

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

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

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

Response: This response is presented below in two parts – 1) Table 10-E.1 – Existing Demographic Conditions, and 2) Table 10-E.2 – Population Projections.

Table 10-E.1 – Existing Demographic Conditions

The existing population and demographic data presented in Table 10-E.1 are based on the 2023 American Community Survey (ACS) 5-Year Estimates, which represent the most current and authoritative demographic dataset available at the Census Block Group level, the geographic scale necessary to accurately characterize existing conditions within the City Park Regional Mobility Area (RMA). More recent ACS releases (e.g., 2024) have not yet been finalized or published at the block group geography and, therefore, cannot be reliably applied to this analysis. As such, the 2023 ACS data reflect the best available and most up-to-date information for existing population conditions and are appropriate for use in this application.

Table 10-E.2 – Population Projections

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

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

Additionally, as noted by RER staff, Countywide land capacity analyses indicate that there is effectively no single family or townhome residential land capacity beyond approximately 2029 within the South Central Tier (with zero land capacity of any residential development west of the Turnpike by 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.

- 4. Premature Development (Page 10-31): The following application does not sufficiently address how the proposed development is not a premature expansion of the Urban Development Boundary. The Applicant states housing is available**

within the surrounding neighborhoods through 2029. However, there is available land within the Urban Development Boundary to support population growth through 2040. The applicant needs to provide further details on how this development is not premature and supports Miami-Dade County's efforts for balanced growth.

Response: The proposed City Park development is not a premature expansion of the Urban Development Boundary and is consistent with Miami-Dade County's balanced growth objectives, as demonstrated in the City Park Needs Assessment (August 2025) submitted as part of the CDMP amendment package.

While the County's aggregate housing capacity analysis indicates that total residential capacity within the UDB may extend beyond 2040, the Needs Assessment establishes that capacity is not evenly distributed by housing type, geography, or market feasibility, and that these distinctions are critical when evaluating prematurity under the CDMP.

Residential	Land	Supply
<p>The Needs Assessment documents that Miami-Dade County's remaining land supply capable of accommodating single-family detached and attached (townhome) housing is projected to be depleted by approximately 2029, which is less than the ten-year planning horizon required under CDMP Policy LU-8F. Although multifamily capacity may remain beyond 2040, the County's own data show that single-family and townhome land supply represents less than five percent of the existing housing stock and is already functionally constrained by ownership, environmental, and market limitations. Treating all residential capacity as interchangeable masks this near-term deficiency and does not reflect actual development conditions.</p>		

The County's permitting trends further confirm this effective depletion, with single-family and townhome construction significantly lagging projected demand despite continued population growth. As a result, the existing UDB cannot adequately accommodate projected residential demand for housing types preferred by working families and households with children, leading to sustained domestic out-migration and workforce displacement.

Balanced Growth and Housing Mix

City Park supports balanced growth by providing a mixed-density residential program of approximately 7,800 units, including both single-family and multifamily housing. This mix of uses is necessary to satisfy CDMP Policy LU-8H requirements to achieve a minimum density of 10 dwelling units per acre, and is consistent with County policy objectives that seek to accommodate growth across multiple housing types rather than concentrating future development exclusively in higher-density urban core locations. The project supplements—not supplants—existing multifamily capacity by addressing a documented shortage in lower-density housing that cannot be feasibly met within the remaining UDB.

Employment and Non-Residential Uses.

Balanced growth under the CDMP is not limited to residential capacity. The Needs Assessment demonstrates that industrial land in the South-Central Tier is projected to be depleted by approximately 2033, well within the Policy LU-8F planning horizon, and that remaining parcels are largely unsuitable for modern industrial uses. City Park provides approximately 73 acres of contiguous industrial land, addressing a Tier-specific deficiency and supporting job growth proximate to new housing. This addition of commercial and industrial uses is necessary to satisfy CDMP Policy LU-8H requirements relating to the Jobs to Housing Ratio.

Similarly, the assessment shows that commercial and office land within Census Tract 196 and MSA 6.2 is functionally constrained, with vacancy rates below two percent and insufficient vacant land to accommodate demand generated by projected population and employment growth. By internalizing retail and office uses, City Park reduces external vehicle trips and supports a jobs-to-housing balance consistent with County planning objectives.

Conclusion

City Park is not a premature UDB expansion because it responds to documented, near-term deficiencies in specific land use categories—particularly single-family housing and Tier-based industrial land—that will be exhausted well before 2040. The project advances Miami-Dade County’s balanced growth strategy by aligning housing, employment, and services within a master-planned community, rather than relying on theoretical countywide capacity that is not market-viable or geographically appropriate. Accordingly, the proposed development satisfies CDMP policies governing timing, adequacy of land supply, and balanced growth.

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

Response: The Impact Summary on Page 10-35 addresses the public facilities necessary to support the proposed City Park development; however, the detailed capital costs associated with specific infrastructure and transportation improvements are still being refined through the ongoing interagency review and concurrency evaluation process. As is typical for large-scale, master-planned Developments of Regional Impact, the precise scope, timing, and cost of individual improvements will be finalized through subsequent phases of County, state, and agency coordination.

Notwithstanding the ongoing refinement of cost estimates, City Park is located in an area where public infrastructure and services can be readily and efficiently extended, consistent with long-range County planning assumptions. Importantly, the Applicant is not relying on County capital resources to construct new infrastructure. As a fundamental condition of

DRI approval, the Applicant commits to designing, constructing, and funding all on-site and proportionate off-site infrastructure improvements required to support the development, including transportation improvements, utilities, drainage, and other public facilities, at the Applicant's sole expense.

Transportation improvements required to mitigate project impacts will be identified through coordination with Miami-Dade County, FDOT, and other applicable agencies and will be implemented in accordance with adopted level-of-service standards and concurrency requirements. These improvements will be developer-funded and phased to align with development intensity and timing, thereby avoiding the diversion of County resources from existing, programmed, or planned capital projects, and helping to satisfy The CDMP Policy LU-8H requirement that the project have a net positive impact to Miami-Dade county.

Accordingly, the proposed development does not necessitate the reallocation of County capital funding, nor does it impose an unfunded fiscal burden on Miami-Dade County. Instead, City Park advances County growth-management objectives by internalizing the cost of infrastructure provision while ensuring that public facilities are delivered in a timely, coordinated manner to support the proposed development program.

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

Response: The Applicant has coordinated and will continue to coordinate with the Miami-Dade Department of Transportation and Public Works (DTPW), the Miami-Dade Transportation Planning Organization (TPO), Florida Department of Transportation (FDOT), and Greater Miami Expressway Authority throughout the DRI review process.

The City Park transportation framework is intentionally designed to be multimodal and transit-ready. The Project does not rely on the implementation, expansion, or funding of unprogrammed County transit services to satisfy baseline transportation concurrency. However, should the Applicant elect to pursue the County's Transit Center Concurrency Exemption, it is anticipated that two existing County bus routes may need to be extended to directly serve the Project. The Applicant will coordinate with the Miami-Dade County Department of Transportation and Public Works (DTPW) to evaluate the feasibility, timing, and funding mechanisms for such extensions, consistent with applicable County policies and transit service planning processes

Transportation Facilities and Service Assumptions

The City Park DRI does not assume, require, or depend upon the extension of SMART Plan rapid transit corridors, Metrobus service, commuter rail, or other fixed-route transit to accommodate project-generated travel demand. References in the ADA to future transit

are provided solely for long-range planning context and land-use compatibility, and do not constitute a project commitment, mitigation measure, or prerequisite for development approval.

