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May 7, 2026

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

RE: City Park Development of Regional Impact (DRI) Statement of Information Needed (SIN2)

Dear Mr. Bercow:

South Florida Regional Planning Council staff, in coordination with partner review agencies, has reviewed the proposed City Park DRI's second Application for Development Approval (ADA2) (submitted on March 23, 2026) for Sufficiency pursuant to §380.06(10), Florida Statutes (Fla. Stat.) [2015] and Rule 73C-40.022(3), Florida Administrative Code (F.A.C.) [2015]. As you are aware, the proposed City Park DRI met the requirements of §380.06(12)(b)2., Fla. Stat., and is subject to review under the 2015 versions of §380, Part I, Fla. Stat., and Rule 73C-40, F.A.C. These statutes and rules, along with the Agreement to Delete (executed between the Council and Applicant, May 19, 2025), were employed to determine Sufficiency.

Upon review of the Council and partner agencies, please find herewith requests for additional information. ADA2 is deemed to be insufficient, as defined by Rule 73C-40.022(3)(c) and the City Park DRI Applicant's response to the questions as outlined in the Agreement to Delete (dated May 8, 2025). The SFRPC also received input from partner review agencies, including requests for additional information. The SFRPC's requests are presented in SIN2 by ADA Question. The partner review agencies' requests for additional information are provided as attachments and considered part of SIN2. Please address all comments within the SFRPC Memo and partner agency attachments.

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

Sincerely yours,

A handwritten signature in blue ink that reads "Isabel Cosío Carballo".

Isabel Cosío Carballo, MPA
Executive Director





MEMORANDUM

DATE: MAY 7, 2026

TO: CITY PARK DRI APPLICANT

FROM: SOUTH FLORIDA REGIONAL PLANNING COUNCIL

SUBJECT: STATEMENT OF INFORMATION NEEDED (2):
CITY PARK DRI ADA2 SUFFICIENCY REVIEW

The South Florida Regional Planning Council (Council) staff has conducted the sufficiency review of the proposed City Park Development of Regional Impact's (DRI) second submittal of Application for Development Approval (ADA2) in response to the Statement of Information Needed (SIN1) transmitted on November 25, 2025 and pursuant to §380.06(10), Florida Statutes (Fla. Stat.) [2015], Rule 73C-40.022(3), Florida Administrative Code (F.A.C.) [2015], and Agreement to Delete (ATD dated May 8, 2025). As part of this review, the SFRPC also received input from partner review agencies.

Based on the SFRPC staff's evaluation and the feedback provided by the reviewing agencies, the ADA is **insufficient**. This Memo, the comments below, and the attachments from partner agencies constitute the Statement of Information Needed (SIN2) (e.g., the additional information, clarifications, and revisions required to address the identified issues and to meet the sufficiency requirements). All SFRPC comments and partner agency and government comments must be addressed, as listed within this Memo and its referenced attachments.

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

Please see Attachments A (SFRPC comments) and B (other agencies' comments) for all comments to be addressed.



South Florida Regional Planning Council
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Attachment A

South Florida Regional Planning Council

Q10 Project Description

Premature Development (Page 10-31): The Applicant relies on demand for single-family homes alone to support the application for Urban Development Boundary (UDB) expansion. The Miami-Dade regulations for UDB expansion do not specify demand for one individual housing type as a basis for Urban Development Boundary expansion. Furthermore, regulations clearly state that agricultural land is to be avoided. There is housing supply within the UDB through 2040 and a critical need for agricultural land, which is forecasted to be insufficient to sustain industry by 2030.

Please revise.

Q11 Revenue Generation

Please note that the issue regarding the accuracy of the revenue generation calculations contained in the submitted information has not been addressed, including the following:

1. Commercial water/sewer revenue (p.11 R1-10) uses a wrong unit conversion. The narrative states that "136M gallons $\div$ 100 CCF $\times$ \$8.61/CCF," treating CCF as 100 gallons. 1 CCF = 748 gallons. The correct analysis is $136,000,000 \div 748 \times \8.61 = about \$1.57M for restaurants, not \$11.8M. With the 50% non-dining adder and vacancy factor, the corrected commercial total is about \$2.2M, not \$17.3M. Total annual water/sewer drops from \$25.8M to about \$10.8M, and the 10-year Table 11-1 figure is overstated by roughly \$70–80M.
2. Building permit revenue (Table 11-1) shows \$63.4M, which is 2.25% of total development cost (TDC), not the stated 2.0% of hard cost. Since hard cost is normally below TDC, the correct figure should be at or below \$56.4M ($2.0\% \times \$2.819B$), not above it.
3. Gasoline tax (p.11R1-9) assumptions don't reconcile. $7,800 \text{ HHs} \times 1.83 \text{ vehicles} \times 1.4 \text{ gal/day} \times 365 = 7.29M \text{ gal/yr}$, not the 6.0M used. At \$0.199/gal, corrected revenue is ~\$1.45M, not \$1.2M.

Please revise.

Q17 Water Supply

Include Parks and Open Space Water Non-Potable Water Usage within the Land Use Water Demand tables on page 17. Please demonstrate how total water demand equals the 4.6 MGD mentioned in the agriculture section. Please revise accordingly.

Q19 Stormwater Management

1. 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.

Page 30 - The Nutrient Loading Analysis incorporates the various land uses, but the acreage varies from Table 10-2 Existing and Proposed Land Uses. For example, in Table 10-2, 40 acres are allocated as industrial. The Revised Stormwater Management Master Plan mentions 90.50 acres of industrial.

2. The conceptual plan does not outline where the swales, lakes, and exfiltration trenches are planned for the site. Please include more details on the location of these stormwater features.

Information not provided.

Q21 Transportation

1. Initial Comment (11/2025): Please include the following missing roadway segments in the analysis:
 - SW 144th Street
 - SW 136th Street from SW 162nd Avenue to SW 157th Avenue
 - SW 152nd Street, from SW 162nd Avenue to SW 157th Avenue

Applicant's Response (03/2026): The roadway links have been added to the analysis.

Follow-up Comment (04/2026): Addressed.

2. Initial Comment (11/2025): Some Maximum Service Volume (MSV) values could not be verified. Please double-check for all roadways. A few examples are provided 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}).

Applicant's Response (03/2026): 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.

Follow-up Comment (04/2026): Partially addressed. The Maximum Service Volume (MSV) values still could not be verified for SW 177th Avenue/Krome Avenue from SW 312th Street to SW 328th Street. Please provide the requested information.

3. Initial Comment (11/2025): Please include columns for context classification for the 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.

Applicant's Response (03/2026): Columns have been added to clarify the MSV calculations. See expanded roadway link charts in Appendix 21-7.

Follow-up Comment (04/2026): Addressed.

4. Initial Comment (11/2025): It is unclear why some segments have two different thresholds for the two directions while their roadway characteristics are the same.

Applicant's Response (03/2026): 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.

Follow-up Comment (04/2026): Thank you for the explanation. However, some MSV's calculations are still inconsistent. For example, SW 177th Avenue/Krome Avenue from SW 8th Street to SW 12th Street has exclusive turn lanes for both directions; however, the adjustment is only for the northbound direction. Please revise as requested.

5. Initial Comment (11/2025): 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.

Applicant's Response (03/2026): 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.

Follow-up Comment (04/2026): Addressed.

6. Initial Comment (11/2025): 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 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.

Applicant's Response (03/2026): The volumes will be reviewed and revised as needed.

Follow-up Comment (04/2026): Not addressed. Please revise.

7. Initial Comment (11/2025): 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 the D, whereas Table 21.A.3 shows E+20. Please check for all roadways and update, as needed.

Applicant's Response (03/2026): The LOS standards will be reviewed and revised, as needed

Follow-up Comment (04/2026): Addressed

8. Initial Comment (11/2025): Consistent with the methodology, multimodal reductions should be based on mode share data related to commuters' transit and bike-pedestrian usage only. Please remove the "Work from Home" reduction.

Applicant's Response (03/2026): 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.

Follow-up Comment (04/2026): Addressed

9. Initial Comment (11/2025): Consistent with the methodology, please make sure that the pass-by trips are limited to 10% of the adjacent streets' traffic volumes.

Applicant's Response (03/2026): The pass-by trips meet the 10% threshold.

Follow-up Comment (04/2026): Addressed

10. Initial Comment (11/2025): Consistent with the methodology, trips from committed developments should be included. Please coordinate with FDOT and Miami-Dade County on which ones.

Applicant's Response (03/2026): Committed developments obtained from MDC were included in the analysis.

Follow-up Comment (04/2026): It appears that the committed trips have been included. Consistent with Miami-Dade's comment (#93), committed developments generating more than 100 peak-hour vehicles must be considered. Please revise the report accordingly, as the report states a threshold of over 400 peak-hour trips.

11. Initial Comment (11/2025): For a comprehensive review of the trip distribution, please provide the SERPM outputs.

Applicant's Response (03/2026): The SERPM documentation has been added to Appendix 21-5 for review.

Follow-up Comment (04/2026): Addressed

12. Initial Comment (11/2025): The trip distribution percentages on Turnpike appear to be low. Coordination with Turnpike staff will occur once SERPM outputs are reviewed.

Applicant's Response (03/2026): Comment noted

Follow-up Comment (04/2026): Addressed

13. Initial Comment (11/2025): 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.

Applicant's Response (03/2026): The lanes will be reviewed and revised as needed.

Follow-up Comment (04/2026): Addressed

14. Initial Comment (11/2025): 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 project traffic. Please revise accordingly.

Applicant's Response (03/2026): Comment noted; the tables will be reviewed and revised as needed.

Follow-up Comment (04/2026): Addressed

15. For some context classifications, the LOS E threshold is not provided in the M/QLOS handbook. For these segments within these context classifications, LOS E were calculated based on the difference between LOS C and LOS D. M/QLOS handbook notes that LOS greater than LOS D is not applicable for these roadways, as volume greater than LOS D becomes F because intersection capacities have been reached.
16. It should be noted that SW 162nd Avenue does not connect directly from SW 144th Street to SW 136th Street. **Please revise the map series to reflect this disconnection. Please include the railroad corridor on the map series.**

17. Project trip assignments in the volume development sheet are not consistent with the trip distribution map (J-E1) and/or link analysis table (21.A.2). Two examples are noted below:

- Eastbound approach at SW 157th Avenue/SW 152nd Street intersection should be 34% instead of 30%.
- Eastbound approach at SW 127th Avenue/SW 120th Street intersection should be 3% instead of 2%.

Please revise.

18. Based on the link analysis results, several intersections need to be analyzed. It is understood that some "minor" intersections were excluded; **please provide the analysis for the following signalized intersections:**

- SW 157th Avenue/SW 104th Street
- SW 157th Avenue/SW 112th Street
- SW 157th Avenue/SW 144th Street

19. **Please provide the locations, spacing, and turn lane restrictions for all access points.** For any significantly impacted links, please provide the required traffic operational analyses. In particular, it is essential that the Applicant coordinate early and regularly with FDOT District Six regarding the proposed access points along Krome Avenue. Approval of the DRI does not imply approval of access connections to the state roadway system. Similarly, proposed access to SW 136th Street that would require crossing the existing rail line may present significant approval challenges. An assumption that the rail line crossing will be approved cannot be made, and if they are not approved, the proposed traffic distribution assumptions will need to be revised accordingly.

20. Upon review of the Synchro files, we believe that several improvements identified under the Future Without Project scenario are not needed to meet the target LOS thresholds. A few examples of unnecessary lane improvements are provided below:

- At SW 137th Avenue/SW 120th Street intersection, the exclusive westbound right-turn lane
- At SW 127th Avenue/SW 120th Street intersection, the additional eastbound through & exclusive right-turn lane, northbound through & left-turn lane, and westbound through
- At SW 122nd Avenue/SW 120th Street intersection, the additional northbound through, exclusive eastbound right-turn lane, and exclusive southbound left-turn lane
- At SW 157th Avenue/SW 184th Street intersection, the second southbound left-turn lane

- At SW 157th Avenue/SW 120th Street intersection, the exclusive westbound left-turn lane

These improvements may therefore not be the responsibility of the maintaining agency, but that of the developer. **Please revise.**

21. Westbound right-turn movement at SW 157th Avenue/SW 136th Street intersection is shown to exceed the target LOS threshold and is also shown to have a 95th-percentile queue of over 60 vehicles in the Future With Project With Improvements scenario.

Please identify mitigations.

Comments on Q21 from the following agencies are also included by reference:

Florida Department of Transportation – District 6

Miami-Dade County

Greater Miami Expressway Authority (GMX)

Florida Commerce – Bureau of Community Planning and Growth

Q23 Hurricane Preparedness

Shelter Space

Please provide sufficient information to demonstrate that evacuation shelter capacity will be available to serve the proposed development population, including documentation and analysis demonstrating whether the proposed on-site high school would offset anticipated shelter demand consistent with applicable emergency management standards. Please also provide information regarding compliance with the American Red Cross Hurricane Evacuation Shelter Selection Standards (ARC HESSS), as well as sufficient supporting analysis regarding the functionality and suitability of the proposed school facilities for use as emergency shelters.

In addition, please provide sufficient information regarding coordination between the Applicant, the Miami-Dade County Department of Emergency Management, and Miami-Dade County Public Schools related to evacuation shelter planning, emergency operations, and school-based sheltering capacity. The Applicant's statement that coordination will occur is not sufficient, absent supporting documentation, analysis, or commitments demonstrating how hurricane preparedness needs associated with the proposed development will be addressed.

Please provide the requested information.

