

SOUTH FLORIDA REGIONAL PLANNING COUNCIL

Question 10. General Project Description

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

Response:

Housing Need

The Applicant respectfully acknowledges the comment; however, the statement that the City Park application relies on demand for single-family housing “alone” mischaracterizes the basis for the requested Urban Development Boundary (UDB) expansion.

The application does not rely exclusively on demand for any single housing type. Rather, the request is based on the County’s long-term need for a more complete and balanced land supply that can accommodate a range of housing types, employment-generating uses, retail and commercial services, civic uses, parks, open space, stormwater management, and resiliency infrastructure within a compact, master-planned community.

As for residential uses, City Park’s single-family detached (13% of total planned units) and townhomes (58% of total planned units) are sorely needed in the market, which is reflected in the projected depletion date for land for lower density housing in 2029. Providing single-family units in City Park will help the County retain working families who would otherwise leave Miami-Dade County to find suitable housing. City Park’s multifamily units will similarly add important residential supply to serve younger workers in this area of the County and will further support the appropriate functioning of the City Park community.

The multifamily component is also required by the CDMP. Policy LU-8H requires a development that expands the UDB for residential purposes to provide a minimum residential density of 10 dwelling units per gross acre. That minimum density necessarily requires a multifamily component to balance the lower-density single-family component and to achieve the compact, mixed-use development pattern required by the CDMP.

The discussion of single-family and townhomes is included because housing supply should not be evaluated only as an aggregate number of dwelling units. While the Miami-Dade County CDMP does not limit UDB expansion review to demand for any one housing type, it also does not require the County to treat all residential capacity as interchangeable. Capacity for multifamily development in urban centers, transit corridors, and redevelopment areas does not fully address the continued need for family-sized housing, including single-family detached, and single-family attached units. The cost of constructing of higher density multifamily housing is so much greater than townhomes and detached single-family units (even when the difference in finished land cost per unit is accounted for) that three- and four-bedroom units demanded by families forms a tiny

fraction of multifamily housing giving working families with children the unenviable choice of either moving into small units or leave the market for more affordable housing regions of the State and country altogether. As migration and school enrollment data indicates, many families are making the decision to leave.

The County's projections have long recognized that demand for housing is often bifurcated into at least two principal components: single-family and multifamily. In the latest County estimates of depletion, the administration estimates that the County will be able to sustain multifamily demand beyond 2040 with approximately 80 percent of this supply located in the highest density areas of the County, and with the exception of Hialeah and small South Miami, the 80 percent of unit capacity is concentrated within 10 coastal municipalities with the highest intensity and cost of construction. Staff estimates, however, that single-family capacity will be depleted by 2029, which is less than the ten years of demand called for in CDMP Policy LU-8G. As a result, the current UDB does not include sufficient land to accommodate projected residential demand across the full range of housing types needed by Miami-Dade County residents.

The Applicant's submitted technical analysis demonstrates why multifamily and single-family demand and capacity must be considered independently and must both satisfy the ten-year land supply test in order to be consistent with the core housing objectives of the CDMP and to benefit Miami-Dade's families and economy. Treating all residential capacity as interchangeable would mask the County's near-term depletion of single-family residential land and would fail to address the housing needs of families seeking lower density larger unit housing options within Miami-Dade County.

This approach is consistent with both state and regional planning policy. The State Comprehensive Plan encourages an attractive and functional mix of living, working, shopping, and recreational activities. Similarly, the SFRPC Strategic Regional Policy Plan recognizes that South Florida's housing supply should include a diverse mix of styles, locations, and prices, and that communities should provide opportunities for a mix of housing affordable to all income ranges.

As discussed in the Applicant's 1st Round Narrative Response filed March 23, 2026, the "needs" analysis required by Policy LU-8E is not mechanical in nature. There are circumstances where the County has recognized that it is appropriate to expand the UDB to accommodate a specific set of uses even where land may remain "available" for the broader land use category countywide or within the relevant subarea.

