

<div><h1>Application No. 7</h1><div>Commission District 11 Community Council 11</div></div>
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APPLICATION SUMMARY

Applicant/Representative:	Wonderly Holdings, Inc.; HL Mills Family LLC; Luis A. Posada; Section 31 Tract 50 Corp.; Ima Yaffer Trs; G.C.A.M. Investment Corp.; Limonar Development Inc.; Section 31 Tract 19 Corp.; Largo Enterprises, LLC/Mario Garcia-Serra Esq., Francisco Pines, Esq.
Location:	Between SW 64 Street and SW 88 Street (Kendall Drive), and between SW 177 Avenue (Krome Avenue) and SW 167 Avenue
Total Acreage:	±859 Gross Acres (±831.4 Net Acres)
Current Land Use Plan Map Designations:	“Institutions, Utilities, and Communications” and “Agriculture”
Requested Land Use Plan Map Designation and Other Changes:	<ol style="list-style-type: none">1. Expand the 2020 Urban Development Boundary (UDB) to include the site2. Amend the Land Use Element to create the “Green City Miami” land use category3. Redesignate ±819 gross acres (±791 net acres) of the application site on the Land Use Plan map from “Agriculture” to “Green City Miami” (excludes wellfield)4. Amend the Adopted 2020 and 2030 Land Use Plan map to designate new Urban Centers (Metropolitan and Community Urban Centers)5. Amend Policy LU-8F of the CDMP Land Use Element6. Create new Policy LU-8J in the CDMP Land Use Element7. Amend Figure 1 (Planned Year 2025 Roadway Network), Figure 3 (Roadway Functional Classification Year 2025), and Figure 6 (Planned Non-Motorized Network Map) in the Traffic Circulation Subelement of the CDMP to change the designation of certain roadway segments
Amendment Type:	Standard
Existing Zoning/Site Condition:	GU (Interim District)/County’s West Wellfield and agricultural uses

RECOMMENDATIONS

Staff:	DENY AND DO NOT TRANSMIT (September 2015)
West Kendall Community Council (11):	DENY AND DO NOT TRANSMIT (September 29, 2015)
Planning Advisory Board (PAB) Acting as the Local Planning Agency:	To Be Determined (October 19, 2015)
Board of County Commissioners:	To Be Determined (November 18, 2015)
Final Action of Board of County Commissioners:	To Be Determined (February/March 2016)

Staff recommends to **DENY AND DO NOT TRANSMIT** the proposed standard amendment to the Comprehensive Development Master Plan (CDMP) text, Adopted 2020-2030 Land Use Plan (LUP) map, and Traffic Circulation Subelement map series. The proposed amendment seeks to expand the 2020 Urban Development Boundary (UDB) to include the ±859 gross acre subject property; create a new land use category "Green City Miami"; redesignate the ±819-acre "Agriculture" designated portion of the property to "Green City Miami"; amend the Adopted 2020-2030 Land Use Plan to designate new urban centers within the site; amend Land Use Element Policy LU-8F; create a new Land Use Element Policy LU-8J; and amend Figures 1, 3, and 6 of the Traffic Circulation Subelement to change the roadway classification of certain roadway segments. Staff's recommendation on the application is based on the following reasons.

Principal Reasons for Recommendation:

1. The application proposes changes to the CDMP and development that are contrary to and inconsistent with the provisions of the CDMP for determining when to add lands to the 2015 Urban Development Boundary (UDB). The amendment proposes the development of 11,401 residential units and over 3.3 million square feet of non-residential development on land currently located outside the UDB (including 1.3 million sq. ft. of retail and 350,000 sq. ft. of industrial discussed under Land Use Plan Map Designation discussion on page 7-28). The CDMP Land Use Element Policy LU-8G requires that before considering expansion of the UDB it must first be demonstrated that there is a need to add land to the UDB, in accordance with Policy LU-8F. Land Use Element Policy LU-8F requires the UDB to contain adequate developable land (land supply) having the capacity to accommodate the County's projected population and economic growth. Policy LU-8F requires the UDB to contain adequate developable land with the capacity to sustain residential growth for a period of 15 years after adoption of the most recent CDMP Evaluation and Appraisal Report (most recently adopted in March 2011). Additionally, the policy requires the adequacy of non-residential land supply within the UDB to be determined by countywide supply as well as by subareas of the County appropriate to the type of use. The adequacy of commercial land is determined by Minor Statistical Areas (MSAs) and combinations thereof, and the adequacy of industrial land is determined by planning analysis tiers, half-tiers and combinations thereof.

The Supply and Demand Analysis prepared by staff, contained herein on page 7-30, demonstrates that there is adequate residential land within the UDB to sustain population growth to the year 2030, a 19-year supply from the adoption of the most recent CDMP Evaluation and Appraisal Report and 4 years more than the required 15-years of residential land supply. The Supply and Demand Analysis also demonstrates that there is adequate commercial land within the UDB to sustain economic growth beyond the year 2030, both countywide and in the commercial study area in which the application site is located (combined MSAs 6.1 and 6.2). The countywide supply of industrial land within the planning analysis tier where the application is located has the capacity to sustain industrial growth to the year 2021, but, there is adequate countywide supply industrial land to sustain industrial growth beyond the year 2030. Therefore, pursuant to Policy LU-8G, there is no demonstrated need to expand the UDB and the development proposed in the application is premature and unwarranted at this time.

2. In light of the fact the Applicant is unable to demonstrate a need for the proposed ±860-acre expansion of the UDB as required by Policies LU-8F and LU-8G, the Applicant has instead proposed changes to Policy LU-8F in support of the application that would significantly diminish the effectiveness of the CDMP in controlling growth. The Applicant's proposed changes to Policy LU-8F would require the UDB to contain a 20-year supply of developable residential land beyond the most recently adopted CDMP Evaluation and Appraisal Report, instead of the 15-year supply currently required. Additionally, the proposed change provides that "[d]uring the intervening period prior to the next Evaluation and Appraisal Report adoption, CDMP amendments may be adopted to maintain a maximum 20 year Countywide supply from the adoption date of such amendments" (see Proposed Amendments to Land Use Element Policy LU-8F on page 7-22). The Applicant's proposed change to Policy LU-8F would shift the County's CDMP policies to facilitate biennial UDB expansions whenever the residential land supply inside the UDB is less than the proposed 20-year supply, including such instances when there is an 18-year or 19-year residential land supply. This is of particular concern given the application itself consisting of 11,401 proposed dwelling units would only add just over one-year worth of supply to the countywide residential Land supply, and these units are proposed in the application to be built over a period of 20 years.

Furthermore, the proposed change to Policy LU-8F would discourage infill and redevelopment contrary to CDMP Objective LU-1 and Policies LU-1C and Policy LU-10A. The Objective and Policies require the County to give priority to infill development on vacant sites in currently urbanized areas, and redevelopment of substandard or underdeveloped environmentally suitable urban areas contiguous to existing urban development where urban services and facilities have the capacities to accommodate additional demand. The proposed Policy revision requiring a 20-year residential land supply within the UDB after adoption of the most recent Evaluation and Appraisal Report (EAR) and facilitating the maintenance of a 20-year residential land supply between successive EARs would act as a disincentive to infill and to redevelopment in particular.

3. The application cites three reasons for the proposed change to Policy LU-8F that are unsubstantiated and inaccurately suggests that there is an inherent problem with the County's long standing policies for considering UDB expansions. The first reason is a perceived inadequacy of land within the UDB to accommodate population growth referred to in the application as under the Reason for Amendment 1A in the application as "Six Year UDB Capacity is Not Adequate". However, as demonstrated in Principal Reason No. 1, there is currently adequate commercial, industrial and residential land within the UDB and

expansion of the UDB is not warranted pursuant to Land Use Element Policies LU-8G and LU-8F.

Second, is a perceived “Projection Error” in the County’s population projection, in Reason for Amendment 1B in the application. Furthermore, as discussed in Other Planning Considerations section of this report, page 7-62, the applicant has not provided adequate data and analysis to demonstrate that there is a “Projection Error” in the County’s population projections that would warrant any change to the County’s projections.

Third, is “Housing Affordability” whereby the applicant contends that the current UDB expansion policy impacts the cost of housing in the County in Reason for Amendment 1C in the application. In its discussion on the Housing Affordability, it is stated in the application that:

“While it is admittedly difficult to prove the relative impact of the UDB policy on housing prices, it is reasonable to conclude that the UDB policy is a contributing factor...”

In support of this position, the Community Planning Act amended Chapter 163, Part II, of Florida Statutes in 2011, after the County’s adoption of the 2010 EAR so as to require that local governments not unduly restrict the operation of the real estate market in considering land use need...”

It must be highlighted that the above referenced Chapter 163, Part II, of the Florida Statutes and more specifically Section 163.3177(6)(a)4, requires future land use elements of comprehensive plans to accommodate the minimum land necessary for a 10-year planning period or a 10-year land supply. The County’s policy requiring the UDB to have a total 15-year residential land supply was first adopted into the CDMP since October 1996. Furthermore, by requiring the UDB to contain a 15-year supply of developable residential land after adoption of each CDMP Evaluation and Appraisal Report (EAR), the provision of Policy LU-8F exceeds the minimum 10-year land supply requirements of Chapter 163. Therefore, and as demonstrated in Principal Reason No. 1 above, there is adequate land within the UDB at this time and there is no need to expand the UDB as requested in the application.

Additionally, pursuant to Section 2.116 of the Miami-Dade County Code, an evaluation and appraisal of the CDMP is to be conducted every seven (7) years to reflect changes in state policy on planning and growth management with said evaluation to be reflected in an Evaluation and Appraisal Report, next due in 2017/2018. During the next scheduled Evaluation and Appraisal of the CDMP both the capacity of land within the UDB will be evaluated and the County’s population projection will be updated, and the County’s land supply within the UDB is constantly updated.

4. The application cites “Housing Affordability” as a reason for the application, outlined in Principal Reason No. 3 above, but the application does not provide adequate data and analyses to demonstrate how “Housing Affordability” is adequately and appropriately addressed through the requested UDB expansion and CDMP policy changes. To address “Housing Affordability” the Applicant proposes that a new Policy LU-8J be added to the CDMP Land Use Element that encourage Transit Oriented Villages (TOVs) that would be larger scale master planned mixed use developments on properties ranging between 500 and 1,000 acres. The application states that “[t]he proposed new policy is intended to

encourage Transit Oriented Villages (TOV) as a means to achieve affordable and workforce housing, reduce commuting costs for households (i.e., make more household income available for housing) and to achieve other important public policy objectives of the Miami Dade CDMP”.

The proposed policy includes a three-option strategy to support affordable and workforce housing. The first option requires that a minimum 10% (1,140 dwelling units) within the proposed development must be affordable and workforce housing units, of which shall be dedicated to affordable housing. In the case of the proposed Green City Miami development a minimum 1,140 dwelling units (10% of the total 11,401 units) would be affordable and workforce housing units, of which 2% or 228 dwelling units be dedicated to affordable housing. The second option is the provision of transit stipends by “each establishment” within the proposed development to its share of a total 10% of eligible full time workers within the development who qualify for affordable housing, or an employer based van pool program. The third option is the proposal of a comparable alternative strategy to the first two option discussed above. Notwithstanding these provisions in the proposed Policy LU-8J, the application does not include adequate data and analyses to demonstrate that the application addresses the issue of “Housing Affordability” in any way that warrants a new policy approach in considering expansions to the UDB.

5. The application proposes development that is inconsistent with Land Use Element Policy LU-8H (see policy LU-8H on page 7-85). The policy requires applications seeking expansion of the UDB to first demonstrate a need for the application in accordance with Policies LU-8F and LU-8G. Policy LU-8H further sets forth criteria (“a” through “h”) to be met by the proposed development after a need is demonstrated. As discussed in Reason No. 1 above, the application does not demonstrate a need for expanding the UDB, and furthermore, does not demonstrate compliance with criteria “a” and “f” of Policy LU-8H. Criteria “a” requires that the non-residential needs of residents within the proposed development are provided for, including employment. Based on the program of development proposed in the application, the Applicant estimates that 7,600 jobs would be created within the proposed Green City Miami development. However, the application proposes development of 11,401 residential units with a projected population of 29,979 persons of which an estimated 14,431 persons would be added to the Kendall area labor force (see Other Planning Considerations on page 7-62). Assuming all jobs created were filled by the residents of the proposed development, there would be a shortfall of 6,831 jobs. Criteria “f” of the policy requires the proposed development be demonstrated to not discourage or inhibit infill or redevelopment efforts within the UDB. As discussed Principal Reason No. 2 above, the change to Policy LU-8F requested by the Applicant in support of the proposed development would discourage infill and redevelopment. Therefore, the application is inconsistent with Policy LU-8H and has not demonstrated compliance with criteria “a” and “f” of the policy.
6. The Applicant’s proposed new Policy LU-8J would introduce an internal inconsistency into the CDMP by establishing a new process in the CDMP text for approval of development without adequately specifying the details of this new land development process (see the Applicant’s proposed new Policy LU-8J, on page 7-22). Currently, land development authorized by the CDMP and amendments thereto, are implemented through the County’s zoning code and zoning approval process. The proposed new policy provides for the development of Transit Oriented Villages (TOVs) on properties ranging between 500 and 1,000 acres that are to be master planned through a “Planned Unit Development process”. The proposed policy further provides that “TOVs shall be approved as Planned Unit

Developments, and shall be further implemented by adoption of a site specific, form-based code which shall be adopted in conjunction with the zoning ordinance”. However, the application and the Applicant’s proposed new Policy LU-8J lacks adequate explanation of the guiding principles of what constitutes a TOV and what sets TOV’s apart from the transit-oriented developments currently promoted in the CDMP that would warrant expansion of the UDB as proposed in the application.

7. The proposed Green City Miami land use category, if approved, would inappropriately introduce several inconsistencies into the CDMP. The introductory paragraph of the proposed category states “...the master plan document which is incorporated into the Future Land Use Element by reference...” seeks to incorporate a document into the CDMP, without first and appropriately having the document be brought before the Board of County Commissioners (Board) for consideration or acceptance. The referenced master plan is the “Green City Miami-Dade” report submitted by the applicant in support of the application (see Appendix F). While the report presents the Applicant’s vision for the Green City Miami development, it includes several dated maps and other information that should not be relied upon and are not consistent with the maps and other information currently in the CDMP.

For example, the Green City report (page 6) presents, associated discussion, an older version of CDMP ‘Figure 8: Population Estimates and Projection’. The report also, on pages 18, 19 & 20, identifies a State Road 836 (Dolphin Expressway) extension to SW 136 Street aligned along Krome Avenue and a connection of two CSX railroad corridors that currently serve rock mining interests as part of a possible regional transportation system that would serve the current Kendall population and the residents of the proposed Green City development. These possible projects are not consistent with the CDMP and should not be relied upon.

8. The Applicant’s requested ±859-acre expansion of the UDB for the proposed Transit Oriented Village, does not demonstrate appropriate coordination of land use and transportation planning as required by the CDMP. Land Use Element Objective LU-1 and Policy LU-1A and Mass Transit Subelement Objective MT-2 and Policy MT-2A require the location and configuration of urban growth to emphasize the intensification of development around centers of activity having high countywide multimodal accessibility including the provision of efficient transit service. The application does not demonstrate how transit service will be provided to the proposed development.

The application proposes to designate a Metropolitan Urban Center and a Community Urban Center for the site, provides for a regional bus facility on site and for transit stipends to 10% of all affordable housing eligible employees, and provides for TOV developments in the proposed Policy LU-8J. However, the application does not demonstrate how and when adequate and efficient transit service would be incorporated or phased to serve the proposed Green City Miami development. Evaluation of the traffic impacts that would be generated by the application indicates that the traffic from the proposed development would cause Kendall Drive between SW 176 Avenue and SW 152 Avenue to operate in violation of the adopted level of service standard for that roadway. Mass transit service in the vicinity of the application site operate primarily along Kendall Drive and planned enhancements to the existing West Kendall Transit Terminal and to transit service in the area through addition of the Kendall Bus Rapid Transit (BRT) route in year 2023 as identified by Miami-Dade Transit amounts to \$160 million in unfunded capital costs (see Transit Service analysis on page 7-59). The Applicant’s traffic study application does not identify nor address the traffic impact from the proposed development to Kendall Drive nor does it

address how adequate transit service would be extended to serve the proposed transit oriented development.

Furthermore, and as discussed in Principal Reason No. 7 above, the application seeks to inappropriately introduce into the CDMP Land Use Element the State Road 836 (Dolphin Expressway) extension to SW 136 Street and the connection of two CSX railroad corridors as possible transportation enhancements that would serve the proposed Green City Miami development and the west Kendall area. To be appropriately incorporated into the CDMP, such projects must be adopted into Transportation Element and Land Use Element and any necessary funding programmed in the Capital Improvements Element of the CDMP consistent with Policy LU-8D. This policy provides that the maintenance of internal consistency among all Elements of the CDMP shall be a prime consideration in evaluating all requests for amendment to any Element of the Plan. The Policy further requires that “among other considerations, the Land Use Plan map shall not be amended to provide for additional urban expansion unless traffic circulation, mass transit, water, sewer, solid waste, drainage and park and recreation facilities necessary to serve the area are included in the plan and the associated funding programs are demonstrated to be viable”. Also as discussed in the Roadways section herein on page 7-45, the Applicant’s Transportation Analysis analyzed a development program that deviates from the development proposed in the application, and staff has significant questions and concerns with the methodology used in the analysis. Staff will continue to work with the applicant to address these issues and to ensure the traffic impacts from the proposed development are appropriately analyzed and addressed.

9. The application proposes the unwarranted expansion of urban development into the West Wellfield Protection Area, abutting the West Wellfield, which could jeopardize both the County’s ability to expand potable water production to meet future needs and the long term viability of the wellfield. Policy LU-3B requires the protection of all significant natural resources and systems such as the West Wellfield from incompatible land uses. Similarly, CDMP Conservation, Aquifer Recharge and Drainage Element Objective CON-2 requires the protection of ground and surface water resources, and Policy CON-3A requires that uses which handle, generate, transport or dispose of hazardous wastes not be permitted within wellfield protection areas. The CDMP Water, Sewer and Solid Waste Element Policy WS-1D requires the County to protect the integrity of groundwater within the wellfield protection areas, and Objective WS-6 and Policies WS-6B and WS-6D require the County to take the steps necessary to assure that all viable potable water wellfields in the County remain available for use and for future expansion through measures that include, but not limited to, the expansion of the County’s wellfield protection measures. Additionally, Objective CON-4 requires the aquifer recharge and water storage capacity of the presently undeveloped areas in western and southern Miami-Dade County to be maintained or increased.

The proposed Green City Miami land use category includes several sub-areas identified as the Downtown Metropolitan Urban Center, Sports and Health Village Urban Center, Mid-town, East Village, and Park Village. The Sports and Health Village Urban Center is proposed to be located almost entirely within the 10 day travel-time contour of the West Wellfield’s Interim protection area, and proposes to allow sports facilities, university/college, alternative energy manufacturing facilities, health care facilities, among other uses. These proposed land uses typically generate and/or handle hazardous materials and hazardous wastes, which are prohibited in the wellfield protection area. Furthermore, pursuant to Section 24-43 of the Code, land uses within the 10 day and 30-

day travel-time contour of a wellfield protection area are subject to a sewage loading restrictions that would be exceeded by more than 200% in some cases by the proposed development (see Environmental Conditions analysis on page 7-33). The proposed Green City Miami land use category text provides that:

“...the use of particular sites or areas may be limited to something less than the maximum allowed by these regulations. Moreover, special limitations may be imposed where necessary to protect environmental resources or to ensure compatibility with adjacent uses...The Green City Miami Area shall be developed in a manner that is consistent with the adopted goals, objectives, and policies of this plan and with all applicable environmental regulations and other environmentally sensitive areas that are at or adjacent to the site”.

Based on the information provided in the application and supporting documents, it is not demonstrated how the proposed Green City Miami development could be consistent with the CDMP Objectives WS-6, CON-2 and CON-4, Policies LU-3B, CON-3A, WS-1D, WS-6B, and WS-6D, and/or comply with the sewage loading requirements discussed above without significantly reducing the intensity of the proposed development. The application does not include adequate data and analysis that demonstrate the proposed development could be consistent with the CDMP requirements for protection of the West Wellfield.

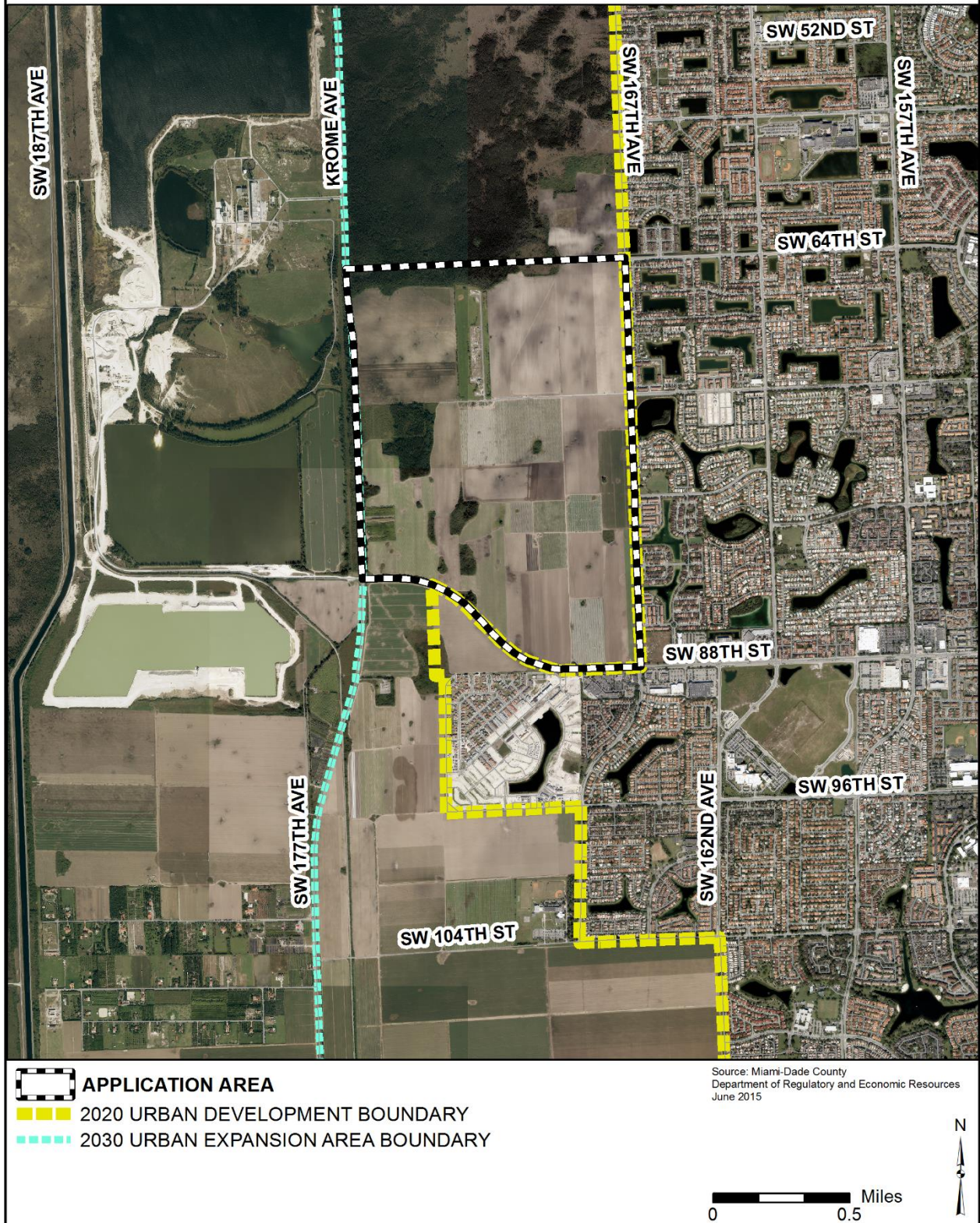
10. Chapter 163.3177(6)(a)9, Florida Statutes (F.S.), requires future land use elements and future land use element amendments to discourage urban sprawl and provides 8 indicators that a plan amendment discourages urban sprawl and 13 indicators that an amendment does not discourage urban sprawl (page 7-74 herein). The statute further provides that a plan amendment shall be determined to discourage urban sprawl if it incorporates a development pattern or urban form that achieves 4 or more indicators for the discouragement of urban sprawl.

Notwithstanding that the application proposes a mixed use and transit oriented development, the application has not demonstrated the appropriate coordination of land use and transportation planning to ensure adequate transportation facilities and transit service is provided to the proposed development (see Principal Reason No. 8 above). Additionally, the application proposes policy changes to the CDMP that would require a 20-year supply of residential land be maintained inside the UDB, discussed in Principal Reason No. 2 above. The application achieves 2 indicators for the discouragement of the proliferation of urban sprawl. Instead, staff's review of the application demonstrates it meets 5 indicators that the application does not discourage the proliferation of urban sprawl. These indicators include the promotion urban development in rural areas while not using undeveloped lands that are available and suitable for development; failure to protect and conserve natural resources; discouragement of urban infill and redevelopment; failure to maximize the use of existing public facilities and services; and allowing for land use patterns that disproportionately increase the cost in time and energy of providing and maintaining facilities and services. Pursuant to Chapter 163.3177(6)9, F.S., if the proposed amendment were approved it would not discourage the proliferation of urban sprawl, but instead, would encourage the proliferation of urban sprawl. Therefore, approval of the application would be in contravention of the statutory requirement to discourage urban sprawl.

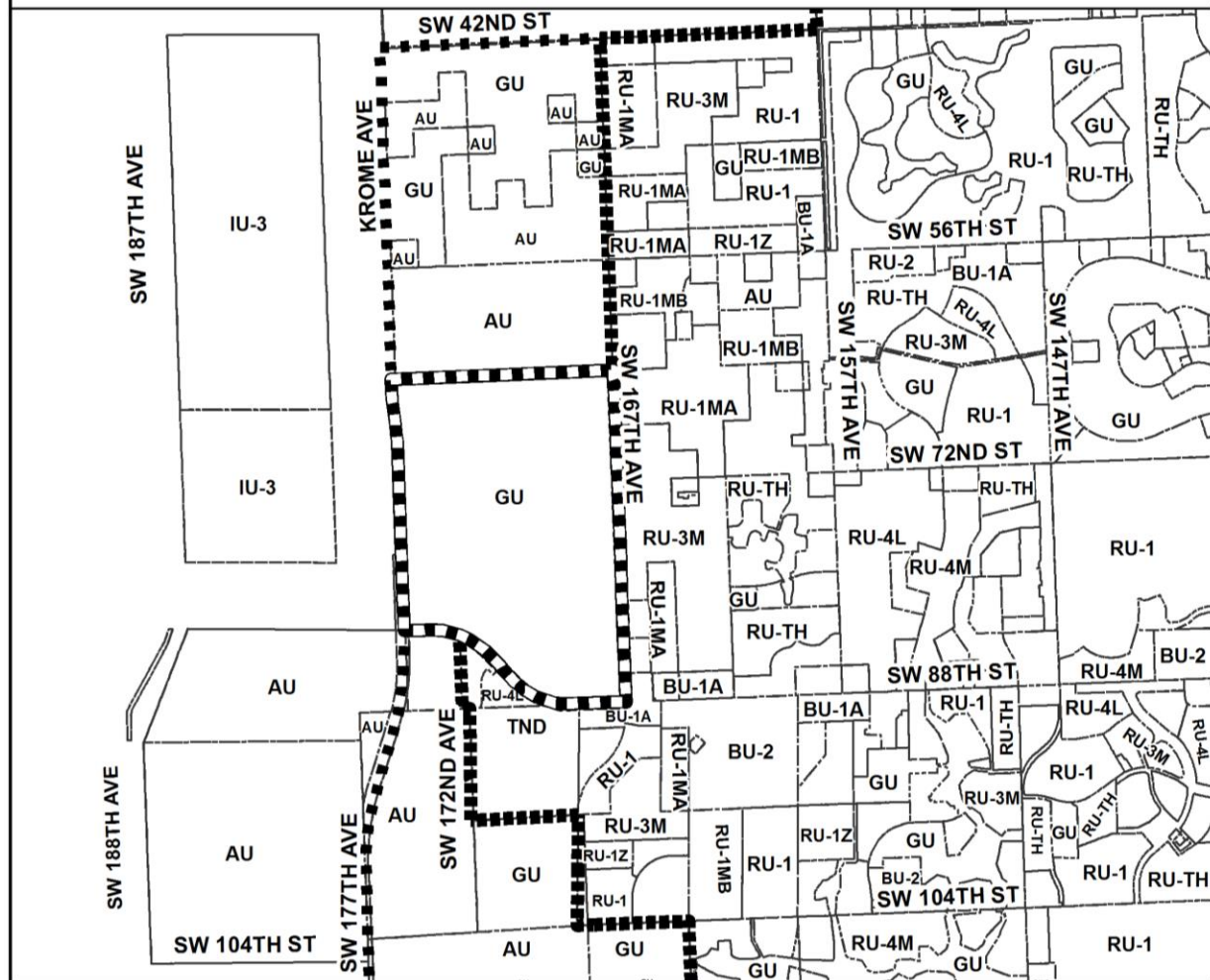
11. The application proposes to introduce urban development that is not compatible with the existing rock mining operations adjacent to west of the application site, across Krome

Avenue. CDMP Policy LU-4A states that when evaluating compatibility among proximate land uses, the County shall consider factors such as noise, runoff, traffic, vibration and buffering, as applicable. Policies LU-4B and CON-6A require uses such as rockmining that cause or generate significant noise, dust and vibration to be protected from damaging encroachment by new incompatible uses such as residential uses. The application does not address the impacts the proposed development would have on the mining operations to the west of the application site, nor does it address the impact the mining operations would have on the proposed development. The application proposes 11,401 residential units that would be incompatible with the adjacent rockmining operations and inconsistent with the above referenced Policies LU-4B and CON-6A.

