



STATE OF FLORIDA
DEPARTMENT OF COMMUNITY AFFAIRS

"Dedicated to making Florida a better place to call home"

CHARLIE CRIST
Governor

THOMAS G. PELHAM
Secretary

MEMORANDUM

TO: Jim Quinn, DEP
Susan Harp, DOS
Wendy Evans, AG
Mary Ann Poole, FWC
Gary Donn, FDOT 6
Carolyn Dekle, South Florida RPC
P.K. Sharma, South Florida WMD

Date: October 12, 2007

Subject: Proposed Comprehensive Plan Amendment Review Objections,
Recommendations and Comments Reports

Enclosed are the Departments Objection, Recommendations and Comments Reports on the proposed amendments to the comprehensive plan(s) from the following local government(s):

Miami Dade 07D1

These reports are provided for your information and agency files. Following the adoption of the amendments by the local governments and subsequent compliance review to be conducted by this agency, we will forward copies of the Notices of Intent published by each local government plan.

If you have any questions, please contact Mr. Ray Eubanks at Suncom 278-4925 or (850) 488-4925.

RE/lp

Enclosure

2555 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-2100
Phone: 850.488.8466/Suncom 278.8466 FAX: 850.921.0781/Suncom 291.0781
Internet address: <http://www.dca.state.fl.us>



STATE OF FLORIDA
DEPARTMENT OF COMMUNITY AFFAIRS

"Dedicated to making Florida a better place to call home"

CHARLIE CRIST
Governor

THOMAS G. PELHAM
Secretary

October 12, 2007

The Honorable Carlos Alvarez
Mayor, Miami-Dade County
1110 Stephen P. Clark Center
111 NW 1 Street
Miami, Florida 33128-1972

Dear Mayor Alvarez:

The Department has completed its review of the Miami-Dade County proposed Comprehensive Plan Amendment (DCA No. 07D-1), which was received on August 14, 2007. Copies of the proposed amendment have been distributed to appropriate state, regional, and local agencies for their review and their comments are enclosed.

The Department has reviewed the comprehensive plan amendment for consistency with Rule 9J-5, Florida Administrative Code and Chapter 163, Part II, Florida Statutes and has prepared the attached Objections, Recommendations, and Comments Report which outlines our findings concerning the comprehensive plan amendment.

The Department has identified two objections and no comments. The issues of concern are the lack of intensity standards for the new land use category "Miami Metrozoo Entertainment Area" and the need to address traffic impacts.

2555 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-2100
Phone: 850.488.8466/Suncom 278.8466 FAX: 850.921.0781/Suncom 291.0781
Internet address: <http://www.dca.state.fl.us>

CRITICAL STATE CONCERN FIELD OFFICE
2796 Overseas Highway, Suite 212
Marathon, FL 33050-2227
(305) 289-2402

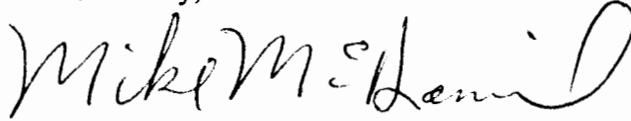
COMMUNITY PLANNING
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
(850) 488-2356

HOUSING & COMMUNITY DEVELOPMENT
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
(850) 488-7956

The Honorable Carlos Alvarez
October 12, 2007
Page 2

My staff and I are available to assist the County in addressing the issues identified in our report. If you have any questions, please contact Erin Boyington, Planner, at (850) 921-3762.

Sincerely,



Mike McDaniel, Chief
Office of Comprehensive Planning



MM/eb

Enclosures: Objections, Recommendations and Comments Report
 Review Agency Comments

cc: George M. Burgess, County Manager, Miami-Dade County
 Mr. Patrick F. Moore, CDMP Administrator, Miami-Dade County Department of
 Planning and Zoning
 Ms. Carolyn A. Dekle Executive Director, South Florida Regional Planning Council

DEPARTMENT OF COMMUNITY AFFAIRS
OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT
FOR
MIAMI-DADE COUNTY
AMENDMENT 07D-1

October 12, 2007
Division of Community Planning

This report is prepared pursuant to Rule 9J-11.010, F.A.C.