Accordingly, the proposed development does not generate fiscal impacts to Miami-Dade County associated with unprogrammed transit expansion, nor does it divert resources from, delay, or compete with the implementation of existing, programmed, or planned SMART Plan corridors.

CSX Corridor Clarification

The ADA does not propose the use of the CSX rail corridor for commuter rail service, nor does it assume that CSX would serve the daily commuting needs of City Park residents. References to the CSX Portland Spur are limited to its identification as a potential future regional corridor and as a locational consideration for a Transit-Oriented Development (TOD) node that is compatible with possible future transit investments, should such investments be advanced by the appropriate public agencies.

Any future passenger rail service within the CSX corridor would be a separate, County- or regionally-led initiative, subject to independent feasibility analysis, agency sponsorship, funding availability, and agreements with CSX. Such service is not included in, required by, or relied upon by the City Park DRI.

Consistent with existing County understanding, the CSX corridor currently functions primarily to support freight and industrial operations, and the City Park DRI does not rely on that corridor to alleviate residential transportation demand.

Fiscal and Planning Implications

The City Park DRI does not rely on the implementation or expansion of unprogrammed County transit services to satisfy baseline transportation concurrency requirements. Accordingly, County transportation resources remain prioritized for existing, programmed, and planned projects, including SMART Plan initiatives. Transportation impacts associated with City Park will be addressed through developer-funded roadway improvements, operational enhancements, and Transportation Systems Management (TSM) measures, coordinated with DTPW, FDOT, and other applicable agencies and phased with development.

Ongoing Intergovernmental Coordination

The Applicant will continue to coordinate with DTPW, the TPO, FDOT, and other relevant agencies through the concurrency review, traffic impact analysis, and subsequent permitting processes to ensure that transportation improvements are appropriately scoped, funded, and implemented without creating unfunded obligations for Miami-Dade County.

Question 11. Revenue Generation

7. Direct contradiction about estimating sales tax revenues

What the text does:

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

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

Response: The comment correctly identifies an internal inconsistency in the text regarding the treatment of sales tax revenues. Sales and other tax revenues are, in fact, estimated and quantified in Table 11-1, and those estimates are derived using the IMPLAN economic impact model, informed by assumed average retail sales per square foot. Accordingly, the separate narrative subheading stating that sales tax revenues cannot be estimated due to insufficient information is erroneous and should not have been included.

The intent of the analysis is that sales and other tax revenues associated with City Park operations are estimated, and those estimates are reflected in Table 11-1 and in the accompanying narrative discussion describing the use of IMPLAN and retail sales assumptions. The conflicting "Sales Tax" subheading near the end of the section will therefore be deleted in its entirety to eliminate any ambiguity or contradiction.

In addition, the fiscal analysis is being updated by the Applicant to reflect a 75,251 square foot reduction of the retail program from 749,153 to 673,902 square feet, and the sales and other tax estimates in Table 11-1 will be correspondingly refined to ensure internal consistency between the table and the narrative.

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

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

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

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

Response: The Applicant has prepared the estimates and included them in the revised response to this Question.

9. Inconsistent description of the analysis period start year

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

Response: The comment correctly identifies a discrepancy between the narrative description of the analysis period and the annual tables. The fiscal and revenue analysis is based on a 10-year build-out period extending from 2027 through 2036, which is the timeframe reflected in Table 11-1 and Table 11-2. Revenue generation is therefore assumed to begin in 2027, not 2026.

The reference in the narrative to a 2026–2036 analysis period is a drafting error and does not reflect the assumptions used in the underlying fiscal model. The narrative will be revised to consistently state a 2027–2036 analysis period, aligning it with the tables and the build-out assumptions.

The Applicant has updated the narrative text accordingly to ensure full internal consistency. No change to the methodology, revenue assumptions, or conclusions of the fiscal analysis is required

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

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

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

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

Response: See response to item 7., above

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

Question 11 instructions ask for projections of:

- **occupational license revenues**

- **hotel and restaurant taxes**
- **gasoline taxes**
- **water and sewer charges**
- **and any other reasonably connected sources**

In the narrative:

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

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

Response: The comment correctly identifies that portions of the narrative contain residual template language stating that certain revenue categories cannot be estimated, which is inconsistent with the analytic framework used elsewhere in Question 11. The intent of the fiscal analysis is to provide an estimate for all revenue sources reasonably connected to the proposed development, consistent with the instructions for Question 11 and with the use of IMPLAN and other standard planning assumptions.

The Applicant will prepare estimates for the following revenue categories:

- Occupational license revenues
- Retail/commercial use taxes
- Gasoline tax revenues
- Ongoing water and sewer user charges

These estimates are included in the revised response to Question 11.

These estimates will be developed using reasonable, industry-standard assumptions, proportional allocation methods, and IMPLAN-based or comparable multipliers, as appropriate for a master-planned project at this stage of planning.

Given the early conceptual nature of the development program—prior to tenant mix, tenant build-out characteristics, operating characteristics, or utility demand profiles—each estimate has been accompanied by explicit caveats describing the inherent uncertainty and limitations of precision at this stage. The purpose of the analysis is not to establish exact revenues, but rather to provide a consistent, well-reasoned estimate for comparative and planning purposes.

Question 13. Wetlands

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

Response: The City Park project does not propose the creation of wetland areas as part of site development. However, the conceptual greenway is an integral feature of the site plan that includes significant surface water areas (i.e., stormwater lakes) that 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.

Questions 14. Water and 15. Soils

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

provided additional detail on the analysis needs and further steps in the attachments.

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.

Question 17. Water Supply

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

Response: The total number of units was revised in the Water and Sewer Master Plan for consistency across the application.

Question 18. Wastewater Management

- 15. 18-C (18-1 or 156): The Miami-Dade County Water and Sewer Department has not determined that there is capacity within existing facilities to accommodate this development. The SFRPC cannot determine the impact of the proposed development without potable water and sewer capacity information.**

Response: The development program has been revised in the Water and Sewer Master Plan and the applicant has submitted a Letter of Availability request to Miami-Dade County Water and Sewer Department (MDWASD) to determine the available capacity. The results of the MDWASD will be shared upon receipt.

