

**APPLICATION NO. 5
STANDARD AMENDMENT APPLICATION**

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

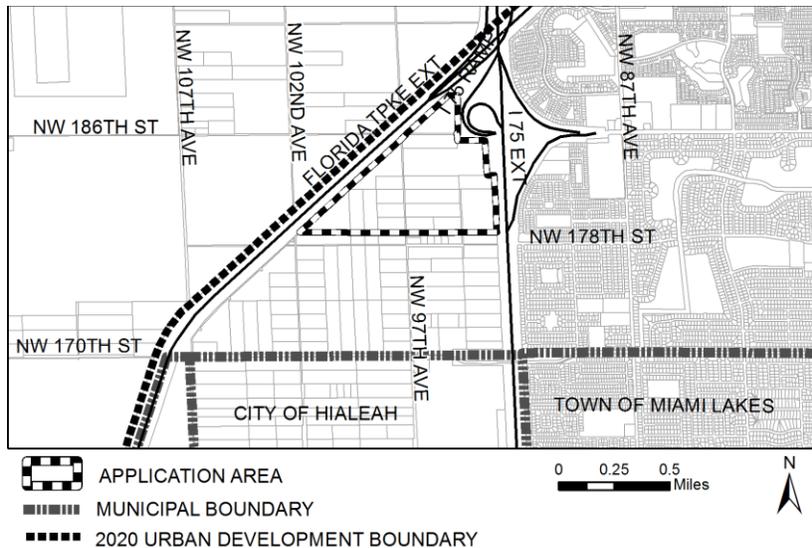
Requested Amendment to the CDMP LUP map and text:

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

Location: East of the HEFT and west of I-75 between NW 170 Street and the intersection of I-75 and HEFT.

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

Acreage Owned by Applicant: ±92.25 Gross ; ±72.53 Net



Notes:

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

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

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

1. APPLICANT

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

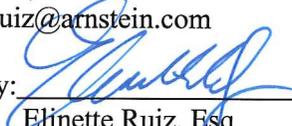
2. APPLICANT'S REPRESENTATIVES

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By: 
Miguel Diaz de la Portilla, Esq.

11/30/15
Date

By: 
Elinette Ruiz, Esq.

11/30/15
Date

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PLANNING & ZONING
METROPOLITAN PLANNING
DISTRICT

3. DESCRIPTION OF REQUESTED CHANGE

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

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

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

B. Description of the Subject Property.

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

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

C. Gross and Net Acreage.

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

D. Requested Change.

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

4. REASONS FOR AMENDMENT

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

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

Redesignation of the American Dream Miami Application Area

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

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

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

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

Text Amendment to Land Use Element

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

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

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

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

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

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

Changes to the Transportation Element

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

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

Consistency with CDMP Objectives and Policies

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

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

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

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

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

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

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

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

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

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

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

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

LU-1C: Miami-Dade County shall give priority to infill development on vacant sites in currently urbanized areas, and redevelopment of substandard or underdeveloped environmentally suitable urban areas contiguous to existing urban development where all necessary urban services and facilities are projected to have capacity to accommodate additional demand.

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

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

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

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

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

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

LU-2A. All development orders authorizing new, or significant expansion of existing, urban land uses shall be contingent upon the provision of services at or above the Level of Services (LOS) standards specified in the Capital Improvements Element (CIE).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5. LOCATION MAP FOR APPLICATION

See Attached Exhibit C

6. ADDITIONAL MATERIAL SUBMITTED

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

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

7. DISCLOSURE OF INTEREST

See Attached Exhibit B

EXHIBIT A

Attachments



EXHIBIT B

Attachments



DISCLOSURE OF INTEREST

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

1. APPLICANT (S) NAME AND ADDRESS:

International Atlantic LLC

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

APPLICANT B:

APPLICANT C:

APPLICANT D:

APPLICANT E:

APPLICANT F:

APPLICANT G:

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

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

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

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

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

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

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

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

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

CORPORATION NAME: International Atlantic LLC, Limited Liability Company

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

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

TRUSTEES
NAME: N/A

BENEFICIARY'S NAME AND ADDRESS

PERCENTAGE OF INTEREST

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

PARTNERSHIP NAME: N/A

NAME AND ADDRESS OF PARTNERS

PERCENTAGE OF INTEREST

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

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

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

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

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

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

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

CORPORATION NAME:

NAME, ADDRESS, AND OFFICE (if applicable)

PERCENTAGE OF
STOCK

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

TRUSTEE'S NAME:

BENEFICIARY'S NAME AND ADDRESS

PERCENTAGE OF
INTEREST

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

PARTNERSHIP NAME:

NAME AND ADDRESS OF PARTNERS

PERCENTAGE OF OWNERSHIP

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

NAME, ADDRESS, AND OFFICE (if applicable)

PERCENTAGE OF INTEREST

Date of Contract: _____

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

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

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

Applicant's Signatures and Printed Names

International Atlantic LLC,

a Delaware Limited Liability Company



By: _____

Name: _____

Title: _____

[Handwritten Signature]
Ander Sheenemjian
Authorized Signatory

Sworn to and subscribed before me

this 24th day of November, 49 2015

Ratna R. Patel

Notary Public, State of ~~Florida~~ at Large (SEAL)

New Jersey

My Commission Expires:

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

EXHIBIT "A"

Owner of Record	Folio Number	Size in Acres	Applicant's Interest In Property
Portion: International Atlantic LLC Portion: State of Florida Department of Transportation (PORTION)	30-2004-000-0040	ADM = 0.61 (1) FDOT = 14.09 (1)	Owner Adjacent Owner
TGC Sec 8-9 North Point LLC	30-2008-001-0040	4.67	Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2008-001-0050	4.67	Contractor for Purchase
The Graham Companies	30-2008-001-0060	4.67	Contractor for Purchase
The Graham Companies	30-2008-001-0070	4.67	Contractor for Purchase
The Graham Companies (PORTION)	30-2008-001-0080	ADM = 0.51	Contractor for Purchase
TGC Sec 8-9 North Point LLC (PORTION)	30-2008-001-0240	ADM = 8.18	Contractor for Purchase
TGC Sec 8-9 North Point LLC (PORTION)	30-2008-001-0230	ADM = 8.18	Contractor for Purchase
TGC Sec 8-9 North Point LLC (PORTION)	30-2008-001-0300	ADM = 29.85	Contractor for Purchase
International Atlantic LLC (PORTION)	30-2009-001-0170	ADM = 32.70 (2) FDOT = 3.58 (2)	Owner
International Atlantic LLC (Successor by merger to Oprico LLC)	30-2009-001-0200	6.43	Owner
The Graham Companies (PORTION)	30-2009-001-0240	ADM = 0.73	Contractor for Purchase
The Graham Companies (PORTION)	30-2009-001-0241	ADM = 0.28	Contractor for Purchase
The Graham Companies (PORTION)	30-2009-001-0242	ADM = 0.14	Contractor for Purchase
The Graham Companies (PORTION)	30-2009-001-0250	ADM = 0.14	Contractor for Purchase
The Graham Companies (PORTION)	30-2009-001-0251	ADM = 0.14	Contractor for Purchase
The Graham Companies (PORTION)	30-2009-001-0252	ADM = 0.14	Contractor for Purchase
The Graham Companies (NOT-A-PART)	30-2009-001-0253	ADM = 0.14	Contractor for Purchase
The Graham Companies (PORTION)	30-2009-001-0254	ADM = 0.27	Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2009-001-0260	5.00	Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2009-001-0265	5.00	Contractor for Purchase
TGC Sec 8-9 North Point LLC	30-2009-001-0270	9.99	Contractor for Purchase
Tract 29 LLC	30-2009-001-0290	9.99	Contractor for Purchase
Portion: International Atlantic LLC Portion: State of Florida Department of Transportation (PORTION)	30-2009-001-0320	ADM = 7.08 (3) FDOT = 2.05 (3)	Owner Adjacent Owner

- (1) ADM - FDOT PARCEL 110
FDOT - FDOT PARCELS 102 & 103
- (2) ADM - PORTIONS OF TRACTS 17, 18, 19, 30 & 31
FDOT - FDOT PARCEL 106
- (3) ADM - PORTION OF TRACT 32 & FDOT PARCEL 111
FDOT - FDOT PARCEL 104

