

**NOVEMBER 2015
APPLICATIONS TO AMEND THE
COMPREHENSIVE DEVELOPMENT
MASTER PLAN**

FOR MIAMI-DADE COUNTY, FLORIDA



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NOVEMBER 2015
APPLICATIONS TO AMEND
THE COMPREHENSIVE DEVELOPMENT
MASTER PLAN

December 21, 2015

Miami-Dade County
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BACKGROUND AND INTRODUCTION

The purpose of this report is to present the applications to amend the Miami-Dade County Comprehensive Development Master Plan (CDMP), which were filed for evaluation during the November 2015 amendment review cycle. Amendments to the CDMP may be needed to correct an error, to reflect changing circumstances or conditions in the community, or to improve the ability of the CDMP to fulfill its purposes and goals. This report contains the tentative schedule of activities for this amendment review period, a table summarizing all of the applications, followed by a copy of each application, among other information.

Section 2-116.1 of the Miami-Dade County (County) Code establishes the exclusive procedures for the CDMP to be evaluated and amended periodically, usually semiannually. These procedures involve thorough reviews by the County, the State Land Planning Agency and other state and regional agencies (reviewing agencies) as required by Chapter 163, Florida Statutes (F.S.). Current procedures provide for the filing of applications in the months of May and November, staff analysis of the applications and public participation in the amendment process, which generally takes eleven months to complete. CDMP components eligible for amendment during the various semiannual filing periods are summarized below*.

Application Filing Period/Cycle (month)	CDMP Components Eligible for Amendment	
	Even Numbered Years	Odd-Numbered Years
May Filing Period	All Components Except UDB, UEA and Land Use Outside UDB	All Components Including UDB and UEA
November Filing Period	All Components Except UDB, UEA and Land Use Outside UDB	All Components Except UDB and UEA and Land Use Outside UDB

*Source: Section 2-116.1, Code of Miami-Dade County.

Each CDMP amendment application will be thoroughly evaluated by the Department of Regulatory and Economic Resources (Department) in coordination with other County departments and will be subject to further review at a series of public hearings. The final action adopting, adopting with change, or denying each or all of the applications will be made by the Miami-Dade Board of County Commissioners (Board). Further details about the hearings and the review process are discussed in the next section.

Application Review Process and Schedule of Activities

The following is a summary of the CDMP review and amendment activities and the tentative schedule as required by Section 2-116.1, Code of Miami-Dade County (See Table 1). After all privately filed applications were finalized, the Department published this Applications Report on December 21, 2015, presenting all applications filed.

The review process primarily consists of two phases. In the first phase, the Department will evaluate each application and submit its recommendations to the Planning Advisory Board (PAB) and the directly affected Community Councils regarding each requested change in an Initial Recommendations report due to be published on or before February 25, 2016. Each directly affected Community Council in which a proposed amendment to the Land Use Plan map is located, at its option, may hold a public hearing in March 2016 to discuss the application(s), and to formulate recommendation(s) to the PAB and the Board regarding the request(s). The PAB, acting as the County's Local Planning Agency (LPA), pursuant to Part 2 of Chapter 163, F.S. will then hold a public hearing scheduled in April 2016 to receive comments on the proposed amendments and consider the Department's initial recommendations, and to formulate its recommendations to the Board. The LPA's recommendations will address adoption of requested "small-scale" amendments (if any) and transmittal of the "standard" amendments to the reviewing agencies for review and comment. The Board will conduct a public hearing scheduled in May 18, 2016, to consider taking final actions on the requested "small-scale" amendments (if any) and to address transmittal of the "standard" amendments to the reviewing agencies. Transmittal of "standard" amendment applications to the reviewing agencies for review and comment does not constitute adoption of the requested amendments.

The second phase of the review process begins after transmittal of the applications to the reviewing agencies, which is expected to occur in May 2016. The reviewing agencies are each expected to issue their comments in or about June 2016 addressing all transmitted applications. During the review period for the reviewing agencies, the Department will also review comments received at the transmittal hearings and any additional document/materials submitted, and may issue a Final Recommendations report to reflect any new information received prior to the final public hearing. The Department may also address any issues raised by the reviewing agencies in their respective comments in the Final Recommendations report. The Board will conduct a final public hearing scheduled for July 2016 at which it will take final actions on the pending amendment applications. Final action by the Board will be to adopt, adopt with change, or not adopt each or all of the transmitted applications.

Outside this regular CDMP amendment process, requests to amend the CDMP can be made only by the Board under a "Special" amendment process, or by an application for concurrent amendment of a Development of Regional Impact (DRI). Procedures for processing such "Special Amendment" or "Concurrent DRI/CDMP" amendments are established in Section 2-116.1 of the County Code.

Table 1
 Schedule of Activities
 November 2015-2016 CDMP Amendment Cycle

Pre-application Conference	Prior to Filing Application
Application Filing Period	November 2 to November 30, 2015
Deadline to withdraw Application and obtain return of full Fee. Notify applicant of deficiencies.	December 7, 2015
Deadline for resubmittal of unclear or incomplete Applications	Seventh business day after Notice of deficiency
Applications Report published by Department	December 21, 2015
Deadline for submitting Technical Reports	December 15, 2015
Deadline for submitting Declarations of Restrictions to be considered in the Initial Recommendations Report	December 15, 2015
Initial Recommendations Report released by the Department	February 25, 2016
Community Council(s) Public Hearing(s)	Specific date(s) to be set in March 2016
Planning Advisory Board (PAB), acting as Local Planning Agency (LPA), Public Hearing to formulate Recommendations regarding Adoption of Small-Scale Amendments and Transmittal of Standard Amendment requests to State Land Planning Agency (SLPA)	April 2016** County Commission Chamber 111 NW 1 Street Miami, Florida 33128
Board of County Commissioners (Board) Hearing and Action on Adoption of Small-Scale Amendments and Transmittal of Standard Amendment requests to SLPA	May 18, 2016 County Commission Chamber 111 NW 1 Street Miami, Florida 33128
Transmittal to SLPA and other Reviewing Agencies	May 2016 (Approximately 10 days after Board Transmittal Hearing)
Deadline for Filing Supplementary Reports by the Public	June 2016** Thirty (30) days after Board's transmittal hearing
Receipt of Comment Letters from Reviewing Agencies	June 2016 (Approximately 30 days after Transmittal)
Public Hearing and Final Action on Applications: Board of County Commissioners	Specific date(s) to be set in July 2016 (No later than 45 days after receipt of Comment Letters from reviewing agencies)

This was excerpted from the Instructions Report

Note:

** Estimated Date.

Dates are subject to change. All hearings will be noticed by newspaper advertisement.

Small-Scale Amendments

A procedure is provided for the expedited processing of "Small-scale" amendments to the Land Use Plan map as defined in Section 163.3187(2), F.S. This procedure authorizes the Board to take final action on small-scale requests to amend the Land Use Plan map at the May 2016 transmittal public hearing. An amendment application is eligible for expedited processing as a "Small-scale" amendment under the following conditions:

1. The proposed amendment involves a land use change of 10 acres or less.
2. The cumulative annual acreage of all small-scale amendments shall not exceed 120 acres.
3. The proposed amendment does not involve a text change to the goals, policies, and objectives of the local government's comprehensive plan, but only proposes a land use change to the future land use map for a site specific small scale development activity. However, text changes that relate directly to, and are adopted simultaneously with, the small scale future land use map amendment shall be permissible under this section.

Any applicant who wants his/her eligible application processed under the expedited "Small-scale" amendment procedure must explicitly make such a request in the application. Generally, "Small-scale" amendments will not be reviewed by the SLPA or issued a notice of intent, and will take effect 31 days after adoption by the Commission unless a challenge is timely filed against the amendment.

No applications were filed in the November 2015 CDMP Amendment Cycle that are eligible and have requested to be processed under the small-scale amendment procedure.

Prohibition on Argument or Representation Regarding Proposed Specific Future Uses Without Proffering a Declaration of Restrictions

According to County Ordinance 03-40 pertaining to CDMP procedures, no applicant or applicant's representative seeking a recommendation for approval or approval of an amendment to the Land Use Plan map shall be permitted to argue or represent to the Board or other recommending County board a specific future use or uses for an application site without such representation being proffered in a Declaration of Restrictions (covenant). The representation cannot include a specific use or uses or exclude a use or uses authorized by the proposed land use designation, unless the applicant has submitted a covenant committing to such representation for the subject property, which has been submitted to the Director and has received approval as to form. The covenant and associated opinion of title and joinders must be submitted to the Metropolitan Planning Section of the Department and a copy to the Office of the Assistant Director for Planning on the 12th floor. The applicant or applicant's representative should also deliver the fully executed documents with all signatures on the covenant, Opinion of Title, any and all joinders to the Metropolitan Planning Section. The Department will hold the final executed covenant until the Ordinance accepting the covenant with adoption of the amendment becomes effective, then the covenant will be recorded. The Department Administrative Staff will contact the applicant(s) or the applicant's representative(s) for payment of the appropriate fee before recording the covenant through the Clerk of the Courts Office.

Deadlines for Submitting Declaration of Restrictions By Applicants

The Department has established deadlines for the submission of Declaration of Restrictions at different stages throughout the CDMP application review process. These deadlines allow for adequate review of proffered Declaration of Restrictions by the Department, and for consideration by the affected Community Councils, the Planning Advisory Board and the Board of County Commissioners at their respective public hearings. The table below indicates these deadlines:

Table 2
Declaration of Restrictions Submission Deadlines
November 2015-2016 CDMP Amendment Cycle

Deadline for submitting Declaration of Restrictions to be considered in the Initial Recommendations Report	December 15, 2015
Deadline for submitting new or revised Declaration of Restrictions to be considered at Community Council(s) Public Hearing(s)	17 days prior to Community Council hearing
Deadline for submitting new or revised Declaration of Restrictions to be considered at Planning Advisory Board (PAB) Hearing Regarding Adoption of Small-Scale Amendments and Transmittal/Adoption of Standard Amendments	17 days prior to PAB Hearing
Deadline for submitting new or revised Declaration of Restrictions to be considered at Board of County Commissioners (Board)'s Hearing Regarding Adoption of Small-Scale Amendments and Transmittal of Standard Amendments	17 days prior to BCC Hearing
Deadline for submitting Declaration of Restrictions to be considered in the Final Recommendations Report	4 weeks prior to BCC Final Hearing
Deadline for submitting Declaration of Restrictions to be considered at BCC Hearing Regarding Adoption of Standard Amendments	17 days prior to BCC Final Hearing

Additional Information

Anyone having questions regarding any aspect of the CDMP review and amendment process should visit or call the Metropolitan Planning Section of the Miami-Dade County Department of Regulatory and Economic Resources at 111 NW 1st Street, 12th Floor; Miami, Florida 33128-1972; telephone (305) 375-2835.

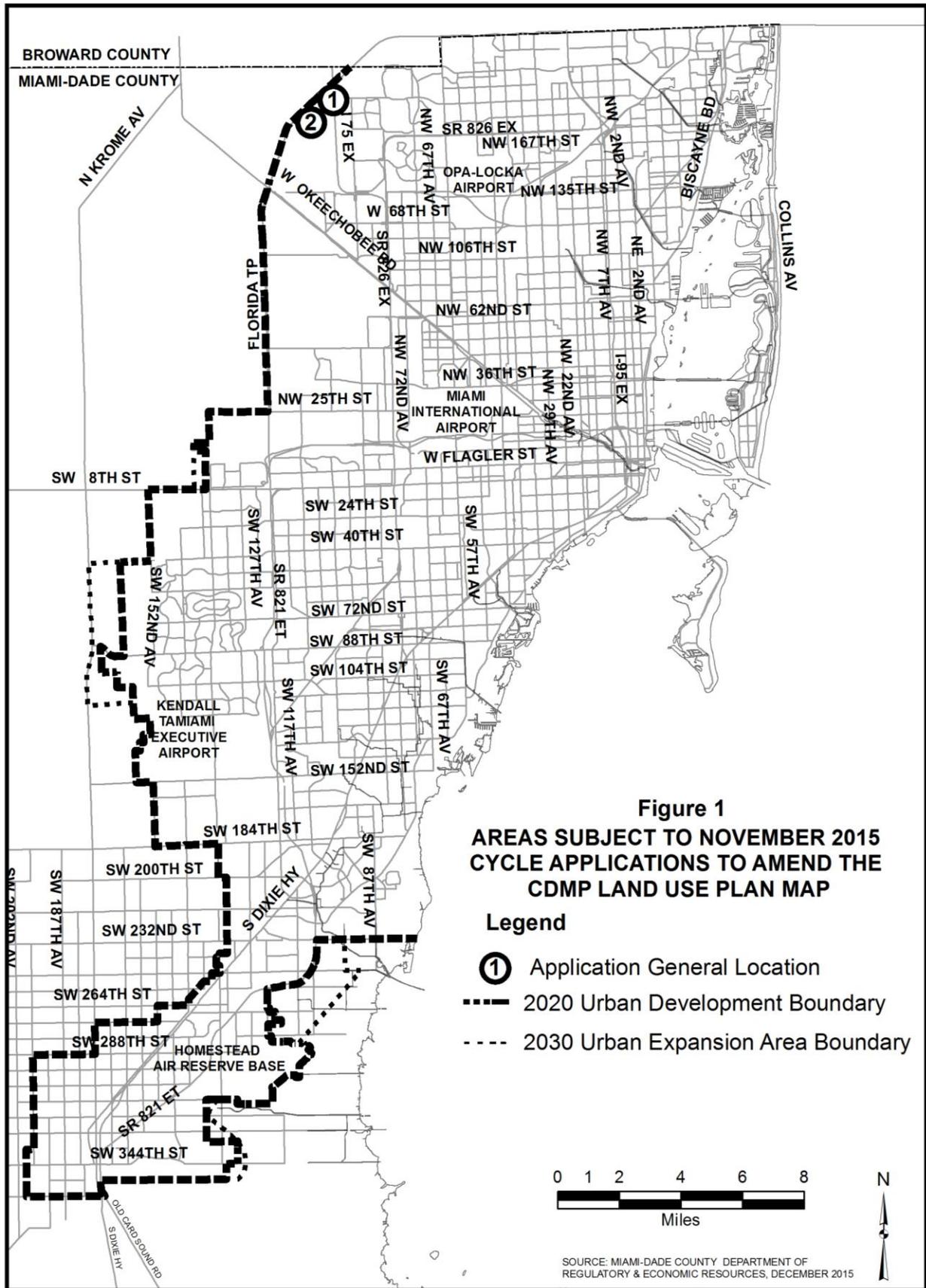
OVERVIEW OF THE NOVEMBER 2015 AMENDMENT APPLICATIONS

Two (2) applications (Application Nos. 1 and 2) were filed and are being evaluated in the November 2015 CDMP Amendment Cycle. Both applications were filed by private parties and seek changes to the CDMP Adopted 2020 and 2030 Land Use Plan (LUP) map and the CDMP Land Use Element text. Application No. 1 also seeks changes to maps within the CDMP Transportation Element. Each application is further described in Table 3 below and their general locations are identified in Figure 1 on Page 3.

TABLE 3
NOVEMBER 2015 APPLICATIONS REQUESTING AMENDMENTS TO THE
COMPREHENSIVE DEVELOPMENT MASTER PLAN

Application Number	Applicant/Representative Location Requested Change(s)	Acres
1	International Atlantic, LLC. / Miguel Diaz de la Portilla, Esq., & Elinette Ruiz, Esq. Location: East of the HEFT and west of I-75 between NW 178 Street and the intersection of I-75 and HEFT. <u>Requested Amendment to the CDMP LUP map and text:</u> 1. Redesignate the application site on the Land Use Plan map: From: "Industrial and Office" To: "Business and Office" 2. Delete the 0.45 FAR limitation on the portion of the Application area west of NW 97 Avenue; 3. Release the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of land within the subject property; 4. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board; and 5. Amend the Transportation Element Figure 1 – Planned Year 2030 Roadway Network; Figure 2 – Roadway Classification 2012; and Figure 3 – Roadway Functional Classification 2030). Standard Amendment	±194.48 Gross ±169.77 Net

Application Number	Applicant/Representative Location Requested Change(s)	Acres
2	The Graham Companies / Tracy R. Slavens, Esq., & Joseph G. Goldstein, Esq. Location: East of the HEFT and west of I-75 between NW 170 and NW 180 Streets.	±339 Gross ±323.6 Net
<u>Requested Amendment to the CDMP LUP map and text:</u>		
<ol style="list-style-type: none"> 1. Redesignate the application site on the Land Use Plan map: <ul style="list-style-type: none"> From: Parcel A: "Industrial and Office" and Parcel B: "Business and Office" To: "Business and Office" and "Employment Center" 2. Release the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of land within the subject property; and 3. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board; and. 		
Standard Amendment		



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**APPLICATION NO. 1
STANDARD AMENDMENT APPLICATION**

Applicant	Applicant's Representative
International Atlantic, LLC.	Miguel Diaz de la Portilla, Esq., & Elinette Ruiz, Esq. Arnstein & Lehr, LLP 200 South Biscayne Blvd., Suite 3600 Miami, Florida 33131 (305) 428-4543

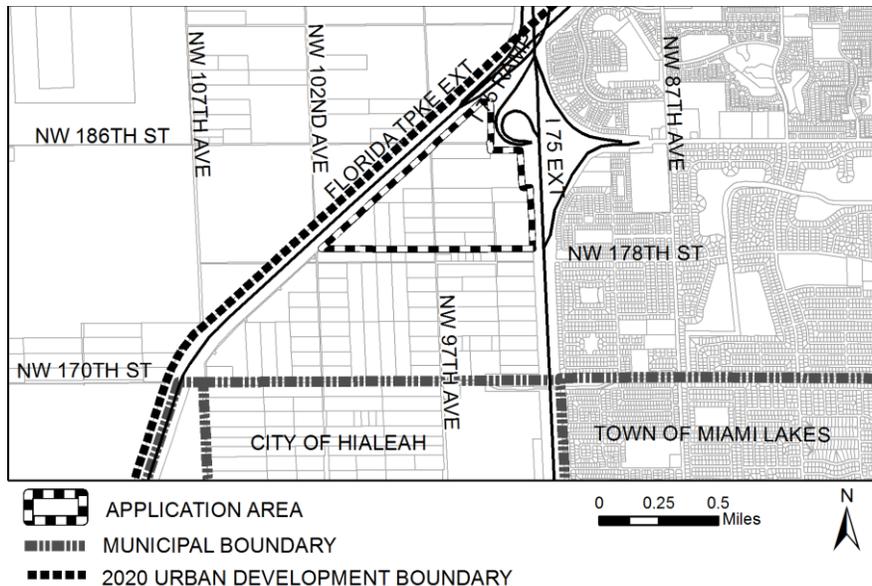
Requested Amendment to the CDMP LUP map and text:

1. Redesignate the application site on the Land Use Plan map:
From: "Industrial and Office"
To: "Business and Office"
2. Delete the 0.45 FAR limitation on the portion of the Application area west of NW 97 Avenue;
3. Release the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of land within the subject property;
4. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board; and
5. Amend the Transportation Element Figure 1 – Planned Year 2030 Roadway Network; Figure 2 – Roadway Classification 2012; and Figure 3 – Roadway Functional Classification 2030).

Location: East of the HEFT and west of I-75 between NW 178 Street and the intersection of I-75 and HEFT.

Acreage: Application Area: ±194.48 Gross; ±169.77 Net

Acreage Owned by Applicant: ±92.25 Gross ; 72.53 Net



Notes:

1. This page is not part of the Application that was filed by the applicant.
2. The Disclosure of Interest published herein contains only those applicable pages; all others were deleted.

**APPLICATION FOR AN AMENDMENT
TO THE
COMPREHENSIVE DEVELOPMENT MASTER PLAN FOR MIAMI-DADE COUNTY,
FLORIDA**

as adopted on October 2, 2013, and as amended through May 6, 2015

1. APPLICANT

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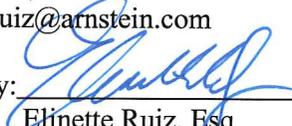
2. APPLICANT'S REPRESENTATIVES

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By: 
Miguel Diaz de la Portilla, Esq.

11/30/15
Date

By: 
Elinette Ruiz, Esq.

11/30/15
Date

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3. DESCRIPTION OF REQUESTED CHANGE

A. The following changes to the Land Use Element, Land Use Plan Map and Transportation Element are being requested:

- i. The re-designation of approximately ±194 gross acres of land within the subject property from "Industrial and Office" to "Business and Office." (item A.1 on the fee schedule).
- ii. Text amendment to delete the 0.45 FAR (page I-24 of the Land Use Element) on the portion of the Application Area west of NW 97th Avenue. (item A.2 on the fee schedule).
- iii. Release of Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of land within the subject property. (item A.4 on the fee schedule).
- iv. The acceptance of a proffered declaration of restrictions on the subject property to limit the development program as described hereinafter.
- v. Amendments to the Transportation Element figures including: Figure 1 – Planned Year 2030 Roadway Network on page II-21 (item B.1 on the fee schedule); Figure 2 – Roadway Classification 2012 on page II-22 (item B.2 on the fee schedule).

schedule); and Figure 3 – Roadway Functional Classification 2030 on page II-23 (item B.2 on the fee schedule).

B. Description of the Subject Property.

The subject property of request A.i. consists of approximately ±194 gross acres of land located in Sections 8 and 9, Township 52, Range 40, of unincorporated Miami-Dade County, Florida (the “Property” and also hereinafter referred to as either “American Dream Miami Application Area” or “American Dream Miami”). More specifically, the Property is located east of the Homestead Extension of Florida’s Turnpike (“HEFT”) and west of Interstate 75 (“I-75”) between NW 178 Street and the intersection of I-75 and HEFT. A legal description of the Property is provided in Exhibit A.

The subject property of request A.iii. consists of approximately ±65.9 gross acres of land located north of NW 170 Street between NW 97 Avenue and the HEFT and is more specifically described in the legal description provided in Exhibit A (the “Graham Triangle”).

C. Gross and Net Acreage.

Subject application area:	±194.48 gross acres
	±169.77 net acres
Acreage owned by Applicants:	±92.25 gross acres
	±72.53 net acres

D. Requested Change.

- i.** It is requested that the American Dream Miami Application Area be redesignated on the Land Use Plan Map from “Industrial and Office” to “Business and Office.”
- ii.** A text amendment is requested to delete the 0.45 FAR limitation on the portion of Application Area west of NW 97th Avenue.
- iii.** It is requested that the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, be released as it applies to portions of land within the subject property.
- iv.** It is requested that a proffered declaration of restrictions limiting the development program for the American Dream Miami Application Area be accepted by Miami-Dade County.
- v.** It is requested that the Transportation Element figures (including: Figure 1 – Planned Year 2030 Roadway Network; Figure 2 – Roadway Classification 2012; and Figure 3 – Roadway Functional Classification 2030.

4. REASONS FOR AMENDMENT

The American Dream Miami Application Area is a large area of vacant land located in Sections 8 and 9, Township 52, Range 40, in unincorporated Miami-Dade County. The American Dream Miami Application Area is located in the North Central Tier of the County intersecting with, near, or abutting (a) two section line roads: NW 97 Avenue and NW 186 Street; and (b) two expressways: the HEFT and I-75.

The Property is located within Minor Statistical Area (“MSA”) 3.1, which is largely undeveloped. The MSA encompasses a wide area of western Miami-Dade County and contains all types of land uses. The developable areas within its boundaries lie generally between the Urban Development Boundary, US-27/Okeechobee Road, NW 57 Avenue, and NW 103 Street.

Redesignation of the American Dream Miami Application Area

The Graham Triangle, which is a portion of the American Dream Miami Application Area was part of CDMP Amendment Application No. 5 of the April 2005 Cycle (the “2005 Amendment”). The 2005 Amendment expanded the Urban Development Boundary (“UDB”) to include 1,140.8± acres of land and redesignated said lands from “Open Land” to “Industrial and Office” on the CDMP Land Use Plan Map. A portion of this land, approximately ½-mile south of the American Dream Miami Application Area and located within the City of Hialeah, is under development as an industrial and office park known as the Beacon Countyline project. The remainder of the 2005 Amendment subject property, which includes the American Dream Miami Application Area, is undeveloped. The parcel of land lying directly to the south of the American Dream Miami Application Area has been identified as mixed-use development. East of I-75 is predominantly developed with single-family residential use.

The Applicant is seeking to redesignate the American Dream Miami Application Area as proposed in order to allow for more flexibility of uses permitted on the property. Currently, the American Dream Miami Application Area is designated “Industrial and Office,” which allows manufacturing operations, maintenance and repair facilities, warehouses, mini-warehouses, office buildings, wholesale showrooms, distribution centers, and similar uses. Based on the pattern of development in the surrounding areas and the proposed American Dream Miami project, the Applicant has determined that it is appropriate to redesignate the land to a category that allows a wider range of permitted uses and better promotes a mix of uses and infill development.

The Applicant is proposing the redesignation of the American Dream Miami Application Area from “Industrial and Office” to “Business and Office”. The “Business and Office” category accommodates the full range of sales and service activities, which includes retail, wholesale, personal and professional services, call centers, commercial and professional offices, hotels, motels, hospitals, medical buildings, nursing homes, entertainment and cultural facilities, amusement and commercial recreation establishments. Residential uses, and mixing of residential use with commercial, light industrial, office and hotels are also permitted in Business and Office areas. The proposed redesignation of the American Dream Miami Application Area will encourage integrated mixed-use infill development that will be responsive to and supportive of the industrial and office uses to the south, and residential uses to the east.

American Dream Miami has several attributes, including (1) the location of the Property with near a high residential and workforce population, (2) its proximity to several major roadways and (3) the size of the Property, which all work together to make this an ideal location for a unique Entertainment/Retail project. American Dream Miami will create thousands of permanent jobs for residents of Miami-Dade County and will be a true Entertainment/Retail destination for the many residents of the immediate area, as well as residents throughout the County and beyond. Plans for the entertainment retail project include resort hotels, an amusement park, a water park, an indoor ski facility, recreational lake and many other entertainment oriented uses. The Property includes +/-194 acres of available land inside the UDB which will allow for a cohesive project combining many types of entertainment and retail components that collectively would generate natural synergy. The Applicant has committed to creating no less than 7500 permanent jobs. The Applicant is committed to providing significant employment opportunities through the County’s Small Business Enterprise Architectural and Engineering program and to the County’s Community Small Business Enterprise Construction Services program. These much needed jobs will help promote the creation and development of small and medium size enterprises that will meet the socio-economic needs of Miami-Dade County.

Text Amendment to Land Use Element

The density and intensity of development within the American Dream Miami Application Area is regulated by the CDMP Land Use Element “Business and Office” residential density guidelines. The maximum non-residential intensity within the American Dream Miami Application Area is currently set forth by the CDMP Land Use Element page I-24 as follows:

For the area bounded by NW 154 Street on the south, NW 97 Avenue on the east, and the Homestead Extension of the Florida Turnpike (HEFT) on the northwest, the maximum allowable intensity under the CDMP shall be a FAR of 0.45, pursuant to the 2006 Settlement Agreement between the State of Florida and Miami-Dade County [Docket No. DCA 06-1-NOI-1301-(A)-(N)] pertaining to adopted April 2005 CDMP amendment Application No. 5.

The Applicant is requesting that this paragraph be deleted in its entirety.

Release of the Declaration of Restrictions, Recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, and Acceptance of the Proffered Declaration of Restrictions.

In 2006, the then Applicant proffered that certain Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, in connection with the approval of the redesignation of the Graham Triangle pursuant to CDMP Amendment Application No. 5 of the April 2005 Cycle from “Open Land” to “Industrial and Office.” This Declaration of Restrictions prohibits residential use within the Graham Triangle Area and limits development of the land to uses generating no more than 2,582 net external P.M. peak hour trips. The proposed redesignation of the American Dream Miami Application Area to “Business and Office” and the Applicant’s intent to develop greater than 2,582 net external P.M. peak hour trips would require the release of this previously recorded Declaration of Restrictions as it pertains to the subject property.

The applicant intends to impose new conditions on the development of the American Dream Miami Application Area in the event that the request for its redesignation to “Business and Office.” As such, the Applicant is requesting the release of the Declaration of Restrictions recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida and acceptance of the new Declaration of Restrictions that is being proffered by the Applicant. The Declaration of Restrictions being proffered would limit the development program within the American Dream Miami Application Area to Entertainment/Retail of 6.2 million square feet plus 2,000 hotel rooms.

Changes to the Transportation Element

American Dream Miami is proposed for a triangular shaped parcel bounded by I-75, HEFT and NW 180th Street. Theoretical NW 97th Avenue extends north-south from NW 180th Street to NW 186th Street through the center of the parcel. This theoretical roadway will be realigned as part of the ring-road that will circumnavigate the development. This roadway realignment will be reflected in modifications to Transportation Element Figures: 1 – Planned Year 2030 Roadway Network; 2 – Roadway Classification 2012; and, 3 – Roadway Functional Classification 2030.

A new interchange is proposed for the HEFT at NW 170 Street as indicated in the 2040 Long Range Transportation Plan.

Consistency with CDMP Objectives and Policies

This application helps implement several objectives and policies within the Land Use Element, Transportation Element, Economic Element, and the Community Health and Design Element of the CDMP. These objectives and policies are shown in bold below and each is followed by a discussion of the project's consistency.

LU-8E: Applications requesting amendments to the CDMP Land Use Plan Map shall be evaluated to consider consistency with the Goals, Objectives and Policies of all Elements, other timely issues, and in particular the extent to which the proposal if approved, would:

- i. Satisfy a deficiency in the Plan Map to accommodate projected population or economic growth of the County;**
- ii. Enhance or impede provision of services at or above adopted LOS Standards;**
- iii. Be compatible with abutting and nearby land uses and protect the character of established neighborhoods; and**
- iv. Enhance or degrade environmental or historical resources, features or systems of County significance; and**
- v. If located in a planned Urban Center, or within 1/4 mile of an existing or planned transit station, exclusive busway stop, transit center, or standard or express bus stop served by peak period headways of 20 or fewer minutes, would be a use that promotes transit ridership and pedestrianism as indicated in the policies under Objective LU-7, herein.**

CDMP Land Use Element Policy LU-8E provides evaluation criteria for applications seeking amendments to the CDMP Future Land Use Map. Approval of this application will accommodate additional economic growth in the County, will not impede the provision of services at or above adopted LOS standards, will be compatible with abutting and nearby land uses and protect the existing character of the area, and will not degrade environmental or historical resources.

Land Supply. Because of the limited availability of large potential entertainment and retail development sites within Miami-Dade County, this application presents an opportunity to introduce a unique entertainment and retail destination. American Dream Miami will provide a regional entertainment and retail destination, and will accommodate and enhance the economic growth of the County by creating much needed permanent jobs in Miami-Dade County.

Infrastructure. The Applicant understands that both water and sewer connections are available adjacent to the site. As to potable water, the Planning Considerations Reports for the November 2014 and May 2015 Cycles state that all of the County's water treatment plants are currently operating within the LOS standards. This application will not have an adverse impact. The same report addresses sewer capacity and indicates that some areas are at or close to capacity. Consequently, DERM will address the availability of water and sewer service on a case by case basis. The Applicant does not anticipate that the approval of this application will result in a deficiency in the LOS. The Applicant will work with DERM to address any potential concerns.

The roadway network is particularly well developed around the Application Area. The Property abuts the Homestead Extension of the Florida Turnpike (HEFT) and I-75.

Compatibility. Applicant will address compatibility issues in more detail during the site plan approval process for the American Dream Miami project. The entertainment and retail uses proposed for the Property are compatible with surrounding uses. American Dream Miami will be a welcome addition for the residential uses nearby, and will be compatible with nearby industrial uses. Furthermore, its proximity to major roadways will enhance the accessibility to the site.

Historical and Environmental Resources. There are no historically or archeologically significant structures on the Property. Therefore, this application will have no impact on the County's historical resources. As to the environmental considerations, the Applicant has retained an environmental engineer to ensure that American Dream Miami will comply with all applicable environmental regulations. In particular, the Applicant and its consultant will address during the CDMP amendment process such environmental issues, as wetlands, wildlife, vegetation, and water. After any approval of the application, Applicant and its consultant will apply for and obtain any and all necessary environmental permits prior to commencing site development.

LU-1A: High intensity, well-designed urban centers shall be facilitated by Miami-Dade County at locations having high countywide multimodal accessibility.

LU-1B: Major centers of activity, industrial complexes, regional shopping centers, large-scale office centers and other concentrations of significant employment shall be the structuring elements of the metropolitan area and shall be sited on the basis of metropolitan-scale considerations at locations with good countywide, multi-modal accessibility.

CDMP Land Use Element Policies LU-1A and LU-1B encourage major centers of activity, including regional shopping centers, to be sited at locations with good countywide, multi-modal accessibility. The proximity of the Property to the HEFT and I-75 makes this an ideal location for a major entertainment and retail center. The proposed Palmetto Express Bus route which is proposed to run from the intersection of NW 186 Street and I-75 to the Palmetto Metrorail Station will help provide multi-modal accessibility. The Applicant will be working closely with the County to explore additional opportunities to provide multi-modal accessibility.

LU-1C: Miami-Dade County shall 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 all necessary urban services and facilities are projected to have capacity to accommodate additional demand.

CDMP Land Use Element Policy LU-1C requires the County to give priority to infill development on vacant sites in the currently urbanized areas. Approval of this application will serve to give priority to infill development on vacant sites in currently urbanized areas as the application provides for infill development and the application area is comprised of vacant parcels abutting urbanized areas.

LU-1G. Business developments shall preferably be placed in clusters or nodes in the vicinity of major roadway intersections, and not in continuous strips or as isolated spots, with the exception of small neighborhood nodes. Business developments shall be designed to relate to adjacent development, and large uses should be planned and designed to serve as an anchor for adjoining smaller businesses or the adjacent business district. Granting of commercial or other non-residential zoning by the County is not necessarily warranted on a

given property by virtue of nearby or adjacent roadway construction or expansion, or by its location at the intersection of two roadways.

CDMP Land Use Element Policy LU-IG encourages business developments to be placed in clusters or nodes at the intersections of major roadways. The Property abuts the HEFT to the west and I-75 to the east, both major roadways. Both of these roadways intersect immediately north of the Property. Coincidentally, the intersection of HEFT and I-75 is also the general location of two section line roadways – NW 97 Avenue and NW 186 Street. This “super intersection” of these roadways essentially creates an activity node where business development should be encouraged, consistent with the CDMP’s Guidelines for Urban Form. The Property’s proximity to the Turnpike and I-75 makes it particularly suitable as an entertainment and retail destination, since existing roadways will provide easy access to the site. To the extent that any roadway deficiencies are identified, the Applicant will work with the County, State, and Federal Governments to address any potential deficiency by appropriate mitigation measures.

LU-10. Miami-Dade County shall seek to prevent discontinuous, scattered development at the urban fringe particularly in the Agriculture Areas, through its CDMP amendment process, regulatory and capital improvements programs and intergovernmental coordination activities.

CDMP Land Use Element Policy LU-10 requires the County to “prevent discontinuous, scattered development at the urban fringe.” The Property is infill development surrounded by lands to the north and west that either have been or are under excavation; it is also contiguous with existing development east of I-75 and developable land designated for urban uses to the South. A well-planned entertainment and retail project would further enhance the uses to the east of the Property and throughout the County.

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 Services (LOS) standards specified in the Capital Improvements Element (CIE).

CDMP Land Use Element Policy LU-2A establishes that development orders will only be approved for projects when the provision of public services and facilities for the proposed development result in a LOS that meets or exceeds the standards identified in CIE. The proposed amendment, subject to the proffered declaration of restrictions, is expected to have no adverse impact on public infrastructure. Because of the location of the residential development east of the Property, a water main and sewer force main already exist and extend south and east of the site. The Applicant has begun discussions with the Miami-Dade Water and Sewer Department to ensure that it will be able to connect to these lines after approval of this Application.

LU-8A. Miami-Dade County shall strive to accommodate residential development in suitable locations and densities which reflect such factors as recent trends in location and design of residential units; a variety of affordable housing options; projected availability of service and infrastructure capacity; proximity and accessibility to employment, commercial and cultural centers; character of existing adjacent or surrounding neighborhoods; avoidance of natural resources degradation; maintenance of quality of life and creation of amenities. Density patterns should reflect the Guidelines for Urban Form contained in this Element.

CDMP Land Use Element Policy LU-8A requires the County to strive to accommodate proximity and accessibility to employment, commercial and cultural centers, as well as create amenities. American Dream Miami will serve as an accessible employment, entertainment and retail center near the existing communities of Hialeah, Town of Miami Lakes, Miami Gardens, and the unincorporated municipal

service area. Furthermore, the proximity to the HEFT and I-75 makes it an ideal location for this development.

TE-1A. As provided in this section and the Mass Transit Subelement, the County shall promote mass transit alternatives to the personal automobile, such as rapid transit (i.e. heavy rail, light rail, and bus rapid transit, premium transit (enhanced and/or express bus)), local route bus and paratransit services.

CDMP Transportation Element Policy TE-1A requires the County to promote mass transit alternatives to personal automobiles. American Dream Miami will be designed to accommodate mass transit buses on-site. Furthermore, the project's patrons and employees provide ridership that will support the Palmetto Express Bus proposed in the CDMP Mass Transit subelement. See Figure 1 – Future Mass Transit System 2030 Metrobus Service Area and Rapid Transit Corridor, page II-39 of the Transportation Element. The Palmetto Express Bus route runs from the intersection of NW 186 Street and I-75 to the Palmetto Metrorail Station.

TE-2G. The County shall encourage inclusion in, and review, all plans and development proposals for provisions to accommodate safe movement of bicycle and pedestrian traffic, and facilities for securing non-motorized vehicles in all new development and redevelopment and shall address this as a consideration in development and site plan review.

CDMP Transportation Element Policy TE-2G encourages the County to accommodate the safe movement of bicycle and pedestrian traffic. The proposed project will be designed to provide safe movement of bicycle and pedestrians to and throughout the development. The project will encourage multimodal transportation alternatives to the personal automobile. Sidewalk and bike paths will be provided all through the project and bike racks will be sited at convenient and safe locations. The Applicant will work with the Miami-Dade Transit Agency to advance opportunities for multi-modal transportation alternatives.

TC-4B. The adopted Land Use Plan map shall be used to guide the planning of future transportation corridors and facilities to ensure the proper coordination between transportation planning and future development patterns.

CDMP Traffic Circulation Subelement Policy TC-4B seeks to ensure the proper coordination between transportation planning and future land use patterns. American Dream Miami is proposed at the intersection of I-75 and HEFT – two major roadways. I-75 runs north-south across the United States from its northern origination at US/Canadian border, south through southwest Florida and across the state from Fort Meyers to Miami; connecting the west and east coasts of Florida. The HEFT forms a link between Miami and Orlando while connecting southeast Florida to Miami. In addition, the project is located at the intersection NW 97 Ave and NW 186 Street – two section line roadways. These intersections form the appropriate location for a regional development, such as American Dream Miami.

TC-5D. The County shall encourage interconnectivity between neighborhoods, local services, schools, parks, employment centers, and transit stops and stations; discourage cul-de-sac and walled-in subdivision designs; and facilitate pedestrian-oriented urban design that connects neighborhoods and provides accessibility for non-drivers.

CDMP Traffic Circulation Subelement Policy TC-5D encourages the County to promote interconnectivity between uses and accessibility for persons not traveling by automobile. As stated previously, American Dream Miami supports the interconnection of the proposed project to the Metrorail at the Palmetto Station by way of the proposed Palmetto Express Bus. Furthermore, American Dream Miami will be a

dense, urban design that will promote pedestrian and bicycle activity. Most importantly, American Dream Miami will serve as a major employment center for the adjacent communities and for all of Miami-Dade County.

ECO-7A. Miami-Dade County's strategy for meeting countywide employment needs for the next several years should be to emphasize its strengths in international commerce, health services, the visitor industry, and aviation-related activities, and endeavor to expand in the areas of biomedical, film and entertainment, financial services, information technology and telecommunications, while simultaneously promoting the creation and development of small and medium-sized, labor intensive enterprises geared to the socio-economic needs and opportunities of specific neighborhoods and locations meant to serve a diversity of markets.

American Dream Miami will help Miami-Dade County implement ECO-7A by helping to meet countywide employment needs. The Applicant has committed to creating no less than 7500 permanent jobs. Additionally, the Applicant is committed to providing significant employment opportunities through the County's Small Business Enterprise Architectural and Engineering program and to the County's Community Small Business Enterprise Construction Services program. These much needed jobs will help promote the creation and development of small and medium size enterprises that will meet the socio-economic needs of Miami-Dade County.

CDMP Economic Element Policy ECO-7A also emphasizes the need to continue to strengthen the visitor industry. American Dream Miami will create jobs for residents while providing a high quality entertainment and retail destination for patrons and visitors from around the world.

CHD-1E. Designate locations for carpooling and bus stops that encourage residents to maintain a daily level of walking as part of their commute, and are designed in a manner that reflects the character of the community or district where the stops are located.

CDMP Community Health and Design Policy CHD-1E seeks locations and designs of carpooling and bus stops that encourage walking while being appropriately integrated into the design of the community. Such appropriately designated and designed stops will be appropriately implemented at American Dream Miami.

5. LOCATION MAP FOR APPLICATION

See Attached Exhibit C

6. ADDITIONAL MATERIAL SUBMITTED

Attachments: Legal Description and Survey of Property and Parcels – Composite Exhibit A
 Disclosure of Interest Form – Exhibit B
 Location Map for Application – Exhibit C
 Aerial Photograph – Exhibit D
 Section Sheet – Exhibit E

Additional information in support of the application is being submitted under separate cover.

7. DISCLOSURE OF INTEREST

See Attached Exhibit B

EXHIBIT A

Attachments



EXHIBIT B

Attachments



DISCLOSURE OF INTEREST

This form or a facsimile must be filed by all applicants having an ownership interest in any real property covered by an application to amend the Land Use Plan map. Submit this form with your application. Attach additional sheets where necessary.

1. APPLICANT (S) NAME AND ADDRESS:

International Atlantic LLC

APPLICANT A: One Meadowlands Plaza, 6th Floor, East Rutherford, NJ 07073

APPLICANT B:

APPLICANT C:

APPLICANT D:

APPLICANT E:

APPLICANT F:

APPLICANT G:

Use the above alphabetical designation for applicants in completing Sections 2 and 3, below.

2. PROPERTY DESCRIPTION: Provide the following information for all properties in the application area in which the applicant has an interest. Complete information must be provided for each parcel.

	APPLICANT	OWNER OF RECORD	FOLIO NUMBER	SIZE IN ACRES
A				
	See attached Exhibit "A"			

3. For each applicant, check the appropriate column to indicate the nature of the applicant's interest in the property identified in 2. above.

APPLICANT	OWNER	LESSEE	CONTRACTOR FOR PURCHASE	OTHER Explanation)	(Attach
A					
Please see attached Exhibit "A"					

4. DISCLOSURE OF APPLICANT'S INTEREST: Complete all appropriate sections and indicate N/A for each section that is not applicable.

- a. If the applicant is an individual (natural person) list the applicant and all other individual owners below and the percentage of interest held by each.

<u>INDIVIDUAL'S NAME AND ADDRESS</u>	<u>PERCENTAGE OF INTEREST</u>
N/A	

- b. If the applicant is a CORPORATION, list the corporation's name, the name and address of the principal stockholders and the percentage of stock owned by each. [Note: where the principal officers or stockholders, consist of another corporation (s), trustee(s), partnership(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity.]

CORPORATION NAME: International Atlantic LLC, Limited Liability Company

<u>NAME, ADDRESS, AND OFFICE (if applicable)</u>	<u>PERCENTAGE OF STOCK</u>
Nader Ghermezian Manager	100% interest
<u>International Atlantic LLC</u>	
<u>One Meadowlands Plaza, 6th Floor, East Rutherford, NJ 07073</u>	

- c. If the applicant is a TRUSTEE, list the trustee's name, the name and address of the beneficiaries of the trust, and the percentage of interest held by each. [Note: where the beneficiary/beneficiaries consist of corporation(s), partnership(s), or other similar entities, further disclosure shall be required which discloses the identity of the individual (s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

TRUSTEES
NAME: N/A

BENEFICIARY'S NAME AND ADDRESS

PERCENTAGE OF INTEREST

- d. If the applicant is a PARTNERSHIP or LIMITED PARTNERSHIP, list the name of the partnership, the name and address of the principals of the partnership, including general and limited partners and the percentage of interest held by each partner. [Note: where the partner (s) consist of another partnership(s), corporation (s) trust (s) or other similar entities, further disclosure shall be required which discloses the identity of the individual (s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

PARTNERSHIP NAME: N/A

NAME AND ADDRESS OF PARTNERS

PERCENTAGE OF INTEREST

- e. If the applicant is party to a CONTRACT FOR PURCHASE, whether contingent on this application or not, and whether a Corporation, Trustee, or Partnership, list the names of the contract purchasers below, including the principal officers, stockholders, beneficiaries, or partners. [Note: where the principal officers, stockholders, beneficiaries, or partners consist of another corporation, trust, partnership, or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

<u>NAME AND ADDRESS</u>	<u>PERCENTAGE OF INTEREST</u>
<u>Contract Purchaser: International Atlantic LLC,</u>	
<u>One Meadowlands Plaza, 6th Floor, East Rutherford, NJ 07073</u>	
<u>Nader Ghermezian, Manager of International Atlantic, LLC</u> <u>One Meadowlands Plaza, 6th Floor, East Rutherford, NJ 07073</u>	100%

*July 5, 2013-Contract with Tract 29, LLC
 June 2, 2014 Contract executed with TGC Sec. 8-9 North Point LLC by its sole member the Graham Companies; contract to be amended. Date of Contract: *

If any contingency clause or contract terms involve additional parties, list all individuals or officers if a corporation, partnership, or trust.

5. DISCLOSURE OF OWNER'S INTEREST: Complete only if an entity other than the applicant is the owner of record as shown on 2.a., above. See Exhibit "B"
- a. If the owner is an individual (natural person) list the applicant and all other individual owners below and the percentage of interest held by each.

<u>INDIVIDUAL'S NAME AND ADDRESS</u>	<u>PERCENTAGE OF INTEREST</u>

- b. If the owner is a CORPORATION, list the corporation's name, the name and address of the principal stockholders and the percentage of stock owned by each. [Note: where the principal officers or stockholders consist of another corporation(s), trustee(s) partnership(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity.]

CORPORATION NAME:

NAME, ADDRESS, AND OFFICE (if applicable)

PERCENTAGE OF STOCK

- c. If the owner is a TRUSTEE, and list the trustee's name, the name and address of the beneficiaries of the trust and the percentage of interest held by each. [Note: where the beneficiary/beneficiaries consist of corporation(s), another trust(s), partnership(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

TRUSTEE'S NAME:

BENEFICIARY'S NAME AND ADDRESS

PERCENTAGE OF INTEREST

- d. If the owner is a PARTNERSHIP or LIMITED PARTNERSHIP, list the name of the partnership, the name and address of the principals of the partnership, including general and limited partners, and the percentage of interest held by each. [Note: where the partner(s) consist of another partnership(s), corporation(s) trust(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

PARTNERSHIP NAME:

NAME AND ADDRESS OF PARTNERS

PERCENTAGE OF OWNERSHIP

- e. If the owner is party to a CONTRACT FOR PURCHASE, whether contingent on this application or not, and whether a Corporation, Trustee, or Partnership, list the names of the contract purchasers below, including the principal officers, stockholders, beneficiaries, or partners. [Note: where the principal officers, stockholders, beneficiaries, or partners consist of another corporation, trust, partnership, or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

NAME, ADDRESS, AND OFFICE (if applicable)

PERCENTAGE OF INTEREST

Date of Contract: _____

If any contingency clause or contract terms involve additional parties, list all individuals or officers, if a corporation, partnership, or trust.

For any changes of ownership or changes in contracts for purchase subsequent to the date of the application, but prior to the date of the final public hearing, a supplemental disclosure of interest shall be filed.

The above is a full disclosure of all parties of interest in this application to the best of my knowledge and behalf.

Applicant's Signatures and Printed Names

International Atlantic LLC,
a Delaware Limited Liability Company



By: [Signature]
Name: Nader Shekomejian
Title: Authorized Signatory

Sworn to and subscribed before me

this 24th day of November, 19 2015

[Signature]
Notary Public, State of ~~Florida~~ New Jersey at Large (SEAL)

My Commission Expires:

Disclosure shall not be required of any entity, the equity interest in which are regularly traded on an established securities market in the United States or other country; or pension funds or pension trusts of more than five thousand (5,000) ownership interests; any entity where ownership interests are held in a partnership, corporation or trust consisting of more than five thousand (5,000) separate interests including all interests at each level of ownership, and no one pension or entity holds more than a total of five (5) percent of the ownership interest in the partnership, corporation or trust; or of any entity, the ownership interest of which are held in a partnership, corporation or trust consisting of more than 5,000 separate interests and where no one person or entity holds more than a total of 5% of the ownership interest in the partnership, corporation or trust. Entities whose ownership interests are held in partnership, corporation, or trust consisting of more than five thousand (5,000) separate interests, including all interests at every level of ownership, shall only be required to disclose those ownership interest which exceed five (5) percent of the ownership interest in the partnership, corporation or trust.

EXHIBIT "A"

Owner of Record	Folio Number	Size in Acres	Applicant's Interest In Property
Portion: International Atlantic LLC Portion: State of Florida Department of Transportation	30-2004-000-0040		Owner Adjacent Owner
TGC Sec 8-9 North Point LLC	30-2008-001-0040		Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2008-001-0050		Contractor for Purchase
The Graham Companies	30-2008-001-0060		Contractor for Purchase
The Graham Companies	30-2008-001-0070		Contractor for Purchase
The Graham Companies	30-2008-001-0080		Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2008-001-0240		Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2008-001-0230		Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2008-001-0300		Contractor for Purchase
International Atlantic LLC	30-2009-001-0170		Owner
International Atlantic LLC (Successor by merger to Oprico LLC)	30-2009-001-0200		Owner
The Graham Companies	30-2009-001-0240		Contractor for Purchase
The Graham Companies	30-2009-001-0241		Contractor for Purchase
The Graham Companies	30-2009-001-0242		Contractor for Purchase
The Graham Companies	30-2009-001-0250		Contractor for Purchase
The Graham Companies	30-2009-001-0251		Contractor for Purchase
The Graham Companies	30-2009-001-0252		Contractor for Purchase
The Graham Companies	30-2009-001-0253		Contractor for Purchase
The Graham Companies	30-2009-001-0254		Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2009-001-0260		Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2009-001-0265		Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2009-001-0270		Contractor for Purchase
Tract 29 LLC	30-2009-001-0290		Contractor for Purchase
Portion: International Atlantic LLC Portion: State of Florida Department of Transportation	30-2009-001-0320		Owner Adjacent Owner

EXHIBIT B

THE GRAHAM COMPANIES STOCKHOLDERS
RECORD DATE NOVEMBER 18, 2015

	A		B		TOTAL	
	SHARES	%	SHARES	%	SHARES	%
WILLIAM A GRAHAM FAMILY						
CGW & EGM, Co-Tees of the PCG Rev Trust w/d dtd 3/25/94	-	-	89,108.3944	9.79	89,108.3944	8.5017
CGW & EGM, Co-Tees, fbo Marital Trust, dtd 3/25/94	26,026.1000	18.92	34,922.2000	3.84	60,948.3000	5.8150
CDY, tee, SG Younts Family Trust, fbo CD Younts, dtd 3/3/2010	-	-	2,047.8000	0.22	2,047.8000	0.1954
SS WYLLIE, Tee, WEG Rev Tr dated 3/25/99	-	-	-	-	-	-
CAROL G. WYLLIE	24,760.0000	0.02	179.5400	0.02	204.3000	0.0195
CAROL G. WYLLIE 2012 Family Trust Agreement	9,000.0000	6.54	38,810.8200	4.26	47,810.8200	4.5616
GRAHAM-WYLLIE Family Trust Agreement	-	-	9,190.7700	1.01	9,190.7700	0.8769
CYNTHIA G. GORDON	6,815.0000	4.95	24,723.1027	2.72	31,538.1027	3.0290
CGW, tee, Gordon Family Irrev Trust fbo KP GORDON, dtd 12/19/12	-	-	4,595.3800	0.50	4,595.3800	0.4384
CGW, tee, Gordon Family Irrev Trust fbo LVV GORDON, dtd 12/19/12	-	-	4,595.3800	0.50	4,595.3800	0.4384
ELIZABETH G. MARTINEZ	-	-	70.7954	0.01	70.7954	0.0068
ELIZABETH G. MARTINEZ 2012 Family Trust Agreement	6,405.9700	4.71	44,878.9200	4.93	51,362.8900	4.9005
GRAHAM-MARTINEZ Family Trust Agreement	-	-	12,232.9500	1.34	12,232.9500	1.1671
LUIS O. MARTINEZ	-	-	81.8713	0.01	81.8713	0.0078
LUIS O. MARTINEZ Family Trust	4,341.0000	3.15	8,587.8079	0.94	12,908.8079	1.2310
MICHAEL A. MARTINEZ	-	-	1,643.3800	0.18	1,643.3800	0.1568
DANIEL L. MARTINEZ	-	-	5,189.1400	0.57	5,189.1400	0.4950
KATHRYN N. MARTINEZ	-	-	1,643.3800	0.18	1,643.3800	0.1568
ALISON J. MARTINEZ	-	-	4,971.4200	0.55	4,971.4200	0.4743
STUART S. WYLLIE	-	-	139.9363	0.02	139.9363	0.0134
STUART WYLLIE 2012 Family Trust Agreement	5,295.7600	3.85	11,778.0000	1.29	17,073.7600	1.6290
BENJAMIN C. GORDON	4,341.0000	3.15	4,802.6792	0.53	9,143.6792	0.8724
KATHLEEN P. GORDON	-	-	1,643.3800	0.18	1,643.3800	0.1568
LEE W. GORDON	-	-	1,643.3800	0.18	1,643.3800	0.1568
TRACY F. GRAHAM	-	-	1,773.0000	0.19	1,773.0000	0.1692
ANDREA L. GRAHAM	1,630.4300	1.18	13,476.3800	1.48	15,106.8100	1.4413
AG RECHICHI, tee of Trust fbo AG RECHICHI ctd u/A VIII of WEG Tst	3,407.5000	2.48	15,962.8845	1.75	19,370.3845	1.8401
RECHICHI CHILDREN'S TRUST, fbo William M. Rechichi	-	-	187.1345	0.02	187.1345	0.0179
KRISTOPHER E. GRAHAM	-	-	11,206.0000	1.23	11,206.0000	1.0691
KE GRAHAM, tee of Trust fbo KE GRAHAM ctd u/A VIII of WEG Tst '99	3,407.5000	2.48	14,800.8845	1.60	18,008.3845	1.7182
EGM, Tee, L. E. WYLLIE TR u/a/d 8/4/93	815.2200	0.59	10,542.4972	1.16	11,357.7172	1.0836
LAURA E. WYLLIE	-	-	4,986.7600	0.55	4,986.7600	0.4768
EGM, Tee, P. S. WYLLIE TR u/a/d 8/4/93	815.2200	0.59	10,723.2872	1.18	11,538.5072	1.1009
PHILIP S. WYLLIE	-	-	4,805.9700	0.53	4,805.9700	0.4585
CGW, Tee, D. L. MARTINEZ TR u/a/d 12/30/93	1,873.1600	1.36	6,296.1683	0.69	8,169.3183	0.7704
CGW, Tee, A. J. MARTINEZ TR u/a/d 12/30/93	1,873.1600	1.38	6,523.8782	0.72	8,397.0382	0.8011
CGW, Tee, M. A. MARTINEZ TR u/a/d 12/30/93	688.8350	0.50	12,230.1348	1.34	12,918.9698	1.2326
CGW, Tee, K. N. MARTINEZ TR u/a/d 12/30/93	688.8350	0.50	12,230.1348	1.34	12,918.9698	1.2326
CGG, As Custodian for K. GORDON u/Co Unif Trs	1,902.1700	1.38	5,414.1348	0.59	7,316.3048	0.6980
CGG, Tee, L. W. GORDON TR u/a/d 10/16/92	543.4800	0.39	9,260.1348	1.02	9,803.6148	0.9353
JOAN G. GRAHAM	220.0000	0.16	1,785.0000	0.17	1,785.0000	0.1703
	80,195.1000	58.29	449,262.8000	49.34	529,447.9000	50.5138
D. ROBERT GRAHAM FAMILY						
D. ROBERT GRAHAM REVOC LIV TR 9/1/2000	28,718.5000	20.87	14,319.5434	1.57	43,038.0434	4.1062
ADELE K. GRAHAM REVOC LIV TR 9/1/2000	-	-	9,400.0000	1.03	9,400.0000	0.8968
GWENDOLYN GRAHAM	950.0000	0.59	46,058.7690	5.08	47,008.7690	4.4850
GWENDOLYN GRAHAM, Tee, MARK E. LOGAN TR	-	-	955.5599	0.10	955.5599	0.0912
GWENDOLYN GRAHAM, Tee, SARAH G. LOGAN TR	-	-	955.5602	0.10	955.5602	0.0912
GWENDOLYN GRAHAM, Tee, TIMOTHY G. LOGAN TR	-	-	955.5599	0.10	955.5599	0.0912
GLYNN B. McCULLOUGH	799.0000	0.58	35,561.0965	3.91	36,360.0965	3.4691
WILLIAM B. McCULLOUGH	-	-	2,723.3580	0.30	2,723.3580	0.2598
McCULLOUGH Family Trust fbo MELISSA G. McCULLOUGH	-	-	614.6951	0.07	614.6951	0.0586
McCULLOUGH Family Trust fbo WILLIAM G. McCULLOUGH	-	-	614.6951	0.07	614.6951	0.0586
McCULLOUGH Family Trust fbo CAROLINE A. McCULLOUGH	-	-	614.6947	0.07	614.6947	0.0586
ARVA G. GIBSON	950.0000	0.69	38,846.6000	4.27	39,796.6000	3.7969
THOMAS C. GIBSON	-	-	832.0000	0.09	832.0000	0.0794
THOMAS C. GIBSON, Tee, Gift Trust KENDALL C. GIBSON	-	-	1,727.6698	0.19	1,727.6698	0.1648
THOMAS C. GIBSON, Tee, Gift Trust ANSLEY S. GIBSON	-	-	1,727.6696	0.19	1,727.6696	0.1648
THOMAS C. GIBSON, Tee, Gift Trust ADELE E. GIBSON	-	-	1,727.6698	0.19	1,727.6698	0.1648
KENDALL G. ELIAS	950.0000	0.69	46,842.6010	5.14	47,792.6010	4.5598
L. ROBERT ELIAS III	-	-	6,013.7604	0.66	6,013.7604	0.5738
L. ROBERT ELIAS III, tee, Peyton Elias Trust und Elias Children's Trust	-	-	1,040.2488	0.11	1,040.2488	0.0992
L. ROBERT ELIAS III, tee, Lewis R. Elias Trust und Elias Children's Trust	-	-	1,040.2488	0.11	1,040.2488	0.0992
	32,367.5000	23.52	212,572.0000	23.35	244,939.5000	23.3693
PHILIP L. GRAHAM FAMILY						
DONALD E. GRAHAM	7,222.3000	5.25	75,458.3000	8.29	82,680.6000	7.8894
WILLIAM W. GRAHAM, Tee, WWG 1969 Revoc Trust	8,472.2000	6.16	86,708.3000	9.52	95,180.5000	9.0810
STEPHEN M. GRAHAM	2,222.2000	1.62	30,458.4000	3.35	32,680.6000	3.1180
	17,916.7000	13.02	192,625.0000	21.16	210,541.7000	20.0874
MARY GRAHAM CROW FAMILY						
PHILIP G. CROW	-	-	3,251.7000	0.36	3,251.7000	0.3102
MARY YORK BEHNCKE	-	-	2,790.0000	0.31	2,790.0000	0.2662
	-	-	6,041.7000	0.66	6,041.7000	0.5764
FREDERICK S. BEEBE FAMILY						
WALTER H. BEEBE	751.0000	0.55	13,599.0000	1.54	14,750.0000	1.4073
MICHAEL BEEBE	596.0000	0.43	6,170.0000	0.68	6,766.0000	0.6455
	1,347.0000	0.98	20,169.0000	2.22	21,516.0000	2.0528
GERALD E. TOMS FAMILY						
THOMAS N. TOMS II	1,456.0000	1.06	9,949.8000	1.09	11,405.8000	1.0882
LOUIS B. TOMS	1,419.7000	1.03	9,733.3000	1.07	11,153.0000	1.0641
ELIZABETH T. BRINEGAR	1,413.0000	1.03	4,878.3000	0.54	6,291.3000	0.6002
MARGARET TOMS	1,479.0000	1.07	5,309.7000	0.58	6,788.7000	0.6477
	5,767.7000	4.19	29,871.1000	3.28	35,638.8000	3.4022
TOTAL SHARES OUTSTANDING	137,694.0000	100.00	910,531.6000	100.00	1,048,125.6000	100.0000
TREASURY STOCK	91,677.1000		1,154,697.3000		1,246,374.4000	
TOTAL SHARES AUTHORIZED	229,471.1000		2,065,228.9000		2,294,700.0000	

EXHIBIT C

Attachments



Exhibit C
LOCATION MAP FOR APPLICATION
TO AMEND THE COMPREHENSIVE DEVELOPMENT MASTER PLAN

Applicant: International Atlantic, LLC
One Meadowlands Plaza, 6th Floor
East Rutherford, NJ 07073
P: (201)340-2900

Representatives:

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(305) 675-3296
eruiz@arnstein.com

Description of Subject Area:

The Subject Property Consists of approximately 194.5 Acres located in Sections 8 and 9, Township 52, Range 40 of unincorporated Miami-Dade County, Florida. More specifically, the Property is located east of the Homestead Extension of Florida's Turnpike ("HEFT") and west of Interstate 75 ("I-75") between NW 178 Street and the intersection of I-75 and HEFT. The property is more accurately described as:

"Commence at the southeast corner of the southwest 1/4 of said section 9; thence south 89 degrees 28 minutes 37 seconds west, along the south line of the said southwest 1/4 of said section 9, for 2641.25 feet to the southwest corner of said section 9; said corner also being the southeast corner of said section 9; said corner also being the southeast corner of said section 8; thence south 89 degrees 41 minutes 50 seconds west, along the south line of said section 8, for 5284.61 feet to the southwest corner of said section 8; thence north 02 degrees 37 minutes 33 seconds west, along the west line of the said southwest 1/4 of said section 8, for 347.26 feet to a point on the next described circular curve; said point bears north 57 degrees 41 minutes 53 seconds west from the radius point of the following described circular curve; thence northeasterly, along said circular curve to the right, having a radius of 4365.35 feet and a central angle of 15 degrees 09 minutes 34 seconds for an arc distance of 1154.99 feet to a point of tangency; thence north 47 degrees 27 minutes 37 seconds east for 2533.53 feet to the point of beginning of the following described parcel: said last described three courses being coincident with the southeasterly limited access right-of-way line of state road no. 821 (homestead extension of the Florida Turnpike), as shown on the state of Florida Department of Transportation right-of-way map section 87005 contract 2313 approved September, 1970, last revised November 1, 1971 (sheets 1 through 5); thence continue north 47 degrees 27 minutes 37 seconds east, along the last described course, for 4842.88 feet; thence north 89 degrees 37 minutes 09 seconds east for 217.37 feet; thence south 00 degrees 22 minutes 51 seconds east

AMERICAN DREAM MIAMI

for 897.56 feet; thence north 89 degrees 37 minutes 09 seconds east for 839.46 feet; thence south 00 degrees 36 minutes 44 seconds east for 2188.91 feet; said last described four courses being coincident with the westerly right-of-way line of Interstate 75 (state road 93) as shown on the State of Florida Department of Transportation right-of-way map section 87075-2402 approved July 5, 1977, last revised December 1, 1978 (sheets 1 through 10); thence south 89 degrees 37 minutes 45 seconds west for 4732.01 feet to the point of beginning; all lying and being in Miami-Dade county, Florida”

The ownership of the properties applicant are demonstrated in the following map and table of ownership.

Exhibit C



EXHIBIT D

Attachments



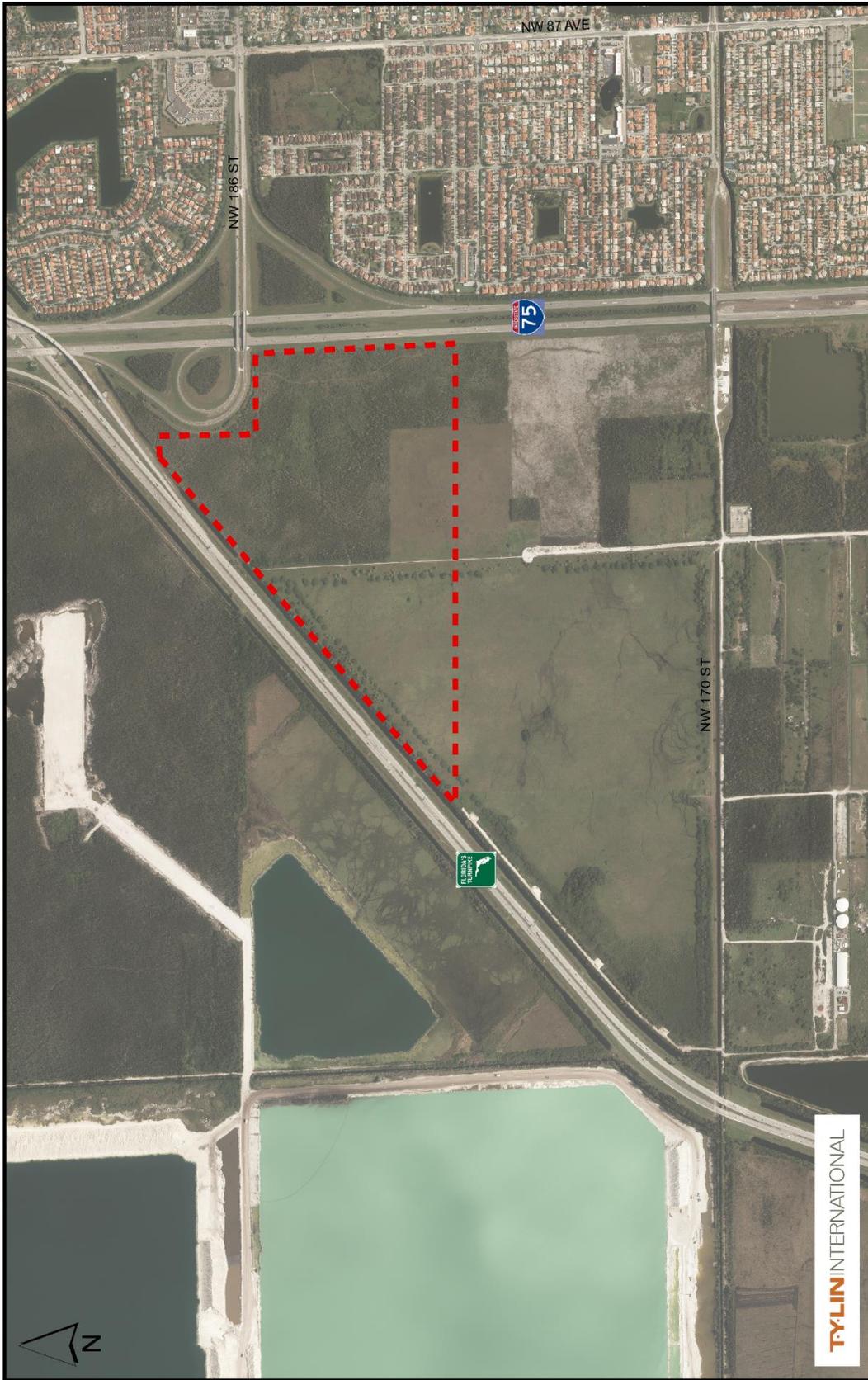


Exhibit D
Aerial Map (2015)
American Dream Miami
October 2015

Legend
Site Boundary

EXHIBIT E

Attachments





Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri, Japari, METI, Esri, China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Legend

-  Site Boundary
-  Public Land Survey System

Exhibit E
Section Sheet
American Dream Miami
October 2015

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Additional Material

Responses to Pertinent ADA Questions

1. Question No. 5 – Development Information
2. Question No. 8 – Permit Information
3. Question No. 9 – Maps
4. Question No. 10 – General Project Description
5. Question No. 11 – Revenue Generation Summary
6. Question No. 12 – Vegetation and Wildlife
7. Question No. 13 – Wetlands
8. Question No. 14 – Water
9. Question No. 15 – Soils
10. Question No. 16 - Floodplain
11. Question No. 17 – Water Supply
12. Question No. 18 – Wastewater Management
13. Question No. 19 – Stormwater Management
14. Question No. 20 – Solid Waste
15. Question No. 21 – Traffic **(To be Submitted 12-15-15)**
16. Question No. 22 – Air Impacts **(To be Completed 12-15-15)**
17. Question No. 23 – Hurricane Preparedness **(To be Completed 12-15-15)**
18. Question No. 25 – Police and Fire Protection
19. Question No. 29 – Energy
20. Question No. 30 – Historical and Archaeological Sites
21. Question No. 32 – Attractions and Recreation **(To be Submitted 12-15-15)**

Additional Material

QUESTION 5 - DEVELOPMENT INFORMATION

5. Attach a legal description of the development site. Include section, township and range.

A portion of tracts 19 through 23, inclusive, of the southwest 1/4 of section 4, township 52 south, range 40 east; together with a portion of tracts 1, 2, 3, 8, 9, 10, 11 and 18 through 24, inclusive, and all of tracts 4, 5, 6 and 7, of the northeast 1/4 of section 8, township 52 south, range 40 east; also together with that portion of the 10 foot wide right-of-way lying within the limits of the herein described parcel, all according to the plat of "chambers land company subdivision", recorded in plat book 2, at page 68; also together with a portion of tracts 17 through 25, inclusive, and tract 32, and all of tracts 26 through 31, inclusive, of the northwest 1/4 of section 9, township 52 south, range 40 east; also subject to that portion of the 15 foot wide road reservation lying within the limits of the herein described parcel, according to the plat of "Florida Fruit Lands Company's subdivision no. 1", as recorded in plat book 2 at page 17, all of the public records of Miami-Dade county, Florida, being more particularly described as follows:

Commence at the southeast corner of the southwest 1/4 of said section 9; thence south 89 degrees 28 minutes 37 seconds west, along the south line of the said southwest 1/4 of said section 9, for 2641.25 feet to the southwest corner of said section 9; said corner also being the southeast corner of said section 9; said corner also being the southeast corner of said section 8; thence south 89 degrees 41 minutes 50 seconds west, along the south line of said section 8, for 5284.61 feet to the southwest corner of said section 8; thence north 02 degrees 37 minutes 33 seconds west, along the west line of the said southwest 1/4 of said section 8, for 347.26 feet to a point on the next described circular curve; said point bears north 57 degrees 41 minutes 53 seconds west from the radius point of the following described circular curve; thence northeasterly, along said circular curve to the right, having a radius of 4365.35 feet and a central angle of 15 degrees 09 minutes 34 seconds for an arc distance of 1154.99 feet to a point of tangency; thence north 47 degrees 27 minutes 37 seconds east for 2533.53 feet to the point of beginning of the following described parcel: said last described three courses being coincident with the southeasterly limited access right-of-way line of state road no. 821 (homestead extension of the Florida Turnpike), as shown on the state of Florida Department of Transportation right-of-way map section 87005 contract 2313 approved September, 1970, last revised November 1, 1971 (sheets 1 through 5); thence continue north 47 degrees 27 minutes 37 seconds east, along the last described course, for 4842.88 feet; thence north 89 degrees 37 minutes 09 seconds east for 217.37 feet; thence south 00 degrees 22 minutes 51 seconds east for 897.56 feet; thence north 89 degrees 37 minutes 09 seconds east for 839.46 feet; thence south 00 degrees 36 minutes 44 seconds east for 2188.91 feet; said last described four courses being coincident with the westerly right-of-way line of Interstate 75 (state road

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93) as shown on the State of Florida Department of Transportation right-of-way map section 87075-2402 approved July 5, 1977, last revised December 1, 1978 (sheets 1 through 10); thence south 89 degrees 37 minutes 45 seconds west for 4732.01 feet to the point of beginning; all lying and being in Miami-Dade county, Florida

Refer to Exhibit 5-1 for the legal description and boundary survey of the aforementioned property.