APPLICATION NO. 7 AERIAL PHOTO



APPLICATION 7 ZONING MAP



APPLICATION AREA



2020 URBAN DEVELOPMENT BOUNDARY

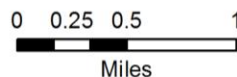


2030 URBAN EXPANSION AREA BOUNDARY

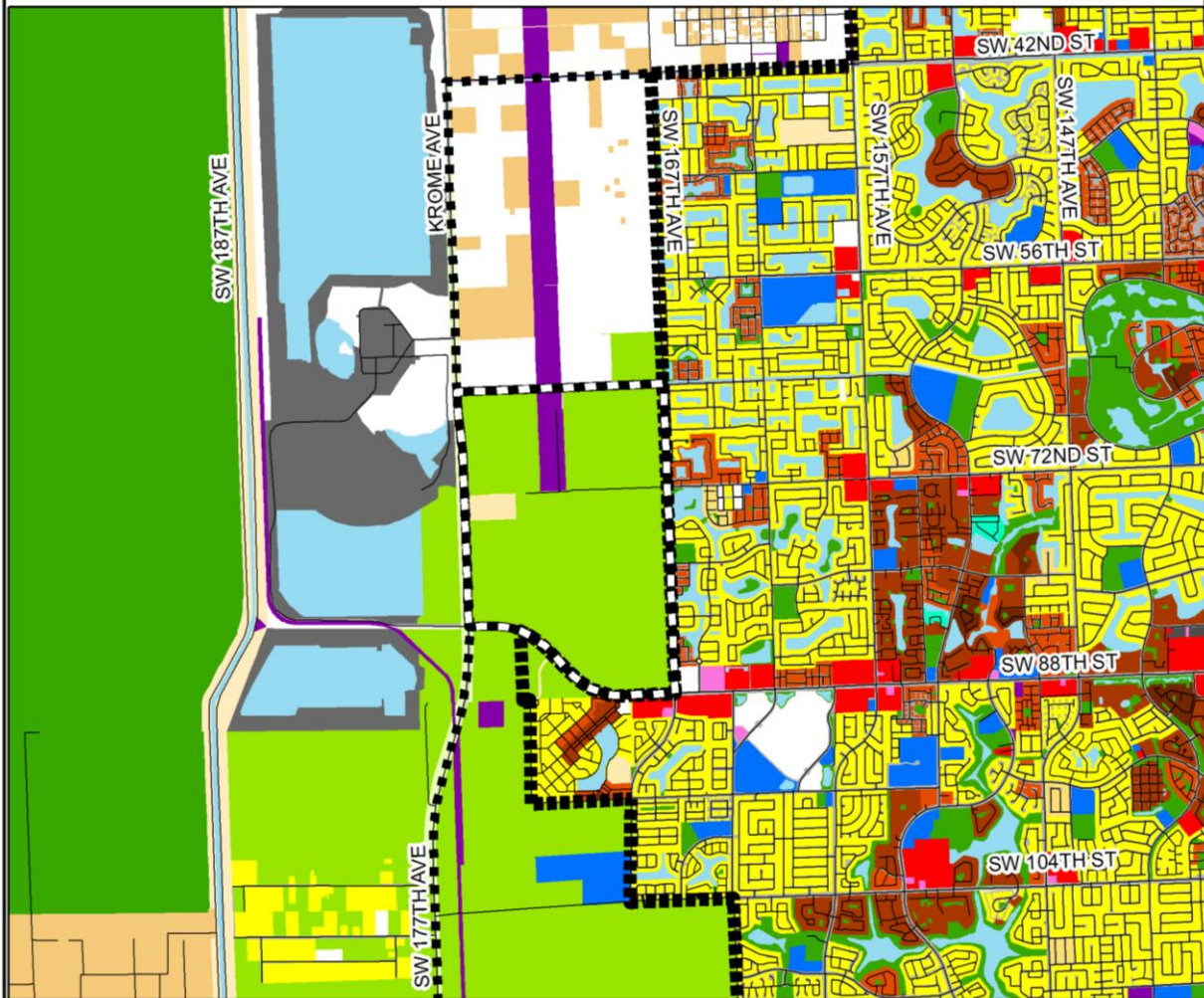
ZONING DISTRICTS

AU	AGRICULTURAL / RESIDENTIAL 5 ACRES GROSS	RU-4L	LIMITED APARTMENT HOUSE DISTRICT
BU-1A	BUSINESS DISTRICTS, LIMITED	RU-4M	MODIFIED APARTMENT HOUSE
BU-2	BUSINESS DISTRICTS, SPECIAL	RU-TH	TOWNHOUSE
GU	INTERIM DISTRICT	TND	TRADITIONAL NEIGHBORHOOD DEVELOPMENT
IU-3	INDUSTRIAL DISTRICTS, UNLIMITED MANUFACTURING		
RU-1	SINGLE-FAMILY RESIDENTIAL		
RU-1(M)(A)	MODIFIED SINGLE-FAMILY RESIDENTIAL		
RU-1(M)(B)	MODIFIED SINGLE-FAMILY RESIDENTIAL		
RU-2	TWO-FAMILY RESIDENTIAL DISTRICT		
RU-3M	MINIMUM APARTMENT HOUSE		

Source: Miami-Dade County
Department of Regulatory and Economic Resources
June 2015



APPLICATION NO. 7 EXISTING LAND USE



APPLICATION AREA



2020 URBAN DEVELOPMENT BOUNDARY



2030 URBAN EXPANSION AREA BOUNDARY

EXISTING LAND USE



SINGLE-FAMILY



TOWNHOUSES



LOW-DENSITY MULTI-FAMILY



RESIDENTIAL-GOVERNMENT OWNED HOUSING



COMMERCIAL, SHOPPING CENTERS



OFFICE



INSTITUTIONAL



INDUSTRIAL EXTRACTION



COMMUNICATIONS, UTILITIES, TERMINALS



STREETS, ROADS, EXPRESSWAYS, RAMPs



STREETS, EXPRESSWAY



AGRICULTURE



PARKS, PRESERVES, CONSERVATION AREAS



VACANT GOVERNMENT OWNED, UNPROTECTED



VACANT, PROTECTED, GOVERNMENT OWNED



VACANT PRIVATELY OWNED, UNPROTECTED



CANAL RIGHT-OF-WAY

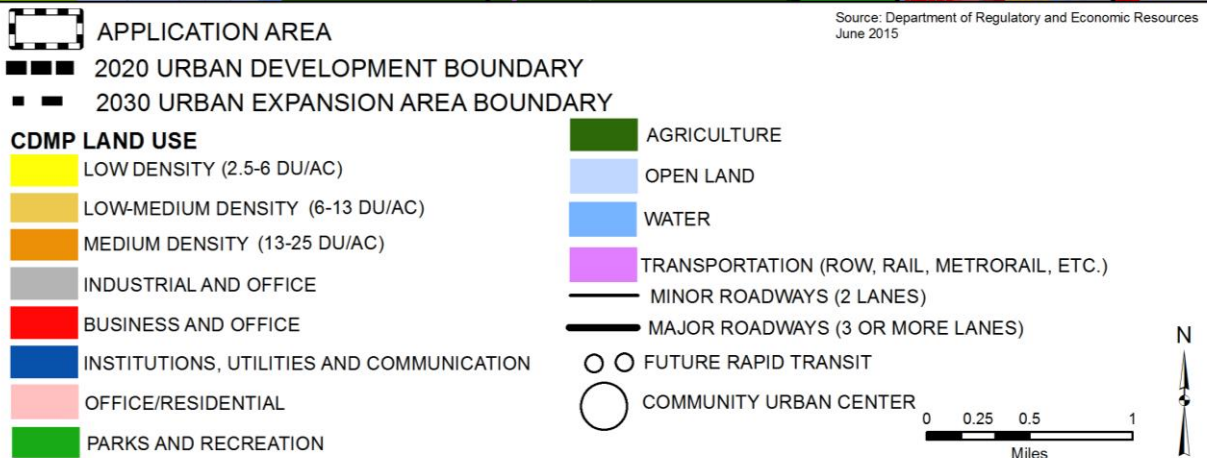
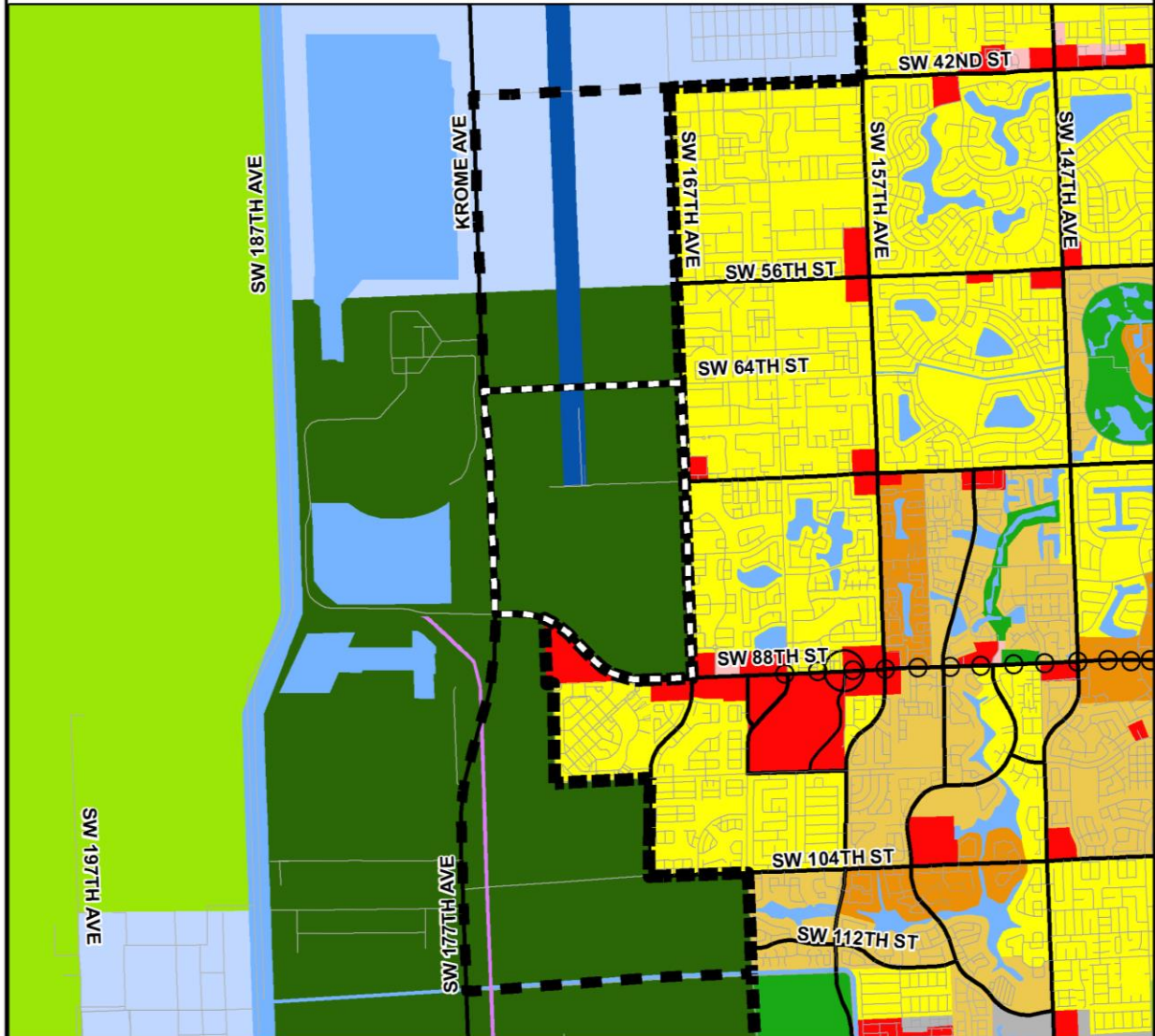


INLAND WATERS

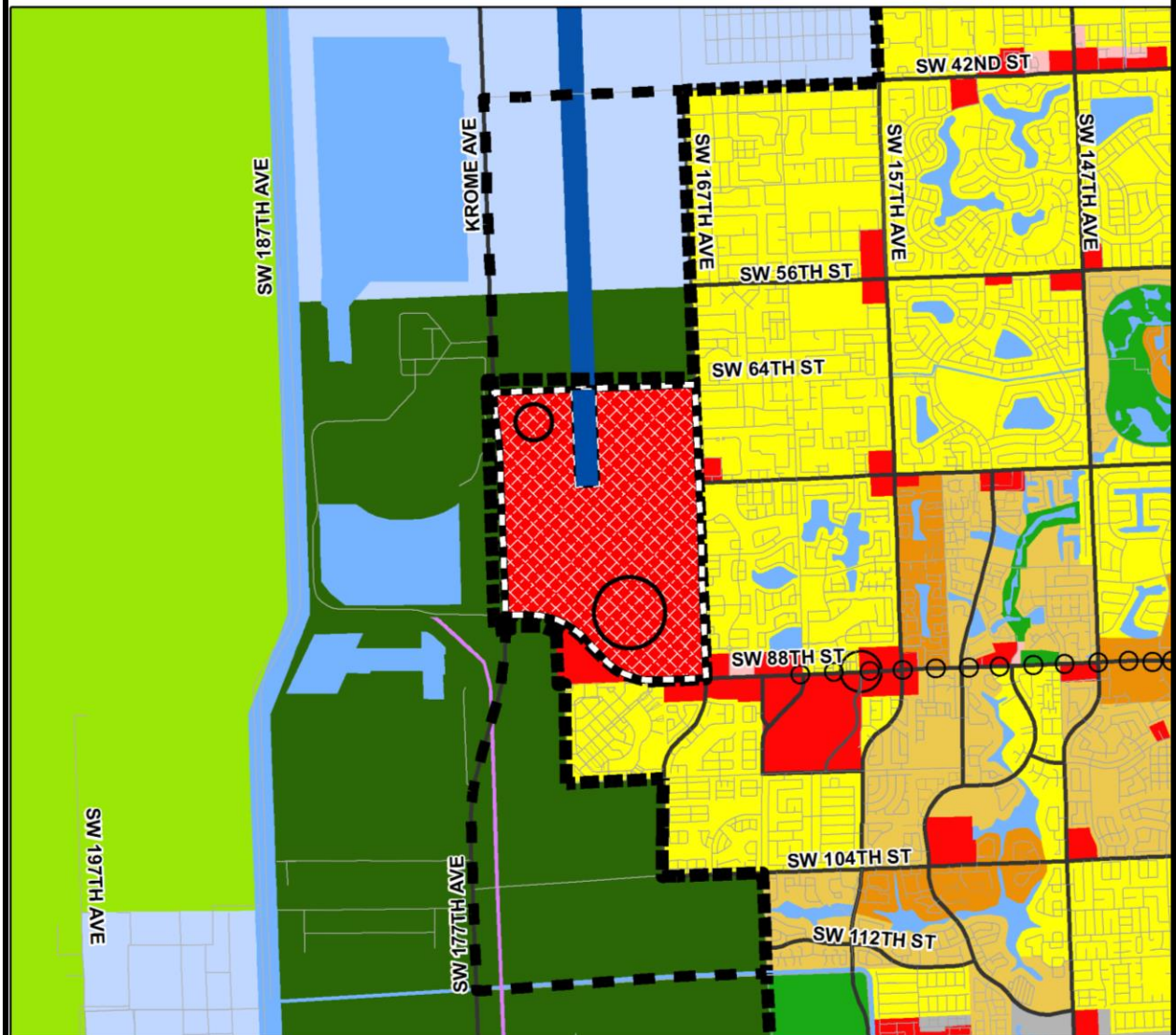
Source: Miami-Dade County
Department of Regulatory and Economic Resources
June 2015



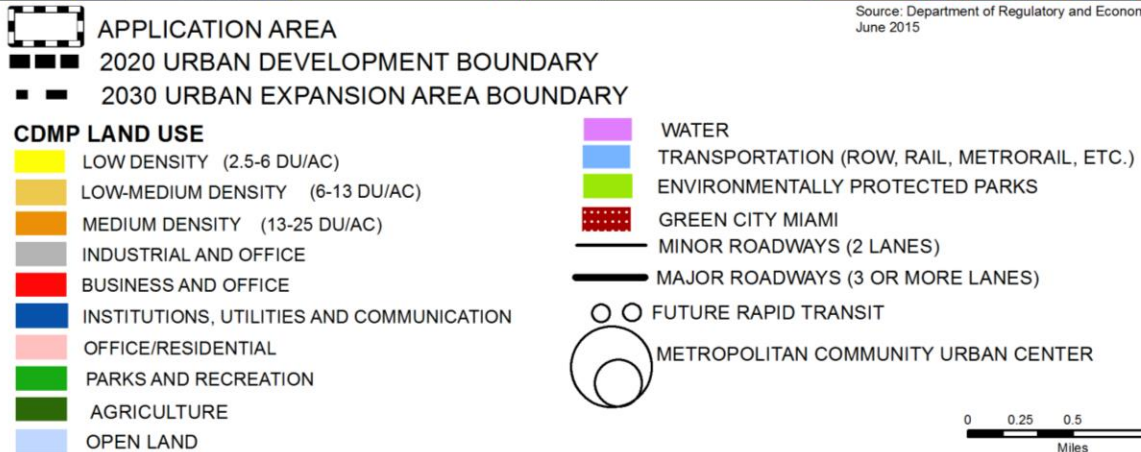
APPLICATION NO. 7 CDMP LAND USE



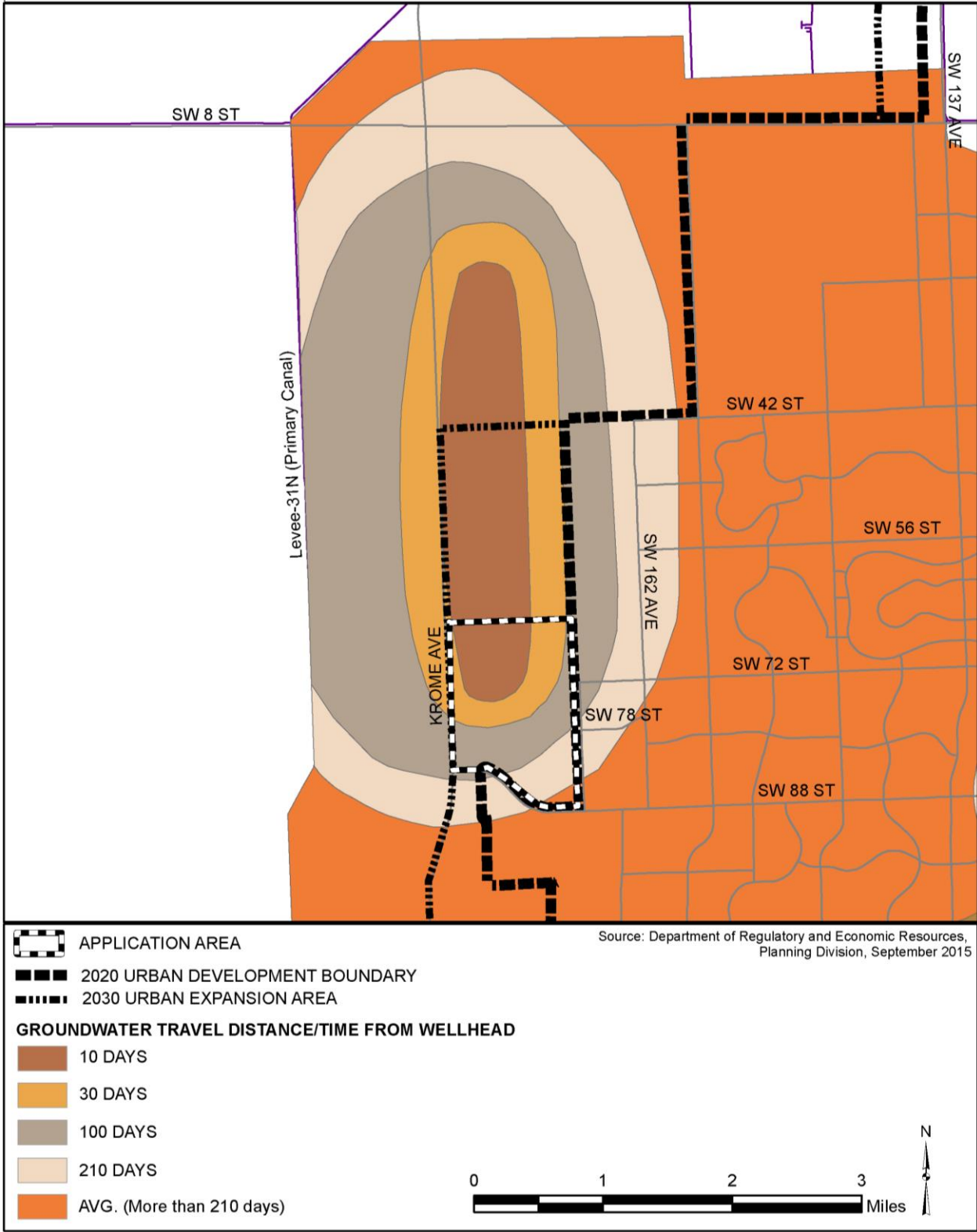
APPLICATION NO. 7 PROPOSED CDMP LAND USE



Source: Department of Regulatory and Economic Resources
June 2015



WEST WELLFIELD PROTECTION AREA



PROPOSED CDMP TEXT AMENDMENTS

The following presents the applicant's proposed text changes to the CDMP Land Use Element. Single underlined words present the Applicant's proposal as filed. Double underlined and double stricken through words represent changes requested by the Applicant by letter dated June 26, 2015, subsequent to the Department's June 22, 2015 publication of the application.

1. Proposed New Land Use Category Text and Map

Green City Miami Area

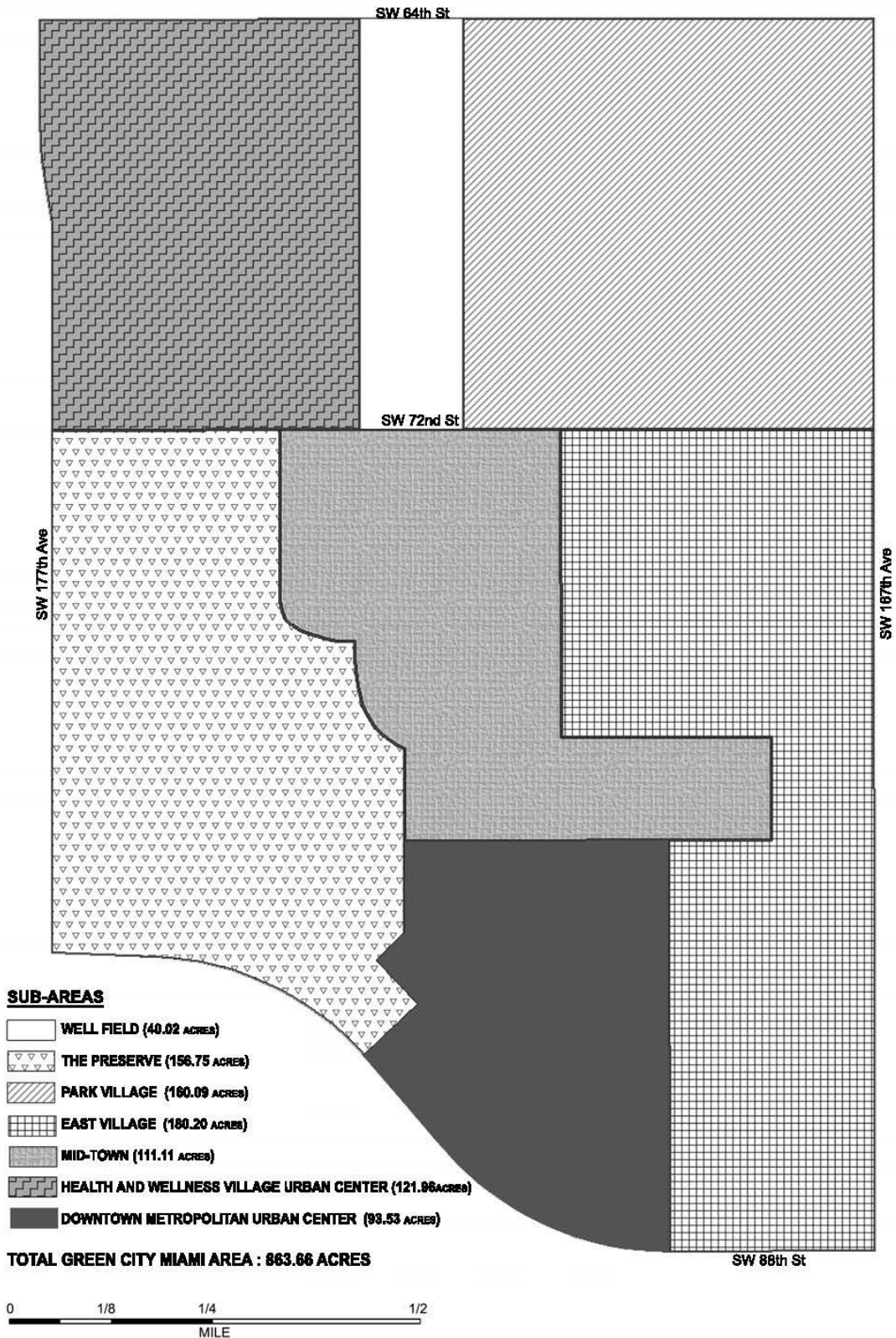
The intent of this category is to enable a self-sustainable and transit oriented development offering not just housing but needed services and workplaces targeting specific industries such as healthcare, medicine, hospitality, tourism, sports, entertainment and technology while also promoting a healthy lifestyle within an undeveloped area of Miami-Dade County that lies entirely within a longtime designed Urban Expansion Area and which can serve as a new Metropolitan Urban Center for the western end of Miami-Dade County. The emphasis of this category is on the creation of well-paying jobs in emerging and growing industries, the promotion of healthy lifestyles, and the lessening of dependence on car transportation. Development in this area shall comply with the specific standards of this subsection as well as the accompanying Green City Metropolitan Urban Center and Community Urban Center District zoning regulations and ~~the master plan document which is incorporated into the Future Land Use Element by reference to a restrictive covenant~~ restrictive covenants recorded in the public records of Miami-Dade County at the time of zoning approval establishing a development program and providing recreational uses with low impervious ratios as a buffer around the wellfield:

1. **Housing** - A variety of housing options shall be integrated from work force to market rate with easy access to schools, entertainment facilities, work centers, retail and services and entertainment / recreation options as well as artistic, religious, and cultural centers and attractions. The overall residential density of the Green City Miami Area shall be a minimum of 10 dwelling units per gross acre so as to prevent suburban sprawl type development. Ten percent (10%) of all proposed housing shall be either affordable or workforce housing with a minimum of 20% of that total dedicated to affordable housing (not exceeding 80% of the AMI) and a maximum of 80% dedicated to workforce housing (not exceeding 140% of AMI).
2. **Workplace** - Workplaces shall be integrated into a mix-use environment where you can live and work within proximity to each other, promoting a better quality of life with a minimum of 32% of the land area being dedicated and reserved for emerging industries which are underrepresented in Miami-Dade County such as information technology and research and development;

3. **Renewable Energy** - Energy use, water consumption, and waste shall be reduced by identifying programs and assisting with their implementation to subsidize the utilization of renewable energies and the recycling of rain-water;
4. **Agriculture** - The importance of the agricultural harvest in the west section of Miami-Dade County shall be acknowledged, preserved, and modernized by replacing existing inefficient row crop harvesting with more productive hydroponic farming;
5. **Environment** – The Green City Miami zoning regulations shall permit residential density bonuses pursuant to the County's established Severable Use Rights program which permits the transfer of development rights from the East Everglades Area of Critical Environmental Concern.
6. **Health** - A healthy lifestyle shall be promoted by combining a network of pedestrian and bicycle pathways integrated into a system of greens and parks. A main park shall offer areas to accommodate three type of sports: 1) *Leisure Sports* - for walking, running, playing and riding bicycles; 2) *Playing Sports* - with facilities for playing tennis, swimming, basketball, baseball and soccer; and, 3) *Focused Sports* - with professional facilities built to the required standards Maximum access to public transportation to encourage transit ridership, shall be provided along with a transit station with access to rapid transit or an express transit corridor. Pedestrian and bicycle circulation shall be promoted by providing a network of routes connecting all subareas to County wide regional bicycle paths.
7. **Transit** – A regional bus facility shall be provided that serves as a terminal for premium express bus service and which provides sufficient parking for projected ridership. Full time employees who work within the area and whose households qualify for affordable housing as reference above shall also be eligible for transit stipends to cover their work commute costs via mass transit. The maximum employer obligation will be 10% of all eligible employees with priority based on household income.
8. **Primary Uses** - Green City Miami shall include employment opportunities in the targeted industries of technology, hospitality & tourism sports and recreation, and agriculture. These various business uses shall be designed according to the following sub-areas along with corresponding residential and institutional uses of an appropriate intensity:
 - a. **Downtown Metropolitan Urban Center** – Office and retail, high density residential, hotels, restaurants, entertainment and civic uses. The average minimum density with a ¼ mile of the center of Downtown Metropolitan Urban shall be 40 dwelling units per gross acre.