Q24 Housing

Please define the reference of “workforce” and “attainable” housing in terms of Area Median Income for clarity.

- Within the “Affordable and Workforce Housing” section on Pages 10-24, the Applicant mentions a minimum of 12.5% of units will be set aside for workforce or attainable housing. Please identify the area median income level used to define “Workforce” or “attainable” housing.

Please reconcile the housing supply provided, which indicates there is a surplus of affordable housing units within the study area. In comparison, the Shimberg Center for Housing Studies’ 2025 Annual Report indicates that Miami-Dade County continues to have a deficit of affordable housing units. Funded by the Florida Legislature, the Shimberg Center for Housing Studies is recognized as providing the best available data and information about Florida’s housing needs and supply.

Q27 Education

The application does not provide sufficient information to demonstrate that there is consistency with the methodology and development program used to calculate school demand by Miami-Dade County (RER) and Miami-Dade County Public Schools. **Additional information is needed to reconcile methodologies, assumptions, and calculation approaches used to project school enrollment impacts associated with the proposed development.**

Q40 Agriculture

Please revise the response to acknowledge that the application / proposed development does pose impacts on water supply. The current site is estimated to use 0.86 to 2.1 million gallons per day, while the Applicant notes that 4.6 MGD are needed for the development, more than doubling the amount of water currently required. This is an unequivocal increase in demand, contrary to water conservation efforts in Miami-Dade County. This project, therefore, does not support long-term water sustainability but pulls existing water demand away from developments within the UDB and constricts water supply to the surrounding agricultural area. **The Applicant must evaluate water demand and supply comprehensively. Revise by incorporating the development’s total impact on water use and demand in comparison with the site’s current water use.**

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

**MIAMI-DADE COUNTY (INCLUDING RER, TPW, TPO, WASD, DEM)
FLORIDA COMMERCE
FLORIDA DEPARTMENT OF TRANSPORTATION DISTRICT SIX
GREATER MIAMI EXPRESSWAY AUTHORITY
VILLAGE OF PINECREST**

ATTACHMENT B
CITY PARK DRI ADA2
SUFFICIENCY REVIEW COMMENTS

1 MD COUNTY RER DTPW TPO City Park ADA2 Review

2 FL COMMERCE City Park ADA2 Review

3 FDOT VI City Park DRI ADA2 Review

4 GMX City Park DRI ADA2 Review w Addtl Comment

5 SFWMD Comments City Park DRI ADA2 Review

6 FDEP Comments City Park DRI ADA2 Review

7 MDCPS City Park DRI ADA2 Review

8 FWC City Park DRI ADA2 Review

9 FPL City Park DRI ADA2 Review

10 Pincrest_Village City Park DRI ADA2 Review

Memorandum



Date: April 27, 2026

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

From: Alex Dambach, AICP, Planning Development Manager 

Department of Regulatory and Economic Resources (RER)

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

Various County agencies reviewed the City Park second Application for Development Approval (ADA2) submitted March 23, 2026, to the South Florida Regional Planning Council and disseminated for review to various agencies on the same day. Below are the comments on this second review. These findings do not represent any assessment, determination, or conclusion regarding consistency of this application with the Comprehensive Development Master Plan (CDMP), the Zoning Ordinance, nor any other statutory requirements. The following are findings of deficiency for the second round of this application.

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

- The Water and Sewer Department has reviewed the Development Program and Engineering Report submitted for the sufficiency review of the City Park DRI ADA2 and finds the information sufficient to assess the impacts of the proposed development.

The Miami-Dade County Department of Regulatory and Economic Resources – Water Control Section finds the Application for Development Approval to remain deficient and notes that additional information is required:

Regarding Question 19

1. The Water Control Section of the Department of Regulatory and Economic Resources has reviewed the response document, "MIAMI-DADE-COUNTY-COMMENTS-Applicant-Response.pdf" and "Attachment 19-1: Conceptual Stormwater Management Master Plan," signed and sealed by Michael P. Carr, P.E., dated March 20, 2026. The revised report is not consistent with the response to comments provided; therefore, previous comments remain.
2. Please note that the following comments are related to demonstrating consistency with CDMP Objectives CON-4 and CON-5. The report has the following deficiencies that must be addressed:
 - a. Page 28 of 50, "Stage vs. Storage Calculations," must remove the storage attributed to the building (Column 8) from the 100-year/3-day flood-routing calculation.
 - b. Provide the conceptual location of the proposed 66-acre lake(s). **Include a conceptual site plan in the Conceptual Stormwater Management Master Plan.**
 - c. Provide the conceptual location of the proposed 220.09 acres of parks. **Include a**

conceptual site plan in the Conceptual Stormwater Management Master Plan.

- d. The project is assumed to discharge to the lake(s). However, the report does not acknowledge that the land use (former agricultural lands) requires an environmental assessment, and that the use of lakes for stormwater retention may be limited due to potential contamination. Revise the report to acknowledge the potential presence of contamination and the resulting limitations.
- e. Page 7 of 50 of the report states that exfiltration trenches will be designed for the 5-year, 1-hour storm event prior to discharge to the on-site wet retention area, and runoff volumes are calculated with a 3.28-inch credit. This credit can only be granted if the exfiltration trenches are designed for the 5-year/1-day storm event. Revise the calculations accordingly.
- f. The exfiltration trench calculations on page 33 of 50 use a hydraulic conductivity (K) of 9.79E-04. Clarify the basis and assumptions for the selected K value, or provide a copy of the signed and sealed geotechnical report.
- g. The report does not address the canal reservations or the planned canal. The planned canal is assumed to provide flood protection within the area, including lands west and south of the proposed development. The conceptual stormwater master plan must demonstrate that the project will not diminish the level of flood protection, accounts for the planned canal, is not in conflict with it, will not interfere with the historic or required conveyance functions of stormwater infrastructure in the area, and explains how the planned canal's level of service will be maintained.
- h. The property is encumbered by two 130-footwide canal reservations along the western and southern boundaries, recorded in Miami-Dade County Official Record Book 7131, Page 561, and Official Record Book 7118, Page 390.
- i. Per coordination with Water Control Section staff, the following options have been provided:
 - i. The 130-foot-wide canal reservations may be released in exchange for an equivalent area of an 80-foot-wide canal right-of-way, as shown in the attached exhibits (two possible alternatives).
 - ii. Existing 130-foot-wide canal reservations within the proposed development:
 1. ORB 7131, Page 561: 130' x 2,640' = 343,200 sq. ft.
 2. ORB 7118, Page 390: 130' x 3,960' = 514,800 sq. ft.
 3. Total area: 858,000 sq. ft.
 - iii. Verification of equivalent area conversion (80-foot-wide canal right-of-way): 80' x 10,725' = 858,000 sq. ft.
 - iv. Alternative 1: 80' x 10,725' = 858,000 sq. ft. (connection assumed at SW 162 Avenue)
 - v. Alternative 2: 80' x 10,725' = 858,000 sq. ft. (connection assumed at SW 167 Avenue)

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

Regarding the Application Overall

- Map C - Topographic must specify whether the contour elevations are measured in feet or another unit. Additionally, it must indicate the vertical datum used (e.g., NAVD88 or NGVD29). Lastly, the base flood elevation should be clearly identified on the map. - **Responded**
- Map G – Sampling Locations: Spell out “DTW”. - **Responded**

- Page 10-1: The reported acreage is inconsistent between the DRI and the CDMP applications. Please clarify and confirm the correct gross and net acreage of the application site to ensure consistency across all documents submitted to the County and to SFRPC. – **This is not addressed in the revised Question 10 document.**
- Page 10-2: If the 7,800 units are designated for residential use, please clarify the number of residential units separately proposed for mixed-use development. – **This information needs to be provided with Table 10.A.1 in addition to being a footnote in Table 10-2**
- Page 10-2: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed. – **This project is described as a Transit-Oriented Development on the basis of the referenced CSX Portland Spur. Documentation needs to be provided documenting that such service will exist to serve this development.**
- The “Proposed Development Program” table, Table 10.A.1 does not show the mixed-use development program including number of units nor square footage of non-residential use. – **This information needs to be provided with Table 10.A.1 in addition to being a footnote in Table 10-2**
- Page 10-3: Please provide studies, data, or supporting documentation demonstrating that the proposed development pattern will lead to a measurable reduction in reliance on all types of single-occupancy vehicles. – **Documentation is needed to specify how the densities, travel distances, transit services, mix of uses, and site layout are to be provided specifically for this project and how they will specifically reduce single-occupancy reliance in a measurable way at this project.**
- Page 10-4: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed. Submit detailed information about this project. **This project is described as a Transit-Oriented Development on the basis of the referenced CSX Portland Spur. Documentation needs to be provided documenting that such service will exist to serve this development**
- Page 10-4: Provide the maximum and average walking distance from the farthest residential units to their nearest commercial/infrastructure areas to serve resident daily-need land uses (e.g., grocery, pharmacy, school, transit stop). This information is essential to evaluate the walkability and functional integration of the proposed development.- **This information should be verified with a map showing the furthest distances of residential units to commercial/infrastructure areas to serve resident daily-need land uses (e.g., grocery, pharmacy, school, transit stop)**
- Page 10-5: The acreage shown in this page differs from the acreages shown in the CDMP application. – **Net acreage is inconsistent**
- Table 10-2: As stated previously, this table does not provide the number of residential units for the mixed-use component of the proposed development. - **Responded**
- Page 10-5: Please provide a land contamination assessment for the site. If the site is designated or suspected to be a brownfield, include documentation of its status, any remediation plans, and any coordination with applicable environmental agencies. – **To be addressed**
- Page 10-6: The trade area analysis does not appear to be centered on the actual proposed locations of the retail components within the site. Please resolve this.
- Page 10-8: A map of the Residential Market Area is needed. - **Responded**
- Page 10-9: Please explain why the County’s population projections are not used. - **Responded**
- Page 10-9: Is this total growth for the 30-year period specified? Furthermore, it is already 2025, so 10 years or 1/3 of that period has already passed. Please clarify. - **Responded**

- Page 10-9: Provide justification for the assumption that the RMA's growth outlook will reach average annual growth rate in line with historical growth trends and even higher. - **Responded**
- Page 10-9: Include other developments occurring in the RMA and their projected population growth accommodation, including infill development on individual lots. - **Responded**
- Page 10-10: The population multiplier used is lower than the County's population multiplier. The County multiplier for this Minor Statistical Area calculates a population of 22,296 people resulting from the proposed development. - **Responded**
- Page 10-11: It is necessary to estimate the typical salaries associated with the proposed job types to determine how many individuals earning those salaries would be able to afford housing within the proposed development. Also, please insert a closing parenthesis to the acronym "ICSC". - **Responded**
- Page 10-17: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed. **This project is described as a Transit-Oriented Development on the basis of the referenced CSX Portland Spur. Documentation needs to be provided documenting that such service will exist to serve this development.**
- Page 10-18: The fact that the property is designated "Agriculture" does not address the specific need for expanding the UDB. The application should acknowledge that the site is in an area that "Should be Avoided" according to Policy LU-8G. - **Responded**
- Page 10-19: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur, as there is no indication of this project being proposed. **This project is described as a Transit-Oriented Development on the basis of the referenced CSX Portland Spur. Documentation needs to be provided documenting that such service will exist to serve this development.**
- Page 10-19: A comprehensive capacity analysis must demonstrate that existing infrastructure, such as water, sewer, transportation, and stormwater systems, can adequately serve the proposed development without degrading the level of service for existing communities. - **Responded**
- Page 10-19: Provide documentation that the application area is a 'transitional' agricultural zone. - **Responded**
- Page 10-27: Provide the list of infrastructure extensions (linear feet) and water/sewer flow. Also, see comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur, as there is no indication of this project being proposed. **This project is described as a Transit-Oriented Development on the basis of the referenced CSX Portland Spur. Documentation needs to be provided documenting that such service will exist to serve this development.**
- Page 10-29: Provide specific responses to Florida Statute 163.3177(9). - **Responded**
- Page 10-30: Provide a list and the locations of origins and destinations available in the development, and their distances from each other, to serve as evidence that they can be accessed by pedestrians within the development to eliminate or reduce the need for use of private automobiles. **.- This information should be verified with a map showing the furthest distances of residential units to commercial/infrastructure areas to serve resident daily-need land uses (e.g., grocery, pharmacy, school, transit stop)**
- Page 10-31: Explain the phrase, "coordinated with programmed capital improvements" and identify which capital improvements are currently programmed to serve this site. - **Responded**
- Page 10-33: Application needs to use the Minor Statistical Area (MSA)-specific school and population multipliers. - **Responded**