112826461.1

EXHIBIT B

THE GRAHAM COMPANIES STOCKHOLDERS
RECORD DATE NOVEMBER 18, 2015

	A		B		TOTAL	
	SHARES	%	SHARES	%	SHARES	%
WILLIAM A GRAHAM FAMILY						
CGW & EGM, Co-Tees of the PCG Rev Trust w/d dtd 3/25/94	-	-	89,108.3944	9.79	89,108.3944	8.5017
CGW & EGM, Co-Tees, fbo Marital Trust, dtd 3/25/94	26,026.1000	18.92	34,922.2000	3.84	60,948.3000	5.8150
CDY, tee, SG Younts Family Trust, fbo CD Younts, dtd 3/3/2010	-	-	2,047.8000	0.22	2,047.8000	0.1954
SS WYLLIE, Tee, WEG Rev Tr dated 3/25/99	-	-	-	-	-	-
CAROL G. WYLLIE	24,760.0000	0.02	179.5400	0.02	204.3000	0.0195
CAROL G. WYLLIE 2012 Family Trust Agreement	9,000.0000	6.54	38,810.8200	4.26	47,810.8200	4.5616
GRAHAM-WYLLIE Family Trust Agreement	-	-	9,190.7700	1.01	9,190.7700	0.8769
CYNTHIA G. GORDON	6,815.0000	4.95	24,723.1027	2.72	31,538.1027	3.0390
CGW, tee, Gordon Family Irrev Trust fbo KP GORDON, dtd 12/19/12	-	-	4,595.3800	0.50	4,595.3800	0.4384
CGW, tee, Gordon Family Irrev Trust fbo LVV GORDON, dtd 12/19/12	-	-	4,595.3800	0.50	4,595.3800	0.4384
ELIZABETH G. MARTINEZ	-	-	70.7954	0.01	70.7954	0.0068
ELIZABETH G. MARTINEZ 2012 Family Trust Agreement	6,405.9700	4.71	44,878.9200	4.93	51,362.8900	4.9005
GRAHAM-MARTINEZ Family Trust Agreement	-	-	12,232.9500	1.34	12,232.9500	1.1671
LUIS O. MARTINEZ	-	-	81.8713	0.01	81.8713	0.0078
LUIS O. MARTINEZ Family Trust	4,341.0000	3.15	8,587.8079	0.94	12,908.8079	1.2310
MICHAEL A. MARTINEZ	-	-	1,643.3800	0.18	1,643.3800	0.1568
DANIEL L. MARTINEZ	-	-	5,189.1400	0.57	5,189.1400	0.4950
KATHRYN N. MARTINEZ	-	-	1,643.3800	0.18	1,643.3800	0.1568
ALISON J. MARTINEZ	-	-	4,971.4200	0.55	4,971.4200	0.4743
STUART S. WYLLIE	-	-	139.9363	0.02	139.9363	0.0134
STUART WYLLIE 2012 Family Trust Agreement	5,295.7600	3.85	11,778.0000	1.29	17,073.7600	1.6290
BENJAMIN C. GORDON	4,341.0000	3.15	4,802.6792	0.53	9,143.6792	0.8724
KATHLEEN P. GORDON	-	-	1,643.3800	0.18	1,643.3800	0.1568
LEE W. GORDON	-	-	1,643.3800	0.18	1,643.3800	0.1568
TRACY F. GRAHAM	-	-	1,773.0000	0.19	1,773.0000	0.1692
ANDREA L. GRAHAM	1,630.4300	1.18	13,476.3800	1.48	15,106.8100	1.4413
AG RECHICHI, tee of Trust fbo AG RECHICHI ctd u/A VIII of WEG Tst	3,407.5000	2.48	15,962.8845	1.75	19,370.3845	1.8401
RECHICHI CHILDREN'S TRUST, fbo William M. Rechichi	-	-	187.1345	0.02	187.1345	0.0179
KRISTOPHER E. GRAHAM	-	-	11,206.0000	1.23	11,206.0000	1.0691
KE GRAHAM, tee of Trust fbo KE GRAHAM ctd u/A VIII of WEG Tst '99	3,407.5000	2.48	14,800.8845	1.60	18,008.3845	1.7182
EGM, Tee, L. E. WYLLIE TR u/a/d 8/4/93	815.2200	0.59	10,542.4972	1.16	11,357.7172	1.0836
LAURA E. WYLLIE	-	-	4,986.7600	0.55	4,986.7600	0.4768
EGM, Tee, P. S. WYLLIE TR u/a/d 8/4/93	815.2200	0.59	10,723.2872	1.18	11,538.5072	1.1009
PHILIP S. WYLLIE	-	-	4,805.9700	0.53	4,805.9700	0.4585
CGW, Tee, D. L. MARTINEZ TR u/a/d 12/30/93	1,873.1600	1.36	6,296.1683	0.69	8,169.3183	0.7704
CGW, Tee, A. J. MARTINEZ TR u/a/d 12/30/93	1,873.1600	1.38	6,523.8782	0.72	8,397.0382	0.8011
CGW, Tee, M. A. MARTINEZ TR u/a/d 12/30/93	688.8350	0.50	12,230.1348	1.34	12,918.9698	1.2326
CGW, Tee, K. N. MARTINEZ TR u/a/d 12/30/93	688.8350	0.50	12,230.1348	1.34	12,918.9698	1.2326
CGG, As Custodian for K. GORDON u/Co Unif Trs	1,902.1700	1.38	5,414.1348	0.59	7,316.3048	0.6980
CGG, Tee, L. W. GORDON TR u/a/d 10/16/92	543.4800	0.39	9,260.1348	1.02	9,803.6148	0.9353
JOAN G. GRAHAM	220.0000	0.16	1,785.0000	0.17	1,785.0000	0.1703
	80,195.1000	58.29	449,262.8000	49.34	529,447.9000	50.5138
D. ROBERT GRAHAM FAMILY						
D. ROBERT GRAHAM REVOC LIV TR 9/1/2000	28,718.5000	20.87	14,319.5434	1.57	43,038.0434	4.1062
ADELE K. GRAHAM REVOC LIV TR 9/1/2000	-	-	9,400.0000	1.03	9,400.0000	0.8968
GWENDOLYN GRAHAM	950.0000	0.59	46,058.7690	5.08	47,008.7690	4.4850
GWENDOLYN GRAHAM, Tee, MARK E. LOGAN TR	-	-	955.5599	0.10	955.5599	0.0912
GWENDOLYN GRAHAM, Tee, SARAH G. LOGAN TR	-	-	955.5602	0.10	955.5602	0.0912
GWENDOLYN GRAHAM, Tee, TIMOTHY G. LOGAN TR	-	-	955.5599	0.10	955.5599	0.0912
GLYNN B. McCULLOUGH	799.0000	0.58	35,561.0965	3.91	36,360.0965	3.4691
WILLIAM B. McCULLOUGH	-	-	2,723.3580	0.30	2,723.3580	0.2598
McCULLOUGH Family Trust fbo MELISSA G. McCULLOUGH	-	-	614.6951	0.07	614.6951	0.0588
McCULLOUGH Family Trust fbo WILLIAM G. McCULLOUGH	-	-	614.6951	0.07	614.6951	0.0588
McCULLOUGH Family Trust fbo CAROLINE A. McCULLOUGH	-	-	614.6947	0.07	614.6947	0.0588
ARVA G. GIBSON	950.0000	0.69	38,846.6000	4.27	39,796.6000	3.7969
THOMAS C. GIBSON	-	-	832.0000	0.09	832.0000	0.0794
THOMAS C. GIBSON, Tee, Gift Trust KENDALL C. GIBSON	-	-	1,727.6698	0.19	1,727.6698	0.1648
THOMAS C. GIBSON, Tee, Gift Trust ANSLEY S. GIBSON	-	-	1,727.6696	0.19	1,727.6696	0.1648
THOMAS C. GIBSON, Tee, Gift Trust ADELE E. GIBSON	-	-	1,727.6698	0.19	1,727.6698	0.1648
KENDALL G. ELIAS	950.0000	0.69	46,842.6010	5.14	47,792.6010	4.5598
L. ROBERT ELIAS III	-	-	6,013.7604	0.66	6,013.7604	0.5738
L. ROBERT ELIAS III, tee, Payton Elias Trust und Elias Children's Trust	-	-	1,040.2488	0.11	1,040.2488	0.0992
L. ROBERT ELIAS III, tee, Lewis R. Elias Trust und Elias Children's Trust	-	-	1,040.2488	0.11	1,040.2488	0.0992
	32,367.5000	23.52	212,572.0000	23.35	244,939.5000	23.3693
PHILIP L. GRAHAM FAMILY						
DONALD E. GRAHAM	7,222.3000	5.25	75,458.3000	8.29	82,680.6000	7.8894
WILLIAM W. GRAHAM, Tee, WWG 1969 Revoc Trust	8,472.2000	6.16	86,708.3000	9.52	95,180.5000	9.0810
STEPHEN M. GRAHAM	2,222.2000	1.62	30,458.4000	3.35	32,680.6000	3.1180
	17,916.7000	13.02	192,625.0000	21.16	210,541.7000	20.0874
MARY GRAHAM CROW FAMILY						
PHILIP G. CROW	-	-	3,251.7000	0.36	3,251.7000	0.3102
MARY YORK BEHNCKE	-	-	2,790.0000	0.31	2,790.0000	0.2662
	-	-	6,041.7000	0.66	6,041.7000	0.5764
FREDERICK S. BEEBE FAMILY						
WALTER H. BEEBE	751.0000	0.55	13,599.0000	1.54	14,350.0000	1.4073
MICHAEL BEEBE	596.0000	0.43	6,170.0000	0.68	6,766.0000	0.6455
	1,347.0000	0.98	20,169.0000	2.22	21,516.0000	2.0528
GERALD E. TOMS FAMILY						
THOMAS N. TOMS II	1,456.0000	1.06	9,949.8000	1.09	11,405.8000	1.0882
LOUIS B. TOMS	1,419.7000	1.03	9,733.3000	1.07	11,153.0000	1.0641
ELIZABETH T. BRINEGAR	1,413.0000	1.03	4,878.3000	0.54	6,291.3000	0.6002
MARGARET TOMS	1,479.0000	1.07	5,309.7000	0.58	6,788.7000	0.6477
	5,767.7000	4.19	29,871.1000	3.28	35,638.8000	3.4022
TOTAL SHARES OUTSTANDING	137,694.0000	100.00	910,531.6000	100.00	1,048,125.6000	100.0000
TREASURY STOCK	91,677.1000		1,154,697.3000		1,246,574.4000	
TOTAL SHARES AUTHORIZED	229,471.1000		2,065,228.9000		2,294,700.0000	

EXHIBIT C

Attachments



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

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

Representatives:

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(305) 675-0519 (fax)
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Description of Subject Area:

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

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

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

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

Exhibit C



EXHIBIT D

Attachments



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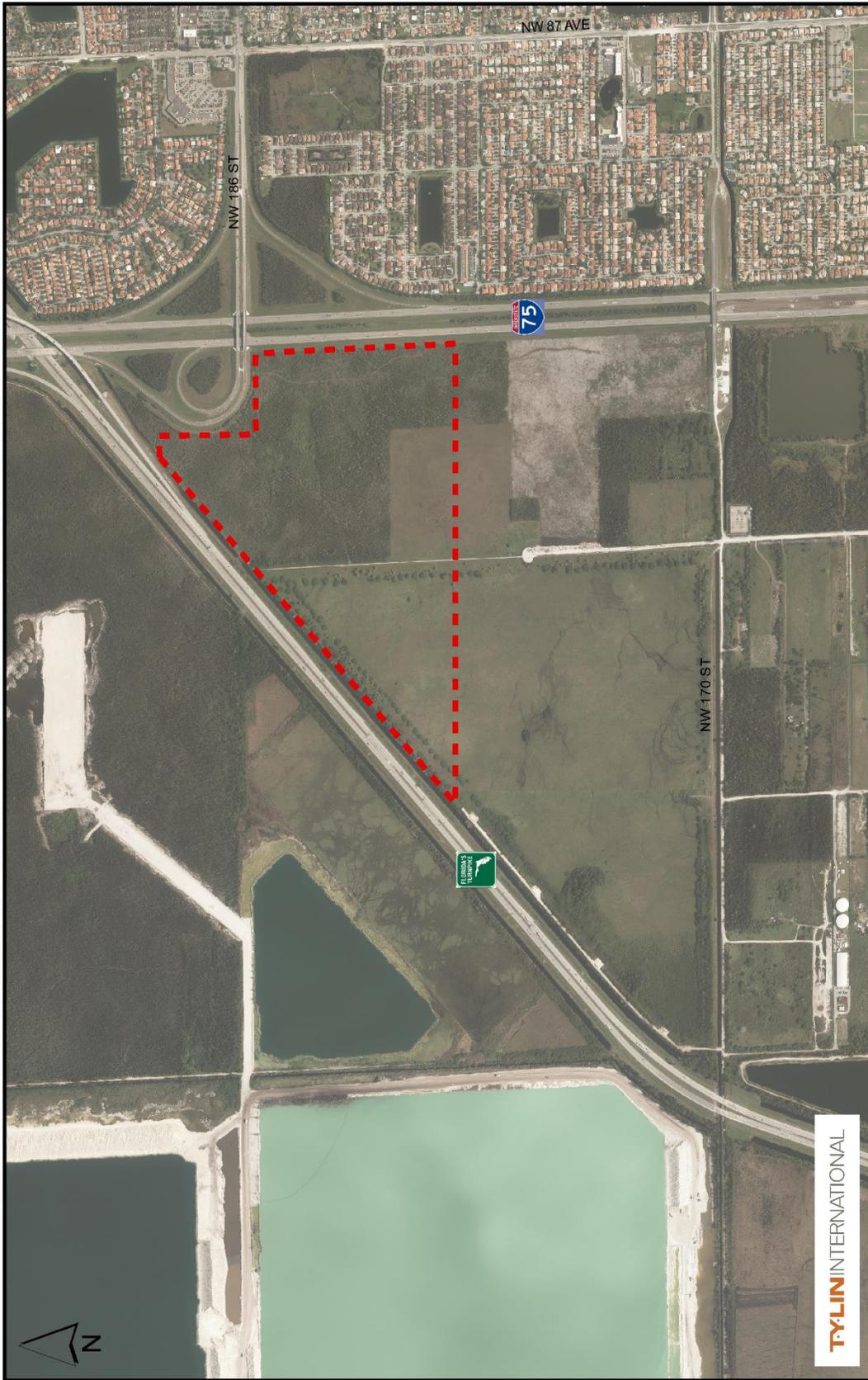


Exhibit D
Aerial Map (2015)
American Dream Miami
October 2015

Legend
Site Boundary

EXHIBIT E

Attachments



AMERICAN DREAM
MIAMI



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

Legend

-  Site Boundary
-  Public Land Survey System

Exhibit E
Section Sheet
American Dream Miami
October 2015

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Additional Material

Responses to Pertinent ADA Questions

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

Additional Material

QUESTION 5 - DEVELOPMENT INFORMATION

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

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

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

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

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

QUESTION 8 - PERMIT INFORMATION

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

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

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



AMERICAN DREAM MIAMI

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

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

PART II. GENERAL SECTION

QUESTION 9 - MAPS

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

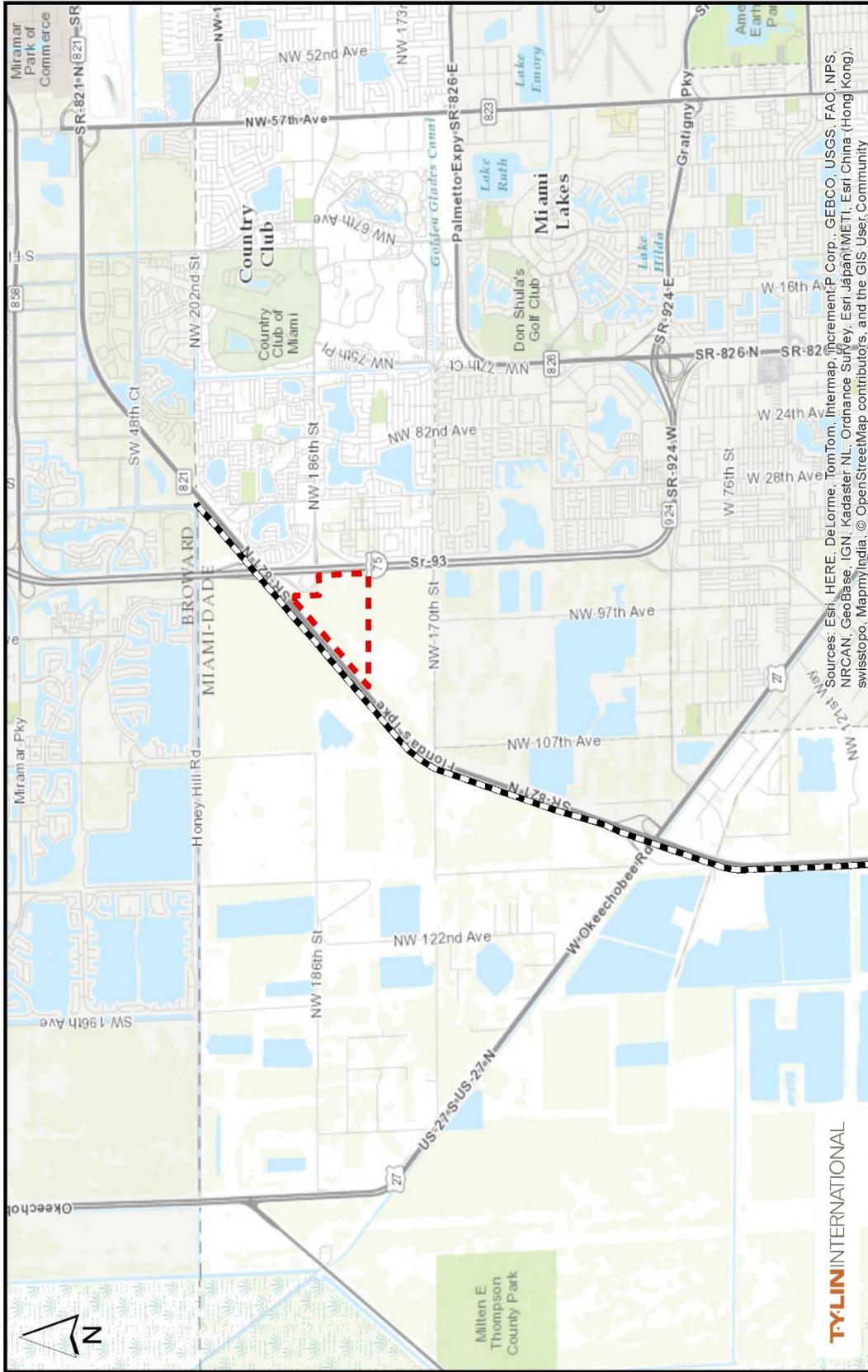
- Map A. A general location map. Indicate the location of any urban service area boundaries and regional activity centers in relation to the project site.
- Map B. A recent vertical aerial photo of the site showing project boundaries which reasonably reflects current conditions. Specify the date the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

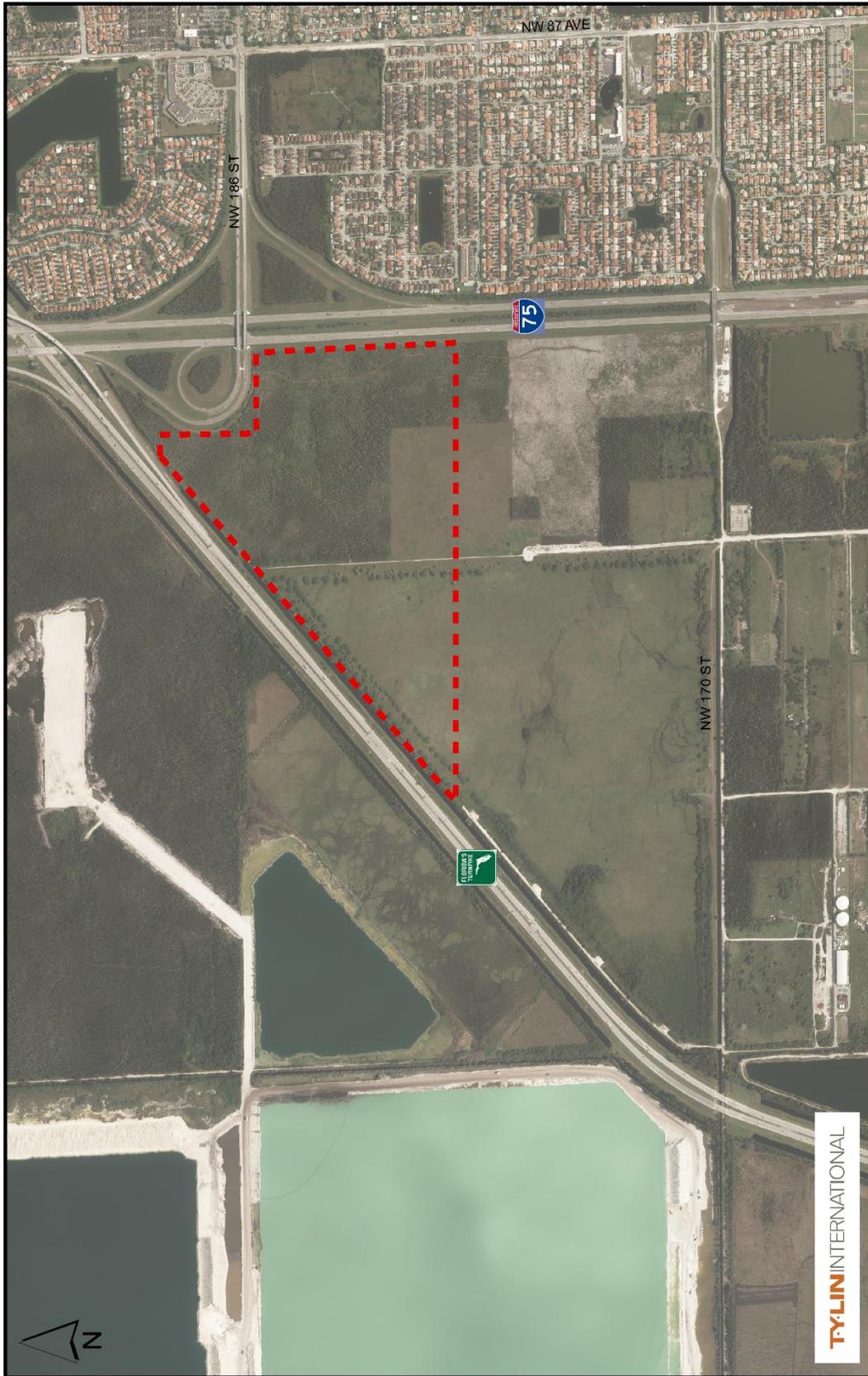
areas, easements, right-of-way, roads, and other significant elements such as transit stops, pedestrian ways, etc. This plan will provide the basis for discussion in Question 10-A as well as other questions in the ADA.

