Memorandum

MIAMI-DADE COUNTY

Date: September 1, 2026

To: Honorable Chairman Anthony Rodriguez
and Members, Board of County Commissioners

From: Daniella Levine Cava
Mayor

Daniella Levine Cava

Subject: Third Supplemental Information on May 2023 Cycle Application No. CDMP20230013 to Amend the Comprehensive Development Master Plan

Supplement No. 3 to
Agenda Item No. 7(F)

The following third supplemental information is provided to the Board of County Commissioners regarding May 2023 Cycle Application No. CDMP20230013 to amend a Comprehensive Development Master Plan (CDMP). The information includes: (Exhibit 1) a supplemental report dated July 2026 addressing changes to CDMP Application No. CDMP20230013 and (Exhibit 2) Additional Items received by the Department of Regulatory and Economic Resources.

Roy Coley

Roy Coley
Deputy Mayor

MIAMI-DADE COUNTY
DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES

SUPPLEMENTAL REPORT ADDRESSING CHANGES TO COMPREHENSIVE DEVELOPMENT MASTER PLAN AMENDMENT APPLICATION CDMP20230013

July 2026

This supplemental report presents updated information submitted by the Applicant, Kelly Tractor Company (Kelly), and changes made to the May 2023 Cycle Application CDMP20230013 to amend the Comprehensive Development Master Plan (CDMP) subsequent to the Board of County Commissioners' (Board) January 22, 2026 CDMP meeting on the Application. The updated information and changes to the Application, including commitments in the proffered Declaration of Restrictions (covenant) as outlined herein, provide the basis for the application to be consistent with the CDMP.

The CDMP necessarily requires a balancing of competing policies to meet the needs of a heavily populated, diverse community while ensuring that any balancing protects the public health, safety and welfare. Specific to this application, competing policies primarily involve those promoting economic development and workforce support with those that protect environmental resources. Taken together, the workforce support and environmental protection commitments in the proffered covenant provide appropriate balancing of the economic development and environmental protection policies of the CDMP, among the other issues addressed below. Additionally, the proffered covenant commitment to allow use of the property for emergency response in the event of a declared emergency will further support protection of the public health, safety and welfare. Provided these commitments are adequately provided for the final covenant, the application can be found to be consistent with the CDMP.

The Applicant submitted a Technical Memorandum dated June 2026 prepared by Lambert Advisory to justify the 'need' for the requested CDMP amendment to facilitate the proposed new headquarters for Kelly, changes to the Application submitted by letter dated April 7, 2026, and a revised proffered Declaration of Restrictions to address concerns previously raised by staff and provide new proffers in conjunction with the application. The June 2026 Technical Memorandum (Attachment 1) is discussed below, the changes to the Application are discussed on page 5 herein, and the revised proffered Declaration of Restrictions (Attachment 2) is discussed on page 6 herein.

DEMONSTRATION OF NEED

The Technical Memorandum presents two approaches in effort to address the question of need. First, is an approach from an economic and market support basis (identified as Needs Analysis I), and second, from a more traditional needs assessment responsive to CDMP Land Use Element Policy LU-8F (identified as Needs Analysis II, see page 3 herein).

Needs Analysis 1

In this analysis the Technical Memorandum presents four (4) topical issues unique to this application and identified below from which Staff identified five (5) points that are particularly substantive toward the demonstration of need.

- The Caterpillar Company (page 8 of the Technical Memorandum)
- Kelly Tractor & Cat – A Critical Community Resource (page 11)
- Market & Economic Conditions Driving Need For Expansion (page 13)

- Maintain Presence & Dominance Over Global Competitors Locally (page 15)

The five (5) substantive points Staff identified that are particularly demonstrative of need are as follows:

International Competition: The proposed new headquarters includes enhanced facilities that would allow Kelly to effectively play its part in the Caterpillar Company's ("CAT") network of dealerships in maintaining competitiveness and market dominance, particularly in light of foreign business competition**.** The Technical Memorandum identifies competition from overseas heavy equipment manufacturers that have established in the USA, with one such business headquartered in Georgia and competing in the South Florida market, among the drivers of the need for a larger headquarters.

- CAT is an American manufacturer of large machinery, is the global leader in construction/heavy equipment manufacturers with close to 16 percent of global market share, 25 percent of construction equipment sales in the United States and approximately 40 percent of the heavy construction equipment market.
  - Kelly is uniquely positioned as a Cat dealership serving the 13-county South Florida region, established and headquartered in Miami-Dade County since the 1970's.
  - Kelly had 41 percent market share of heavy equipment sold in the South Florida market and 37 percent in Miami-Dade County in the past year.
- The Technical Memorandum cites Cat's operating model of strong customer experience and service focus as a reason for its market dominance.
  - Cat's network of dealerships, including Kelly, are to maintain and enhance this customer experience and service focus.
- To maintain and enhance the competitiveness of the business, Kelly advocates for the new headquarters at the ±246-acre site.
  - Kelly cites two like business headquarters on sites of 85 and over 140 contiguous acres.
    - Ring Power, St Augustine, Florida; Cat dealership headquarters relocated from ±38-acre site to 85+ acres.
    - Holt Cat, San Antonio, Texas; Cat dealership built on over 140 acres.
- Proposed new headquarters would facilitate business with Caribbean and Latin America.
  - Venezuelan market cited as an example of new business opportunities being explored.

1970's era existing Kelly headquarters is obsolete: The existing Kelly headquarters was built primarily in the 1970's with some portions built in the early 1980's, based on Miami-Dade Property Appraiser information, and is cited as functionally obsolete in light or current market demands.

- Noting the existing Kelly headquarters was built over 50 years ago, the Technical Memorandum cites its obsolescence and the resulting need to consolidate the headquarters onto a larger contiguous site with modern facilities having the capacity to meet current and future business needs, including appropriately responding to technological advancements.
  - The existing headquarters is also bifurcated by NW 82 Avenue.
  - Kelly's vacant ±9.43-acre parcel is separated from the headquarters by NW 84 Avenue.
  - The new headquarters is needed to enhance service and customer experience.
- Kelly indicates its plan includes consolidation into the proposed new headquarters of certain satellite operations that are currently outside of Miami-Dade County.

Technology Advancements and Heavy Equipment Electrification: Technological advancements in the heavy equipment industry, including the industry's transitioning from diesel to advanced battery technology, dictate the need for modern technologically advanced facilities.

- Technological advances including the electrification of heavy equipment fleets are driving the need for more climate-controlled equipment and battery storage, and service/repair facilities.

  - Facilities for diesel equipment service/repair remain necessary and together with the expanding requirement for facilities oriented to battery powered equipment emphasizes the need for a larger and more modern business footprint.

Rail Access: The ±246-acre site proposed for the new Kelly headquarters has the potential for rail access and is one of two practical locations for rail transportation access.

- Potential rail access is through an existing CSX Transportation, Inc., rail line located just over ¼-mile north of the site along the north side of NW 12 Street extending west of NW 137 Avenue to theoretical NW 146 Avenue.
  - The existing CSX rail spur provides an opportunity for more efficient transportation of heavy equipment and parts that do not exist at the current headquarters site.
  - The Kelly headquarters is 1-mile west of the Florida East Coast Railway's rail terminal near the Miami International Airport but the closest point of access to this terminal is from NW 74 Street at NW 69 Avenue, over 2.5 miles away.
- A ±98.4-acre site in the Town of Medley is the only other vacant site over 50 acres, identified in Needs Analysis II below, with the potential for rail access.

Efficiency: The new headquarters would allow greater efficiency of operations that is essential to Kelly remaining competitive if not the dominant force in the South Florida market area. The existing Kelly headquarters is constrained and bifurcated by roadways in comparison to the congruous and over 85-acre Ring Power and 140-acre Holt Cat dealership headquarters.

- Overall efficiency of the business operations would be enhanced through construction of more modern and technologically advanced facilities at the proposed new headquarters site.
  - The ±246-acre site is not bifurcated by roadways as is the current headquarters site.
  - The new site would facilitate a layout optimized for efficiency of the business operations.
  - Kelly indicates its plan includes consolidation of certain satellite operations onto the new headquarters for more efficient operations.
  - The existing CSX rail spur also presents an efficient transportation opportunity.

Based on the above factors, approval of the Application would facilitate the retention and expansion of an existing business consistent with the intent of the CDMP Economic Element Goal IV, Objective ECO-7, and Policies ECO-7C, ECO-7F, ECO-9A, and ECO-11A that contemplate the retention and support of existing businesses and their growth. The proposed growth and expansion of the Kelly headquarters in Miami-Dade County is also consistent with Land Use Element Policy LU-8E as it would facilitate economic growth in the area and would further the County's intent for and implementation of the Transportation Infrastructure Improvement District (TIID). The ±246.07-acre site proposed for the new Kelly headquarters is within one mile of the East-West Corridor (SR-836 Expressway), one of the SMART Plan corridors, and is bifurcated by the Urban Development Boundary (UDB) and the Urban Expansion Area (UEA). Approximately 244.37 acres are outside the UDB, of which ±87 acres are inside the UEA (where urban expansion is considered when warranted), and ±1.7 acres inside the UDB.

The Miami-Dade Board of County Commissioners (Board) endorsed the SMART Plan corridors in 2016 (Resolution No. R-523-16) and, in 2019 (Ordinance 19-07), established CDMP policies for development of properties inside the UDB within one (1) mile of the East-West Corridor and one-half (1/2) mile of the remaining SMART Plan corridors. The ±246.07-acre site of the proposed new Kelly Headquarters is within the SMART Plan related TIID, as established through Ordinance 18-8. Within the TIID, future ad valorem tax revenue increases are captured to help fund the SMART Plan rapid transit projects in combination with other local, state, and federal funding sources. Approval of the application and development of the site as proposed would generate greater tax revenue to the TIID.

Additionally, Miami-Dade County consistently makes investments in supporting the recruitment, growth and expansion of local industry, through the Beacon Council, tax incentives, small business assistance and innovation grants and initiatives, and educational and training programs and partnerships to support small businesses. Accordingly, over the past five years the County has allocated $78,316,000.00 toward programs and infrastructure to help establishment and growth of local businesses. In addition, over 15,000 contracts valued at almost $1.5 billion were awarded through the Strategic Procurement Department's Small and Local Business Development to Small Business Enterprises (SBE) and Disadvantage Business Enterprises (DBE). Ensuring the continued success of a long-time local business providing hundreds of local jobs is a key priority for our long-term economic development and prosperity, and in line with decades of County investment.

Needs Analysis II

Within the Applicant's Technical Memorandum the "Needs Analysis II: Traditional Needs Assessment for Land to Support Industrial Development" section (beginning on Technical Memorandum page 22) presents a critique of Staff's land supply and demand analysis typically used to determine the adequacy of industrial lands inside the UDB. This critique presents that the County's industrial land supply may be depleted by year 2030 or 2032 based on an alternative methodology and set of assumptions. The Technical Memorandum also highlighted a July 2025 land capacity analysis by Staff that indicated the inventory of vacant industrial land in the County would be depleted by 2033 and also presents April 2026 data, stated to be from County sources, that Staff reviewed and verified it does not accurately reflect the County data. Staff reviewed the information provided in the Technical Memorandum and updated its industrial land supply and demand analysis with the most current data available.

Staff's current May 2026 analysis concludes that vacant industrial land (all inside the UDB) has the capacity to sustain industrial growth for 10 years, until 2036, both countywide and in the general analysis area north of SW 8 Street and south and west of Okeechobee Road, where the Kelly Tractor application site is located and identified as the North Central Planning Analysis Tier. The projection of industrial growth is based on historic growth trends from the past 20 years that account for the fluctuations (increases/decreases) over time in the supply and demand for vacant developable land. Fluctuations in the supply of vacant industrial land are based on approved changes in the future land use and zoning for such properties, both in unincorporated Miami-Dade County and the incorporated areas of the County, and the demand changes are driven by market forces. It must also be considered that Florida's Live Local Act (Chapter 2023-17, Laws of Florida, as amended) that allows residential development to be built within industrial, commercial, and mixed-use areas will impact the depletion of vacant/developable industrial land but the extent of such impact on the County's industrial land supply are not clear at this time.

A key point of note regarding the industrial land capacity is there are only five (5) vacant properties larger than 50 acres inside the UDB, including:

- ±98.4-acre property within Town of Medley at the southeast corner of NW 106 Street and NW 107 Avenue (the property is in the Town of Medley and has potential for rail access).
- ±68.5-acre property within the Homestead Park of Commerce (no direct expressway access).
- ±82.9-acre County owned Economic Conveyance properties at the Homestead Air Reserve Base (HARB) and does not have direct expressway access.
- ±117.4-acre former Calder Race Course or Gulfstream Park West at the Miami-Dade/ Broward county line between NW 27 Avenue and Turnpike. Access to the Turnpike Expressway within 1,400 feet or just over ¼-mile and within 3,280 feet or just over ½-mile of the property.
- ±182.6-acre existing lake in Hialeah Gardens between the Turnpike and NW 107 Avenue south of NW 170 Street, was approved by the City to be filled (has direct expressway access).

Very limited sites of large contiguous acreage are available for industrial development that have large acreage requirements. The existing Kelly headquarters occupies ±41.25 acres (with its subsidiary Pantropic Power) and Kelly owns an adjacent vacant ±9.43-acre parcel. ±35 acres of the headquarters site are contiguous located north of NW 58 Street between NW 82 Avenue and NW 84 Avenue and the remaining ±6.25 acres are on the east side of NW 42 Avenue. The vacant ±9.43-acre parcel is on the west side of NW 84 Avenue.

Proffered Declaration of Restrictions

The Applicant has revised some conditions/commitments in the revised proffered Declaration of Restrictions (covenant) that addresses several concerns raised by Staff and added new commitments including the enhanced wetlands preservation commitments. The revised covenant is included as Attachment 2 hereto and the referenced changes include:

i. Revised commitment expanding the acreage of wetlands to be preserved and maintained on site from ±34 acres to a minimum of ±63.11 acres and that that proposed or required right-of-way dedications may not count towards the minimum ±63.11 acres of on-site wetlands preservation. *This commitment satisfies the minimum wetlands preservation requirement, as further discussed below, and with the additional 20 acres of off-site wetlands preservation now totals 83.11 acres.*

   This commitment also ensures that road rights-of-way may not diminish the acreage of on-site wetlands preservation areas (including right-of-way of the potential extension of SR-836/Dolphin Expressway).

ii. A commitment providing ±20 acres of offsite wetland preservation areas for conveyance to the County's Environmentally Endangered Lands (EEL) Program. *This and the above referenced commitment would result in a total ±83 acres of wetlands preservation.*

iii. Enhancement of the wetlands mitigation commitment providing that any wetland impacts mitigation for wetlands permitting will be fulfilled through "(1) on-site mitigation or (2) permittee responsible mitigation within Miami-Dade County (which may include permittee responsible mitigation within County property to the extent permissible), except to the extent that there are wetland mitigation bank credits available at banks in Miami-Dade County and mitigation is done via such credits from within Miami-Dade County." *This commitment requires that any wetland impacts not mitigated on-site are prioritized for mitigation within Miami-Dade County, rather than elsewhere in the state as is otherwise permissible by state law*.

iv. Inclusion of a Conceptual Plan that is for illustrative purposes only and that identifies the location and minimum acreage requirement for the wetlands to be preserved on site. The proffered covenant expresses the intent for the site to be developed in a manner similar to the Conceptual Plan.

v. Commitment to construct or cause to be constructed the necessary NW/SW 139 Avenue roadway improvement to provide relief to NW/SW 137 Avenue that is projected to operate in violation of its adopted level of service standard, prior to the issuance of a certificate of occupancy for any portion of the property. *This commitment was added by the Applicant at the Board's January 22 CDMP hearing and is retained*.

vi. A new commitment to providing the County access to the ±246-acre property to assist with County emergency management and response efforts during declared states of emergency affecting the County.

vii. A new commitment to provide notice to the County, prior to listing, should the existing Kelly headquarter property, or any portion thereof, be considered for sale.

viii. A new commitment to establish a Community Education and Training Program in coordination with the Miami-Dade County Public Schools that would provide workforce training and development to post-secondary and/or high school students.

The inclusion of the commitment to establish a Community Education and Training Program in coordination with the Miami-Dade County Public Schools that would provide workforce training and development to post-secondary and/or high school students that furthers Goal III, Objectives ECO-3 and ECO-7, and Policies ECO-7C, and ECO-7F of the CDMP Economic Element. Together this goal, objectives, and policies call for, in part, the County to establish partnerships and programs geared toward work force growth and development. The training commitment would further this intent of the CDMP.

Additionally, the Applicant has adequately addressed the minimum required on-site wetlands preservation requirements previously outlined by Staff and has committed to providing additional acreages of wetlands preservation, totaling a minimum ±63 acres of on-site preservation and a minimum 20 acres of offsite preservation. These commitments would result in over 83 acres of wetlands preservation and are separate and apart from the mitigation that will be required for wetlands impacted by the development proposed on the ±246-acre site.

It was previously noted that the Application and development it proposes would generate substantial impacts to Wetlands of Regional Significance, the mitigation of which was not demonstrated to be in full compliance with CDMP Objectives CON-4 and CON-7, and Policies CON-4A and CON-7A. Staff noted that ±63 acres of wetlands on the site are currently under previously recorded covenants for protection and that of the total required mitigation for the proposed development's wetlands impacts, a minimum one (1) acre of on-site mitigation for each acre of covenanted wetlands impacted is required. The proposed CDMP text and the proffered covenant have been revised as outlined above to meet this wetland mitigation requirement whereby a minimum of ±63.11 acres of wetlands will be consolidated and preserved on-site, with the additional 20 acres of off-site wetlands preservation. The CDMP affords a high level of protection for Wetlands of Regional Significance including protection of their biological and hydrological functioning, and public acquisition where possible. The application now commits to consolidating, enhancing and preserving the wetland acreage currently under covenant (±63 acres) in a manner that enhances hydrologic functioning and wildlife connectivity, while bringing new areas into conservation.

Applicant's Changes to the Application

The changes made to the Application submitted by the Applicant by letter dated April 7, 2026 includes revisions to the Applicant's proposed CDMP text that adequately address several concerns previously raised by Staff. The revisions to the proposed CDMP text with the Staff concerns addressed are as follows:

i. Replacement of the words "and supportive" previously proposed to be added to the first paragraph of the Open Land Subarea 3 (Tamiami-Bird Canal Basins) text with "or the MIA Equipment and Supportive Services Area" (see page 8 herein). *This addresses a prior Staff concern by narrowing the range of possible supportive uses to be specific to those outlined for the MIA Equipment and Supportive Services Area.*

ii. Revision of the first sentence of the proposed text clarifying the area subject to the proposed amendment is the ±246-acre Kelly site (page 8) and the inclusion of a new 'Figure 6.1: MIA Equipment and Support Services Area' map (page 10). *These address a prior Staff concern* *by identifying the specific property to which the proposed development applies and excluding properties the prior proposed text would have included.*

iii. Addition of a new criterion for the MIA Equipment and Support Services Area ensuring that proposed or required right-of-way dedications may not count towards the minimum ±63.11 acres of on-site wetlands preservation (page 10). *This addresses concerns of road rights-of-way diminishing the acreage of on-site wetlands preservation areas (including right-of-way of the potential extension of SR-836).*

iv. Update from 2026 to 2028 the year by which the implementing land development regulations to permit the uses contemplated in the MIA Equipment and Supportive Services Area are to be developed (page 9).

v. Changes the previously proposed “Freight rail terminals” use allowance to “Freight rail connection” (page 9). *This addresses a prior staff concern with the substantial scale and impacts of a rail terminal as opposed to the less intense rail connection now proposed.*

Replacement of the previously requested ‘MIA Transportation and Infrastructure Support Area’ with the currently requested ‘MIA Equipment and Supportive Services Area’ in the list of proposed uses and footnote (page 9). *This is a necessary correction to update the proposed text.*

CDMP AMENDMENT REQUESTS

1. **Amend the CDMP Land Use Element text under Open Land and subsection Open Land on page I-77 as outlined below.** Single underlined words are the Applicant's proposed CDMP text changes previously considered by the Board of County Commissioners at its January 22, 2026 CDMP meeting. Double strikethrough and double underlined words are the Applicant's proposed revisions made since January 22, 2026. All other words are existing text of the CDMP and remain unchanged.

Open Land Subarea 3 (Tamiami-Bird Canal Basins). This subarea is bounded on its north by hypothetical NW 12 Street and SW 8 Street, on the east by the year 2030 UDB, on the south by the year 2030 UDB and hypothetical SW 56 Street, and on the west by SW/NW 147 Avenue and Levee 31N. The subarea: includes the eastern portion of the North Trail basin and the Bird Drive Everglades basin. Uses that can be considered for approval in this subarea include rural residences at a maximum density of 1 dwelling unit per 5 acres, compatible institutional uses, public facilities, utility and communications facilities, seasonal agricultural use, recreational use, or limestone quarrying ~~and supportive~~ and ancillary uses, or the MIA Equipment and Supportive Services Area.

*   *   *

MIA Equipment and Supportive Services Area. The MIA Equipment and Supportive Services Area applies to approximately 246.07 acres of land that are generally bounded by ~~The boundaries of the MIA Equipment and Supportive Services Area are as follows:~~ NW 9 Lane on the north, NW 147 Avenue on the west, NW 6 Street on the south, and ~~NW 137 Avenue and~~ State Road 836 ramp on the east. The purpose of the MIA Equipment and Supportive Services Area is to centralize certain storage, service, operation and the maintenance of heavy construction and specialized equipment critical to the limestone quarries, building and maintaining the County's infrastructure, including roadways, water and sewer infrastructure and major stormwater management facilities and to generally support the construction industry in the County. The construction machinery and specialized equipment that would be stored, serviced and maintained in the MIA Equipment and Supportive Services Area plays a pivotal role in the County's limestone production. The Area is located within the boundaries of the Rockmining Overlay Zoning Area (ROZA) and in close proximity to the major mining operations in the County's Lake Belt Area. The MIA Equipment and Supportive Services Area is also critical in supplying the County, State and their contractors with equipment vital to building and repairing highways, roads, bridges, tunnels, railroads, water and sewer and stormwater and environmental infrastructure, landfills, marinas, correctional facilities, airports, and the Port of Miami.

The MIA Equipment and Supportive Services Area is strategically located and is directly served by State Road 836, thereby having excellent accessibility to the County's transportation network. Notwithstanding any other provisions of this Plan, the MIA Equipment and Supportive Services Area is limited to the uses detailed below and any action to approve any other use or to liberalize the standards governing said uses must be approved by the Board of County Commissioners. The purpose of the MIA Equipment and Supportive Services Area is to support the County's existing and planned infrastructure, as well as to serve and support the mining industry, construction, development, logistics and distribution resources and facilities that cater to local, regional, and interstate transportation operations.

The MIA Equipment and Supportive Services Area may be developed with indoor and outdoor heavy equipment and cargo storage, repair and support services, infrastructure and facilities, including:

Proposed Uses	*Building Area (Square Feet)*
Indoor Storage of Equipment, Machinery, Parts and Components	2,240,000
Fabrication and Repair	300,000
Equipment Operations Training Facility	18,000
Administrative Offices and Classrooms	80,000
Equipment Display	10,000
Parts Area	5,000
Equipment Rental and Sales Office	20,000
Limited Commercial Uses (i.e. banks or convenience store) to serve the firms and workers in the ~~*MIA Transportation and Infrastructure Support Area*~~ *MIA Equipment and Supportive Services Area*[1]	30,000

Additional and associated uses may include the following:

- Onsite fuel station for heavy equipment and on highway field service and delivery vehicles. The operation will consist of up to eight (8) pumps, four gasoline, and four diesel fuel pumps. Electrical vehicle charging stations may be provided in accordance with County Code requirements.
- Helicopter landing pad and hangar (approximately 8,000 square feet).
- Up to four truck and equipment washing bays will each be approximately 10,000 square feet (total 40,000). The washing facilities with closed loop recycling; and truck weighing scales.
- Up to ten acres of transloading facilities (as otherwise defined herein) and vertical shipping container storage, not exceeding six (6) levels in height.
- Overnight vehicle parking consisting of up to 200 spaces for parking trucks.
- Designated outdoor areas for heavy equipment training programs.
- Freight rail ~~terminals~~ connection.

Notwithstanding the provisions of this Plan that prohibit the extension of infrastructure outside of the UDB, improvements within the MIA Equipment and Supportive Services Area shall be connected to public water and public sanitary sewer. Moreover, any land development shall conform to the wetland basin plans and be analyzed in accordance with Policy CON-7J and in accordance with applicable portions of the Code.

By ~~2026~~ 2029, unless otherwise extended by the Board of County Commissioners, Miami-Dade County shall develop land development regulations to permit the uses contemplated in the MIA Equipment and Supportive Services Area. The MIA Equipment and Supportive Services Area will be developed in a manner that generally conforms with the following development criteria (“Development Criteria”):

i. The maximum Floor Area Ratio (FAR) on parcels to be developed with vertical construction shall be 0.50; ~~and~~

[1] Up to 30,000 square feet of very limited commercial uses such as restaurant, food trucks, retail, personal services (i.e. banks or convenience store) to serve the firms and workers in the MIA Transportation and Infrastructure Support Area are allowed to be dispersed as small business districts and centers. The specific range and intensity of uses in a particular ~~MIA Transportation and Infrastructure Support Area~~ >>*MIA Equipment and Supportive Services Area*<< may vary by location as a function of the availability of public services and accessibility.

ii. A minimum of 10% of the net lot area of the property shall be developed as landscaped open space. Open space includes exterior surface areas consisting of outdoor, at grade space, including but not limited to greens, squares, plazas, courtyards, terraces, lawns, entrance features, greenbelts, unpaved passive and active recreation areas, water retention areas, canals (including abutting canals) and other water bodies, (except that such water bodies may satisfy no more than 20% of the open space requirement ~~including abutting canals~~), paseos, pedestrian paths, bicycle paths and/or associated landscape areas, landscaping with road rights of way including medians, and above-grade landscaped roof terraces/gardens on buildings or garage structures~~.~~; and

iii. A minimum of 63.11 acres of land shall be preserved onsite. To the extent the preservation areas include any areas proposed or required to be dedicated as public right-of-way, such right-of-way may not count towards the 63.11 acres.

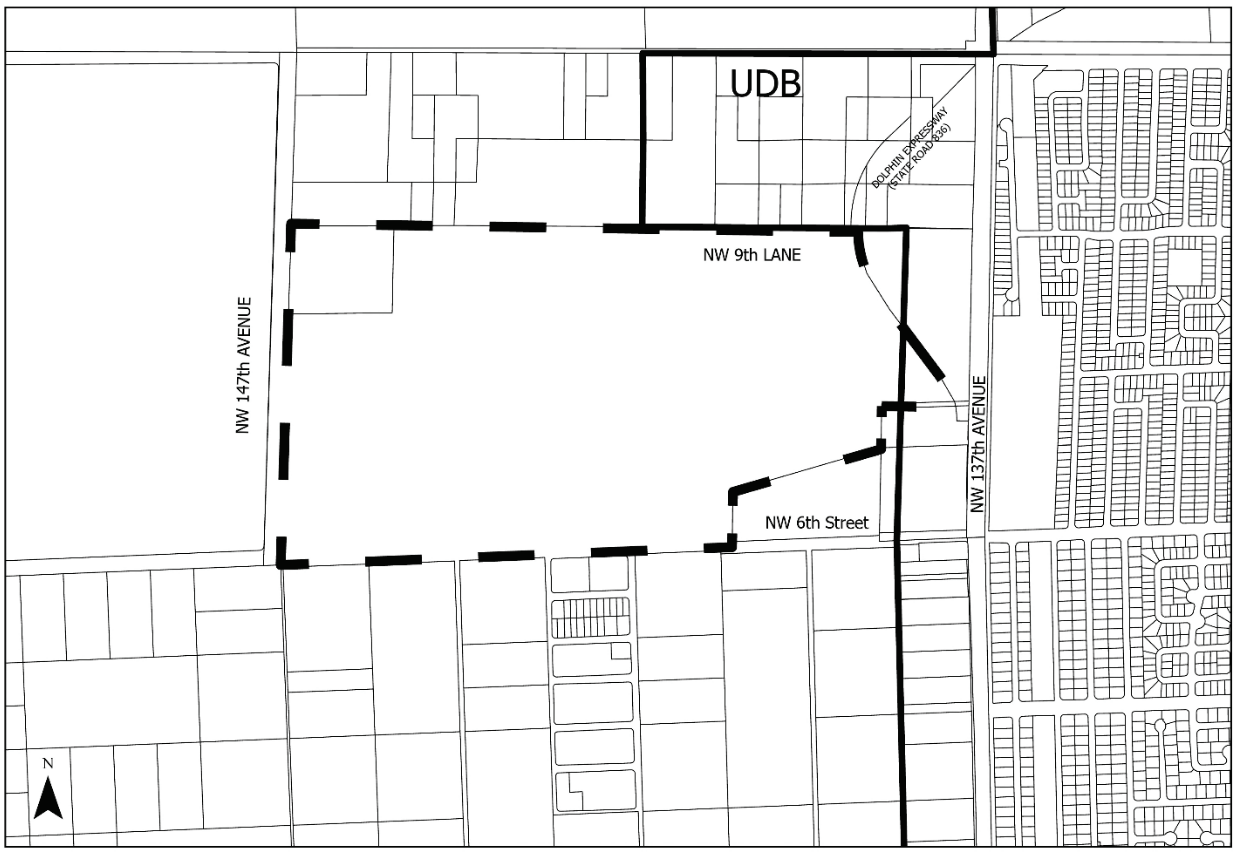

Figure 6.1

0 500 1,000 2,000 Feet

MIA Equipment and Supportive Services Area

2. Amend the Capital Improvements Element as outlined below:

Project Number	Project Name and Location	Purpose/ Estimated Year of Completion	Expenditures/Revenues					Six Years Totals	Future Years	Project Totals	Funding Source
			2019/20	2020/21	2021/22	2022/23	2023/24				
			(In Thousands of Dollars)								
32	Construction of northern 2-lanes of NW 6 Street from NW 137 Avenue to NW 139 Avenue	2030	–	–	–	–	–	–	–	830,000	507.6

a) Revise the "List of Funding Sources" text in the Capital Improvement Element on page X-76, as follows:

Impact Fees/Exactions

500 Road Impact Fees
501 Park Impact Fees
507 Developer Fees/Donation
507.1 Developer Fees/Donation Responsibility/Construct or Cause to Construct – American Dream Miami (May 2016 CDMP Amendment Application No. 5)
507.2 Developer Fees/Donation Responsibility / Construct or Cause to Construct – May 2016 CDMP Amendment Application No. 6 Property Owners
507.6 Developer Fees/Donation/Construct or Cause to Construct – MIA Equipment and Supportive Services Area (May 2023 Application No. CDMP20230013) subject to credit as a contribution-in-lieu of road impact fees
520 Water Connection Charges
521 Wastewater Connection Charges

BACKGROUND

The Miami-Dade Board of County Commissioners (Board) first heard Application No. CDMP20230013 at its July 17, 2025 CDMP public hearing (Transmittal Hearing) and voted to adopt and transmit the application with the proffered Declaration of restrictions (covenant). The Application was transmitted to the Florida Department of Commerce (FloridaCommerce) in its capacity as the State Land Planning Agency, and the other state and regional agencies (Reviewing Agencies) for review and comment in accordance with Chapter 163.3184, Florida Statutes (F.S.). The County subsequently received comments from the reviewing agencies in August and September 2025, including the South Florida Regional Planning Council on August 27, 2025, Florida Department of Environmental Protection on August 29, 2025, and the Florida Fish and Wildlife Conservation Commission on September 4, 2025.

On January 22, 2026, the Board held the second public hearing and voted on the Application, but the County Mayor vetoed the decision. Subsequently, on February 18, 2026, the Board voted to reconsider its decision on the Application. The Board held another advertised public hearing on the Application on April 23, 2026, which was within the period of time, as extended, to hold the second public hearing pursuant to 163.3184(3)(c)1, F.S. At that meeting, after the public hearing, the Board voted to defer the Application to its May 5, 2026 meeting. On May 5, 2026, the Board again deferred the Application to the upcoming June 2, 2026 meeting.

Section 163.3184(3)(c)1, F.S., provides, in part, that “[i]f the local government fails, within 180 days after receipt of agency comments, to hold the second public hearing, the amendments are deemed withdrawn unless extended by agreement with notice to the state land planning agency and any affected person that provided comments on the amendment.” The 180-day period in which to hold the second public hearing after receipt of state agency comments was through February 25, 2026.

The Applicant requested two separate extensions of the 180-day timeframe by letters dated February 18, 2026 and May 11, 2026, to which Staff agreed and provided the requisite notices, by letters dated February 20, 2026 and May 14, 2026 to the State Land Planning Agency Florida Department of Commerce), of the extension of the 180-day timeframe to June 1, 2026 and subsequently to August 22, 2026.

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

The Application could further the intent of the following goals, objectives, policies, concepts of the CDMP:

LU-2C. 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.

LU-6A. Miami-Dade County shall continue to identify, seek appropriate designation, and protect properties of historic, architectural, cultural and archaeological significance.

LU-8G. 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; and
v) Enhance or degrade systems important to the County as a whole including regional drainage, emergency management, transit service, roadways, facilities of countywide significance, and water quality; and
vi) 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.

LU-8F. The Urban Development Boundary (UDB) should contain developable land having capacity to sustain projected countywide residential demand for a period of 10 years. The estimation of this capacity shall include the capacity to develop and redevelop around transit stations at the densities recommended in policy LU-7F. The adequacy of non-residential land supplies shall be determined on the basis of land supplies in subareas of the County appropriate to the type of use, as well as the Countywide supply within the UDB. The adequacy of land supplies for neighborhood- and community-oriented business and office uses shall be determined on the basis of localized subarea geography such as Census Tracts, Minor Statistical Areas (MSAs) and combinations thereof. Tiers, Half-Tiers and combinations thereof shall be considered along with the Countywide supply when evaluating the adequacy of land supplies for regional commercial and industrial activities.

CON-4B. All future development and redevelopment shall use retention, infiltration and detention systems to retain to the maximum extent feasible, the full runoff from a one in five year storm and minimize the use of impermeable surfaces. In the event that an emergency overflow is provided, a minimum of the first inch of runoff shall be retained on-site.