- Page 11-1: Please provide an analysis of the potential impacts that the addition of 7,800 new dwelling units and associated commercial development, over a relatively short 10-year period, may have on residential and commercial property values within the surrounding trade area. - **Responded**
- Page 11-8: Are gas stations proposed as part of the development? Identify how many and where. - **Responded**
- Page 13-2: This question asks about proposed wetlands and not about mitigation banks. The question should be answered based on the proposed lakes, waterways, littoral plantings, etc. cited earlier, in accordance with sustainability practices. - **Responded**
- Page 17-1: The number of units in the water demand table is inconsistent with the development program. - **Responded**
- Table 17-1 is inconsistent with the development program. - **Responded**
- Table 18-1 is inconsistent with the development program. - **Responded**
- The Water and Sewer table in Attachment A contains an incorrect mix of residential units. – **Revised Attachment not found in resubmittal**
- The attached survey is illegible and lacks bearings and distances and match lines or a key map. – **Revised Attachment not found in resubmittal**
- Table 21.A.4: Row 2 states a bike lane would be widened from 2 to 4 lanes. This appears to be a typographical error. - **Responded**
- Table 21.A.4 and Table 21.A.5: Please note that Kendall Parkway – SR 836 is not to be considered for roadway mitigation. - **Responded**
- Page 21-17: See comments provided by TPO, Transportation, and DTPW, below, regarding the referenced CSX Portland Spur. Provide documentation of this project being proposed. **This project is described as a Transit-Oriented Development on the basis of the referenced CSX Portland Spur. Documentation needs to be provided documenting that such service will exist to serve this development.**
- Page 21-17: Provide confirmation from Miami-Dade Transit that the level of service described therein will be provided. - **Responded**
- Page 21-18: See comments provided by TPO and DTPW, below. Details are needed to support the stated 5 percent reduction in vehicle trips. - **See Transportation and DTPW comments below**
- Table 21.B1: Regarding reduction rates, the Application needs to provide sound evidence that infrastructure will be provided and typical usage rates to support the stated rate of transit/ped usage. - **See Transportation and DTPW comments below**
- Page 21-20: Similar to the request for justification of the transit/ped reduction, detailed information based on actual behavior needs to show that this internal trip reduction is realistic. - **See Transportation and DTPW comments below**
- Page 21-40: Provide distances, methods of access to the identified existing transit stations/stops. This is for both regional and local transit. - **This information should be verified with a map showing the furthest distances of residential units to commercial/infrastructure areas to serve resident daily-need land uses (e.g., grocery, pharmacy, school, transit stop)**
- Map on Page 24-7: Provide documentation providing the basis for this map's depictions typical 20-minute travel times. - **Responded**
- Page 28-1: Show a map and typical travel times to the listed hospitals. - **Responded**
- No page number, section 29.E.b: Please explain why single-family dwellings are not included in the proposed commitment to use of cool roofs. - **Responded**

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

Specifically Regarding Transportation (Question 21)

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

Response: Comment noted; the text was revised.

second review comments: noted

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

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

second review comments: noted

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

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

second review comments: Pages 21R1-17 and 21RI-42 still references this project as a TOD, with a node aligned with the CSX Portland Spur and SMART PLAN.

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

Response: Comment noted.

second review comments: noted

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

Response:

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

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

- Sidewalks – approximately 24 miles

second review comments: Pages 21R1-18, 19, and 42 - the justification for increasing the transit trip reduction from 1.6% to 5% is not supported. While the proposed 23 miles of bicycle lanes and 24 miles of sidewalks may improve access to transit, the referenced facility does not meet the functional criteria of a transit hub, as it is designed to accommodate only two buses and would serve, at most, two routes. This service is contingent upon potential extensions of Routes 152 and 137, for which there is currently no agreement with the transit agency, nor evidence of coordination or outreach by the applicant. Furthermore, the proposal does not include transit circulator services connecting the site to nearby activity centers or existing bus routes. In the absence of enhanced transit service or committed infrastructure, maintaining existing conditions does not justify an increase in the transit trip reduction to 5%.

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

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

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

second review comments: The justification for increasing the transit trip reduction from 1.6% to 5% is not supported. While the proposed 23 miles of bicycle lanes and 24 miles of sidewalks may improve access to transit, the referenced facility does not meet the functional criteria of a transit hub, as it is designed to accommodate only two buses and would serve, at most, two routes. This service is contingent upon potential extensions of Routes 152 and 137, for which there is currently no agreement with the transit agency, nor evidence of coordination or outreach by the applicant. Furthermore, the proposal does not include transit circulator services connecting the site to nearby activity centers or existing bus routes. In the absence of enhanced transit service or committed infrastructure, maintaining existing conditions does not justify an increase in the transit trip reduction to 5%.

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

Response: As agreed upon within the agreement to delete (Section 21.G), the

internalization was performed based on the rates outlined in ITE's Trip Generation Handbook, 3rd edition.

second review comments: noted

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

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

second review comments: noted

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

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

second review comments: noted

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

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

second review comments: noted

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

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

second review comments: Page 21R1-19 - The internal capture of trips between school and residential uses was not previously approved. Staff typically do not support internal capture for school trips, as it is not recognized by ITE methodologies. However, in this case, staff indicated a willingness to consider a limited level of internal capture, provided the applicant can substantiate such assumptions with supporting data or studies from developments of similar size and type.

-
- ~~12. The traffic analysis includes only PM peak hour directional analysis. Staff require~~

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

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

second review comments: noted

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

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

second review comments:

Page 21R1-22: For committed developments that were recently approved in the vicinity of the project, please include Kendall Town Center DRI along with the already included Portofino project.

Table 21.D2: Committed development trips were included but also include the development order trips in the analyses from the concurrency database maintained by the County.

Tables 21.D2 and 21.E1: Include count station numbers.

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

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

development timeline. The applicant would need to address the possibility of these improvements not occurring.

Response: Comment noted.

second review comments: A response from applicant saying 'noted', is not enough to address staff's comments. The applicant must address staff's concern that if they are expecting the County to build these roads, then it's not going to happen before the buildout date, which means the infrastructure needed to support this application would not be available to mitigate the impacts from this project.

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

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

second review comments: noted

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

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

second review comments: noted

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

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

second review comments: noted

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

Response: The project will secure the crossings with CSX.

second review comments: Please provide documentation of coordination with CSX, including any correspondence or agreements, demonstrating that the proposed railroad crossing improvements and operational considerations will be reviewed and approved by CSX.

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

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

second review comments: noted

Specifically Regarding Housing (Question 24)

Prior comments have been addressed.

Specifically Regarding Education (Question 27)

- *Development Program Please note that the RER previous comments are applicable, in that there is no revised analysis, sources cited, or any high/low scenarios and range of scenarios presented. **The submittal remains not sufficient.***

Applicant's Table 27-1 lists: 1,029 single-family (detached) units, 4,532 townhomes and 2,239 multifamily units, totaling 7,800 residential units. However, the analysis sent to Miami-Dade County Public Schools (M-DCPS) was for a different analysis, namely 6,771 multifamily units, zero single-family detached units, albeit with the same 1,029 single-family (detached) units. The applicant indicated that analysis sent to M-DCPS contained the incorrect residential breakdown, and that a revised analysis is still pending.

However, the analysis provided by M-DCPS, under application No. PH3025102700636 dated November 5, 2025 listed the project student population at: 1,029 elementary school students, 337 middle school students, and 435 senior high school students, for a total of 1,482 students. Of those students, the preliminary analysis showed capacity was not available within the concurrency school area, and capacity was met by the schools at the adjacent service area school. The M-DCPS analysis details that of the student breakdown: 249 students were expected to attend Miami Heights Elementary School--over ± 6.45 miles away from the application site; 247 students to Jack David Gordon Elementary School—over ± 2.17 miles away; 70 students to Dr. Gilbert Porter Elementary School-- ± 3.06 miles away; and all 435 students to Miami Sunset Senior High School-- ± 7.36 miles away.

Also, the pending revised analysis to M-DCPS for the correct residential breakdown will result in more students, as the student multiplier for that area for the not-entered 1,029 single family detached units is *higher* than the multiplier for the 6,771 multifamily units entered for M-DCPS.

Given the large number of residential units proposed, and the expected distance between the proposed development and the adjacent schools, it is recommended that the applicants contact M-DCPS to discuss options of donating land, materials or other methods suggested by M-DCPS. Of concern is the disconnect between the applicant's social media stating the new development would be a single area to "live, work, play and learn."

Site Location: The applicant has not provided any analysis why they cannot meet Policy EDU-3A, dismissing it by stating it is a 'should' and conflicts with EDU-3A. When schools are proposed inside the UDB, at times the school distance requirement cannot be met, especially in urbanized areas. However, this application site is not located within a built up, developed and urbanized area. The applicant has not adequately demonstrated why the EDU-3A policy cannot be met, especially for undeveloped areas such as the application site located outside the UDB.

In addition, this relates to Question 23 Hurricane Preparedness. Previous RER comments are applicable, as the questions raised pertaining to any school serving as an emergency evacuation shelter, state standards, and DTPW coordination, as outlined in Objective EDU-4 and Policies EDU-4A, EDU-4B and EDU-4E. Nor is the question of wildlife survey and analysis addressed. The applicant's response that they will "coordinate with DEM" does not address the referenced issues raised, and more information is required.

Of note, while school concurrency analysis is preliminary, before the application advances it is recommended the applicant meet with M-DCPS to address their school impacts.

Specifically Regarding Agriculture (Question 40)

- No new submittals are required.

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

- DEM will consider the applicant's response sufficient if it demonstrates that the planned on-site high school offsets potential evacuee demand by at least 1,114 people and explains how it meets the American Red Cross Hurricane Evacuation Shelter Selection Standards (ARC HESSS) for shelter space.

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

Traffic Engineering Division

A. Traffic Engineering Division

A. Traffic Study Review Comments

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

2nd Follow-up 4/21/2026: **Comment not addressed.**

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

2nd Follow-up 4/21/2026: **Comment addressed.** *As per revised study, the additional segment volume data was obtained from count stations provided by National Data & Surveying Services (NDS) and data is provided.*

3. Section B (Trip Generation):

- ~~a. The trip generation assumes a 9.8% reduction due to employees working from home; however, this adjustment is not acceptable, as telecommuting conditions are subject to change in the future.~~

*2nd Follow-up 4/21/2026: **Comment addressed.** The trip generation was revised to remove the 9.8% reduction.*

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

*2nd Follow-up 4/21/2026: **Comment not addressed.** As per response to comments, the existing 2.2% of other modes of transportation is expected to increase as the project expands accessibility to other modes of transportation and provide pedestrian generators for the existing nearby communities. The project is committed to providing a mobility hub (accommodating a minimum of two express MDC bus routes) that will connect to the existing nearby communities, and an extensive network of pedestrian pathways and bikeways to encourage walking and cycling. However, the 5% multimodal reduction is contingent upon site plan/traffic study review.*

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

*2nd Follow-up 4/21/2026: **Comment not addressed.***

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

*2nd Follow-up 4/21/2026: **Comment not addressed.** The trip generation table was revised to show 39.5%. However, please refer to comment 3e.*

- ~~e. Please note that the proposed 39.5% internal capture rate will contingent upon site plan review. As per the trip generation handbook section 6.5.1, Development Size: The data that form the bases for the internal capture methodology are from mixed-use development sites that have between 100,000 and 2 million sq. ft. of building space and an overall acreage of up to roughly 300 acres. The mixed-use development should fall within those ranges. It can be a single site, a block, or a district or neighborhood (with multiple interconnected or interactive blocks within a defined boundary); however, this procedure should not be used for a development~~

composed of different adjacent, but not directly connected, land uses. Adjacent blocks can be directly connected if there is an internal street, driveway, alley system, or pedestrian way by which person trips can be made to travel from one block to another. If the development site has multiple land uses and the blocks are configured in such a way that internal trips must exit the site and use an external street system, then the site is not a mixed-use development.

2nd Follow-up 4/21/2026: **Comment not addressed.** *Please note that the 39.5% internalization between the residential and school trips is contingent upon site plan/traffic study review.*

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

2nd Follow-up 4/21/2026: **Comment addressed.** *As per response to comments, the transit hub is expected to serve a minimum of two express MDC bus route that will connect to the existing nearby communities.*

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

2nd Follow-up 4/21/2026: **Comment not addressed.** *As per response to comments, the existing 2.2% of other modes of transportation is expected to increase as the project expands accessibility to other modes of transportation and provide pedestrian generators for the existing nearby communities. The project is committed to providing a mobility hub (accommodating a minimum of two express MDC bus routes) that will connect to the existing nearby communities, and an extensive network of pedestrian pathways and bikeways to encourage walking and cycling. However, the 5% multimodal reduction is contingent upon site plan/traffic study review.*

~~4. Appendix 21-2: Please provide the D-factor for the MDC traffic counts.~~

2nd Follow-up 4/21/2026: **Comment addressed.** *As per response to comments, no D-factors are available for the data on the MDC concurrency tables. As no D-factors are available, the D factor of a nearby parallel roadway was used to analyzed the MDC segment counts.*

~~5. Section D (Background Traffic Growth Rate): Please clarify the rationale for applying a lower growth rate (0.7%) to roadway segments closer to the subject site compared to the higher rate (1.4%) applied to segments farther away. Additionally, please clarify which agency approved the use of these percentages.~~

2nd Follow-up 4/21/2026: **Comment waived.** *As per response to comments, the*

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

2nd Follow-up 4/21/2026: **Comment not addressed.**

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

2nd Follow-up 4/21/2026: **Comment addressed.**

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

2nd Follow-up 4/21/2026: **Comment not addressed.** *As per response to comments, the proportionate share calculations will be provided once the traffic study is found sufficient.*

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

2nd Follow-up 4/21/2026: **Comment not addressed.**

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

Roadway	Limits	Required Right of Way (Typical Section must be accepted by the Highway Division)
SW 167 Avenue	SW 136 Street and SW 152 Street	Minimum of 80' of ROW
SW 172 Avenue	SW 136 Street and SW 152 Street	Minimum of 70' of ROW
SW 144 Street	SW 177 Avenue and SW 162 Avenue	Minimum of 70' of ROW

2nd Follow-up 4/21/2026: **Comment noted.**

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

2nd Follow-up 4/21/2026: **Comment not addressed.**

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

Transportation Planning and Policy Division

A. Q21 - Transportation Comments

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

- a. Include explicit modal split percentages and persons-per-vehicle assumption, as the question requires them and they are not clearly presented.
- Section F - Highway Network Modifications: NOT Sufficient- Needs more information. Table 21.F.1 identifies roadway segments with deficiencies and describes responsibility per statute. However, the response is not clear on which improvements are DRI-triggered (Can assume it is the last set of improvements listed, but it is not clear) or the timing of such improvements, as required by the question.