- b. **Sports And Health Village Urban Center** – Sports facilities, recreational activities, University/College, hotels, offices, alternative energy manufacturing facilities, health care facilities, museum, convention center, restaurants, entertainment, retail, parks, and limited residential.
- c. **Mid-Town** – Medium density residential, office and retail, restaurants, parks, and K-12 schools.
- d. **East Village** – Lower density residential, recreational activities, restaurants, parks, office and retail.
- e. **Park Village** – Lower density residential, recreational activities, restaurants, parks, office and retail.
- f. **The Preserve** - Farmers market, alternative energy manufacturing facilities, hydroponics farming facilities, and/or related supportive industry, recreational activities, low density housing, parks, preserves, restaurants, office and retail.

GREEN CITY MIAMI SUB-AREAS



9. The specific range and intensity of uses appropriate in the Green City Miami Area may vary by each sub-area as a function of the availability of and ease of access to public services and facilities, and compatibility with neighboring areas.

10. The maximum allowable lot coverage and/or floor area ratio (F.A.R.) shall be as follows within each sub-area:

a. **Downtown Metropolitan Urban Center – F.A.R.**

<u>Height</u>	<u>Maximum</u>	<u>Minimum</u>
<u>Up to 10 stories</u>	<u>3.0</u>	<u>.2575</u>
<u>Up to 15 stories in designated areas</u>	<u>3.0</u>	<u>.2575</u>

Density up to sixty (60) units per acre without bonuses and up to seventy-five (75) units per acre with bonuses:

b. **Sports And Health Village Urban Center** – Buildings with a height up to 4 stories will be permitted a 2.00 maximum F.A.R. with a minimum FAR of .25

c. **Mid-Town** – The maximum F.A.R. for all buildings shall be 2.00. Ground area coverage of principal buildings or structures shall not occupy more than fifty (50%) percent, an additional 10% shall be permitted for outbuildings or garages.

d. **East Village** – The maximum F.A.R. for all buildings shall be 2.00. Ground area coverage of principal buildings or structures shall not occupy more than fifty (50%) percent, an additional 10% shall be permitted for outbuildings or garages.

e. **Park Village** – The maximum F.A.R. for all buildings shall be 2.00. Ground area coverage of principal buildings or structures shall not occupy more than fifty (50%) percent, an additional 10% shall be permitted for outbuildings or garages.

f. **The Preserve** – The maximum F.A.R. for buildings or structures with a height up to 4 stories will be 2.00. Ground area coverage of principal buildings or structures shall not occupy more than fifty (50%) percent, an additional 10% shall be permitted for outbuildings or garages.

11. The F.A.R. shall be based only on developable areas. Environmentally protected resources, and other non-buildable common areas shall not be calculated as part of lot area. Parking facilities shall not be counted towards permitted floor area. Through the zoning review process, the use of particular sites or areas may be limited to something less than the maximum allowed by these regulations. Moreover, special limitations may be imposed where necessary to protect environmental resources or to ensure compatibility with adjacent sites.

12. The total build-out of the Green City Miami area shall be regulated according to the following table:

<u>Sub-Area (Acreage)</u>	<u>Multi Family Dwelling Units</u>	<u>Townhouse Dwelling Units</u>	<u>Single Family Dwelling Units</u>	<u>Retail Floor Area</u>	<u>Office Floor Area</u>	<u>Industrial Floor Area</u>	<u>Government / Institutional / Civic Floor Area</u>	<u>Hotel Units</u>
<u>Sports and Health Wellness Village (121.27 acres)</u>	375 Dwelling units	:	:	192,000 square feet	300,000 square feet	150,000 square feet	275,000 square feet of higher education (College- level) for 500 students, and 10,000 seats in 2 stadiums	400 hotel units
<u>Park Village (159.19 acres)</u>	1,100 dwelling units	500 dwelling units	:	75,000 square feet	56,000 square feet	:	:	:
<u>The Preserve (155.87 acres)</u>	700 dwelling units	420 dwelling units	:	60,000 square feet	54,000 square feet	200,000 square feet	100,000 square feet of government buildings, technical schools, and public services	:
<u>East Village (179.18 acres)</u>	1,240 dwelling units	860 dwelling units	:	155,000 square feet	65,000 square feet	:	:	:
<u>Mid-Town (110.49 acres)</u>	1,706 dwelling units	:	:	130,000 square feet	50,000 square feet		100,000 square feet of Elementary , Middle and High Schools	130 hotel units
<u>Downtown (93.00 acres)</u>	4,500 dwelling units	:	:	750,000 square feet	400,000 square feet	:	:	130 hotel units

Adjustments in the mix of uses are permitted so long as they do not result in an increase in the number of vehicle trips generated.

The Green City Miami Area shall be developed in a manner that is consistent with the adopted goals, objectives, and policies of this plan and with all applicable environmental regulations and other environmentally sensitive areas that are at or adjacent to the site. It is the intent of these policies to brand the west end of Miami-Dade County by promoting a new destination spot for the County that is safe for and with easy access to various forms of transportation (pedestrian, bicycle, busway and vehicular).

2. Proposed Amendments To Land Use Element Policy LU-8F

LU-8F. The Urban Development Boundary (UDB) should contain developable land having capacity to sustain projected countywide residential demand for a period of ~~150~~ years after adoption of the CDMP amendments required to implement the most recent Evaluation and Appraisal Report (EAR), referred to as EAR-based amendments, - plus a 5-year surplus (a total 2045-year Countywide supply beyond the adoption date of EAR-based amendments). During the intervening period prior to the next EAR adoption, CDMP amendments may be adopted to maintain a maximum 20 year Countywide supply from the adoption date of such amendments. The estimation of this capacity shall include the capacity to develop and redevelop around transit stations at the densities recommended in policy LU-7F. The adequacy of non-residential land supplies shall be determined on the basis of land supplies in subareas of the County appropriate to the type of use, as well as the Countywide supply within the UDB. The adequacy of land supplies for neighborhood- and community-oriented business and office uses shall be determined on the basis of localized subarea geography such as Census Tracts, Minor Statistical Areas (MSAs) and combinations thereof. Tiers, Half-Tiers and combinations thereof shall be considered along with the Countywide supply when evaluating the adequacy of land supplies for regional commercial and industrial activities.

3. Proposed New Land Use Element Policy LU-8J

LU-8J. Miami-Dade County recognizes the inherent advantages in master planning larger scale, mixed use development villages (Transit Oriented Villages - TOV) in order to achieve important public benefits. The intent of this policy is to recognize the broader social and economic benefits of TOV developments in assessing the need for TOV plan amendments. TOV s are defined as development sites ranging in size from 500 to 1,000 acres which are planned and designed in accordance with this policy. As an incentive to assemble properties and master plan TOV s, plan amendment applications to include additional acreage in the Urban Development Boundary for a proposed TOV development may utilize a phased allocation process as described in this policy in order to demonstrate that the intent of Policy LU-8F is achieved, subject to the following requirements:

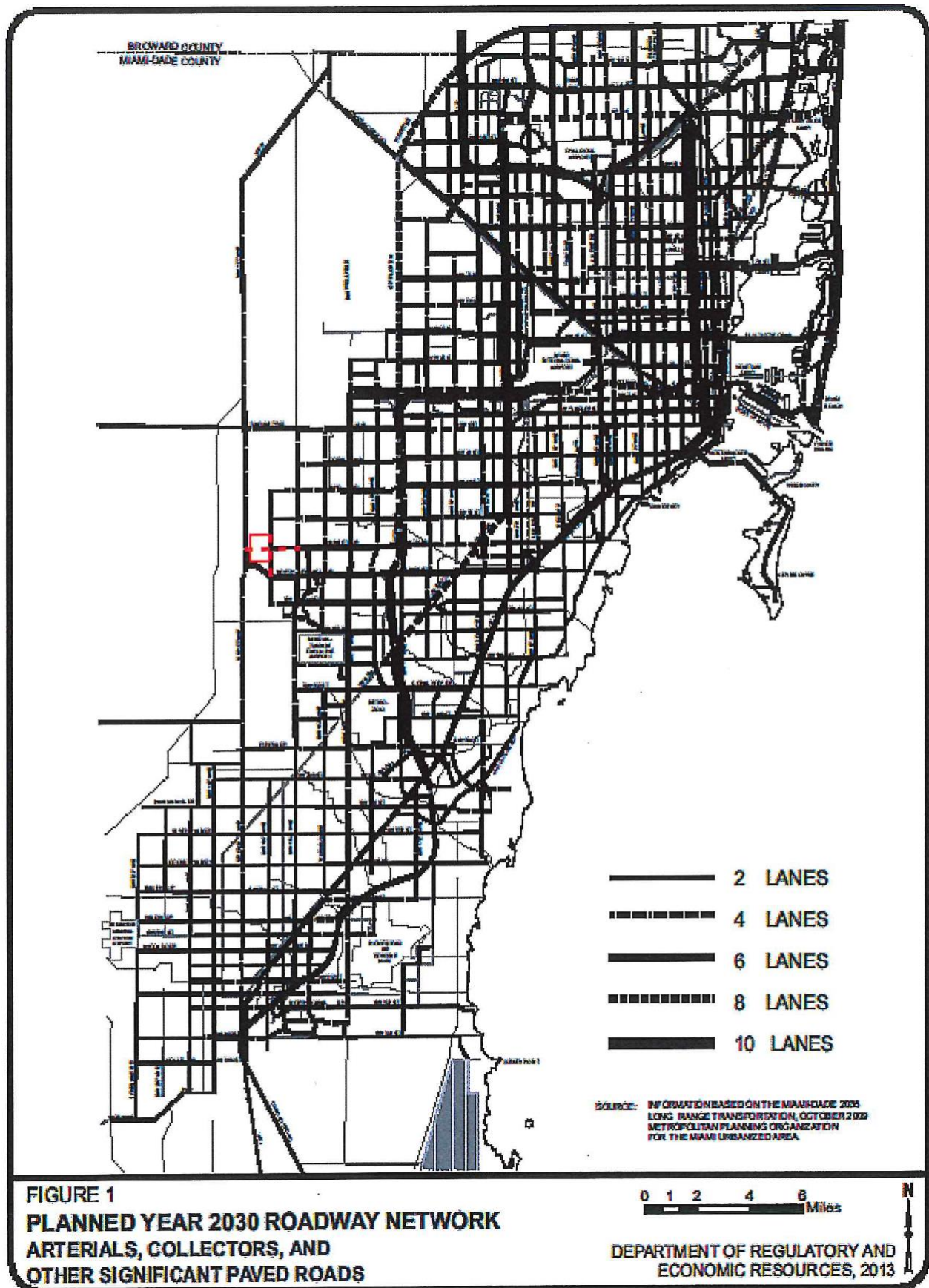
- i.) TOV plan amendments adopted pursuant to the requirements of this policy may phase up to 25% of the residential units allowed by the plan amendment (Phased Allocation) by calculating Countywide residential demand for a period of five years beyond the 20-year planning period set forth in the Policy LU-8F in order to demonstrate need as follows:
 - a. The Phased Allocation for a single amendment application shall not exceed 10% of the additional Countywide UDB demand as calculated for the five-year period following the 20-year UDB planning period;
 - b. Phased Allocations from multiple amendments shall not cumulatively exceed 30% of the additional Countywide UDB demand as calculated for the five-year period following the twenty-year UDB planning period;
 - c. The Phased Allocation shall not be developed within the initial five-year period following adoption of the amendment; and

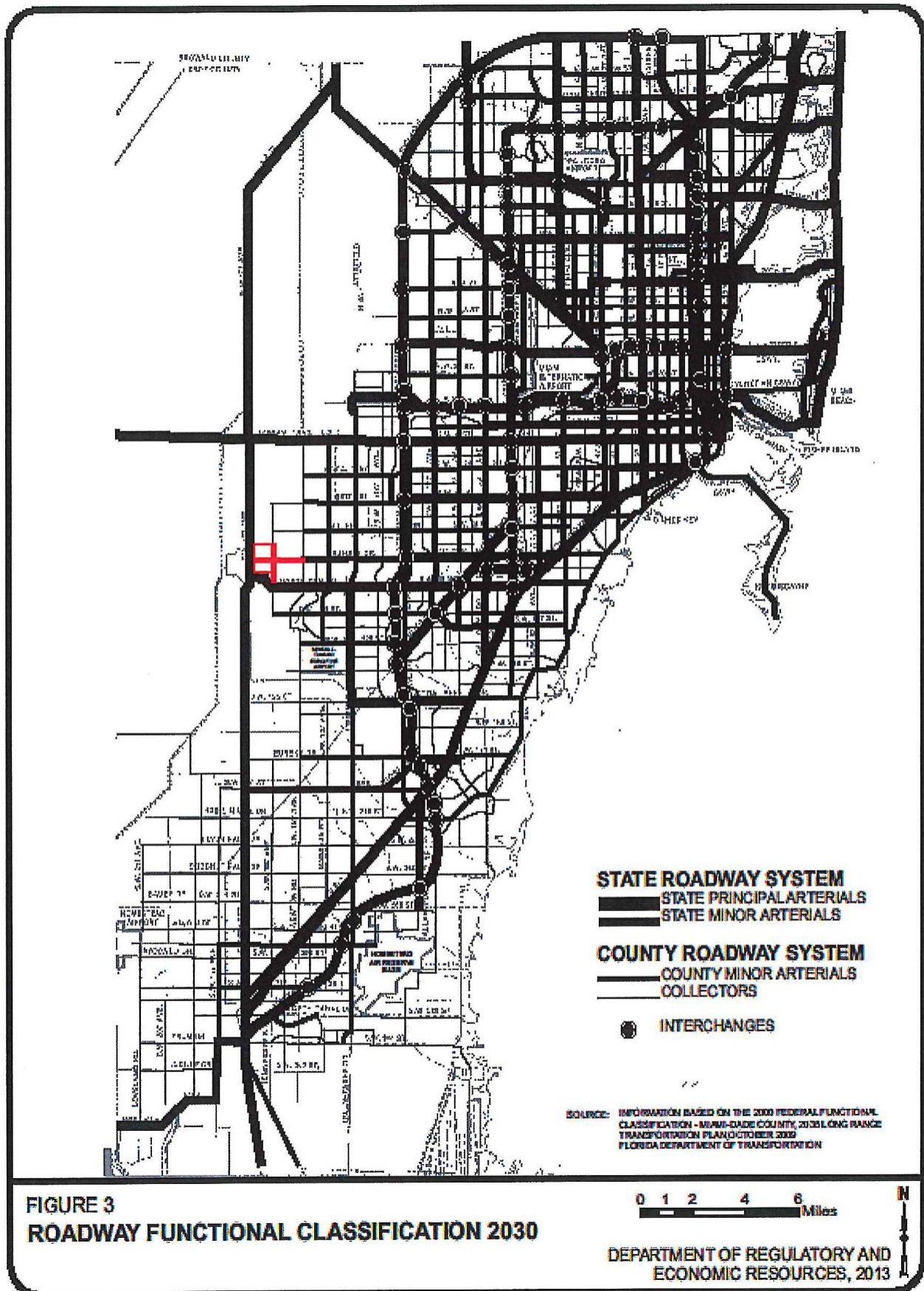
- d. The total acreage included within the TOV plan amendment must be under unified ownership or unified control as confirmed by letters from landowners consenting to the inclusion of their land within the proposed amendment site, and consenting to the majority landowner master planning the amendment site through the Planned Unit Development process.
- ii.) The proposed amendment shall adopt a site-specific, future land use category, guiding principles and an illustrative plan to define the allowable range of housing types and density ranges, non-residential use types and intensity ranges, and overall development concept. The guiding principles shall direct the implementation process at the zoning stage to ensure that the development concept is implemented in accordance with the requirements of this policy, Policy LU-8H and the proposed amendment. TOV's shall be approved as Planned Unit Developments, and shall be further implemented by the adoption of a site specific, form-based code which shall be adopted in conjunction with the zoning ordinance. The guiding principles and illustrative plan shall demonstrate that the proposed amendment is consistent with Policy LU-8H and the requirements of this policy, and shall further define land use spatial relationships, urban form and multimodal/transit design to facilitate multimodal trip opportunities. TOV s shall be designed to support premium bus service and shall include a primary transit hub as an integral feature of the development. The proposed amendment shall devote a minimum of 32% of the site to research and development, employment center uses and/or non-residential uses which are unique in nature, under-represented within Miami Dade County or would have a significant catalyst effect in creating secondary and induced job creation.
- iii.) The proposed amendment shall include one Metropolitan Urban Center (MUC) and may include additional Community Urban Centers as appropriate for the location of the site, and shall demonstrate compliance with the design criteria for the proposed type(s) of Urban Centers. Residential development within ¼ mile of the center of the Metropolitan Urban Center shall be at an average minimum density of 40 units per gross acre, calculated on a proportionate for mixed use buildings/parcels. The MUC shall encompass at least 50% of the proposed amendment site (excluding school sites and parks).
- iv.) The proposed amendment shall include strategies to support affordable and workforce housing. At a minimum, the proposed development shall comply with one of the two following options or may propose a comparable alternative strategy:
- a. Dedicate affordable and workforce housing equivalent to 10% of all proposed units; of the 10%, 20% shall be dedicated to affordable housing (not exceeding 80% of the AMI) and 80% dedicated to workforce housing (not exceeding 140% of the AMI); or
- b. Provide transit stipends for 10% of eligible workers. As an alternative, employers may establish company van pools for the same number of workers based on household eligibility. Transit stipend means the average bus fare for a non-transfer work trip for a distance of five miles along the primary route to the amendment site. Eligible workers are full time workers employed within the amendment property whose households qualify for affordable housing as referenced above. Priority for eligibility shall be based on household income as a percentage of AMI.

The housing requirement shall be met on an incremental basis in two year increments commencing no later than five years following zoning approval for the TOV. For illustration, if the proposed amendment anticipates build out in four years, then 10% of the total housing

approved during each two year period must comply with the housing sale/rental caps above. Each such unit shall be maintained at the sale/rental limit, adjusting for inflation, for a twenty year period.

The transit voucher/van pool requirement shall be implemented upon the non-residential uses (excluding schools) reaching 50% of the planned square footage buildout or 500,000 square feet, whichever occurs first. Each establishment shall comply with the requirement for its share of the eligible workers employed within the total amendment site. The TOV zoning shall include a formula for this calculation and additional conditions to ensure effective implementation.





STAFF ANALYSIS

Background

The application requests changes to the Miami-Dade County Comprehensive Development Master Plan (CDMP) Adopted 2020 and 2030 Land Use Plan (LUP) map to expand the 2020 Urban Expansion Boundary (UDB) to include a ±859 gross acre site and to redesignate ± 819 gross acres of the site from “Agriculture” to a new land use designation “Green City Miami”.

Portions of this application site was the subject of two prior CDMP applications –Application No. 10 of the November 1995 Application Cycle and Application No. 10 of the April 2005 Application Cycle.

Application No. 10 of the November 1995 Application Cycle sought to redesignate ± 160 gross acres between SW 167th Avenue and SW 169th Avenue and between SW 72nd Avenue and SW 88th St (Kendall Drive) from “Agriculture” to “Low-Medium Density” (135.83 acres) and “Business and Office” (24.17 acres) and include the application site within the UDB. The application was recommended for denial by staff and was subsequently denied by the Miami-Dade Board of County Commissioners.

Application No. 10 of the April 2005 Application Cycle sought to redesignate ± 193.24 gross acres site from “Agriculture” to “Low Density” and include the application site within the UDB. The application site is located between SW 167th Avenue and SW 172nd Avenue and between SW 78th Street and SW 88th Street (Kendall Drive). Staff recommended denial of the application which was subsequently withdrawn by the applicant.

Application Site

Location

The ±859 gross-acre site is located outside the 2020 Urban Development Boundary (UDB) but inside the 2030 Urban Expansion Area (UEA) between SW 167th Avenue and SW 177th Avenue (Krome Avenue) and between SW 64th Street and SW 88th Street (Kendall Drive) in unincorporated Miami-Dade County. The application site is located approximately one mile east of the Everglades National Park. The application site includes the West Wellfield and is wholly located within the West Wellfield Protection Area. (See map series on pages 7-10 through 7-15.)

Existing Land Use

The application site is primarily in agricultural use for vegetables and nursery crops production. A ±40-acre portion of the site between SW 64 Street and SW 72 Street is improved with the County owned and operated West Wellfield and approximately 79 acres are environmentally sensitive areas in natural vegetation. (See Existing Land Use map on page 7-12)

Land Use Plan Map Designation

The application site is currently designated “Institutions, Utilities, and Communications” on the ± 40-acre Wellfield site and “Agriculture” on the CDMP Adopted 2020 and 2030 Land Use Plan (LUP) map, (see “CDMP Land Use” map on page 7-13). The “Institutions, Utilities, and Communications” land use category allows for major hospitals, medical complexes, colleges, universities, regional water-supply, antenna fields, radio and television broadcast towers, wastewater and solid waste utility facilities such as the resources recovery plant, major government office centers and military installations. The “Agriculture” land use category allows

for agriculture which is its primary use and uses that are ancillary to and directly supportive of agriculture and farm residences. Uses ancillary to and directly supportive of agriculture are defined as those uses related to preserving, processing, packaging or selling of agricultural products from Florida, and farm supplies, as well as sale and service of farm machinery and implements, subject to the requirement of Chapter 24 of the County Code. Under the current CDMP land use designations, the site could be developed with a maximum of 163 rural residences at a maximum density of 1 unit per 5 gross acres.

As mentioned above, the application site is located outside the UDB but inside the UEA. The UDB distinguishes the area where urban development may occur through the year 2020 from area where it should not occur. The UEA is comprised of the area between the UDB and the UEA boundary, where current projections indicate that further urban development beyond the UDB may to be warranted at some time in the future beyond the year 2020.

The application requests expansion of the 2020 Urban Development Boundary (UDB) to include the application site which is currently located in the 2030 Urban Expansion Area (UEA). This application also seeks to redesignate the ±819-acre "Agriculture" designated portion of the application site on the LUP map to the proposed new land use designation of "Green City Miami" (see "Proposed CDMP Land Use" map on page 7-14). The "Green City Miami" land use category seeks to allow for a mixed use transit oriented development that includes housing but service needs and workplaces that targets specific industries such as healthcare, medicine, hospitality, tourism, sports, entertainment and technology while promoting a healthy lifestyle with an undeveloped area of Miami-Dade County. Under the applicant's requested "Green City Miami" designation, the application site could be developed with a maximum of 9,621 multi-family units and 1,780 townhouses (total 11,401 residential units), 1,362,000 square feet of retail space, 925,000 square feet of office area, 350,000 square feet of industrial space, 475,000 of government/institution/civic space, and 660 hotel units.

Zoning

The application site is currently zoned GU (Interim District, depend on character of neighborhood, otherwise EU-2 applies). (See "Zoning Map" on page 7-11.)

Zoning History

Miami-Dade County zoning districts and zoning code regulations were first created in 1938. Based on Miami-Dade County's zoning records, the application site was zoned GU (Interim) and no other rezoning has occurred on the property to date.

Adjacent Land Use and Zoning

Existing Land Uses

The properties to the north of the application site is vacant land that is both unprotected privately owned land and protected government owned land and vacant land. Properties east of the application site include single family residences, townhouses, two-family duplexes, vacant land, with offices and commercial uses to the south east of the site along Kendall Drive. The office and commercial uses include the Lucky Start Executive Plaza, a BJ's wholesale club, Office Max, a Petsmart, the Kendall Plaza 162 and Kendall Park Plaza shopping plazas with supermarkets fast food restaurants and other uses, and the underdeveloped Kendall Town Center that includes the West Kendall Baptist Hospital. Further east along Kendall Drive at the intersection of SW 157 Avenue are Home Depot, a Walmart, and other commercial uses within a commercial node at the intersection. Properties south of the site beyond Kendall Drive include agricultural land used for vegetable farming, the Kendall Square single-family and townhouse development currently under

construction, the Forest Lake Plaza and Shoppes of Paradise Lakes shopping centers that include retail uses such as a Walgreens, a Bank, an auto store, fast food restaurants and a Publix Supermarket. The properties west of the site beyond Krome Avenue include agricultural land and a rockmining operation. (See Existing Land Use map on pages 7-12.)

Land Use Plan Map Designations

Properties abutting north of the application site are designated “Institutions, Utilities, and Communications” and “Agriculture” on the LUP map and as “Open Land” further north beyond theoretical NW 56 Street. The properties east and southeast are designated “Low Density Residential” (2.5 to 6 dwelling units per gross acre), “Business and Office” and “Office/Residential” on the LUP map. Properties south of the application site are designated “Agriculture”, “Business and Office”, and “Low Density Residential” on the LUP map. The properties adjacent to west are designated “Agriculture” on the LUP map. The Kendall Drive corridor from approximately SW 162 Street to US-1 is designated as a Future Rapid Transit corridor and there is a designated community urban center along Kendall Drive at just west of SW 157 Avenue. (See “CDMP Land Use” map on page 7-13.)

Zoning

The properties to the north of the application site are zoned AU (Agricultural/Residential 5 gross acres). The properties to the east of the application site are zoned as RU1-MA (Modified single-family residences, 5000 net square feet), RU-1MB (Modified single-family residences, 6000 net square feet), RU-3M (Minimum Apartment House, 12.9 units/net acre), GU (Interim District, depend on character of neighborhood, otherwise EU-2 applies), BU-1A (Business, limited), and OPD (Office park, 20 acres min.). Properties to the south of the site are zoned RU-1 (Single-family residences, 7500 net square feet), RU-3M Minimum Apartment House, 12.9 units/net acre), RU-4L (RU-4 or Hotel/Motel, 23 units/acre), RU-TH (townhouse, 8.5 units/net acre), TND (Traditional neighborhood development, 40 min gross acres), GU (Interim District, depend on character of neighborhood, otherwise EU-2 applies), and BU-1A(Business, limited). Properties to the west of the site are zoned AU (Agricultural/Residential 5 gross acres), GU (Interim District, depend on character of neighborhood, otherwise EU-2 applies), and IU-3 (Industrial, unlimited manufacturing). (See Zoning Map on page 7-11.)