QUESTION 8 - PERMIT INFORMATION

8. List all agencies (local, state and federal) from which approval and/or a permit must be obtained prior to initiation of development. Indicate the permit or approval for each agency and its status. Indicate whether the development is registered or whether registration will be required with the Division of Florida Land Sales, Condominiums and Mobile Homes under Chapter 478, Florida Statutes. Indicate whether the development will be registered with the H.U.D., Division of Interstate Land Sales Registration or with other states.

The Applicant will obtain any and all necessary permits. Currently, the Applicant anticipates obtaining the following permits, which will be obtained prior to the initiation of the development, as required.

Agency	Permit/Approval	Status
Miami-Dade County	CDMP Amendment	Future Action
	Re-zoning	Future Action
	Site Plan Approval	Future Action
	Plat Approval	Future Action
	Building Permit(s)	Future Action
	Wastewater Collection System Permit	Future Action
	Roadway Improvement Plans	If Required
	Tree Removal Permit	If Required
	Water Distribution System Permit	Future Action
	Complex Source Permit	If Required
	Wetland Jurisdictional Determination	In Process
	Class IV (Freshwater Wetland Dredge & Fill)	Future Action
	Surface Water Management Permit	Future Action (if not issued by SFWMD)
State of Florida		
South Florida Regional Planning Council	CDMP Amendment	Future Action
South Florida Water Management District	Wetland Jurisdictional Determination	In Process
	Environmental Resource Permit (Stormwater and Water Quality Certification)	Future Action (if not issued by DERM)

AMERICAN DREAM MIAMI

Agency	Permit/Approval	Status
	Water Use Permit	If Required
Department of Economic Opportunity	CDMP Amendment Review	In Process
Department of Environmental Protection	Wastewater Collection System Permit	Future Action
	Water Distribution System Permit	Future Action
	Air Quality	Future Action
Department of Transportation	Roadway Improvement Plans	If Required
Federal		
U.S. Army Corps of Engineers	Wetland Jurisdictional Determination	Future Action
	Dredge and Fill Permit	Future Action

At this time, registration of the development as currently proposed with the Division of Florida Land Sales, Condominiums, and Mobile Homes under Chapter 498, Florida Statutes, will not be required. The development will not be registered with H.U.D. Division of Interstate Land Sales registration or with other state agencies.

PART II. GENERAL SECTION

QUESTION 9 - MAPS

The following maps are provided by the Applicant as a part of the CDMP Application. The appropriate scale for each map should be determined at the preapplication conference.

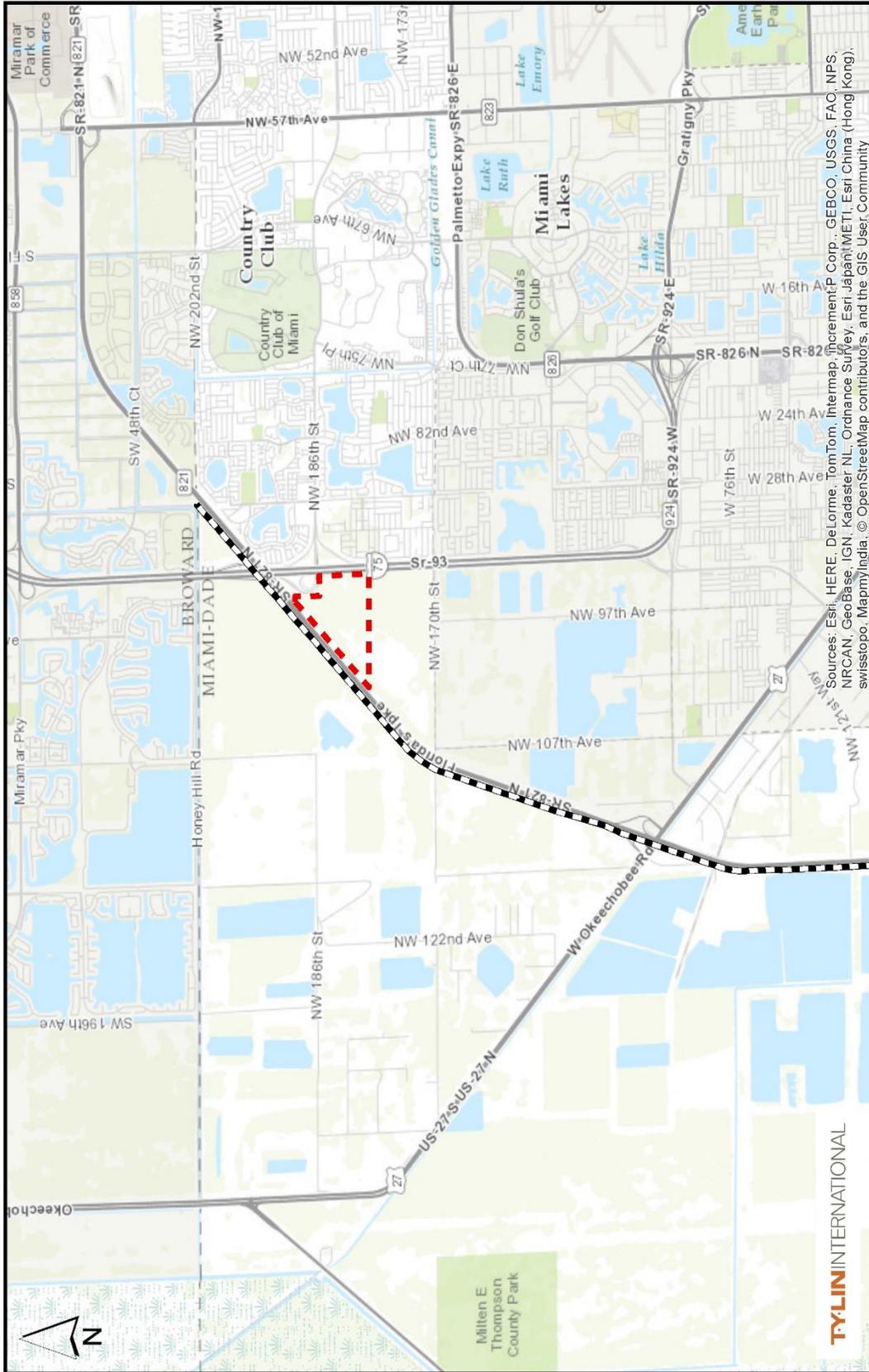
- Map A. A general location map. Indicate the location of any urban service area boundaries and regional activity centers in relation to the project site.
- Map B. A recent vertical aerial photo of the site showing project boundaries which reasonably reflects current conditions. Specify the date the photo was taken.
- Map C. A topographic map with project boundaries identified (contour intervals from one to five feet should be determined in consultation with the appropriate regional planning council and other reviewing agencies at the preapplication conference). Delineate 100-year flood prone areas (including hurricane flood zones) and indicate major land surface features. If applicable, delineate the coastal construction control line.
- Map D. A land use map showing existing and approved uses on and abutting the site. The uses shown should include existing on-site land uses, recreational areas, utility and drainage easements, wells, right-of-way, and historic, archaeological, scientific and architecturally significant resources and lands held for conservation purposes.
- Map E. A soils map of the site, with an identification of the source of the information. The use of a source other than the most recently published U.S.D.A. Soil Conservation Service (SCS) soil surveys should be determined in consultation with the appropriate regional planning council and other reviewing agencies at the preapplication conference.
- Map F. A vegetation associations map indicating the total acreage of each association, based on the Level III vegetation types described in The Florida Land Use and Cover Classification System: A Technical Report, available from each regional planning council.
- Map G. A location map of all transects, trap grids, or other sampling stations used to determine the on-site status of significant wildlife and plant resources. Show location of all observed significant wildlife and plant resources, and show location of suitable habitat for all significant resources expected to be on-site.
- Map H. A master development plan for the site. Indicate proposed land uses and locations, development phasing, major public facilities, utilities, preservation

areas, easements, right-of-way, roads, and other significant elements such as transit stops, pedestrian ways, etc. This plan will provide the basis for discussion in Question 10-A as well as other questions in the ADA.

Map I. A master drainage plan for the site. Delineate existing and proposed: drainage basins, flow direction, water retention areas, drainage structures, flow route offsite, drainage easements, waterways, and other major drainage features. (This information may be presented on two separate maps (existing and proposed), if desired.)

Map J. A map of the existing highway and transportation network within the study area. The study area includes the site, and locations of all transportation facilities which are substantially impacted. This area should be finally defined on the basis of the findings of the traffic impact analysis, including determinations of where the criteria for a substantial impact are met. Map J will become the base for the maps requested in Question 21.

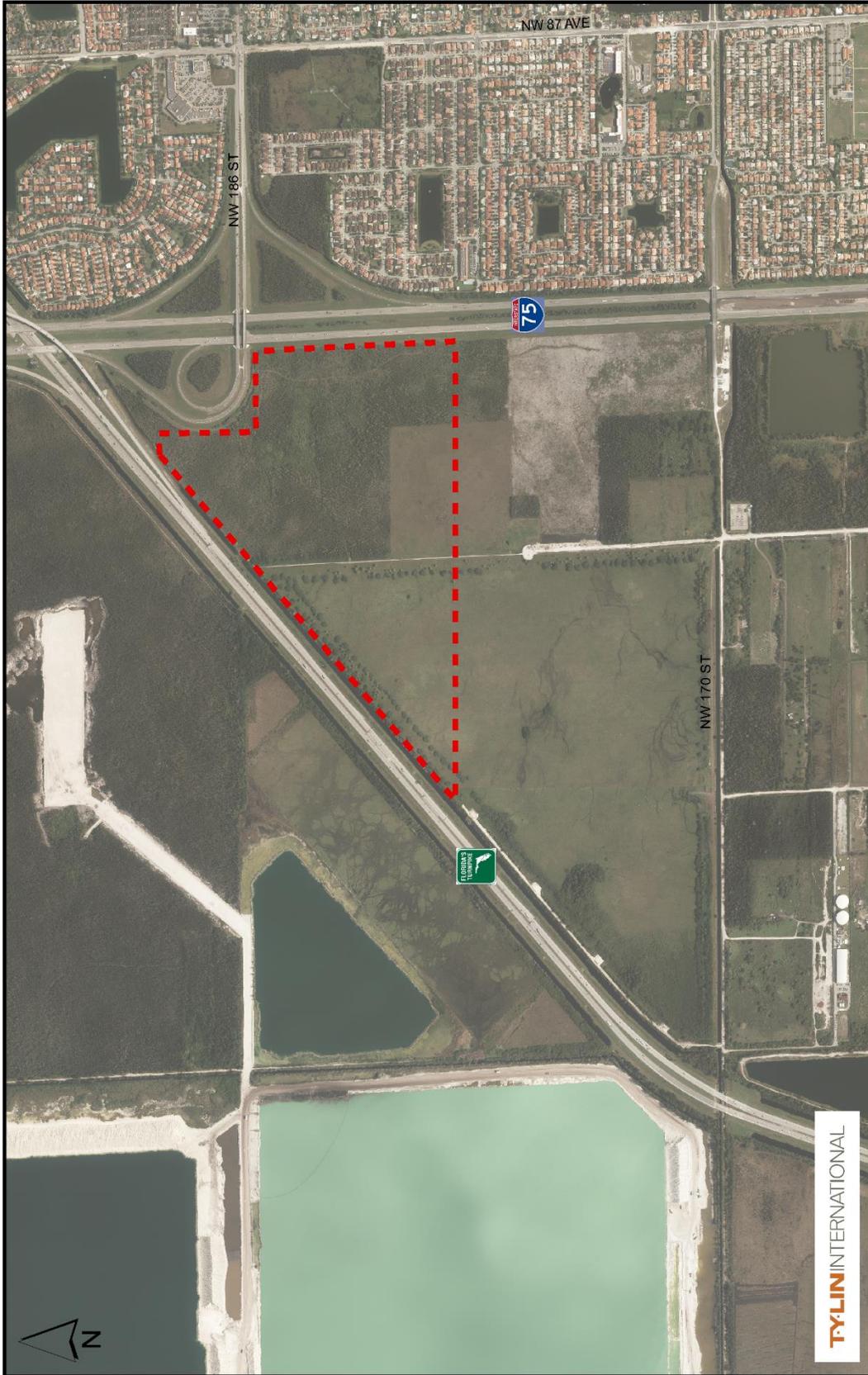
Attached please find Exhibits Map A through Map J



Legend

- 2015 Urban Development Boundary
- Site Boundary

Map A
Site Location Map
American Dream Miami
October 2015



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Map B
Aerial Map (2015)
American Dream Miami
October 2015

Legend
Site Boundary

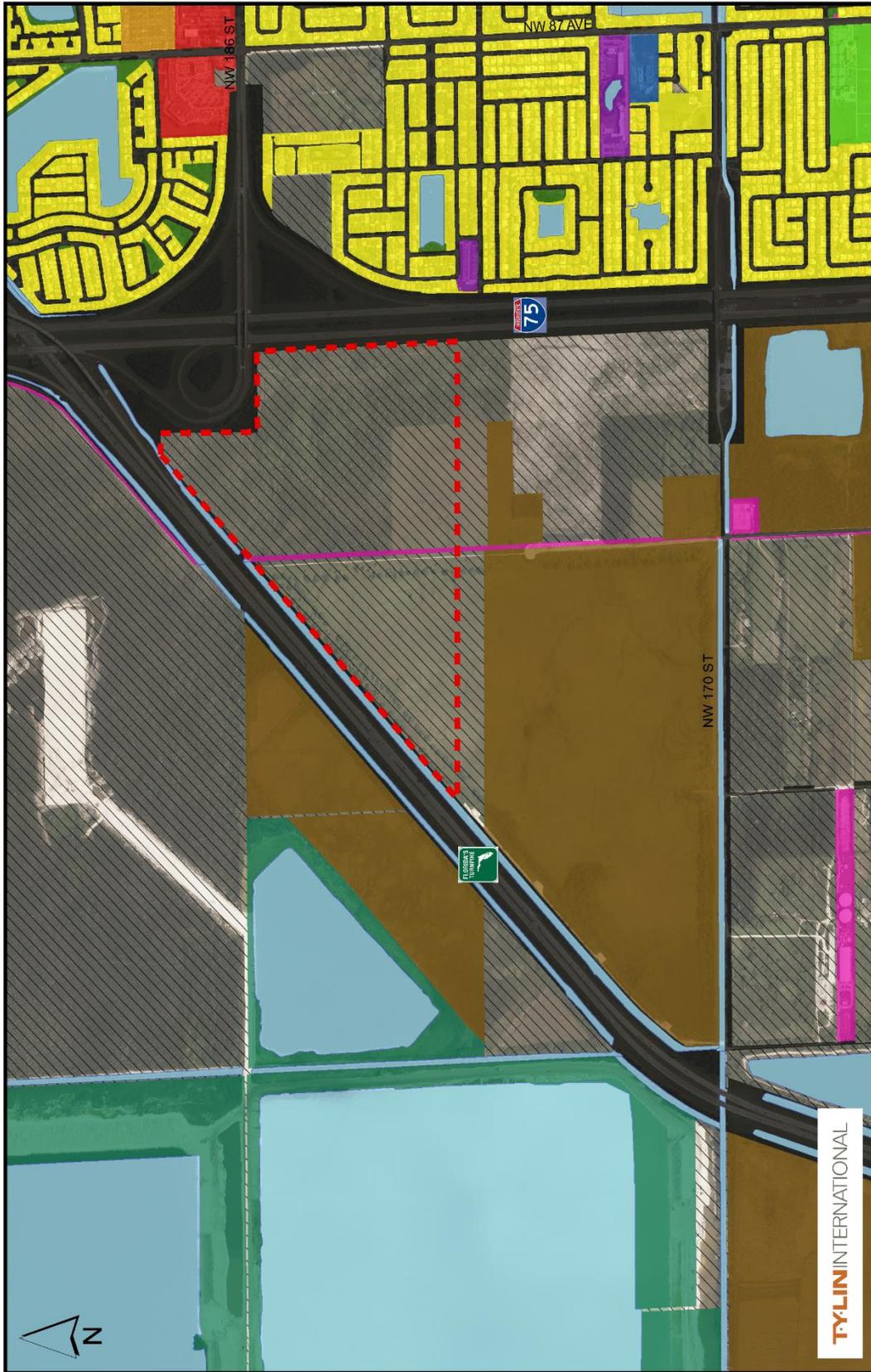


Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, Geobase, GN, Kadaster NL, Ordnance Survey, Esri, Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

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Map C
Topographic Map
American Dream
October 2015

Legend
Site Boundary



Map D-1
Existing Land Use Map
American Dream Miami
October 2015

Source: Miami-Dade County GIS Self Services

	Site Boundary		Agricultural		Private School		Utilities
	Existing Land Use		Multi-Family		Municipal Park		Vacant
	Single Family		Sales and Services		Private Recreation		Transportation
	House of Worship		House of Worship		Water Bodies		Water Bodies

Legend

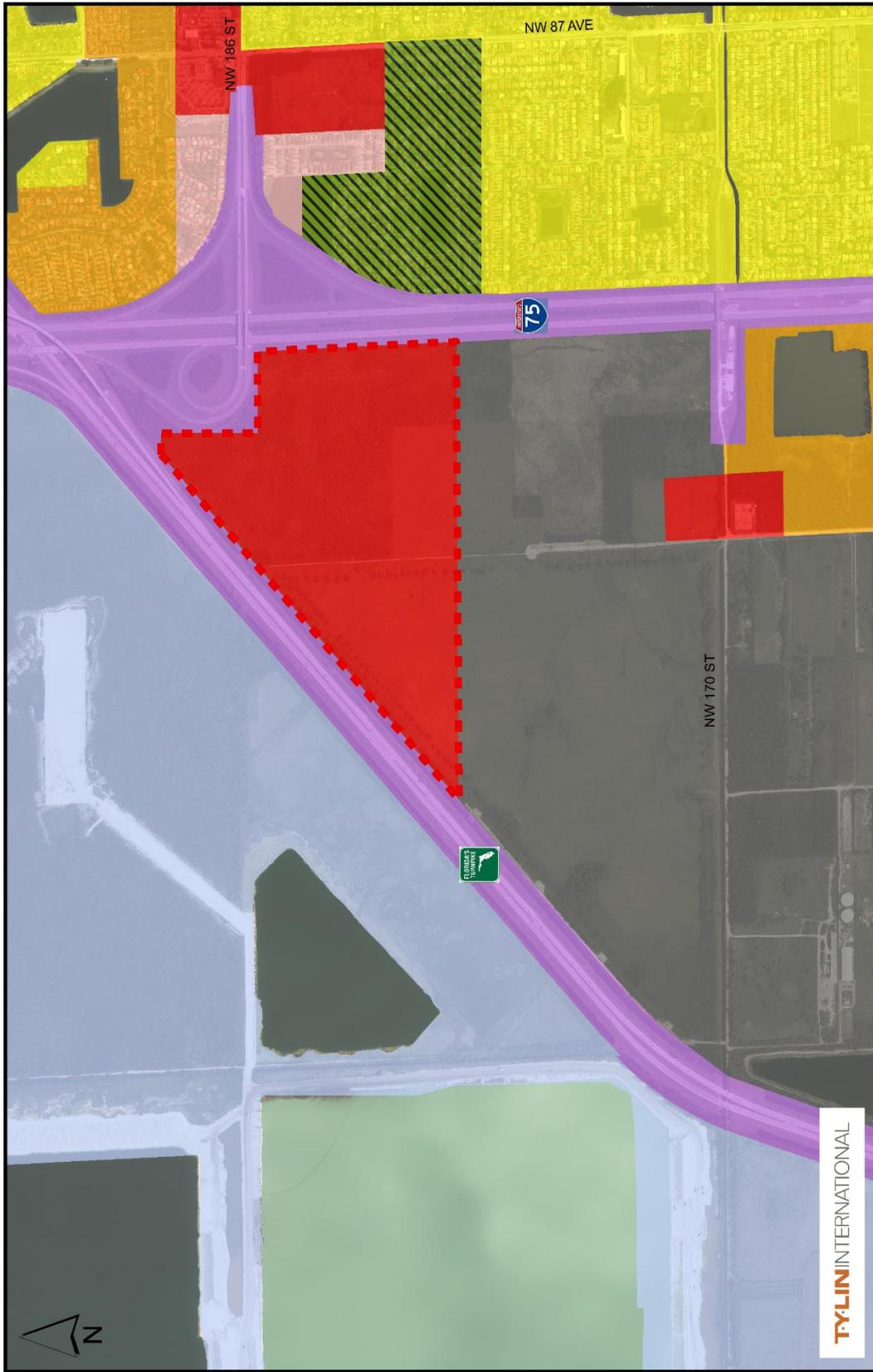
TYLIN INTERNATIONAL



Map D-2
Adopted Future Land Use Map
American Dream Miami
October 2015

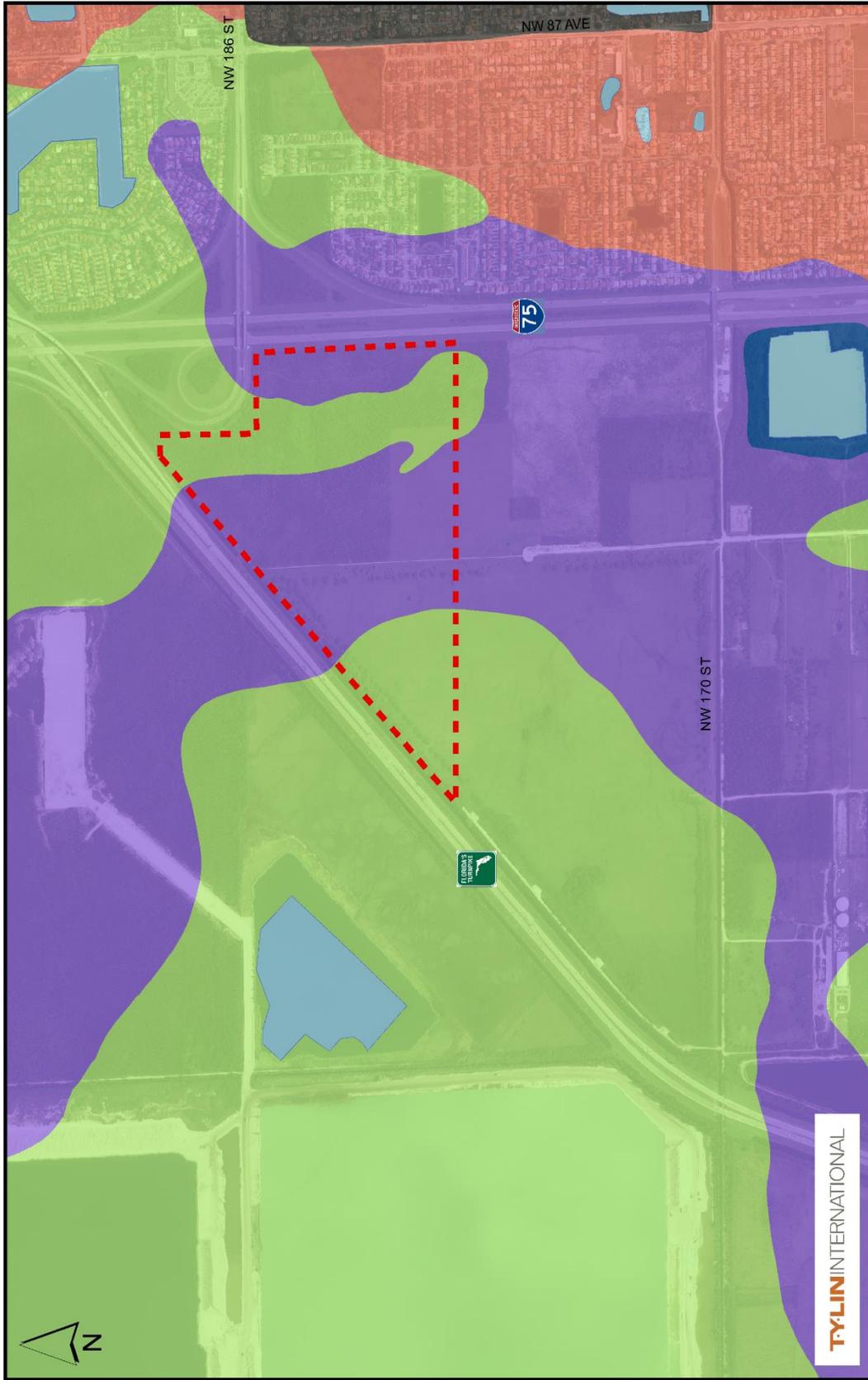
Legend Source: Adopted 2020-2030 Miami-Dade County Comprehensive Development Master Plan

- ▬ Site Boundary
- ▬ Future Land Use
- LOW-MEDIUM DENSITY RESIDENTIAL (LMDR) 6-13 DUJAC
- INDUSTRIAL AND OFFICE
- BUSINESS AND OFFICE
- ESTATE DENSITY RESIDENTIAL (ONE DENSITY INCREASE)
- LOW DENSITY RESIDENTIAL (LDR) 2.5-6 DUJAC
- OFFICE/RESIDENTIAL
- OPEN LAND
- TRANSPORTATION (ROW, RAIL, METRO RAIL, ETC.)



Map D-3
Proposed Future Land Use Map
American Dream Miami
October 2015

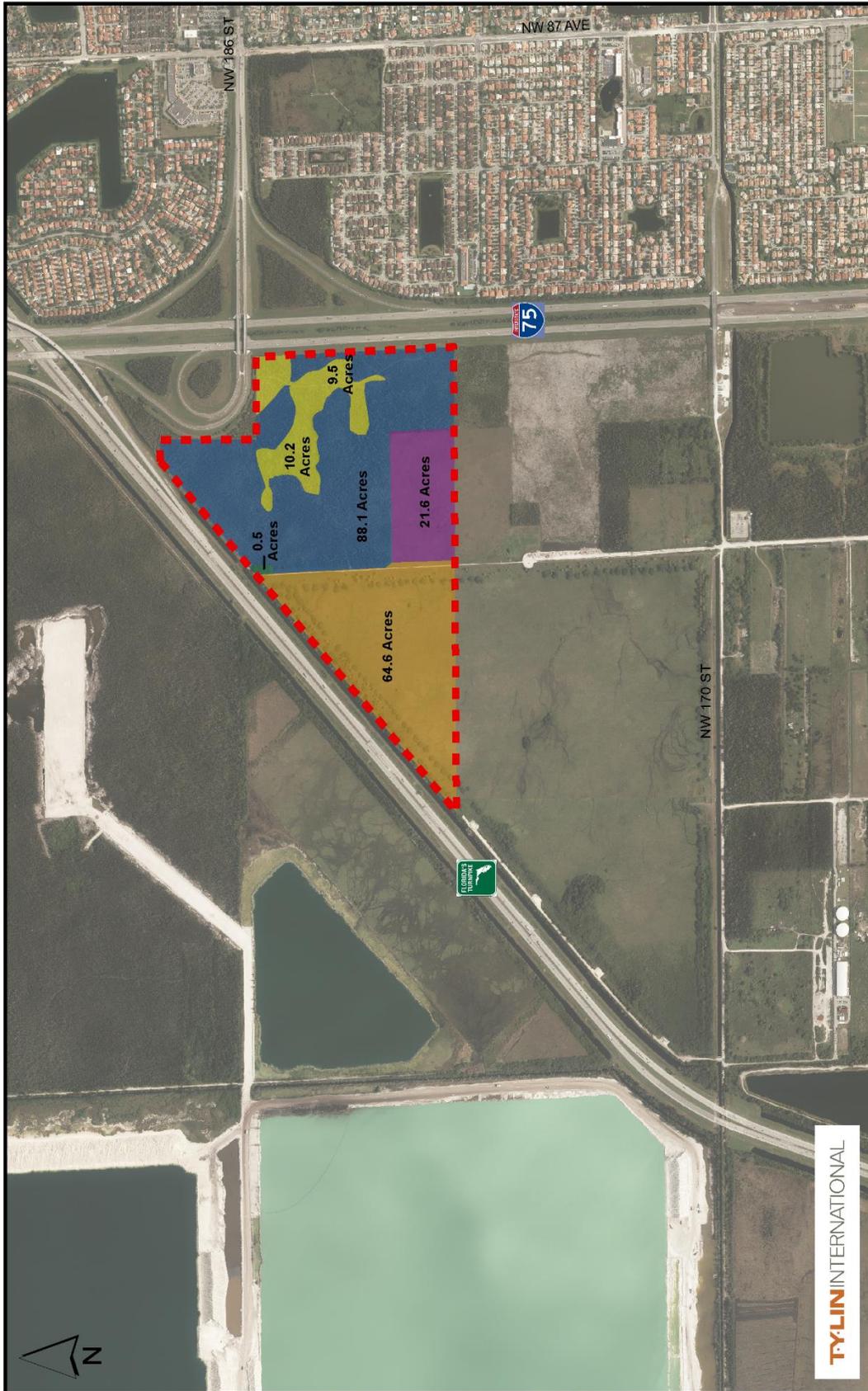
	Site Boundary		TRANSPORTATION (ROW, RAIL, METRO RAIL, ETC.)
	LOW DENSITY RESIDENTIAL (LDR) 2.5-6 DU/AC		BUSINESS AND OFFICE
	LOW-MEDIUM DENSITY RESIDENTIAL (LMDR) 6-13 DU/AC		OFFICE/RESIDENTIAL
	ESTATE DENSITY RESIDENTIAL (ONE DENSITY INCREASE)		OPEN LAND
			



Map E
Soils
American Dream Miami
October 2015

- Legend** Source: Natural Resources Conservation Service, 2012
- Site Boundary
 - LAUDERHILL MUCK, DEPRESSIONAL
 - PLANTATION MUCK
 - UDORTHENTS-WATER COMPLEX
 - DANIA MUCK, DEPRESSIONAL
 - URBAN LAND
 - WATER

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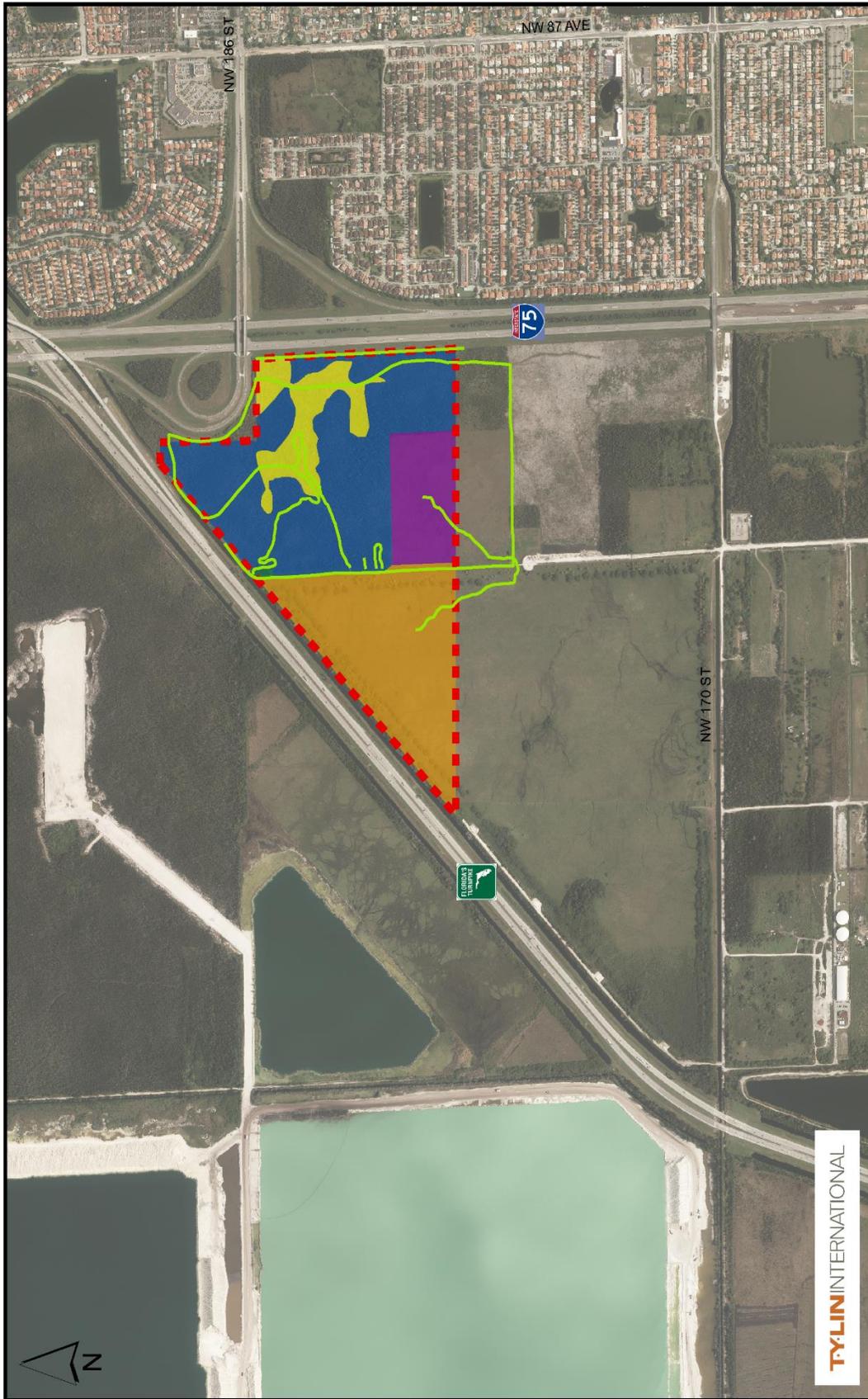


Map F
Vegetation
American Dream Miami
October 2015

Source: TY Lin International, Oct. 2015

Legend

- Site Boundary
- 439 OTHER HARDWOODS
- 619 EXOTIC WETLAND HARDWOODS
- 641 FRESHWATER MARSHES
- 617 MIXED WETLAND HARDWOODS
- 211 IMPROVED PASTURES
- 631 WETLAND SCRUB

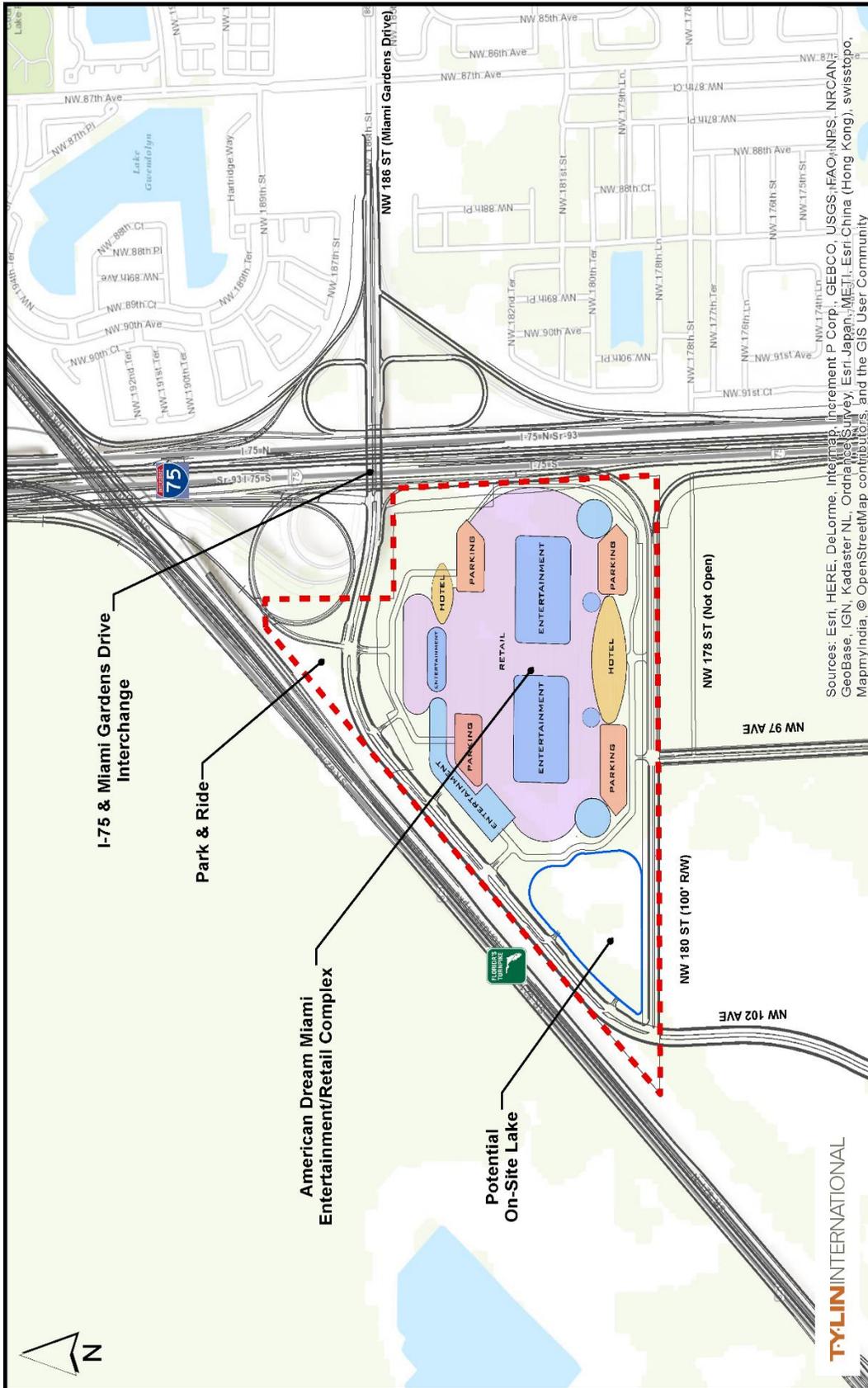


TYLIN INTERNATIONAL

Map G
Transects Map
American Dream Miami
October 2015

Source: Ty Lin International, Oct. 2015

Vegetation	211 IMPROVED PASTURES	619 EXOTIC WETLAND HARDWOODS
Walking Transects	439 OTHER HARDWOODS	631 WETLAND SCRUB
Site Boundary	617 MIXED WETLAND HARDWOODS	641 FRESHWATER MARSHES



Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, INRS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Map H
Master Development Plan
American Dream
October 2015

Legend
 Site Boundary

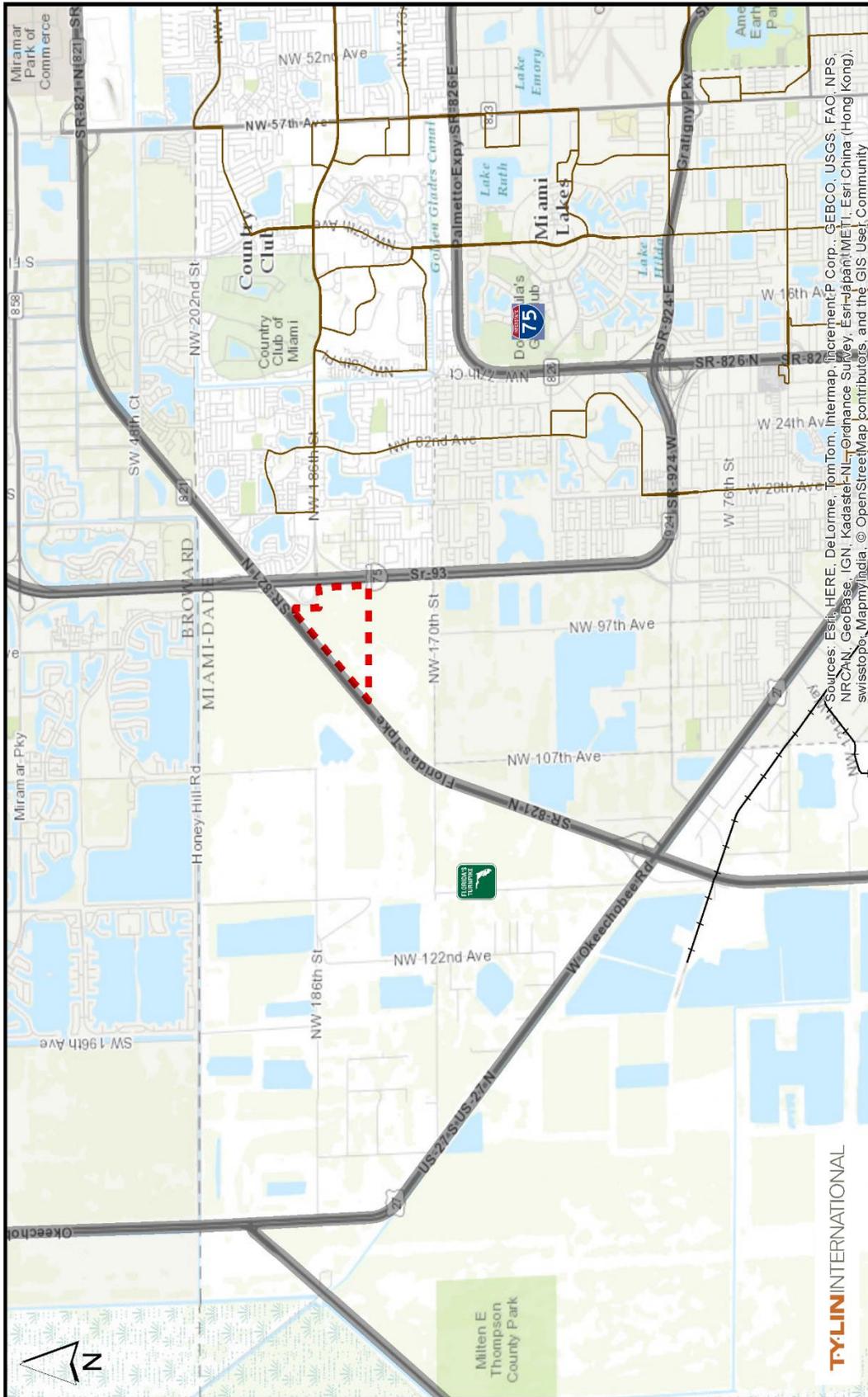


Map I
Floodplains
American Dream Miami
October 2015

Legend Source: Federal Emergency Management Agency, 2013

	Western C-9 Basin Limit	Floodplain		100yr Floodplain Zone AH	
	Potential On-Site Lake		100yr Floodplain Zone A		Outside Floodplain Zone X
	Site Boundary		100yr Floodplain Zone AE		

TYLININTERNATIONAL



Legend

- Existing Railway
- Existing Intra-state Highway System
- Existing Bus Route
- Site Boundary

Map J
Existing Highway and Transportation Network
American Dream Miami
October 2015

QUESTION 10 - GENERAL PROJECT DESCRIPTION

Part 1 Specific Project Description

- A. Describe and discuss in general terms all major elements of the proposed development in its completed form. Include in this discussion the proposed phases (or stages) of development (not to exceed five years), magnitude in the appropriate units from Chapter 28-24, F.A.C., where applicable, and expected beginning and completion dates for construction.**

The American Dream Miami development is proposed by International Atlantic LLC, whose principals are the owners and operators of the largest mixed use entertainment complexes in the world including Mall of America in Minneapolis, the West Edmonton Mall, and American Dream in the New York Metropolitan area. The Applicant and Developer for the project is International Atlantic LLC. This development is a large scale multi-faceted venue completely unique to South Florida. With a myriad of entertainment and retail uses housed in over 6M square feet including resort hotels, an amusement park, a water park, an indoor ski facility, a recreational lake, and a many other attractions, it is planned to be the largest facility of this kind in the United States. The development sits on a triangular 194.5 acre site on the southwest corner of the intersection of Interstate 75 and the Florida Turnpike in Miami-Dade County. This location makes it an ideal site for a regional attraction of this kind catering to local and regional shoppers and tourists in Florida and abroad.

The following table 10-1 contains a description of the planned program for the facility. **It should be noted that these figures are conceptual and that the final layouts for implementation are subject to change.**

Table 10-1 contains the overall program for development:

American Dream Miami Program	
1. Retail (sf)	3,500,000
2. Entertainment (sf)	1,500,000
3. Common Area/Back of House (sf)	1,200,000
Sub Total:	6,200,000
4. Hotel (rooms)	2,000

Table 10-1: Breakdown of Development Program.

The following figure 10-1 demonstrates the site location and the preliminary site layout (subject to change).

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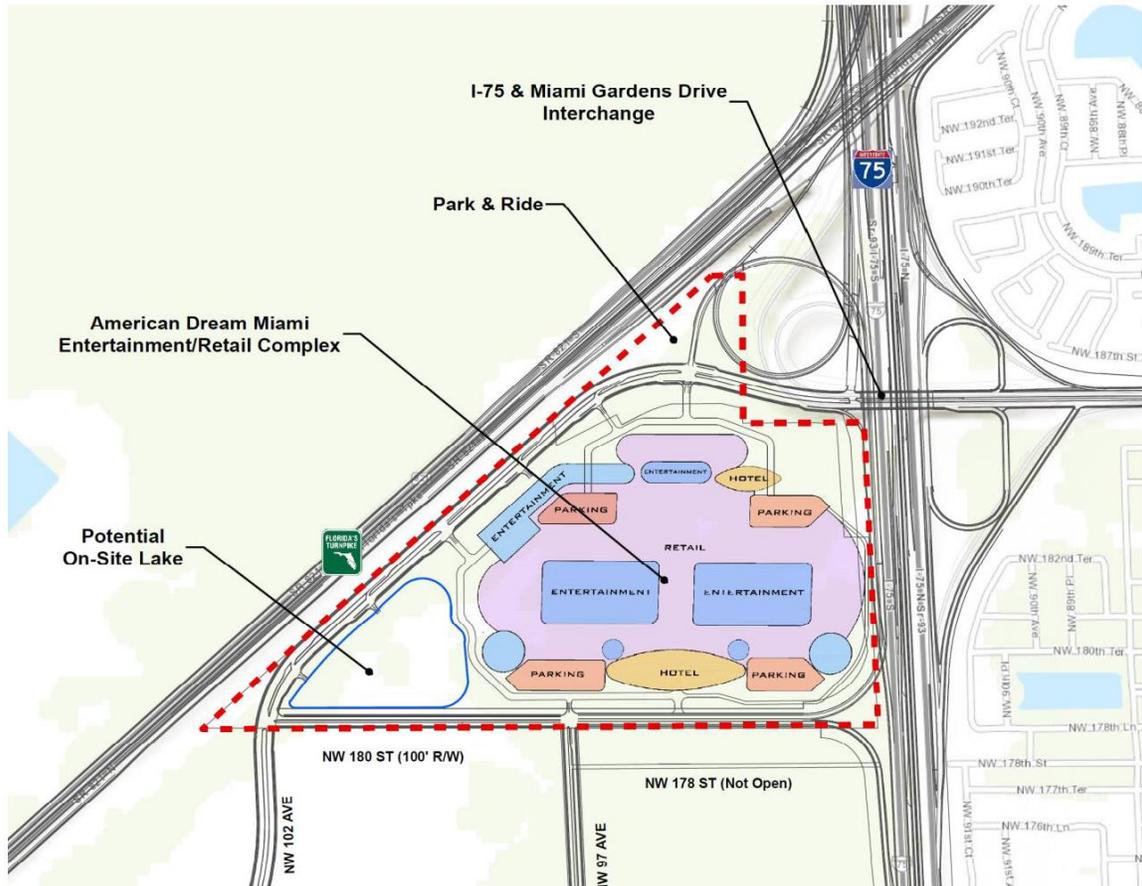


Figure 10-1: American Dream Miami Development Location

The development schedule is to begin construction permitting in 2016 and ground breaking anticipated for early 2017. The project is anticipated to be built in one phase as a complete facility and projected completion is late 2019.

- B. Provide a breakdown of the existing and proposed land uses on the site for each phase of development through completion of the project. The developed land uses should be those identified in Section 380.0651, F.S. and Chapter 28-24, F.A.C. Use Level III of The Florida Land Use and Cover Classification System: A Technical Report (September 1985), available from each regional planning council. Refer to Maps D (Existing Land Use) and H (Master Plan). Use the format below and treat each land use category as mutually exclusive unless otherwise agreed to at the preapplication conference.**

The existing land use on the site is “Vacant”, with “Agricultural” as the primary use on neighboring properties, see Map D. The approved future land use on the CDMP is “Industrial and Office”, see Map D2.

The proposed amendment will be to change the Land Use designation to “Business and Office” which allows for a development with the proposed characteristics, see map D3.

C. Briefly describe previous and existing activities on site. Identify any constraints or special planning considerations that these previous activities have with respect to the proposed development.

The site is currently vacant and used for minor agricultural uses in certain areas. No special planning considerations are anticipated nor are any constraints identified for the development with respect to previous activities.

D. If the development is proposed to contain a shopping center, describe the primary and secondary trade areas which the proposed shopping center will serve.

The development will contain approximately 3.5M square feet of retail shopping. The primary trade area that the proposed retail components of the project will serve are local and regional shoppers. Due to the size of this retail development, its proximity to the interstate and turnpike, and its location at the Miami-Dade and Broward Countyline, the primary trade area will encompass all of South Florida.

The secondary trade area are regional tourist traveling to Miami to this destination and others.

E. Describe, in general terms, how the demand for this project was determined.

The demand for this project are based upon a proprietary Market Study prepared by Goodkin Consulting in 2015 for the Applicant.



EXISTING AND PROPOSED LAND USES

PHASE	NON-RESIDENTIAL (Specify by CH 28-24 F.A.C. Land Use Type)		RESIDENTIAL				OTHER (Separate column for ROW, Open Space, Drainage, etc.)	TOTAL	
	ACRES (Approx., Site Plan under development)	GSF/UNITS	ACRES	D.U.	NET (1) DENSITY	GROSS(1) DENSITY	ACRES (Open Space, RW, Drainage, etc.)	ACRES	D.U./GSF
Existing (Vacant Land)	194.48	0	0	0	0	0	194.48	194.48	0
Proposed Project								194.48	
Retail (28-24.012 F.A.C.)	50	3,500,000 SF							
Entertainment (28-24.016 F.A.C.)	20	1,500,000 SF							
Common Area/Back of House (28-24.012 F.A.C.)	10	1,200,000 SF							
Hotel (28-24.026 F.A.C.)	7	2000 Units							
FDOT Transportation Dedication Area							23.29		
Open Space/ Parking/ Interior Roadways/ Drainage/ etc.							84.19		
Total								194.48	

(1) Definitions of net and gross densities to be provided at the preapplication conference

Part 2 Consistency with Comprehensive Plans

- A. Demonstrate how the proposed project is consistent with the local comprehensive plan and land development regulations. Indicate whether the proposed project will require an amendment to the adopted local comprehensive plan, including the capital improvements element. If so, please describe the necessary changes.**

Please refer to the CDMP Application Document.

- B. Describe how the proposed development will meet goals and policies contained in the appropriate Regional Comprehensive Policy Plan.**

Approval of the American Dream Miami will be consistent with the following goals and policies of the Strategic Regional Policy Plan for South Florida (SRPP):

- Goal 2 of the SRPP (page 24) encourages the increase of employment opportunities. American Dream Miami will increase employment opportunities for the nearby residential community and South Florida.
- Goal 4 of the SRPP (page 29) seeks to ensure the adequacy of public services and facilities. The Applicant understands that both water and sewer connections are available adjacent to the site. As to potable water, the Miami-Dade CDMP Amendments Planning Considerations Reports for the November 2014 and May 2015 Cycles state that all of the County's water treatment plants are currently operating within the LOS standards. This application should not have a significant impact. The same report addresses sewer capacity but warns that since some areas are at or close to capacity, DERM addresses the availability of water and sewer service on a case by case basis. Although the Applicant does not anticipate that the approval of this application will result in a deficiency in the LOS, the Applicant will work with DERM to address any potential concerns. In addition, the Applicant is coordinating with the Police and Fire Departments to ensure service to the development.
- Policy 11.2 of the SRPP (page 62) encourages development of mixed land uses and activities within communities to foster more balanced and energy-efficient development pattern, which are characterized by appropriate density, diverse economic, employment, and housing opportunities, and public transportation access. American Dream Miami will feature a well-integrated mix of entertainment, retail and hotels adjacent to a residential neighborhood that will create a more balanced and energy-efficient development pattern in this area of Miami-Dade County.

- Policy 12.3 of the SRPP (page 66) discourages the expansion of urban services into former agricultural areas except where the expansion is necessary to accommodate projected population growth and when the proposed densities will be sufficient to support public transportation. The Property was brought into the Urban Development Boundary in 2006. Development of the lands has been under consideration for the past 10 years. Development of the land will represent an orderly expansion of the urban pattern. American Dream Miami and the growth it precipitates will be of a sufficient density to support public transportation.
- Policy 12.4 of the SRPP (page 66) provides that, should land be converted from agriculture to urban uses, local governments should discourage sprawl patterns of development and require urban design and density necessary to support pedestrian-orientation, public transportation, and the efficient provision of other infrastructure. American Dream Miami has been designed in a manner that is dense, with a mixing of entertainment, retail, and resort hotels. The proposed development represents an orderly progression of the urban pattern. American Dream Miami will also employ current and future infrastructure in an efficient manner.

C. Describe how the proposed development will meet goals and policies contained in the State Comprehensive Plan (Chapter 187, F.S.), including, but not limited to, the goals addressing the following issues: housing, water resources, natural systems and recreational lands, land use, public facilities, transportation, and agriculture.

Approval of the American Dream Miami will be consistent with the following goals and policies of the State Comprehensive Plan:

- The Water Resources goal requires the continued availability of an adequate supply of water for all competing uses. The approval of the American Dream Miami will not have a measurable negative impact on the availability and quality of water resources in Miami-Dade County.
- The Natural Systems and Recreational Lands goal requires the protection of wetlands, tropical hardwood hammocks, etc. The American Dream Miami will not result in unmitigated damage to or the destruction of any of these important natural systems.
- The Land Use goal requires that developments shall be directed to areas that have in place, or have agreements to provide, the land and water resources, fiscal abilities, and service capacity to accommodate growth in an environmentally acceptable manner. The American Dream Miami is immediately adjacent to currently existing urban infrastructure and may require new infrastructure that

AMERICAN DREAM MIAMI

will be coordinated with the appropriate agencies. The development will not pose a risk to environmentally sensitive lands.

- The Transportation goal encourages the integration of various transportation modes. The American Dream Miami is located at the intersection of HEFT and I-75. These significant regional roadways will provide personal automobile and mass transit bus transportation opportunities.
- The Agriculture goal requires the State to maintain and encourage the continued health of the agriculture industry. The American Dream Miami property, located immediately adjacent to existing dense urban development, is not conducive to long-term agricultural uses.
- The Tourism goal seeks to support efforts to increase tourist-related economies. American Dream Miami is designed to serve the entertainment and retail needs of both South Florida residents and tourists.
- The Economy and Employment goals seek to maximize job opportunities. American Dream Miami will create a significant number of jobs.

Part 3 Demographic and Employment Information

Part 3 of Question 10 will be addressed under a needs and economic analysis performed by Miami Economics Associates, Inc. to be submitted on December 15, 2015.

A. Complete the following Demographic and Employment Information tables.

Demographic Information Related to the Project's Population

PHASE	TOTAL DWELLING UNITS		PERSONS PER HOUSEHOLD	TOTAL POPULATION	CHILDREN PERHOUSEH OLD	TOTAL SCHOOL AGE CHILDREN	ELDERLY PER HOUSEHOLD	TOTAL ELDERLY
	MF	SF						
Existing								
Phase 1								
.								
.								
.								
n								
TOTAL								

Estimated Employment Generated by Project by Income Range(1)

PHASE	UNDER \$10,000		\$10,000-\$14,999		\$15,000-\$19,999		\$20,000-\$24,999		\$25,000-\$29,999		\$30,000-\$34,999		\$35,000-\$39,999		Over \$40,000	
	CONSTR	NON-CONSTR	CONSTR	NON-CONSTR	CONSTR	NON-CONSTR	CONSTR	NON-CONSTR	CONSTR	NON-CONSTR	CONSTR	NON-CONSTR	CONSTR	NON-CONSTR	CONSTR	NON-CONSTR
Phase 1																
.																
.																
.																
n																
TOTAL																

(1) Construction employment in terms of Full-time equivalents (FTE)

Non-construction employment in terms of permanent employees



Part 4 Impact Summary

A. Summarize the impacts this project will have on natural resources.

Questions 12 to 16 address the projects impacts and mitigation strategies for addressing vegetation, wildlife, wetlands, water resources, soils, and floodplain considerations. At this time there are no net negative impacts anticipated.

B. Summarize public facility capital costs associated with project impacts using the following table:

PUBLIC FACILITY IMPACTS (1)

TABLE 10.6 PUBLIC FACILITIES CAPITAL COSTS		
Facility	Total Capital Costs	Responsible Entity
Transportation (External)	Fair Share cost to be determined	State of Florida, Miami-Dade County
Wastewater	Equal to connection charges collected.	Miami-Dade Water & Sewer
Potable Water		
Recreation/Open Space	None anticipated	Miami-Dade County
Education	None anticipated	Miami-Dade County Public Schools
Source: The Curtis Group		

QUESTION 11 - REVENUE GENERATION SUMMARY

- A. **Project the funds anticipated to be generated by the project. This projection should include any source or use of funds which could have any reasonable connection to the proposed development.**

Exhibit 11A attached included a revenue generation study performed by Munitytics dated October 5, 2015. The Subsequent questions are addressed in the study.

Additional information will be provided under a needs and economic analysis performed by Miami Economics Associates, Inc. to be submitted on December 15, 2015.

1. **Make the following projections by year, including the first and last year in which any construction and/or development takes place:**
 - (a) **Yearly ad valorem tax receipts**
 - (b) **Yearly impact fees collected**
 - (c) **Yearly sales tax received by local government**
 - (d) **Yearly gasoline tax received by local government**
 - (e) **Yearly projections of any other funds by any other sources generated as a result of development of the proposed project within the region**

2. **List all assumptions used to derive the above projections and estimates, show the methodologies used and describe the generally accepted accounting principles used in all assumptions, estimates and projections.**

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Exhibit 11-A

**Local Government Revenue Generation Analysis
American Dream Miami Proposed Mixed-Use
Development**

Miami Dade County, Florida

October 5, 2015



Report Commission

International Atlantic, LLC, commissioned this report, in support of the company's proposed mixed-use development in unincorporated Miami Dade County, Florida. The development contemplates the addition of 2,000 hotel rooms, and approximately 3,500,000 square feet of retail, a 1,400 seat movie theater complex, a 1,000-seat live venue facility, and amusement attractions that include a theme park, water park, Tivoli garden, submarine lake, art deco village, ski slope, sports center, outdoor fishing, miniature golf, all totaling 1,500,000 square feet, and common space area of 600,000 square feet.

This study is designed to estimate the annual revenues that will accrue to the various taxing authorities once the project is complete.



Study Conclusions

The proposed project, once complete, would provide the following annual revenues to various taxing authorities:

Taxing Authority	Annual Revenue
Miami Dade County	\$ 34,352,996
Unincorporated Area MSTU	2,622,490
School Board of Miami Dade County	10,352,329
South Florida Water Management District	482,936
Florida Inland Navigation District	46,920
Children's Trust	680,001
Totals	\$ 48,537,673

- The State of Florida can expect to receive approximately \$93,624,595 annually from sales taxes and gross receipt taxes.
- The project will produce \$1,600,900,000 in sales of goods and services and leases of property.
- The project would add \$1,360,001,222 in additional taxable value to the tax base of the taxing jurisdictions.



Fiscal Impact To Political Subdivisions

International Atlantic, LLC, is proposing a substantial mixed-used development that provides extensive retail, hotel, and amusement and entertainment venues. The following taxing authorities will benefit from the revenues provided by the proposed development: Miami Dade County, Unincorporated Area MSTU, School Board of Miami Dade County, South Florida Water Management District, Florida Inland Navigation District, and the Children's Trust.

Table A summarizes the various annual revenue streams that the proposed development will directly contribute to these various taxing authorities:

(continued)



Table A
Summary of Annual Revenues
Various Taxing Authorities

Taxing Authority	Property Taxes	Franchise and Utility Taxes	Stormwater Fees	Communications Service Tax	Local Option Sales Tax	Tourism Tax	Business Tax Receipts	Annual Utility Profits	Totals
Miami Dade County	10,649,082	1,637,338	183,953	228,739	16,009,000	4,599,000	13,223	1,032,662	34,352,996
Unincorporated Area MSTU	2,622,490	-	-	-	-	-	-	-	2,622,490
School Board of Miami Dade County	10,352,329	-	-	-	-	-	-	-	10,352,329
South Florida Water Management District	482,936	-	-	-	-	-	-	-	482,936
Florida Inland Navigation District	46,920	-	-	-	-	-	-	-	46,920
Children's Trust	680,001	-	-	-	-	-	-	-	680,001
Totals	24,833,758	1,637,338	183,953	228,739	16,009,000	4,599,000	13,223	1,032,662	48,537,673



Annual Sales and Gross Receipts Taxes Paid To the State of Florida

The State of Florida receives sales tax revenues on the sales of goods and services, including commercial leases and rents. It also receives Gross Receipts taxes on utilities and telecommunications. Table B summarizes the annual tax revenue from these sources:

Table B
Annual Tax Revenue To the State of Florida By Source

Source of Tax	Estimated Annual Amount
Sales Taxes, Retail Sales, State Portion	\$ 79,316,160
Sales Taxes, Rentals of Property, State Portion	6,572,125
Gross Receipts Tax on Utilities	7,725,925
Gross Receipts Tax on Telecommunications	10,385
Total Recurring Annual Revenue	<u><u>\$ 93,624,595</u></u>

Retail taxes were calculated \$350//sf for retail operations. Property rentals were based upon \$35/sf for the retail. Gross Receipt taxes were based upon the latest energy costs per square foot by use and the current tax rate levied by the State of Florida.



Property Tax Base

The property tax base is anticipated to grow by about \$1,360,001,222 million in current dollars if the project were completed in the current year.

Retail and theater space, together with the common area space taxable values were based upon \$226/sf for the retail portion of the project.

Hotel values were based upon an average of \$135,000 per room, while amusement and entertainment spaces were calculated using \$100/square foot assumptions.

Stormwater Fees

Miami Dade County levies stormwater fees for the collection and treatment of stormwater. This is in addition to any onsite treatment and retention that may be required due to the development. The fee is \$48.00/year/ERU. An ERU is an Equivalent Residential Unit based upon an average impervious area of a single-family home in the County. Using the program elements provided, the County is expected to receive \$183,953.49 in stormwater fees annually. These funds are used exclusively for stormwater systems and maintenance.

Franchise and Utility Taxes

Miami Dade County levies taxes on utilities and solid waste services in the unincorporated areas. The County levies a 5.9% electric franchise fee and a 10% utility tax on electric, water, and fuel oils, propane, and natural gas consumption. Using current estimates of consumption by square footage and use of property provided by the U.S. Energy Information Administration and then applying the applicable tax rates levied by the County, we estimate that the County will receive \$1,637,337.69 annually from the taxes on these services and products.



Intergovernmental Revenue

The State of Florida provides local governments with various revenues on a recurring basis. One of these revenue streams is the Communications Services Tax. The County sets the rate for this tax and it is collected by the State of Florida and the majority of it is remitted back to the County. Our estimate for taxes on these services is \$228,738.57

Local Option Sales Tax

The County levies an addition \$.01 (one cent) sales tax. Based upon our estimates of sales of merchandise, rentals, and leases, our estimates is that the project will have sales that will generate \$16,009,000 annually in local option sales taxes.

Tourism Tax

The County levies on customers of hotels at tourism and convention center tax of \$.06 (6 cents). Based upon our estimates of hotel room sales, the County should receive \$4,599,000 annually in this Tourism Tax.

Business Tax Receipts

The County levies an annual business tax. The tax in the County varies with the use and the County's annual levy is low. Retail establishments pay \$30 plus \$3/employee. Hotels are taxed at \$40 per hotel plus \$2 per room. Based upon these factors and the current building plan, the County is expected to receive \$13,223 annually from taxes on businesses.

Utility Profits

The County operates a water and sewer utility system. This system is operated on a proprietary, or for profit, basis. Much of the County's costs of operating its utility system are fixed costs.



We used the County's last audited comprehensive annual financial report to calculate the operating margin for water to be 39.5% for water and sewer. Based on our estimates of consumption (itself derived from use) we estimate that the County would net \$1,032,662 annually.



QUESTION 12 VEGETATION AND WILDLIFE

- A. Identify the dominant species and other unusual or unique features of the plant communities on Map F. Identify and describe the amount of all plant communities that will be preserved in a natural state following development as shown on Map H.**

Based on the Florida Land Use and Cover Classification System (FLUCCS), the project site can best be categorized as Improved Pasture (FLUCCS 211), Freshwater Marsh (FLUCCS 641), Exotic Wetland Hardwoods (FLUCCS 619), Wetland Scrub (631), and Other Hardwoods (FLUCCS 439).

The improved pasture area is currently functioning as a pasture for grazing cattle. While evidence of cattle usage was present, this area was not heavily grazed. Bordering the perimeter of this area is a row of planted bald cypress trees (approximately 25 yrs. old) with occasional Brazilian pepper. Vegetation identified in the improved pasture includes Frogbit, False buttonweed, White-topped sedge, Primrose willow, Flatsedge, Big head rush, Blue mist flower, Shoe-button Ardisia, Dog fennel and Coinwort.

The fresh water marsh area is also utilized as a pasture for grazing cattle, although little evidence of cattle grazing was observed. This area exhibits greater hydrology than the improved pasture area. Vegetation identified within this area includes Duck potato, Spikerush, Broomsedge, Camphorweed, Coinwort, St. John’s wort, and Buttonbush. Melaleuca were identified within a small area and is less than 25-ft in height with no canopy closure.

Vegetation in a 15 to 25-ft strip adjacent to the roadway on the west side of the Exotic Wetland Hardwoods area consists of sedges, Napier grass, and a canopy of Bishopwood. East of this strip, the area becomes a Melaleuca-dominated forest with 60 to 75 percent canopy closure. Understory vegetation includes leather fern, swamp fern, shield fern, royal fern, Pteris spp., wild coffee, shoe-button ardisia, and sawgrass. Old world climbing fern was also present as well as a few clustered cabbage palms.

Two mixed Wetland Scrubs areas are located in the center and eastern portion of the site. The centrally located scrub area appears to be slightly elevated and is dominated by myrsine, wax myrtle, and salt bush in the shrub layer. False buttonweed, wild coffee, swamp fern and lantana dominate the ground cover. No melaleuca exists within this area.

The adjoining scrub area to the east includes large numbers of dead melaleuca snags, giving the appearance that the area has been subjected to previous herbicide treatment. With less melaleuca canopy coverage, the shrub layer is more exposed with scattered vegetation, consisting primarily of myrsine, wax myrtle and Florida trema. Understory vegetation is dominated by sawgrass, yellowtops and swamp fern.

In the northern portion of the site, ground elevation slightly rises from the roadway, easterly into the Other Hardwoods area where the canopy is dominated by Bischofwood with a sparse understory consisting of wild coffee and Boston fern. This 0.5 ac area does not appear to be filled, but a natural area with a higher elevation that does not exhibit wetland characteristics. While the soils appeared to contain a high organic content, soils were well drained and dry following several days of heavy rain. There was no evidence of hydrology and the dominant vegetation present is not obligate or facultative wetland. To the east of the upland area, the site transitions into the melaleuca-dominated wetlands.

Natural vegetation communities on site have been altered and impacted significantly by cattle grazing and exotic/nuisance vegetation; therefore, no preservation of the existing vegetation on the site is proposed.

- B. Discuss what survey methods were used to determine the absence or presence of state or federally listed wildlife and plants. (Sampling methodology should be agreed to by the regional planning council and other reviewing agencies at preapplication conference stage.) State actual sampling times and dates, and discuss any factors that may have influenced the results of the sampling effort. Show on Map G the location of all transects, trap grids, or other sampling stations used to determine the on-site status of state or federally listed wildlife and plant resources.**

Site visits to the project site were conducted September 9, 16, 21 and October 2, 2015 between the times of 10:00 am and 3:00 pm. During the site visits meandering transects were conducted through each community type recording vegetation encountered and wildlife observations. Unusually warm temperatures and heavy rains may have inhibited the number of species observed during the site visits. Species observed during site visits were a red-shoulder hawk, a red-bellied woodpecker, and warblers. The fauna potentially occupying the property would be those tolerant of man’s activities, highly adaptive, and opportunistic such as raccoons, opossums, mourning doves, ground doves, cattle egrets, grackles, warblers, anoles, geckos, and racers.

- C. List all state or federally listed wildlife and plant resources that were observed on the site and show location on Map G. Given the plant communities on-site, list any additional state or federally listed wildlife and plant resources expected to occur on the site and show the location of suitable habitat on Map G. Additionally, address any unique wildlife and plant resources, such as colonial bird nesting sites and migrating bird concentration areas. For species that are either observed or expected to utilize the site, discuss the known or expected location and population size on-site, existence (and extent, if known) of adjacent, contiguous habitat off-site, and any special habitat requirements of the species.**

No state or federally listed wildlife and/or plant resources were observed on site. A total of 51 listed as threatened, endangered, or candidate species were identified by the US Fish and Wildlife Service (USFWS) as potentially occurring within the project area (see



attached). The project site lies within Core Foraging Areas of the endangered wood stork and within the USFWS Consultation area for the endangered Everglades snail kite, but suitable foraging and nesting habitat does not exist on the project site. Of the remaining species only two, the threatened eastern indigo snake and endangered Florida Bonneted bat, could potentially occur on the project site.

Indigo snakes are found in a wide variety of habitats including mangrove swamps, wetland prairies, xeric pinelands, and scrub. Though generalists in habitat type, suitable habitat must also contain some sort of burrow or underground shelter that the snake uses during winter months. Indigo snakes are diurnal and wide-ranging, requiring large tracts of undisturbed land. This combination makes them particularly rare because there is so little remaining unfragmented land in Florida, and where they are present they are often readily visible to poachers because of their size and diurnal habit. Snake burrows were not observed during site visits and there have been no documented occurrence of an eastern indigo snake within the project vicinity.

