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VIA ELECTRONIC MAIL

December 19, 2025

Lourdes Gomez, AICP
Director, Department of Regulatory and Economic Resources
Miami-Dade County
111 Northwest 1st Street, 11th Floor
Miami, Florida 33128

Re: Waiver of County Code Deadlines Pursuant to Section 2-116.1(5)(b)(7) and Statutory Deadlines Pursuant to Florida Statutes Section 380.06(6) -- Miami-Dade County Comprehensive Development Master Plan Application No. CDMP20250019.

Dear Ms. Gomez:

This law firm has filed the above-referenced application on behalf of Parkland West LLC, Edward W. Easton, Trustee of Krome Groves Land Trust, Guherqui International, S.A., and Edward W. Easton Trust, (collectively, the "Applicant"), the owners of the above referenced Property (the "Property"). As you know, the CDMP application has been filed concurrently with: (1) a district boundary change from Interim District ("GU") to Urban Development Boundary Planned Area Development District ("UDBPAD") and related non-use variances; and (2) approval of a Development Order for the proposed City Park Development of Regional Impact ("DRI").

Given complex nature of the concurrent applications, we believe some additional time may be necessary for staff to complete its review as compared to a typical CDMP application.

Please consider this letter the Applicant's formal written waiver, pursuant to Section 2-116.1(5)(b)(7) of the Miami-Dade County Code, of the deadlines established by Section 2-116.1(5)(b) of the Code for all Community Council, Planning Advisory Board, and County Commission hearings.

The Applicant further hereby waives the deadline for the noticing and holding of the County Commission CDMP

transmittal hearing pursuant to Statute Section 380.06(6), which governs comprehensive plan amendments that are filed concurrently with DRI applications. I am attaching the relevant statutory section, which appeared in the Florida Statutes as of May 14, 2015. As you know, the concurrent DRI application has been deemed "grandfathered" from state law changes that negated the need for DRI review and the 2015 version of the Statutes applies.

We look forward to reviewing and discussing Department comments on the proposal. Should you have any questions or comments, please do not hesitate to phone me at (305) 377-6229.

Very truly yours,

Graham Penn

cc: Isabel Cosio Carballo, MPA
Bob Cambric, AICP
Christina Miski, AICP
Jeffrey Bercow, Esq.
Nicholas Rodriguez, Esq.

West's Florida Statutes Annotated

Title XXVIII. Natural Resources; Conservation, Reclamation, and Use (Chapters 369-380)

Chapter 380. Land and Water Management ([Refs & Annos](#))

Part I. Environmental Land and Water Management

This section has been updated. Click [here](#) for the updated version.

West's F.S.A. § 380.06

380.06. Developments of regional impact

Effective: May 14, 2015 to June 29, 2015

(1) Definition.--The term “development of regional impact,” as used in this section, means any development which, because of its character, magnitude, or location, would have a substantial effect upon the health, safety, or welfare of citizens of more than one county.

(2) Statewide guidelines and standards.--

(a) The state land planning agency shall recommend to the Administration Commission specific statewide guidelines and standards for adoption pursuant to this subsection. The Administration Commission shall by rule adopt statewide guidelines and standards to be used in determining whether particular developments shall undergo development-of-regional-impact review. The statewide guidelines and standards previously adopted by the Administration Commission and approved by the Legislature shall remain in effect unless revised pursuant to this section or superseded by other provisions of law.

(b) In adopting its guidelines and standards, the Administration Commission shall consider and shall be guided by:

1. The extent to which the development would create or alleviate environmental problems such as air or water pollution or noise.
2. The amount of pedestrian or vehicular traffic likely to be generated.
3. The number of persons likely to be residents, employees, or otherwise present.
4. The size of the site to be occupied.
5. The likelihood that additional or subsidiary development will be generated.
6. The extent to which the development would create an additional demand for, or additional use of, energy, including the energy requirements of subsidiary developments.

take effect, and the period of time for which the permit is valid shall begin to run, upon expiration of the time allowed for an administrative appeal of the development or upon final action following an administrative appeal or judicial review, whichever is later. However, if the application for development approval is not filed within 18 months after the issuance of the permit, the time of validity of the permit shall be considered to be from the date of issuance of the permit. If a project is required to obtain a binding letter under subsection (4), any state or regional agency permit necessary for the construction or operation of the project that is valid for 5 years or less shall take effect, and the period of time for which the permit is valid shall begin to run, only after the developer obtains a binding letter stating that the project is not required to undergo development-of-regional-impact review or after the developer obtains a development order pursuant to this section.