Supply and Demand Analysis

The capacity of the LUP map to accommodate population or economic growth is generally expressed in acres of vacant land zoned or designated for residential and non-residential development. In the context of this application that requests expansion of the Urban Development Boundary (UDB) land capacity is analyzed consistent with Policy LU-8F of the CDMP Land Use Element. Land Use Element Policy LU-8F requires the UDB to contain adequate developable land (land supply) having the capacity to accommodate the County’s projected population and economic growth. Policy LU-8F requires the UDB to contain adequate developable land with the capacity to sustain residential growth for a period of 15 years after adoption of the most recent CDMP Evaluation and Appraisal Report (most recently adopted in March 2011). Additionally, the policy requires the adequacy of non-residential land supply within the UDB to be determined by countywide supply as well as by subareas of the County appropriate to the type of use. The adequacy of commercial land is determined by Minor Statistical Areas (MSAs) and combinations thereof, and the adequacy of industrial land is determined by planning analysis tiers, half-tiers and combinations thereof.

The application site is located in MSA 6.1 along the boundary abutting MSA 6.2. The application proposes residential, commercial and industrial development therefore the analysis below

evaluates the supply of land for each of these proposed type of use. The countywide residential land supply is presented in keeping with the referenced Policy LU-8F and is also presented at the MSA level for informational purposes. The commercial land supply is evaluated at the MSA level, combination of MSAs 6.1 and 6.2, the commercial analysis area. The industrial land supply is evaluated at the countywide level and at the Planning Analysis Tier level.

Residential Land

The combined vacant land for single-family and multi-family residential development countywide in 2015 was estimated to have a capacity for about 158,718 dwelling units, with approximately 77 percent of these units intended for multi-family use. The annual average residential demand countywide is projected to increase from 9,547 units per year, in the 2015-2020 period, to 11,676 units in the 2025-2030 period. An analysis of the residential capacity by type of dwelling units shows the depletion of single-family units occurring in 2022 and for multi-family beyond 2030 (see “Residential Land Supply/Demand Analysis-Countywide” table below). The supply of residential land for both single-family and multi-family units is projected to be depleted by the year 2030.

Residential Land Supply/Demand Analysis
2015 to 2030: (countywide)

ANALYSIS DONE SEPARATELY FOR EACH TYPE, I.E. NO SHIFTING OF DEMAND BETWEEN SINGLE & MULTI-FAMILY TYPE	STRUCTURE TYPE		
	SINGLE-FAMILY	MULTIFAMILY	BOTH TYPES
CAPACITY IN 2015	358,858	122,860	15,8718
DEMAND 2015-2020	4,957	4,590	9,547
CAPACITY IN 2020	11,073	99,910	110,983
DEMAND 2020-2025	5,393	4,920	10,273
CAPACITY IN 2025	0	75,310	59,618
DEMAND 2025-2030	6,041	5,635	11,676
CAPACITY IN 2030	0	47,135	1,238
DEPLETION YEAR	2022	2030+	2030

Residential capacity is expressed in terms of housing units.

Housing demand is an annual average figure based on population projections.

Source: Miami-Dade Department of Regulatory and Economic Resources, Planning Division, Planning Research Section, July 2015.

The combined vacant land for single and multi-family residential development in the Analysis Area (Minor Statistical Area 6.1 & 6.2) in 2015 was estimated to have a capacity for approximately 3,911 dwelling units, with about 55 percent of these units intended for multi-family residential use. The annual average residential demand in this Analysis Area is projected to increase from 817 units per year, in the 2015-2020 period, to 855 units in the 2025-2030 period. An analysis of the residential capacity by type of dwelling units shows the depletion of single-family units occurring in 2017 and for multi-family by the year 2027 (see “Residential Land Supply/Demand Analysis for MSAs 6.1 & 6.2” table below). The supply of residential land for both single-family and multi-family units is projected to be depleted by the year 2019. The proposed application, if approved, is projected to increase single-family type capacity by 1,780 units and multi-family by 9,621. This will extend the depletion year of single-family to the year 2021, for multi-family well beyond the year 2030, and for both types beyond the year 2030.

Residential Land Supply/Demand Analysis
2015 to 2030: (MSA 6.1 & 6.2)

ANALYSIS DONE SEPARATELY FOR EACH TYPE, I.E. NO SHIFTING OF DEMAND BETWEEN SINGLE & MULTI-FAMILY TYPE	STRUCTURE TYPE		
	SINGLE-FAMILY	MULTIFAMILY	BOTH TYPES
CAPACITY IN 2015	1,768	2,143	3,911
DEMAND 2015-2020	643	174	817
CAPACITY IN 2020	0	1,273	0
DEMAND 2020-2025	649	175	824
CAPACITY IN 2025	0	398	0
DEMAND 2025-2030	674	181	855
CAPACITY IN 2030	0	0	0
DEPLETION YEAR	2017	2027	2019

Residential capacity is expressed in terms of housing units.

Housing demand is an annual average figure based on population projections.

Source: Miami-Dade Department of Regulatory and Economic Resources, Planning Division, Planning Research Section, July 2015.

Industrial Land

The County has 3,731.70 acres of vacant land zoned or designated for industrial uses; with an average annual absorption rate of 167.82 acres of industrial land, the county is projected to deplete its vacant industrial land beyond 2030. The South-Central Tier, where the application is located, has 148.80 acres of vacant land zoned or designated for industrial uses; with an average annual absorption rate of 23.86 acres of industrial land, this Tier is projected to deplete its vacant industrial land by the year 2021.

Projected Absorption of Industrial
Land Miami- Dade County, Florida 2015 - 2030

Minor Statistical Area	Vacant Industrial Land 2015 (Acres)	Industrial Land in Use 2015 (Acres)	Average Annual Absorption Rate 2015-2030 (Acres)	Projected Year of Depletion
<u>South-Central Tier</u>				
5.3	12.40	50.90	0.00	--
5.4	0.50	159.70	0.00	--
5.5	0.00	88.00	1.36	2015
5.6	0.60	13.30	0.09	2022
5.7	0.00	2.10	0.17	2015
5.8	0.00	13.40	0.00	--
6.1	0.00	12.20	0.43	2015
6.2	135.30	627.40	21.81	2021
Subtotal	148.80	971.90	23.86	2021
<u>Countywide</u>				
Total	3,731.70	12,396.30	167.82	2030+

-- Insignificant Demand

Source: Miami-Dade County, Department of Regulatory and Economic Resources, Planning Division, Research Section, June 2015.

Commercial Land

The County has 2,494.4 acres of vacant land zoned or designated for commercial uses; with an average annual absorption rate of 105.7 acres of commercial land, the county is projected to deplete its vacant commercial land beyond 2030. The South-Central Tier, where the application is located, has 313.8 acres of vacant land zoned or designated for commercial uses; with an average annual absorption rate of 26.13 acres of commercial land, this Tier is projected to deplete its vacant commercial land by the year 2027. (See "Projected Absorption of Land for Commercial Uses" table below.)

The Analysis Area (MSAs 6.1, and 6.2) contained 1,070.70 acres of in-use commercial uses in 2015 and an additional 248.70 acres of vacant land zoned or designated for commercial uses. The annual average absorption rate for the 2015-2030- period is 18.58 acres per year. At the projected rate of absorption, reflecting the past rate of commercial uses, the study area will deplete its supply of commercially zoned land by the year 2028. It should be noted that the study area also contains approximately 38.5 acres zoned for mixed uses that could be utilized for commercial uses. Whatever amount of the mixed-use acres that will be utilized for commercial uses will only serve increase the supply commercial land and extend the depletion year of commercial land.

Projected Absorption of Land for Commercial Uses
Indicated Year of Depletion and Related Data
Countywide, and MSA 6.1 & 6.2

Analysis Area	Vacant Commercial Land 2015 (Acres)	Commercial Acres in Use 2015	Annual Absorption Rate 2015-2030 (Acres)	Projected Year of Depletion	Total Commercial Acres per Thousand Persons	
					2020	2030
Countywide	2,494.4	12,529.2	105.7	2030+	5.5	5.0
6.1	33.8	525.10	6.97	2020	2.9	2.7
6.2	214.9	545.60	11.61	2030+	4.8	4.7
MSAs Total	248.70	1,070.70	18.58	2030+	3.7	3.6

Source: Miami-Dade County, Department Regulatory and Economic Resources, Planning Division, Planning Research & Economic Analysis Section, July 2015

Environmental Conditions

The following information pertains to the environmental conditions of the application site. All YES entries are further described below.

Flood Protection

Federal Flood Zone	AE, AH & X
Stormwater Management Permit	SFWMD Environmental Resources Permit
County Flood Criteria, National Geodetic Vertical Datum (NGVD)	9.5 feet

Biological Conditions

Wetlands Permit Required	Yes
Native Wetland Communities	Yes
Specimen Trees	Undetermined
Endangered Species Habitat	Undetermined

Natural Forest Community No

Other Considerations

Within Wellfield Protection Area	Yes West Wellfield Interim protection area
Hazardous Waste	No
Contaminated Site	No DERM records, however, includes agricultural uses*

Wellfield Protection

The subject application is located entirely within the West Wellfield Interim protection area. The source of water for this wellfield, as well as the other wellfields in the County, is the Biscayne Aquifer. The Biscayne Aquifer is a highly transmissive unconfined aquifer vulnerable to contamination. The Board of County Commissioners has adopted ordinances that establish wellfield protection zones in response to the documented association between land use and groundwater contamination. These ordinances prohibit land uses that use, handle, generate, dispose of or store hazardous materials and hazardous waste within wellfield protection areas, including within the West Wellfield Interim protection area. These ordinances also establish restrictions for land use, sewage loading (if the proposed development were to connect to public sanitary sewers) and stormwater disposal that were intended to ensure pristine water quality within this wellfield by excluding land uses that could compromise groundwater quality and pose a threat to drinking water resources.

The proposed Green City Miami land use category proposes several distinct sub-areas identified as the Downtown Metropolitan Urban Center, Sports and Health Village Urban Center, Mid-town, East Village, and Park Village. The proposed Sports and Health Village Urban Center would allow sports facilities, university/college, alternative energy manufacturing facilities, health care facilities, among other uses, and would be located almost entirely within the 10 day travel-time contour of the West Wellfield Interim protection area. This area of the wellfield includes a total prohibition of hazardous materials and hazardous wastes. Policy CON-3A states “No new facilities that use, handle, generate, transport or dispose of hazardous wastes shall be permitted within wellfield protection areas...”. The proposed land uses within this sub-area are land uses that typically have hazardous materials and hazardous wastes. Pursuant to Section 24-43 of the Code, land uses within the 10 day travel-time of a wellfield protection area (assuming to be served by public sanitary sewers and within the UDB) are subject to a sewage loading restriction of 850 gallons per day per acre. Assuming the land uses for this subarea could be approved, the proposed sewage loading would be approximately 1,820 gallons per day per acre or more than 200% of the allowable sewage loading.

The Park Village sub-area would be located within the 10, 30 and 100 day travel-time of the West Wellfield Interim protection area. Portions of this sub-area within the 10-day travel-time would be restricted to 850 gallons per day per acre, and the portion within the 30-day travel-time would be restricted to 1,600 gallons per day acre. The applicant did not provide sufficient information to determine if the development in this sub-area would comply with the sewage loading restrictions.

The existing land uses currently surrounding the West Wellfield Interim protection area in the proposed application (agriculture and wetlands) provide for maximum wellfield recharge from local rainfall because the lands provide ample pervious surface area. The application proposes to convert this large, permeable area to urban uses that are dominated by impervious areas. The hydrologic study provided states that the “...groundwater table elevation at the site fluctuates primarily in response to a) rainfall in the short-term (hours to days), and cyclical, seasonal rain variability in the intermediate-term (months to years)....” Policy CON-3B of the CDMP requires

that “water management systems that recharge regional wellfields shall be protected and enhanced.”

Objective CON-4 states that the “aquifer recharge and water storage capacity of the presently undeveloped areas in western and southern Miami-Dade County shall be maintained or increased.” Urban uses change the water quality and timing of runoff when compared with open land. The applicant has not provided sufficient information demonstrating that the proposed uses will protect and enhance the recharge characteristics of the land. Policy CON-5F requires cut and fill criteria in order to “protect natural hydrological characteristics of the basins, protect against flooding of developed land in the basins and downstream, and ensure continued proper recharge of groundwater supplies”. The Applicant’s Master Plan shows a network of green spaces and lakes, but does not demonstrate consistency with the required cut and fill criteria, specifically the required 38% dry retention area.

The West Wellfield Interim protection area was established in the farthest reaches of the County in order to protect the water quality and quantity of this wellfield from the effects of urban encroachment. It is not clear whether the requested new CDMP land use category would allow land uses or drainage system installations that could pose a future threat to water quality of the wellfield, contrary to protections established in Section 24-43 of the Code. In addition, the Applicant’s Master Plan shows an interconnected network of open water areas, but it is not clear whether any of these proposed lakes are located within the 30-day travel time zone of the West Wellfield, where lakes are not allowed.

Based on the information provided in the Application, it is not clear how the applicant could comply with the sewage loading requirements and cut and fill criteria discussed in the preceding paragraphs without seeking numerous variances to Chapter 24 of the County Code to allow for the maximum proposed development. In order to comply with the requirements of Chapter 24, the maximum development program would need to be substantially reduced which could result in the development of sprawl-type development. A large portion of subject property is located within the 10-day (± 200 acres) and 30-day travel-time (± 220 acres) of the West Wellfield Interim Protection Area where sewage loading per acre is limited to 850 gpd and 1600 gpd, respectively. Based on Chapter 24-43.1 of the Code of Miami-Dade County, sewage flows for a townhouse residence are estimated to be 180 gpd/unit. This would allow for a maximum of 4 units per acre in the 10-day travel-time and 8 units per acre in the 30-day travel time. CDMP Policy LU-8H requires minimum average density of 10 dwelling units per gross acre for applications requesting expansion of the Urban Development Boundary to prevent sprawl-type development. Since the development proposed in the Application does not comply with the maximum sewage loading requirement, the applicant has not demonstrated compliance with the minimum average density required by CDMP Policy LU-8H.

Pollution Remediation

There are no DERM records of current or historical contamination issues on the property or on sites directly abutting the application site. Based on the agricultural use of the site, it is recommended that a Phase 1 and Phase 2 Environmental Assessment be conducted on the property prior to development. Site development may require review and approval from the Environmental Monitoring and Restoration Division of DERM.

Drainage and Flood Protection

The subject application is located within the Bird Drive Basin and is subject to Cut and Fill approval. Pursuant to the Code, any development within this area shall set aside surface water management areas in accordance with Sections 24.48.2(l)(B)(1)(f), (g) & (h) of the Code.

Furthermore, to maintain groundwater quality within the West Wellfield Interim protection area, the installation of drainage systems is restricted pursuant to Section 24-43 of the Code. For example, no stormwater disposal is allowed within 100 feet or less of potable water supply wells, only dry retention areas are allowed within the 10 day travel time contour, lakes are prohibited within the 30-day travel time contour, only exfiltration trenches without outfalls or dry retention area are allowed within the 30 day travel time contour. The applicant has not demonstrated how the proposed development would comply with the Bird Drive Basin Cut and Fill Criteria and the stormwater restrictions within the wellfield protection area.

The proposed development order, if approved, would be required to meet the Level of Service standards for flood protection set forth in the CDMP.

Natural Resources

The application does not adequately address the proximity of the application to Comprehensive Everglades Restoration Program (CERP) and non-CERP Everglades restoration projects. Pursuant to Policy CON-7J, when “evaluating applications that will result in alterations or adverse impacts to wetlands, Miami-Dade County shall consider the applications’ consistency with the Comprehensive Everglades Restoration Program (CERP) objectives. Applications that are found to be inconsistent with CERP objectives, projects or features shall be denied.”

Several Everglades Restoration projects that affect this region of the County, including but not limited to Modified Water Deliveries to Everglades National Park and the related operational plans for the South Dade Conveyance System, plus the Everglades National Park Seepage Management Project, have not been finalized. The provided Hydrological Study documents regionally altered water levels in the past decade, indicating that the area of influence for these projects may extend well beyond the immediate footprint of the infrastructure of these regional restoration projects. Full implementation of CERP will likely result in additional necessary changes to canal water levels. Development in this area could constrain full implementation of CERP; it is within the best interest of both the applicant and the County to have a comprehensive understanding of the full implications of these projects during the review of this application.

The applicant has provided inconsistent and insufficient information on hydrology in the application area. Without complete and accurate information, it is not possible to determine the impact of the proposed application on regional water resources, including the West Wellfield Interim protection area. For example, the Hydrological Study states that the “groundwater gradient at the Site generally follows the regional gradient with higher groundwater elevations to the west”, however, the Study provides other information that indicates that groundwater elevations in this area are lower to the west (Hydrological Study, Figure 6) and are controlled by drainage canals to the west and north. The Study, when discussing groundwater trends over time, states that “(g)roundwater levels at the Site and surrounding areas are subject to canal stages maintained by the SFWMD in the Tamiami Canal ... north of the Site and the L-31N canal ... west of the site”. Topography controls water flow at small scales, and the topography in the proposed application area slopes roughly from southeast to northwest, opposite to the stated gradient in the report. The report also appears to have inaccuracies in presenting the effect of the West Wellfield Interim protection area on the region. Figure 11 of the Hydrological Study illustrates an estimated drawdown cone for the West Wellfield Interim protection area that appears to exaggerate the effect of wellfield pumping when compared with actual monitoring data provided by Miami-Dade County’s Water and Sewer Department (Miami-Dade WASD, West Wellfield Monitoring Data Update, August 2000). This estimated cone was developed using local piezometer data, but compares the data to estimated groundwater levels for which no explanation is provided on how the levels were estimated. It is unclear, for example, whether the estimate for groundwater levels

in the absence of wellfield pumping accounts for irrigation water used by the agricultural operations that completely surround the wellfield to the east, south, and west.

Information provided in the Hydrological Study demonstrates an inconsistency with Policy CON-4A, which states, in part, “The aquifer-recharge values of undeveloped land and the water storage values of wetland areas shall be maintained and, where feasible, enhanced or restored.” The report demonstrates that local precipitation is a strong determinant of local water levels, and is therefore, a substantial source of recharge to the West Wellfield. The report states: “Precipitation by far exerts the most dominant influence on short term groundwater fluctuations and can completely mask the effects of groundwater withdrawal associated with the well field.” The existing land uses surrounding the West Wellfield Interim protection area in the proposed application area (agriculture and wetlands) are pervious and provide for maximum wellfield recharge from local rainfall. The re-designation of these lands from agricultural to mixed use will undoubtedly result in an increase in impervious areas, thus negatively affecting wellfield recharge, inconsistent with Policy CON-4A.

The applicant has not provided sufficient information on wetland function and wildlife utilization to determine the impact of the proposed application on natural resources. Specifically, the applicant has not demonstrated that the proposed application is consistent with Objective LU-3, which states in pertinent part that the “...location, design and management practices of development and redevelopment in Miami-Dade County shall ensure the protection of natural resources and systems by recognizing, and sensitively responding to constraints posed by soil conditions, topography, water table level, vegetation type, wildlife habitat ...”. The applicant has also not provided sufficient information to determine whether the proposed application is consistent with objectives and policies of the CDMP, including but not limited to CON-9B, that protect feeding, roosting, and nesting habitat of threatened or endangered species. As discussed in the following paragraphs, there is sufficient information already available about this area to believe that the proposed application is not consistent with such objectives and policies.

While, the applicant acknowledges the presence of over 80 acres of wetlands on the site, the submitted Environmental Evaluation report states that there was a “ cursory biological field investigation” on a single day during the dry season to evaluate wetland function of over 80 acres of mapped wetlands located in over a dozen different locations. The report includes no surveys that were conducted during the wet season, when utilization of the area by threatened or endangered species is the most likely. The wetlands in the application area are located slightly more than a mile from Everglades National Park, therefore, utilization of wetland habitat and seasonally flooded agricultural lands for feeding by threatened or endangered species such as the federally threatened wood stork would be expected. The survey cannot adequately assess the potential impact of this application on natural resources when it does not identify all of the resources that may be impacted. For example, the Bird Drive Everglades Basin/Pennsuco Wetlands Vegetation and Cover Type Mapping Study (DERM Technical Report 89-5) indicates that there are tree islands in the application area, yet no tree islands were identified in the vegetation map provided. Tree islands frequently contain plants protected by the State of Florida and/or artifacts of historical and archaeological significance. Tree islands are protected in the Bird Drive Basin pursuant to Section 24-48 of the Code, and must be preserved.

Land elevations and groundwater stages reported in the Hydrologic Study indicate that large swaths of the agricultural lands in the application area are likely to be flooded in the wet season. Seasonally flooded agricultural lands such as these, especially when co-located with wetlands, have been observed to provide important foraging and roosting habitat in the wet season for various types of wildlife, including mammals, reptiles and amphibians, and birds. Bird species

utilizing this type of habitat include but are not limited to wading birds, some of which are threatened, endangered, or otherwise protected species, and shorebirds, which are protected under the Migratory Bird Treaty Act. The following state or federally protected birds that occur in Miami-Dade County are known to forage in flooded agricultural fields: wood stork (Federal, Threatened), little blue heron (State, Species of Special Concern), reddish egret (State, Species of Special Concern), roseate spoonbill (State, Species of Special Concern), snowy egret (State, Species of Special Concern), tricolored heron (State, Species of Special Concern), white ibis (State, Species of Special Concern). In addition, snail kites (federally endangered) nest nearby in Everglades National Park and Water Conservation Area 3B, and may forage in wetlands and agricultural drainage ditches where apple snail populations can persist.

In addition, the open land characteristics of the agricultural land, in combination with the interspersed woody vegetation of the wetlands, fit the description of habitat favored both by the federally endangered bonneted bat (this area is within the Consultation Area for the bonneted bat) and the federally threatened Eastern indigo snake. Finally, bald eagles and golden eagles have been observed to forage on agricultural lands. These species are no longer listed as threatened or endangered, but are still federally protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

The submitted Environmental Evaluation does not address utilization by any of these protected species. In order to do so, the evaluation must include results from comprehensive surveys over multiple years and including both dry and wet seasons, to document wildlife utilization. These types of surveys are important because they provide more meaningful scientific data in areas with seasonally flooded wetlands, where environmental benefits can vary according to time of year and recent history of rainfall.

Water and Sewer

Water Supply

The source of water for this area is the Alexander Orr Water Treatment Plant which is owned and operated by MDWASD. At the present time, there is adequate treatment and water supply capacity for this application. The plant is presently producing water that meets Federal, State, and County drinking water standards.

Water Treatment Plant Capacity

The County's adopted LOS standard for potable water treatment facilities requires that the regional water treatment system, consisting of Hialeah, Preston and Alexander Orr District Treatment Plants, shall operate with a rated maximum daily capacity no less than two percent above the maximum daily flow for the preceding year and an average two percent above the average daily flow for the preceding five years. The water must also meet all applicable federal, state, and county primary drinking water standards.

The regional water treatment system has a rated design capacity of 439.74 million gallons per day (MGD). Based on the LOS standard, the capacity of the regional water treatment system is equivalent to 430.95 MGD. The total available water treatment plant capacity, 63.54 MGD, is calculated using the available plant capacity (430.95 MGD), subtracting the maximum day flow (343.2 MGD) and subtracting the water that is reserved through development orders (24.21 MGD). The maximum development proposed in the application would result in a reduction in the total available water treatment plant capacity by approximately 3.4%.

As noted in the “Estimated Water Demand/Sewer Flow for Proposed Development by Land Use Scenario” table below, the maximum water demand for Residential (Scenario 1) development under the current CDMP Land Use designations, is estimated at 35,860 gallons per day (gpd). The maximum water demand for the mix of uses outlined in the proposed CDMP text (Scenario 1) under the Requested CDMP Land Use designations, are estimated at 2,162,000 gpd. This represents an increase of up to 2,126,140 gpd over the demand under the current CDMP land use designations. A Water Supply Certification Letter will be required at the time of development, at which time the proposed project will be evaluated for water supply availability and a water supply reservation will be made.

Estimated Water Demand/Sewer Flow
For Proposed Development by Land Use Scenario

Scenario	Use (Maximum Allowed)	Quantity (Units or Square Feet)	Water Demand Multiplier (Section 24-43.1 Miami-Dade Code)	Projected Water Demand (gpd)
Current CDMP Potential				
1	Residential	163 units	220 gpd	35,860 gpd
Requested CDMP Designation				
1	Residential	1,780 townhomes	180 gpd	320,400 gpd
1	Residential	9,621 multi-family	150 gpd	1,443,150 gpd
1	Business	1,362,000 sq. ft. retail	10 gpd/100 sq. ft.	136,200 gpd
1	Business	925,000 sq. ft. office	5 gpd/100 sq. ft.	46,250 gpd
1	Industrial	350,000 sq. ft.	20 gpd/100 sq. ft.	70,000 gpd
1	Institution (College)	275,000 sq. ft.	12 gpd/100 sq. ft.	33,000 gpd
1	Institution (K-12)	100,000 sq. ft.	12 gpd/100 sq. ft.	12,000 gpd
1	Gov't Offices/Public Services	100,000 sq. ft.	5 gpd/100 sq. ft.	5,000 gpd
1	Hotel	660 rooms	100 gpd/room	66,000 gpd
1	Stadium	10,000 seats	3 gpd/seat	30,000 gpd
TOTAL				2,162,000

Source: Miami-Dade Water and Sewer Department; Department of Regulatory and Economic Resources, Planning Division; July 2015

Water System Connectivity:

The comments provided herein are subject to UDB expansion approval and compliance with all applicable provisions in the County's CDMP and in Chapter 24 of the Code of Miami-Dade County for the protection of the West Wellfield. Pursuant to Chapter 24 of the Code, the proposed development would be required to connect to the public water system if located inside the Urban Development Boundary. Per Miami-Dade County Water and Sewer Rules and Regulations, a minimum 16-inch water mains will be required along Section lines and a minimum 12-inch water mains will be required along half section lines. In addition, minimum 8-inch water mains will be

required along the frontage of residential developments and minimum 12-inch water mains along the frontage of all commercial developments. Currently, there is an existing 16-inch water main along SW 167th Avenue from SW 64th Street to SW 88th Street. Also, there is approximately 1,700 linear feet of a 24-inch and 30-inch water main along SW 88 Street west of SW 167th Avenue, a 24-inch water main along SW 72nd Street from SW 167th Avenue to SW 172nd Avenue, and a 16-inch water main along SW 172nd Avenue from SW 72nd Street to approximately SW 66th Avenue.

Sewer Treatment Plant Capacity

The County's adopted LOS standard for wastewater treatment and disposal requires that the regional wastewater treatment and disposal system, consisting of North, Central, and South District Wastewater Treatment Plants, operate with a capacity that is two percent above the average daily flow for the preceding five years and a physical capacity of no less than the annual average daily sewer flow. The wastewater effluent must also meet all applicable federal, state, and county standards and all treatment plants must maintain the capacity to treat peak flows without overflow.

The regional wastewater treatment system can treat up to 375.5 million gallons per day (MGD). Based on the LOS standard, the capacity of the regional wastewater treatment system is equivalent to 368.14 MGD. The available capacity is calculated by subtracting the annual average flow (307.73 MGD) for the preceding 5 years and the capacity reserved for development orders (31.07 MGD) from the system capacity (368.14 MGD). Therefore, the available wastewater treatment plant capacity is 29.34 MGD. The maximum development proposed in the application would result in a reduction in the available wastewater treatment plant capacity by approximately 7.4%.

Sewer System Connectivity:

The comments provided herein are subject to UDB expansion approval and compliance with all applicable provisions in the County's CDMF and in Chapter 24 of the Code of Miami-Dade County for the protection of the West Wellfield. Pursuant to Chapter 24 of the Code, the proposed development would be required to connect to the public sanitary sewer system if located inside the Urban Development Boundary. Application No. 7 is located within the MDWASD franchised service area. The wastewater flows for this application will be transmitted to the South District Wastewater Treatment Plant (SDWWTP) for treatment and disposal. Currently, there is average wastewater treatment capacity for this application consistent with Policy WS-2A(2) of the CDMF.

Per MDWASD's Rules and Regulations, a public pump station will be required for every quarter section of land. New sanitary sewer gravity system and force mains will be necessary to collect and transmit the wastewater flow from the proposed development to the SDWWTP. Currently, there is a 30-inch force main abutting the subject application site along SW 177th Avenue (from theoretical SW 64th Street to SW 72nd Street), along SW 72nd Street (from SW 177th Avenue to SW 167th Street), and along SW 167th Avenue (from SW 72nd Street to SW 88 Street). Said force main is transmitting wastewater flow primarily from the Miccosukee Resort and Gaming facility and the Krome Detention Center facility to the SDWWTP for treatment and disposal. In addition, there is a 20-inch force main along SW 88 Street, from SW 167 Avenue to approximately 670 feet west of SW 169th Avenue.