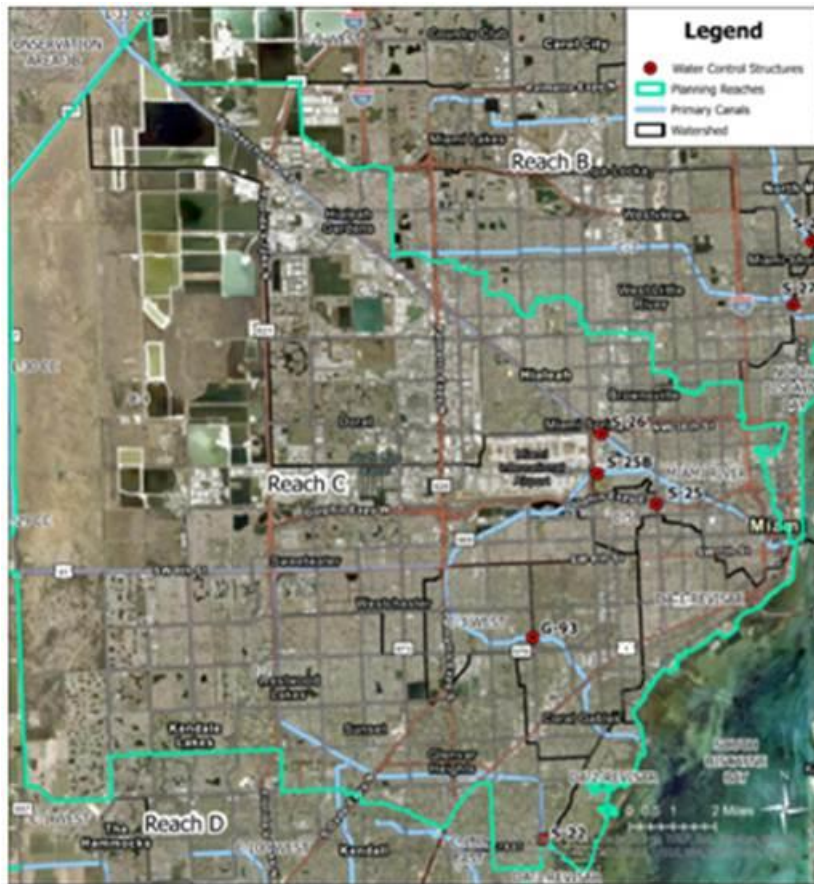
Question 19. Stormwater Management

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

Response: The proposed development of the City Park project site would not result in any inconsistency or nonconformity with the current stormwater management activities of the Comprehensive Everglades Restoration Plan (CERP) or any related projects and studies. The Central and Southern Florida (C&SF) Flood Resiliency Study originally consisted of four planning reaches (A-D) from Palm Beach County south to Miami Dade County. The City Park project site occurs within the limits of Reach D (see Figure 19-1) consisting of the South Miami Basins. There are no current planning initiatives for Reach D. In Reach C, the SFWMD and USACE will continue to partner on the ongoing C&SF Flood Resiliency Study (Section 216), which will focus on advancing the feasibility and engineering studies

for four coastal structures within Reach C, in Miami Dade County, aiming for inclusion in WRDA28. The City Park site is approximately three miles south of Reach C (Miami River Basins) and focuses on the advancement of the feasibility and engineering studies for four coastal structures. The study area includes five watershed basins and the associated network of five primary canals. The goal is to improve the functionality and capacity of the existing coastal water control structures of these primary canals to reduce flood risks and enhance resilience of the water management system. The subject control structures are located miles away from the City Park project site and the City Park property is outside the limits of the subject watersheds. In June of 2023, the SFWMD and USACE came to agreement on the recommended study scope to enhance the capacity of the most vulnerable coastal water control structures and adjacent primary canals. Given the lack of proximity to these coastal structures, the City Park development would not affect any such enhancement efforts for water management.

Central and Southern Florida Resiliency Study (Section 216)



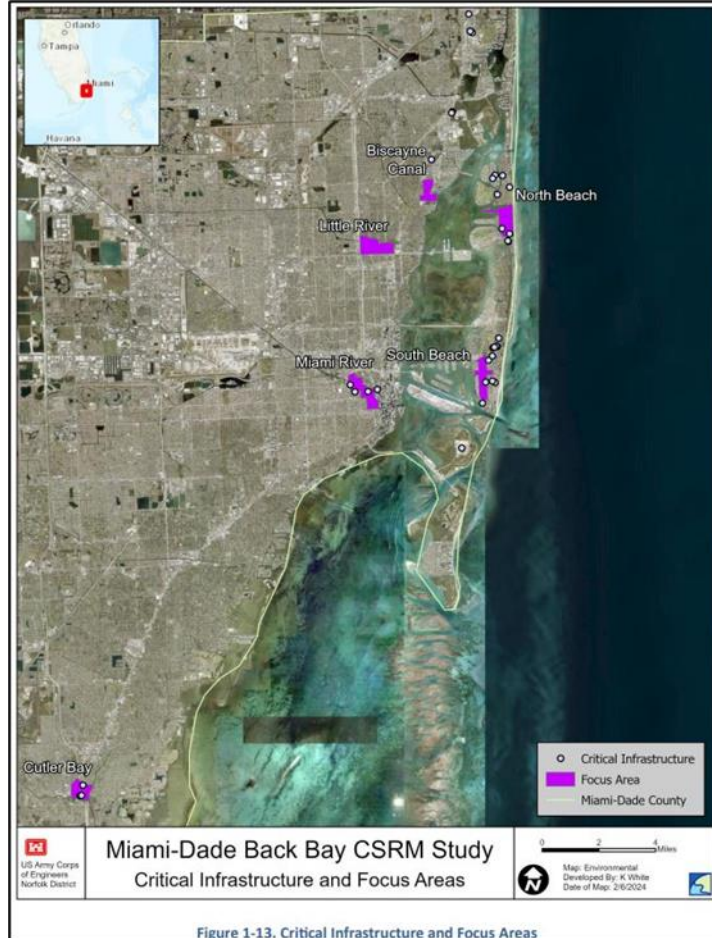
As for the Southern Everglades Study, the most recent (2024 Update) of the Integrated Delivery Schedule (IDS), identifies several CERP components for potential evaluation, none of which occur within proximity to the City Park site. Of the CERP components listed for the Southern Everglades (P20 in the IDS Project Locator), the closest to the City Park property include the potential L-31N improvements for seepage management and the Bird Drive Recharge Basin. These components would be relatively consistent with the originally

identified CERP project footprints for the L-31N Seepage Management Pilot and ENP Seepage Management, the southern extents of which occur approximately 1.8 miles and 4.4 miles north of the City Park property (see Figure 19-2). It should be noted that the Bird Drive Recharge Basin component was evaluated as part of the Biscayne Bay Southeastern Everglades Ecosystem Restoration (BBSEER) Project (P19 in the IDS Project Locator). This component was eliminated from consideration and is NOT included in the preferred alternative for BBSEER. The City Park development would not have any effect on the potential implementation of L-31N improvements or utilization of the Bird Drive Basin for additional seepage management.

Given the existing topography, lack of wetland conditions, and non-hydric soils at the City Park site, the potential viability of the property for use in any aspect of the Southern Everglades Study is minimal in comparison to the remaining expanses of wetland areas within the western and southern portions of Miami-Dade County, which are more appropriate for such regional restoration efforts. The intent of the Wetlands of Regional Significance designation in the Land Use Element of the Miami-Dade County Comprehensive Development Master Plan (CDMP) was to delineate such areas that could be utilized in support of CERP-related initiatives. The City Park property is not located within the limits of the Wetlands of Regional Significance designation and site conditions would not be conducive to the purpose of the Southern Everglades Study.