CON-7A. The degradation or destruction of Wetlands of Regional Significance that may be contained within the areas depicted on Figure 14 in the Land Use Element shall be limited to activities that 1) are necessary to prevent or eliminate a threat to public health, safety or welfare; or 2) are water dependent and no other reasonable alternative exists; or, 3) clearly in the public interest and no other reasonable alternative exists; or 4) are carried out in accordance with an approved basin management plan; or 5) are in areas that have been highly disturbed or degraded and where restoration of a wetland with an equal or greater value in accordance with federal, State and local regulations is feasible. Habitats critical to endangered or threatened species shall not be degraded or destroyed.

CON-9B. All nesting, roosting and feeding habitats used by federal or State designated endangered or threatened species, shall be protected and buffered from surrounding development or activities and further degradation or destruction of such habitat shall not be authorized.

CON-9E. Conservation of upland wildlife habitats shall be taken into consideration during development evaluation and permitting processes.

ECO GOAL IV. Institute a business support function to facilitate relations between the local business community and with Miami-Dade County with respect to business development, permitting, regulation, and business problem resolution activities.

ECO-11A. The business assistance entity will aid existing businesses with retention and expansion issues, and provide similar assistance to start-up or relocating businesses.

ECO-9. Miami-Dade County, as a major employer, should promote and publicize the services of the primary workforce development agencies, and local colleges and universities.

ECO-9A. The County should establish partnerships with the major workforce development agencies to assess, create, and implement targeted training programs based on employer needs.

ECO GOAL III. Increase employment and investment through programmatic assistance to business and labor force development programs, both countywide and for subareas.

ECO-7. The County should develop a set of guidelines for close coordination between Miami Dade socio-economic development functions and the primary local organizations having business attraction, expansion and retention program responsibilities, as well as with other non-local institutions, organizations and individuals interested in the economic development of the area.

ECO-7C. The County shall increase appropriate support to local, national and international marketing, which promotes Miami-Dade County and community assets, especially focused on the prioritized industries.

ECO-7F. The County in cooperation with the Beacon Council, chambers of commerce and similar institutions, organizations and individuals will formulate a comprehensive incentive plan for application to business retention.

Attachment 1

Technical Memorandum

Received 5/21/2026
RER-Planning

Kelly Tractor
CDMP20230013

KELLY TRACTOR NEW HEADQUARTERS
MIAMI DADE COUNTY NEEDS ASSESSMENT

Lambert
ADVISORY

JUNE 2026

Summary of Findings

Lambert Advisory has completed its assessment of the need for the Kelly Tractor proposed headquarters associated with CDMP Application CDMP20230013. Lambert's needs assessment is broken into both the traditional needs assessment associated with CDMP Land Use Element LU-8F and the alternative needs assessment requested by members of the County Commission to determine the importance of a state-of-the-art Kelly Tractor new headquarters campus to critical community and economic needs, and Kelly's need to develop a headquarters facility on 150 net acres to serve the market and the broader community.

Key findings and page references for this technical memorandum are as follows:

- As with prior letters written by other consultants and submitted by the applicant in 2024 and 2025, the traditional needs analysis associated with LU-8F we have just completed with updated information clearly indicates that there is far too little industrial land in Miami-Dade County to support industrial space demands for the next 10 years inside the UDB. Likewise, the North Central Planning Tier and MSA 3.2 more specifically, also do not have adequate vacant or appropriate land to accommodate demand for modern industrial and distribution space over the next 10 years inside the UDB (*page 22*). This finding is inconsistent with county staff's own memorandum, but our analysis herein clearly shows that the staff assessment is based upon either incomplete data or is the result of ignoring the realities of developing county identified potential industrial properties in light of market trends in the County.
- Kelly Tractor, the Southern Florida distributor for Caterpillar ("CAT"), is the dominant providers of heavy infrastructure and construction equipment in South Florida as is CAT globally. Over the past 12 months Kelly has maintained greater than 40 percent market share, and inclusive of their wholly owned electric generator subsidiary, have generated $650 million a year in revenue from sales, rental, parts, and service of equipment on average over the past several years (*page 15*). U.S. headquartered Caterpillar (*NYSE: CAT*), the world's leading heavy equipment brand, is looking for its regional distributers to develop campus like facilities that better serve the needs of customers and best represent the quality and dominance of the brand. Caterpillar's long term business strategy, often cited as the reason for their global dominance, is to treat customers as partners by providing wraparound services well beyond sales, repairs, and parts. These services include operator training, storage/renewal and resale, as well as funding. The campus planned by Kelly is a state-of-the-art statement of CAT's market dominance but also is partially driven by the company's need to compete with increasingly strong Chinese competitors as the heavy equipment industry transitions to battery powered equipment, a technology where the Chinese currently maintain an edge. As an example, batteries and battery powered equipment requires substantially more indoor climate controlled storage space than diesel powered equipment of the past. Kelly's campus plans are organized to serve the battery driven powertrain transition well into the future, while Kelly's current headquarters facility, with its functionally obsolete buildings, is unable to accommodate these forward looking requirements over the next five to ten years.

Figure A: The Future – CAT Battery Powered Equipment

- Kelly Tractor's existing 55-year old headquarters is functionally obsolete with non-climate controlled buildings that lack dock height loading for trucks and is far too constrained to support its operations going forward.

Figure B: Examples of Functional Obsolescence of Current Facilities - Motor refurbishment in ground plain non-climate controlled building; Parts warehouse 2nd level catwalk.

- County staff have pointed out that more than 9 acres of land is available to Kelly for construction of a building on a vacant parcel owned by the company currently utilized for overflow storage. However, based upon zoning and functionality, a building designed for that site could be a maximum 150,000 square feet, loaded from only one side, and given the parcels location is separated from the primary existing Kelly facilities by a 65-foot wide busy three lane public right-of-way making its functionality limited for operations and far too small to accommodate the company's growth needs. From the community's perspective Kelly's growth needs include providing uninterrupted critical services during natural disaster/hurricane recovery, Everglades restoration, and support for key infrastructure projects including water/sewer improvements, the capital program at MIA, and Port Miami improvements (*page 11*).
- As it relates to hurricane recovery specifically, Kelly is a central player in the immediate support and restoration efforts following natural disasters, particularly following hurricanes. The new headquarters property, with over 100 acres of paved open space, equipment washing stations, service support, and central west location with ready highway access will serve as a key hurricane

recovery and restoration staging and service area for the entire county in the case of major storm events. As the distributor and lessor of CAT generators in the region through the Kelly's Pantropic subsidiary at any given time Pantropic has 100 generators with a combined 115 MW of generating capacity (equivalent to a midsized utility powerplant) located in its facility in Miami-Dade. The company is positioned to immediately deploy generators to support critical community and safety functions such as hospitals, nursing homes, municipal buildings, etc. Indeed, approximately 90 percent of the health care network in South Florida that have generators have installed CAT generators to provide power during periods when utility power is unavailable. In major storms, and indicative of CAT's "DNA" for partnership relationship with customers, during major storms Kelly technicians are stationed at hospitals which run CAT generators so that if there is ever an issue with the generator systems, service response is immediate. Likewise, for extended outages, Kelly maintains its own fleet of fuel trucks with 2,500 gallon capacity each in order to provide fuel to customers who cannot or are having difficulty getting fuel deliveries to feed generators following storms. During the last major storm to impact Miami-Dade, Hurricane Irma in 2017, Kelly not only deployed all of its generators; deployment of heavy equipment in inventory at its headquarters increased by more than 50 percent during the first 90 days following the storm (*page 11*). Not having an appropriate modern facility has the potential to leave gaps in Kelly's ability to service the needs of the community during these critical recovery periods.

Figure C: Kelly subsidiary Pantropic Power CAT generators ready to be deployed in event of natural disaster.

- As it relates to the Everglades Restoration, Kelly is the principal provider of construction equipment for the project and recently delivered 40 pieces of equipment to the most recent $1.0 billion phase of the project that will require double the amount of earth movement than during the construction of the Hoover Dam. Pantropic, the company's generator arm, has installed, maintains and services all of the pump station generators for the U.S Army Corps of Engineers associated with CERP. The western location of the new headquarters campus will allow the company to better access and serve the needs of the CERP (*page 12*).

Figure D: Kelly equipment at the Everglades Agricultural Area (EAA) Reservoir working to reduce harmful discharge from Lake Okeechobee and ensure clean water flow into the Everglades to the south in the future.

- The ability to connect the proposed campus to rail is another benefit of the new facilities. Rather than shipping and receiving product from the manufacturing plant by roadway, Kelly will now have the option for receiving and shipping new and used equipment by CSX rail, thereby reducing road trips. This is particularly important given much of the equipment requires wide loads and multiple truck trips versus what can be consolidated into a single rail trip. Additionally, rail will also help reduce the impact of wear and tear on the roads with the heavy engines and equipment that have higher than normal weight limits. Likewise, during times of natural disasters where road access is impeded or difficult, the link to rail will allow Kelly's sister network of distributors nationwide to deliver generators and equipment critical to the recovery effort via train vs. truck. This is expected to provide an alternative means and speed up the delivery of equipment in times of disaster and need.
- While CAT maintains a global network of distributors, given Kelly's location in South Florida, the company has long provided secondary inventory sales and parts support to CAT in the Caribbean Basin and Latin America. This is especially the case in peak times of need such as following natural disasters (i.e. earthquakes, hurricanes) but also when major shift in governance occurs in large potential markets as is currently the case in Venezuela. Rich in natural resources, both in petroleum and rare earth minerals, and in need of broadscale infrastructure renewal following decades of disinvestment, companies are rushing to Venezuela to support the redevelopment of the country and support the restoration of the petroleum and mining industries, two sectors where CAT is a dominant and critical player. Given the lack of a modern distribution network in Venezuela following decades of disinvestment, Kelly will be a central player in supporting the rebuilding of Venezuelan industry and infrastructure for the foreseeable future providing the network support needed for equipment, parts, and training. The new Miami HQ campus will be central to quickly and efficiently fulfilling this need, and will position Kelly to continue as the leading secondary supplier for the Caribbean and Latin America regions well into future as those regions continue to evolve and closed markets liberalize (*page 13*).

- Although population and household growth will slow over the next 35 years in the 13-county region which Kelly serves as the largest counties have decreasing amounts of land to support housing development, annual employment growth is expected to increase by nearly 20 percent and Earnings, Personal Income, and most importantly, Gross Regional Product (the broadest measure of regional economic expansion) will grow by more than double on an average annual basis between 2025 and 2060 above what it grew between 1970 and 2024. This substantial expansion of economic growth, significantly driven by inflow of capital, incomes, tourism and investment will drive new private construction, additional infrastructure investment, and related community facility expansion at a level not experienced in the past. For Kelly and CAT, this significantly enhanced expansion will drive new levels of demand for construction equipment throughout the region and is indicative of the need for significantly expanded facilities to accommodate that demand. Over the next 35 years Gross Regional Product in real terms (uninflated) is expected to grow by 2.3 times, total personal income by 2.2 times and earnings by 2.3 times. In that context, it appears entirely reasonable that Kelly is seeking to expand its indoor footprint by 2.8 times, and outdoor areas in the near term particularly given that the expansion will allow the company to consolidate several functions around parts, sales and storage and restoration of equipment that is currently occurring in satellite locations throughout the region (*page 14*).

Introduction

This Technical Memorandum (Memo), prepared by Lambert Advisory (Lambert) addresses two questions which have been raised by Miami Dade County staff and members of the Board of County Commissioners associated with the "need" for the proposed modification of the CDMP requested through Application No. CDMP20230013 submitted by Kelly Tractor Company.

The two requested "needs" assessments are distinct from one another.

The first Needs Assessment requested by the County is for Kelly Tractor to provide economic and market support to indicate that the company actually has a requirement for the 150 +/- net acres[1] available at the site subject of the application in order to build a proposed state-of-the-art campus and to describe how the new campus will better serve to support critical needs of the Miami-Dade community and key industries (i.e. Natural Disaster Response/Restoration, Everglades Restoration, Mining). This campus will replace the company's fifty (50) acre headquarter facility initially built 55 years ago and currently located along NW 58th Avenue west of the Palmetto Expressway in unincorporated Miami Dade County.

Kelly Tractor Headquarters: Current & Proposed Locations

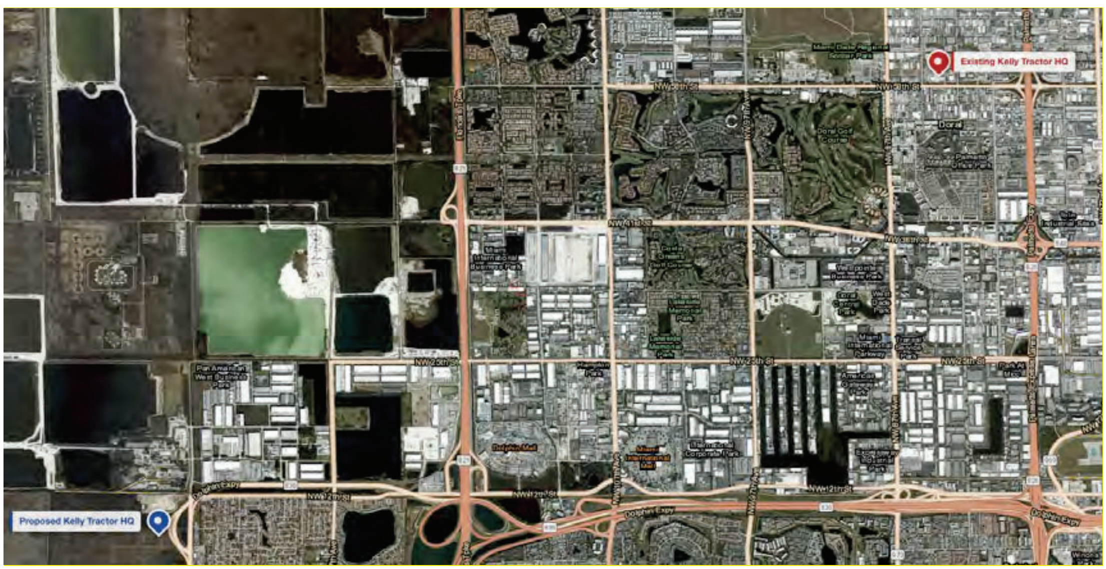

Figure 1. Current Kelly Tractor headquarters and proposed headquarters location in western Miami-Dade County

The second needs analysis, addressed and provided as part of this memo, is a *traditional* needs assessment associated with applications for expansion of development beyond the current UDB and is responsive to LU-8F of the CDMP's land use element. The *traditional* assessment is aimed at determining if existing land inside the UDB contains adequate commercial/industrial vacant land within County designated Planning Tiers and Minor Statistical Areas (MSA) to support the absorption of commercial/industrial space for the next 10 years. If not, the finding may provide a justification exists for expanding the boundary of the UDB to accommodate 10 years of growth. While we provide an updated *traditional* needs assessment as part of this memorandum, the applicant previously provided the *traditional* needs analysis associated with the application in 2024 with further backup provided in 2025. We have updated the traditional needs analysis

[1] Net acreage subtracts from gross acreage non-buildable or non-usable areas that are designated or designed for wetlands, retention, and expected ROW acquisition by GMX.

herein to further provide support to the prior conclusion that industrial land availability is inadequate for modern industrial development within the UDB during the next 10 years.

The Kelly CDMP submission requests the County allow for the development of a 246 +/- gross (150 +/- net) acre property as a state-of-the-art campus for Kelly's operations in an area located immediately outside of the Urban Development Boundary (UDB) but partially within the County's Urban Expansion Area (UEA). Details of Kelly's business model and operations in Miami Dade County are provided below, but Kelly has owned the proposed headquarters property since 1984 with the long term objective of relocating the company's operations to the site. The property is located just west and south of the current western terminus of the Dolphin Expressway (SR 836). Although SR 836 is currently an east/west expressway, the plan has long been to add a southern leg to the expressway. This southern turn to SR 836 is expected to require a significant right-of-way acquisition of the Kelly site.

This memorandum has been prepared to provide the update to the *traditional* needs assessment of broader land availability for industrial and related use and, in close coordination with Kelly Tractor Company, also answer the County's request to provide an evaluation of benefit to critical community objectives/needs and industry of the new campus and market support for the need of Kelly to develop the campus on 150 +/- net acres to replace the company's functionally obsolete 1970 era headquarters. The remainder of this memorandum details the analysis.

Needs Analysis I
Critical Community Need & Kelly Tractor Requirement for State-of-the-Art New Headquarter Campus on 150 +/- Net Acres

Kelly is the exclusive distributor for The Caterpillar Company ("CAT") covering 13 counties in southern Florida. CAT equipment accounts for approximately eighty (80) percent of Kelly sales.

It is impossible to appreciate the importance of a modern and functional Kelly Tractor facility to critical community needs and Kelly Tractor's need for an expanded headquarters campus given the rapid changes in battery and other technology in the heavy equipment sector without understanding the ecosystem model under which CAT operates as well as the importance of the company to natural disaster recovery, Everglades restoration, heavy construction, mining, international support of heavy equipment needs in the Caribbean Basin and Latin America, and the temporary and support power needs of South Florida.

The Caterpillar Company

Like few American manufacturers of large machinery that continue to manufacture in the United States, Caterpillar remains the global leader in its sector. With nearly 16 percent of global market share, 25 percent of the United States' construction equipment sales[2] , and an incredible 40 +/- percent of the heavy construction equipment market, CAT is the only true dominant global firm in its sector. As a benchmark, G.M. which has the most sales among autos and light trucks has only a 17 percent market share in the United States.

CAT is most comparable to Nvidia or Boeing as dominant American producers which have significant American manufacturing capacity and are leaders on a global scale[3].

CAT has always led by being the great innovator in equipment for the construction and mining industry, and enhancing efficiency and worker safety over the company's entire 100 years of being in business. Even before Caterpillar's formal founding, one if its predecessors, Holt, replaced wheels with tracks so that machinery would not sink in soft soil, mud, creeks and gullies and continue to be ubiquitous on construction equipment today. It was this innovation that by World War I provided military planners the technological solution necessary to design the modern tank, ultimately breaking the casualty heavy trench warfare stalemate that existed during the War.

In the early 1930's, CAT placed the first diesel engine in heavy construction equipment significantly enhancing the efficiency of the machines and creating the fuel and powertrain standard that has driven the entire industry since. During the same period, the yellow color found on construction equipment throughout the industry became a standard during a period where worker and operator safety became front-and-center of both CAT, their customers and government regulators.

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[2] The company with the second most market share, Komatsu has approximately 11.2 percent of the market, followed by John Deere with 5.5% and the Chinese XCMG with 5.4 percent. Both XCMG and Sany, the 4th and 7th ranked construction equipment companies now have U.S. headquarters in Georgia with a core focus on the Southeastern U.S. market in direct competition with CAT.

[3] Apple iPhone and Cisco as American products also are similar in terms of global dominance but manufacture a very small percentage of their product in the United States; even Nvidia contracts with 3rd parties in the U.S. for the company's chip production.

In the subsequent 80- to 90-years, CAT has continued as the dominant force in construction equipment innovation developing hybrid engines for greater fuel efficiency, on board computers and cameras to monitor efficiency/improve safety and provide 360-degree visibility, and GPS systems to guide equipment and ensure material, buildings and sites are built exactly to plans and specifications.

Today, the biggest challenge that CAT is tackling from a technology perspective since the first diesel engines in the 1930's is the transition from diesel to battery powered engines which have the range, power and capacity to drive the equipment which is so central to the success and future of the construction and infrastructure industry. Unlike the past however, where innovation in the industry was almost always driven by CAT, CAT is now facing two Chinese competitors who have the benefit of China's recent dominance in battery technology, production, and infrastructure purpose built for the needs of battery driven machines and equipment (charging speed, adequate storage, replacement/repair facilities, etc.). Both competitors now have North American headquarters in Georgia with the goal of expanding rapidly in the U.S. market. With the exception of necessary enhancements to the electric grid, the Chinese competitors can easily apply these innovations to facilities which will be built throughout the United States to better serve customers, leaving legacy facilities serving CAT or John Deere well behind on the technology curve. These facility enhancements include climate controlled facilities to maintain maximum battery performance and capacity, facilities which are designed for rapid swapping of batteries in machines, and repair and maintenance facilities specifically designed for battery driven propulsion rather than diesel propulsion.

As it relates to Kelly, the proposed headquarter campus is designed for the future not the past and includes key components which will allow the CAT and Kelly to be competitive with international manufacturer competition well into the future of electric based heavy equipment. The functional obsolescence of the current headquarters facilities makes it impossible for Kelly to provide these components within the current operating envelope and building structure. These components include the following with more detail provided further in our report.

- Significantly expanded indoor space for battery and other technology which require shading from direct sunlight and climate control to maintain peak performance. The is not only about the future, but current needs. At any given time, as much as 100 electric forklifts on the Kelly site are being stored in outdoor uncovered space. This storage significantly impacts the battery performance and life of the forklifts. As larger equipment converts to battery and hybrid technology, the demand for indoor space will only be exacerbated.

Figure 2: Less than optimal storage of electric forklifts due to lack of indoor space

- Operator training demands are expected to expand substantially as the equipment transitions from diesel to battery technology. The new campus is designed with expanded training space, but in classrooms/simulators and outdoor areas to accommodate this transition and need for expansive training of operations from both the region, Caribbean, and parts of Latin America.
- As the technology transitions, long time operating partners will be trading in older equipment for new machines and Kelly is expecting that the resale business to markets outside of the United States, particularly in the Caribbean and Latin America, will expand as well. The campus is designed to accommodate significantly more used equipment for both refurbishment and resale to a much broader market area.

All of this needs to be understood in the context of the CAT operating model and its focus on customer experience and service. What has always set CAT apart from its competitors and often cited as the reason for its dominance is, like Boeing, CAT has a long history of establishing deep partnership with its customers and an established ecosystem around that partnership. Beyond sales of construction equipment and service, this partnership extends to training of operators for maximum efficiency and the integration of new technologies, safety procedures and systems, storage of customer equipment when not mobilized, refurbishment and resale of equipment on the global market when machines are no longer required, rental of equipment for short term use, power generation where utility infrastructure is inadequate or in time of natural disasters, shipping and delivery of equipment among other services.

While Boeing establishes relationships directly with airlines at a corporate level, CAT has a long established network of regionally defined distributorships which provide many if not all of those ecosystem services and programs. Kelly Tractor has long been CAT's distributor for the 13 counties in South Florida which are home to nearly 40 percent of the State of Florida's population and more than 41 percent of the State's employment.

Beyond the technological change to electric machines detailed above, the following highlights the market and economic conditions which are driving the need for Kelly Tractor's expansion and the inadequacy of the existing headquarters to drive that growth and support the critical needs of the community. We also detail the need to build facilities which will allow CAT to support its ecosystem in South Florida, support critical needs of the Miami-Dade community, maintain its dominance over international quickly expanding competitors in the U.S. market, and highlight the severe constraints of the existing headquarter facility and land holding to support that growth.

As noted earlier, Kelly serves a 13-county region for CAT products from its 1971-era 50 acre functionally obsolete headquarters facility in Miami Dade, with the 50 acres bifurcated by a number of busy public rights-of-way. Currently, including offices and indoor space for parts, service, and other related functions the existing campus has approximately 376,000 square feet of indoor floor area when a catwalk mezzanine is accounted for in the parts warehouse. As the current March 2026 plan which has been submitted to the county indicates, the plan for the new campus in the near term is to build approximately 1.04 million square feet of modern dock height loading space with appropriate truck wells and climate control as necessary (2.78 times the amount of indoor space at the existing HQ facility) to accommodate growth in service, parts, storage, office, and training and consolidate components of regional operations[4] onto the single state-of-the-art campus. The current plan calls for a significant expansion of both indoor and outdoor space. To accommodate the 13 county region's customer base, Kelly also has eight (8) other facilities throughout the region with an additional 124.07 acres (175 +/- acres in total including the HQ in Miami). While some of the operation of these satellite facilities, for example service and repair and sales of smaller equipment such as forklifts, needs to be located close to the customer base, much of the fragmented nature of the Kelly operation sprawled across multiple counties has been driven by the size and logistical limitations of the headquarters facility and property. For example, storage and concurrent rehab/restoration of equipment, sales of heavy new and used equipment, and similar functions would be better coordinated and served out of an adequately built state-of-the-art single headquarters facility rather than spread across a massive region. Likewise, the response to natural disasters with generators and other heavy equipment and the company's central role in supporting the Everglades Restoration are better coordinated via the headquarters facility. Kelly already utilizes a small fleet of "night trucks" to move equipment across the region when traffic volumes are lowest and with the development of a modern facility on the new Kelly campus this nighttime routing will easily be expanded to serve the entire region from the no longer constrained operations at the new headquarters. Likewise, the ability to tie the headquarters campus to CSX rail will allow for the delivery of heavy equipment to and from the site without placing additional burden on the regional road network. Given expected changes over time in the ratio of indoor vs. outdoor space which includes the fast emergence of electrification of heavy equipment fleets and batteries which must be maintained and stored in climate controlled settings, Kelly's CDMP application requests approval for more built space than indicated on the site plan to accommodate the future needs of the industry.

Kelly Tractor & CAT – A Critical Community Resource

In addition to broad economic trends, further detailed below, that will support the development and expansion of the Kelly new headquarters campus in the planned location, Kelly is a critical community resource for a range of needs and industry, some of which may not be immediately obvious. There is a range of government support operations, industries, and billions of dollars in specific South Florida major infrastructure investments already underway or planned, which rely on partnerships with Kelly and CAT. These include the following:

Natural Disaster/Hurricane Recovery & Staging – Kelly is a central player in the immediate support and restoration efforts following natural disasters, particularly following hurricanes. The new headquarters property, with over 100 acres of paved open space, equipment washing stations, service support, and central west location with ready highway access will serve as a key hurricane recovery and restoration staging and service area for the entire county in the case of major storm events. As the distributor and lessor of CAT generators in the region through the Kelly's Pantropic subsidiary at any given time Pantropic has 100 generators with a combined 115 MW of generating capacity (equivalent to a small utility-scale or peaking-power powerplant) located in its facility in Miami-Dade. The company is positioned to immediately deploy generators to support critical community and safety functions such as hospitals, nursing homes, municipal buildings, etc. Indeed, approximately 90 percent of the health care network in

[4] Although not smaller equipment sales and service function which still must be located closer to customers across the region.

South Florida that have generators have installed CAT generators to provide power during periods when utility power is unavailable. In major storms, and indicative of CAT's "DNA" for partnership relationship with customers, Kelly technicians are stationed at hospitals which run CAT generators during major storms so that if there is ever an issue with the generator systems, service response is immediate. Likewise, for extended outages, Kelly maintains its own fleet of fuel trucks with 2,500 gallon capacity each in order to provide fuel to customers who cannot or are having difficulty getting fuel deliveries to feed the generators following storms. Additionally, through the CAT distributor network, Kelly has an established protocol for leveraging the sister distributor network for hundreds of additional megawatt capacity within a 48-72 hour period following a storm. During the last major storm to impact Miami-Dade, Hurricane Irma in 2017, Kelly not only deployed all of its generators; deployment of heavy equipment in inventory at its headquarters, increased by more than 50 percent during the first 90 days following the storm. The additional indoor and outdoor space planned for the new Kelly Headquarters site will allow the company to significantly expand local inventory of the critical power and mechanized equipment necessary for post storm recovery and restoration.

Everglades Restoration Project (CERP) – The 25 year budget for CERP has grown from $7.8 billion to over $23 billion. Kelly is the key provider of construction equipment for the project and recently delivered 40 pieces of equipment to the most recent $1.0 billion phase of the project that will require double the amount of earth movement than during the construction of the Hoover Dam. Pantropic, the company's generator arm, has installed, maintains and services all of the pump station generators for the U.S Army Corps of Engineers associated with CERP. Kelly will continue to be the major equipment provider for the project through completion particularly with the Buy America provisions of CERP funding, and the western location of the new headquarters campus will allow the company to better access and serve the needs of the CERP.

Mining – The mining industry continues to be a major generator of economic activity in South Florida (particularly Miami-Dade, Lee, Palm Beach, and Charlotte counties) with substantial economic output and employment. The industry is almost exclusively dependent upon Kelly and CAT to provide and maintain equipment that cannot just be "brought into the shop" for regular maintenance and repairs given the fact that many of the pieces are larger than a single family home. Proximity to mining operations in Northwest Dade, Lee, and Palm Beach will be a key benefit of the new headquarters location.

Private Construction – Kelly continues to be the leading provider of large scale construction equipment to builders of privately funded buildings and facilities. Kelly had more than $333 million in average annual sales or rentals between 2023 and 2025 in construction equipment in South Florida. As the region grows consistent with the data presented below, the needs of the private sector construction market for new, used and rented equipment will expand as well. This is enhanced by the potential rail access for the proposed headquarters site which will allow for more efficient delivery of large equipment throughout the 13 county region which have difficultly being shipped due to size and weight on the county's road network.

Miami-Dade/FDOT Infrastructure Improvements – The $9.0 billion MIA Modernization in Action capital improvement effort, Port Miami capital program, FDOT's expansive improvement and repaving program in the County, and billions of dollars of WASD water and sewer improvements over the next few decades all will rely heavily on CAT equipment. As important, maintaining project schedules requires maintenance of equipment and ready access to service in a timely manner. The expanded facilities and staff at the new headquarters project will assure that the wait or downtime associated with repairs or maintenance of equipment will be minimized.

International Sales, Parts & Training – Although the Caribbean and Latin America are not part of the Kelly region, Kelly does maintain a robust market for the shipping of parts to the region and advanced training of skilled operators from the international region on new equipment. A new headquarter facility will allow for an expanded export market for parts and shipping, but has also been designed to serve as the main training center for the entire Caribbean basin. With flights, hotel nights, and ancillary expenditure, the training components of the state-of-the-art headquarters facility will be a major economic driver of inflow expenditure in the region, better tie international uses over the long term to CAT and Kelly, and serve as an important ancillary revenue driver for the company. This is especially the case in peak times of need such as following natural disasters (i.e. earthquakes, hurricanes) but also when major shift in governance occurs in major potential markets as is currently the case in Venezuela. Rich in natural resources, both in petroleum and rare earth minerals, and in need of broadscale infrastructure renewal following decades of disinvestment, companies are rushing to Venezuela to support the redevelopment of the country and support the restoration of the petroleum and mining industries, two sectors where CAT is a dominant and critical player. Given the lack of distribution network in Venezuela following decades of disinvestment, Kelly is already being positioned as a central player in supporting the rebuilding of Venezuelan industry and infrastructure for the foreseeable future providing the network support needed for equipment, parts, and training. The new campus will be central to quickly and efficiently fulfilling this need, and will position Kelly to continue as the leading secondary supplier for the Caribbean and Latin America regions well into future as those regions continue to evolve and closed markets liberalize.

Market & Economic Conditions Driving Need For Expansion

Although the new Kelly headquarters campus is planned for western Miami-Dade County, our evaluation of future growth focuses on the 13-county region which Kelly serves as the CAT distributor given that the headquarter campus and its operations are being built as a facility that will serve the entire region and not just Miami-Dade. Of note, within the 13 county region currently Miami-Dade, Broward, and Palm Beach counties combined account for 73 percent of the region's population, 77 percent of employment of the region and 71 percent of economic activity as measured by gross regional product. Over time there will be a modest downward shift in the ratio of population in the three large counties within the region given modest levels of available land for development in the largest counties compared to St. Lucie, Lee, or Indian River (as examples), but for the projection period within our analysis of 2060, the three counties are expected to actually grow in terms of economic activity with the three counties accounting for 79 percent of employment and 80 percent of gross regional product by 2060.

The following table compares the history between 1970 when the existing Kelly headquarters was built and 2024 vs. a projection between 2025 and 2060 of the key economic factors that research has indicated in some combination thereof are most likely to be predictors of future demand for construction and infrastructure investment. The history is provided and projections completed by Woods & Poole Economics at a county level. All dollar figures, historic and projected, are in adjusted real 2017 dollars so that inflation is not a factor in comparing trends over the long term projection period. Lambert has combined the county level data into the 13 county region for which Kelly serves as the exclusive CAT distributor.

	1970	2024	2025	2060	Avg Annual Change 1970-2024	Avg Annual Change 2025-2060
Total Population (,000)	**2,634.7**	**8,860.3**	**8,947.6**	**11,916.6**	**115.29**	**84.83**
Total Households (,000)	**908**	**3,508**	**3,557**	**4,790**	**48.15**	**35.23**
Total Employment (,000)	**1,212.1**	**6,131.2**	**6,216.9**	**10,142.8**	**91.09**	**112.17**
Total Earnings (million 2017 $)	**$43,949**	**$320,050**	**$327,481**	**$738,773**	**$5,112.98**	**$11,751.21**
Total Personal Income (millions 2017 $)	**$62,042**	**$608,663**	**$625,874**	**$1,400,112**	**$10,122.61**	**$22,121.07**
Personal Income per Capita (2017 $)	**$23,548**	**$68,695**	**$69,949**	**$117,493**	**$836.05**	**$1,358.40**
Gross Regional Product (million 2017 $)	**$69,462**	**$573,181**	**$586,906**	**$1,339,433**	**$9,328.13**	**$21,500.76**

Source: Woods & Poole Economics; Lambert Advisory

Figure 3: 13-County Region Total & Annual Average Growth - Primary Factors that Drive Demand for Construction Historic (1970-2024) and Projection (2025 to 2060)

What the table in Figure 3 above indicates is that while population and household growth will slow over the next 35 years in the region as the largest counties have decreasing amounts of land to support housing development, annual employment is expected to increase by nearly 20 percent and Earnings, Personal Income, and most importantly, Gross Regional Product which is the broadest measure of regional economic expansion will grow by more than double on an average annual basis than it did between 1970 and 2024. This substantial expansion of economic growth, significantly driven by inflow of capital, incomes, tourism and investment will drive new private construction, additional infrastructure investment, and related community facility expansion at a level not experienced in the past. For Kelly and CAT this significantly enhanced expansion will drive new levels of demand for construction equipment throughout the region and is indicative of the need for significantly expanded facilities to accommodate that demand. As the table above indicates, over the next 35 years Gross Regional Product in real terms (uninflated) is expected to grow by 2.3 times, total personal income by 2.2 times and earnings by 2.3 times. In that context, it appears entirely reasonable that Kelly is seeking to expand its indoor and outdoor footprint by 2.8 times in the near term particularly given that the expansion will allow the company to consolidate several functions around parts, sales and storage and restoration of equipment that is currently occurring in satellite locations throughout the region.

