

MIAMI-DADE COUNTY

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

- 1. 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.**

Response: This comment is acknowledged.

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:

Question 19. Stormwater Management

- 2. 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.**

Response: The revised report has addressed the comments below as discussed with DERM Water Control Staff on 28 May 2026.

- 3. 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.**

Response: The storage volume was indicated above the 100-year peak stage so it had no impact on the calculations. For clarity all storage in the building column was removed.

- b. Provide the conceptual location of the proposed 66-acre lake(s). Include a conceptual site plan in the Conceptual Stormwater Management Master Plan.**

Response: A conceptual site plan was added to 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.**

Response: A conceptual site plan was added to the Conceptual Stormwater Management Master Plan showing the locations of the parks/open space areas.

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

Response: Comment noted. A proper environmental assessment will be completed at the time of permitting. The following statement was added to the Conceptual Stormwater Management Plan.

"Understanding this is a redevelopment of an agricultural land area, the project can utilize other traditional stormwater management best management practices to address stormwater quality and quantity requirements such as lined dry ponds and intermediate exfiltration trenches. These are both common BMPs used when shallow groundwater contamination is encountered".

- 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.**

Response: The calculations have been revised to include exfiltration trench for the 5-year/1-day storm event.

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

Response: As discussed with DERM staff the percolation rate utilized was from other nearby projects. Hydraulic conductivity tests will be completed on the subject property at the time of permitting.

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

will be maintained.

Response: The Applicant is cognizant of the recorded canal reservations within the property, and has actively been discussing these reservations with government staff. Applicant acknowledges and agrees that these reservations must be complied with, modified or released prior to issuance of the first building permit within the property.

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

Response: The Applicant is cognizant of the recorded canal reservations within the property, and has actively been discussing these reservations with government staff. Applicant acknowledges and agrees that these reservations must be complied with, modified or released prior to issuance of the first building permit within the property.

- i. Per coordination with Water Control Section staff, the following options have been provided:**

- a. 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).**
- b. Existing 130-foot-wide canal reservations within the proposed development:**
 - i. ORB 7131, Page 561: 130' x 2,640' = 343,200 sq. ft.**
 - ii. ORB 7118, Page 390: 130' x 3,960' = 514,800 sq. ft.**
 - iii. Total area: 858,000 sq. ft.**
- c. Verification of equivalent area conversion (80-foot-wide canal right-of-way): 80' x 10,725' = 858,000 sq. ft.**
- d. Alternative 1: 80' x 10,725' = 858,000 sq. ft. (connection assumed at SW 162 Avenue)**
- e. Alternative 2: 80' x 10,725' = 858,000 sq. ft. (connection assumed at SW 167 Avenue)**

Response: The Applicant is cognizant of the recorded canal reservations within the property, and has actively been discussing these reservations with government staff. Applicant acknowledges and agrees that these reservations must be complied with, modified or released prior to issuance of the first building permit within the property.

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

Response: The Applicant is cognizant of the recorded canal reservations within the property, and has actively been discussing these reservations with government staff. Applicant acknowledges and agrees that these reservations must be complied with, modified or released prior to issuance of the first building permit within the property.

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

Question 10. General Project Description

- 4. 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.**

Response: Question 10. General Project Description has been amended to reflect that City Park encompasses approximately 991 gross acres and 931 net acres.

- 5. 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**

Response: The number of residential units within the mixed-use development was previously clarified in the response to Miami-Dade County's First Statement of Information Needed, Comment 10, Page 8. In addition, a footnote has been added to Table 10.A.1 clarifying that the Project includes a total of 7,800 residential dwelling units. Of that total, 1,652 dwelling units are proposed within mixed-use development areas, and the remaining 6,148 dwelling units are proposed within stand-alone residential land use categories.

- 6. 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**

Response: The Applicant respectfully disagrees that the City Park development's characterization as a Transit-Oriented Development (TOD) is dependent upon the existence of future commuter rail service on the CSX Portland Spur.

The City Park development has been planned consistent with the State of Florida's definition of a Transit-Oriented Development contained in Section 163.3164(49), Florida Statutes, which defines TOD as:

"A project or projects, in areas identified in a local government comprehensive plan, that is or will be served by existing or planned transit service. These areas shall be compact, moderate to high density developments, of mixed-use character, interconnected with other land uses, bicycle and pedestrian friendly, and designed to support frequent transit service operating through, collectively or separately, rail, fixed guideway, streetcar, or bus systems on dedicated facilities or available roadway connections."

The City Park Master Development Plan embodies these characteristics independent of

any future rail service on the CSX Portland Spur. Specifically, the project includes:

- A compact, mixed-use development pattern consisting of residential, retail, office, civic, educational, recreational, and employment-generating uses;
- Residential densities exceeding the minimum density requirements applicable to UDB expansion areas;
- A walkable community design organized around mixed-use centers and neighborhood-serving destinations;
- An interconnected street, pedestrian, bicycle, trail, and greenway network designed to facilitate non-automobile travel;
- Land use patterns that place housing, employment, schools, parks, and commercial services in close proximity to one another; and
- Development designed to support transit service operating on existing and future roadway corridors.

Importantly, Section 163.3164(49), F.S., does not require that a TOD be served by rail transit. The statutory definition expressly recognizes that frequent transit service may be provided through rail, fixed guideway, streetcar, or bus systems operating on dedicated facilities or available roadway connections. Accordingly, a development may satisfy the statutory characteristics of a TOD without being dependent upon commuter rail service.

The Applicant acknowledges that no commuter rail service is currently proposed or committed on the CSX Portland Spur and that the development approval does not rely upon the implementation of such service. References to the Portland Spur in the Application for Development Approval were intended to identify a potential long-term transportation opportunity within the broader South Dade area rather than a transportation improvement upon which the project depends.

The Applicant has revised the Application for Development Approval to clarify that City Park is not predicated upon future commuter rail service on the CSX Portland Spur. Rather, the project's Transit-Oriented Development characteristics are derived from its compact, mixed-use, walkable, bicycle-friendly, and transit-supportive design, consistent with Section 163.3164(49), Florida Statutes, and its proximity to existing and planned transit facilities within the South Dade Transitway corridor.

7. **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**

Response: Please see response to comment 5., above. Furthermore, the non-residential square footage within the mixed-use development was previously clarified in the response to Miami-Dade County's First Statement of Information Needed, Comment 12, Page 10.

Additionally, a footnote has been added to Table 10.A.1 clarifying that the Project total of 673,902 square feet of Retail space includes 299,387 square feet mixed-use retail development and 374,515 square feet of stand-alone retail development.

8. **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.

Response: National transportation and planning research supports the conclusion that compact, mixed-use, walkable, and transit-supportive development patterns can reduce vehicle trip generation, vehicle miles traveled, and reliance on single-occupancy automobile travel when compared to conventional single-use, automobile-oriented development patterns. Relevant sources include the U.S. EPA Mixed-Use Trip Generation Model; TRB/NCHRP Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments*; ITE trip-generation and internal-capture methodology; TRB/TCRP Report 95, Chapter 15, *Land Use and Site Design*; Ewing and Cervero's peer-reviewed meta-analysis, *Travel and the Built Environment*; TRB Special Report 298, *Driving and the Built Environment*; and TRB/TCRP Report 128, *Effects of TOD on Housing, Parking, and Travel*.

These sources collectively support the planning principle that a development pattern containing complementary land uses, shorter travel distances, walkable street networks, transit-supportive densities, and multimodal facilities can reduce the number and length of automobile trips. For City Park, these principles are implemented through the project's mixed-use land use program, internal street and greenway network, distribution of schools, parks, civic uses, retail/commercial uses and employment areas, potential transit connections, and transportation analysis addressing internal capture and multimodal travel

The City Park application supports the reduction of reliance on single-occupancy vehicles through the proposed land use program, internal street network, pedestrian and bicycle connections, planned transit-supportive development pattern, and location of daily needs within the project. As shown in the concurrent UDBPAD zoning application the proposed development program includes a mix of residential, retail/commercial, office, civic, school, park, open space, and employment-generating uses organized around a hierarchy of walkable neighborhoods and mixed-use centers. See Miami-Dade County zoning application Z2025000222. This pattern is specifically intended to shorten travel distances, increase internal trip capture, and allow a greater share of daily trips to be made by walking, bicycling, transit, golf cart/low-speed vehicle, or shared vehicle trips rather than by single-occupancy vehicles.

For City Park, the measurable reduction in single-occupancy vehicle reliance is supported by the following project-specific features:

1. **Mixed-use land use program.** The project places residential neighborhoods, employment uses, retail/commercial services, civic uses, parks, schools, and open space within the same master-planned community. This mix of uses allows

a portion of home-based work, shopping, school, recreation, and service trips to remain internal to the project rather than requiring external automobile trips.