Finally, the Miami-Dade County Back Bay Coastal Storm Risk Management Feasibility Study (Back Bay) Final Integrated Feasibility Report and Environmental Assessment was released. The report identified six Focus Areas for consideration of higher risk areas that should be prioritized for risk management and protection of critical infrastructure. The City Park site does not occur near any of these Focus Areas, which mostly occur within coastal areas surrounding the northern portion of Biscayne Bay (see Figure 19-3). The closest Focus Area to the City Park site is identified as Cutler Bay and occurs approximately six miles southeast of the subject property. The proposed development would therefore have no effect on the potential implementation of flood risk management measures within any of the Focus Areas identified by the Back Bay study.

Miami-Dade Back Bay Focus Areas



- 17. 19-B (Page 19-1):** The applicant has not provided information regarding the potential use of wetlands within the stormwater management system. Please specify if wetlands, if any, will be integrated into the planned retention lakes and swales.

Response: The City Park project does not propose the creation of wetland areas as part of site development. However, the conceptual greenway is an integral feature of the site plan that includes significant surface water areas (i.e., stormwater lakes) that 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.

- 18. 19-C (19-2 Or 166):** Please provide information regarding how impervious surface area was calculated for residential uses. Table 19-1 does not provide a distinction

between detached and attached single-family homes relative to their impervious surface area.

Response: The impervious surface area was estimated using the average impervious surface data contained in USDA Urban Hydrology for Small Watershed TR-55 manual. An excerpt is below for reference.

Cover description Cover type and hydrologic condition	Average percent impervious area ^{2/}	Curve numbers for hydrologic soil group			
		A	B	C	D
<i>Fully developed urban areas (vegetation established)</i>					
Open space (lawns, parks, golf courses, cemeteries, etc.) ^{3/} :					
Poor condition (grass cover < 50%)		68	79	86	89
Fair condition (grass cover 50% to 75%)		49	69	79	84
Good condition (grass cover > 75%)		39	61	74	80
Impervious areas:					
Paved parking lots, roofs, driveways, etc. (excluding right-of-way)					
		98	98	98	98
Streets and roads:					
Paved; curbs and storm sewers (excluding right-of-way)					
		98	98	98	98
Paved; open ditches (including right-of-way)					
		83	89	92	93
Gravel (including right-of-way)					
		76	85	89	91
Dirt (including right-of-way)					
		72	82	87	89
Western desert urban areas:					
Natural desert landscaping (pervious areas only) ^{4/}					
		63	77	85	88
Artificial desert landscaping (impervious weed barrier, desert shrub with 1- to 2-inch sand or gravel mulch and basin borders)					
		96	96	96	96
Urban districts:					
Commercial and business					
	85	89	92	94	95
Industrial					
	72	81	88	91	93
Residential districts by average lot size:					
1/8 acre or less (town houses)					
	65	77	85	90	92
1/4 acre					
	38	61	75	83	87
1/3 acre					
	30	57	72	81	86
1/2 acre					
	25	54	70	80	85
1 acre					
	20	51	68	79	84
2 acres					
	12	46	65	77	82

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

Response: The existing agricultural area does not have any stormwater BMP's to properly treat the stormwater runoff from the property resulting in nutrient laden runoff leaving the property and could diminish the water quality in the area. The proposed project will include multiple stormwater BMP's that will properly treat the contributing runoff to meet the States current standards for watersheds located upstream of Outstanding Florida Water. The revised Conceptual Stormwater Management Master plan provides a conceptual design how this can be achieved.

20. **19-E (19-3 or 167): Clarification is needed regarding the maintenance of the proposed stormwater canal, specifically whether the HOA or South Florida Water Management District will operate and maintain the structure.**

Response: The operation and maintenance of the proposed stormwater lake and other stormwater BMP's not located in a public right-of-way will be maintained by the HOA. Any proposed stormwater BMP's located within the public right-of-way, such as exfiltration trenches in the public roadways, will be maintained by Miami-Dade County.

21. **Conceptual Stormwater Management Master Plan**

- **Water Quantity: The nutrient loading analysis assumes the entire site is developed as multi-family and single-family land use and does not provide results detailing the nutrient loading anticipated. Please include all land use types within the nutrient loading analysis, including industrial and commercial land uses to accurately reflect the development plans.**

Response: The nutrient loading analysis was revised with separate catchment areas for the different land uses. Please refer to the revised Conceptual Stormwater Master Plan for the analysis.

- **The conceptual plan does not outline where the swales, lakes, and exfiltration trenches are planned for the site, please include more detail on the location of these stormwater features.**

Response: The revised Conceptual Stormwater Master Plan has been revised to outline the location of the proposed swales, lakes, and exfiltration trenches.

Question 21. Transportation

22. **Please include the following missing roadway segments in the analysis:**

- **SW 144th Street**
- **SW 136th Street from SW 162nd Ave to SW 157th Avenue**
- **SW 152nd Street, from SW 162nd Avenue to SW 157th Avenue**

Response: The roadway links have been added to the analysis.

23. **Some Maximum Service Volume (MSV) values could not be verified. Please double-check for all roadways; few examples are below:**

- **SW 152nd Street from SW 112th Avenue to U.S. 1 is a state roadway with C3R context classification. The MSV should be 2,400 (2,000 X 1.20 {adopted LOS E + 20%}).**
- **SW 177th Avenue/Krome Avenue from SW 312th Street to SW 328th Street is a non-state roadway with a 30-mph speed limit. The MSV should be 756 (800 {LOS**

E} X 0.90 {adjustment for non-state} X 1.05 {adjustment for divided and exclusive left turn lane}).

- **State Road (S.R.) 874 is a 3-lane limited access roadway and should have an MSV of 6,080.**
- **SW 137th Avenue from S.R. 836 to SW 8th Street, is a state roadway with C3C context classification. The MSV should be 2,814 (2,680 X 1.05 {right turn lane adjustment}).**

Response: The Maximum Service Volumes (MSV) will be reviewed and revised as needed. See expanded roadway link charts in Appendix 21-7 for the MSV calculations.

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

Response: Columns have been added to clarify the MSV calculations. See expanded roadway link charts in Appendix 21-7.

- 25. It is unclear why some segments have two different thresholds for the two directions while their roadway characteristics are the same.**

Response: The discrepancy between the two directions was mainly due to the presence of right/left turn lanes that were not present in the opposing direction.

- 26. It is unclear how the D-factor was determined and utilized. For example, for Krome Avenue, the three-day D-factor ranges from 60.0% to 61.9%. Additionally, it is unclear how the peak direction of travel was determined for non-state roads.**

Response: The D factor was obtained from the historical AADT data published on the FDOT's Florida Traffic Online website. If a segment did not have AADT D-factor data, then the D factor of a nearby parallel roadway was used instead. The peak direction was determined by looking at the direction with higher PM peak traffic volumes for stations that provided Synopsis data. If a segment did not have Synopsis data, then it was assumed that the peak direction was the same direction as a nearby parallel roadway. If no Synopsis data was provided nearby, then it was assumed that the direction with the greater AADT volumes was the peak direction of travel. Please note that MDC does not collect/provide D-factor information.