(c) Prior to the issuance of a final development order, the developer may elect to be bound by the rules adopted pursuant to chapters 373 and 403 in effect when such development order is issued. The rules adopted pursuant to chapters 373 and 403 in effect at the time such development order is issued shall be applicable to all applications for permits pursuant to those chapters and which are necessary for and consistent with the development authorized in such development order, except that a later adopted rule shall be applicable to an application if:

1. The later adopted rule is determined by the rule-adopting agency to be essential to the public health, safety, or welfare;
2. The later adopted rule is adopted pursuant to [s. 403.061\(27\)](#);
3. The later adopted rule is being adopted pursuant to a subsequently enacted statutorily mandated program;
4. The later adopted rule is mandated in order for the state to maintain delegation of a federal program; or
5. The later adopted rule is required by state or federal law.

(d) The provision of day care service facilities in developments approved pursuant to this section is permissible but is not required.

Further, in order for any developer to apply for permits pursuant to this provision, the application must be filed within 5 years from the issuance of the final development order and the permit shall not be effective for more than 8 years from the issuance of the final development order. Nothing in this paragraph shall be construed to alter or change any permitting agency's authority to approve permits or to determine applicable criteria for longer periods of time.

(6) Application for approval of development; concurrent plan amendments.--

(a) Prior to undertaking any development, a developer that is required to undergo development-of-regional-impact review shall file an application for development approval with the appropriate local government having jurisdiction. The application shall contain, in addition to such other matters as may be required, a statement that the developer proposes to undertake a development of regional impact as required under this section.

(b) Any local government comprehensive plan amendments related to a proposed development of regional impact, including any changes proposed under subsection (19), may be initiated by a local planning agency or the developer and must be considered

by the local governing body at the same time as the application for development approval using the procedures provided for local plan amendment in [s. 163.3184](#) and applicable local ordinances, without regard to local limits on the frequency of consideration of amendments to the local comprehensive plan. This paragraph does not require favorable consideration of a plan amendment solely because it is related to a development of regional impact. The procedure for processing such comprehensive plan amendments is as follows:

1. If a developer seeks a comprehensive plan amendment related to a development of regional impact, the developer must so notify in writing the regional planning agency, the applicable local government, and the state land planning agency no later than the date of preapplication conference or the submission of the proposed change under subsection (19).
2. When filing the application for development approval or the proposed change, the developer must include a written request for comprehensive plan amendments that would be necessitated by the development-of-regional-impact approvals sought. That request must include data and analysis upon which the applicable local government can determine whether to transmit the comprehensive plan amendment pursuant to [s. 163.3184](#).
3. The local government must advertise a public hearing on the transmittal within 30 days after filing the application for development approval or the proposed change and must make a determination on the transmittal within 60 days after the initial filing unless that time is extended by the developer.
4. If the local government approves the transmittal, procedures set forth in [s. 163.3184¹](#) must be followed.

<Text of subsec. (6)(b)5. amended by [Laws 2012, c. 2012-96, § 60.](#) >

5. Notwithstanding subsection (11) or subsection (19), the local government may not hold a public hearing on the application for development approval or the proposed change or on the comprehensive plan amendments sooner than 30 days after receipt of the response from the state land planning agency pursuant to [s. 163.3184\(3\)\(c\) 1.](#)

<Text of subsec. (6)(b)5. amended by [Laws 2012, c. 2012-99, § 17.](#) >

5. Notwithstanding subsection (11) or subsection (19), the local government may not hold a public hearing on the application for development approval or the proposed change or on the comprehensive plan amendments sooner than 30 days after reviewing agency comments are due to the local government pursuant to [s. 163.3184](#).
6. The local government must hear both the application for development approval or the proposed change and the comprehensive plan amendments at the same hearing. However, the local government must take action separately on the application for development approval or the proposed change and on the comprehensive plan amendments.
7. Thereafter, the appeal process for the local government development order must follow the provisions of [s. 380.07](#), and the compliance process for the comprehensive plan amendments must follow the provisions of [s. 163.3184](#).

(7) Preapplication procedures.--