2. **Reduced travel distances.** The land use plan is organized around mixed-use centers, neighborhood-serving retail, schools, parks, and open space amenities distributed throughout the development. This structure reduces the distance between residential areas and daily destinations, which is a necessary condition for walking, bicycling, transit use, and non-single-occupant travel modes.
3. **Transit-supportive densities and site layout.** The proposed development pattern includes densities and intensities that support future transit service and potential extension or modification of existing transit routes. The project is not designed as isolated low-density residential development. Rather, it includes mixed-use and higher-intensity areas intended to support transit accessibility and reduce dependence on private automobile trips.
4. **Complete street and multimodal network.** The site layout includes an interconnected street system, pedestrian facilities, bicycle facilities, greenway connections, and internal mobility corridors. These facilities are intended to provide direct and convenient alternatives to single-occupancy vehicle travel for internal trips and for access to transit stops and community destinations.
5. **Distribution of schools, parks, and civic uses.** The plan locates schools, parks, and civic/community-serving uses within the development rather than requiring all such trips to be externalized. This is significant because school, park, and local service trips are among the types of trips most capable of shifting from single-occupancy vehicle travel to walking, bicycling, carpooling, transit, or other shared modes when destinations are located nearby and connected by safe facilities.

In summary, the reduction in single-occupancy vehicle reliance is based on the combined effect of the project's specific land use mix, internal destination structure, walkable neighborhood layout, multimodal circulation system, and transit-supportive development pattern.

9. **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**

Response:

The Applicant respectfully disagrees that the City Park development's characterization as a Transit-Oriented Development (TOD) is dependent upon the existence of future

commuter rail service on the CSX Portland Spur.

The City Park development has been planned consistent with the State of Florida's definition of a Transit-Oriented Development contained in Section 163.3164(49), Florida Statutes, which defines TOD as:

"A project or projects, in areas identified in a local government comprehensive plan, that is or will be served by existing or planned transit service. These areas shall be compact, moderate to high density developments, of mixed-use character, interconnected with other land uses, bicycle and pedestrian friendly, and designed to support frequent transit service operating through, collectively or separately, rail, fixed guideway, streetcar, or bus systems on dedicated facilities or available roadway connections."

The City Park Master Development Plan embodies these characteristics independent of any future rail service on the CSX Portland Spur. Specifically, the project includes:

- A compact, mixed-use development pattern consisting of residential, retail, office, civic, educational, recreational, and employment-generating uses;
- Residential densities exceeding the minimum density requirements applicable to UDB expansion areas;
- A walkable community design organized around mixed-use centers and neighborhood-serving destinations;
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The Applicant acknowledges that no commuter rail service is currently proposed or committed on the CSX Portland Spur and that the development approval does not rely upon the implementation of such service. References to the Portland Spur in the Application for Development Approval were intended to identify a potential long-term transportation opportunity within the broader South Dade area rather than a transportation improvement upon which the project depends.

The Applicant has revised the Application for Development Approval to clarify that City Park is not predicated upon future commuter rail service on the CSX Portland Spur. Rather, the project's Transit-Oriented Development characteristics are derived from its compact, mixed-use, walkable, bicycle-friendly, and transit-supportive design, consistent

with Section 163.3164(49), Florida Statutes, and its proximity to existing and planned transit facilities within the South Dade Transitway corridor.

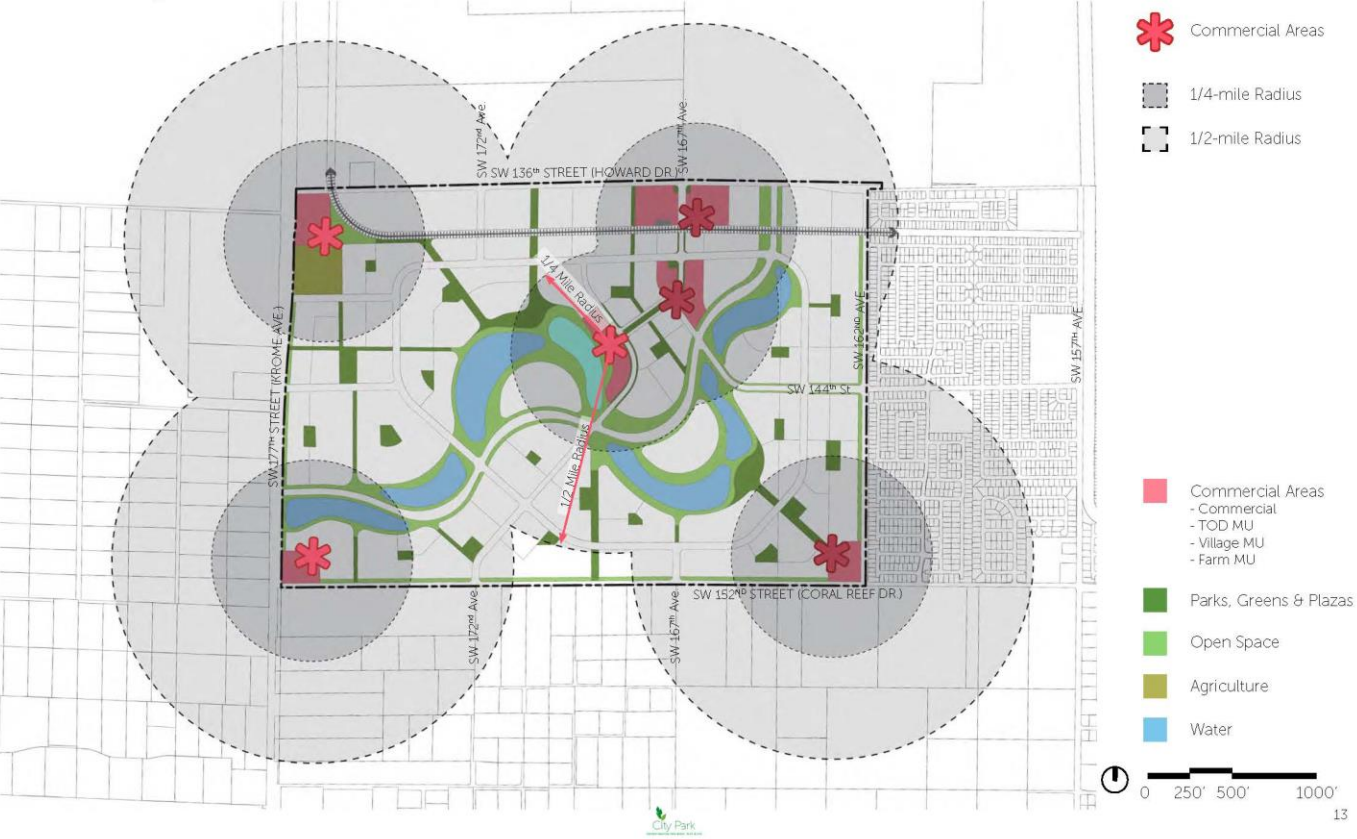
- 10. Page 10-4: Provide the maximum and average walking distance from the farthest residential units to their nearest commercial/infrastructure areas to serve resident daily-need land uses (e.g., grocery, pharmacy, school, transit stop). This information is essential to evaluate the walkability and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

Response: The two walkability graphics shown below illustrate how City Park is organized to place daily destinations within convenient walking distance of residential neighborhoods.

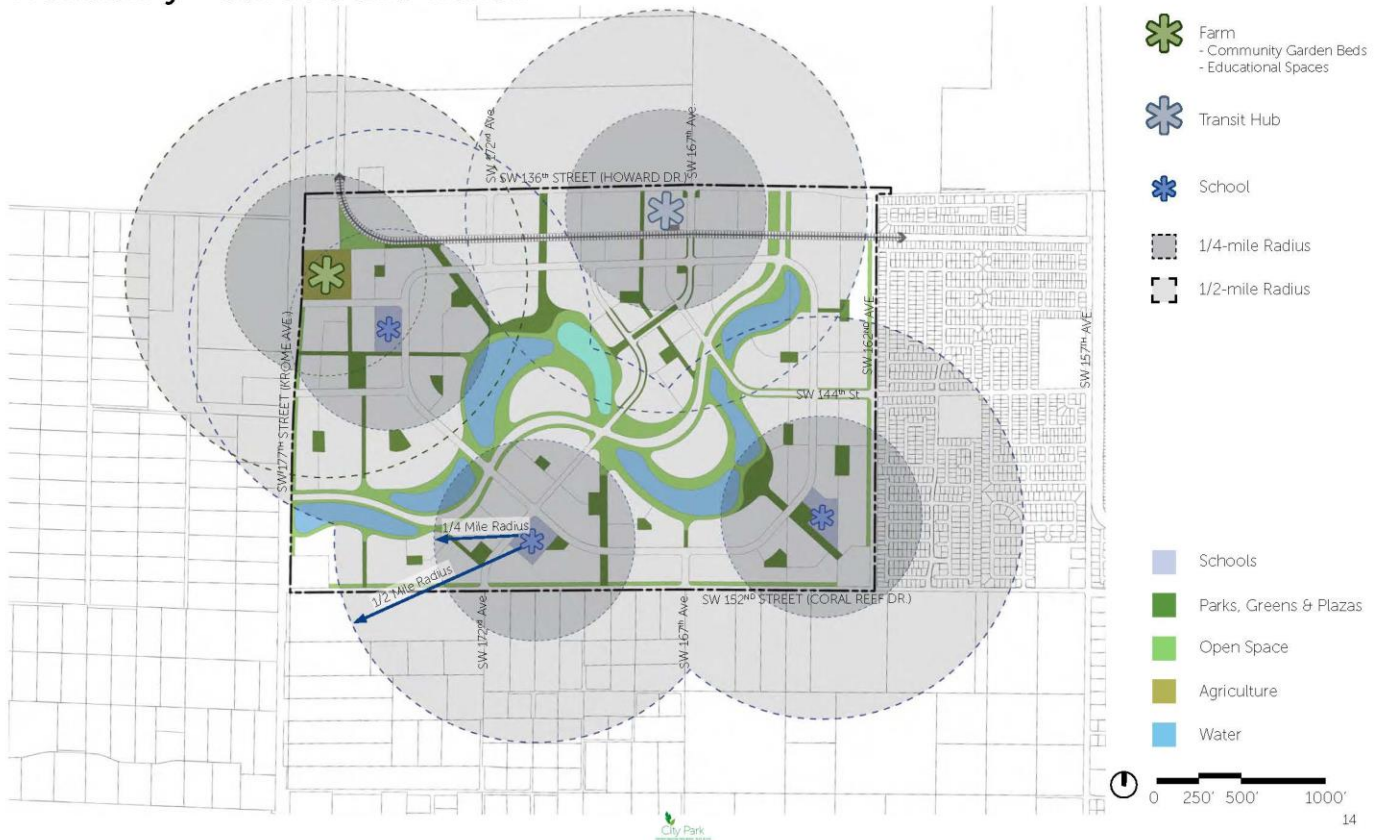
The **Walkability – Commercial** graphic illustrates the distribution of commercial areas throughout City Park, including commercial, TOD mixed-use, Village mixed-use, and Farm mixed-use locations. The graphic demonstrates that retail and service uses are planned at multiple locations across the site, including the Village Core, northern mixed-use areas, and selected gateway locations, so that commercial activity is accessible to surrounding neighborhoods rather than concentrated in a single retail node. The 1/4-mile and 1/2-mile radii also extend beyond the City Park boundary, demonstrating that residents in surrounding areas outside City Park will have convenient access to neighborhood-serving commercial uses intended to meet daily shopping, dining, and service needs. Based on the radii shown, **approximately 44% of the City Park site is within a 1/4-mile distance** of a commercial area, and **approximately 97% or more of the site is within a 1/2-mile distance** of a commercial area.