- 27. In Table 21.A.3, some values in the "Existing PM Peak Hour Directional Volume" column could not be verified. For example, PDF page 55 of the Appendix of the Applicant's submittal shows that peak hour volumes for SW 136th Street from SW 137th Avenue to SW 127th Avenue to be 394 and 460 for EB and WB, respectively. The table shows these values to be 438 and 489. Please confirm or revise, as needed.**

Response: The volumes will be reviewed and revised as needed.

28. **It is unclear why sometimes the same roadway has different "Adopted LOS Standards". For example, NW/SW 137th Avenue from S.R. 836 to SW 8th Street, Table 21.A.2 shows a D LOS, whereas Table 21.A.3 shows E+20. Please check for all roadways and update, as needed.**

Response: The LOS standards will be reviewed and revised, as needed

29. **Consistent with the methodology, multimodal reductions should be based on mode share data related to commuters' transit and bike-pedestrian usage only. Please remove "Work from Home" reduction.**

Response: Although the area shows a gradual increase in the percentage of people who work from home, to be consistent with the methodology, the work from home reduction was removed.

30. **Consistent with the methodology, please make sure that the pass-by trips are limited to 10% of the adjacent streets' traffic volumes.**

Response: The pass-by trips meet the 10% threshold.

31. **Consistent with the methodology, trips from committed developments should be included. Please coordinate with FDOT and Miami-Dade County on the committed developments.**

Response: Committed developments obtained from MDC were included in the analysis.

32. **For a comprehensive review of the trip distribution, please provide the SERPM outputs.**

Response: The SERPM documentation has been added to the appendix 21-5 for review.

33. **The trip distribution percentages on Turnpike appear to be low. Coordination with Turnpike staff will occur once SERPM outputs are reviewed.**

Response: Comment noted.

34. **Please double-check the number of lanes for 2036 in Table 21.E.1. For example, westbound SW 104th Street from 157th Avenue to SW 147th Avenue should be 2LD.**

Response: The lanes will be reviewed and revised as needed.

35. **Please ensure that all segments are correctly highlighted. For example, SW 147th Avenue from SW 200th Street to SW 216th Street is exceeding MSV due to projected project traffic. Please revise accordingly.**

Response: Comment noted; the tables will be reviewed and revised as needed.

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

Response: Comment noted.

37. **Q21 Issues Overview by Topic and Agency**

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

1. Missing / Incomplete Analysis

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

2. Segment Analysis Errors / MSV Inconsistencies

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

3. Traffic Counts & Background Traffic Deficiencies

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

4. Trip Generation & Reductions Problems

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

5. Roadway Improvements, Mitigation, & Phasing

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

6. Access & Circulation Issues

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

- Rail crossing treatments & CSX coordination incomplete (RER)
7. **Multimodal, Transit, & TDM**
- CSX Spur not part of SMART Plan; transit assumptions unrealistic (TPO, DTPW)
 - No timelines for multimodal improvements (TPO)
 - Bus extensions require developer O&M funding (DTPW)
 - TDM plan vague, not enforceable (TPO, DTPW)
 - Missing transit hub details and infrastructure plans (TPO, DTPW)
8. **Modeling & Trip Distribution Errors**
- SERPM input/output files missing (RER, DTPW, GMX, SFRPC)
 - Unrealistically low traffic assigned to SR 874 & Turnpike (GMX, SFRPC)
 - Low traffic increases on local roads inconsistent with project scale (GMX)

Response: Comments noted.

Question 23. Hurricane Preparedness

38. Evacuation Routes

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

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

Response: It is important to clarify the regulatory context applicable to the City Park project. The City Park development is **not located within a Hurricane Vulnerability Zone**. Pursuant to Rule 73C-40.0256(4)(c), F.A.C., a project’s location outside a Hurricane Vulnerability Zone excludes it from review of impacts on hurricane evacuation routes. Accordingly, under the plain language of the Rule, a hurricane evacuation route impact analysis is **not required** for City Park. While the Applicant understands that the SFRPC is electing to pursue a regional analysis, such analysis is not mandated by Rule and is being undertaken at SFRPC’s discretion, not due to any regulatory obligation applicable to City Park.

In a memorandum dated February 23, 2026, the South Florida Regional Planning Council issued an evaluation of the City Park DRI's impact on hurricane evacuation routes based on FDOT's Transportation Interface for Modeling Evacuations (TIME) output and independent traffic engineering review. The analysis applied a conservative, worst-case scenario assuming a Category 5 storm and a 72 percent evacuation participation rate for Zone D. Under these assumptions, the project would generate approximately 842 peak-hour evacuation trips. When compared to 25 percent of the applicable peak-hour directional LOS E service volume thresholds, the project's contribution remained below the significance benchmark on all evaluated segments. Accordingly, the City Park DRI does not create a significant impact on regional hurricane evacuation routes and is not adverse to regional hurricane preparedness.

Importantly, even if the ongoing analysis were to suggest an adverse effect on a regional evacuation route, the results could not lawfully be used to impose mitigation requirements on the City Park development. Section 380.06(15)(e)1., Florida Statutes, provides that a local government may not include, as a condition of a development order for a DRI, any requirement that a developer contribute land, funding, or construction of public facilities unless the local government has enacted an ordinance requiring non-DRI development to contribute its proportionate share of such facilities, and unless the need for the facilities is reasonably attributable to the proposed development.

Miami-Dade County has not enacted an ordinance requiring non-DRI development to contribute proportionate funding, land, or facilities to mitigate impacts on hurricane evacuation or preparedness. As a result, City Park cannot be required to mitigate hurricane evacuation impacts, even in the unlikely event that a discretionary regional analysis—one not required due to the project's location outside a Hurricane Vulnerability Zone—were to indicate an adverse effect.

Despite having no obligation to do so under the applicable Rule or statute, the Applicant has committed, as a good-faith measure, to providing a hurricane shelter within the proposed high school to be constructed as part of the City Park development. This facility is anticipated to be more than adequate to accommodate projected public shelter evacuees in the unlikely event that up to 50 percent of the City Park population elects to evacuate. In addition, the project's master-planned design and proposed infrastructure improvements are intended to reduce risks associated with wind and flooding, further enhancing resident safety during storm events.

Finally, the Applicant notes that, in the fully executed *Agreement to Questions* dated May 8, 2025, the Applicant agreed to answer Question 20 in the ADA form and, "*to the extent necessary, use the SFRPC's regional evacuation studies...*" (emphasis added). This commitment was expressly conditional and does not constitute an acknowledgment that such studies are required for a project located outside a Hurricane Vulnerability Zone, nor does it confer authority to impose mitigation obligations beyond those authorized by Rule or statute.

39. Shelter Space

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

Response: The Applicant agrees with the **Miami-Dade County Department of Emergency Management (DEM)** analysis and its conclusions regarding hurricane shelter space potentially associated with the proposed City Park development, if the development were within a Hurricane Vulnerability Zone, which it is not.

As documented in the DEM review, City Park is located within Storm Surge Planning Zone D and is classified as new development with no existing occupants. Based on the County population multiplier applicable to the site's Minor Statistical Area, the project is projected to add approximately 20,836 to 22,296 persons at buildout. Consistent with DEM's methodology, this population increase results in an estimated 1,041 to 1,114 additional potential public shelter evacuees, assuming that approximately five percent (5%) of the additional population would seek public shelter during a storm event.