Missing Information:

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

Missing Information:

- a. The question asks how the access plan will minimize impacts and preserve traffic flow. The response lists design standards but lacks a narrative explanation of how access management will achieve this need to add an explanation of impact mitigation measures (e.g., median control, shared access, turn lane design, signal coordination).
 - b. The applicant must review with the County Traffic Engineer County Section line roads and County half section line roads

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

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

- Section I Multimodal Provisions / Non-Auto Travel: – NOT Sufficient. Sections 1–4 describe regional transit connectivity, pedestrian/cyclist infrastructure, and TDM strategies (ridesharing, vanpools, transit incentives, etc.).
 - a. Access to regional transit is not sufficient – The Kendall corridor of the SMART Plan is more than 3 miles south of the city park DRI site. While it will provide regional transit service at a future date, the project is currently under development by FDOT and does not have an estimated implementation date. There are currently no plans to create

transit service along the Portland rail spur. This connection will still require vehicular trips to move access regional transit

- b. Access to local transit. Not sufficient – while metrobus route 152 provides service in the general vicinity, it does not provide the required 20-minute headways. While the County is capable of extending this route to the new community, the fiscal impact for new buses needed and operations and maintenance must be addressed by the development prior to the County deeming the application sufficient
- c. The applicants' agreement to promote TDM is not sufficient in addressing how this will be implemented. It is unclear what the benefits of promoting staggered work schedules, flex time, WFH, rideshare incentives will be. Nor is an actual program established by the county to keep track and monitor such programs.
- d. Public Transit Incentives: It is unclear how this measure will provide benefit to the occupants of the project as they may not be employed within the city park DRI area.
- e. Informational Kiosks: These kiosks should be located near the transit terminal and areas of high density residential and commercial units.

If you have any questions concerning the comments, or wish to discuss this matter further, please contact Brandon Fennell Brandon.Fennell@miamidade.gov.

April 23, 2026

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

Re: City Park Application for Development Approval ADA2
File No. ADA 11-25-001

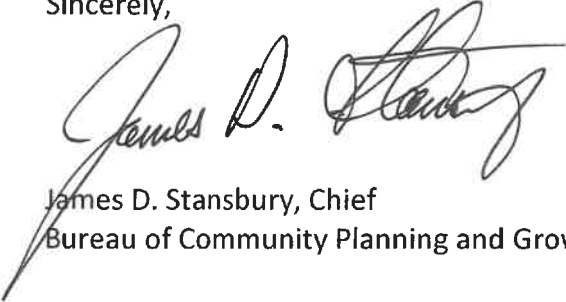
Dear Ms. Lerch,

FloridaCommerce has finalized its review of the second sufficiency response regarding the proposed City Park Development of Regional Impact (DRI) Application for Development Approval (ADA). We appreciate the Applicant's attention to our initial inquiries.

1. Given the significant impacts that a data center can have on state and regional resources and facilities, it is imperative that such developments are not categorized simply under general land use definitions like "office" or "industrial." Appropriate data and analysis must be included as part of the ADA. Mitigation measures must also be detailed within the development order. Allowing reliance on current building standards and public facility requirements at the time of seeking building permits would compromise the comprehensive planning efforts associated with a DRI review. Should the developer want to postpone any approvals related to data centers, the development order for City Park must clearly state that this approval does not encompass data centers. In this case, the development order would require amendments to permit any data centers on site and must establish suitable mitigation for any significant impacts on regional and state resources and facilities. An in-depth analysis on the impacts of potential data centers to the master-planned development must be included in the next ADA.
2. The Department will conduct its review of Question 21 – Transportation, Section H: Protection of Transportation Corridors once the segment analysis is concluded and transmitted.

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

Sincerely,



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

JDS/cn

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

Kathe Lerch

From: Isabel Cosio Carballo
Sent: Friday, April 17, 2026 12:09 PM
To: 'Jeffries, Ken'; SFRPC Admin; GPENN@BRZONINGLAW.COM
Cc: Iglesias, Daniel; Carver, Jennifer; John.McWilliams@kimley-horn.com; Huynh, Dat; Christina Miskis; Solaun, Heidi
Subject: RE: Request for Sufficiency Review – City Park DRI ADA2 (Due April 22, 2026)

Thank you so much Ken!! Happy Friday to everyone!! It was great to see you last Friday Secretary Iglesias. Thank you for joining us at the TCRPC / SFRPC Joint Council Meeting.

All the best to everyone and best wishes for a great weekend!

😊 Isabel

Mrs. Isabel Cosio Carballo, MPA
Executive Director
South Florida Regional Planning Council
1 Oakwood Boulevard, Suite 250
Hollywood, FL 33020
isabelc@sfrpc.com; www.sfrregionalcouncil.org
954 924 3653; cell 954 240 3012



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From: Jeffries, Ken <Ken.Jeffries@dot.state.fl.us>
Sent: Friday, April 17, 2026 11:48 AM
To: SFRPC Admin <sfadmin@sfrpc.com>; Isabel Cosio Carballo <isabelc@sfrpc.com>; GPENN@BRZONINGLAW.COM
Cc: Iglesias, Daniel <Daniel.Iglesias@dot.state.fl.us>; Carver, Jennifer <Jennifer.Carver@dot.state.fl.us>; John.McWilliams@kimley-horn.com; Huynh, Dat <Dat.Huynh@dot.state.fl.us>; Christina Miskis <CMiskis@sfrpc.com>; Solaun, Heidi <Heidi.Solaun@dot.state.fl.us>
Subject: RE: Request for Sufficiency Review – City Park DRI ADA2 (Due April 22, 2026)

Hi Isabel – The Florida Department of Transportation (FDOT) has reviewed the City Park DRI's second Application for Development Approval (ADA) submittal, dated March 2, 2026. The FDOT has the statutory responsibility to review and provide comments upon DRIs and their transportation impacts upon regionally significant roadways including Strategic Intermodal System (SIS) facilities, such as SR 997/Krome Avenue. It's important to point out and reiterate that FDOT's comments for ADA2 are substantially the same as our comments on ADA1.

The City Park DRI is bounded by SW 136th Street (Howard Drive) to the north, SW 152nd Street (Coral Reef Drive) to the south, SW 162nd Avenue to the east, and SR 997/Krome Avenue (SW 177th Avenue) to the west and is currently outside of the County's urban development boundary (UDB). Overall, the DRI at buildout will generate 4,817 new external PM peak-hour trips.

The submitted traffic study indicated that nearby roadway segments of SR 997/Krome Avenue will have sufficient capacity to accommodate the project's traffic volume at buildout. However, it failed to include technically sufficient information regarding how the project will directly access SR 997/Krome Avenue; where those access connections will be located; if right- and/or left-turns lanes are needed along SR 997/Krome Avenue to serve those driveways; and if those access connections will operate at an acceptable level of service.

Access connections can significantly influence the trip distribution of the development. In the absence of a detailed access plan of proposed connections and their configurations (particularly to SR 997/Krome Avenue), it is possible that the transportation analysis may require revisions.

Because the access connection information was not contained in the submitted documentation, the FDOT finds the City Park DRI ADA to be insufficient. The FDOT requests that additional information be provided. We are available if the Applicant wishes to resolve any outstanding concerns.

Technical Comments

1. The Applicant must coordinate with FDOT regarding proposed access to SR 997/Krome Avenue. SW 136 Street on the east side of SR 997/Krome Avenue (which is currently unsignalized) is offset from the west approach of SW 136 Street (which is currently signalized). It is FDOT's position that a properly aligned 4-legged signalized intersection is the optimal configuration.
2. Map J-G1 depicts proposed project access locations, including four direct connections to SR 997/Krome Avenue. SR 997/Krome Avenue in this area is designated as an Access Class 2 facility. Such access must be coordinated with FDOT and satisfy various criteria, such as spacing, as prescribed in Florida Administrative Code (FAC), Chapters 14-96 and 14-97. It is noted that revised or altered project access may affect the project's trip distribution, which would impact roadway segment and intersection analyses and possibly result in revising the transportation analyses.
3. No information was provided concerning the proposed lane geometry and intersection control needs at the four proposed connections to SR 997/Krome Avenue. Further, no operational analyses were provided to indicate that these intersections will operate at acceptable levels of service. It is recommended that such analyses be provided to verify the operations, turn lane needs, and traffic control proposed at each access connection.
4. Please note that in the submitted transportation analysis text, figures, and tabular references to all state roadway facilities should include the state road number (e.g., SW 177 Avenue should also be reference as "SR 997/Krome Avenue") to avoid confusion and improve clarity regarding jurisdiction. Please add these labels.

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

Phone: (305) 470-5445, Fax: (305) 470-5205
E-mail: ken.jeffries@dot.state.fl.us

From: SFRPC Admin <sfadmin@sfrpc.com>

Sent: Monday, March 23, 2026 4:17 PM

To: Yee Fong, Shereen <Shereen.YeeFong@dot.state.fl.us>; Iglesias, Daniel <Daniel.Iglesias@dot.state.fl.us>; Jeffries, Ken <Ken.Jeffries@dot.state.fl.us>; Carver, Jennifer <Jennifer.Carver@dot.state.fl.us>; John.McWilliams@kimley-horn.com; Huynh, Dat <Dat.Huynh@dot.state.fl.us>

Subject: Request for Sufficiency Review – City Park DRI ADA2 (Due April 22, 2026)

EXTERNAL SENDER: Use caution with links and attachments.

Dear Federal, State, Regional, and Local Agency Partners,

On March 23, 2026, the Applicant (Parkland West, LLC, et al.) submitted the second Application for Development Approval (ADA2) to the South Florida Regional Planning Council (SFRPC).

ADA2 reflects the applicant's responses to the executed Agreement to Delete and incorporates a reduction of 75,251 square feet of retail (from 749,153 to 673,902 SF) as well as responses to prior agency comments (Statement of Information Needed-1). Agencies are requested to review the ADA2 materials, the Agreement to Delete, and SIN1: <https://sfregionalcouncil.org/city-park-dri-review-materials/>

Action Requested:

Please have your agency's designated representative submit a written recommendation on **sufficiency** by **Wednesday, April 22, 2026**:

- Indicate whether the ADA **meets or does not meet sufficiency**; and
- If not sufficient, provide the basis and any explanatory comments.
-

Please send recommendations concurrently to:

- SFRPC: sfadmin@sfrpc.com
- Applicant: GPENN@BRZONINGLAW.COM
-

SFRPC will issue its formal sufficiency determination on May 7, 2026.

Per Rule 73C-40, F.A.C., sufficiency is met when information is provided in a manner that allows agencies to assess impacts; it does not imply agreement with conclusions. Additional information requests should be limited to clarifications or new issues directly arising from submitted materials. Comments and questions not referenced or included within SIN1 may not be used by the Council as the basis for additional sufficiency questions and may be answered solely at the applicant's discretion.

For questions regarding the sufficiency review process or DRI procedures, please contact sfadmin@sfrpc.com.

Thank you for your coordination.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | klerch@sfrpc.com



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REVIEW COMMENTS



Prepared by: HNTB

Prepared for: The Greater Miami Expressway Authority

Title of Document Reviewed: City Park DRI Application for Development Approval 2
(ADA2) Transportation Component

Name of Development: City Park

Date: April 20th, 2026

Overview

The second version of the Development of Regional Impact (DRI) Application for Development Approval 2 (ADA2) for the proposed City Park project was reviewed on behalf of GMX.

Findings and Comments

1. **Kendall Parkway was deliberately excluded** from trip assignment or impact testing because the capacity of the SR 836 extension is not available for the use of any new development. This approach is consistent with the CDMP Amendment restrictions for Kendall Parkway.

Follow up comment: None.

2. The ADA identifies SR 874 as a regional facility expected to attract trips generated by the proposed development. However, based on the data presented, the number of trips assigned to SR 874 appears low, leading the analysis to conclude that SR 874 is not an 'impacted roadway' under the 5.0% significance threshold, which defines an impact as project traffic equal to or exceeding 5% of the adopted PM peak-hour maximum service volume.

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

Follow up comment: Although updated Table 21.E.1 shows a slight increase in the SR 874/Don Shula Expressway southbound estimated trips for a total of 146 and 175 vph (compared to 125-150 southbound trips of the first version). These numbers of trips still seem low. No analysis update addressing previous comment was provided

3. The applicant must provide all the SERPM model files for the project trip assignments review that were used to determine compliance with this 5.0% rule provided in Table 21.A.2.

Follow up comment: Although the applicant provided additional SERPM information in Appendix 21-5, no details were provided regarding the procedure used to distribute the volumes and determine compliance with the 5.0% rule. SERPM model map on page 363 of the Appendix does not provide a legend for the different colors shown on the map.

4. The applicant did not conduct an AM peak-hour analysis, which is essential for evaluating potential traffic impacts on local roads and adjacent neighborhoods, particularly given the presence of a middle school and an elementary school located three blocks apart along SW 144th Street. Without this analysis, the study cannot adequately assess congestion or operational issues on the existing roadway network that would serve the proposed development. Additionally, little to no information is provided on the traffic impacts to key access roadways, including SW 162nd Avenue, SW 157th Avenue, SW 144th Street, and SW 152nd Street. The final transportation analysis must include a comprehensive AM peak-hour assessment and complete impact evaluation of these roadways.

The methodology should also require the AM peak hour assessment.