The **Walkability – Schools and Transit** graphic illustrates the planned relationship between schools, the transit hub, the farm, parks, open space, and water features. The graphic shows that schools and transit-supportive facilities are distributed to serve multiple neighborhoods and are connected through the project's open space and pedestrian framework. The 1/4-mile and 1/2-mile radii extend off site, indicating that these community-serving uses will also be conveniently accessible to nearby residents outside City Park. Based on the radii shown, **approximately half of the City Park site is within a 1/4-mile distance** of a school, transit hub, or farm/community education area, and **approximately 98% of the site is within a 1/2-mile distance** of one of these community-serving destinations.

Walkability - Commercial



Walkability - Schools and Transit



- 11. Page 10-5: The acreage shown in this page differs from the acreages shown in the CDMP application. Net acreage is inconsistent.**

Response: Question 10. General Project Description has been amended to reflect that City Park encompasses approximately 991 gross acres and 931 net acres.

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

Response: As set forth in the City Park ADA, the merchandise mix and scale of retail within City Park is envisioned to represent neighborhood-type shopping and dining that primarily serves City Park residents, workers and City Park visitors as opposed to serving as a more regional/destination offering. As stated in Q10, Part 1, Section E, demand for commercial space generated by City Park residents and the day-time worker population alone is approximately 728,000 square feet, which exceeds the 673,902 square feet of retail/commercial space planned for City Park. Accordingly, the analysis demonstrates that the planned retail/commercial program is supported by internal project demand and is not dependent upon drawing substantial regional trade area demand from outside the project.

The ADA response provides a discussion of the primary and secondary trade areas for City Park and, specifically: the primary trade area for City Park representing an approximate 10-minute drive time from the entrance of City Park (SW 144th Street and SW 162nd Avenue) while a secondary trade area extends to an approximate 15-minute drivetime radius from the entrance. These geographies are aligned with industry data and GIS-based retail analysis methods indicate that the primary trade area is most commonly defined using short drive-time thresholds, typically in the range of five to fifteen minutes, with a ten-minute drivetime frequently used as a standard benchmark for evaluating core market support.^[1]

The determination of drivetime boundaries is based upon ESRI mapping data. The most accurate boundary definition from ESRI requires the center point of a defined geographic area be positioned on an existing roadway network. Therefore, the center point was positioned at the entrance to City Park at S.W. 144th Street and S.W. 162nd Avenue.

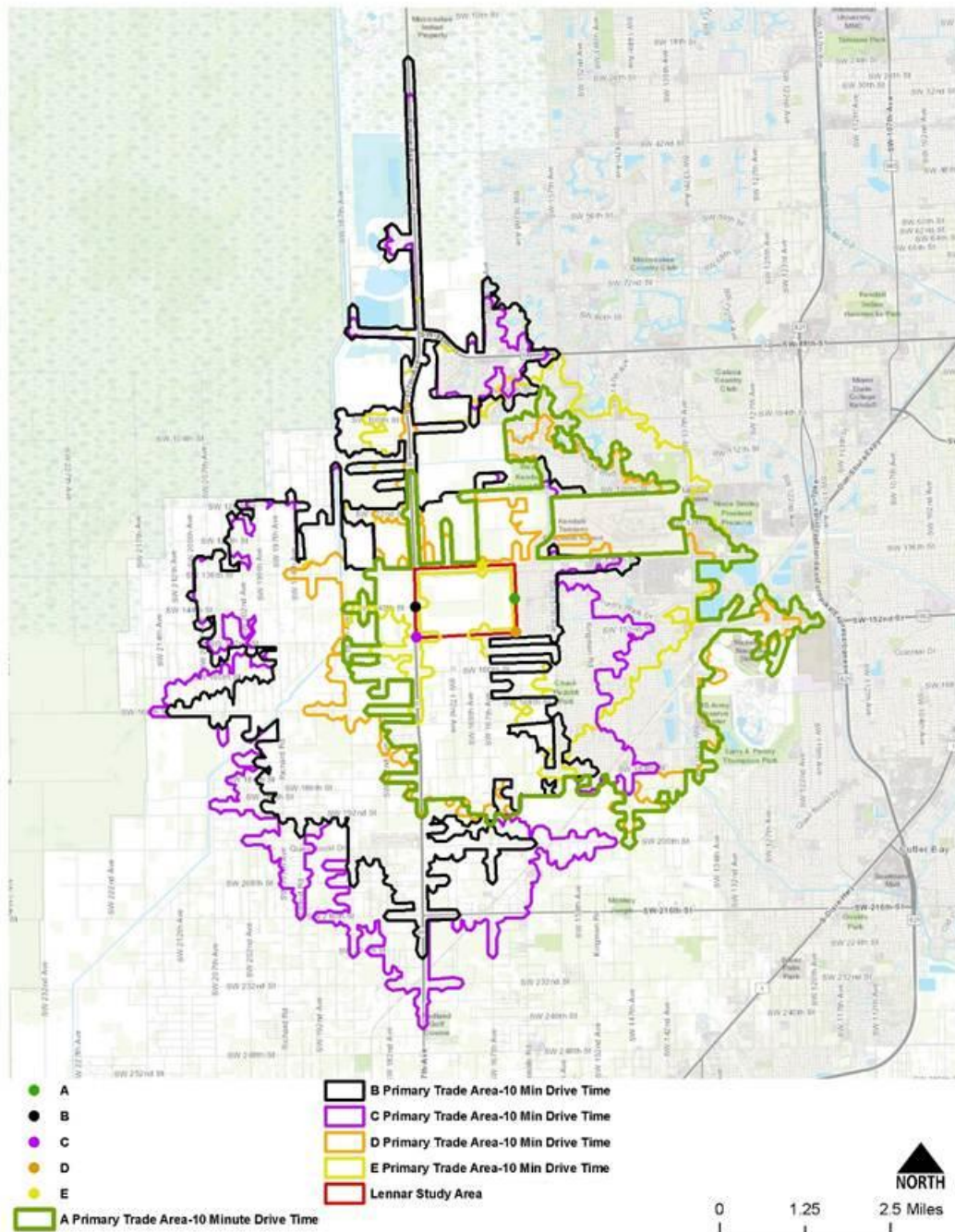
In accordance with the City Park Concept Land Plan to date, there are designated neighborhood commercial retail centers located at: the northwest corner of S.W. 162nd Avenue and S.W. 152nd Street; the northeast corner of S.W. 152nd Street and Krome Avenue; and, the southeast and southwest intersection of S.W. 167th Avenue and Howard Drive. These commercial properties are positioned on existing roadway networks; although, S.W. 167th Avenue is not currently a paved road. There is also a concentration of mixed-use/retail development in City Park's core which has no existing roadway network but will be principally internal to the development.

In response to MDCRER's request to define the trade area for each center despite the fact that the City Park residents and workers fully support the planned commercial space, we prepared additional analysis from ESRI for the three commercial centers noted above that will be located on the existing roadway network, as well as for one additional location at the western edge of the development (Krome Avenue and SW 145th Street). An illustration of the primary and secondary trade areas for each designated commercial center are provided as an attachment herein.