The 2024 ESRI Census identifies an existing population of approximately 642,282 persons within Storm Surge Planning Zone D. With the inclusion of City Park, 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. DEM appropriately concludes that accommodating this incremental increase in evacuees would require the opening of one to two additional evacuation centers.

Despite having no obligation to do so under the applicable Rule or statute, the Applicant has committed, as a good-faith measure, to providing a hurricane evacuation shelter within the planned on-site high school to be constructed as part of the City Park development. This facility is anticipated to be more than adequate to accommodate the projected public shelter demand attributable to the Project and would fully offset the estimated increase in evacuees identified in the DEM analysis. Indeed, the proposed shelter capacity is designed to accommodate evacuees in the unlikely event that up to 50 percent of the City Park population elects to evacuate.

In addition to the provision of on-site shelter capacity, the master-planned design of City Park and its proposed infrastructure improvements are intended to reduce exposure to wind and flooding hazards, further enhancing resident safety during storm events. Taken together, these measures ensure that City Park will not adversely affect Countywide shelter capacity and will remain consistent with DEM planning assumptions, while exceeding what is required under applicable regulations.

Question 24. Housing

40. Question A.1 not answered by phase

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

Response: Pursuant to the Agreement to Delete Questions, City Park is being reviewed as a 10-year single phase development.

41. Question A.3 not answered as requested

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

Response: The Applicant acknowledges that the original response to Question A.3 was qualitative in nature. While the development does not include a segmented marketing program by household type, the requested numerical and percentage breakdown is provided below based on the intended marketing approach.

The residential development will be marketed exclusively to the primary housing market. No units are proposed to be marketed as second homes, vacation homes, or to retirees as a distinct or targeted segment.

Accordingly, the target market distribution is as follows:

- **Primary homeowners and renters (general market):
100% of units**
These units are expected to attract a broad range of households typical of South Miami-Dade County, including singles, young couples, families with children, and empty-nesters.
- **Units marketed specifically to retirees:
0 units (0%)**
- **Units marketed as second homes or vacation homes:
0 units (0%)**

Because the project is not designed or marketed to differentiate units by household type (e.g., retirees versus families), no further numerical subdivision by demographic category

is proposed. All residential units will be marketed uniformly as primary residences, consistent with the project's location, unit types, and anticipated price points.

42. Question B not answered as written

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

Response: The Applicant acknowledges the Agency's comment regarding the request for a description of housing opportunities by type, tenure, cost range, and location within specified distance bands (adjacent, two miles, five miles, ten miles, and within the jurisdiction or county).

As set forth in the Application for Development and consistent with the approved methodology for the City Park DRI, the housing analysis was prepared in accordance with *The Housing Demand, Supply and Need Methodology for Assessing the Affordable Housing Impact of Developments of Regional Impact* (East Central Florida Regional Planning Council, as amended June 1999) (the "Methodology"). This Methodology evaluates housing availability based on a ten-mile or twenty-minute commute (whichever is less) rather than fixed concentric distance rings, recognizing that housing choice is driven by travel time, commuting patterns, and functional labor sheds rather than straight-line distance.

Accordingly, the City Park DRI housing analysis evaluates housing opportunities within a 20-minute commute which is less than the 10-mile as-the-crow-flies ring around the project. This approach is consistent with both the Methodology and prior DRI practice.

The Applicant notes that disaggregating housing supply strictly by concentric distance bands would not meaningfully alter the conclusions of the analysis, as the 20-minute commute market area fully encompasses two miles, five miles requested bands. The 10-mile ring is meaningless because the 20-minute commute is less than the 10-mile band. The 20-minute commute more accurately reflects real-world housing choice and commuting behavior.

Based on the approved Methodology, the Applicant submits that the housing analysis appropriately addresses housing availability by type, tenure, cost range, and location for purposes of the City Park DRI.

43. Employment opportunities outside the DRI not described

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

Response: The Applicant acknowledges the Agency's comment regarding Question B, which requests identification of employment opportunities in the local jurisdiction classified by two-digit SIC, including distance or transit time to the site.

As established in the City Park Application for Development Approval – Agreement to Delete Questions (May 8, 2025), the scope and methodology for demographic and employment analysis for the City Park DRI are governed by the binding agreement executed between the Applicant and the South Florida Regional Planning Council. That Agreement explicitly refines the employment analysis to focus on direct, on-site, permanent, non-construction employment, classified by North American Industry Classification System (NAICS), rather than broader regional job inventories.

Specifically:

- Part III – Demographic and Employment Information of the Agreement requires the Applicant to provide demographic and employment tables using NAICS classifications, not SIC codes.
- Question 24 (Housing) further clarifies that housing demand shall be estimated by calculating direct (on-site) permanent employment by NAICS, and notes that the Applicant *may forgo* estimating broader employment supply due to the County's documented housing deficit and the analytical focus on project-generated demand.

Consistent with this agreed methodology, the Applicant's response to Question B appropriately quantified jobs generated within the City Park DRI and did not attempt to characterize the surrounding regional employment base, which was not identified as a required analytical component under the Agreement to Delete.

With respect to indirect and induced employment, the Applicant notes that:

- These employment effects are secondary economic impacts, not direct employment opportunities associated with the project site.
- While such effects *can* be estimated using tools such as IMPLAN, the Agreement to Delete does not require indirect or induced employment estimates for Question B, nor does it require a regional employment inventory by distance band or transit time.

Notwithstanding the above, and to provide additional clarity to the Agency, the Applicant will supplement the response by:

- Confirming that City Park is located within the South Miami-Dade employment shed, with regional employment opportunities accessible within typical commuting times; and
- Clarifying that any IMPLAN-based indirect or induced employment estimates presented elsewhere in the ADA are intended solely for economic impact context, not as a substitute for or expansion of the direct employment analysis required under Question B.

Based on the binding Agreement to Delete Questions, the Applicant submits that the original response to Question B is consistent with the approved scope, methodology, and data requirements, and that the clarifications above adequately address the Agency's concern without expanding the analysis beyond what was contractually agreed to for the City Park DRI

44. Internal inconsistency in multifamily unit counts

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

Response: The multifamily rental unit distribution by rent range is derived by applying fixed percentage shares to the total 2,239 multifamily rental units. This calculation results in fractional units, which are converted to whole units using standard mathematical rounding for presentation purposes. As a result of rounding, the individual rent-range rows sum to 2,240 units, while the controlling total number of multifamily rental units remains 2,239, which is the value used in the total residential unit count of 7,800 units. No additional unit is proposed, and the residential development program is unchanged.

For clarification, the following note has been added to the Table: "**Note:** Unit counts by rent range are derived from percentage allocations and may differ from the total by ± 1 unit due to rounding; 2,239 multifamily rental units is the controlling total.

45. Internal inconsistency in retail floor area

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

Response: Retail square footage has been revised downward by 75,251 square feet. The proposed retail program has been reduced from 749,153 square feet to 673,902 square feet, and the applicant has revised the applicable sections of the Application for Development Approval, accordingly

46. Arithmetic error in affordable housing demand

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

Response: The analysis, results (tables) and narrative associated with affordable housing demand utilizing the ECFRPC Methodology have all been revised within the updated Application in accordance with the input and comments from applicable reviewing Agencies.