INTRODUCTION

The following Objections, Recommendations and Comments Report is based upon the Department's review of the Miami-Dade County 07D-1 proposed amendment to the Comprehensive Plan pursuant to § 163.3184, Florida Statutes (F.S.).

Any objections discussed relate to specific requirements of relevant portions of Chapter 9J-5, Florida Administrative Code (F.A.C.), and Chapter 163, Part II, F.S. Each objection includes a recommendation of one approach that might be taken to address the cited objection. Other approaches may be more suitable in specific situations. Some of these objections may have initially been raised by one of the other external review agencies. If there is a difference between the Department's objection and the external agency advisory objection or comment, the Department's objection would take precedence.

Each objection must be addressed by the County and corrected prior to the amendment being resubmitted for the Department's compliance review. Objections that are not addressed may result in a determination that the amendment is not in compliance. The Department may have raised an objection regarding missing data and analysis items, which the local government may consider not applicable to its amendment. If that is the case, a statement justifying the local government's non-applicability pursuant to Rule 9J-5.002(2), F.A.C., must be submitted. The Department will make a determination on the non-applicability of the requirement, and if the justification is sufficient, the objection will be considered addressed.

The comments that follow the objections and recommendations section are advisory in nature. Comments will not form bases of a determination of non-compliance. They are included to call attention to items raised by the Department's reviewers. The comments can be substantive, concerning planning principles, methodology or logic, as well as editorial in nature dealing with grammar, organization, mapping, and reader comprehension.

Appended to the back of the Department's report are the comment letters from the other state review agencies and other agencies, organizations, and individuals. These comments are advisory to the Department and may not form bases of Departmental objections unless they appear under the "Objections" heading in this report.

TRANSMITTAL PROCEDURES

Upon receipt of this letter, the Miami-Dade County has 60 days in which to adopt, adopt with changes, or determine that the County will not adopt the proposed amendment. The process for adoption of local government comprehensive plan amendments is outlined in s. 163.3184, F.S., and Rule 9J-11.011, F.A.C. The County must ensure that all ordinances adopting comprehensive plan amendments are consistent with the provisions of Chapter 163.3189(2)(a), F.S.

Within ten working days of the date of adoption, the County must submit the following to the Department:

Three copies of the adopted comprehensive plan amendments;

A listing of additional changes not previously reviewed;

A listing of findings by the local governing body, if any, which were not included in the ordinance; and

A statement indicating the relationship of the additional changes to the Department's Objections, Recommendations and Comments Report.

The above amendment and documentation are required for the Department to conduct a compliance review, make a compliance determination and issue the appropriate notice of intent.

In order to expedite the regional planning council's review of the amendments, and pursuant to Rule 9J-11.011(5), F.A.C., please provide a copy of the adopted amendment directly to the Executive Director of the South Florida Regional Planning Council.

Please be advised that Section 163.3184(8)(c), F.S., requires the Department to provide a courtesy information statement regarding the Department's Notice of Intent to citizens who furnish their names and addresses at the local government's plan amendment transmittal (proposed) or adoption hearings. In order to provide this courtesy information statement, local governments are required by law to furnish the names and addresses of the citizens requesting this information to the Department. **Please provide these required names and addresses to the Department when you transmit your adopted amendment package for compliance review. In the event there are no citizens requesting this information, please inform us of this as well.** For efficiency, we encourage that the information sheet be provided in electronic format.