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

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

Attached please find Exhibits Map A through Map J





TYLIN INTERNATIONAL

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

Legend
Site Boundary



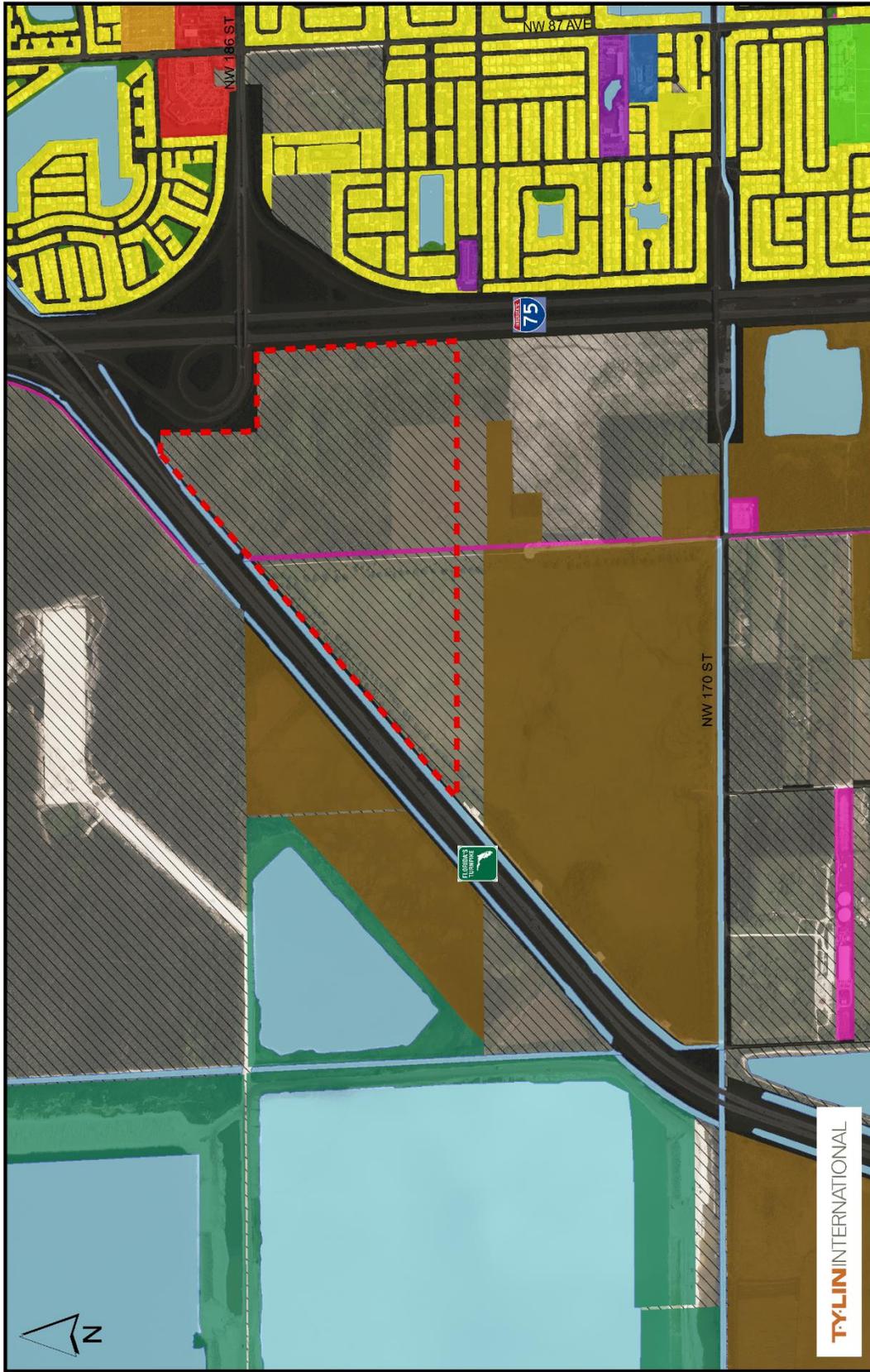
Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, Swisstopo, Mapbox India, OpenStreetMap contributors, and the GIS User Community

TYLIN INTERNATIONAL

Map C
Topographic Map
American Dream
October 2015

Legend

- Site Boundary



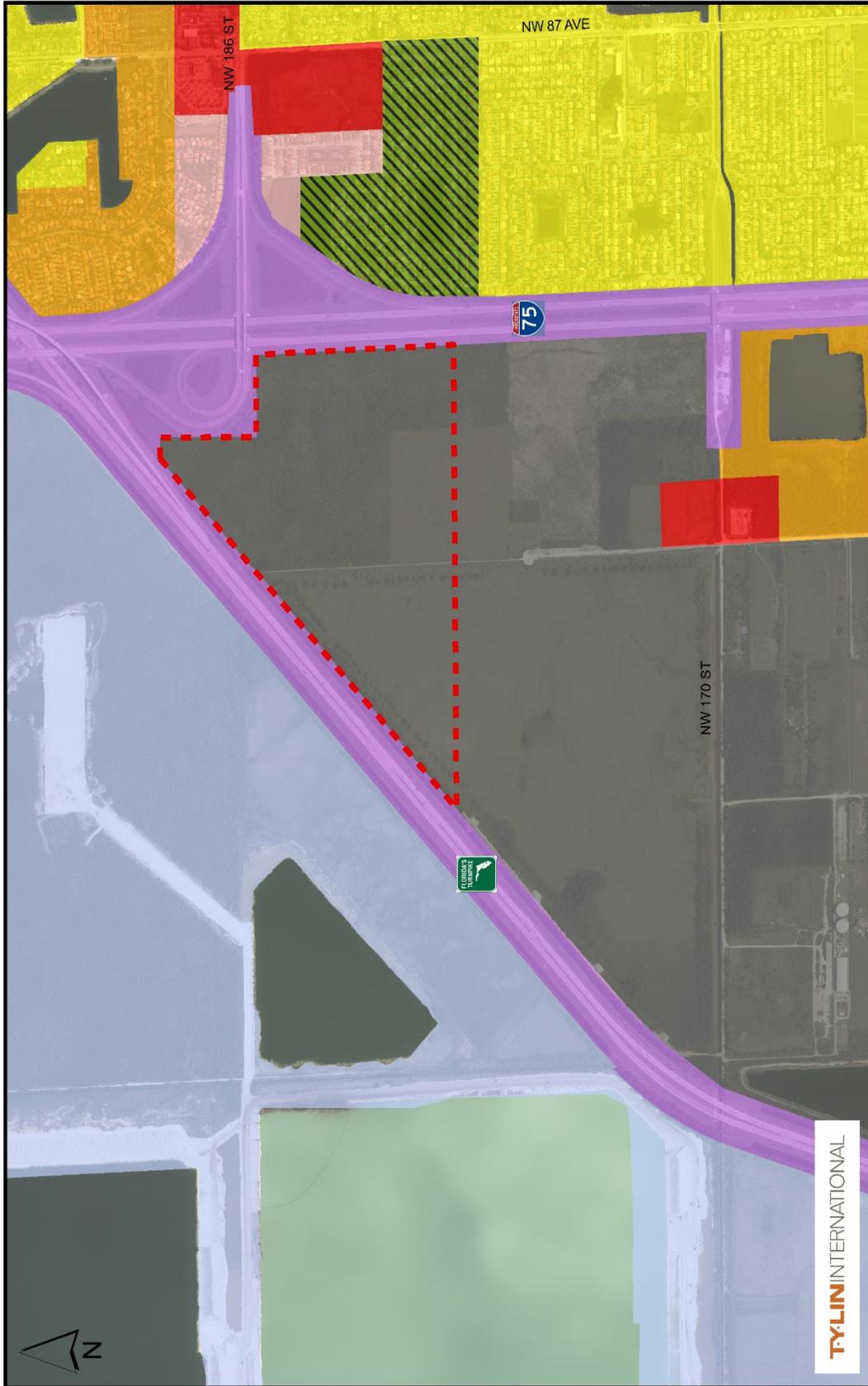
Map D-1
Existing Land Use Map
American Dream Miami
October 2015