The Florida bonneted bat is the largest species of bat in Florida with a diet that primarily consists of flying insects. The Florida bonneted bat inhabits semitropical forests, particularly pineland, tropical hardwood, and mangrove habitat. It can be found roosting in a variety of natural and man-made substrates including chimneys, limestone outcroppings, tree cavities, bat houses, and under tiles of Spanish-style roofs. Trees on site do not provide suitable roosting habitat. The Florida bonneted bat typically forages for flying insects in open, uncluttered areas and often flies >10 m above the ground. A survey in 2006-2007 found the Florida bonneted bat at only nine locations in Florida: Coral Gables (Granada Golf Course), Homestead, Naples, North Fort Myers, Babcock Ranch, Fred C. Babcock/Cecil M. Webb Wildlife Management Area (125.5 square miles), Fakahatchee Strand Preserve State Park (117 square miles), Big Cypress National Preserve (1,125 square miles), and Everglades City.

D. Indicate what impact development of the site will pose to affected state or federally listed wildlife and plant resources.

Due to the grazing activities within the Project Site and the lack of suitable listed species habitat, no direct impacts are expected to occur to any state or federally listed wildlife and plant resources.

E. Discuss what measures are proposed to be taken to mitigate impacts to state and federally listed wildlife and plant resources. If protection is proposed to occur on-site, describe what legal instrument will be used to protect the site, and what management actions will be taken to maintain habitat value. If protection is proposed to occur off-site, identify the proposed amount and type of lands to be mitigated as well as whether mitigation would be through a regional mitigation land bank, by acquisition of lands that adjoin existing public holdings, or by other means.

Based upon the historic agricultural use of the Project Site and the significant impact of exotic/nuisance species on any remaining natural habitats, including trees as potential perching or nesting sites and thickets for refuge for native, non-nuisance animal species, no mitigative measures are proposed.

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Exhibit 12-A



United States Department of the Interior



FISH AND WILDLIFE SERVICE
South Florida Ecological Services Field Office
1339 20TH STREET
VERO BEACH, FL 32960
PHONE: (772)562-3909 FAX: (772)562-4288
URL: fws.gov/verobeach

Consultation Code: 04EF2000-2016-SLI-0003

October 06, 2015

Event Code: 04EF2000-2016-E-00011

Project Name: American Dream Miami

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

Official Species List

Provided by:

South Florida Ecological Services Field Office

1339 20TH STREET

VERO BEACH, FL 32960

(772) 562-3909

<http://fws.gov/verobeach>

Consultation Code: 04EF2000-2016-SLI-0003

Event Code: 04EF2000-2016-E-00011

Project Type: DEVELOPMENT

Project Name: American Dream Miami

Project Description: Entertainment Complex

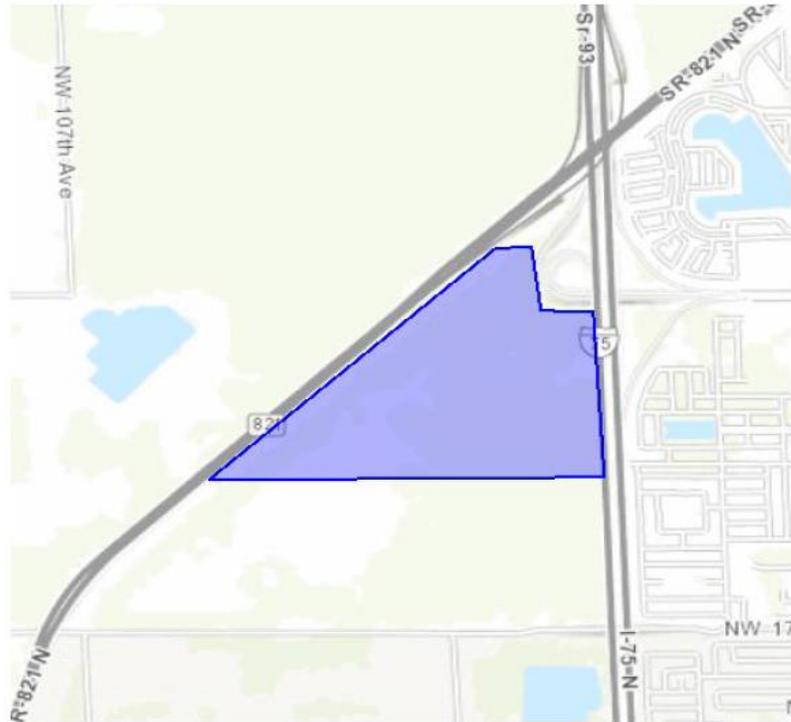
Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-80.3510856628418 25.934504969132583, -80.36833763122559 25.93438918846849, -80.35580635070801 25.944384499978714, -80.35494804382323 25.94442309027124, -80.35421848297119 25.94442309027124, -80.35383224487305 25.941683148077367, -80.35155773162842 25.94160596568401, -80.3510856628418 25.934504969132583)))

Project Counties: Miami-Dade, FL



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

Endangered Species Act Species List

There are a total of 51 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Birds	Status	Has Critical Habitat	Condition(s)
Audubon's Crested caracara (<i>Polyborus plancus audubonii</i>) Population: FL pop.	Threatened		
Bachman's warbler (<i>Vermivora bachmanii</i>) Population: Entire	Endangered		
Cape Sable Seaside sparrow (<i>Ammodramus maritimus mirabilis</i>) Population: Entire	Endangered	Final designated	
Everglade Snail kite (<i>Rostrhamus sociabilis plumbeus</i>) Population: Entire	Endangered	Final designated	
Florida Grasshopper sparrow (<i>Ammodramus savannarum floridanus</i>) Population: Entire	Endangered		
Florida scrub-jay (<i>Aphelocoma coenulescens</i>) Population: Entire	Threatened		

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Ivory-Billed woodpecker <i>(Campephilus principalis)</i> Population: Entire	Endangered		
Kirtland's Warbler <i>(Setophaga kirtlandii)</i> Population: Entire	Endangered		
Piping Plover <i>(Charadrius melodus)</i> Population: except Great Lakes watershed	Threatened		
Red Knot <i>(Calidris canutus nufa)</i>	Threatened		
Red-Cockaded woodpecker <i>(Picoides borealis)</i> Population: Entire	Endangered		
Wood stork <i>(Mycteria americana)</i> Population: AL, FL, GA, MS, NC, SC	Threatened		
Corals			
Elkhorn coral <i>(Acropora palmata)</i>	Threatened	Final designated	
Staghorn coral <i>(Acropora cervicornis)</i>	Threatened	Final designated	
Ferns and Allies			
Florida Bristle fem <i>(Trichomanes punctatum ssp. floridanum)</i>	Endangered		
Fishes			
Atlantic sturgeon (Gulf subspecies) <i>(Acipenser oxyrinchus (=oxyrhynchus) desotoi)</i> Population: Entire	Threatened	Final designated	
Smalltooth sawfish <i>(Pristis pectinata)</i> Population: United States DPS	Endangered		



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Flowering Plants			
Beach jacquemontia (<i>Jacquemontia reclinata</i>)	Endangered		
Blodgett's silverbush (<i>Argythamnia blodgettii</i>)	Proposed Threatened		
Cape Sable Thoroughwort (<i>Chromolaena frustrata</i>)	Endangered	Final designated	
Carter's Small-Flowered flax (<i>Linum carteri carteri</i>)	Endangered	Proposed	
Carter's mustard (<i>Warea carteri</i>)	Endangered		
Crenulate lead-plant (<i>Amorpha crenulata</i>)	Endangered		
Deltoid spurge (<i>Chamaesyce deltoidea</i> ssp. <i>deltoidea</i>)	Endangered		
Everglades bully (<i>Sideroxylon reclinatum</i> ssp. <i>austrofloridense</i>)	Candidate		
Florida Pineland crabgrass (<i>Digitaria pauciflora</i>)	Candidate		
Florida Semaphore Cactus (<i>Consolea corallicola</i>)	Endangered		
Florida brickell-bush (<i>Brickellia mosieri</i>)	Endangered	Proposed	
Florida prairie-clover (<i>Dalea carthagenensis floridana</i>)	Candidate		
Garber's spurge (<i>Chamaesyce garberi</i>)	Threatened		
Johnson's seagrass (<i>Halophila johnsonii</i>)	Threatened	Final designated	

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Okeechobee gourd (<i>Cucurbita okeechobeensis</i> ssp. <i>okeechobeensis</i>)	Endangered		
pineland sandmat (<i>Chamaesyce deltoidea pinetorum</i>)	Candidate		
Sand flax (<i>Linum arenicola</i>)	Proposed Endangered		
Small's milkpea (<i>Galactia smallii</i>)	Endangered		
Tiny polygala (<i>Polygala smallii</i>)	Endangered		
Insects			
Bartram's Hairstreak Butterfly (<i>Strymon acis bartrami</i>)	Endangered	Proposed	
Florida Leafwing Butterfly (<i>Anaea troglodyta floridalis</i>)	Endangered	Proposed	
Miami Blue Butterfly (<i>Cyclargus (=hemiargus) thomasi bethunebakeri</i>)	Endangered		
Schaus Swallowtail butterfly (<i>Heraclides aristodemus ponceanus</i>) Population: Entire	Endangered		
Mammals			
Florida Bonneted bat (<i>Eumops floridanus</i>)	Endangered		
Florida panther (<i>Puma (=felis) concolor coryi</i>)	Endangered		
puma (<i>Puma (=felis) concolor</i> (all subsp. except <i>coryi</i>)) Population: FL	Similarity of Appearance (Threatened)		
West Indian Manatee (<i>Trichechus</i>)	Endangered	Final designated	



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<i>manatus</i> Population: Entire			
Reptiles			
American alligator (<i>Alligator mississippiensis</i>) Population: Entire	Similarity of Appearance (Threatened)		
American crocodile (<i>Crocodylus acutus</i>) Population: FL pop.	Threatened	Final designated	
Eastern Indigo snake (<i>Drymarchon corais couperi</i>) Population: Entire	Threatened		
Green sea turtle (<i>Chelonia mydas</i>) Population: FL, Mexico nesting pops.	Endangered		
Hawksbill sea turtle (<i>Eretmochelys imbricata</i>) Population: Entire	Endangered	Final designated	
Leatherback sea turtle (<i>Dermochelys coriacea</i>) Population: Entire	Endangered	Final designated	
Snails			
Stock Island Tree snail (<i>Orthalicus reses</i>) Population: Entire	Threatened		



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Critical habitats that lie within your project area

There are no critical habitats within your project area.

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QUESTION 13 WETLANDS

A. If there are wetlands on the site, discuss and specify the following:

- 1. Acreage and percentage of property which is currently wetlands. These wetlands should be shown on Map F, Vegetation Associations and identified by individual reference numbers. (These numbers should be utilized in responding to the other sub-questions.)**

The Property was evaluated for the presence of wetland areas pursuant to the applicable Florida wetland delineation protocol contained in Section 373.019 Florida Statutes (F.S.), and the techniques included in 62-340 Florida Administrative Code (F.A.C.) and by the US Army Corps of Engineers Wetland Delineation Manual (1987). As a result of historical alteration and land use activities, the Property is mostly composed of a plant mosaic dominated by invasive exotic and undesirable vegetation. The hydroperiod of this area is also likely impacted as a result of regional drainage practices (canals) and the proximity of the Hialeah Reverse Osmosis Water Treatment Plant to the south.

Of the 194.5 acres within the property limits, a total of 194 acres consists of disturbed wetlands. No native or high quality natural wetland systems were observed within the Property boundaries. The existing low quality wetland systems remaining on-site are dominated by an association of the invasive exotic Melaleuca, Brazilian pepper and ruderal vegetation in cleared areas.

The wetlands have been identified by vegetative composition consistent with the Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT, 1999). **Table 13.1 – Vegetative Coverage** provides a list of the wetlands existing on the Property.

Table 13.1 – Vegetative Coverage

Habitat Type	FLUCCS	Acreage	Percent
Improved Pasture*	211	64.6	33.2
Freshwater Marsh	641	21.6	11.1
Exotic Wetland Hardwoods	619	88.1	45.3
Mixed Wetland Scrub	631	19.7	10.1
Other Hardwoods	439	0.5	0.3
TOTAL		194.5	100.0

* Historic wet prairie (FLUCCS 643)

Area 1, identified as Improved Pasture, is 64.6 acres of wet pasture currently functioning as a cattle grazing. While evidence of cattle usage was present, these

areas were not heavily grazed. Prior to convergence to pastures and hydrological alteration this area was likely a wet prairie (FLUCCS 643). Mucky soils were encountered throughout the site with areas of exposed surface water. Bordering the perimeter of this area is a row of planted cypress (approximately 25 yrs. old) with occasional Brazilian pepper. Vegetation identified in the improved pasture includes Frogbit, false buttonweed, White-topped sedge, Primrose willow, flatsedge, Big head rush, Blue mist flower, shoe-button ardisia, Dog fennel and Coinwort.

The Freshwater Marsh area (Area 2), consisting of 21.6 acres, is also utilized as a pasture for grazing cattle, although little evidence of cattle grazing was observed. This area exhibits greater hydrology than the improved pasture area. Vegetation identified within this area includes Duck potato, Spikerush, Broomsedge, Camphorweed, Coinwort, St. John's wort, and Buttonbush. Melaleuca were identified within a small area and is less than 25-ft in height with no canopy closure.

The Exotic Wetland Hardwoods (Area 3) at 88.1 acres makes up the majority of the site. Vegetation in a 15 to 25-ft strip adjacent to the roadway on the west side of the Exotic Wetland Hardwoods consists of sedges, Napier grass, and a canopy of Bishopwood. East of this strip, the area becomes a Melaleuca-dominated forest with 60 to 75 percent canopy closure. Understory vegetation includes leather fern, swamp fern, shield fern, royal fern, Pteris spp., wild coffee, shoe-button ardisia, and sawgrass. Old world climbing fern was also present as well as a few clustered cabbage palms. Soils were mucky and surface water was occasionally visible.

The Mixed Wetland Scrub area is made up of two adjoining areas located in the central and eastern portions of the properties (Areas 4 and Area 6). The centrally located scrub (Area 4) appears to be slightly elevated and is dominated by myrsine, wax myrtle, and salt bush in the shrub layer. False buttonweed, wild coffee, swamp fern and lantana dominate the ground cover. No melaleuca exists within this 10.2 acre area.

The adjoining mixed wetland scrub area to the east (Area 6) includes large numbers of dead melaleuca snags, giving the appearance that the area has been subjected to previous herbicide treatment. With less melaleuca canopy coverage, the shrub layer of this 9.5 acre area is more exposed with scattered vegetation, consisting primarily of myrsine, wax myrtle and Florida trema. Understory vegetation is dominated by sawgrass, yellowtops and swamp fern.

In the northern portion of the site, ground elevation slightly rises from the roadway, easterly into the Other Hardwoods area where the canopy is dominated by Bischofwood with a sparse understory consisting of wild coffee and Boston fern. This 0.5 ac area does not appear to be filled, but a natural area with a higher

elevation that does not exhibit wetland characteristics. While the soils appeared to contain a high organic content, soils were well drained and dry following several days of heavy rain. There was no evidence of hydrology and the dominant vegetation present is not obligate or facultative wetland. To the east of the upland area, the site transitions into the melaleuca-dominated wetlands of Area 3.

2. Historic hydroperiods and seasonal water elevations of on-site wetlands.

October Water Level for this Project is +3.5 NGVD and May Water Level is +2.8 NGVD. Both the hydroperiod and water levels for this area have been reduced due to the drainage of the Property and the nearby wellfield of the Hialeah water treatment plant.

3. Acreage and location of wetlands which are to be preserved in their natural or existing state, including proposed hydroperiods, seasonal water elevations and methods for preservation.

Because of the highly disturbed nature of the wetland habitat found within the Project area the entire Site is proposed to be developed. Any preservation of remnant wetland areas onsite would not provide any high-quality wetland habitat with any significant wetland functions or valuable fish and wildlife habitat.

4. Acreage and location of areas to be enhanced, including proposed hydroperiods, seasonal water elevations and methods of enhancement.

There is no pristine or high-quality wetland habitat onsite that would be feasible for enhancement.

5. Actions taken to minimize or mitigate impacts on wetland areas, including maintaining the hydroperiod and providing buffers.

The entire Property is proposed to be developed. Due to the low quality wetlands onsite, preservation of any remnant wetland areas would not result in maintaining high-quality wetland habitat that would provide significant wetland functions or provide viable fish and wildlife habitats.

The project will be subject to the concepts of avoidance, minimization, enhancement (restoration) and mitigation as a part of the sequencing process for permitting wetland impacts. It is anticipated that the Project will require compensatory mitigation to offset impacts to the disturbed wetlands. While offsite mitigation opportunities are being explored, wetland mitigation banks such as the Hole-in-the-Donut in Everglades National Park, whose service area covers the project site, has credits available. The wetland impacts and mitigation required will be evaluated using Unified Mitigation Assessment Method (UMAM) as a

part of the regulatory approval process.

6. Acreage and location of wetlands which will be disturbed or altered, including a discussion of the specific alterations and disturbances.

The project will result in the loss of 194 acres of low grade jurisdictional wetlands. These impacts are necessary to achieve the overall project goals. Impacts will result from the construction of roads and fill activity necessary for the proposed mixed-use development, as well as excavations for stormwater control.

7. Precautions to be taken during construction to protect wetland areas.

Since all of the wetlands onsite are proposed to be filled, no plan for the protection of wetlands onsite will be required. All proper turbidity precautions will be taken to prevent erosion and discharge of turbidity to adjacent properties and the canal system. Silt fences will be properly installed to surround the Property and will be maintained during all construction activities.

8. If available, provide jurisdictional determinations.

The project is in the early stages of wetland permitting and jurisdictional determinations have not been completed. Portions of the of the site may contain areas that are jurisdictional to the US Army Corps of Engineers (USACE), the South Florida Water Management District (SFWMD), and DERM pursuant to the environmental regulations of the respective agencies. All wetlands and surface waters will be evaluated according to each agency’s specific criterion.

B. Provide any proposed plans (conceptual or specific) for created or enhanced wetland areas, including littoral lake slopes, buffers, vegetative species to be planted, etc.

The Property does not have significant listed species or habitat of sufficient quality onsite to warrant preservation in their present state or location. Portions of the property not necessary for development may be maintained as a wetland, if practical. Areas to be considered are the littoral zone and perimeter of the proposed on-site retention pond in the southwest corner of the site. The wetland mitigation plan is proposed to primarily consist of the purchase of wetland credits at a local mitigation bank, such as the Hole-in-the-Donut Mitigation Bank (HID), the Florida Power & Light Everglades Mitigation Bank (EMB), and/or any other acceptable mitigations banks. Offsite opportunities are also being explored. This plan will be further refined during the regulatory permitting approval process with the SFWMD, DERM, and USACE to determine the appropriate number of credits required by the applicable regulatory agencies.

QUESTION 14 - WATER

- A. Describe the existing hydrologic conditions (both ground and surface water) on and abutting the site, including identification and discussion of any potential aquifer recharge areas. Please identify and describe any Outstanding Florida Waters, Wild and Scenic Rivers, Florida Aquatic Preserves or Florida Class I or II Waters that occur within, abutting or downstream of the site.**

Groundwater elevation on site varies from approximately 2.8 feet NGVD in the dry season to approximately 3.8 feet NGVD in the wet season. The majority of the Site is approximately 3 to 6 feet above the high groundwater level. The project is underlain by the Biscayne Aquifer. The Biscayne Aquifer is approximately 180 feet thick in the vicinity of the project and is unconfined. The Biscayne Aquifer is composed of the Fort Thompson formation, the Key Largo limestone, and Tamiami formation in this vicinity (Hydrogeology of the Surficial Aquifer System, Dade County, Florida, 1991).

Based on the Soil Survey for Miami-Dade County, this soil is ponded most of the year and when water is not ponded, the water table is at a depth less than 10 inches. No surface water bodies exist on site. The Turnpike drainage canal is located northwest of the Property. The Biscayne aquifer system is recharged primarily by stormwater percolating through the surficial soils to the water table.

Regional groundwater flow in south Florida is generally east-southeast toward the Atlantic Ocean; however, due to the flat topography, local groundwater flow may be influenced by local features, such as the adjacent canals and production wells of the Hialeah Reverse Osmosis Water Treatment plant.

There are no Outstanding Florida Waters, Wild and Scenic Rivers, Florida Aquatic Preserve, or Class I or II waters of the State within, abutting, or downstream of the Property.

- B. Describe, in terms of appropriate water quality parameters, the existing ground and surface water quality conditions on and abutting the site. (The appropriate parameters and methodology should be agreed to by the regional planning council and other reviewing agencies at the preapplication conference stage.)**

There are no surface water bodies on the Property. No groundwater data were collected during the current investigation, because the applicant intends to obtain its potable water supply from the County.



C. Describe the measures which will be used to mitigate (or avoid where possible) potential adverse effects upon ground and surface water quality, including any resources identified in Subquestion A.

The stormwater management system will be designed and permitted in accordance with South Florida Water Management District (SFWMD) and Miami-Dade DERM standards. The proposed drainage improvements, including detention swales and exfiltration trenches will retain and treat stormwater prior to discharging to ground water or retention areas in accordance with SFWMD and DERM requirements. In addition, the land use change from existing cattle raising will improve the water quality

Appropriate erosion, sedimentation, and siltation prevention and protection measures will be used throughout construction. Engineering plans will include erosion and sedimentation control procedures during construction to ensure that: 1) erosion/sedimentation control devices are in place and are maintained; and 2) best management practices (BMPs) are followed to protect the adjacent canals and wetland areas. BMPs to be used include the following:

- Surface water run-off from exposed areas during construction will be routed to retention areas, swales and/or ditches where the water can be treated to control discharges and meet state water quality criteria.
- Exposed areas will be grassed as soon as possible to stabilize the soil.

QUESTION 15 SOILS

- A. 1. Provide a description of each of the soils indicated on Map E utilizing the following format:**

Soil Description and Interpretations

SOIL NAME AND MAP SYMBOL	BRIEF SOIL DESCRIPTION	SEASONAL HIGH WATER TABLE DEPTH DURATION	PERMEABILITY RATE (in/hour)	DEGREE & KIND OF LIMITATION FOR PROPOSED USES	DEGREE & KIND OF LIMITATION FOR POND EMBANKMENTS
Lauderhill muck, depressional (3)	Moderately deep, nearly level, very poorly drained organic soils underlain by hard porous oolitic limestone at a depth of approx. 30 inches.	The soil is ponded for 9 to 12 months in most years. When water is not ponded, the water table is at a depth less than 10 inches.	6.0 to 20	Severe: subsides, ponding, low strength	Severe: excess humus, ponding
Dania muck, depressional (14)	Shallow, nearly level, very poorly drained organic soil underlain by soft porous limestone at a depth of approx. 15 inches.	The soil is ponded most of the year. When water is not ponded, the water table is at a depth less than 10 inches.	6.0 to 20	Severe: ponding, low strength, depth to rock	Severe: excess humus, ponding

- 2. Describe the potential for subsidence and any unique geologic features (such as sand dunes, bluffs, sinkholes, springs, steepheads, etc.) on the site. Discuss what aspects of the site plan will be used to compensate for or take advantage of these features.**

Limitations of the subsurface geologic features for development, which include organic soils and limestone, are severe due to subsidence, low strength and ponding. Appropriate construction measures will be used to avoid subsidence and other soil related problems. Features such as sand dunes, bluffs, sinkholes, and steepheads do not exist onsite based on the available geologic information.

- B. Where a soil presents a limitation to the type of use proposed in the development, state how the limitation will be overcome. Specify construction methods that would be used for building, road and parking lot foundations, and for lake or canal bank stabilization as relevant.**

The project area is largely composed of organic soils underlain by limestone at a depth of 14-20 inches. Soil limitation for development is severe. The limitation will be overcome by applying accepted engineering methods in South Florida, including proper site planning and removing/adding appropriate amounts of fill material. Methods and approaches for specific areas are dependent upon location and land use and will be defined in the detailed engineering design.

- C. What steps will be taken during site preparation and construction to prevent or control wind and water soil erosion? Include a description of proposed plans for clearing and grading as related to erosion control.**

All local, state and federal regulations that are designed to prevent soil erosion and sedimentation will be followed. Construction will proceed in an orderly fashion, with erosion-control measures implemented before and immediately after earthwork on each site, as most appropriate.

To control soil erosion during site preparation due to wind, during site preparation the disturbed areas of the site will be sprayed with water using water trucks. Keeping the soil surface moist will control dust and soil erosion. Contractors will be required to have water trucks on site to control dust.

To control soil erosion due to water, (erosion control devices) silt fences, temporary swales and hay bales as appropriate, will be installed in the immediate vicinity of the construction areas and other locations deemed necessary. Erosion control devices will prevent particles carried by water from entering waterways, storm water drains, drainage swales, and surface water detention areas. Contractors shall be responsible for maintaining appropriate erosion control devices.

Mulching, seeding or sodding, and planting vegetation in cleared areas around constructed buildings will be conducted as soon as practical. Permanent drainage facilities will be built to keep up with site development and will be closely monitored during the development phase.

- D. To what degree and in what location(s) will the development site be altered by fill material? If known, specify the source location and composition of the fill. Also identify the disposal location for any overburden or spoil.**

In general, for economic reasons attempts are made to cut and fill within the project boundaries as much as practical. Fill material required for the development is partially



expected to be generated from the lake excavation activities that are required to construct stormwater retention ponds on the property. The material from the lake is expected to consist of limestone and sand. Additional fill material is anticipated to be provided from nearby quarries.

During project development, detailed engineering plans will be prepared addressing final site topography and the plans will identify cross sections and quantities of any fill material to be placed in wetlands. Disposal locations for overburden and spoil will be determined at time of construction.



QUESTION 16 - FLOODPLAINS

A. Identify any pre- and post-development flood prone areas.

The site is currently at a very low elevation ranging from 2.70' to 5.25' NGVD and is located in the Western C-9 Basin and within the floodplain. The site is currently vacant and flood prone. There is no existing structured stormwater management system currently on the site and a robust system is proposed for the post-development condition. Refer to question 19 for more detail.

B. Is any development proposed within a 100-year flood prone area as identified by the Federal Emergency Management Agency? If so, indicate the appropriate Flood Insurance Rate Map (FIRM) zone designations and their locations, etc.

The development is located in flood zone AE with a base flood elevation of 7. The following figure 16-1 demonstrates the FEMA FIRM map for the development area:



Figure 16-1: FEMA FIRM map for development area.

- C. If any structures, roadways or utilities are proposed within the post-development 100-year flood prone area, identify their location and indicate what measures will be taken to mitigate the potential flood hazard and to maintain the 100-year floodplain storage volume.**

All structures and above ground utilities will have finish floor elevations above the FEMA flood elevation. Other features will be protected with a robust Stormwater Management system. Refer to Question 19 with respect to the Stormwater Management measures that the development will include to address the floodplain storage volume.

- D. Discuss any potential increases in the off-site flooding due to the development of this project.**

The development program is planned with infrastructure measures designed to control any potential increases of off-site flooding. This development falls within the Western C-9 basin of the SFMWD district and must adhere to their strict criteria. Refer to Question 19 for more detail on the Stormwater Management measures that the development will include to address the flood mitigation.

QUESTION 17 - WATER SUPPLY

A.

1. Provide a projection of the average daily potable and non-potable water demands at the end of each phase of development. If significant seasonal demand variations will occur, discuss anticipated peaks and duration. Use the format below:

The American Dream Miami Development will be constructed as one phase and the water supply system will be constructed to serve the entire site. The following table provides a full breakdown of the proposed uses on the site and the calculated potable water demand for each use. The table also included a comparison of the proposed demand to the demand capacity under the current approved land use.

Table 17-1 Potable Water Demand					
Land Use	Unit	Quantity	Water Use (GPD/Unit)	Est. Potable Water Average Daily Demand (MGD)	Est. Potable Water Maximum Daily Demand (MGD) ²
Proposed Land Use					
1. Retail	SQ. FT.	3,500,000	10gpd/100sq.ft.	0.350	0.79
2. Entertainment	SQ. FT.	1,500,000	20gpd/100sq.ft.	0.300	0.68
3. Common Area/"Back of House"	SQ. FT.	1,200,000	5gpd/100sq.ft.	0.060	0.14
4. Hotel (keys)	ROOM	2,000	100gpd/room	0.200	0.45
Sub-total				0.910	2.048
Approved Land Use					
Warehouse	SQ. FT.	4,083,968	1gpd/100sq.ft.	0.034	0.077
Office	SQ. FT.	57,300	5gpd/100sq.ft.	0.003	0.006
Business Park/Showroom	SQ. FT.	95500	10gpd/100sq.ft.	0.010	0.021
Sub-total				0.046	0.105
Total Net Change				0.864	1.943

The non-potable water demand include site irrigation. To estimate the site irrigation demand we estimate a rate of approximately 40,000 gallons, per acre, per week. At this stage we estimate that approximately 20 Acres of the total site will have landscaped areas that will require irrigation, therefore an estimate of 0.114MGD is the average daily demand for irrigation.

In addition, based upon the Applicant experience with their similar developments throughout North America, we estimate about a 40,000 GPD (0.04 MGD) requirement for make-up water for backwash and general maintenance of the water park features. This figure is included in the above estimate.

2. Describe how this demand information was generated, including the identification of the consumption rates assumed in the analysis.

The water demand information is based upon the Miami-Dade County Schedule of Daily Gallonage for Various Occupancies. The following table identifies the occupancies used for the analysis results of table 17-1:

Retail:	10gpd/100sq.ft.
Entertainment:	20gpd/100sq.ft. (est.)
Hotel:	100gpd/room
Common Area/Office:	5gpd/100sq.ft.
Full Service Restaurant:	100gpd/100sq.ft.
Theater:	3gpd/seat - (approx. 10sq.ft. per seat required)
Warehouse:	1gpd/100sq.ft.

In addition, per the Miami-Dade County Public Works Manual Part II, section D8.03b, the Maximum Daily Demand was calculated as 225% of the A.D.D. and the Peak Hour Demand was calculated as 450% of A.D.D.

B. Provide a breakdown of sources of water supply, both potable and non-potable, by development phase through project completion. Use the format below.

The potable water supply will be supplied to the site by Miami-Dade Water and Sewer Department (MDWASD). We have met with MDWASD and have initiated a service agreement resulting in a Letter of Availability (LOA) confirming their ability to serve the project and the possible points of connection. The LOA is included as Exhibit 17-1

C. If water wells exist on-site, locate them on Map H and specify those that will continue to be used. Also locate on Map H all proposed on-site wells. (For residential developments, if individual wells for each lot are proposed, simply indicate the number of units to be served, general locations, and any plans for eventual phase-out.) Indicate the diameter, depth, and pumping rates (average and maximum) for each of the existing wells and project this information for the proposed wells (for lots served by individual dual wells, this information may be grouped for projection purposes). Also provide a breakdown of the wells with regard to potable and non-potable sources.

A comprehensive survey of the site has not yet been completed to determine the existence of water wells. However if there are any existing non-potable wells encountered on the site they will be removed during construction. As part of the project there are no potable supply wells being proposed. As part of the project, consideration may be given to complete our irrigation demands through water reuse and treatment subject to local and

state permitting. Should irrigation require the installation of non-potable supply wells, they will permitting in accordance with Miami-Dade RER, FDEP, and the SFWMD.

D. If on-site water wells are used, will this result in interference with other water wells or result in adverse impacts to underlying or overlying aquifers? Document the assumptions underlying this response.

No on-site water wells are proposed at this time. Under consideration at this time is the using reclaimed and treated water to meet the projects irrigation needs, however if irrigation wells are proposed they will permitting in accordance with Miami-Dade RER, FDEP, and the SFWMD.

E. Who will operate and maintain the internal water supply system after completion of the development?

Upon completion of the development, the Miami-Dade Water and Sewer Department will operation and maintain the internal water supply system.

F. 1. If an off-site water supply is planned, attach a letter from the agency or firm providing service outlining:

- (a) the projected excess capacities of the water supply facilities to which connection will be made at present and for each phase through completion of the project,
- (b) any other commitments that have been made for this excess capacity,
- (c) a statement of the agency or firm's ability to provide services at all times during and after development. (This agency must be supplied with the water demand and supply tables in paragraphs A and B above).

Upon coordination with MDWASD and the initiation of a service agreement which included the water demand requirements, MDWASD issued a Letter of Availability (LOA) dated July 29, 2015 which confirms the ability of the agency to supply the required demand and provided preliminary points of connection for the project. The LOA is included as exhibit 17-1.

2. If service cannot be provided at all times during and after development, identify the required capital improvements, timing, cost, and proposed responsible entity for each phase in which service is unavailable.

The services are anticipated to be constructed early in construction to be available during and after development. The required capital improvements are detailed in

the LOA attached as exhibit 17-1. The cost and responsible entity for the capital improvement is currently being evaluated and will be determined at a later date.

G. Please describe any water conservation methods or devices incorporated into the plan of development. What percentage of reduction is anticipated over conventional plans?

Where appropriate, the proposed development will use water conservation devices and methods such as low-flow plumbing fixtures as those listed in Section 604.4 of the Florida Building Code. In addition, during periods of severe water shortage, the project will adhere to the requirements of Chapter 24, Section 12.1(8) of the Miami-Dade Code and Chapter 40E-21 of the Florida Administrative Code. The project's landscaping will adhere to Chapter 18A of the Miami-Dade Code which promotes the use of xeriscape principles, the use of moisture and rain sensor switches for irrigation, and sets design standards for irrigation systems to not overthrow or overflow on to impervious surfaces.

In addition consideration is being given to including a water reuse and treatment program on site to accommodate irrigation demands thereby significantly reducing the use of water supply and/or on-site irrigation wells. These components are still under evaluation for inclusion into the project, so a percentage of reduction over conventional water supply designs is not available at this time.

H. Indicate whether proposed water service will be provided within an established service area boundary.

The proposed water service falls within the established service area boundary of the Miami-Dade Water and Sewer Department as described in the LOA in exhibit 17-1.

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Exhibit 17-1

Water and Sewer
P.O. Box 330316 • 3575 S. Lejeune Road
Miami, Florida 33233-0316
Telephone: 786-268-5360

miamidade.gov

July 29, 2015

International Atlantic
7485 Fairway Drive, Suite 430
Miami Lakes, FL 33014

Re: Water and Sewer Availability for (15-323501) for "American Dream Project", construction and connection of 6.9 million square feet of entertainment, retail and hotel, located at southern corner of I-75 and HEFT to approximately NW 178 Street, Folios #30-2008-001-0300, -0230, -0240, -0170, -0040, -0050, -0060, and -0080; 30-2009-001-0253, -0254, -0251, -0252, -0250, -0242, -0241, -0240, -0170, -0265, -0260, -0270, -0290, -0200, and -0320; and 30-2004-000-0040.

Ladies and Gentlemen:

This letter is in response to your inquiry regarding water and sewer availability to the above-referenced property for the construction and connection of three million five hundred thousand (3,500,000) square feet of retail, one million eight hundred fifty thousand (1,850,000) square feet of entertainment, and two thousand (2,000) hotel rooms, replacing vacant land.

WATER: The developer shall connect as follows:

1. Connect to an existing thirty-six (36) inch transmission water main (E-13836-2 & -3) in N.W. 170 Street close to N.W. 97 Avenue at a point, either east or west of N.W. 97 Avenue, and extend a sixteen (16) inch water main, either westerly or easterly in N.W. 170 Street to N.W. 97 Avenue, then, northerly in N.W. 97 Avenue and in *proposed* N.W. 97 Avenue to the southern boundary of the developer's property, then, extend a minimum twelve (12) inch water main within the developer's property in an easement or within dedicated public right-of-ways in a looped system.

OR

2. If conveyed by the time this project is ready for construction, then, the developer shall connect to a proposed sixteen (16) inch water main (DW-2014-111; Agreement ID# 20189) in *proposed* N.W. 97 Avenue north of *proposed* N.W. 174 Street, and extend a sixteen (16) inch water main northerly in *proposed* N.W. 97 Avenue to the southern boundary of the developer's property, then, extend a minimum twelve (12) inch water main within the developer's property in an easement and/or within dedicated public right-of-ways in a looped system. Also, connect to an existing thirty-six (36) inch transmission water main (E-13836-2 & -3) in N.W. 170 Street close to N.W. 97 Avenue at a point

either east or west of N.W. 97 Avenue, and extend a sixteen (16) inch water main either westerly or easterly in N.W. 170 Street to N.W. 97 Avenue, connecting to the aforementioned proposed sixteen (16) inch water main (DW-2014-111; Agreement ID# 20189) at that location. Also, cut and plug the aforementioned proposed sixteen (16) inch water main (DW-2014-111; Agreement ID# 20189) in N.W. 97 Avenue and N.W. 170 Street in order to disconnect said water main service from the City of Hialeah's system, which will need to be coordinated with AMB 1-75 INDUSTRIAL PARK property.

Also, the developer shall connect to an existing twelve (12) inch water main (E-12189-4) in N.W. 186 Street (Miami Gardens Drive) west of N.W. 87 Avenue, and extend a sixteen (16) inch water main westerly in N.W. 186 Street and in *theoretical* N.W. 186 Street to the eastern boundary of the developer's property, then, extend a minimum twelve (12) inch water main within the developer's property in an easement and/or within dedicated public right-of-ways in a looped system, connecting to the aforementioned proposed twelve (12) inch water mains within the developer's property described above in points of connection items No. 1 and No. 2. Any public water main extension within the property shall be twelve (12) inch minimum diameter. If two (2) or more fire hydrants are to be connected to a public water main extension within the property, then the water system shall be looped with two (2) points of connection.

SEWER: The developer shall install a new Public Pump Station for this project. It shall be located in a centralized area of the property so that it is close to the center of any of the quarter (¼) sections within Section Q-2, Section Q-3 or Section R-3, since the subject project falls within the three aforementioned sections. The developer shall:

1. a) Connect to an existing twelve (12) inch force main (ES-7739-1) in N.W. 170 Street west of and close to the center line of N.W. 87 Avenue, and extend a twelve (12) inch force main westerly in N.W. 170 Street to N.W. 97 Avenue, then, northerly in N.W. 97 Avenue and in *proposed* N.W. 97 Avenue to the to the southern boundary of the developer's property, then, extend a minimum eight (8) inch force main within the developer's property in an easement and/or within dedicated public right-of-ways to a point as required to provide service to the proposed Public pump station. The size of the proposed force main to be determined and confirmed at the time Force Main Pressure Analysis results are obtained.

OR

b) If conveyed by the time this project is ready for construction, then, the developer shall connect to a proposed sixteen (16) inch force main (DS-2014-549; Agreement ID# 20189) in *proposed* N.W. 97 Avenue north of *proposed* N.W. 174 Street, and extend a sixteen (16) force main northerly in *proposed* N.W. 97 Avenue to the southern boundary of the developer's property, then, extend a minimum eight (8) inch force main within the developer's property in an easement and/or within dedicated public right-of-ways to a point as required to provide service to the proposed Public pump station. Also, the developer shall connect to an existing twelve (12) inch force main (ES-7739-1) in N.W. 170 Street west of and close of the center line of N.W. 87 Avenue, and extend a twelve (12) force main westerly in N.W. 170 Street to N.W. 97 Avenue, connecting to the aforementioned proposed sixteen (16) inch force main (DS-2014-549; Agreement ID#

20189) at that location. Also, the developer shall cut and plug the aforementioned proposed sixteen (16) inch force main (DS-2014-549; Agreement ID# 20189) in N.W. 97 Avenue and N.W. 170 Street in order to disconnect said force main service from the City of Hialeah's system, which will need to be coordinated with AMB 1-75 INDUSTRIAL PARK property. The size of proposed force main to be determined and confirmed at the time Force Main Pressure Analysis results are obtained.

2. Dedicate a forty-five by sixty-five foot (45' x 65') tract site for the proposed Public pump station.
3. Provide gravity sewer main stub-outs at full depth at the abutting property lines such that any of the abutting properties will be able to connect to the aforementioned proposed stub-outs. Any public gravity sewer within the property shall be eight (8) inch minimum diameter.
4. Provide and install an emergency generator with building at the pump station site for the aforementioned proposed M-D W.A.S.D. public pump station since the proposed flow not inclusive of peak flow demands is greater than (> 100 GPM).

Construction connection charges and connection charges shall be determined once the developer enters into an agreement for water and sewer service, provided the Department is able to offer those services at the time of the developer's request. Information concerning the estimated cost of facilities must be obtained from a consulting engineer. All costs of engineering and construction will be the responsibility of the developer. Easements must be provided covering any on-site facilities that will be owned and operated by the Department.

Please be advised that the right to connect the referenced property to the Department's sewer system is subject to the terms, covenants and conditions set forth in court orders, judgments, consent orders, consent decrees and the like entered into between the County and the United States, the State of Florida and/or any other governmental entity, including but not limited to, the Consent Decree entered on April 9, 2014, in the United States of America, State of Florida and State of Florida Department of Environmental Protection v. Miami-Dade County, Case No. 1:12-cv-24400-FAM, as well as all other current, subsequent or future enforcement and regulatory actions and proceedings.

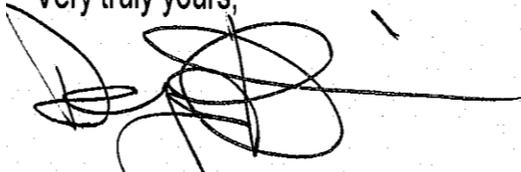
The developer is hereby advised that the subject property falls within a designated protected wetland area. The developer is not authorized to commence any work or activities pursuant to this permit until the developer obtains any and all approvals or permits, if necessary, from the County's Department of Regulatory and Economic Resources (RER). Please be advised that, even after work commences, if the County is advised by the Federal Government, the State of Florida, or a court that an activity on the subject property is in violation of Federal law, in

violation of Florida law, or in violation of a permit or approval granted by the Federal Government, such violation may result in an immediate stop work order. The developer is strongly advised to consult with the necessary federal or state agencies before conducting any work or activities on the property. Please be aware that the Federal Government may require certain actions or protections on the property, and this may result in the need to modify the plans for the property. Therefore, it is recommended that the developer consult with the Federal Government at an early stage in the process. In the event that the Federal Government advises that the plans for the subject property may result in a "take" of endangered or threatened species, the developer is strongly recommended to inform the County in writing at the earliest stage possible.

This letter is for informational purposes only and conditions remain in effect for thirty (30) days from the date of this letter. Nothing contained in this letter provides the developer with any vested rights to receive water and/or sewer service. The availability of water and/or sewer service is subject to the approval of all applicable governmental agencies having jurisdiction over these matters. When development plans for the subject property are finalized, and upon the developer's request, we will be pleased to prepare an agreement for service, provided the Department is able to offer those services at the time of the developer's request. The agreement will detail requirements for off-site and on-site facilities, if any, points of connection, connection charges, capacity reservation and all other terms and conditions necessary for service in accordance with the Department's rules and regulations.

If we can be of further assistance in this matter, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "Douglas Pile", with a long horizontal line extending to the right.

Douglas Pile, Esq.
New Business Section

QUESTION 18 - WASTEWATER MANAGEMENT

- A. Provide, in the table given below, the projected wastewater generation at the end of each phase of development and proposed wastewater treatment. Identify the assumptions used to project this demand.**

The American Dream Miami Development will be construction as one phase and the wastewater management system will be construction to serve the entire site. Table 18-1 below details the proposed uses throughout the development and the proposed sewage flows from each use and the entire site. The table also included a comparison of the proposed demand to the demand capacity under the current approved land use.

Table 18-1 Wastewater Flows					
Land Use	Unit	Quantity	Sewage Loading (GPD/Unit)	Total Est. Sewage Flows (MGD)	Peak Hourly Sewage Flows (MGH)
Proposed Land Use					
1. Retail	SQ. FT.	3,500,000	10gpd/100sq.ft.	0.350	0.044
2. Entertainment	SQ. FT.	1,500,000	20gpd/100sq.ft.	0.300	0.038
3. Common Area/Back of House	SQ. FT.	1,200,000	5gpd/100sq.ft.	0.060	0.008
4. Hotel (keys)	ROOM	2,000	100gpd/room	0.200	0.025
Sub-total				0.910	0.114
Approved Land Use					
Warehouse	SQ. FT.	3,403,396	1gpd/100sq.ft.	0.034	0.004
Office	SQ. FT.	57,300	5gpd/100sq.ft.	0.003	0.0004
Business Park/Showroom	SQ. FT.	95,500	10gpd/100sq.ft.	0.010	0.001
Sub-total				0.046	0.006
Net Total Change				0.864	0.108

Note 1: A conservative Peak Hourly Flow factor of 3 was used based on the "Ten States Standards"

The sewage flow rate information is based upon the Miami-Dade County Schedule of Daily Gallonage for Various Occupancies. The following table identifies the occupancies used for the analysis results of table 18-1:

Retail:	10gpd/100sq.ft.
Entertainment:	20gpd/100sq.ft. (est.)
Hotel:	100gpd/room
Common Area/office:	5gpd/100sq.ft.
Full Service Restaurant:	100gpd/100sq.ft.
Theater:	3gpd/seat - (approx. 10sq.ft. per seat required)
Warehouse:	1gpd/100sq.ft.

- B. If applicable, generally describe the volumes, characteristics and pre-treatment techniques of any industrial or other effluents prior to discharge from proposed industrial-related use(s).**

There are no proposed industrial-related uses for this site and such is not applicable.

C.

- 1. If off-site treatment is planned, identify the treatment facility and attach a letter from the agency or firm providing the treatment outlining present and projected excess capacity of the treatment and transmission facilities through buildout, any other commitments that have been made for this excess and a statement of ability to provide service at all times during or after development.**

The offsite treatment will be conducted by Miami-Dade Water and Sewer Department (MDWASD). We have met with MDWASD and have initiated a service agreement resulting in a Letter of Availability (LOA) confirming their ability to serve the project and the possible points of connection. The LOA is included as Exhibit 17-1

- 2. If service cannot be provided, identify the required capital improvements, cost, timing, and proposed responsible entity necessary to provide service at all times during and after development.**

The services are anticipated to be constructed early in construction to be available during and after development. The required capital improvements are detailed in the LOA attached as exhibit 17-1. The cost and responsible entity for the capital improvement is currently being evaluated and will be determined at a later date.

D. If septic tanks will be used on site, indicate the number of units to be served, general locations and any plans for eventual phase-out.

Septic tanks are not currently proposed for use on the site, however if required during construction activities they will be design and permitted in accordance with local and state regulators including Miami Dade RER and FDEP.

E. Indicate whether proposed wastewater service will be provided within an established service area boundary.

The proposed wastewater service falls within the established service area boundary of the Miami-Dade Water and Sewer Department as described in the LOA in exhibit 17-1.

QUESTION 19 - STORMWATER MANAGEMENT

- A. Describe the existing drainage patterns on-site as shown on Map I, including any potential flooding and erosion problems.**

The site is currently predominantly agricultural use and at a low elevation ranging from 2.70' to 5.25' NGVD and is located in the Western C-9 Basin and within the floodplain. Existing drainage patterns are exclusively on-site infiltration, there is no structured stormwater management system currently on the site.

- B. Describe the various elements of the proposed drainage system shown on Map I, including any wetlands to be used as part of the system, and discuss the design criteria (including stage-storage/stage discharge assumption) to be used for the various elements. Provide typical cross-sections (showing dimensions, slopes and control elevations) for any proposed lakes or swales. Identify the control elevation for all drainage structures. Include information as to what design storm will be used for what portions of the system.**

Based upon the preliminary site assessments and discussions with the Agencies Having Jurisdiction (AHJ), the following are some of the key elements that the project approach will address during the site development process.

The project as a whole is approximately **194.48 acres** located in the southwest corner of the intersection of Interstate 75 and the Florida Turnpike. Approximately **23.29 acres** of the site will be dedicated to FDOT for the purpose of interchanges and ramps and will have its own stormwater management system and not included as part of the site study. Therefore, the net project site for the purposes of drainage studies is **171.19 acres**. The proposed drainage system will likely consist of a robust on-site exfiltration trench system and on-site lake of approximately 18 Acres to manage the design storm events as required by the AHJ's. Final determination of drainage capacity on the site will depend on the hydrological study that will be completed in the coming months.

The preliminary study identifies that this project lies within the Western C-9 Basin. This basin includes criteria for cut and fill requirements which allows for a floodplain encroachment volume of 2' times the site area. The International Atlantic team will work with the SFWMD and the other AHJ's to design a site layout in accordance with this criteria.

It should be noted that the Applicant has performed extensive coordination with the SFWMD, FDEP, and Miami-Dade RER to date and all agencies are aware of the project intentions.

In general, the stormwater management system will be designed and permitted in accordance with South Florida Water Management District (SFWMD) and Miami-Dade RER standards. The proposed drainage improvements, including detention swales and exfiltration trenches will retain and treat stormwater prior to discharging to ground water or retention areas in accordance with SFWMD and DERM requirements. In addition, the land use change from existing cattle raising will improve the water quality

Appropriate erosion, sedimentation, and siltation prevention and protection measures will be used throughout construction. Engineering plans will include erosion and sedimentation control procedures during construction to ensure that: 1) erosion/sedimentation control devices are in place and are maintained; and 2) best management practices (BMPs) are followed to protect the adjacent canals and wetland areas. BMPs to be used include the following:

- Surface water run-off from exposed areas during construction will be routed to retention areas, swales and/or ditches where the water can be treated to control discharges and meet state water quality criteria.
- Exposed areas will be grassed as soon as possible to stabilize the soil.

C. From Map I, indicate the total number of acres in each drainage area and specify the acreage of any portions of drainage areas outside the site boundaries. Complete the following table for on-site drainage areas.

The following table, 19-1, includes the on-site and off-site project drainage areas

PHASING	IMPERVIOUS SURFACES (ACRES)	SURFACE RETENTION (ACRES)	OPEN SPACE (ACRES)	TOTAL ACRES
Existing	0.00	0.00	171.19	171.19
Complete Project Site	136.70	18.00	16.49	171.19
Total Development	136.70	18.00	16.49	171.19

D. Specify and compare the volume and quality of run-off from the site in its existing condition to the anticipated run-off at the end of each phase of development. (The parameters to be used to define "quality" and methodology should be agreed to by the regional planning council and other reviewing agencies at the pre-application conference stage.) Identify any changes in timing or pattern of water-flows between pre- and post-development conditions. Indicate major points of discharge and ultimate receiving water body(ies). Indicate what provisions will be incorporated in the design of the drainage system, including a summary description of any Best



Management Practices to be utilized, to minimize any increase in run-off from the site and to minimize any degradation of water quality in the ultimate receiving body over that occurring in its pre-development state.

This project will discharge into the C-9 canal system that ultimately discharges to Biscayne Bay therefore water quality is of utmost importance. The existing condition does not contain any structural drainage features and therefore any runoff from the site to offsite water bodies occurs through overland sheet-flow into the canals as the site is surcharged.

In our proposed developed condition the site will include an extensive system of on-site exfiltration trenches and an on-site 18 acre lake sized to accommodate the design storm events and therefore contain the primary volume of water and the first flush which contains the highest concentration of contaminants and pollutants and meet the TMDL standards of this basin.

All runoff from the site will be treated through the BMP's described above, which again include primary treatment through the catch basin and exfiltration trenches, and secondary treatment through the lakes. Additional BMP's in the system will include baffles at the catch basins connected to exfiltration trenches and baffle structures prior to discharge into the lakes.

E. Who will operate and maintain the drainage system after completion of the development?

The owner will operate and maintain the drainage system after completion of the development.

QUESTION 20 - SOLID WASTE/HAZARDOUS WASTE/MEDICAL WASTE

- A. **Provide a projection of the average daily volumes of solid waste generated at the completion of each phase of development. Use the format below and identify the assumptions used in the projection.**

The following table, 20-1, includes a breakdown of the projected daily volumes of waste generation from the site. The table also included a comparison of the proposed demand to the demand capacity under the current approved land use.

Table 20-1 Solid Waste Generation Table						
Land Use	Unit	Quantity	Average Waste Generation Rate ¹ (lbs/sq.ft./yr.)	Pounds Per Day	Cubic Yards Per Day (CYD)	Tons per Day (TPD)
Proposed Land Use						
1. Retail	SQ. FT.	3,500,000	7.47	71,630	294.77	35.82
2. Entertainment	SQ. FT.	1,500,000	5.34	21,945	90.31	10.97
3. Common Area/Back of House	SQ. FT.	1,200,000	2.09	6,871	28.28	3.44
4. Hotel	Rooms	2,000	8.18	34,244	140.92	17.12
Sub-total				134,691	554.28	67.35
Approved Land Use						
Warehouse	SQ. FT.	4,083,968	5.20	48,487	199.53	24.24
Office	SQ. FT.	57,300	2.09	328	1.35	0.16
Business Park/Showroom	SQ. FT.	95,500	7.47	1,954	8.04	0.98
Sub-total				50,769	208.93	25.38
Total Net Change				83,921	345.35	41.96

Notes:

1. Solid Waste Generation Rates are based upon the findings of the 1995 Commercial Generation Study performed by The Palm Beach County Solid Waste Authority (SWA), included as Exhibit 20-1.
2. Weight to Cubic Yard conversion are based upon an estimate of 9lbs per Cubic Foot of waste.
3. Land Uses which act as common areas within the development are treated as "transportation terminals" as this is the closest land use type presented in the study.

- B.

1. **Please specify the extent to which this project will contain laboratories, storage facilities, and warehouse space where hazardous materials may be generated or utilized. What types of hazardous waste or toxic materials are likely to be generated? Will a hazardous materials management plan be prepared covering all uses of hazardous materials on-site? If so, please discuss contents and enforcement provisions.**

The only storage facilities anticipated for the site will be as a compliment to the retail, hotel, and restaurant uses where storage of merchandise, equipment, or food products are required. There are no anticipated uses that will generate toxic or hazardous materials. If such uses arise, the owner, Applicant, or leaseholder will submit as required a hazardous materials management plan for approval by the Miami-Dade County RER and FDEP and in accordance with current local and state regulations.

2. **Please discuss what measures will be taken to separate hazardous waste from the solid waste stream. What plans and facilities will be developed for hazardous or toxic waste handling, generation, and emergencies?**

As stated in question 1, there is no hazardous waste anticipated to be generated from this site. Should hazardous waste be present it will be removed from the solid waste at the point of origin per local and state regulations.

3. **Please identify off-site disposal plans for hazardous waste generated by this development and provide assurance of proper disposal by a qualified contractor.**

Because there is no hazardous waste generation anticipated from the project at this time, a contract has not been identified to perform these services.

4. **What local and state regulations, permits and plans will regulate the generation and handling of hazardous waste at this development?**

Although not anticipated, the Applicant will comply with all legislation governing hazardous waste generation and handling. The handling and generation of any hazardous waste will be regulated by the U.S. Environmental Protection Agency and other local, state and federal agencies. In addition, hazardous waste generation and handling are regulated locally by Chapter 24 of the Miami-Dade County Code.

- C. **For all waste disposal planned (on or off site), attach a copy of the letter from the developer describing the types and volumes of waste and waste disposal areas requested, and attach a letter from the agencies or firms providing services outlining:**

1. **the projected excess capacity of the facilities serving the development at present and for each phase through completion of the project,**
2. **any other commitments that have been made for this excess capacity,**

- 3. a statement of the agency's or firm's ability to provide service at all times during and after development (the agency or firm must be supplied with the solid waste generation table in (A) above).**

No on-site disposal of solid waste is anticipated, all solid waste disposal will be off site. Attached as Exhibit 20-1, is a letter from Waste Management demonstrating their ability and commitment to service the Solid Waste needs of American Dream Miami.



November 1, 2015

Mr. Robert M. Gorlow
International Atlantic, LLC
One Meadowlands Plaza, 6th Floor
East Rutherford, NJ 07073

RE: American Dream Miami Project

Dear Mr. Gorlow,

Thank you for meeting with us and reviewing the plans for the American Dream Miami Project. Based on the information provided, please utilize this letter as confirmation that Waste Management Inc. of Florida will be able to provide commercial waste and recycling services for the entirety of the project located in Unincorporated Miami Dade County.

If you require additional assistance, please contact me directly at 305-986-5120.

Sincerely,

Susie Vega

Susie Vega
Major Account Executive
Waste Management Inc. of Florida
sanevega@wm.com

2125 NW 10th Court
Miami, Florida 33127
305-471-4444

PART IV. TRANSPORTATION RESOURCE IMPACTS

QUESTION 21 - TRANSPORTATION

The following Questions will be addressed under the Transportation and Traffic Study performed by Leftwich Consulting to be submitted on December 15, 2015.

- A. Using Map J or a table as a base, indicate existing conditions on the highway network within the study area (as previously defined on Map J), including AADT, peak-hour trips directional, traffic split, levels of service and maximum service volumes for the adopted level of service (LOS). Identify the assumptions used in this analysis, including "K" factor, directional "D" factor, facility type, number of lanes and existing signal locations. (If levels of service are based on some methodology other than the most recent procedures of the Transportation Research Board and FDOT, this should be agreed upon at the preapplication conference stage.) Identify the adopted LOS standards of the FDOT, appropriate regional planning council, and local government for roadways within the identified study area. Identify what improvements or new facilities within this study area are planned, programmed, or committed for improvement. Attach appropriate excerpts from published capital improvements plans, budgets and programs showing schedules and types of work and letters from the appropriate agencies stating the current status of the planned, programmed and committed improvements.
- B. Provide a projection of vehicle trips expected to be generated by this development. State all standards and assumptions used, including trip end generation rates by land use types, sources of data, modal split, persons per vehicle, etc., as appropriate. The acceptable methodology to be used for projecting trip generation (including the Florida Standard Urban Model Structure or the Institute of Transportation Engineers trip generation rates) shall be determined at the preapplication conference stage.
- C. Estimate the internal/external split for the generated trips at the end of each phase of development as identified in (B) above. Use the format below and include a discussion of what aspects of the development (i.e., provision of on-site shopping and recreation facilities, on-site employment opportunities, etc.) will account for this internal/external split. Provide supporting documentation showing how splits were estimated, such as the results of the Florida Standard Urban Transportation Model Structure (FSUTMS) model application. Describe the extent to which the proposed design and land use mix will foster a more cohesive, internally supported project.

INTERNAL/EXTERNAL SPLIT - VEHICLE TRIPS

PHASING	VEHICLE TRIPS (ADT)		PEAK HOUR VEHICLE TRIPS	
	INTERNAL	EXTERNAL	INTERNAL	EXTERNAL
Existing				
Phase 1				
.				
.				
.				
n				

- D. Provide a projection of total peak hour directional traffic, with the DRI, on the highway network within the study area at the end of each phase of development. If these projections are based on a validated FSUTMS, state the source, date and network of the model and of the TAZ projections. If no standard model is available or some other model or procedure is used, describe it in detail and include documentation showing its validity. Describe the procedure used to estimate and distribute traffic with full DRI development in subzones at buildout and at interim phase-end years. These assignments may reflect the effects of any new road or improvements which are programmed in adopted capital improvements programs and/or comprehensive plans to be constructed during DRI construction; however, the inclusion of such roads should be clearly identified. Show these link projections on maps or tables of the study area network, one map or table for each phase-end year. Describe how these conclusions were reached.
- E. Assign the trips generated by this development as shown in (B) and (C) above and show, on separate maps or tables for each phase-end year, the DRI traffic on each link of the then-existing network within the study area. Include peak-hour directional trips. If local data is available, compare average trip lengths by purpose

QUESTION 22 – AIR

- A. Document the steps which will be taken to contain fugitive dust during site preparation and construction of the project. If site preparation includes demolition activities, provide a copy of any notice of demolition sent to the Florida Department of Environmental Regulation (FDER) as required by the National Emission Standards for Asbestos, 40 CFR Part 61, Subpart M.**

The project site is currently vacant with no structures on site. There will be no demolition activities proposed as part of the development. With respect to dust control during site preparation and construction, the Applicant and its contractors will adhere to all local and state regulations with respect to on-site dust control. This includes the implementation of water trucks to keep dust from migrating, as well as a robust Storm Water Pollution Prevention Plan that will include silt fence around the site to contain silt and dust from running off the site during storm events.

The following Questions will be addressed under the Transportation and Traffic Study performed by Leftwich Consulting to be submitted on December 15, 2015.

- B. Specify structural or operational measures that will be implemented by the development to minimize air quality impacts (e.g., road widening and other traffic flow improvements on existing roadways, etc.). Any roadway improvements identified here should be consistent with those utilized in Question 21, Transportation.**
- C. Complete Table 22-1 for all substantially impacted intersections within the study area, as defined in Map J, and all parking facilities associated with the project. Using the guidance supplied or approved by the Florida Department of Environmental Regulation, determine if detailed air quality modeling for carbon monoxide (CO) is to be completed for any of the facilities listed in the table.**

TABLE 22-1

PHASE: _____ (One table for each phase)

YEAR OF PHASE: ____ COMPLETION: _____

SOURCE TYPE(1)	PEAK HOUR TRAFFIC		MAXIMUM HOURLY SERVICE VOLUME (2)	
	PROJECTED	EXISTING	PROJECTED	EXISTING

--	--	--	--	--

- (1) Specify source type as either intersection, surface parking area, or parking deck. For each intersection provide an approach volume for each link. For each parking facility provide the total (incoming and outgoing) volume.
- (2) These should be compatible with maximum service volumes utilized in Question 21, Transportation.
- D. If detailed modeling is required, estimate the worst case one-hour and eight-hour CO concentrations expected for each phase through buildout for comparison with the state and federal ambient air quality standards. Utilize methodology supplied or approved by the Florida Department of Environmental Regulation for making such estimates. Submit all air quality modeling input and output data along with associated calculations to support the modeling and explain any deviations from guidance. Provide drawings of site geometry and coordinate information for each area modeled. Show the location of the sources and receptor sites. Modeling assumptions should consider federal, state, and local government programmed link and intersection improvements with respect to project phasing. Any roadway improvements utilized in the model should be consistent with those used in Question 21, Transportation. Provide verification of any assumptions in the modeling which consider such programmed improvements. It is recommended that air quality analyses be completed concurrently and in conjunction with the traffic analyses for the project.
- E. If initial detailed modeling shows projected exceedance(s) of ambient air quality standards, identify appropriate mitigation measures and provide assurances that appropriate mitigating measures will be employed so as to maintain compliance with air quality standards. Submit further modeling demonstrating the adequacy of such measures.

for the project and local jurisdiction. For the year of buildout and at the end of each phase estimate the percent impact, in terms of peak hour directional DRI trips/ total peak hour directional trips and in terms of peak hour directional DRI trips/ existing peak hour service volume for desired LOS, on each regionally significant roadway in the study area. Identify facility type, number of lanes and projected signal locations for the regionally significant roads.

- F. Based on the assignment of trips as shown in (D) and (E) above, what modifications in the highway network (including intersections) will be necessary at the end of each phase of development, to attain and maintain local and regional level of service standards? Identify which of the above improvements are required by traffic not associated with the DRI at the end of each phase. For those improvements which will be needed earlier as a result of the DRI, indicate how much earlier. Where applicable, identify Transportation System Management (TSM) alternatives (e.g., signalization, one-way pairs, ridesharing, etc.) that will be used and any other measures necessary to mitigate other impacts such as increased maintenance due to a large number of truck movements.
- G. Identify the anticipated number and general location of access points for driveways, median openings and roadways necessary to accommodate the proposed development. Describe how the applicant's access plan will minimize the impacts of the proposed development and preserve or enhance traffic flow on the existing and proposed transportation system. This information will assist the applicant and governmental agencies in reaching conceptual agreement regarding the anticipated access points. While the ADA may constitute a conceptual review for access points, it is not a permit application and, therefore, the applicant is not required to include specific design requirements (geometry) until the time of permit application.
- H. If applicable, describe how the project will complement the protection of existing, or development of proposed, transportation corridors designated by local governments in their comprehensive plans. In addition, identify what commitments will be made to protect the designated corridors such as interlocal agreements, right-of-way dedication, building set-backs, etc.
- I. What provisions, including but not limited to sidewalks, bicycle paths, internal shuttles, ridesharing and public transit, will be made for the movement of people by means other than private automobile? Refer to internal design, site planning, parking provisions, location, etc.

QUESTION 23 - HURRICANE PREPAREDNESS

A.

- 1. Identify any residential development proposed within the hurricane vulnerability zone delineated in the applicable regional hurricane evacuation study, regional public hurricane shelter study or adopted county peacetime emergency plan. If so, delineate the proposed development's location on the appropriate county and/or regional hurricane evacuation map and respond to questions B.(1) and B.(2) below. Proposed mobile home and park trailer developments should answer question B.(1), regardless of location, or answer questions B.(1) and B.(2) below, if proposed within the hurricane vulnerability zone or the high hazard hurricane evacuation area.**

There is no residential development proposed as part of this development.

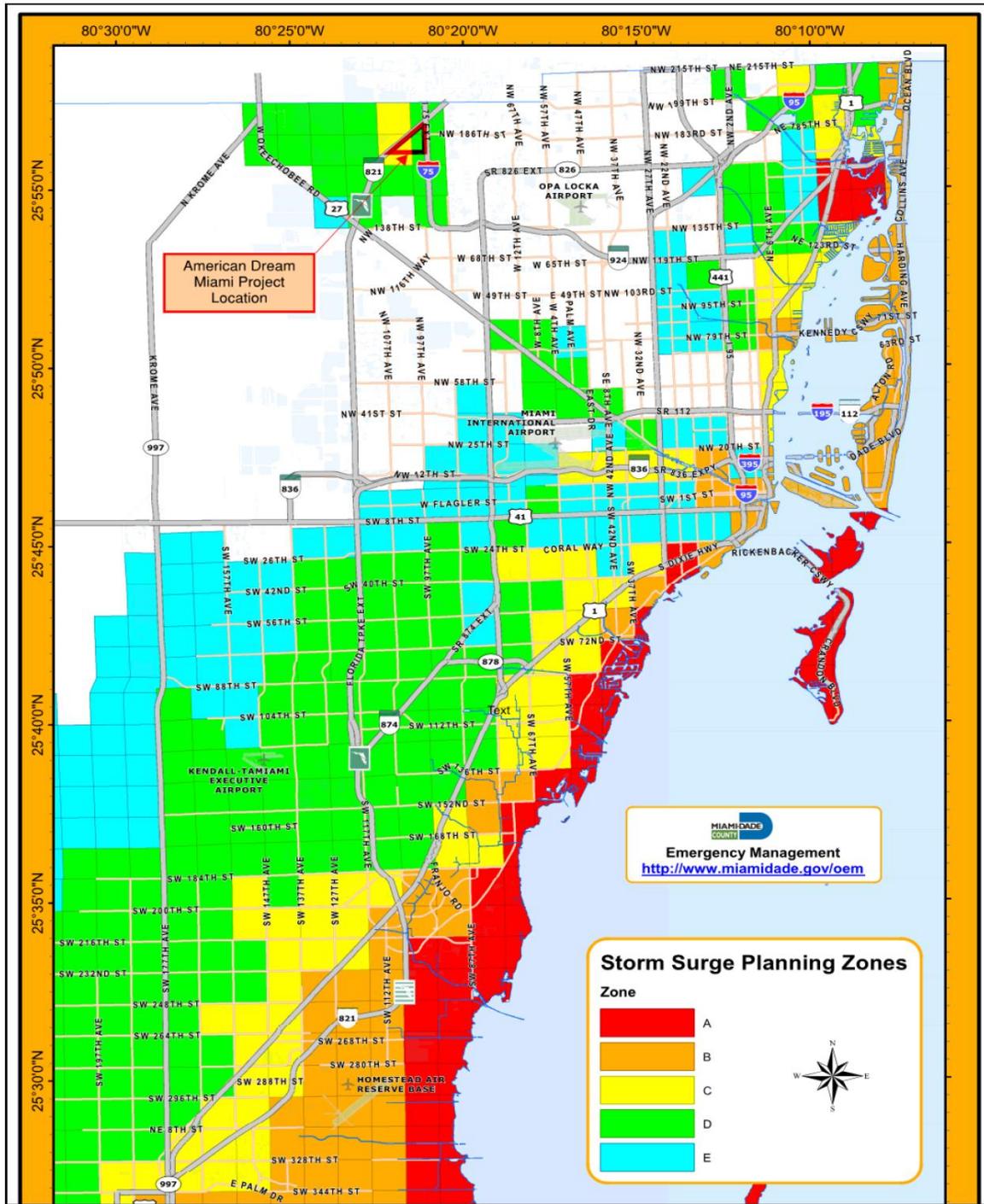
- 2. Identify any hotel/motel or recreational vehicle/travel trailer development proposed within the high hazard hurricane evacuation area delineated in the applicable regional hurricane evacuation study, regional public hurricane shelter study, or adopted county peacetime emergency plan. If present, delineate the proposed development's location on the appropriate county or regional hurricane evacuation map and answer questions B.(1) and B.(2) below.**

Hotels are proposed as part of this development. Their location is depicted on the Miami-Dade County hurricane evacuation zone map shown as figure 23-1.

- 3. Identify whether the proposed development is location in a designated special hurricane preparedness district.**

The proposed development is located partially in Zone C and Zone D of the Miami-Dade County Evacuation Zone Map. See figure 23-1 for a depiction of the development on the map.

AMERICAN DREAM MIAMI



23-1: Miami Dade County Storm Surge Planning/Evacuation Zone Map



B.

- 1. For each phase of the development, determine the development's public hurricane shelter space requirements based on the behavioral assumptions identified in the applicable regional study or county plan. Identify the existing public hurricane shelter space capacity during the one hundred year or category three hurricane event within the county where the development is being proposed and indicate whether the county has a deficit or surplus of public hurricane shelter space during the one hundred year or category three hurricane event.**

Due to the nature of this development as a destination entertainment and retail complex, International Atlantic does not anticipate that the development will generate additional demand for shelter space. The Applicant will have an emergency management plan as part of the overall operation of the complex and will include procedure for closing the entertainment and retail components of the development once a hurricane watch or warning is issued.

- 2. For each phase of the development, determine the number of evacuating vehicles the development would generate during a hurricane evacuation event based on the transportation and behavioral assumptions identified in the applicable regional study or county plan. Identify the nearest designated hurricane evacuation route and determine what percentage of level of service E hourly directional and maximum service volume the project will utilize. Identify and describe any action(s) or provisions that will be undertaken to mitigate impacts on hurricane preparedness.**

Pending completion of Traffic Study.

QUESTION 25 – POLICE AND FIRE PROTECTION

- A. If police/fire services, facilities or sites will be dedicated or otherwise provided on-site, describe them, specify any conditions of dedication and locate on Map H.**

The Applicant will offer a facility on site to house a Miami-Dade County Police Department Sub-Station within the main facility, as needed.

- B. Provide correspondence from the appropriate providers acknowledging notice of the proposed development and phasing, and indicating whether present facilities and manpower are capable of serving the project or specifying the additional manpower/equipment necessary to serve the development. If the provider is from another jurisdiction, the letter should also identify any non-facility-related problems in providing said service.**

Pending.

QUESTION 29 - ENERGY

- A. Provide a projection of the average daily energy demands at the end of each development phase for each of the following: electrical power, gas, oil, coal, etc. For electrical power, also provide the peak hour demand at the end of each phase.**

Below is table 29-1 which includes a calculation of the electrical power demands for the current American Dream Miami program.