OBJECTIONS, RECOMMENDATIONS AND COMMENTS REPORT

PROPOSED COMPREHENSIVE PLAN AMENDMENT

MIAMI-DADE COUNTY (DCA No. 07D-1)

I. CONSISTENCY WITH RULE 9J-5, F.A.C. AND CHAPTER 163, F.S.

The Department has completed its review of the proposed amendment to the Comprehensive Plan of Miami-Dade County (DCA No. 07D-1). The Department has the following objections:

A. Land Use Element

Objection 1: The addition of the new land use category “Miami Metrozoo Entertainment Area” and text to the Land Use Element under the section titled Interpretation of the Land Use Plan Map following the Park and Recreation category needs to include the intensity standards for the area that will be designated Miami Metrozoo Entertainment Area.

The text changes allows for a range of primary uses in the Miami Metrozoo Entertainment Area to include one or more of the following: “water parks and attractions, family entertainment center, hotels or other lodging, museums, and parks or open spaces. Certain other activities such as theme-related retail concessions, food and beverage establishments, administrative offices, and passenger transportation facilities that are supportive of the primary uses may also be considered for approval in the Miami Metrozoo Entertainment Area category.”

[Section 163.3177(6)(a) F.S.; Section 163.3177(8) F.S.; Rule 9J-5.005(2), F.A.C.; Rule 9J-5.006(3)(c)7, F.A.C.]

Recommendation: Establish intensity standards, such as a Floor Area Ratio (FAR) and number of hotel and lodging units, for the primary and ancillary uses within the text of the new land use category “Miami Metrozoo Entertainment Area.” Provide the percentage distribution among the different types of uses as policies of the Comprehensive Plan. If the intensity standards will be the same as described in the development of regional impact Notice of Proposed Change (NOPC), then the County should include a policy establishing these intensity standards in the Comprehensive Plan for the Miami Metrozoo Entertainment Area. If this land use category will have different intensity standards than those listed in the NOPC, then these standards should be established in a policy of the Comprehensive Plan and the public facilities analyses needs to be revised based on the new intensity standards. Any capital improvements needed for the next five years to support this project must be included in a financially feasible 5-Year Schedule of Capital Improvements.

Objection 2: The Department of Transportation (FDOT) noted in their comments that the south bound exit ramp from the Homestead Extension of the Florida Turnpike (HEFT) at SW 152nd Street has long delays and queues backing up onto the HEFT mainline in the afternoon rush hour. The ramp congestion is heavily impacted by the operations at the intersection of SW 152nd Street and SW 117th Avenue. FDOT stated that if the intersection of SW 152nd Street and SW 117th Avenue is in need of capacity improvements then approval of the Metrozoo development should be contingent on improvement to this intersection. The submitted data and analysis does not address this project's impacts on the intersection or how any potential impacts will be mitigated.

[Section 163.3177(3), (6)(b),(h) and (j), F.S.; Rule 9J-5.006(3)(b)1 and (c)3, F.A.C.; Rule 9J-5.015(3)(b)2, and 9J-5.016(1), (2), (3)(b)1, 3, 4, 5, (c)1, 6, 8, and (4), F.A.C.]

Recommendation: The traffic impact analysis should be revised to address potential impacts on the SW 152nd Street and SW 117th Avenue intersection. The County should coordinate with the Department of Transportation regarding improvements at the intersection of SW 152nd Street and SW 117th Avenue and widening SW 117th Avenue between the HEFT and SW 152nd Street. If this improvement will be needed in the next 5 years, the project will also need to be included in the financially feasible 5-year schedule of capital improvements.

II. COMMENTS

None.

III. CONSISTENCY WITH THE STATE COMPREHENSIVE PLAN

The amendments are not consistent with and do not further the goals and policies of the State Comprehensive Plan, Chapter 187, Florida Statutes, for the following provisions:

Goal (15) Land Use, Policies (b) 1 and 3; relates to Objection 1;
Goal (17) Public Facilities, Policies (b) 3 and 6 relates to Objection 2; and
Goal (19) Transportation, Policies (b) 3, 8, 9, and 13 relates to Objection 2; and
Goal (20) Government Efficiency, Policy (b) 1 relates to Objection 2.