Currently there is a Miami-Dade Water and Sewer Department sewer pump station (30-0223) located within the application area. This pump, as well as a network of sewer force mains located within the application area, direct the sewer flow to pump station 30-0559 or 30-0536 and then to the South District Wastewater Treatment Plant. The aforementioned sanitary sewer pump station as well as the South District Wastewater Treatment Plant are owned and operated by MDWASD;

in addition, they are currently working within the mandated criteria set forth in the New Consent Decree Case: NO. 1:12-cv-24400-FAM, effective Dec 6, 2013. However, the existing pump station (30-0223) does not have sufficient capacity to handle the proposed wastewater flow. Any proposed sewer mains upgrades, upgrades or new sanitary sewer pump stations and sanitary sewer infrastructure require Miami-Dade Water and Sewer Department and DERM review and approval.

At this time, there is an active MDWASD Agreement No. 20564 to the south of SW 88th Street, west of SW 167th Avenue, within the UDB and adjacent to the subject application. Said Agreement is for the BDG Kendall 172 project for the development of 546 apartments, 60,000 retail stores, and 5,000 office buildings. In addition, there are two projects under construction just south of the BDG Kendall 172 project. Said projects are the Altis @ Kendall Commons (Conveyed Agreement No. 21078) and the Kendall Commons development (Conveyed Agreement No. 19054). Agreement No. 21078 is for 321 apartments, and 8,611 retail stores, and Agreement No. 19054 is for 297 single family residences, 470 townhouses, and 19 apartment units.

Fire and Rescue Service

The application site is currently served by Miami-Dade County Fire Rescue Station No. 56 (West Sunset), located at 16250 SW 72 Street (Sunset Drive). This station is equipped with a Rescue, Tanker and Engine and is staffed with seven (7) firefighter/paramedics 24 hours a day, seven days a week.

The Miami-Dade County Fire Rescue Department (MDFR) has indicated that the average travel time to incidents in the vicinity of the application site is approximately six (6) minutes. Performance objectives of national industry standards require the assembly of 15-17 firefighters on-scene within 8 minutes at 90% of all incidents. Travel time to incidents in the vicinity of the application site complies with the performance objective of national industry standards.

Level of Service Standard for Fire Flow and Application Impacts

CDMP Policy WS-2A establishes the County's minimum Level of Service standard for potable water. This CDMP policy requires the County to deliver water at a pressure no less than 20 pounds per square inch (psi) and no greater than 100 psi, unless otherwise approved by the Miami-Dade Fire Rescue Department. A minimum fire flow of 3,000 gallons per minute (gpm) is required for the business and industry, 2,000 gpm for schools and hospitals, and 1,500 gpm for multifamily residential and offices. Presently, there are no fire flow deficiencies in the vicinity of the application site.

The current CDMP land use designation (Agriculture and Institutional, Utilities and Communication) will allow a potential development which will generate a total of 45 annual alarms. The proposed CDMP designation (Green City Miami) will allow a proposed potential development which is anticipated to generate approximately 4,000 annual alarms. Although fire and rescue service in the vicinity of the subject application is currently adequate, the approximate 4,000 annual alarms will severely impact existing fire rescue service. The MDFR identifies that a new fire rescue station will be required to meet the increase fire rescue service demands and requires that a 2-acre parcel be dedicated within the proposed development for construction of a new fire rescue station to serve the proposed development.

Solid Waste

The Miami-Dade County Public Works and Waste Management Department (PWWM) Solid Waste Functions oversees the proper collection and disposal of solid waste generated in the County through direct operations, contractual arrangements, and regulations. In addition, the Department directs the countywide efforts to comply with State regulations concerning recycling, household chemical waste management and the closure and maintenance of solid waste sites no longer in use.

Any development in Miami-Dade County that includes single family residential units will become part of the Waste Collection Service Area (WCSA), which consists of all residents of the Unincorporated Municipal Service Area (UMSA) and eight municipalities.

Level of Service Standard

CDMP Policy SW-2A establishes the adopted Level of Service (LOS) standard for the County's Solid Waste Management System. This CDMP policy requires the County to maintain sufficient waste disposal capacity to accommodate waste flows committed to the System through long-term contracts or interlocal agreements with municipalities and private waste haulers, and anticipated uncommitted waste flows, for a period of five years. The PWWM assesses the solid waste capacity on a system-wide basis since it is not practical or necessary to make determination concerning the adequacy of solid waste disposal capacity relative to individual applications. As of FY 2014-2015, the PWWM is in compliance with the adopted LOS standard.

Application Impacts

The Green City Miami application proposes the development of 1,780 single family attached residential units on the subject property. Any new development in Miami-Dade County that includes single family residential units will become part of the Waste Collection Service Area (WCSA) per County Code Section 15-13, County collection of solid waste. The waste collection and disposal fees will cover all associated costs.

The Green City Miami application proposes the development of 9,621 multi-family residential units along with the development of retail, office, industrial, college(s), elementary middle and high schools, government buildings, technical schools and public services, hotels and two stadiums. The aforementioned uses will likely result in development of commercial establishments per Chapter 15 of the County Code. The PWWM does not actively compete for multi-family or non-residential waste collection service such as commercial, business, office, and industrial services at this time. Waste collection services will most likely be provided by a private waste hauler. No impacts or any associated costs are anticipated as a result of the new land use category designation. PWWM has no objection to the proposed changes.

Parks

The Miami-Dade County Parks, Recreation and Open Space Department has three Park Benefit Districts (PBDs). The subject application is located inside Park Benefit District 2 (PBD2).

Level of Service Standard

CDMP Policy ROS-2A establishes the adopted minimum Level of Service (LOS) standard for the provision of recreation open space in Miami-Dade County. The CDMP policy requires the County to provide a minimum of 2.75 acres of local recreation open space per 1,000 permanent residents in the unincorporated areas of the County and a County-provided, or an annexed or incorporated, local recreation open space of five acres or larger within a three-mile distance from residential

development. The acreage/population measure of the LOS standard is calculated for each Park Benefit District. A Park Benefit District is considered below LOS standard if the projected deficiency of local recreation open space is greater than five acres. Currently, PBD2 has a surplus capacity of 491.32 acres when measured by the County concurrency level-of-services standard for the unincorporated area of 2.75 acres of location recreation open space for 1,000 persons in UMSA. The "County Local Parks" table below lists all the parks within a 3-mile radius of the application site.

County Local Parks Within a 3-Mile Radius of Application Site		
Park Name	Acreage	Classification
Bent Tree Park		
Bird Basin Park	5.68	NEIGHBORHOOD PARK
Bird Lakes Park	9.88	NEIGHBORHOOD PARK
Calusa Club Estates Park	8.86	COMMUNITY PARK
Eden Lakes Park	6.99	NEIGHBORHOOD PARK
Forest Lakes Park	9.64	NEIGHBORHOOD PARK
Hammocks Community Park	5.67	NEIGHBORHOOD PARK
Kendale Lakes Park	21.51	COMMUNITY PARK
Kendale Lakes SP Tax Dist Lot 1	15.53	COMMUNITY PARK
Kendale Lakes SP Tax Dist Lot 38	0.57	MINI-PARK
Kendale Lakes SP Tax Dist Tract	0.44	MINI-PARK
A3a	0.46	MINI-PARK
Kendall Green Park	25.89	NEIGHBORHOOD PARK
Kings Meadow Park	5.44	NEIGHBORHOOD PARK
Lago Mar Park	11.07	NEIGHBORHOOD PARK
Olympic Park	7.08	NEIGHBORHOOD PARK
Sandpiper Park	4.74	NEIGHBORHOOD PARK
Sugarwood Park	7.82	NEIGHBORHOOD PARK
Sun Lakes Park	7.14	NEIGHBORHOOD PARK
Water Oaks Park	5.05	NEIGHBORHOOD PARK
West Kendale Lakes Park	5.03	NEIGHBORHOOD PARK
Westwind Lakes Park	20.75	COMMUNITY PARK
Westwind Lakes SP TX Dist TR A	9.20	NEIGHBORHOOD PARK
Westwind Lakes SP TX Dist TR FP2	2.70	NEIGHBORHOOD PARK
Westwind Lakes SP TX Dist TR G	5.04	NEIGHBORHOOD PARK
Westwind Lakes SP TX Dist TR GP1	5.12	NEIGHBORHOOD PARK
Wild Lime Park	11.81	COMMUNITY PARK

Source: Miami-Dade County Parks, Recreation and Open Space Department, July 2015.

Application Impacts

The potential development under the existing CDMP land use designation has potential population of 535, resulting in 1.47 acres based on the minimum Level of Service standard for the provision of local recreation open space. The potential for residential development under the proposed land use designation is estimated at 1,780 single-family dwelling units and 9,621 multi-family dwelling units with an estimated population of 29,986 resulting in an impact of an additional

82.46 acres of local parkland. This would lower the surplus capacity of park land from 491.32 to 408.86 but remain above the adopted minimum LOS standard for local recreational open space.

Public Schools

Level of Service Standard

The adopted Level of Service (LOS) standard for all public schools in Miami-Dade County is 100% utilization of Florida Inventory of School Houses (FISH) capacity with relocatable classrooms (CDMP Policy EDU-2A). This LOS standard, except for magnet schools, shall be applicable in each public school concurrency service area (CSA), defined as the public school attendance boundary established by Miami-Dade County Public Schools.

A planning level review, which is considered a preliminary school concurrency analysis, was conducted on this application based on the adopted LOS standard, the Interlocal Agreement (ILA) for Public Facility Planning between Miami-Dade County and Miami-Dade County Public Schools, and current available capacity and school attendance boundaries.

Section 7.5 of the ILA provides for “Public Schools Planning Level Review” (Schools Planning Level Review), of CDMP amendments containing residential units. This type of review does not constitute a public school concurrency review and, therefore, no concurrency reservation is required. Section 7.5 further states that “...this section shall not be construed to obligate the County to deny or approve (or to preclude the County from approving or denying) an application.”

Application Impact

This application, if approved, may increase the student population of the schools serving the application site by an additional 3,551 students – this number reflects an impact reduction of 22.36% for charter and magnet schools (schools of choice). Of the 3,551 students, 1,481 will attend elementary schools, 903 will attend middle schools and 1,167 will attend senior high schools. The students will be assigned to those schools identified in the “Concurrency Service Area (CSA) Schools” table below. At this time, the elementary, middle and senior high schools do not have sufficient capacity available to serve the application (there is a shortfall of 840 seats for elementary schools, 73 seats for middle schools and 535 seats for senior high schools). 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.

Section 9 of the ILA discusses implementation of school concurrency, indicating the test for school concurrency is at the time of a final subdivision, site plan or functional equivalent, not at the time of application for land use. Miami-Dade County Public Schools is required to maintain the adopted LOS standard throughout the five-year planning period. In the event that there is not sufficient capacity at the time of final subdivision, site plan or functional equivalent, the ILA and the Educational Element Policy EDU-2C of the CDMP describe a proportionate share mitigation process.

The application provides for 100,000 square feet of elementary, middle and high schools within the proposed development. However, it is undetermined at this time if this would be adequate student seats to adequately address the shortfall. Therefore should the application be approved the mitigation process would be followed.

Concurrency Service Area (CSA) Schools

Facility Name	Net Available Capacity	Seats Required	Seats Taken	LOS Met	Source Type
Christina M. Eve Elementary	-94	1481	0	No	Current CSA
Christina M. Eve Elementary	175	1481	175	No	5 Year Plan
Lamar Louis Curry Middle	-40	903	0	No	Current CSA/5 Year Plan
John A. Ferguson Senior	-323	1167	0	No	Current CSA/5 Year Plan
Adjacent Concurrency Service Area Schools					
Dr. Manuel C. Barreiro Elementary	355	1306	355	No	Adjacent CSA/5 Year Plan
Dante B. Fascell Elementary	62	951	62	No	Adjacent CSA/5 Year Plan
Oliver Hoover Elementary	49	889	49	No	Adjacent CSA/5 Year Plan
Dr. Gilbert L. Porter Elementary	-19	840	0	No	Adjacent CSA/5 Year Plan
Howard D. McMillian Middle	285	903	285	No	Adjacent CSA
Hammocks Middle	228	618	228	No	Adjacent CSA/5 Year Plan
Zelda Glazer Middle	47	390	47	No	Adjacent CSA/5 Year Plan
Howard D. McMillian Middle	270	343	270	No	Adjacent CSA/5 Year Plan
Miami Sunset Senior	488	1167	488	No	Adjacent CSA/5 Year Plan
G. Holmes Braddock Senior	145	679	145	No	Adjacent CSA/5 Year Plan
Felix Varela Senior	-224	534	0	No	Adjacent CSA/5 Year Plan

Source: Miami-Dade County Public Schools, August 2015.

Miami-Dade County Department of Regulatory and Economic Resources, August 2015.

Aviation

Miami-Dade County Aviation Department (MDAD) does not object to the proposed CDMP amendment provided that all uses comply with federal, state and local aviation regulations, including the Code of Miami-Dade County, Chapter 33, as it pertains to airport zoning.

Roadways

The application site is a ±819 gross acres (±797 net acres) site located between theoretical SW 64 Street and SW 88 Street/Kendall Drive and between SW 177 Avenue/Krome Avenue and SW 167 Avenue. The application site lies outside the County's Adopted 2020 Urban Development Boundary (UDB) and within the County's 2030 Urban Expansion Area (UEA).

Access to the application site is provided by SW 167 Avenue on the east, SW 88 Street/Kendall Drive (SR 90) on the south and SW 177 Avenue/Krome Avenue (SR 997) on the west. Currently, SW 167 Avenue is a two-lane undivided roadway, SW 88 Street is a four-lane divided roadway, and Krome Avenue is a two-lane undivided facility. SR 997/Krome Avenue is designated a Strategic Intermodal System (SIS) facility. Both Kendall Drive and Krome Avenue are designated Evacuation Routes. The County's adopted 2016 *Transportation Improvement Program (TIP)* lists Krome Avenue from SW 8 Street to SW 88 Street and from SW 88 Street to SW 136 Street for

capacity improvement--widening from two to four lanes. The widening of the segment from SW 8 Street to SW 88 Street is currently under construction; and the widening of segment from SW 88 Street to SW 136 Street is programmed for construction in FY 2015-2016. SW 88 Street/Kendall Drive from SW 117 Avenue to US 1/South Dixie Highway is a four- and six-lane divided major east-west corridor, which connects to SW 177 Avenue/Krome Avenue on the west and to the HEFT (SR 821), the Don Shula Expressway (SR 874), the Palmetto Expressway (SR 826) and US-1 on the east. SW 177 Avenue, the HEFT, SR 874, SR 826, and US-1 are all major north-south regional corridors that provide access to other areas of the County.

Applicant's Transportation Analysis

The County's *Instructions for Preparing Applications Requesting Amendments to the Miami-Dade County Comprehensive Development Master Plan May 2015-16 Amendment Cycle* report (*Instructions Report*) requires that applicants of any Standard CDMP application to submit a traffic impact analysis (TIA) report in support of the application. The TIA report shall be prepared by a professional engineer registered in the State of Florida and conducted using a professional methodology accepted by the Department. The TIA must include the following: a study area (area of influence); existing roadway conditions; future roadway conditions, a short-term and a long-term traffic level of service analyses; background traffic; list of roadway capacity improvements listed in the adopted 2016 *Transportation Improvement Program (TIP)* and in Priorities I through IV of the adopted 2040 *Long Range Transportation Plan (LRTP)* Cost Feasible Plan; trip generation using the *ITE Trip Generation Handbook*; trip distribution using the *Miami-Dade 2040 Long Range Transportation Plan Directional Distribution Report*. The short-term and long-term traffic level of service analyses should be performed using the most current State and County traffic counts. The future long-term conditions analysis must be performed for the project's buildout year, CDMP long term planning horizon (Year 2030), or the County's LRTP planning horizon (Year 2040). The TIA must also include the need for new/expansion of facilities; a mitigation analysis; and maps/exhibits. (pp. 6 and 7 of the *Instructions Report*).

County Staff of the Regulatory and Economic Resources (RER) Department and Public Works and Waste Management (PWWM) Department met with the traffic consultant, David Plummer and Associates (DPA), on May 5, 2015 and on May 11, 2015 to discuss DPA's proposed transportation methodology for Green City Miami Application. Copies of the transportation methodology and County staff's comments are included in Appendix D. DPA submitted on June 30, 2015 the "Traffic Study Green City Miami Land Use Amendment" report (June 2015) to the Department. A copy of the Traffic Study's Executive Summary is included in Appendix D.

Applicant's Traffic Study

The applicant's transportation consultant, David Plummer and Associates (DPA), prepared the *Traffic Study Green City Miami Land Use Amendment* dated June 2015. The TIA addresses the impacts that the Green City Miami (the project) will have on the roadways adjacent to and in the vicinity of the application site. The proposed project is a mixed-use development intended to serve the western end of Miami-Dade County. The project's boundaries extend from SW 167 Avenue to Krome Avenue (SW 177 Avenue) and from theoretical SW 64 Street to Kendall Drive (SW 88 Street) on the south. The application site is within the County's adopted 2030 Urban Expansion Area (UEA). The Traffic Study used the development program listed below to determine the impact on the existing and future roadway network within the impact area (study area). See Executive Summary p. *iii* and p. 3 of the Introduction Chapter. It should be pointed this development program is slightly different from the development program outlined in the original application filed in May 2015.

<u>Land Use</u>	<u>Intensity</u>
Multifamily Residential	11,401 dwelling units
Retail	1,382,000 sq. ft. of Gross Leasable Area
Office	925,000 sq. ft. of Gross Floor Area
Government Office	150,000 sq. ft. of Gross Floor Area
Industrial	350,000 sq. ft. of Gross Floor Area
School K-12	4,379 students
University	350 students
Hotel	650 rooms
Multi-Modal Facility	TBA

The Traffic Study includes a Short Term (2018) analysis and a Long Term (2040) analysis as required for a Standard amendment application. The short term portion of the study was conducted based on the methodology established by Miami-Dade County currently used for roadway concurrency analysis, and the Future condition was analyzed with and without the project's impacts.

The 2018 Short Term analysis indicates that one roadway segment, SW 104 Street between SW 147 Avenue and SW 157 Avenue, is projected to operate above its adopted LOS standard without the application impact. In addition, the Short Term analysis also identified Miller Drive between SW 147 Avenue and SW 152 Avenue and Kendall Drive between SW 157 Avenue and SW 167 Avenue projected to operate above its adopted LOS standards with the application impacts. The 2040 Long Term analysis identified 14 roadway segments projected to be backlogged for the future traffic conditions; these roadways are projected to operate in violation of their adopted LOS standards prior to project traffic. In addition, the 2040 Long Term analysis identifies 12 roadway segments projected to operate above their adopted LOS standards without the project impact, and six roadways segments projected to operate above their adopted LOS standard with the project impact. See Exhibit 11 of the Traffic Study report. The traffic study concludes that the applicant is committed to contribute its proportionate share for transportation improvements.

County Staff Comments

County staff of the Public Works and Waste Management Department and the Regulatory and Economic Resources Department reviewed the subject TIA report and provides the following comments:

1. The development program considered in the Traffic Study is not the same as the development program provided in the original CDMP application, which is listed in item 12 of the Green City Miami Area section of the Application. The uses proposed in the Green City Miami Application is listed below:

<u>Land Uses</u>	<u>Intensity</u>
Multifamily Residential	9,621
Townhouses	1,780
Retail	1,362,000 sq. ft. of Gross Leasable Area
Office	925,000 sq. ft. of Gross Floor Area
Government/Institutional/Civic	100,000 sq. ft. of Gross Floor Area
Industrial	350,000 sq. ft. of Gross Floor Area
School K-12	100,000 sq. ft.
College	275,000 sq. ft. (500 students)
Two stadiums	10,000 seats (5,000 seats each)
Hotel	630 rooms

Use the development program presented in the application and revise the Traffic Study accordingly.

2. Page 3. Sec. 1.3 Study Area and Methodology. The May 19, 2015 Transportation Methodology for Green City Miami states on page 1 that “the study area for the project is bounded by SW 8th Street (SR 90) to the north, Coral Reef Drive (SW 152 Street) to the south, SW 117 Avenue to the east, and Krome Avenue (SR 997) to the west.” Revise Exhibits 8, 9, 10, and 11 to include SR-821/HEFT, SW 117 Avenue, SW 136 Street, and SW 152 Street accordingly.
3. Existing conditions. DPA stated in their May 19, 2015 Methodology that existing conditions would be provided for the entire study area, instead, DPA provided the existing condition of the roadways closest to the application site, which are required for the concurrency analysis. A table showing the existing the roadway segment, adopted level of service, service volume, peak-period volume, and existing LOS should be provided.
4. Page 5. Sec. 2.1 Planned and Programmed Roadway Improvements. Revise Exhibit 2 to list all roadway capacity improvements within the study area which are programmed for construction in the MPO’s adopted *2016 Transportation Improvement Program* and the planned and fully funded projects listed in Priorities I, II, III and IV of the Cost Feasible Plan of the adopted *2040 Long Range Transportation Plan*.
5. Page 6. 2.2 Background Traffic. The Growth Rate was determined using only historical data for State roadways (Krome Avenue, Kendall Drive and SW 137 Avenue). Revise Appendix C, Background Growth Rate Calculations, to consider the historic counts for County roadways also such as SW 40 Street, SW 56 Street, SW 72 Street, SW 104 Street, SW 120 Street, SW 147 Avenue, and SW 127 Avenue.
6. Page. 6. Sec. 2.3 Project Trip Generation. Trip generation were estimated using the *ITE Trip Generation Manual, 9th edition*. However, the 1,780 townhouse and 9,621 apartments were combined when estimating the trip generation. Compute the trip generation for each residential type separately; for townhouses use ITE Land Use Code 230 and for apartments use ITE Land Use Code 223 for Mid-Rise Apartments.

The trip generation for the project was adjusted to reflect other modes of transportation. The trips were adjusted by deducting 10% for alternate modes of transportation such as walking, biking and mass transit. This assumption was based on the Census data provided by the 2013 American Community Survey. However, the Census information used to support this assumption is a countywide information, which do not reflect the more localized condition for the West Kendall Area. The use of public transportation to work in 2013 was 5.9% countywide (3.1% for the Kendall Area), walking was 2.5% countywide (1.2% for the Kendall Area), and bicycling was 0.7% countywide (0.0% for the Kendall Area). Reduce the percentage for alternate modes of transportation to be representative of the West Kendall area.

Internalization of the Project trips was performed using the ITE methodology. Assumptions were made to adjust unconstrained internal capture rates for uses other than those provided by ITE; however, the assumptions are not substantiated. For example it is assumed that 15% of the trips entering the hotel are from the residential use, and 2% of the trips entering the residential use are from the hotel; increase by 26%, for a total of 35%, of the trips entering the retail use from the residential use to account for community capture; the increase by 33%, for a total of 45%, of the trips exiting the retail use that go to the residential use to account for community capture; the assumption that 5% of the industrial trips will interact with the residential use; the assumption that 75% of the trips entering and exiting the School are from and to the residential use; the assumption that 40% of the households will have children

attending the charter school –Miami-Dade County Public School indicates that 22.36% of the children in Miami-Dade County attend Charter schools or Magnet schools; the assumption that 40% of the trips entering and exiting the university/college are from and to the residential use; the assumption that 10% from the trips exiting the hotel will go to the office use and 10% of the trips exiting the office use will go the hotel use; the assumption that 58% of the trips exiting the hotel go to the retail use and 10% of the trips exiting the retail use go the hotel; the assumption that 34% of the trips entering the hotel are from the retail use and 13% of the trips exiting the retail use go the hotel. County staff also question the assumptions for the interactions between the hotel and industrial use, residential and industrial uses, office and industrial uses, office use and school, office use and university, retail and industrial uses, retail use and school, and retail use and university. Consultant should provide the data or the source(s) used to establish the internal capture rates for these land uses.

In the internalization of the project trips, the consultant included a significant reduction for “community capture”. Consultant argues that community capture is recognized in large development with the intent of creating a community that would make many off-site trips unnecessary by being of sufficient size to provide a balance of land uses. In order to account for community capture, the consultant adjusted the unconstrained internal capture rates to reflect higher interaction between land uses.

Community capture was intended to be applied to projects that were subject to Development of Regional Impact review, large, self-standing, isolated development with a balanced mix of uses. Recent changes to State law regarding new large development that meet the DRI thresholds, are no longer subject to DRI review. Even though the proposed Green City Miami is a large development with a balanced mix of uses it does not meet the criteria of a self-standing, isolated development such a new town; on the contrary, this project if approved, will become a suburb of the larger Miami-Dade County Metropolitan area. County staff have concerns regarding the utilization of “community capture” reduction in the Green City Miami project because this project is not an isolated, self-standing project. Below are the reasons why County staff believe Green City Miami does not qualify for community capture.

- i. The communities referenced in the transportation consultant’s methodology and traffic study such as Babcock Ranch, Ave Maria, etc., are Developments of Regional Impact which are self-standing and significantly isolated from developed areas. As noted in FDOT’s *2014 Transportation Site Impact Handbook*, high trip capture may occur with remote locations that offer a balanced mix of complementary land uses. The Town of Ave Maria is a college town located in the heart of Collier County, approximately 25 miles from the urbanized area; Babcock Ranch, located in Charlotte County, is approximately 20 miles from Port Charlotte; and the Gateway DRI, located in Lee County, is approximately 15 miles from Fort Myers. The Green City Miami project, alternatively, will be located adjacent to an existing developed area with a mix of uses offering ample destinations, including multiple retail uses, restaurants, a hospital, movie theaters, gymnasiums, banks, etc. In addition, Miami-Dade County has plenty of regional parks and entertainment centers, colleges and universities, cultural centers, major shopping centers, and employment centers that are major attractors with competing opportunities for external trips. As noted in the FDOT Handbook, these competing external opportunities would result in a lower internal capture rate for the proposed community. Moreover, no Development of Regional Impact in unincorporated Miami-Dade County has utilized the community capture method because they did not meet the identified community criteria.
- ii. The FDOT’s *Community Capture Methodology* dated February 18, 2009, states that community capture is “an emerging topic” that requires further analysis supported by

substantial and detailed monitoring requirements (p. 1). It also notes that arbitrary community capture caps for new communities should be avoided because each site will have unique characteristics; therefore, minimum or maximum values for community capture are not provided until further experience is gained or research done. Until then, prudent and reasonable analysis will be used and backed up by substantial monitoring programs, with built in adjustments to mitigation requirements.

- iii. FDOT's *2104 Transportation Site Impact Handbook* indicates that "reasonable analysis of proposed developments will be used and will be verified by substantial and on-going monitoring programs." For example, the Babcock Ranch Master Development Order specifies that the true internal capture will be established through the monitoring of the external trips throughout the life of the development. The *Community Capture Methodology* accepted by the FDOT Executive Board noted the importance of having discussions among a myriad of experts during the pre-application and transportation methodology meetings to agree on factors needed to determine the project-specific community capture and external impacts. The normal CDMP amendment process does not usually allow for such detailed discussions.
 - iv. The FDOT Handbook also notes that the importance of income compatibility between the residents of a community and the employment opportunities provided in the community. The applicant has not provided sufficient information to assess the income compatibility of land uses to demonstrate that the future residents of Green City Miami would not need to travel outside the project to find gainful employment.
 - v. Revise Appendix F and Exhibit 4 accordingly.
7. Page 9. Sec. 2.4 Project Trip Assignment. The traffic study states that project traffic assignment was established using the cardinal distribution obtained from the *Miami-Dade County 2040 Long Range Transportation Plan Directional Trip Distribution Report* (October 2014). The subject application is located in TAZs 854 and 855. However, the transportation consultant used TAZs 844 and 845 to assign the trips generated by this application to the surrounding roadway network. Recalculate Exhibit 5, Cardinal distribution, using the appropriate TAZs 854 and 855 information and revise Exhibits 6 and 7 accordingly.
8. Page 13. Future Long Term (2040) Conditions. Revise Exhibit 8, Project Long Term (2040) Trip Distribution, and Exhibit 9, Project Significance Analysis, Exhibit 10, Long Term (2040) Segment Analysis (PM Peak), and Exhibit 11, Long Term (2040) Roadway Improvement, to include the HEFT, SW 117 Avenue, SW 136 Street, and SW 152 Street and address comments 1 through 6 accordingly.
9. Page 16. Exhibit 9. Add the following segments: Coral Way from SW 127 Ave. to SW 117 Ave.; SW 120 Street from SW 127 Ave. to SW 117 Ave.; SW 162 Ave. from SW 42 St. to SW 56 St. and from SW 56 St. to SW 72 St.; SW 157 Ave. from SW 120 Street to SW 136 Street and from SW 136 Street to SW 152 St.; and SW 137 Ave. from SW 136 St. to SW 152 St. In addition, include the following corridors: SW 136 Street from SW 157 Avenue to SW 127 Avenue; SW 152 Street from SW 157 Ave. to the HEFT; the HEFT from SR 836/Dolphin Expressway to SW 152 Street; and SW 117 Avenue from SW 8 Street to SW 152 St.
- Change the Number of Lanes of following roadway segments: SW 8 Street between SW 157 Ave. and SW 147 Ave. to 4LD as segment has a traffic light at SW 152 Ave.; Bird Road between from SW 127 Ave. and SW 117 Ave. to 4LD; Krome Avenue between SW 72 Street and SW 88 Street to 4LD since a new traffic light at SW 72 Street may be warranted; and SW 162 Street from SW 96 Street to SW 99 Street to 4LD.
- Change the LOS Standards of the following roadway segments: Coral Way between SW 147 Ave. and SW 127 Ave. to LOS D; SW 104 Street between SW 167 Ave. and SW 162 Ave. to

LOS E+20%; SW 167 Ave. between SW 88 Street and SW 104 Street to LOS E+20%; SW 162 Ave. between SW 88 Street and SW 96 Street to LOS D; and SW 137 Ave. between NW 12 Street and SW 8 Street, Bird Rd. and Miller Dr., and Miller Dr. and Sunset Dr. to LOS D. Adjust their service volumes accordingly.