Land Use	Unit	Area, sq. ft.	Power Use (Watts/sq.ft.)	Est. Electric Power Average Daily Demand (MW-hr) daily avg	Est. Electric Power Maximum Daily Demand (MW-hr) daily max
1. Retail	SQ. FT.	3,500,000	10	420.000	840.00
2. Entertainment	SQ. FT.	1,500,000	10	180.000	360.00
3. Common Area/Back of House	SQ. FT.	1,200,000	5	72.000	144.00
4. Hotel (keys)	ROOM	2,000	15kVA/room	30.000	60.00
	Totals:			702.000	1,404.000

- B. If there is to be an on-site electrical generating facility (post-construction) describe its proposed capacity and use.**

Approximate required capacity is 50 MW to provide power to facility. No on-site electrical generating facility is proposed, the power will be provided by FPL, see questions C.

- C. If energy (electrical power, natural gas, etc.) is to be obtained from an off-site source, attach a letter from the firms or agencies providing service outlining:**

The largest energy source required appears to be electrical power. At this time the developer anticipates that FPL will be provider of off-site electrical power to the development. Attached as exhibit 29-1 is a letter from FPL confirming the capacity to serve this development.

- 1. the projected excess capacities of the facilities and transmission line to which connection will be made at present and for each phase through completion of the project,**

Not Applicable.

- 2. any other commitments that have been made for this excess capacity,**

Not Applicable.

- 2. a statement of the supplier's ability to provide service at all times during and after development. (The supplier must be provided with demand information in (A) above.)**

Attached as Exhibit 29-1 is a letter from FPL confirming the capacity to serve this development.

- D. Describe any energy conservation methods or devices incorporated into the plan of development. What considerations relative to energy conservation will be incorporated into the site planning, landscape, and building design, and equipment and lighting selection for this project?**

Energy conservation methods that the developer will consider incorporating into the development include solar day lighting incorporated in the building design, energy efficient lighting fixtures, modern digital lighting control systems, Variable Frequency Drives (VFDs) to match electrical motors to loads, and close coordination with HVAC systems and building system for energy optimization.

Exhibit 29-1



Florida Power & Light Company

November 24, 2015

Miguel Diaz de la Portilla
200 South Biscayne Boulevard
Suite 3600
Miami, Florida 33131

Re: American Dream Miami Mall
V/O NW 97th AVE & 180th ST
Hialeah, FL 33018

Dear Miguel Diaz de la Portilla:

Thank you for contacting FPL early in your planning process. At the present time FPL has sufficient capacity to provide electric service to your property. We have facilities available currently available at this location.

Please advise me early in the planning process once the final plans have been approved. This information will help us to provide you with the best service in accordance with applicable rates, rules and regulations. You may also respond to us through www.fpl.com. Please contact me if you have any questions.

Sincerely

A handwritten signature in blue ink that reads "Jose Palomo". The signature is fluid and cursive, with a long horizontal stroke at the end.

FPL representative

Construction Project Manager

QUESTION 30 - HISTORICAL AND ARCHAEOLOGICAL SITES

A.

1. **Describe any known historical or archaeological sites on the development site. Provide a letter from the Department of State, Division of Historical Resources (DHR) which includes a list of known sites within the development site, the likelihood of historical or archaeological sites occurring within the development site, whether a site survey is needed, and whether any known sites are significant.**

A Phase I cultural resource assessment survey (CRAS) of the American Dream Miami property (the “Property”) in Miami-Dade County was conducted as due diligence by Archaeological Consultants, Inc. (ACI) on behalf of International Atlantic, LLC. Field survey was conducted in three separate phases between July 2014 and November 2015. At this time, the Department of State, Division of Historical Resources has not reviewed this project, nor requested a professional CRAS.

The purpose of this investigation was to locate and identify any archaeological sites and historic resources within the 233-acre Property and to assess their significance in terms of eligibility for listing in the National Register of Historic Places (NRHP). Although initiated as due diligence, this survey was conducted in conformity with the *National Environmental Policy Act (NEPA) of 1969*, and Section 106 of the *National Historic Preservation Act (NHPA) of 1966*, as amended, and the implementing regulations (36 CFR 800). The CRAS also complies with Chapters 267 and 373, *Florida Statutes (F.S.)*, as well as Florida’s Coastal Management Program and implementing state regulations regarding possible impact to significant historic properties. The field survey and report meet the standards contained in the Florida Division of Historical Resources’ (DHR) *Cultural Resource Management Standards and Operational Manual* (DHR 2003), and meets the specifications in Chapter 1A-46, *Florida Administrative Code (FAC)*.

Background research, which included a review of the Florida Master Site File (FMSF) and the NRHP, indicated that three previously recorded archaeological sites are located within the Property. 8DA01075, 8DA01080, and 8DA11875 are all black dirt middens located on tree islands; they each were determined eligible for listing in the NRHP by the Florida State Historic Preservation Officer (SHPO). Additionally, 8DA01075 was designated by Miami-Dade County as the Donna Camp Archaeological Zone. A review of relevant site location information for areas environmentally similar to the remainder of the property indicated a low probability for the occurrence of aboriginal archaeological sites. The potential for historic period archaeological sites also was considered unlikely. No previously recorded historic buildings are located within the Property, and

examination of the county property appraiser's office records indicated no potential for buildings or structures 50 years of age or older.

The archaeological field survey was designed to avoid impacts to the previously recorded sites. As a result of the archaeological investigations, no new archaeological sites were discovered, and no physical evidence of the previously recorded sites was found.

2. **If DHR recommends that a site survey be done, the results of such a survey, conducted for the development site by an acceptable professional, should be provided.**

The survey report, prepared in anticipation of the DHR request, is currently in preparation.

- B. **If significant historical or archaeological sites exist on-site, indicate what measures would be taken to protect them, or to minimize or mitigate impacts to them. Where appropriate, describe the measures for providing public access to the sites.**

Potential measures to protect, minimize or mitigate impacts to 8DA01075, 8DA01080, and 8DA11875 will be developed in consultation with the SHPO and other consulting parties following submittal of the CRAS Report.

QUESTION 32 – ATTRACTIONS AND RECREATION FACILITIES

The following Questions will be addressed under the Transportation and Traffic Study performed by Leftwich Consulting to be submitted on December 15, 2015.

- A. **What is the projected high, low, and average daily attendance at the facility? Specify the season if applicable. Complete Figures 32.1 - 32.3.**

- B. **Estimate the number of customers utilizing transportation other than automobile to reach the region and the site. Specify the transportation systems and facilities to be utilized, their location, present and planned capacities.**

- C. **If any transportation systems and facilities are to be owned, operated, or managed by the applicant, specify how these interface with other systems and facilities in the region.**

**APPLICATION NO. 2
STANDARD AMENDMENT APPLICATION**

Applicant	Applicant's Representative
The Graham Companies	Tracy R. Slavens, Esq., & Joseph G. Goldstein, Esq. Holland & Knight, LLP 701 Brickell Avenue, Suite 3000 Miami, Florida 33131 (305) 789-7642

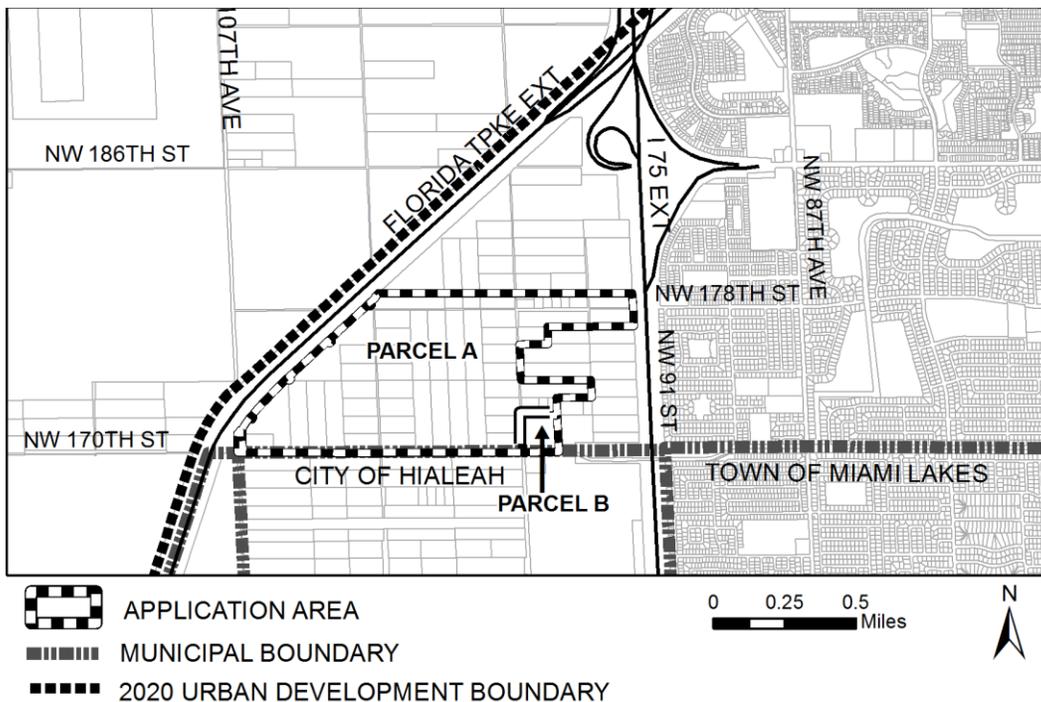
Requested Amendment to the CDMP LUP map and text:

1. Redesignate the application site on the Land Use Plan map:
 From: Parcel A: "Industrial and Office" (329 acres) and
 Parcel B: "Business and Office" (10 acres)
 To: "Business and Office" and "Employment Center"
2. Release the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of land within the subject property; and
3. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board.

Location: East of the HEFT and west of I-75 between NW 170 and NW 180 Streets.

Acreage: Application Area: ±339 Gross; ±323.6 Net

Acreage Owned by Applicant: ±309 Gross



Notes:

1. This page is not part of the Application that was filed by the applicant.
2. The Disclosure of Interest published herein contains only those applicable pages; all others were deleted.

**APPLICATION FOR AN AMENDMENT
TO THE MIAMI-DADE COUNTY
COMPREHENSIVE DEVELOPMENT MASTER PLAN**

2015 NOV 30 P 4: 31
PLANNING & ZONING
METROPOLITAN PLANNING SECT

1. APPLICANT

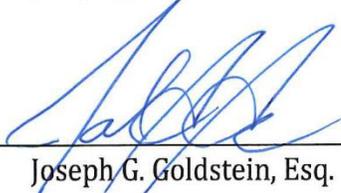
The Graham Companies
6843 Main Street
Miami Lakes, Florida 33014

2. APPLICANTS' REPRESENTATIVE

Tracy R. Slavens, Esq.
Holland & Knight LLP
701 Brickell Avenue, Suite 3300
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(305) 789-7642
(305) 789-7799 (fax)
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joseph.goldstein@hklaw.com

By:  11-30-15
Tracy R. Slavens, Esq. Date

By:  11/30/15
Joseph G. Goldstein, Esq. Date

3. DESCRIPTION OF REQUESTED CHANGE

A. Following changes to the Land Use Element are being requested.

- i. The re-designation of approximately 339± gross acres of land within the subject property from "Industrial and Office" and "Business and Office" to "Business and Office" and "Employment Center."
- ii. The release of the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of land within the subject property.
- iii. The acceptance of a proffered declaration of restrictions on the subject property to limit the development program as described hereinafter.

B. Description of the Subject Area.

The subject property consists of approximately 339± gross acres of land located in Sections 8 and 9, Township 52, Range 40, of unincorporated Miami-Dade County, Florida (the "Property" and also hereinafter referred to as the "Graham Application Area"). More specifically, the Property is located east of the Homestead Extension of Florida's Turnpike ("HEFT") and west of Interstate 75 ("I-75") between NW 170 Street and NW 180 Street. A sketch and legal description of the Property are provided as Exhibit A-1.

The subject property of request A.ii. consists of approximately 280± gross acres of land located north of NW 170 Street between NW 97 Avenue and the HEFT and is more specifically described on the sketch provided as Exhibit A-2 (the "Graham Triangle").

C. Acreage.

Subject application area: 339± gross acres
Acreage owned by Applicants: 309± gross acres

D. Requested Change.

- i. It is requested that the Graham Application Area be redesignated on the Land Use Plan Map from "Industrial and Office" and "Business and Office" to "Business and Office" and "Employment Center."
- ii. It is requested that the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, is released as it applies to the Graham Triangle.
- iii. It is requested that the proffered declaration of restrictions limiting the development program for the Graham Application Area be accepted by Miami-Dade County.

4. REASONS FOR AMENDMENT

The Graham Application Area is a large area of vacant land located in Sections 8 and 9, Township 52, Range 40, in unincorporated Miami-Dade County. The Graham Application Area is located in the North Central Tier of the County intersecting with, near, or abutting (a) two section line roads: NW 97 Avenue and NW 170 Street; and (b) two expressways: the HEFT and I-75. The Property is located within Minor Statistical Area ("MSA") 3.1, which is largely undeveloped. The MSA encompasses a wide area of western Miami-Dade County and contains all types of land uses. The developable areas within its boundaries lie generally between the Urban Development Boundary, US-27/Okeechobee Road, NW 57 Avenue, and NW 103 Street.

Redesignation of the Graham Application Area

The portion of the Graham Application Area located west of NW 97 Avenue is within the Graham Triangle. The Graham Triangle was part of CDMP Amendment Application No. 5 of the April 2005 Cycle (the "2005 Amendment"). The 2005 Amendment expanded the Urban Development Boundary ("UDB") to include 1,140.8± acres of land and redesignated said lands from "Open Land" to "Industrial and Office" on the CDMP Land Use Plan Map. The 2005 Amendment was intended to add new industrial lands to the Countywide inventory and address a deficiency in land supply. A portion of this land, south of the Graham Application Area and located within the City of Hialeah, is planned as an industrial and office park known as the Beacon Countyline project. The remainder of the 2005 Amendment subject property, which includes the Graham Triangle, is undeveloped. The parcel of land lying directly to the north of the Graham Application Area has been identified as the new location for the American Dream Miami entertainment retail complex ("American Dream"). The area east of I-75 is predominantly developed with single-family residential use.

The Applicant is seeking to redesignate the Graham Application Area as proposed in order to expand the uses permitted on the property. Currently, the Graham Application Area is designated "Business and Office" and, mostly, "Industrial and Office," which allows manufacturing operations, maintenance and repair facilities, warehouses, mini-warehouses, office buildings, wholesale showrooms, distribution centers, and similar uses. Based on the pattern of development in the surrounding areas and American Dream,¹ the Applicant has determined that it is appropriate to redesignate the land to a category that allows a wider range of permitted uses, better promotes infill development, and provides more of a transition between the varied character of uses in the surrounding area.

The Applicant is proposing the redesignation of the Graham Application Area to "Business and Office" and "Employment Center." This proposed redesignation maintains the ability of the Applicant to develop industrial uses while incorporating the ability to integrate other compatible uses and to encourage a balanced mix of these uses across its 339± acres. The "Business and Office" category accommodates the full range of sales and service activities, which includes retail, wholesale, personal and professional services, call centers, commercial and professional offices, hotels, motels, hospitals, medical buildings, nursing homes, entertainment and cultural facilities, amusements and commercial recreation establishments. Residential uses, and mixing of residential use with commercial, light industrial, office and hotels are also permitted in Business and Office areas. The "Employment Center" designation encourages the integrated development of business, office, light industrial, and residential uses. The CDMP Land Use Element provides that "[e]mployment centers are intended to create a synergistic relationship between industries that rely on one another for the exchange of goods, ideas and services and allow for the efficient use of shared resources and infrastructure." See I-41. An "Employment Center" is "intended to create an environment that connects industries with

¹ A companion application for an amendment to the CDMP is being filed during this cycle by the representatives of American Dream. The scope of development proposed for American Dream is the basis of the development program contemplated by this Amendment.

customers and the local workforce.” *Id.* The proposed redesignation of the Graham Application Area will encourage integrated mixed-use infill development that will be responsive to and supportive of the industrial and office uses to the south, residential uses to the east, and commercial and entertainment uses to the north.

The density and intensity of development within the Graham Application Area will be regulated by the CDMP Land Use Element “Business and Office” residential density guidelines, which, in relevant part, calculate the maximum allowable residential density that exists or which the CDMP allows across the roadway. In this case, the applicable maximum residential density is based on the existing Low-Medium Density Residential designation on the lands located on the south side of NW 170 Street abutting the southeast corner of the Graham Application Area. This yields a maximum density of 4,407 dwelling units.² The maximum non-residential intensity allowed for development within the Graham Triangle is set forth by the CDMP Land Use Element as follows:

For the area bounded by NW 154 Street on the south, NW 97 Avenue on the east, and the Homestead Extension of the Florida Turnpike (HEFT) on the northwest, the maximum allowable intensity under the CDMP shall be a FAR of 0.45, pursuant to the 2006 Settlement Agreement between the State of Florida and Miami-Dade County [Docket No. DCA 06-1-NOI-1301-(A)-(N)] pertaining to adopted April 2005 CDMP amendment Application No. 5. *See* I-24.

The maximum non-residential intensity for the remaining subject property is FAR 1.25. *See* I-24. As such, the maximum non-residential development intensity is 8,735,958 square feet.³ In the event that it is determined that the adjacent Low-Medium Density Residential designation is not across the roadway, then the maximum density proposed by the Applicant would still comply with the FAR restriction. Thus, assuming an average multi-family unit size of 1,000 square feet, then 4,735 units would be permitted.⁴ The Applicant intends to develop the Graham Application Area with 2,000 multi-family rental dwelling units, 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use.

The “Business and Office” category provides that an “Employment Center” may be approved on “Business and Office” designate properties that meet the following: 1) are located inside the UDB, 2) contain a minimum of 10 acres, and 3) have direct access to a Major Roadway, as identified on the CDMP Land Use Plan Map. The Graham Application Area meets all three of these criteria. The Graham Application Area consists of 339± acres and will have access to a number of major roadways including NW 97 Avenue and anticipated connections to I-75 and HEFT. The uses within the “Employment Center” will be developed in such a manner as to safeguard compatibility with adjacent uses. The Applicant will comply with the “Employment Center” design guidelines set forth by the CDMP Land Use Element. Light industrial uses will not detrimentally impact adjacent

² 4,407 dwelling units = 339 acres x 13 dwelling units per acre

³ 8,735,958 square feet = (279 acres x 43,560 sq. ft. x FAR 0.45) + (60 acres x 43,560 sq. ft. x FAR 1.25)

⁴ 4,735 units = 8,735,958 square feet – 4,000,000 square feet non-residential / 1,000 square feet per unit

development and residential uses will be designed in such a way so as to promote pedestrian mobility and to protect residents from any impacts of the industrial development components in order to create an environment that is accommodating to consumers, residents and employees.

The proposed Amendment furthers Land Use Element Policy 9B, which encourages that amendments i) satisfy a deficiency in the Plan map to accommodate projected population or economic growth of the County; ii) enhance or impede provision of services at or above adopted LOS Standards; iii) be compatible with abutting and nearby land uses and protect the character of established neighborhoods; and iv) enhance or degrade environmental or historical resources, features or systems of County significance. The Amendment will serve to better accommodate the demand for a balanced mix of industrial, commercial, and residential lands within this portion of the County with appropriately scaled infill development. The development of the Graham Application Area, along with the adjacent American Dream parcel will bring infrastructure and services to the area. The uses proposed by the Applicant will be developed in such a way that will be wholly supportive of, complementary to, and compatible and consistent with the character of the areas surrounding the Graham Application Area. The Amendment will not have an adverse impact on environmental or historical resources, features or systems of County significance. A detailed analysis of the Amendment's anticipated impacts on infrastructure levels of service, and environmental and historical resources is provided in Exhibit F to the Application.

Based on these factors, the redesignation of the Graham Application Area from "Industrial and Office" to "Business and Office" and "Employment Center" is appropriate and should be approved.

Release of the Declaration of Restrictions, Recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, and Acceptance of the Proffered Declaration of Restrictions.

In 2006, the Applicant proffered that certain Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, in connection with the approval of the redesignation of the Graham Triangle pursuant to CDMP Amendment Application No. 5 of the April 2005 Cycle from "Open Land" to "Industrial and Office." This Declaration of Restrictions prohibits residential use within the Graham Triangle Area and limits development of the land to uses generating no more than 2,582 net external P.M. peak hour trips. The proposed redesignation of the Graham Application Area to "Business and Office" and "Employment Center" and the Applicant's intent to develop a portion of the Graham Application Area with up to 2,000 multi-family rental dwelling units would require the release of this previously recorded Declaration of Restrictions.

The Applicant intends to impose new conditions on the development of the Graham Application Area in the event that the request for its redesignation to "Business and Office" and "Employment Center" is approved. As such, the Applicant is requesting a release of the

Declaration of Restrictions recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida and acceptance of the new Declaration of Restrictions that is being proffered by the Applicant. The Declaration of Restrictions being proffered would limit the development program within the Graham Application Area to 2,000 multi-family rental dwelling units, 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. No “for sale” residential use will be permitted under the terms of the declaration of restrictions. The proposed development program density and intensity are consistent with the FAR limitation of 0.45 and applicable residential density, as well as with requested redesignation and intent of the “Employment Center” overlay. The limitation of uses will ensure that the Graham Application Area is developed in a manner that will ensure infrastructure concurrency.

Consistency with CDMP Goals, Objectives, and Policies

The approval of the requested Amendment would further implementation of the following CDMP goals, objectives, and policies:

OBJECTIVE 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.

LAND USE POLICY 1A: High intensity, well-designed urban centers shall be facilitated by Miami-Dade County at locations having high countywide multimodal accessibility.

LAND USE POLICY 1B: Major centers of activity, industrial complexes, regional shopping centers, large-scale office centers, and other concentrations of significant employment shall be the structuring elements of the metropolitan area and shall be sited on the basis of metropolitan-scale considerations at locations with good countywide, multi-modal accessibility.

LAND USE POLICY 1C: Miami-Dade County shall 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 all necessary urban services and facilities are projected to have capacity to accommodate additional demand.

LAND USE POLICY 1G: Business developments shall preferably be placed in clusters or nodes in the vicinity of major roadway intersections, and not in continuous strips or as isolated spots, with the exception of small neighborhood nodes. Business developments shall be designed to relate to adjacent development, and large uses should be planned and designed to serve as an anchor for adjoining smaller businesses or the adjacent business district. Granting of commercial or other non-residential zoning by the County is not necessarily warranted on a given property by virtue of nearby or adjacent roadway construction or expansion, or by its location at the intersection of two roadways.

LAND USE POLICY 10: Miami-Dade County shall seek to prevent discontinuous, scattered development at the urban fringe particularly in the Agricultural Areas, through its CDMP amendment process, regulatory and capital improvements programs, and intergovernmental coordination activities.

LAND USE POLICY 1T. Miami-Dade County through its land development regulations shall encourage developments that promote and enhance bicycling and pedestrianism through the provision of bicycle and pedestrian facilities and other measures such as building design and orientation, and shall discourage walled and gated communities.

LAND USE POLICY 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), except as otherwise provided in the "Concurrency Management Program" section of the CIE.

LAND USE POLICY 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.

LAND USE POLICY 4C. Residential neighborhoods shall be protected from intrusion by uses that would disrupt or degrade the health, safety, tranquility, character, and overall welfare of the neighborhood by creating such impacts as excessive density, noise, light, glare, odor, vibration, dust or traffic.

LAND USE POLICY 4D. Uses which are supportive but potentially incompatible shall be permitted on sites within functional neighborhoods, communities or districts only where proper design solutions can and will be used to integrate the compatible and complementary elements and buffer any potentially incompatible elements.

LAND USE POLICY 5B: All development orders authorizing a new land use or development, or redevelopment, or significant expansion of an existing use shall be contingent upon an affirmative finding that the development or use conforms to, and is consistent with the goals, objectives and policies of the CDMP including the adopted LUP map and accompanying "Interpretation of the Land Use Plan Map". The Director of the Department of Regulatory and Economic Resources shall be the principal administrative interpreter of the CDMP.

LAND USE OBJECTIVE 7: Miami-Dade County shall require all new development and redevelopment in existing and planned transit corridors and urban centers to be planned and designed to promote transit-oriented development (TOD), and transit use, which mixes residential, retail, office, open space and public uses in a safe, pedestrian and bicycle friendly environment that promotes mobility for people of all ages and abilities through the use of rapid transit services.

LAND USE POLICY 7D: Redevelopment of property within one-half mile of existing or planned mass transit stations and bus routes shall not cause an increase in walking distances from nearby areas to the transit services and shall, wherever practical, be done by establishing blocks of walkable scale that form an interconnected network of streets, maximizing connectivity with existing streets and promoting a comfortable and attractive environment for pedestrians of all ages and abilities.

LAND USE POLICY 8B: Distribution of neighborhood or community-serving retail sales uses and personal and professional offices throughout the urban area shall reflect the spatial distribution of the residential population, among other salient social, economic and physical considerations.

LAND USE POLICY 8E: Applications requesting amendments to the CDMP Land Use Plan map shall be evaluated for consistency with the Goals, Objectives and Policies of all Elements, other timely issues, and in particular the extent to which the proposal, if approved, would:

- i) Satisfy a deficiency in the Plan map to accommodate projected population or economic growth of the County;
- ii) Enhance or impede provision of services at or above adopted LOS Standards;
- iii) Be compatible with abutting and nearby land uses and protect the character of established neighborhoods; and
- iv) Enhance or degrade environmental or historical resources, features or systems of County significance; and
- v) If located in a planned Urban Center, or within 1/4 mile of an existing or planned transit station, exclusive busway stop, transit center, or standard or express bus stop served by peak period headways of 20 or fewer minutes, would be a use that promotes transit ridership and pedestrianism as indicated in the policies under Objective LU-7, herein.

LAND USE POLICY 9D: Miami-Dade County shall continue to investigate, maintain and enhance methods, standards and regulatory approaches which facilitate sound, compatible mixing of uses in projects and communities.

LAND USE POLICY 9E: Miami-Dade County shall enhance and formalize its standards for defining and ensuring compatibility among proximate uses, and requirements for buffering.

LAND USE POLICY 90: Miami-Dade County shall revise land development regulations to allow live-work units and structures in urban centers and all land use categories that permit the mixture of residential and non-residential uses. Live-work refers to one or more individuals living in the same building where they earn their livelihood usually in professional, artisanal or light industrial activities. The quiet enjoyment expectations of the residential neighbors take precedence over the work needs in a live-work unit or building.

Toward this end, the occupational use of the unit shall not include non-resident employees or walk-in trade. No outdoor activity; noise, vibration, odor, electric interference or other effect of the occupation shall be detectable outside the live-work unit. The regulations should provide for disclosure of neighboring industrial and commercial activities to prospective residential tenants and purchasers.

LAND USE POLICY 9P: Miami-Dade County shall revise land development regulations to allow work-live units in the Business and Office and Industrial and Office land use categories. The term work-live means that the needs of the work component takes precedence over the quiet expectations of residents, in that there may be noise, odors, or other impacts of the business, as well as employees, walk-in trade or sales. The predominant use of a work-live unit is industrial or commercial work activity and residential activity is secondary.

LAND USE POLICY 9T: The County shall consider provisions to allow horizontal mixed-use developments, defined as the horizontal integration of parcels with different primary uses within the same site or block, in appropriate future land use categories in the Urban Development Boundary.

LAND USE OBJECTIVE 10: Energy efficient development shall be accomplished through metropolitan land use patterns, site planning, landscaping, building design, and development of multi-modal transportation systems (Energy Efficiency/Conservation).

LAND USE POLICY 10A: Miami-Dade County shall facilitate contiguous urban development, infill, redevelopment of substandard or underdeveloped urban areas, moderate to high intensity activity centers, mass transit supportive development, and mixed-use projects to promote energy conservation. To facilitate and promote such development Miami-Dade County shall orient its public facilities and infrastructure planning efforts to minimize and reduce deficiencies and establish the service capacities needed to support such development.

5. ADDITIONAL MATERIAL SUBMITTED

Additional information will be supplied at a later date under separate cover.

6. COMPLETED FORMS

- Attachments: Sketches and Legal Descriptions of Property and Parcels – Composite Exhibit A
- Disclosure of Interest Form – Exhibit B
- Location Map for Application – Exhibit C
- Aerial Photographs – Exhibit D
- Section Sheets – Exhibit E
- Supplemental Analysis – Exhibit F

COMPOSITE EXHIBIT A

Sketches and Legal Descriptions of Property and Parcels

EXHIBIT A-1

Graham Application Area

LEGAL DESCRIPTION OF GRAHAM APPLICATION PROPERTY

(Sheet 1 of 4 Sheets)

A portion of Tracts 8, and 20 through 24, inclusive, of the Northeast 1/4 of Section 8, Township 52 South, Range 40 East; together with all of Tracts 1 through 24, inclusive, of the Southeast 1/4 of said Section 8, Township 52 South, Range 40 East; also together with a portion of Tracts 1, 2, 9 through 12, inclusive, Tracts 17 through 21, inclusive, and all of Tracts 3 through 8, inclusive, Tracts 22 through 24, inclusive, of the Southwest 1/4 of said Section 8, Township 52 South, Range 40 East; also together with a portion of Tract 8, of the Northwest 1/4 of said Section 8, Township 52 South, Range 40 East; also together with that portion of the 10 foot wide right-of-way lying within the limits of the herein described parcel; also together with that portion of the 60 foot wide canal right-of-way as recorded in Official Records Book 5139 at Page 103, lying within the limits of the herein described parcel; all according to the plat of "Chambers Land Company Subdivision", as recorded in Plat Book 2, at Page 68; also together with a portion of Tracts 24 and 25 of the Northwest 1/4 of said Section 9, Township 52 South, Range 40 East; also together with a portion of Tracts 33, 41 through 43, inclusive, 47, and all of Tracts 44 and 48, of the Southwest 1/4 of said Section 9, Township 52 South, Range 40 East; subject to that portion of the 15 foot wide road reservation lying within the limits of the herein described parcel; according to the plat of "Florida Fruit Lands Company's Subdivision No. 1", as recorded in Plat Book 2 at Page 17, all of the Public Records of Miami-Dade County, Florida, being more particularly described as follows:

Commence at the Southeast corner of the Southwest 1/4 of said Section 9; thence South 89 degrees 28 minutes 37 seconds West, along the South line of the said Southwest 1/4 of said Section 9, for 1980.94 feet to the Point of Beginning of the following described parcel; thence continue South 89 degrees 28 minutes 37 seconds West, along the last described course, for 660.31 feet to the Southwest corner of said Section 9; said corner also being the Southeast corner of said Section 8; thence South 89 degrees 41 minutes 50 seconds West, along the South line of said Section 8, for 5284.61 feet to the Southwest corner of said Section 8; thence North 02 degrees 37 minutes 33 seconds West, along the West line of the said Southwest 1/4 of said Section 8, for 347.26 feet to a point on the next described circular curve; said point bears North 57 degrees 41 minutes 53 seconds West from the radius point of the following described circular curve; thence Northeasterly, along said circular curve to the right, having a radius of 4365.35 feet and a central angle of 15 degrees 09 minutes 34 seconds for an arc distance of 1154.99 feet to a Point of Tangency; thence North 47 degrees 27 minutes 37 seconds East for 2533.14 feet; said last described three courses being coincident with the Southeasterly limited access right-of-way line of State Road No. 821 (Homestead Extension of the Florida Turnpike), as shown on the State of Florida Department of Transportation Right-of-Way Map Section 87005 Contract 2313 approved September, 1970, last revised November 1, 1971 (Sheets 1 through 5); thence North 89 degrees 37 minutes 45 seconds East for 4743.49 feet; thence South 02 degrees 36 minutes 44 seconds West, along the Westerly right-of-way line of Interstate 75 (State Road 93), as shown on the State of Florida Department of Transportation Right-of-Way Map Section 87075-2402, approved July 5, 1977, last revised December 1, 1978 (Sheets 1 through 10) for 622.09 feet;

LEGAL DESCRIPTION OF GRAHAM APPLICATION PROPERTY

(Sheet 2 of 4 Sheets)

thence South 89 degrees 33 minutes 22 seconds West, along the South line of said Tracts 33 and 48 of the said Southwest 1/4 of said Section 9 for 1620.91 feet; thence South 02 degrees 36 minutes 53 seconds East, along a line that is parallel with and 549.12 feet East of, as measured at right angles to, the West line of the said Southwest 1/4 of said Section 9, for 329.95 feet; thence South 89 degrees 32 minutes 42 seconds West, along the South line of said Tract 47 of the said Southwest 1/4 of said Section 9, for 549.51 feet; thence South 02 degrees 36 minutes 53 seconds East, along the West line of the said Southwest 1/4 of said Section 9, for 660.11 feet; thence North 89 degrees 31 minutes 20 seconds East, along the North line of said Tract 44 of the said Southwest 1/4 of said Section 9, for 1320.61 feet; thence South 02 degrees 37 minutes 01 seconds East, along the East line of said Tract 44 of the said Southwest 1/4 of said Section 9, for 329.79 feet; thence South 89 degrees 30 minutes 39 seconds West, along the South line of said Tract 44 of the said Southwest 1/4 of said Section 9, for 660.31 feet; thence South 02 degrees 36 minutes 57 seconds East, along the East line of the West 1/2 of said Tracts 43 through 41, inclusive and respectively, of the said Southwest 1/4 of said Section 9, for 989.77 feet to the Point of Beginning; all lying and being in Miami-Dade County, Florida.

LESS AND EXCEPTING THEREFROM: (Well Sites and Access Road)

All of that certain parcel entitled Well Sites and Access Road as described in Exhibit "A" of the Special Warranty Deed as recorded in Official Records Book 28776 at Page 2457 of the Public Records of Miami-Dade County, Florida, being further described as follows:

A strip of land for well sites and access road purposes. In that portion of Section 8, Township 52 South, Range 40 East, Miami-Dade County, Florida, lying 60 feet East of the West line of said Section 8 and Southeasterly of the Southeasterly Right of Way line of State Road No. 821, Homestead Extension of Florida's Turnpike, more particularly described as follows:

Commence at the Southwest corner of Section 8, Township 52 South, Range 40 East; thence North 89 degrees 41 minutes 47 seconds East, along the South line of said Section 8 for a distance of 60.05 feet; thence North 02 degrees 37 minutes 46 seconds West, for a distance of 60.06 feet to a point on the North line of 60 feet Canal right-of-way recorded in O.R.B. 5139, Page 103, also being the Point of Beginning; thence continue North 02 degrees 37 minutes 46 seconds West, along a line 60 feet East of and parallel with the West line of said Section 8, for a distance of 373.43 feet to intersect with a non tangent circular curve concave Southeasterly, also being the Southeasterly right-of-way line of State Road No. 821, Homestead Extension of Florida's Turnpike, at which point the radial bears South 56 degrees 19 minutes 50 seconds East; thence along said circular curve, having for its elements a radius of 4365.66 feet, a central angle of 13 degrees 47 minutes 07 seconds and an arc distance of 1050.37 feet to a Point of Tangency; thence North 47 degrees 27 minutes 17 seconds East, along said Southeasterly right-of-way line of the State Road No. 821 for a distance of 2481.17 feet; thence South 42 degrees 32 minutes 43 seconds East for a distance of 25.00 feet; thence South 47 degrees 27 minutes 17 seconds West, along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way

LEGAL DESCRIPTION OF GRAHAM APPLICATION PROPERTY

(Sheet 3 of 4 Sheets)

line of the State Road No. 821, for a distance of 147.00 feet; thence south 42 degrees 32 minutes 43 seconds East for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, for a distance of 50.00 feet; thence North 42 degrees 32 minutes 43 seconds West, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, for a distance of 969.56 feet; thence South 42 degrees 32 minutes 43 seconds East, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, for a distance of 50.00 feet; thence North 42 degrees 32 minutes 43 seconds West for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, for a distance of 969.56 feet; thence South 42 degrees 32 minutes 43 seconds East, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, for a distance of 50.00 feet; thence North 42 degrees 32 minutes 43 seconds West, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, for a distance of 245.05 feet to a Point of Curvature of a circular curve concave Southeasterly; thence along said circular curve 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, having for its elements a radius of 4340.66 feet, a central angle of 9 degrees 28 minutes 51 seconds and an arc distance of 718.25 feet; thence South 51 degrees 53 minutes 44 seconds East, for a distance of 50.00 feet; thence South 37 degrees 38 minutes 14 seconds West for a distance of 50.00 feet; thence North 51 degrees 53 minutes 44 seconds West, for a distance of 50.00 feet to a point of a non tangent circular curve concave Southeasterly and 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, Homestead Extension of Florida's Turnpike, at which point the radial bears South 52 degrees 41 minutes 10 seconds East; thence along said circular curve, having for its elements a radius of 4340.66 feet, a central angle of 2 degrees 27 minutes 36 seconds and an arc distance of 186.37 feet; thence South 23 degrees 22 minutes 18 seconds West, for a distance of 25.48 feet to a point of a non tangent circular curve concave Southeasterly and 30 feet Southeasterly of and parallel with aforesaid Southeasterly right-of-way line of the State Road No. 821, Homestead Extension of Florida's Turnpike, at which point the radial bears South 55 degrees 28 minutes 34 seconds East; thence along said circular curve, having for its elements a radius of 4335.66 feet, a central angle of 0 degrees 43 minutes 29 seconds and an arc distance of 54.84 feet; thence South 02 degrees 37 minutes 46 seconds East along a line 90 feet East of and parallel with the West line of Section 8, for a distance of 339.77 feet; thence North 89 degrees 41 minutes 48 seconds East, for a distance of 15.01 feet; thence South 02 degrees 37 minutes 46 seconds East, for a distance of 25.02 feet; thence South 89 degrees 41 minutes 48 seconds West, along the North line of 60 feet Canal right-of-way recorded in O.R.B. 5139, Page 103, for a distance of 45.04 feet to the Point of Beginning.

Containing 109,900 Square Feet or 2.52 Acres, more or less, by calculations.

LEGAL DESCRIPTION OF GRAHAM APPLICATION PROPERTY
(Sheet 4 of 4 Sheets)

NOTE: The “Less and Excepting Therefrom” portion of this Legal Description is a restatement of the Legal Description entitled “Well Sites and Access Road” contained in the herein referenced Official Records Book 28776 at Page 2457.

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Exhibit A-2

Graham Triangle

Exhibit B

Disclosure of Interest Form

EXHIBIT "B"
DISCLOSURE OF INTEREST

This form or a facsimile must be filed by all applicants having an ownership interest in any real property covered by an application to amend the Land Use Plan map. Submit this form with your application. Attach additional sheets where necessary.

1. APPLICANT(S) NAME AND ADDRESS:

APPLICANT: The Graham Companies
6843 Main Street
Miami Lakes, Florida 33014

Use the above alphabetical designation for applicants in completing Sections 2 and 3, below.

2. PROPERTY DESCRIPTION: Provide the following information for all properties in the application area in which the applicant has an interest. Complete information must be provided for each parcel.

<u>APPLICANT</u>	<u>OWNER OF RECORD</u>	<u>FOLIO NUMBER</u>	<u>SIZE IN ACRES</u>
<u>SEE ATTACHED EXHIBIT B-1</u>			

3. For each applicant, check the appropriate column to indicate the nature of the applicant's interest in the property identified in 2., above.

<u>APPLICANT</u>	<u>OWNER</u>	<u>LESSEE</u>	<u>CONTRACTOR FOR PURCHASE</u>	<u>OTHER (Attach Explanation)</u>
<u>X</u>	<u>X</u>			

4. DISCLOSURE OF APPLICANT'S INTEREST: Complete all appropriate sections and indicate N/A for each section that is not applicable.

- a. **If the applicant is an individual (natural person) list the applicant and all other individual owners below and the percentage of interest held by each.**

<u>INDIVIDUAL'S NAME AND ADDRESS</u>	<u>PERCENTAGE OF INTEREST</u>
<u> </u>	

- b. If the applicant is a CORPORATION, list the corporation's name, the name and address of the principal stockholders and the percentage of stock owned by each. [Note: where the principal officers or stockholders, consist of another corporation (s), trustee(s), partnership(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity.]

CORPORATION NAME: THE GRAHAM COMPANIES

<u>NAME, ADDRESS, AND OFFICE (if applicable)</u>	<u>PERCENTAGE OF STOCK</u>
<u>SEE ATTACHED EXHIBIT B-2</u>	

- c. If the applicant is a TRUSTEE, list the trustee's name, the name and address of the beneficiaries of the trust, and the percentage of interest held by each. [Note: where the beneficiary/beneficiaries consist of corporation(s), partnership(s), or other similar entities, further disclosure shall be required which discloses the identity of the individual (s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

TRUSTEES NAME: _____

<u>BENEFICIARY'S NAME AND ADDRESS</u>	<u>PERCENTAGE OF INTEREST</u>

- d. If the applicant is a PARTNERSHIP or LIMITED PARTNERSHIP, list the name of the partnership, the name and address of the principals of the partnership, including general and limited partners and the percentage of interest held by each partner. [Note: where the partner(s) consist of another partnership(s), corporation(s) trust(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

PARTNERSHIP NAME: _____

<u>NAME AND ADDRESS OF PARTNERS</u>	<u>PERCENTAGE OF INTEREST</u>

- e. If the applicant is party to a CONTRACT FOR PURCHASE, whether contingent on this application or not, and whether a Corporation, Trustee, or Partnership, list the names of the contract purchasers

below, including the principal officers, stockholders, beneficiaries, or partners. [Note: where the principal officers, stockholders, beneficiaries, or partners consist of another corporation, trust, partnership, or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

NAME AND ADDRESS

PERCENTAGE OF INTEREST

Date of Contract _____

If any contingency clause or contract terms involve additional parties, list all individuals or officers if a corporation, partnership, or trust.

5. **DISCLOSURE OF OWNER'S INTEREST:** Complete only if an entity other than the applicant is the owner of record as shown on 2.a., above.

- a. If the owner is an individual (natural person) list the applicant and all other individual owners below and the percentage of interest held by each.

INDIVIDUAL'S NAME AND ADDRESS

PERCENTAGE OF INTEREST

- b. If the owner is a CORPORATION, list the corporation's name, the name and address of the principal stockholders and the percentage of stock owned by each. [Note: where the principal officers or stockholders consist of another corporation(s), trustee(s) partnership(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity.]

CORPORATION NAME _____

NAME, ADDRESS, AND OFFICE (if applicable)

PERCENTAGE OF STOCK

- c. If the owner is a TRUSTEE, and list the trustee's name, the name and address of the beneficiaries of the trust and the percentage of interest held by each. [Note: where the beneficiary/beneficiaries consist of

corporation(s), another trust(s), partnership(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

TRUSTEE'S NAME: _____

BENEFICIARY'S NAME AND ADDRESS

PERCENTAGE OF INTEREST

-
- d. If the owner is a PARTNERSHIP or LIMITED PARTNERSHIP, list the name of the partnership, the name and address of the principals of the partnership, including general and limited partners, and the percentage of interest held by each. [Note: where the partner(s) consist of another partnership(s), corporation(s) trust(s) or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

PARTNERSHIP NAME: _____

NAME AND ADDRESS OF PARTNERS

PERCENTAGE OF OWNERSHIP

-
- e. If the owner is party to a CONTRACT FOR PURCHASE, whether contingent on this application or not, and whether a Corporation, Trustee, or Partnership, list the names of the contract purchasers below, including the principal officers, stockholders, beneficiaries, or partners. [Note: where the principal officers, stockholders, beneficiaries, or partners consist of another corporation, trust, partnership, or other similar entities, further disclosure shall be required which discloses the identity of the individual(s) (natural persons) having the ultimate ownership interest in the aforementioned entity].

NAME, ADDRESS AND OFFICE (if applicable)

PERCENTAGE OF INTEREST

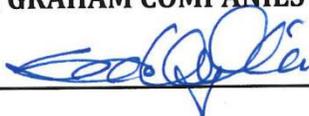
Date of Contract _____

If any contingency clause or contract terms involve additional parties, list all individuals or officers, if a corporation, partnership, or trust

For any changes of ownership or changes in contracts for purchase subsequent to the date of the application, but prior to the date of the final public hearing, a supplemental disclosure of interest shall be filed.

The above is a full disclosure of all parties of interest in this application to the best of my knowledge and behalf.

THE GRAHAM COMPANIES

BY: 

PRINT NAME: STU WOLFE

TITLE: PRESIDENT THE GRAHAM COMPANIES

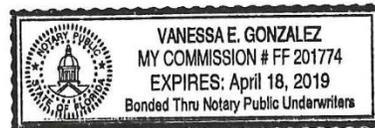
Sworn to and subscribed before me

this 23rd day of November, 2015

My Commission Expires:



Notary Public, State of Florida at Large (SEAL)



Disclosure shall not be required of any entity, the equity interest in which are regularly traded on an established securities market in the United States or other country; or pension funds or pension trusts of more than five thousand (5,000) ownership interests; any entity where ownership interests are held in a partnership, corporation or trust consisting of more than five thousand (5,000) separate interests including all interests at each level of ownership, and no one pension or entity holds more than a total of five (5) percent of the ownership interest in the partnership, corporation or trust; or of any entity, the ownership interest of which are held in a partnership, corporation or trust consisting of more than 5,000 separate interests and where no one person or entity holds more than a total of 5% of the ownership interest in the partnership, corporation or trust. Entities whose ownership interests are held in partnership, corporation, or trust consisting of more than five thousand (5,000) separate interests, including all interests at every level of ownership, shall only be required to disclose those ownership interest which exceed five (5) percent of the ownership interest in the partnership, corporation or trust.

EXHIBIT B-1

PROPERTY DESCRIPTION: Provide the following information for all properties in the application area in which the applicant has an interest. Complete information must be provided for each parcel.

APPLICANT	OWNER OF RECORD	FOLIO NUMBER	SIZE IN ACRES
x	THE GRAHAM COMPANIES	30-2008-001-0680	3.519
x	THE GRAHAM COMPANIES	30-2008-001-0490	32.917
x	THE GRAHAM COMPANIES	30-2008-001-0700	9.55
x	THE GRAHAM COMPANIES	30-2008-001-0710	9.55
x	THE GRAHAM COMPANIES	30-2008-001-0720	9.55
x	THE GRAHAM COMPANIES	30-2008-001-0560	4.09
x	THE GRAHAM COMPANIES	30-2008-001-0550	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0540	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0530	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0520	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0510	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0850	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0860	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0870	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0880	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0890	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0900	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0910	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0920	4.09
x	THE GRAHAM COMPANIES	30-2008-001-0930	9.55
x	THE GRAHAM COMPANIES	30-2008-001-0840	10.0
x	THE GRAHAM COMPANIES	30-2008-001-0830	10.0
x	THE GRAHAM COMPANIES	30-2008-001-0940	9.55
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0820	10.0
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0950	9.55
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0960	9.55
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0810	10.0
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0730	5.0
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0740	5.0
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0750	5.0
x	THE GRAHAM COMPANIES	30-2008-001-0760	5.0

	& CYNTHIA G. GORDON		
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0770	5.0
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0780	5.0
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0790	5.0
x	THE GRAHAM COMPANIES & CYNTHIA G. GORDON	30-2008-001-0800	4.093
	GENESIS PARTNERS DEVELOPMENT ENTERPRISES, LLC	30-2009-001-0420	10.0
	GENESIS PARTNERS DEVELOPMENT ENTERPRISES, LLC	30-2009-001-043 2	2.5
	GENESIS PARTNERS DEVELOPMENT ENTERPRISES, LLC	30-2009-001-0433	1.25
	GENESIS PARTNERS DEVELOPMENT ENTERPRISES, LLC	30-2009-001-0435	1.25
x	THE GRAHAM COMPANIES	30-2009-001-0470	4.16
x	THE GRAHAM COMPANIES	30-2009-001-0480	8.7
	INTERNATIONAL ATLANTIC, LLC	PORTION OF 30-2009-001-0170	16.216
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0240	6.216
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0241	2.5
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0242	1.25
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0250	1.25
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0252	1.25
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0251	1.25
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0253	1.25
x	THE GRAHAM COMPANIES	PORTION OF 30-2009-001-0254	1.25
x	THE GRAHAM COMPANIES	30-2008-001-0080	5.0
	TGC SECTION 8 9 NORTH POINT LLC	PORTION OF 30-2008-001-0240	2.22
	TGC SECTION 8 9 NORTH POINT LLC	PORTION OF 30-2008-001-0230	2.22
	TGC SECTION 8 9 NORTH POINT LLC	PORTION OF 30-2008-001-0300	9.43

EXHIBIT B-2

DISCLOSURE OF INTEREST FOR THE GRAHAM COMPANIES

**THE GRAHAM COMPANIES STOCKHOLDERS
RECORD DATE NOVEMBER 18, 2015**

	A		B		TOTAL	
	SHARES	%	SHARES	%	SHARES	%
WILLIAM A GRAHAM FAMILY						
CGW & EGM, Co-Tees of the PCG Rev Trust u/d/t dtd 3/25/94	-	-	89,108.3944	9.79	89,108.3944	8.5017
CGW & EGM, Co-Tees, fbo Marital Trust, dtd 3/25/94	26,026.1000	18.92	34,922.2000	3.84	60,948.3000	5.8150
CDY, tee, SG Younts Family Trust, fbo CD Younts, dtd 3/3/2010	-	-	2,047.8000	0.22	2,047.8000	0.1954
SS WYLLIE, Tee, WEG Rev Tr dated 3/25/99	-	-	-	-	-	-
CAROL G. WYLLIE	24.7600	0.02	179.5400	0.02	204.3000	0.0195
CAROL G. WYLLIE 2012 Family Trust Agreement	9,000.0000	6.54	38,810.8200	4.26	47,810.8200	4.5616
GRAHAM-WYLLIE Family Trust Agreement	-	-	9,190.7700	1.01	9,190.7700	0.8769
CYNTHIA G. GORDON	6,815.0000	4.95	24,723.1027	2.72	31,538.1027	3.0090
CGW tee, Gordon Family Irrev Trust fbo KP GORDON, dtd 12/19/12	-	-	4,595.3800	0.50	4,595.3800	0.4384
CGW, tee, Gordon Family Irrev Trust fbo LW GORDON, dtd 12/19/12	-	-	4,595.3800	0.50	4,595.3800	0.4384
ELIZABETH G MARTINEZ	-	-	70.7954	0.01	70.7954	0.0068
ELIZABETH G. MARTINEZ 2012 Family Trust Agreement	6,485.9700	4.71	44,876.9200	4.93	51,362.8900	4.9005
GRAHAM-MARTINEZ Family Trust Agreement	-	-	12,232.9500	1.34	12,232.9500	1.1671
LUIS O. MARTINEZ	-	-	81.8713	0.01	81.8713	0.0078
LUIS O. MARTINEZ Family Trust	4,341.0000	3.15	8,567.8079	0.94	12,908.8079	1.2316
MICHAEL A. MARTINEZ	-	-	1,643.3800	0.18	1,643.3800	0.1568
DANIEL L. MARTINEZ	-	-	5,199.1400	0.57	5,199.1400	0.4960
KATHRYN N. MARTINEZ	-	-	1,643.3800	0.18	1,643.3800	0.1568
ALISON J. MARTINEZ	-	-	4,971.4200	0.55	4,971.4200	0.4743
STUART S. WYLLIE	-	-	139.9363	0.02	139.9363	0.0134
STUART WYLLIE 2012 Family Trust Agreement	5,295.7600	3.85	11,778.0000	1.29	17,073.7600	1.6290
BENJAMIN C. GORDON	4,341.0000	3.15	4,802.6792	0.53	9,143.6792	0.8724
KATHLEEN P. GORDON	-	-	1,643.3800	0.18	1,643.3800	0.1568
LEE W. GORDON	-	-	1,643.3800	0.18	1,643.3800	0.1568
TRACY F. GRAHAM	-	-	1,773.0000	0.19	1,773.0000	0.1692
ANDREA L. GRAHAM	1,630.4300	1.18	13,476.3800	1.48	15,106.8100	1.4413
AG RECHICHI, tee of Trust fbo AG RECHICHI ctd u/A VIII of WEG Tst	3,407.5000	2.48	15,962.8845	1.75	19,370.3845	1.8481
RECHICHI CHILDREN'S TRUST, fbo William M. Rechichi	-	-	187.1345	0.02	187.1345	0.0179
KRISTOPHER E. GRAHAM	-	-	11,206.0000	1.23	11,206.0000	1.0691
KE GRAHAM, tee of Trust fbo KE GRAHAM ctd u/A VIII of WEG Tst '99	3,407.5000	2.48	14,600.8845	1.60	18,008.3845	1.7182
EGM, Tee, L. E. WYLLIE TR u/a/d 8/4/93	815.2200	0.59	10,542.4972	1.16	11,357.7172	1.0836
LAURA E. WYLLIE	-	-	4,986.7600	0.55	4,986.7600	0.4758
EGM, Tee, P. S. WYLLIE TR u/a/d 8/4/93	815.2200	0.59	10,723.2872	1.18	11,538.5072	1.1009
PHILIP S. WYLLIE	-	-	4,805.9700	0.53	4,805.9700	0.4585
CGW, Tee, D. L. MARTINEZ TR u/a/d 12/30/93	1,873.1600	1.36	6,296.1583	0.69	8,169.3183	0.7794
CGW, Tee, A. J. MARTINEZ TR u/a/d 12/30/93	1,873.1600	1.36	6,523.8782	0.72	8,397.0382	0.8011
CGW, Tee, M. A. MARTINEZ TR u/a/d 12/30/93	888.8350	0.50	12,230.1346	1.34	12,918.9696	1.2326
CGW, Tee, K. N. MARTINEZ TR u/a/d 12/30/93	888.8350	0.50	12,230.1346	1.34	12,918.9696	1.2326
CGG, As Custodian for K. GORDON u/Co Unif Tfirs	1,902.1700	1.38	5,414.1346	0.59	7,316.3046	0.6980
CGG, Tee, L. W. GORDON TR u/a/d 10/16/92	543.4800	0.39	9,260.1346	1.02	9,803.6146	0.9353
JOAN G. GRAHAM	220.0000	0.16	1,565.0000	0.17	1,785.0000	0.1703
	80,195.1000	58.28	449,262.8000	49.34	529,447.9000	50.5138
D. ROBERT GRAHAM FAMILY						
D. ROBERT GRAHAM REVOC LIV TR 9/1/2000	28,718.5000	20.87	14,319.5434	1.57	43,038.0434	4.1062
ADELE K. GRAHAM REVOC LIV TR 9/1/2000	-	-	9,400.0000	1.03	9,400.0000	0.8968
GWENDOLYN GRAHAM	950.0000	0.69	46,058.7690	5.06	47,008.7690	4.4850
GWENDOLYN GRAHAM, Tee, MARK E. LOGAN TR	-	-	955.5599	0.10	955.5599	0.0912
GWENDOLYN GRAHAM, Tee, SARAH G. LOGAN TR	-	-	955.5602	0.10	955.5602	0.0912
GWENDOLYN GRAHAM, Tee, TIMOTHY G. LOGAN TR	-	-	955.5599	0.10	955.5599	0.0912
GLYNN G. McCULLOUGH	799.0000	0.58	35,561.0965	3.91	36,360.0965	3.4691
WILLIAM B. McCULLOUGH	-	-	2,723.3580	0.30	2,723.3580	0.2598
McCULLOUGH Family Trust fbo MELISSA G. McCULLOUGH	-	-	614.6951	0.07	614.6951	0.0586
McCULLOUGH Family Trust fbo WILLIAM G. McCULLOUGH	-	-	614.6951	0.07	614.6951	0.0586
McCULLOUGH Family Trust fbo CAROLINE A. McCULLOUGH	-	-	614.6947	0.07	614.6947	0.0586
ARVA G. GIBSON	950.0000	0.69	38,846.6000	4.27	39,796.6000	3.7969
THOMAS C. GIBSON	-	-	832.0000	0.09	832.0000	0.0794
THOMAS C. GIBSON, Tee, Gift Trust KENDALL C. GIBSON	-	-	1,727.6698	0.19	1,727.6698	0.1648
THOMAS C. GIBSON, Tee, Gift Trust ANSLEY S. GIBSON	-	-	1,727.6698	0.19	1,727.6698	0.1648
THOMAS C. GIBSON, Tee, Gift Trust ADELE E. GIBSON	-	-	1,727.6698	0.19	1,727.6698	0.1648
KENDALL G. ELIAS	950.0000	0.69	46,842.6010	5.14	47,792.6010	4.5598
L. ROBERT ELIAS III	-	-	6,013.7604	0.66	6,013.7604	0.5738
L. ROBERT ELIAS III, tee, Peyton Elias Trust und Elias Children's Trust	-	-	1,040.2488	0.11	1,040.2488	0.0992
L. ROBERT ELIAS III, tee, Lewis R Elias Trust und Elias Children's Trust	-	-	1,040.2488	0.11	1,040.2488	0.0992
	32,367.5000	23.52	212,572.0000	23.35	244,939.5000	23.3693
PHILIP L. GRAHAM FAMILY						
DONALD E. GRAHAM	7,222.3000	5.25	75,458.3000	8.29	82,680.6000	7.8884
WILLIAM W. GRAHAM, Tee, WWG 1969 Revoc Trust	8,472.2000	6.16	86,708.3000	9.52	95,180.5000	9.0810
STEPHEN M. GRAHAM	2,222.2000	1.62	30,458.4000	3.35	32,680.6000	3.1180
	17,916.7000	13.02	192,625.0000	21.16	210,541.7000	20.0874
MARY GRAHAM CROW FAMILY						
PHILIP G. CROW	-	-	3,251.7000	0.36	3,251.7000	0.3102
MARY YORK BEHNCKE	-	-	2,790.0000	0.31	2,790.0000	0.2662
	-	-	6,041.7000	0.66	6,041.7000	0.5764
FREDERICK S. BEEBE FAMILY						
WALTER H. BEEBE	751.0000	0.55	13,999.0000	1.54	14,750.0000	1.4073
MICHAEL BEEBE	596.0000	0.43	6,170.0000	0.68	6,766.0000	0.6455
	1,347.0000	0.98	20,169.0000	2.22	21,516.0000	2.0528
GERALD E. TOMS FAMILY						
THOMAS N. TOMS II	1,456.0000	1.06	9,949.8000	1.09	11,405.8000	1.0882
LOUIS B. TOMS	1,419.7000	1.03	9,733.3000	1.07	11,153.0000	1.0641
ELIZABETH T BRINEGAR	1,413.0000	1.03	4,878.3000	0.54	6,291.3000	0.6002
MARGARET TOMS	1,479.0000	1.07	5,309.7000	0.58	6,788.7000	0.6477
	5,767.7000	4.19	29,871.1000	3.28	35,638.8000	3.4002
TOTAL SHARES OUTSTANDING	137,594.0000	100.00	910,531.6000	100.00	1,048,125.6000	100.0000
TREASURY STOCK	91,877.1000	-	1,154,697.3000	-	1,246,574.4000	-
TOTAL SHARES AUTHORIZED	229,471.1000	-	2,065,228.9000	-	2,294,700.0000	-

EXHIBIT "C"

LOCATION MAP FOR APPLICATION TO AMEND THE COMPREHENSIVE DEVELOPMENT MASTER PLAN

APPLICANT/REPRESENTATIVE

The Graham Companies / Joseph G. Goldstein, Esq. and Tracy R. Slavens

DESCRIPTION OF SUBJECT AREA

The subject property consists of approximately 339± gross acres of land located in Sections 8 and 9, Township 52, Range 40, of unincorporated Miami-Dade County, Florida (the "Property" and also hereinafter referred to as the "Graham Application Area"). More specifically, the Property is located east of the Homestead Extension of Florida's Turnpike ("HEFT") and west of Interstate 75 ("I-75") between NW 170 Street and NW 180 Street.

LOCATION MAP



Acreage owned by Applicants: +/-309

Acreage owned by Others: +/-31

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Question 5 – Legal Description

Attach a legal description of the development site. Include section, township and range.

LEGAL DESCRIPTION OF GRAHAM PROPERTY AFTER TRADE

A portion of Tracts 8, and 20 through 24, inclusive, of the Northeast 1/4 of Section 8, Township 52 South, Range 40 East; together with all of Tracts 1 through 24, inclusive, of the Southeast 1/4 of said Section 8, Township 52 South, Range 40 East; also together with a portion of Tracts 1, 2, 9 through 12, inclusive, Tracts 17 through 21, inclusive, and all of Tracts 3 through 8, inclusive, Tracts 22 through 24, inclusive, of the Southwest 1/4 of said Section 8, Township 52 South, Range 40 East; also together with a portion of Tract 8, of the Northwest 1/4 of said Section 8, Township 52 South, Range 40 East; also together with that portion of the 10 foot wide right-of-way lying within the limits of the herein described parcel; also together with that portion of the 60 foot wide canal right-of-way as recorded in Official Records Book 5139 at Page 103, lying within the limits of the herein described parcel; all according to the plat of “Chambers Land Company Subdivision”, as recorded in Plat Book 2, at Page 68; also together with a portion of Tracts 24 and 25 of the Northwest 1/4 of said Section 9, Township 52 South, Range 40 East; also together with a portion of Tracts 33, 41 through 43, inclusive, 47, and all of Tracts 44 and 48, of the Southwest 1/4 of said Section 9, Township 52 South, Range 40 East; subject to that portion of the 15 foot wide road reservation lying within the limits of the herein described parcel; according to the plat of “Florida Fruit Lands Company’s Subdivision No. 1”, as recorded in Plat Book 2 at Page 17, all of the Public Records of Miami-Dade County, Florida, being more particularly described as follows:

Commence at the Southeast corner of the Southwest 1/4 of said Section 9; thence South 89 degrees 28 minutes 37 seconds West, along the South line of the said Southwest 1/4 of said Section 9, for 1980.94 feet to the Point of Beginning of the following described parcel; thence continue South 89 degrees 28 minutes 37 seconds West, along the last described course, for 660.31 feet to the Southwest corner of said Section 9; said corner also being the Southeast corner of said Section 8; thence South 89 degrees 41 minutes 50 seconds West, along the South line of said Section 8, for 5284.61 feet to the Southwest corner of said Section 8; thence North 02 degrees 37 minutes 33 seconds West, along the West line of the said Southwest 1/4 of said Section 8, for 347.26 feet to a point on the next described circular curve; said point bears North 57 degrees 41 minutes 53 seconds West from the radius point of the following described circular curve; thence Northeasterly, along said circular curve to the right, having a radius of 4365.35 feet and a central angle of 15 degrees 09 minutes 34 seconds for an arc distance of 1154.99 feet to a Point of Tangency; thence North 47 degrees 27 minutes 37 seconds East for 2533.14 feet; said last described three courses being coincident with the Southeasterly limited access right-of-way line of State Road No. 821 (Homestead Extension of the Florida Turnpike), as shown on the State of Florida Department of Transportation Right-of-Way Map Section 87005 Contract 2313 approved September, 1970, last revised November 1, 1971 (Sheets 1 through 5); thence North 89 degrees 37 minutes 45 seconds East for 4743.49 feet; thence South 02 degrees 36 minutes 44 seconds West, along the Westerly right-of-way line of Interstate 75 (State Road 93), as shown on the State of Florida Department of Transportation Right-of-Way Map Section 87075-2402, approved July 5, 1977, last revised December 1, 1978 (Sheets 1 through 10) for 622.09 feet; thence South 89 degrees 33 minutes 22 seconds West, along the South line of said

Tracts 33 and 48 of the said Southwest 1/4 of said Section 9 for 1620.91 feet; thence South 02 degrees 36 minutes 53 seconds East, along a line that is parallel with and 549.12 feet East of, as measured at right angles to, the West line of the said Southwest 1/4 of said Section 9, for 329.95 feet; thence South 89 degrees 32 minutes 42 seconds West, along the South line of said Tract 47 of the said Southwest 1/4 of said Section 9, for 549.51 feet; thence South 02 degrees 36 minutes 53 seconds East, along the West line of the said Southwest 1/4 of said Section 9, for 660.11 feet; thence North 89 degrees 31 minutes 20 seconds East, along the North line of said Tract 44 of the said Southwest 1/4 of said Section 9, for 1320.61 feet; thence South 02 degrees 37 minutes 01 seconds East, along the East line of said Tract 44 of the said Southwest 1/4 of said Section 9, for 329.79 feet; thence South 89 degrees 30 minutes 39 seconds West, along the South line of said Tract 44 of the said Southwest 1/4 of said Section 9, for 660.31 feet; thence South 02 degrees 36 minutes 57 seconds East, along the East line of the West 1/2 of said Tracts 43 through 41, inclusive and respectively, of the said Southwest 1/4 of said Section 9, for 989.77 feet to the Point of Beginning; all lying and being in Miami-Dade County, Florida.

LESS AND EXCEPTING THEREFROM: (Well Sites and Access Road)

All of that certain parcel entitled Well Sites and Access Road as described in Exhibit "A" of the Special Warranty Deed as recorded in Official Records Book 28776 at Page 2457 of the Public Records of Miami-Dade County, Florida, being further described as follows:

A strip of land for well sites and access road purposes. In that portion of Section 8, Township 52 South, Range 40 East, Miami-Dade County, Florida, lying 60 feet East of the West line of said Section 8 and Southeasterly of the Southeasterly Right of Way line of State Road No. 821, Homestead Extension of Florida's Turnpike, more particularly described as follows:

Commence at the Southwest corner of Section 8, Township 52 South, Range 40 East; thence North 89 degrees 41 minutes 47 seconds East, along the South line of said Section 8 for a distance of 60.05 feet; thence North 02 degrees 37 minutes 46 seconds West, for a distance of 60.06 feet to a point on the North line of 60 feet Canal right-of-way recorded in O.R.B. 5139, Page 103, also being the Point of Beginning; thence continue North 02 degrees 37 minutes 46 seconds West, along a line 60 feet East of and parallel with the West line of said Section 8, for a distance of 373.43 feet to intersect with a non tangent circular curve concave Southeasterly, also being the Southeasterly right-of-way line of State Road No. 821, Homestead Extension of Florida's Turnpike, at which point the radial bears South 56 degrees 19 minutes 50 seconds East; thence along said circular curve, having for its elements a radius of 4365.66 feet, a central angle of 13 degrees 47 minutes 07 seconds and an arc distance of 1050.37 feet to a Point of Tangency; thence North 47 degrees 27 minutes 17 seconds East, along said Southeasterly right-of-way line of the State Road No. 821 for a distance of 2481.17 feet; thence South 42 degrees 32 minutes 43 seconds East for a distance of 25.00 feet; thence South 47 degrees 27 minutes 17 seconds West, along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, for a distance of 147.00 feet; thence south 42 degrees 32 minutes 43 seconds East for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, for a distance of 50.00 feet; thence North 42 degrees 32 minutes 43 seconds West, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, for a distance of 969.56 feet; thence South 42 degrees 32 minutes

43 seconds East, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, for a distance of 50.00 feet; thence North 42 degrees 32 minutes 43 seconds West for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, for a distance of 969.56 feet; thence South 42 degrees 32 minutes 43 seconds East, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, for a distance of 50.00 feet; thence North 42 degrees 32 minutes 43 seconds West, for a distance of 50.00 feet; thence South 47 degrees 27 minutes 17 seconds West, along a line 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, for a distance of 245.05 feet to a Point of Curvature of a circular curve concave Southeasterly; thence along said circular curve 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, having for its elements a radius of 4340.66 feet, a central angle of 9 degrees 28 minutes 51 seconds and an arc distance of 718.25 feet; thence South 51 degrees 53 minutes 44 seconds East, for a distance of 50.00 feet; thence South 37 degrees 38 minutes 14 seconds West for a distance of 50.00 feet; thence North 51 degrees 53 minutes 44 seconds West, for a distance of 50.00 feet to a point of a non tangent circular curve concave Southeasterly and 25 feet Southeasterly of and parallel with the aforesaid Southeasterly right-of-way line of the State Road No. 821, Homestead Extension of Florida's Turnpike, at which point the radial bears South 52 degrees 41 minutes 10 seconds East; thence along said circular curve, having for its elements a radius of 4340.66 feet, a central angle of 2 degrees 27 minutes 36 seconds and an arc distance of 186.37 feet; thence South 23 degrees 22 minutes 18 seconds West, for a distance of 25.48 feet to a point of a non tangent circular curve concave Southeasterly and 30 feet Southeasterly of and parallel with aforesaid Southeasterly right-of-way line of the State Road No. 821, Homestead Extension of Florida's Turnpike, at which point the radial bears South 55 degrees 28 minutes 34 seconds East; thence along said circular curve, having for its elements a radius of 4335.66 feet, a central angle of 0 degrees 43 minutes 29 seconds and an arc distance of 54.84 feet; thence South 02 degrees 37 minutes 46 seconds East along a line 90 feet East of and parallel with the West line of Section 8, for a distance of 339.77 feet; thence North 89 degrees 41 minutes 48 seconds East, for a distance of 15.01 feet; thence South 02 degrees 37 minutes 46 seconds East, for a distance of 25.02 feet; thence South 89 degrees 41 minutes 48 seconds West, along the North line of 60 feet Canal right-of-way recorded in O.R.B. 5139, Page 103, for a distance of 45.04 feet to the Point of Beginning.

Containing 109,900 Square Feet or 2.52 Acres, more or less, by calculations.

NOTE: The "Less and Excepting Therefrom" portion of this Legal Description is a restatement of the Legal Description entitled "Well Sites and Access Road" contained in the herein referenced Official Records Book 28776 at Page 2457.

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Question 8 – Permit Information

List all agencies (local, state and federal) from which approval and/or a permit must be obtained prior to initiation of development. Indicate the permit or approval for each agency and its status. Indicate whether the development is registered or whether registration will be required with the Division of Florida Land Sales, Condominiums and Mobile Homes under Chapter 478, Florida Statutes. Indicate whether the development will be registered with the H.U.D., Division of Interstate Land Sales Registration or with other states.

The project will obtain any and all necessary permits. Currently, the Applicant anticipates obtaining the following permits, which will be obtained prior to the initiation of the development, as required.

Agency	Permit/Approval	Status
Miami-Dade County	CDMP Amendment	Pending
	Re-zoning	Future Action
	Site Plan Approval	Future Action
	Plat Approval	Future Action
	Building Permit(s)	Future Action
	Wastewater Collection System Permit	Future Action
	Roadway Improvement Plans	Future Action
	Tree Removal Permit	If Required
	Water Distribution System Permit	Future Action
	Complex Source Permit	If Required
	Wetland Jurisdictional Determination	Future Action
	Class IV (Freshwater Wetland Dredge & Fill)	Future Action
	Surface Water Management Permit	Future Action (if not issued by SFWMD)
State of Florida		
South Florida Regional Planning Council	CDMP Amendment	Future Action

Agency	Permit/Approval	Status
South Florida Water Management District	Wetland Jurisdictional Determination	In Process
	Environmental Resource Permit (Stormwater and Water Quality Certification)	Future Action (if not issued by DERM)
	Water Use Permit	If Required
Department of Economic Opportunity	CDMP Amendment Review	In Process
Department of Environmental Protection	Wastewater Collection System Permit	Future Action
	Water Distribution System Permit	Future Action
	Air Quality	Future Action
Department of Transportation	Roadway Improvement Plans	Future Action
Federal		
U.S. Army Corps of Engineers	Wetland Jurisdictional Determination	Future Action
	Dredge and Fill Permit	Future Action

At this time, registration of the development as currently proposed with the Division of Florida Land Sales, Condominiums, and Mobile Homes under Chapter 498, Florida Statutes, will not be required. The development will not be registered with H.U.D. Division of Interstate Land Sales registration or with other state agencies.

Question 9 – Maps

The following maps must be provided as a part of the ADA. The appropriate scale for each map should be determined at the pre-application conference.