Follow up comment: No analysis for the AM peak hour was provided.

5. The proposed development includes three access points across the CSX rail tracks (Map J-G1). However, the analysis does not include a scenario without these crossings to assess potential impacts on the remaining access points and the existing connecting roadway network.

Follow up comment: No additional scenario without the access points over the CSX rail tracks was provided. As shared during the April 14th, 2026, meeting, SW 162nd Avenue does not connect to SW 136th Street. Therefore, additional scenarios should be considered to account for the possibility that access points over the CSX rail tracks are not feasible. This means that direct access to the development would need to rely on the existing arterial grid. The impact on existing arterials under this scenario is not documented.

6. The PM peak period of 4 PM to 6 PM used in the traffic impact analysis does not reflect actual peak conditions in the southwest area of the county, where congestion typically extends beyond 7 PM.

Follow up comment: Turning movement counts were collected for 16 intersections between 4:00 and 6:00 pm. No analysis update addressing previous comment was provided

7. The projected increases in traffic on existing local roadways providing direct access to the proposed development, such as SW 162nd Avenue south of SW 136th Street (12–25 additional PM peak trips), SW 157th Avenue south of SW 136th Street (250 additional trips), and SW 136th Street (175 additional trips) appear unreasonably low. Given the scale of the proposed development, these estimates likely underestimate the true traffic impacts on the local roadway network.

Follow up comment: Traffic volumes listed in the previous comment are still within the same range on this second version of the DRI submitted in March 2026. No analysis update addressing previous comment was provided

8. SW 144th Street, with is the only existing access to the proposed development from the east, was not included in the analysis. SW 144th Street and SW 157th Avenue would serve as the only eastern access points to the development. Both roadways provide primary access to established residential communities and experience significant congestion during the AM peak period, which was not evaluated in the study.

Follow up comment: The analysis of the SW 144th Street & SW 157th Avenue intersection was not considered in the intersection analysis. Also, the intersection of SW 144th Street and SW 162nd Avenue should be included. These two intersections will be the most impacted if the access points over the CSX rail tracks are not implemented. No analysis update addressing previous comment was provided

Comments on the March version of the DRI

9. The adopted LOS standard for SR 874/Don Shula Expressway shows D for the segment for the segment between HEFT and SW 104th Street; however, for the segment between SW 104th Street and SR 878 shows E+20. SR 874/Don Shula Expressway is a state road/limited access facility, managed by GMX. The FDOT (State) LOS standard should be used for this corridor, the County LOS standard of E+20 is not applicable.
10. The report does not provide an analysis for the intersections (SW 128th Street & SW 137th Avenue and SW 128th Street & SW 127th Avenue) leading to/coming from SR 874/Don Shula Expressway
11. The report does not indicate the specific version of the SERPM model used for developing traffic projections.
12. Map J-E1 shows the Project Trip Distribution, it shows access to the development through SW 136th Street, the CSX rail tracks are located just south of SW 136th Street which will prevent direct access into the development from SW 136th Street. Please ensure that access through the rail tracks is feasible.

Comments on the March version of the DRI – Appendices

13. Page 20 (pdf)/Page 18 (report) → It seems that page 19 is missing. The page numbering is not continuous it goes from 18 to 20.
14. Page 300 (pdf), table titled → Linear and Exponential Growth Rate Calculation Summary. No estimated growth rate is listed for SR 874/Don Shula Expressway.
15. Page 357 (pdf)→ Please include title for the table. In addition, include reference to roadways names that correlate with the Nodes listed in the table.

Conclusion

1. The submittal **does not** meet the definition of “**sufficient**” per Rule 73C-40.022(3)(a), F.A.C., as it does not provide information adequate for reviewing agencies to fully assess transportation impacts.

2. Although no trips were assigned to the future Kendall Parkway/SR 836 Southwest Extension, GMX requests continued coordination for information and planning consistency as the site development process advances.

Follow up comment: The submittal does not meet the definition of “sufficient” per Rule 73C-40.022(3)(a), F.A.C., as it didn’t address previous comments and does not provide updated information adequate for reviewing agencies to fully assess transportation impacts.

Meeting Notes

Meeting: City Park Development of Regional Impact (DRI) - ADA2 comments by GMX

Date: May 6, 2026

Location: virtual

Attendees: Christina Miskis (SFRPC) Thuha Nguyen (Viaplanning), Mayra Diaz (GMX), Ytve Guerrera (GMX-GEC), Govardhan Muthyalagari (GMX-GEC)

Follow up comment on Traffic Distribution

The review of information presented by the applicant requires the reviewers to have access to the files used to support the travel demand forecasting and trip distribution analysis for the City Park development. GMX did not have access to the Southeast Regional Planning Model (SERPM) files. In addition, GMX requests detailed documentation describing the assumptions, methodologies, and data sources used to develop the proposed trip distribution.

The assumptions underlying the applicant's trip distribution analysis should have been validated using the SERPM model to ensure the estimated distribution is reasonable and supportable. In other words, the applicant could have reasonably relied on SERPM Cardinal Distributions from adjacent, developed traffic analysis zones (TAZs) with comparable regional characteristics to estimate initial number of trips and distribution for the proposed development.

GMX possesses extensive knowledge of the area surrounding the City Park development due to its involvement with future projects and the maintenance of limited-access facilities serving the area, including SR 874. Based on observation of travel patterns, significant directionality occur during peak periods from Southwest Kendall to elsewhere in the County indicating a clear and consistent regional commuting pattern.

The demographic characteristics of Southwest Kendall further support this observed travel behavior. According to a prior study conducted by Florida International University, this area is among the most highly educated in Miami-Dade County. The resident population largely consists of professionals who routinely commute outside the area to access employment opportunities aligned with their skills and educational background. This demographic profile directly explains why a substantial proportion of trips generated in Southwest Kendall are outbound.

In contrast, local employment opportunities within the Kendall area are predominantly concentrated in retail and service sectors, which generally do not align with the

professional composition of the local workforce. As a result, regardless of the size or intensity of the proposed mixed-use development, it is unlikely that on-site employment would meaningfully reduce outbound commuter traffic.

Given these considerations, GMX respectfully requests the additional information noted above to allow for a more comprehensive and informed assessment of the transportation impacts associated with the proposed development.

From: [South Florida Local Gov Plan](#)
To: [SFRPC Admin](#)
Cc: [Cruz, Ibel](#)
Subject: RE: Reminder – City Park DRI ADA2 Sufficiency Review Comments Due April 22
Date: Wednesday, April 22, 2026 1:43:45 PM
Attachments: [image008.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)

Good afternoon Ms. Lerch,

The South Florida Water Management District (District) has completed its first round of review for sufficiency of the Application for Development Agreement (ADA) for City Park Development of Regional Impact (DRI) project submitted by the South Florida Planning Regional Planning Council (SFRPC) on November 5, 2025. Pursuant to §380.06(10), Florida Statutes, the District determined the application to be sufficient.

District staff have no further comment for this second round of sufficiency review. For assistance or additional information, please contact SFLOCALGOVPLAN@sfwmd.gov.



Stephanie Reed

Policy and Planning Analyst

Water Supply Implementation

South Florida Water Management District

Office: 561-682-6715 **Email:** sreed@sfwmd.gov

3301 Gun Club Road, West Palm Beach, FL 33406

From: SFRPC Admin <sfadmin@sfrpc.com>
Sent: Tuesday, April 21, 2026 12:18 PM
To: rsgarcia@gmx-way.com; mdiaz@mdxway.com; Cdiaferia@gmx-way.com; aberisiartu@gmx-way.com; gmuthyalagari@hntb.com; yguerrera@hntb.com; kebrown@hntb.com; aileen.boucle@mdtpo.org; oscar.camejo@mdtpo.org; Maria.Vilches@miamidade.gov; Christopher.Rosenberg@miamidade.gov; Franchesca.Taylor@miamidade.gov; Vanessa.Spatafora@miamidade.gov; South Florida Local Gov Plan <SFLOCALGOVPLAN@sfwmd.gov>; Maran, Ana Carolina <cmaran@sfwmd.gov>; Reed, Stephanie <sreed@sfwmd.gov>; Reed, Stephanie <sreed@sfwmd.gov>; jcabaleiro@contractor.usgs.gov; adam_gelber@ios.doi.gov; Williams, Larry O <larry_williams@fws.gov>; Kim Samson - Turnpike <Kim.Samson@dot.state.fl.us>; Kavouklis, Katina <katina.kavouklis@dot.state.fl.us>
Subject: FW: Reminder – City Park DRI ADA2 Sufficiency Review Comments Due April 22
Importance: High

[Please remember, this is an external email]

Dear Federal, State, Regional, and Local Agency Partners,

This is a friendly reminder that agency comments regarding the sufficiency review of the City Park DRI ADA2 are due by **Wednesday, April 22, 2026**.

As noted in our prior correspondence, agencies are requested to review the ADA2 materials, the Agreement to Delete, and SIN1, available at the following link:

<https://sfregionalcouncil.org/city-park-dri-review-materials/>

Action Requested:

Please have your agency's designated representative submit a written recommendation on sufficiency by the April 22 deadline, including:

- Whether the ADA meets or does not meet sufficiency; and
- If not sufficient, the basis and any explanatory comments.

Please submit recommendations concurrently to:

- SFRPC: sfadmin@sfrpc.com
- Applicant: GPENN@BRZONINGLAW.COM

We appreciate your coordination and timely input to support an efficient review process. As a reminder, SFRPC is scheduled to issue its formal sufficiency determination on May 7, 2026.

If you have any questions regarding the review process or materials, please feel free to reach out.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | klerch@sfrpc.com



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From: [Plan_Review](#)
To: [SFRPC Admin](#)
Cc: GPENN@BRZONINGLAW.COM
Subject: RE: Reminder – City Park DRI ADA2 Sufficiency Review Comments Due April 22
Date: Wednesday, April 22, 2026 6:35:09 PM
Attachments: [image010.png](#)
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[image012.png](#)
[image013.png](#)
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[image015.png](#)

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Good afternoon,

The Florida Department of Environmental Protection has reviewed the provided materials and finds the City Park DRI ADA2 to be sufficient. We appreciate the opportunity to review and please let me know if you need anything further.

Thank you,

Lindsay Weaver



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

From: SFRPC Admin <sfadmin@sfrpc.com>
Sent: Tuesday, April 21, 2026 12:03 PM
To: Andreotta, Jason <Jason.Andreotta@FloridaDEP.gov>; Blandin, Norva <Norva.Blandin@FloridaDEP.gov>; Moore, Jon W <Jon.W.Moore@FloridaDEP.gov>; Weaver, Lindsay <Lindsay.Weaver@FloridaDEP.gov>; Davila, Sirena <Sirena.Davila@FloridaDEP.gov>; Pupa, Diane <Diane.Pupa@FloridaDEP.gov>; Hurd, Jacqueline <Jacqueline.Hurd@FloridaDEP.gov>; Marion, Krista <Krista.Marion@FloridaDEP.gov>; Plan_Review <Plan.Review@FloridaDEP.gov>; compplans@freshfromflorida.com; Lauren.Fillyaw@fdacs.gov; Kathy.Mears@fdacs.gov; shereen.yeefong@dot.state.fl.us; daniel.iglesias@dot.state.fl.us; ken.jeffries@dot.state.fl.us; Carver, Jennifer <Jennifer.Carver@dot.state.fl.us>; John.McWilliams@kimley-horn.com; Dat.Huynh@dot.state.fl.us; Eric.Penfield@exp.com
Subject: Reminder – City Park DRI ADA2 Sufficiency Review Comments Due April 22
Importance: High

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments,

clicking links, or responding to this email.

Dear Federal, State, Regional, and Local Agency Partners,

This is a friendly reminder that agency comments regarding the sufficiency review of the City Park DRI ADA2 are due by **Wednesday, April 22, 2026**.

As noted in our prior correspondence, agencies are requested to review the ADA2 materials, the Agreement to Delete, and SIN1, available at the following link:

<https://sfregionalcouncil.org/city-park-dri-review-materials/>

Action Requested:

Please have your agency's designated representative submit a written recommendation on sufficiency by the April 22 deadline, including:

- Whether the ADA meets or does not meet sufficiency; and
- If not sufficient, the basis and any explanatory comments.

Please submit recommendations concurrently to:

- SFRPC: sfadmin@sfrpc.com
- Applicant: GPENN@BRZONINGLAW.COM

We appreciate your coordination and timely input to support an efficient review process. As a reminder, SFRPC is scheduled to issue its formal sufficiency determination on May 7, 2026.

If you have any questions regarding the review process or materials, please feel free to reach out.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | klerch@sfrpc.com



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From: [Garcia, Jeannette C.](#)
To: [SFRPC Admin](#)
Cc: [Concurrency Management](#); [RODRIGUEZ, IVAN M](#); [Simon, Nathaly](#)
Subject: RE: Reminder – City Park DRI ADA2 Sufficiency Review Comments Due April 22
Date: Tuesday, April 21, 2026 2:36:40 PM
Attachments: [image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[SFRPCMemoSufficiencySIN1_11_26_SchoolsDEM-Response 11-5-25 IMR.pdf](#)

Good afternoon,

The School District's response remains the same which was issued on November 5, 2025, by Mr. Ivan M. Rodriguez, Director of Growth Management. Please see attached memo, Applicant letter, and School Concurrency Analysis directed to the Applicant.

Should you have any questions, please feel free to contact me at 305-995-3062.