Maintain Presence & Dominance Over Global Competitors Locally

The graph below illustrates the Kelly Tractor's average annual sales broken down by category between 2023 and 2025. In sum, Kelly sales averaged more than a 1/2 billion dollars per year over the 2023 to 2025 period, nearly 50 percent of which were made in Miami-Dade County.

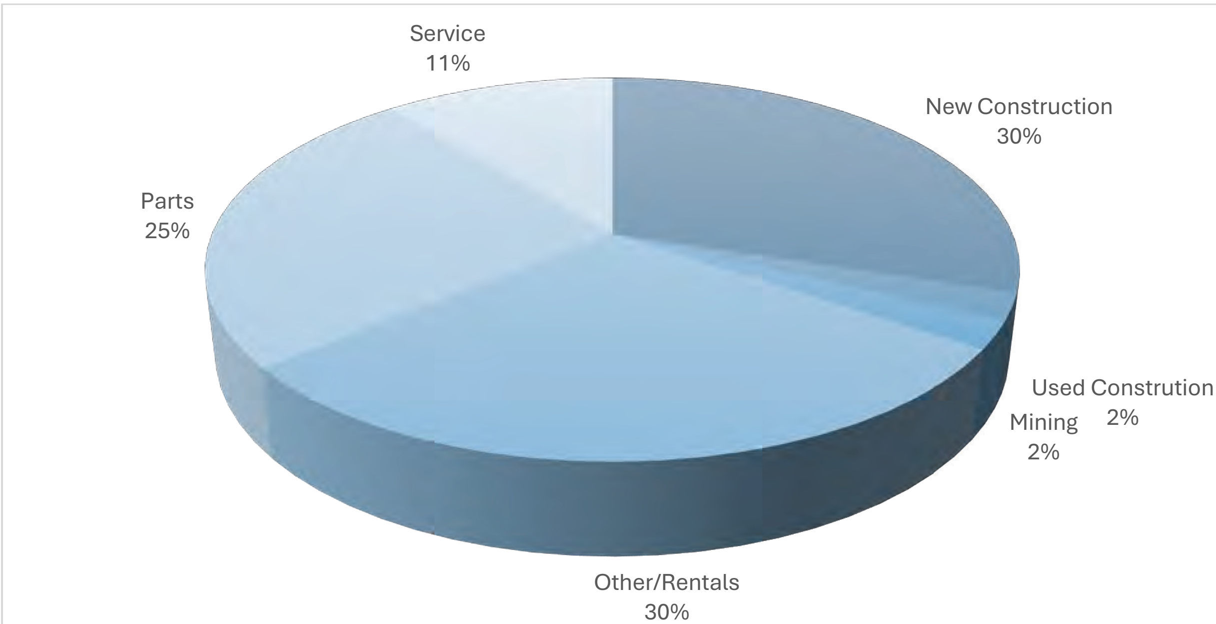

Figure 4: Kelly Tractor Average Annual Sales By Type (2023-2025)

Source: Kelly Tractor

In addition to the sales above associated with Kelly, Pantropic Power, a CAT generator subsidiary of Kelly, had an additional $100 million in sales in 2025 including parts, service, equipment, and rentals.

Between Pantropic and Kelly, total sales were in excess of $650 million a year during the past several years.

It is difficult to overstate how important Kelly and CAT are to the South Florida construction industry and infrastructure investment in general. Over the past 12 months, Kelly had 41 percent market share of the large scale Global Construction Infrastructure (GCI) equipment sold in the South Florida market and 37 percent in Miami Dade, by far the largest county in terms of sales in Kelly's 13-county region.

Kelly and CAT's dominance in South Florida is not because the competitors are not working the market or lazy. Komatsu, the second largest equipment manufacturer in the world, is constantly striving to catch up. XCMG and Sany, the leading Chinese manufactures while currently far behind in Florida market share, have established North American headquarters in neighboring Georgia and as with many Chinese manufacturing companies have an incredible ability to improve the quality of products over a few short years and deliver at lower costs. This will particularly be the case as the heavy construction equipment industry transitions from diesel to advanced battery technology, a particular strength among Chinese producers.

In order to continue to compete at the premier level and concurrently provide the high level of integrated services which set them apart for their customers and communities in which they operate, Kelly/CAT have made the determination that they need an expanded state-of-the-art campus which represents their brand values, strength, and can support their ecosystem model which includes ongoing partnership with customers well beyond sales and service to include training, storage, restoration, and life cycle management of equipment assets. All of those components can be found in the plan which Kelly has submitted to the County. The facilities are best-in-class and project the strength of the brand to the market dominance which Kelly and CAT have achieved. To expect Kelly and CAT to deliver all of these services from a functionally obsolete, 55-year-old facility bisected by public rights-of-way—with severe site constraints that limit their ability to serve customers at the standard those customers now demand—is simply not realistic.

The footprint proposed in the campus expansion reflects the operational needs of a full-service heavy equipment and power systems dealer serving a large regional market. In major U.S. growing markets, CAT is expecting regional distributors to establish campus like facilities which provide a wide array of co-located services and support for their partner contractors, from sales to service training to storage and rehabilitation to parts and more. The goal is a brand statement and enhanced level of customer service that will allow Caterpillar to continue to express its partnership DNA and continue to dominate over its quickly expanding and innovating Chinese competitors which are now focused on the U.S. market as a centerpiece of their global long term growth strategy.

For reference, there are several examples throughout the country of regional distributors who have built campuses that meet the current and looking forward brand and customer service objectives of CAT, provide for the full range of services and needs of customers and serve as models for what Kelly is seeking to achieve in Miami Dade County. These include the following.

Holt Caterpillar Headquarters - San Antonio, Texas

Holt has been in business for over 85 years and has a regional and international perspective on its future growth. The company recently developed a 140 plus acre state-of-the-art campus to serve its market and support the northern Mexico market for the next generation. The campus includes sales, parts distribution, storage, corporate headquarters building, service and other components located throughout the campus with significant room for expansion.

Figure 5: Holt Caterpillar 85,000 square foot HQ Building – San Antonio, TX

Figure 6: Holt Caterpillar HQ 140-acre Entrance – San Antonio, TX

Figure 7: Holt Caterpillar HQ 140-acre +/- Campus - San Antonio, TX

Ring Power Headquarters – St Augustine, Florida

Ring has been a Caterpillar dealer for over 60 years and is the regional distributor for North Florida. While the company has several smaller facilities scattered throughout north Florida, Ring principal operates out of its 85 net acre central campus in St Augustine that is the center point of the company's sales, major restoration/repair, training and corporate operations and is designed to support the entire North Florida network of facilities with parts and supplies for their customers.

Figure 8: Ring Power HQ Building – St. Augustine, FL

Figure 9: Ring Power HQ 85 Acre (Net) Campus – St. Augustine, FL

Figure 10: Ring Power Campus Modern Climate Controlled Supplies Warehouse – St Augustine, FL

Kelly's plan is to build the next generation of campus facility even beyond what Holt and Ring have created in San Antonio and North Florida to accommodate the important technological and powertrain advances which will allow the construction equipment business to evolve into the future.

Key operational components of Kelly's Plan include:

Indoor Parts & High Value Storage Warehousing
Current Facility: 132,000 square feet + "2nd floor" catwalk
New Campus: 368,000 square feet for parts and high value equipment storage

Large indoor storage facilities are required to maintain extensive parts inventories that support rapid service turnaround and minimize equipment downtime for customers. Caterpillar's dealer model emphasizes immediate parts availability and direct access to dealer inventory as critical components of customer support. Inventory breadth and indoor storage: A larger parts and equipment inventory reduces downtime for customers and supports faster repair cycles. Expanded indoor storage also protects high-value components from weather exposure and reduces loss/obsolescence risk.

Service and Maintenance Facilities
Current Facility: 47,000 square feet
New Campus: 282,000 square feet main plus 30,000 square feet satellite building for peak demand

Heavy equipment maintenance requires large service bays, overhead cranes, specialized tooling, and space for diagnostics, repair, rebuilding, and testing. The expansion program significantly increases service capacity to support a growing regional equipment fleet and reduces service turnaround times. Improving service capacity and turnaround time by having dedicated, expanded service buildings (including multiple service components) increase bay count, allow workflow separation (diagnostics, heavy maintenance, warranty work, and quick-turn repairs), and improve scheduling reliability during peak seasons. This nearly seven-times expansion of space also allows for the specialized service and replacement needs of battery operated equipment the key battery components of which will be stored in the service and matenance facilities rather than in the parts warehouse.

Covered Equipment Storage
Current Facility: 21,000 square feet
New Campus: 101,000 square feet

Covered storage protects high-value machinery, engines, and generators from weather exposure while allowing equipment to remain staged and ready for deployment.

Administrative and Training Facilities
Current Facility: 27,000 square feet office and training
New Campus: 150,000 square feet office plus 18,000 square feet training center

The proposed office and training components support workforce development, technician training programs, dispatch operations, and customer support services.

Caterpillar and other major equipment manufacturers emphasize the importance of dealer-based technical training and continuing education for technicians and operators. Dedicated training facilities therefore represent a necessary component of modern heavy equipment service campuses.

Truck/Heavy Equipment Sales & Rentals
Current Facility: 141,000 in non-climate controlled structures and outdoors areas
New Campus: 80,000 square feet climate controlled showrooms/retail plus outdoor areas

Architecturally designed customer oriented sales showrooms that serve to showcase the latest innovations in equipment and products. This is anticipated to include areas for ancillary commercial sales of CAT branded merchandise as well as food and beverage service for both customers and staff.

Forklifts
Current Facility: 23,000 indoor service plus outdoor storage
New Campus: 117,000 indoor service and storage

Transition from outdoor to indoor space to store and service battery vs. gas fueled forklifts.

Outdoor Training, Demonstration, Storage and Staging Areas
New Campus: 20 acres not including over 580 spaces for truck parking and storage

The outdoor areas shown on the Conceptual Site Plan are not passive land uses. Rather, they function as essential operational components of the campus. Outdoor operational areas support:

1. Equipment storage and display
2. Fleet staging and dispatch preparation
3. Truck and trailer circulation and transloading
4. Demonstration and training activities
5. Equipment inspections and testing

Heavy construction equipment requires significant maneuvering and staging space due to the size and operational characteristics of the machinery. Adequate outdoor yard areas are therefore necessary to maintain safe circulation patterns, separate customer traffic from operational zones, and allow for efficient fleet management. The Conceptual Site Plan provides these operational yards while also maintaining designated stormwater management areas and preserved environmental features.

Needs Analysis II :Traditional Needs Assessment for Land to Support Industrial Development

Lambert Advisory has completed a Need Analysis associated with the Kelly Tractor proposed expansion plan (Kelly expansion). Specifically, Kelly Tractor is seeking to relocate and expand its headquarters within a 247 +/- acre site located at NW 137th Avenue and the Dolphin Expressway. The plan generally includes but is not limited to: indoor storage and facilities for sales, training and administrative operations; more than 500 truck parking spaces; gas pumps and maintenance areas; and large outdoor covered and uncovered equipment storage areas.

The proposed expansion is integral to the growth and competitiveness of one of the largest and most recognized Caterpillar equipment dealerships in Florida and necessary to maintain Kelly's presence and job support for residents of Miami Dade County.

Relevance of Policy and Specific Need

The Needs Analysis herein is intently focused on the industrial land use sector. Policy LU-8E of the Comprehensive Development Master Plan ("CDMP") provides that amendments to the CDMP Land Use Plan map must satisfy a "deficiency in the . . . map to accommodate projected population or economic growth of the County."

Adequacy of non-residential uses "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 testing of the adequacy of capacity for non-residential uses depends on the nature of the use. For larger commercial uses and all industrial uses, the capacity of "Tiers, Half-Tiers and combinations thereof" will be considered, along with countywide supply." For "neighborhood- and community-oriented business and office uses," which are intended to serve a smaller area, adequacy of capacity will be "determined on the basis of localized subarea geography such as Census Tracts, Minor Statistical Areas (MSAs) and combinations thereof."

The needs assessment herein follows a previous needs analysis prepared by Miami Economic Associates (MEA) in August of 2024 and further information to back up the needs analysis as part of a letter prepared by MEA in July 2025. Those letters, along with the County's response and feedback, have been thoroughly reviewed and the analysis herein is mindful of the County's input and concerns. While there are elements of the analysis completed within the previous application that we consider to be standard procedures for evaluating supply and demand conditions underlying the determination of "Need," this updated assessment considers findings as of April 2026 and additional metrics that will provide supplementary support the evaluation of the current application.

There are two distinct components to the Kelly Tractor Needs Analysis: first, is a discussion of the broader industrial market conditions within Miami Dade County and, specifically, the relatively dire constraint on industrial land supply that not only directly affects the proposed Kelly Tractor expansion plan, but also the sustainability and growth of the broader industrial sector that is absolutely critical to Miami Dade County's economy; and, second, an in-depth evaluation of industrial land conditions and limitations in and around the Kelly Tractor expansion site (local area conditions) that must be considered in the overall needs assessment.

Broader Industrial Market Conditions

The industrial real estate market in Miami–Dade County is among the most active industrial/distribution markets in the US. It is widely viewed by leading US industrial development, brokerage and industry professional to be a top performer as it relates to occupancy stability and rental rate growth during the past several years.

The County's industrial development sector is not far removed from record breaking levels of addition to supply with 6.5 million square feet of space delivered in 2024 alone. Despite such a large amount of space being added to the market, occupancy remained in the 95 percent range and rental rates remain at levels that are among the top 10 markets in the US.[5] By year-end 2025, concerns among some industry representatives that were raised about overall stability and longevity have been abated considering that there is roughly 4.0 million square feet of space currently under-construction and future forecast for demand remains strong.

Suffice it to say that economic and real estate markets naturally ebb and flow over long periods of time. However, there is limited evidence, if any, that the long-term growth prospects for Miami Dade County's industrial market sector would significantly moderate from trends that have been building over the past 20 years. With continued regional population and investment growth, as well as projected significant increased cargo throughput at both Port Miami (through 2035) and MIA (through 2040), the biggest threat to the industrial market is that there is little available high quality functional industrial land Countywide to support this growth in the future.

There are numerous development trends and conditions that indicate the need for significant additional land to support sustainable industrial growth in Miami Dade County particularly within the central planning tiers.

The following provides an overview and summary finding of several key factors supporting the need for broader industry sector growth:

Industrial Building Footprints Continue to Expand

Industrial buildings across the United States have grown dramatically in scale over the past decade, and the trend shows no signs of slowing. This expansion is being driven by powerful structural forces: the surge in high-tech manufacturing projects and automation in distribution which have allowed larger and taller distribution buildings to be operated more efficiently. Likewise, there has been a strategic shift among developers toward larger assets that deliver stronger returns. The continued rise of e-commerce has only intensified demand for large fulfillment and distribution centers, accelerating this shift nationwide.

CoStar data clearly illustrates this transformation. Across the U.S., the average size of industrial buildings delivered in the past 10 years has increased steadily at the national, state, and county levels. Miami-Dade County specifically is similarly experiencing an increase in size of new industrial buildings. For years, the average newly built industrial building in the county remained below 120,000 square feet. That changed notably beginning in 2021. By 2022, the average new building size averaged above 180,000 square feet, moderating to roughly 142,000 square feet in 2025.

[5] Cushman & Wakefield: Market Beats US Industrial (Q3 2025)

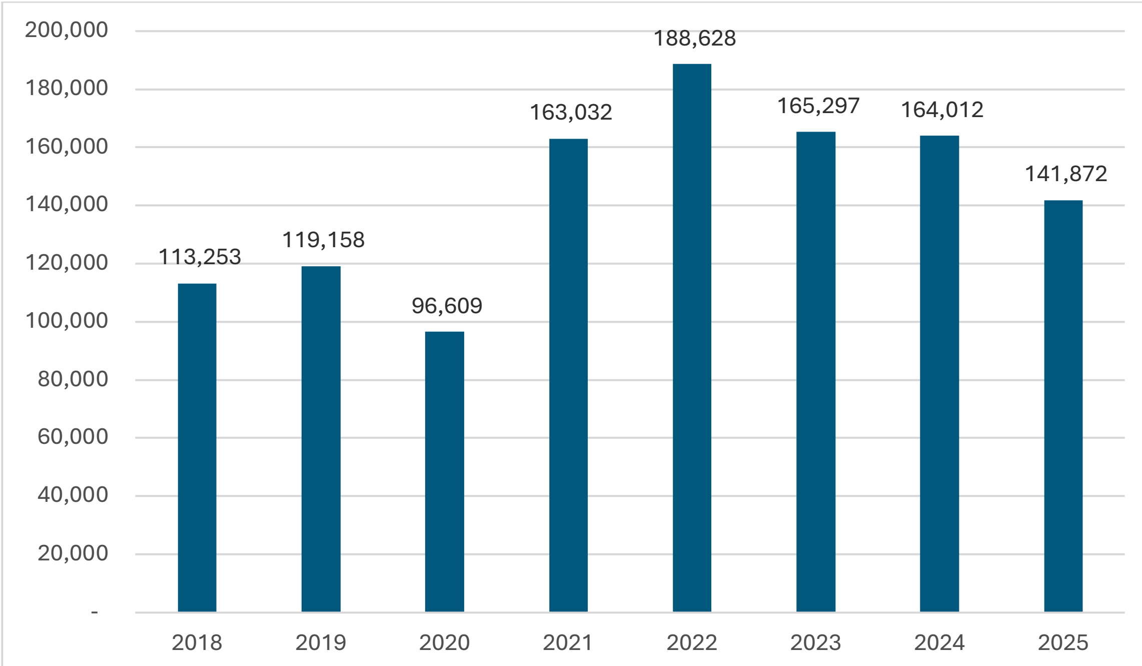

Figure 11: Average Industrial Building Size (Square Feet) in Building Built in Past 10 Years Miami Dade County (*Source: Costar)*

The average industrial building built over the past 10 years was nearly 132,000 square feet in size Comparatively, the average industrial building size in the decade prior was 46,200 square feet. This trend is unlikely to change. According to Costar, there are 24 industrial buildings currently under-construction in Miami Dade County, with an average building size of **169,000 square feet**—a clear break from historical norms.

But more compelling evidence lies in the distribution of new supply. Of the 43± million square feet of industrial space built in Miami-Dade during in the past decade, 38± million square feet—85+% of all new inventory was delivered in buildings larger than 120,000 square feet. Even by building count, more than half of all new industrial properties exceeded this threshold.

While there is no question that there will be continued demand for small-bay industrial product developed for niche uses such as auto repair, localized storage, and small-scale manufacturing, it now represents a marginal component of the county's total industrial deliveries. The market has shifted toward large, modern, high-capacity facilities; aligning Miami-Dade with national trends and positioning it as a leading hub for large-format industrial development.

Miami Dade County – Industrial Development Trends and Future Demand Remains Strong

Following is a highlight of historical industrial development trends in Miami Dade County, along with key demand factors impacting development during the next 10 to 15+ years based upon Costar data:

- In Miami Dade County, there has been 43.7 million square feet of industrial space built in the past 10 years, an average annual addition to industrial supply of nearly 4.4 million square feet.

- In 2025 alone, the County added 3.3 million square feet of industrial space in 23 buildings (averaging more than 143,000 square feet per building). This follows the addition of 6.4 million square feet in 2024 — the highest level of addition-to-supply in County history. Though 2025 marked a modest slowdown in development pace from years prior, there is currently 4.0 million square feet of industrial space currently under-construction in Miami Dade County, the vast majority of which is anticipated to be delivered by the end of 2026. These new developments are averaging 169,000 square feet per building.
- Despite the extraordinary addition to the industrial stock in 2024, vacancy rates are just above 6.0 percent. Accordingly, total leasing activity for 2025 reached 16.2 million square feet which is far and above the 11.5 million square feet of leasing activity in all of 2024.
- In the 5-years prior to the pandemic, average rental rates increased from $8.62 per square foot to $10.70 per square foot (NNN), or an average annual growth rate of 4.4 percent. From 2021 to end-of-year 2025, rents increased from $11.65 per square foot to $16.40 per square foot (NNN), or an average annual growth rate of more than 8.9 percent. Rental rates did reach more than $17 per square foot at the end of 2023, before dropping to $16.11 at the end of 2024 as the market added unprecedented amounts of supply. Overall, however, rental rate trends are clearly positive over the near to mid-term particularly in light of the land constraints to accommodate new modern industrial development.

In terms of future industrial development outlook, industrial and distribution employment is forecast to remain relatively strong during the foreseeable future albeit more moderate than previous periods. Costar (jointly with Oxford Economics) prepares estimates of industrial sector job growth and additions to industrial supply over a 10-year forecast period. Key findings indicate:

- At year-end 2025, the County's industrial sector employment is 110,527 and forecast to increase by 7,863 total industrial sector jobs over the next 10 years; or 0.8 percent average annually; and,
- Costar's forecast for new industrial supply indicates an increase of 29.4 million square feet over the next 10 years, which equates to an average 2.9 million square feet per annum on average (an average of 1.1+ percent annual growth rate).

Recent Industrial Land Conditions Assessment prepared by Miami Dade County

In July 2025, Miami Dade County Regulatory and Economic Resource's Department (RER), RER published its *Projected Absorption of Industrial Land* analysis (referred to herein as RER 2025 analysis). At that time, less than 10 months ago, the RER 2025 analysis indicated that there was 1,245 acres of vacant industrial land remaining in all of Miami Dade County. Accordingly, the County projected that 145 acres would be absorbed annually on average through 2040. As a result, RER indicated that the entire inventory of vacant industrial land in the County would be depleted by 2033.

The County's evaluation of industrial land absorption in July 2025 does not even closely match recent historical absorption and development trends, or future demand as outlined in the Section above. This considers the fact that if an industry standard metric of 35 percent building-to-land coverage is utilized to convert historical and/or future industrial space demand to land utilization, under the County's absorption of 145 acres per year total industrial building development would average 2.2 million square feet per annum. This is nearly one-half of the more than 4 million square feet each year on average built during the past 10 years; and, also, well below the average annual 2.9 million square feet forecast by Costar over the next 10 years. Even if the coverage ratio is increased to 40 percent (which is considered to be aggressive in light of the many smaller industrial properties that remain vacant), the County's build-out pace would be 2.5 million square feet per annum which is still well below historical and forecast trends noted above. Considering either one of the more realistic and applicable forecasts applies to the RER 2025 analysis, industrial land absorption is more likely to be between roughly 165 and 185 acres per year which means land depletion between 2030 and 2032,well below the 10-year availability horizon required by LU8-F.

At the broader level, this unquestionably has significant implications for Miami Dade County's industrial sector, which is vital to the region's economic growth and, critically, to the businesses such as Kelly Tractors which, as the following sections of this memorandum indicate, are significantly land constrained as it relates to their business model and growth.

Assessment of Localized Industrial Market Conditions

An important component to the needs analysis for Kelly Tractor new headquarters site is an in-depth evaluation of industrial land conditions and availability of land within the UDB which could support industrial development or lack thereof within the Tier and MSA (3.2) in which the property is located. The analysis starts with the County's own datasets including:

Land Use: Existing land use within Miami-Dade County (LUMA);

Future Land Use: Comprehensive Development Master Plan (CDMP) Land Use Plan map designations of Miami-Dade County;

TIERS and MSA: Boundaries for North Central Planning Tier (NCPT) and MSA 3.2; and,

Parcel Data: Property ownership boundaries as defined by legal descriptions and deeds throughout Miami-Dade County.

In accordance with the "Industrial and Office" designation within the CDMP Future Land Use Map, the NCPT includes a total 10,536 acres of industrial designated land (built and vacant). Based upon RER's LUMA aerial and development reviews and associated classifications, the County identifies properties (not necessarily by folio number) that the County considered "potentially vacant" including categories such as: fallow land, pasture, truck parking/junk yards, non-protected privately owned vacant land, and certain other agricultural uses, among others.

After excluding incompatible uses such as parks, protected lands, government-owned vacant land, cemeteries, and conservation areas, in April of 2026 RER indicated that there is **1,136 acres** of potentially vacant land inside the UDB that could support industrial development across the entire NCPT and summarized in the table below.

Summary of LUMA Land Use - Overlap with CDMP Industrial and Office Designation		
Description	**Acreage**	***% of Total***
Other Agriculture (Exotic Birds, Monkeys, Research Facilities)	232.3	*20.4%*
Fallow	6.2	*0.5%*
Pasture (Grazing, Animal Farming, Dairy Farms and Animal Feed Lots)	176.2	*15.5%*
Vacant, Non-Protected, Privately-Owned	685.0	*60.4%*
Junk Yard	35.8	*3.2%*
RER Indicated Potentially Vacant Lands Total	**1,135.5**	***100%***

Figure 12

Source: RER LUMA GIS Database; April 2026

It should be noted that the staff recommendation for denial indicates that 783 +/- acres of land appropriate for industrial exists in the North Central Planning Tier, most of which is in the MSA, 3.2 where the applicant's site is located. How RER identified 353 additional acres of available land for industrial development in the Tier during the past several months is not clear, but it appears from the County's most current database this is exactly what has occurred.

In any event, a closer examination of properties actually available for development within the UDB makes it very clear that there is dramatically less than 1,136 or even 783 acres available for industrial development inside the UDB.

When the acreage is broken down by MSA, the imbalance becomes quite apparent in that MSA 3.2 alone (and the area in which the applicant site is located) contains 89 percent of all RER designated vacant industrial land; or over 1,010 acres. No other MSA comprises more than 36 acres - shown in the following table.

Minor Statistical Area	CDMP Industrial Built & Vacant (Acres)	RER LUMA Identified Vacant (Acres)
1.3	21.1	3.7
3.2	**8,492.6**	**1,010.1**
4.1	233.5	6.9
4.2	719.0	27.8
4.3	365.8	1.1
4.4	0.00	0.0
4.5	274.7	21.7
4.6	121.2	35.7
4.7	247.0	28.3
5.1	61.3	0.00
Total:	**10,536.4**	**1,135.5**

Figure 13: Source - RER LUMA GIS Database; April 2026

However, within MSA 3.2, upon further evaluation, the apparent supply decreases significantly as a significant portion of the "vacant" land is not actually developable or is outside the UDB. Approximately 319 acres are already under development, and another 271 acres actually lie outside the UDB, making them unavailable for urban industrial use. This non-developable area combined represents 590 acres as follows and referenced in Exhibit 3 in the Appendix.

Under-developed/ Outside UDB	Land Use Description	Acreage
Under Development	Pasture (Grazing, Animal Farming, Dairy Farms and Animal Feed Lots)	176.2
	Vacant, Non-Protected, Privately-Owned	143.2
	Development Sub-total:	**319.5**
Outside UDB	Agriculture, Other (Exotic Birds, Monkeys, Research Facilities) *	232.4
	Vacant, Non-Protected, Privately-Owned	38.4
	Outside UDB Sub-total:	**270.8**
	Incompatible LUMA Total:	**590.3**

**Acreage associated with existing agricultural use of Kelly Tractor CDMP Property*

Figure 14

Once this combined 590 acres is removed, the remaining potentially developable vacant land drops to 420 acres (1,010 RER MSA 3.2 acres – 590 MSA 3.2 incompatible acres = 420 acres; see Exhibit 4 in Appendix).

However, it is important to note that 115 acres of the 420 comprises standalone and/or contiguous parcels that are less than 5 acres which is considered to be an absolute minimum parcel area to accommodate modern industrial space[6]. Therefore, there is actually **305 acres** of effective and usable vacant industrial land in MSA 3.2.

Based upon the County's own industrial land absorption estimate of 57 acres per annum on average for MSA 3.2 as set forth in the within the *RER 2025 analysis* noted in previous sections, there is only 5± years of industrial land available which does not even take into consideration that the County's absorption of industrial land Countywide is significantly understated based upon the most recent industry trends and projections.

[6] 5 acres minimum is being extraordinarily liberal. At 5 acres and 40% building coverage, a building of only 87,000 square feet can be built which is just over half of the average size industrial building being built in the County today.

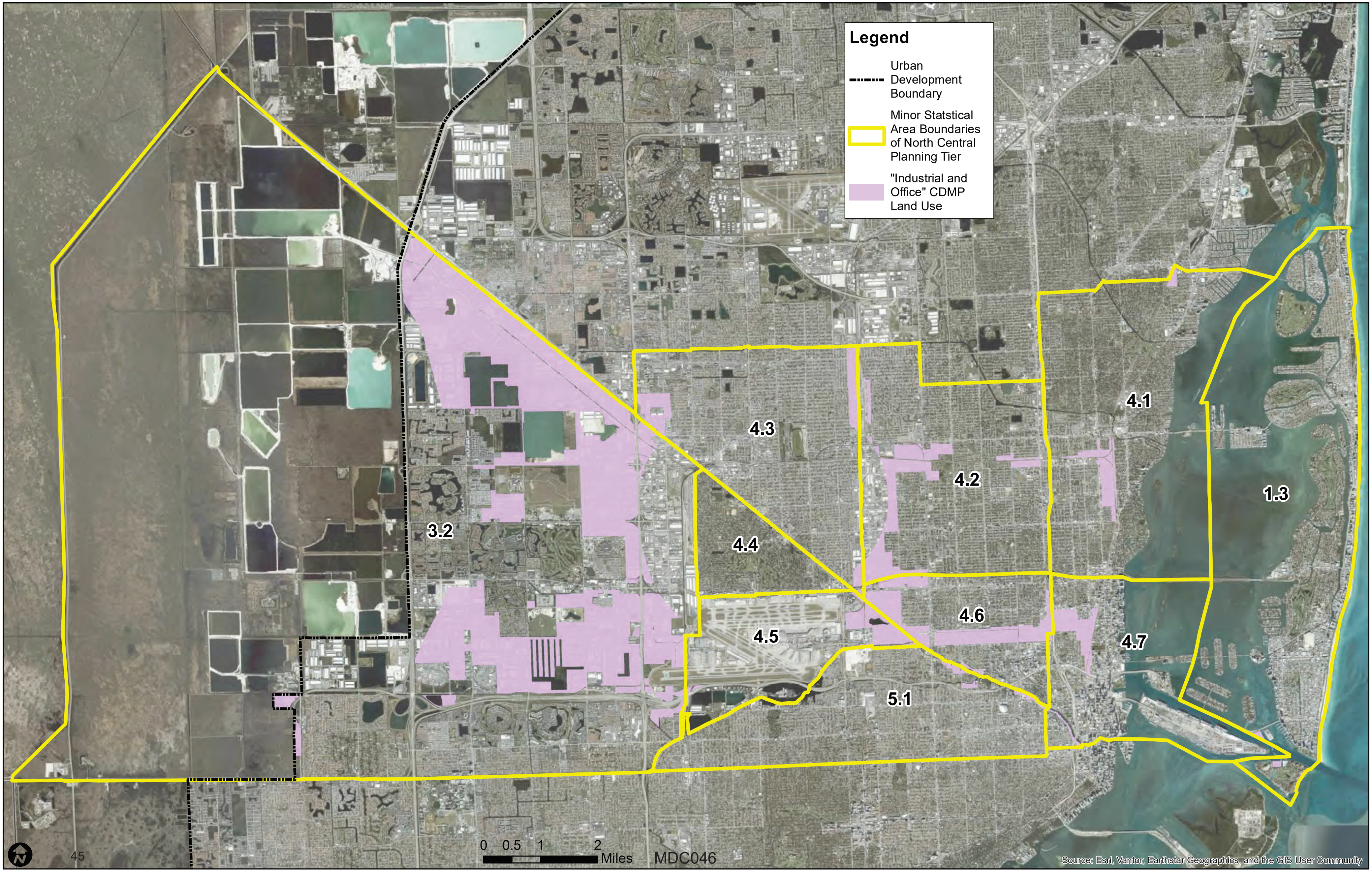

Exhibit 1: CDMP "Industrial and Office" within North Central Planning Tier

EAS Engineering, Inc.