Recommendation: By addressing the concerns noted in Section I above, these inconsistencies with Chapter 187, Florida Statutes, can be addressed.



11 BD
9/5/07

FLORIDA DEPARTMENT OF STATE
Kurt S. Browning
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Mr. Ray Eubanks
Department of Community Affairs
Bureau of State Planning
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

September 4, 2007

Re: Historic Preservation Review of the Miami-Dade County (07D1) Comprehensive Plan Amendment

Dear Mr. Eubanks:

According to this agency's responsibilities under Sections 163.3177 and 163.3178, *Florida Statutes*, and Chapter 9J-5, *Florida Administrative Code*, we reviewed the above document to determine if data regarding historic resources have been given sufficient consideration in the request to amend the Miami-Dade County Comprehensive Plan.

We reviewed one proposed amendment to the Miami-Dade County Comprehensive Plan addressing changes to the Miami Metrozoo DRI to consider the potential effects of this action on historic resources. The amendment application indicates that the Miami-Dade County Historic Preservation Officer recommends that a cultural resource assessment survey be conducted by a qualified professional consultant prior to any land clearing or ground disturbing activities. This agency concurs with this recommendation. It is the county's responsibility to ensure that the proposed revision will not have an adverse effect on significant archaeological or historic resources in Miami-Dade County.

If you have any questions regarding our comments, please feel free to contact Susan M. Harp of the Division's Compliance Review staff at (850) 245-6333.

Sincerely,

Frederick P. Gaske, Director

xc: Mr. Bob Dennis

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

☐ Director's Office
(850) 245-6300 • FAX: 245-6436

☐ Archaeological Research
(850) 245-6444 • FAX: 245-6452

☒ Historic Preservation
(850) 245-6333 • FAX: 245-6437

☐ Historical Museums
(850) 245-6400 • FAX: 245-6433

☐ Southeast Regional Office
(904) 316-7115 • FAX: 316-7119

☐ Northeast Regional Office
(904) 875-5015 • FAX: 875-5011

☐ Central Florida Regional Office
(813) 777-3813 • FAX: 777-7310



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Charlie Crist
Governor

Jan K. N. ...
...

...

September 12, 2007

Mr. D. Ray Eubanks
Bureau of Local Planning
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Re: Miami-Dade 07-1D

Dear Mr. Eubanks:

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (Department) has reviewed Miami-Dade County's (County) proposed comprehensive plan amendment package for the Metro Zoo expansion under the required provisions of Chapter 163, Part II, *Florida Statutes*, and Chapters 9J-5 and 9J-11, *Florida Administrative Code*. Our comments and recommendations are provided to assist your agency in developing the state's response.

The on page 2-6 amendment package states that the primary source of water for the proposed expansion will be untreated groundwater from an on-site well. If the anticipated source is the Biscayne Aquifer it should be noted that the South Florida Water management District (SFWMD) considers that water supply to be at its maximum limit. The applicant should explore ways to offset the additional 97,000 gallons per day it will need to supply the expansion area. An example would be the commitment to utilize treated wastewater for all of the current and future irrigation needs of the entire Metro Zoo complex. This would be an excellent way lower the overall requirement of potable water by the use of the lower quality reuse water via the pipeline that will be installed with the proposed expansion of necessary infrastructure.

Thank you for the opportunity to provide comments and recommendations on the proposed amendment. Should you have any questions or require additional information, please contact myself at (850) 245-2169.

Yours sincerely,

Chris Stahl
Environmental Specialist

CJS/



PD

11 PD

MEMORANDUM

AGENDA ITEM #6e

DATE: SEPTMEBER 10, 2007

TO: COUNCIL MEMBERS

FROM: STAFF

SUBJECT: MIAMI-DADE COUNTY PROPOSED COMPREHENSIVE PLAN AMENDMENT

Introduction

On August 13, 2007 Council staff received proposed plan amendment package #07D1 to the Miami-Dade County Comprehensive Development Master Plan (CDMP) for review of consistency with the *Strategic Regional Policy Plan for South Florida (SRPP)*. Staff review is undertaken pursuant to the Local Government Comprehensive Planning and Land Development Regulation Act, Chapter 163, Part II, Florida Statutes (F.S.), and Rules 9J-5 and 9J-11, Florida Administrative Code (F.A.C.).