Change the service volumes of the following roadway segments: SW 8 Street between SW 157 Ave. and SW 147 Ave. to 3420; SW 137 Ave. between Bird Rd. and Miller Dr. and between Miller Dr. and Sunset Dr. to 4680 and 3780, respectively; SW 137 Ave. between Kendall Dr. and SW 120 Street to 5390.

10. Revise Exhibits 10 and 11 accordingly based on comments 1 through 8.

Staff of the Miami-Dade County Department of Public Work and Waste Management also reviewed the Traffic Study and offered the following comments:

- 1) The provided site plan in Appendix A is missing details. The site plan should be updated with internal roadways network, driveway connections, distribution of land uses such as retails, office, institutional, residences etc.
- 2) 160 acres of parks and green spaces are mentioned on page iii of the study; however, no trip generation was performed for any parks. Please explain and include park and green space in development program.
- 3) The commitment regarding intermodal center is not clear. Page iii states that *“As part of the mitigation plan, the applicant is ready to offer MDC land for the construction of a multi-modal transit center to serve the West End”*. Whereas on page 6 it is stated that *“... In addition, the project has committed to provide an intermodal center to further enhance connectivity within the area and within the project.”* Please explain and verify the status of this commitment.
- 4) Please note that the concurrency data for the traffic count station is not published by PWWM, instead now County’s RER Department is in charge for this task. Please verify details with RER department and update the text in the report accordingly.
- 5) On page 3, please note that besides the first accessed stations additional stations should also be analyzed to provide the status of the traffic conditions in surrounding area.
- 6) For Exhibit 2 on page 5, in addition to tables, maps should be also be added to show the improvements for Miami-Dade MPO for *TIP* and *L RTP* to provide link between information and the locations of the improvements. Also, the priorities/year of completions of the improvements should also be listed in Exhibit 2 on page 5 to give an idea of their availability at different phases of the project.
- 7) Add the following information in Exhibit 3 for all the projects shown on page 7:
 - a. Distances from the major employments or activity center of the larger metropolitan area.
 - b. Maps showing the location of these projects with roadways showing connectivity with their main metropolitan area or activity centers
 - c. Proportions of the mix of at least for following component by gross trips generation;
 - i. Residential
 - ii. Office
 - iii. Retail etc.
- 8) A 10% transit modal split is not acceptable as shown in Exhibit 4 on page 8. Even per the Appendix D information for census data, the total public transport percentage for male and female rider is 5.9%. An analysis of US Census Bureau survey indicated that for census tracts representing the study area (CT165, 179 and 180) indicated that non-auto trips can be estimated around 3%. For any higher non-motorized split further documentation and

commitment for improvement must be provided. Also the pass-by 21% is not acceptable. Per the Traffic Impact Handbook methodology it should be compared with the adjacent roadway traffic such as Kendall Drive, Krome Avenue, SW 167 Avenue for the pass-by traffic. A brief analysis of recent available traffic counts along these roadways indicated significantly lower pass-by trips. Therefore, pass-by must be compared with existing counts along these roadways and analysis must be revised accordingly. A daily trip generation calculation should also be added.

- 9) The percentage of trips along Krome Avenue should be increased in Exhibit 5 on page 10. It is expected that southern trips will use Krome Avenue instead of Kendall Drive. Therefore, the following percentages are proposed for these two roadways. The respective tables should be revised accordingly:
 - a. Kendall Drive- 2529-20.35%
 - b. Krome Avenue-9682-19.2%
 - c. SW 104 Street-9724-9.25%
- 10) On page 14, Appendix for Service volumes is labeled as Appendix H, please correct to denote as "I" as mentioned in the report.
- 11) On page 14 level of service information is mentioned to be presented in Appendix G. Appendix G shows the cardinal distribution information. Please verify and include the level of service information with proper reference in the body of the report.
- 12) On page 15, the widened Krome Avenue may attract higher percentage of trips along Krome Avenue.
- 13) The study area on page 15 must be extended to SW 152 Street in the south and up to HEFT on the east per the study methodology. Currently it is shown up to SW 136 Street and SW 127 Avenue only. Related table and maps should be revised accordingly with more roadways.
- 14) On page 15, the labels for backlogged and above level of service standards have been switched for Exhibit 8.
- 15) For the Exhibit 9 on pages 16 and 17, the following comments are offered:
 - a. The service volumes for Coral Way between SW 157 Avenue and SW 137 Avenue appear too low. Please verify the results and analyses.
 - b. The service volumes for Miller Drive between SW 157 Avenue and SW 127 Avenue appear too low. Please verify the results and analyses.
 - c. Bird Road between SW 127 Avenue and SW 117 Avenue is mentioned to be 2LD please confirm the number of lane in this segment.
 - d. The project assignment percentages do not match for SW 104 Street between SW 167 Avenue and SW 127 Avenue when compared to map in Exhibit 8. The percentages in Exhibit 8 should be followed and respective tables should be revised accordingly.
- 16) On page 22 Exhibit 11 mentions the priorities and expected year of completion of the improvements. The widening of Krome Avenue and SW 104 street are missing in the table; please include these improvements.
- 17) In order to justify a high Internal capture/Community capture the following justification information is required:
 - a. Some sort of survey is required within southern part of the county with similar characteristics to evaluate probable internal capture. It could be an O-D survey by purpose.

- 18) Per the Traffic Impact Hand Book summaries are also needed between different components of the project as it states:

The justification will need to include summaries showing the numbers and percentages of trips served within the proposed development. For example, depending on the development, it could read like this, *"X % of the entering shopping trips expected in the PM peak hour makes up Y% of the total exiting shopping trips from homes within the community."*

- 19) On page 8, discussion is mentioned regarding internal capture for Brickell Key area. This study should be added in the appendix for reference.
- 20) Add in the Appendix the report *"West End Strategy: A Vision for the Future has been published"* by Florida International University (FIU), discussed on page iii.

County Staff's Short-Term Traffic Analysis

County staff performed a short-term concurrency analysis (Year 2018) and analysis of the current traffic conditions, projected to operate with and without the project's impact, as well as the impact of the adjacent proposed project, Amendment 8. These analyses assess the impacts that the application(s) would have on the adjacent roadways and the surrounding roadway network. In accordance with the Instructions Report, the traffic consultant provided the long-term (Year 2030) analysis. Staff also reviewed other considerations, including the widening of SW 177 Avenue/Krome Avenue and access plan, applicant's proposed text for transit hubs, and the proposed trip generation.

Existing Conditions

Traffic conditions are evaluated by the level of service (LOS), which is represented by one of the letters "A" through "F", with A generally representing the most favorable driving conditions and F representing the least favorable. Existing traffic conditions on major roadways adjacent to and in the vicinity of the application site, which are currently monitored by the State and the County, show that these roadway segments are operating at acceptable levels of service. See "Traffic Impact Analysis on Roadways Serving the Amendment Site" table below.

Roadway Capacity Improvement Projects

As mentioned, Krome Avenue/SW 177 Avenue is scheduled to be widened from two to four lanes, the history of which dates back to when the Miami-Dade Board of County Commissioners (BCC) approved and adopted Application No. 16 filed by the Miami-Dade County Department of Planning and Zoning on February 28, 2002, as directed by the BCC in Resolution No. R-199-02 adopted February 26, 2002. The BCC ordered the Department of Planning and Zoning to file the CDMP amendment application in order to improve safety and security in the corridor, which has claimed numerous fatalities in the last decades. As a condition for approval of Application No. 16, the BCC adopted four new policies to the CDMP, Land Use Element Policies LU-3N, LU-3O and LU-3P, and Traffic Circulation Policy TC-4E. LU Policies LU-3N, LU-3O and LU-3P require that: "Any zoning action or amendment to the CDMP that would approve any use other than direct agricultural production, the sale of agricultural produce, and permitted residential and Bed and Breakfast uses of property, in an area designated as Agriculture; or any use other than limestone quarrying, seasonal agriculture or permitted residential use in an area designated Open Land; or any use other than seasonal agricultural use in the Dade-Broward Levee Basin or permitted residential use in an area designated Environmental Protection, on land that is, a) outside the Urban Development Boundary (UDB), and b) within one mile of the right-of-way line of any portions of Krome Avenue designated in the this Plan for improvement to 4-lanes, shall require an affirmative vote of not less than five members of the affected Community Zoning Appeals

Board and two-thirds of the total membership of the Board of County Commissioners in office, where such Community Zoning Appeals Board or Board of County Commissioners issues a decision.”

In addition, Traffic Circulation Subelement TC-4E requires FDOT to prepare and submit, and the Board of County Commissioners to adopt, a detailed binding access control plan for the Krome Avenue corridor. The plan should emphasize access to properties fronting Krome Avenue primarily through alternative street locations.

Trip Generation

One potential development scenario (Scenario 1) for each of the current and requested CDMP land use designation was analyzed for traffic impacts. Under the current CDMP land use designation of “Agriculture” and “Institutions, Utilities and Communications”, the application site is assumed to be developed with its maximum potential development of 163 single-family detached residences. Under the requested CDMP land use designation of “Green City Miami,” the application site is assumed to be developed in accordance with the developer’s development program as follows: 1,780 single-family attached residences, 9,621 multi-family residences, 1,362,000 sq. ft. retail uses, 925,000 sq. ft. office uses, 350,000 sq. ft. industrial uses, college with 500 students, school with 4,379 students, 100,000 sq. ft. civic uses, hotel with 660 rooms, and two stadiums with 5,000 seats each (total of 10,000 seating capacity). Under the current CDMP designation, the residential development would generate approximately 166 PM peak hour trips. If the application were approved and the subject site developed, it would generate approximately 12,670 PM peak hour trips, or 12,504 more PM peak hour trips than the maximum potential development that could occur under the current CDMP land use designation. See “Estimated Peak Hour Trip Generation” table below.

However, the approximately 12,670 PM peak hour trips do not include the applicant’s proposed 100,000 square feet of “civic uses,” as the applicant did not specify which particular type of civic uses—library, post office, fire rescue, police—which is needed in order to accurately estimate trip generation. Reductions for transit usage (3.1%), pass-by trips (18%), and an internalization capture (15%,) results in an approximate 9878 net external PM peak hour trips.

Traffic Concurrency Evaluation

An evaluation of peak-period traffic concurrency conditions as of July 2015, which considers reserved trips from approved development not yet constructed, programmed roadway capacity improvements listed in the first three years of the County’s adopted 2016 *Transportation Improvement Program (TIP)* such as the widening of Krome Avenue, and the PM Peak hour trips estimated to be generated by the application under the requested CDMP LUP map designation, determined that most roadways—adjacent to and in the vicinity of the application site—that were analyzed have available capacity to handle the additional traffic impacts that would be generated by the application and are projected to operate at acceptable levels of service.

However, there is a roadway segment which is projected to fail its adopted LOS standard with the application’s impact--SW 88 Street between SW 167 Avenue to SW 152 Avenue is projected to operate at LOS E+48%, in excess of the adopted E+20% LOS standard. SW 104 Street between SW 157 Avenue and SW 147 Avenue is projected to operate at E+17%, almost at its adopted E+20% LOS standard; and one roadway segment, SW 56 Street between SW 152 Avenue and SW 147 Avenue, is projected to operate at its adopted D LOS standard. See “Traffic Impact Analysis on Roadways Serving the Amendment Site” table below.

Estimated Peak Hour Trip Generation
By Current and Requested CDMP Land Use Designations

Application No. 7	Current CDMP Designation and Assumed Use/ Estimated No. Of Trips	Requested CDMP Designation and Assumed Use/ Estimated No. Of Trips	Estimated Trip Difference Between Current and Requested CDMP Land Use Designation
Scenario 1	<p>“Agriculture” and “Institutions, Utilities and Communication”</p> <p>163 SF detached¹/</p> <p>ITE Code 210</p>	<p>“Green City Miami” ² /</p> <p>1,780 SF attached/ 926 trips</p> <p>9,621 MF/ 3,656 trips</p> <p>1,362,000 sq. ft. retail/ 3,447 trips</p> <p>925,000 sq. ft. office/ 1114 trips</p> <p>350,000 sq. ft. industrial/ 372 trips</p> <p>College, 500 students/ 175 trips</p> <p>School, 4,379 students/ 2540 trips</p> <p>Hotel, 660 rooms/ 403 trips</p> <p>2 Stadiums – each with 5,000 seats/ 37 trips</p>	
Total	166	12,670 ³	+ 12,504

Source: Institute of Transportation Engineers, Trip Generation, 9th Edition, 2012, July 2015.

Notes: ¹ Scenario 1 under the current CDMP land use designation assumes the application site developed with 163 single-family attached residences.

² Scenario 1 under the requested CDMP land use designation of “Green City Miami” assumes the application site developed in accordance with the developer's development program as follows: follows: 1,780 single-family attached residences, 9,621 multi-family residences, 1,362,000 sq. ft. retail uses, 925,000 sq. ft. office uses, 350,000 sq. ft. industrial uses, college with 500 students, school with 4,379 students, hotel with 660 rooms, and two stadiums with 5,000 seats each (total of 10,000 seating capacity).

³Total PM Peak-hour trips. These trips do not consider trip reduction for internalization for mixed uses, pass-by trips for retail and for public transit.

Combined Traffic Concurrency Evaluation for Applications 7 and 8

However, since Application No. 8 to amend the CDMP is located south of the subject application site, a combined traffic concurrency analysis was performed to assess the combined impact of both amendment applications on the adjacent roadway network, including the state roadways SW 88 Street and SW 177 Avenue. The combined analysis shows two (2) roadway segments exceed their adopted LOS standard, namely:

- SW 56 Street/Miller Drive between SW 157 Avenue to SW 147 Avenue is projected to operate at LOS E (D is the adopted LOS standard);
- SW 88 Street/Kendall Drive between SW 167 Avenue and SW 152 Avenue is projected to operate at LOS E+62% (E+20% is the adopted LOS standard).

One roadway segment, SW 104 Street between SW 157 Avenue and SW 147 Avenue, is projected to operate at E+19%, almost at its adopted E+20% standard. See “Combined Traffic Impact Analysis on Roadways Serving Amendments 7 and 8” table below.

Traffic Impact Analysis on Roadways Serving the Amendment Site
Roadway Lanes, Existing and Concurrency PM Peak Period Operating Level of Service (LOS)

Sta. Num.	Roadway	Location/Link	Num. Lanes	Adopted LOS Std. ¹	Peak Hour Cap.	Peak Hour Vol.	Existing LOS	Approved D.O's Trips	Total Trips With D.O's Trips	Conc. LOS w/o Amend.	Amendment Peak Hour Trips	Total Trips With Amend.	Concurrency LOS with Amend.
Scenario 1 "Green City Miami"													
0004	SW 177 Avenue	SW 8 St. to SW 88 St.	2 UD/4 DV*	C	1510/3420	1,001	C/C	0	1,001	C	195	1,196	C
2557	SW 177 Avenue	SW 8 St. to SW 88 St.	2 UD/4 DV*	C	1510/3420	1,386	C/C	0	1,386	C	11	1,397	C
682	SW 177 Avenue	SW 88 St. to SW 184 St.	2 UD/4 DV*	C	1510/3420	1,369	C/C	38	1,407	C	571	1,978	C
9857	SW 157 Ave.	SW 88 St. to SW 112 St.	4 DV	D	3,430	1,638	B	46	1,684	B	958	2,642	C
9112	SW 42 Street	SW 157 Ave. to SW 147 Ave.	4 DV	D	3,370	1,773	B	166	1,939	B	792	2,731	C
9275	SW 56 Street	SW 152 Ave. to SW 147 Ave.	4 DV	D	2,940	1,992	C	98	2,090	C	792	2,882	D
9665	SW 72 Street	SW 162 Ave. to SW 157 Ave.	4 DV	E+20%	3,696	937	C	185	1,122	C	1,472	2,594	D
10	SW 88 Street	SW 177 Ave. to SW 167 Ave.	4 DV	D	3,580	1,105	C	64	1,169	C	583	1,752	C
2529	SW 88 Street	SW 167 Ave. to SW 152 Ave.	6 DV	E+20%	6,468	3,005	C	857	3,862	C	4,136	7,998	E+48%
9724	SW 104 Street	SW 157 Ave. to SW 147 Ave.	4 DV	E+20%	3,720	2,226	C	431	2,657	D	958	3,615	E+17%

Source: Compiled by the Miami-Dade County Department of Regulatory and Economic Resources and Florida Department of Transportation, July 2015.

Notes: DV= Divided Roadway; UD=Undivided Roadway

¹ County adopted roadway level of service standard applicable to the roadway segment: LOS C (80% Capacity); D (90% capacity); E+20% (120% Capacity).

* Roadway is currently a 2 lane undivided, but widening from 2 to 4 lanes is programmed for capacity improvement in the 2016 *Transportation Improvement Program*.

Scenario 1 under the requested CDMP land use designation of "Green City Miami" assumes the application site developed in accordance with the developer's development program as follows: follows: 1,780 single-family attached residences, 9,621 multi-family residences, 1,362,000 sq. ft. retail uses, 925,000 sq. ft. office uses, 350,000 sq. ft. industrial uses, college with 500 students, school with 4,379 students, 100,000 sq. ft. civic uses, hotel with 660 rooms, and two stadiums with 5,000 seats each (total of 10,000 seating capacity).

Combined Traffic Impact Analysis on Roadways Serving Amendments 7 and 8
Roadway Lanes, Existing and Concurrency PM Peak Period Operating Level of Service (LOS)

Sta. Num.	Roadway	Location/Link	Num. Lanes	Adopted LOS Std. ¹	Peak Hour Cap.	Peak Hour Vol.	Existing LOS	Approved D.O's Trips	Total Trips With D.O's Trips	Conc. LOS w/o Amend.	Amend. 7 Peak Hour Trips	Amend. 8 Peak Hour Trips	Total Trips With Amends.	Concurrency LOS with Amends.
0004	SR 997/SW 177 Ave.	SW 8 St. to SW 88 St.	2 UD/4 DV*	C	1510/3420	1,001	C/C	0	1,001	C	195	0	1,196	C
2557	SR 997/SW 177 Ave.	SW 8 St. to SW 88 St.	2 UD/4 DV*	C	1510/3420	1,386	C/C	0	1,386	C	11	12	1,409	C
682	SR 997/SW 177 Ave.	SW 88 St. to SW 184 St.	2 UD/4 DV*	C	1510/3420	1,369	C/C	38	1,407	C	571	41	2,019	C
9857	SW 157 Ave.	SW 88 St. to SW 112 St.	4 DV	D	3,430	1,638	B	46	1,684	B	958	85	2,728	C
9112	SW 42 Street	SW 157 Ave. to SW 147 Ave.	4 DV	D	3370	1,773	B	166	1,939	B	792	108	2,839	C
9275	SW 56 Street	SW 152 Ave. to SW 147 Ave.	4 DV	D	2940	1,992	C	98	2,090	C	792	108	2,990	E
9665	SW 72 Street	SW 162 Ave. to SW 157 Ave.	4 DV	E+20%	3696	937	C	185	1,122	C	1,472	262	2,856	D
10	SR 94/SW 88 St.	SW 177 Ave. to SW 167 Ave.	4 DV	D	3580	1,105	C	64	1,169	C	583	53	1,805	C
2529	SR 94/SW 88 St.	SW 167 Ave. to SW 152 Ave.	6 DV	E+20%	6468	3,005	C	857	3,862	C	4,136	741	8,739	E+62%
9724	SW 104 Street	SW 157 Ave. to SW 147 Ave.	4 DV	E+20%	3720	2,226	C	431	2,657	D	958	85	3,700	E+19%

Source: Compiled by the Miami-Dade County Department of Regulatory and Economic Resources and Florida Department of Transportation, July 2015.

Notes: DV= Divided Roadway; UD=Undivided Roadway

¹ County adopted roadway level of service standard applicable to the roadway segment: LOS C (80% Capacity); D (90% capacity); E+20% (120% Capacity).

* Roadway is currently a 2 lane undivided, but widening from 2 to 4 lanes is programmed for capacity improvement in the 2016 *Transportation Improvement Program*.

Scenario 1 under the requested CDMP land use designation of "Green City Miami" assumes the application site developed in accordance with the developer's development program as follows: follows: 1,780 single-family attached residences, 9,621 multi-family residences, 1,362,000 sq. ft. retail uses, 925,000 sq. ft. office uses, 350,000 sq. ft. industrial uses, college with 500 students, school with 4,379 students, 100,000 sq. ft. civic uses, hotel with 660 rooms, and two stadiums with 5,000 seats each (total of 10,000 seating capacity).

Application Impact

One potential development scenario (Scenario 1) for each of the current and requested CDMP land use designation was analyzed for traffic impacts. Under the current CDMP land use designation of "Agriculture" and "Institutions, Utilities and Communications", the application site is assumed to be developed with its maximum potential development of 163 single-family detached residences. Under the requested CDMP land use designation of "Green City Miami," the application site is assumed to be developed in accordance with the developer's development program as follows: 1,780 single-family attached residences, 9,621 multi-family residences, 1,362,000 sq. ft. retail uses, 925,000 sq. ft. office uses, 350,000 sq. ft. industrial uses, college with 500 students, school with 4,379 students, 100,000 sq. ft. civic uses, hotel with 660 rooms, and two stadiums with 5,000 seats each (total of 10,000 seating capacity). Under the current CDMP designation, the residential development would generate approximately 166 PM peak hour trips. If the application were approved and the subject site developed, it would generate approximately 12,670 PM peak hour trips, or 12,5044 more PM peak hour trips than the maximum potential development that could occur under the current CDMP land use designation. See "Estimated Peak Hour Trip Generation" table below.

County staff will continue to work with the applicant and the transportation consultant to discuss the comments and to address the transportation issues raised above prior to the Board of County Commissioners' transmittal hearing on November 18, 2015

Transit Service

Applicant's Proposed Language for Transit and Transit Hub

There is mention in the applicant's proposed text of providing eligible full-time employees as being eligible for transit stipends, but limited to a five-mile transit distance. In addition, the proposed "Transit" text stipulates that the proposed terminal will provide "premium express bus service" with no mention of local Metrobus service. In the "Metrobus Route Service Summary" table only three of the six routes (Route 204, 272 and 288) within the vicinity of the application site provide express bus service; and Route 204 only provides weekend service to the transit stop located at SW 88 Street and SW 167 Avenue.

Neither the applicant nor the applicant's traffic consultant have met with Miami-Dade County Transit (MDT) to discuss the details or funding mechanism for their proposed Transit Hub. MDT has reviewed the proposed amendment application and submitted documents, and needs the following five (5) items from the applicant in order to provide comments on the proposed Transit Hub: 1) Concept plan; 2) Project Schedule for completion of the Transit Hub; 3) Operations and maintenance plan (Estimated costs and funding mechanism to cover these recurring costs); 4) Draft CDMP covenant which addresses the Transit Hub; and 5) Amendments to the Mass Transit Sub-element of the CDMP to introduce the new Transit Hub. It is requested that the applicant provide MDT with this requested data.

Existing Service

The subject application site lies outside of the UDB and is not directly connected to the existing transit network--existing transit services are located approximately 0.03 to 1.4 miles to the east of the easternmost portion of the application site. The closest transit service is provided by Metrobus Routes 104 and 204 (Killian KAT) along SW 88th Street at SW 167th Avenue. Other Metrobus routes providing transit service further to the east of the application site (SW 88th Street and SW 162nd Avenue) include bus routes 72, 272 (Sunset KAT), 88, and 288 (Kendall Cruiser). The service frequency of these routes are shown in the "Metrobus Route Service Summary" table below.

Metrobus Route Service Summary

Routes	Service Headways (in minutes)					Proximity to Bus Stop (miles)	Proximity to Bus Route (miles)	Type of Service
	Peak (AM/PM)	Off-Peak (middays)	Evenings (after 8 pm)	Saturday	Sunday			
72	60	60	n/a	60	60	1.4	1.4	L
88	20	30	30	30	30	1.4	1.4	L
104	24	45	60	60	60	0.03	0.03	L
204	8.5	n/a	30	n/a	n/a	0.03	0.03	F/E
272	15	n/a	n/a	n/a	n/a	1.4	1.4	F/E
288	12	n/a	n/a	n/a	n/a	1.4	1.4	F/E

Source: Draft 2015 *Transit Development Plan*, Miami-Dade Transit (June 2015 Line Up), July 2015.

Notes: L means Metrobus Local route service; F means Metrobus feeder service to Metrorail; E means Express or Limited-Stop Metrobus service.

Future Conditions

The following transit improvements to the existing Metrobus service, such as the replacement of an existing route with a new enhanced route and route alignment extensions/expansions are planned for the next ten years as noted in the draft 2015 *Transit Development Plan (TDP)*. The table below shows the Metrobus service improvements programmed for the existing routes serving this application area.

As noted in the table below, major projects planned within the general vicinity of the application site over the next 10-years include the Kendall Enhanced Bus Service (EBS) Project which is listed as an unfunded project in the draft 2015 *TDP*. The 2026 and Beyond Vision Plan within the draft 2015 *TDP* contemplates conversion of the Kendall EBS into full bus rapid transit and capacity improvements to the existing West Kendall Transit Terminal located just south of Kendall Drive along SW 162nd Avenue (approximately 1.4 miles to the southeast of the application site). Said transit improvements are currently unfunded and together represent over \$162 million in capital cost funding needs.

Metrobus Recommended Service Improvements and Service Plan

Route	Improvement Description	Implementation Year	Operational Cost	Capital Cost (in 000s)
Route 288 (Kendall Cruiser)	Route to be transformed to Kendall Enhanced Bus (Route eliminated)	2023	-\$1,500	\$0
Kendall Enhanced Bus	New route providing enhanced bus service from the West Kendall Transit Center (Kendall Drive and SW 162 nd Avenue) to the Dadeland North Metrorail Station. Service headways will be 10 minutes during the AM/PM peak-hour using nine (9) 60-foot alternative fuel buses. This route will feature robust stations, queue jump and by-pass lanes, transit signal priority, WiFi and real-time "Next Bus" arrival information via electronic signs at the stations.	2023	\$2,000	\$30,000 (unfunded)
Kendall Corridor (Kendall Bus Rapid Transit - BRT)*	Implement bus rapid transit service on dedicated lanes along SW 88th Street (Kendall Drive) from the West Kendall Transit Center (Kendall Drive and SW 162nd Avenue) to the Dadeland North Metrorail Station.	TBD	\$10,000	\$150,000

West Kendall Transit Terminal Improvements	Improve existing bus hub with 8 bus bays, kiss-and-ride, and expand parking with 500-space structured parking.	TBD	\$37,500	12,500
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Source: Draft 2015 *Transit Development Plan*, Miami-Dade Transit (June 2015 Line Up), July 2015.

* Florida Department of Transportation (FDOT) currently conducting a Project Development and Environment (PD&E) Study.

Note: Based on the CDMP threshold for traffic and/or transit service objectives within a ½ mile distance, the estimated operating and capital costs of implementing this new express bus route are not associated with this application.