Source: Miami-Dade County GIS Self Services

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

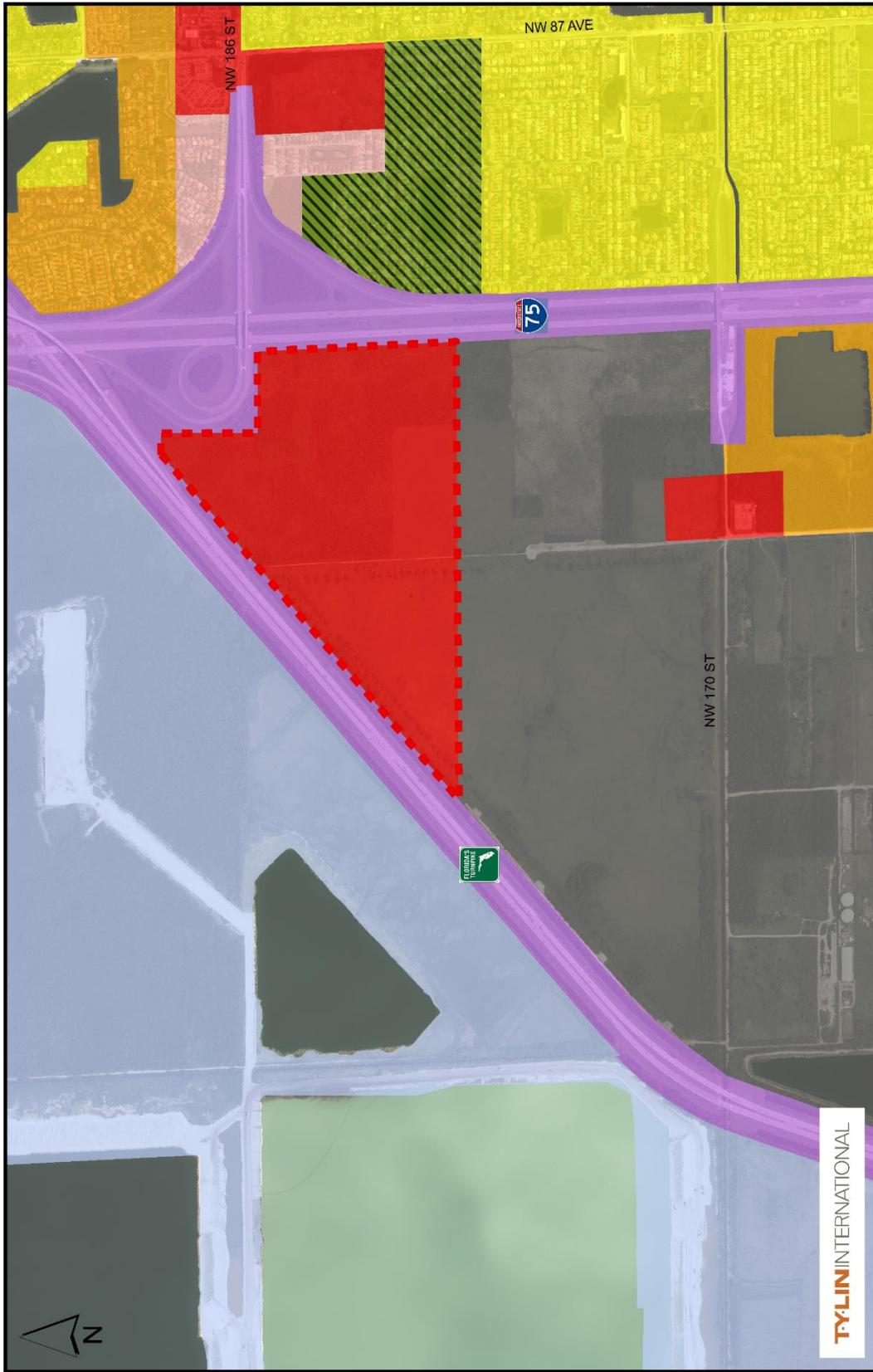
Legend

TYLIN INTERNATIONAL



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

- Legend** Source: Adopted 2020-2030 Miami-Dade County Comprehensive Development Master Plan
- ▬ Site Boundary
 - ▬ Future Land Use
 - LOW-MEDIUM DENSITY RESIDENTIAL (LMDR) 6-13 DU/JAC
 - INDUSTRIAL AND OFFICE
 - BUSINESS AND OFFICE
 - ESTATE DENSITY RESIDENTIAL (ONE DENSITY INCREASE)
 - LOW DENSITY RESIDENTIAL (LDR) 2.5-6 DU/JAC
 - OFFICE/RESIDENTIAL
 - OPEN LAND
 - TRANSPORTATION (ROW, RAIL, METRO RAIL, ETC.)



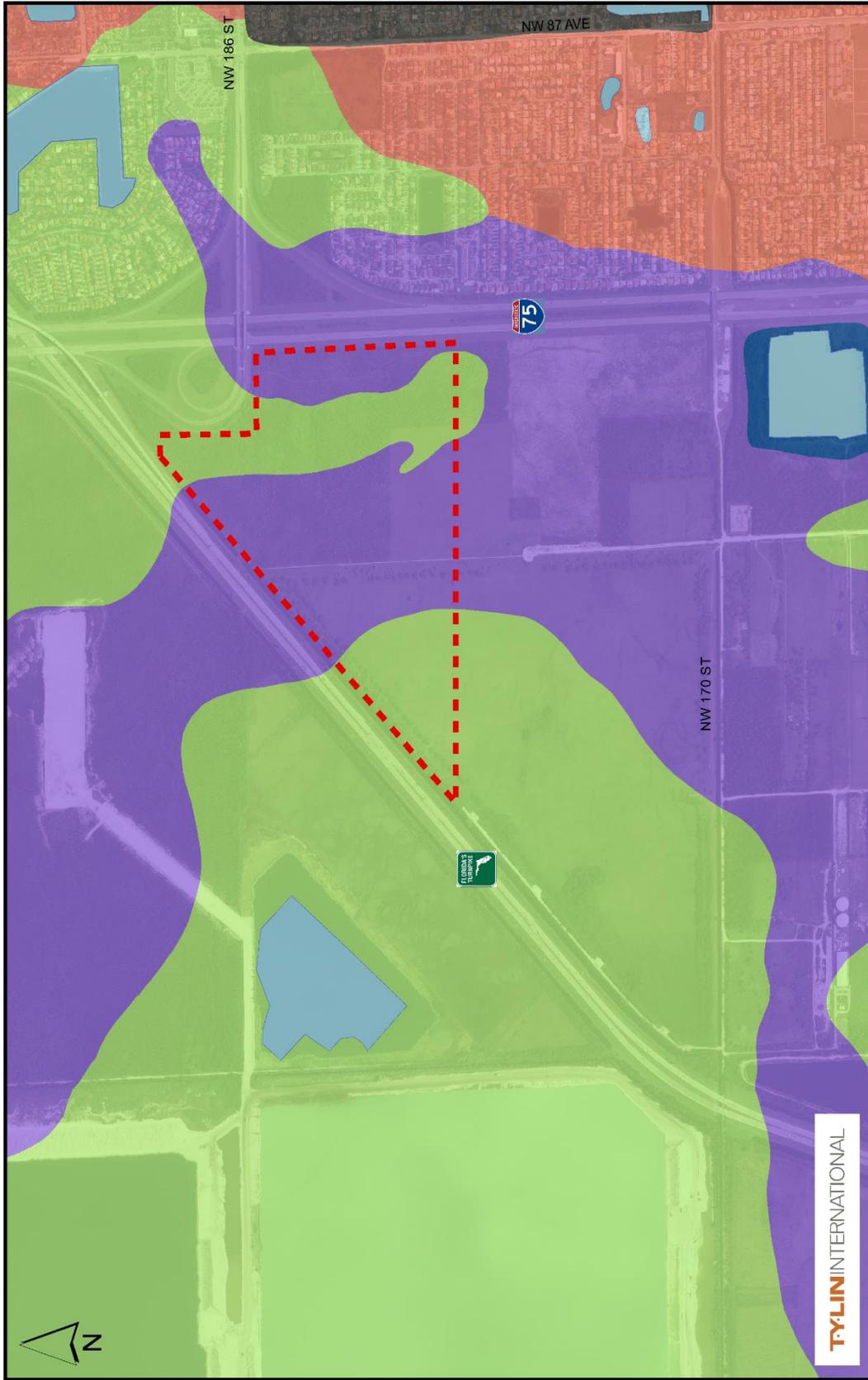
Map D-3
Proposed Future Land Use Map
American Dream Miami
October 2015