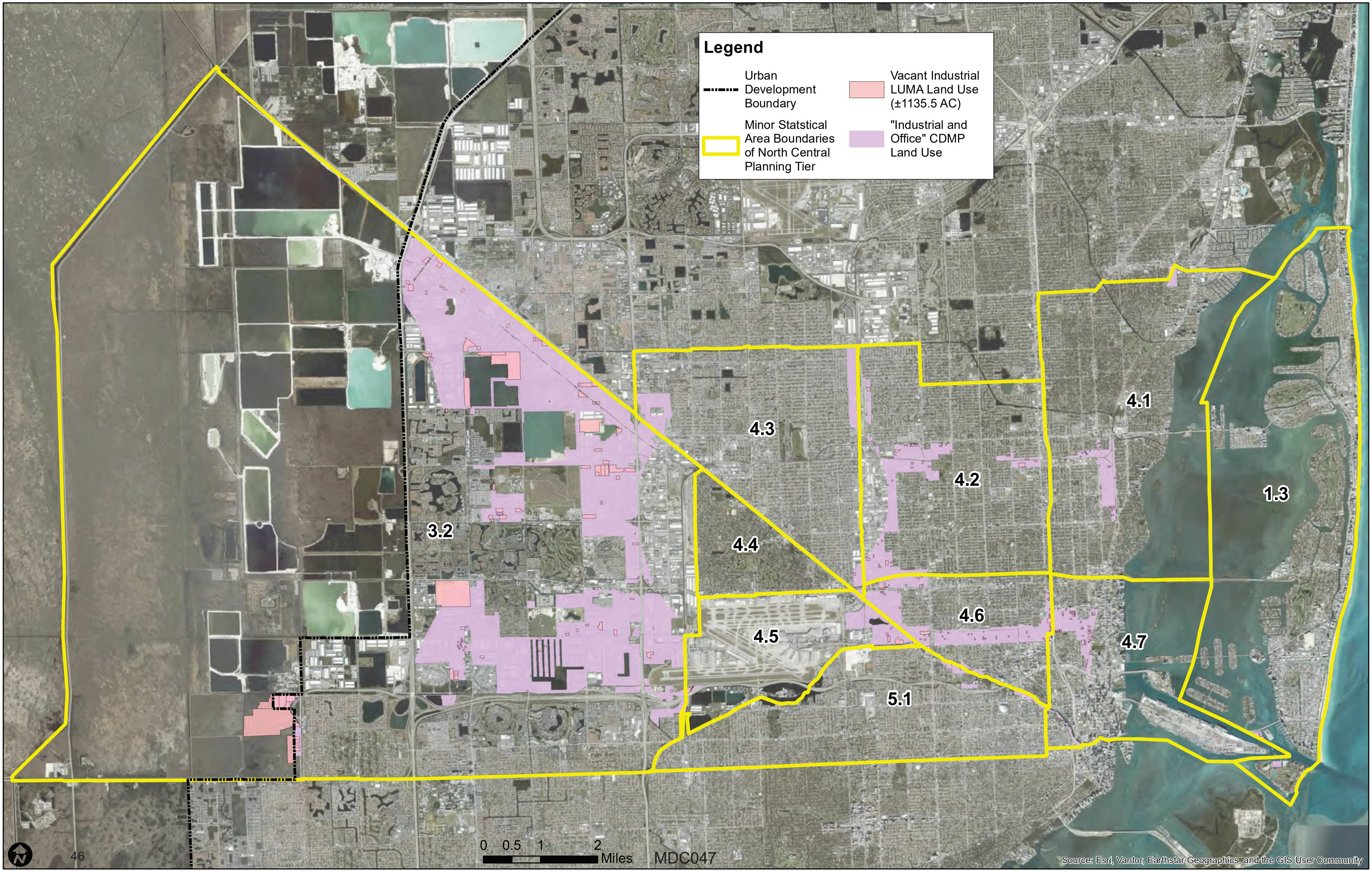

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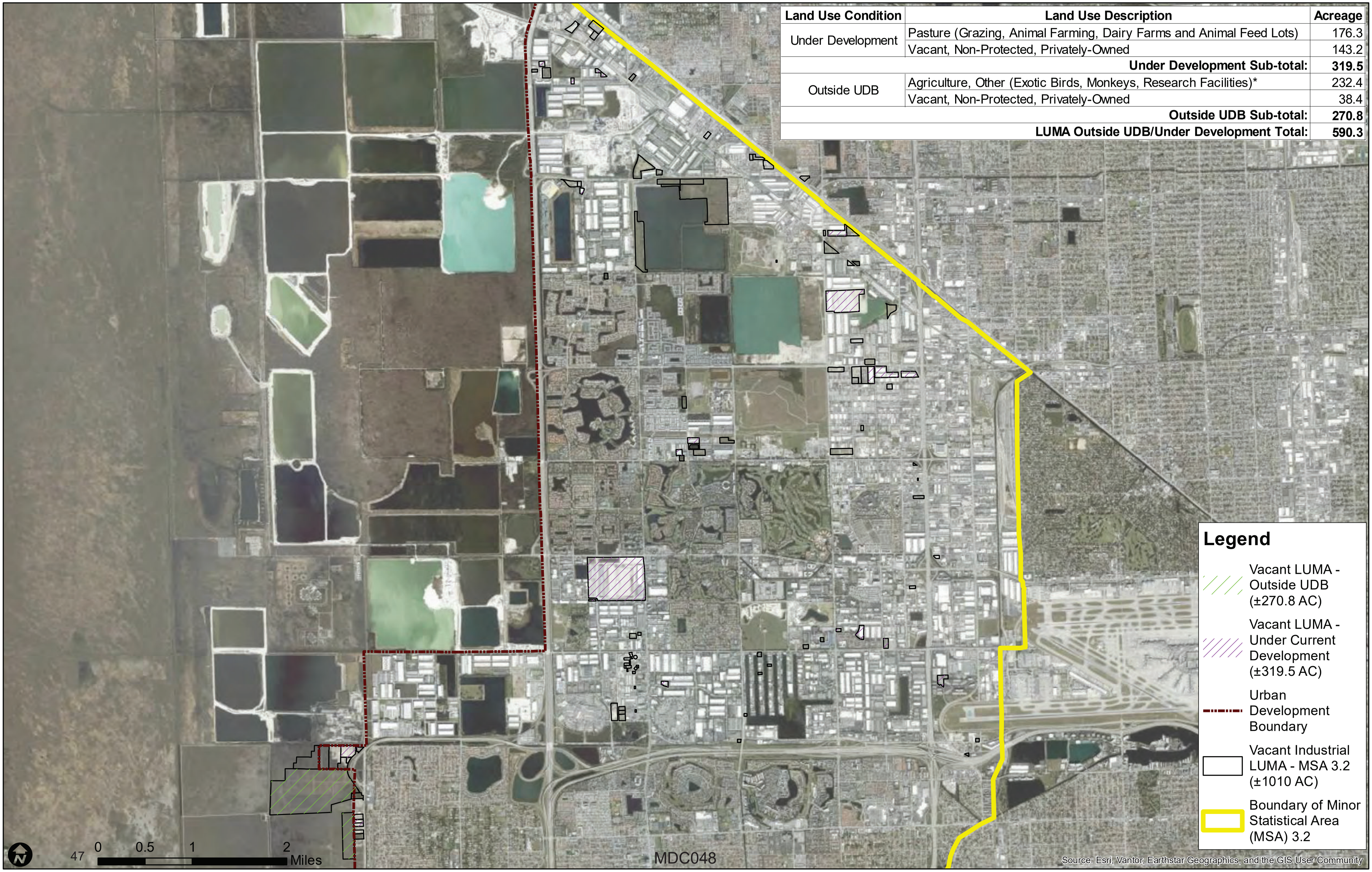
Exhibit 2: Vacant LUMA Land Use Overlay with CDMP "Industrial and Office" - North Central Planning Tier

EAS Engineering, Inc.



Land Use Condition	Land Use Description	Acreage
Under Development	Pasture (Grazing, Animal Farming, Dairy Farms and Animal Feed Lots)	176.3
	Vacant, Non-Protected, Privately-Owned	143.2
	Under Development Sub-total:	**319.5**
Outside UDB	Agriculture, Other (Exotic Birds, Monkeys, Research Facilities)*	232.4
	Vacant, Non-Protected, Privately-Owned	38.4
	Outside UDB Sub-total:	**270.8**
	LUMA Outside UDB/Under Development Total:	**590.3**

Exhibit 3: Vacant LUMA Outside UDB or Under Development - Minor Statistical Area 3.2

EAS Engineering, Inc.

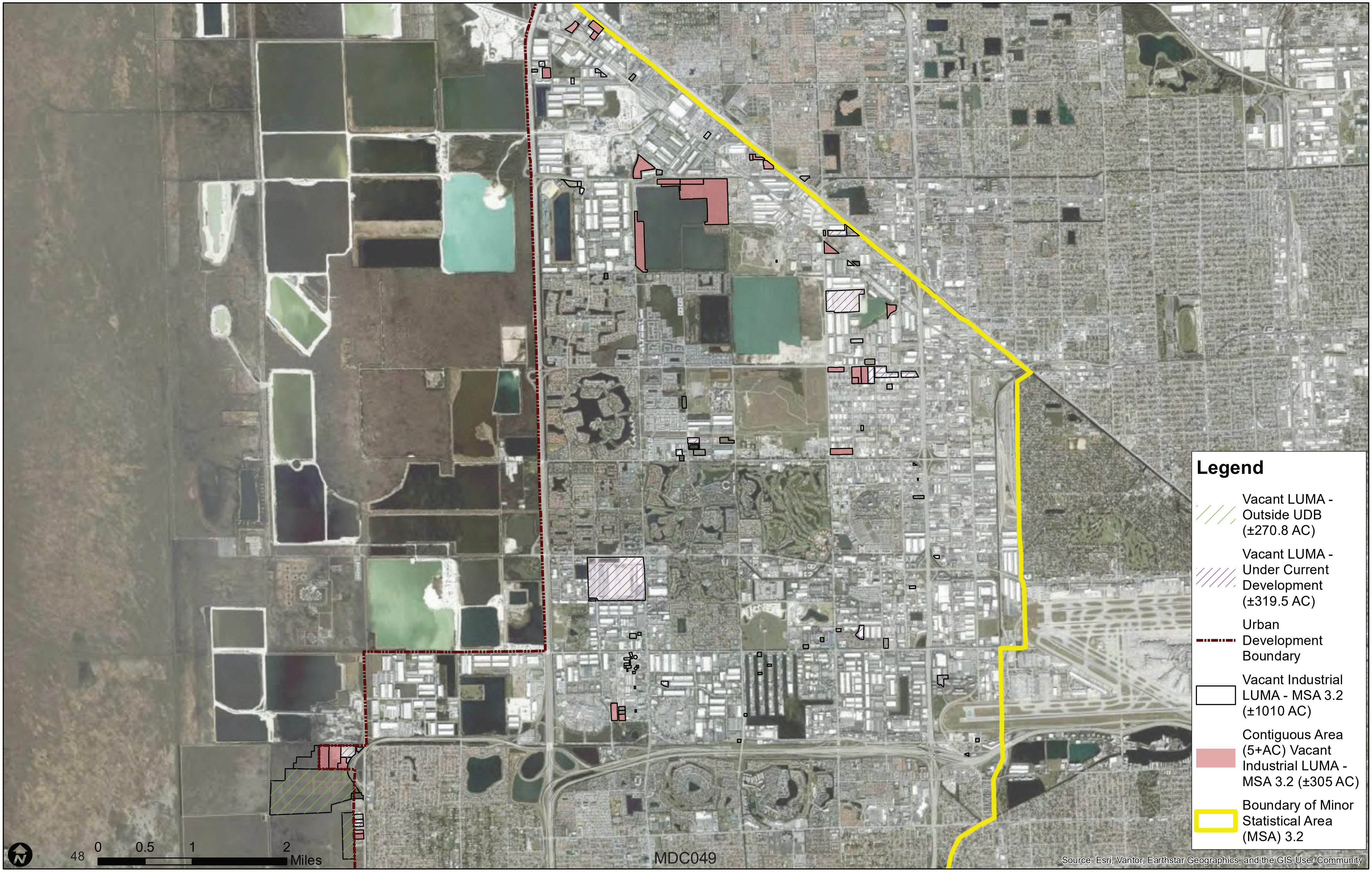


Exhibit 4: Contiguous Areas (5+acres) of Vacant Industrial LUMA - Minor Statistical Area 3.2

EAS Engineering, Inc.

Lambert

ADVISORY

RECEIVED 7/17/26
Planning Division

Kelly Tractor Company
CDMP20230013

This Instrument was Prepared by:

Name: Joseph G. Goldstein, Esq.
Address: Holland & Knight LLP
701 Brickell Avenue
Suite 3300
Miami, Florida 33131

(Space Reserved for Clerk of the Court)

DECLARATION OF RESTRICTIONS

(Comprehensive Development Master Plan)

WHEREAS, **MDXQ LLC**, a Florida limited liability company (the "Owner"), holds fee simple title to that certain approximately two hundred and forty six (+/-246) acres parcel of land, generally located west of NW 137 Avenue and Florida State Road 836, north of NW 6 Street and south of NW 9 Lane (as identified by Folio Nos. 30-3953-000-0130 and 30-3953-000-0138), in unincorporated Miami-Dade County, Florida, described in Exhibit "A" attached hereto and is hereinafter referred to as the "Property", which is supported by the opinion of title; and

WHEREAS, **KELLY TRACTOR COMPANY**, a Florida corporation (the "Applicant" or "Kelly") has applied for an amendment to the Miami-Dade County Comprehensive Development Master Plan (the "CDMP") with respect to the Property in the May 2023 amendment cycle as Application No. CDMP20230013 (the "Application"); and

WHEREAS, the Application includes this Declaration of Restrictions ("Declaration") that has been voluntarily proffered by the Owner; and

WHEREAS, the Application seeks text revisions to the CDMP Land Use Element to add the MIA Equipment and Supportive Services Area in the "Open Land" land use category, Open Land Subarea 3; and

WHEREAS, an approximately 3.129 +/- acre portion of the Property, which is located within the Urban Development Boundary and is legally described in Exhibit "B", will not be developed but may be utilized to meet open space requirements; and

NOW, THEREFORE, in order to assure Miami-Dade County, Florida (the "County") that the representations made by the Owner and the Applicant during the County's consideration of the Application will be abided by the Owner freely, voluntarily and without duress, makes the following Declaration covering and running with the Property:

1. **Development Intensity, Permitted Uses, and Restrictions.**

   A. The use of the Property shall be limited to the uses listed in the "Open Land" designation of the CDMP under the MIA Equipment and Supportive Services Area in Open Land Subarea 3, including accessory and ancillary uses that are consistent with the CDMP and with the wetlands and other preservation areas in and around the Property. Any such uses on the Property shall be limited to a maximum floor area ratio of 0.5 and the Owner shall apply to rezone the Property to provide for the MIA Equipment and Supportive Services Area uses to be reviewed through a zoning process, which may include a special or new zoning district, and which will include a conservation zoning district for the preservation areas as referenced herein, in accordance with the CDMP.

   B. Development within the MIA Equipment and Supportive Services Area will be developed in a manner that conforms with the following development criteria: (i) a minimum of 10% of the net lot area shall be developed as passive landscaped open space or active recreation space; and (ii) such open space, whether active or passive, includes exterior surface areas consisting of outdoor, at-grade space, including but not limited to greens, squares, plazas, courtyards, terraces, lawns, entrance features, and may consist of greenbelts, unpaved passive and active recreation areas, water retention areas, canals and other water bodies (except that such water bodies may satisfy no more than 20% of the open space requirement), paseos, pedestrian paths, bicycle paths and/or associated landscape areas, landscaping within road rights of way including medians, and above-grade landscaped roof terraces/gardens on buildings or garage structures. Prior to the issuance of a certificate of use for any building on the Property, the Owner shall designate, improve and thereafter maintain an outdoor recreational area for the benefit and enjoyment of its employees ("Recreational Area"), and such area may be counted towards satisfying the above referenced 10% minimum. The Recreational Area shall, at a minimum, be improved with benches, a covered area and landscaping. Shade trees shall be planted adjacent to sidewalks, walkways and walking paths throughout the Property.

C. No residential dwelling units shall be permitted on the Property except for one residential dwelling unit for purposes of maintenance and security of the Property.

D. Truck washing, equipment washing, fabrication, painting, maintenance and repair facilities that generate or will generate a liquid waste other than "domestic sewage," or use, generate, handle, dispose of, discharge or store "hazardous materials" as defined in Chapter 24, shall be under a roofed area and enclosed on at least two sides with approved secondary containment.

E. No outdoor maintenance of commercial vehicles (including construction equipment and agricultural equipment, as defined in section 320.01, Florida Statutes) or land uses that use, generate, handle, dispose of, discharge, or store hazardous materials or hazardous wastes shall be within 100-feet of a body of water, canal, or lake as measured from the top of bank, as defined in the Code.

F. No commercial vehicle storage shall be within 25 feet of a "wetland," as defined in Chapter 24.

G. Secondary containment systems as defined in the Code, shall be provided for any land use that uses, generates, handles, disposes of, discharges or stores hazardous materials, hazardous wastes or liquid waste in accordance with Chapter 24.

2. **Future Site Plan Review for Property.** The Property shall be developed over time in a manner that conforms with the uses set forth in the CDMP for the MIA Equipment and Supportive Services Area and the terms set forth herein. The Property is intended to be developed in manner similar to the conceptual site plan entitled, "Kelly Tractor Site" as prepared by Arcadis and dated March 9, 2026 ("Conceptual Plan"), as depicted in Exhibit "C". Except for the wetland preservation areas shown on the Conceptual Plan, the uses, square footages, proposed locations, and other components of the Conceptual Plan are for illustrative purposes only. Furthermore, the particular location or type of uses or activities shown on the final plans for the Property, and what is ultimately applied for by the Owner and approved through the regulatory process, may differ from the Conceptual Plan, except as to the wetland preservation areas. The fact that a use is shown on the Conceptual Plan, or particular location thereon, shall not be construed as an approval, and the Owner acknowledges that approvals under the Code or other applicable law may be required and could necessitate revisions to the site layout of the uses or other components. Prior to the issuance of a building permit for lake excavation permits relating to stormwater retention

areas or soil improvement permits for any of the uses listed in the "Open Land" designation of the CDMP under the MIA Equipment and Supportive Services Area in Open Land Subarea 3, the Owner shall submit and obtain site plan approval for the entire Property showing all phases of development through the Administrative Site Plan Review ("ASPR") process. Nothing in this paragraph shall preclude the issuance of other permits (other than a foundation permit), such as, but not limited to, fence permits to secure the perimeter of the Property, provided that the Owner has obtained the applicable County environmental permits.

3. **Concurrency and Phasing.**

A. Development of the Property shall meet concurrency and satisfy the requirements set forth in Chapter 33G of the Miami-Dade County Code ("Code").

B. It is expressly understood and agreed that the Property shall be connected to public water and public sanitary sewer as provided in paragraph 7 below.

C. It is also expressly understood that the Property may be developed in phases over an extended period of time. Any analysis, permitting, and mitigation shall be in accordance with the applicable laws governing at the time of application for permits or approvals.

D. In an effort to enhance non-motorized connectivity, the Owner shall provide bicycle racks at appropriate locations throughout the Property.

4. **Road Improvement(s).** The Owner shall provide access from NW 137 Avenue to the Property via NW 6 Street ("Road Improvement") as included in the CDMP Capital Improvements Element ("CIE") as part of this Application. Zoning application(s) for the Property, or any portion thereof, shall specifically address the completion of the Road

Improvement and changes to the CIE adopted as part of the Application. The CIE may be amended by the County from time to time in accordance with applicable laws and procedures in effect at the time. Such amendments may occur without the need for any amendment to this Declaration. The Road Improvement (in addition to other road improvements) shall be eligible for credit, to the extent allowed by Code, as a contribution-in-lieu of mobility impact fees, subject to the procedures set forth in Chapter 33E of the Code.

5. **Road Mitigation.** Prior to the issuance of the earlier of the first certificate of occupancy or the first temporary certificate of occupancy for any portion of the Property, the Owner agrees to have open to traffic or cause to have open to traffic NW/SW 139 Avenue from NW 6 Street to SW 8 Street and NW 6 Street from NW 137 Avenue to the Property. Those improvements to be constructed or caused to be constructed will be determined by Miami-Dade County and subject to permitting by the appropriate governmental agencies.

6. **Environmental Permits.** The Owner shall seek all applicable environmental permits within each phase (or portion thereof) pursuant to Chapter 24 of the Code. All subsequent development orders, including but not limited to site plans, tentative plats, final plats, building permits, zoning improvement permits, lake excavation permits and Class IV wetland permits, shall be subject to review and approval by the Department of Regulatory and Economic Resources ("RER") or successor agency, in accordance with applicable requirements in Chapter 24 and 11C of the Code, and for conformance with the CDMP. It is expressly agreed and acknowledged that (i) such environmental permits and approvals are not exhaustively listed herein; (ii) the Owner is required to obtain various environmental permits and approvals pursuant to Chapter 24 of the Code, as it may be

amended from time to time for their respective portion of the Property; (iii) RER has not yet reviewed or approved the required submittals for such environmental permits and approvals; (iv) this does not entitle the Owner to any such environmental permits and approvals or entitle the Owner to develop the Property unless and until such permits and approvals are obtained; (v) and additional environmental requirements may apply beyond those in effect of the date of the Declaration, including state or federal requirements and associated County requirements. The Owner acknowledges that the provisions of this Declaration do not constitute approval to use any particular property or portion thereof as mitigation in future environmental permitting or approvals.

A. **Stormwater Management.** Prior to the earliest approval by RER or successor agency of a soil improvement permit, building permit, Environmental Resource Permit for paving and drainage, lake excavation permit, final plat or tentative plat approval, environmental review or permit or zoning site plan, the Owner shall submit to RER and the RER-Planning Division for review and approval of a signed and sealed Final Stormwater Management Master Plan ("Final Stormwater Plan"). The Final Stormwater Plan shall be prepared by a licensed design professional and shall: (i) demonstrate how stormwater will be retained onsite to meet applicable regulatory retention requirements, including the North Trail Basin Fill Encroachment and Water Management Criteria, and other applicable requirements; (ii) describe the proposed stormwater management system, including its components and configuration, and demonstrate how stormwater within the Property will be managed to meet applicable regulatory requirements; (iii) include a representative assessment of potential soil and groundwater contamination, if any, relevant to stormwater management and site development; (iv) demonstrate the effect of the development on the drainage conditions on adjacent properties; (v) address whether the proposed development will have any impacts to existing stormwater features, such as canals and agricultural ditches; and (vi) demonstrate how the post-development conditions of the Property will be the same or better than the pre-development stormwater management, water quantity, and water quality levels of service conditions. The Final Stormwater Plan shall be prepared in accordance with the following versions in effect at the time the Final Stormwater Plan is submitted: Miami-Dade County Public Works Manual; the County Water Control Plan, Chapters 24 and 11C of the Code; the Florida Building Code; and ASCE 24. The Final Stormwater Plan shall demonstrate compliance with all applicable stormwater management requirements, including but not limited to drainage design criteria, flood protection standards, and the cut and fill encroachment criteria established in Chapter 24 of the Code of Miami-Dade County. In the event the proposed Dolphin Expressway/SR-836 Southwest Extension project is planned for implementation evidenced through its inclusion in the Miami-Dade County's Long Range Transportation Plan with its source of construction funding identified, as determined by the RER Director, the Owner shall modify the Final Stormwater Plan to demonstrate that all applicable stormwater management requirements will be met.

The County's acceptance of this Declaration shall not constitute approval of the stormwater management system or final drainage design.

B. **Wetlands, Endangered and Threatened Species.**

i. **<u>Wetland Permits</u>.** The Owner shall timely seek and obtain all appropriate permits and approvals prior to any dredging, filling, and development of any wetlands located within the Property. Fill used on the Property shall only consist of clean fill as defined by Section 24-5 of the Code of Miami-Dade County.

ii. **<u>Wetland Mitigation</u>.** Any wetland mitigation for any portion of the Property, shall be done via (1) on-site mitigation or (2) permittee responsible mitigation within Miami-Dade County (which may include permittee responsible mitigation within County properties to the extent permissible), except to the extent that there are wetland mitigation bank credits available at banks in Miami-Dade County and mitigation is done via such credits from within Miami-Dade County.

iii. **<u>Threatened and Endangered Species</u>.** Prior to the approval of any development permits or orders, including but not limited to: site plan approvals, zoning actions, tentative plats, building permits, zoning improvement permits, lake excavation permits, and Class IV wetlands permits, for development of any portions of the Property, the Owner shall conduct a survey to determine the absence or presence within the Property or phase of development subject to the request for approval of said development permit or order of (i) listed plant species found in Appendix A of the CDMP's Conservation, Drainage and Aquifer Recharge Element and (ii) listed wildlife species found in Appendix B of the CDMP. The survey(s) shall utilize professionally recognized survey timeframes and sampling methodology and shall be subject to review and approval by RER or successor agency prior to implementation. The Owner shall prepare or revise site plans, tentative plat applications, building permit plans, zoning improvement permits, lake excavation permits and Class IV wetlands permit plans, subject to RER review and approval, as necessary to comply with requirements of Chapter 24 of the Code of Miami-Dade County and for conformance with the provisions of the CDMP, Class IV permit approval, and approved Final Stormwater Plan, and any other environmental permits or approvals issued pursuant to Chapter 24 of the Code.

iv. **Preservation Areas on Property.**

1. A minimum of 63.11 acres of land shall be preserved as depicted as a Preservation Area in Exhibit "D". To the extent the Preservation Area includes any areas proposed or required to be dedicated as public right-of-way, or includes any other right-of-way for any roadway or expressway, such right-of-way may not count towards the minimum 63.11 acres. To the extent that the area within Exhibit "D" is not sufficient to preserve the minimum 63.11 acres of land due to roadway or expressway right-of-way, the Owner shall add additional preservation area on the Property to be shown at the time of plat or through other recordable instrument in the favor of Miami-Dade County, except to the extent the Director determines that due to a roadway overpass/flyover that certain additional preservation areas is

not required. In addition, if additional preservation areas are required due to expressway right-of-way and the Director determines that such additional preservation area cannot be accommodated elsewhere on the Property, then such additional preservation area may be located within the North Trail Basin, subject to review and approval of the Director, where a restrictive covenant in favor of Miami-Dade County shall guarantee the preservation and maintenance of such area by the Owner. The Owner shall apply to rezone Preservation Area to a conservation district designed for the environmental protection or preservation of the Preservation Area. Any future district boundary change application or approval for the Property shall expressly exclude the Preservation Area from the rezoning, unless the application seeks a zoning district designation for the Preservation Area that is exclusively for environmental protection or preservation.

2. The Owner shall be responsible for maintaining the Preservation Area in perpetuity and in a natural state free of exotic vegetation pursuant to a maintenance plan that shall be provided prior to or simultaneously with the issuance of a Class IV permit or cut and fill approval (whichever comes first). The maintenance plan may be modified in writing by RER or its successor department.

3. The restriction in this section entitled Preservation Areas on Property shall be deemed to be a conservation easement pursuant to Section 704.06, F.S.

4. The Preservation Area will be crossed by NW 142 Avenue, as depicted in Exhibit "D", and Owner shall provide wetland connectivity and wildlife underpasses by constructing said roadway generally in accordance with the cross section in Exhibit "E".
5. The Preservation Area shall be depicted as a separate parcel of land on applicable tentative plat plans for the Property.
6. The Preservation Area shall be depicted on all applicable final plats, Class IV permit plans, paving and drainage plans, soil improvement permit plans, and building permit plans.
7. If the Owner wishes to convey the Preservation Area to the County, the Owner shall convey the Preservation Area at no cost to the County and provide a funding mechanism that fully funds the long-term maintenance of the Preservation Area.

v. **<u>Offsite Wetland Preservation Areas</u>.** The Owner commits to providing at least an additional ±20 acres of offsite wetland preservation areas for conveyance to the Environmentally Endangered Lands ("EEL") Program that shall not be used to offset any development obligations or permit requirements. This includes but is not limited to any stormwater management approvals, drainage approvals, Class permit approvals, or cut and fill criteria. First priority shall be given to properties located within the North Trail Basin. If no suitable land is available, as determined by Miami-Dade County, within the North Trail Basin, second priority shall be given to properties located within the Bird Drive Basin and third priority shall be for lands identified on the acquisition list of the EEL program. The Owner agrees that prior to or simultaneously with the earliest of rezoning, approval of any plat or tentative plat, or the issuance of a Class IV permit for the land clearing of the Property, or any portion thereof, the Owner shall dedicate and convey these additional offsite wetland preservation areas to Miami-Dade County EEL program, at no cost to Miami-Dade County and in a natural state free of exotic vegetation. The Owner agrees to provide a funding mechanism that fully funds the maintenance of the offsite wetland preservation areas in perpetuity and any other obligations of such offsite wetlands preservation area. Should the County in its discretion elect not to accept such dedication, then the Owner shall record a restrictive covenant over the offsite preservation area in favor of the County, which shall require the preservation and maintenance of the offsite preservation area by the Owner of the Property.

7. **Connection to Public Water and Sanitary Sewer Service.** The Owner hereby acknowledges and agrees that any development of the Property shall connect to the public water and public sanitary sewer system at the Owner's expense, and such infrastructure shall be designed and installed in accordance with the requirements of Chapter 24 of the Code of Miami Dade County and Water and Sewer Department ("WASD") rules and regulations and design standards. The right to connect the Property to the County's sewage 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 in the United States of America, the State of Florida and State of Florida Department of Environmental Protection v. Miami-Dade County, Case No. 1:12-cv-24400-FAM (S.D. Fla) (the "Consent Decree), as well as all other current, subsequent, or future enforcement, and regulatory actions and proceedings. Moreover, if a public pump station is required at the time the Water and Sewer Agreement is requested for the Property, the Owner will install a public sanitary sewer pump station at the Owner's expense to provide service to the proposed development, subject to any applicable RER or successor agency and WASD approvals.

8. **Archaeological Site/Potential Unmarked Human Burial.** The Phase One Archeological Assessment submitted as part of the County's review of the Application has confirmed the existence of archaeological Site 8DA93 in the southeastern corner of the Property (the "Archaeological Site"), as such designated by Miami-Dade County. The Owner has an interest in protecting and preserving the unmarked burials, human skeletal remains and associated burial artifacts within the Archaeological Site. As such, the Owner covenants that it shall preserve and make no physical alteration to the Archaeological Site. The Archaeological Site is legally described and depicted in Exhibit "F". It is acknowledged that the Archaeological Site consists of approximately 18.61 acres of the overall 63.11-acre Preservation Area.

9. **Notice of Intent to Sell.** Prior to listing the property that is the current Kelly Tractor Company headquarters comprising ±41.25 acres plus a vacant adjacent ±9.43-acre parcel owned by Kelly Tractor Company located at the following primary address: 8255 NW 58

Street, Miami, FL 33166 (Folios 30-3015-001-0360, -0370, -0380, -0410), or any portion thereof, for sale, Applicant, including its successors and assigns, agrees to provide the County with 120 days written notice of its intent to list the property for sale. Further, upon listing the property for sale, Applicant, including its successors and assigns, agrees to provide the County with a copy of the listing. Such notice and listing shall be provided by certified mail to the Mayor of Miami Dade County at the following address: 111 NW 1st Street, 29th Floor, Miami, FL 33128, with a copy of said notice provided to the Director of the Department of Regulatory and Economic Resources at the following address: 111 NW 1st Street, 11th Floor, Miami, FL 33128.

10. **County Emergency Management.** Owner recognizes that, given the Property's unique size and location, access to the Property may offer certain benefits to the County's efforts to respond to emergencies, including, for example, fires and hurricanes. Accordingly, Owner agrees to allow the County to access the Property to assist with County emergency management and response efforts during any federal, state, or local declared state of emergency affecting Miami-Dade County. Owner shall provide such access within 48 hours of such declared state of emergency, upon written notice from the County requesting such access. Such access shall be limited to portions of the Property that have been paved in compliance with all applicable permits. Nothing in this paragraph, however, is intended to interfere with the Owner's operations on, or use of, the Property. Owner agrees to cooperate with the County and provide such access and also to coordinate in good faith with respect to other requests related to the Property during such emergencies, until the expiration of the applicable state of emergency, unless the County notifies Owner that such access is no longer needed prior to such expiration.

11. **Community Education and Training Program.** Owner agrees to create and/or participate in an education and training program available to post-secondary and/or high school students in Miami-Dade County, which may include, but shall not be limited to neurodivergent individuals, where such program would provide training relating to vocational skills and/or job- and career-related opportunities at Kelly Tractor or in the equipment/manufacturing field more generally. Owner shall coordinate with Miami-Dade County Public Schools in regards to creating and/or participating in, and implementing, such a program; provided, however, that if Miami-Dade County Public Schools does not wish to coordinate with Owner in regards to creating, participating in, or implementing such program, Owner shall still be obligated to provide education and training opportunities to local students on its own accord or in partnership with other entities. To demonstrate compliance with this requirement, Owner shall furnish a written report related to the education and training program to the County prior to approval of the earliest of rezoning, plat, or tentative plat for the Property, or any portion thereof, or within 3 years of approval of the Application, whichever occurs first, including details about the program and the approximate number of students served or to be served.

MISCELLANEOUS

Covenant Running with the Land. This Declaration on the part of the Owner shall constitute a covenant running with the land and may be recorded, at Owner's expense, in the public records of Miami-Dade County, Florida and shall remain in full force and effect and be binding upon the undersigned Owner, and its heirs, successors and assigns until such time as the same is modified or released. These restrictions during their lifetime shall be for the benefit of, and limitation upon, all present and future owners of the real property and for the benefit of Miami-Dade County and the public welfare. The Owner, and its heirs, successors and assigns, acknowledge that acceptance of this Declaration does not in any way obligate or provide a limitation on the County.

Term. This Declaration is to run with the land and shall be binding on all parties and all persons claiming under it for a period of thirty (30) years from the date this Declaration is recorded after which time it shall be extended automatically for successive periods of ten (10) years each, unless an instrument signed by the, then, owner(s) of the Property has been recorded agreeing to change the covenant in whole, or in part, provided that the Declaration has first been modified or released by Miami-Dade County.

Modification, Amendment, Release. This Declaration of Restrictions may be modified, amended or released as to the Property, or any portion thereof, by a written instrument executed by the then owner(s) of the property, including joinders of all mortgagees, provided that the same is also approved by the Board of County Commissioners of Miami-Dade County, Florida. Any such modification, amendment or release shall be subject to the provisions governing amendments to Comprehensive Plans, as set forth in Chapter 163, Part II, Florida Statutes or successor legislation that may, from time to time, govern amendments to Comprehensive Plans (hereinafter "Chapter 163"). Such modification, amendment or release shall also be subject to the provisions governing amendments to the CDMP as set forth in Section 2-116.1 of the Code of Miami-Dade County, or successor regulations governing modifications to the CDMP. In the event that the property is incorporated within a new municipality or annexed into an existing municipality, and the successor municipality amends, modifies, or declines to adopt the provisions of Section 2-116.1 of the Miami-Dade County Code, then modifications, amendments or releases of this

Declaration shall be subject to Chapter 163 and the provisions of such ordinances as may be adopted by such successor municipality for the adoption of amendments to its comprehensive plan; or, in the event that the successor municipality does not adopt such ordinances, subject to Chapter 163 and by the provisions for the adoption of zoning district boundary changes. It is provided, however, that in the event that the successor municipality approves a modification or deletion of this Declaration of Restrictions, such modification or deletion shall not be effective until approved by the Board of County Commissioners, in accordance with applicable procedures. Should this Declaration be so modified, amended, or released, the Director of the Department of Regulatory and Economic Resources or the executive officer of a successor department, or, in the absence of such Director or executive officer, by his or her assistant in charge of the office in his/her absence, shall execute a written instrument effectuating and acknowledging such modification, amendment, or release.

Enforcement. Enforcement shall be by action against any parties or person violating, or attempting to violate, any covenants. The prevailing party in any action or suit pertaining to or arising out of this declaration shall be entitled to recover, in addition to costs and disbursements allowed by law, such sum as the Court may adjudge to be reasonable for the services of his attorney. This enforcement provision shall be in addition to any other remedies available at law, in equity or both.

County Inspections. As further part of this Declaration, it is hereby understood and agreed that any official inspector of Miami-Dade County, or its agents duly authorized, may have the privilege at any time during normal working hours of entering and inspecting the use of the premises to determine whether or not the requirements of the building and zoning regulations and the conditions herein agreed to are being complied with.

<u>Authorization for Miami-Dade County (or successor municipality) to Withhold Permits and Inspections</u>. In the event the terms of this Declaration are not being complied with, in addition to any other remedies available, the County (or successor municipality) is hereby authorized to withhold any further permits, and refuse to make any inspections or grant any approvals, until such time as this declaration is complied with.

<u>Election of Remedies</u>. All rights, remedies and privileges granted herein shall be deemed to be cumulative and the exercise of any one or more shall neither be deemed to constitute an election of remedies, nor shall it preclude the party exercising the same from exercising such other additional rights, remedies or privileges.

