



200 S. Biscayne Boulevard
Suite 300, Miami, FL 33131

www.brzoninglaw.com

305.377.6229 office
305.377.6222 fax
gpenn@brzoninglaw.com

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 Statutory Deadlines Pursuant to Florida Statutes
Section 380.06(11) – City Park Development of Regional
Impact PH No. Z2025000221.

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 City Park Development of Regional Impact ("DRI") 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 CDMP application.

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 zoning application.

The Applicant hereby waives the deadline for the noticing and holding of the County Commission hearing on the DRI pursuant to Statute Section 380.06(11)(d), which governs the local government noticing and hearing requirements. I am attaching the relevant statutory section, which appeared in the Florida Statutes as of May 14, 2015. As you know, the 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.

for issuing a construction or operation permit. The agency may revoke or appropriately modify a valid conceptual approval if the agency shows:

1. That an applicant or his or her agent has submitted materially false or inaccurate information in the application for conceptual approval;
2. That the developer has violated a condition of the conceptual approval; or
3. That the development will cause a violation of the agency's applicable laws or rules.

(f) Nothing contained in this subsection shall modify or abridge the law of vested rights or estoppel.

(g) Nothing contained in this subsection shall be construed to preclude an agency from adopting rules for conceptual review for developments which are not developments of regional impact.

(10) Application; sufficiency.--

(a) When an application for development approval is filed with a local government, the developer shall also send copies of the application to the appropriate regional planning agency and the state land planning agency.

(b) If a regional planning agency determines that the application for development approval is insufficient for the agency to discharge its responsibilities under subsection (12), it shall provide in writing to the appropriate local government and the applicant a statement of any additional information desired within 30 days of the receipt of the application by the regional planning agency. The applicant may supply the information requested by the regional planning agency and shall communicate its intention to do so in writing to the appropriate local government and the regional planning agency within 5 working days of the receipt of the statement requesting such information, or the applicant shall notify the appropriate local government and the regional planning agency in writing that the requested information will not be supplied. Within 30 days after receipt of such additional information, the regional planning agency shall review it and may request only that information needed to clarify the additional information or to answer new questions raised by, or directly related to, the additional information. The regional planning agency may request additional information no more than twice, unless the developer waives this limitation. If an applicant does not provide the information requested by a regional planning agency within 120 days of its request, or within a time agreed upon by the applicant and the regional planning agency, the application shall be considered withdrawn.

(c) The regional planning agency shall notify the local government that a public hearing date may be set when the regional planning agency determines that the application is sufficient or when it receives notification from the developer that the additional requested information will not be supplied, as provided for in paragraph (b).

(11) Local notice.--Upon receipt of the sufficiency notification from the regional planning agency required by paragraph (10) (c), the appropriate local government shall give notice and hold a public hearing on the application in the same manner as for a rezoning as provided under the appropriate special or local law or ordinance, except that such hearing proceedings shall be recorded by tape or a certified court reporter and made available for transcription at the expense of any interested party. When a development of regional impact is proposed within the jurisdiction of more than one local government, the local governments, at

the request of the developer, may hold a joint public hearing. The local government shall comply with the following additional requirements:

- (a) The notice of public hearing shall state that the proposed development is undergoing a development-of-regional-impact review.
- (b) The notice shall be published at least 60 days in advance of the hearing and shall specify where the information and reports on the development-of-regional-impact application may be reviewed.
- (c) The notice shall be given to the state land planning agency, to the applicable regional planning agency, to any state or regional permitting agency participating in a conceptual agency review process under subsection (9), and to such other persons as may have been designated by the state land planning agency as entitled to receive such notices.
- (d) A public hearing date shall be set by the appropriate local government at the next scheduled meeting. The public hearing shall be held no later than 90 days after issuance of notice by the regional planning agency that a public hearing may be set, unless an extension is requested by the applicant.

(12) Regional reports.--

(a) Within 50 days after receipt of the notice of public hearing required in paragraph (11)(c), the regional planning agency, if one has been designated for the area including the local government, shall prepare and submit to the local government a report and recommendations on the regional impact of the proposed development. In preparing its report and recommendations, the regional planning agency shall identify regional issues based upon the following review criteria and make recommendations to the local government on these regional issues, specifically considering whether, and the extent to which:

1. The development will have a favorable or unfavorable impact on state or regional resources or facilities identified in the applicable state or regional plans. As used in this subsection, the term “applicable state plan” means the state comprehensive plan. As used in this subsection, the term “applicable regional plan” means an adopted strategic regional policy plan.
2. The development will significantly impact adjacent jurisdictions. At the request of the appropriate local government, regional planning agencies may also review and comment upon issues that affect only the requesting local government.
3. As one of the issues considered in the review in subparagraphs 1. and 2., the development will favorably or adversely affect the ability of people to find adequate housing reasonably accessible to their places of employment if the regional planning agency has adopted an affordable housing policy as part of its strategic regional policy plan. The determination should take into account information on factors that are relevant to the availability of reasonably accessible adequate housing. Adequate housing means housing that is available for occupancy and that is not substandard.

(b) The regional planning agency report must contain recommendations that are consistent with the standards required by the applicable state permitting agencies or the water management district.