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

Legend

Proposed Future Land Use

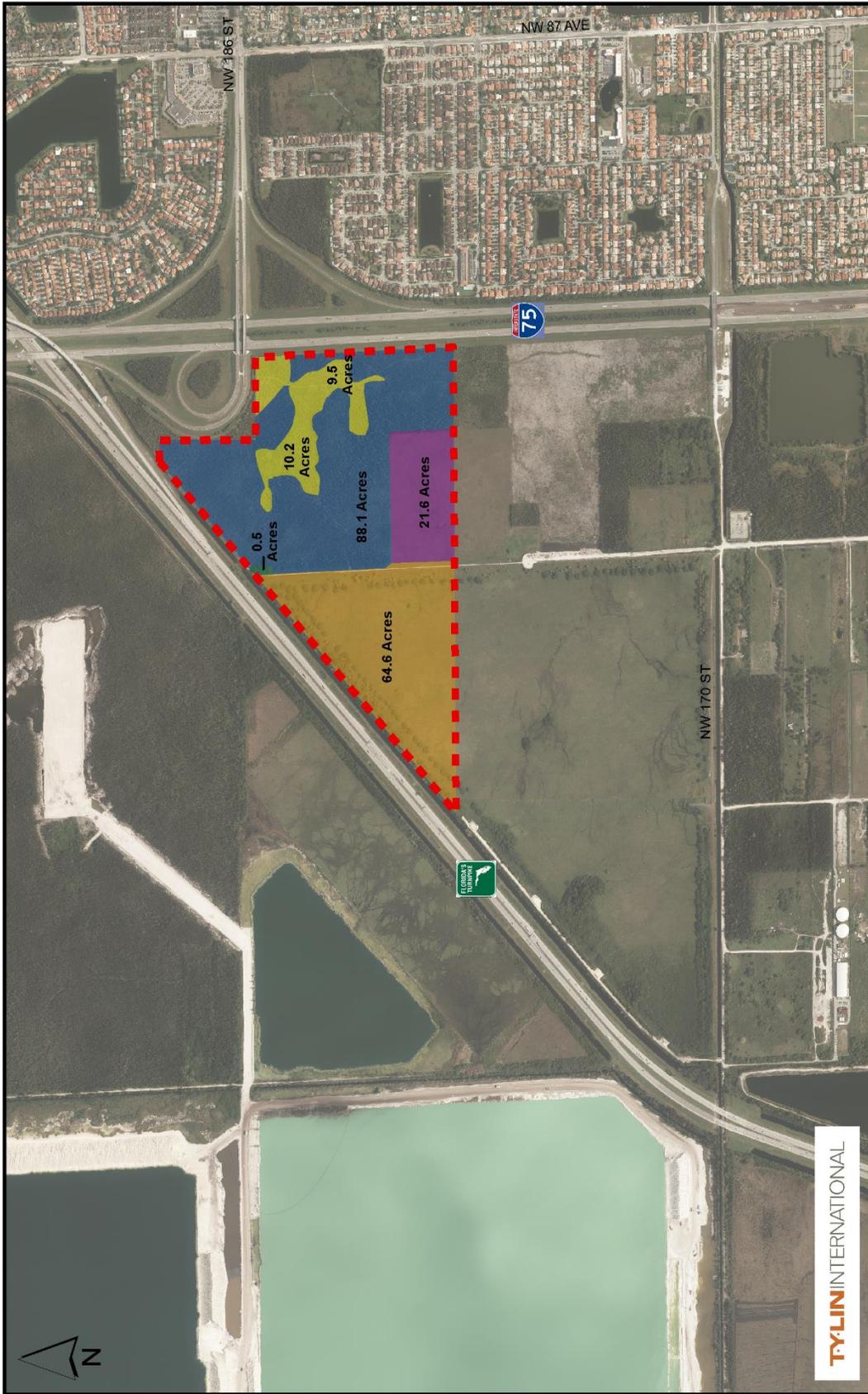
TYLIN INTERNATIONAL



Map E
Soils
 American Dream Miami
 October 2015

Legend Source: Natural Resources Conservation Service, 2012

	Site Boundary		LAUDERHILL MUCK, DEPRESSIONAL		URBAN LAND
	Soils		PLANTATION MUCK		WATER
			UDORTHENTS-WATER COMPLEX		
			DANIA MUCK, DEPRESSIONAL		



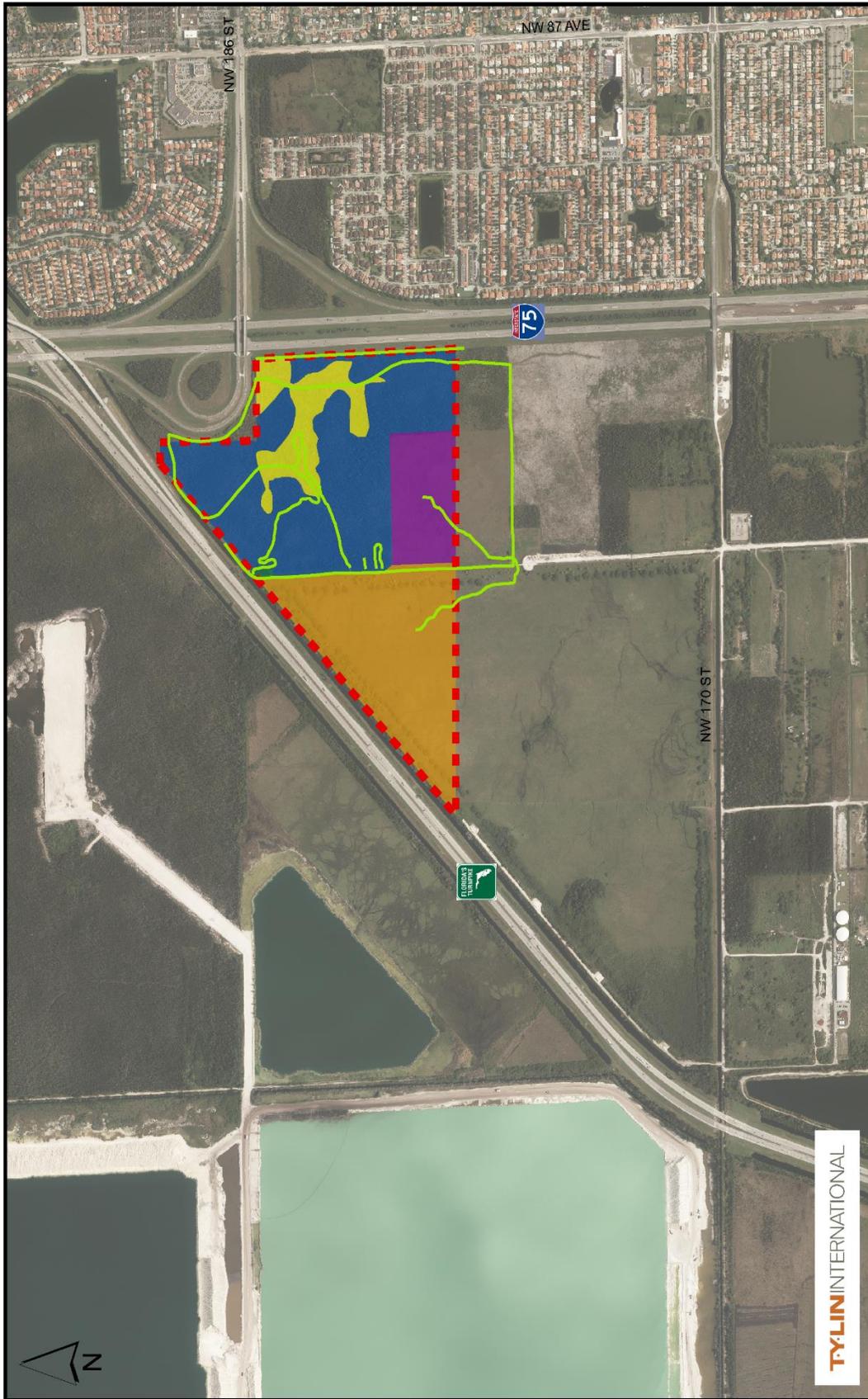
Map F
Vegetation
American Dream Miami
October 2015

Legend

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

Source: TY Lin International, Oct. 2015

TYLIN INTERNATIONAL



Map G
 Transects Map
 American Dream Miami
 October 2015

- Source: Ty Lin International, Oct. 2015
- | | |
|-----------------------------|------------------------------|
| Vegetation | 619 EXOTIC WETLAND HARDWOODS |
| 211 IMPROVED PASTURES | 631 WETLAND SCRUB |
| 439 OTHER HARDWOODS | 641 FRESHWATER MARSHES |
| 617 MIXED WETLAND HARDWOODS | |