Map A. A general location map. Indicate the location of any urban service area boundaries and regional activity centers in relation to the project site.

Please see attached **Exhibit A, General Location Map.**

Map B. A recent vertical aerial photo of the site showing project boundaries which reasonably reflects current conditions. Specify the date the photo was taken.

Please see attached **Exhibit B, Aerial Map.**

Map D. A land use map showing existing and approved uses on and abutting the site. The uses shown should include existing on-site land uses, recreational areas, utility and drainage easements, wells, right-of-way, and historic, archaeological, scientific and architecturally significant resources and lands held for conservation purposes.

Please see attached **Exhibit D, Existing Land Use Map.**

Map E. A soils map of the site, with an identification of the source of the information. The use of a source other than the most recently published U.S.D.A. Soil Conservation Service (SCS) soil surveys should be determined in consultation with the appropriate regional planning council and other reviewing agencies at the preapplication conference.

Please see attached **Exhibit E, Soils Map.**

Map F. A vegetation associations map indicating the total acreage of each association, based on the Level III vegetation types described in The Florida Land Use and Cover Classification System: A Technical Report, available from each regional planning council.

Please see attached **Exhibit F, Vegetation/FLUCCS Map.**

Map H. A master development plan for the site. Indicate proposed land uses and locations, development phasing, major public facilities, utilities, preservation areas, easements, right-of-way, roads, and other significant elements such as transit stops, pedestrian ways,

etc. This plan will provide the basis for discussion in Question 10-A as well as other questions in the ADA.

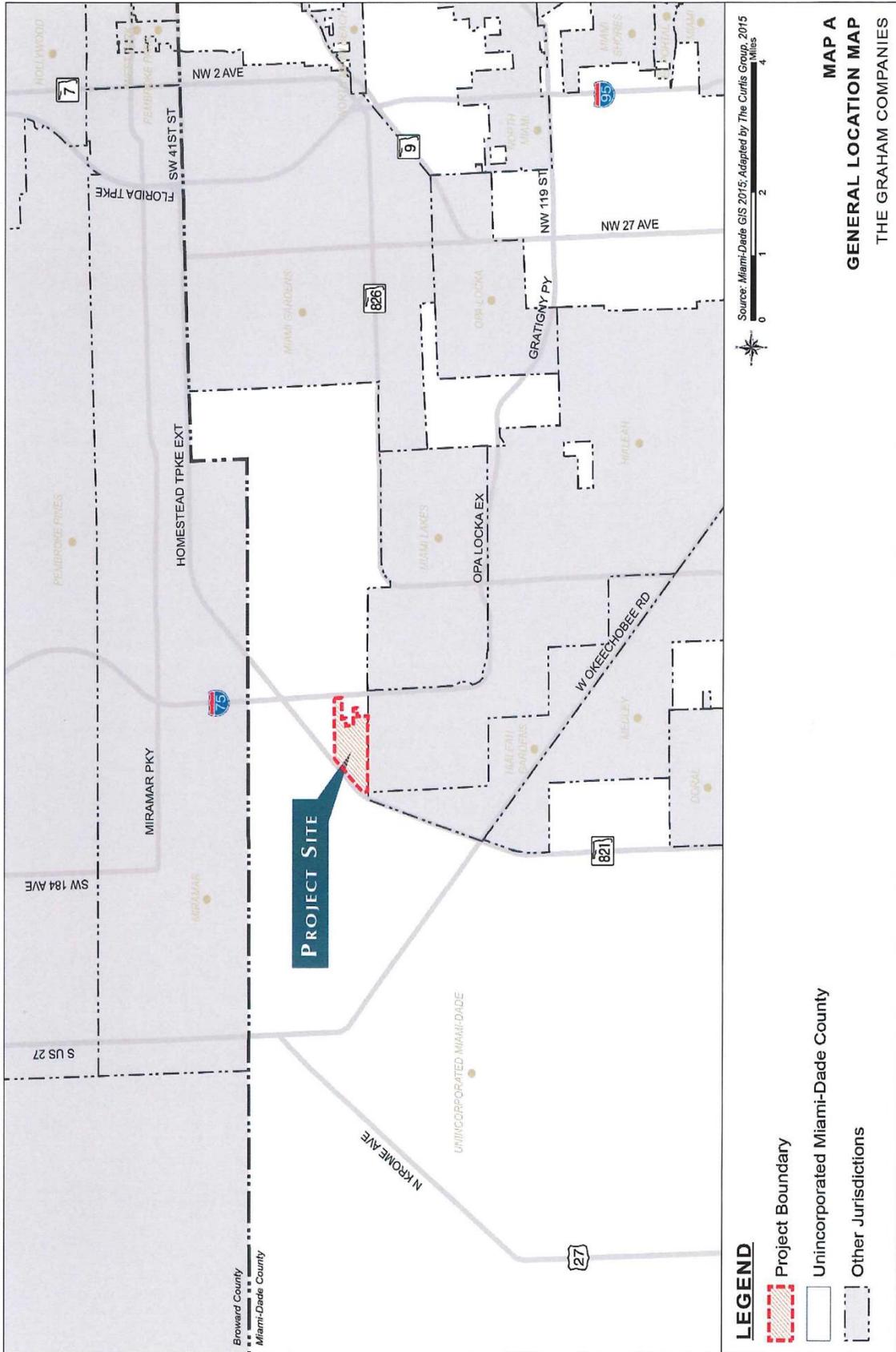
Please see attached **Exhibit H, Master Development Plan.**

Map I. A master drainage plan for the site. Delineate existing and proposed: drainage basins, flow direction, water retention areas, drainage structures, flow route offsite, drainage easements, waterways, and other major drainage features. (This information may be presented on two separate maps (existing and proposed), if desired.)

Please see attached **Exhibit I, Drainage Master Plan.**

Map J. A map of the existing highway and transportation network within the study area. The study area includes the site, and locations of all transportation facilities which are substantially impacted. This area should be finally defined on the basis of the findings of the traffic impact analysis, including determinations of where the criteria for a substantial impact are met. Map J will become the base for the maps requested in Question 21.

Please see attached **Exhibit J** included under Question 21.





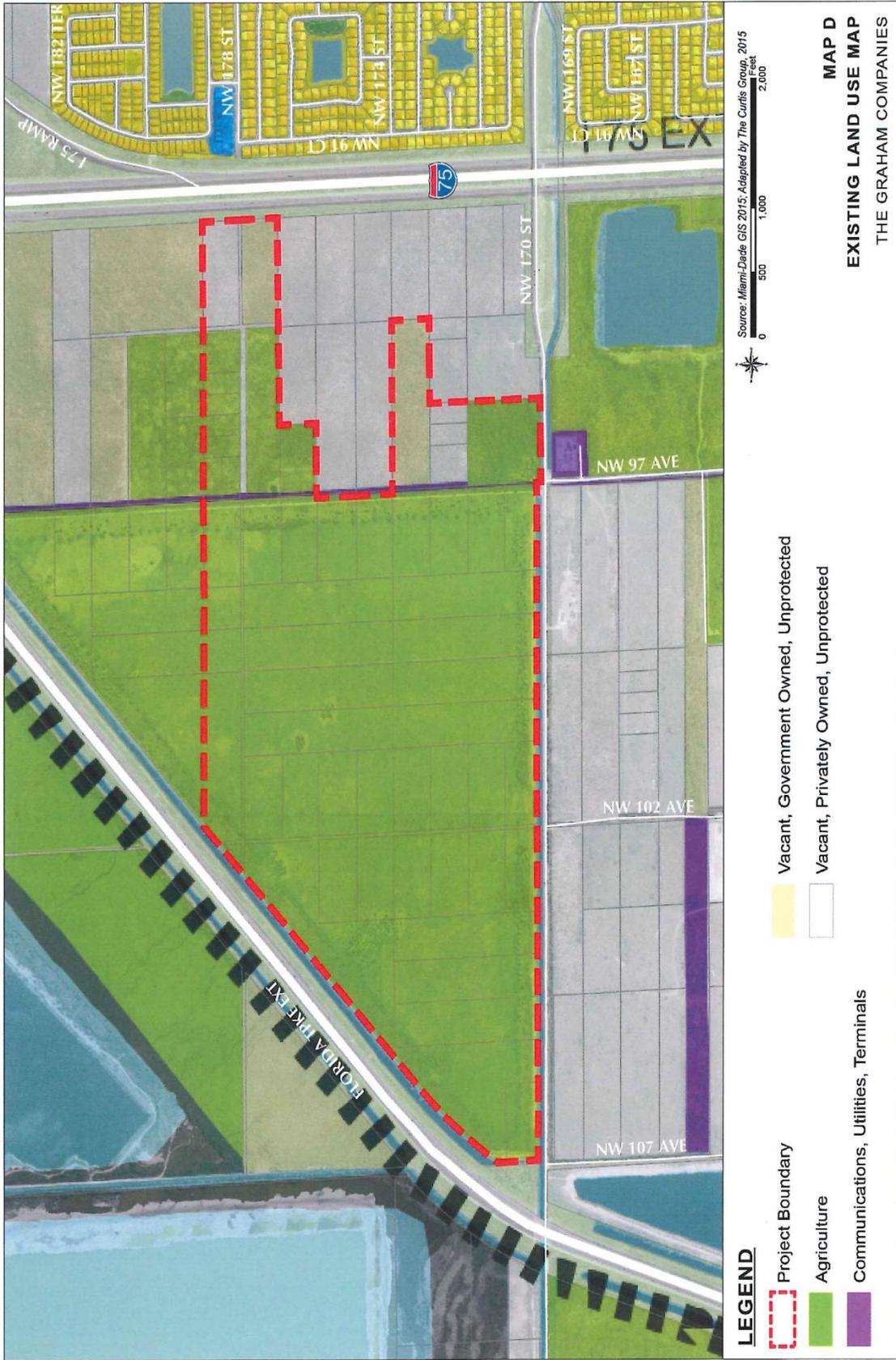
LEGEND

 Project Boundary

Source: Miami-Dade GIS 2015; Adapted by The Curtis Group, 2015

0 500 1,000 2,000 Feet

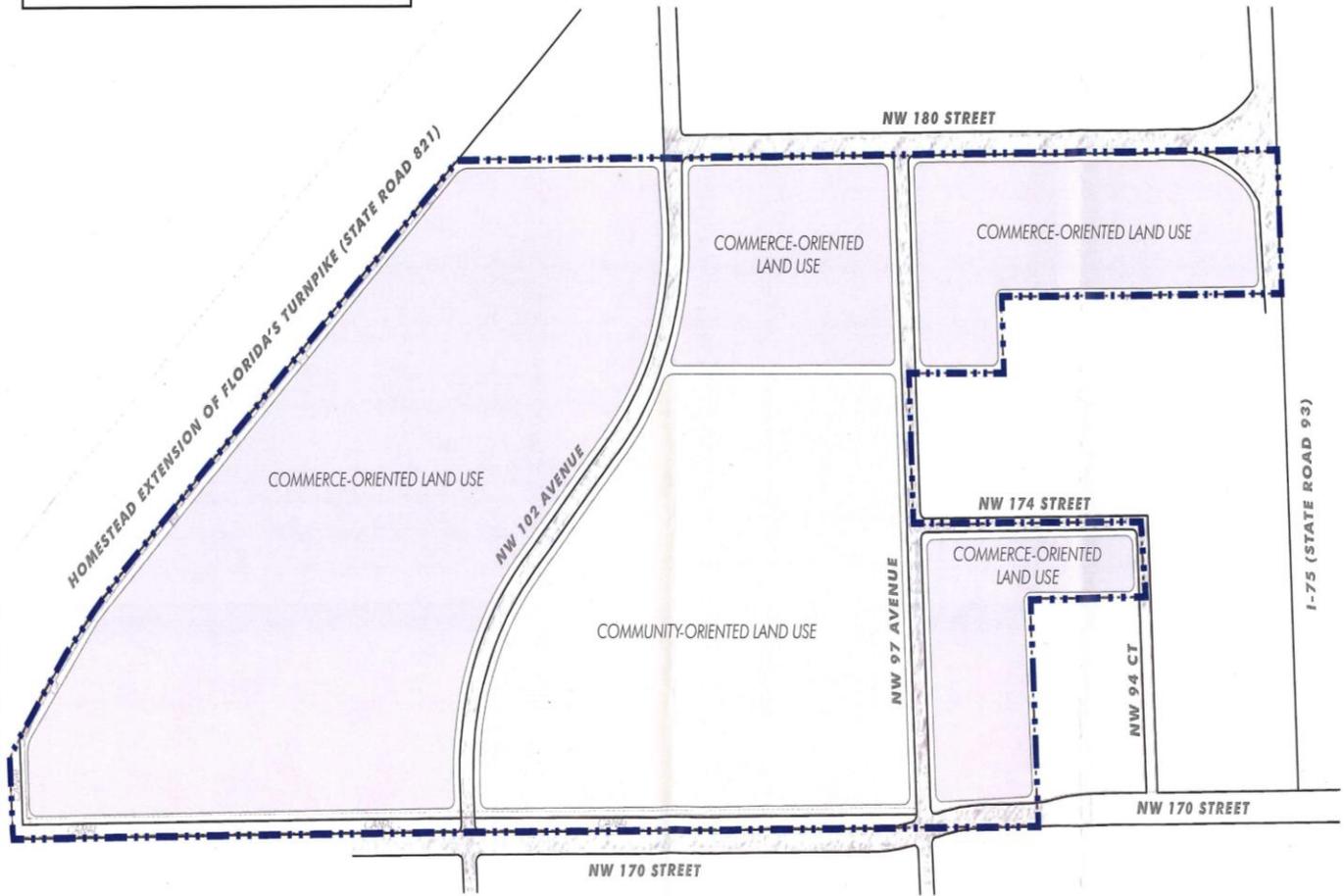
**MAP B
AERIAL MAP
THE GRAHAM COMPANIES**



COMPREHENSIVE PLAN LAND USES

BUSINESS AND OFFICE

- EMPLOYMENT CENTER
- COMMERCE-ORIENTED LAND USE
- COMMUNITY-ORIENTED LAND USE



Source: Schwelke-Shiskin & Associates 2015, Curtis+Rogers Design Studio 2015

LEGEND

 Project Boundary

Note: This plan is conceptual. Final site organization will occur at the time of zoning in a manner substantially consistent with the Employment Center designation and this conceptual plan.

MAP H
CONCEPTUAL MASTER DEVELOPMENT PLAN

THE GRAHAM COMPANIES

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Question 10 – General Project Description

PART 1 SPECIFIC PROJECT DESCRIPTION

- A. Describe and discuss in general terms all major elements of the proposed development in its completed form. Include in this discussion the proposed phases (or stages) of development (not to exceed five years), magnitude in the appropriate units from Chapter 28-24, F.A.C., where applicable, and expected beginning and completion dates for construction.**

The Graham Companies Application Area (the “Application Area”) will be designed as a 339 gross acre, vertically and horizontally integrated well-planned mixed-use employment center that will be responsive to and supportive of the industrial and office uses to the south, community to the east, and entertainment retail uses proposed to the north.

The Application Area will have access via a number of major roadways including NW 97 Avenue, NW 102 Avenue and anticipated connections to I-75 and HEFT. The uses will be developed in such a manner as to safeguard compatibility with adjacent uses. The Applicant will comply, to the extent feasible, with the design guidelines set forth in the CDMP Land Use Element and, particularly, the goals of the Employment Center overlay. The business park, commercial and residential uses will be designed in such a way so as to promote multimodal an mobility in order to create an environment that is accommodating to consumers, residents and employees.

The Application Area will be designed to create a quality of life for its visitors, tenants, residents and the residents from the surrounding area. Similar to Miami Lakes, it will create an opportunity for residents to work, shop, and play in the same area where they live without adversely impacting environmental resources and without causing an undue burden on county facilities and services.

- B. Provide a breakdown of the existing and proposed land uses on the site for each phase of development through completion of the project. The developed land uses should be those identified in Section 380.0651, F.S. and Chapter 28-24, F.A.C. Use Level III of The Florida Land Use and Cover Classification System: A Technical Report (September 1985), available from each regional planning council. Refer to Maps D (Existing Land Use) and H (Master Plan). Use the format below and treat each land use category as mutually exclusive unless otherwise agreed to at the pre-application conference.**

The Applicant intends to develop the Application Area with 2,000 multi-family rental dwelling units, 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use.

Table 10-1A, Existing and Proposed Land Uses, presents a breakdown for both the existing and proposed land uses on the Project site. The proposed land use acreages are estimates and will be confirmed as the project proceeds to final design.

**Table 10-1A
Existing And Estimated Proposed Land Uses**

Land Use	Non-Residential		Residential				Total Acreage
	Units	Acres	DU	Acres	Net Density	Gross Density	
Existing Vegetation Associations							
Dog Fennel and Low Marsh Grasses (6415, FLUCCS)		230					
Brazilian Pepper (422, FLUCCS)		82					
Melaleuca (424, FLUCCS)		27					
Total Acreage		339					
Proposed Project (2016 - 2040)							
Total Residential			2,000	339	N/A	5.9 du/acre	
Retail	1,000,000 gsf	See Note					
Office / Industrial / Business Park	3,000,000 gsf	See Note					
Estimated Parks		15					
Estimated ROW dedications		50					
Estimated Water Retention		75					
Total Acreage							339

Note: Each use is part of a vertically and horizontally integrated mixed-use employment center, so precise acreage of each use is subject to interpretation.

C. Briefly describe previous and existing activities on site. Identify any constraints or special planning considerations that these previous activities have with respect to the proposed development.

The Subject-Parcel has been heavily impacted by past and present agricultural activities, as shown on **Map B - Aerial Photograph**.

D. If the development is proposed to contain a shopping center, describe the primary and secondary trade areas which the proposed shopping center will serve.

The development program for the Employment Center being proposed for development by The Graham Companies includes 1.0 million square feet of retail space together with a 3.0 million square foot business park and 2,000 rental apartment units. It is anticipated that approximately 125,000 square feet of the proposed retail space will be contained in a neighborhood shopping center while the remaining 875,000 square feet will be more regional in orientation. It is further anticipated that approximately 25 percent of retail space developed will be occupied by food and beverage providers.

The Applicant believes that the primary market for the proposed neighborhood retail space will be comprised of the households that occupy the 2,000 rental apartments that will be developed as part of the Employment Center project as well as the households that occupy that residential development that is on-going on the east side of NW 97th Avenue between NW 138th Street and NW 170th Street. Additional market support is likely to come from the Employment Center's on-site workforce as well as those at American Dream Miami to the north and the Beacon Countyline industrial project to the south.

The primary motivation for the development of the proposed regional retail space will be its proximity to the 6.2 million square foot American Dream Miami entertainment retail project, which is proposed for development on property immediately north of the proposed Employment Center. The location of American Dream Miami project is in part predicated on accessibility to the regional highway via interstate 75 and the Homestead Extension of Florida's Turnpike (HEFT) which abut the sites of both the proposed entertainment retail project and the proposed Employment Center. The developer of American Dream Miami expects it to attract more than 30 million visitors annually. More than half of the visitors to American Dream Miami will be tourists to South Florida from both domestic and foreign points of origin while the remainder will be people living in Miami-Dade and Broward Counties. The Applicant believes that there are retailers, including wide variety of "big boxes", who will either be unable to locate in the American Dream Miami or disinterested in doing so that will seek to locate in the proposed Employment Center to be in a position to capitalize on the traffic created by American Dream Miami.

E. Describe, in general terms, how the demand for this project was determined.

A market study has not been prepared for the proposed Employment Center project as a whole or for individually for the business park, retail and residential uses that it will contain. However, it should be noted that demand for developing a business park with office and industrial uses on the proposed Employment Center's site was implicitly recognized during the April 2005 CDMP amendment cycle when the Urban Development Boundary was expanded to include 280 of the site's 339 total acres. Perhaps, more importantly, the developer of the project will be The Graham Companies, an entity founded in 1927 that has established itself as one the most respected developers in Miami-Dade with a reputation for making long-term commitments to its projects. The Graham Companies are best known as the master developer of the 3,000-acre Miami Lakes project. That project, which is considered by many to be the premiere planned community in Miami-Dade County, was begun in the 1960's and continues in development today with a mixture of residential, office, retail, industrial and hospitality uses as well as a wide variety of recreational and civic facilities. Based on their long-long time involvement in the development in Miami Lakes, The Graham Companies have a deep understanding of the market forces that will impact the development of the business park, retail and residential uses proposed for development as part of the proposed Employment Center. Its executives also believe that they have an excellent site on which to undertake the development of the proposed uses including:

- Accessibility to the regional highway network via Interstate 75 and the HEFT that will facilitate companies locating in the Employment Center to attract workers from throughout Miami-Dade and Broward Counties and to serve customers throughout the two County area.
- Frontage along the HEFT for companies seeking sites with high visibility.

- Adjacency to the site of the American Dream Miami entertainment retail project which is expected to attract more than 30 million visitors a year including visitors to South Florida from both domestic and foreign points of origin and residents of Miami-Dade and Broward Counties.
- Nearby accessibility to mass transit assuming that the proposed Palmetto Express Bus Route becomes operational between the intersection of Interstate 75 and NW 186 Street and the Palmetto Metrorail Station.
- Presence in an emerging area of residential development in Miami-Dade County in which housing demand will be stoked by the development of three projects --- the proposed Employment Center itself, American Dream Miami and the Beacon Countyline industrial project --- that will provide employment for more than 30,000 workers on a full-time equivalent (FTE) basis when they have been fully developed.

F. Economic Disparity

For the purpose of estimating the costs associated with the Employment Center being proposed for development by The Graham Companies, an illustrative development program was formulated. It should, however, be remembered that the market will dictate how the project ultimately gets developed over the course of the next 15 years and what is actually built may differ from the program shown below.

- Business Park
 - 1.53 million square feet of office space
 - 200,000 square feet of flex space
 - 300,000 square feet of distribution space
 - 2 limited service hotels with 300 rooms each
 - 2 full service hotels with 500 rooms each
- Retail/Food and Beverage
 - 125,000 neighborhood shopping center
 - 875,000 square feet of regional retail
- Residential
 - 2,000 rental apartments

The Applicant estimates that the development program shown above would cost approximately \$1.24 billion to implement in terms of hard costs (materials and labor). It is further estimated that an amount approximating \$310.0 million, or 25 percent of the estimated hard costs, would be spent on soft costs including such items as architectural and engineering fees, building permit and impact fees, project overhead, promotion, leasing commissions, etc.

With respect to hard costs, the figure estimated above includes approximately \$100.0 million for site preparation inclusive of de-mucking and filling activities and wetland mitigation. The Applicant further estimates that it will cost approximately \$1.14 billion to construct the uses shown above. Included in this figure are the cost of building the structures and allowances for tenant improvements, where appropriate. It also includes the costs of the on-site infrastructure such as roads, the water and sewer

systems, drainage, landscaping, signage, etc. Not included in the Applicant's estimate is the cost of off-site infrastructure improvements that may be required to support the proposed Employment Center project, which have not been estimated at this time.

With respect to the costs of construction, **Table 10-1B, Unit Cost of Construction by Use**, shows the unit costs associated with the various uses.

Table 10-1B Unit Cost of Construction By Use		
Use	Unit of Cost	Amount
Office	SF	\$225
Flex	SF	\$100
Distribution	SF	\$80
Limited Service Hotel	Room	\$116,000
Full Service Hotel	Room	\$236,000
Retail/Restaurant	SF	\$156
Rental Apartments	Apartment	\$145,000

Source: The Graham Companies; Miami Economic Associates, Inc.

In terms of timing, the bulleted paragraphs below provide a set of assumptions or use in analyzing the project:

- Site preparation will commence in January 2017 in three years and be completed by the end of 2019. The level of effort on an annual basis during the three year period would be approximately equal during that period.
- Construction activity on the various structures will commence in accordance with the schedule set forth in **Table 10-1C, Date of Beginning of Construction**, with construction commencing on January 2nd of the year shown. The 50,000 square foot office building scheduled to begin construction in 2019 and all the flex and distribution space will be completed by December 31st of the year in which construction commences. All other structures will be completed by December 31st of the year after the one in which construction commences.

Table 10-1D, Annual Construction Expenditure by Activity/Use, estimates the amount of the construction expenditures that will occur in each year development activity occurs by activity or use. It is estimated that 15 percent of the amounts shown for site preparation will represent labor expense while 45 percent of the amounts shown for the construction of the various uses will represent labor expense.

Table 10-1C Date of Beginning of Construction*									
Year	Office (SF)	Flex (SF)	Distribution (SF)	Limited Service Hotel (Rooms)	Full Service Hotel (Rooms)	Neighborhood Retail (SF)	Regional Retail (SF)	Rental Apartments (Units)	
2017	0	0	0	0	0	0	0	0	
2018	0	0	0	0	0	0	0	250	
2019	50,000	50,000	100,000	0	0	125,000	400,000	250	
2020	250,000	0	0	300	0	0	200,000	250	
2021	0	75,000	100,000	0	500	0	150,000	0	
2022	250,000	0	0	300	0	0	25,000	250	
2023	0	75,000	100,000	0	0	0	0	250	
2024	250,000	0	0	0	0	0	25,000	250	
2025	0	0	0	0	500	0	0	0	
2026	250,000	0	0	0	0	0	25,000	250	
2027	0	0	0	0	0	0	0	250	
2028	250,000	0	0	0	0	0	25,000	0	
2029	0	0	0	0	0	0	0	0	
2030	230,000	0	0	0	0	0	25,000	0	
Total	1,530,000	200,000	300,000	600	1,000	125,000	875,000	2,000	

* Construction assumed to commence on January 2 of year shown

Source: The Graham Companies; Miami Economic Associates, Inc.

Table 10-1D
Annual Construction Expenditures By Activity/Use **
(Millions of 2015 Dollars)

Year	Site Preparation	Office (SF)	Flex (SF)	Distribution (SF)	Limited Service Hotel (Rooms)	Full Service Hotel (Rooms)	Neighborhood Retail (SF)	Regional Retail (SF)	Rental Apartments (Units)
2017	34.0	0	0	0	0	0	0	0	0
2018	33.0	0	0	0	0	0	0	0	18.2
2019	33.0	11.3	5.0	8.0	0	0	9.7	31.2	36.5
2020	0	28.1	0	0	17.4	0	9.8	46.8	36.5
2021	0	28.1	7.5	8.0	17.4	59.0	0	27.3	18.3
2022	0	28.1	0	0	17.4	59.0	0	13.7	18.2
2023	0	28.1	7.5	8.0	17.4	0	0	2.0	36.5
2024	0	28.1	0	0	0	0	0	2.0	36.5
2025	0	28.1	0	0	0	59.0	0	2.0	18.3
2026	0	28.1	0	0	0	59.0	0	2.0	18.2
2027	0	28.1	0	0	0	0	0	2.0	36.5
2028	0	28.1	0	0	0	0	0	2.0	18.3
2029	0	28.1	0	0	0	0	0	2.0	0
2030	0	25.9	0	0	0	0	0	2.0	0
2031	0	25.9	0	0	0	0	0	2.0	0
Total	100.0	344.1	20.0	24.0	69.6	236.0	19.5	137.0	292.0

** Labor expense will account for 15 percent of the expenditures for site preparation and 45 percent of the construction costs of the various uses.
Source: The Graham Companies; Miami Economic Associates, Inc.

As discussed above, impact fees and building permit fees will account for a portion of the moneys spent on soft costs. In response to Question 11, it is estimated that impact fees in the amounts shown below will potentially need to be paid. However, the actual amount paid will be dependent on the extent to which credits are applied for off-site infrastructure improvements that The Graham Companies fund directly.

- Roads: \$43.3 million
- Fire: \$2.67 million
- Police: \$2.58 million
- Parks: \$4.45 million
- Schools: \$3.06 million

It is also estimated in response to Question 11 that general building permit fees in the amount of \$745,000 will need to be paid. Additional trade-related building permit fees will also need to be paid by the roofing, plumbing, electrical, structural and mechanical contractors involved in building the project; however, the plans for the proposed project are not sufficiently detailed at this time to estimate the trade-related building permit fees with specificity.

G. Project Cost Table

Response not required.

H. Inputs for Economic and Fiscal Impact Models

Response not required.

PART 2 CONSISTENCY WITH COMPREHENSIVE PLANS

- A. Demonstrate how the proposed project is consistent with the local comprehensive plan and land development regulations. Indicate whether the proposed project will require an amendment to the adopted local comprehensive plan, including the capital improvements element. If so, please describe the necessary changes.**

The development proposed will require a Future Land Use Map amendment to the Miami-Dade County Comprehensive Development Master Plan to change land uses. This additional material is being submitted to the County in support of the CDMP amendment application.

The proposed project supports many of the Miami-Dade CDMP Goals, Objectives and Policies. Several of these policies are shown in bold below, followed by an explanation of how the project is supportive.

LU-1B. Major centers of activity, industrial complexes, regional shopping centers, large-scale office centers and other concentrations of significant employment shall be the structuring elements of the metropolitan area and shall be sited on the basis of metropolitan-scale considerations at locations with good countywide, multi-modal accessibility.

This policy encourages major centers of activity, to be sited at locations with good countywide, multi-modal accessibility. The proximity of the Subject Property to the HEFT and I-75 makes this an ideal location for a major employment center.

LU-1C. Miami-Dade County shall 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 all necessary urban services and facilities are projected to have capacity to accommodate additional demand.

CDMP Land Use Element Policy LU-1C requires the County to give priority to infill development on vacant sites in the currently urbanized areas. Approval of this application will serve to give priority to infill development on vacant sites in currently urbanized areas as the application provides for infill development and the application area is comprised of vacant parcels abutting urbanized areas.

LU-10. Miami-Dade County shall seek to prevent discontinuous, scattered development at the urban fringe particularly in the Agriculture Areas, through its CDMP amendment process, regulatory and capital improvements programs and intergovernmental coordination activities.

CDMP Land Use Element Policy LU-10 requires the County to “prevent discontinuous, scattered development at the urban fringe.” The Property is infill development with surrounding lands developed or proposed for major development. To the west are lands that either have been or are under excavation; to the east is I-75 and existing development; to the south is a planned industrial park; and, to the north is the proposed American Dream Miami development. A well-planned mixed use project would further enhance the uses to the east of the Property and throughout the County.

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 Services (LOS) standards specified in the Capital Improvements Element (CIE).

CDMP Land Use Element Policy LU-2A establishes that developments orders will only be approved for projects when the provision public services and facilities for the proposed development result in a LOS that meets or exceeds the standards identified in CIE. The proposed amendment, subject to the proffered declaration of restrictions, is expected to have no significant impact on public infrastructure. Because of the location of the residential development east of the Property, a water main and sewer force main already exist and extend east of the site. The Applicant has begun discussions with the Miami-Dade Water and Sewer Department to ensure that it will be able to connect to these lines after approval of this Application.

LU-8A. Miami-Dade County shall strive to accommodate residential development in suitable locations and densities which reflect such factors as recent trends in location and design of residential units; a variety of affordable housing options; projected availability of service and infrastructure capacity; proximity and accessibility to employment, commercial and cultural centers; character of existing adjacent or surrounding neighborhoods; avoidance of natural resources degradation; maintenance of quality of life and creation of amenities. Density patterns should reflect the Guidelines for Urban Form contained in this Element.

CDMP Land Use Element Policy LU-8A requires the County to strive to accommodate proximity and accessibility to employment, commercial and cultural centers, as well as create amenities. The proposed project serves as an accessible employment, immediately adjacent to an existing residential area. Furthermore, the proximity to the HEFT and I-75 makes it an ideal location for this development.

TE-1A. As provided in this section and the Mass Transit Subelement, the County shall promote mass transit alternatives to the personal automobile, such as rapid transit (i.e. heavy rail, light rail, and bus rapid transit, premium transit (enhanced and/or express bus)), local route bus and paratransit services.

CDMP Transportation Element Policy TE-1A requires the County to promote mass transit alternatives to personal automobiles. The proposed project will be designed to accommodate mass transit buses on-site. Furthermore, the project's residents and employment center employees provide ridership that will support the Palmetto Express Bus proposed in the CDMP Mass Transit subelement. See Figure 1 – Future Mass Transit System 2030 Metrobus Service Area and Rapid Transit Corridor, page II-39 of the Transportation Element. The Palmetto Express Bus route runs from the intersection of NW 186 Street and I-75 to the Palmetto Metrorail Station.

TE-2G. The County shall encourage inclusion in, and review, all plans and development proposals for provisions to accommodate safe movement of bicycle and pedestrian traffic, and facilities for securing non-motorized vehicles in all new development and redevelopment and shall address this as a consideration in development and site plan review.

CDMP Transportation Element Policy TE-2G encourages the County to accommodate the safe movement of bicycle and pedestrian traffic. The proposed project will be designed to provide safe movement of bicycle and pedestrian to and throughout the development. The project will encourage multimodal transportation alternatives to the personal automobile. Sidewalk and bike paths will be provided all through the project and bike racks will be sited at convenient and safe locations.

TC-5D. The County shall encourage interconnectivity between neighborhoods, local services, schools, parks, employment centers, and transit stops and stations; discourage cul-de-sac and walled-in subdivision designs; and facilitate pedestrian-oriented urban design that connects neighborhoods and provides accessibility for non-drivers.

CDMP Traffic Circulation Subelement Policy TC-5D encourages the County to promote interconnectivity between uses and accessibility for persons not traveling by automobile. As stated previously, the proposed project supports the interconnection of the proposed project to the Metrorail at the Palmetto Station by way of the proposed Palmetto Express Bus. Furthermore, the proposed project will be a dense, urban design that will promote pedestrian and bicycle activity.

CHD-1E. Designate locations for carpooling and bus stops that encourage residents to maintain a daily level of walking as part of their commute, and are designed in a manner that reflects the character of the community or district where the stops are located.

CDMP Community Health and Design Policy CHD-1E seeks locations and designs of carpooling and bus stops that encourage walking while being appropriately integrated into the design of the community.

B. Describe how the proposed development will meet goals and policies contained in the appropriate Regional Comprehensive Policy Plan.

Approval of the Project will be consistent with the following goals and policies of the Strategic Regional Policy Plan for South Florida (SRPP):

- Policy 6.9 of the SRPP (page 43) promotes the increased use of mixed densities and housing product types within residential developments to encourage the construction of a greater diversity of housing choices. The proposed 2,000 rental dwelling units that are part of the mixed-use development will provide a housing choice for working individuals and families types within a single community and will, therefore, be supportive of this policy.
- Policy 11.2 of the SRPP (page 62) encourages development of mixed land uses and activities within communities to foster more balanced and energy-efficient development pattern, which are characterized by appropriate density, diverse economic, employment, and housing opportunities, and public transportation access. The proposed project will feature a well-integrated mix of residential, retail and service, office, industrial, and public facility uses that will create a more balanced and energy-efficient development pattern in this area of Miami-Dade County.
- Policy 12.3 of the SRPP (page 66) discourages the expansion of urban services into former agricultural areas except where the expansion is necessary to accommodate projected population growth and when the proposed densities will be sufficient to support public transportation. The evidence supports a conclusion that Miami-Dade County needs land to accommodate projected residential growth. The proposed project will be of a sufficient density to support public transportation.

- Policy 12.4 of the SRPP (page 66) provides that, should land be converted from agriculture to urban uses, local governments should discourage sprawl patterns of development and require urban design and density necessary to support pedestrian-orientation, public transportation, and the efficient provision of other infrastructure. The proposed project is being designed in a manner that is sufficiently dense, with a mixing of residential, commercial, and public facility uses, to encourage pedestrian activity and the use of public transportation. Unlike a typical suburban development, the proposed project will also employ infrastructure in an efficient manner.
- Policy 20.7 of the SRPP (Page 88) encourages the use of innovative site design and transit-oriented development to facilitate pedestrian and bicycle movement and increase the use of public transportation. The proposed project is being designed in a manner to encourage residents to attend to their daily needs and activities through pedestrian, bicycle and mass transit movement as much as possible.
- Policy 20.13 of the SRPP (page 95) encourages the establishment of greenways and multi-use recreational trails. The proposed project is being designed to provide a full network of pedestrian and bicycle routes throughout the community.

C. Describe how the proposed development will meet goals and policies contained in the State Comprehensive Plan (Chapter 187, F.S.), including, but not limited to, the goals addressing the following issues: housing, water resources, natural systems and recreational lands, land use, public facilities, transportation, and agriculture.

Approval of the proposed project will be consistent with the following goals and policies of the State Comprehensive Plan:

- Housing Policy 4 encourages the reduction of unnecessary regulatory practices that add to the cost of housing. The approval of the project will provide additional housing opportunities for nearly 2,000 families in Miami-Dade County, therefore encouraging the reduction of the cost of existing and other new residential units.
- The Water Resources goal requires the continued availability of an adequate supply of water for all competing uses. Approval of the development will not have a measurable negative impact on the availability and quality of water resources in Miami-Dade County.
- The Natural Systems and Recreational Lands goal requires the protection of wetlands, tropical hardwood hammocks, etc. The development will not result in damage to or the destruction of any of these important natural systems. The Project will also be providing approximately 90 acres of new park and open land, including multiple waterways.
- The Land Use goal requires that developments shall be directed to areas that have in place, or have agreements to provide, the land and water resources, fiscal abilities, and service capacity to accommodate growth in an environmentally acceptable manner. The proposed development is immediately adjacent to currently existing urban infrastructure. The development will not pose a risk to environmentally sensitive lands.

- The Transportation goal encourages the integration of various transportation modes. The Project has been designed to accommodate a future rail connection that could provide easy access to eastern areas of Miami-Dade County.

The Agriculture goal requires the State to maintain and encourage the continued health of the agriculture industry. The Subject Property, located immediately adjacent to existing dense urban development, is not conducive to long-term agricultural uses.

PART 3 DEMOGRAPHIC AND EMPLOYMENT INFORMATION

A. Complete the following Demographic and Employment Information tables.

Table 10-3A, Project Population, provides demographic information with respect to the households that will reside in the 2,000 rental apartment units at the Employment Center project that The Graham Companies are proposing to develop in northwestern Miami-Dade County.

TABLE 10-3A Project Population					
Phase	Total Dwelling Units **	Persons Per HH ***	Total Persons	Total School Age Children ****	Total Elderly
Total	2,000	2.71	5,420	671	N/A
<p><i>** Rental apartments units</i></p> <p><i>*** Based from the 2013 ACS 5-Year Estimate compiled by Planning Division of Miami-Dade County Department of Regulatory and Economic Resources.</i></p> <p><i>**** Estimate provided by Mr. Ivan Rodriquez of the Miami-Dade Public School District.</i></p> <p><i>***** It is anticipated that the overwhelming predominance of the residents will be in households in which one member will be employed at the Employment Center itself, American Dream Miami to the north or the Beacon Countyline industry project to the south.</i></p>					

Source: The Graham Companies; American Community Survey 2013 Five-Year Estimates; Planning Division, Miami-Dade County Department of Regulatory and Economic Resources, Miami-Dade Public School District; Miami Economic Associates, Inc.

With respect to the information presented above, the following points are noted:

- As shown in response to Question 24, it is expected 1,600 of the 2,000 proposed rental apartment units will be either 1-bedroom or 2-bedroom units. On that basis, it is likely that estimate of persons per household shown above is high and the on-site population when all the units are constructed will be lower.
- The Miami-Dade Public School District estimated that he 671 students would include 291 elementary, 187 middle and 193 high school students. The District also indicated that sufficient capacity currently exists at all three levels to accommodate these students.
- It is anticipated that the overwhelming preponderance of the resident will be in households in which at least one member will be employed at the proposed Employment Center itself, American Dream Miami to the north or the Beacon Countyline industrial project to the south. Given that and mix of units be number of bedrooms, it is unlikely that a significant number of elderly people will live in the proposed rental apartment units.

Table 10-3B, Estimated Employment by Income Range, provides information on the estimated employment at the project both during the period in which it is being developed and on a permanent basis after construction is completed. For the purpose of this table, construction employment is expressed in terms of the total number of worker-years of employment that will required to complete the proposed project during the entirety of the period from 2017 to 2031 when site preparation and construction is on-going. The estimate of permanent employment represents the number of workers that will be employed on-site annually when the project has been fully developed. However, it is likely that more people will work on-site annually than the number of FTE’s shown because part-time

workers comprise significant percentages of the people employed in the retail, food and beverage and hospitality industry sectors. The table further assumes that all the construction workers as well as all the FTE's employed on a permanent basis annually will earn wages and salaries at or above minimum wage which currently equates to \$16,744 in the State of Florida for workers who record 40 hours a week for 52 weeks a year.

Table 10-3B Estimated Employment by Income Range (2014 Dollars)							
Type of Employment	\$16,744 – \$19,999**	\$20,000 – \$24,999	\$25,000 – \$29,999	\$30,000 – 34,999	\$35,000 – \$39,999	\$40,000 or more	Total
Construction***	59	39	68	157	196	8,523	9,043
Permanent****	833	580	749	649	236	6,908	9,955

** \$16,744 equates to the annual earnings of minimum wage worker in Florida who works 40 hours a week for 52 weeks.
 *** Total worker-years over the entirety of the period from 2017 to 2031 in which construction of the project occurs.
 **** Full-time equivalents on an annual basis.

Source: International Atlantic, LLC; Annual Census of Employment and Wages for Miami-Dade County, 2014; Miami Economic Associates, Inc.

The above estimate of worker-years of construction employment assumes the following:

- As discussed in the response to Question 10, Part 1F, it is estimated that \$15.0 million of the \$100.0 million spent for site preparation will be spent on wages and salaries. For the purpose of this analysis, it was assumed that the workers involved in the activity would be in NAICS Code 237 and would make an average \$57,001 annually. That figure is based on the Annual Survey of Employment and Wages compiled by the State of Florida Department of Economic Opportunity for Miami-Dade County for 2014, which is most recent such data available. The expenditure of \$15.0 million would support a total of 263 workers at their annual average rate of earnings.
- As discussed in response to Question 10, Part 1F, it is estimated that \$1.142.2 billion will be spent to construct the various uses at the proposed Employment Center in terms of hard costs. Of this amount, \$292.0 million will be spent on rental apartments and the \$850.2 million on the non-residential uses. For the purpose of this analysis, it was assumed that the workers who construct the apartments will be in NAICS Code 2361 and will make an average of \$60,311 annually while the workers who will construct the non-residential uses will be in NAICS Code 2362 and will make an average of \$62,545 annually. On this basis and assuming that labor costs represent 45 percent of total hard cost, the money spent to build the apartments would support 2,163 workers at their annual average rate of earnings while the money spent to build the non-residential uses would support 6,117 workers.

The above estimate of the number of FTE's that will be employed at the proposed Employment when development of the entirety of the project is completed is based on the following assumptions:

- The office space will be generally occupied at a ratio of 4 workers per 1,000 square feet consistent with the industry average; however, 50,000 square feet will be used as an outpatient care center and have a staff of 100 workers.
- The distribution space will be occupied at a ratio of 1.25 workers per 1,000 square feet consistent with the industry average.
- The flex space, which will basically serve as an office use, will be occupied at a ratio of 3 employees per 1,000 square feet reflecting the fact that approximately 70 percent of the total space will be used in that manner while the remainder will be used for storage.
- All of the retail and food and beverage space in both the neighborhood and regional facilities will have a ratio of 2 employees per 1,000 square feet reflecting the presence of supermarket, a major pharmacy and big box retailers in the tenant mix.
- The limited service hotels will have a ratio of 0.35 workers per room while the full service hotels will have a ratio of 0.75 workers per room consistent with industry averages.
- There will be additional workers on the site who will be involved in property management, leasing and promotion as well as maintenance, janitorial, security and parking operations. A staffing schedule for this portion of the on-site workforce has not yet been determined.

Table 10-3C, Distribution of Employees by NAICS Code, shows the distribution of the on-site 9,955 workers reflected in the preceding table by NAICS Code. It also shows there average wage level based in the Annual Census of Employment and Wages for Miami-Dade County for 2014. Finally, it shows the build-up of the workforce during the development period based on the construction schedule provided in response to Question 10, Part 1F. The table also takes into account assumption regarding the pace at which absorption occurs that are present in Question 11 with respect to manner in which sales tax revenues were calculated.

**Table 10-3C
Distribution of Employees By NAICS Code**

Industry Sector	NAICS Code	Average Earnings	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
Office																	
Publishing	511	\$65,454	0	0	18	8	18	8	18	8	18	9	19	9	17	8	158
Telecommunications	517	\$74,205	0	0	94	40	94	40	94	40	94	40	98	42	90	39	805
Data Processing	518	\$78,005	0	0	47	20	47	20	47	20	47	20	49	21	45	19	402
Other Information Services	519	\$83,293	0	0	18	8	18	8	18	8	18	8	19	8	17	7	155
Credit Intermediation	522	\$79,248	0	0	50	0	50	0	50	0	50	0	0	0	0	0	200
Insurance	524	\$70,398	0	0	118	50	118	50	118	50	118	50	123	51	113	47	1,006
Real Estate	531	\$50,506	0	0	117	50	117	50	117	50	117	50	122	51	114	47	1,002
Rental & Leasing Services	532	\$45,995	0	0	22	8	22	8	22	8	22	8	23	9	20	8	180
Professional & Technical Services	541	\$78,392	0	0	94	40	94	40	94	40	94	40	98	42	90	39	805
Management of Companies & Enterprises	551	\$117,922	0	0	94	40	94	40	94	40	94	40	98	42	90	39	805
Office Administrative Services	5611	\$69,559	0	0	47	20	47	20	47	20	47	20	49	21	45	19	402
Outpatient Care Centers	6214	\$50,463	0	100	0	0	0	0	0	0	0	0	0	0	0	0	100
Distribution																	
Merchant Wholesalers, Non-Durable Goods	424	\$58,852	125	0	125	0	125	0	0	0	0	0	0	0	0	0	375
Flex																	
Architecture & Engineering	5413	\$65,910	37	0	56	0	57	0	0	0	0	0	0	0	0	0	150
Scientific Research & Development Services	5417	\$69,586	38	0	56	0	56	0	0	0	0	0	0	0	0	0	150
Other Professional & Technical Services	5419	\$46,851	38	0	56	0	56	0	0	0	0	0	0	0	0	0	150

Table 10-3C
Distribution of Employees By NAICS Code

Industry Sector	NAICS Code	Average Earnings	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
Activities related to Real Estate	5313	\$49,596	37	0	57	0	56	0	0	0	0	0	0	0	0	0	150
Hotels																	
Traveler Accommodation	7211	\$32,775	0	0	105	375	105	0	0	375	0	0	0	0	0	0	960
Subtotal			275	100	1,174	659	1,174	284	719	659	719	285	698	296	641	272	7,955
Retail																	
Home Furnishings	4421	\$27,708	0	0	200	0	0	0	0	0	0	0	0	0	0	0	200
Electronics & Appliances	443	\$40,457	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
Building Materials & Garden Supplies	444	\$32,604	0	400	0	0	0	0	0	0	0	0	0	0	0	0	400
Grocery Stores	4451	\$21,938	0	94	0	0	0	0	0	0	0	0	0	0	0	0	94
Specialty Food	4452	\$24,025	0	8	0	0	0	0	0	0	0	0	0	0	0	0	8
Beer, Wine & Liquor	4453	\$23,222	0	8	0	0	0	0	0	0	0	0	0	0	0	0	8
Health & Personal Care	446	\$33,550	0	44	0	0	0	0	0	0	0	0	0	0	0	0	44
Clothing Stores	448	\$23,555	0	0	150	100	0	0	0	0	0	0	0	0	0	0	250
General Merchandise	452	\$22,760	0	300	0	0	0	0	0	0	0	0	0	0	0	0	300
Florist	4531	\$36,198	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
Office Supplies, Stationery & Gifts	4532	\$28,632	0	0	0	150	0	0	0	0	0	0	0	0	0	0	150
Credit Intermediation	522	\$79,248	0	16	0	0	0	0	0	0	0	0	0	0	0	0	16
Food Services & Drinking Places	722	\$21,561	0	150	50	50	50	0	50	0	50	0	50	0	50	0	500
Personal Services	812	\$23,642	0	18	0	0	0	0	0	0	0	0	0	0	0	0	18
Subtotal			0	1,050	400	300	50	0	50	0	50	0	50	0	50	0	2,000
Total			275	1,150	1,574	959	1,224	284	769	659	769	285	748	296	691	272	9,955

Source: The Graham Companies; Annual Census of Employment and Wages for Miami-Dade County, 2014; Miami Economic Associates, Inc.

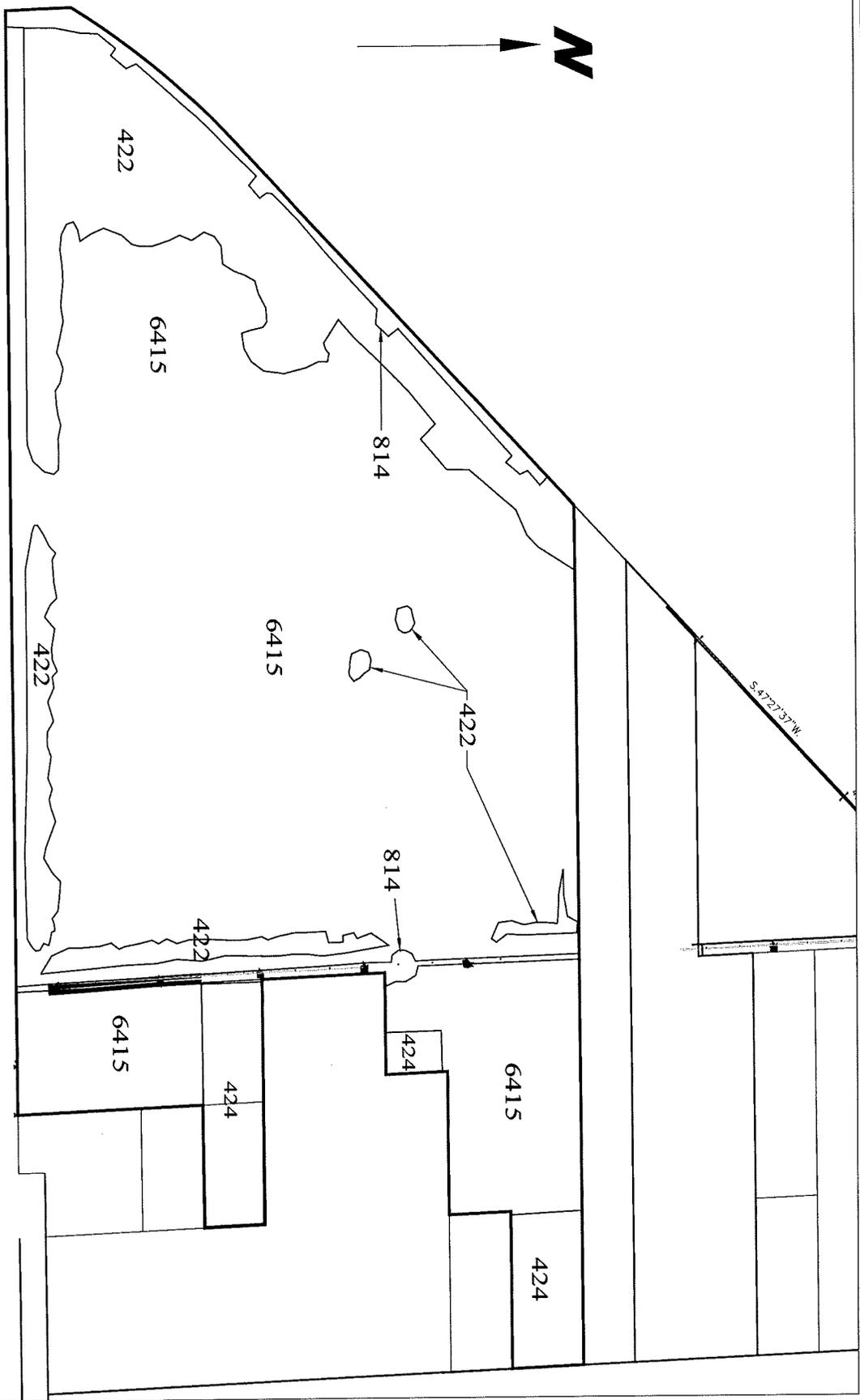
PART 4 IMPACT SUMMARY

A. Summarize the impacts this project will have on natural resources.

Questions 12 through 16 address the project impacts and mitigation strategies for addressing vegetation, wildlife, wetland, natural resources, soils and floodplain considerations. Currently there are no net negative impacts anticipated.

B. Summarize public facility capital costs associated with project impacts using the following table.

TABLE 10-4A PUBLIC FACILITIES CAPITAL COSTS		
Facility	Total Capital Costs	Responsible Entity
Transportation (External)	Fair Share cost to be determined	State of Florida, Miami-Dade County
Wastewater	Equal to connection charges collected.	Miami-Dade Water & Sewer
Potable Water		
Recreation/Open Space	None anticipated	Miami-Dade County
Education	None anticipated	Miami-Dade County Public Schools



FLUCCS CODE LEGEND
 422 - Brazilian pepper
 424 - Melaleuca
 814 - Roads & Highways
 6415 - Dog Fennel & Low Marsh Grasses

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DATE:	11/15
SCALE:	NTS
DESIGN BY:	MJN
DRAWN BY:	MJN
CHECKED BY:	MJN
APPROVED BY:	MJN
DATE:	2012
DESCRIPTION:	

GRAHAM PROPERTY

MIAMI-DADE COUNTY **FLORIDA**

FLORIDA LAND USE COVER & FORMS CLASSIFICATION SYSTEM MAP

MJN PROJ. No.: 15-104 **SHEET No.: 1 OF 1**

Question 11 – Revenue Generation Summary

1. Project the funds anticipated to be generated by the project. This projection should include any source or use of funds which could have any reasonable connection to the proposed development

1. Make the following projections by year, including the first and last year in which any construction and/or development takes place:

(a) Yearly ad valorem tax receipts

(b) Yearly impact fees collected

(c) Yearly sales tax received by local government

(d) Yearly gasoline tax received by local government

(e) Yearly projections of any other funds by any other sources generated as a result of development of the proposed project within the region

Table 11-1, Revenue Generation – Miami-Dade County, estimates, to the extent possible based on the information currently available, the non-recurring and recurring revenues that The Graham Companies' proposed Employment Center project in northwestern Miami-Dade County will generate for Miami-Dade County. **Table 11-2, Revenue Generation – Other Governmental Jurisdictions**, estimates, to the extent possible based on information currently available, the non-recurring and recurring revenues that will be generated for other governmental jurisdictions in which the proposed project will be located, including the following:

- Miami-Dade County Public Schools
- Children's Trust
- South Florida Water Management District
- Everglades Project
- Okeechobee Basin
- Florida inland Navigation District
- State of Florida.

Table 11-1

Revenue Generation – Miami-Dade County

Proposed Employment Center Project (000's of 2015 Dollars)

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Total
Non-Recurring																	
Impact Fees **																	
Roads	0.0	1,355.9	5,466.6	7,765.2	6,176.0	3,731.2	1,835.8	3,723.7	3,599.1	3,723.7	1,355.9	2,367.9	0.0	2,201.2	0.0	0.0	43,302.1
Fire	0.0	102.9	500.1	332.2	378.0	269.1	260.8	195.7	154.1	195.7	102.9	92.8	0.0	86.2	0.0	0.0	2,670.8
Police	0.0	134.3	404.6	352.4	251.6	302.8	199.6	236.8	130.5	236.8	134.3	102.52	0.0	95.1	0.0	0.0	2,581.4
Parks	0.0	561.5	561.5	561.5	0.0	561.5	561.5	561.5	0.0	561.5	561.5	0.0	0.0	0.0	0.0	0.0	4,492.3
Building Permits																	
General	0.0	34.6	120.1	103.561	79.5	82.9	55.3	67.0	41.2	67.0	34.6	32.4	0.0	27.1	0.0	0.0	745.4
Trade-related	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Total Non-Recurring	0.0	2,189.3	7,053.0	9,114.9	6,885.1	4,947.7	2,912.9	4,784.8	3,924.9	4,784.8	2,189.3	2,595.6	0.0	2,409.6	0.0	0.0	53,791.9
Recurring																	
Ad valorem Taxes																	
General Fund	0.0	0.0	0.0	219.3	748.6	1,464.1	2,025.3	2,630.2	2,793.5	3,205.9	3,672.6	4,085.0	4,248.3	4,497.4	4,497.4	4,727.9	38,815.5
Debt Service	0.0	0.0	0.0	21.1	72.2	141.1	195.2	253.6	269.3	309.0	354.0	393.8	409.5	433.5	433.5	455.8	3,741.8
Fire Fund	0.0	0.0	0.0	113.8	388.3	759.4	1,050.5	1,364.3	1,449.0	1,662.9	1,905.0	2,118.9	2,203.6	2,332.8	2,332.8	2,452.4	20,133.6
Fire Debt Service Fund	0.0	0.0	0.0	0.4	1.3	2.6	3.6	4.7	5.0	5.8	6.6	7.4	7.6	8.1	8.1	8.5	69.9
Library Fund	0.0	0.0	0.0	13.4	45.6	89.2	123.3	160.2	170.1	195.2	223.7	248.8	258.7	273.9	273.9	287.9	2,363.9
UMSA Fund	0.0	0.0	0.0	90.6	309.3	605.0	836.9	1,086.8	1,154.3	1,324.7	1,517.5	1,687.9	1,755.4	1,858.3	1,858.3	1,953.6	16,038.6
Total Ad valorem Taxes	0.0	0.0	0.0	458.6	1,565.3	3,061.4	4,234.9	5,499.7	5,841.2	6,703.5	7,679.4	8,541.7	8,883.2	9,404.1	9,404.1	9,886.0	81,163.3
Non-Ad Valorem Revenues																	
State Sales Tax	0.0	0.0	0.0	38.3	921.2	1,294.2	1,529.4	1,674.4	1,889.3	1,981.5	1,997.6	2,025.5	2,098.5	2,165.9	2,169.0	2,211.6	21,996.4
Local Option Sales Taxes	0.0	0.0	0.0	94.6	2,274.8	3,195.5	3,775.9	3,134.4	4,664.8	4,892.6	4,932.3	5,124.7	5,181.4	5,347.8	5,355.6	5,460.6	53,435.0
Hotel Occupancy Tax	0.0	0.0	0.0	0.0	0.0	682.8	2,494.6	3,313.9	3,450.3	3,484.8	5,258.7	5,357.3	5,455.8	5,455.8	5,455.8	5,455.8	45,865.5
Water & Sewer User Charges	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Stormwater Fees	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Franchise Fees/ Utility Taxes	0.0	0.0	0.0	105.3	369.8	654.7	783.8	1,004.6	1,121.7	1,299.9	1,383.4	1,460.5	1,555.5	1,731.9	1,762.5	1,832.2	15,065.8
Business Tax	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Gasoline Tax	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Total Non-Ad valorem Revenues	0.0	0.0	0.0	238.2	3,565.8	5,827.2	8,583.7	9,127.3	11,126.1	11,658.8	13,572.0	13,968.0	14,291.2	14,701.4	14,742.9	14,960.2	136,362.7
Total Recurring	0.0	0.0	0.0	696.8	5,131.1	8,888.6	12,818.6	14,627.0	16,967.4	18,362.3	21,251.4	22,509.7	23,174.4	24,105.5	24,147.0	24,846.2	217,526.1

* Cannot be estimated at this time based on the information currently available

** The actual amounts paid in impact fees will be dependent on the extent to which The Graham Companies receive credits for infrastructure improvements that are directly funded.

Source: The Graham Companies; Miami-Dade County; Miami-Dade County Property Appraiser; Munnilytics; Miami Economic Associates, Inc.

Table 11-2
Revenue Generation – Other Governmental Jurisdictions
(000's of 2015 Dollars)

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Total
Miami-Dade County Public Schools																	
Non-Recurring																	
School Impact Fee	0.0	382.5	382.5	382.5	0.0	382.5	382.5	382.5	0.0	382.5	382.5	0.0	0.0	0.0	0.0	0.0	3,060.0
Recurring																	
Ad Valorem																	
General Fund	0.0	0.0	0.0	348.4	1,189.08	2,325.6	3,217.0	4,177.8	4,437.20	5,092.3	5,833.6	6,488.6	6,748.0	7,143.7	7,143.7	7,509.8	61,654.6
Debt Service	0.0	0.0	0.0	9.3	31.9	62.4	86.3	112.0	119.0	136.6	156.5	174.0	181.0	191.6	191.6	201.4	1,653.5
Total Ad Valorem Taxes	0.0	0.0	0.0	357.8	1,221.0	2,387.9	3,303.3	4,289.9	4,556.2	5,228.8	5,990.0	6,662.6	6,929.0	7,335.3	7,335.3	7,711.2	63,308.2
Children's Trust																	
Ad Valorem Taxes	0.0	0.0	0.0	23.5	80.2	156.8	216.9	281.7	299.2	343.4	393.3	437.5	455.0	481.7	481.7	506.4	4,157.1
South Florida Water Management																	
Ad Valorem Taxes	0.0	0.0	0.0	6.8	23.4	45.7	63.2	82.1	87.2	100.0	114.6	127.5	132.5	140.3	140.3	147.5	1,211.0
Everglades Construction Project																	
Ad Valorem Taxes	0.0	0.0	0.0	2.4	8.1	15.8	21.9	28.4	30.2	34.6	39.7	44.1	45.9	48.6	48.6	51.1	419.2
Okeechobee Basin																	
Ad Valorem Taxes	0.0	0.0	0.0	7.5	25.5	49.8	68.9	89.4	95.0	109.0	124.9	138.9	144.4	152.9	152.9	160.7	1,319.7
Florida Inland Navigation District																	
Ad Valorem Taxes	0.0	0.0	0.0	1.5	5.2	10.1	14.0	18.1	19.3	22.1	25.3	28.2	29.3	31.0	31.0	32.6	267.8
State of Florida																	
Non-recurring																	
Sales Tax	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Recurring																	
Sales Tax	0.0	0.0	0.0	516.6	12,420.2	17,447.3	20,616.2	22,573.9	25,469.9	26,713.8	27,630.1	27,980.7	28,290.6	29,198.9	29,241.5	29,815.0	297,914.7

* Cannot be estimated at this time based on the information currently available

Source: The Graham Companies; Miami-Dade County; Miami-Dade County Property Appraiser; Muniylitics; Miami Economic Associates, Inc.

2. List all assumptions used to derive the above projections and estimates, show the methodologies used and describe the generally accepted accounting principles used in all assumptions, estimates and projections.

The materials that follow provide the bases used in formulating the revenue estimates provided in **Tables 11-1 and 11-2**, preceding.

Project Description

For the purpose of this analysis, an illustrative development program has been formulated for the proposed Employment Center project. However, it should be remembered that the market will dictate how the project ultimately gets developed over the course of the next 15 years and what is actually built may differ from the program used in this analysis. Further, the tax rates and fee schedules used in this analysis will likely change over time while market considerations the rental rates and other revenues assumed in this analysis. Accordingly, the revenues that the various governmental jurisdictions actually collect between 2017 and 2032 may differ from those projected and the variances could be significant.

According to the illustrative development formulated for the Employment Center for the purpose of this analysis, the proposed project will be comprised of a mixture of uses as follows:

- Business Park
 - 1.53 million square feet of office space
 - 200,000 square feet of flex space
 - 300,000 square feet of distribution space
 - 2 limited service hotels with 300 rooms each
 - 2 full service hotels with 500 rooms each
- Retail/Food and Beverage
 - 125,000 neighborhood shopping center
 - 875,000 square feet of regional retail
- Residential
 - 2,000 rental apartments

Table 11-3, Date of Beginning of Construction, shows the construction schedule assumed in this analysis for the uses enumerated above while **Table 11-4, Year Construction Completed**, shows the anticipated date when construction would be completed. For the purpose of this analysis, it is assumed that all construction will commence on January 2 of the year shown. It was also assumed that all property would be placed on the tax rolls on January 1st of the year following the completion of construction.

**Table 11-3
Date of Beginning of Construction***

Year	Office (SF)	Flex (SF)	Distribution (SF)	Limited Service Hotel (Rooms)	Full Service Hotel (Rooms)	Neighborhood Retail (SF)	Regional Retail (SF)	Rental Apartments (Units)
2017	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	250
2019	50,000	50,000	100,000	0	0	125,000	400,000	250
2020	250,000	0	0	300	0	0	200,000	250
2021	0	75,000	100,000	0	500	0	150,000	0
2022	250,000	0	0	300	0	0	25,000	250
2023	0	75,000	100,000	0	0	0	0	250
2024	250,000	0	0	0	0	0	25,000	250
2025	0	0	0	0	500	0	0	0
2026	250,000	0	0	0	0	0	25,000	250
2027	0	0	0	0	0	0	0	250
2028	250,000	0	0	0	0	0	25,000	0
2029	0	0	0	0	0	0	0	0
2030	230,000	0	0	0	0	0	25,000	0
Total	1,530,000	200,000	300,000	600	1,000	125,000	875,000	2,000

* Construction assumed to commence on January 2 of year shown.
Source: The Graham Companies; Miami Economic Associates, Inc.

**Table 11-4
Year Construction Completed ***

Year	Office (SF)	Flex (SF)	Distribution (SF)	Limited Service Hotel (Rooms)	Full Service Hotel (Rooms)	Neighborhood Retail (SF)	Regional Retail (SF)	Rental Apartments (Units)
2017	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0
2019	0	50,000	100,000	0	0	0	0	250
2020	50,000	0	0	0	0	125,000	400,000	250
2021	250,000	75,000	100,000	300	0	0	200,000	250
2022	0	0	0	0	500	0	150,000	0
2023	250,000	75,000	100,000	300	0	0	25,000	250
2024	0	0	0	0	0	0	0	250
2025	250,000	0	0	0	0	0	25,000	250
2026	0	0	0	0	500	0	0	0
2027	250,000	0	0	0	0	0	25,000	250
2028	0	0	0	0	0	0	0	250
2029	250,000	0	0	0	0	0	25,000	0
2030	0	0	0	0	0	0	0	0
2031	230,000	0	0	0	0	0	25,000	0
Total	1,530,000	200,000	300,000	600	1,000	125,000	875,000	2,000

* Assumes construction completed on December 31 of the year shown.
Source: The Graham Companies; Miami Economic Associates, Inc.

Table 11-5, Taxable Value by Use, shows the taxable values assumed in this analysis for the various uses that assumed in the illustrative development plan. In estimating the taxable values shown consideration was given both to data obtained on the Miami-Dade County Property Appraiser’s website with respect to comparable properties as well as the estimated hard cost to construct each use.

Table 11-5 Taxable Value by Use	
Use	Taxable Value
Business Park	
Office	\$200/SF
Flex	\$90/SF
Distribution	\$75/SF
Limited Service Hotel	\$90,000/room
Full Service Hotel	\$200,000/room
Retail	
Neighborhood Retail	\$115/SF
Regional Retail	\$135/SF
Residential	
Rental Apartments	\$140,000/Unit

Source: The Graham Companies; Miami-Dade County Property Appraiser; Miami Economic Associates, Inc.

NON-RECURRING REVENUES

During the period during which the proposed Employment Center project will be developed, a variety of fees will be paid on a one-time, or non-recurring, basis. The bases for calculating these non-recurring revenues are discussed below. All monetary amounts are in 2015 Dollars.

Impact Fees

Miami-Dade County

Miami-Dade County levies impact fees for roads, police and fire on all the uses assumed in the illustrative development program for the proposed Employment Center project. Park impact fees are also levied on residential uses. In conducting this analysis, the impact fee schedule posted on the County's website as of December 10, 2015 and the construction schedule presented in **Table 11-3** served as the bases for the calculations made. For road impact fees, the rates applied were those shown on the fee schedule for development not located in the Urban In-fill Area. For park impact fees, the District 1 rates were applied.

Miami-Dade County Public School District

The Miami-Dade Public School District receives impact fees on all new residential units. In conducting this analysis, the impact fee schedule posted on the County's website as of December 10, 2015 and the construction schedule presented in **Table 11-3** served as the bases for the calculations made. For the purpose of this analysis, it was assumed that the proposed rental apartment units would average 1,000 square feet in terms of air conditioned space.

Building Permit Fees

Miami-Dade County calculates general building permit fees on non-residential properties as well as multi-family residential projects based on the gross square footage within the proposed structure. For proposed rental apartment units, a building efficiency factor of 85 percent was assumed with the result that the

average unit for the purpose of calculating building permits was considered to be 1,176.5 gross square feet. The building permit fee schedule posted on the County's website as of December 10, 2015 and the construction schedule presented in **Table 11-3** served as the bases for the calculations made. The County also collects fees from the various trades involved in the construction. At this point, plans for the proposed Employment Center project are not sufficiently detailed to calculate these trade-related building permits with specificity.

Water and Sewer Connection Fees

The Miami-Dade County Water and Sewer Authority will charge fees to connect the proposed Employment Center project to its water and sewer systems. The amount of the fees paid will depend on engineering parameters regarding the number and size of meters that have not presently been defined. Accordingly, it is not possible to estimate the amount of the fees that will be paid at this time.

RECURRING REVENUES

Miami-Dade County and the various governmental entities identified in **Table 11-2** will receive recurring revenues annually as a result of the development of the proposed Employment Center. The bases for the recurring revenues projected in **Tables 11.1** and **11.2** are discussed below. All monetary amounts are in 2015 Dollars.

Ad Valorem Taxes

Ad valorem taxes will be paid on the real property in the proposed Employment Center, inclusive of land and buildings, as well as on the personal property contained within the non-residential facilities. The figures shown in **Tables 11-1** and **11-2** include only the amounts that would be paid on real property because there is no basis for estimating within the precision the value of the taxable personal property.

As discussed previously, this analysis assumes that the uses developed in the proposed Employment Center will be placed on the tax rolls on January 1st in the year after the date on which construction is completed, as shown on **Table 11-4**. The ad valorem figures shown in **Tables 11-1** and **11-2** were calculated based on the information contained in **Table 11-5** with respect to taxable values and the millage rates shown in **Table 11-6, Applicable Millage Rates by Jurisdiction**, below.

**Table 11-6
Applicable Millage Rates by Jurisdiction**

Jurisdiction	Millage Rate/ \$1,000 Taxable Value
Miami-Dade County	
General Fund	\$4.6669
Debt Service Fund	\$0.4500
Fire Fund	\$2.4207
Fire Debt Service Fund	\$0.0086
Library Fund	\$0.2840
UMSA Fund	\$1.9283
Miami-Dade Public School District	
Operating Fund	\$7.4130
Debt Service Fund	\$0.1990
Children's Trust	\$0.5000
South Florida Water Management District	
Everglades Construction Project	\$0.0506
Okeechobee Basin	\$0.1586
Florida Inland Navigational District	\$0.0320

Sales Tax

The State of Florida imposes a 6 percent sales tax on certain transactions including retail sales, food and beverage sales in eating and drinking establishments, hotel room charges and rent payments. Approximately 9 percent of the collected amounts are rebated to the counties in which the revenues are collected, with the rebated amounts further distributed divided between the County and to the municipalities within the county, which for this purpose include Unincorporated Municipal Service Area. The County's share of the rebated amount approximates 75 percent.