For example, the County approved the "Beacon Lakes" and "Shopyland" CDMP amendments in 2002, which involved expansions west of the Homestead Extension of Florida's Turnpike and north of SR 836. Those applications were approved despite the fact that the County did not project a generalized need for additional industrial land within the planning horizon. Instead, the need determinations were based on the conclusion that there was a need for the particular typology of industrial space proposed: warehouse and related industrial uses on large parcels to serve Miami International Airport and the Port of Miami.

The City Park application presents a similar circumstance. The Beacon Lakes and Shopyland amendments addressed the need for a specific type of industrial land in a specific location, even though the UDB included a mathematically adequate supply of

industrial acreage elsewhere. The existing supply simply did not meet the need for the particular use and location required.

City Park will fill a comparable need for West Kendall by creating a complete community offering jobs, a variety of housing, services, recreation, civic uses, and open space in a coordinated “town center” format. The Needs Analysis is very clear, there are no areas within the existing UDB that can accommodate this combination of uses at the scale, location, and level of planning proposed by City Park.

Accordingly, City Park’s inclusion of single-family detached, single-family attached/townhouse, and multifamily housing is not the sole basis for the application, but part of a broader mixed-use planning program.

Agricultural Land

In regard to agricultural land, the UF/IFAS evaluation does not support the conclusion that agricultural land in Miami-Dade County “is forecasted to be insufficient to sustain industry by 2030.” To the contrary, the study acknowledges that a decline in agricultural land can occur while maintaining a viable agricultural industry. The study projects that the acreage necessary to maintain an economically viable agricultural industry can decline over time, to approximately 64,800 acres in 2030, 60,900 acres in 2040, and 56,300 acres in 2050. These projections result in a trendline suggesting a loss of nearly 660 acres a year can be sustained. When compared to the 68,837 acres reported in the 2022 USDA Census of Agriculture, the projected minimum acreage need is approximately 4,000 acres lower by 2030 and approximately 12,500 acres lower by 2050.

Our independent review of the County’s LUMA dataset, and the CDMP FLUM, suggests an annual reduction of slightly less than 650 acres of agricultural land per year. These reductions can be attributed to a variety of land use conversions, including utility and transportation uses, which represent the largest share, as well as vacant land and residential development. Although the LUMA data is an entirely different dataset from the Census of Agriculture baseline used in the UF/IFAS Study, the agricultural land consumption trend reflected in the LUMA data is nearly identical to the trend reflected in the UF/IFAS analysis. See Figure 1, below.

The City Park average turnover of agricultural land to urban development will average a significantly lower 95 – 100 acres per year over a 10-year period, commencing in 2028 at the earliest. That conversion rate represents, at most, 15-16 percent per year over a discrete 10-year period of the above noted trendlines of both actual and projected annual agricultural land conversion.

The UF/IFAS report identified the USDA Census of Agriculture as “the most reliable information available on the agricultural sector” (page 75; UF/IFAS analysis) and is the primary baseline used by the UF/IFAS report for evaluating agricultural land availability and industry viability thresholds into the future. While the County’s LUMA dataset identified approximately 60,891 acres of agricultural land in 2022, the 2022 USDA Census of Agriculture reported 68,837 acres of land in farms, a difference of nearly 8,000 acres, or approximately 13 percent. Furthermore, the CDMP FLUM currently maps 67,876 acres as Agriculture land. See Figure 2, below. This discrepancy reflects differences in methodology and the fact that the USDA inventory includes agricultural lands associated with farm operations that may not be captured within the County’s land use mapping.