<u>Presumption of Compliance</u>. Where construction has occurred on the Property or any portion thereof, pursuant to a lawful permit issued by the County (or successor municipality), and inspections made and approval of occupancy given by the County (or successor municipality), then such construction, inspection and approval shall create a rebuttable presumption that the buildings or structures thus constructed comply with the intent and spirit of this Declaration.

<u>Severability</u>. Invalidation of any one of these covenants, by judgment of Court, shall not affect any of the other provisions which shall remain in full force and effect. However, if any material portion is invalidated, the County shall be entitled to revoke any approval predicated upon the invalidated portion.

<u>Recordation and Effective Date</u>. This Declaration shall be filed of record in the public records of Miami-Dade County, Florida at the cost of the Owner following the approval of the Application by the Board of County Commissioners. This Declaration shall become effective immediately upon recordation. Notwithstanding the previous sentence, if any appeal is filed, and the disposition of such appeal results in the denial of the Application, in its entirety, then this Declaration shall be null and void and of no further effect. Upon the disposition of an appeal that results in the denial of the Application, in its entirety, and upon written request, the Director of the Department of Regulatory and Economic Resources or the executive officer of the successor of said department, or in the absence of such director or executive officer by his/her assistant in charge of the office in his/her absence, shall forthwith execute a written instrument, in recordable form, acknowledging that this Declaration is null and void and of no further effect.

Acceptance of Declaration. The Owner acknowledges that acceptance of this Declaration does not obligate the County in any manner, nor does it entitle the Owner to a favorable recommendation or approval of any application, zoning or otherwise, and the Board of County Commissioners retains its full power and authority to deny each such application in whole or in part and decline to accept any conveyance.

Owner. The term Owner shall include all heirs, assigns, and successors in interest.

[Signature Page to Follow]

IN WITNESS WHEREOF, we have executed this Declaration of Restrictions as of this ___ day of ___________, 2026.

WITNESSES:

____
Signature
____
Printed Name

Address: ____________________________
____

____
Signature
____
Printed Name

Address: ____________________________
____

MDXQ LLC, a Florida limited liability Corporation

By:_______________________________
Name: Christopher L. Kelly
Title: President
Address: ___________________________
____

STATE OF FLORIDA)
) SS
COUNTY OF MIAMI-DADE)

The foregoing instrument was acknowledged before me by Christopher L. Kelly, as President of MDXQ LLC, a Florida limited liability company, and for the purposes stated herein on behalf of said limited liability company. He is personally known to me or has produced ________________________________ as identification.

Witness my signature and official seal this ______ day of _________________, 2026, in the County and State aforesaid.

____
Notary Signature
____
Print Name
____
Commission Number

My Commission Expires:___________

EXHIBIT "A"

LEGAL DESCRIPTION AND SKETCH FOR THE PROPERTY

A portion of Government Lot 3 lying between Township 53 South and 54 South, Range 39 East, Miami–Dade County, Florida, being more particularly described as follows:

Begin at the Southwest corner of said Government Lot 3; thence North 01°35'33" East along the West line of said Government Lot 3 for 2592.55 feet; thence South 89°19'56" East along a line parallel to and 1320.00 feet South of, as measured at right angles to, the North line of said Government Lot 3, for 5168.67 feet; thence South 00°51'03" West along a line parallel to and 140.00 feet West of, as measured at right angles to, the East line of said Government Lot 3 for 1320.01 feet; thence North 89°19'56" West along a line parallel to and 2640.00 feet South of, as measured at right angles to, the North line of said Government Lot 3 for 660.25 feet; thence South 00°51'03" West along a line parallel with said East line of Government Lot 3 for 326.97 feet to a point being 698.96 feet North of, as measured at right angles to, the South line of said Government Lot 3; thence South 73°44'48" West for 1169.68 feet; thence South 00°51'03" West along a line, parallel to said East line of Government Lot 3 for 420.00 feet to a point on the South line of said Government Lot 3, said point being 1921.32 feet West of the Southeast corner of said Government Lot 3; thence South 87°34'44" West along the South line of said Government Lot 3 for 3429.60 feet to the Point of Beginning.

LESS AND EXCEPT THE FOLLOWING PROPERTY:

Commence at the Northeast corner of Excess Government Lot 3 lying between Township 53 South and Township 54 South, Range 39 East in Miami–Dade County, Florida, this also being the Southeast corner of Section 34, Township 53 South, Range 39 East; thence North 89°09'49" West along the North line of said Excess Government Lot 3 for 140.00 feet; thence departing said North line of Excess Government Lot 3, South 01°00'39" West along a line 140.00 feet Westerly of, as measured at right angles to and parallel with the East line of said Excess Government Lot 3 for 1320.00 feet to the Point of Beginning of the hereinafter described parcel of land; from said Point of Beginning, thence continue South 01°00'39" West along said parallel line for 1320.01 feet; thence departing said parallel line, North 89°09'49" West for 108.60 feet to a Point of Non–Tangent Intersection with the arc of a circular curve concave to the Southwest, and with said Point of Non–Tangent Intersection bearing North 76°47'17" East from the center of said curve; thence Northwesterly along the arc of said curve, having a radius of 608.00 feet and a central angle of 23°36'54" for 250.59 feet to the Point of Non–Tangent Intersection with a line bearing North 36°49'37" West, with said Point of Non–Tangent Intersection bearing North 53°10'23" East from the center of said curve; thence North 36°49'37" West along said intersecting line for 760.42 feet to a Point of Non–Tangent Intersection with the arc of a circular curve concave to the Northeast, with said Point of Non–Tangent Intersection bearing South 53°10'23" West from the center of said curve; thence Northwesterly along the arc of said curve, having a radius of 860.00 feet and a central angle of 35°34'27" for 533.96 feet to a Point of Non–Tangent Intersection with a line lying 1320.00 feet Southerly of, as measured at right angles to and parallel with said North line of Excess Government Lot 3, with said Point of Non–Tangent Intersection bearing South 88°44'49" West from the center of said curve; thence South 89°09'49" East along said parallel line for 864.40 feet to the Point of Beginning.

SURVEYOR'S NOTES:

– This site lies in Government Lot 3, between Township 53 & 54 South, Range 39 East, Miami–Dade County Florida.

– All documents are recorded in the Public Records of Miami–Dade County, Florida unless otherwise noted.

– Bearings hereon are referred to an assumed value of N 89°09'43" W for the North line of Government Lot 3.

– Lands shown hereon were not abstracted for easements and/or rights–of–way of records.

– Lands shown hereon containing 10,718,972 square feet, or 246.074 acres, more or less.

– This is not a "Boundary Survey" but only a graphic depiction of the description shown hereon.

– Dimensions shown hereon are based on Fortin, Leavy, Skiles, sketch #2004–224–1.

SURVEYOR'S CERTIFICATION:

I hereby certify that this "Sketch of Description" was made under my responsible charge on June 6, 2022, and meets the applicable codes as set forth in the Florida Administrative Code, pursuant to Section 472.027, Florida Statutes.

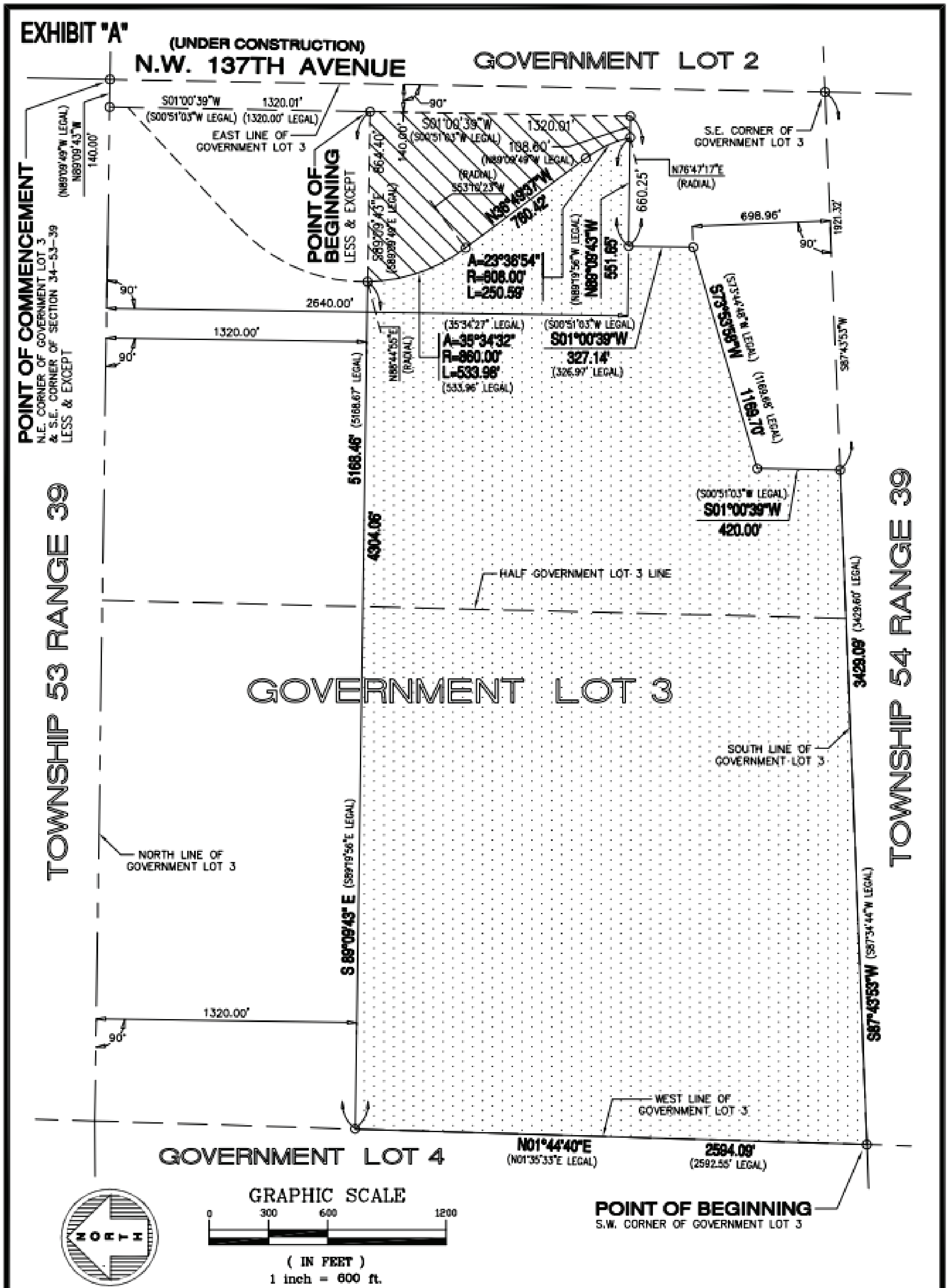
"Not valid without the signature and original raised seal or a digital signature of the Florida Licensed Surveyor and Mapper shown below"

FORTIN, LEAVY, SKILES, INC., LB3653

Digitally signed by Daniel C Fortin
DN: c=US, o=Florida, dnQualifier=A01410D000001867E531E56000A6E7A, cn=Daniel C Fortin
Date: 2025.06.09 07:57:43 -04'00'

By: ______________________________
Daniel C. Fortin Jr., For The Firm
Surveyor and Mapper, LS6435
State of Florida.

Drawn By	MAP	LEGAL DESCRIPTION, NOTES & CERTIFICATION	Date	6/6/25
Cad. No.	250360	**FORTIN, LEAVY, SKILES, INC.**	Scale	NOT TO SCALE
Ref. Dwg.	2004–224–1	CONSULTING ENGINEERS, SURVEYORS & MAPPERS	Job. No.	250360
		FLORIDA CERTIFICATE OF AUTHORIZATION NUMBER: 00003653 180 Northeast 168th. Street / North Miami Beach, Florida. 33162	Dwg. No.	1025–041–1
Plotted:	6/6/25 11:26a	Phone: 305-653-4493 / Fax 305-651-7152 / Email fls@flssurvey.com	Sheet	1 of 3



Drawn By MAP	**SKETCH OF DESCRIPTION**	Date 6/6/25
Cad. No. 250360	FORTIN, LEAVY, SKILES, INC.	Scale 1"=600'
Ref. Dwg. 2004-224-1	CONSULTING ENGINEERS, SURVEYORS & MAPPERS	Job. No. 250360
	FLORIDA CERTIFICATE OF AUTHORIZATION NUMBER: 00003653 180 Northeast 168th. Street / North Miami Beach, Florida. 33162	Dwg. No. 1025-041-1
Plotted: 6/6/25 11:26a	Phone: 305-653-4493 / Fax 305-651-7152 / Email fls@flssurvey.com	Sheet 2 of 3

EXHIBIT "B"

LEGAL DESCRIPTION AND SKETCH FOR PORTION OF PROPERTY WITHIN THE UDB

LEGAL DESCRIPTION:

A portion of Government Lot 3 lying between Township 53 South and 54 South, Range 39 East, Miami–Dade County, Florida, being more particularly described as follows:

Commence at the Northeast corner of said Government Lot 3; thence N 89°09'43" W along the North line of said Government Lot 3 for 140.00 feet; thence S 01°00'39" W along a line 140.00 feet Westerly of, as measured at right angles, and parallel with the East line of said Government Lot 3 for 1320.01 feet, the following two (2) courses being along a line 2640.00 feet Southerly of, as measured at right angles, and parallel with said North line of Government Lot 3; 1) thence N 89°09'43" W for 108.60 feet to the Point of Beginning of the hereinafter described parcel of land; 2) thence continue N 89°09'43" W for 407.67 feet; thence N 01°45'41" E along the Urban Development Boundary Line for 599.03 feet; thence S 36°49'37" E for 473.78 feet to a point of curvature; thence Southeasterly along a 608.00 foot radius curve leading to the right through a central angle of 23°36'54 for an arc distance of 250.59 feet to the Point of Beginning.

SURVEYOR'S NOTES:

- This site lies in Government Lot 3, between Township 53 & 54 South, Range 39 East, Miami–Dade County Florida.
- All documents are recorded in the Public Records of Miami–Dade County, Florida unless otherwise noted.
- Bearings hereon are referred to an assumed value of N 89°09'43" W for the North line of Government Lot 3.
- Lands shown hereon were not abstracted for easements and/or rights–of–way of records.
- Lands shown hereon containing 136,287 square feet, or 3.129 acres, more or less.
- This is not a "Boundary Survey" but only a graphic depiction of the description shown hereon.
- Dimensions shown hereon are based on Fortin, Leavy, Skiles, sketch #2004–224–1.

SURVEYOR'S CERTIFICATION:

I hereby certify that this "Sketch of Description" was made under my responsible charge on June 6, 2022, and meets the applicable codes as set forth in the Florida Administrative Code, pursuant to Section 472.027, Florida Statutes.

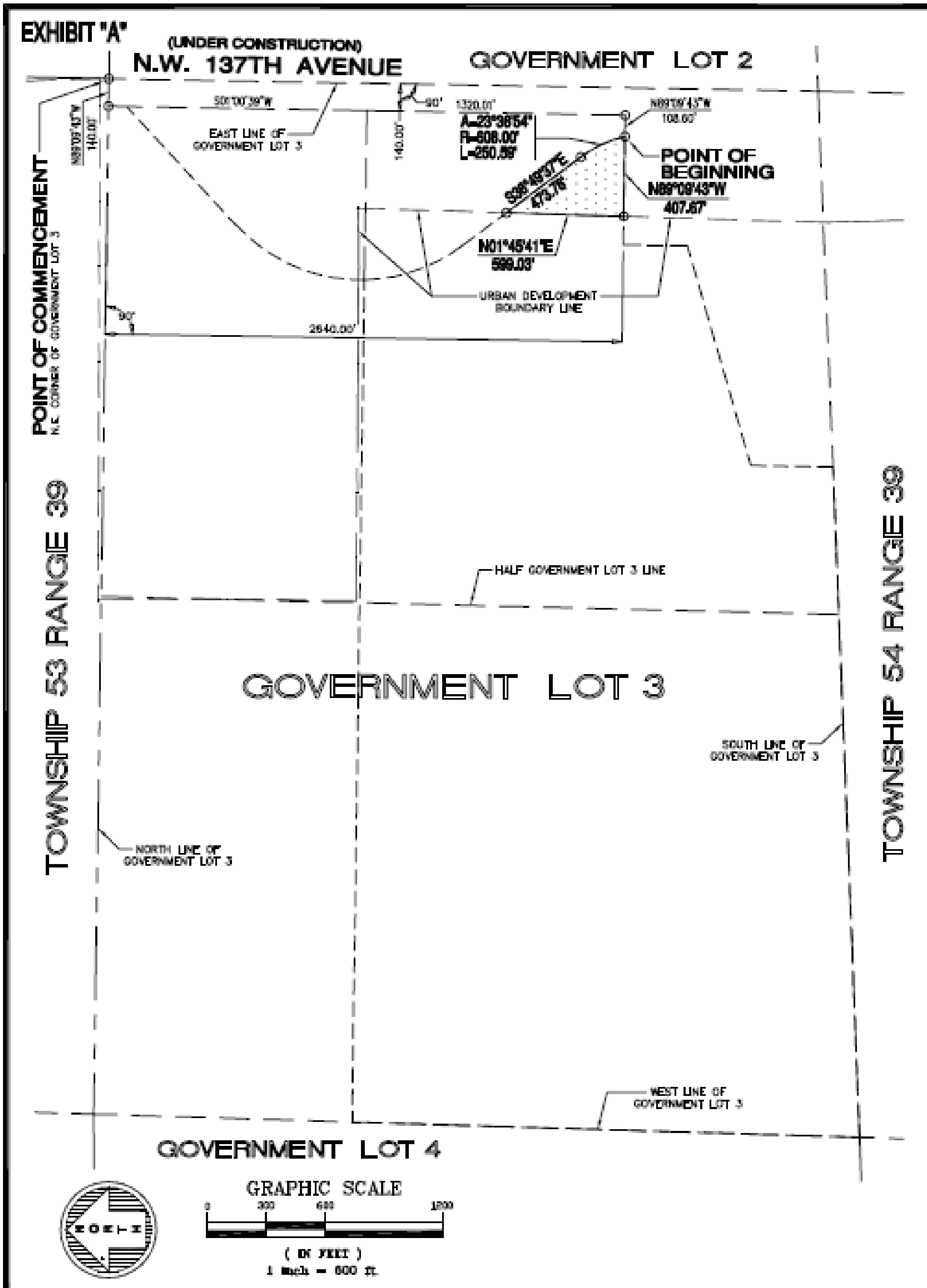
"Not valid without the signature and original raised seal or a digital signature of the Florida Licensed Surveyor and Mapper shown below"

FORTIN, LEAVY, SKILES, INC., LB3653

By: Daniel C. Fortin Jr., For The Firm
Surveyor and Mapper, LS6435
State of Florida.

Digitally signed by Daniel C Fortin
DN: c=US, o=Florida, dnQualifier=A01410D000001867E531E56000A6E7A, cn=Daniel C Fortin
Date: 2025.06.09 07:58:46 -04'00'

Drawn By	MAP	LEGAL DESCRIPTION, NOTES & CERTIFICATION	Date	6/6/25
Cad. No.	250360	FORTIN, LEAVY, SKILES, INC. CONSULTING ENGINEERS, SURVEYORS & MAPPERS	Scale	NOT TO SCALE
Ref. Dwg.	2004–224–1	FLORIDA CERTIFICATE OF AUTHORIZATION NUMBER: 00003653	Job. No.	250360
		180 Northeast 168th. Street / North Miami Beach, Florida. 33162	Dwg. No.	1025–041–2
Plotted:	6/6/25 11:26a	Phone: 305-653-4493 / Fax 305-651-7152 / Email fls@flssurvey.com	Sheet	1 of 3



Drawn By MAP
Cad. No. 250360
Ref. Dwg. 2004-224-1
Plotted: 6/6/25 11:26a

SKETCH OF DESCRIPTION

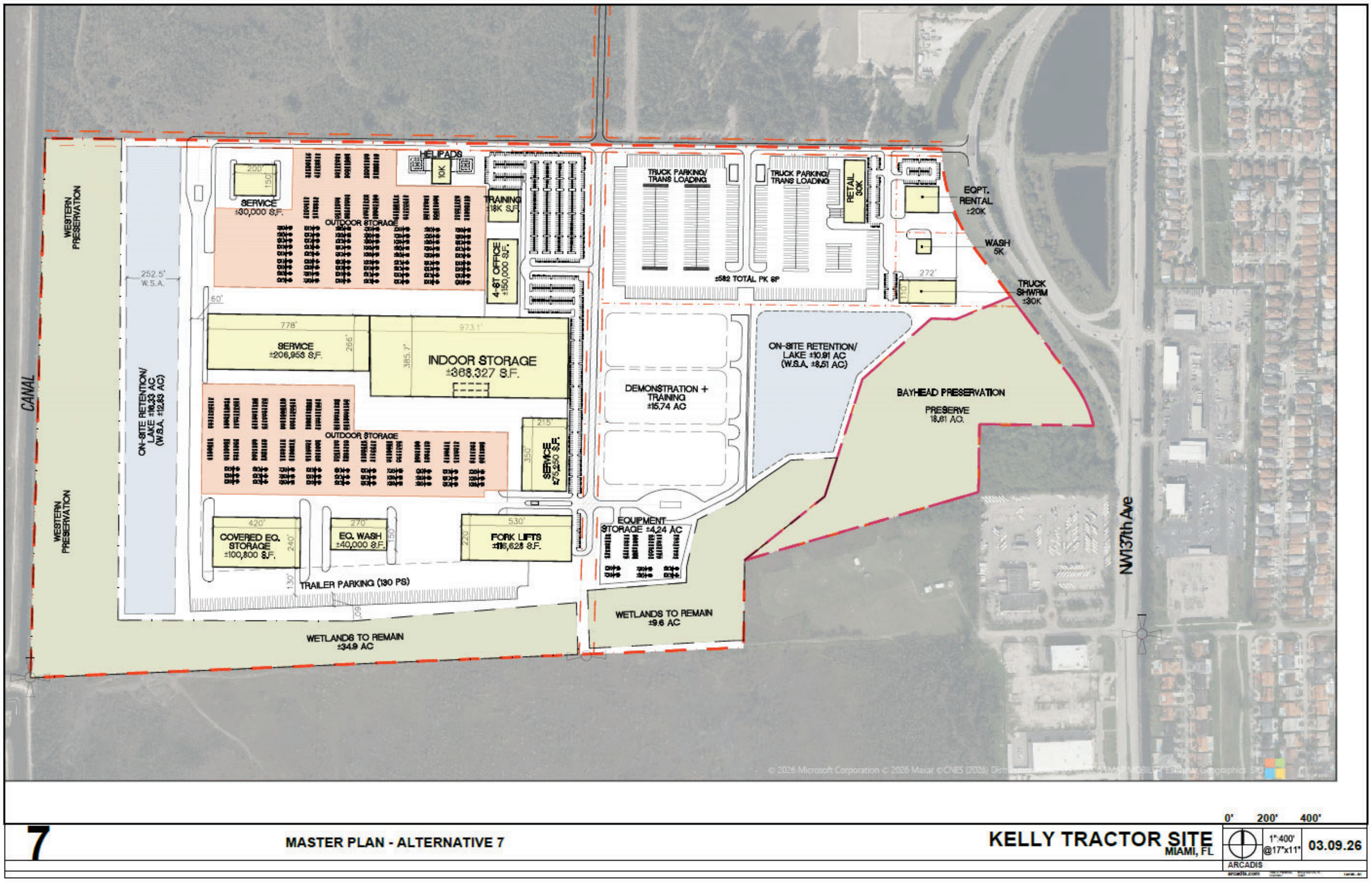
FORTIN, LEAVY, SKILES, INC.
CONSULTING ENGINEERS, SURVEYORS & MAPPERS
FLORIDA CERTIFICATE OF AUTHORIZATION NUMBER: 00003653
180 Northeast 168th. Street / North Miami Beach, Florida. 33162
Phone: 305-653-4493 / Fax 305-651-7152 / Email fls@flssurvey.com

Date 6/6/25
Scale 1"=600'
Job. No. 250360
Dwg. No. 1025-041-2
Sheet 2 of 3

#513870986_v20
74

EXHIBIT "C"

CONCEPTUAL SITE PLAN



#513870986_v20
75

MDC076

EXHIBIT “D”

PRESERVATION AREAS ON PROPERTY

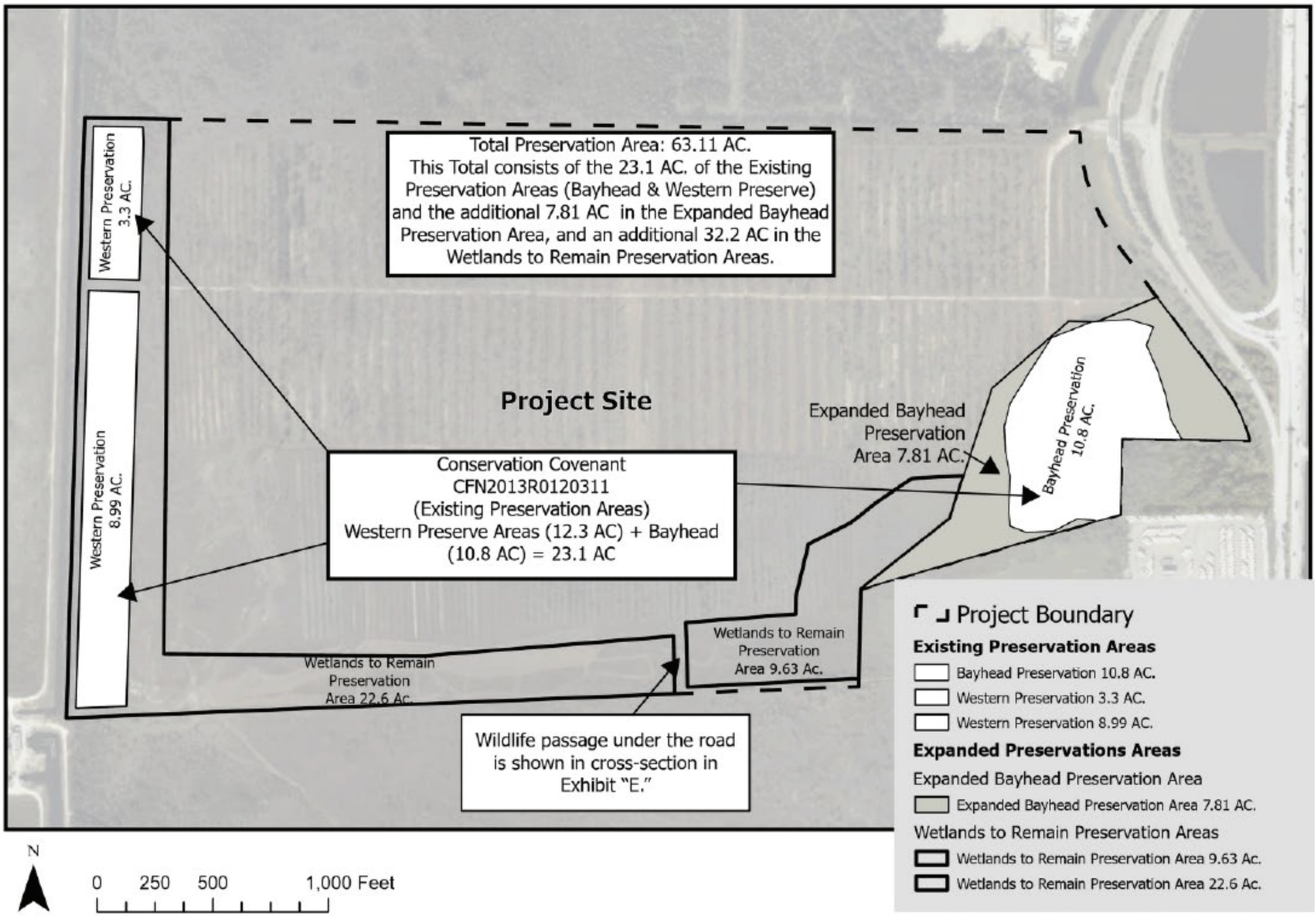


EXHIBIT "E"

<u>CROSS SECTION OF PROPOSED WILDLIFE CORRIDOR</u>

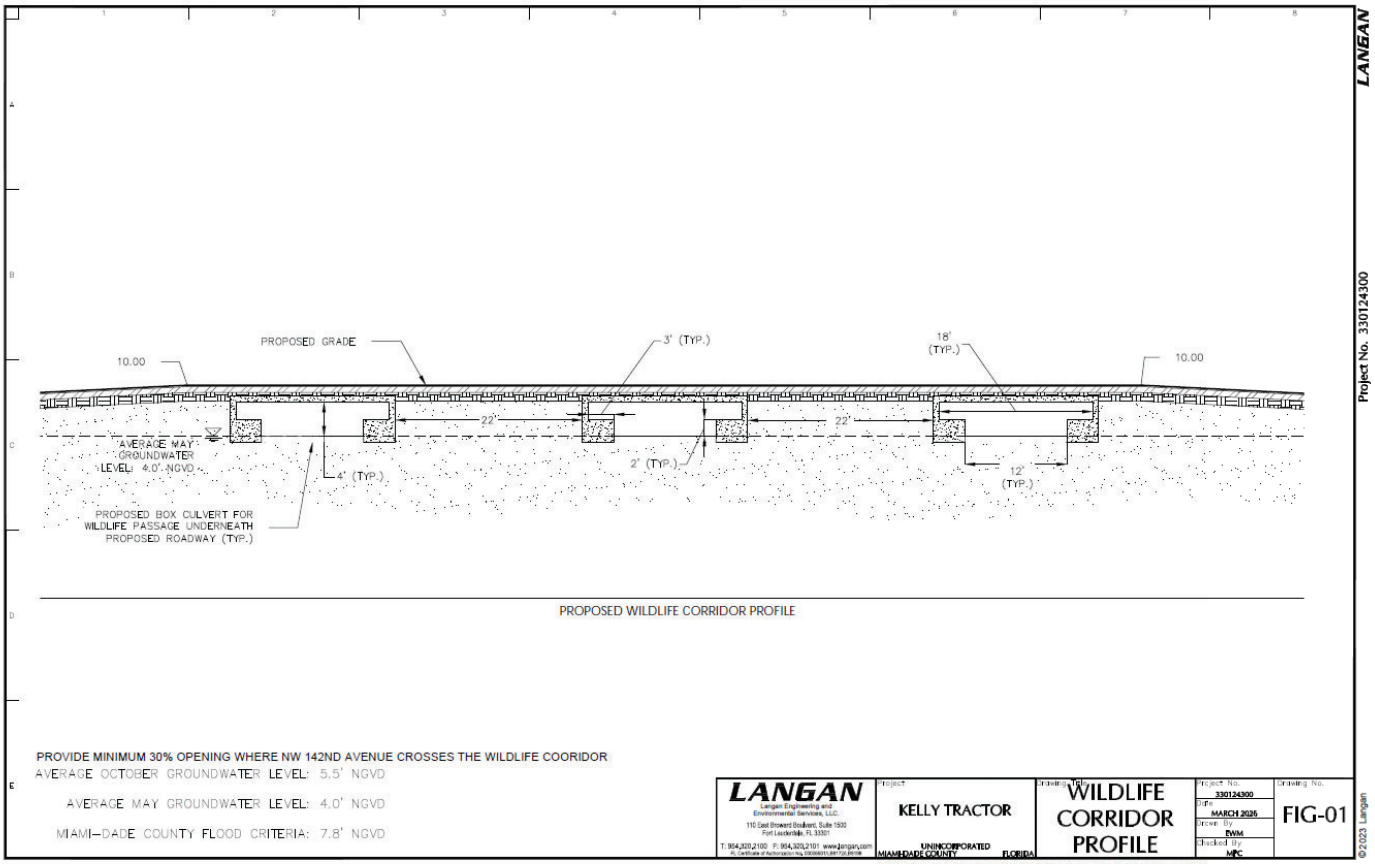


EXHIBIT "F"

LEGAL DESCRIPTION AND SKETCH FOR THE ARCHAEOLOGICAL SITE

SKETCH AND LEGAL DESCRIPTION

A portion of Government Lot 3 lying between Townships 53 South and 54 South, Range 39 East, being more particularly described as follows:

COMMENCE at the Southwest corner of said Government Lot 3; thence N87°34'44"E, along the South line of Government Lot 3, for a distance of 3429.60 feet; thence N00°51'03"E, for a distance of 420.00 feet to the POINT OF BEGINNING of the herein after described parcel of land; thence N51°28'46"E, for a distance of 492.10 feet; thence N17°47'48"E, for a distance of 592.03 feet; thence N48°41'29"E, for a distance of 440.86 feet; thence N74°35'29"E, for a distance of 394.49 feet; thence S36°59'44"E, for a distance of 492.02 feet to a point of curvature of a circular curve to the right, concave to the Southwest; thence southeasterly along the arc of said curve, having for its elements a radius of 608.00 feet, through a central angle of 23°36'54", for an arc distance of 250.59 feet; thence N89°19'56"W, for a distance of 551.65 feet; thence S00°51'03"W, for a distance of 326.97 feet; thence S73°44'48"W, for a distance of 1169.68 feet to the POINT OF BEGINNING.

Containing 810,495 Square feet or 18.61 Acres more or less by calculations.