Inconsistent deficit figures after the 5 percent mitigation allowance

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

Response: Refer to Item 46 above.

Methodological choices bias the deficit upward and are not justified

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

Response: Per the ECFRPC methodology, the updated 1 2024 to November 30, 2025, the entire database will be included as an Appendix.

The analysis of affordable ownership housing supply has been completed in the updated Application and is consistent with the East Central Florida Regional Planning Council's *Housing Demand, Supply and Need Methodology for Assessing the Affordable Housing Impact of Developments of Regional Impact*. Specifically, the updated Application utilizes home sales transactions within the RMA during the historical 12-month period from December 1, 2024 to November 30, 2025. The database supporting sale transactions by sale price has been included within the updated Application.

47. Demand side limited to on-site direct jobs only

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

Response: The demand-side analysis is consistent with the City Park DRI Agreement to Delete, which establishes that affordable housing demand is to be estimated based on direct, on-site, permanent, non-construction employment associated with the development. In accordance with that approved framework, the analysis intentionally excludes indirect and induced employment, as well as secondary housing demand effects associated with population growth generated by residential units within the project. This approach is consistent with the adopted DRI methodology for City Park and reflects the scope of analysis agreed to by the Applicant and reviewing agencies. The methodology is therefore not incomplete, but rather purposefully constrained to the employment demand specifically attributable to the DRI, as set forth in the governing Agreement to Delete

48. Project housing program does not address identified need

Tables 24 B.3 to 24 B.7 show moderate income ownership affordability capped at roughly \$347,500 and moderate net rents capped near \$2,416. Table 24 A.1 prices all single-family units above \$550,000 and most townhomes above \$450,000. Forty percent of rentals start above \$2,750. The response identifies a deficit of very low-

and low-income units and relies on moderate income supply in the surrounding market, yet the City Park housing program itself provides almost no units affordable at the very low, low, or moderate thresholds, and it does not acknowledge or address this mismatch.

Response: The Applicant acknowledges the comment regarding the relationship between the identified affordable housing needs and the proposed housing program pricing. The housing affordability analysis was prepared for purposes of quantifying demand, supply, and need in accordance with the approved DRI methodology and was not intended to establish unit-level pricing commitments within the City Park housing program at this stage of planning. The updated Application provides the affordable housing needs assessment associated with the City Park DRI.

49. Inconsistent use of HUD affordability standards

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

Response: The Applicant acknowledges the inconsistency in the narrative discussion of affordability standards. Consistent with HUD affordability criteria, housing costs will be evaluated at no more than 30 percent of household income for both rental and ownership units. The analysis will be revised accordingly, and all applicable sections, tables, and conclusions will be updated to reflect the uniform application of the 30 percent standard. This modification has been incorporated in this submittal.

50. Question B requirement for “projected availability” is not met

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

Response: As per the ECFPRC methodology, and referenced in Item 48 above, the supply analysis evaluates homeownership sales within the RMA during the past 12-month period (December 1, 2024 to November 30, 2025). The supply of current vacancy within multifamily rental buildings is based upon updated report from Costar. Additionally, the analysis identifies multifamily rental developments recently added to the market (and not captured by Costar), as well as new developments currently under-construction. Specifically, the analysis identifies affordable (rent-restricted) developments within the RMA.

51. Documentation and clarity problems

Examples include the phrase “first quarter of Q4 2024” for QCEW data, undefined acronyms in some tables, and very large, detailed appendices without a clear summary of how headship rates and multi worker households are converted into

dwelling unit demand. These issues make replication and review of the calculations difficult.

Response: The Applicant has addressed documentation and clarity issues identified in the review. All acronyms used in tables and appendices have been defined at first reference, and imprecise phrasing (such as “first quarter of Q4 2024”) has been corrected for consistency with standard data-reporting conventions. In addition, a narrative explanation has been added summarizing how headship rates and multi-worker household assumptions were applied to convert employment and population estimates into projected dwelling unit demand. This narrative clarifies the calculation steps that were previously embedded in detailed appendice.

52. Additional comments

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

Response: Specific to Q24, there is no reference to “workforce” or “attainable” housing. As it relates to “nexus for transactional sales...” the updated analysis utilizes homeownership transactions from Miami Dade County Property Appraiser (MDCPA) for the historical 12-month period from December 1, 2024 to November 30, 2025. The City Park analysis follows the ECRPC methodology requiring a 5% vacancy factor and 2.5% substandard factor be applied to the existing housing inventory analysis (Table 24-B.10). As an additional step to assessing housing sales, the analysis eliminates housing deemed non-arm’s length by removing all sales less than \$50,000.

Question 29. Energy

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

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

Response: The Applicant is in the process of coordinating with FPL.

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

Response: Acknowledged.

Question 39. Sea Level Rise

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

Response: The Applicant has evaluated potential sea level rise (SLR) and groundwater inundation impacts over the 50-year planning horizon using the Unified Sea Level Rise Projection Report (2019) developed by the Southeast Florida Regional Climate Change Compact, as incorporated into Chapters 11C and 24 of the Miami-Dade County Code

Based on this evaluation, the following categories of proposed on-site infrastructure are potentially vulnerable to long-term SLR and associated increases in groundwater elevation:

- **Local roadways and sidewalks**, particularly low-lying internal streets that could experience periodic nuisance flooding absent elevation or drainage controls.
- **Stormwater management infrastructure**, including canals, swales, conveyance pipes, and retention areas that must function under higher tailwater and groundwater conditions.
- **Sanitary sewer infrastructure**, including gravity lines, manholes, and lift station components that could be subject to inflow, infiltration, or backflow under elevated groundwater conditions.
- **Electrical and utility infrastructure**, including transformers, panels, junction boxes, and underground vaults susceptible to inundation or corrosion if not elevated or sealed.

The Applicant commits to incorporating the following measures into the final engineering and construction of on-site infrastructure that is vulnerable to sea level rise:

- **Roadways and Sidewalks (Commitment):**
Internal streets and pedestrian corridors will be designed with finished grades elevated to approximately 4.5 feet above current mean sea level, consistent with the NOAA Intermediate-High projection curve, to maintain flood-free access over the planning horizon.
- **Stormwater and Canal Systems (Commitment):**
Drainage systems, including canals and retention areas, will be engineered to operate under elevated groundwater conditions, with raised invert elevations, increased storage capacity, and basin sizing based on 2040–2070 projections. Retention areas will serve dual functions of flood attenuation and groundwater buffering.
- **Green Infrastructure (Commitment):**
Bioswales and rain gardens will be incorporated where feasible to slow runoff, promote infiltration, and mitigate localized groundwater rise impacts.
- **Sanitary Sewer Infrastructure (Commitment):**
Manholes and utility vaults will be elevated or sealed above projected groundwater levels, and non-return valves will be installed where appropriate to prevent sewer backflow during high groundwater or storm events.
- **Electrical and Utility Systems (Commitment):**
Electrical equipment, including transformers and panels, will be elevated above the projected 2070 SLR design elevation (approximately 4.5 feet NAVD) or protected using watertight enclosures rated to anticipated flood depths.