The available data does not support the conclusion that Miami-Dade County's agricultural industry would cease to be viable by 2030 or that the agricultural land base is approaching a critical threshold. Applying the reduction in agricultural acreage (approximately 4,460 acres) reflected in the LUMA dataset between 2022 and 2026 directly to the USDA Census baseline, the resulting agricultural acreage would be approximately 64,377 acres, only slightly below the UF/IFAS projection of 64,800 acres in 2030. Including the annual City Park agricultural land conversion rate of 95 – 100 acres, the resulting acreage still substantially exceeds the UF/IFAS 2040 projection of 60,900 acres, and is well above the UF/IFAS 2050 projection of 56,300 acres.

In this context, conversion of agricultural land from the City Park project is consistent with the projected decrease in the UF study and would not materially alter the conclusions of the UF/IFAS analysis regarding long-term agricultural viability. It can be concluded that the City Park project will not alter the County's ability to retain a substantial agricultural land base that exceeds the acreage projected to be necessary to sustain an economically viable agricultural industry for decades into the future.

Strategic Regional Policy Plan

Finally, the City Park project is consistent with Goal 12 and Policies 12.3 and 12.4 of the Strategic Regional Policy Plan, addressing "Rural & Agricultural Lands." While Goal 12 encourages the retention of the Region's rural lands and agricultural economy, it is not a blanket prohibition on the conversion of agricultural land to urban development. Policy 12.3 expressly recognizes that expansion of urban service areas into agricultural lands may be appropriate where: (1) the expansion is necessary to accommodate projected population growth; and (2) the development densities will be sufficient to support public transportation.

City Park satisfies both Policy 12.3 criteria. The project responds to Miami-Dade County's projected population growth and housing demand by providing 7,800 residential units, including a substantial supply of family-sized attached and detached single-family housing, in a compact mixed-use development pattern. The project is also planned at a density sufficient to support public transportation, with an overall residential density of approximately 10.6 dwelling units per acre.

City Park is also consistent with Policy 12.4, which provides that when land is converted from agriculture to urban uses, local governments should discourage sprawl development patterns and require urban design and density necessary to support pedestrian-orientation, public transportation, and the efficient provision of infrastructure. City Park is not proposed as a conventional low-density or single-use agricultural conversion. Rather, it is planned as a compact, mixed-use community with residential, commercial, office, employment, school, civic, park, and open space uses organized around complete streets, pedestrian and bicycle facilities, walkable neighborhoods, and a planned mobility/transit center.

This urban design framework supports pedestrian orientation, transit readiness, internal trip capture, and the efficient extension and provision of infrastructure. By concentrating development within a coordinated master-planned community rather than a scattered or low-density pattern, City Park directly addresses the anti-sprawl and infrastructure-efficiency principles reflected in Policy 12.4.

Accordingly, City Park does not conflict with Goal 12 or Policies 12.3 and 12.4. The project represents a planned, compact, transit-supportive, and infrastructure-efficient urban expansion that balances agricultural land considerations with the Region's need to accommodate long-term population growth and housing demand.

Question 11. Revenue Generation

2. **Commercial water/sewer revenue (p.11 R1-10) uses a wrong unit conversion. The narrative states that "136M gallons ÷ 100 CCF × \$8.61/CCF," treating CCF as 100 gallons. 1 CCF = 748 gallons. The correct analysis is $136,000,000 \div 748 \times \$8.61 =$ about \$1.57M for restaurants, not \$11.8M. With the 50% non-dining adder and vacancy factor, the corrected commercial total is about \$2.2M, not \$17.3M. Total annual water/sewer drops from \$25.8M to about \$10.8M, and the 10-year Table 11-1 figure is overstated by roughly \$70–80M.**

Response: The SFRPC is correct that the commercial water/sewer revenue calculation used an incorrect unit conversion. The calculation inadvertently treated one CCF as 100 gallons. One CCF equals approximately 748 gallons. As a result, the revenue estimate for the commercial water/sewer component was overstated.