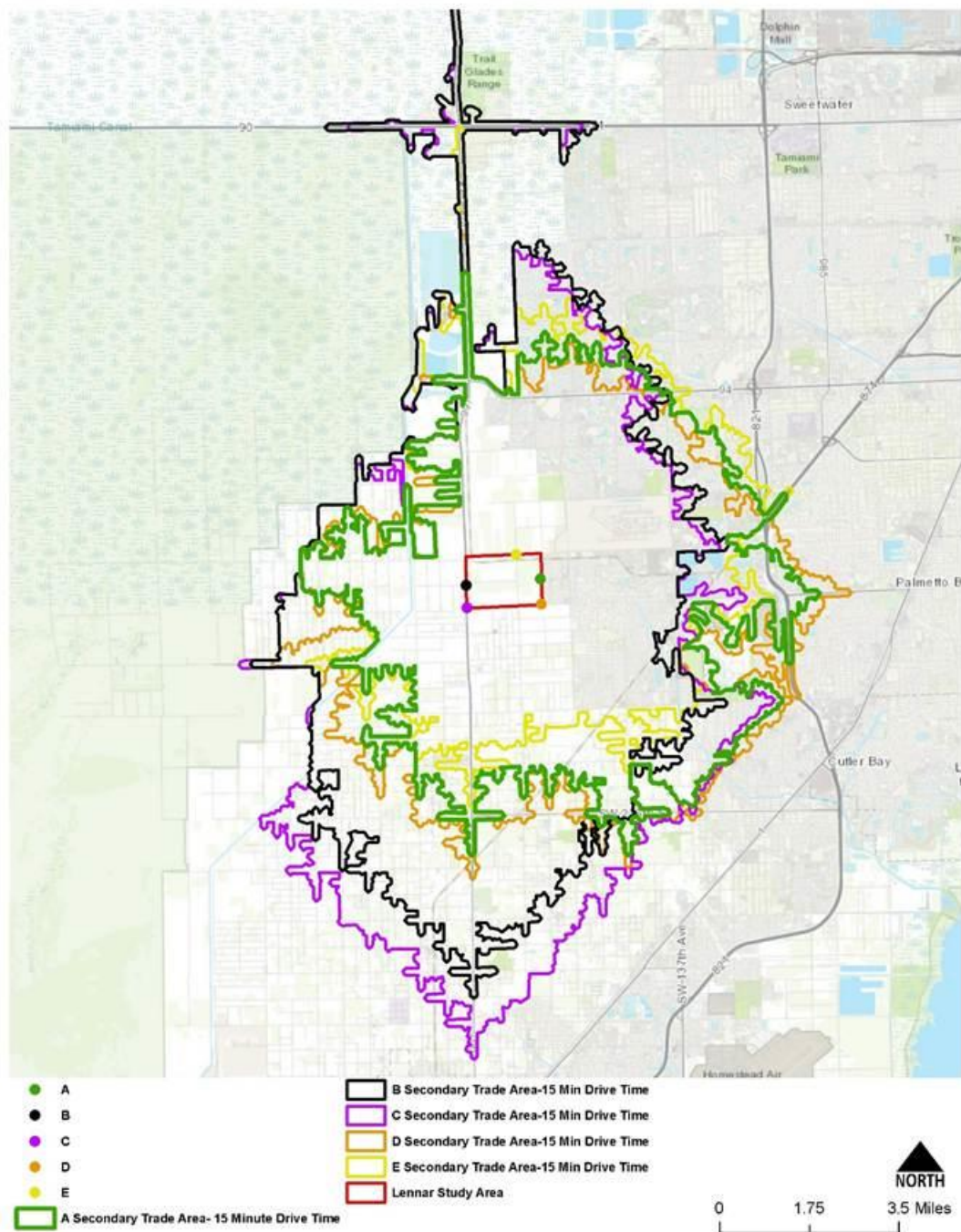
In sum, the primary and secondary trade areas shift modestly between the four commercial centers. However, and most importantly, the total number of households, household income, and total household income (factors which are key to determining retail expenditure) does not vary significantly from one another nor from the original location detailed within the ADA.

Secondary Trade Area/Location	Total HH's	Median HH Income
<i>SW 162nd Ave/SW 144th St.</i>	57,482	\$85,106
<i>Krome Ave/SW 145th St.</i>	52,428	\$85,973
<i>Krome Ave./SW 152nd St.</i>	51,120	\$85,280
<i>SW 152nd St./SW 162nd Ave.</i>	54,025	\$85,935
<i>SW 167th Ave./Howard Dr.</i>	58,715	\$84,947

City Park – Primary Trade Area Map – Commercial Center Locations



City Park – Secondary Trade Area Map – Commercial Center Locations



^[1] Sources: Geod; GrowthFactor; SegmentSpot; ESRI; ICSC

13. **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**

Response: The Applicant respectfully disagrees that the City Park development's characterization as a Transit-Oriented Development (TOD) is dependent upon the existence of future commuter rail service on the CSX Portland Spur.

The City Park development has been planned consistent with the State of Florida's definition of a Transit-Oriented Development contained in Section 163.3164(49), Florida Statutes, which defines TOD as:

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The Applicant has revised the Application for Development Approval to clarify that City Park is not predicated upon future commuter rail service on the CSX Portland Spur.

Rather, the project's Transit-Oriented Development characteristics are derived from its compact, mixed-use, walkable, bicycle-friendly, and transit-supportive design, consistent with Section 163.3164(49), Florida Statutes, and its proximity to existing and planned transit facilities within the South Dade Transitway corridor.

- 14. 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.**

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- 15. 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.**

Response: There is a 12-inch water main directly abutting the subject property within NW 162nd Avenue. Per MDWASD the development shall connect to this main as required that directly abuts the project. The total flow will be dependent on the total connections to the main and will be determined by MDWASD when the final WASD Agreement is offered.

There is a 24-inch sanitary force main at the intersection of SW 160th Avenue and SW 152nd Street. The project will extend a force main approximately 775 feet from the southeast corner of the subject property to this point of connection. The total flow will be dependent on the total connections to the main and will be determined by MDWASD when the final WASD Agreement is offered.

In regard to the CSX Portland Spur, see response to comment 9., above, and response to Miami-Dade County's First Statement of Information Needed, Comment 11, Page 9.

- 16. 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 / 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)**

Response: Please see response to comment 10, above.

Question 18. Wastewater Management

- 17. The Water and Sewer table in Attachment A contains an incorrect mix of residential units. Revised Attachment not found in resubmittal**

Response: The water and sewer table in Attachment A has been corrected.

18. The attached survey is illegible and lacks bearings and distances and match lines or a key map. Revised Attachment not found in resubmittal

Response: A hard copy of the survey was delivered to Alex Dambach, RER Planning and Development Management. In addition, a legible electronic version has been filed in the Miami-Dade County Energov portal under Plan Number: Z2025000221.

Question 21. Transportation

19. 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.

Second review comment: 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.

Response: See response to comment 9, above, and response to Miami-Dade County's First Statement of Information Needed, Comment 11, Page 9.

The Applicant respectfully disagrees that the City Park development's characterization as a Transit-Oriented Development (TOD) is dependent upon the existence of future commuter rail service on the CSX Portland Spur.

The City Park development has been planned consistent with the State of Florida's definition of a Transit-Oriented Development contained in Section 163.3164(49), Florida Statutes, which defines TOD as:

"A project or projects, in areas identified in a local government comprehensive plan, that is or will be served by existing or planned transit service. These areas shall be compact, moderate to high density developments, of mixed-use character, interconnected with other land uses, bicycle and pedestrian friendly, and designed to support frequent transit service operating through, collectively or separately, rail, fixed guideway, streetcar, or bus systems on dedicated facilities or available roadway connections."

The City Park Master Development Plan embodies these characteristics independent of any future rail service on the CSX Portland Spur. Specifically, the project includes:

- A compact, mixed-use development pattern consisting of residential, retail, office, civic, educational, recreational, and employment-generating uses;
- Residential densities exceeding the minimum density requirements applicable to UDB expansion areas;
- A walkable community design organized around mixed-use centers and neighborhood-serving destinations;
- An interconnected street, pedestrian, bicycle, trail, and greenway network designed to facilitate non-automobile travel;

- Land use patterns that place housing, employment, schools, parks, and commercial services in close proximity to one another; and
- Development designed to support transit service operating on existing and future roadway corridors.

Importantly, Section 163.3164(49), F.S., does not require that a TOD be served by rail transit. The statutory definition expressly recognizes that frequent transit service may be provided through rail, fixed guideway, streetcar, or bus systems operating on dedicated facilities or available roadway connections. Accordingly, a development may satisfy the statutory characteristics of a TOD without being dependent upon commuter rail service.

The Applicant acknowledges that no commuter rail service is currently proposed or committed on the CSX Portland Spur and that the development approval does not rely upon the implementation of such service. References to the Portland Spur in the Application for Development Approval were intended to identify a potential long-term transportation opportunity within the broader South Dade area rather than a transportation improvement upon which the project depends.