Miami-Dade County charges an additional one cent in local option sales taxes, the proceeds of which are split evenly between Transit and the Health Trust. For the purpose of this analysis, a number of other assumptions were made, which are as follows:

- A quarter of both the neighborhood and regional retail space will be occupied by food and beverage establishments.
- The neighborhood retail and food and beverage space will achieve average sales volumes of \$250 per square foot while the regional food and beverage space would achieve average sales volumes of \$350 per square foot. It was further assumed that 50 percent of the sales in the neighborhood retail facility and 10 percent of the sales in the regional retail facilities will be exempt from sales tax.
- All of the proposed hotels will achieve occupancy rates of 72 percent in their first year of operation, with occupancy increasing to 76 percent in the second year operations and then stabilizing at 80 percent beginning in the third year. An average daily rate of \$145 per night will be achieved in the limited service hotels while the full service hotels are expected to achieve an average daily rate of \$225 per night. Finally, the revenues collected for rental of rooms in the limited service hotels will account for 80 percent of total revenues and 65 percent of total revenues in the full service hotels.

- The proposed office space will achieve an average rental rate of \$25 per square foot while the average rental rate for the flex and distribution space will be \$12 and \$9 per square foot, respectively. The regional retail space will rent for an average of \$35 per square foot while the neighborhood retail space will rent for an average of \$25 per square foot. The regional food and beverage space will rent for an average of \$50 per square foot while the neighborhood food and beverage space will rent for an average of \$35 per square foot.
- The 50,000 square foot office building projected to be completed in 2020 will be fully occupied when it opens by a single user. The flex and distribution space as well as the regional retail and food and beverage space will also be fully occupied upon the completion of construction. The neighborhood retail space will have an average level of occupancy of 80 percent in the year it commences operating and will be fully occupied in its second year of operations. The remainder of the office space will have an average rate of occupancy in the first year of operations of 70 percent, increasing to 82.5 percent in the second year and stabilizing at 95 percent in the third year. The rental apartments will have average rate of occupancy in their first year of operations of 80 percent and will essentially be fully occupied in the second year except for short periods when turnover occurs.

It should be noted that sales tax will also be charged on at least those portions of the materials used to construct the proposed Employment Center that are purchased within the State of Florida. Miami-Dade County will collect its local option sales taxes on those portions purchased within the County. However, there is insufficient information available at this time to estimate the amounts that will be purchased in-state and/or within the County and the sales tax revenues that will be collected by either jurisdiction as a result.

Hotel Occupancy Taxes

Miami-Dade County levies a 6 percent occupancy tax on all room sales in hotels located within the County with exception of certain jurisdictions on the barrier island. The assumptions stated above in the discussion of sales taxes with respect to occupancy rates and average daily rates for the proposed hotels served as the basis for calculation hotel occupancy tax revenues.

Utility Taxes, Franchise Fees and Unified Communications Tax

Utility taxes, franchise fees and the Unified Communications Tax will be collected from the providers of water, electric, telephone and cable services to the uses proposed for development in the proposed Employment Center. The amounts that County will collect were estimated based on the factors per unit (square foot, room or apartment) shown in **Table 11-7, Revenue Factors: Utility Taxes, Franchise Fees and Unified Communication Tax**, which were compiled by Munitytics based on industry averages. The assumptions regarding occupancy rates in the preceding discussion of sales taxes were considered in estimating the revenues shown in **Table 11-1**.

**Table 11-7
Revenue Factors
Utility Taxes, Franchise Fees and Unified Communication Tax**

Use	Franchise Fees	Electric Utility Tax	Water Utility Tax	Communication Service Tax	Total
Office (SF)	\$0.0972	\$0.1648	\$0.0062	\$0.0564	\$0.3246
Flex (SF)	\$0.0583	\$0.0989	\$0.0037	\$0.0338	\$0.1947
Distribution (SF)	\$0.0312	\$0.0528	\$0.0032	\$0.0501	\$0.1373
Lodging (Room)	\$40.5375	\$73.1400	\$21.87	\$11.4514	\$146.999
Retail (SF)	\$0.0839	\$0.1422	\$0.0098	\$0.0564	\$0.2923
Apartment (Unit)	\$78.97	\$143.37	\$29.99	\$156.60	\$408.93

Water and Sewer Charges

The Miami-Dade Water & Sewer Authority will provide water and sewer services to the proposed Employment Center. The amount that will be paid will be dependent on engineering parameters regarding the number and size of meters through which service will be provided which has not yet been defined. Accordingly, it is not possible to estimate the amount of the fees that will be paid at this time.

Stormwater Fees

Miami-Dade County levies stormwater fees based on the impervious area of each parcel of land. The plans for the proposed Employment Center are not sufficiently developed at this time to be able it to determine the quantity of impervious surface that will be created as a result of the development of the proposed Employment Center. Accordingly, these fees cannot be estimated at this time.

Business Tax

Businesses operating in the unincorporated portion of Miami-Dade County are required to obtain to pay a business tax to the County at a rate that is higher than that paid by businesses that are located in an incorporated municipality. A number of factors determine the amount paid including the category of the business activity and in some instances, the size of the firm. For professional service firms, the individual licensed professionals may need to pay business taxes in addition to those paid by their firm. Given the number of variables involved, it was not possible to estimate this source of revenue with a reasonable degree of accuracy at this time.

Gasoline Tax

Each gallon of gasoline sold and used by people to travel to and from the proposed Employment Center is taxed at the State level. The State levies a tax of \$0.172 per gallon. From this amount, \$0.03 is distributed to County governments and \$0.01 to municipalities. Fuel consumption can vary greatly depending on the types of vehicle and fuel prices are currently quite volatile. Therefore, no attempt has been made to project the gasoline consumption that would be attributable to the proposed project or the resultant revenues.

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**Miami Economic
Associates, Inc.**

December 14, 2015

Mr. Jack Osterholt
Director
Department of Regulatory and Economic Resources
Miami-Dade County
Miami, Florida

**Re: Application to Amend the Miami-Dade County CDMP
Filed by The Graham Companies
November 2015 Cycle**

Dear Mr. Osterholt:

Miami Economic Associates, Inc. (MEAI) has analyzed the above-captioned application to amend the Miami-Dade County Comprehensive Development Master Plan (CDMP) in order to evaluate whether its request to re-designate approximately 339 gross acres of land in northwestern portion of Miami-Dade County from Industrial and Office to Business and Office and Employment Center use merits approval. The Application also requests that a prohibition on the development of residential units that currently applies to 280 of the 339 acres be removed. If the application is approved, the Applicant intends to develop a mixed-use project that would be comprised of a 3.0 million square foot business park with office, warehouse and flex space and several hotels together with 1.0 million square feet of retail space and 2,000 rental apartment units. It should be noted that while the application seeks to remove the Industrial and Office designation from the subject property, the Applicant has formulated a preliminary development program for the

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Mr. Jack Osterholt, Director
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Miami-Dade County
December 14, 2015
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business park that it intends to develop at the proposed Employment Center that would contain more than 2.0 million square feet of industrial and office uses in combination with several hotels.

The subject property is located between Intertstate 75 on the east and the Homestead Extension of Florida's Turnpike (HEFT) on the west. The southern boundary of the property is NW 170th Street while the northern boundary is NW 180th Street. Approximately 280 acres of the property are located west of NW 97th Avenue with remainder on the east side of that roadway. The portion of the property located west of NW 97th Avenue was, along with other parcels to the south of the NW 170th Street, the subject of Application No.5 of the April 2005 CDMP Amendment Cycle. With the adoption of that application, those 280 acres were included within the Urban Development Boundary; however, the development of residential units on them was prohibited by a Declaration of Restrictions that is recorded in the Public Records of Miami-Dade County. It is that restriction on residential use that te current Application seeks to remove.

The analysis contained in this report was undertaken in accordance with CDMP Land Use Policy 8E that states in part that applications requesting to amend the CDMP Land Use Map shall be evalutated to consider consistency with the Goals, Objectives and Policies of all Elements (of the CDMP) and other timely issues. It also enumerates other factors that should be considered including "the extent to which the proposal, if approved, would satisfy a deficiency in the Plan Map to accommodate projected population or economic growth of the County." In this regard, we also considered CDMP Land Use Policy LU-8F which states in part that "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 purpose of this letter report is to apprise you of the findings of our analysis.

Summary of Findings

MEAI believes that the subject application should be approved based on the following findings of our analysis:

- The Applicant, The Graham Companies, was founded in 1927 and has established itself as one the most respected developers in Miami-Dade with a reputation for making long-term commitments to its projects. The Graham Companies are best known as the master developer of the 3,000-acre Miami Lakes project. That project, which MEAI considers to be the premiere planned community in Miami-Dade County, was begun in the 1960's and continues in development today with a mixture of residential, office, retail, industrial and hospitality uses as well as a wide variety of recreational and civic spaces.
- According to the CDMP, designation of a property for Business and Office use provides that an "Employment Center" designation may also be applied if the property is: 1) located within the Urban Development Boundary; 2) contains a minimum of 10

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acres; and 3) has direct access to a Major Roadway, as identified on the CDMP Land Use Plan Map. The property that is the subject of the application filed on behalf of The Graham Companies clearly meets all three criteria since: 1) it has in its entirety been included in the UBD since the adoption of Application 5 of the April 2005 CDMP Amendemnt Cycle; 2) it is compised of 339 acres; and 3) it has access to a number of major roadways including NW 97th Avenue and anticipated connections to Interstate 75 and HEFT.

The Employment Center designation was established to foster good planning and the efficient use of infrastructure. As the CDMP states, “[e]mployment centers are intended to create a synergistic relationship between industries that rely on one other for the exchange of goods, ideas and services and allow for the efficient use of shared resources and infrastructure” and “to create an environment that connects industries with customers and the local workforce”. The development program that The Graham Companies have formulated for its 339 acres of property is fully consistent with this intent by proposing to integrate office and industrial, hospitality, residential and retail uses in a horizontal mixed-use project. Further, the proposed mixed use development will be compatible with: 1) the industrial and office use to the south of the subject property on the west side of NW 97th Avenue; 2) the residential use to the south of the east side of NW 97th Avenue as well as the residential uses east of Interstate 75; and 3) the retail and entertainment uses being proposed to the north by the Application filed by International Atlantic LLC in this same amendment cycle that would allow for the development of American Dream Miami.

- The creation of the Employment Center envisioned by The Graham Companies’ application will also be supportive of a number of other Goals, Objectives and Policies of the CDMP that are designed to promote good planning. Notable among these in MEAI’s opinion are the following:
 - Land Use Objective LU-1 which states in part that “the location and configuration of Miami-Dade County’s urban growth through the year 2030 shall emphasize concentration and intensification of activity, development of well-designed communities containing a variety of uses, housing typres and public services ...”
 - Land Use Policy LU-1A which states that “high intensity, well designed urban centers shall be facilitated by Miami-Dade County at locations having high countywide multimodal accessibility.”
 - Land Use Policy LU-1B which states that “major centers of activity, industrial complexes, regional shopping centers and other concentrations of significant employment shall be the structuring elements of the metropolitan area and shall be sited on the basis of metropolitan-scale considerations at locations of countywide mutltimodal accessibility.”

- Land Use Policy LU-1C which states in part that "Miami-Dade County shall give priority to in-fill development on vacant site in the currently urbanized areas ... where all necessary urban services and facilities are projected to have adequate capacity to accommodate additional demand."
- Land Use Policy LU-1T which seeks to promote bicycling and pedestrianism.

With respect to the Objective and Policies identified above, the following points are noted.

- In addition to access to several major roadways including NW 97 Avenue, Interstate 75 and HEFT, the area in which the Graham Companies' property is located is expected to be served by the proposed Palmetto Express Bus Route which will run from the intersection of Interstate 75 and NW 186 Street to the Palmetto Metrorail Station.
 - The Graham Companies' property, which is vacant, is located between active development of residential and industrial uses to the south on the east and west sides of NW 97th Avenue, respectfully, and the proposed American Dream Miami retail and entertainment project to the north that is expected to attract more than 30.0 million visitors a year and employ more 14,500 workers on the full-time equivalent (FTE) basis.
 - The mixture of uses proposed for development on The Graham Companies' property will encourage pedestrianism and with the inclusion of appropriate facilities, bicycling as well.
- MEAI recognizes that re-designation of 339 acres from Industrial and Office to Business and Office and Employment Center use will reduce the amount of vacant land designated for Industrial and Office use in Miami-Dade County overall as well as the County's Northern Planning Tier and MSA 3.1. However, even if the total 533.5 acres that comprise the The Graham Companies' property and the site of American Dream Miami are deducted from the vacant supply of land designated for industrial and Office Use during the current CDMP amendment cycle, the remaining land so-designated on a countywide basis as well as that in the County's Northern Planning Tier and in MSA 3.1 would not be depleted until after 2030, the County's current planning horizon. The paragraphs that follow discuss this point in greater detail.
 - According to data compiled by the Planning Division of the Miami-Dade County Department of Regulatory and Economic Resources in December, 2015, there are currently 3,766.8 acres of vacant land designated for Industrial and Office use in Miami-Dade County. That information further estimates that the land so-designated throughout the County is being absorbed at a rate of 158.14 acres per year, which means that the vacant acreage would not be fully depleted until approximately 2040, or ten years after the County's current planning horizon of 2030. Removal of all of the approximately 339 acres that are the subject of

the application filed by The Graham Companies from that supply would only shorten the countywide depletion period by 2.1 years, or to sometime in 2037. In fact, if the subject application and the application filed with respect to American Dream Miami site in this same cycle are both approved, MEAL estimates that sufficient supply of industrial and Office land would continue to exist countywide to last until approximately 3036, or 6 years beyond the 2030 planning horizon. It also should again be emphasized that removal of The Graham Companies' 339 from the vacant supply of land designated for Industrial and Office will not change the fact that the Companies' plans for the property still envision the development of more than 2.0 million square feet of industrial uses on it.

- The data referenced in the preceding paragraph further shows that there are a total of 1,626.7 vacant acres of land designated for Industrial and Office use in the County's Northern Planning Tier. Approximately 85 percent of them, 1,381.8 acres are in MSA 3.1, which also comprises the western sub-tier of the Northern Planning Tier. All but 5.5 of the remaining 244.9 vacant acres in the Planning Tier are located in MSA 2.4. The data compiled by the Planning Division indicates that at a total of 31.83 acres of land designated for Industrial and Office use are absorbed annually in the the Northern Planning Tier, including 16.08 acres in MSA 3.1. On this basis, the supply of vacant land designated for Industrial and Office use in the Northern Tier would not be fully depleted for more than 50 years while that in MSA 3.1 for nearly 86 acres. In both instances the depletion period would extend well beyond the County's current planning horizon in 2030. Accordingly, even if both the subject application and the one filed with respect to the America Dream Miami site are approved, resulting in the reduction of 533.5 acres from the supply of vacant land designated for Industrial and Office use, the remaining supply of land so-designated in the Northern Planning Tier and MSA 3,1 would still not be depleted until well beyond 2030.
- The Planning Division of Miami-Dade County's Department of Regulatory and Economic Resources estimates that:
 - The County has a sufficient future residential capacity to accommodate 15 years of population growth, consistent with the mandate of the CDMP; and
 - That the existing supply of vacant land designated for commercial development on a countywide basis as well as in the County's Northern Planning Tier and MSA's 3.1 will not be fully depleted until after 2030, the County's current planning horizon. It will also not be fully depleted in MSA 3.2 until after 2030.

Accordingly, MEAL recognizes the there are not deficiencies on the Plan Map with respect to either residential or commercial land that re-designation of The Graham Companies' 339 acres of property to Business and Office and Employment use would satisfy. However, based on our review of the vacant residential and commercial

parcels in the unincorporated portion of the County, we believe that the proposed re-designation of the property represents one of the best --- if not the best --- opportunities to create a mixed-use project of the type envisioned when the Employment Center designation was established with a wide range of non-residential uses all integrated with each other as well as with residential units. Accordingly, approval of the subject application would be an affirmation of the CDMP's intent to foster good planning.

- Economic Policy ECO-7A states in part that "Miami-Dade County's strategy for meeting countywide employment needs for the next several years should emphasize its strengths in international commerce, the visitors industry and aviation-related activities, and endeavor to expand in the areas of biomedical, film and entertainment, financial services, information technology and telecommunications..." MEAI believes the office and industrial space developed on the subject acreage will potentially be very attractive to companies in the sectors targeted for expansion because many of the companies in those sectors seek to locate in buildings that provide them with high degrees of exposure. The subject property with its frontage of the HEFT is one of the few properties remaining in Miami-Dade County on which such exposure to a major roadway can be achieved. MEAI has learned through the course of a number of engagements in which it has conducted interviews with realtors and economic development officials that such companies are also increasingly looking to locate in mixed-use projects that include retail and food and beverage uses, hotels and residential units rather than traditional office and industrial parks which they perceive to be sterile environments.

An engagement we performed with respect to the Arvida Park of Commerce (APOC) in Boca Raton was particularly illustrative of this point. For many years, APOC was considered one of the premiere office and industrial parks in South Florida, if not the nation, and the individual properties within it uniformly enjoyed high levels of occupancy. In recent years, however, vacancy rates have soared. While partially a function of economic conditions, the property owners within APOC have also found that their efforts to attract new tenants have been stymied by the fact that prospective tenants dislike the fact there are few places within APOC to shop and eat and there is no housing for their employees within the area. Confronted with this situation, the owners of properties within APOC, with MEAI's assistance, proposed to the City that the zoning code for APOC be amended to allow shops and restaurants as well as residential uses to be retrofit into the APOC zoning district. To date, this effort has been rebuffed and despite the fact the economy is recovering, high vacancy rates persist. The development program being proposed by The Graham Companies for its 339 acres of property is designed to address the problems that APOC is experiencing. It also reflects lessons learned at their Miami Lakes project where the office and industrial space is integrated into planned community that also includes retail, hospitality and residential uses.

- MEAI estimates that the Employment Center project that The Graham Companies envision developing would be highly beneficial to the economy of Miami-Dade County. Appendix A contains an expert from supplemental materials that were submitted with

the subject application. As evidenced, it is estimated that 9,955 people will be employed at the proposed Employment Center project on a full-time equivalent basis when development of the entirety of the project has been completed. Of that number, more than 94 percent are expected to earn more \$40,000 a year because a high proportion of the nearly 6,700 workers who will occupy the proposed office and flex space will make more than \$60,000 a year. The retail jobs will be lower paying; however, the Appendix shows that allowing retail uses to be included in the project will accelerate the pace at which its positive impact on the economy will be felt. As shown in Table 10.3.3, 1,800 of the 5,128 jobs created between 2020 and 2024, or more than a third, will be retail jobs. The rapid pace at which the proposed retail space will be developed reflects the fact that it will be located to capitalize on the traffic generated by the proposed American Dream Miami retail and entertainment project on the property immediately to the north of the proposed Employment Center.

- In addition to positively impacting the economy of Miami-Dade County, the development of American Dream Mall will be highly beneficial to the County fiscally on a non-recurring basis during the development period and on an annual recurring basis once development is completed and the project commences operations. Appendix B also contains an excerpt from supplemental materials submitted with the subject application. Tables 11.1 and 11.2 show the following:¹
 - During the period in which the proposed Employment Center is being developed, impact fees and building permit fees exceeding \$54.0 million will potentially need to be paid, including road impact fees of more than \$43.2 million.²
 - During the period the project is being developed, it will generate more than \$81.1 million in ad valorem taxes for the various funds of Miami-Dade County including \$38.8 million for its General Fund, \$20.1 million for its Fire Fund and \$16.0 million for its UMSA Fund. In 2032, which is the first year that all elements are expected to be on the tax roll, the ad valorem taxes collected by Miami-Dade County for its various funds will approximate \$9.9 million. Of that number, \$4.7 million will be credited to the General Fund, \$2.45 million to the Fire Fund and nearly \$2.0 million to the UMSA Fund.
 - The County will also collect significant amounts of non-ad valorem revenues including, most notably, local option sales taxes and hotel occupancy taxes. In 2032 and thereafter, these two revenues sources will account for nearly \$11.0 million in annual revenues.
 - The Miami-Dade Public School District will also be a major beneficiary of the proposed Employment Center project, collecting more than \$7.5 million in ad valorem taxes for its Operating Fund in 2032 and annually each year thereafter.

¹ All monetary amounts in 2015 Dollars.

² The actual amount of the impact fees will be partially dependent on the extent to which The Graham Companies receive credits for directly funding off-site improvements.

Mr. Jack Osterholt, Director
Department of Regulatory and Economic Resources
Miami-Dade County
December 14, 2015
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Closing

MEAI believes that the application filed on by the Graham Companies should be approved. Doing so will affirm the County's commitment to good planning while being highly beneficial to it both economically and fiscally.

Sincerely,
Miami Economic Associates, Inc.



Andrew Dolkart
President

Appendix A

PART 3 DEMOGRAPHIC AND EMPLOYMENT INFORMATION

A. Complete the following Demographic and Employment Information tables.

Table 10-3A, Project Population, provides demographic information with respect to the households that will reside in the 2,000 rental apartment units at the Employment Center project that The Graham Companies are proposing to develop in northwestern Miami-Dade County.

TABLE 10-3A Project Population					
Phase	Total Dwelling Units **	Persons Per HH ***	Total Persons	Total School Age Children ****	Total Elderly
Total	2,000	2.71	5,420	671	N/A
<p><i>** Rental apartments units</i> <i>*** Based from the 2013 ACS 5-Year Estimate compiled by Planning Division of Miami-Dade County Department of Regulatory and Economic Resources.</i> <i>**** Estimate provided by Mr. Ivan Rodriquez of the Miami-Dade Public School District.</i> <i>***** It is anticipated that the overwhelming predominance of the residents will be in households in which one member will be employed at the Employment Center itself, American Dream Miami to the north or the Beacon Countyline industry project to the south.</i></p>					

Source: The Graham Companies; American Community Survey 2013 Five-Year Estimates; Planning Division, Miami-Dade County Department of Regulatory and Economic Resources, Miami-Dade Public School District; Miami Economic Associates, Inc.

With respect to the information presented above, the following points are noted:

- As shown in response to Question 24, it is expected 1,600 of the 2,000 proposed rental apartment units will be either 1-bedroom or 2-bedroom units. On that basis, it is likely that estimate of persons per household shown above is high and the on-site population when all the units are constructed will be lower.
- The Miami-Dade Public School District estimated that he 671 students would include 291 elementary, 187 middle and 193 high school students. The District also indicated that sufficient capacity currently exists at all three levels to accommodate these students.
- It is anticipated that the overwhelming preponderance of the resident will be in households in which at least one member will be employed at the proposed Employment Center itself, American Dream Miami to the north or the Beacon Countyline industrial project to the south. Given that and mix of units be number of bedrooms, it is unlikely that a significant number of elderly people will live in the proposed rental apartment units.

Table 10-3B, Estimated Employment by Income Range, provides information on the estimated employment at the project both during the period in which it is being developed and on a permanent basis after construction is completed. For the purpose of this table, construction employment is expressed in terms of the total number of worker-years of employment that will required to complete the proposed project during the entirety of the period from 2017 to 2031 when site preparation and construction is on-going. The estimate of permanent employment represents the number of workers that will be employed on-site annually when the project has been fully developed. However, it is likely that more people will work on-site annually than the number of FTE’s shown because part-time

workers comprise significant percentages of the people employed in the retail, food and beverage and hospitality industry sectors. The table further assumes that all the construction workers as well as all the FTE's employed on a permanent basis annually will earn wages and salaries at or above minimum wage which currently equates to \$16,744 in the State of Florida for workers who record 40 hours a week for 52 weeks a year.

Type of Employment	\$16,744 – \$19,999**	\$20,000 – \$24,999	\$25,000 – \$29,999	\$30,000 – \$34,999	\$35,000 – \$39,999	\$40,000 or more	Total
Construction***	59	39	68	157	196	8,523	9,043
Permanent****	833	580	749	649	236	6,908	9,955

** \$16,744 equates to the annual earnings of minimum wage worker in Florida who works 40 hours a week for 52 weeks.

*** Total worker-years over the entirety of the period from 2017 to 2031 in which construction of the project occurs.

**** Full-time equivalents on an annual basis.

Source: International Atlantic, LLC; Annual Census of Employment and Wages for Miami-Dade County, 2014; Miami Economic Associates, Inc.

The above estimate of worker-years of construction employment assumes the following:

- As discussed in the response to Question 10, Part 1F, it is estimated that \$15.0 million of the \$100.0 million spent for site preparation will be spent on wages and salaries. For the purpose of this analysis, it was assumed that the workers involved in the activity would be in NAICS Code 237 and would make an average \$57,001 annually. That figure is based on the Annual Survey of Employment and Wages compiled by the State of Florida Department of Economic Opportunity for Miami-Dade County for 2014, which is most recent such data available. The expenditure of \$15.0 million would support a total of 263 workers at their annual average rate of earnings.
- As discussed in response to Question 10, Part 1F, it is estimated that \$1.142.2 billion will be spent to construct the various uses at the proposed Employment Center in terms of hard costs. Of this amount, \$292.0 million will be spent on rental apartments and the \$850.2 million on the non-residential uses. For the purpose of this analysis, it was assumed that the workers who construct the apartments will be in NAICS Code 2361 and will make an average of \$60,311 annually while the workers who will construct the non-residential uses will be in NAICS Code 2362 and will make an average of \$62,545 annually. On this basis and assuming that labor costs represent 45 percent of total hard cost, the money spent to build the apartments would support 2,163 workers at their annual average rate of earnings while the money spent to build the non-residential uses would support 6,117 workers.

The above estimate of the number of FTE's that will be employed at the proposed Employment when development of the entirety of the project is completed is based on the following assumptions:

- The office space will be generally occupied at a ratio of 4 workers per 1,000 square feet consistent with the industry average; however, 50,000 square feet will be used as an outpatient care center and have a staff of 100 workers.
- The distribution space will be occupied at a ratio of 1.25 workers per 1,000 square feet consistent with the industry average.
- The flex space, which will basically serve as an office use, will be occupied at a ratio of 3 employees per 1,000 square feet reflecting the fact that approximately 70 percent of the total space will be used in that manner while the remainder will be used for storage.
- All of the retail and food and beverage space in both the neighborhood and regional facilities will have a ratio of 2 employees per 1,000 square feet reflecting the presence of supermarket, a major pharmacy and big box retailers in the tenant mix.
- The limited service hotels will have a ratio of 0.35 workers per room while the full service hotels will have a ratio of 0.75 workers per room consistent with industry averages.
- There will be additional workers on the site who will be involved in property management, leasing and promotion as well as maintenance, janitorial, security and parking operations. A staffing schedule for this portion of the on-site workforce has not yet been determined.

Table 10-3C, Distribution of Employees by NAICS Code, shows the distribution of the on-site 9,955 workers reflected in the preceding table by NAICS Code. It also shows their average wage level based in the Annual Census of Employment and Wages for Miami-Dade County for 2014. Finally, it shows the build-up of the workforce during the development period based on the construction schedule provided in response to Question 10, Part 1F. The table also takes into account assumption regarding the pace at which absorption occurs that are present in Question 11 with respect to manner in which sales tax revenues were calculated.

Table 10-3C
Distribution of Employees By NAICS Code

Industry Sector	NAICS Code	Average Earnings	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
Office																	
Publishing	511	\$65,454	0	0	18	8	18	8	18	8	18	9	19	9	17	8	158
Telecommunications	517	\$74,205	0	0	94	40	94	40	94	40	94	40	98	42	90	39	805
Data Processing	518	\$78,005	0	0	47	20	47	20	47	20	47	20	49	21	45	19	402
Other Information Services	519	\$83,293	0	0	18	8	18	8	18	8	18	8	19	8	17	7	155
Credit Intermediation	522	\$79,248	0	0	50	0	50	0	50	0	50	0	0	0	0	0	200
Insurance	524	\$70,398	0	0	118	50	118	50	118	50	118	50	123	51	113	47	1,006
Real Estate	531	\$50,506	0	0	117	50	117	50	117	50	117	50	122	51	114	47	1,002
Rental & Leasing Services	532	\$45,995	0	0	22	8	22	8	22	8	22	8	23	9	20	8	180
Professional & Technical Services	541	\$78,392	0	0	94	40	94	40	94	40	94	40	98	42	90	39	805
Management of Companies & Enterprises	551	\$117,922	0	0	94	40	94	40	94	40	94	40	98	42	90	39	805
Office Administrative Services	5611	\$69,559	0	0	47	20	47	20	47	20	47	20	49	21	45	19	402
Outpatient Care Centers	6214	\$50,463	0	100	0	0	0	0	0	0	0	0	0	0	0	0	100
Distribution																	
Merchant Wholesalers, Non-Durable Goods	424	\$58,852	125	0	125	0	125	0	0	0	0	0	0	0	0	0	375
Flex																	
Architecture & Engineering	5413	\$65,910	37	0	56	0	57	0	0	0	0	0	0	0	0	0	150
Scientific Research & Development Services	5417	\$69,586	38	0	56	0	56	0	0	0	0	0	0	0	0	0	150
Other Professional & Technical Services	5419	\$46,851	38	0	56	0	56	0	0	0	0	0	0	0	0	0	150

**Table 10-3C
Distribution of Employees By NAICS Code**

Industry Sector	NAICS Code	Average Earnings	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
Activities related to Real Estate	5313	\$49,596	37	0	57	0	56	0	0	0	0	0	0	0	0	0	150
Hotels																	
Traveler Accommodation	7211	\$32,775	0	0	105	375	105	0	0	375	0	0	0	0	0	0	960
Subtotal			275	100	1,174	659	1,174	284	719	659	719	285	698	296	641	272	7,955
Retail																	
Home Furnishings	4421	\$27,708	0	0	200	0	0	0	0	0	0	0	0	0	0	0	200
Electronics & Appliances	443	\$40,457	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
Building Materials & Garden Supplies	444	\$32,604	0	400	0	0	0	0	0	0	0	0	0	0	0	0	400
Grocery Stores	4451	\$21,938	0	94	0	0	0	0	0	0	0	0	0	0	0	0	94
Specialty Food	4452	\$24,025	0	8	0	0	0	0	0	0	0	0	0	0	0	0	8
Beer, Wine & Liquor	4453	\$23,222	0	8	0	0	0	0	0	0	0	0	0	0	0	0	8
Health & Personal Care	446	\$33,550	0	44	0	0	0	0	0	0	0	0	0	0	0	0	44
Clothing Stores	448	\$23,555	0	0	150	100	0	0	0	0	0	0	0	0	0	0	250
General Merchandise	452	\$22,760	0	300	0	0	0	0	0	0	0	0	0	0	0	0	300
Florist	4531	\$36,198	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
Office Supplies, Stationery & Gifts	4532	\$28,632	0	0	0	150	0	0	0	0	0	0	0	0	0	0	150
Credit Intermediation	522	\$79,248	0	16	0	0	0	0	0	0	0	0	0	0	0	0	16
Food Services & Drinking Places	722	\$21,561	0	150	50	50	50	0	50	0	50	0	50	0	50	0	500
Personal Services	812	\$23,642	0	18	0	0	0	0	0	0	0	0	0	0	0	0	18
Subtotal			0	1,050	400	300	50	0	50	0	50	0	50	0	50	0	2,000
Total			275	1,150	1,574	959	1,224	284	769	659	769	285	748	296	691	272	9,955

Source: The Graham Companies; Annual Census of Employment and Wages for Miami-Dade County, 2014; Miami Economic Associates, Inc.

Appendix B

Question 11 – Revenue Generation Summary

1. Project the funds anticipated to be generated by the project. This projection should include any source or use of funds which could have any reasonable connection to the proposed development
 1. Make the following projections by year, including the first and last year in which any construction and/or development takes place:
 - (a) Yearly ad valorem tax receipts
 - (b) Yearly impact fees collected
 - (c) Yearly sales tax received by local government
 - (d) Yearly gasoline tax received by local government
 - (e) Yearly projections of any other funds by any other sources generated as a result of development of the proposed project within the region

Table 11-1, Revenue Generation – Miami-Dade County, estimates, to the extent possible based on the information currently available, the non-recurring and recurring revenues that The Graham Companies' proposed Employment Center project in northwestern Miami-Dade County will generate for Miami-Dade County. **Table 11-2, Revenue Generation – Other Governmental Jurisdictions**, estimates, to the extent possible based on information currently available, the non-recurring and recurring revenues that will be generated for other governmental jurisdictions in which the proposed project will be located, including the following:

- Miami-Dade County Public Schools
- Children's Trust
- South Florida Water Management District
- Everglades Project
- Okeechobee Basin
- Florida inland Navigation District
- State of Florida.

Table 11-1 Revenue Generation – Miami-Dade County Proposed Employment Center Project (000's of 2015 Dollars)																	
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Total
Non-Recurring																	
Impact Fees **																	
Roads	0.0	1,355.9	5,466.6	7,765.2	6,176.0	3,731.2	1,835.8	3,723.7	3,599.1	3,723.7	1,355.9	2,367.9	0.0	2,201.2	0.0	0.0	43,302.1
Fire	0.0	102.9	500.1	332.2	378.0	269.1	260.8	195.7	154.1	195.7	102.9	92.8	0.0	86.2	0.0	0.0	2,670.8
Police	0.0	134.3	404.6	352.4	251.6	302.8	199.6	236.8	130.5	236.8	134.3	102.52	0.0	95.1	0.0	0.0	2,581.4
Parks	0.0	561.5	561.5	561.5	0.0	561.5	561.5	561.5	0.0	561.5	561.5	0.0	0.0	0.0	0.0	0.0	4,492.3
Building Permits																	
General	0.0	34.6	120.1	103.561	79.5	82.9	55.3	67.0	41.2	67.0	34.6	32.4	0.0	27.1	0.0	0.0	745.4
Trade-related	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Total Non-Recurring	0.0	2,189.3	7,053.0	9,114.9	6,885.1	4,947.7	2,912.9	4,784.8	3,924.9	4,784.8	2,189.3	2,595.6	0.0	2,409.6	0.0	0.0	53,791.9
Recurring																	
Ad valorem Taxes																	
General Fund	0.0	0.0	0.0	219.3	748.6	1,464.1	2,025.3	2,630.2	2,793.5	3,205.9	3,672.6	4,085.0	4,248.3	4,497.4	4,497.4	4,727.9	38,815.5
Debt Service	0.0	0.0	0.0	21.1	72.2	141.1	195.2	253.6	269.3	309.0	354.0	393.8	409.5	433.5	433.5	455.8	3,741.8
Fire Fund	0.0	0.0	0.0	113.8	388.3	759.4	1,050.5	1,364.3	1,449.0	1,662.9	1,905.0	2,118.9	2,203.6	2,332.8	2,332.8	2,452.4	20,133.6
Fire Debt Service Fund	0.0	0.0	0.0	0.4	1.3	2.6	3.6	4.7	5.0	5.8	6.6	7.4	7.6	8.1	8.1	8.5	69.9
Library Fund	0.0	0.0	0.0	13.4	45.6	89.2	123.3	160.2	170.1	195.2	223.7	248.8	258.7	273.9	273.9	287.9	2,363.9
UMSA Fund	0.0	0.0	0.0	90.6	309.3	605.0	836.9	1,086.8	1,154.3	1,324.7	1,517.5	1,687.9	1,755.4	1,858.3	1,858.3	1,953.6	16,038.6
Total Ad valorem Taxes	0.0	0.0	0.0	458.6	1,565.3	3,061.4	4,234.9	5,499.7	5,841.2	6,703.5	7,679.4	8,541.7	8,883.2	9,404.1	9,404.1	9,886.0	81,163.3
Non-Ad Valorem Revenues																	
State Sales Tax	0.0	0.0	0.0	38.3	921.2	1,294.2	1,529.4	1,674.4	1,889.3	1,981.5	1,997.6	2,025.5	2,098.5	2,165.9	2,169.0	2,211.6	21,996.4
Local Option Sales Taxes	0.0	0.0	0.0	94.6	2,274.8	3,195.5	3,775.9	3,134.4	4,664.8	4,892.6	4,932.3	5,124.7	5,181.4	5,347.8	5,355.6	5,460.6	53,435.0
Hotel Occupancy Tax	0.0	0.0	0.0	0.0	0.0	682.8	2,494.6	3,313.9	3,450.3	3,484.8	5,258.7	5,357.3	5,455.8	5,455.8	5,455.8	5,455.8	45,865.5
Water & Sewer User Charges	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Stormwater Fees	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Franchise Fees/ Utility Taxes	0.0	0.0	0.0	105.3	369.8	654.7	783.8	1,004.6	1,121.7	1,299.9	1,383.4	1,460.5	1,555.5	1,731.9	1,762.5	1,832.2	15,065.8
Business Tax	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Gasoline Tax	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Total Non-Ad valorem Revenues	0.0	0.0	0.0	238.2	3,565.8	5,827.2	8,583.7	9,127.3	11,126.1	11,658.8	13,572.0	13,968.0	14,291.2	14,701.4	14,742.9	14,960.2	136,362.7
Total Recurring	0.0	0.0	0.0	696.8	5,131.1	8,888.6	12,818.6	14,627.0	16,967.4	18,362.3	21,251.4	22,509.7	23,174.4	24,105.5	24,147.0	24,846.2	217,526.1

* Cannot be estimated at this time based on the information currently available
 ** The actual amounts paid in impact fees will be dependent on the extent to which The Graham Companies receive credits for infrastructure improvements that are directly funded.
 Source: The Graham Companies; Miami-Dade County; Miami-Dade County Property Appraiser; Munitities; Miami Economic Associates, Inc.

Table 11-2
Revenue Generation – Other Governmental Jurisdictions

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Total	
Miami-Dade County Public Schools																		
Non-Recurring																		
School Impact Fee	0.0	382.5	382.5	382.5	0.0	382.5	382.5	382.5	0.0	382.5	382.5	0.0	0.0	0.0	0.0	0.0	0.0	3,060.0
Recurring																		
Ad Valorem																		
General Fund	0.0	0.0	0.0	348.4	1,189.08	2,325.6	3,217.0	4,177.8	4,437.20	5,092.3	5,833.6	6,488.6	6,748.0	7,143.7	7,143.7	7,509.8	7,509.8	61,654.6
Debt Service	0.0	0.0	0.0	9.3	31.9	62.4	86.3	112.0	119.0	136.6	156.5	174.0	181.0	191.6	191.6	201.4	201.4	1,653.5
Total Ad Valorem Taxes	0.0	0.0	0.0	357.8	1,221.0	2,387.9	3,303.3	4,289.9	4,556.2	5,228.8	5,990.0	6,662.6	6,929.0	7,335.3	7,335.3	7,711.2	7,711.2	63,308.2
Children's Trust																		
Ad Valorem Taxes	0.0	0.0	0.0	23.5	80.2	156.8	216.9	281.7	299.2	343.4	393.3	437.5	455.0	481.7	481.7	506.4	506.4	4,157.1
South Florida Water Management																		
Ad Valorem Taxes	0.0	0.0	0.0	6.8	23.4	45.7	63.2	82.1	87.2	100.0	114.6	127.5	132.5	140.3	140.3	147.5	147.5	1,211.0
Everglades Construction Project																		
Ad Valorem Taxes	0.0	0.0	0.0	2.4	8.1	15.8	21.9	28.4	30.2	34.6	39.7	44.1	45.9	48.6	48.6	51.1	51.1	419.2
Okeechobee Basin																		
Ad Valorem Taxes	0.0	0.0	0.0	7.5	25.5	49.8	68.9	89.4	95.0	109.0	124.9	138.9	144.4	152.9	152.9	160.7	160.7	1,319.7
Florida Inland Navigation District																		
Ad Valorem Taxes	0.0	0.0	0.0	1.5	5.2	10.1	14.0	18.1	19.3	22.1	25.3	28.2	29.3	31.0	31.0	32.6	32.6	267.8
State of Florida																		
Non-recurring																		
Sales Tax	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Recurring																		
Sales Tax	0.0	0.0	0.0	516.6	12,420.2	17,447.3	20,616.2	22,573.9	25,469.9	26,713.8	27,630.1	27,980.7	28,290.6	29,198.9	29,241.5	29,815.0	29,815.0	297,914.7

* Cannot be estimated at this time based on the information currently available

Source: The Graham Companies; Miami-Dade County; Miami-Dade County Property Appraiser; Muniytics; Miami Economic Associates, Inc.

2. List all assumptions used to derive the above projections and estimates, show the methodologies used and describe the generally accepted accounting principles used in all assumptions, estimates and projections.

The materials that follow provide the bases used in formulating the revenue estimates provided in Tables 11-1 and 11-2, preceding.

Project Description

For the purpose of this analysis, an illustrative development program has been formulated for the proposed Employment Center project. However, it should be remembered that the market will dictate how the project ultimately gets developed over the course of the next 15 years and what is actually built may differ from the program used in this analysis. Further, the tax rates and fee schedules used in this analysis will likely change over time while market considerations the rental rates and other revenues assumed in this analysis. Accordingly, the revenues that the various governmental jurisdictions actually collect between 2017 and 2032 may differ from those projected and the variances could be significant.

According to the illustrative development formulated for the Employment Center for the purpose of this analysis, the proposed project will be comprised of a mixture of uses as follows:

- Business Park
 - 1.53 million square feet of office space
 - 200,000 square feet of flex space
 - 300,000 square feet of distribution space
 - 2 limited service hotels with 300 rooms each
 - 2 full service hotels with 500 rooms each
- Retail/Food and Beverage
 - 125,000 neighborhood shopping center
 - 875,000 square feet of regional retail
- Residential
 - 2,000 rental apartments

Table 11-3, Date of Beginning of Construction, shows the construction schedule assumed in this analysis for the uses enumerated above while **Table 11-4, Year Construction Completed**, shows the anticipated date when construction would be completed. For the purpose of this analysis, it is assumed that all construction will commence on January 2 of the year shown. It was also assumed that all property would be placed on the tax rolls on January 1st of the year following the completion of construction.

**Table 11-3
Date of Beginning of Construction***

Year	Office (SF)	Flex (SF)	Distribution (SF)	Limited Service Hotel (Rooms)	Full Service Hotel (Rooms)	Neighborhood Retail (SF)	Regional Retail (SF)	Rental Apartments (Units)
2017	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	250
2019	50,000	50,000	100,000	0	0	125,000	400,000	250
2020	250,000	0	0	300	0	0	200,000	250
2021	0	75,000	100,000	0	500	0	150,000	0
2022	250,000	0	0	300	0	0	25,000	250
2023	0	75,000	100,000	0	0	0	0	250
2024	250,000	0	0	0	0	0	25,000	250
2025	0	0	0	0	500	0	0	0
2026	250,000	0	0	0	0	0	25,000	250
2027	0	0	0	0	0	0	0	250
2028	250,000	0	0	0	0	0	25,000	0
2029	0	0	0	0	0	0	0	0
2030	230,000	0	0	0	0	0	25,000	0
Total	1,530,000	200,000	300,000	600	1,000	125,000	875,000	2,000

* Construction assumed to commence on January 2 of year shown.
Source: The Graham Companies; Miami Economic Associates, Inc.

Year	Office (SF)	Flex (SF)	Distribution (SF)	Limited Service Hotel (Rooms)	Full Service Hotel (Rooms)	Neighborhood Retail (SF)	Regional Retail (SF)	Rental Apartments (Units)
2017	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0
2019	0	50,000	100,000	0	0	0	0	250
2020	50,000	0	0	0	0	125,000	400,000	250
2021	250,000	75,000	100,000	300	0	0	200,000	250
2022	0	0	0	0	500	0	150,000	0
2023	250,000	75,000	100,000	300	0	0	25,000	250
2024	0	0	0	0	0	0	0	250
2025	250,000	0	0	0	0	0	25,000	250
2026	0	0	0	0	500	0	0	0
2027	250,000	0	0	0	0	0	25,000	250
2028	0	0	0	0	0	0	0	250
2029	250,000	0	0	0	0	0	25,000	0
2030	0	0	0	0	0	0	0	0
2031	230,000	0	0	0	0	0	25,000	0
Total	1,530,000	200,000	300,000	600	1,000	125,000	875,000	2,000

* Assumes construction completed on December 31 of the year shown.
Source: The Graham Companies; Miami Economic Associates, Inc.

Table 11-5, Taxable Value by Use, shows the taxable values assumed in this analysis for the various uses that assumed in the illustrative development plan. In estimating the taxable values shown consideration was given both to data obtained on the Miami-Dade County Property Appraiser’s website with respect to comparable properties as well as the estimated hard cost to construct each use.

Table 11-5 Taxable Value by Use	
Use	Taxable Value
Business Park	
Office	\$200/SF
Flex	\$90/SF
Distribution	\$75/SF
Limited Service Hotel	\$90,000/room
Full Service Hotel	\$200,000/room
Retail	
Neighborhood Retail	\$115/SF
Regional Retail	\$135/SF
Residential	
Rental Apartments	\$140,000/Unit

Source: The Graham Companies; Miami-Dade County Property Appraiser; Miami Economic Associates, Inc.

NON-RECURRING REVENUES

During the period during which the proposed Employment Center project will be developed, a variety of fees will be paid on a one-time, or non-recurring, basis. The bases for calculating these non-recurring revenues are discussed below. All monetary amounts are in 2015 Dollars.

Impact Fees

Miami-Dade County

Miami-Dade County levies impact fees for roads, police and fire on all the uses assumed in the illustrative development program for the proposed Employment Center project. Park impact fees are also levied on residential uses. In conducting this analysis, the impact fee schedule posted on the County's website as of December 10, 2015 and the construction schedule presented in **Table 11-3** served as the bases for the calculations made. For road impact fees, the rates applied were those shown on the fee schedule for development not located in the Urban In-fill Area. For park impact fees, the District 1 rates were applied.

Miami-Dade County Public School District

The Miami-Dade Public School District receives impact fees on all new residential units. In conducting this analysis, the impact fee schedule posted on the County's website as of December 10, 2015 and the construction schedule presented in **Table 11-3** served as the bases for the calculations made. For the purpose of this analysis, it was assumed that the proposed rental apartment units would average 1,000 square feet in terms of air conditioned space.

Building Permit Fees

Miami-Dade County calculates general building permit fees on non-residential properties as well as multi-family residential projects based on the gross square footage within the proposed structure. For proposed rental apartment units, a building efficiency factor of 85 percent was assumed with the result that the

average unit for the purpose of calculating building permits was considered to be 1,176.5 gross square feet. The building permit fee schedule posted on the County's website as of December 10, 2015 and the construction schedule presented in **Table 11-3** served as the bases for the calculations made. The County also collects fees from the various trades involved in the construction. At this point, plans for the proposed Employment Center project are not sufficiently detailed to calculate these trade-related building permits with specificity.

Water and Sewer Connection Fees

The Miami-Dade County Water and Sewer Authority will charge fees to connect the proposed Employment Center project to its water and sewer systems. The amount of the fees paid will depend on engineering parameters regarding the number and size of meters that have not presently been defined. Accordingly, it is not possible to estimate the amount of the fees that will be paid at this time.

RECURRING REVENUES

Miami-Dade County and the various governmental entities identified in **Table 11-2** will receive recurring revenues annually as a result of the development of the proposed Employment Center. The bases for the recurring revenues projected in **Tables 11.1** and **11.2** are discussed below. All monetary amounts are in 2015 Dollars.

Ad Valorem Taxes

Ad valorem taxes will be paid on the real property in the proposed Employment Center, inclusive of land and buildings, as well as on the personal property contained within the non-residential facilities. The figures shown in **Tables 11-1** and **11-2** include only the amounts that would be paid on real property because there is no basis for estimating within the precision the value of the taxable personal property.

As discussed previously, this analysis assumes that the uses developed in the proposed Employment Center will be placed on the tax rolls on January 1st in the year after the date on which construction is completed, as shown on **Table 11-4**. The ad valorem figures shown in **Tables 11-1** and **11-2** were calculated based on the information contained in **Table 11-5** with respect to taxable values and the millage rates shown in **Table 11-6, Applicable Millage Rates by Jurisdiction**, below.

**Table 11-6
Applicable Millage Rates by Jurisdiction**

Jurisdiction	Millage Rate/ \$1,000 Taxable Value
Miami-Dade County	
General Fund	\$4.6669
Debt Service Fund	\$0.4500
Fire Fund	\$2.4207
Fire Debt Service Fund	\$0.0086
Library Fund	\$0.2840
UMSA Fund	\$1.9283
Miami-Dade Public School District	
Operating Fund	\$7.4130
Debt Service Fund	\$0.1990
Children's Trust	\$0.5000
South Florida Water Management District	\$0.1459
Everglades Construction Project	\$0.0506
Okeechobee Basin	\$0.1586
Florida Inland Navigational District	\$0.0320

Sales Tax

The State of Florida imposes a 6 percent sales tax on certain transactions including retail sales, food and beverage sales in eating and drinking establishments, hotel room charges and rent payments. Approximately 9 percent of the collected amounts are rebated to the counties in which the revenues are collected, with the rebated amounts further distributed divided between the County and to the municipalities within the county, which for this purpose include Unincorporated Municipal Service Area. The County's share of the rebated amount approximates 75 percent.

Miami-Dade County charges an additional one cent in local option sales taxes, the proceeds of which are split evenly between Transit and the Health Trust. For the purpose of this analysis, a number of other assumptions were made, which are as follows:

- A quarter of both the neighborhood and regional retail space will be occupied by food and beverage establishments.
- The neighborhood retail and food and beverage space will achieve average sales volumes of \$250 per square foot while the regional food and beverage space would achieve average sales volumes of \$350 per square foot. It was further assumed that 50 percent of the sales in the neighborhood retail facility and 10 percent of the sales in the regional retail facilities will be exempt from sales tax.
- All of the proposed hotels will achieve occupancy rates of 72 percent in their first year of operation, with occupancy increasing to 76 percent in the second year operations and then stabilizing at 80 percent beginning in the third year. An average daily rate of \$145 per night will be achieved in the limited service hotels while the full service hotels are expected to achieve an average daily rate of \$225 per night. Finally, the revenues collected for rental of rooms in the limited service hotels will account for 80 percent of total revenues and 65 percent of total revenues in the full service hotels.

- The proposed office space will achieve an average rental rate of \$25 per square foot while the average rental rate for the flex and distribution space will be \$12 and \$9 per square foot, respectively. The regional retail space will rent for an average of \$35 per square foot while the neighborhood retail space will rent for an average of \$25 per square foot. The regional food and beverage space will rent for an average of \$50 per square foot while the neighborhood food and beverage space will rent for an average of \$35 per square foot.
- The 50,000 square foot office building projected to be completed in 2020 will be fully occupied when it opens by a single user. The flex and distribution space as well as the regional retail and food and beverage space will also be fully occupied upon the completion of construction. The neighborhood retail space will have an average level of occupancy of 80 percent in the year it commences operating and will be fully occupied in its second year of operations. The remainder of the office space will have an average rate of occupancy in the first year of operations of 70 percent, increasing to 82.5 percent in the second year and stabilizing at 95 percent in the third year. The rental apartments will have average rate of occupancy in their first year of operations of 80 percent and will essentially be fully occupied in the second year except for short periods when turnover occurs.

It should be noted that sales tax will also be charged on at least those portions of the materials used to construct the proposed Employment Center that are purchased within the State of Florida. Miami-Dade County will collect its local option sales taxes on those portions purchased within the County. However, there is insufficient information available at this time to estimate the amounts that will be purchased in-state and/or within the County and the sales tax revenues that will be collected by either jurisdiction as a result.

Hotel Occupancy Taxes

Miami-Dade County levies a 6 percent occupancy tax on all room sales in hotels located within the County with exception of certain jurisdictions on the barrier island. The assumptions stated above in the discussion of sales taxes with respect to occupancy rates and average daily rates for the proposed hotels served as the basis for calculation hotel occupancy tax revenues.

Utility Taxes, Franchise Fees and Unified Communications Tax

Utility taxes, franchise fees and the Unified Communications Tax will be collected from the providers of water, electric, telephone and cable services to the uses proposed for development in the proposed Employment Center. The amounts that County will collect were estimated based on the factors per unit (square foot, room or apartment) shown in **Table 11-7, Revenue Factors: Utility Taxes, Franchise Fees and Unified Communication Tax**, which were compiled by Munilytics based on industry averages. The assumptions regarding occupancy rates in the preceding discussion of sales taxes were considered in estimating the revenues shown in **Table 11-1**.

Table 11-7					
Revenue Factors					
Utility Taxes, Franchise Fees and Unified Communication Tax					
Use	Franchise Fees	Electric Utility Tax	Water Utility Tax	Communication Service Tax	Total
Office (SF)	\$0.0972	\$0.1648	\$0.0062	\$0.0564	\$0.3246
Flex (SF)	\$0.0583	\$0.0989	\$0.0037	\$0.0338	\$0.1947
Distribution (SF)	\$0.0312	\$0.0528	\$0.0032	\$0.0501	\$0.1373
Lodging (Room)	\$40.5375	\$73.1400	\$21.87	\$11.4514	\$146.999
Retail (SF)	\$0.0839	\$0.1422	\$0.0098	\$0.0564	\$0.2923
Apartment (Unit)	\$78.97	\$143.37	\$29.99	\$156.60	\$408.93

Water and Sewer Charges

The Miami-Dade Water & Sewer Authority will provide water and sewer services to the proposed Employment Center. The amount that will be paid will be dependent on engineering parameters regarding the number and size of meters through which service will be provided which has not yet been defined. Accordingly, it is not possible to estimate the amount of the fees that will be paid at this time.

Stormwater Fees

Miami-Dade County levies stormwater fees based on the impervious area of each parcel of land. The plans for the proposed Employment Center are not sufficiently developed at this time to be able it to determine the quantity of impervious surface that will be created as a result of the development of the proposed Employment Center. Accordingly, these fees cannot be estimated at this time.

Business Tax

Businesses operating in the unincorporated portion of Miami-Dade County are required to obtain to pay a business tax to the County at a rate that is higher than that paid by businesses that are located in an incorporated municipality. A number of factors determine the amount paid including the category of the business activity and in some instances, the size of the firm. For professional service firms, the individual licensed professionals may need to pay business taxes in addition to those paid by their firm. Given the number of variables involved, it was not possible to estimate this source of revenue with a reasonable degree of accuracy at this time.

Gasoline Tax

Each gallon of gasoline sold and used by people to travel to and from the proposed Employment Center is taxed at the State level. The State levies a tax of \$0.172 per gallon. From this amount, \$0.03 is distributed to County governments and \$0.01 to municipalities. Fuel consumption can vary greatly depending on the types of vehicle and fuel prices are currently quite volatile. Therefore, no attempt has been made to project the gasoline consumption that would be attributable to the proposed project or the resultant revenues.

Question 12

Vegetation & Wildlife

- A. Identify the dominant species and other unusual or unique features of the plant communities on Map F. Identify and describe the amount of all plant communities that will be preserved in a natural state following development as shown on Map H.**

Using the Florida Land Use and Cover Classification System (FLUCCS) to describe the cover types, the Project Site predominately consists of dog fennel and low marsh grasses - FLUCCS Code #6415. It also consists of significant areas of invasive exotic plant species including Brazilian pepper (#422) and melaleuca (#424) identified by the Florida Exotic Pest Plan Council (FEPPC) as Category I plants. In EPPC's 2015 List of Invasive Plant Species these are defined as "Invasive exotics that are altering native plant communities by displacing native species, changing community structures or ecological functions, or hybridizing with natives. This definition does not rely on the economic severity or geographic range of the problem, but on the documented ecological damage caused."

Because there are wetlands on the site which may be subject to multiple regulatory agency jurisdictions, a final on-site mitigation/preservation plan has not yet been reviewed and approved. Presently there are no high quality wetlands or undisturbed natural habitats on the site which would necessitate preservation. The extent of wetlands has not been determined by Federal or State agencies, but due to the type of vegetation coverage and the extent of hydric soils, it is anticipated that a large portion of the site will contain both Chapter 62-340 FAC and Section 404 CWA jurisdictional wetlands.

- B. Discuss the survey methods were used to determine the absence or presence of state or federally listed wildlife and plants. (Sampling methodology should be agreed to by the regional planning council and other reviewing agencies at pre-application conference stage.) State actual sampling times and dates, and discuss any factors that may have influenced the results of the sampling effort. Show on Map G the location of all transects, trap grids, or other sampling stations used to determine the on-site status of state or federally listed wildlife and plant resources.**

Due to the large area of relatively consistent flat topography, review of recent aerial photography and appropriate literature combined with an on-site inspection on November 17, 2015 was conducted to determine the presence or absence of listed species.

Species observed included eastern meadowlark, white ibis, mockingbird, northern shrike, blue jay, American kestrel, cattle egret, palm warblers and marsh hawk. Listed species potentially occupying the property given the large amount of wetland habitat in this location within the region include:

Mammals – Florida bonneted bat

Birds – Little blue heron, white ibis, snowy egret, limpkin, tricolored heron, snail kite, wood stork

Reptiles – American alligator, American crocodile

- C. List all state or federally listed wildlife and plant resources that were observed on the site and show location on Map G. Given the plant communities on-site, list any additional state or federally listed wildlife and plant resources expected to occur on the site and show the location of suitable habitat on Map G. Additionally, address any unique wildlife and plant resources, such as colonial bird nesting sites and migrating bird concentration areas. For species that are either observed or expected to utilize the site, discuss the known or expected location and population size on-site, existence (and extent, if known) of adjacent, contiguous habitat off-site, and any special habitat requirements of the species.**

The only listed species observed on the site was the white ibis (*Eudocimus albus*). It has a state designation as a species of special concern (SSC). Since the site is predominately in pasture or contains dense stands of invasive exotic vegetation, no habitat is available for colonial bird nesting. While there are some planted cypress trees in rows along two (2) roadways and canal easements, the invasive exotics that encroach upon these, negate any significant habitat. Additionally, while the site is within the buffer areas of three (3) wood stork nesting colonies (which have a 30 km diameter buffer zone), no significant foraging or nesting areas are present. Any wood stork related issues that may arise will be addressed during the Federal regulatory wetlands review during the permitting phase.

In addition, while the Florida bonneted bat (*Eumops floridanus*) has been identified in south Florida in association with roof tiles, it is an extremely rare species with only one (1) known colony statewide until 2006 when acoustic surveys detected Florida bonneted bats in Babcock Webb Wildlife Management Area in Charlotte County. Through the introduction of bat roosts by FWC, by May of 2014, 55 bats in six (6) roosts were noted in emergence counts. It is unlikely that the site contains Florida bonneted bats due to the rarity, the lack of large open water bodies on the site and the lack of structures and buildings on the site. However, any issues related to Florida bonneted bats will be addressed through the Federal permitting phase of the subject property.

- D. Indicate what impact development of the site will pose to affected state or federally listed wildlife and plant resources.**

Nearly the entire site is comprised of wetland plant indicators and as such a review of listed species will be conducted by appropriate regulatory agencies during the permitting phase of the project. As such either on-site, off-site or a combination of wetland mitigation scenarios will address and fully compensate for any impacts to species that may be identified during that process.

- E. Discuss what measures are proposed to be taken to mitigate impacts to state and federally listed wildlife and plant resources. If protection is proposed to occur on-site,**

describe what legal instrument will be used to protect the site, and what management actions will be taken to maintain habitat value. If protection is proposed to occur off-site, identify the proposed amount and type of lands to be mitigated as well as whether mitigation would be through a regional mitigation land bank, by acquisition of lands that adjoin existing public holdings, or by other means.

During the permitting phase of the project, the wetlands extent and quality will be determined and appropriate actions will be taken to avoid and minimize impacts together with preparing a plan for mitigation of unavoidable wetlands impacts. It is anticipated that a combination of both on-site and off-site mitigation will be performed and that a regional wetlands mitigation bank will be used to offset impacts. Any on-site mitigation that is conducted will be protected via a conservation easement and an appropriate mitigation monitoring and maintenance plan which will be developed to insure the long-term sustainability and viability of any mitigation area.



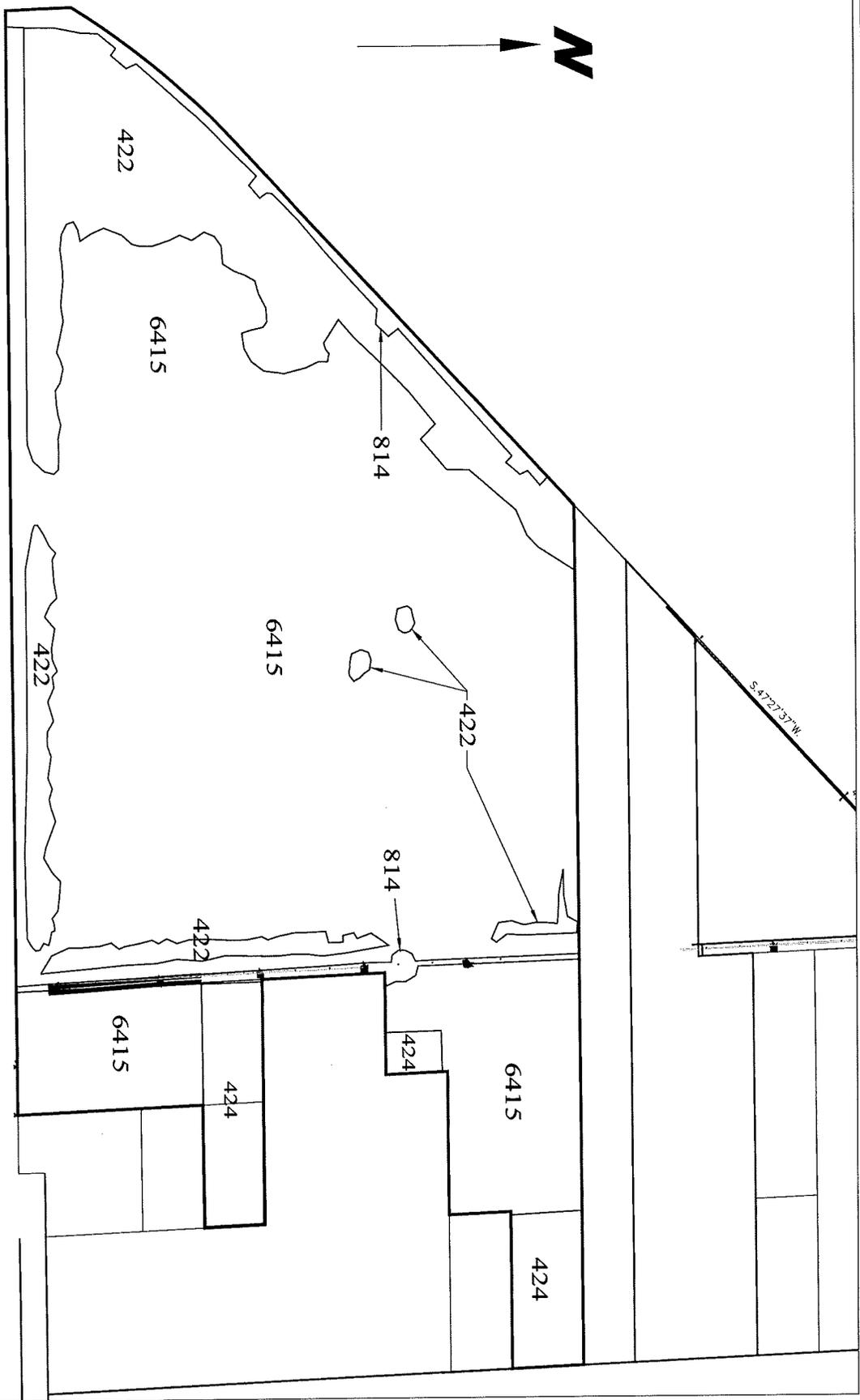
FLUCCS CODE LEGEND
 422 - Brazilian pepper
 424 - Melaleuca
 814 - Roads & Highways
 6415 - Dog Fennel & Low Marsh Grasses

Imagery Date: 12/15/2014 25°56'02.06"

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DATE:	11/15
SCALE:	NTS
DESIGN BY:	MJN
DRAWN BY:	MJN
CHECKED BY:	MJN
APPROVED BY:	MJN
DESCRIPTION:	BY: DATE:

GRAHAM PROPERTY
MIAMI-DADE COUNTY **FLORIDA**
FLORIDA LAND USE COVER & FORMS
CLASSIFICATION SYSTEM MAP
MJN PROJ. No.: 15-104 **SHEET No.: 1 OF 1**



FLUCCS CODE LEGEND
 422 - Brazilian pepper
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DESCRIPTION:	

GRAHAM PROPERTY

MIAMI-DADE COUNTY **FLORIDA**

FLORIDA LAND USE COVER & FORMS CLASSIFICATION SYSTEM MAP

MJN PROJ. No.: 15-104 **SHEET No.: 1 OF 1**

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Question 13

Wetlands

A. If there are wetlands on the site, discuss and specify the following:

- 1. Acreage and percentage of property which is currently wetlands. These wetlands should be shown on Map F, Vegetation Associations, and identified by individual reference numbers. (These numbers should be utilized in responding to the other sub-questions.)**

The subject property contains wetlands, although any jurisdictional boundaries by appropriate regulatory agencies have not been determined. The extent has not been officially determined, but given the extent of hydric soils on the site, all but the roads in the center and in the western boundary contain wetland indicators. In addition, the National Wetland Inventory map of the project vicinity is shown in **Map 13-1**.

- 2. Historic hydroperiods and seasonal water elevations of on-site wetlands.**

This portion of Miami-Dade County according to a 1943 Vegetation Map of Southern Florida by John H. Davis Jr. indicates the project area as sawgrass marshes. This vegetation community in this location would have consisted of wet season water levels of one (1) to two (2) feet above the substrate. Post-drainage conditions have resulted in the ability of much of the site to be in unimproved pasture. Current average water tables in October are approximately 3.8 NGVD while average land elevations on the site are 3.5 NGVD. Wet season water table elevations are approximately 4.0 NGVD.

- 3. Acreage and location of wetlands which are to be preserved in their natural or existing state, including proposed hydro periods, seasonal water elevations and methods for preservation.**

Jurisdictional wetlands boundaries as well as functional values will be determined during the permitting phase of the project. Currently, due to the extent of drainage and other impacts including coverage by invasive exotic vegetation, there are no high quality wetlands on the property. Therefore, no wetland areas are proposed to be preserved at this time. On-site wetlands mitigation and preservation locations and extent will be determined during the permitting phase of the project.

- 4. Acreage and location of wetlands which are to be enhanced in their natural or existing state, including proposed hydro periods, seasonal water elevations and methods of enhancement.**

The acreage and location of wetlands which are to be enhanced in their natural or existing state will be determined during the permitting phase of the project.

5. Actions taken to minimize or mitigate impacts on wetland areas, including maintaining the hydro period and providing buffers.

The proposed actions taken to minimize impacts on wetland areas will be determined after the extent and functional values have been determined during the permitting phase of the project. Any on-site wetlands that may be mitigated may be mitigated on or off site or a combination. At that point, any required changes to hydro periods and ground elevations including the creation of buffers will be proposed.

6. Acreage and location of wetlands which will be disturbed or altered, including a discussion of the specific alterations and disturbances.

The acreage and location of wetlands which will be disturbed or altered will be determined during the permitting phase of the project.

7. Precautions to be taken during construction to protect wetland areas.

Standard erosion and turbidity controls will be installed prior to and during construction to comply with NPDES guidelines.

8. If available, provide jurisdictional determinations.

Jurisdictional wetland determination letters will be obtained during the permitting phase of the project.

B. Provide any proposed plans (conceptual or specific) for created or enhanced wetland areas, including littoral lake slopes, buffers, vegetative species to be planted, etc.

Proposed plans including both conceptual and specific wetland enhancement or restoration plans will be developed during the permitting phase of the project.



Wetlands Mapping Status	
■	Wetlands
■	Estuarine and Marine Deepwater
■	Estuarine and Marine Wetland
■	Freshwater Emergent Wetland
■	Freshwater Forested/Shrub Wetland
■	Freshwater Pond
■	Lake
■	Other
■	Riverine
■	No Data


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DRAWN BY:	MJN
CHECKED BY:	MJN
APPROVED BY:	MJN
DATE:	249
DESCRIPTION:	

GRAHAM PROPERTY	
MIAMI-DADE COUNTY	FLORIDA
NATIONAL WETLANDS INVENTORY MAP	
MJN PROJ. No.: 15-104	SHEET No.: 1 OF 1

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Question 14 – Water

- A. Describe the existing hydrologic conditions (both ground and surface water) on and abutting the site, including identification and discussion of any potential aquifer recharge areas. Please identify and describe any Outstanding Florida Waters, Wild and Scenic Rivers, Florida Aquatic Preserves or Florida Class I or II Waters that occur within, abutting or downstream of the site.**

The site is primarily pasture lands for cattle with some portions of the site east of proposed NW 97 Avenue covered by a dense mallacusa forest (invasives). The topography of the property averages at an elevation of 3.5 feet NGVD. The site is bounded by I-75 to the East, the Florida Turnpike to the West and a Canal Maintenance Road to the South (NW 170th Street Canal).

Periodic flooding of the site occurs during the wet season. Groundwater conditions range from 3.8 feet NGVD, (average October high) to 1.0 feet NGVD (average yearly lows). Due to the low elevation of the site, most of the rain that falls on this site recharges the Biscayne Aquifer. During very severe events, some of the water may overflow into the existing canal (NW 170 Street, Golden Glades Canal).

No surface waters presently exist on the site. The nearest open bodies of water are the NW 170 Street Canal, Turnpike drainage ditches, and lakes west of the Turnpike which are a result of ongoing rock mining operations.

The recharge of the aquifer in, and adjacent to, the subject property will occur during the wet season by rainfall events percolating through the existing surficial soils. In addition, the adjacent canals and borrow pits to the west of the subject property will also recharge the aquifer during the dry months of the year. The groundwater movement of the Biscayne Aquifer, through the underlying limestone formations and the canal systems in a southerly and southeasterly direction, and from the SFWMD conservation areas and the Biscayne Aquifer in Monroe and Broward Counties acts as a recharge mechanism during the dry months of the year.

There are no outstanding Florida Waters wild and scenic rivers, Florida Aquatic preserves or Class I and II Water Bodies within, abutting or downstream of the subject property.

- B. Describe, in terms of appropriate water quality parameters, the existing ground and surface water quality conditions on and abutting the site. (The appropriate parameters and methodology should be agreed to by the regional planning council and other reviewing agencies at the pre-application conference stage.)**

There are no Miami-Dade County or SFWMD active water monitoring stations adjacent or near this site. The Historical uses of this property, such as natural wetlands, cow pasture and mallaluca forested areas in our opinion do not degrade or impact groundwater or surface water on or near the site.

C. Describe the measures which will be used to mitigate (or avoid where possible) potential adverse effects upon ground and surface water quality, including any resources identified in Sub question A.

The site will be designed and constructed in accordance with the SFWMD C-9 criteria and Miami-Dade County RER/DERM Environmental Permit requirements.

The site will have a series of on-site lakes interconnected by culverts. The Graham Application Area drainage system will incorporate water quality components, such as French Drains and/or detention swales to insure that the water runoff is treated before entering the on-site lakes. The proposed lakes will recharge the existing Biscayne Aquifer.

During construction, special precautions will be taken to insure that untreated stormwater runoff will not enter the NW 170 Canal, the Turnpike drainage ditch or swale, or the newly excavated lakes. See aerial below. Berming, silt fences and other water quality schemes will be incorporated during construction.



Question 15 – Soils

- A. 1. Provide a description of each of the soils indicated on Map E utilizing the following format:
 Map E, Soil Map, shows the location of the soil group. Table 15-1, Soil Group Description and Interpretation summarizes the characteristics of the soils found at the project site.