The corrected calculation for the restaurant water/sewer revenue is as follows:

$136,000,000 \text{ gallons} \div 748 \text{ gallons per CCF} = \text{approximately } 181,818 \text{ CCF}$

$181,818 \text{ CCF} \times \$8.61 \text{ per CCF} = \text{approximately } \$1.57 \text{ million annually}$

After applying the 50% non-dining commercial adder and the applicable vacancy factor, the corrected commercial water/sewer revenue is approximately \$2.2 million annually, rather than the \$17.3 million previously shown.

This correction reduces the total annual water/sewer revenue estimate from approximately \$25.8 million to approximately \$10.8 million. Table 11-1 and the supporting narrative on Page 11 R1-10 will be revised accordingly. The 10-year revenue estimate will also be corrected to remove the resulting overstatement, which is approximately \$70 million to \$80 million over the 10-year analysis period.

This correction will be incorporated into the revised fiscal impact analysis.

3. **Building permit revenue (Table 11-1) shows \$63.4M, which is 2.25% of total development cost (TDC), not the stated 2.0% of hard cost. Since hard cost is normally below TDC, the correct figure should be at or below \$56.4M (2.0% × \$2.819B), not above it.**

Response: The SFRPC is correct that the prior calculation was tied to TDC rather than hard costs. This was due to an incorrect cell reference in the fiscal model. The model assumes hard costs equal 87.5% of TDC.

However, the Table 11-1 line item was intended to capture building permit revenue and related non-traffic impact fee revenue, not building permit fees alone. While project-specific fee calculations vary, the model applies a planning-level factor of 2.25% of hard costs, consisting generally of approximately 2.0% for building permit fees plus approximately 0.25% for related plan review, processing, surcharge, administrative, and other related fees.

Accordingly, the corrected calculation is as follows:

$\$2.819 \text{ billion TDC} \times 87.5\% \text{ hard-cost factor} \times 2.25\% \text{ building and other non-traffic impact fees} = \text{approximately } \55.5 million

This represents a reduction of approximately \$7.9 million from the previously reported \$63.4 million. Table 11-1 and the related narrative have been corrected to reflect the revised amount and to clarify that the revenue estimate is based on hard costs, not total development cost, and includes building permit revenue together with related non-traffic impact fee revenue.

The response to DRI Question 11. Revenue Generation has been adjusted accordingly.

- 4. Gasoline tax (p.11R1-9) assumptions don't reconcile. 7,800 HHs × 1.83 vehicles × 1.4 gal/day × 365 = 7.29M gal/yr, not the 6.0M used. At \$0.199/gal, corrected revenue is ~\$1.45M, not \$1.2M.**

Response: SFRPC comment is correct. The gasoline tax revenue calculation was not updated after the vehicle-per-household assumption was revised based on the project's residential unit mix.

Using the corrected assumption, the calculation should be:

$7,800 \text{ households} \times 1.83 \text{ vehicles per household} \times 1.4 \text{ gallons per day} \times 365 \text{ days} = \text{approximately } 7.29 \text{ million gallons per year}$

At \$0.199 per gallon, this results in estimated gasoline tax revenue of approximately \$1.45 million per year, rather than the previously reported \$1.2 million per year.

Accordingly, the annual gasoline tax revenue estimate will be increased by approximately \$250,000 per year. Page 11R1-9 and the related fiscal tables will be corrected to reflect the revised calculation and to reconcile the underlying assumptions.

Question 17. Water Supply

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

Response: Per the response to DRI Question 17. Water Supply:

- The Average Daily Demand (A.D.D.) is 1.528 MGD
- The Maximum Daily Demand is 5.846 MGD

- The Peak Hour Demand (450% of A.D.D.) is 0.286 MGH
- Expected non-potable water demand for irrigation is 0.57 MGD.

The following paragraphs have been revised to reflect the response to Question 17.

The proposed development will replace agricultural irrigation with a potable water system, with an estimated total water demand of approximately 5.9 MGD at full buildout. This demand includes residential, commercial, institutional, and landscape irrigation uses, and will be served by public water infrastructure in accordance with Miami-Dade County concurrency and utility service standards.