Sincerely,

Jeannette C. Garcia

Executive Director

Growth Management

Office of Governmental Affairs & Land Use
Facilities Design and Construction
Miami-Dade County Public Schools

From: SFRPC Admin <sfadmin@sfrpc.com>

Sent: Tuesday, April 21, 2026 12:16 PM

To: ARECHAVALA, DENNIS I <DENNISARECHAVALA@dadeschools.net>; RODRIGUEZ, IVAN M <IRodrigu@dadeschools.net>; Garcia, Jeannette C. <jcgarcia1@dadeschools.net>; HERRERA, ANA I <anah732@dadeschools.net>; Simon, Nathaly <NSimon1@dadeschools.net>; director@miami-airport.com; ArlynRull@miami-airport.com; AFinol@miami-airport.com; talbertC@miccosukeetribе.com; beverlyt@miccosukeetribе.com; marlap@miccosukeetribе.com; curtis@miccosukeetribе.com; marcellusosceola@semtribe.com; CEOsceola@miccosukeetribе.com; edwardo@miccosukeetribе.com

Subject: Reminder – City Park DRI ADA2 Sufficiency Review Comments Due April 22

Importance: High

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Dear Federal, State, Regional, and Local Agency Partners,

This is a friendly reminder that agency comments regarding the sufficiency review of the City Park DRI ADA2 are due by **Wednesday, April 22, 2026**.

As noted in our prior correspondence, agencies are requested to review the ADA2 materials, the Agreement to Delete, and SIN1, available at the following link:

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Action Requested:

Please have your agency's designated representative submit a written recommendation on sufficiency by the April 22 deadline, including:

- Whether the ADA meets or does not meet sufficiency; and
- If not sufficient, the basis and any explanatory comments.

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- SFRPC: sfadmin@sfrpc.com
- Applicant: GPENN@BRZONINGLAW.COM

We appreciate your coordination and timely input to support an efficient review process. As a reminder, SFRPC is scheduled to issue its formal sufficiency determination on May 7, 2026.

If you have any questions regarding the review process or materials, please feel free to reach out.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council

1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020

954.924.3653 (o) | klerch@sfrpc.com



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

Dear Applicant,

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

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

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

Best regards,



Ivan M. Rodriguez

Director

Growth Management

Office of Governmental Affairs & Land Use

Facilities Design and Construction

Miami-Dade County Public Schools

1450 N.E. Second Avenue

Miami, Florida 33132

(305) 995-4501



Miami-Dade County Public Schools

giving our students the world

Superintendent of Schools

Dr. Jose L. Dotres

November 5, 2025

VIA ELECTRONIC MAIL

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

Miami-Dade County School Board

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

RE: PRELIMINARY SCHOOL CONCURRENCY ANALYSIS FOR CITY PARK DRI

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

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

Dear Applicant,

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

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

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

Best regards,



Ivan M. Rodriguez, Director

IMR:ir
L-079
Enclosure

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

Governmental Affairs & Land Use

School Board Administration Building • 1450 N.E. 2nd Avenue • Miami, Florida 33132

305-995-1000 • www.dadeschools.net



Concurrency Management System (CMS)

Miami-Dade County Public Schools

Miami-Dade County Public Schools

Concurrency Management System

Preliminary Concurrency Analysis

MDCPS Application Number: **PH3025102700636** Local Government (LG): **Miami-Dade**
 Date Application Received: **10/27/2025 3:24:07 PM** LG Application Number: **z2025000222**
 Type of Application: **Public Hearing** Sub Type: **Redevelopment**

Applicant's Name: **Parkland West LLC, ET AL**
 Address/Location: **SW 136 Street to the north, SW 162 Avenue to the east, SW 152 Street to the south, and SW 177 Avenue to the west.**
 Master Folio Number: **3059200000040**
 Additional Folio Number(s): **3059200000050, 3059190000012, 3059190000010, 3059200000030, 3059200000210, 3059190000020, 3059200000031, 3059200000080, 3059200000070, 3059190000011.**

PROPOSED # OF UNITS **7800**
 SINGLE-FAMILY DETACHED UNITS: **1029**
 SINGLE-FAMILY ATTACHED UNITS: **0**
 MULTIFAMILY UNITS: **6771**

CONCURRENCY SERVICE AREA SCHOOLS

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

ADJACENT SERVICE AREA SCHOOLS

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

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

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

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

From: [DiGruttolo, Laura](#)
To: [Kathe Lerch](#)
Cc: [Colletier, Nicolas](#); [Baysinger, Samantha](#); [Conservation Planning Services](#)
Subject: RE: Request for Sufficiency Review – City Park DRI ADA2 (Due April 22, 2026)
Date: Thursday, April 16, 2026 4:32:06 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Dear Ms. Lerch:

Florida Fish and Wildlife Conservation Commission (FWC) staff reviewed the second Application for Development Approval (ADA2) for the proposed City Park Development of Regional Impact in accordance with our authorities under Chapter 379, Florida Statutes. We find the ADA2 sufficient, and we have no comments, recommendations, or objections related to listed species and their habitat or other fish and wildlife resources to offer at this time.

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

Sincerely,

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

City Park DRI_64110

From: Kathe Lerch <klerch@sfrpc.com>
Sent: Monday, March 23, 2026 4:18 PM
To: Conservation Planning Services <conservationplanningservices@MyFWC.com>; DiGruttolo, Laura <Laura.DiGruttolo@MyFWC.com>; Gruver, Pamela <Pamela.Gruver@MyFWC.com>; Baysinger, Samantha <Samantha.Baysinger@MyFWC.com>; Colletier, Nicolas <Nicolas.Colletier@MyFWC.com>; Cucinella, Josh <Josh.Cucinella@MyFWC.com>; CompliancePermits@dos.myflorida.com; Michael.DuBose@dos.fl.gov; ethan.putman@dos.fl.gov; archlgcl@bellsouth.net; lawrence.ventura@us.af.mil; jjones@marstel-day.com
Subject: Request for Sufficiency Review – City Park DRI ADA2 (Due April 22, 2026)

[EXTERNAL SENDER] Use Caution opening links or attachments

Dear Federal, State, Regional, and Local Agency Partners,

On March 23, 2026, the Applicant (Parkland West, LLC, et al.) submitted the second Application for Development Approval (ADA2) to the South Florida Regional Planning Council (SFRPC).

ADA2 reflects the applicant's responses to the executed Agreement to Delete and incorporates a reduction of 75,251 square feet of retail (from 749,153 to 673,902 SF) as well as responses to prior agency comments (Statement of Information Needed-1). Agencies are requested to review the ADA2 materials, the Agreement to Delete, and SIN1:

<https://sfregionalcouncil.org/city-park-dri-review-materials/>

Action Requested:

Please have your agency's designated representative submit a written recommendation on **sufficiency** by **Wednesday, April 22, 2026**:

- Indicate whether the ADA **meets or does not meet sufficiency**; and
- If not sufficient, provide the basis and any explanatory comments.
-

Please send recommendations concurrently to:

- SFRPC: sfadmin@sfrpc.com
- Applicant: GPENN@BRZONINGLAW.COM
-

SFRPC will issue its formal sufficiency determination on May 7, 2026.

Per Rule 73C-40, F.A.C., sufficiency is met when information is provided in a manner that allows agencies to assess impacts; it does not imply agreement with conclusions. Additional information requests should be limited to clarifications or new issues directly arising from submitted materials. Comments and questions not referenced or included within SIN1 may not be used by the Council as the basis for additional sufficiency questions and may be answered solely at the applicant's discretion.

For questions regarding the sufficiency review process or DRI procedures, please contact sfadmin@sfrpc.com.

Thank you for your coordination.

Kathe Ann Lerch

Director of Administration

South Florida Regional Planning Council
1 Oakwood Boulevard, Suite 250, Hollywood, FL 33020
954.924.3653 (o) | klerch@sfrpc.com



South Florida Regional Planning Council

Proudly serving South Florida since 1974



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



Florida Power & Light Company

May 1, 2026

Rob Curtis
The Curtis Group
7520 Red Road
South Miami, FL 33143

Re: Service Availability for **City Park** located at
V/O SW 136th ST & SW 177th AVE, Miami FL, 33196.
Including the following Folios: 30-5920-000-0040, 30-5920-000-0080, 30-5920-000-0070
30-5920-000-0030, 30-5920-000-0050, 30-5920-000-0210, 30-5919-000-0010,
30-5919-000-0011, 30-5919-000-0012, 30-5920-000-0031, 30-5919-000-0020

Dear Rob Curtis:

Thank you for contacting FPL early in your planning process. At the present time FPL has sufficient capacity to provide electric service to your property. We have facilities available currently available at this location.

Please advise me early in the planning process once the final plans have been approved. This information will help us to provide you with the best service in accordance with applicable rates, rules and regulations. You may also respond to us through www.fpl.com. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Jose Palomo'. The signature is fluid and cursive, with the first and last names clearly legible.

Jose Palomo

Construction Project Manager

From: [Stephen Olmsted \(BPD\)](#)
To: [Isabel Cosio Carballo](#); [Kathe Lerch](#); [Bell, Jerry \(RER\)](#); [Graham Penn <gpenn@brzoninglaw.com>](#)
Subject: Village of Pinecrest - City Park DRI - Comments and Request for Additional Information
Date: Wednesday, April 22, 2026 2:30:09 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[City Park DRI SFRPC Comments 20251205.pdf](#)
Importance: High

Good afternoon –

Regarding the proposed City park DRI, the Village of Pinecrest continues to express concerns related to traffic impacts and loss of farmland. Review comments are attached.

If you have questions or require additional information, please let me know.

Sincerely,



Stephen R. Olmsted, AICP

Planning Director

Village of Pinecrest

12645 Pinecrest Parkway

Pinecrest, Florida 33156

305.234.2121

www.pinecrest-fl.gov



From: Stephen Olmsted (BPD)
Sent: Friday, December 5, 2025 11:18 AM
To: [isabelc@sfrpc.com](#); [klerch@sfrpc.com](#)
Cc: [jerry.bell@miamidade.gov](#)
Subject: Village of Pinecrest - City Park DRI - Comments and Request for Additional Information
Importance: High

Dear Ms. Cosio Carballo –

Please find attached the Village of Pinecrest's request for additional information related to the application for review and consideration of the proposed City Park Development of Regional Impact (DRI).

If you have questions or require additional information , please let me know.

Sincerely,

Stephen R. Olmsted, AICP

Planning Director

Village of Pinecrest



12645 Pinecrest Parkway
Pinecrest, Florida 33156
305.234.2121
www.pinecrest-fl.gov



PINECREST

Building and Planning Department

December 5, 2025

Ms. Isabel Cosio Carballo, Executive Director
South Florida Regional Planning Council
1 Oakwood Boulevard, Suite 250
Hollywood, FL 33020

Re: City Park DRI

Dear Ms. Cosio Carballo

In follow-up to our recent conversation, the Village of Pinecrest respectfully requests additional information related to the application for consideration and review of the proposed **City Park Development of Regional Impact (DRI)**, a 960-acre project that includes approximately 7,600 new residential units and is planned for development on currently productive prime farmland. Given the scale and location of the project, I am seeking further clarification on its potential impacts on the Village of Pinecrest, both in terms of public infrastructure and regional food systems. Specifically, the Village of Pinecrest requests the following additional information:

1. **Transportation Impacts on Pinecrest**

- Detailed analysis of the anticipated traffic generation associated with the City Park DRI and its projected effects on Pinecrest's adopted roadway Levels of Service (LOS).
- Any modeling or technical memoranda addressing traffic diversion, peak-hour impacts, concurrency evaluations, and mitigation measures.
- Identification of roadways within or adjacent to Pinecrest expected to experience LOS degradation and any proposed improvements intended to maintain or restore adopted standards.

A copy of the Village of Pinecrest's concurrency management requirements, including transportation concurrency requirements, excerpted from Chapter 30 the Village's Code of Ordinances, is attached. Applicable text is highlighted in yellow.

2. **Loss of Prime Farmland and Food Supply Implications**

- Documentation on the current agricultural productivity of the 960 acres proposed for development, including crop types, yields, and economic value.
- Assessment of how the conversion of this farmland may affect the regional and local food supply, including potential long-term impacts on food availability, food security, and the agricultural economy of South Florida.
- Description of any farmland preservation, mitigation, or compensation strategies being considered, in addition to the inclusion of a 10 acre "community farm" in the proposed site plan.

Given the magnitude and regional significance of this project, a thorough understanding of these issues is essential for evaluating the potential consequences to surrounding communities, including Pinecrest, as well as to South Florida's agricultural resources.

I appreciate the South Florida Regional Planning Council's attention to these issues and respectfully ask that this request for information be included in the South Florida Regional Planning Council's current or subsequent Statement of Information Needed, and that the applicants otherwise be asked and required to provide the requested assessment.

Thank you for your consideration of our request for additional information. If you have questions or require additional information, please let me know.

Sincerely,



Stephen R. Olmsted, AICP
Planning Director

C/ Joseph M. Corradino, Mayor
Yocelyn Galiano, ICMA-CM, Village Manager
Chad Friedman, Village Attorney
Jerry Bell, Assistant Director of Planning, Miami-Dade County
Kathe Lerch, Director of Administration, SFRPC

Village of Pinecrest, Florida

Code of Ordinances, Chapter 30, Land Development Regulations

Div. 5.21. Concurrency management.