Table 15-1 Soil Group Description and Interpretation					
SOIL NAME AND MAP SYMBOL	BRIEF SOIL DESCRIPTION	SEASONAL HIGH WATER TABLE DEPTH DURATION	PERMEABILITY RATE (in/hour)	DEGREE AND KIND OF LIMITATION FOR PROPOSED USES	DEGREE AND KIND OF LIMITATION FOR POND EMBANKMENTS
Lauderhill muck, depressional (3)	Moderately deep, nearly level, very poorly drained organic soils underlain by hard porous oolitic limestone at a depth of approx. 30 inches	The soil is ponded for 9 to 12 months in most years. When water is not ponded, the water table is at a depth less than 10 inches.	6.0 to 20	Severe: subsides, ponding, low strength	Severe: excess humus, ponding
Dania muck, depressional (14)	Shallow, nearly level, very poorly Drained organic soil underlain by soft porous limestone at a depth of approx. 15 inches.	The soil is ponded most of the year. When water is not ponded, the water table is at a depth less than 10 inches.	6.0 to 20	Severe: ponding, low strength, depth to rock	Severe: excess humus, ponding

2. Describe the potential for subsidence and any unique geologic features (such as sand dunes, bluffs, sinkholes, springs, steepheads, etc) on the site. Discuss what aspects of the site plan will be used to compensate for or take advantage of these features.

No unique geologic features are found on the subject property.

- B. Where a soil presents a limitation to the type of use proposed in the development, state how the limitation will be overcome. Specify construction methods that would be used for building, road and parking lot foundations, and for lake or canal bank stabilization as relevant.

The site will be developed by utilizing the soils as excavated from the proposed lakes. The excavation of the on-site lakes will yield a sand and limerock fill material suitable for the construction of the subgrade of the roadways and building pads. The lake slopes will be stabilized by sodding the area from the water's edge to the top of slope. A berm (12" high) will be built at the top of slope to prevent direct overland runoff.

- C. What steps will be taken during site preparation and construction to prevent or control wind and water soil erosion? Include a description of proposed plans for clearing and grading as related to erosion control.

Silt fences, berms and turbidity barriers will be used during the construction of the site.

- D. To what degree and in what location(s) will the development site be altered by fill material? If known, specify the source location and composition of the fill. Also identify the disposal location for any overburden or spoil.

The fill material for this site will be primarily obtained by excavations of on-site lakes. If the on-site lakes cannot produce the site's fill requirements, nearby off-site commercial quarries will provide the required fill. The existing organic soil over burden will be utilized on-site.

Question 16 – Floodplains

A. Identify any pre-and post-development flood prone areas.

The property is located in flood zone AE (EI. 7) which is a flood zone subject to 100-year flood event.

B. Is any development proposed within a 100-year flood prone area as identified by the Federal Emergency Management Agency? If so, indicate the appropriate Flood Insurance Rate Map zone designations and their locations, etc.)

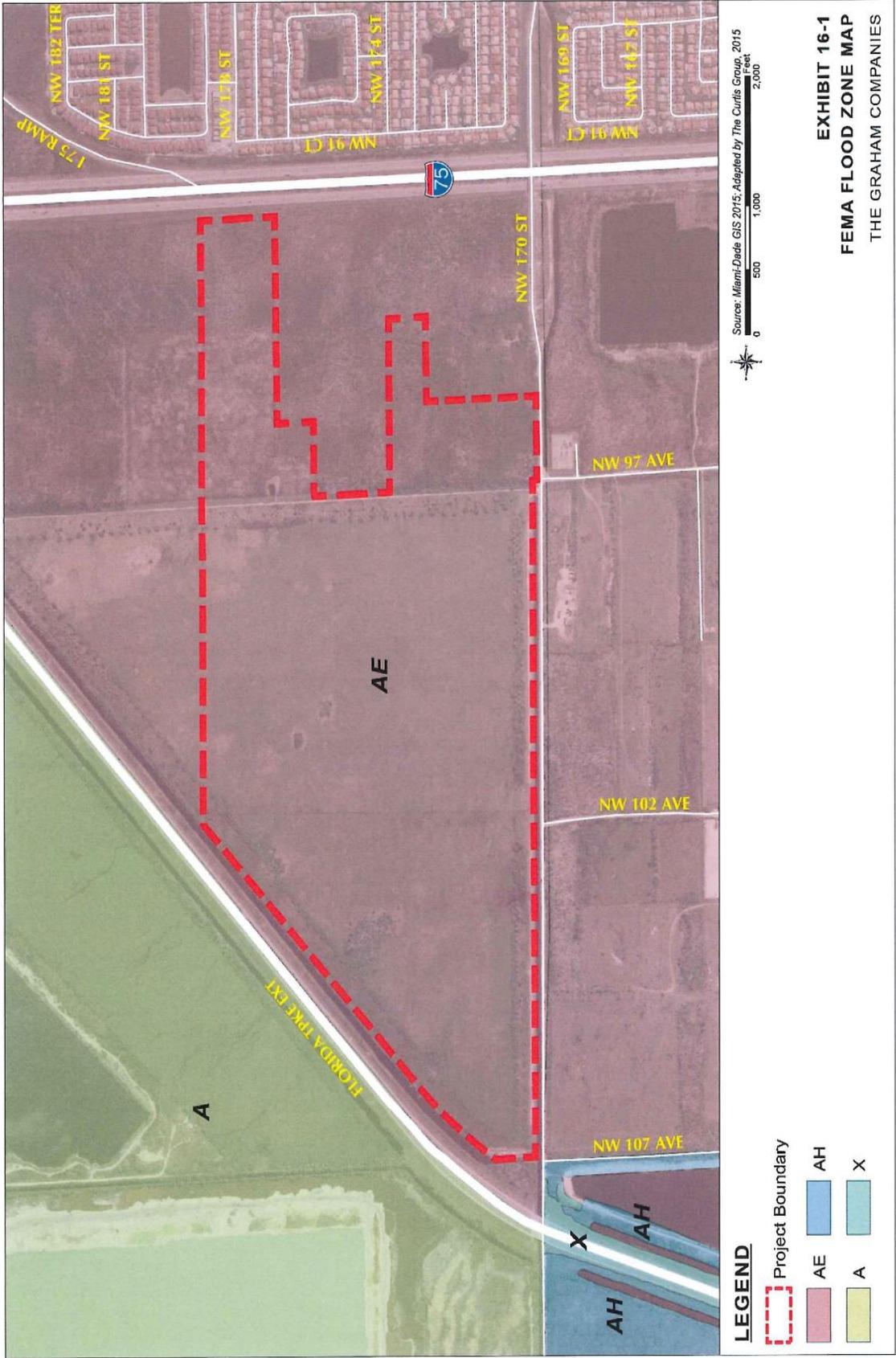
The entire property is located in flood zone AE, EI. 7.0 as shown in Exhibit 16-1, FEMA Flood Zone Map.

C. If any structures, roadways or utilities are proposed within the post-development 100-year flood prone area, identify their location and indicate what measures will be taken to mitigate the potential flood hazard and to maintain the 100-year floodplain storage volume.

The roadways and building finish floor will be designed to an elevation determined by South Florida Water Management District (SFWMD) Western C-9 Basin Criteria, and Dade Counties Flood Criteria Map. The proposed on-site lakes, which are part of the overall stormwater management system, will provide the required storage volume to meet the above mentioned criteria.

D. Discuss any potential increases in the off-site flooding due to the development of this project.

The SFWMD Western C-9 criteria requires that the proposed development provide a compensating flood encroachment volume. The proposed development will provide the required encroachment storage volume, in order to insure that there is no negative impact to the Western C-9 Basin. Any discharge from this site to the adjacent NW 170 Canal will meet the allowable discharge criteria establishes by the SFWMD.



Question 17 – Water Supply

- A. 1. Provide a projection of the average daily potable and non-potable water demands at the end of each phase of development. If significant seasonal demand variations will occur, discuss anticipated peaks and duration. Use the format below:

Table 17-1 Potable Water Demand					
Land Use	Unit	Quantity	Water Use (GPD/Unit) ¹	Est. Potable Water Average Daily Demand (MGD*)	Est. Potable Water Maximum Daily Demand (MGD) ²
Proposed Land Use					
1. Retail	Sq. ft.	750,000	10 GDP/100 sq.ft.	0.075	0.169
2. Office/Business	Sq. ft.	3,000,000	5 GDP/100 sq.ft.	0.150	0.338
3. Restaurant	Sq. ft.	250,000	100 GDP/100 sq.ft.	0.250	0.563
4. Apartment Units	Each	2,000	150/apartment	0.300	0.675
Sub-total				0.775	1.744
Approved Land Use					
Graham East of NW 97 Avenue					
1. Warehouse	Sq. ft.	1,310,938	1 GDP/100 sq.ft.	0.013	0.029
Graham West of NW 97 Avenue					
1. Office	Sq. ft.	242,700	5 GDP/100 sq.ft.	0.012	0.027
2. Business Park/ Showroom	Sq. ft.	404,500	5 GDP/100 sq.ft.	0.020	0.045
3. Warehouse	Sq. ft.	2,588,800	1 GDP/100 sq.ft.	0.026	0.059
Sub-total				0.071	0.160
Total Net Change				0.704	1.584

(*) MGD= Millions of Gallons per Day

Notes:

1. Water Demand Rates are based upon the Miami-Dade County Schedule of Daily Gallonage for Various Occupancy.

2. Maximum Daily Demand is 225% of the A.D.D. and the Peak Hour Demand is 450% of A.D.D. per Miami-Dade County Public Works Manual Part II, section D8.03b

Non-Potable Water Demand

The non-potable water demand will be generated by the irrigation needs of the site. Estimating 20% of landscape area, which equates to approximately 68 acres and the requirements of 40,000 gallons, per acre, per week, we anticipate a daily demand of 0.389 MGD.

2. Describe how this demand information was generated, including the identification of the consumption rates assumed in the analysis.

The rates for Average Daily Demand were obtained from the Miami-Dade County Schedule of Daily Gallonage for Various Occupancy. In addition, per the Miami-Dade County Public Works Manual Part II, Section D8.03b, the Maximum Daily Demand was calculated as 225% of the Average Daily Demand (A.D.D.) and the Peak Hour Demand was calculated as 450% of A.D.D.

B. Provide a breakdown of sources of water supply, both potable and non-potable, by development phase through project completion. Use the format below.

The potable water supply will be supplied by Miami-Dade Water and Sewer Department (WASD). A Letter of Availability (LOA) has been requested from the Department. Non-potable water used for irrigation will be obtained from the proposed lakes or shallow wells that will be permitted through the South Florida Water Management District (SFWMD) and Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management (DERM).

C. If water wells exist on-site, locate them on Map H and specify those that will continue to be used. Also located on Map H are all proposed on-site wells. (For residential developments, if individual wells for each lot are proposed, simply indicate the number of units to be served, general locations, and any plans for eventual phase-out.) Indicate the diameter, depth, and pumping rates (average and maximum) for each of the existing wells and project this information for the proposed wells (for lots served by individual wells, this information may be grouped for projection purposes). Also provide a breakdown of the wells with regard to potable and non-potable sources.

There are no existing potable water wells on the subject property. There are four (4) potable water wells which service the City of Hialeah Reverse Osmosis Water Treatment Plant, on the adjacent property, abutting the Florida Turnpike. See the location on page 14-3 in the response to Question 14 – Water.

No potable water wells are proposed on the subject property. Potable water is expected to be provided by WASD. The four wells that serve the City of Hialeah Reverse Osmosis Water Treatment Plant have been drilled to the depth to obtain potable water from the Floridan Aquifer System. The top of the Floridan Aquifer System is about 950 to 1,000 feet below sea level. Overlying the Floridan Aquifer System is the Hawthorn Formation, which acts as a confining unit between this aquifer and the shallower gray limestone aquifer. At the top of the gray limestone aquifer, there is a semi-confining unit which separates the top of the gray limestone aquifer from the bottom of the surficial Biscayne Aquifer. Due to the depth of the Floridan Aquifer and the various confining units, the development of this site will not have an adverse effect on operation and/or quality of the potable waters being pumped from these

adjacent wells.

- D. If on-site water wells are used, will this result in interference with other water wells or result in adverse impacts to underlying or overlying aquifers? Document the assumptions underlying this response.**

No on-site potable wells are proposed on the Graham Application Area. Non-potable water used for irrigation will be obtained from the proposed on-site lakes and/or shallow wells that will be permitted through SFWMD and Miami-Dade County DERM.

- E. Who will operate and maintain the internal water supply system after completion of the development?**

The internal water distribution system will be built by the developer and transferred to WASD for operation and maintenance.

- F. 1. If an off-site water supply is planned, attach a letter from the agency or firm providing service outlining:**

- (a) the projected excess capacities of the water supply facilities to which connection will be made at present and for each phase through completion of the project,**
- (b) any other commitments that have been made for this excess capacity,**
- (c) a statement of the agency or firm's ability to provide services at all times during and after development. (This agency must be supplied with the water demand and supply tables in paragraphs A and B above).**

A Letter of Availability (LOA) has been requested from WASD. Prior to the design and permitting of the potable water system, a Water and Sewer Agreement with WASD will be entered into by the Developer, defining the required improvements.

- 2. If service cannot be provided at all times during and after development, identify the required capital improvements, timing, cost, and proposed responsible entity for each phase in which service is unavailable.**

The developer will be responsible for the improvements required to service the proposed development. It is anticipated that potable water main extensions will be required to serve the Project. The exact off-site improvement requirements will be outlined in the WASD Agreement.

G. Please describe any water conservation methods or devices incorporated into the plan of development. What percentage of reduction is anticipated over conventional plans?

The proposed development will incorporate water conservation measures listed in Section 604.4 of the Florida Building Code. In addition, during periods of water shortage, the Project will adhere to the requirement guidelines of Chapter 24, Section 12.1(8) of the Miami-Dade Code and Chapter 40E-21 of the Florida Administrative Code.

The Project's landscape areas will also control the amount of irrigation water, by incorporating components of xeriscape landscaping principals. In addition, rain sensors will be incorporated in the irrigation systems to reduce the volume of irrigation water used during the wet season.

H. Indicate whether proposed water service will be provided within an established service area boundary.

The Project is within the WASD service area. A LOA that has been requested from WASD will state their commitment to provide this service.

Question 18 – Wastewater Management

- A. Provide, in the table given below, the projected wastewater generation at the end of each phase of development and proposed wastewater treatment. Identify the assumptions used to project this demand.

The table below shows the wastewater generation for the proposed uses:

Table 18-1 Wastewater Flows					
Land Use	Unit	Quantity	Sewage Loading (GDP/Unit) ¹	Total Est. Sewage Flows (MGD)	Peak Hourly Sewage Flows (MGH) ²
Proposed Land Use					
1. Retail	Sq. ft.	750,000	10 GDP/100 sq.ft.	0.075	0.01
2. Office/Business	Sq. ft.	3,000,000	5 GDP/100 sq.ft.	0.150	0.02
3. Restaurant	Sq. ft.	250,000	100 GDP/100 sq.ft.	0.250	0.03
4. Apartment Units	Each	2,000	150/apartment	0.300	0.04
Sub-total				0.775	0.097
Approved Land Use					
Graham East of NW 97 Avenue					
1. Warehouse	Sq. ft.	1,310,938	1 GDP/100 sq.ft.	0.013	0.02
Graham West of NW 97 Avenue					
1. Office	Sq. ft.	242,700	5 GDP/100 sq.ft.	0.012	0.00
2. Business Park/ Showroom	Sq. ft.	404,500	5 GDP/100 sq.ft.	0.020	0.01
3. Warehouse	Sq. ft.	2,588,800	1 GDP/100 sq.ft.	0.026	0.03
Sub-total				0.071	0.057
Total Net Change				0.704	0.040

Notes:

1. Sewage Loading Rates are based upon the Miami-Dade County Schedule of Daily Gallonage for Various Occupancy.
2. A conservative Peak Hourly Flow factor of 3 was used based on the "Ten States Standards"

- B. If applicable, generally describe the volumes, characteristics and pre-treatment techniques of any industrial or other effluents prior to discharge from proposed industrial-related use(s).

No uses requiring pretreatment are anticipated.

- C. **1. If off-site treatment is planned, identify the treatment facility and attach a letter from the agency or firm providing the treatment outlining present and projected excess capacity of the treatment and transmission facilities through buildout, any other commitments that have been made for this excess and a statement of ability to provide service at all times during or after development.**

Offsite wastewater treatment will be provided by Miami-Dade Water and Sewer Department (WASD). A Letter of Availability has been requested from the Department.

- 2. If service cannot be provided, identify the required capital improvements, cost, timing, and proposed responsible entity necessary to provide service at all times during and after development.**

The capital improvements requirement for the off-site and on-site wastewater facilities will be the responsibility of the developer. These improvements will be phased to accommodate the construction sequence. These improvement requirements will be initially outlined in the Letter of Availability that has been requested from WASD. Said improvements will be further refined in the final Water and Sewer agreement with WASD.

- D. **If septic tanks will be used on site, indicate the number of units to be served, general locations and any plans for eventual phase-out.**

No septic tanks are proposed for this Project.

- E. **Indicate whether proposed wastewater service will be provided within an established service area boundary.**

The Project is within the boundaries of the service area of WASD.

Question 19 – Stormwater Management

- A. Describe the existing drainage patterns on-site as shown on Map I, including any potential flooding and erosion problems.**

The predevelopment condition of the lands that compose the Graham Application Area is mostly low lying pasture lands with a topography that averages 3.5 feet NGVD. The site is bounded by the Florida Turnpike to the west, I-75 to the east and a canal maintenance road (NW 170 Street) to the south. All of these roadways are higher than the average site grade of 3.5 feet NGVD. The combination of the flat low topography and the higher perimeter grades create a site that is prone to flooding during rainy season. The flooding retreats through percolation in the surficial soils and some overland flow to the NW 170 Street Canal.

- B. Describe the drainage system shown on Map I, including any wetlands to be used as part of the system, and discuss the design criteria (including stage-storage/stage discharge assumption) to be used for the various elements. Provide typical cross-sections (showing dimensions, slopes and control elevations) for any proposed lakes or swales. Identify the control elevation for all drainage structures. Include information as to what design storm will be used for what portions of the system.**

The Project's stormwater management system will be designed and constructed in accordance with the Western C-9 criteria as established by the Water Management plan for the Western C-9 Basin, adopted by the South Florida Water Management District.

The study primarily revolves around the portion of criteria dealing with flood plain encroachment. The implementation of this portion of the criteria, states that "the volume encroachment by development between average existing ground surface and elevation 7.0 feet MSL shall not exceed 2.0 feet times the total area of the property". This encroachment rule, together with the consideration of other design parameter, such as roads and parking areas will be designed to the elevation shown in **Exhibit 19-1, Miami-Dade County Flood Criteria Map (Elevation 7.0 feet NGVD)**. **Exhibit 19-2, Miami-Dade County Average October Groundwater Level** generates the required stormwater management areas for the development. The required stormwater management areas will be in the form of on-site lakes and/or dry retention areas. If this development cannot provide the on-site stormwater management requirements, off-site compensating storage will be considered.

The stormwater management system will also be designed to accommodate 3-day – 25 year (**Exhibit 19-3, SFWMD 3-Day Rainfall: 25 Year Return Period**) and a 3-day – 100 year (**Exhibit 19-4, SFWMD 3-Day Rainfall: 100 Year Return Period**) storm events. The rainfall volumes associated with these storm events are 13 inches and 16 inches, respectively. The flood elevations resulting from these two rainfall events will dictate the perimeter grades for the site and affect the minimum finish floor elevation. The minimum finish elevation will also be

dictated by Miami-Dade County Zoning Code and FEMA 100 year Flood Zone designation (AE, 7.0 Feet NGVD) or the C-9 Basin's 100 year flood elevation of 7.3 NGVD. The highest of these elevations will establish the minimum finish floor elevation for this Project.

In regards to the wetland mitigation, requirements may be met partially on-site in combination with a contribution to an approved mitigation bank. The areas indicated in **Map H, Master Development Plan** as lakes are expected to be partially constructed as wetland areas with their associated buffers.

- C. From Map I, indicate the total number of acres in each drainage area and specify the acreage of any portions of drainage areas outside the site boundaries. Complete the following table for on-site drainage areas.**

The site will be designed to retain the runoff from a 25 year – 3 day rainfall storm event. The stored volume from this storm event will be discharged at the rate established by the SFWMD for the Western C-9 Basin. This particular discharge rate will be as determined by the SFWMD using a pre- and post-analysis, or as determined by the capacity of the NW 170 Street Canal. The receiving water body for this capacity will be the NW 170 Street Canal. This canal flows east under I-75 to the Western C-9 Canal. The final assessment of the required on-site stormwater management (acreage), will be determined at the time of the preparation of the SFWMD Environmental Resource Permit.

- D. Specify and compare the volume and quality of run-off from the site in its existing condition to the anticipated run-off at the end of each phase of development. (The parameters to be used to define "quality" and methodology should be agreed to by the regional planning council and other reviewing agencies at the pre-application conference state). Identify any changes in timing or pattern of water flows between pre- and post-development conditions. Indicate major points of discharge and ultimate receiving water body(ies). Indicate what provisions will be incorporated in the design of the drainage system including a summary description of any Best Management Practices to be utilized, to minimize any increase in run-off from the site and to minimize any degradation of water quality in the ultimate receiving body over that occurring in its pre-development state.**

Water quality is anticipated to be addressed by treating a minimum of one inch of runoff through a French Drain System. Prior to discharging into the on-site lakes, any additional water quality requirement, will be via wet detention in the on-site lakes. The incorporation of these two water quality features will provide the water quality requirements established by the SFWMD.

The required water quantity storage volumes, as generated by the 25-year and 100-year – 3 day storm events, will be stored in the lakes and parking areas. This storage volume will be discharged to the NW 170 Street Canal, through a control structure, at a rate determined by a pre- and post-runoff analysis or the capacity of the NW 170 Street Canal to accept such discharge. Approval from the SFWMD and Miami-Dade County Water Control will be required.

E. Who will operate and maintain the drainage system after completion of the development?

All drainage systems within the public right-of-ways will be owned and maintained by the Miami-Dade County Public Works Department. Homeowners or property owner association(s) are expected to own and maintain the drainage system located within private roads, and the privately owned lakes and outfall structures which are part of the overall stormwater management system.

The lake portion of the water management system will be maintained by the owner, with a Miami-Dade County Dormant Taxing District to guarantee maintenance in case the owner/developer fails in their maintenance duties. The drainage system for all public roadways will be maintained by the Miami-Dade County Public Works Department.

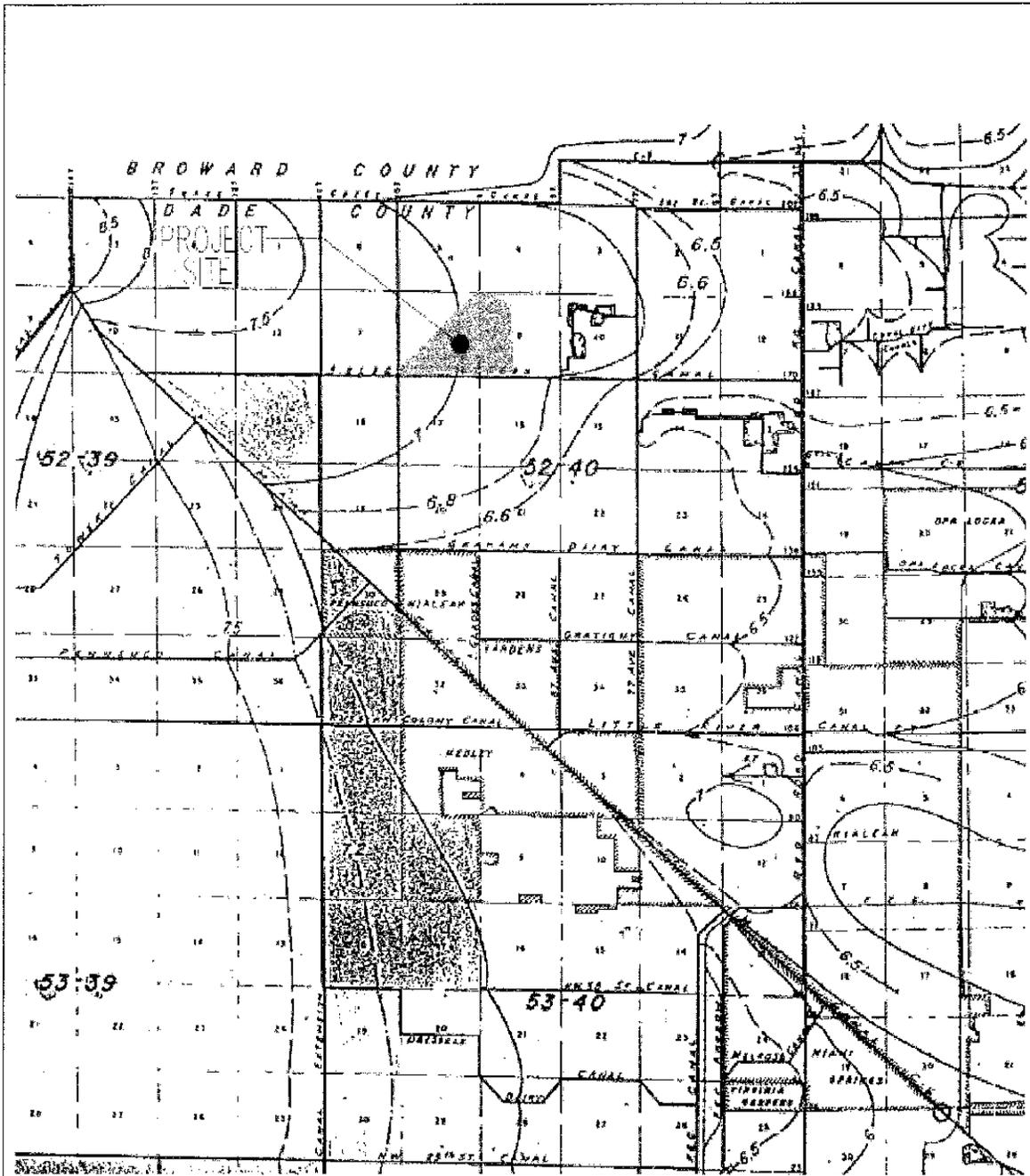


EXHIBIT 19-1
MIAMI-DADE COUNTY FLOOD CRITERIA MAP

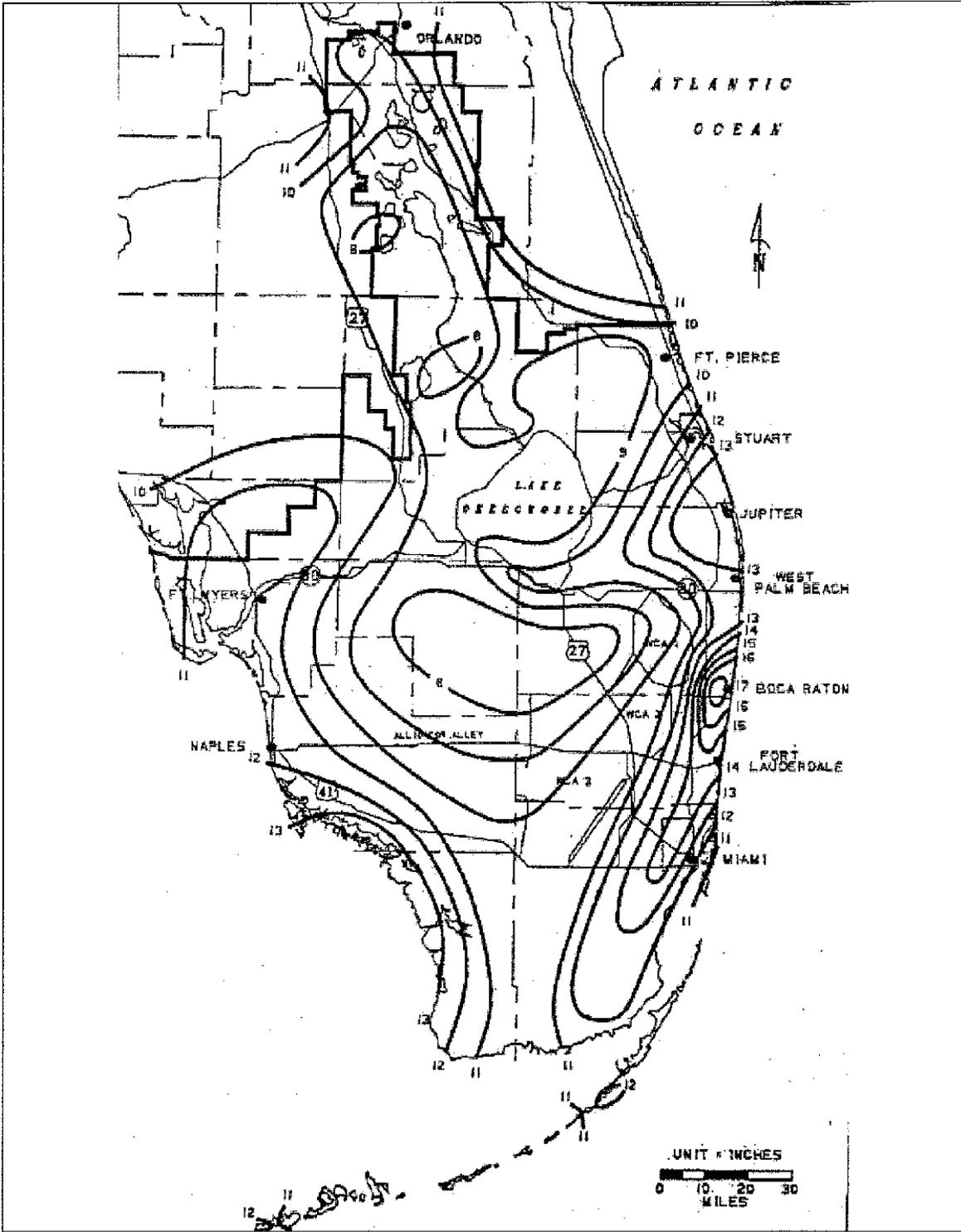


EXHIBIT 19-3
SFWMD 3-DAY RAINFALL: 25 YEAR RETURN PERIOD

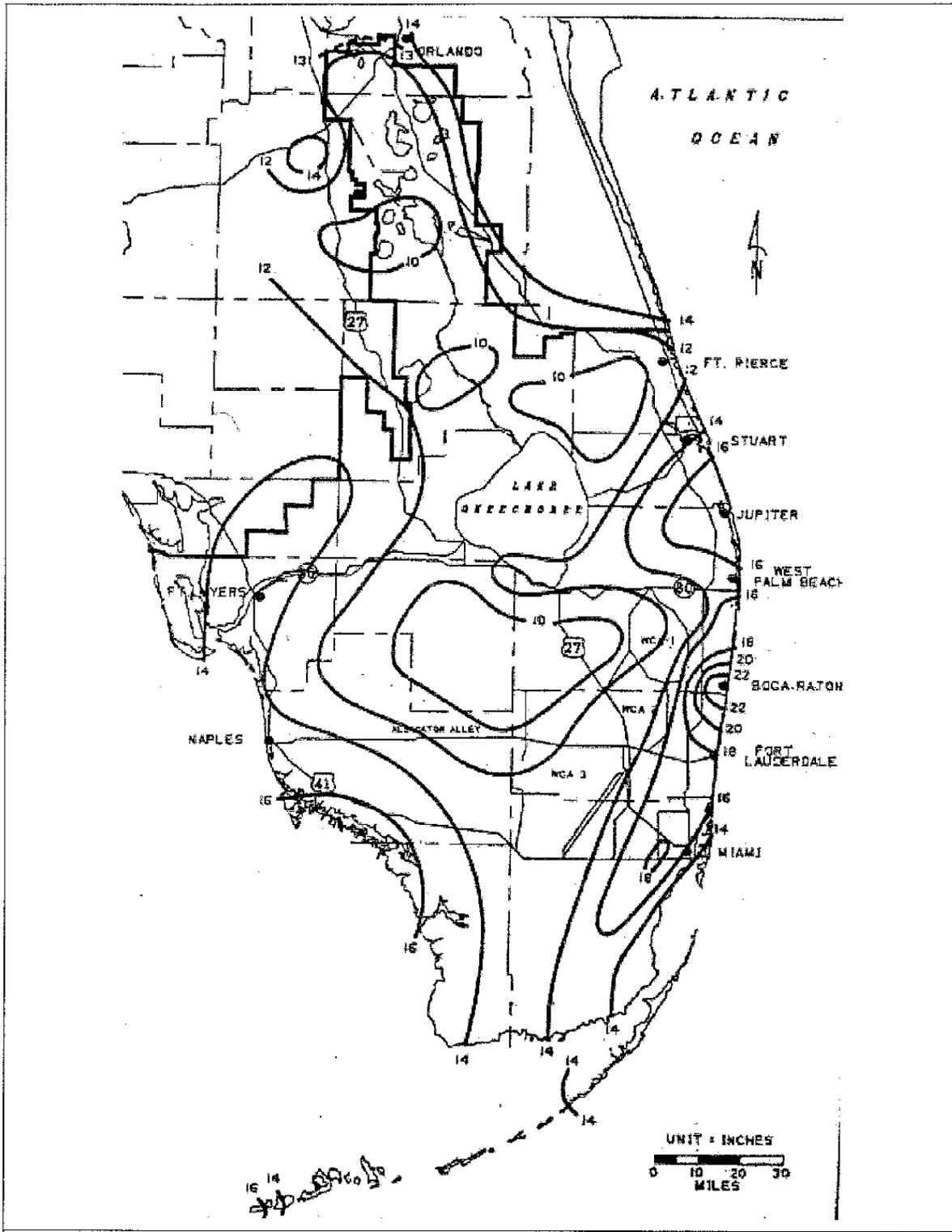


EXHIBIT 19-4
SFWMD 3-DAY RAINFALL: 100 YEAR RETURN PERIOD

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Question 20 – Solid Waste / Hazardous Waste / Medical Waste

- A. Provide a projection of the average daily volumes of solid waste generated at the completion of each phase of development. Use the format below and identify the assumptions used in the projection.

Table 20-1, Projected Solid Waste Generation, details the solid waste generation rates for the proposed development program.

Table 20-1 Projected Solid Waste Generation*			
Land Use	Development Program	Generation Rate (lbs/unit/day)	Estimated Demand
Business Park	3,000,000 sq. ft.	0.6 lb/100 sq. ft./day	18,000 lb/day
Commercial	1,000,000 sq. ft.	13 lb/1,000 sq. ft./day	13,000 lb/day
Residential	2,000 dwelling units	4.0 lb/unit/day	8,000 units lb/day
Total			39,000 lb/day

*Generation Rates pursuant to 2013 California Department of Resources Recycling and Recovery (CalRecycle).

- B. 1. Please specify the extent to which this project will contain laboratories, storage facilities, and warehouse space where hazardous materials may be generated or utilized. What types of hazardous waste or toxic materials are likely to be generated? Will a hazardous materials management plan be prepared covering all uses of hazardous materials on-site? If so, please discuss contents and enforcement provisions.

Solid waste generated by development will be consistent with the waste generated by the land uses in the development program. The industrial uses expected to occur within the Employment Center (analyzed under the Business Park use), if any, are offices, light warehousing, telecommunications, and computing activities that are clean and are not expected to use or generate hazardous material. Given the extent of the development program, a small amount of hazardous waste may be generated by development.

There are presently no planned laboratories, storage facilities, or warehouse space that will contain hazardous materials as defined by Rule 73C-40.044(2f) of the Florida Administrative Code (FAC). Nonetheless, any of said uses would be subject to the Miami-Dade County Code, which requires operating permits for all generators or users of hazardous materials. Section 24.35.1 of the County Code lists those businesses typically required to obtain a

permit by the Miami-Dade County Department of Environmental Resources Management (DERM). In order to be permitted, businesses must comply with all local, state, and federal regulations regarding the handling, management, and disposal of hazardous materials.

2. Please discuss what measures will be taken to separate hazardous waste from the solid waste stream. What plans and facilities will be developed for hazardous or toxic waste handling, generation, and emergencies?

All businesses using or generating hazardous materials are required to be permitted by the Miami-Dade County Department of Regulatory and Economic Resources (RER). In order to be permitted, businesses must comply with all local, state, and federal regulations regarding the handling, management, and disposal of hazardous materials, including the proper procedures for separating hazardous waste from the solid waste stream.

As noted in B.1. above, there are presently no planned laboratories, storage facilities, or warehouse space that will contain hazardous materials as defined by Rule 73C-40.044(2f), FAC. If, in the future, hazardous waste or toxic materials were generated or handled within a facility, said waste and materials would be separated from the solid waste stream pursuant to FAC and RER regulations. The Pollution Control Division of RER is responsible for enforcing federal, state, and local regulations regarding the handling, management, and disposal of hazardous materials. Miami-Dade and Florida regulations comply with Title 40, Parts 260-265, of the Code of Federal Regulations (CFR), which stipulates the requirements for hazardous waste management. The Community Emergency Management Plan for Miami-Dade County is the official emergency response plan for dealing with hazardous waste emergencies. The Miami-Dade County Office of Emergency Management and the Disaster Division of the Miami-Dade County Fire Rescue Department are the coordinators of this trans-agency plan.

3. Please identify off-site disposal plans for hazardous waste generated by this development and provide assurance of proper disposal by a qualified contractor.

In order to receive an operating permit from RER to generate or use hazardous materials, individual businesses must identify their licensed disposal contractor. Additionally, each business would be required to prepare and seek approval from reviewing agencies of a Hazardous Material Management Plan (HMMP) pursuant to Rule 73C-40.044(2), FAC.

4. What local and state regulations, permits and plans will regulate the generation and handling of hazardous waste at this development?

Presently, hazardous materials and waste usage and handling are regulated by the following codes and ordinances:

- Rule 73C-40.044, FAC
- Chapter 62-730, FAC (Environmental Protection: Hazardous Waste);
- Title 40, Parts 260-265, CFR (Protection of Environment: Hazardous Waste); and
- Chapter 24 of the Miami-Dade County Code (Environmental Protection).

C. For all waste disposal planned (on or off site), attach a copy of the letter from the developer describing the types and volumes of waste and waste disposal areas requested, and attach a letter from the agencies or firms providing services outlining:

- 1. the projected excess capacity of the facilities serving the development at present and for each phase through completion of the project,**
- 2. any other commitments that have been made for this excess capacity,**
- 3. a statement of the agency's or firm's ability to provide service at all times during and after development (the agency or firm must be supplied with the solid waste generation table in (A) above).**

Solid waste disposal for the Project will be provided or managed by the Miami-Dade County Solid Waste Department. **Exhibit 20-1, Letter to Miami-Dade County Solid Waste Department,** addresses the County's ability and commitment to provide waste disposal services for this project.

EXHIBIT 20-1
LETTER TO MIAMI-DADE COUNTY SOLID WASTE DEPARTMENT

TO BE PROVIDED UNDER SEPARATE COVER

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**Page II-20 – Transportation Element
Status of the Transportation Improvements for 2005 - Amendment No. 5**

The Metropolitan Planning Organization (MPO), which coordinates all transportation planning for Miami-Dade County, is responsible for periodically updating the MPO's Long Range Transportation Plan. It is anticipated that the future traffic circulation network included in the Transportation Element will be adjusted during future plan amendment cycles to reflect the findings of that planning activity, in keeping with the goals, objectives and policies of the CDMP.

With regard to the following transportation improvements necessary to serve Application No. 5 in the April 2005-2006 CDMP Cycle, in no event shall a Building Permit for development within that area be issued until the MPO Miami-Dade Long Range Transportation Plan has been amended to reflect the following changes in priority of the construction phasing of the roadway network:

- I-75 between Miami-Dade/Broward County Line and SR 826/Palmetto Expressway: from 8 lanes to 10 lanes, advance to Priority 3 (2021-2025);

Response: This improvement has advanced beyond the required threshold to Priority 1 in the 2040 LRTP (see pages 6-9 and 6-10) and is under construction as Express Lanes (Managed Lanes) pursuant to TIP 2016 Project Numbers 4217072 and 4217078 expanding I-75 from 8LD to 10LD from the Dade/Broward County Line to SR 826/Palmetto Expressway.

- SR 826/Palmetto Expressway between NW 103 Street and NW 154 Street: from 8 lanes to 10 lanes, advance to Priority 3 (2021-2025);

Response: This improvement has advanced beyond the required threshold to Priority 1 in the 2040 LRTP (see pages 6-9, 6-10 and 6-12) and is under construction as Express Lanes (Managed Lanes) pursuant to TIP 2016 Project Number 4326871 expanding I-75 from 8LD to 10LD from NW 154 Street to NW 103 Street.

- SR 826/Palmetto Expressway from NW 154 Street to I-95: from 6 lanes to 8 lanes, advance to Priority 3 (2021-2025);

Response: This improvement has been advanced as required to Priority 3 in the 2040 LRTP (see pages 6-23 and 6-24).

- HEFT from SR 836 to Okeechobee Road: 8 lanes + auxiliary lanes, advance to Priority 3 (2021 to 2025),

Response: This improvement has advanced beyond the required threshold to Priority 1 in the 2040 LRTP (see pages 6-9 and 6-12) and is under construction as Express Lanes (Managed Lanes) pursuant to TIP 2016 Project Number 4355421 and 4355431 expanding HEFT from 6LD to 10LD from SR-836 Street to NW 106 Street and from NW 106 Street to I-75.

Page II-20 – Transportation Element
Status of the Transportation Improvements for 2005 - Amendment No. 5

- HEFT from Okeechobee Road to I-75: 8 lanes + auxiliary lanes, advance to Priority 3 (2021 to 2025), and

Response: This improvement has advanced beyond the required threshold to Priority 1 in the 2040 LRTP (see pages 6-9 and 6-12) and is under construction as Express Lanes (Managed Lanes) pursuant to TIP 2016 Project Number 4355421 and 4355431 expanding HEFT from 6LD to 10LD from SR-836 Street to NW 106 Street and from NW 106 Street to I-75.

- HEFT from I-75 to Turnpike Mainline: from 4 lanes to 6 lanes, advance to Priority 3 (2021 to 2025).

Response: The widening of the HEFT to 8 lanes from I-75 to SW 157 Avenue and from SW 157 Avenue to the Turnpike Mainline is currently included in Priority 4 of the 2040 LRTP (see pages 6-29 and 6-30).

The proposed transportation network is expected to evolve incrementally over the next twenty years. The first five-year components are based on the current adopted Transportation Improvement Program. Improvements that are the County's responsibility are listed in the Capital Improvements Element. The remainder of improvements is projected for construction between 2017 and 2035; the phasing of all improvement projects is listed in the adopted MPO's Long Range Transportation Plan.

Roadway alignments shown in the traffic circulation map series are general indicators of facility location. Specific alignments will be determined through detailed transportation planning, development review processes, subdivision platting, and highway design and engineering studies.

II-20

Question 22 – Air Impacts

- A. Document the steps which will be taken to contain fugitive dust during site preparation and construction of the project. If site preparation includes demolition activities, provide a copy of any notice of demolition sent to the Florida Department of Environmental Regulation (FDER) as required by the National Emission Standards for Asbestos, 40 CFR Part 61, Subpart M.**

Fugitive dust from site preparation and from wind erosion will cause minor short-term air quality impacts during the construction period. To reduce any adverse effects, cleared and disturbed areas will be periodically sprayed with water where appropriate after clearing. After completion of construction, all project areas will be grassed, mulched, or paved depending on land use, thus containing fugitive dust. The site is currently vacant and thus there are no structures on site that will require demolition.

- B. Specify structural or operational measures that will be implemented by the development to minimize air quality impacts (e.g., road widening and other traffic flow improvements on existing roadways, etc.). Any roadway improvements identified here should be consistent with those utilized in Question 21, Transportation.**

The Amendment Site is fortunate to be surrounded by regional roadway network improvements that are programmed and/or planned in TIP 2016 and LRTP 2040 to add regional roadway network capacity to Florida's Turnpike, Interstate-75 and SR-826. To compliment the regional network improvements, the development will provide additional roadway and interchange improvements to improve access to the site and to address network capacity on adjacent local roadways to accommodate project impacts. A preliminary listing of the roadway and interchange improvements which are currently under review to provide access to the amendment site are outlined below. The final determination of required roadway and interchange improvements will be made during the agency review and approval process for the CDMP Amendment Transportation Analysis.

Site Access Improvements:

- New Turnpike Interchange at HEFT and NW 170 Street
- Construction of NW 170 Street between HEFT and NW 97 Avenue
- Construction of NW 178 Street between NW 102 Avenue and I-75
- Construction of NW 97 Avenue from NW 154 Street to NW 178 Street
- Construction of NW 102 Avenue from NW 170 Street or NW 178 Street to NW 186 Street
- Modified and Expanded Interchange at I-75 and NW 186 Street / Miami Gardens Drive

- C. Complete Table 22-1 for all substantially impacted intersections within the study area, as defined in Map J, and all parking facilities associated with the project. Using the guidance supplied or approved by the Florida Department of Environmental Regulation, determine if detailed air quality modeling for carbon monoxide (CO) is to be completed for any of the facilities listed in the table.**

Detailed information on impacted intersections and surface and structured parking areas will be provided during the zoning and/or site plan approval and permitting process (if requested and/or required by reviewing agencies). After the CDMP Amendment Transportation Analysis has been reviewed and determined to be sufficient, the Applicant will meet with DERM and FDEP to identify applicable guidelines and to identify those study intersections and parking facilities which are anticipated to be substantially impacted by project traffic. As part of the DRI process, FDEP guidelines require that the following be considered for air quality modeling:

- LOS E and F intersections impacted by 5% or more of project traffic;
- Surface parking areas accommodating 1500 vehicle trips per hour; or
- Parking garages accommodating 750 vehicle trips per hour.

D. If detailed modeling is required, estimate the worst case one-hour and eight-hour CO concentrations expected for each phase through buildout for comparison with the state and federal ambient air quality standards. Utilize methodology supplied or approved by the Florida Department of Environmental Regulation for making such estimates. Submit all air quality modeling input and output data along with associated calculations to support the modeling and explain any deviations from guidance. Provide drawings of site geometry and coordinate information for each area modeled. Show the location of the sources and receptor sites. Modeling assumptions should consider federal, state, and local government programmed link and intersection improvements with respect to project phasing. Any roadway improvements utilized in the model should be consistent with those used in Question 21, Transportation. Provide verification of any assumptions in the modeling which consider such programmed improvements. It is recommended that air quality analyses be completed concurrently and in conjunction with the traffic analyses for the project.

If applicable, this information will be provided after the CDMP Amendment Transportation Analysis has been reviewed and determined to be sufficient, and the Applicant has met with DERM and FDEP to determine which intersections and parking facilities need to be modeled and have established parameters for the carbon monoxide analysis.

E. If initial detailed modeling shows projected exceedance(s) of ambient air quality standards, identify appropriate mitigation measures and provide assurances that appropriate mitigating measures will be employed so as to maintain compliance with air quality standards. Submit further modeling demonstrating the adequacy of such measures.

This information will be provided after the CDMP Amendment Transportation Analysis has been reviewed and determined to be sufficient, and the modeling (if applicable) has been completed.

Question 23 – Hurricane Preparedness

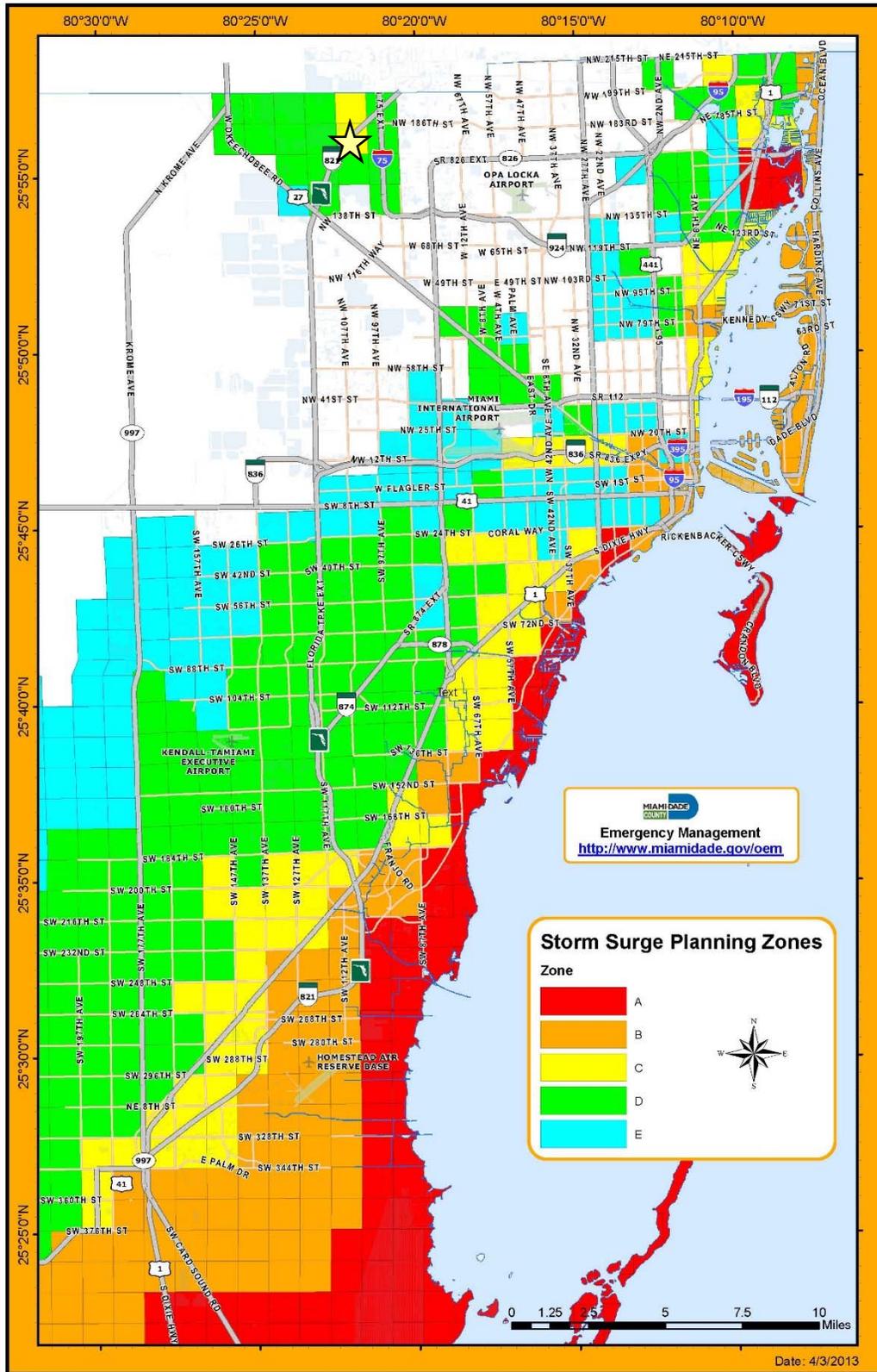
- A. 1. Identify any residential development proposed within the hurricane vulnerability zone delineated in the applicable regional hurricane evacuation study, regional public hurricane shelter study or adopted county peacetime emergency plan. If so, delineate the proposed development's location on the appropriate county and/or regional hurricane evacuation map and respond to questions B.(1) and B.(2) below. Proposed mobile home and park trailer developments should answer question B.(1), regardless of location, or answer questions B.(1) and B.(2) below, if proposed within the hurricane vulnerability zone or the high hazard hurricane evacuation area.**

In April of 2013, the Miami-Dade County Department of Emergency Management updated their Hurricane Evacuation Map which provides Hurricane Storm Surge Planning Zones across Miami-Dade County (categorized as **Planning Zones A through E**) which are depicted on attached **Exhibit 23-1A**. The Hurricane Storm Surge Planning Zones are used to identify the risk of storm surge throughout the entire county, and are based upon an updated generation of the SLOSH Model. As a storm is approaching, Miami-Dade County Emergency Management will identify which areas should evacuate for that particular storm.

A description of the Storm Surge Planning Zones are outlined below.

- **Zone A** is at greatest risk for storm surge for Category 1 and higher storms.
- **Zone B** is at greatest risk for storm surge for Category 2 and higher storms.
- **Zone C** is at greatest risk for storm surge for Category 3 and higher storms.
- **Zone D** is at greatest risk for storm surge for Category 4 and higher storms.
- **Zone E** is at greatest risk for storm surge from Category 5 storms.

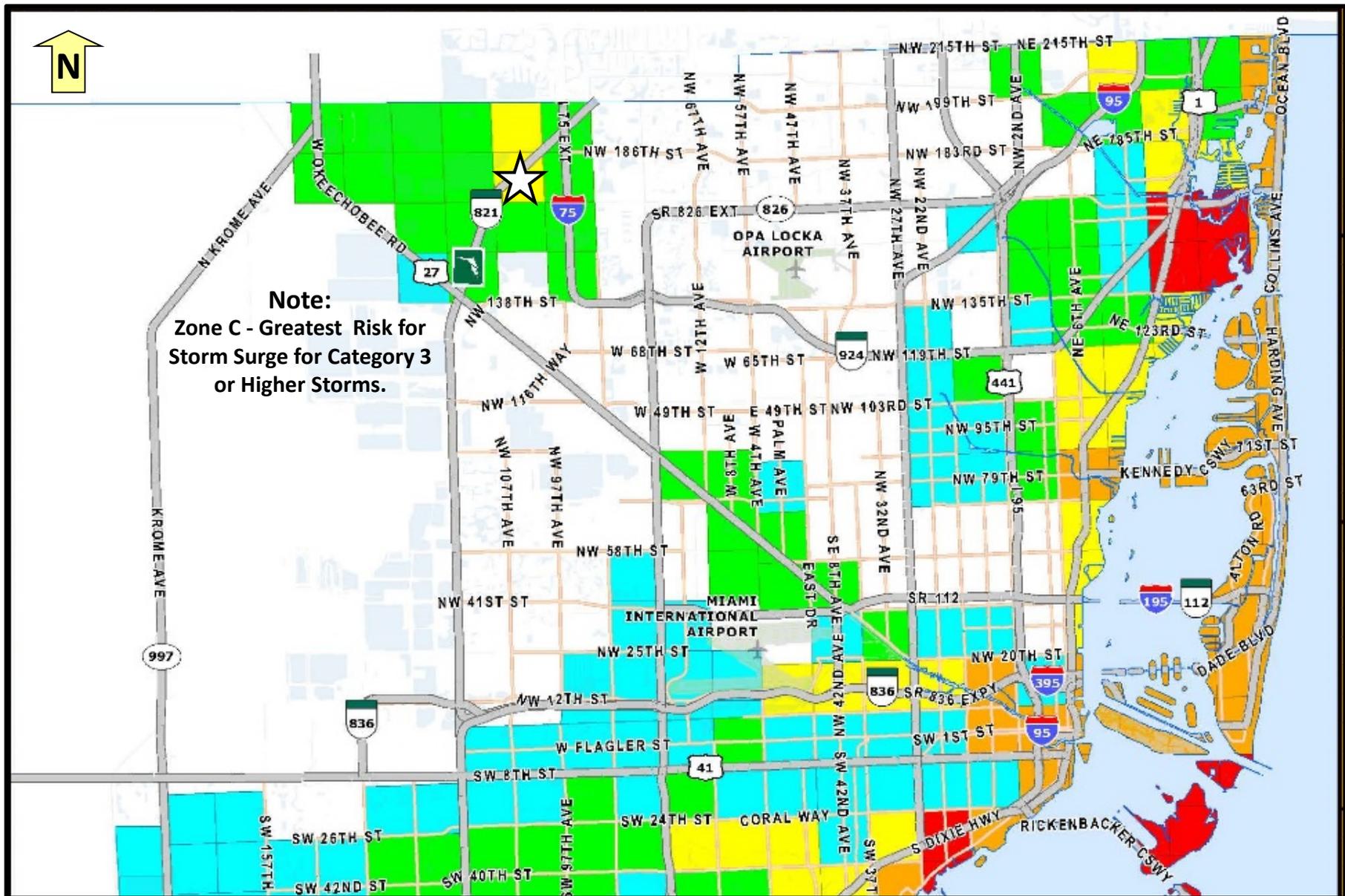
Exhibit 23-1B has been prepared to illustrate the Hurricane Storm Surge Planning Zones for the northern portion of the County which includes the CDMP Amendment Site for **The Graham Companies**. The Amendment project area lies generally east of the HEFT, west of I-75, north of NW 170 Street and south of NW 186 Street. This exhibit identifies that the CDMP Amendment Site is located within Storm Surge Planning **Zone C** which is at risk for storm surge under Category 3 storms or higher. The CDMP Amendment property is currently unimproved and has not yet been developed or graded to meet current flood elevation standards. When improvements are provided on-site and the property has addressed all flood elevation standards, the site should be able to qualify for Storm Surge Planning **Zone D** consistent with adjacent properties.



The Graham Companies – Amendment Site Location
Zone C

Exhibit 23-1A
Miami-Dade County Storm Surge Planning Zones
The Graham Companies

Source: Cathy Sweetapple & Associates



★ **The Graham Companies – Amendment Site Location – Zone C**
 Note – Northern View of the Miami-Dade Emergency Management Storm Surge Planning Zones Map – Dated 4-3-2013

Exhibit 23-1B
 Miami-Dade County Storm Surge Planning Zones
 The Graham Companies

Source: Cathy Sweetapple & Associates

- A. 2. Identify any hotel/motel or recreational vehicle/travel trailer development proposed within the high hazard hurricane evacuation area delineated in the applicable regional hurricane evacuation study, regional public hurricane shelter study, or adopted county peacetime emergency plan. If present, delineate the proposed development's location on the appropriate county or regional hurricane evacuation map and answer questions B.(1) and B.(2) below.**

The CDMP Amendment for the Graham Companies may include up to 1600 future hotel rooms as part of the retail or business park uses to complement the adjacent neighboring development. None of these uses would be located in a “high hazard hurricane evacuation area”.

- A. 3. Identify whether the proposed development is location in a designated special hurricane preparedness district.**

The CDMP Amendment for the Graham Companies is not located in a designated special hurricane preparedness district.

- B. 1. For each phase of the development, determine the development's public hurricane shelter space requirements based on the behavioral assumptions identified in the applicable regional study or county plan. Identify the existing public hurricane shelter space capacity during the one hundred year or category three hurricane event within the county where the development is being proposed and indicate whether the county has a deficit or surplus of public hurricane shelter space during the one hundred year or category three hurricane event.**

Based upon the information provided in the **2014 Statewide Emergency Shelter Plan** dated January 31, 2014, the hurricane evacuation center capacity for Miami-Dade County consists of **76,470** public shelter spaces with a demand for **61,894** shelter spaces and a surplus of **14,576** Shelter Spaces as outlined in **Table B.1.** below. The Shelter Capacity includes accommodations for Standard Shelter Space and Special Needs Shelter Space also outlined in **Table B.1.** below.

Table B.1.

Shelter Space	Capacity	Demand	Surplus
Standard Shelter Space	73,162	59,177	13,985
Special Needs Shelter Space	3,308	2,717	591
Total	76,470	61,894	14,576
CDMP Amendment Demand		1,981	-1981
Total with Amendment		63,875	12,595 – Updated Surplus

The Applicant has estimated the public shelter demand for **2,000 dwelling units and 1600 hotel rooms** as presented in **Tables 23-1 and 23-2.** The analysis demonstrates a potential demand for **1981 shelter spaces** (as outlined in **Table 23-2**) when 80% of the proposed dwelling units and 70% of the proposed hotel rooms seek shelter in Miami-Dade County for a Category 3 or higher storm. The Applicant has utilized the data and analysis provided in the *Florida Statewide Regional Evacuation Studies Program* which includes the participation rates for Category 3 Storms, the persons per dwelling unit, the percent of evacuees to local public shelters, the persons per hotel room, the updated seasonal occupancy of hotel rooms during hurricane season and the updated persons per hotel room to develop the estimated shelter demand. Given the peak demand results from **Table 23-2** that forecasts a demand for **1981** shelter spaces from the proposed 2000 dwelling units and the potential for 1600 hotel rooms for the Graham Amendment Site, Miami-Dade County will still have a **12,595** public shelter space surplus under Evacuation Level C.

TABLE 23-1

**The Graham Companies - CDMP Amendment
HURRICANE EVACUATION TRAFFIC ANALYSIS - 2000 DU for Category 3 Analysis**

Evacuation Vehicles Generated by Project								
Dwelling Units	2000	residential du's						
Hotel Units	1600	hotel rooms						
Evacuation Participation Rate for Category 3	60%	of units		<i>Source: Table IIIB-1, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Out of County Evacuation Rates	50%	of units		<i>Source: Table IIIB-2, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Vehicles per Dwelling Unit	1.65	vehicles per permanent unit		<i>Source: Table MDTAZ, Volume 1-11 South Florida</i>				
Vehicles per Hotel Unit	1.05	vehicles per occupied seasonal unit		<i>Source: Table MDTAZ, Volume 1-11 South Florida</i>				
Evacuation Vehicle Usage Rate	70%	of permanent unit vehicles		<i>Source: Table IIIB-3, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
	100%	of seasonal unit vehicles						
Seasonal Unit Occupancy Levels	75%	occupancy during Hurricane Season		<i>Source: Table MDTAZ, Volume 1-11 South Florida</i>				
Evacuation Vehicles Generated by Project		Category 3						
		2646	Evac Vehicles	[DU*60%*1.65 veh/du*70% veh usage] + [Rooms*1.05 veh/rm*100% veh usage*75% seasonal occupancy]				
Public Shelter Demand Generated by Project								
People per Unit	2.86	people per permanent unit		<i>Source: Table MDTAZ, Volume 1-11 South Florida</i>				
	1.46	people per occupied seasonal unit		<i>Source: Table MDTAZ, Volume 1-11 South Florida</i>				
Percent of Evacuees to Local Public Shelter	5%	of permanent resident evacuees		<i>Source: Table IIIB-4, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Percent of Evacuees to Friend/Relative Refuge	65%	to local homes of friends/relatives		<i>Source: Table IIIB-5, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Percent of Evacuees to Hotel-Motels	20%	to hotel-motels		<i>Source: Table IIIB-6, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Public Shelter Demand Generated by Project		Category 3						
		1924	Shelter Demand	[DU*60%*2.86 per/du*5% to shelter] + [Rooms*75% season occupancy*1.46 per/rm]				
Evacuation Vehicles as Percent of LOS E Directional Service Volume under Category 3								
Designated Evacuation Routes								
	10L FWY HEFT SO Site	10L FWY HEFT NO Site	10L FWY I-75 NO HEFT	10L FWY I-75 SO HEFT	8L FWY Palmetto NO Gratigny	10L FWY Palmetto SO Gratigny	6L FWY Gratigny	
Percent of Evacuation Traffic Using Adjacent Evacuation Road Network	15.00%	25.00%	25.00%	15.00%	5.00%	5.00%	5.00%	0.00%
Evacuation Vehicles by Route	397 vehicles	662 vehicles	662 vehicles	397 vehicles	132 vehicles	132 vehicles	132 vehicles	0 vehicles
Highest Hourly Contribution of Evacuation Traffic as a % of Total Evacuation Traffic Based on Medium Behavioral Response Curve	30.00%	30.00%	30.00%	30.00%	30.00%	30.00%	30.00%	0.00%
Highest Hourly Contribution of Evacuation Traffic by Route from Project	119 vehicles	198 vehicles	198 vehicles	119 vehicles	40 vehicles	40 vehicles	40 vehicles	0 vehicles
Maximum Directional LOS E Service Volume per Evacuation Route	10,360 veh per hour	10,360 veh per hour	10,360 veh per hour	10,360 veh per hour	8,220 veh per hour	10,360 veh per hour	6,080 veh per hour	1860 veh per hour
Maximum Hourly Evacuation Vehicles as a % of LOS E Hourly Directional Service Volume	1.15%	1.92%	1.92%	1.15%	0.48%	0.38%	0.65%	0.00%

TABLE 23-2

The Graham Companies - CDMP Amendment

HURRICANE EVACUATION TRAFFIC ANALYSIS - 2000 DU for Category 3 Analysis

Evacuation Vehicles Generated by Project								
Dwelling Units	2000	residential du's						
Hotel Units	1600	hotel rooms						
Evacuation Participation Rate for Category 3	80%	of units		<i>Source : Table IIIB-1, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Out of County Evacuation Rates	50%	of units		<i>Source : Table IIIB-2, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Vehicles per Dwelling Unit	1.65	vehicles per permanent unit		<i>Source : Table MDTAZ, Volume 1-11 South Florida</i>				
Vehicles per Hotel Unit	1.05	vehicles per occupied seasonal unit		<i>Source : Table MDTAZ, Volume 1-11 South Florida</i>				
Evacuation Vehicle Usage Rate	70%	of permanent unit vehicles		<i>Source : Table IIIB-3, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
	100%	of seasonal unit vehicles						
Seasonal Unit Occupancy Levels	75%	occupancy during Hurricane Season		<i>Source : Table MDTAZ, Volume 1-11 South Florida</i>				
Evacuation Vehicles Generated by Project		Category 3						
		3108	Evac Vehicles	[DU*80%*1.65 veh/du*70% veh usage] + [Rooms*1.05 veh/rm*100% veh usage*75% seasonal occupancy]				
Public Shelter Demand Generated by Project								
People per Unit	2.86	people per permanent unit		<i>Source : Table MDTAZ, Volume 1-11 South Florida</i>				
	1.46	people per occupied seasonal unit		<i>Source : Table MDTAZ, Volume 1-11 South Florida</i>				
Percent of Evacuees to Local Public Shelter	5%	of permanent resident evacuees		<i>Source : Table IIIB-4, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Percent of Evacuees to Friend/Relative Refuge	65%	to local homes of friends/relatives		<i>Source : Table IIIB-5, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Percent of Evacuees to Hotel-Motels	20%	to hotel-motels		<i>Source : Table IIIB-6, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions</i>				
Public Shelter Demand Generated by Project		Category 3						
		1981	Shelter Demand	[DU*80%*2.86 per/du*5% to shelter] + [Rooms*75% season occupancy*1.46 per/rm]				
Evacuation Vehicles as Percent of LOS E Directional Service Volume under Category 3								
Designated Evacuation Routes								
	10L FWY HEFT SO Site	10L FWY HEFT NO Site	10L FWY I-75 NO HEFT	10L FWY I-75 SO HEFT	8L FWY Palmetto NO Gratigny	10L FWY Palmetto SO Gratigny	6L FWY Gratigny	
Percent of Evacuation Traffic Using Adjacent Evacuation Road Network	15.00%	25.00%	25.00%	15.00%	5.00%	5.00%	5.00%	0.00%
Evacuation Vehicles by Route	466 vehicles	777 vehicles	777 vehicles	466 vehicles	155 vehicles	155 vehicles	155 vehicles	0 vehicles
Highest Hourly Contribution of Evacuation Traffic as a % of Total Evacuation Traffic Based on Medium Behavioral Response Curve	30.00%	30.00%	30.00%	30.00%	30.00%	30.00%	30.00%	0.00%
Highest Hourly Contribution of Evacuation Traffic by Route from Project	140 vehicles	233 vehicles	233 vehicles	140 vehicles	47 vehicles	47 vehicles	47 vehicles	0 vehicles
Maximum Directional LOS E Service Volume per Evacuation Route	10,360 veh per hour	10,360 veh per hour	10,360 veh per hour	10,360 veh per hour	8,220 veh per hour	10,360 veh per hour	6,080 veh per hour	1860 veh per hour
Maximum Hourly Evacuation Vehicles as a % of LOS E Hourly Directional Service Volume	1.35%	2.25%	2.25%	1.35%	0.57%	0.45%	0.77%	0.00%

- B. 2. For each phase of the development, determine the number of evacuating vehicles the development would generate during a hurricane evacuation event based on the transportation and behavioral assumptions identified in the applicable regional study or county plan. Identify the nearest designated hurricane evacuation route and determine what percentage of level of service E hourly directional and maximum service volume the project will utilize.**

Figure 7 from the Transportation Element of the Miami-Dade County CDMP identifies the designated hurricane evacuation routes for the entire County as depicted on **Exhibit 23-2A**. **Exhibit 23-2B** has been prepared to illustrate the hurricane evacuation routes for the northern portion of the County which are located adjacent to the CDMP Amendment Site for **The Graham Companies**. The hurricane evacuation routes adjacent to and serving the Amendment Site include the HEFT, I-75, SR-826, Okeechobee Road and SR-924/Gratigny Parkway.

Tables 23-1 and **23-2** have been prepared to calculate the estimated traffic impact from the residential and hotel traffic (generated by the Amendment Site) that are likely to participate in some form of hurricane evacuation activity based upon the following two scenarios:

Scenario 1 – the evacuation of **60%** of the residential units and **100%** of the hotel trips; and

Scenario 2 – the evacuation of **80%** of the residential units and **100%** of the hotel trips based upon the Miami-Dade County evacuation rates for a Category 3 storm under a Category 3 Evacuation Zone (pursuant to *Table IIIB-1, Volume 1-11 from the Statewide Regional Evacuation Studies Program*).

100% of the occupied hotel rooms were assumed to evacuate under both scenarios. Projected traffic distribution percentages to the designated hurricane evacuation routes are provided on the attached **Exhibit 23-3**. The percentage of project traffic estimated to use these designated evacuation routes at project buildout is provided in **Table 23-1** and **Table 23-2**. Also provided are the calculations of the evacuation project traffic as a percent of the **Level of Service E** hourly directional maximum service volumes, which are illustrated on **Exhibit 23-4**.

Using the socioeconomic and behavioral assumptions from the Statewide Regional Evacuation Study Program, the proposed CDMP Amendment under Scenario 1 will add an estimated **2646** evacuating vehicles to the adjacent roadway network under Evacuation Level C.

Using the socioeconomic and behavioral assumptions from the Statewide Regional Evacuation Study Program, the proposed CDMP Amendment under Scenario 2 will add an estimated **3108** evacuating vehicles to the adjacent roadway network under Evacuation Level C.

The Applicant has utilized the updated participation rates for Category 3 Storms, the updated vehicles per dwelling unit, the updated vehicle usage rate for dwelling units during hurricanes, the updated vehicles per hotel room and the updated seasonal occupancy of hotel rooms during hurricane season to develop the estimate of evacuation vehicles. To calculate the development's maximum **hourly** contribution to the evacuation network, the Applicant has used 30% as the highest hourly percentage of evacuees loading the roadway network based upon the behavioral assumptions from the prior hurricane study for Miami-Dade County.