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

Accordingly, when existing agricultural groundwater withdrawals are considered, the proposed development does not represent a net new water demand of the full 5.9 MGD (plus 0.57 MGD non-potable water demand), but rather a managed replacement of an existing high-intensity irrigation use with a more efficient, regulated urban water use pattern. This transition supports long-term water resource sustainability, improved aquifer management, and consistency with Miami-Dade County's water supply planning and conservation objectives.

Question 19. Stormwater Management

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

Response: The nutrient loading analysis is broken out into areas per the SFWMD Methodology and the land uses identified by the Stormwater Management Academy of the University of Central Florida. A table was added to the Conceptual Stormwater Management Master plan showing the correlations between all land uses and the nutrient loading land uses.

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

Response: A table was added to the Conceptual Stormwater Management Master plan showing the correlations between all land uses and the nutrient loading land uses.

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

Response: The details of the swale and exfiltration trenches will be provided at the time of permitting. A conceptual site plan was added to the Conceptual Stormwater Management Master Plan.

Question 21. Transportation

- 8. The Maximum Service Volume (MSV) values still could not be verified for SW 177th Avenue/Krome Avenue from SW 312th Street to SW 328th Street. Please provide the requested information.**

Response: The MSVs were calculated based on the C4 Motor Vehicle Arterial Generalized Service Volume Tables from the Multimodal Quality/LOS Handbook published by FDOT. The peak directional table for a C4-urban general context roadway was used. For a directional 1-lane undivided state roadway at LOS E, the base MSV is 1,190 vph. An adjustment factor of 1.05 was applied to the northbound direction due to the exclusive right-turn lane. No adjustment was applied to the southbound direction, as it lacks exclusive right-turn lanes

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

Response: While both directions of this roadway segment include exclusive left-turn lanes, the northbound MSV is higher due to the additional exclusive right-turn lane in that direction. This results in a 1.05 adjustment factor applied only to the northbound MSV.

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

Response: The 394 and 460 volumes were sourced from the FDOT portable count station 878771 Synopsis data. The table in the report has been updated accordingly. Please see the revised Table 21.A.3.

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

Response: The committed development text has been revised.

- 12. For some context classifications, the LOS E threshold is not provided in the M/QLOS handbook. For these segments within these context classifications, LOS**

E were calculated based on the difference between LOS C and LOS D. M/QLOS handbook notes that LOS greater than LOS D is not applicable for these roadways, as volume greater than LOS D becomes F because intersection capacities have been reached.

Response: For context classifications where the M/QLOS handbook does not explicitly provide LOS E thresholds, the LOS E service volumes were derived by adding the difference between the LOS C and LOS D service volumes to the LOS D values.

- 13. It should be noted that SW 162nd Avenue does not connect directly from SW 144th Street to SW 136th Street. Please revise the map series to reflect this disconnection. Please include the railroad corridor on the map series.**

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.

Additionally, the project understands the importance of providing the missing connection along SW 162nd Avenue to establish a direct connection from SW 144th Street and SW 136th Street. The project also recognizes the significance of providing direct connections from the project site to SW 136th Street.

The Applicant recognizes the need to facilitate rails crossing at least three locations within or adjacent to the project property. Applicant has been actively engaging with the CSX Railroad regarding this issue and will continue communications with CSX in order to obtain CSX approval for the identified rail crossings. If approval is not obtained prior to the first plat approval within the project, Applicant will modify the project plan accordingly and seek a modification of the development order.

- 14. Project trip assignments in the volume development sheet are not consistent with the trip distribution map (J-E1) and/or link analysis table (21.A.2). Two examples are noted below:**
- Eastbound approach at SW 157th Avenue/SW 152nd Street intersection should be 34% instead of 30%.**
 - Eastbound approach at SW 127th Avenue/SW 120th Street intersection should be 3% instead of 2%.**

Please revise.