Community Profile

With a 2006 population estimated at 2,437,022, Miami-Dade County is the most populous county in Florida. The County's population has grown by 8.2% since 2000, and is expected to increase an additional half a million by the year 2020. The percentage of the population that is of working age or younger is larger in Miami-Dade County than the state average. The County also has higher unemployment rates as well as a higher percentage of families with incomes below the poverty level than the state average.

The structure of the County's economy is heavily service and trade oriented, with approximately 57% of total employment in these sectors. The County has established itself as a wholesaling and financial center and major tourist destination. Miami-Dade County ranks ninth in export sales among all metropolitan areas in the country. Almost a quarter of the state's total employment in transportation is located in the County. The Port of Miami is the largest cruise ship port in the world and one of the largest container ports in the southeast. The urbanized portion of the County lies between two national parks, Everglades and Biscayne National Parks. The close relationship of tourism to the preservation of Miami-Dade County's unique native plants and wildlife has been recognized as an economic as well as an environmental issue. In order to manage growth, the County's Comprehensive Development Master Plan establishes an Urban Development Boundary (UDB), which distinguishes the area where urban development may occur from areas where it should not occur.

Additional information regarding the County or the Region may be found on the Council's website at www.sfrpc.com.

Summary of Staff Analysis

Proposed amendment package #07D1 contains text amendments to the Land Use Element and Intergovernmental Coordination Elements of the Comprehensive Development Master Plan (CDMP) to allow development at Miami Metrozoo. A corresponding land use plan amendment is also included in this package. The general location of Miami-Dade County is shown in Attachment 1 and the location of the land use plan amendment is included as Attachment 2.

Text Amendments

Dade County Zoological Park Development of Regional Impact (DRI) was originally approved in 1975. Less than half of the site has been developed as Metro Zoo and the Gold Coast Railroad Museum. In 2005, Miami-Dade County, as property owner, submitted a Notice of Proposed Change (NOPC) to amend the development order to allow for construction of a privately operated hotel (150,000 square feet), family entertainment center (20 acres), and water theme park (23 acres), along with improvements to the existing Gold Coast Railroad Museum. On June 14, 2005 the South Florida Regional Planning Council issued a letter identifying no regional issues with the NOPC. However, the DRI must be consistent with the CDMP and the existing "Parks and Recreation" land use designation does not permit such commercial activity on public park land. Submittal of the CDMP amendment was delayed by the need for a Countywide Referendum, as required by the Miami-Dade County Home Rule Charter, to allow commercial development on the Metrozoo property. The referendum was approved by Miami-Dade County voters on November 7, 2006.

The proposed text amendment to the Land Use Element creates a new land use category "Miami Metrozoo Entertainment Area" for tourist and tourist-related attraction and support facilities (including museums, water park attractions, hotels, and theme-related retail uses).

The proposed text amendment to the Intergovernmental Coordination Element identifies Miami Metrozoo and Miami Metrozoo Entertainment Area as Facilities of Countywide Significance. The intent of the amendment is to ensure that the subject properties remain within the County's jurisdiction even if the surrounding areas are annexed or incorporated in future.

Future Land Use Plan Amendment

The proposed Land Use Plan Amendment would designate 170 acres within the 1,203 acre DRI as "Miami Metrozoo Entertainment Area" land use, as shown on Attachment 2. This area currently designated "Parks and Recreation" on 2015-2025 CDMP Land Use Plan Map, and is primarily underutilized parking lots. The proposed amendment would allow for private operation of the proposed hotel, family entertainment center and water theme park, as proposed in the NOPC. Planned investment in construction of the proposed facilities would be \$76.4 million. Miami-Dade County staff has indicated that this would create 1,873 construction and 2,400 non-construction jobs (average over ten years). Using the Regional Economic Models, Incorporated (REMI) model, staff projected that project will inject \$1.85 billion additional income into the local economy over 12 years.