J. BONFILL & ASSOCIATES, INC.
Florida Certificate of Authorization Number LB3398
7100 Southwest 99th Avenue, Suite 104
Miami, Florida 33173 Phone: 305.598.8383

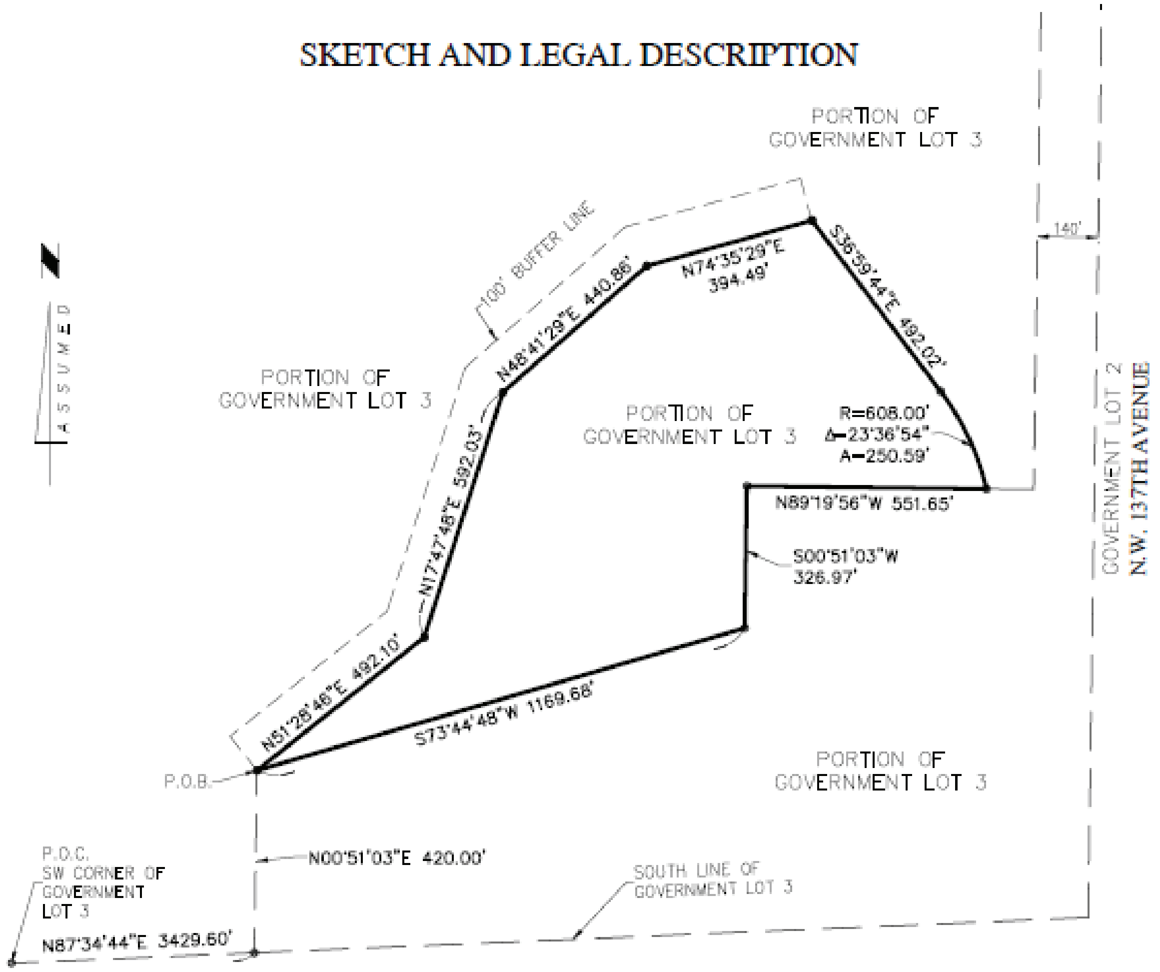
Project: 24-0161 Job: 24-0161 Sketch & Legal

NOTICE: Not valid without the signature and original raised seal of a Florida Licensed Surveyor and Mapper.

NOTICE:
Not complete without all Pages.

LEGAL DESCRIPTION -THIS IS NOT A SURVEY-	SKETCH AND LEGAL DESCRIPTION NW 137TH AVENUE AND NW 12TH STREET (REFERENCE) MIAMI-DADE COUNTY, FLORIDA 33182 PORTION OF GOVERNMENT LOT 3 DATE: SEPTEMBER 23RD, 2024

SKETCH AND LEGAL DESCRIPTION



LEGEND

P.O.B.	Point of Beginning	SEC.	Section
P.O.T.	Point of Termination	TWP.	Township
P.O.C.	Point of Commencement	RGE.	Range
P.B.	Plat Book	C/L	Centerline
PG.	Page	COR	Corner
R/W	Right-of-Way		

NOTICE:
Not complete without all Pages.

SKETCH
-THIS IS NOT A BOUNDARYSURVEY-

GRAPHIC SCALE
0' 175' 350'
SCALE: 1"= 350'

SKETCH AND LEGAL DESCRIPTION
NW 137TH AVENUE AND NW 12TH STREET (REFERENCE)
MIAMI-DADE COUNTY, FLORIDA 33182
PORTION OF GOVERNMENT LOT 3
DATE: SEPTEMBER 23RD, 2024

EXHIBIT 2

ADDITIONAL ITEMS
MAY 2023 CYCLE APPLICATION NO. CDMP20230013
TO AMEND THE COMPREHENSIVE DEVELOPMENT MASTER PLAN
(Additional Materials for July 21, 2026 Meeting)

Received 4/7/26
RER-Planning

CDMP20230013
Kelly Tractor

RESOLUTION NO. 2026-1802

A RESOLUTION OF THE VILLAGE COUNCIL OF BAL HARBOUR VILLAGE, FLORIDA, AFFIRMING SUPPORT FOR THE PRESERVATION OF THE MIAMI-DADE URBAN DEVELOPMENT BOUNDARY ("UDB") AS IT CURRENTLY EXISTS TO PROTECT DOWNSTREAM WATER RESOURCES, INCLUDING THE BISCAYNE AQUIFER, REGIONAL GROUNDWATER SUPPLIES, AND CONNECTED COASTAL WATERS, AS WELL AS THE EVERGLADES, WETLANDS, AND AGRICULTURAL LANDS; URGING THE MIAMI-DADE COUNTY BOARD OF COUNTY COMMISSIONERS TO UPHOLD COUNTY MAYOR DANIELLA LEVINE CAVA'S VETO OF THE PROPOSED DEVELOPMENT OUTSIDE THE UDB; URGING THE FLORIDA STATE LEGISLATURE TO OPPOSE ANY LEGISLATION THAT WOULD WEAKEN THE UDB IN THE MIAMI-DADE COUNTY CHARTER; ENCOURAGING ADVANCEMENT OF ATTAINABLE AND WORKFORCE HOUSING WITHIN THE UDB TO ADDRESS HOUSING AFFORDABILITY WITHOUT EXPANDING DEVELOPMENT INTO ENVIRONMENTALLY SENSITIVE LANDS; DESIGNATING THE PRESERVATION OF THE UDB AS A STATE LEGISLATIVE PRIORITY FOR BAL HARBOUR VILLAGE; PROVIDING FOR IMPLEMENTATION; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Urban Development Boundary ("UDB") in Miami-Dade County was established as a core growth-management tool to limit urban sprawl, protect environmentally sensitive lands, preserve agricultural areas, and safeguard natural systems critical to regional water supply and flood resilience; and

WHEREAS, lands located outside the current UDB include wetlands, agricultural soils, and open spaces that play a vital role in protecting downstream water resources, including the Biscayne Aquifer, regional groundwater supplies, and connected coastal waters, upon which Bal Harbour Village and other coastal communities depend for drinking water, environmental health, and resilience to flooding and sea level rise; and

WHEREAS, wetlands and prairies west of the UDB function as natural filtration and storage systems that support groundwater recharge, reduce pollutant loads, and maintain hydrologic connections between inland ecosystems, the Everglades, and downstream coastal waters; and

WHEREAS, the UDB also serves to protect South Dade agricultural lands by maintaining contiguous farming areas, preserving permeable soils, supporting food production, and preventing land-speculation pressures that arise when urban development expands into rural areas; and

WHEREAS, in January 2026, the Miami-Dade County Commission approved amendments to the County's Comprehensive Development Master Plan to allow development of a large heavy-equipment facility on hundreds of acres of predominantly protected wetlands outside the existing UDB, raising significant concerns regarding impacts to wetlands, water resources, flood control, and long-standing growth-management policies; and

WHEREAS, on February 2, 2026, Miami-Dade County Mayor Daniella Levine Cava vetoed the proposed development, citing the County's obligation to protect environmentally sensitive lands, uphold the integrity of the UDB, and ensure that development outside the boundary occurs only when there is a demonstrated and compelling public need consistent with long-range planning principles; and

WHEREAS, weakening or bypassing the UDB through legislative or administrative action risks accelerating sprawl into wetlands and agricultural lands, undermining Everglades restoration efforts, and increasing long-term public costs associated with infrastructure expansion, flood mitigation, and environmental degradation; and

WHEREAS, the Village Council of Bal Harbour Village recognizes that addressing housing affordability is a critical public-policy goal, and acknowledges that some developers have argued for expanding the UDB westward to accommodate industrial and commercial projects as a means to preserve sufficient land within the UDB for affordable and workforce housing; however, the Village Council believes that such housing objectives are best achieved through strategies within the existing UDB, including infill development, redevelopment, zoning reforms, and infrastructure-efficient growth, rather than by encroaching upon environmentally sensitive lands; and

WHEREAS, protecting upstream lands and water systems is directly tied to the long-term environmental, economic, and public-health interests of coastal communities such as Bal Harbour Village.

NOW, THEREFORE, BE IT RESOLVED BY THE VILLAGE COUNCIL OF BAL

HARBOUR VILLAGE, FLORIDA, AS FOLLOWS:

Section 1. **Recitals Adopted.** That the above stated recitals are hereby adopted and confirmed.

Section 2. **Support for Preservation of the Urban Development Boundary.** The Village Council hereby affirms its support for the preservation of the Miami-Dade Urban Development Boundary ("UDB") as it currently exists to protect downstream water resources, including the Biscayne Aquifer, regional groundwater supplies, and connected coastal waters, as well as the Everglades, wetlands, and agricultural lands.

Section 3. **Support for Mayor's Veto and Legislative Protection.** The Village Council urges the Miami-Dade County Board of County Commissioners to uphold County Mayor Daniella Levine Cava's veto of the proposed development outside the UDB and urges the Florida State Legislature to oppose any legislation that would weaken the UDB in the Miami-Dade County Charter.

Section 4. **Housing Policy.** The Village Council encourages the advancement of attainable and workforce housing within the UDB to address housing affordability without expanding development into environmentally sensitive lands.

Section 5. **Implementation.** The Village Clerk is hereby directed to transmit a copy of this Resolution to the Miami-Dade County Mayor, each member of the Miami-Dade County Board of County Commissioners, the Speaker of the Florida House of Representatives, the President of the Florida Senate, the Miami-Dade State Legislative Delegation, and other municipalities within Miami-Dade County.

Section 6. **Effective Date.** That this Resolution shall take effect immediately upon the adoption hereof.

PASSED AND ADOPTED this 17th day of March, 2026.

INCORPORATED 1946 BAL HARBOUR VILLAGE MIAMI-DADE COUNTY, FL

Mayor Seth E. Salver

ATTEST:

Dwight S. Danie, Village Clerk

APPROVED AS TO FORM AND LEGAL SUFFICIENCY:

____

Village Attorney
Weiss Serota Helfman Cole & Bierman P.L.

APPROVED
By Jerry Bell at 4:34 pm, May 05, 2026

Received 5/5/26
RER-Planning

Kelly Tractor
CDMP20230013

Holland & Knight
701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Alessandria San Roman, Esq.
(305) 789-7580
alessandria.sanroman@hklaw.com

May 5, 2026

VIA ELECTRONIC MAIL

Mr. Jerry H. Bell, AICP
Assistant Director for Planning
Department of Regulatory and Economic Resources
Miami-Dade County
111 NW 1st Street, 12th Floor
Miami, Florida 33128

RE: Kelly Tractor Company (the "Applicant") / Application No. CDMP202300013 / Second State Request to Extend Date of Second Public Hearing

Dear Mr. Bell:

On behalf of Kelly Tractor Company, we request an extension for the hearing of the above-referenced Comprehensive Development Master Plan ("CDMP") amendment application. According to Florida Statutes §163.3184(3)(c)1:

> "The local government shall hold a second public hearing, which shall be a hearing on whether to adopt one or more comprehensive plan amendments pursuant to subsection (11). If the local government fails, within 180 days after receipt of agency comments, to hold the second public hearing, and to adopt the comprehensive plan amendments, the amendments are deemed withdrawn unless extended by agreement with notice to the state land planning agency and any affected person that provided comments on the amendment. The 180-day limitation does not apply to amendments processed pursuant to s. 380.06."

The Florida Commerce Bureau of Planning and Growth acknowledged transmittal of the amendment application on July 31, 2025 with the last agency comment received on August 27, 2025. The Applicant held a second public hearing to adopt the proposed CDMP amendment application on January 22, 2026. However, on February 1, 2026, the Mayor of Miami-Dade County vetoed the approval of the proposed CDMP amendment application. In the veto hearing scheduled for February 18, 2026, the Board of County Commissioners voted to reconsider the CDMP amendment application. The Applicant received approval for a prior extension request to June 1, 2026. Given the recent deferral of the item to the June 2, 2026 Board of County Commissioners hearing, the Applicant is requesting a second extension until August 22, 2026 in order to hold a final public hearing on the CDMP amendment application.

Thank you for your considerate attention to this matter. Should you have any questions, please do not hesitate to contact me at (305) 789-7580 or alessandria.sanroman@hklaw.com regarding the request.

Sincerely,

HOLLAND & KNIGHT LLP

Alessandria San Román

Alessandria San Roman

Enclosures

Cc: Ms. Lourdes Gomez, AICP
Mr. Garett Rowe
Ms. Rosa Davis
Mr. Alexander Dambach
Abbie Schwaderer-Raurell, Esq.
Joseph G. Goldstein, Esq.

From: Robert Jacobson <hello@robertjacobson.com>
Sent: Monday, June 1, 2026 11:36 AM
To: Info (RER) <RERInfo@miamidade.gov>
Subject: Request for Comprehensive Review: Kelly Tractor Development and Urban Development Boundary Compliance

Dear Miami-Dade County Department of Regulatory and Economic Resources,

I submit this formal request for a comprehensive environmental and land-use review of the Kelly Tractor development proposal before any staff approval or commission recommendation is issued.

PROJECT OVERVIEW

The proposed Kelly Tractor development involves 200 acres of industrial and office development proposed in Miami-Dade County adjacent to lands governed by the Urban Development Boundary.[1] The project's location and scope raise significant questions about growth management policy compliance and environmental impact assessment.

SCOPE OF REVIEW REQUESTED

Your department should evaluate and document findings on the following issues:

1. Urban Development Boundary Compliance
- Whether the project location falls inside or outside the voter-approved UDB

- What land-use designation applies to the site under the Miami-Dade Comprehensive Plan
- Whether the applicant has requested UDB modification, and if so, what criteria support or deny such modification
- Precedent implications if this exception is granted to other applicants

2. Environmental Resource Assessment
- Wetlands delineation and jurisdictional determination
- Impacts to groundwater and surface water systems relative to Everglades hydrology
- Wildlife corridor disruption, particularly for state and federally listed species
- Stormwater quality and quantity relative to existing infrastructure and Everglades water quality standards
- Cumulative impacts if similar exceptions are granted for adjacent or nearby properties

3. Comprehensive Plan Consistency
- Compliance with the Growth Management Element of the Miami-Dade Comprehensive Plan
- Compliance with the Conservation and Coastal Protection Element
- Compliance with the Infrastructure and Public Facilities Element (traffic, stormwater, water supply, wastewater)
- Compliance with the Intergovernmental Coordination Element regarding coordination with the South Florida Water Management District

4. Development Impact Analysis
- Long-term fiscal impact of development outside the UDB (infrastructure costs, service extension requirements)
- Comparison of infrastructure costs for this location versus in-UDB alternative sites
- Feasibility of traffic, water, and stormwater management relative to existing county systems

5. Alternatives Analysis
- Whether in-UDB sites exist that could accommodate similar development with lower environmental impact
- Whether the applicant has considered alternative locations or reduced footprints that remain within the UDB

PRECEDENT AND POLICY CONSIDERATIONS

The Urban Development Boundary represents a voter-approved growth management tool adopted to contain sprawl and protect agricultural productivity and natural ecosystems. The boundary was established through a deliberate public process and has remained largely intact for decades.

Approval of this project would constitute the first significant exception to the UDB in recent years and would establish a precedent for future requests. Any approval should be accompanied by clear analysis of what policy framework will govern subsequent requests for similar exceptions.[2]

REQUEST FOR PUBLIC DOCUMENTATION

I request that your department's findings on each of the above issues be documented in a formal staff report and released publicly at least 10 business days before any commission consideration of this project. This timeline allows commissioners, state agencies, and the public to review your assessment before voting.

The documentation should include:

- A clear statement of whether the project complies with applicable land-use regulations and the Comprehensive Plan
- All environmental impact findings, including both positive and negative effects
- Recommended conditions, modifications, or denials with supporting rationale
- Analysis of precedent implications
- Coordination findings from state agencies including the South Florida Water Management District and Florida Department of Environmental Protection

TIMELINE

I understand that the commission may consider this project on or around June 2, 2026.

SOURCES

[1] Miami-Dade County Department of Regulatory and Economic Resources. Urban Development Boundary mapping and Comprehensive Plan. https://www.miamidade.gov/global/economy/planning/home.page

[2] Florida Statutes, Chapter 163, Growth Management Act. https://www.flsenate.gov/Laws/Statutes/2025/chapter163; American Planning Association. Land-Use Policy and Environmental Protection. https://www.planning.org/

I appreciate your attention to this request and your department's commitment to transparent, thorough review of significant development proposals.

Respectfully,

Robert Jacobson

From: Tovah Klingler <tovahklingler13@gmail.com>
Sent: Tuesday, June 2, 2026 10:09 AM
To: Info (RER) <rerinfo@miamidade.gov>
Subject: Kelly Tractor/ Everglades Development- item 7D

This message is for Lourdes M. Gomez, and The Miami-Dade County Planning Division,

I am writing to implore you to deny Kelly Tractor to pave and develop further into the Everglade National Park. Please vote no, and I encourage you to also deny any further development for the future. Florida doesn't need more roads, or development into protected lands and natural resources.

Thank you for you time.

Tovah Carter

Jacksonville Beach Resident

Sent from my iPhone

TROPICAL AUDUBON SOCIETY

SOUTH FLORIDA'S VOICE OF CONSERVATION

Received 5/20/26
RER-Planning

CDMP20230013
Kelly Tractor

July 15, 2025
Board of County Commissioners
Miami Dade County
111 NW 1st Street, Suite 220. Miami, FL 33128
Sent via email

Subject: DENY the Kelly Tractor Application (CDMP20230013) – Protect Our Remaining Wetlands

Dear Honorable Chair and Commissioners,

On behalf of Tropical Audubon Society, we respectfully urge you to deny the Kelly Tractor application. The proposal seeks to amend the CDMP Land Use Element by adding the "MIA Equipment and Supportive Services Area" designation to the "Open Land" land use category, enabling industrial development on approximately 246 acres of ecologically sensitive land—including Wetlands of Regional Significance, agricultural areas, and 50 acres within Urban Expansion Area 1 (UEA-1). The development would have irreversible consequences for our environment, our water resources, and the wildlife that depend on these habitats. It would also further erode the planning integrity of Miami-Dade's Comprehensive Development Master Plan (CDMP).

As highlighted in the 2019 Urban Expansion Area Report, this site presents a fundamental internal inconsistency within the CDMP: wetlands that "should be avoided" for development are located within a designated UEA. The report clearly states that the remaining portions of the Kelly Tractor site "would generally be considered least suitable for future growth" due to their Wetlands of Regional Significance designation. Within the proposed application area are 162 acres of Wetlands of Regional Significance, 63 of which are under restrictive covenants stemming from prior unauthorized work conducted by this very applicant. Despite this history, the current application provides no meaningful or feasible mitigation strategy to replace or preserve these wetlands.

These wetlands are not just regulatory classifications—they are critical to Miami-Dade County's efforts to restore Biscayne Bay, safeguard drinking water, provide flood protection, and maintain habitat for imperiled species. The site lies within the core foraging area of the federally threatened wood stork, and within consultation zones for the endangered Everglade snail kite and Florida bonneted bat. The seasonally flooded agricultural fields and open wetland areas also support protected wading birds such as the roseate spoonbill, little blue heron, and tricolored heron, all of which are facing habitat loss at alarming rates.

Approving this application would compromise the integrity of the County's own long-range planning efforts and conservation goals aimed at protecting imperiled species and fragile ecosystems. We urge you to act in the best interest of Miami-Dade's long-term environmental and community resilience by rejecting the Kelly Tractor application. Our County should be prioritizing the protection of remaining wetlands, green space, and agricultural lands — not converting them into industrial development that would permanently degrade the health of our natural systems.

Thank you for your consideration and your continued leadership.

Sincerely,

Lauren Jonaitis

Lauren Jonaitis
Senior Conservation Director
Tropical Audubon Society

5530 Sunset Drive Miami, FL 33143 | 305.667.7337 | www.tropicalaudubon.org

TROPICAL AUDUBON SOCIETY

SOUTH FLORIDA'S VOICE OF CONSERVATION

Received 5/20/26
RER-Planning

CDMP20230013
Kelly Tractor

February 12, 2026
Board of County Commissioners
Miami Dade County
111 NW 1st Street,
Miami, FL 33128

Subject: Support for Mayor's Veto of the Kelly Tractor CDMP Amendment (CDMP20230013)

Dear Honorable Chair and Commissioners,

I write on behalf of Tropical Audubon Society to express our strong support for Mayor Daniella Levine Cava's veto of the Kelly Tractor CDMP amendment (CDMP20230013). The veto reflects prudent leadership and is necessary to safeguard Miami-Dade County's land-use planning framework, protect sensitive natural resources, and maintain public trust in the Comprehensive Development Master Plan (CDMP).

As approved, this amendment alters the CDMP Land Use Element through a text change that would allow industrial development on roughly 246 acres currently designated as Open Land. The affected area includes extensive Wetlands of Regional Significance, agricultural lands, and property within Urban Expansion Area 1 (UEA-1). This action would authorize permanent industrial use on lands that play an essential role in water management, habitat connectivity, and climate resilience.

Beyond the site-specific impacts, the broader implications of this approval are deeply concerning. The use of a text amendment in this context represents a departure from established CDMP review standards and enables a substantial policy shift without the level of analysis and public engagement such changes warrant. This approach sidesteps the intent of the Evaluation and Appraisal Report (EAR) process, which was created to evaluate growth and land-use policies in a comprehensive, transparent, and community-driven manner. Allowing major planning changes outside of that process weakens the CDMP's authority and invites further erosion of Miami-Dade's growth management safeguards. Upholding the Mayor's veto and returning any policy considerations to the EAR cycle is critical to maintaining the credibility of the County's planning system.

The environmental stakes are equally high. The wetlands within the project area are indispensable public resources that contribute to Biscayne Bay recovery, groundwater protection, flood storage, and regional ecological health. The site provides important habitat for federally protected species, including the threatened wood stork and endangered Everglade snail kite and Florida bonneted bat. It also supports state-threatened wading birds such as roseate spoonbills, little blue herons, and tricolored herons, species whose populations are already under pressure due to widespread habitat loss.

Supporting the Mayor's veto affirms a commitment to responsible growth that aligns with adopted plans, established processes, and the long-term well-being of Miami-Dade's communities and natural systems. Upholding CDMP standards ensures that development decisions are durable, predictable, and grounded in the framework designed to guide growth countywide.

For these reasons, we respectfully urge you to uphold the Mayor's veto and reaffirm your commitment to responsible planning, environmental stewardship, and the long-term interests of Miami-Dade County residents.

Sincerely,

Lauren Jonaitis

Lauren Jonaitis
Executive Director
Tropical Audubon Society

Received 5/21/2026
RER-Planning

Kelly Tractor
CDMP20230013

Technical Memorandum

KELLY TRACTOR NEW HEADQUARTERS
MIAMI DADE COUNTY NEEDS ASSESSMENT

Lambert
ADVISORY

JUNE 2026

Summary of Findings

Lambert Advisory has completed its assessment of the need for the Kelly Tractor proposed headquarters associated with CDMP Application CDMP20230013. Lambert's needs assessment is broken into both the traditional needs assessment associated with CDMP Land Use Element LU-8F and the alternative needs assessment requested by members of the County Commission to determine the importance of a state-of-the-art Kelly Tractor new headquarters campus to critical community and economic needs, and Kelly's need to develop a headquarters facility on 150 net acres to serve the market and the broader community.

Key findings and page references for this technical memorandum are as follows:

- As with prior letters written by other consultants and submitted by the applicant in 2024 and 2025, the traditional needs analysis associated with LU-8F we have just completed with updated information clearly indicates that there is far too little industrial land in Miami-Dade County to support industrial space demands for the next 10 years inside the UDB. Likewise, the North Central Planning Tier and MSA 3.2 more specifically, also do not have adequate vacant or appropriate land to accommodate demand for modern industrial and distribution space over the next 10 years inside the UDB (*page 22*). This finding is inconsistent with county staff's own memorandum, but our analysis herein clearly shows that the staff assessment is based upon either incomplete data or is the result of ignoring the realities of developing county identified potential industrial properties in light of market trends in the County.
- Kelly Tractor, the Southern Florida distributor for Caterpillar ("CAT"), is the dominant providers of heavy infrastructure and construction equipment in South Florida as is CAT globally. Over the past 12 months Kelly has maintained greater than 40 percent market share, and inclusive of their wholly owned electric generator subsidiary, have generated $650 million a year in revenue from sales, rental, parts, and service of equipment on average over the past several years (*page 15*). U.S. headquartered Caterpillar (*NYSE: CAT*), the world's leading heavy equipment brand, is looking for its regional distributers to develop campus like facilities that better serve the needs of customers and best represent the quality and dominance of the brand. Caterpillar's long term business strategy, often cited as the reason for their global dominance, is to treat customers as partners by providing wraparound services well beyond sales, repairs, and parts. These services include operator training, storage/renewal and resale, as well as funding. The campus planned by Kelly is a state-of-the-art statement of CAT's market dominance but also is partially driven by the company's need to compete with increasingly strong Chinese competitors as the heavy equipment industry transitions to battery powered equipment, a technology where the Chinese currently maintain an edge. As an example, batteries and battery powered equipment requires substantially more indoor climate controlled storage space than diesel powered equipment of the past. Kelly's campus plans are organized to serve the battery driven powertrain transition well into the future, while Kelly's current headquarters facility, with its functionally obsolete buildings, is unable to accommodate these forward looking requirements over the next five to ten years.

Figure A: The Future – CAT Battery Powered Equipment

- Kelly Tractor's existing 55-year old headquarters is functionally obsolete with non-climate controlled buildings that lack dock height loading for trucks and is far too constrained to support its operations going forward.

Figure B: Examples of Functional Obsolescence of Current Facilities - Motor refurbishment in ground plain non-climate controlled building; Parts warehouse 2nd level catwalk.

- County staff have pointed out that more than 9 acres of land is available to Kelly for construction of a building on a vacant parcel owned by the company currently utilized for overflow storage. However, based upon zoning and functionality, a building designed for that site could be a maximum 150,000 square feet, loaded from only one side, and given the parcels location is separated from the primary existing Kelly facilities by a 65-foot wide busy three lane public right-of-way making its functionality limited for operations and far too small to accommodate the company's growth needs. From the community's perspective Kelly's growth needs include providing uninterrupted critical services during natural disaster/hurricane recovery, Everglades restoration, and support for key infrastructure projects including water/sewer improvements, the capital program at MIA, and Port Miami improvements (*page 11*).
- As it relates to hurricane recovery specifically, Kelly is a central player in the immediate support and restoration efforts following natural disasters, particularly following hurricanes. The new headquarters property, with over 100 acres of paved open space, equipment washing stations, service support, and central west location with ready highway access will serve as a key hurricane

recovery and restoration staging and service area for the entire county in the case of major storm events. As the distributor and lessor of CAT generators in the region through the Kelly's Pantropic subsidiary at any given time Pantropic has 100 generators with a combined 115 MW of generating capacity (equivalent to a midsized utility powerplant) located in its facility in Miami-Dade. The company is positioned to immediately deploy generators to support critical community and safety functions such as hospitals, nursing homes, municipal buildings, etc. Indeed, approximately 90 percent of the health care network in South Florida that have generators have installed CAT generators to provide power during periods when utility power is unavailable. In major storms, and indicative of CAT's "DNA" for partnership relationship with customers, during major storms Kelly technicians are stationed at hospitals which run CAT generators so that if there is ever an issue with the generator systems, service response is immediate. Likewise, for extended outages, Kelly maintains its own fleet of fuel trucks with 2,500 gallon capacity each in order to provide fuel to customers who cannot or are having difficulty getting fuel deliveries to feed generators following storms. During the last major storm to impact Miami-Dade, Hurricane Irma in 2017, Kelly not only deployed all of its generators; deployment of heavy equipment in inventory at its headquarters increased by more than 50 percent during the first 90 days following the storm (*page 11*). Not having an appropriate modern facility has the potential to leave gaps in Kelly's ability to service the needs of the community during these critical recovery periods.

Figure C: Kelly subsidiary Pantropic Power CAT generators ready to be deployed in event of natural disaster.

- As it relates to the Everglades Restoration, Kelly is the principal provider of construction equipment for the project and recently delivered 40 pieces of equipment to the most recent $1.0 billion phase of the project that will require double the amount of earth movement than during the construction of the Hoover Dam. Pantropic, the company's generator arm, has installed, maintains and services all of the pump station generators for the U.S Army Corps of Engineers associated with CERP. The western location of the new headquarters campus will allow the company to better access and serve the needs of the CERP (*page 12*).

Figure D: Kelly equipment at the Everglades Agricultural Area (EAA) Reservoir working to reduce harmful discharge from Lake Okeechobee and ensure clean water flow into the Everglades to the south in the future.

- The ability to connect the proposed campus to rail is another benefit of the new facilities. Rather than shipping and receiving product from the manufacturing plant by roadway, Kelly will now have the option for receiving and shipping new and used equipment by CSX rail, thereby reducing road trips. This is particularly important given much of the equipment requires wide loads and multiple truck trips versus what can be consolidated into a single rail trip. Additionally, rail will also help reduce the impact of wear and tear on the roads with the heavy engines and equipment that have higher than normal weight limits. Likewise, during times of natural disasters where road access is impeded or difficult, the link to rail will allow Kelly's sister network of distributors nationwide to deliver generators and equipment critical to the recovery effort via train vs. truck. This is expected to provide an alternative means and speed up the delivery of equipment in times of disaster and need.
- While CAT maintains a global network of distributors, given Kelly's location in South Florida, the company has long provided secondary inventory sales and parts support to CAT in the Caribbean Basin and Latin America. This is especially the case in peak times of need such as following natural disasters (i.e. earthquakes, hurricanes) but also when major shift in governance occurs in large potential markets as is currently the case in Venezuela. Rich in natural resources, both in petroleum and rare earth minerals, and in need of broadscale infrastructure renewal following decades of disinvestment, companies are rushing to Venezuela to support the redevelopment of the country and support the restoration of the petroleum and mining industries, two sectors where CAT is a dominant and critical player. Given the lack of a modern distribution network in Venezuela following decades of disinvestment, Kelly will be a central player in supporting the rebuilding of Venezuelan industry and infrastructure for the foreseeable future providing the network support needed for equipment, parts, and training. The new Miami HQ campus will be central to quickly and efficiently fulfilling this need, and will position Kelly to continue as the leading secondary supplier for the Caribbean and Latin America regions well into future as those regions continue to evolve and closed markets liberalize (*page 13*).

- Although population and household growth will slow over the next 35 years in the 13-county region which Kelly serves as the largest counties have decreasing amounts of land to support housing development, annual employment growth is expected to increase by nearly 20 percent and Earnings, Personal Income, and most importantly, Gross Regional Product (the broadest measure of regional economic expansion) will grow by more than double on an average annual basis between 2025 and 2060 above what it grew between 1970 and 2024. This substantial expansion of economic growth, significantly driven by inflow of capital, incomes, tourism and investment will drive new private construction, additional infrastructure investment, and related community facility expansion at a level not experienced in the past. For Kelly and CAT, this significantly enhanced expansion will drive new levels of demand for construction equipment throughout the region and is indicative of the need for significantly expanded facilities to accommodate that demand. Over the next 35 years Gross Regional Product in real terms (uninflated) is expected to grow by 2.3 times, total personal income by 2.2 times and earnings by 2.3 times. In that context, it appears entirely reasonable that Kelly is seeking to expand its indoor footprint by 2.8 times, and outdoor areas in the near term particularly given that the expansion will allow the company to consolidate several functions around parts, sales and storage and restoration of equipment that is currently occurring in satellite locations throughout the region (*page 14*).

Introduction

This Technical Memorandum (Memo), prepared by Lambert Advisory (Lambert) addresses two questions which have been raised by Miami Dade County staff and members of the Board of County Commissioners associated with the "need" for the proposed modification of the CDMP requested through Application No. CDMP20230013 submitted by Kelly Tractor Company.

The two requested "needs" assessments are distinct from one another.

The first Needs Assessment requested by the County is for Kelly Tractor to provide economic and market support to indicate that the company actually has a requirement for the 150 +/- net acres[1] available at the site subject of the application in order to build a proposed state-of-the-art campus and to describe how the new campus will better serve to support critical needs of the Miami-Dade community and key industries (i.e. Natural Disaster Response/Restoration, Everglades Restoration, Mining). This campus will replace the company's fifty (50) acre headquarter facility initially built 55 years ago and currently located along NW 58th Avenue west of the Palmetto Expressway in unincorporated Miami Dade County.