Response: The trip assignments were based on the SERPM distribution. The distribution along the roadway links on the map account for the traffic decay along the roadway network as the distance increases from the development. Discrepancies are due to differences between the approach and departure percentages, which result from traffic decay along the roadway network.

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

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

Response: Turning Movement Counts (TMCs) were collected at the requested intersections. The intersection analysis has been updated to include these intersections.

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

Response: An exhibit has been created showing the locations, spacing, and turn lane restrictions for all proposed access driveways. Exhibit J-G1 is located within Question 21-G of the report.

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. The project recognizes the significance of providing direct connections from the project site to SW 136th Street.

The Applicant recognizes the need to facilitate rails crossing at least three locations within or adjacent to the project property. Applicant has been actively engaging with the CSX Railroad regarding this issue and will continue communications with CSX in order to obtain CSX approval for the identified rail crossings. If approval is not obtained prior to the first plat approval within the project, Applicant will modify the project plan accordingly and seek a modification of the development order.

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

- **At SW 137th Avenue/SW 120th Street intersection, the exclusive westbound right-turn lane**
- **At SW 127th Avenue/SW 120th Street intersection, the additional eastbound through & exclusive right-turn lane, northbound through & left-turn lane, and westbound through**

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

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

Response: The Future without Project scenario has been re-optimized. Several of the previously identified lane improvements are no longer required to achieve the target LOS thresholds and have been removed from the analysis. The revised Synchro files reflect these updates.

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

Response: The Synchro analysis has been revised. Signal timing was modified to provide mitigation.

Question 23. Hurricane Preparedness

19. Shelter Space

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

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

Please provide the requested information.

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 24. Housing

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

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

Response: The terms “workforce housing” and “attainable housing” are used interchangeably in the response. The applicant’s commitment to rent or sell 12.5 percent of units as workforce housing will be consistent with the County’s Housing Element of the ADA where Workforce housing “is defined as housing that is affordable to persons or families whose total household income is at or below 140% of the AMI.” 12.5 percent of units leased and/or sold in the project will be affordable to families at or below 140% of AMI.

21. Please reconcile the housing supply provided, which indicates there is a surplus of affordable housing units within the study area. In comparison, the Shimberg Center for Housing Studies’ 2025 Annual Report indicates that Miami-Dade County

continues to have a deficit of affordable housing units. Funded by the Florida Legislature, the Shimberg Center for Housing Studies is recognized as providing the best available data and information about Florida's housing needs and supply.

Response: As set forth in the City Park Application for Development (Agreement to Delete), the Housing Demand, Supply and Need Methodology for Assessing the Affordable Housing Impact of Developments of Regional Impact (the "Methodology") utilizes the East Central Florida Regional Planning Council (ECFRPC) as amended in June 1999. The methodology consists of four elements: Estimating the Demand for Affordable Housing; Estimating the Supply of Affordable Housing; Estimating the Need for Affordable Housing; and Mitigating the Deficit of Affordable Housing (if any).

Specific to comments provided in the City Park DRI Statement of Information Needed (SIN2), SFRPC is seeking a reconciliation between "a surplus of affordable housing units within the study area" based upon the agreed upon methodology in comparison to the Shimberg Center for Housing Studies' 2025 Annual Report (Shimberg study) which indicates that Miami-Dade County continues to have a deficit of affordable housing units.