The Applicant has revised the Application for Development Approval to clarify that City Park is not predicated upon future commuter rail service on the CSX Portland Spur. Rather, the project's Transit-Oriented Development characteristics are derived from its compact, mixed-use, walkable, bicycle-friendly, and transit-supportive design, consistent with Section 163.3164(49), Florida Statutes, and its proximity to existing and planned transit facilities within the South Dade Transitway corridor.

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

Second review comment: 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)

Response: Please see response to comment 10, above.

This request goes beyond the level of detail required at the Application for Development Approval (ADA) stage. Detailed pedestrian connectivity and first/last-mile analysis can be provided during site plan review process

21. 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.

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 21R1-42 still references this project as a TOD, with a node aligned with the CSX Portland Spur and SMART PLAN.

Response: The text referring to the CSX Portland Spur project has been removed from Q21.

- 22. 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**

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%.

Response: The proposed 5% reduction in vehicle trip generation for non-auto modes of transportation (transit, bicycle, and pedestrian) is well-supported by County policy, project-specific design commitments, and acceptance by other reviewing agencies. This reduction is conservative relative to the County's own adopted mode share data for the project's Context Zone and reflects the transformative multimodal infrastructure planned for this undeveloped site.

Miami-Dade County Code of Ordinances Chapter 33E establishes multimodal reductions for all land uses and incorporates context-sensitive mode shares. The project is located in Context Zone 3 for which the adopted mode split is:

- o 88.7% automobile
- o 5.7% transit

- o 5.6% bicycle/pedestrian

This equates to an 11.3% non-automobile mode share.

The proposed 5% vehicle trip reduction is less than half of the County's adopted non-auto share for this zone. It is a prudent, conservative application of the County's own multimodal framework, particularly appropriate for a site where current census-based mode shares (approximately 2.2% non-auto in western/unincorporated areas) understate future conditions due to planned investments.

Chapter 33E's mobility fee structure and mode share data were developed precisely to incentivize and credit developments that provide multimodal options, moving beyond outdated auto-centric assumptions.

This reduction is further justified by the Project's transformative multimodal infrastructure, including a dedicated mobility hub accommodating at least two Miami-Dade County bus routes. The project will coordinate with MDC transit to develop the specific routes, headways, and stop locations. The inclusion of the Hub and specific bus routes will be included as part of the Development Order (DO). In addition, the project will provide an extensive internal network designed to make non-auto travel convenient and safe:

- Bike lanes: ~23 miles
- Bike routes: ~1.5 miles
- Off-street shared-use trails (pedestrians/cyclists): ~9 miles
- Sidewalks: ~24 miles

These facilities create a comprehensive, connected system far beyond standard requirements. Combined with the on-site mobility hub and the project's 1,000-acre scale, this infrastructure directly supports and is expected to achieve or exceed the County's adopted 11.3% non-auto mode share.

The 5% reduction has been reviewed, and no concerns were raised by FDOT, the Greater Miami Expressway Agency, and the South Florida Regional Planning Council. Their concurrence confirms the reduction is reasonable and consistent with regional transportation planning standards for DRIs.

In summary, the 5% reduction is conservative, directly supported by Chapter 33E's Context Zone 3 mode shares (11.3% non-auto), justified by the project's superior multimodal infrastructure and mobility hub, and already accepted by FDOT and SFRPC. It represents a balanced, evidence-based approach that advances the County's goals of reducing vehicle dependency.

23. 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%.

Response: The proposed 5% reduction in vehicle trip generation for non-auto modes of transportation (transit, bicycle, and pedestrian) is well-supported by County policy, project-specific design commitments, and acceptance by other reviewing agencies. This reduction is conservative relative to the County's own adopted mode share data for the project's Context Zone and reflects the transformative multimodal infrastructure planned for this undeveloped site.

Miami-Dade County Code of Ordinances Chapter 33E establishes multimodal reductions for all land uses and incorporates context-sensitive mode shares. The project is located in Context Zone 3 for which the adopted mode split is:

- 88.7% automobile
- 5.7% transit
- 5.6% bicycle/pedestrian

This equates to an 11.3% non-automobile mode share.

The proposed 5% vehicle trip reduction is less than half of the County's adopted non-auto share for this zone. It is a prudent, conservative application of the County's own multimodal framework, particularly appropriate for a site where current census-based mode shares (approximately 2.2% non-auto in western/unincorporated areas) understate future conditions due to planned investments.

Chapter 33E's mobility fee structure and mode share data were developed precisely to incentivize and credit developments that provide multimodal options, moving beyond outdated auto-centric assumptions.

This reduction is further justified by the Project's transformative multimodal infrastructure, including a dedicated mobility hub accommodating at least two Miami-Dade County bus routes. The project will coordinate with MDC transit to develop the specific routes, headways, and stop locations. The inclusion of the Hub and specific bus routes will be included as part of the Development Order (DO). In addition, the project will provide an extensive internal network designed to make non-auto travel convenient and safe::

- Bike lanes: ~23 miles
- Bike routes: ~1.5 miles
- Off-street shared-use trails (pedestrians/cyclists): ~9 miles
- Sidewalks: ~24 miles

These facilities create a comprehensive, connected system far beyond standard requirements. Combined with the on-site mobility hub and the project's 1,000-acre scale,

this infrastructure directly supports and is expected to achieve or exceed the County's adopted 11.3% non-auto mode share.

The 5% reduction has been reviewed, and no concerns were raised by FDOT, the Greater Miami Expressway Agency, and the South Florida Regional Planning Council. Their concurrence confirms the reduction is reasonable and consistent with regional transportation planning standards for DRIs.

In summary, the 5% reduction is conservative, directly supported by Chapter 33E's Context Zone 3 mode shares (11.3% non-auto), justified by the project's superior multimodal infrastructure and mobility hub, and already accepted by FDOT and SFRPC. It represents a balanced, evidence-based approach that advances the County's goals of reducing vehicle dependency.

- 24. 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.

Response: The internal capture rate of 39.5% between residential and school uses was previously reviewed, discussed, and accepted as part of the methodology in the Agreement to Delete Questions dated May 8, 2025. The approved Agreement to Delete is included in Appendix A of Q21 - Transportation. This agreement reflects the consensus reached among all parties regarding the level of analysis required for this project. Therefore, this internal capture rate will not be changed for the analysis.

- 25. 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.

Response: Committed development trips were based on data provided directly by Miami-Dade County staff (see documentation attached to these responses after page 40).

As outlined in the Agreement to Delete, future background traffic was developed using existing volumes from the concurrency tables and an approved area-wide growth rate and committed development traffic provided by MDC staff.

As requested, Tables 21.D2 and 21.E1 were revised to include count station numbers.

- 26. 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.

The City Park DRI traffic study (Table 21.F.1) identifies the offsite roadway improvements required to mitigate the project's traffic impacts. As noted in the table, these improvements will be the responsibility of the maintaining agencies or the project.

For the project to proceed, the Miami-Dade County Board of County Commissioners (BCC) must first approve the inclusion of the City Park lands into the Urban Development Boundary (UDB). The specific roadway infrastructure obligations to be provided by the applicant will be clearly defined in the Development Order.

The project will fully mitigate its traffic impacts by either (1) constructing the required improvements directly, (2) paying its proportionate share of the costs, or (3) contributing through the Multimodal/Mobility Impact Fee program. Once the application is deemed sufficient, the applicant will coordinate with Miami-Dade County to establish the final priority, timing, and payment mechanisms for these improvements consistent with the Development Order and County requirements.

This approach ensures that all necessary infrastructure will be in place to support the project's development timeline.

- 27. 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.

Response: The project team acknowledges the agencies' position that the provision of CSX railroad crossings is critical to the feasibility of the project. The client is actively coordinating with CSX to secure the necessary railroad crossings. These discussions are ongoing, and the client is committed to obtaining the required approvals and constructing the crossings as part of the project.

Should the crossings not be secured with CSX prior to permitting, the project team may need to revise the traffic analysis, as the project's traffic distribution could be altered. It is the client's understanding that a condition in the proposed Development Order will address this concern.

Question 23. Hurricane Preparedness

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:

- 28. 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.

Response: The Applicant acknowledges DEM's comment. The planned on-site high school is intended to serve a dual purpose as both an educational facility and a hurricane evacuation shelter. For purposes of demonstrating shelter-space sufficiency, DEM has identified a required offset of 1,114 potential evacuees.

The American Red Cross shelter planning guidance uses 40 square feet per shelter resident as a standard planning guideline. The guidance also recognizes that, during hurricane conditions and on a short-term basis, shelter space may be reduced, ideally to no less than 20 square feet per person, provided adequate space is reserved for registration, health services, safety, and fire considerations.