The proposed amendment would increase potable water demand by 97,000 gallons per day. Potable water is provided by Miami-Dade Water and Sewer Department's (WASD) Alexander Orr Water Treatment Plant, which has sufficient capacity to meet current and proposed water treatment demands. Miami-Dade County staff has advised that prior to adoption of this amendment the Parks and Recreation Department will develop a plan and obtain reservation of water in the WASD water allocation system.

Approximately 1.5 million gallons of non-potable water will be necessary to start up the water park attractions. Thereafter approximately 5,000 gallons per day will be needed to replenish the system. This

water is proposed to come from an on-site groundwater well. However, the Metrozoo site is also being considered as a future location for wastewater recharge. Miami-Dade County agencies are coordinating state agencies to address this issue and necessary the permits.

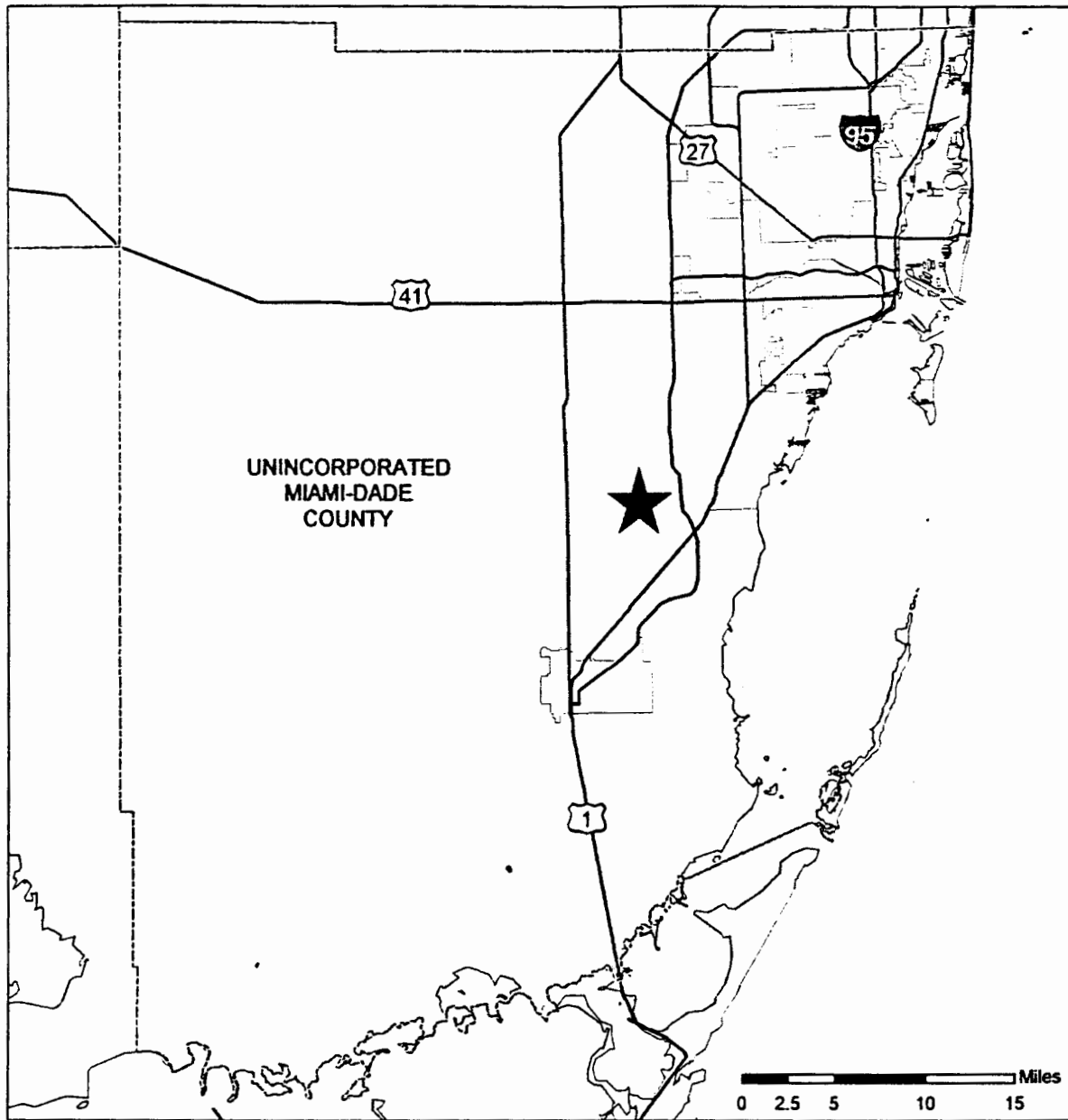
A detailed traffic study submitted with the NOPC shows that the proposed development will increase daily trips by 5,528. However, trips to the zoo and proposed attractions are primarily in the off peak hours. The amendment site is located within a portion of Miami-Dade County that is surrounded by current and pending roadways construction projects, which are funded in the Current Miami-Dade MPO's Transportation Improvement Program (TIP). The study demonstrates that the amendment would not significantly impact the surrounding network, because the impacted roadways would continue to operate within the level of service (LOS) standards defined in the CDMP. In addition, the MPO is conducting a corridor study of SW 152 Street, between Krome Avenue and U.S. 1, which will identify alternatives for improvement adjacent to Metrozoo.