Our analysis utilizing the ECFRPC methodology in no way challenges or conflicts with the Shimberg Center's findings because these two studies cannot be reconciled. The Shimberg study measures supply and demand at the county level only and does not provide an assessment for the City Park study area. Additionally, the datasets and methodology which Shimberg utilizes for analysis and the analysis required by the ECFRPC differ materially. The 2025 Shimberg report relies on U.S. Census 2023 American Community Survey data to determine demand and supply of affordable housing without distinguishing between for-sale or for-rent demand and supply. As required by the agreed upon methodology, the City Park analysis uses trailing 12-month home sales in the study area from the Miami-Dade County Property Appraiser (December 1, 2024 through November 30, 2025), excluding non-qualified or non-arm's-length sales. For rentals, the City Park analysis relies on CoStar data as of January 2026, covering an estimated 95 percent or more of rental inventory in the study area, including vacant units and effective rents by unit type. The source data for both homeownership (MDCPA) and rental (Costar) were accepted as part of the Agreement to Delete, and the supporting data for each included as an Appendix in the Application. Likewise, during the prior round of agency comments, certain modifications to the methodology were requested (i.e. inclusion of units under construction) that had the effect of actually closing the gap between demand and supply.

Nothing included as part of the City Park analysis should be construed to dispute the Shimberg report's conclusion that Miami-Dade County has a substantial countywide need for affordable and workforce housing. But housing conditions vary across the county and new construction of a significant number rent restricted units in the 20-minute driveshed dictated by the methodology is beginning to ease the supply constraint faced by low- and moderate- income families in the area around City Park.

The methodology utilized by City Park area associated with homeowner sales and rental data shows a considerable amount of affordable housing exists. The analysis identified 685 homeownership sales affordable to very low-, low-, and moderate-income households, as well as 1,139 existing rental units affordable to those income groups. In response to SIN1, an additional 1,065 affordable rental units in future pipeline projects are under construction within the 20-minute drive-time area were also identified. It should be noted that the City Park evaluation does indicate that there is a 106-unit deficit for very low- income households that will be generated as a result of the commercial development which is part of City Park. However, under the ECFRPC methodology, a deficit is significant only if it exceeds 5 percent of the 3,000-unit DRI residential threshold in Miami-Dade County, or 150 units. Because the identified deficit is 106 units, it does not exceed that threshold.

Question 27. Education

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

Response: 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 dated May 26, 2026 (attached after page 16 of this document), 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.

Question 40. Agriculture

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

Response: The detailed evaluation of the development's projected water demand, water supply impacts, and proposed means of service is provided in the response to DRI Question 17 – Water Supply. Per that response, the proposed development will be served through Miami-Dade County's centralized public water system and will be subject to applicable County level-of-service standards, concurrency requirements, water conservation measures, utility capacity review, infrastructure improvements, and phasing requirements. The Applicant will continue to coordinate with the Miami-Dade County Water and Sewer Department to confirm available capacity and any improvements necessary to ensure that potable water service is available concurrent with the impacts of development.

The Applicant does not agree that the project will divert water supply from other development within the UDB or constrict water supply available to the surrounding agricultural area. The application does not propose to transfer or reallocate water rights from adjacent agricultural properties or from other properties within the UDB. Rather, the project's water demand will be reviewed through the County's adopted water supply, utility capacity, and infrastructure planning processes.

From: [Graham Penn](#)
To: [Jeffrey Bercow](#); [Carmen Orozco <Carmen.Orozco@lennar.com>](#); [Melissa Bolivar <melissa.bolivar@lennar.com>](#); [Nicholas J. Rodriguez-Caballero](#); [Rob Curtis](#); [Lilibeth Hauck <lilibeth.hauck@lennar.com>](#)
Subject: FW: Preliminary School Concurrency Analysis for Parkland West LLC, ET AL (Z2025000221) (PH3026052600245)
Date: Tuesday, June 2, 2026 1:20:27 PM
Attachments: [image524398.png](#)
[Parkland West LLC, ET AL \(Z2025000221\) \(PH3026052600245\).pdf](#)

FYI, we remain consistent with school concurrency!



Graham Penn

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Biography

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From: HERRERA, ANA I <anah732@dadeschools.net>

Date: Tuesday, June 2, 2026 at 12:33

To: Graham Penn <gpenn@brzoninglaw.com>

Cc: Simon, Nathaly <NSimon1@dadeschools.net>; Garcia, Jeannette C.