- Legend**
- Walking Transects
 - Site Boundary

TYLIN INTERNATIONAL



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

TYLIN INTERNATIONAL

Map H
Master Development Plan
American Dream
October 2015

Legend
 Site Boundary

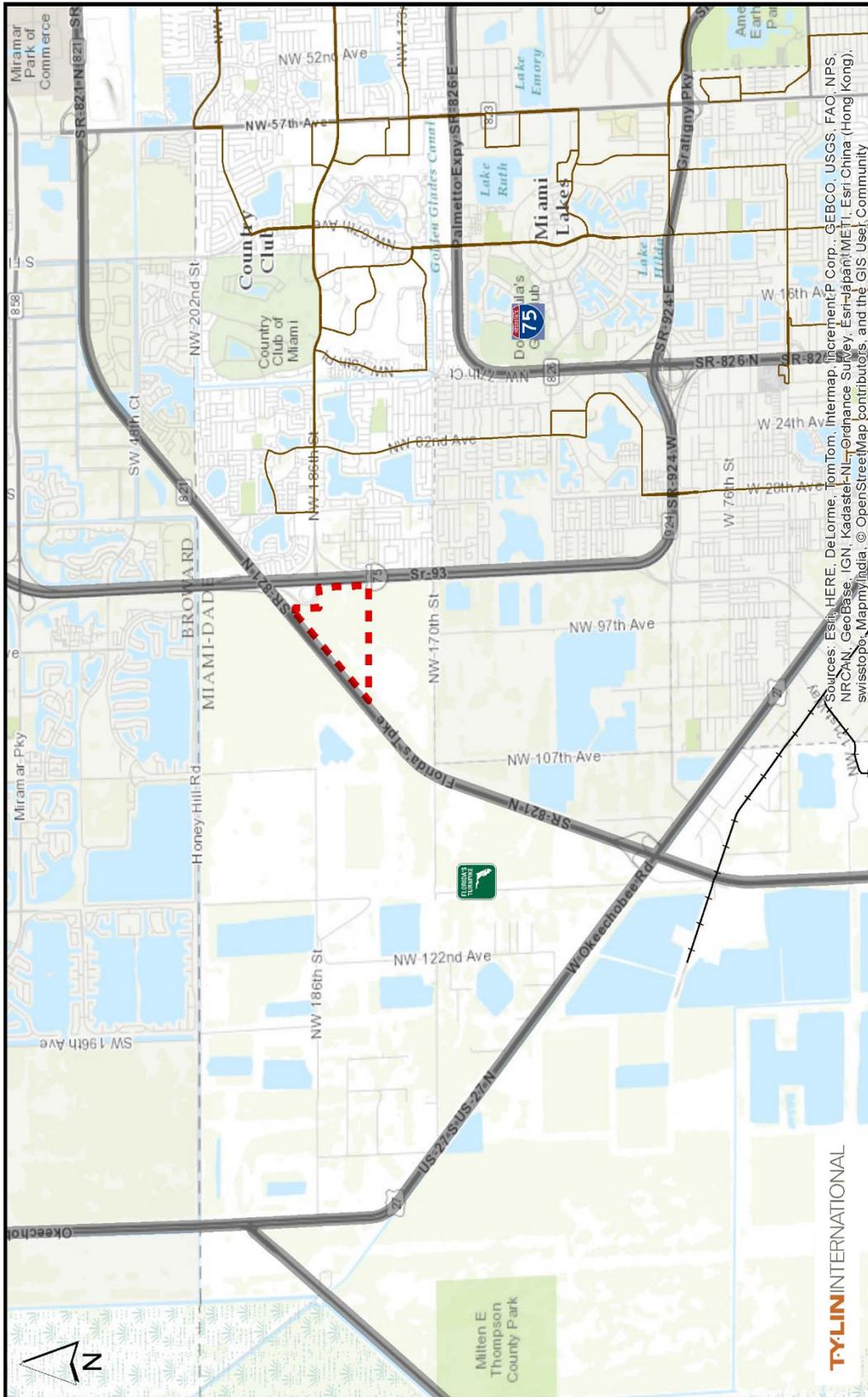


Map I
Floodplains
American Dream Miami
October 2015

Legend Source: Federal Emergency Management Agency, 2013

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

TYLININTERNATIONAL



Legend

- Existing Railway
- Existing Bus Route
- Florida Intrastate Highway System
- Site Boundary

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

QUESTION 10 - GENERAL PROJECT DESCRIPTION

Part 1 Specific Project Description

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

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

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

Table 10-1 contains the overall program for development:

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

Table 10-1: Breakdown of Development Program.

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



Figure 10-1: American Dream Miami Development Location

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

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

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

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

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

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

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

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

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

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

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

F. Describe, in general terms, the Development Costs.

International Atlantic, LLC estimates that it will cost a total of \$4.0 billion to develop American Dream Miami, including \$3.2 million in terms of hard costs (materials and labor) and \$800.0 million for soft costs including architectural and engineering fees, building permit and impact fees, project overhead, promotional costs, leasing commissions, etc. The above estimate of project costs does not include the moneys that may need to be expended for off-site infrastructure improvements that may be required to support that project. Cost estimates for such off-site improvements are currently not available.

As indicated above, the estimate of soft costs includes the impact fees that project will need to pay for roads, police and fire. Utilizing Miami-Dade County’s impact fee

schedule and assuming the total of 6.2 million square feet of retail and entertainment are considered retail space for the purpose of calculating impact fees, it is estimated that road impact fees in excess of \$110.0 million will potentially need to be paid. The impact fees paid for fire and police may potentially equal \$3.35 million and \$2.83 million, respectively. However, the actual amount that will be paid will be dependent on the extent to which the project receives credits for infrastructure improvements, if any, that are directly funded by International Atlantic, LLC.

Based on the County's current building permit fee schedule, it is further estimated that the proposed project will need to pay \$895,280 in general building permit fees. Additional trade-related building permit fees will need to be paid by roofing, plumbing, electrical, structural and mechanical contractors involved in building the project. However, the plans for the project are not sufficiently detailed at this time to allow estimates of these trade-related building permit fees to be formulated with specificity. The plans for the project are also not sufficiently detailed at this time to estimate the amounts that will need to pay in water and sewer connection fees.

EXISTING AND PROPOSED LAND USES

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

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

Part 2 Consistency with Comprehensive Plans

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

Please refer to the CDMP Application Document.

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

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

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

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

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

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

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

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

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

Part 3 Demographic and Employment Information

A. Complete the following Demographic and Employment Information tables.

American Dream Miami will include no residential uses; accordingly, Table 10.3.1 has not been prepared. Table 10.3.2, immediately below, provides information on the estimated employment at the project both during the period in which it is being developed and on a permanent basis after construction is completed. For the purpose of this table, construction employment is expressed in terms of the total number of worker-years of employment that will required to complete the proposed project during the three-year period in which it will be constructed in its entirety, which is assumed to extend from 2017 to late 2019. The estimate of permanent employment represents the number of workers that will be employed on-site annually on a full-time equivalent (FTE) basis in its first full year of operations, which is assumed to be 2020. However, it is likely that more people will work on-site annually than the number of FTE's shown because part-time workers comprise significant percentages of the people employed in the retail, food and beverage, entertainment and hospitality industry sectors. The table further assumes that all the construction workers as well as all the FTE's employed on a permanent basis annually will earn wages and salaries at or above minimum wage which currently equates to \$16,744 in the State of Florida for workers who record 40 hours a week for 52 weeks a year.

Table 10.3.2							
Estimated Employment by Income Range							
American Dream Miami							
(2014 Dollars)							
Type of Employment	\$16,744 – \$19,999**	\$20,000 – \$24,999	\$25,000 – \$29,999	\$30,000 – \$34,999	\$35,000 – \$39,999	\$40,000 or more	Total
Construction***	150	100	173	400	500	21,700	23,023
Permanent ****	4,677	4,563	2,419	1,396	387	1,088	14,530

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

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

The above estimate of workers-years of construction employment assumes that it will cost \$3.2 billion to construct American Dream Miami in terms of hard costs (material and labor). This figure does not include the cost of off-site infrastructure improvements that may be required but for which no estimates are currently available. It further assumes that 45 percent of the stated

amount, or \$1.44 billion will be expended in the form of wages and salaries with the remainder being spent on materials. Finally, it assumes that the average construction worker building a non-residential project in Miami-Dade County will earn \$62,545. This figure is consistent with the data shown for NAICS Code 2362 in the Annual Census of Employment and Wages for Miami-Dade County for 2014, which is the most current annual wage data issued by the Florida Department of Economic Opportunity.

The above estimate of the number of FTE's that will be employed at the American Dream Miami on an annual basis assumes that all but 20,000 of the 3.5 million square feet of retail space will house 2.5 employees per 1,000 square feet, a ratio consistent with industry averages for high-volume retail facilities. A ratio of 4 employees per 1,000 square feet was assumed for the 20,000 square feet of retail space that is expected to be occupied by banks (NAICS code 522). In the absence of data from facilities comparable to the 1.5 million square feet of entertainment space, the ratio of 2.5 employees per 1,000 square feet was also applied to that use. Employment for the proposed hotels was estimated at 0.75 workers per room. This figure is also consistent with industry averages for full-service lodging units, which is the type being proposed. Finally, based on discussions with a representative of the Applicant, it was assumed that approximately 500 people would be employed at American Dream Miami in facility support services (NAICS Code 5612) to operate the entertainment retail, itself. This portion of the on-site workforce will include property management, leasing and promotional personnel as well as maintenance, security and janitorial personnel and parking attendants. The table below shows the distribution of permanent FTE's by NAICS Code as well as the average earnings of the workers in each NAICS Code based on data contained in the Annual Census of Employment and Wages for Miami-Dade County in 2014.

Distribution of Permanent Workforce FTE's			
By			
Industry Sector and NAICS Code			
American Dream Miami			
Industry Sector	NAICS Code	Employees (FTE's)	Average Annual Earnings
Retail Space			
Furniture and Home Furnishings	442	375	\$34,696
Electronics and Appliances	443	250	\$40,547
Specialty Food Stores	4452	125	\$24,025
Health and Personal Care	446	250	\$33,350
Clothing	4481	2,500	\$21,961
Shoes	4482	625	\$20,628
Jewelry, Leather Goods and Luggage	4483	250	\$39,568
Sports, Hobbies, Musical Instruments, Books	451	175	\$21,479
Department Stores	4521	2,875	\$21,377

Miscellaneous Store Retailers	453	125	\$30,614
Credit intermediaries (Banks)	522	80	\$79,248
Fitness Center	7139	112	\$23,350
Food and Beverage	722	850	\$21,561
Personal Services	8121	188	\$24,677
Subtotal		8,780	
Entertainment Space	713	3,750	\$25,374
Hotels	7211	1,500	\$32,775
Facilities Support Services	5612	500	\$32,324
Total		14,530	
Source: Annual Census of Employment and Wages for Miami-Dade County, 2014; Miami Economic Associates, Inc.			

With respect to the average wage information provided above, two points should be noted, as follows:

- The distribution of employment by NAICS code for retail space is based on a review of the tenant mix at the Mall of Americas in the Minneapolis/St. Paul metropolitan area, which was developed by the Applicant, and the Aventura Mall. It is provided for illustrative purposes; however, the actual distribution once American Dream Miami commences operations may be different and the variances could be significant.
- The Annual Census of Employment and Wages does not account for gratuity income of food and beverage workers, personal service workers, parking attendants, etc.
- The average figure takes into account the earnings full-time workers as well as that portion of part-time workers who are eligible for unemployment insurance. The inclusion of part-time workers probably understates the incomes of FTE's.