- (a) *Purpose and intent.* Concurrency refers to a finding that public facilities and services necessary to support a proposed development are available, or will be made available, concurrent with the impacts of the development. The concurrency management system is intended to provide a systematic process for the review and evaluation of all proposed development for its impact on concurrency facilities and services, as required by the Local Government Comprehensive Planning and Land Development Regulation Act, F.S. ch. 163, Part II, and F.A.C. Rule 9J-5.0055. Facilities in the village that are subject to these regulations include potable water, recreation, sanitary sewer, solid waste, drainage, and roads. The purpose of this concurrency management system is to ensure that development orders and permits are conditioned on the availability of concurrency facilities and services, which meet adopted level of service requirements identified in this concurrency management system (CMS). The CMS is also intended to describe the requirements and procedures for determining consistency of proposed development with the comprehensive development master plan.
- (b) *Consistency with village comprehensive development master plan.* All development applications shall demonstrate compliance with the comprehensive development master plan as well as with all applicable provisions of the land development code. Further, development applications shall demonstrate that specified concurrency facilities shall be available at prescribed levels of service concurrent with the impact of the development of those facilities. A development order shall be permitted only if the final development plan complies with the goals, objectives and policies established in the comprehensive development master plan.
- (c) *Applicability and exemptions.* All applications for development orders shall be subject to concurrency review unless specifically exempted below. However, in no case shall a development order be issued for a minimum threshold project which would impact a concurrency facility for which a moratorium or deferral on development has been placed.
 - (1) *Projects below the minimum threshold.* The following development shall be exempt from concurrency review:
 - a. Residential projects which would result in the creation of one single-family dwelling or one two-family dwelling, as well as projects that entail structural alterations, including room additions to single-family structures, which do not change the land use.
 - b. Construction of residential or nonresidential accessory buildings and structure, which do not create additional public facility demand.
 - c. Actions administered through development orders and other development which do not increase demand on concurrency facilities, such as grading or land excavation or structural alterations which do not include a change of use and satisfy provisions of a. and b. above.
 - (2) *Vested projects.* Projects that have valid final development orders or building permits prior to November 27, 2000, or any subsequent amendment to the land development code shall be considered vested and therefore exempt from concurrency management. This shall include the following:
 - a. Any project for which a valid building permit has been issued and has not expired; and

-
- b. All vacant lots in single-family detached, single-family attached and two-family subdivisions which were lawfully platted in accordance with the village land development code and recorded prior to November 27, 2000; and
 - c. Approved developments of regional impact with a development order that has not expired; and
 - d. Any project which has obtained a determination of vested rights upon appeal to village council.
- (3) *Redevelopment projects.* Proposed redevelopment shall be credited for the existing demand on available capacity. If a redevelopment project generates in excess of the existing demand which it is replacing, a concurrency review shall be required; however, the concurrency review shall only address the amount by which the proposed demand generated exceeds the demand of existing development. The development plan for redevelopment must be submitted no more than one year after the prior use is discontinued in order to qualify for a concurrency credit. If the proposed redevelopment generates equal or less demand than the existing project, the applicant shall be given a concurrency credit enabling the applicant to reserve the unused capacity. The concurrency credit will expire within five years of the change or discontinuance of the use. The applicant's submission of an application for a demolition permit shall also initiate a concurrency review for the express purpose of issuing credits for redevelopment.
- (4) *Public facilities.* Public facilities to ensure the protection of the health, safety and general welfare of the citizens of the village, including public schools (pre-kindergarten through twelfth grade), shall be exempt from concurrency review. This shall include all public facility construction projects included in the village capital improvements program required to meet any adopted level of service standard.
- (d) *Criteria for concurrency and final development orders.* A final development order shall not be granted for a proposed development unless the village finds that adequate capacity for concurrency facilities exists at or above adopted level of service in order to accommodate the impacts of the proposed development or that improvements necessary to bring concurrency facilities up to their adopted level of service will be in place concurrent with the impacts of the development.
- (1) *Sanitary sewer, potable water, solid waste and drainage.* For sanitary sewer, potable water, solid waste, and drainage facilities, the village shall find that the following criteria have been met in order for a proposed development to be found in compliance with concurrency management requirements:
- a. A development order is issued subject to the condition that, at the time of the issuance of a certificate of occupancy or its functional equivalent, the facilities and services are in place and available to serve the new development; or
 - b. At the time a development order or permit is issued, the necessary facilities and services are guaranteed, in an enforceable development agreement pursuant to F.S. § 163.3220, or an agreement or development order issued pursuant to F.S. ch. 380, to be in place and available to serve new development at the time of the issuance of a certificate of occupancy or its functional equivalent.
- (2) *Parks and recreation.* For parks and recreation facilities, at a minimum, the village shall find that the following criteria have been met in order for a development to be found in compliance with concurrency management requirements:
- a. At the time the development order is issued, the necessary facilities and services are in place or under actual construction; or
 - b. A development order is issued subject to the condition that, at the time of the issuance of a certificate of occupancy, the acreage for the necessary facilities and services to serve the new development is dedicated or acquired by the village, or funds in the amount of the developer's fair share are committed; and

-
- i. A development order is issued subject to the condition that the necessary facilities and services needed to serve the new development are scheduled to be in place or under actual construction not more than one year after issuance of a certificate of occupancy as provided in the village capital improvements program; or
 - ii. At the time the development order is issued, the necessary facilities and services are the subject of a binding executed agreement which requires the necessary facilities and services to serve the new development to be in place or under actual construction not more than one year after issuance of a certificate of occupancy; or
 - iii. At the time the development order is issued, the necessary facilities and services are guaranteed, in an enforceable development agreement pursuant F.S. § 163.3220, or an agreement or development order issued pursuant to F.S. ch. 380, to be in place or under actual construction not more than one year after issuance of a certificate of occupancy.
- (3) **Transportation facilities.** For transportation facilities (roads and mass transit designated in the adopted comprehensive development master plan), at a minimum, the village shall ensure that the following standards are met to satisfy concurrency requirements, unless state authorized exceptions are enacted by the village and duly approved by the state:
- a. At the time the development order is issued, the necessary facilities and services are in place or under actual construction; or
 - b. A development order is issued subject to the condition that the necessary facilities and services needed to serve the new development are scheduled to be in place or under actual construction not more than three years after issuance of a certificate of occupancy as provided in the village five-year capital improvements program. The capital improvement program may recognize and include transportation projects included in the first three years of the adopted state department of transportation five-year work program. The capital improvements element includes the following policies:
 - i. The estimated date of commencement of actual construction and the estimated date of project completion.
 - ii. A provision that a plan amendment is required to eliminate, defer, or delay construction of any road or mass transit facility or service which is needed to maintain the adopted level of service standard and which is listed in the five-year capital improvements program;
 - c. At the time the development order is issued, the necessary facilities and services are the subject of a binding executed agreement which requires the necessary facilities and services to serve the new development to be in place or under actual construction not more than three years after issuance of a certificate of occupancy; or
 - d. At the time the development order is issued, the necessary facilities and services are guaranteed, in an enforceable development agreement pursuant to F.S. § 163.3220, or an agreement or development order issued pursuant to F.S. ch. 380, to be in place or under actual construction not more than three years after issuance of a certificate of occupancy; or
 - e. For the purpose of issuing a development order, a proposed development may be deemed to have a minimal impact and may not be subject to the transportation concurrency requirements, only if all the following conditions are met:
 - i. The development proposal is for an increase in density or intensity of less than or equal to twice the density or intensity of the existing development, or for the development of a vacant parcel of land at a residential density of less than four dwelling units per acre or, for nonresidential uses, at an intensity of less than 0.1 floor area ratio. Isolated vacant lots in

-
- predominantly built residential areas where construction of a single-family house would be the most suitable use may be developed for single-family residential use under the minimal impact exception even if smaller than one quarter acre in size.
- ii. The transportation impact of the proposed development alone does not exceed 0.1 percent of the maximum service volume at the adopted level of service standard for peak hour of the affected transportation facility.
 - iii. The cumulative total transportation impact from the minimal impact exception does not exceed three percent of the maximum service volume at the adopted level of service standard of the affected transportation facility if the proposed development does not meet the minimum level of service standard.
 - iv. The village has adopted within its comprehensive development master plan policies for granting such exemptions.
- f. Proportionate fair-share: A development that has been notified of a lack of capacity to satisfy transportation concurrency on a transportation facility in the village's concurrency management system, including transportation facilities maintained by FDOT or another jurisdiction that are relied upon for concurrency determinations may petition the village council for approval of a proportionate fair-share agreement. The proportionate fair-share program does not apply to developments of regional impact (DRIs) using proportionate fair-share under section 163.3180(12), F.S., or to developments exempted from concurrency as provided in section 163.3180, F.S., regarding exceptions and de minimis impacts.
- i. Proportionate fair-share mitigation for concurrency impacts may include, without limitation, separately or collectively, private funds, contributions of land, and construction and contribution of facilities.
 - ii. A development shall not be required to pay more than its proportionate fair-share.
 - iii. The methodology used to calculate an applicant's proportionate fair-share obligation shall be as provided for in section 163.3180(12), F. S.
- (e) *Concurrency administration.* The administrative official shall be responsible for concurrency reviews as required by this concurrency management system. The administrative official in conjunction with other village staff shall determine whether adequate capacities for concurrency facilities are available to satisfy the demands of each proposed development. The concurrency management flow chart provides a graphic summary of the administrative process.
- (1) *Application for concurrency review.* Concurrency review shall be initiated upon submission and acceptance of an application for a development plan approval, preliminary subdivision plat, or a building permit, whichever first occurs. At the request of the applicant and pursuant to payment of a concurrency review fee as may be established by resolution of the village council, or the administrative official in concert with other staff may render concurrency findings.
 - (2) *Project impact assessment.* The administrative official shall use the best available information to establish and evaluate existing capacities for concurrency facilities. The applicant shall be responsible for supplying the anticipated land uses, densities and/or intensities, of a proposed development and the anticipated date of completion of proposed development. The administrative official shall assess the anticipated impacts of the proposed development on concurrency facilities.
 - (3) *Project phasing/timing of improvements.* Concurrency facilities associated with a phased development may also be phased. However, all concurrency facilities necessary to accommodate the impacts of each phase must be available or a schedule for the acquired improvements must be approved prior to the issuance of a development order. The schedule of facility improvements shall ensure that all facility

-
- improvements necessary to accommodate the impacts of the development (or portion thereof) for which a certificate of occupancy has been applied shall be in place prior to the issuance of the certificate. Under no circumstances shall the final certificate of occupancy be issued for a project unless all required facility improvements required by the development order or development agreement have been completed.
- (4) *Development agreements.* If the minimum requirements for concurrency cannot be met, concurrency may be achieved by guaranteeing necessary facility improvements in an enforceable development agreement. Said development agreement may include guarantees to construct required facility improvements or to provide funds equivalent to the cost of providing such facility improvements.
- (5) *Concurrency review determination.* Upon the conclusion of the concurrency review, the administrative official or designee shall prepare a written determination concerning the proposed development. This determination shall address, but is not limited to:
- a. The anticipated public facility impacts of the proposed development;
 - b. The ability of existing facilities to accommodate the proposed development at the adopted level of service standards;
 - c. Any existing facility deficiencies that will need to be corrected prior to the completion of the proposed development;
 - d. The facility improvements or additions necessary to accommodate the impact of the proposed development at the adopted level of service standards and the entities responsible for the design and installation of all required facility improvements or additions; and
 - e. The date such facility improvements or additions will need to be completed to be concurrent with the impacts on such facilities created by the proposed development.
- (6) *Concurrency denials.* In the event that the village concurrency review reveals that the proposed development would generate public facility impacts beyond that which can be absorbed by available capacity, the village shall determine whether there is a financial or other legally binding commitment to ensure that public facilities necessary to correct the anticipated deficiency will be in place concurrent with the impacts of the proposed development. If the village and/or a developer are unable to provide such assurances, the project shall be denied.
- (7) *Concurrency resolution.* If the administrative official or determines that an application for concurrency review cannot be supported by sufficient concurrency facility capacity, the applicant may file an application for concurrency resolution and pay the requisite filing fee as shall be established by resolution of the village council. The purpose for the concurrency resolution process shall be to enable an applicant to negotiate a development agreement, which identifies terms for resolving the capacity deficiency. The development agreement shall be consistent with F.S. § 163.3220, and applicable village ordinances. If the applicant successfully resolves capacity deficiencies, the applicant may reserve capacity pursuant to the terms of the development agreement. If the issues cannot be resolved, the application shall be deemed to be denied and, at any time, the applicant may resubmit the concurrency review application to the administrative official.
- (f) *Capacity reservation.*
- (1) *Reservation of capacity.* Following receipt of an approved development order, the capacity demand of the approved development shall be considered to be reserved. The time frame of the concurrency reservation shall be based on the time frame of the building permit or development agreement. If the time frame of the development order and/or the development agreement lapses, the available capacity assigned to the development order shall be returned to the available capacity pool.

- (2) *First-come-first-served.* Capacity shall be reserved on a first-come, first-served basis by the administrative official. Such reservation shall be valid only for the specific final development order and for the specified land uses, densities, intensities, construction and improvement schedules contained in the approved development order. Reservation of capacity runs with the land and is transferable to a successor in ownership. Reservation of capacity for concurrency shall expire if the underlying development order or development agreement expires or is revoked. The development order shall state the terms of the concurrency reservation, including the allocation of available capacity, the time-frame for the allocation, and other appropriate legal assurances.
- (3) *Project deferrals/development moratoriums.* If at any time the village inventory of the capacity of concurrency facilities indicates that a concurrency facility has dropped below its adopted level of service standard, the village shall cease to issue development orders for projects which would impact the deficient facility or the area impacted by the deficient concurrency facility, as defined within this concurrency management system. Such a suspension or moratorium on the issuance of development orders shall continue until such time as the adopted level of service standard is re-established, the comprehensive development master plan is amended to reflect an acceptable level of service standard for the facilities in question, or alternative arrangements are made to ensure capacity will be available.
- (g) *Adopted level of service standards.* Level of service (LOS) standards for concurrency facilities are set forth below. Prior to issuing a development order the village shall review all proposed development to ensure consistency with adopted LOS standards. No development shall be approved that is projected to decrease the existing LOS below the adopted standard, unless mitigated by the developer.