Using the more conservative 40 square feet per person planning guideline, the required usable shelter area is:

$$1,114 \text{ evacuees} \times 40 \text{ SF/person} = 44,560 \text{ SF of usable shelter area}$$

The proposed high school is planned for approximately 1,640 student stations. Based on MDCPS's current prototype facility service delivery standard of 95.7 net square feet per permanent high school student station, the high school would be expected to include approximately:

$$1,640 \text{ student stations} \times 95.7 \text{ net SF/student station} = 156,948 \text{ net SF}$$

This demonstrates that the planned high school facility is expected to contain substantially more net building area than the 44,560 square feet needed to offset DEM's identified shelter demand at the conservative 40-square-foot-per-person planning standard. Stated differently, the required shelter area represents approximately 28.4% of the anticipated high school net facility area:

$$44,560 \text{ SF} \div 156,948 \text{ net SF} = 28.4\%$$

Accordingly, the high school program is large enough to reserve and identify eligible interior shelter areas — such as the gymnasium, cafeteria/dining area, media center, multipurpose rooms, and other structurally suitable interior areas — sufficient to accommodate at least 1,114 evacuees. Final eligible shelter areas will be determined through design coordination with Miami-Dade County Public Schools, Miami-Dade DEM, and applicable building, fire, life-safety, and emergency management review agencies.

ARC HESSS Shelter-Space Consistency

ARC HESSS Shelter-Space Consideration	Project Response
Shelter residents should be allocated adequate space.	The Project uses the conservative ARC planning guideline of 40 SF per shelter resident.
Required shelter space for DEM offset.	1,114 evacuees × 40 SF/person = 44,560 SF of usable shelter area.
Facility size available to support shelter use.	The high school is planned for 1,640 student stations, equivalent to approximately 156,948 net SF using the MDCPS 95.7 net SF/student station standard.

Support areas must be provided.	Final design will reserve adequate areas for registration, health services, safety, fire access, restrooms, circulation, and shelter operations.
Short-term hurricane shelter use.	The facility is intended for hurricane evacuation shelter use, consistent with the short-term pre-storm evacuation shelter function recognized by the Red Cross.
Final suitability review.	The Applicant will coordinate with MDCPS, DEM, and applicable agencies to confirm eligible shelter areas, structural suitability, code compliance, flood/storm-surge considerations, access, and operations requirements.

Therefore, based on the planned high school capacity and MDCPS prototype facility standard, the on-site high school is expected to provide sufficient eligible shelter area to offset at least 1,114 potential evacuees. The Project will include an appropriate commitment that the high school be designed and coordinated for dual use as a hurricane evacuation shelter, with not less than 44,560 square feet of usable shelter area, subject to final design and review for consistency with ARC HESSS and applicable County emergency management requirements.

Source Notes: MDCPS prototype facility service delivery standard: 95.7 net SF per permanent high school student station. ARC HESSS shelter-space planning assumption: 40 SF per shelter resident, with short-term hurricane shelter space recognized at lower planning levels where support and life-safety functions are addressed.

Question 27. Education

- 29. 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.**

Response: Noted. Please see response to comment 30, below.

- 30. 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.**

The Applicant has coordinated directly with Miami-Dade County Public Schools (MDCPS) to evaluate the school enrollment impacts associated with the proposed development. Subsequent to submission of the application, MDCPS completed a Preliminary Concurrency Analysis for Application No. PH3026052600245 (May 26, 2026), utilizing the School District's current student generation methodology, concurrency service areas, available capacity calculations, and school choice adjustment factors.

The MDCPS analysis evaluated the City's proposed residential development program consisting of 7,800 dwelling units, including 1,029 single-family detached units, 4,532 single-family attached units, and 2,239 multifamily units. Based upon the School District's adopted methodology, MDCPS determined that the development would generate

approximately 1,890 students, consisting of 892 elementary students, 457 middle school students, and 541 senior high school students. MDCPS applied an impact reduction factor of 35.54 percent to account for charter schools and magnet schools (Schools of Choice), consistent with its standard concurrency review procedures.

The Applicant has revised the School Site Planning, Student Generation, and Education Element Consistency Analysis to utilize the student generation figures prepared by MDCPS. Accordingly, the analysis now relies upon the School District's official methodology rather than independent assumptions or projections. This ensures consistency between the development program evaluated by MDCPS and the student generation estimates used in the Application for Development Approval.

Importantly, MDCPS concluded that sufficient public school capacity exists to serve the proposed development through a combination of schools within the Concurrency Service Area and adjacent service areas. The Preliminary Concurrency Analysis identified adequate middle school and senior high school capacity and demonstrated that elementary school demand can be accommodated through the School District's concurrency management process and adjacent service area capacity. MDCPS further stated that a final determination of public school concurrency and capacity reservation will be made at the time of plat, site plan, or functional equivalent approval.

In addition, the City Park Master Development Plan reserves land sufficient to accommodate approximately 3,863 student stations, including an elementary school, middle school, and senior high school. Based on the MDCPS student generation projections of 1,890 students, the planned educational facilities would provide capacity substantially exceeding projected student demand.

Accordingly, the Applicant believes the requested information has been provided and that the development program, student generation analysis, and school planning assumptions are now fully consistent with the methodology utilized by Miami-Dade County Public Schools and the public school concurrency review process.

31. **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.**

Response: The Applicant acknowledges the referenced November 5, 2025 MDCPS

Preliminary Concurrency Analysis and notes that the School District has subsequently completed an updated Preliminary Concurrency Analysis dated May 26, 2026, reflecting the current residential development program and the student generation methodology in effect at the time of review. The updated MDCPS analysis determined that the proposed 7,800-unit development would generate 892 elementary students, 457 middle school students, and 541 senior high school students, for a total of 1,890 students. The revised student generation estimates reflect MDCPS's current methodology and supersede earlier preliminary calculations prepared during prior stages of the review process.

With respect to school capacity, the Applicant recognizes that both the 2025 and 2026 MDCPS analyses identify a combination of Concurrency Service Area (CSA) schools and adjacent service area schools to accommodate projected student enrollment. This is the standard approach utilized by MDCPS under the School Concurrency Management System when evaluating available capacity and does not represent a determination of future school assignments, attendance boundaries, or actual student travel patterns. School concurrency analyses are intended to evaluate systemwide capacity availability and compliance with adopted level-of-service standards rather than to assign future students to specific schools.

Accordingly, the references to Miami Heights Elementary School, Jack David Gordon Elementary School, Dr. Gilbert L. Porter Elementary School, and Miami Sunset Senior High School should not be interpreted as future attendance assignments for City Park residents. Attendance boundaries, school assignments, school choice participation, and future educational facility planning remain under the authority of Miami-Dade County Public Schools and are subject to change over time based on enrollment trends, capital improvements, boundary adjustments, school choice programs, and the construction of new educational facilities.

Importantly, the City Park Master Development Plan reserves land sufficient to accommodate an elementary school, middle school, and senior high school with a combined planned capacity of approximately 3,863 student stations. The reservation of school sites within the development provides MDCPS with future opportunities to serve students generated by the project within the community and in closer proximity to residences than is assumed in the preliminary concurrency analyses. The conceptual school sites are intended to preserve flexibility for future coordination with MDCPS regarding school type, location, timing, and capacity.

The purpose of the Applicant's school analysis is therefore not to establish specific school assignments but to demonstrate that: (1) MDCPS has reviewed the development using its adopted concurrency methodology; (2) the School District has determined that sufficient public school capacity exists to serve the project through the concurrency system; and (3) the Master Development Plan reserves land sufficient to accommodate future educational facilities within the development should MDCPS determine such facilities are needed.

Therefore, the identification of schools located several miles from the project site in the MDCPS concurrency analyses does not indicate an adverse impact unique to City Park, but rather reflects the School District's countywide capacity management methodology and existing attendance boundary structure at the time of review. Future school assignments and service patterns will be determined by MDCPS through its ongoing educational facilities planning process.

- 32. 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.**

Response: Please see response to comment 30, above.

- 33. 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."**

Response: The Applicant appreciates the recommendation and has actively coordinated with Miami-Dade County Public Schools (MDCPS) throughout the review process. As demonstrated by the Preliminary Concurrency Analysis completed by MDCPS on May 26, 2026, the School District has reviewed the proposed development program and determined that sufficient public school capacity exists to serve the project through the School Concurrency Management System. Further coordination with MDCPS will continue as the project advances through subsequent phases of development review and implementation.

Importantly, City Park has been planned to accommodate educational facilities within the development itself. The Master Development Plan reserves land sufficient to accommodate an elementary school, middle school, and senior high school with a combined planned capacity of approximately 3,863 student stations. This planned capacity significantly exceeds the 1,890 students projected by MDCPS to be generated by the development and provides a substantial opportunity for MDCPS to serve future students within the community should the School District determine that such facilities are warranted. Accordingly, the project has already incorporated the reservation of school sites as an integral component of the community design.

The Applicant respectfully notes that decisions regarding school construction, school site acquisition, school funding, attendance boundaries, and educational facility programming are made exclusively by MDCPS pursuant to its adopted capital planning and school concurrency processes. While the Applicant remains willing to continue discussions with MDCPS regarding future educational needs, it would be premature at the DRI stage to commit to specific land conveyances, facility construction, or other contributions absent a determination by MDCPS that such measures are necessary or desired.

With respect to the statement that City Park is intended to be a community where residents can "live, work, play, and learn," the Applicant believes the Master Development Plan fully supports that objective. The plan includes reserved school sites, civic uses, parks and recreational facilities, employment-generating office and industrial uses, neighborhood-serving retail and commercial uses, and an interconnected pedestrian and bicycle network designed to support daily activities within the community. The inclusion of three conceptual school sites and the reservation of land sufficient to accommodate elementary, middle, and senior high school facilities directly supports the "learn" component of that vision.