The Miami-Dade Board of County Commissioners approved the transmittal of the proposed amendment by a vote of 9-0-4 at the Commission meeting of July 26, 2007.

Staff analysis confirms that the proposed text amendment is compatible with and supportive of the goals and policies of the *Strategic Regional Policy Plan for South Florida*.

Recommendation

Find Miami-Dade County proposed amendment package #07D1 generally consistent with the *Strategic Regional Policy Plan for South Florida*. Approve this staff report for transmittal to the Florida Department of Community Affairs.



South
Florida
Regional
Planning
Council

COMPREHENSIVE PLAN AMENDMENTS

Location Map

Miami-Dade County
Proposed Amendment #07D1

Sources: FDEP, SFWMD, Miami-Dade County, SFRPC.
Note: For planning purposes only. All distances are approximate.

Attachment

1





South
Florida
Regional
Planning
Council

COMPREHENSIVE PLAN AMENDMENTS

Aerial Map

Miami-Dade County
Proposed Amendment #07D1
From: "Park and Recreation"
To: "Miami Metrozoo Entertainment Area"
170 acres

Sources: Miami-Dade County, SFRPC

Note: For planning purposes only. All distances are approximate.

Attachment

2





Florida Department of Transportation

CHARLIE CRIST
GOVERNOR

District Six
Planning & Environmental Management Office
1000 NW 111 Avenue, Miami, FL 33172
Phone: 305-470-5825 Fax: 305-470-6737

STEPHANIE C. KOPELOUSOS
SECRETARY

September 13, 2007

Mr. Ray Eubanks
Division of Community Planning
Florida Department of Community Affairs
2555 Shumard Oaks Boulevard
Tallahassee, Florida 32399-2100

Subject: Proposed Comprehensive Plan Amendment, Miami-Dade County 07D1

Dear Mr. Eubanks:

The Florida Department of Transportation, District 6, has reviewed the proposed Comprehensive Plan Amendment submitted by Miami-Dade County for the Miami Metrozoo.