TABLE 5-10

Facilities	Level of Service Standards
Sanitary sewer	100 gallons/capita/day
Potable water	95 gallons/capita/day
Solid waste	9.9 pounds/capita/day and maintain solid waste disposal capacity sufficient to accommodate waste flows committed to the system through long term interlocal agreements or contracts along with anticipated noncommitted waste flows for a period of five (5) years
Drainage	Water quality standard: Stormwater facilities shall be designed to meet the design and performance standards established in F.A.C. ch. 62-25, § 25.025, with treatment of the run-off from the first one inch of rainfall on-site to meet the water quality standards required by ch. 62-302, § 62-302.500 FAC. Water quantity standard: Where two or more standards impact a specific development, the most restrictive standard shall apply: - Post development runoff shall not exceed the pre-development runoff rate for a 25-year storm event, up to and including an event with a 24-hour duration. - Treatment of the runoff from the first one-inch of rainfall on site or the first half-inch of runoff whichever is greater.
Recreation and open space	Three acres per 1,000 population
Public schools	Beginning January 1, 2008, the adopted level of service (LOS) standard for all Miami-Dade County public school facilities is 100% utilization of Florida Inventory of School Houses (FISH) Capacity (With Relocatable Classrooms). This LOS standard except for Magnet Schools, shall be applicable in each public school concurrency service area (CSA), defined as the public school attendance boundary by the Miami-Dade County Public Schools. The adopted LOS standard for Magnet Schools is 100% of FISH (With Relocatable Classrooms), which shall be calculated on a districtwide basis.

TABLE 5-11
LOS FOR NON-FLORIDA INTERSTATE HIGHWAY ROADS

Location	Transit Availability		
	No Transit Service	20-Minute Headway Transit Service within ½ Mile	Extraordinary Transit Service (Commuter Rail or Express Bus)
Outside urban development boundary	LOS D: State minor arterials LOS C: County roads and state principal arterials	N/A	N/A
Between urban infill area and urban development boundary	LOS D: 90 percent of capacity; or LOS E on state urban minor arterials: 100 capacity	LOS E: 100% capacity	LOS E: 120% capacity
Inside urban infill area	LOS E: 100% capacity	LOS E: 120% capacity	LOS E: 150% capacity

Note: Urban infill area is located east of Northwest and Southwest 77 Avenue and SR 826 excluding the area north of SR 826 and west of I-95

TABLE 5-12
LOS FOR FLORIDA INTERSTATE HIGHWAY SYSTEM ROADWAYS

Type FHHS Facility	Urban Development Boundary Location		Roadways Parallel to Exclusive Transit Facilities	Inside Transportation Concurrency Management Areas	Constrained or Backlogged Roadways
	Outside	Inside			
Limited access facility	LOS B	LOS D [E]	LOS D [E]	LOS D [E]	Manager
Controlled access facility	LOS B	LOS D [E]	LOS E	LOS E	Manager

Note: LOS inside brackets [] apply to general use lanes only when exclusive through-lanes exist (Source Solin and Associates, Inc. with Carr Smith Corradino, 1998)

(h) *Methodology for determining demands on concurrency facilities.*

(1) *Roads.* In determining demand for available capacity for roads, the following criteria shall be used:

- a. *Residential development.* For residential development (except within planned developments), the following trip generation rates shall be used to calculate the impact of the proposed development:

Land Use Type	Trips Per Day Per Unit
Single-family	10

- b. *Nonresidential development.* For all other development categories allowed within the future land use element, the impacts of development shall be measured by utilizing the average peak trip generation rate associated with the land use designation in which the proposed development shall occur, using the most recent published edition of the Institute of Traffic Engineers' Trip Generation Manual. Internal capture rates may be considered in determining traffic volumes for mixed use developments; however, the applicant shall bear the burden of demonstrating any internal capture rates of the total nonresidential trips.
- c. *Other methods and procedures.* If the preliminary level of service information indicates a deficiency in capacity based on adopted level of service standards (reference paragraph (g) for adopted level of service standards for roads), the developer may at his option, prepare a more detailed alternative highway capacity analysis as described in the Highway Capacity Manual (Special Report 209, Transportation Research Board, National Research Council, 1985); or conduct a travel time and delay study following professional standards and procedures contained in the state department of transportation, traffic engineering office in its Manual for Uniform Traffic Studies. If the alternative methodology, after review and acceptance by the administrative official or, indicates no deficiency in the capacity based on the adopted level of service standard, notwithstanding that the comprehensive development master plan indicates a deficiency in capacity based on the adopted level of service standard, the results of the alternative methodology will be used. However, the village shall, at its discretion, reserve the option to have the methodology reviewed by a professional transportation engineer or transportation planner prior to accepting the methodology. The cost for such review shall be borne by the applicant.
- i. *Required traffic analysis.* For all new development, which are required to follow the site plan review process, the applicant/developer shall be required to submit a traffic analysis which identifies the development's impact on the village transportation system. The administrative official may also require the submission of a traffic analysis for developments if the site location, anticipated total trip generation, circulation patterns or other such factors warrant a more extensive review of traffic impacts.
- ii. *Traffic analysis methodology.* The impact area for the traffic analysis shall include adjacent and connected roadway segments as determined by the administrative official. The applicant may apply alternative trip allocations together with a statement of trip allocation methodology consistent with professional standards established in one or more of the following documents as may be updated from time to time:
- a. Highway Capacity Manual, Special Report 209, Transportation Research Board, National Research Council, 1985.
 - b. Florida Highway System Plan, "Traffic Analysis Procedures," Florida Department of Transportation Bureau of Multi-Modal Systems Planning, 1987.
 - c. Florida Highway System Plan "Level of Service Standards and Guidelines Manual," Florida Department of Transportation.
 - d. Trip Generation, Institute of Transportation Engineers (latest edition).
 - e. Transportation and Land Development, Stover, Virgil G., Institute of Transportation Engineers, 1988.
- iii. *Traffic analysis requirements.* The traffic analysis shall include the following:
- a. Total projected average weekday trips for the proposed development:

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- Pass-by capture rate (commercial land uses only);
 - Internal capture rate (planned development only);
 - Peak external trips based on ITE Trip Generation Manual, 5th (or most recent) Edition; and

Peak hour directional projected vehicle trips on all segments of the arterial and collector street system, which are adjacent to the development project or as determined necessary by the administrative official.

- b. Design capacity of the accessed road(s).
- c. Analysis of traffic distribution on the road network including all links impacted by more than ten percent of project traffic. The trip distribution shall be consistent with the "presets" contained in the approved trip generation model. The administrative official shall determine the approved trip generation model.
- d. Necessary operational improvements to the village, county, or state maintained transportation system in order to maintain the adopted level of service for the roadway.
- e. Other related information as required by the village.
- f. Justification, including appropriate references, for the use of any trip generation rates, adjustments factors or traffic assignment methods not previously approved by the village.
- g. The latest edition of the Institute of Transportation Engineers (ITE) Trip Generation manual shall be used to calculate these estimates. Adjustments to these estimates may be made, based on special trip generation information supplied by the applicant.

(2) *Other facilities.* The applicant shall provide the administrative official with the information required to apply the adopted level of service standard. The demand on concurrency facilities generated by the applicant's development shall be determined based on the following:

- a. *Solid waste.* The demand for solid waste collection and disposal capacity shall be determined by multiplying the total number of persons served times 9.9 pounds.
- b. *Potable water.* The demand for potable water capacity shall be determined by multiplying the total number of persons served times 200 gallons.
- c. *Sanitary sewer.* The demand for sanitary sewer capacity shall be determined by multiplying the total number of persons served times 100 gallons.
- d. *Drainage.* The applicant shall provide evidence demonstrating that the proposed project shall meet the LOS established in the Code for drainage facilities.
- e. *Recreation area.* The demand for recreation area shall be determined by applying the village recreation area level of service standard.

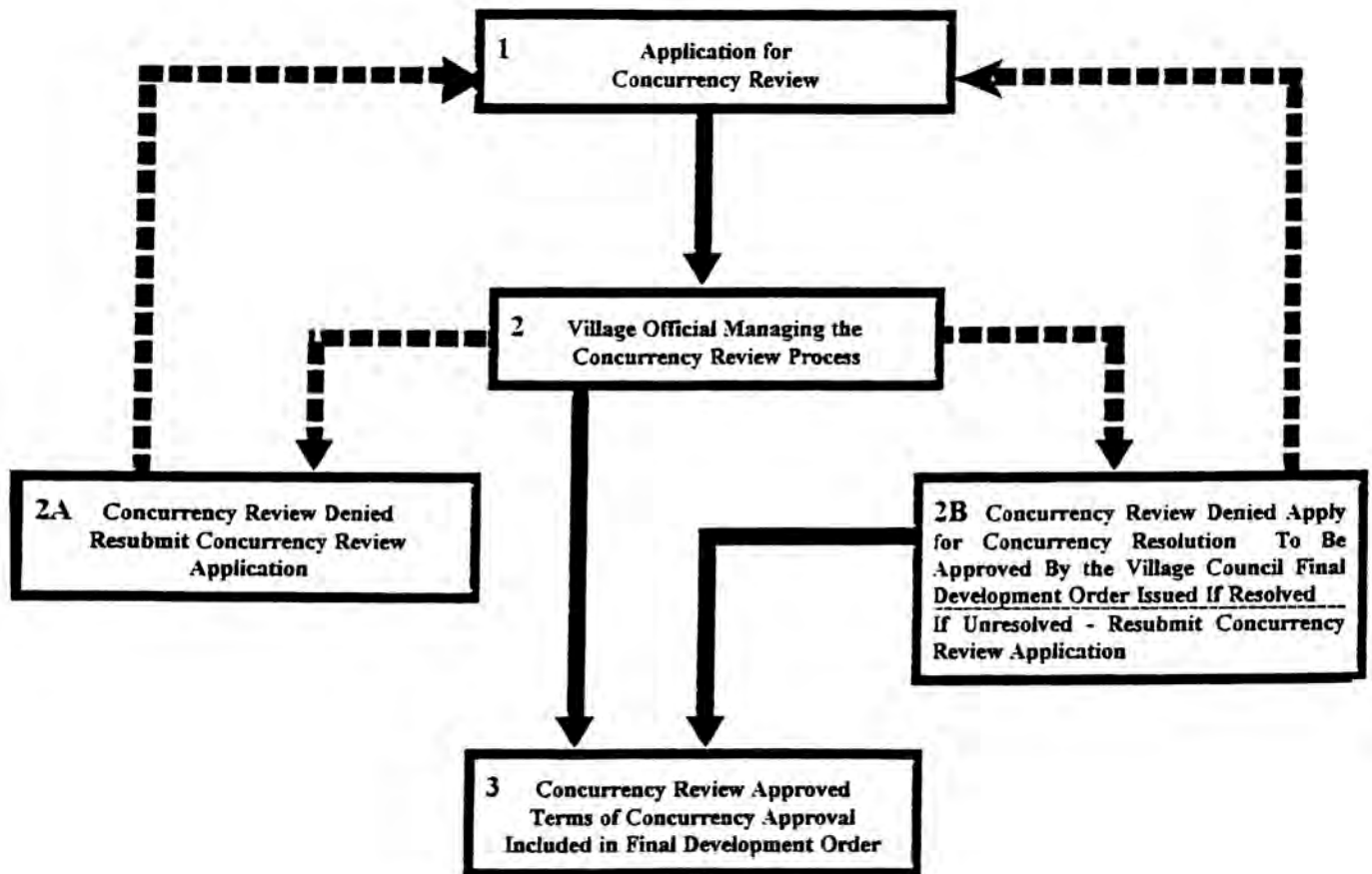
(i) *Determination of available capacity.* For purposes of this division, the available capacity of a facility shall be determined by adding the cumulative total supply for each public facility component described in subsection (1) below and subtracting cumulative total demand for each infrastructure component as in subsection (2) below.

1. Add the indicators of available facility capacity:

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- a. *Capacity of existing facility.* The total capacity of existing facilities operating at the required level of service; and
 - b. *Capacity of committed potable water, sewer, solid waste and drainage.* The total capacity of committed new facilities, if any, that will become available on or before the date a certificate of occupancy is issued for the development. The capacity of concurrency facilities may be counted and deemed concurrent only if the following standards are met:
 - i. For potable water, sewer, solid waste and drainage: The standards identified in the Code shall be met.
 - ii. For parks and recreation facilities: The standards identified in the Code shall be met.
 - iii. For roads: The standards identified in the Code shall be met.
2. Subtract the committed capacity:
- a. *Existing demand based on existing development.* The demand for services or facilities created by existing development as provided by the village.
 - b. *Demand to be generated by vested development, valid capacity reservation certificates, and valid certificates of concurrency.* The demand for the service or facility created by the anticipated completion of other vested and/or approved developments.

CONCURRENCY MANAGEMENT FLOWCHART

Village of Pinecrest



Concurrency Management Flowchart

(Ord. No. 2002-8, § 3, 11-13-02; Ord. No. 2014-02, § 2, 4-8-14; Ord. No. 2021-10, § 2(Exh. A), 10-19-21)