Furthermore, the schools identified in the MDCPS concurrency analysis are not intended to represent future attendance assignments for City Park residents. Rather, they reflect

the School District's current capacity management methodology and the availability of seats within existing Concurrency Service Areas and adjacent service areas at the time of review. Future attendance boundaries, school assignments, school choice participation, and potential new school facilities will be determined by MDCPS through its ongoing educational planning process.

Accordingly, the Applicant submits that the project is consistent with its stated vision of creating a complete community where residents can live, work, play, and learn. The Master Development Plan reserves substantial land for educational facilities, provides sufficient capacity to accommodate projected student demand, and preserves flexibility for continued coordination with MDCPS regarding future educational needs.

- 34. 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.**

Response: Policy EDU-3A provides guidance regarding the location of schools within the Urban Development Boundary (UDB), including preferred distances from the UDB for elementary, middle, and high schools.

Upon approval of the proposed CDMP amendment, the City Park property would be located within the Urban Development Boundary. Consequently, all conceptual school sites would be located within the urban service area and would satisfy the primary objective of EDU-3A, which is to ensure that public schools serving urban growth are located within the UDB.

- 35. 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 the will "coordinate with DEM" does not address the referenced issues raised, and more information is required.**

Response: In regard to Question 23 – Hurricane Preparedness, please see the Applicant's response to MDC comment 28. In regard to wildlife survey, please see the response to Question 12 – Vegetation and Wildlife that found the Project Site is used for row crops and lacks natural vegetative communities. It was further found that no state or federally listed plant and wildlife resources were documented within the Project Site nor any natural habitat areas that would encourage wildlife utilization.

- 36. 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.**

Response: Acknowledged.

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

Response: This comment was fully addressed in the Applicant's response to SIN1 MDC item 74, page 12 and is repeated below for reference

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

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

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

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

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

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

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

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

Question 21. Transportation

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

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

Response: The supporting data requested was previously provided in Appendix 21-2 of the ADA report. This same level of documentation was made available to all reviewing agencies. We are pleased to confirm that FDOT, GMX, and SFRPC have successfully located and utilized the information in order to complete their respective reviews without issue.

- 39. Section B (Trip Generation):**

- a. 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.

Response: The proposed 5% reduction in vehicle trip generation for non-auto modes of transportation (transit, bicycle, and pedestrian) is well-supported by County policy, project-specific design commitments, and acceptance by other reviewing agencies. This reduction is conservative relative to the County's own adopted mode share data for the project's Context Zone and reflects the transformative multimodal infrastructure planned for this undeveloped site.

Miami-Dade County Code of Ordinances Chapter 33E establishes multimodal reductions for all land uses and incorporates context-sensitive mode shares. The project is located in Context Zone 3 for which the adopted mode split is:

- 88.7% automobile
- 5.7% transit
- 5.6% bicycle/pedestrian
- This equates to an 11.3% non-automobile mode share.

The proposed 5% vehicle trip reduction is less than half of the County's adopted non-auto share for this zone. It is a prudent, conservative application of the County's own multimodal framework, particularly appropriate for a site where current census-based mode shares (approximately 2.2% non-auto in western/unincorporated areas) understate future conditions due to planned investments.

Chapter 33E's mobility fee structure and mode share data were developed precisely to incentivize and credit developments that provide multimodal options, moving beyond outdated auto-centric assumptions.

This reduction is further justified by the Project's transformative multimodal infrastructure, including a dedicated mobility hub accommodating at least two Miami-Dade County bus routes. The project will coordinate with MDC transit to develop the specific routes, headways, and stop locations. The inclusion of the Hub and specific bus routes will be included as part of the Development Order (DO). In addition, the project will provide an extensive internal network designed to make non-auto travel convenient and safe: Bike lanes: ~23 miles

- Bike routes: ~1.5 miles
- Off-street shared-use trails (pedestrians/cyclists): ~9 miles
- Sidewalks: ~24 miles

These facilities create a comprehensive, connected system far beyond standard requirements. Combined with the on-site mobility hub and the project's 1,000-acre scale, this infrastructure directly supports and is expected to achieve or exceed the County's adopted 11.3% non-auto mode share.

The 5% reduction has been reviewed, and no concerns were raised by FDOT, the Greater Miami Expressway Agency, and the South Florida Regional Planning Council. Their concurrence confirms the reduction is reasonable and consistent with regional

transportation planning standards for DRIs.

In summary, the 5% reduction is conservative, directly supported by Chapter 33E's Context Zone 3 mode shares (11.3% non-auto), justified by the project's superior multimodal infrastructure and mobility hub, and already accepted by FDOT and SFRPC. It represents a balanced, evidence-based approach that advances the County's goals of reducing vehicle dependency.

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

Response: The land use equivalency matrix is provided in Question 21.B.3 (Table 21.B.2) of the ADA report. The matrix is intended to provide flexibility in implementing the Development Order by allowing adjustments among approved land use types—such as residential, retail, office and industrial—while maintaining equivalent impacts on public facilities and infrastructure as originally evaluated. This tool will ensure that the project can respond to future market conditions and development demands without requiring a formal amendment, provided that any land use conversions remain within the parameters established by the DRI approval and do not increase impacts on transportation.

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

Response: Table 21.B1 reflects a 3.2% overall internal capture rate for the entire development. The 39.5% internal capture rate specifically applies to school-to-residential trips only, as documented in the Agreement to Delete Questions. The table has been revised to show the 39.5% internalization. Supporting documentation is available in Appendix 21.4.

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

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.

Response: The internalization between school and residential uses was previously

reviewed and explicitly approved by the reviewing agencies. Therefore, this internal capture rate will not be changed for the analysis

The approved methodology is documented in the Agreement to Delete Questions dated May 8, 2025, which is included in Appendix A of Q21 - Transportation. This agreement reflects the consensus reached among all parties regarding the level of analysis required for this project.

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

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.

Response: The proposed 5% reduction in vehicle trip generation for non-auto modes of transportation (transit, bicycle, and pedestrian) is well-supported by County policy, project-specific design commitments, and acceptance by other reviewing agencies. This reduction is conservative relative to the County's own adopted mode share data for the project's Context Zone and reflects the transformative multimodal infrastructure planned for this undeveloped site.

Miami-Dade County Code of Ordinances Chapter 33E establishes multimodal reductions for all land uses and incorporates context-sensitive mode shares. The project is located in Context Zone 3 for which the adopted mode split is:

- 88.7% automobile
- 5.7% transit
- 5.6% bicycle/pedestrian

This equates to an 11.3% non-automobile mode share.

The proposed 5% vehicle trip reduction is less than half of the County's adopted non-auto share for this zone. It is a prudent, conservative application of the County's own multimodal framework, particularly appropriate for a site where current census-based mode shares (approximately 2.2% non-auto in western/unincorporated areas) understate future conditions due to planned investments.

Chapter 33E's mobility fee structure and mode share data were developed precisely to incentivize and credit developments that provide multimodal options, moving beyond outdated auto-centric assumptions.

This reduction is further justified by the Project's transformative multimodal infrastructure, including a dedicated mobility hub accommodating at least two Miami-Dade County bus

routes, plus an extensive internal network designed to make non-auto travel convenient and safe:

- Bike lanes: ~23 miles
- Bike routes: ~1.5 miles
- Off-street shared-use trails (pedestrians/cyclists): ~9 miles
- Sidewalks: ~24 miles

These facilities create a comprehensive, connected system far beyond standard requirements. Combined with the on-site mobility hub and the project's 1,000-acre scale, this infrastructure directly supports and is expected to achieve or exceed the County's adopted 11.3% non-auto mode share.

The 5% reduction has been reviewed, and no concerns were raised by FDOT, the Greater Miami Expressway Agency, and the South Florida Regional Planning Council. Their concurrence confirms the reduction is reasonable and consistent with regional transportation planning standards for DRIs.

In summary, the 5% reduction is conservative, directly supported by Chapter 33E's Context Zone 3 mode shares (11.3% non-auto), justified by the project's superior multimodal infrastructure and mobility hub, and already accepted by FDOT and SFRPC. It represents a balanced, evidence-based approach that advances the County's goals of reducing vehicle dependency.

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

Response: The growth rate used in the analysis was approved as part of the methodology in the Agreement to Delete. The approved methodology is documented in the Agreement to Delete Questions dated May 8, 2025, which is included in Appendix 21-1 of Q21 - Transportation. This agreement reflects the consensus reached among all parties regarding the level of analysis required for this project. The SERPM documentation referenced in the comment above was included in the Q21 Appendix 21-5 for reference purposes only as back up information.

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

the funding responsibility of the entity that has maintenance responsibility for the facility, the development's proportionate share shall be calculated to mitigate the impacts to at least background conditions.

Response: Comment noted. As previously mentioned, the proportionate share calculations will be provided once the traffic study is found sufficient and will be finalized in the Development Order.

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

Response: Map J-E1 was reviewed. The distribution is consistent with the results of the SERPM model.