Notwithstanding the above noted planned transit improvements, the proposed “Green City Miami” land use category introduces a new regional bus facility with a park-and-ride that will serve as a terminal for premium express bus service within a newly formed Downtown Metropolitan Urban Center. The 854-gross-acre application site currently lies outside of the UDB and is not directly connected to the existing transit network (existing transit services are located approximately 0.03 to 1.4 miles to the east of the easternmost portion of the application site). Introduction of the proposed Green City Miami regional bus facility would necessitate extension of existing Metrobus Routes in order to maximize use of the transit terminal and provide a direct connection between the proposed “Green City Miami” development and the existing transit network. **In the event, this application is approved, detailed site plans as well as a mechanism to provide funding to cover the operations and maintenance costs associated with the proposed Green City Miami regional bus facility must be provided by the applicant for MDT’s review as part of the site plan approval process.** MDT balances its operating budget by adhering to a combination of strategies aimed at producing cost efficiencies; an avoidance of any major service expansion and aggressive use of available local funding sources. The “Annual Cost of Existing Metrobus Route Extensions” table below provides capital costs as well as operations and maintenance cost estimates associated with extension of existing Metrobus routes to the application site.

Annual Cost of Existing Metrobus Route Extensions				
Route	Annual Operations and Maintenance Cost of Route Extensions	Additional Buses Required	Capital Cost of Buses Required*	Additional
Route 72	\$498,800	1		\$450,000
Route 88	\$653,766	3		\$1,350,000
Route 104	\$455,235	1		\$450,000
Route 204	\$1,101,537	3		\$1,350,000
Route 272	\$374,627	1		\$450,000
Route 288	\$568,006	1		\$450,000
TOTAL	\$3,651,971	10		\$4,500,000

Source: Miami-Dade Transit, July 2015

*Cost assumes purchase of 40-foot standard diesel buses.

Future transit improvements along the Kendall Corridor are listed in various county transportation planning documents such as MDT’s draft 2015 *TDP*, the Metropolitan Planning Organization’s (MPO’s) adopted 2015 *Transportation Improvement Program (TIP)* and adopted 2040 *Long Range Transportation Plan (LRTP)*. Future transit improvements along the Kendall Corridor envision the existing West Kendall Transit Terminal located just south of Kendall Drive at SW 162 Avenue as the end-of-the-line station for future EBS and BRT projects. In the event this subject amendment application is approved by the Board of County Commissioners, said plans will require amendments to extend the project limits of both the Kendall EBS and the Kendall Corridor BRT Project further west in order to serve the proposed Green City Miami regional bus facility. Such extensions will result in additional capital and operations and maintenance costs associated with said EBS and BRT projects. Approval of the subject amendment application would require amendments to the Mass Transit Subelement, Future Mass Transit Map Series – Figures 2 and

3 as well as the descriptive text (Pages II-36 and II-37) in order to extend the limits of the Kendall Corridor further west and introduce the proposed Green City Miami regional bus facility as a new Transit Center within the adopted CDMP.

Application Impacts

As mentioned, introduction of the proposed Green City Miami regional bus facility would necessitate extension of existing Metrobus Routes in order to maximize use of the transit terminal and provide a direct connection between the proposed “Green City Miami” development and the existing transit network. The extension of six (6) existing Metrobus routes to serve the proposed Green City Miami regional bus facility result in an additional \$3,651,971 in recurring annual operations and maintenance costs associated with the extension of existing routes. Moreover, the extension of existing Metrobus routes necessitates purchase of additional buses (10 buses total; \$4,500,000) in order to maintain existing service levels and achieve the extension of the routes.

In the event the above noted route extensions do not materialize, a preliminary analysis was performed in the Traffic Analysis Zone (TAZ) where the application was requested. In TAZ 854 and 855 where the subject amendment application is sought, if granted, the expected transit impact produced by this application can be accommodated with the existing transit service levels. However, it should be noted that the majority of existing Metrobus routes are located over one-mile from the application site.

Other Planning Considerations:

The applicant submitted several documents in support of the application, including a report entitled *Green City Miami Land Use Needs Analysis*, dated July 1, 2015 (See Appendix G). Points discussed by the Applicant in this report are identified, by section, and address below.

1.3. Land Use Need

The applicant, in the document *Green City Miami Land Use Needs Analysis*, hereinafter referred to as the Needs Analysis, does not demonstrate that there exists some discreet demand for mixed use development separate from and above the need for residential, commercial and/or industrial development individually. Furthermore, mixed use development, especially development in anticipation of the future extension of public transit, as is the case here, cannot be expected to automatically reduce or eliminate congestion. More likely, in the context of this application, there would be greater local congestion on the collector streets while major arteries may or may not see minor benefits from reverse commuting.

Impact of the Green City Project at Buildout on the Number of Commuters

MSA	Total Population	Employed (16 yrs+)	Ratio: Empl. to Total Pop.	Jobs	Commuters
6.1	189,597	90,789	0.48	25,953	64,836
6.2	153,684	74,458	0.48	36,539	37,919
Total	343,281	165,247	0.48	62,492	102,755
Green City Proposal	29,979	14,431	-	7,600	6,831

Data Sources: Population Data - 2013 American Community Survey 5-year estimates; Jobs Data - InfoUSA 2015.

- First, the successful development of an urban village on the periphery of a greater urban area adds employment and shopper/client trips into the area on top of resident trips out of the area. It is unreasonable to expect that within the greater urban context, a very high proportion of the local residents would be employed in the urban village. This seems especially true when, as is the case here, the job mix and corresponding pay is too low to attract local residents or for new employees from outside the area to afford the new housing. However, even if one assumes that every new Green City job is filled by a new Green City resident, the new population will still generate an additional 6,831 commuting trips as shown in the table above.
- Second, this is exacerbated by the fact that this new development is not being proposed at an existing transportation and/or commercial node, but rather, envisions creating a new node requiring additional transportation connections or expansions.

2.0 Population Projections

Census Estimate

- The applicant, on page 8 of the Needs Analysis, stated that “population projections should be updated in conjunction with each two year UDB amendment cycle, particularly during periods of significant economic transition”

The applicant did not, however provide evidence supporting the hypothesis that revising the County’s methodology for projecting the population will increase accuracy. In the County’s methodology the intent is to provide a reasonable long term projection of the resident population.

In terms of long term projections it is not advisable to “chase” short term fluctuations since doing so could lead to larger error on both the high and low side. High fluctuations on one side or the other in one particular year or short period of time do not necessarily translate into a long-run trend.

In the Needs Analysis the applicant presents an argument that, due to the very high change in population according to Census Estimates between 2010 and 2014, the county’s population projection should be revised upward. However, a review of the annual figures would suggest caution in doing so. The increase in population (July to July) between 2010 and 2011 was 71,227, just to decline steadily to 21,008 in the latest period available, 2013 to 2014.

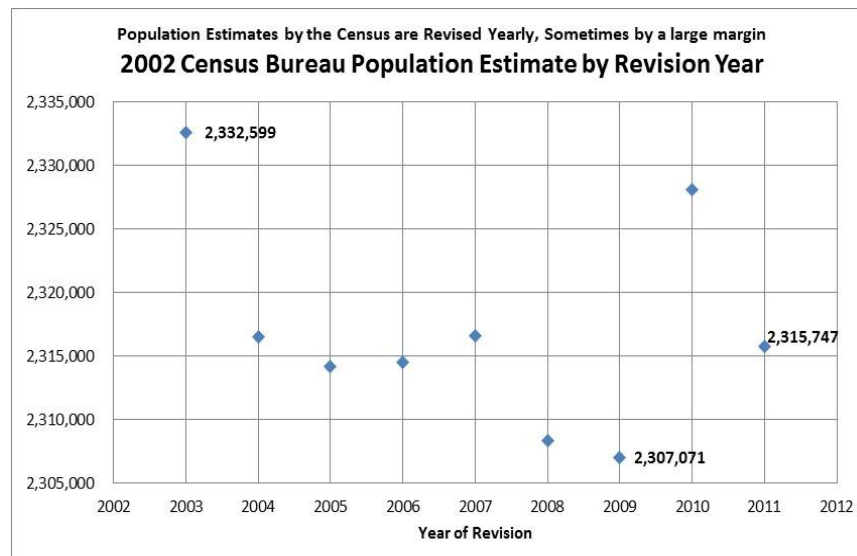
The Bureau of Economic and Business Research (BEBR) is compelled by the legislature to update their population projections annually while Miami-Dade county only updates it after the decennial census figures are released and once or twice in between decennial censuses.

An analysis of the historical “projection error” of BEBR and Miami-Dade County in relation to the latest Decennial Census (2010) figure shows that BEBR updated its population projection 23 times between 1988 and 2010, while Miami-Dade updated its projections only 6 times. Comparing the projected 2010 value prevailing in each annual estimate to the actual 2010 census number, the Miami-Dade County projection was closer in 14 out of the 23 years. The release of the 2010 Census figure revealed that the updates done after the 1990 and 2000 census were beneficial, while in two of the three updates conducted in the inter-census years did not improve outcomes. Likewise BEBR improved

the outcome of their projected 2010 value after both Census' but increased its "projection error" in 9 out of 18 of the inter-census updates it conducted since the 1980 census.

- The applicant states on page 10 of the Needs Analysis that "U.S. Census and BEBR estimates vary significantly between each other, but both are considered acceptable data sets to utilize for the launch year (i.e., most recently available estimate year) for new projections. The County's population projections should be updated based on either the U.S. Census or the BEBR population estimate."

However, only the decennial census figure derives from a complete count of the area's population. It is also the only acceptable benchmark with which to contrast the projected figures. And it is the only figure the County uses as a base for the population projections. The Census Estimate figures are revised every year and can vary significantly. After the 2000 Decennial Census the Census Bureau released a fairly high estimate for the year 2002, and later revised it every year until the last revision that was conducted once the 2010 census results were known. The revisions are depicted in the chart below.



Immigration

- On page 10 of the Needs Analysis in the applicant's Table 2, Column 3, the applicant reports net immigration between the years 2010 and 2014 of 179,828 and states, "On average, the differences between the County's population projections and the current estimates suggest that the County's population projections should be adjusted by an increase of roughly 5,000 persons per year."

The Census Bureau, in its Population Estimates by Components Series, reports net immigration numbers and revises them with every subsequent release. Initial release estimates, without any revisions, would result in total net immigration over the same time period of 148,467. The annual revisions to the estimates are the result of revisions in

immigration figures at the national level that are allocated to counties, not a result of any factors specific to the particular situation in Miami-Dade County.

Another source of immigration data is the Department of Homeland Security's Legal Permanent Resident Status data that is reported for the Miami-Ft Lauderdale MSA. The number of yearly new legal permanent residents has not increased since 2010 relative to earlier years. (Avg. FY2004-2010: 78k, Avg. FY2011-2013: 68k)

- The applicant, on page 11 of the Needs Analysis states that "County staff average the ACS inflow estimate with the lower bound of the "margin of error" calculated by the U.S. Census to account for survey error"

The County's methodology, as stated in the appendix to *Population Projections: Miami-Dade County 2010 to 2030*, contained a scrivener's error. The methodology uses the lower bound reported by the Census in the ACS estimates for immigration. The immigration inflow numbers were adjusted to the lower bound in order to reconcile all of the population components with the historic decennial Census figures. The ACS reports gross immigration and is silent about emigration and therefore this use of the lower bound is both necessary and reasonable.

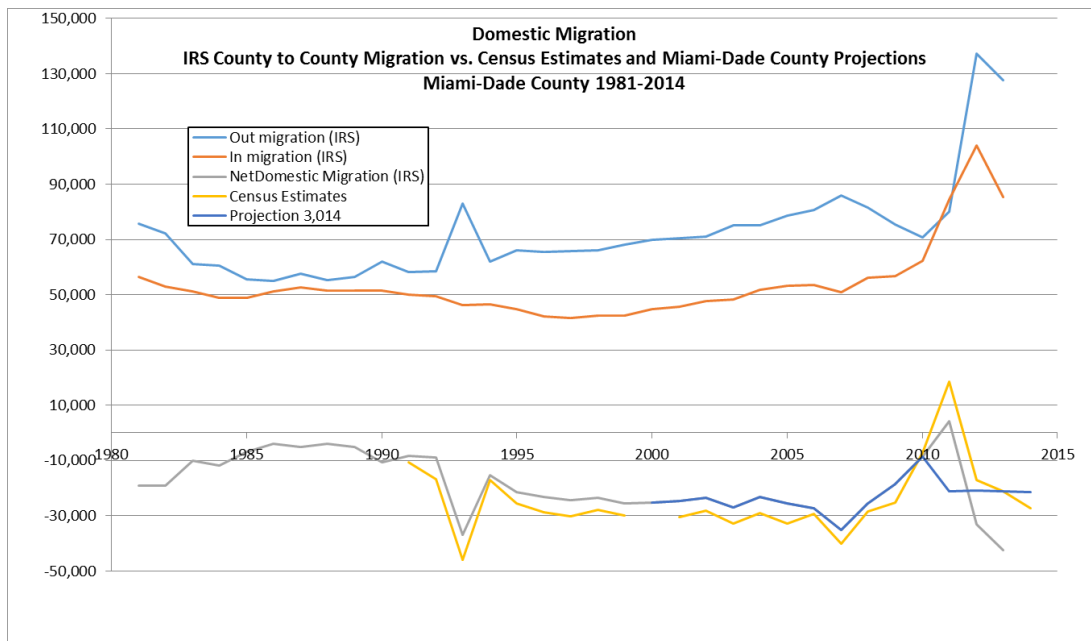
Domestic Migration

- On page 13 of the Needs Analysis The applicant states "County staff essentially viewed the reduction [in the Net Domestic Migration] in 2009-2010 to -8502 as a statistical outlier" . . . "the long term trend has consistently resulted in net outflow until this recent shift in the trend"

The county projects in-and-out migration separately using 1990 to 2010 data (the 2011 IRS files had not been released by the time of the latest update). As part of the methodology the county also moderates the trends by the inclusion of end points in the year 2030. These end points are 63,000 for In Migration and 88,000 for Out Migration. Without the inclusion of endpoints these values would be 64,920 for In Migration and 98,273 for Out Migration with a resulting 2030 total population projection of 2,898,426.

If the 2010 Migration numbers appeared as outliers, the 2011 numbers even more so. The 2011 4,226 net migration figure is the first positive instance in the series that goes back to 1981. On July 29th the IRS released its 2012 series followed by the release of the 2013 series on August 26th. Although it incorporates important methodological changes, the estimate returns to a more historically standard value of -33,177 net migration in 2012 and an even larger net outflow of -42,392 in 2013.

The IRS figure for 2014 is scheduled for release later this year. Nonetheless, the above mentioned Census Estimates by Components also include an estimate of net migration that does include the 2014 value. Similar to the IRS numbers, the Census Estimates figure show net outmigration for all available years, with the exception of 2011 when it shows a net inflow. The very next year the net migration experienced a reversal that wiped out the effect of the year before and in the two following years it returned to the more familiar pattern of net outflow in the 20k range.



A possible explanation for the upward trend in net migration between 2008 and 2011 is the decline in housing prices that attracted people to the county. If this was the reason for that pattern it would have been a temporary phenomenon that should not affect the county's long term projection of population levels. As mentioned before the county looks at long term trends. Even after significant short term shocks that have occurred in the past such as Hurricane Andrew and the Mariel Boat Lift in terms of population and the great recession in terms of employment, once several years have passed (4 to 7) the effects on the long term levels and growth trend are small to null. There might be a significant change in the composition of the totals but not in the overall numbers.

If there was a recent shift in the trend (between 2007 and 2011), the Census Estimates and the latest IRS release would suggest there has been an even more recent shift in the trend that has taken place between 2011 and 2014.

Domestic Migration (inflow minus outflow)		
Year	IRS	Census Estimates "Trend"
2007	-35,038	-40,128
2008	-25,572	-28,399
2009	-18,666	-25,142
2010	-8,502	-7,129
2011	4,226	18,386
2012	-33,177*	-17,037
2013	-42,392*	-21,064
2014	N/A	-27,175

* IRS new methodology

Finally, if we agreed with the applicant that it was advisable to update the projections for every cycle with the latest data available and proceeded to do so after August 26th 2015 the new 2030 projected resident population would, in all likelihood, fall below the 3 million mark.

- The applicant states on pages 15 and 16 of the Needs Analysis that “Table 5 compares BEBR’s 2015 medium range population projections to the County’s population projections, confirming that the BEBR projections are significantly higher than the County projections”

The relevant issue in determining the incremental demand for multifamily residential units (MFRs) is not the level of population, but rather the change in population between 2014 and 2030. Comparing the change in population from the most recent BEBR projections with the population change from the County’s projections for the same time period shows a difference of 48,647 residents. This is much less than the difference between the two in the actual projected 2030 population of 76,049 residents. This distinction is important since using the County-projected change to estimate the additional MFR demand in applicant’s Table 6 would result in demand for 62,064 units, just 7,057 fewer units than using BEBR’s estimates.

In conclusion, and to restate the point made above regarding population projections, the applicant has presented no compelling argument to conclude that 1) the County’s population projections need to be re-estimated, and 2) the County should consider any changes in methodology in developing population projections.

3.0 Urban Development capacity

3.1 Multifamily Development Capacity

The data and analysis presented by the applicant in the Needs Analysis does not demonstrate that there is inadequate capacity of multifamily residential (MFR) housing units.

- The applicant states on page 21 “that the UDB does not currently include sufficient capacity in 2025 for the projected demand of 51,771 multifamily units.” This number, 51,771, represents only the demand for MFR units if the applicant’s proposed adjustments to population projections were accepted. Their own calculation of the supply of MFR units by 2025 is 49,641 MFR units, resulting in a shortage, countywide, of 2,130 MFR units, once, again, only if one accepts the applicant’s proposed population adjustments To put that shortfall in perspective, last July the Board of County Commissioners approved an amendment to the World Center development that, alone, will add an additional 6,000 units to MFR capacity.
- Additionally, the applicant’s analysis excluded residential parcels of 2 acres or less in their methodology to identify a shortfall of MFR units. A quick review of the data shows that there is a total of more than 1,800 acres in such parcels Countywide, with a total capacity of nearly 29,000 housing units.

5.2 [sic] Commercial Development Capacity

- The applicant states on page 25 of the Needs Analysis that “projected [commercial] absorption rates are based on extrapolation of past trends.” This explanation is incomplete

as it fails to acknowledge that projected population projections at the MSA level is an integral component of the analysis.

- The West South Central Half-Tier commercial land use depletion date is 2028. Implicit in this calculation is the assumption that no redevelopment taking advantage of excess commercial capacity occurs in the half-tier prior to the next EAR cycle.
- Commercial acreage, developed and vacant, per thousand of population is a description of the extent of commercial development in this overwhelmingly residential half tier. This ratio is only one metric and should not be used in isolation to indicate whether an area is adequately served by commercial development. A study completed by FIU titled *West End Strategy: A Vision for the Future*, on page 71, hereinafter referred to as the West End Strategy, addresses this issue when it states:

“Even given its high relative household incomes, the West End has an overabundance of retail development, especially considering annual retail spending within the West End compared to the West End’s total Household retail spending capacity.”

- The applicant states on page 27 of the Needs Analysis that “the more intensely developed eastern areas of the county will have substantially greater commercial square footage allocations relative to population as compared to the western half tiers. Therefore, the South Central half tier and MSA 6.1 are in actuality much more significantly underserved than suggested by the acreage to population ratio”. It must be noted that the ratio of commercial land per thousand population is just one metric in evaluating the characteristics of an area. It in no way implies a mandate or deficiency and should not be used in isolation.
- In this context, when the applicant points out on page 25 that “the south central tier has the lowest commercial allocation relative to population demand of the four sectors in both 2020 and 2030.” The applicant -appears to be confusing the existing supply of commercial land with demand even though no analysis of demand has been provided.
- The applicant further states on page 25 that “It is important to recognize that small area population projections are subject to greater projection error. Thus, the disproportionate allocation could potentially be much worse if the South Central Tier experiences greater population growth than projected by staff”. Once again the applicant fails to mention that the “projection error” could be either positive or negative and only considers a negative error. If the error is positive, that is the actual population is less than projected, the commercial allocation would be much better.
- There is an existing 922,151 SF of retail space available in the selected MSAs shown below, 595,250 SF of which is vacant retail space.

Commercial Development

		Land Area (AC)	Building Area (Million SF)	Vacant Space (SF)	Available Space (SF)
Office	MSA 5.4	157.4	1.8	95,301	148,063
	MSA 5.5	461.7	5.0	448,467	509,772
	MSA 5.8	22.9	0.2	6,474	24,565
	MSA 6.1	97.7	1.1	41,913	52,927
	MSA 6.2	305.6	2.5	186,444	225,357
Office Total		1,045.3	10.7	778,599	960,684
Industrial	MSA 5.4	187.1	3.4	33,849	86,032
	MSA 5.5	89.9	1.7	66,998	97,548
	MSA 5.8	16.8	0.2	5,500	13,256
	MSA 6.1	9.7	0.1		
	MSA 6.2	873.3	7.0	213,658	361,390
Industrial Total		1,176.9	12.4	320,005	558,226
Retail	MSA 5.4	1,132.5	5.2	139,078	216,124
	MSA 5.5	663.0	5.6	215,162	296,165
	MSA 5.8	77.2	0.6	16,131	21,369
	MSA 6.1	857.6	5.7	120,125	229,881
	MSA 6.2	826.5	4.7	104,754	158,612
Retail Total		3,556.7	21.9	595,250	922,151

- The applicant cites the FIU study – “West End Strategy” as support for their application. It must be noted that nowhere does that report suggest moving the UDB. Furthermore, it indicates the desired expansion of commercial activity should be concentrated at already existing nodes of activity.

5.2 [sic] Industrial Development Capacity

- The applicant, on page 29 of the Needs Analysis states “as occurs with the commercial allocations, the analysis clearly demonstrates that the South Central Tier and Western half Tier are severely underserved by industrial land use, as also recognized by the FIU study.”

It should be pointed out that the West End Strategy never asserts that the area is underserved by industrial land uses. Rather, it states on page 29 that employment opportunities should be increased in the West End Study Area:

“Develop an Employment Center in the South West End adjacent to Miami Executive Airport. The properties adjacent to Miami Executive Airport are relatively underutilized given its location and ground transportation links. The County has targeted Aviation and Aviation Technology as a key growth industry. Given the region’s shortage of high-end technology manufacturing and development space, and rare condition of proximity to a small airport in a major population and economic center, the airport represents a singular

opportunity to create and diversify the regional employment base.”

- The applicant states on pages 30 and 31 that the depletion year for industrial land is artificially extended by the inclusion in the supply analysis of “marginal sites.” Yet, these sites were not identified by the applicant. In addition, staff does not include undevelopable sites in their analysis. Therefore, all land designated vacant industrial is part of capacity. Deleting these sites -is not justifiable.

Further Relevant Points from FIU’s “West End Strategy”

The *West End Strategy: a Vision for the Future* was an independent study initiated by the FIU College of Architecture at the request of District 11 Commissioner Zapata. It included a diverse group of participants from the University as well stakeholders from the community identified as the West End. The conclusions reached were a product of this workgroup and not of any Miami-Dade County agencies or departments. While the applicant repeatedly cites this study as support for the Green City application (see the references above), a detailed reading of the study shows that the workgroup never recommends the expansion of the Urban Development Boundary. Rather, in the Forward of the study, page 14, it is stated that (Emphasis added):

“The regions continuing development **will be focused inwardly**, requiring different approaches to land use, development density and transportation. The West End may well be a bellwether for these critical development issues shared by other parts of the region and beyond, and hopefully, a model for success and best practices.”

A number of relevant points extracted from the West End Strategy include:

2. Create Immediate Employment and Work Opportunities in the West End

High vacancies in downtown Miami coupled with oversupply of office space means that developing new, traditional office space in the West End is a difficult proposition for the short and mid-term. Solutions will have to look at non-traditional means to provide high-skill, high-wage work opportunities in the short term. Three simple, low-cost strategies could provide significant work opportunities within the West End, requiring much smaller square footage of development than traditional office development. They are:

- Keeping workers who otherwise work outside the West End in the West End for all or part of the work-week through remote, satellite, and shared office spaces;
- Supporting the ability of employees living in the West End to telecommute on an expanded basis; and;
- Supporting the development and creation of new firms and businesses in high-wage, high skill industries and occupations within the West End.
- The high rate of self-employment in the West End, the region’s proportion of small businesses and their important role leading employment growth, the region’s high rate of entrepreneurial activity and new business formation, and the favorable entrepreneurial demographics of the workforce living in the West End, including their maturity, experience, skill level, wages, and education.

- The growing national trend of employers shrinking office space square footage per worker; increasing use of satellite and share office arrangements, and growing demand for telecommuting as an important component of employee compensation;
- Reasonable office rents compared to downtown, Brickell and Wynwood, and the availability of underutilized retail properties for re-purposing and redevelopment, and.

2.1 Initiate Pilot program to re-purpose underutilized properties for redevelopment as co-working shared office and satellite office space to promote its development and expanded use. Capitalizing on the market factors cited above, considerable opportunity exists, at little cost, to provide alternative workspace for existing employers and employees inside the West End. A simple Pilot program could provide incentives, marketing assistance, outreach, and sale of an underutilized property to launch a development of this type. Given the high density of workers can be kept within the West End in a relatively small amount of office space.

3. Leverage Major Assets for New Employment Opportunities

3.1 Support Baptist Health's ongoing service expansion, Healthy Communities effort, and redevelopment of its excess properties for productive, higher density, and employment uses at its Kendall Drive Campus. Proximity to the Hospital and the existing employment base creates a significant opportunity to expand and grow new health service medical technology, and diagnostic businesses.

3.3 Develop an Employment Center in the South West End adjacent to Miami Executive Airport. The properties adjacent to Miami Executive Airport are relatively underutilized given its location and ground transportation links. The County has targeted Aviation and Aviation Technology as a key growth industry. Given the region's shortage of high-end technology manufacturing and development space, and rare condition of proximity to a small airport in a major population and economic center, the airport represents a singular opportunity to create and diversify the regional employment base. Suitable uses could include avionics, aviation components, electronics, communications manufacturing, testing and development and other high-skill industries requiring close access to airports or aircraft. Partnerships will be required to promote immediate redevelopment planning and eventually provide necessary infrastructure improvements.

6. Re-Think New and Future Development Patterns

Given the limited availability of land to significantly expand the road network, changing these land-use patterns may be the single most effective way to 1) reduce traffic congestion and overload of the road network due to work and non-work travel patterns, 2) met the desire of residents to live in a more pedestrian and bike friendly community, and 3) meet the desire of residents to live in a more pedestrian and bike friendly community, and 3) meet resident desires to use local mass transit as a travel alternative. Initiatives to immediately address these issues include:

6.1 Consider higher density and re-zoning for mixed-use development at selected locations in the West End. New development and redevelopment of the central corridors of the West End (SW 88th ST, 137th St., and 157th St.) and new developments of 50 residential units or more should be re-zoned to require and Incentivize a mix of high density residential (70+ units per acre), retail, and employment generating uses. In

addition, the County zoning ordinances for these locations should include and promote work-live space, and enhanced connections to rapid transit including bus, train and dedicated trolleys. Zoning can be structured to rapid transit including bus, train and dedicated trolleys. Zoning can be structured as a mix of requirements and incentives to support new forms of more urbane, walkable, and connected communities. This re-zoning could be accomplished by expanding the Miami-Dade Comprehensive Development Master Plan (CDMP) recommended Regional and Metropolitan Centers to include Urban Corridors that link the North, Central and South West End.

6.2 Re-Zone and re-plan for New Town Centers. Residents also expressed a strong desire for new cultural, retail, and entertainment options within the West End, accessible with ease³ and/or without a car. Two of the West End's largest developable properties – The Palms at Town and Country (at Kendall Drive and the Turnpike), and the Howard Hughes Corporation Kendall Town Center (at Kendall Drive and 162nd Avenue) – have been designated under the CDMP for large urban center development treatment. The County is engaged in a planning process with the owners, and both properties are ideally situated to serve as Town Centers incorporating new residential, retail, employment and entertainment uses for the entire West End. Proper development of these two properties could significantly further many of the development goals of this Report – reducing work related commuter vehicle trips out of the West End, non-work trips, and provide new lifestyle amenities. Their development should be supported and incentivized due to their potential benefits to the Community.

- Miami's office market was overbuilt relative to the number of office workers in the regional economy, and construction of new office space continued unabated through 2010, two years after the recession took hold. The subsequent employment crash left a large oversupply of office space throughout the County, which lingers today. However, even as total employment in the County increases, the number of office workers as a percentage of the total employment base is growing slower than it was prior to the recession. Although the region has had large growth in legal employment, more jobs are being created in occupations that do not require office space.
- Across the US, employers are aggressively shrinking the amount of square footage per employee. According to the CoreNet Global Corporate Real Estate 2020 survey, square feet in 2010 to 176 in 2012, and is projected to reach 151 or less in 2017.