We have no major concerns at this time; however, we have the following comment and recommendation:

Comment:

The Department is currently studying the south bound exit ramp from the Homestead Extension of the Florida Turnpike (HEFT) at SW 152nd Street which has long delays and queues backing up onto the HEFT mainline in the afternoon rush hour. The ramp congestion is heavily impacted by the congested operations at the intersection of SW 152nd Street and SW 117th Avenue

Recommendation:

The Department finds that the intersection of SW 152nd Street and SW 117th Avenue is in need of capacity improvements, and that approval of the Metrozoo development should be contingent on improvements to this intersection. Specific recommended improvements should include widening SW 117th Avenue, between the HEFT and SW 152nd Street, as well as improvements to the intersection. The District is available to assist coordination of these improvements with Miami-Dade County and the Turnpike Enterprise.

Mr. Ray Eubanks
September 13, 2007
Page 2

Please contact Phil Steinmiller, at the number above, if you have any questions concerning our response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alice Bravo".

Alice N. Bravo, P.E.
District Director of Transportation Systems Development

Cc: Phil Steinmiller
Kent Rice



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

3301 Gun Club Road, West Palm Beach, Florida 33406 • (561) 686-8800 • FL WATS 1-800-432-2045 • TDD (561) 697-2574
Mailing Address: P.O. Box 24680, West Palm Beach, FL 33416-4680 • www.sfwmd.gov

GOV 08-06

October 8, 2007

Ray Eubanks, Administrator
Plan Review and Processing
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

Dear Mr. Eubanks:

**Subject: Proposed Amendment Comments
Miami-Dade County, DCA #07-1D1**

South Florida Water Management District (District) staff has completed its review of the above subject amendment. We have the following comments.

Page 3-19 of the application indicates that the proposed water park will require 1.5 million gallons of non-potable water for fill-up and an additional 5,000 gallons per day for replenishment due to evaporation and spillage. Page 3-19 of the application indicates that irrigation water will be supplied by either an on-site well or an adjacent lake. According to Page 2-6 of the application, the applicant has stated that non-potable water for the water park will come from an on-site well. It is presumed that the proposed source would be the Biscayne Aquifer. However, the use of water from this source may be limited, pursuant to the District's Regional Availability Rule. In addition, the Miami-Dade County Water and Sewer Department is planning a future wastewater recharge project at Metrozoo. Due to public health-related concerns the health department may require the proposed water park to use potable water for initial fill-up and to replenish daily losses.

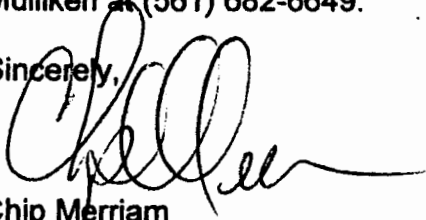
Considering that it will be necessary for the County to construct a pipeline to convey the treated wastewater to Metrozoo for the proposed wastewater recharge project, the District strongly recommends that the County consider utilizing reclaimed water to supply all existing and proposed landscape irrigation needs at Metrozoo. By using this source of water, Metrozoo can be a good steward of water resources as well as international wildlife resources.

Ray Eubanks, Administrator
October 8, 2007
Page 2

Page 3-17 of the application indicates that the proposed project will require 97,000 gallons per day of potable water. This figure does not include the use of potable water for the water park, which may be necessary to meet health department requirements. Page 3-16 of the document indicates that the County anticipates receiving their 20-year Consumptive Use Permit from the District in November of this year. If the District issues the permit prior to the adoption of this amendment, which is scheduled for December 6th of this year (according to Table 1 on page ii of the application), then the County will have an adequate supply of potable water to meet the demands of this project, including use of potable water for the initial fill-up and replenishment of the proposed water park.

If you have any questions or require additional information, please contact John Mulliken at (561) 682-6649.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chip Merriam', written over the word 'Sincerely,'.

Chip Merriam
Deputy Executive Director
Water Resources
South Florida Water Management District

CM/jg/jl

c: George M. Burgess, Miami-Dade County
Bob Dennis, DCA
Carolyn Dekle, SFRPC