Kelly Tractor Headquarters: Current & Proposed Locations

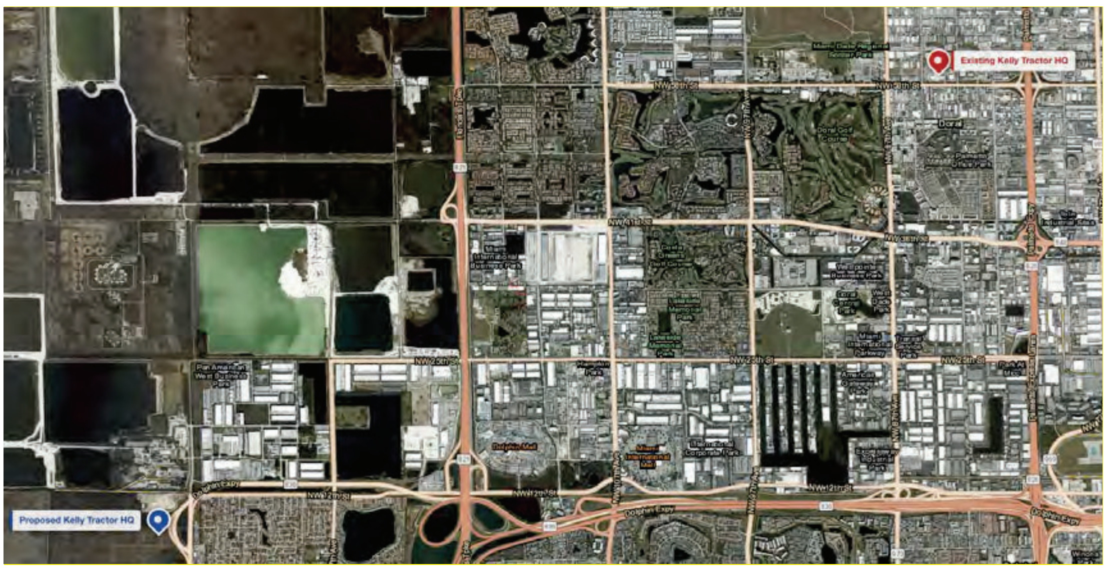


Figure 1. Current Kelly Tractor headquarters and proposed headquarters location in western Miami-Dade County

The second needs analysis, addressed and provided as part of this memo, is a *traditional* needs assessment associated with applications for expansion of development beyond the current UDB and is responsive to LU-8F of the CDMP's land use element. The *traditional* assessment is aimed at determining if existing land inside the UDB contains adequate commercial/industrial vacant land within County designated Planning Tiers and Minor Statistical Areas (MSA) to support the absorption of commercial/industrial space for the next 10 years. If not, the finding may provide a justification exists for expanding the boundary of the UDB to accommodate 10 years of growth. While we provide an updated *traditional* needs assessment as part of this memorandum, the applicant previously provided the *traditional* needs analysis associated with the application in 2024 with further backup provided in 2025. We have updated the traditional needs analysis

[1] Net acreage subtracts from gross acreage non-buildable or non-usable areas that are designated or designed for wetlands, retention, and expected ROW acquisition by GMX.

herein to further provide support to the prior conclusion that industrial land availability is inadequate for modern industrial development within the UDB during the next 10 years.

The Kelly CDMP submission requests the County allow for the development of a 246 +/- gross (150 +/- net) acre property as a state-of-the-art campus for Kelly's operations in an area located immediately outside of the Urban Development Boundary (UDB) but partially within the County's Urban Expansion Area (UEA). Details of Kelly's business model and operations in Miami Dade County are provided below, but Kelly has owned the proposed headquarters property since 1984 with the long term objective of relocating the company's operations to the site. The property is located just west and south of the current western terminus of the Dolphin Expressway (SR 836). Although SR 836 is currently an east/west expressway, the plan has long been to add a southern leg to the expressway. This southern turn to SR 836 is expected to require a significant right-of-way acquisition of the Kelly site.

This memorandum has been prepared to provide the update to the *traditional* needs assessment of broader land availability for industrial and related use and, in close coordination with Kelly Tractor Company, also answer the County's request to provide an evaluation of benefit to critical community objectives/needs and industry of the new campus and market support for the need of Kelly to develop the campus on 150 +/- net acres to replace the company's functionally obsolete 1970 era headquarters. The remainder of this memorandum details the analysis.

Needs Analysis I
Critical Community Need & Kelly Tractor Requirement for State-of-the-Art New Headquarter Campus on 150 +/- Net Acres

Kelly is the exclusive distributor for The Caterpillar Company ("CAT") covering 13 counties in southern Florida. CAT equipment accounts for approximately eighty (80) percent of Kelly sales.

It is impossible to appreciate the importance of a modern and functional Kelly Tractor facility to critical community needs and Kelly Tractor's need for an expanded headquarters campus given the rapid changes in battery and other technology in the heavy equipment sector without understanding the ecosystem model under which CAT operates as well as the importance of the company to natural disaster recovery, Everglades restoration, heavy construction, mining, international support of heavy equipment needs in the Caribbean Basin and Latin America, and the temporary and support power needs of South Florida.

The Caterpillar Company

Like few American manufacturers of large machinery that continue to manufacture in the United States, Caterpillar remains the global leader in its sector. With nearly 16 percent of global market share, 25 percent of the United States' construction equipment sales[2] , and an incredible 40 +/- percent of the heavy construction equipment market, CAT is the only true dominant global firm in its sector. As a benchmark, G.M. which has the most sales among autos and light trucks has only a 17 percent market share in the United States.

CAT is most comparable to Nvidia or Boeing as dominant American producers which have significant American manufacturing capacity and are leaders on a global scale[3].

CAT has always led by being the great innovator in equipment for the construction and mining industry, and enhancing efficiency and worker safety over the company's entire 100 years of being in business. Even before Caterpillar's formal founding, one if its predecessors, Holt, replaced wheels with tracks so that machinery would not sink in soft soil, mud, creeks and gullies and continue to be ubiquitous on construction equipment today. It was this innovation that by World War I provided military planners the technological solution necessary to design the modern tank, ultimately breaking the casualty heavy trench warfare stalemate that existed during the War.

In the early 1930's, CAT placed the first diesel engine in heavy construction equipment significantly enhancing the efficiency of the machines and creating the fuel and powertrain standard that has driven the entire industry since. During the same period, the yellow color found on construction equipment throughout the industry became a standard during a period where worker and operator safety became front-and-center of both CAT, their customers and government regulators.

[2] The company with the second most market share, Komatsu has approximately 11.2 percent of the market, followed by John Deere with 5.5% and the Chinese XCMG with 5.4 percent. Both XCMG and Sany, the 4th and 7th ranked construction equipment companies now have U.S. headquarters in Georgia with a core focus on the Southeastern U.S. market in direct competition with CAT.

[3] Apple iPhone and Cisco as American products also are similar in terms of global dominance but manufacture a very small percentage of their product in the United States; even Nvidia contracts with 3rd parties in the U.S. for the company's chip production.

In the subsequent 80- to 90-years, CAT has continued as the dominant force in construction equipment innovation developing hybrid engines for greater fuel efficiency, on board computers and cameras to monitor efficiency/improve safety and provide 360-degree visibility, and GPS systems to guide equipment and ensure material, buildings and sites are built exactly to plans and specifications.

Today, the biggest challenge that CAT is tackling from a technology perspective since the first diesel engines in the 1930's is the transition from diesel to battery powered engines which have the range, power and capacity to drive the equipment which is so central to the success and future of the construction and infrastructure industry. Unlike the past however, where innovation in the industry was almost always driven by CAT, CAT is now facing two Chinese competitors who have the benefit of China's recent dominance in battery technology, production, and infrastructure purpose built for the needs of battery driven machines and equipment (charging speed, adequate storage, replacement/repair facilities, etc.). Both competitors now have North American headquarters in Georgia with the goal of expanding rapidly in the U.S. market. With the exception of necessary enhancements to the electric grid, the Chinese competitors can easily apply these innovations to facilities which will be built throughout the United States to better serve customers, leaving legacy facilities serving CAT or John Deere well behind on the technology curve. These facility enhancements include climate controlled facilities to maintain maximum battery performance and capacity, facilities which are designed for rapid swapping of batteries in machines, and repair and maintenance facilities specifically designed for battery driven propulsion rather than diesel propulsion.

As it relates to Kelly, the proposed headquarter campus is designed for the future not the past and includes key components which will allow the CAT and Kelly to be competitive with international manufacturer competition well into the future of electric based heavy equipment. The functional obsolescence of the current headquarters facilities makes it impossible for Kelly to provide these components within the current operating envelope and building structure. These components include the following with more detail provided further in our report.

- Significantly expanded indoor space for battery and other technology which require shading from direct sunlight and climate control to maintain peak performance. The is not only about the future, but current needs. At any given time, as much as 100 electric forklifts on the Kelly site are being stored in outdoor uncovered space. This storage significantly impacts the battery performance and life of the forklifts. As larger equipment converts to battery and hybrid technology, the demand for indoor space will only be exacerbated.

Figure 2: Less than optimal storage of electric forklifts due to lack of indoor space

- Operator training demands are expected to expand substantially as the equipment transitions from diesel to battery technology. The new campus is designed with expanded training space, but in classrooms/simulators and outdoor areas to accommodate this transition and need for expansive training of operations from both the region, Caribbean, and parts of Latin America.
- As the technology transitions, long time operating partners will be trading in older equipment for new machines and Kelly is expecting that the resale business to markets outside of the United States, particularly in the Caribbean and Latin America, will expand as well. The campus is designed to accommodate significantly more used equipment for both refurbishment and resale to a much broader market area.

All of this needs to be understood in the context of the CAT operating model and its focus on customer experience and service. What has always set CAT apart from its competitors and often cited as the reason for its dominance is, like Boeing, CAT has a long history of establishing deep partnership with its customers and an established ecosystem around that partnership. Beyond sales of construction equipment and service, this partnership extends to training of operators for maximum efficiency and the integration of new technologies, safety procedures and systems, storage of customer equipment when not mobilized, refurbishment and resale of equipment on the global market when machines are no longer required, rental of equipment for short term use, power generation where utility infrastructure is inadequate or in time of natural disasters, shipping and delivery of equipment among other services.

While Boeing establishes relationships directly with airlines at a corporate level, CAT has a long established network of regionally defined distributorships which provide many if not all of those ecosystem services and programs. Kelly Tractor has long been CAT's distributor for the 13 counties in South Florida which are home to nearly 40 percent of the State of Florida's population and more than 41 percent of the State's employment.

Beyond the technological change to electric machines detailed above, the following highlights the market and economic conditions which are driving the need for Kelly Tractor's expansion and the inadequacy of the existing headquarters to drive that growth and support the critical needs of the community. We also detail the need to build facilities which will allow CAT to support its ecosystem in South Florida, support critical needs of the Miami-Dade community, maintain its dominance over international quickly expanding competitors in the U.S. market, and highlight the severe constraints of the existing headquarter facility and land holding to support that growth.

As noted earlier, Kelly serves a 13-county region for CAT products from its 1971-era 50 acre functionally obsolete headquarters facility in Miami Dade, with the 50 acres bifurcated by a number of busy public rights-of-way. Currently, including offices and indoor space for parts, service, and other related functions the existing campus has approximately 376,000 square feet of indoor floor area when a catwalk mezzanine is accounted for in the parts warehouse. As the current March 2026 plan which has been submitted to the county indicates, the plan for the new campus in the near term is to build approximately 1.04 million square feet of modern dock height loading space with appropriate truck wells and climate control as necessary (2.78 times the amount of indoor space at the existing HQ facility) to accommodate growth in service, parts, storage, office, and training and consolidate components of regional operations[4] onto the single state-of-the-art campus. The current plan calls for a significant expansion of both indoor and outdoor space. To accommodate the 13 county region's customer base, Kelly also has eight (8) other facilities throughout the region with an additional 124.07 acres (175 +/- acres in total including the HQ in Miami). While some of the operation of these satellite facilities, for example service and repair and sales of smaller equipment such as forklifts, needs to be located close to the customer base, much of the fragmented nature of the Kelly operation sprawled across multiple counties has been driven by the size and logistical limitations of the headquarters facility and property. For example, storage and concurrent rehab/restoration of equipment, sales of heavy new and used equipment, and similar functions would be better coordinated and served out of an adequately built state-of-the-art single headquarters facility rather than spread across a massive region. Likewise, the response to natural disasters with generators and other heavy equipment and the company's central role in supporting the Everglades Restoration are better coordinated via the headquarters facility. Kelly already utilizes a small fleet of "night trucks" to move equipment across the region when traffic volumes are lowest and with the development of a modern facility on the new Kelly campus this nighttime routing will easily be expanded to serve the entire region from the no longer constrained operations at the new headquarters. Likewise, the ability to tie the headquarters campus to CSX rail will allow for the delivery of heavy equipment to and from the site without placing additional burden on the regional road network. Given expected changes over time in the ratio of indoor vs. outdoor space which includes the fast emergence of electrification of heavy equipment fleets and batteries which must be maintained and stored in climate controlled settings, Kelly's CDMP application requests approval for more built space than indicated on the site plan to accommodate the future needs of the industry.

Kelly Tractor & CAT – A Critical Community Resource

In addition to broad economic trends, further detailed below, that will support the development and expansion of the Kelly new headquarters campus in the planned location, Kelly is a critical community resource for a range of needs and industry, some of which may not be immediately obvious. There is a range of government support operations, industries, and billions of dollars in specific South Florida major infrastructure investments already underway or planned, which rely on partnerships with Kelly and CAT. These include the following:

Natural Disaster/Hurricane Recovery & Staging – Kelly is a central player in the immediate support and restoration efforts following natural disasters, particularly following hurricanes. The new headquarters property, with over 100 acres of paved open space, equipment washing stations, service support, and central west location with ready highway access will serve as a key hurricane recovery and restoration staging and service area for the entire county in the case of major storm events. As the distributor and lessor of CAT generators in the region through the Kelly's Pantropic subsidiary at any given time Pantropic has 100 generators with a combined 115 MW of generating capacity (equivalent to a small utility-scale or peaking-power powerplant) located in its facility in Miami-Dade. The company is positioned to immediately deploy generators to support critical community and safety functions such as hospitals, nursing homes, municipal buildings, etc. Indeed, approximately 90 percent of the health care network in

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[4] Although not smaller equipment sales and service function which still must be located closer to customers across the region.

South Florida that have generators have installed CAT generators to provide power during periods when utility power is unavailable. In major storms, and indicative of CAT's "DNA" for partnership relationship with customers, Kelly technicians are stationed at hospitals which run CAT generators during major storms so that if there is ever an issue with the generator systems, service response is immediate. Likewise, for extended outages, Kelly maintains its own fleet of fuel trucks with 2,500 gallon capacity each in order to provide fuel to customers who cannot or are having difficulty getting fuel deliveries to feed the generators following storms. Additionally, through the CAT distributor network, Kelly has an established protocol for leveraging the sister distributor network for hundreds of additional megawatt capacity within a 48-72 hour period following a storm. During the last major storm to impact Miami-Dade, Hurricane Irma in 2017, Kelly not only deployed all of its generators; deployment of heavy equipment in inventory at its headquarters, increased by more than 50 percent during the first 90 days following the storm. The additional indoor and outdoor space planned for the new Kelly Headquarters site will allow the company to significantly expand local inventory of the critical power and mechanized equipment necessary for post storm recovery and restoration.

Everglades Restoration Project (CERP) – The 25 year budget for CERP has grown from $7.8 billion to over $23 billion. Kelly is the key provider of construction equipment for the project and recently delivered 40 pieces of equipment to the most recent $1.0 billion phase of the project that will require double the amount of earth movement than during the construction of the Hoover Dam. Pantropic, the company's generator arm, has installed, maintains and services all of the pump station generators for the U.S Army Corps of Engineers associated with CERP. Kelly will continue to be the major equipment provider for the project through completion particularly with the Buy America provisions of CERP funding, and the western location of the new headquarters campus will allow the company to better access and serve the needs of the CERP.

Mining – The mining industry continues to be a major generator of economic activity in South Florida (particularly Miami-Dade, Lee, Palm Beach, and Charlotte counties) with substantial economic output and employment. The industry is almost exclusively dependent upon Kelly and CAT to provide and maintain equipment that cannot just be "brought into the shop" for regular maintenance and repairs given the fact that many of the pieces are larger than a single family home. Proximity to mining operations in Northwest Dade, Lee, and Palm Beach will be a key benefit of the new headquarters location.

Private Construction – Kelly continues to be the leading provider of large scale construction equipment to builders of privately funded buildings and facilities. Kelly had more than $333 million in average annual sales or rentals between 2023 and 2025 in construction equipment in South Florida. As the region grows consistent with the data presented below, the needs of the private sector construction market for new, used and rented equipment will expand as well. This is enhanced by the potential rail access for the proposed headquarters site which will allow for more efficient delivery of large equipment throughout the 13 county region which have difficultly being shipped due to size and weight on the county's road network.

Miami-Dade/FDOT Infrastructure Improvements – The $9.0 billion MIA Modernization in Action capital improvement effort, Port Miami capital program, FDOT's expansive improvement and repaving program in the County, and billions of dollars of WASD water and sewer improvements over the next few decades all will rely heavily on CAT equipment. As important, maintaining project schedules requires maintenance of equipment and ready access to service in a timely manner. The expanded facilities and staff at the new headquarters project will assure that the wait or downtime associated with repairs or maintenance of equipment will be minimized.

International Sales, Parts & Training – Although the Caribbean and Latin America are not part of the Kelly region, Kelly does maintain a robust market for the shipping of parts to the region and advanced training of skilled operators from the international region on new equipment. A new headquarter facility will allow for an expanded export market for parts and shipping, but has also been designed to serve as the main training center for the entire Caribbean basin. With flights, hotel nights, and ancillary expenditure, the training components of the state-of-the-art headquarters facility will be a major economic driver of inflow expenditure in the region, better tie international uses over the long term to CAT and Kelly, and serve as an important ancillary revenue driver for the company. This is especially the case in peak times of need such as following natural disasters (i.e. earthquakes, hurricanes) but also when major shift in governance occurs in major potential markets as is currently the case in Venezuela. Rich in natural resources, both in petroleum and rare earth minerals, and in need of broadscale infrastructure renewal following decades of disinvestment, companies are rushing to Venezuela to support the redevelopment of the country and support the restoration of the petroleum and mining industries, two sectors where CAT is a dominant and critical player. Given the lack of distribution network in Venezuela following decades of disinvestment, Kelly is already being positioned as a central player in supporting the rebuilding of Venezuelan industry and infrastructure for the foreseeable future providing the network support needed for equipment, parts, and training. The new campus will be central to quickly and efficiently fulfilling this need, and will position Kelly to continue as the leading secondary supplier for the Caribbean and Latin America regions well into future as those regions continue to evolve and closed markets liberalize.

Market & Economic Conditions Driving Need For Expansion

Although the new Kelly headquarters campus is planned for western Miami-Dade County, our evaluation of future growth focuses on the 13-county region which Kelly serves as the CAT distributor given that the headquarter campus and its operations are being built as a facility that will serve the entire region and not just Miami-Dade. Of note, within the 13 county region currently Miami-Dade, Broward, and Palm Beach counties combined account for 73 percent of the region's population, 77 percent of employment of the region and 71 percent of economic activity as measured by gross regional product. Over time there will be a modest downward shift in the ratio of population in the three large counties within the region given modest levels of available land for development in the largest counties compared to St. Lucie, Lee, or Indian River (as examples), but for the projection period within our analysis of 2060, the three counties are expected to actually grow in terms of economic activity with the three counties accounting for 79 percent of employment and 80 percent of gross regional product by 2060.

The following table compares the history between 1970 when the existing Kelly headquarters was built and 2024 vs. a projection between 2025 and 2060 of the key economic factors that research has indicated in some combination thereof are most likely to be predictors of future demand for construction and infrastructure investment. The history is provided and projections completed by Woods & Poole Economics at a county level. All dollar figures, historic and projected, are in adjusted real 2017 dollars so that inflation is not a factor in comparing trends over the long term projection period. Lambert has combined the county level data into the 13 county region for which Kelly serves as the exclusive CAT distributor.

	1970	2024	2025	2060	Avg Annual Change 1970-2024	Avg Annual Change 2025-2060
Total Population (,000)	**2,634.7**	**8,860.3**	**8,947.6**	**11,916.6**	**115.29**	**84.83**
Total Households (,000)	**908**	**3,508**	**3,557**	**4,790**	**48.15**	**35.23**
Total Employment (,000)	**1,212.1**	**6,131.2**	**6,216.9**	**10,142.8**	**91.09**	**112.17**
Total Earnings (million 2017 $)	**$43,949**	**$320,050**	**$327,481**	**$738,773**	**$5,112.98**	**$11,751.21**
Total Personal Income (millions 2017 $)	**$62,042**	**$608,663**	**$625,874**	**$1,400,112**	**$10,122.61**	**$22,121.07**
Personal Income per Capita (2017 $)	**$23,548**	**$68,695**	**$69,949**	**$117,493**	**$836.05**	**$1,358.40**
Gross Regional Product (million 2017 $)	**$69,462**	**$573,181**	**$586,906**	**$1,339,433**	**$9,328.13**	**$21,500.76**

Source: Woods & Poole Economics; Lambert Advisory

Figure 3: 13-County Region Total & Annual Average Growth - Primary Factors that Drive Demand for Construction Historic (1970-2024) and Projection (2025 to 2060)

What the table in Figure 3 above indicates is that while population and household growth will slow over the next 35 years in the region as the largest counties have decreasing amounts of land to support housing development, annual employment is expected to increase by nearly 20 percent and Earnings, Personal Income, and most importantly, Gross Regional Product which is the broadest measure of regional economic expansion will grow by more than double on an average annual basis than it did between 1970 and 2024. This substantial expansion of economic growth, significantly driven by inflow of capital, incomes, tourism and investment will drive new private construction, additional infrastructure investment, and related community facility expansion at a level not experienced in the past. For Kelly and CAT this significantly enhanced expansion will drive new levels of demand for construction equipment throughout the region and is indicative of the need for significantly expanded facilities to accommodate that demand. As the table above indicates, over the next 35 years Gross Regional Product in real terms (uninflated) is expected to grow by 2.3 times, total personal income by 2.2 times and earnings by 2.3 times. In that context, it appears entirely reasonable that Kelly is seeking to expand its indoor and outdoor footprint by 2.8 times in the near term particularly given that the expansion will allow the company to consolidate several functions around parts, sales and storage and restoration of equipment that is currently occurring in satellite locations throughout the region.

Maintain Presence & Dominance Over Global Competitors Locally

The graph below illustrates the Kelly Tractor's average annual sales broken down by category between 2023 and 2025. In sum, Kelly sales averaged more than a 1/2 billion dollars per year over the 2023 to 2025 period, nearly 50 percent of which were made in Miami-Dade County.

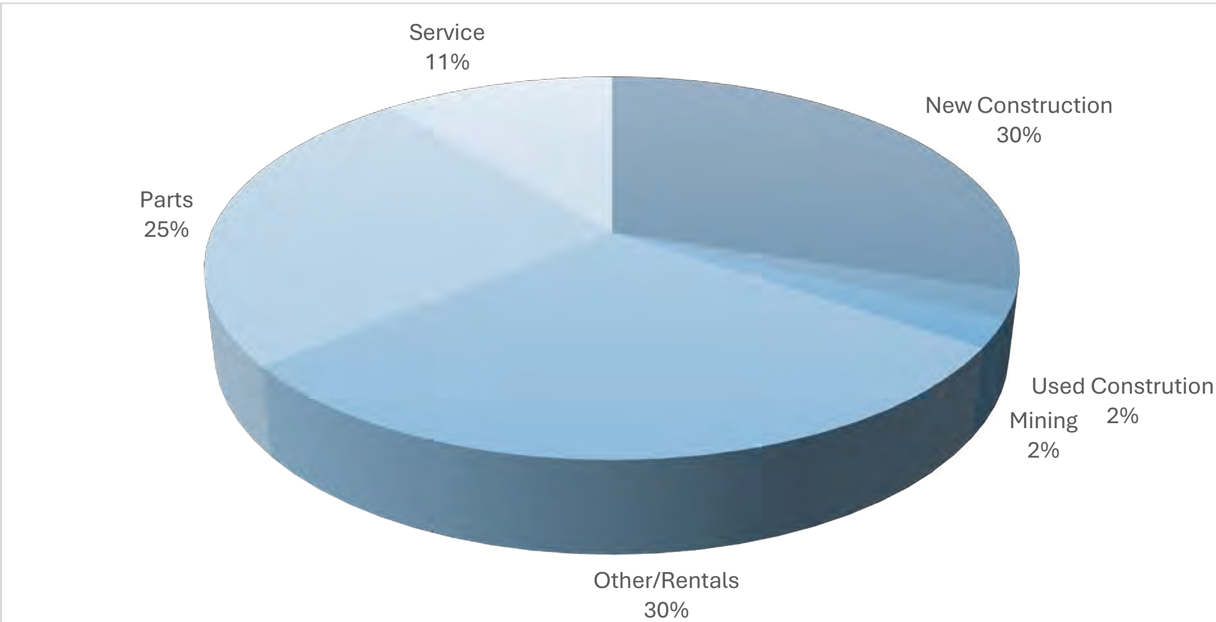

Figure 4: Kelly Tractor Average Annual Sales By Type (2023-2025)

Source: Kelly Tractor

In addition to the sales above associated with Kelly, Pantropic Power, a CAT generator subsidiary of Kelly, had an additional $100 million in sales in 2025 including parts, service, equipment, and rentals.

Between Pantropic and Kelly, total sales were in excess of $650 million a year during the past several years.

It is difficult to overstate how important Kelly and CAT are to the South Florida construction industry and infrastructure investment in general. Over the past 12 months, Kelly had 41 percent market share of the large scale Global Construction Infrastructure (GCI) equipment sold in the South Florida market and 37 percent in Miami Dade, by far the largest county in terms of sales in Kelly's 13-county region.

Kelly and CAT's dominance in South Florida is not because the competitors are not working the market or lazy. Komatsu, the second largest equipment manufacturer in the world, is constantly striving to catch up. XCMG and Sany, the leading Chinese manufactures while currently far behind in Florida market share, have established North American headquarters in neighboring Georgia and as with many Chinese manufacturing companies have an incredible ability to improve the quality of products over a few short years and deliver at lower costs. This will particularly be the case as the heavy construction equipment industry transitions from diesel to advanced battery technology, a particular strength among Chinese producers.

In order to continue to compete at the premier level and concurrently provide the high level of integrated services which set them apart for their customers and communities in which they operate, Kelly/CAT have made the determination that they need an expanded state-of-the-art campus which represents their brand values, strength, and can support their ecosystem model which includes ongoing partnership with customers well beyond sales and service to include training, storage, restoration, and life cycle management of equipment assets. All of those components can be found in the plan which Kelly has submitted to the County. The facilities are best-in-class and project the strength of the brand to the market dominance which Kelly and CAT have achieved. To expect Kelly and CAT to deliver all of these services from a functionally obsolete, 55-year-old facility bisected by public rights-of-way—with severe site constraints that limit their ability to serve customers at the standard those customers now demand—is simply not realistic.

The footprint proposed in the campus expansion reflects the operational needs of a full-service heavy equipment and power systems dealer serving a large regional market. In major U.S. growing markets, CAT is expecting regional distributors to establish campus like facilities which provide a wide array of co-located services and support for their partner contractors, from sales to service training to storage and rehabilitation to parts and more. The goal is a brand statement and enhanced level of customer service that will allow Caterpillar to continue to express its partnership DNA and continue to dominate over its quickly expanding and innovating Chinese competitors which are now focused on the U.S. market as a centerpiece of their global long term growth strategy.

For reference, there are several examples throughout the country of regional distributors who have built campuses that meet the current and looking forward brand and customer service objectives of CAT, provide for the full range of services and needs of customers and serve as models for what Kelly is seeking to achieve in Miami Dade County. These include the following.

Holt Caterpillar Headquarters - San Antonio, Texas

Holt has been in business for over 85 years and has a regional and international perspective on its future growth. The company recently developed a 140 plus acre state-of-the-art campus to serve its market and support the northern Mexico market for the next generation. The campus includes sales, parts distribution, storage, corporate headquarters building, service and other components located throughout the campus with significant room for expansion.

Figure 5: Holt Caterpillar 85,000 square foot HQ Building – San Antonio, TX

Figure 6: Holt Caterpillar HQ 140-acre Entrance – San Antonio, TX

Figure 7: Holt Caterpillar HQ 140-acre +/- Campus - San Antonio, TX

Ring Power Headquarters – St Augustine, Florida

Ring has been a Caterpillar dealer for over 60 years and is the regional distributor for North Florida. While the company has several smaller facilities scattered throughout north Florida, Ring principal operates out of its 85 net acre central campus in St Augustine that is the center point of the company's sales, major restoration/repair, training and corporate operations and is designed to support the entire North Florida network of facilities with parts and supplies for their customers.

Figure 8: Ring Power HQ Building – St. Augustine, FL

Figure 9: Ring Power HQ 85 Acre (Net) Campus – St. Augustine, FL

Figure 10: Ring Power Campus Modern Climate Controlled Supplies Warehouse – St Augustine, FL

Kelly's plan is to build the next generation of campus facility even beyond what Holt and Ring have created in San Antonio and North Florida to accommodate the important technological and powertrain advances which will allow the construction equipment business to evolve into the future.

Key operational components of Kelly's Plan include:

Indoor Parts & High Value Storage Warehousing
Current Facility: 132,000 square feet + "2nd floor" catwalk
New Campus: 368,000 square feet for parts and high value equipment storage

Large indoor storage facilities are required to maintain extensive parts inventories that support rapid service turnaround and minimize equipment downtime for customers. Caterpillar's dealer model emphasizes immediate parts availability and direct access to dealer inventory as critical components of customer support. Inventory breadth and indoor storage: A larger parts and equipment inventory reduces downtime for customers and supports faster repair cycles. Expanded indoor storage also protects high-value components from weather exposure and reduces loss/obsolescence risk.

Service and Maintenance Facilities
Current Facility: 47,000 square feet
New Campus: 282,000 square feet main plus 30,000 square feet satellite building for peak demand

Heavy equipment maintenance requires large service bays, overhead cranes, specialized tooling, and space for diagnostics, repair, rebuilding, and testing. The expansion program significantly increases service capacity to support a growing regional equipment fleet and reduces service turnaround times. Improving service capacity and turnaround time by having dedicated, expanded service buildings (including multiple service components) increase bay count, allow workflow separation (diagnostics, heavy maintenance, warranty work, and quick-turn repairs), and improve scheduling reliability during peak seasons. This nearly seven-times expansion of space also allows for the specialized service and replacement needs of battery operated equipment the key battery components of which will be stored in the service and matenance facilities rather than in the parts warehouse.

Covered Equipment Storage
Current Facility: 21,000 square feet
New Campus: 101,000 square feet

Covered storage protects high-value machinery, engines, and generators from weather exposure while allowing equipment to remain staged and ready for deployment.

Administrative and Training Facilities
Current Facility: 27,000 square feet office and training
New Campus: 150,000 square feet office plus 18,000 square feet training center

The proposed office and training components support workforce development, technician training programs, dispatch operations, and customer support services.

Caterpillar and other major equipment manufacturers emphasize the importance of dealer-based technical training and continuing education for technicians and operators. Dedicated training facilities therefore represent a necessary component of modern heavy equipment service campuses.

Truck/Heavy Equipment Sales & Rentals
Current Facility: 141,000 in non-climate controlled structures and outdoors areas
New Campus: 80,000 square feet climate controlled showrooms/retail plus outdoor areas

Architecturally designed customer oriented sales showrooms that serve to showcase the latest innovations in equipment and products. This is anticipated to include areas for ancillary commercial sales of CAT branded merchandise as well as food and beverage service for both customers and staff.

Forklifts
Current Facility: 23,000 indoor service plus outdoor storage
New Campus: 117,000 indoor service and storage

Transition from outdoor to indoor space to store and service battery vs. gas fueled forklifts.

Outdoor Training, Demonstration, Storage and Staging Areas
New Campus: 20 acres not including over 580 spaces for truck parking and storage

The outdoor areas shown on the Conceptual Site Plan are not passive land uses. Rather, they function as essential operational components of the campus. Outdoor operational areas support:

1. Equipment storage and display
2. Fleet staging and dispatch preparation
3. Truck and trailer circulation and transloading
4. Demonstration and training activities
5. Equipment inspections and testing

Heavy construction equipment requires significant maneuvering and staging space due to the size and operational characteristics of the machinery. Adequate outdoor yard areas are therefore necessary to maintain safe circulation patterns, separate customer traffic from operational zones, and allow for efficient fleet management. The Conceptual Site Plan provides these operational yards while also maintaining designated stormwater management areas and preserved environmental features.

Needs Analysis II :Traditional Needs Assessment for Land to Support Industrial Development

Lambert Advisory has completed a Need Analysis associated with the Kelly Tractor proposed expansion plan (Kelly expansion). Specifically, Kelly Tractor is seeking to relocate and expand its headquarters within a 247 +/- acre site located at NW 137th Avenue and the Dolphin Expressway. The plan generally includes but is not limited to: indoor storage and facilities for sales, training and administrative operations; more than 500 truck parking spaces; gas pumps and maintenance areas; and large outdoor covered and uncovered equipment storage areas.

The proposed expansion is integral to the growth and competitiveness of one of the largest and most recognized Caterpillar equipment dealerships in Florida and necessary to maintain Kelly's presence and job support for residents of Miami Dade County.

Relevance of Policy and Specific Need

The Needs Analysis herein is intently focused on the industrial land use sector. Policy LU-8E of the Comprehensive Development Master Plan ("CDMP") provides that amendments to the CDMP Land Use Plan map must satisfy a "deficiency in the . . . map to accommodate projected population or economic growth of the County."

Adequacy of non-residential uses "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 testing of the adequacy of capacity for non-residential uses depends on the nature of the use. For larger commercial uses and all industrial uses, the capacity of "Tiers, Half-Tiers and combinations thereof" will be considered, along with countywide supply." For "neighborhood- and community-oriented business and office uses," which are intended to serve a smaller area, adequacy of capacity will be "determined on the basis of localized subarea geography such as Census Tracts, Minor Statistical Areas (MSAs) and combinations thereof."

The needs assessment herein follows a previous needs analysis prepared by Miami Economic Associates (MEA) in August of 2024 and further information to back up the needs analysis as part of a letter prepared by MEA in July 2025. Those letters, along with the County's response and feedback, have been thoroughly reviewed and the analysis herein is mindful of the County's input and concerns. While there are elements of the analysis completed within the previous application that we consider to be standard procedures for evaluating supply and demand conditions underlying the determination of "Need," this updated assessment considers findings as of April 2026 and additional metrics that will provide supplementary support the evaluation of the current application.

There are two distinct components to the Kelly Tractor Needs Analysis: first, is a discussion of the broader industrial market conditions within Miami Dade County and, specifically, the relatively dire constraint on industrial land supply that not only directly affects the proposed Kelly Tractor expansion plan, but also the sustainability and growth of the broader industrial sector that is absolutely critical to Miami Dade County's economy; and, second, an in-depth evaluation of industrial land conditions and limitations in and around the Kelly Tractor expansion site (local area conditions) that must be considered in the overall needs assessment.

Broader Industrial Market Conditions

The industrial real estate market in Miami–Dade County is among the most active industrial/distribution markets in the US. It is widely viewed by leading US industrial development, brokerage and industry professional to be a top performer as it relates to occupancy stability and rental rate growth during the past several years.

The County's industrial development sector is not far removed from record breaking levels of addition to supply with 6.5 million square feet of space delivered in 2024 alone. Despite such a large amount of space being added to the market, occupancy remained in the 95 percent range and rental rates remain at levels that are among the top 10 markets in the US.[5] By year-end 2025, concerns among some industry representatives that were raised about overall stability and longevity have been abated considering that there is roughly 4.0 million square feet of space currently under-construction and future forecast for demand remains strong.