According to Deutsche Bank, the growing shift to online shopping has significant real estate implications. The amount of e-commerce retail sales in 2012 (\$157 B) would equal between 350 million and 500 million square feet of leased retail space based on sales volumes, about a third of the vacant retail space in US shopping centers and retail districts. Deutsche Bank's research has (changed from AHS in document) also noted that E-commerce is diverting a growing percentage of shoppers and the industry away from bricks-and-mortar sales locations and development. The effects on the retail market include:

- Fewer and smaller Stores: chains are rapidly closing significant portions of their physical store locations, including Abercrombie & Fitch, the Gap, Best Buy, and Radio Shack. Commodity retailers, especially big-boxes, are closing stores, and shrinking

new ones. In some cases from 100,000 square feet to 50,000 and 40,000 square feet stores.

- Using an “Urban Strategy – moving stores closer to urban consumers, with smaller footprints, Wal-Mart, Target, Office Depot, Office Max and Staples are all developing stores ranging from 23,000 to 15,000 square feet.
- Multi-Brand Stores, brining multiple brands under one roof. The Gap and Toys R Us are placing multiple brand flags in the same store. Other retailers are co-locating within another retailer’s store.

The Miami Market is seeing each of these trends play out, with chain retailers developing stores in highly urban locations, on smaller footprints, and in interesting vertical mixed-use configurations.

Appendix

- The applicant states on page 5 of 8 of the Appendix of the Needs Analysis that “The County population growth at the Census Tract level and then aggregates those projections to the MSA, Half Tier and Tier levels. Given the volatility of immigration and domestic migration rates, population projections at the Census Tract level are unreliable as a basis for making the fine grain allocations required to forecast depletion years.”
The methodology as described by the applicant is incorrect. The County does not produce population projections at the Census Tract level, nor does the county rely on a methodology that projects at the Census Tract and then aggregates to the larger MSA areas.

At the MSA level the projections are not done using the components method. The immigration and domestic migration patterns only enter the equation indirectly given that the countywide population projections provide the control totals for the sum of the 32 MSAs.

Whether there is volatility in migration patterns or not is not a major issue when preparing long term population projections. The concern is not so much with the year to year changes, nor where the changes come from, but with projecting the average level of growth over long periods of time. Ultimately this is what matters when trying to forecast depletion in the MSAs.

Given that the population projections at the MSA level are constrained by existing capacity under current zoning and development rights, changes in zoning could have a measurable impact in the growth of different MSAs.

- The applicant further states on page 6 of 8 of the Appendix “...This approach though inherently disfavors areas that have previously experienced low growth rates for reasons that may no longer apply and conversely favor higher growth area for reasons that may no longer apply or that should not be favored based on changes in policy. Projection techniques should not be applied in isolation from policy considerations, but rather policy considerations should be considered in determining methodologies that will appropriately implement policy.”

Policies such as adopted zoning and land use regulations are certainly a factor in the county's MSA population projections. Policy enters the projections through the computation of capacity that is directly tied to current land use designations and zoning laws. Due to the importance of policy-derived capacity restrictions placed on MSA projections, it is possible that an area with historically high levels of growth experience a future slowdown.

Economic Impact

Staff used the REMI Model to estimate the economic impact of the project using the proposed project parameters, and the results are summarized in the following table. Staff estimated that the impact of the proposed project on total employment would range from 4,063 to 12,489; the impact on total wages would range from \$265 to \$681 million; and the impact on total output would range from \$594 to \$1,658 million. The ranges are determined by the degree of competition and substitution in the marketplace. The applicant's estimates were 12,922 on total employment, \$707 million on total wages, and \$1,588 million on total output, which were slightly above, or fell at the high end of the range on these three economic indicators.

Economic Indicators	Minimum Impact	Maximum Impact	Applicant's Estimates
<i>Total Employment (Individuals)</i>	4,063	12,489	12,922
<i>Total Wages (2015 dollars)</i>	\$265 million	\$681 million	\$707 million
<i>Total Output (2015 dollars)</i>	\$594 million	\$1,658 million	\$1,588 million

Fiscal Impact

Staff used the economic impacts estimated by REMI, financial data for the county from the County's Comprehensive Annual Financial Report (CAFR), and current population estimate to develop revenue and expenditure coefficients for the County's budget. Applying the applicant's project parameters, the fiscal impact was estimated to fall between \$7.9 to \$8.2 million. The applicant's estimate was between \$7.7 to \$13.2 million.

Urban Sprawl

Urban Sprawl

The Miami-Dade County Strategic Plan and the CDMP call for the promotion of urban infill and redevelopment while discouraging urban sprawl. In addition, Chapter 163.3177(6)9, Florida Statutes (F.S.), requires Future Land Use Elements and Future Land Use Element amendments to discourage urban sprawl. The statute provides 13 indicators that a plan or plan amendment does not discourage the proliferation of urban sprawl and 8 indicators that a plan or plan amendment discourages the proliferation of urban sprawl. The Statute further provides that a Future Land Use Element or plan amendment shall be deemed to discourage the proliferation of urban sprawl if it incorporates a development pattern or urban form that achieves 4 or more of the following 8 indicators for the discouragement of urban sprawl:

Staff's review provided below identifies that the application meets 2 indicators for the discouragement of urban sprawl and 5 indicators for the encouragement of urban sprawl. Pursuant to Chapter 163.3177(6)9, F.S., the proposed amendment does not discourage urban sprawl, but instead, would encourage the proliferation of urban sprawl if approved. Therefore, approval of the application would be in contravention of the statutory requirement to discourage urban sprawl.

The application meets 2 of the indicators that demonstrate the plan amendment discourages the proliferation of urban sprawl, each indicator is numerically listed below and is followed by an analysis of whether or not the application meets the intent of the indicator:

1. Directs or locates economic growth and associated land development to geographic areas of the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems.
 - a. *This indicator is not met.* The application proposes a mixed use transit oriented development on a ±819-acre site that is located adjacent to the County's West Wellfield and within the for the wellfield's protection area. The west wellfield is a significant source of potable water for Miami-Dade County. The application proposes development that would exceed the maximum sewage loading thresholds for the wellfield and proposes uses within protection area that generally handle or generate hazardous materials and waste which is prohibited in the Wellfield Protection Area. The proposed development therefore could adversely impact the wellfield and its long term viability as discussed in Principal Reason No. 9 on page 7-7 herein.
2. Promotes the efficient and cost-effective provision or extension of public infrastructure and services.
 - a. *This indicator is not met.* The application promotes a mixed use and transit oriented development with provisions for a transit center within the proposed development and provides for energy and water conservation in the proposed Green City Miami land use category text. However, the application does not appropriately and adequately address the coordination of transportation facilities and services to the site. Several studies conducted for the Kendall area have identified the need for improved transit service to counter traffic congestion in the area including the *2002 Kendall Mobility Enhancement Study*, the *2007 Kendall Link study*, and the *2009 CSX Corridor Evaluation Study*.

The Miami-Dade Transit has identified improvements to its current service facilities for implementation in year 2023 to the tune of \$162 million in unfunded capital costs (see Transit Service analysis on page 7-59). The application does not address these transit improvements but instead identifies the State Road 836 (Dolphin Expressway) extension to SW 136 Street aligned along Krome Avenue and the connection of two CSX railroad corridors as part of a possible regional transit system that would serve the current Kendall population and the residents of the proposed Green City development. However, the State Road 836 extension and the connection of the two CSX railroad corridors are not included in the CDMP and are therefore inconsistent with the CDMP (see Principal Reason No. 7 herein on page 7-6).
3. Promotes walkable and connected communities and provides for compact development and a mix of uses at densities and intensities that will support a range of housing choices and a multimodal transportation system, including pedestrian, bicycle, and transit, if available.

- a. *This indicator is not met:* The application promotes a compact, mixed use and transit oriented development with pedestrian and bike facilities and provisions for a transit center within the proposed development and provides for energy and water conservation within the development. However, the provision of a multimodal transportation system including transit is not adequately addressed as discussed in Indicator No. 2 above.
4. Promotes conservation of water and energy.
 - a. *This indicator is not met:* The application provides for energy and water conservation in the proposed Green City Miami land use category text, but, the impacts to the adjacent Kendall Drive discussed in Indicator No. 2 above, would increase energy consumption due to traffic congestion. Additionally, as discussed in Indicator No. 1 above, the County's West Wellfield could be adversely impacted by the maximum development proposed in the application.
5. Preserves agricultural areas and activities, including silviculture, and dormant, unique, and prime farmlands and soils.
 - a. *This indicator is not met:* The proposed development is within an existing agricultural area, notwithstanding being within the Urban Expansion Area where urban development beyond the current Urban Development Boundary may be warranted at some time in the future. Additionally, the Green City Miami category text in subparagraph No. 4, Agriculture, would require "...replacing existing inefficient row crop harvesting with more productive hydroponic farming" without providing adequate data and analysis demonstrating that hydroponic farming is as productive or more productive than row crop farming. Furthermore, the applicant has not demonstrated that the proposed hydroponic farming is economically viable in consistent with Policy LU-1P, which provides that the county is to protect and promote agriculture as viable economic activity.
6. Preserves open space and natural lands and provides for public open space and recreation needs.
 - a. *This indicator is met:* The Green City Miami Land Use category proposed in the application provides for open space, recreational needs and the protection of natural lands that are to be preserved pursuant to the Miami-Dade County Code.
7. Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area.
 - a. *This indicator is not met:* The Application proposes the development of 11,401 residential units 1.3 million sq. ft. of retail and 350,000 sq. ft. of industrial among other uses, and estimates that 7,600 jobs would be created within the proposed Green City Miami development. However, the maximum 11,401 residential units would generate a projected population of 29,979 persons of which an estimated 14,431 persons would be added to the Kendall area labor force (see Other Planning Considerations on page 7-62). Assuming all jobs created were filled by the residents of the proposed development, there would be a shortfall of 6,831 jobs for the residents of the proposed development.
8. Provides uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the vicinity that constitutes sprawl or if it provides for an innovative development pattern such as transit-oriented developments or new towns as defined in Section 163.3164 F.S.

- a. *This indicator is met:* Section 163.3164(46), Florida Statutes defines transit-oriented developments as follows:

“Transit-oriented development” means 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 designated 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 application meets 5 of the indicators that demonstrate the plan amendment does not discourage the proliferation of urban sprawl. Each indicator is numerically listed below and, for the applicable indicator, is followed by a discussion of how the application meets indicator:

1. Promotes, allows, or designates significant amounts of urban development to occur in rural areas at substantial distances from existing urban areas while not using undeveloped lands that are available and suitable for development.
 - a. The application site is adjacent to existing urban development to the east, in an Urban Expansion Area where urban development may be warranted at some time in the future, and outside of the 2020 Urban Development Boundary (UDB) where urban development is to occur. As indicated in the Supply and Demand Analysis herein on page 7-30 and discussed in Principal Reason No. 1 on page 7-2, there is sufficient residential, commercial, and industrial land within the UDB to sustain population and economic growth to the year 2030 and beyond.
2. Fails to adequately protect and conserve natural resources, such as wetlands, floodplains, native vegetation, environmentally sensitive areas, natural groundwater aquifer recharge areas, lakes, rivers, shorelines, beaches, bays, estuarine systems, and other significant natural systems.
 - a. The application proposes development on a ±819-acre site that is located adjacent to the County's West Wellfield and within the for the wellfield's protection area. The west wellfield is a significant source of potable water for Miami-Dade County. The application proposes development that would exceed the maximum sewage loading thresholds for the wellfield and proposes uses within protection area that generally handle or generate hazardous materials and waste which is prohibited in the Wellfield Protection Area. The proposed development therefore could adversely impact the wellfield and its long term viability as discussed in Principal Reason No. 9 on page 7-7 herein.
3. Promotes, allows, or designates urban development in radial, strip, isolated, or ribbon patterns generally emanating from existing urban developments.
4. Fails to provide a clear separation between rural and urban uses.
5. Discourages or inhibits infill development or the redevelopment of existing neighborhoods and communities.
 - a. *This indicator is met:* The application seeks expansion of the UDB to allow for urban development on the application site when adequate land is within the UDB to facilitate the County's projected growth and development to the year 2030 and beyond. Additionally, the application proposes changes to the CDMP Land Use Element Policy LU-8F that would require the UDB to contain a 20-year supply of residential land and

to allow for biennial UDB amendments to expand the UDB to maintain the proposed 20-year residential land supply, which would make more vacant undeveloped land available and thereby discouraging infill and redevelopment within the existing urbanized area.

6. Fails to encourage a functional mix of uses.
7. Results in poor accessibility among linked or related land uses.
8. Results in the loss of significant amounts of functional open space.
9. Promotes, allows, or designates for development substantial areas of the jurisdiction to develop as low-intensity, low-density, or single-use development or uses.
10. Fails to adequately protect adjacent agricultural areas and activities, including silviculture, active agricultural and silvicultural activities, passive agricultural activities, and dormant, unique, and prime farmlands and soils.
11. Fails to maximize use of existing public facilities and services.

- b. *This indicator is met:* The application promotes a mixed use and transit oriented development with provisions for a transit center. However, the application does not appropriately and adequately address the coordination of transportation facilities and services to the site. Several studies conducted for the Kendall area have identified the need for improved transit service to counter traffic congestion in the area including the *2002 Kendall Mobility Enhancement Study*, the 2007 Kendall Link study, and the *2009 CSX Corridor Evaluation Study*.

The Miami-Dade Transit has identified improvements to its current service facilities for implementation in year 2023 to the tune of \$162 million in unfunded capital costs (see Transit Service analysis on page 7-59). The application does not address these transit improvements but instead identifies the State Road 836 (Dolphin Expressway) extension to SW 136 Street aligned along Krome Avenue and the connection of two CSX railroad corridors as part of a possible regional transit system that would serve the current Kendall population and the residents of the proposed Green City development. However, the State Road 836 extension and the connection of the two CSX railroad corridors are not included in the CDMP and are therefore inconsistent with the CDMP (see Principal Reason No. 7 herein on page 7-6).

12. Fails to maximize use of future public facilities and services.
13. Allows for land use patterns or timing which disproportionately increase the cost in time, money, and energy of providing and maintaining facilities and services, including roads, potable water, sanitary sewer, stormwater management, law enforcement, education, health care, fire and emergency response, and general government.
 - a. *This indicator is met:* The application provides for energy and water conservation in the proposed Green City Miami land use category text, but, the traffic impacts to the adjacent Kendall Drive would increase energy consumption due to traffic congestion. The application does not identify or address the projected traffic impacts to the roadway. Additionally, as discussed above, the County's West Wellfield could be adversely impacted by the maximum development proposed in the application. The proposed maximum development would significantly exceed the sewage loading thresholds for the wellfield and includes uses that would handle and/or generate hazardous wastes, which is prohibited in the wellfield.

Consistency Review with CDMP Goals, Objectives, Policies, Concepts and Guidelines

The proposed application would impede the following goals, objectives, policies, concepts and guidelines of the CDMP:

- | | |
|--------|---|
| Goal | Provide the best possible distribution of land use and services to meet the physical, social, cultural, health and economic needs of the present and future populations in a timely and efficient manner that will maintain or improve the quality of the natural and man-made environment and amenities, and preserve Miami-Dade County's unique agricultural lands. |
| LU-1 | The location and configuration of Miami-Dade County's urban growth through the year 2030 shall emphasize concentration and intensification of development around centers of activity, development of well designed communities containing a variety of uses, housing types and public services, renewal and rehabilitation of blighted areas, and contiguous urban expansion when warranted, rather than sprawl. |
| LU-1A. | High intensity, well-designed urban centers shall be facilitated by Miami-Dade County at locations having high countywide multimodal accessibility. |
| LU-1I. | The County shall consider urban design, water and energy conservation and wildlife habitat when designing sites and selecting landscape material for all public projects. |
| LU-1R. | Miami-Dade County shall take steps to reserve the amount of land necessary to maintain an economically viable agricultural industry. Miami-Dade County shall adopt and develop a transfer of developments rights (TDR) program to preserve agricultural land that will be supplemented by a purchase of development rights program to preserve agricultural land and environmentally sensitive property. The density cap of the land use category in the receiving area established by the TDR program may be exceeded. Land development regulations shall be developed to determine the extent that the density cap may be exceeded based on parcel size but in no case shall it exceed 20 percent. |
| LU-2A. | All development orders authorizing new, or significant expansion of existing, urban land uses shall be contingent upon the provision of services at or above the Level of Service (LOS) standards specified in the Capital Improvements Element (CIE), May 2013 Cycle 1-44 Application No. 1 except as otherwise provided in the "Concurrency Management Program" section of the CIE. |
| LU-2B. | Priority in the provision of services and facilities and the allocation of financial resources for services and facilities in Miami-Dade County shall be given first to serve the area within the Urban Infill Area and Transportation Concurrency Exception Areas. Second priority shall be given to serve the area between the Urban Infill Area and the Urban Development Boundary. And third priority shall support the staged development of the Urban Expansion Area (UEA). Urban services and facilities which support or encourage urban development in Agriculture and Open Land areas shall be avoided, except for those improvements necessary to protect public health and safety and which service the localized |

needs of these non-urban areas. Areas designated Environmental Protection shall be particularly avoided.

- LU-3B. All significant natural resources and systems shall be protected from incompatible land use including Biscayne Bay, future coastal and inland wetlands, future potable water-supply wellfield areas identified in the Land Use Element or in adopted wellfield protection plans, and forested portions of Environmentally Sensitive Natural Forest Communities as identified in the Natural Forest Inventory, as may be amended from time to time.
- LU-4A. When evaluating compatibility among proximate land uses, the County shall consider such factors as noise, lighting, shadows, glare, vibration, odor, runoff, access, traffic, parking, height, bulk, scale of architectural elements, landscaping, hours of operation, buffering, and safety, as applicable.
- LU-4B. Uses designated on the LUP map and interpretive text, which generate or cause to generate significant noise, dust, odor, vibration, or truck or rail traffic shall be protected from damaging encroachment by future approval of new incompatible uses such as residential uses.
- LU-8D. The maintenance of internal consistency among all Elements of the CDMP shall be a prime consideration in evaluating all requests for amendment to any Element of the Plan. Among other considerations, the LUP map shall not be amended to provide for additional urban expansion unless traffic circulation, mass transit, water, sewer, solid waste, drainage and park and recreation facilities necessary to serve the area are included in the plan and the associated funding programs are demonstrated to be viable.
- LU-8F. The Urban Development Boundary (UDB) should contain developable land having capacity to sustain projected countywide residential demand for a period of 10 years after adoption of the most recent Evaluation and Appraisal Report (EAR) plus a 5- year surplus (a total 15-year Countywide supply beyond the date of EAR adoption). The estimation of this capacity shall include the capacity to develop and redevelop around transit stations at the densities recommended in policy LU-7F. The adequacy of non-residential land supplies shall be determined on the basis of land supplies in subareas of the County appropriate to the type of use, as well as the Countywide supply within the UDB. The adequacy of land supplies for neighborhood- and community-oriented business and office uses shall be determined on the basis of localized subarea geography such as Census Tracts, Minor Statistical Areas (MSAs) and combinations thereof. Tiers, Half-Tiers and combinations thereof shall be considered along with the Countywide supply when evaluating the adequacy of land supplies for regional commercial and industrial activities.
- LU-8G. When considering land areas to add to the UDB, after demonstrating that a need exists, in accordance with foregoing Policy LU-8F:
- i) The following areas shall not be considered:
 - a) The Northwest Wellfield Protection Area located west of the Turnpike Extension between Okeechobee Road and NW 25 Street and the West May 2013 Cycle 1-45 Application No. 1

- Wellfield Protection Area west of SW 157 Avenue between SW 8 Street and SW 42 Street;
 - b) Water Conservation Areas, Biscayne Aquifer Recharge Areas, and Everglades Buffer Areas designated by the South Florida Water Management District;
 - c) The Redland area south of Eureka Drive; and
- ii) The following areas shall be avoided:
 - a) Future Wetlands delineated in the Conservation and Land Use Element;
 - b) Land designated Agriculture on the Land Use Plan map;
 - c) Category 1 hurricane evacuation areas east of the Atlantic Coastal Ridge;
 - d) Comprehensive Everglades Restoration Plan project footprints delineated in Tentatively Selected Plans and/or Project Implementation Reports; and
- iii) The following areas shall be given priority for inclusion, subject to conformance with Policy LU-8F and the foregoing provision of this policy:
 - a) Land within Planning Analysis Tiers having the earliest projected supply depletion year;
 - b) Land contiguous to the UDB;
 - c) Locations within one mile of a planned urban center or extraordinary transit service; and
 - d) Locations having projected surplus service capacity where necessary facilities and services can be readily extended.
- iv) Notwithstanding Policy LU-8G (iii), other land may be included to expand an existing unique regional facility, defined as an existing public facility or attraction of regional prominence that has been constructed on publicly owned land with significant public funding and intergovernmental coordination, if it satisfies all of the following criteria:
 - a) The land is within the UEA, is contiguous to the UDB, and is contiguous to a unique regional facility;
 - b) The use of the land will be limited to the expansion of the unique regional facility, together with ancillary uses; and
 - c) The expansion will have a positive economic impact, including increased economic development and tourism.

LU-8H. Applications requesting expansion of the UDB shall be in accordance with the foregoing Policies LU-8F and LU-8G, and must meet the following criteria to be considered for approval:

- a) Residential development proposals shall provide for the non-residential needs of the future residents of such proposed developments including but not limited to places of employment, shopping, schools, recreational and other public facilities, and shall demonstrate that such needs are addressed;

- b) Residential development shall be at an average minimum density of ten (10) dwelling units per gross acre;
- c) Residential development must participate in the Purchase of Development Rights, Transfer of Development Rights (TDR) or other County established I-18 program(s) geared to protecting agricultural lands and/or environmentally sensitive lands;
- d) Non-residential development, excluding public facilities, shall be developed at a minimum intensity of 0.25 FAR; and
- e) The proposed development shall be planned to provide adequate buffering to adjacent agricultural lands and shall incorporate and promote bicycle and pedestrian accessibility throughout the development.
- f) The proposed development must be demonstrated not to discourage or inhibit infill and redevelopment efforts within the UDB;
- g) The proposed development will not leave intervening parcels of property between the proposed development and any portion of the UDB; and
- h) It must be demonstrated that the proposed development will have a positive net fiscal impact to Miami-Dade County.

LU-9B. Miami-Dade County shall continue to maintain, and enhance as necessary, regulations consistent with the CDMP which govern the use and development of land and which, as a minimum, regulate:

- i) Land use consistent with the CDMP Land Use Element and CDMP Level of Service Standards;
- ii) Subdivision of land;
- iii) Protection of potable water wellfields; May 2013 Cycle 1-46 Application No. 1
- iv) Areas subject to seasonal or periodic flooding;
- v) Stormwater management;
- vi) Protection of environmentally sensitive lands;
- vii) Signage; and
- viii) On-site traffic flow and parking to ensure safety and convenience and that no avoidable off-site traffic flow impediments are caused by development. The provisions of Policy TC-3A of the Traffic Circulation Subelement, which address access management, shall apply.

LU-9J. Miami-Dade County shall continue to use the design guidelines established in its urban design manual as additional criteria for use in the review of all applications for new residential, commercial and industrial development in unincorporated Miami-Dade County, and shall consider the inclusion of such guidelines into its land development regulations.

LU-9L. Miami-Dade County shall formulate and adopt zoning overlay or other regulations applicable to land outside the Urban Development Boundary to orient the uses allowed in business and industrial zoning districts to those which support the rural and agricultural economy of the area. Uses permitted by right would relate exclusively to agricultural or mining industries, and other uses would be approvable as special exceptions upon demonstration that the use supports the non-urban economy of that area or is required by residents of the immediate area.

- Concept 1. Control the extent and phasing of urban development in order to coordinate development with the programmed provision of public services.
- Concept 2. Preserve and conserve land with valuable environmental characteristics, recreation uses or scenic appeal.
- Concept 14. Encourage agriculture as a viable economic use of suitable lands.
- CON-2. Protect ground and surface water resources from degradation, provide for effective surveillance for pollution and clean up polluted areas to meet all applicable federal, state and County ground and surface water quality standards.
- CON-2A. The basin stormwater master plans produced by Miami-Dade County pursuant to Objective CON-5 will establish priority listings of stormwater/drainage improvements to correct existing system deficiencies and problems and to provide for future development. At a minimum, these lists shall include:
- Drainage/stormwater sewer systems within wellfield protection areas;
 - Drainage/stormwater sewer systems in industrial and heavy business areas and areas with large concentrations of small hazardous waste generators;
 - Basins and sub-basins that fail to meet the target criteria for the twelve NPDES priority pollutants listed in Policy CON- 5A.
- CON-3A. No new facilities that use, handle, generate, transport or dispose of hazardous wastes shall be permitted within wellfield protection areas, and all existing facilities that use, handle, generate, transport or dispose of more than the maximum allowable quantity of hazardous wastes (as specified in Chapter 24-43 of the Code of Miami-Dade County, as may be amended from time to time) within wellfield protection areas shall be required to take substantial measures such as secondary containment and improved operating procedures to ensure environmentally safe operations.
- CON-3B. The water management systems that recharge regional wellfields shall be protected and enhanced.
- CON-3D. Miami-Dade County shall continue to utilize Best Management Practices established for agriculture within wellfield protection areas.
- CON-3F. The ambient groundwater monitoring program, which includes all wellfield protection areas, shall be continued to serve as an "early warning system" for monitoring high-risk land uses and point sources.
- CON-3G. Miami-Dade County shall re-evaluate the extent, and mandate periodic updating, of the protection areas for all public water supply wellfields to adjust the protection areas and programs for those wellfields, as warranted. The County shall ensure that new surface water bodies are adequately set back from wellfields to provide an adequate rock buffer to ensure protection of water quality and maintenance of the groundwater classification of the wellfields.
- CON-6B. Rockmining or quarrying uses may be approved in the Rockmining Overlay Zoning Area, the Lake Belt Area as defined by state law, and in those Open Land Subareas specified by the CDMP. However, the County shall continue to protect

natural resources including surface water and groundwater, agricultural land, and publicly owned wetlands including the Everglades National Park.

- CON-6E. Miami-Dade County shall continue to pursue programs and mechanisms to support the local agriculture industry, and the preservation of land suitable for agriculture.
- CON-6F. Miami-Dade County shall coordinate with cities to develop a long-term vision for agricultural and other undeveloped lands outside of the UDB to ensure these lands continue to support urban communities and protect native plant and animal species from climate related impacts. Long-term land planning outside the UDB should also consider water storage opportunities.
- WS-1D. The County shall protect the integrity of groundwater within wellfield protection areas by strict adherence to the Wellfield Protection Ordinances, by rigorous enforcement of sanitary sewer requirements, hazardous waste prohibitions, land use restrictions, and all other applicable regulations, and by supporting system improvements which are designed to protect or enhance the raw water supply. Existing and future wellfields of exceptional quality, such as the Northwest Wellfield, shall be particularly addressed in the regulations to prevent degradation of water quality.
- WS-1H. New water supply or wastewater collection lines should not be extended to provide service to land within areas designated Agriculture, Open Land, or Environmental Protection on the Land Use Plan map. New water or wastewater lines to serve land within these areas should be approved or required only where the absence of the facility would result in an imminent threat to public health or safety. The use of onsite facilities should be given priority consideration. In all cases, facilities should be sized only to service the area where the imminent threat would exist, to avoid inducing additional urban development in the area. This policy will not preclude federal, State or local long-range planning or design of facilities to serve areas within the Urban Development Boundary (UDB) or Urban Expansion Area (UEA). Public health and safety determinations will be made in accordance with Chapter 24 of the Code of Miami-Dade County (Environmental Protection) and Section 2- 103.20, et seq., (Water Supply for Fire Suppression) Code of Miami-Dade County.
- WS-6A. Miami-Dade County shall continue to utilize, expand and pursue the development of new potable water wellfields and alternative water supplies to meet the County's existing and future water supply needs. After 2013, Miami-Dade County will meet all water supply demands associated with new growth from alternative water supply sources, which may include: withdrawals from the Floridan Aquifer, implementation of water conservation methods, and development of reclaimed and wastewater reuse strategies.
- WS-6B. Miami-Dade County shall take the steps necessary to assure that all viable potable water wellfields in the County remain available for use and possible future expansion. Such steps may include, but shall not be limited to, the renewal of withdrawal permits and the extension of the County's wellfield protection measures.