<jcgarcia1@dadeschools.net>; RODRIGUEZ, IVAN M <IRodrigu@dadeschools.net>;

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<noel.stillings@miamidade.gov>; Connally, Ronald (RER) <ronald.connally@miamidade.gov>;

Campos, Isaac (RER) <isaac.campos@miamidade.gov>

Subject: Preliminary School Concurrency Analysis for Parkland West LLC, ET AL (Z2025000221) (PH3026052600245)

Dear Applicant,

Pursuant to State Statutes and the Interlocal Agreement for Public School Facility Planning, the above-referenced application was reviewed for compliance with Public School Concurrency. Accordingly, enclosed please find the School District's Preliminary Concurrency Analysis (School Planning Level Review).

As noted in the School Planning Level Review, the proposed development would yield a maximum residential density of 7,800 units, which generate 1,890 students (892 at the elementary, 457 at the

middle, and 541 at the senior high school level). At this time, all school levels have sufficient capacity available to serve the application. However, a final determination of Public School Concurrency and capacity reservation will only be made at the time of approval of final plat, site plan or functional equivalent, notwithstanding any additional information that may surface after further departmental research. As such, this analysis does not constitute a Public School Concurrency Approval. Should you have any questions, please feel free to contact our office at 305-995-7285.

Regards,



Ana Herrera

District Coordinator

Growth Management

Office of Governmental Affairs and Land Use

Facilities Design and Construction

Miami-Dade County Public Schools

1450 N.E. Second Avenue

Miami, Florida 33132

(305) 995-4603



Concurrency Management System (CMS)

Miami-Dade County Public Schools

Miami-Dade County Public Schools

Concurrency Management System Preliminary Concurrency Analysis

MDCPS Application Number:
Date Application Received:
Type of Application:

PH3026052600245
5/26/2026 10:41:12 AM
Public Hearing

Local Government (LG):
LG Application Number:
Sub Type:

Miami-Dade
Z2025000221
Zoning

Applicant's Name:
Address/Location:
Master Folio Number:

Parkland West LLC, ET AL
Bet SW 136-152 Sts & SW 162-Krome Aves
3059200000040

Additional Folio Number(s):

3059200000031, 3059190000012, 3059200000080, 3059200000050, 3059190000011, 3059200000070, 3059190000020, 3059200000030, 3059190000010, 3059200000040,

PROPOSED # OF UNITS

7800

SINGLE-FAMILY DETACHED UNITS:

1029

SINGLE-FAMILY ATTACHED UNITS:

4532

MULTIFAMILY UNITS:

2239

CONCURRENCY SERVICE AREA SCHOOLS						
CSA Id	Facility Name	Net Available Capacity	Seats Required	Seats Taken	LOS Met	Source Type
125	NORMA BUTLER BOSSARD ELEMENTARY	45	892	45	NO	Current CSA
125	NORMA BUTLER BOSSARD ELEMENTARY	0	847	0	NO	Current CSA Five Year Plan
6771	JORGE MAS CANOSA MIDDLE	802	457	457	YES	Current CSA
7731	MIAMI SOUTHRIDGE SENIOR HIGH	23	541	23	NO	Current CSA
7731	MIAMI SOUTHRIDGE SENIOR HIGH	17	518	17	NO	Current CSA Five Year Plan
ADJACENT SERVICE AREA SCHOOLS						
3261	MIAMI HEIGHTS ELEMENTARY	402	847	402	NO	Adjacent CSA
2151	JACK DAVID GORDON COMMUNITY ELEMENTARY	292	445	292	NO	Adjacent CSA
4511	DR. GILBERT L. PORTER ELEMENTARY	235	153	153	YES	Adjacent CSA
7531	MIAMI SUNSET SENIOR HIGH	906	501	501	YES	Adjacent CSA

*An Impact reduction of **35.54%** included for charter and magnet schools (Schools of Choice).

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

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