Suffice it to say that economic and real estate markets naturally ebb and flow over long periods of time. However, there is limited evidence, if any, that the long-term growth prospects for Miami Dade County's industrial market sector would significantly moderate from trends that have been building over the past 20 years. With continued regional population and investment growth, as well as projected significant increased cargo throughput at both Port Miami (through 2035) and MIA (through 2040), the biggest threat to the industrial market is that there is little available high quality functional industrial land Countywide to support this growth in the future.

There are numerous development trends and conditions that indicate the need for significant additional land to support sustainable industrial growth in Miami Dade County particularly within the central planning tiers.

The following provides an overview and summary finding of several key factors supporting the need for broader industry sector growth:

Industrial Building Footprints Continue to Expand

Industrial buildings across the United States have grown dramatically in scale over the past decade, and the trend shows no signs of slowing. This expansion is being driven by powerful structural forces: the surge in high-tech manufacturing projects and automation in distribution which have allowed larger and taller distribution buildings to be operated more efficiently. Likewise, there has been a strategic shift among developers toward larger assets that deliver stronger returns. The continued rise of e-commerce has only intensified demand for large fulfillment and distribution centers, accelerating this shift nationwide.

CoStar data clearly illustrates this transformation. Across the U.S., the average size of industrial buildings delivered in the past 10 years has increased steadily at the national, state, and county levels. Miami-Dade County specifically is similarly experiencing an increase in size of new industrial buildings. For years, the average newly built industrial building in the county remained below 120,000 square feet. That changed notably beginning in 2021. By 2022, the average new building size averaged above 180,000 square feet, moderating to roughly 142,000 square feet in 2025.

[5] Cushman & Wakefield: Market Beats US Industrial (Q3 2025)

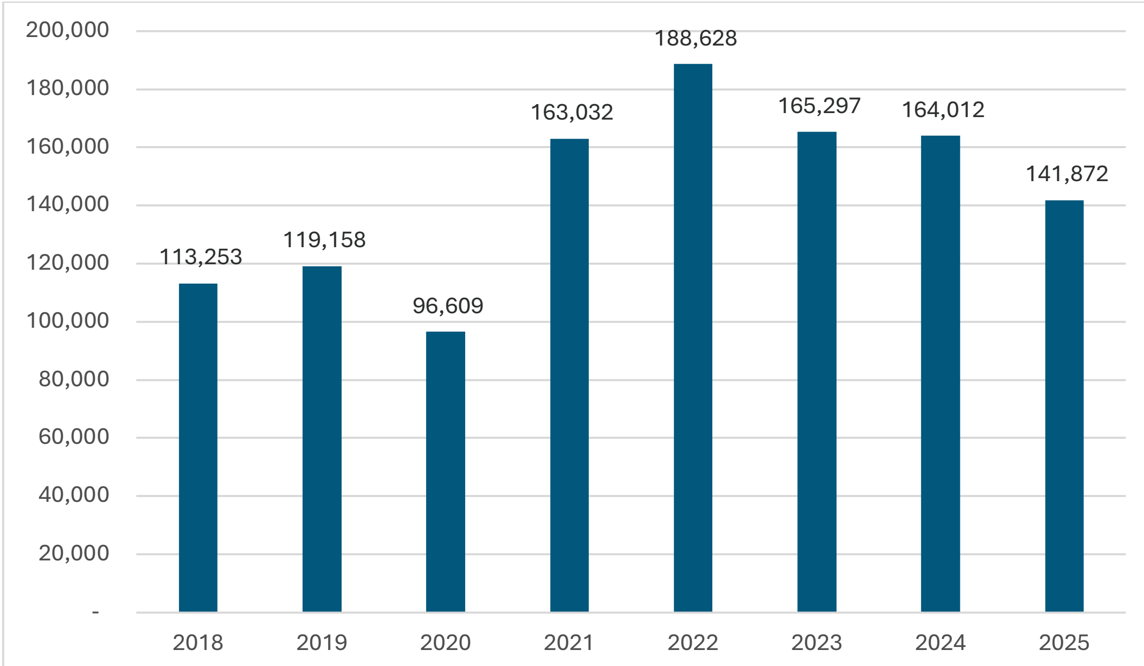

Figure 11: Average Industrial Building Size (Square Feet) in Building Built in Past 10 Years Miami Dade County (*Source: Costar)*

The average industrial building built over the past 10 years was nearly 132,000 square feet in size Comparatively, the average industrial building size in the decade prior was 46,200 square feet. This trend is unlikely to change. According to Costar, there are 24 industrial buildings currently under-construction in Miami Dade County, with an average building size of **169,000 square feet**—a clear break from historical norms.

But more compelling evidence lies in the distribution of new supply. Of the 43± million square feet of industrial space built in Miami-Dade during in the past decade, 38± million square feet—85+% of all new inventory was delivered in buildings larger than 120,000 square feet. Even by building count, more than half of all new industrial properties exceeded this threshold.

While there is no question that there will be continued demand for small-bay industrial product developed for niche uses such as auto repair, localized storage, and small-scale manufacturing, it now represents a marginal component of the county's total industrial deliveries. The market has shifted toward large, modern, high-capacity facilities; aligning Miami-Dade with national trends and positioning it as a leading hub for large-format industrial development.

Miami Dade County – Industrial Development Trends and Future Demand Remains Strong

Following is a highlight of historical industrial development trends in Miami Dade County, along with key demand factors impacting development during the next 10 to 15+ years based upon Costar data:

- In Miami Dade County, there has been 43.7 million square feet of industrial space built in the past 10 years, an average annual addition to industrial supply of nearly 4.4 million square feet.

- In 2025 alone, the County added 3.3 million square feet of industrial space in 23 buildings (averaging more than 143,000 square feet per building). This follows the addition of 6.4 million square feet in 2024 — the highest level of addition-to-supply in County history. Though 2025 marked a modest slowdown in development pace from years prior, there is currently 4.0 million square feet of industrial space currently under-construction in Miami Dade County, the vast majority of which is anticipated to be delivered by the end of 2026. These new developments are averaging 169,000 square feet per building.
- Despite the extraordinary addition to the industrial stock in 2024, vacancy rates are just above 6.0 percent. Accordingly, total leasing activity for 2025 reached 16.2 million square feet which is far and above the 11.5 million square feet of leasing activity in all of 2024.
- In the 5-years prior to the pandemic, average rental rates increased from $8.62 per square foot to $10.70 per square foot (NNN), or an average annual growth rate of 4.4 percent. From 2021 to end-of-year 2025, rents increased from $11.65 per square foot to $16.40 per square foot (NNN), or an average annual growth rate of more than 8.9 percent. Rental rates did reach more than $17 per square foot at the end of 2023, before dropping to $16.11 at the end of 2024 as the market added unprecedented amounts of supply. Overall, however, rental rate trends are clearly positive over the near to mid-term particularly in light of the land constraints to accommodate new modern industrial development.

In terms of future industrial development outlook, industrial and distribution employment is forecast to remain relatively strong during the foreseeable future albeit more moderate than previous periods. Costar (jointly with Oxford Economics) prepares estimates of industrial sector job growth and additions to industrial supply over a 10-year forecast period. Key findings indicate:

- At year-end 2025, the County's industrial sector employment is 110,527 and forecast to increase by 7,863 total industrial sector jobs over the next 10 years; or 0.8 percent average annually; and,
- Costar's forecast for new industrial supply indicates an increase of 29.4 million square feet over the next 10 years, which equates to an average 2.9 million square feet per annum on average (an average of 1.1+ percent annual growth rate).

Recent Industrial Land Conditions Assessment prepared by Miami Dade County

In July 2025, Miami Dade County Regulatory and Economic Resource's Department (RER), RER published its *Projected Absorption of Industrial Land* analysis (referred to herein as RER 2025 analysis). At that time, less than 10 months ago, the RER 2025 analysis indicated that there was 1,245 acres of vacant industrial land remaining in all of Miami Dade County. Accordingly, the County projected that 145 acres would be absorbed annually on average through 2040. As a result, RER indicated that the entire inventory of vacant industrial land in the County would be depleted by 2033.

The County's evaluation of industrial land absorption in July 2025 does not even closely match recent historical absorption and development trends, or future demand as outlined in the Section above. This considers the fact that if an industry standard metric of 35 percent building-to-land coverage is utilized to convert historical and/or future industrial space demand to land utilization, under the County's absorption of 145 acres per year total industrial building development would average 2.2 million square feet per annum. This is nearly one-half of the more than 4 million square feet each year on average built during the past 10 years; and, also, well below the average annual 2.9 million square feet forecast by Costar over the next 10 years. Even if the coverage ratio is increased to 40 percent (which is considered to be aggressive in light of the many smaller industrial properties that remain vacant), the County's build-out pace would be 2.5 million square feet per annum which is still well below historical and forecast trends noted above. Considering either one of the more realistic and applicable forecasts applies to the RER 2025 analysis, industrial land absorption is more likely to be between roughly 165 and 185 acres per year which means land depletion between 2030 and 2032,well below the 10-year availability horizon required by LU8-F.

At the broader level, this unquestionably has significant implications for Miami Dade County's industrial sector, which is vital to the region's economic growth and, critically, to the businesses such as Kelly Tractors which, as the following sections of this memorandum indicate, are significantly land constrained as it relates to their business model and growth.

Assessment of Localized Industrial Market Conditions

An important component to the needs analysis for Kelly Tractor new headquarters site is an in-depth evaluation of industrial land conditions and availability of land within the UDB which could support industrial development or lack thereof within the Tier and MSA (3.2) in which the property is located. The analysis starts with the County's own datasets including:

Land Use: Existing land use within Miami-Dade County (LUMA);

Future Land Use: Comprehensive Development Master Plan (CDMP) Land Use Plan map designations of Miami-Dade County;

TIERS and MSA: Boundaries for North Central Planning Tier (NCPT) and MSA 3.2; and,

Parcel Data: Property ownership boundaries as defined by legal descriptions and deeds throughout Miami-Dade County.

In accordance with the "Industrial and Office" designation within the CDMP Future Land Use Map, the NCPT includes a total 10,536 acres of industrial designated land (built and vacant). Based upon RER's LUMA aerial and development reviews and associated classifications, the County identifies properties (not necessarily by folio number) that the County considered "potentially vacant" including categories such as: fallow land, pasture, truck parking/junk yards, non-protected privately owned vacant land, and certain other agricultural uses, among others.

After excluding incompatible uses such as parks, protected lands, government-owned vacant land, cemeteries, and conservation areas, in April of 2026 RER indicated that there is **1,136 acres** of potentially vacant land inside the UDB that could support industrial development across the entire NCPT and summarized in the table below.

Summary of LUMA Land Use - Overlap with CDMP Industrial and Office Designation		
Description	**Acreage**	***% of Total***
Other Agriculture (Exotic Birds, Monkeys, Research Facilities)	232.3	*20.4%*
Fallow	6.2	*0.5%*
Pasture (Grazing, Animal Farming, Dairy Farms and Animal Feed Lots)	176.2	*15.5%*
Vacant, Non-Protected, Privately-Owned	685.0	*60.4%*
Junk Yard	35.8	*3.2%*
RER Indicated Potentially Vacant Lands Total	**1,135.5**	***100%***

Figure 12

Source: RER LUMA GIS Database; April 2026

It should be noted that the staff recommendation for denial indicates that 783 +/- acres of land appropriate for industrial exists in the North Central Planning Tier, most of which is in the MSA, 3.2 where the applicant's site is located. How RER identified 353 additional acres of available land for industrial development in the Tier during the past several months is not clear, but it appears from the County's most current database this is exactly what has occurred.

In any event, a closer examination of properties actually available for development within the UDB makes it very clear that there is dramatically less than 1,136 or even 783 acres available for industrial development inside the UDB.

When the acreage is broken down by MSA, the imbalance becomes quite apparent in that MSA 3.2 alone (and the area in which the applicant site is located) contains 89 percent of all RER designated vacant industrial land; or over 1,010 acres. No other MSA comprises more than 36 acres - shown in the following table.

Minor Statistical Area	CDMP Industrial Built & Vacant (Acres)	RER LUMA Identified Vacant (Acres)
1.3	21.1	3.7
3.2	**8,492.6**	**1,010.1**
4.1	233.5	6.9
4.2	719.0	27.8
4.3	365.8	1.1
4.4	0.00	0.0
4.5	274.7	21.7
4.6	121.2	35.7
4.7	247.0	28.3
5.1	61.3	0.00
Total:	**10,536.4**	**1,135.5**

Figure 13: Source - RER LUMA GIS Database; April 2026

However, within MSA 3.2, upon further evaluation, the apparent supply decreases significantly as a significant portion of the "vacant" land is not actually developable or is outside the UDB. Approximately 319 acres are already under development, and another 271 acres actually lie outside the UDB, making them unavailable for urban industrial use. This non-developable area combined represents 590 acres as follows and referenced in Exhibit 3 in the Appendix.

Under-developed/ Outside UDB	Land Use Description	Acreage
Under Development	Pasture (Grazing, Animal Farming, Dairy Farms and Animal Feed Lots)	176.2
	Vacant, Non-Protected, Privately-Owned	143.2
	Development Sub-total:	**319.5**
Outside UDB	Agriculture, Other (Exotic Birds, Monkeys, Research Facilities) *	232.4
	Vacant, Non-Protected, Privately-Owned	38.4
	Outside UDB Sub-total:	**270.8**
	Incompatible LUMA Total:	**590.3**

**Acreage associated with existing agricultural use of Kelly Tractor CDMP Property*

Figure 14

Once this combined 590 acres is removed, the remaining potentially developable vacant land drops to 420 acres (1,010 RER MSA 3.2 acres – 590 MSA 3.2 incompatible acres = 420 acres; see Exhibit 4 in Appendix).

However, it is important to note that 115 acres of the 420 comprises standalone and/or contiguous parcels that are less than 5 acres which is considered to be an absolute minimum parcel area to accommodate modern industrial space[6]. Therefore, there is actually **305 acres** of effective and usable vacant industrial land in MSA 3.2.

Based upon the County's own industrial land absorption estimate of 57 acres per annum on average for MSA 3.2 as set forth in the within the *RER 2025 analysis* noted in previous sections, there is only 5± years of industrial land available which does not even take into consideration that the County's absorption of industrial land Countywide is significantly understated based upon the most recent industry trends and projections.

[6] 5 acres minimum is being extraordinarily liberal. At 5 acres and 40% building coverage, a building of only 87,000 square feet can be built which is just over half of the average size industrial building being built in the County today.

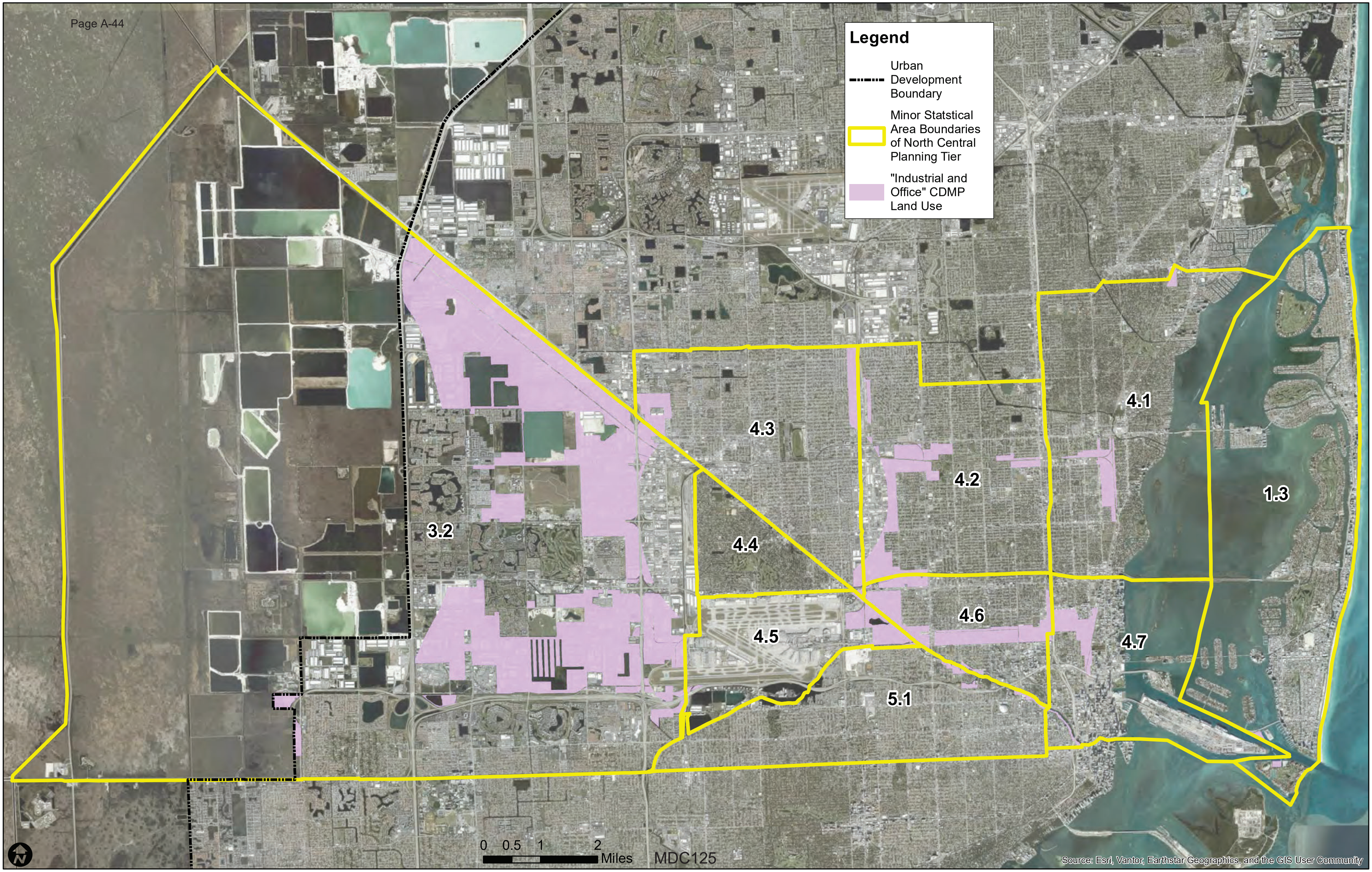

Exhibit 1: CDMP "Industrial and Office" within North Central Planning Tier

EAS Engineering, Inc.

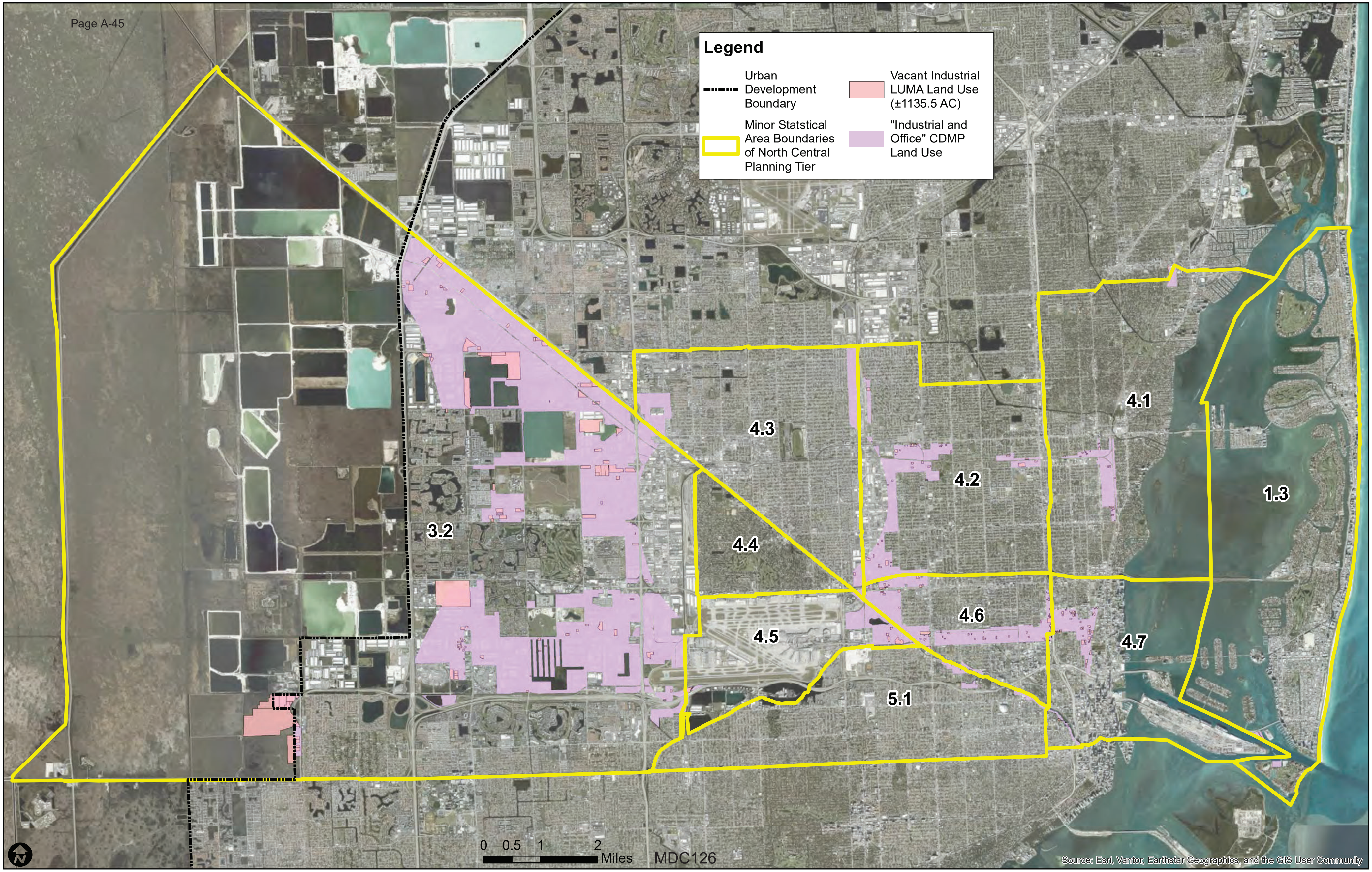

Exhibit 2: Vacant LUMA Land Use Overlay with CDMP "Industrial and Office" - North Central Planning Tier

EAS Engineering, Inc.

Land Use Condition	Land Use Description	Acreage
Under Development	Pasture (Grazing, Animal Farming, Dairy Farms and Animal Feed Lots)	176.3
	Vacant, Non-Protected, Privately-Owned	143.2
	Under Development Sub-total:	**319.5**
Outside UDB	Agriculture, Other (Exotic Birds, Monkeys, Research Facilities)*	232.4
	Vacant, Non-Protected, Privately-Owned	38.4
	Outside UDB Sub-total:	**270.8**
	LUMA Outside UDB/Under Development Total:	**590.3**

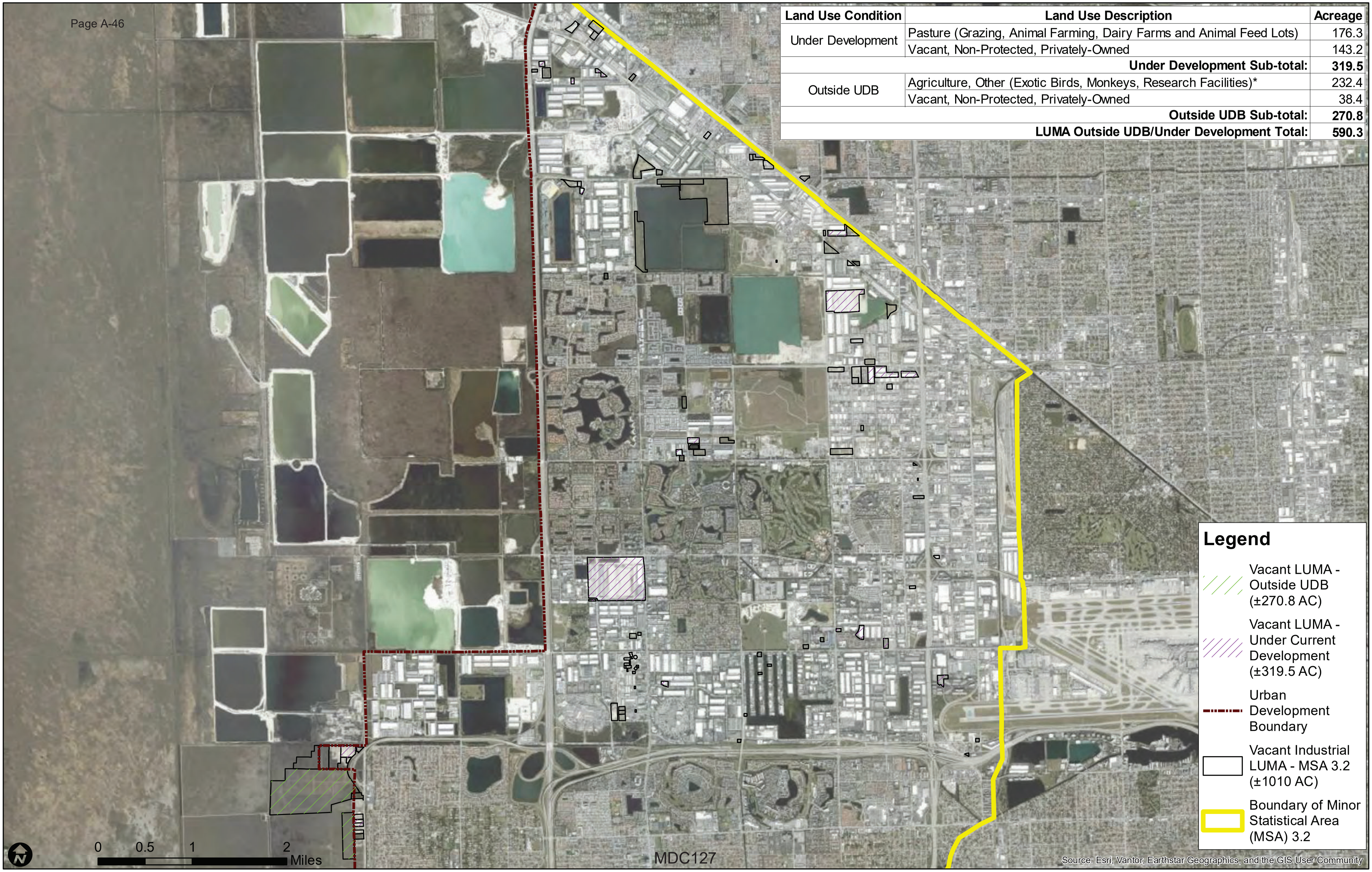

Exhibit 3: Vacant LUMA Outside UDB or Under Development - Minor Statistical Area 3.2

EAS Engineering, Inc.

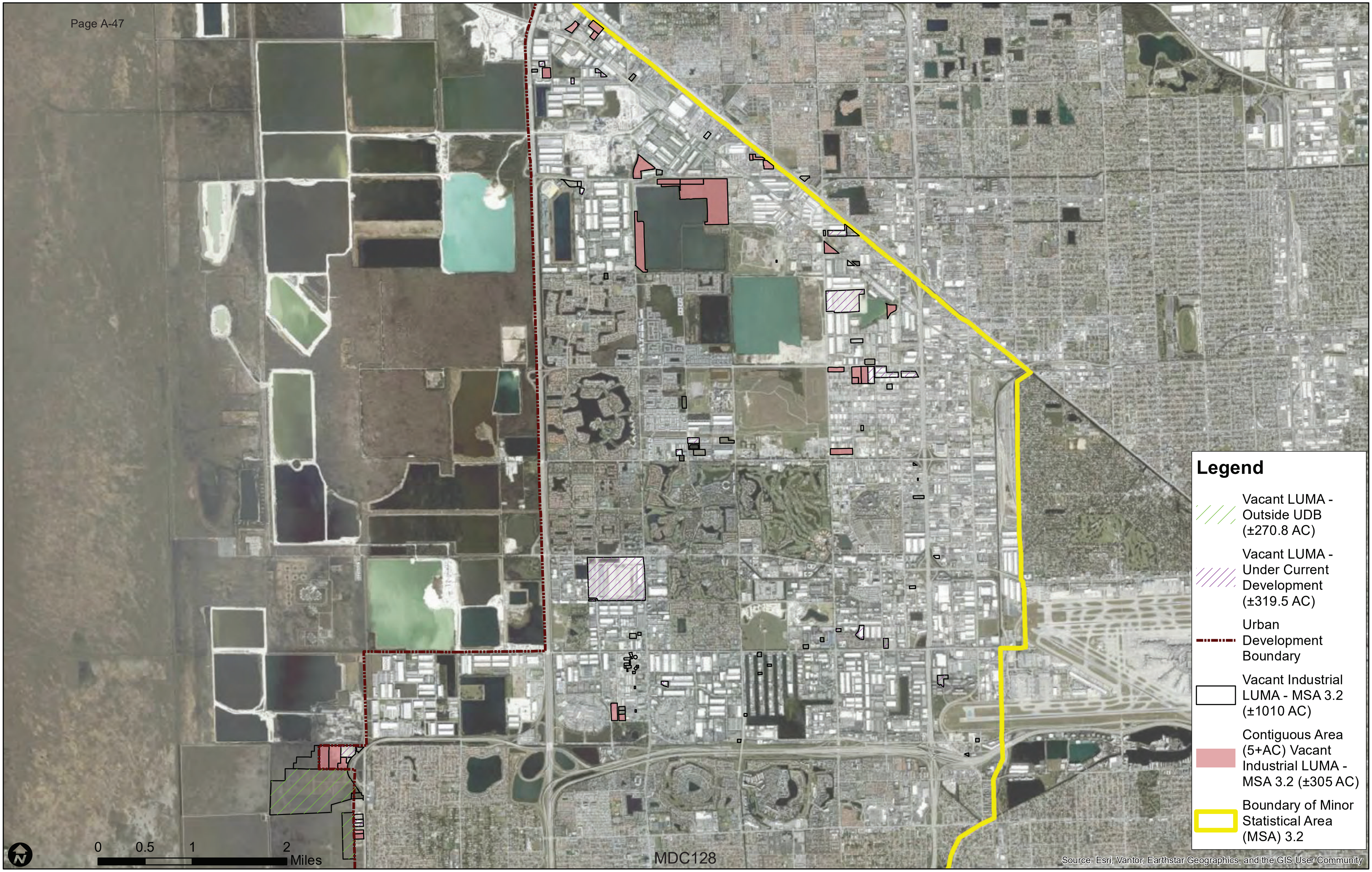

Exhibit 4: Contiguous Areas (5+acres) of Vacant Industrial LUMA - Minor Statistical Area 3.2

EAS Engineering, Inc.

Lambert

ADVISORY

Received 7/13/26
RER-Planning

CDMP20230013
Kelly Tractor

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July 10, 2026

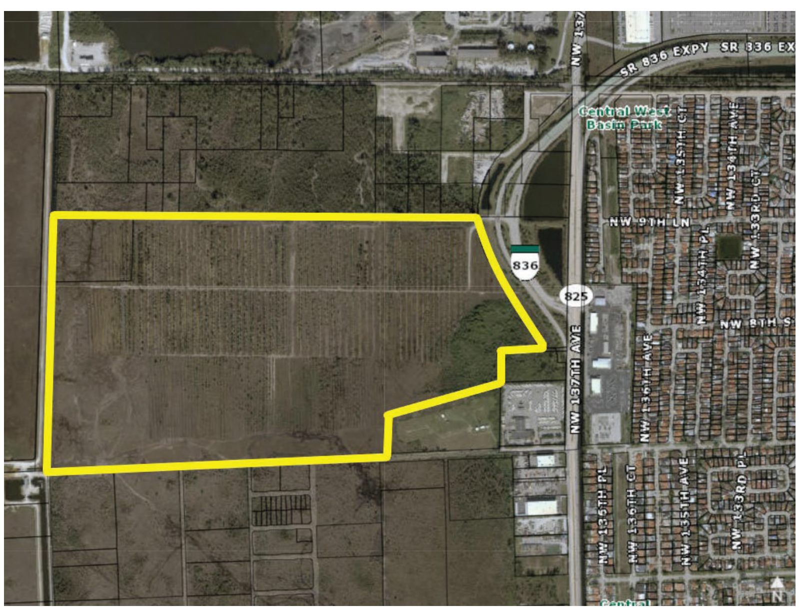
VIA ENERGOV PORTAL

Mr. Jerry Bell, AICP
Assistant Director
Department of Regulatory and Economic Resources
111 NW First Street, 12th Floor
Miami, Florida 33131

Re: Kelly Tractor Co. / CDMP20230013 / Revision to Comprehensive Development Master Plan ("CDMP") Amendment Application

Dear Mr. Bell:

As you are aware, this Firm represents Kelly Tractor Co. in connection with the above referenced CDMP amendment application (the "Amendment Application") for those parcels of land consisting of ± 246.07 acres generally located north of NW 6th Street and west of NW 137 Avenue and State Road 836, in unincorporated Miami-Dade County and are identified by the Miami-Dade County Property Appraiser by Folio Nos. 30-3953-000-0130 and 30-3953-000-0138 (the "Property"). The boundaries of the Property are depicted in yellow on the aerial below:



I. The Revised Proposed Text Amendment

Given the recent delay in processing the Amendment Application, the Applicant is requesting to revise the deadline to develop land development regulations to permit the uses contemplated in the MIA Equipment and Supportive Services Area from 2028 to 2029. The requested change would allow the Applicant and the Department of Regulatory and Economic Resources ("RER") Zoning Division sufficient time to process the necessary changes to the land development regulations and proceed through the required public hearing process. As such, the revised Amendment Application is seeking the following change:

TO:

> By ~~2026~~ >>2029<<, unless otherwise extended by the Board of County Commissioners, Miami-Dade County shall develop land development regulations to permit the uses contemplated in the MIA Equipment and Supportive Services Area. The MIA Equipment and Supportive Services Area will be developed in a manner that generally conforms with the following development criteria ("Development Criteria"):

We respectfully request your favorable review and consideration of the revised Amendment Application. Thank you in advance for your considerate attention to this matter. Please let me know if you have any questions or require additional information.

Sincerely,

HOLLAND & KNIGHT LLP

Alessandria San Roman

CC: Ms. Lourdes Gomez, AICP
Mr. Garett Rowe
Mr. Alexander Dambach
Joseph G. Goldstein, Esq.
Juan J. Mayol, Jr., Esq.