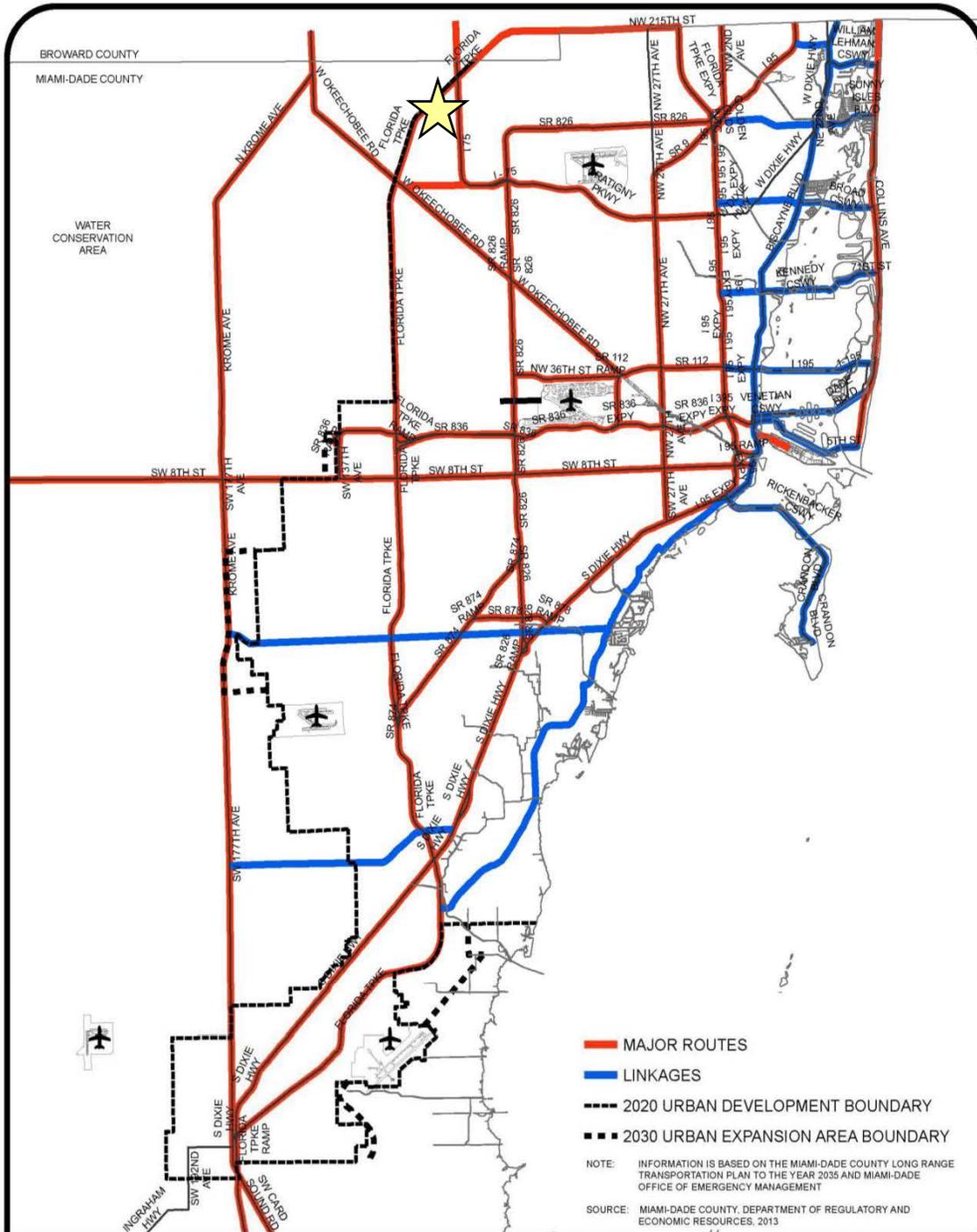
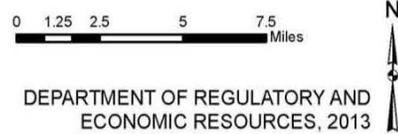


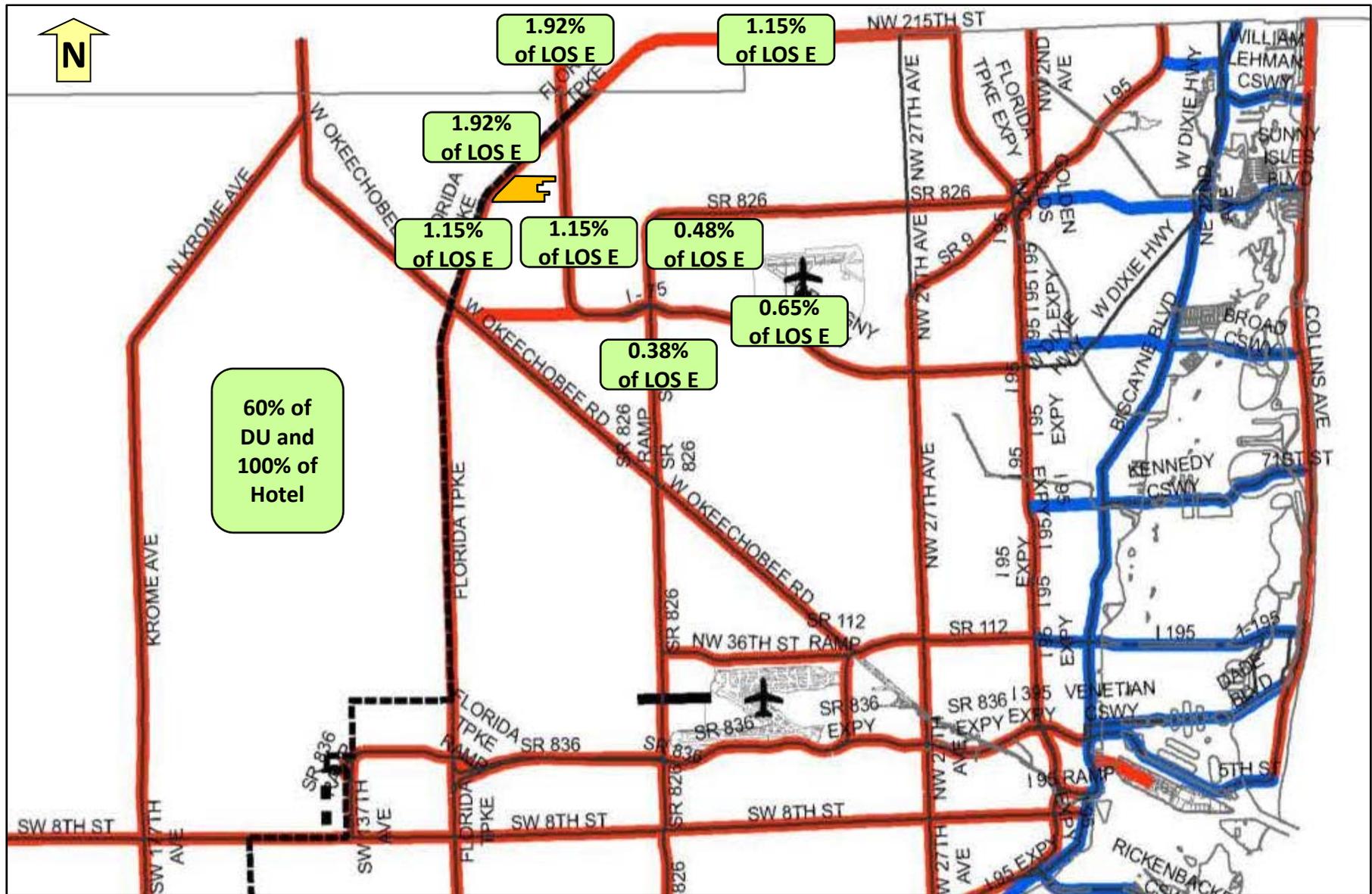
Figure 7
DESIGNATED EVACUATION ROUTES 2030



 The Graham Companies
 Amendment Site Location

II-28

Exhibit 23-2A
 Designated Evacuation Routes
 The Graham Companies

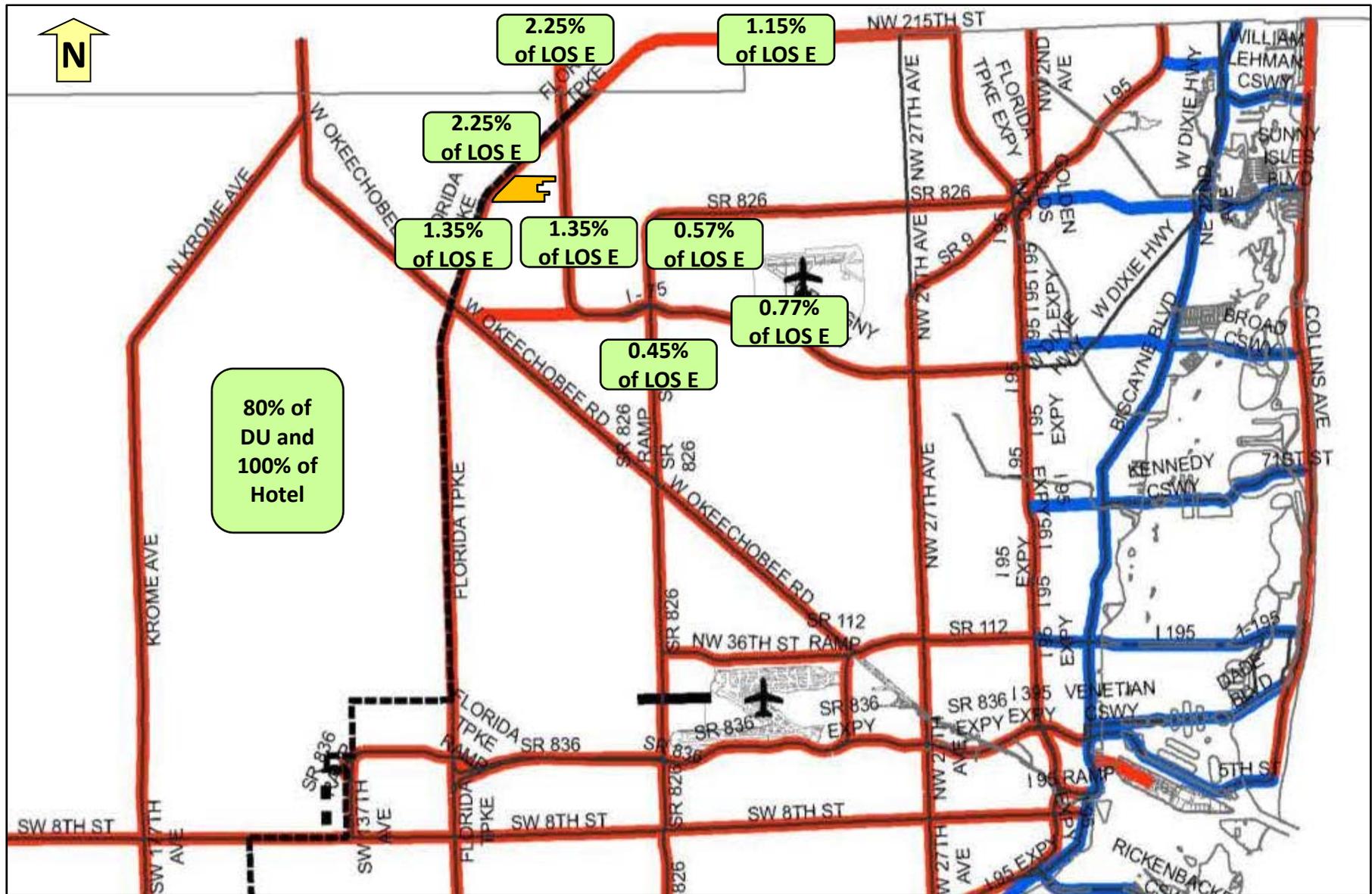


The Graham Companies – Amendment Site Location

XX.X%

Graham Companies Hurricane Evacuation Distribution for Year 2040

Exhibit 23-4
Hurricane Evacuation Distribution for Project Traffic
The Graham Companies



The Graham Companies – Amendment Site Location

XX.X%

Graham Companies Hurricane Evacuation Distribution for Year 2040

Those roadways designated as official evacuation routes (pursuant to Figure 7 of the Transportation Element in the adopted CDMP) were analyzed to determine if the proposed development's evacuation traffic would utilize **25 percent or more** of the evacuation route's LOS E hourly directional maximum service volume (MSV). If the evacuation traffic were to exceed 25% or more of the LOS E directional MSV, it would be found to have a material adverse effect on the local area's evacuation network. **Tables 23-1 and 23-2** provide the calculations to show the maximum hourly evacuation vehicles as a % of the LOS E hourly directional service volume. The evacuation traffic from the CDMP Amendment was found **not to exceed 25 percent or more** of the evacuation route's LOS E hourly directional maximum service volume. See attached **Figures 23-4 and 23-5** to illustrate the CDMP Amendment evacuation traffic as a percent of the LOS E directional maximum service volume.

- Evacuation vehicles assigned to HEFT south of NW 170 Street = 1.35% of the LOS E MSV;
- Evacuation vehicles assigned to HEFT north of NW 170 Street = 2.25% of the LOS E MSV;
- Evacuation vehicles assigned to HEFT east of I-75 = 1.15% of the LOS E MSV;
- Evacuation vehicles assigned to I-75 north of HEFT = 2.25% of the LOS E MSV;
- Evacuation vehicles assigned to I-75 south of HEFT = 1.35% of the LOS E MSV;

The evacuation traffic assignments from the DRI are not anticipated to impact clearance times for Miami-Dade County road segments in the north and northeast part of the county. These segments will meet the overall evacuation clearance times on which the county bases its evacuation decision making. The proposed CDMP Amendment will have little to no impact on the bottlenecks in the other parts of the county.

C. Identify and describe any action(s) or provisions that will be undertaken to mitigate impacts on hurricane preparedness.

Based on the analyses performed in **Tables 23-1 and 23-2** – the CDMP Amendment Evacuation Traffic will not utilize 25 percent or more of the evacuation route's LOS E hourly directional maximum service volume and therefore no additional mitigation is required.

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Question 25 – Police and Fire Protection

- A. If police/fire services, facilities or sites will be dedicated or otherwise provided on-site, describe them, specify any conditions of dedication and locate on Map H.**

The police facilities located in the area surrounding the Graham Application Area are:

- Miami-Dade Police Department (MDPD) Northwest District Station – 5975 Miami Lakes Drive, Miami Lakes, FL 33014

The fire facilities located in the area surrounding the Graham Application Area are:

- Miami-Dade Fire Rescue (MDFR) Palm Springs North Station 44 – 7700 NW 186 Street, Miami, FL 33015
- MDFR Miami Lakes West Station 64 – 8205 Commerce Way, Miami, FL
- MDFR Miami Lakes Station 1 – 16699 NW 67 Avenue, Miami Lakes, FL 33014

- B. Provide correspondence from the appropriate providers acknowledging notice of the proposed development and phasing, and indicating whether present facilities and manpower are capable of serving the project or specifying the additional manpower/equipment necessary to serve the development. If the provider is from another jurisdiction, the letter should also identify any non facility related problems in providing said service.**

Exhibit 25-1, Letters to Miami-Dade Police Department and Miami-Dade Fire Rescue Department, address the respective agencies' abilities and commitments to provide police and fire rescue services for the Project.

Exhibit 25-1
LETTERS TO MIAMI-DADE POLICE DEPARTMENT AND MIAMI-DADE
FIRE RESCUE DEPARTMENT

Slavens, Tracy R (MIA - X27642)

From: Hedrick, Keith P. <kphedrick@mdpd.com>
Sent: Wednesday, November 18, 2015 8:47 AM
To: Slavens, Tracy R (MIA - X27642)
Cc: Lauton, Suzanne C.; Rock, Darin
Subject: RE: Graham Properties CDMP Amendment Application Analysis

Ms. Slavens,

We received your request for evaluation on the impact of police services for the Graham Properties and American Dream Mall (ADM) projects yesterday. As we discussed, these projects are very large in scale and require careful planning and analysis from all involved. The MDPD will evaluate the impact on police service to the community, and provide a response. However, at this time, we are unable to provide specific information regarding the impact on police services. We look forward to working with the Applicant and the ADM in the future development of this area.

We look forward to meeting with you and the applicant in the near future to discuss these matters.

- The location of our existing stations/substations near the projects is the **Northwest District located at 5975 Miami Lakes Drive East.**

Please contact me if I can be of any further assistance,
Keith

Sergeant Keith Hedrick
Miami-Dade Police Department
Office of the Deputy Director
Strategic Planning and Development Section
305-471-3130

From: Tracy.Slavens@hkllaw.com [mailto:Tracy.Slavens@hkllaw.com]
Sent: Tuesday, November 17, 2015 11:18 AM
To: Hedrick, Keith P. <kphedrick@mdpd.com>
Subject: Graham Properties CDMP Amendment Application Analysis

Good morning Sgt. Hedrick,

As a follow up to my request for analysis of police and emergency services in connection with the forthcoming application to amend the Comprehensive Development Master Plan ("CDMP") on behalf of Graham Properties, I would like to clarify what the Applicant is requesting at this time. As noted, Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida's Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County for the development of 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. This property is south of the land that will be developed by American Dream Mall (ADM). The ADM will be a separate but concurrently filed application.

The Applicant is seeking to provide Miami-Dade County Planning with an initial analysis of the impacts of its project. We understand that this is a very early point in the process to make this request but it is our intent start working with MDPD

up front to ensure that services can be provided to the future residents of and workers within the project and as it ties in with ADM. As such, we would appreciate it if you could please provide us with the following:

Location of existing stations/substations.

- Anticipated estimated manpower needed to provide services to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use (please acknowledge that this is only an estimate).
- Whether it may be necessary to establish a police substation within or near the subject property and/or ADM.
- An indication of MDPD's availability to work with the Applicant and the ADM to ensure that sufficient services and infrastructure will be provided for the future development.

Thank you again for calling and for your assistance with this request.

Best,
Tracy

Tracy Slavens | Holland & Knight
Partner
Holland & Knight LLP
701 Brickell Avenue, Suite 3300 | Miami, FL 33131
Phone 305.789.7642 | Fax 305.789.7799
tracy.slavens@hklaw.com | www.hklaw.com

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Question 26 – Recreation and Open Space

- A. Describe the recreational facilities and open space (including acreage) which will be provided on-site. Locate on Map H. Identify which of these areas or facilities will be open to the general public.**

Consistent with the Employment Center overlay, the Applicant proposes a minimum of 10 percent of each land use be devoted to public open spaces such as squares, parks, open spaces and trails. These open spaces will be directly accessible by a pedestrian-friendly street.

- B. Will the development remove from public access lands or waters previously used by residents of the region for hunting, fishing, boating or other recreation uses? Specify.**

No, the Project will not remove from public access lands or waters previously used by residents of the region for hunting, fishing, boating or other recreation uses.

- C. Will parks and open space be dedicated to the city or county? If not, who will maintain the facilities?**

The Applicant is planning for the establishment of numerous public and community-based open spaces and recreational areas. Any privately owned parks or open space will be maintained by a property owner's association or a similar entity.

- D. Please describe how the proposed recreation and open space plan is consistent with local and regional policies.**

The CDMP Parks, Recreation and Open Space Element Policy 2A requires a Level of Service (LOS) standard of 2.75 acres of local recreation open space per 1,000 residents. The Project seeks to develop up to 2,000 multi-family rental housing units. Based on the 2013 ASC 5-Year Estimates the average number of people per household in MSA 3.1 is 2.71 people per household. The Project needs to provide approximately 15 acres of recreation open space to be consistent with the adopted Level of Service Standard. However, as noted above, consistent with the Employment Center overlay the Project will exceed the LOS standard and will provide a minimum of 10 percent of each land use to be devoted to public open spaces such as squares, parks, open spaces and trails.

- E. Does the project have the potential for impacting a recreation trail designated pursuant to Chapter 260, F.S., and Chapter 16D-7, F.A.C.? If so, describe the potential impact.**

No, the Project does not have the potential for impacting a recreation trail designated pursuant to Chapter 260, F.S., and Chapter 16D-7, F.A.C.

Question 27 – Education

- A. If the development contains residential units, estimate the number of school age children expected to reside in the development. Use class breakdowns appropriate to the area in which the development is located (specify on chart below).**

Based on a concurrency analysis prepared by the Miami-Dade County Public Schools (MDCPS) on November 16, 2015, which is attached as **Exhibit 27-1, Letter from Miami Dade County Public Schools**, the 2,000 multi-family residential units proposed by the Applicant are estimated to generate a total of 671 school age children; 291 elementary school, 187 middle school, and 193 senior high school students. The class breakdown of this distribution is provided in Table 27-1 below:

TABLE 27-1 Number of School Age Children			
2,000 multi-family units	Elementary	Middle	Senior High
TOTAL NUMBER OF STUDENTS: 671	291	187	193

There are 11 schools that would currently serve the proposed development, based on attendance boundaries. These include the following schools:

- Spanish Lake Elementary
- Bob Graham Education Center
- Palm Springs North Elementary
- Joella C. Good Elementary
- Hialeah Gardens Elementary
- Lawton Chiles Middle
- Barbara Goleman Senior

The current enrollment capacity for each of these schools is provided in **Exhibit 27-1, Letter from Miami Dade County Public Schools**. The capacity analysis prepared by MDCPS indicated a sufficient supply of available student stations to accommodate the new student demand at all grade levels. This capacity analysis is considered a snapshot in time and may change as enrollment fluctuates.

¹ Includes an impact reduction of 22.36% in student station for charter and magnet school (schools of choice) attendance per MDCPS.

B. Will school facilities or sites be dedicated or otherwise provided on the site?

The Applicant does not intend to dedicate a school site within the Property. However, MDCPS will receive impact fees from the Project in the estimated amount of \$3,060,000.00, as detailed in **Table 27-2, Estimated School Impact Fees** below. It is the desire of both the Applicant and MDCPS to utilize the impact fees collected in connection with the proposed development to improve the public school facilities in the surrounding area.

Units	Average Square Footage	Fees Generated
2,000 multi-family units	1,000	\$3,060,000.00
Total Impact Fees		\$3,060,000.00

Note: Based on current MDCPS school impact fee formula (2015) of # units x (square footage x \$0.918 + \$612.00).

C. Attach a letter from the appropriate school board, acknowledging receipt of the estimated school age population information in (A) above, and providing a statement of what capital improvement adjustments would be necessary to accommodate these students.

Exhibit 27-1, Letter from Miami Dade County Public Schools, provides the student station capacity analysis by school facility and grade level.

Exhibit 27-1
LETTER FROM MIAMI DADE COUNTY PUBLIC SCHOOLS

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Superintendent of Schools
Alberto M. Carvalho

Miami-Dade County School Board
Perla Tabares Hantman, Chair
Dr. Lawrence S. Feldman, Vice Chair
Dr. Dorothy Bendross-Mindingall
Susie V. Castillo
Dr. Wilbert "Tee" Holloway
Dr. Martin Karp
Lubby Navarro
Dr. Marta Pérez
Raquel A. Regalado

November 16, 2015

VIA ELECTRONIC MAIL

Ms. Tracy Slavens, Esquire
Holland & Knight
701 Brickell Avenue, Suite 3000
Miami, Florida 33131
tracy.slavens@hklaw.com

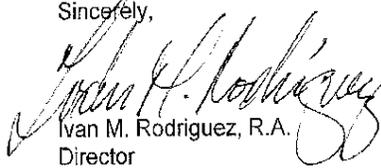
**RE: PUBLIC SCHOOL CONCURRENCY - INFORMATIONAL LETTER
THE GRAHAM COMPANIES., C/O TRACY SLAVENS
LOCATED NORTH OF NW 170 STREET AND THEORETICAL NW 107 AVENUE
IA3015111201384 – FOLIO Nos.: 3020080010490, 3020090010240**

Dear Applicant:

Pursuant to State Statutes and the Interlocal Agreements for Public School Facility Planning in Miami-Dade County, the above-referenced application was reviewed for compliance with Public School Concurrency. Accordingly, enclosed please find the School District's Preliminary Concurrency Analysis (Schools Planning Level Review) for informational purposes only.

As noted in the Preliminary Concurrency Analysis (Schools Planning Level Review), the proposed development would yield a maximum residential density of 2,000 multifamily units, which generate 671 students; 291 elementary, 187 middle and 193 senior high students. At this time, all school levels have sufficient capacity available to serve the application. 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. As such, this analysis does not constitute a Public School Concurrency approval.

Sincerely,



Ivan M. Rodriguez, R.A.
Director

IMR:ir

L-257

Enclosure

cc: Ms. Ana Rijo-Conde, AICP
Mr. Michael A. Levine
Ms. Vivian G. Villaamil
Miami-Dade County
School Concurrency Master File

Planning, Design & Sustainability

Ms. Ana Rijo-Conde, Deputy Chief Facilities & Eco-Sustainability Officer • 1450 N.E. 2nd Ave. • Suite 525 • Miami, FL 33132
305-995-7285 • 305-995-4760 (FAX) • arijo@dadeschools.net



Miami-Dade County Public Schools

Concurrency Management System Preliminary Concurrency Analysis

MDCPS Application Number: IA3015111201384 Local Government (LG): Miami-Dade
 Date Application Received: 11/12/2015 11:13:01 AM LG Application Number: Informational Letter
 Type of Application: Information Application Sub Type: Public
 Applicant's Name: The Graham Companies, c/o Tracy Slavens, Holland
 Address/Location: 701 Brickell Avenue, Suite 3300, Miami, FL 33131
 Master Folio Number: 3020080010490
 Additional Folio Number(s): 3020090010240,

PROPOSED # OF UNITS 2000
 SINGLE-FAMILY DETACHED UNITS: 0
 SINGLE-FAMILY ATTACHED UNITS: 0
 MULTIFAMILY UNITS: 2000

CONCURRENCY SERVICE AREA SCHOOLS

Address	School Name	Current	Proposed	Impact	Capacity	Notes
2191	SPANISH LAKE ELEMENTARY	-31	291	0	NO	Current CSA
2191	SPANISH LAKE ELEMENTARY	0	291	0	NO	Current CSA Five Year Plan
6161	LAWTON CHILES MIDDLE	325	187	187	YES	Current CSA
7751	BARBARA GOLEMAN SENIOR	1039	193	193	YES	Current CSA

ADJACENT SERVICE AREA SCHOOLS

Address	School Name	Current	Proposed	Impact	Capacity	Notes
91	BOB GRAHAM EDUCATION CENTER (ELEM COMP)	7	291	7	NO	Adjacent CSA
4281	PALM SPRINGS NORTH ELEMENTARY	-4	284	0	NO	Adjacent CSA
2181	JOELLA C GOOD ELEMENTARY	-19	284	0	NO	Adjacent CSA
2111	HIALEAH GARDENS ELEMENTARY	-22	284	0	NO	Adjacent CSA
91	BOB GRAHAM EDUCATION CENTER (ELEM COMP)	341	284	284	YES	Adjacent CSA Five Year Plan

*An Impact reduction of 22.36% included for charter and magnet schools (Schools of Choice).

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

1450 NE 2 Avenue, Room 525, Miami, Florida 33132 / 305-995-7634 / 305-995-4760 fax / concurrency@dadeschools.net

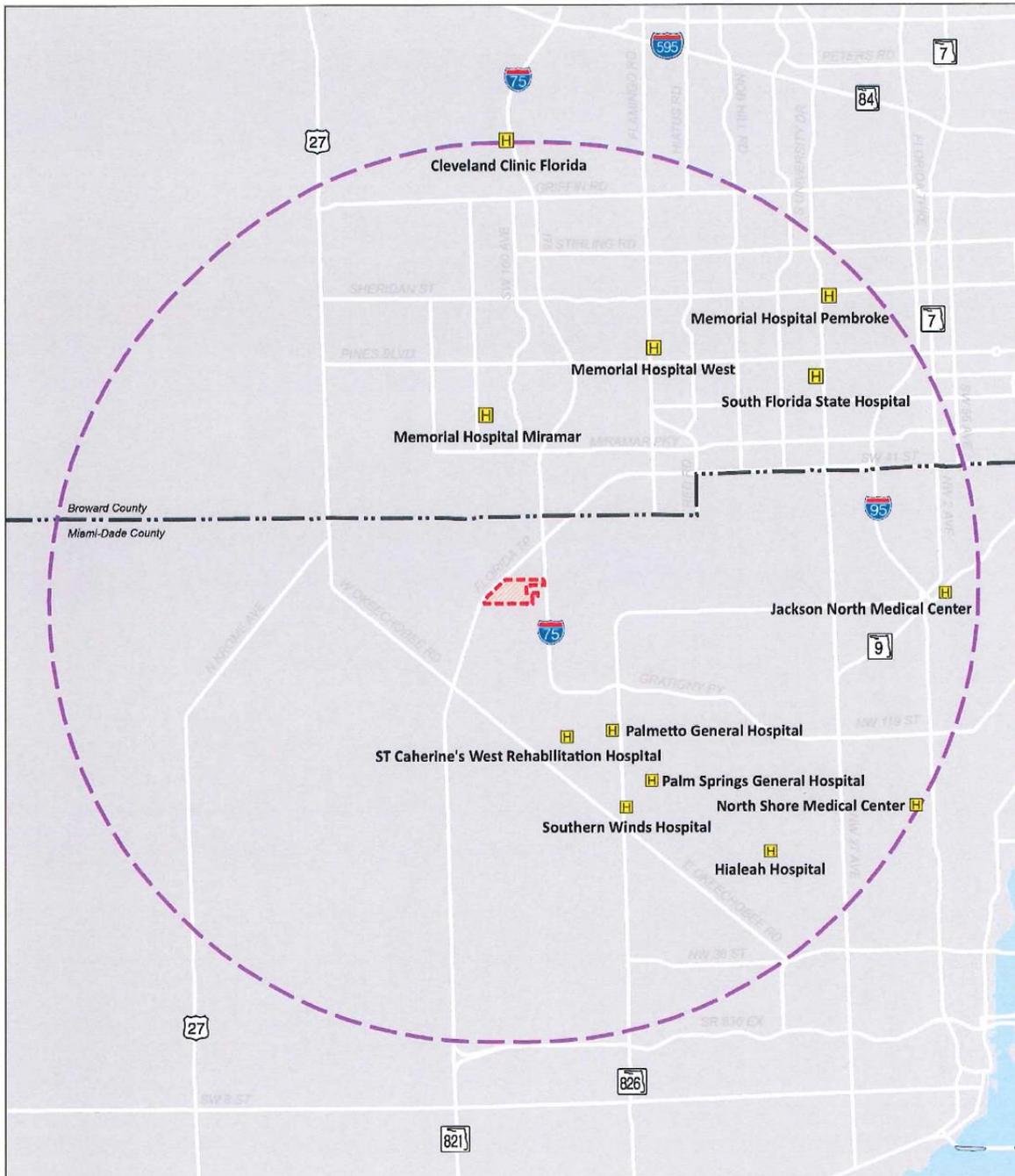
Question 28 – Health Care

- A. Describe the health care services and facilities that will be required to meet the health needs generated by this project. Please provide a letter from the various providers acknowledging notice of the proposed development and ability to serve the project.

Twelve hospitals or admitting medical facilities are located within a 10-mile radius of the Project. **Table 28-1**, Hospitals/Medical Facilities within a 10-mile Radius, provides a list of these facilities. **Exhibit 28-1**, Hospitals/Medical Facilities within a 10-mile Radius, depicts these locations.

Table 28-1 Hospital/Medical Facilities within a 10-Mile Radius	
Name	Address
Jackson North Medical Center	160 NW 170 St, North Miami Beach, FL 33169
St. Catherine’s West Rehabilitation Hospital	1050 NE 125 St, North Miami, FL 33161
Palmetto General Hospital	2001 W 68 St, Hialeah, FL 33016
Palm Springs General Hospital	1475 W 49 Pl, Hialeah, FL 33012
North Shore Medical Center	1100 NW 95 St, Miami, FL 33150
Southern Winds Hospital	4225 W 20 Ave, Hialeah, FL 33012
Hialeah Hospital	651 E 25 St, Hialeah, FL 33013
Memorial Hospital Miramar	1901 SW 172 Avenue, Miramar, FL 33029
South Florida State Hospital	800 E Cypress Dr, Pembroke Pines, FL 33025
Memorial Hospital West	703 N Flamingo Rd, Pembroke Pines, FL 33028
Memorial Hospital Pembroke	7800 Sheridan St, Pembroke Pines, FL 33024
Cleveland Clinic Hospital	3100 Cleveland Clinic Blvd, Weston, FL 33331

Emergency medical services are provided by the Miami-Dade Fire Rescue Department. **Exhibit 28-1, Letter to Miami-Dade Fire Rescue Department**, address the agency’s abilities and commitments to provide fire rescue services for the Project.



LEGEND

-  Project Boundary
-  10-Mile Radius
-  Hospitals

Source: Miami-Dade GIS 2015. Adapted by The Curtis Group, 2015
 0 1.5 3 6 Miles

EXHIBIT 28-1
HOSPITALS/MEDICAL FACILITIES WITHIN A 10-MILE RADIUS
 THE GRAHAM COMPANIES

Exhibit 28-2
LETTER TO MIAMI-DADE FIRE RESCUE DEPARTMENT

Holland & Knight

701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Susan Heyer
Associate Administrator
Jackson North Medical Center
160 N.W. 170th Street
North Miami Beach, FL 33169

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Ms. Heyer:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

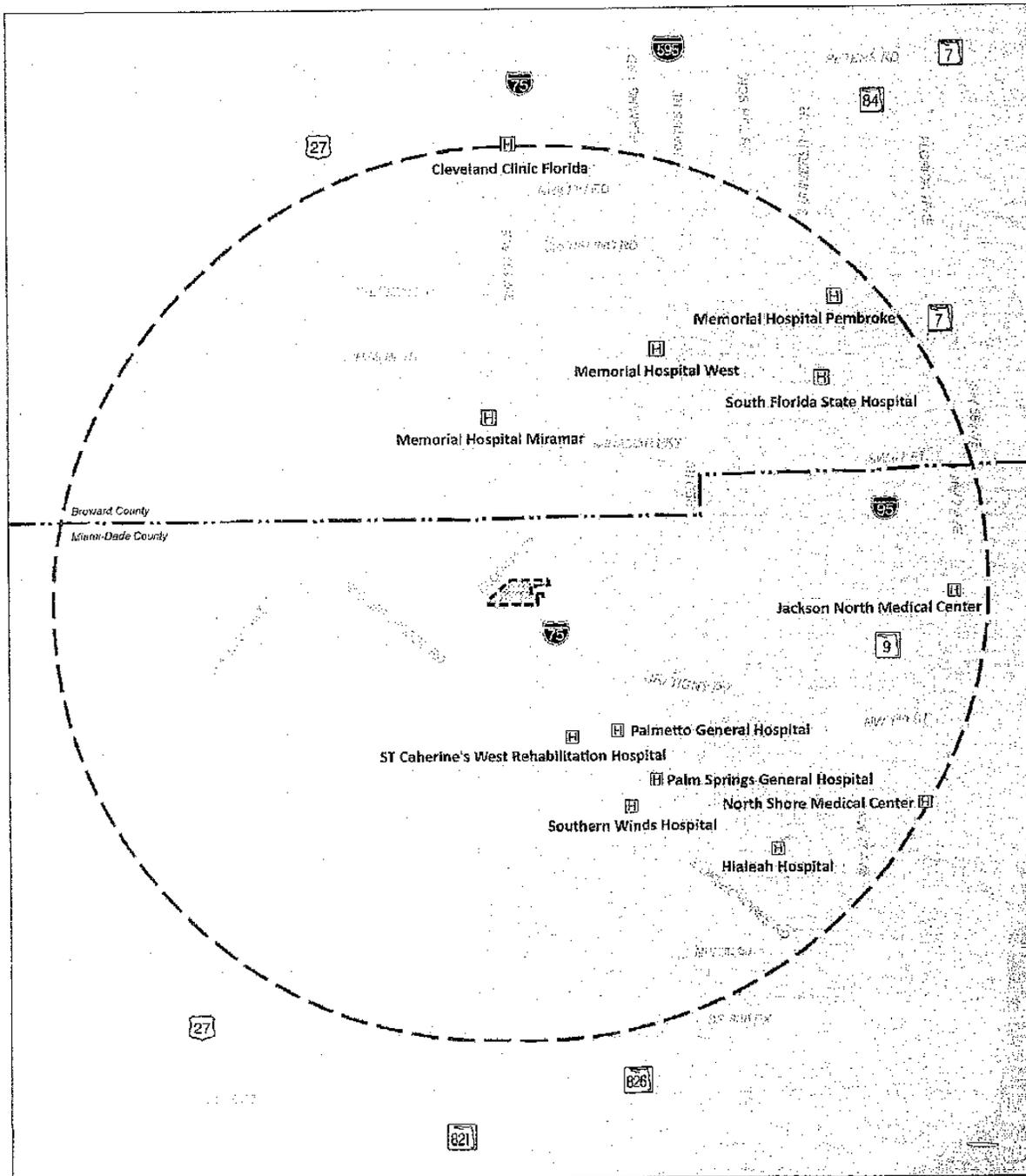
Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
#37913137_v1



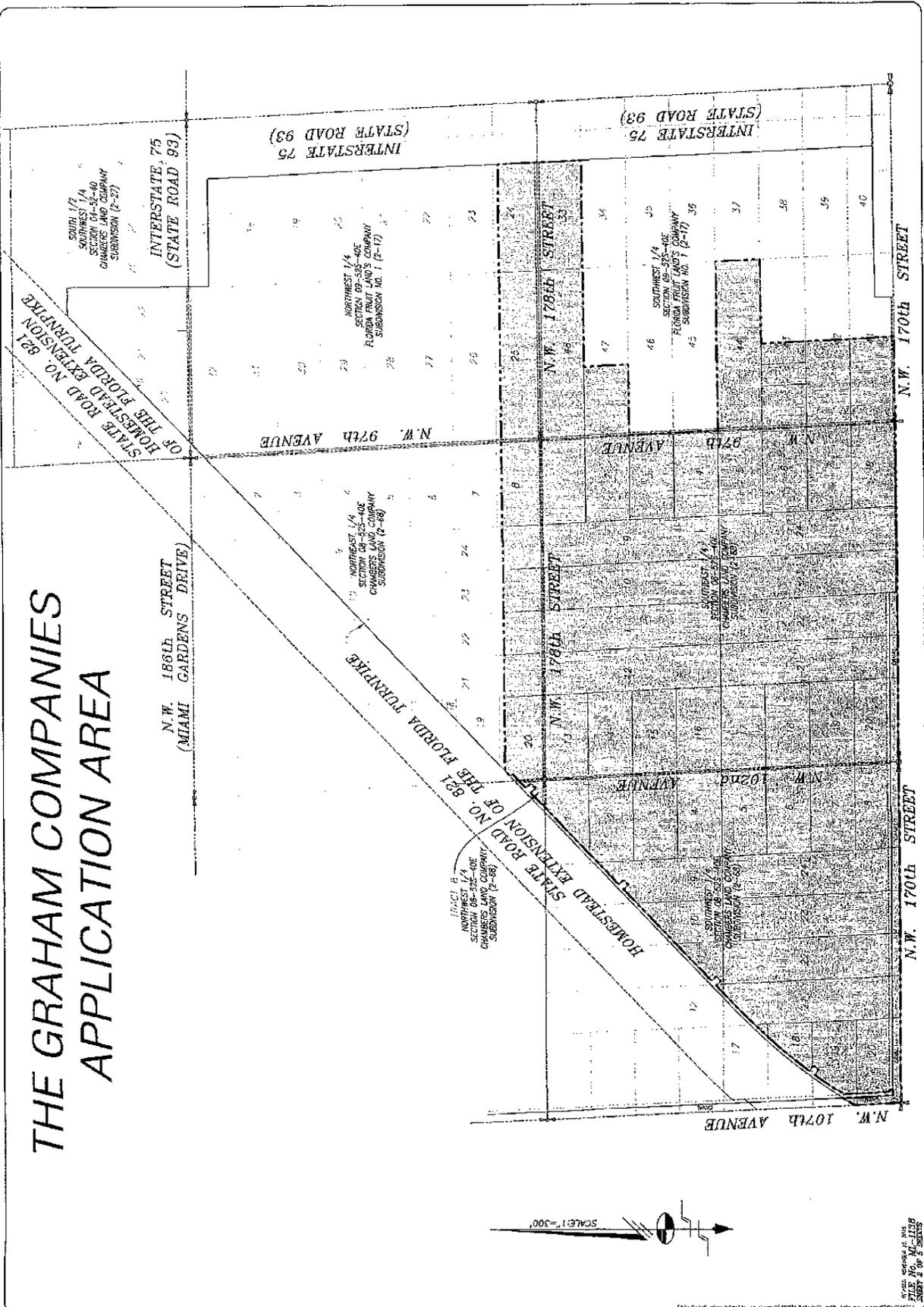
LEGEND

-  Project Boundary
-  10-Mile Radius
-  Hospitals

Source: Miami-Dade GIS 2015. Adapted by The Curis Group, 2015
 0 1.5 3 6 Miles

EXHIBIT 28-1
HOSPITALS/MEDICAL FACILITIES WITHIN A 10-MILE RADIUS
 THE GRAHAM COMPANIES

THE GRAHAM COMPANIES APPLICATION AREA



W. H. HARRIS & SONS
PLAT NO. 11159
STATE OF FLORIDA

Holland & Knight

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Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Joseph M. Catania
President and Chief Executive Officer
St. Catherine's West Rehabilitation
1050 NE 125 St
North Miami, FL 33161

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Mr. Catania:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan ("CDMP") on behalf of Graham Properties, we have been asked by the County's Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida's Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from "Industrial and Office" to "Business and Office" with an "Employment Center" overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

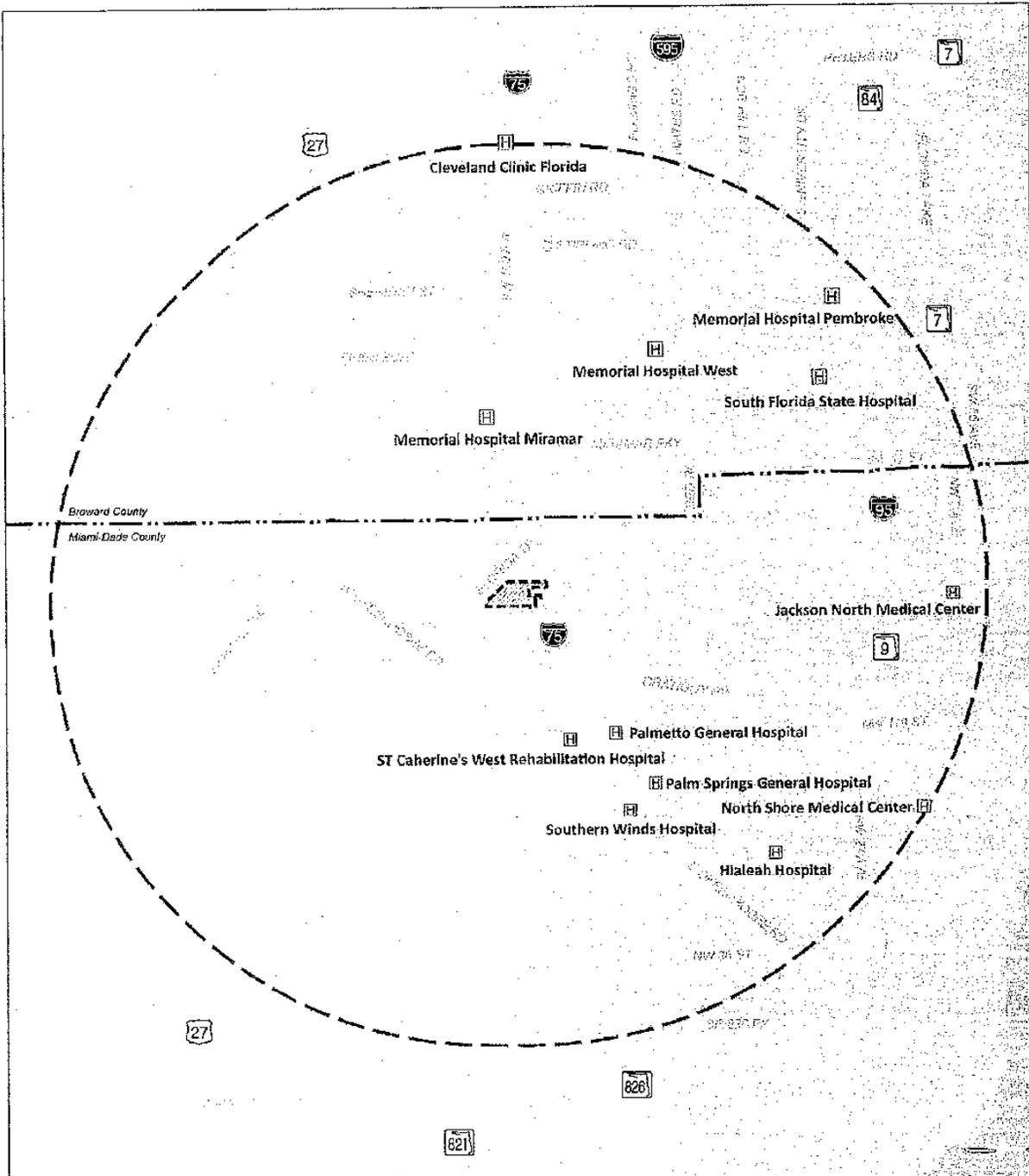
Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
#37913254_v1



LEGEND

-  Project Boundary
-  10-Mile Radius
-  Hospitals

Source: Miami-Dade GIS 2015; Adapted by The Curtis Group, 2015


EXHIBIT 28-1
HOSPITALS/MEDICAL FACILITIES WITHIN A 10-MILE RADIUS
THE GRAHAM COMPANIES

Holland & Knight

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Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Ana Mederos, MBA
Chief Executive Officer
Palmetto General Hospital
2001 W 68 St.,
Hialeah, Florida 33016

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Ms. Mederos:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

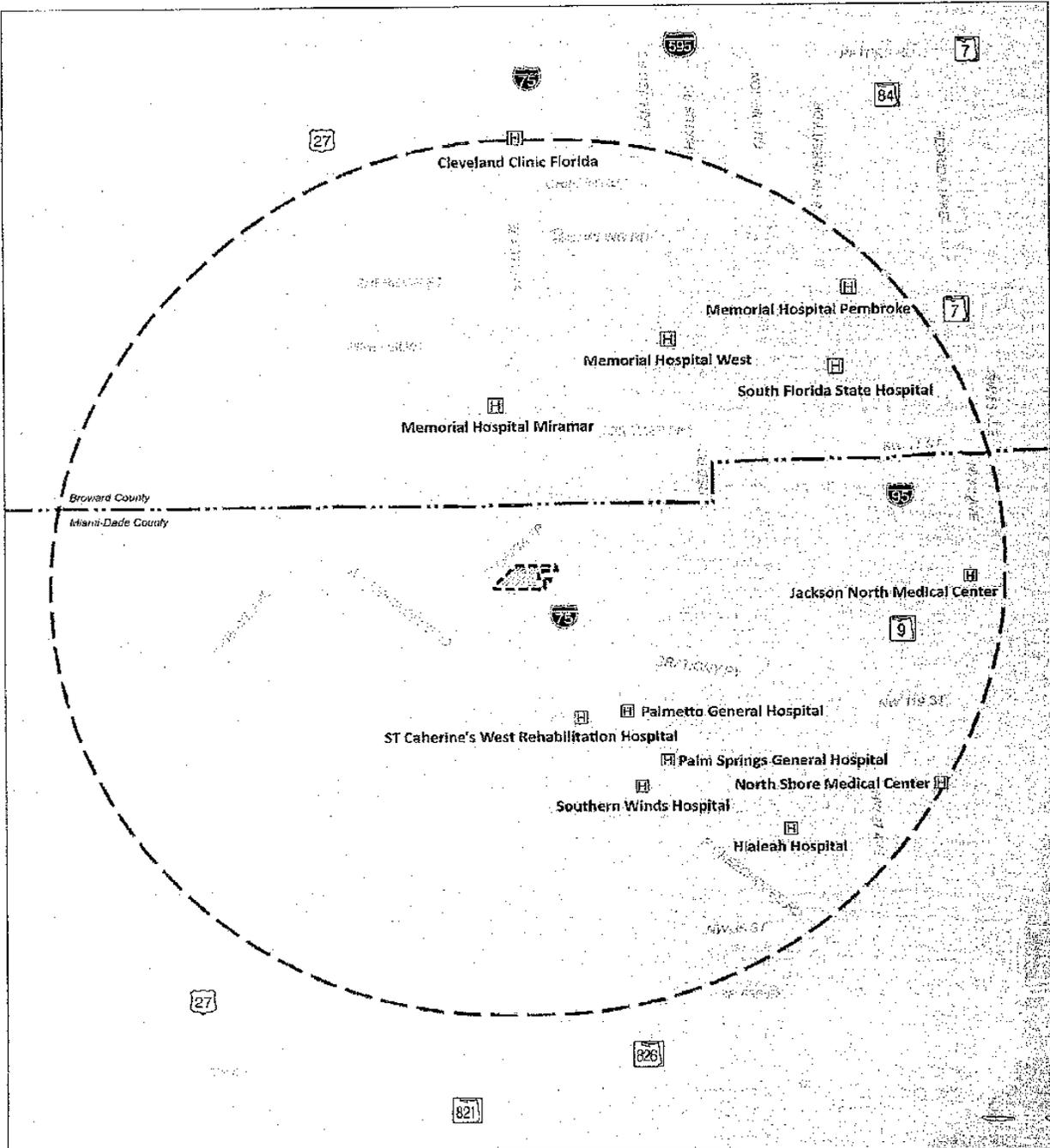
Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
#37913362_v1



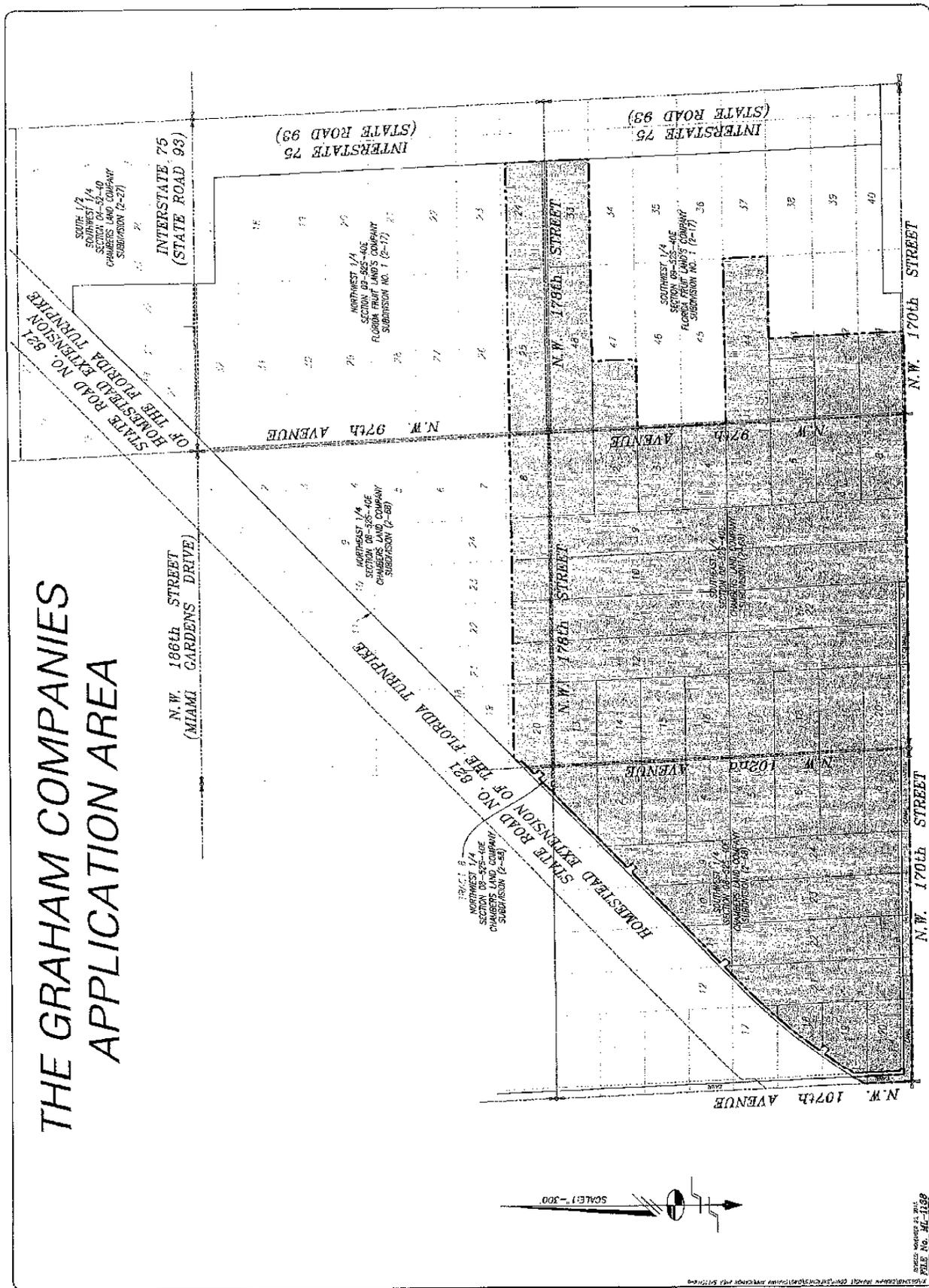
LEGEND

-  Project Boundary
-  10-Mile Radius
-  Hospitals

Source: Miami-Dade GIS 2015; Adopted by The Curtis Group, 2015
 0 1.0 3 6 Miles

EXHIBIT 28-1
HOSPITALS/MEDICAL FACILITIES WITHIN A 10-MILE RADIUS
 THE GRAHAM COMPANIES

THE GRAHAM COMPANIES APPLICATION AREA



Holland & Knight

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Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Ms. Vilma Gleiberman
Chief Executive Officer
Palm Springs General Hospital
1475 W 49 Pl.
Hialeah, FL 33012

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Ms. Gleiberman:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
#37913757_v1

Holland & Knight

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Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Mr. Manny Linares
Chief Executive Officer
North Shore Medical Center
1100 NW 95 St,
Miami, FL 33150

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Mr. Linares:

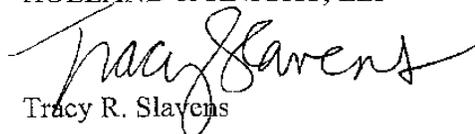
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Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP



Tracy R. Slavens

Enclosure
#37913936_v1

Holland & Knight

701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Ms. Gilda Baldwin
Chief Executive Officer
Southern Winds Hospital
4225 W 20th Avenue
Hialeah, FL 33012

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Ms. Baldwin:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP



Tracy R. Slavens

Enclosure
#37914152_v1

Holland & Knight

701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Mr. Ben A. Rodriguez
Chief Executive Officer
Hialeah Hospital
651 E 25 St,
Hialeah, FL 33013

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Mr. Rodriguez:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

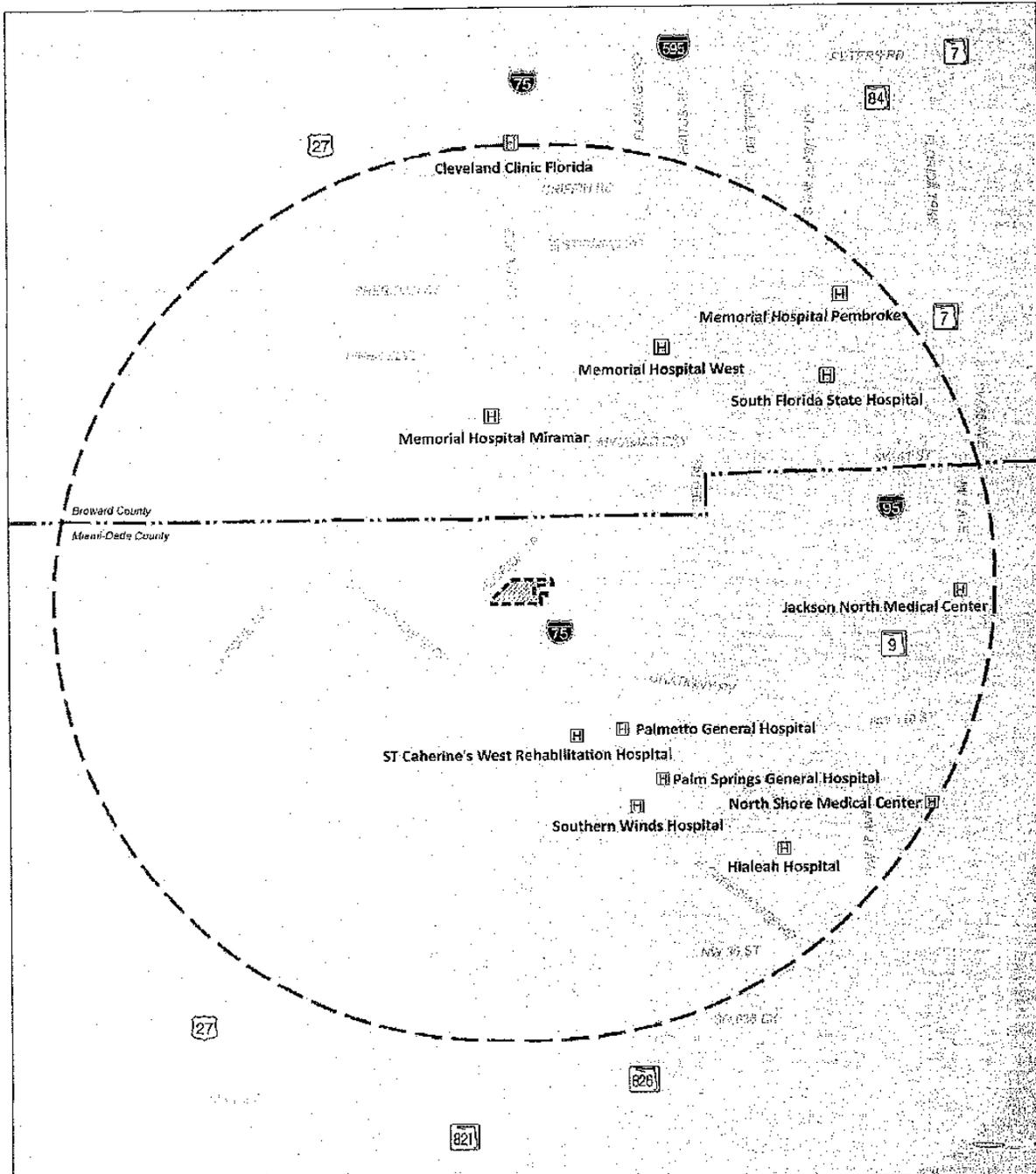
Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
#37914229_v1



LEGEND

-  Project Boundary
-  10-Mile Radius
-  Hospitals

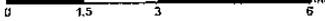
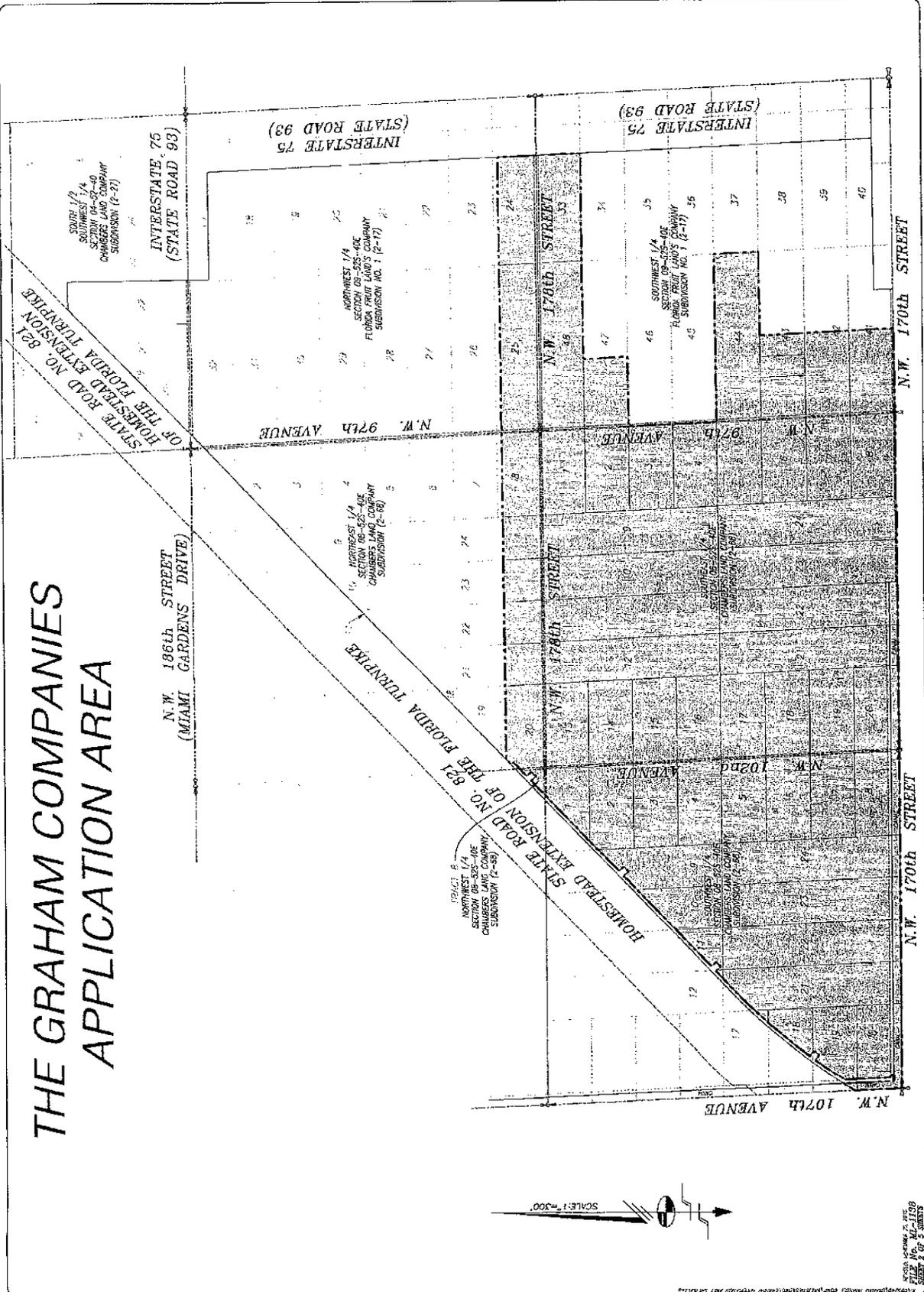
Source: Miami-Dade GIS 2015; Adapted by The Curlio Group, 2015
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EXHIBIT 28-1
HOSPITALS/MEDICAL FACILITIES WITHIN A 10-MILE RADIUS
 THE GRAHAM COMPANIES

THE GRAHAM COMPANIES APPLICATION AREA



Holland & Knight

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Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Ms. Leah A. Carpenter
Administrator and Chief Executive Officer
Memorial Hospital Miramar
1901 SW 172 Avenue,
Miramar, FL 33029

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Ms. Carpenter:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
#37914363_v1

Holland & Knight

701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Ms. Lee D. Packer
Hospital Administrator
South Florida State Hospital
800 E Cypress Dr,
Pembroke Pines, FL 33025

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Ms. Packer:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
#37914693_v1

Holland & Knight

701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Mr. C. Kennon Hetlage, FACHE
Memorial Hospital West
Administrator and Chief Executive Officer
703 N Flamingo Rd,
Pembroke Pines, FL 33028

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Mr. Hetlage:

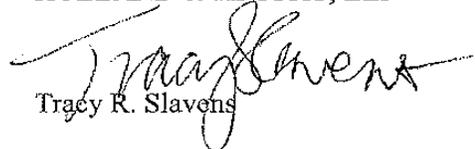
In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
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Holland & Knight

701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Tracy R. Slavens, Esq.
305 798 7642
tracy.slavens@hklaw.com

November 30, 2015

VIA EMAIL AND U.S. MAIL

Mark E. Doyle, MBA
Administrator and Chief Executive Officer
Memorial Hospital Pembroke
7800 Sheridan St,
Pembroke Pines, FL 33024

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Mr. Doyle:

In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

Enclosure
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November 30, 2015

VIA EMAIL AND U.S. MAIL

Dr. Wael Barsoum, MD
Chief Executive Officer
Cleveland Clinic Hospital
3100 Weston Rd,
Weston, FL 33331

**RE: Graham Properties CDMP Amendment Application – November 2015 Cycle
Request for Confirmation of Availability of Health Care Services**

Dear Dr. Barsoum:

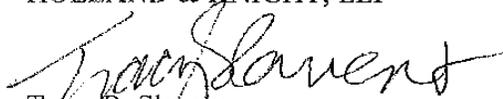
In connection with an application to amend the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) on behalf of Graham Properties, we have been asked by the County’s Planning Staff to obtain information from health care service providers regarding their ability to provide our project with health care services.

Graham Properties is applying for the approval of an amendment to the CDMP for +/-339 acres located generally east of the Homestead Extension of Florida’s Turnpike and north of NW 170 Street in un-incorporated Miami-Dade County. A sketch of the application subject property is enclosed for your reference. The application is seeking to redesignate the subject property from “Industrial and Office” to “Business and Office” with an “Employment Center” overlay. The applicant will be proffering a declaration of restrictions in connection with the application that will limit its development to 2,000 multi-family dwelling units (rental only), 1,000,000 square feet of commercial use, and 3,000,000 square feet of business park use. The development of the subject property is intended to both complement and support the nearby proposed American Dream and Beacon Countyline projects.

Please indicate in your response whether or not your present facilities and staffing are capable of serving the Project or specify the additional staffing/equipment necessary to do so. If you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

Regards,

HOLLAND & KNIGHT, LLP


Tracy R. Slavens

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Question 29 – Energy

- A. Provide a projection of the average daily energy demands at the end of each development phase for each of the following: electrical power, gas, oil, coal, etc. For electrical power, also provide the peak hour demand at the end of each phase.**

Projected average daily electrical demands are summarized in **Table 29-1, Projected Electrical Energy Demand**. Based upon the Maximum Impact Development Scenario (MIDS), the project will have a cumulative total daily demand of 483,050 KWH and a cumulative total Peak Hour Demand of 29,734 KWH.

Table 29-1 Projected Electrical Energy Demand			
Land Use	Total	Cumulative Total Daily Energy Demand (KWH)	Cumulative Total Peak Hour Demand (KWH)
Residential	2,000 du	92,000	7,607
Retail	750,000 sf	40,500	3,375
Office/Business	3,000,000 sf	221,400	17,310
Restaurant	250,000 sf	129,150	1,442
Total		483,050	29,734

- B. If there is to be an on-site electrical generating facility (post-construction) describe its proposed capacity and use.**

No on-site electrical generation is planned for this site.

- C. If energy (electrical power, natural gas, etc.) is to be obtained from an off-site source, attach a letter from the firm or agencies providing service outlining:**

- a. **The projected excess capacities of the facilities and transmission line to which connection will be made at present and for each phase through completion of the project,**
- b. **Any other commitments that have been made for this excess capacity,**
- c. **A statement of the supplier's ability to provide service at all times during and after development. (The supplier must be provided with demand information in (A) above.)**

See letter from FPL stating their commitment to provide service to the site (**Exhibit 29-1, FPL Commitment Letter**).

D. Describe any energy conservation methods or devices incorporated into the plan of development. What considerations relative to energy conservation will be incorporated into the site planning, landscape, and building design, and equipment and lighting selection for this project?

The site will incorporate energy conservation measures. All building construction will incorporate those requirements stated in the South Florida Building Code and the Florida Energy Efficient Building Code. Consideration of high efficient temperature control equipment, landscaping and efficient site lighting will all be part of the project planning process.

Exhibit 29-1
FPL COMMITMENT LETTER



November 10, 2015

John Tello
Assistant Vice-President
Schwebke-Shiskin & Associates, Inc.
3240 Corporate Way
Miramar, FL 33025

Re: Graham Property
Located V/O NW 97th AVE & 170th ST
In Hialeah, Dade County

Dear John Tello:

Thank you for contacting FPL early in your planning process. At the present time FPL has sufficient capacity to provide electric service to your property. We have facilities available in the area that would need to be extended into the property currently available at this location.

Please advise me early in the planning process once the final plans have been approved. This information will help us to provide you with the best service in accordance with applicable rates, rules and regulations. You may also respond to us through www.fpl.com. Please contact me if you have any questions.

Sincerely,

FPL representative

Question 30 – Historical and Archaeological Sites

- A. 1. Describe any known historical or archaeological sites on the development site. Provide a letter from the Department of State, Division of Historical Resources (DHR) which includes a list of known sites within the development site, the likelihood of historical or archaeological sites occurring within the development site, whether a site survey is needed, and whether any known sites are significant.**

To our knowledge there are no Historical and/or Archaeological sites on this development site. See letter from the Archeological Data Analyst, Florida Master Site File (**Exhibit 30-1, Letter from Florida Master Site File**).

- 2. If DHR recommends that a site survey be done, the results of such a survey, conducted for the development site by an acceptable professional, should be provided.**

If DHR recommends that a site survey be done, the developer will retain a qualified professional to refer a Phase I Reconnaissance cultural Resource Assessment.

- B. If significant historical or archaeological sites exist on-site, indicate what measures would be taken to protect them, or to minimize or mitigate impacts to them. Where appropriate, describe the measures for providing public access to the sites.**

If significant Historical or Archeological sites exist on site, the qualified Professional that performs the Phase I, Reconnaissance Report will prepare a plan acceptable to DHR, for the protection, impact minimization or mitigation of those impacted sites.

Exhibit 30-1
Letter from Florida Master Site File



This record search is for informational purposes only and does **NOT** project review. This search only identifies resources recorded at the Florida Master Site File and does **NOT** provide project approval from the Division of Historical Resources. Contact the Compliance and Review Section of the Division of Historical Resources at 850-245-6333 for project review information.

November 12, 2015

John Tello
Assistant Vice-President
Schwebke-Shiskin & Associates, Inc.
3240 Corporate Way
Miramar, Florida 33025
Phone: (305) 652-7010
Email: johntello@shiskin.com



In response to your inquiry of November 12, 2015, the Florida Master Site File lists no previously recorded archaeological sites, one resource group and no standing structures found in the following parcels of Miami Dade County:

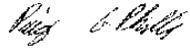
The portions of T52S R40E Sections 07, 08, and 09, shown within the outlined area on the corresponding map.

When interpreting the results of our search, please consider the following information:

- **This search area may contain *unrecorded* archaeological sites, historical structures or other resources even if previously surveyed for cultural resources.**
- **Because vandalism and looting are common at Florida sites, we ask that you limit the distribution of location information on archaeological sites.**
- **While many of our records document historically significant resources, the documentation of a resource at the Florida Master Site File does not necessarily mean the resource is historically significant.**
- **Federal, state and local laws require formal environmental review for most projects. This search DOES NOT constitute such a review. If your project falls under these laws, you should contact the Compliance and Review Section of the Division of Historical Resources at 850-245-6333.**

Please do not hesitate to contact us if you have any questions regarding the results of this search.

Sincerely,



Paige Phillips
Archaeological Data Analyst
Florida Master Site File
Paige.Phillips@dos.myflorida.com

500 South Bronough Street • Tallahassee, FL 32399-0250 • www.flheritage.com/preservation/sitefile
850.245.6440 ph | 850.245.6439 fax | SiteFile@dos.state.fl.us



December 7, 2015

Tracy Slavens, Esq.
Holland & Knight, LLP
701 Brickell Avenue
Suite 3300
Miami, Florida 33131

RE: Graham Properties CDMP Amendment Application - November 2015 Cycle
Request for Confirmation of Availability of Health Care Services

Dear Ms. Slavens:

I am in receipt of your letter dated November 30, 2015 regarding the Graham Properties CDMP Amendment Application. Southern Winds Hospital is capable of serving the Project by providing inpatient psychiatric services with no additional staffing or equipment based on occupancy rates.

If you should have any questions or require any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gilda Baldwin".

Gilda Baldwin, DHSc, MMS
Chief Executive Officer

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