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

Response: A standard traffic impact study is not required at this stage. The analysis follows the methodology outlined in the Agreement to Delete document that was approved for the DRI study. This information will be provided during the site plan approval.

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

Response: Comment noted.

Transportation Planning and Policy Division

Question 21 - Transportation

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

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

Response: As previously mentioned, detailed trip generation documentation is provided in Appendix 21-4.

- 50. Section F - Highway Network Modifications: NOT Sufficient- Needs more information. Table 21.F.1 identifies roadway segments with deficiencies and**

describes responsibility per statute. However, the response is not clear on which improvements are DRI-triggered (Can assume it is the last set of improvements listed, but it is not clear) or the timing of such improvements, as required by the question. **Missing Information:**

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

Response: This information will be provided as part of the proposed Development Order once the project is found sufficient.

b. State when DRI-related improvements are required

Response: This information will be provided as part of the proposed Development Order once the project is found sufficient.

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

Response: This information will be provided as part of the proposed Development Order once the project is found sufficient.

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

Response: An exhibit (Map J-G1) showing the recommended access locations and configurations is provided in Section G. Additionally, an exhibit (Map J-G2) showing the project volumes at the proposed driveways is also provided in Section J.

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

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

Response: This level of detail is not required at the ADA stage of the DRI process. However, Maps J-G1 and J-G2 showing the approximate driveway locations, median control, spacing, and project volumes along SR 997 / Krome Avenue are provided in the response to DRI Question 21 G.

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

Response: Comment noted.

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

a. Need to develop the response for Section H:

b. Identify any designated transportation corridors in MDC's Comprehensive Plan.

c. Explain how the project supports protection or enhancement of those corridors.

d. Specify right-of-way dedications, setbacks, or interlocal agreements proposed.

Response: Please refer to Section Q21.B.3 of the revised ADA report.

54. 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

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 have been removed from Q21. The Project's viability does not depend on this facility.

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

Response: The project will coordinate with MDC transit to develop the specific routes, headways, and stop locations. The inclusion of the Hub and specific bus routes will be included as part of the Development Order (DO).

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

Response: The project is committed to a robust Transportation Demand Management (TDM) program that goes well beyond promotional efforts. In addition to promoting staggered work schedules, flex time, work-from-home policies, and rideshare incentives, the applicant is incorporating significant multimodal infrastructure, including new bike lanes, enhanced pedestrian connectivity to communal spaces, a new transit hub, and expanded transit service to the area. These improvements are designed to meaningfully reduce single-occupancy vehicle trips and support the project's overall traffic mitigation strategy.

Specific TDM measures, performance standards, and implementation requirements will be clearly defined as conditions in the Development Order (DO). The project will coordinate with Miami-Dade County during the approval process to establish an

effective tracking and monitoring program, which can be incorporated into the DO.

This comprehensive approach ensures measurable benefits and accountability for TDM initiatives throughout the project's buildout.

- 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.**

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

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

Response: The project will coordinate with MDC transit to develop the specific routes, headways, and stop locations. Kiosk information will be provided during the site plan approval process.

Kansas Goodrum

From: Arce, Anamersy (DTPW) <anamersy.arce@miamidade.gov>
Sent: Wednesday, December 17, 2025 1:53 PM
To: Juan Espinosa; Sandanasamy, Vinod (RER)
Cc: Senespleda, Yamilet (DTPW); Rob Curtis; Graham Penn; Tim Plummer; Carmen Orozco; Guim, Raquel (RER)
Subject: RE: City Park DRI Q21/CDMP - Committed Developments - 21135

[EXTERNAL EMAIL]

Juan,

Please note that there are no committed developments within the study area.

Thank you,

Anamersy Arce
Traffic Engineer III
Traffic Engineering Division
Department of Transportation and Public Works
Miami-Dade County
111 NW 1st Street, Suite 1510, Miami Florida 33128-1970
Tel. (305) 375 – 1179 Fax (305) 372 – 6064
Email: Anamersy.Arce@miamidade.gov

From: Juan Espinosa <jespinosa@dplummer.com>
Sent: Wednesday, December 17, 2025 10:46 AM
To: Sandanasamy, Vinod (RER) <vinod.sandanasamy@miamidade.gov>; Arce, Anamersy (DTPW) <anamersy.arce@miamidade.gov>
Cc: Senespleda, Yamilet (DTPW) <yamilet.senespleda@miamidade.gov>; Rob Curtis <rob@curtisplanning.com>; Graham Penn <gpenn@brzoninglaw.com>; Tim Plummer <tplummer@dplummer.com>; Carmen Orozco <carmen.orozco@lennar.com>; Guim, Raquel (RER) <raquel.guim@miamidade.gov>
Subject: RE: City Park DRI Q21/CDMP - Committed Developments - 21135

Good morning Vinod and Anamersy,

As part of the City Park DRI Question 21 (Transportation) and the associated CDMP traffic studies, we need to include committed developments within the project area. Please provide, at your earliest convenience, a list of the projects that qualify as committed developments so that we can include them as background traffic in our analysis.

Best regards,

Juan Espinosa, PE
Senior Project Director



1750 Ponce de Leon Boulevard
Coral Gables, Florida 33134
305•447•0900
www.dplummer.com

Our offices will be closed from December 25, 2025 to January 1, 2026, so that our team may enjoy the holiday season with their families.



[EXTERNAL EMAIL] Exercise caution. Do not open attachments or click links from unknown senders or unexpected email

Kansas Goodrum

From: Juan Espinosa
Sent: Monday, June 8, 2026 11:46 AM
To: Kansas Goodrum
Subject: Fw: City Park DRI Q21/CDMP - Committed Developments - 21135
Attachments: CDMP Traffic Study for Portofino - 163.25 Acre Site 12 20 2023.pdf

Juan Espinosa, PE
DAVID PLUMMER & ASSOCIATES

From: Sandanasamy, Vinod (RER) <Vinod.Sandanasamy@miamidade.gov>
Sent: Wednesday, December 17, 2025 2:24:29 PM
To: Arce, Anamersy (DTPW) <Anamersy.Arce@miamidade.gov>; Juan Espinosa <jespinosa@dplummer.com>
Cc: Senespleda, Yamilet (DTPW) <Yamilet.Senespleda@miamidade.gov>; Rob Curtis <rob@curtisplanning.com>; Graham Penn <gpenn@brzoninglaw.com>; Tim Plummer <tplummer@dplummer.com>; Carmen Orozco <carmen.orozco@lennar.com>; Guim, Raquel (RER) <Raquel.Guim@miamidade.gov>; Davis, Rosa (RER) <Rosa.Davis@miamidade.gov>; Dambach, Alex (RER) <Alexander.Dambach@miamidade.gov>
Subject: RE: City Park DRI Q21/CDMP - Committed Developments - 21135

[EXTERNAL EMAIL]

Hi Juan,
There's one CDMP project that has to be included in the cumulative analysis. The project is called as Ferro/Portofino, the project number is CDMP20230017. Please see attached the traffic study for the project.
Best.

Vinod Sandanasamy AICP, PTP,
Strategic Transportation Planner
Miami-Dade County Department of Regulatory and Economic Resources
111 NW 1st Street, 12th Floor
Miami, FL 33128
Phone: 305 375-2855; Cell: 305 979-6764
vinod.sandanasamy@miamidade.gov

“Delivering Excellence Every Day”

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Sent: Wednesday, December 17, 2025 1:53 PM
To: Juan Espinosa <jespinosa@dplummer.com>; Sandanasamy, Vinod (RER) <Vinod.Sandanasamy@miamidade.gov>
Cc: Senespleda, Yamilet (DTPW) <Yamilet.Senespleda@miamidade.gov>; Rob Curtis <rob@curtisplanning.com>; Graham Penn <gpenn@brzoninglaw.com>; Tim Plummer <tplummer@dplummer.com>; Carmen Orozco

<carmen.orozco@lennar.com>; Guim, Raquel (RER) <Raquel.Guim@miamidade.gov>

Subject: RE: City Park DRI Q21/CDMP - Committed Developments - 21135

Juan,

Please note that there are no committed developments within the study area.

Thank you,

Anamersy Arce

Traffic Engineer III

Traffic Engineering Division

Department of Transportation and Public Works

Miami-Dade County

111 NW 1st Street, Suite 1510, Miami Florida 33128-1970

Tel. (305) 375 – 1179 Fax (305) 372 – 6064

Email: Anamersy.Arce@miamidade.gov

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Sent: Wednesday, December 17, 2025 10:46 AM

To: Sandanasamy, Vinod (RER) <vinod.sandanasamy@miamidade.gov>; Arce, Anamersy (DTPW) <anamersy.arce@miamidade.gov>

Cc: Senespleda, Yamilet (DTPW) <yamilet.senespleda@miamidade.gov>; Rob Curtis <rob@curtisplanning.com>; Graham Penn <gpenn@brzoninglaw.com>; Tim Plummer <tplummer@dplummer.com>; Carmen Orozco <carmen.orozco@lennar.com>; Guim, Raquel (RER) <raquel.guim@miamidade.gov>

Subject: RE: City Park DRI Q21/CDMP - Committed Developments - 21135

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Senior Project Director

DAVID PLUMMER & ASSOCIATES
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