Conclusion

Through these committed design measures, the Applicant will ensure that all on-site infrastructure potentially vulnerable to sea level rise is planned, designed, and constructed to maintain functionality and resilience over the 50-year planning horizon. These commitments will be implemented through final site engineering, utility design, and permitting processes, consistent with Miami-Dade County policy and regional climate adaptation guidance.

Question 40. Agriculture

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

Response: See below.

Water Supply

In regard to water supply, the Subject Property is currently utilized for agricultural production, consisting primarily of row crops irrigated with on-site groundwater wells.

Agricultural irrigation represents a substantial existing demand on the Biscayne Aquifer that is not reflected in public utility potable water allocations.

Based on University of Florida IFAS guidance for Miami-Dade County row crops, irrigation demand for vegetables typically ranges from approximately 0.9 to 2.2 acre-feet per acre per year, depending on crop type, irrigation method, and seasonal conditions. This equates to approximately 300,000 to 700,000 gallons per acre per year.

Applying this range to the approximately 960 acres of existing row crops, current agricultural irrigation demand is estimated to be on the order of:

- 0.86 to 2.1 million gallons per day (MGD) on an annualized basis (equivalent to approximately 288 to 672 million gallons per year).

This existing demand is supplied entirely by private agricultural wells and represents a continuous withdrawal from the Biscayne Aquifer.

The proposed development will replace agricultural irrigation with a potable water system, with an estimated total water demand of approximately 4.6 MGD at full buildout. This demand includes residential, commercial, institutional, and landscape irrigation uses, and will be served by public water infrastructure in accordance with Miami-Dade County concurrency and utility service standards.

Importantly, the transition from agricultural use to urban development results in a shift in water source and water management, rather than the introduction of water demand on previously undeveloped land. The existing agricultural irrigation demand—currently unmetered within the public utility system—will be eliminated upon development. In addition, urban landscape irrigation demand will be substantially reduced relative to agricultural row-crop irrigation due to the use of drought-tolerant landscaping, irrigation efficiency requirements, non-potable reuse where applicable, and seasonal irrigation controls mandated by County code.

Accordingly, when existing agricultural groundwater withdrawals are considered, the proposed development does not represent a net new water demand of the full 4.6 MGD, but rather a managed replacement of an existing high-intensity irrigation use with a more efficient, regulated urban water use pattern. This transition supports long-term water resource sustainability, improved aquifer management, and consistency with Miami-Dade County's water supply planning and conservation objectives.

Stormwater Management

In regard to stormwater management, the design standards for City Parks stormwater management plan must be consistent with County and state requirements. Although the final stormwater plan cannot be prepared until detailed civil engineering plans for the project are completed, City Park has committed to providing a stormwater system that will be fully sufficient for its residents without causing any adverse impacts on adjoining

properties. Although most projects in urban areas are designed to accommodate the “25 year 3-day” storm event, City Park has committed to meeting the design requirements for the “100 year 3-day” storm event. Obviously, this greater level of flood protection will be a benefit to the residents of City Park because their risk of flooding will be substantially reduced and their flood insurance premiums will be minimal. This enhanced level of flood protection will also be a benefit to the entire County because this community will not burden public services when a large storm event does occur.

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

Response: The percentages shown for nursery and row crops acreages have been update based on Table 34. However, the updated numbers in the revised Question 40 – Agriculture, still support the previous conclusions.

The Applicant has considered water resources and transportation needs associated with the Agricultural sector at a programmatic and regional level appropriate to the scope of the City Park DRI review. The conclusions of the Agricultural Land Use Trends and Outlook analysis remain valid and are not altered by additional consideration of these systems.

With respect to **water resources**, the project site is currently used for low-intensity row crop agriculture reliant primarily on groundwater withdrawals for irrigation. As documented in the application materials, the proposed development will transition water demand from dispersed, seasonal irrigation withdrawals to regulated potable and non-potable service provided through the regional utility system. This transition is consistent with long-range water supply planning assumptions and will reduce reliance on agricultural irrigation withdrawals at the site. Importantly, the project does not reduce water availability to existing agricultural operations elsewhere in the County, nor does it alter allocation priorities established by regional water management authorities.

With respect to **transportation**, the project site does not serve as a critical freight corridor for nursery, floriculture, or row-crop distribution activities, nor is it relied upon for the movement of agricultural inputs or products at a regional scale. The conversion of the site

does not impede access to remaining agricultural lands, does not disrupt farm-to-market routes, and does not diminish the operational efficiency of the County's dominant agricultural sectors. Transportation improvements associated with the project are designed to accommodate projected urban travel demand and do not displace or constrain agricultural transportation functions elsewhere in the County.

More broadly, the Applicant notes that the County's agricultural economy—particularly nursery and floriculture operations that generate the vast majority of agricultural sales—operates largely independent of the project site and its associated infrastructure. The conversion of a limited area of low-value row crop land does not adversely affect the water resource systems or transportation networks that support the Agricultural sector as a whole.

Accordingly, while the Applicant acknowledges the importance of water and transportation systems to agriculture Countywide, the proposed development does not adversely affect those systems, nor does it impair the continued viability of agricultural operations beyond the project site. The Applicant's analysis therefore appropriately addresses these considerations at a level commensurate with the scale, location, and nature of the proposed development.

- 58. It is noted by the applicant that the Study projects declining demand for agricultural land through 2050, with thousands of acres expected to fall out of production; therefore, removal of approximately 1,000 acres does not jeopardize the minimum acreage needed to sustain a viable agricultural industry. However, the Study did not incorporate in its analysis the current rate of development occurring in Miami-Dade County. Committed developments will need to be considered in the analysis of availability of agricultural land for a viable industry.**

Response: The Applicant acknowledges the comment regarding consideration of committed development activity in evaluating the long-term availability of agricultural land. For DRI purposes, *committed developments are defined as approved developments anticipated to generate a significant level of impact*, and such developments are required to be considered where applicable in background and land availability analyses.

As part of the analysis, the Applicant reviewed available information regarding approved and committed development within the study area. Based on agency confirmation, there were no committed developments identified within the study area at the time of analysis. Specifically, in a December 17, 2025, email to Juan Espinosa, Anamersy Arce, Traffic Engineer III with Miami-Dade County's Department of Transportation and Public Works, confirmed that "there are no committed developments within the study area."

In addition, the agricultural lands evaluated in the Study are located outside the Urban Development Boundary (UDB). Any approved or committed non-agricultural development within these areas would therefore require a formal expansion of the UDB through a comprehensive plan amendment process. No such UDB expansion approvals have been granted or identified within the study area. Accordingly, there were no approved or

committed development projects to incorporate into the agricultural land availability assessment.

The Applicant's analysis therefore appropriately relied on documented trends in agricultural land use, including projected declines in acreage under cultivation through 2050, and evaluated the proposed removal of approximately 1,000 acres within that context. Given the absence of identified committed developments and the continued applicability of UDB constraints, the conclusions regarding the continued viability of the regional agricultural industry remain unchanged.