Part 4 Impact Summary

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

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

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

PUBLIC FACILITY IMPACTS (1)

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

QUESTION 11 - REVENUE GENERATION SUMMARY

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

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

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

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

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

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December 14, 2015

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

**Re: Application to Amend the Miami-Dade County CDMP
Filed by International Atlantic, LLC
November 2015 Cycle**

Dear Mr. Osterholt:

Miami Economic Associates, Inc. (MEAI) has analyzed the above-captioned application to amend the Miami-Dade County Comprehensive Development Master Plan (CDMP) in order to evaluate whether its request to re-designate approximately 194.5 gross acres of land in northwestern portion of Miami-Dade County from Industrial and Office to Business and Office merits approval. The property referenced by the application is located east of the Homestead Extension of Florida's Turnpike (HEFT) and west of Interstate 75 and extends from NW 180th Street northward to the intersection of the Interstate and the HEFT. The purpose of the proposed amendment is to allow for the development of a proposed project, to be known as the American Dream Miami, that will be comprised of 3.5 million square feet of retail space, 1.5 million square feet of entertainment space and 2,000 hotel rooms together with common areas, parking facilities and "back of the house" spaces.

The analysis contained in this report was undertaken in accordance with CDMP Land Use Policy 8E that states in part that applications requesting to amend the CDMP Land Use Map shall be evaluated to consider consistency with the Goals, Objectives and Policies of all Elements (of the CDMP) and other timely issues. It also enumerates other factors that should be considered including "the extent to which the proposal if approved would satisfy a deficiency in the Plan Map to accommodate projected population or economic growth of the County." In this regard, we also considered CDMP Land Use Policy LU-8F which states in part that "the adequacy of non-residential land supplies shall be determined on the basis of land supplies in subareas of the County appropriate to the type of use, as well as the Countywide supply within the UDB."

The purpose of this letter report is to apprise you of the findings of our analysis.

Summary of Findings

MEAI believes that the subject application should be approved based on the following findings of our analysis:

- The Applicant, International Atlantic, LLC, is an affiliate of Triple Five Worldwide, a development company with offices in the United States, Canada and elsewhere globally that develops and operates mega shopping and entertainment complexes. Its projects include the world-renowned Mall of the Americas in the Minneapolis/St. Paul metropolitan area and the West Edmonton Mall in Alberta, Canada. The former is the largest mall in the United States while the latter is the largest mall in North America. Triple Five is currently developing a project which will be known as the American Dream New York adjacent to Met Life Stadium in the Meadowlands area of northern New Jersey. When completed, that project, which is scheduled to open in late 2016, is expected to attract 40 million visitors annually from throughout the New York Metropolitan Area and will essentially be a prototype for American Dream Miami project.
- As discussed above, American Dream Miami project will contain 3.5 million square feet of retail space, 1.5 million square feet of entertainment space, 2000 hotel rooms as well as common areas, parking and “back of the house” space. The proposed retail space is expected to include four to six department store anchors that will occupy approximately one-third of the the total retail space. The retail space will also contain approximately 340,000 square feet of food and beverage space and in-line shops offering a wide range of shoppers goods including apparel, furniture and home furnishings, electronics, health and beauty products, jewelry and accessories, sporting goods, luggage, specialty food products, etc. Personal service establishment such as hair and nail salons will also be represented in the tenant mix. Preliminary plans for the proejct indicate that the entertainment space will include a number of indoor facilities including a ski slope, an ice skating rink, a water park, a sea lion habitat, a theme park and a miniature golf course as well as a theater for live theatrical and performing arts performances and a multi-screen cinema. Other entertainment venues may include an observation (ferris) wheel and a submarine pool. The Applicant proposes develop the project in one phase and is expecting it to open in late 2019, assuming a ground breaking in early 2017.

According to information provided to MEAI by the Applicant, the project is expected to attract in excess of 30 million visitors annually and record in excess of \$1.5 billion in sales revenue. It is anticipated that more than half of the patrons will be tourists to South Florida from both domestic and international points of origin. The project's proximity to both Miami Internation Airport and Fort Lauderdale Hollywood International Airport will be an asset in this regard. These tourists are expected to account for more than half the sales at American Dream Miami. It is anticipated that they will also spend significant amounts of money off-site during their visit to South Florida. Accordingly, they will infuse significant amounts of money from outside the area into South Florida economy generally and Miami-Dade County, specifically. The

remainder of the visitors to American Dream Miami will be drawn from throughout Miami-Dade and Broward Counties, with greatest number being likely living in northern Miami-Dade County and southern Broward County.

- Review of the preliminary site plan for the American Dream Miami indicates that the project as proposed will require the entirety of the approximately 194.5 acres that are the subject of the application filed on behalf of International Atlantic LLC. According to data compiled by the Planning Division of the Miami-Dade County Department of Regulatory and Economic Resources in December, 2015, there are currently 2,463.0 vacant acres of land designated for commercial uses countywide including retail and office development. Of that total, 734.3 vacant commercial acres are located in the Northern Planning Tier, including 211.1 acres in MSA 3.1. The data further shows that only six of the County's 30 urbanized MSA's currently have more than 194.5 vacant commercial acres. In addition to MSA 3.1, they include MSA's 2.3, 3.2, 6.2, 7.4 and 7.5.

Review of the County's current land use map in conjunction with the County Property Appraiser's website shows that there no individual vacant parcels or assemblages of vacant parcels in MSA 3.1 or the other five MSA's enumerated above that are comprised of as many as 194.5 acres. Further, there are no large vacant parcels or assemblages of parcels that have access to highways comparable to the proposed site, given its location between the HEFT and Interstate 75. The proposed site's excellent highway access is critical for American Dream Miami to be able to accommodate more than 30 million visitors on a yearly basis.

Accordingly, MEAI believes that the proposed re-designation of the proposed site of the American Dream Miami from Industrial and Office to Business and Office is merited. It will satisfy a deficiency of the County's Plan Map appropriate to the proposed use --- that is, a lack of large commercial sites with excellent highway access . In so doing, it will enable the development of a project which will enhance Miami-Dade County as a tourism destination and result in the infusion of significant amounts of outside money into the the County's economy. As will be discussed further below, the project is expected to employ more than 14,500 people annually on a full-time equivalent basis and be highly beneficial fiscally to Miami-Dade County and the other governmental jurisdictions in which it is located.

- MEAI recognizes that re-designation of the American Dream Miami site will reduce the amount of vacant designated for industrial and Office use in Miami-Dade County overall as well as the County's Northern Planning Tier and MSA 3.1. In this regard, the following points are noted:
 - According to data compiled by the Planning Division of the Miami-Dade County Department of Regulatory and Economic Resources in December, 2015, there are currently 3,766.8 acres of vacant land designated for Industrial and Office use in Miami-Dade County. That information further estimates that the land so-designated throughout the County is being absorbed at a rate of 158.14 acres

per year, which means that the vacant acreage would not be fully depleted until approximately 2040, or ten years after the County's current planning horizon of 2030. Re-designation of the approximately 194.5 acres proposed as the site of the American Dream Mall would only shorten the countywide depletion period by 1.23 years, or to 2038. Further, if both the subject application and an application also submitted in the November 2015 Cycle by The Graham Companies with respect to 339 acres immediately south of the American Dream Miami site are adopted, the result would be the re-designation of a total of 533.5 acres from Industrial and Office to Business and Office use. MEAI estimates that even in that case, the remaining supply of vacant land designated for Industrial and Office use would not be depleted until approximately 3036, or 6 years beyond the current 2030 planning horizon.¹

- The data referenced in the preceding paragraph further shows that there are a total of 1,626.7 vacant acres of land designated for Industrial and Office use in the County's Northern Planning Tier. Approximately 85 percent of them, 1,381.8 acres, are in MSA 3.1, which also comprises the western sub-tier of the Northern Planning Tier. All but 5.5 of the remaining 244.9 vacant acres in the Northern Planning Tier are located in MSA 2.4. The data compiled by the Planning Division indicates that at a total of 31.83 acres of land designated for Industrial and Office use are absorbed annually in the the Northern Planning Tier, including 16.08 acres in MSA 3.1. On this basis, the supply of vacant land designated for Industrial and Office use in the Northern Tier would not be fully depleted for more than 50 years while that in MSA 3.1 for nearly 86 acres. In both instances the depletion period would be well beyond the County's current planning horizon in 2030. Accordingly, even if both the subject application and the one filed by The Graham Companies are approved, resulting in the reduction of 533.5 acres from the supply of vacant land designated for Industrial and Office use, the remaining supply of land so-designated in the Northern Planning Tier and MSA 3,1 would still not be depleted until well beyond 2030.
 - Finally, MEAI recognizes that development of the American Dream Miami site with industrial and office uses could ultimately infuse money into the economy of Miami-Dade County, However, even if does, it is unlikely to do so in as great an amount as the proposed mall will. MEAI also anticipates that the impact of American Dream Miami will be realized more quickly since it will be developed in a single phase that is expected to be completed by late 2019. Development of the site with industrial uses will occur on a phased basis over a number of years that are likely to extend well beyond 2019.
- As discussed above, applications to amend the CDMP Land Use Map shall be

¹ While The Graham Companies are seeking to have 339 acres re-designated to Business and Office Use, they plan to still develop significant amounts of office and industrial space on their property. However, that space will be developed in combination with hospitality, retail and residential uses as part of Employment Center rather than on a stand-alone basis.

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evaluated based on consistency in the Goals, Objectives and Policies of all the Elements of the CDMP. In the application filed on behalf of International Atlantic, LLC, notice is made of a number of policies that the application furthers including Land Use Policies LU-1A and LU-1B which encourage high intensity urban centers to developed at locations having high countywide multimodal accessibility. As discussed above, American Dream Miami will be located between and accessible from the HEFT and Interstate 75. It will also be accessible from the proposed Palmetto Express Bus route that will that run from the intersection of Interstate 75 and NW 186th Street to the Palmetto Metrorail Station.

Of particular relevance in MEAI's opinion to American Dream Miami is Economic Policy ECO-7A, which states in part that Miami-Dade County's strategy for meeting countwide employment needs for the next several years should be to emphasize its strengths in, among other sectors, the visitor industry. American Dream Miami will provide permanent job opportunities for more 14,500 workers on a FTE basis in its first full year of operations.² MEAI estimates that these workers will earn nearly \$375.0 million annually (2014 Dollars). Appendix A, which contains supplemental materials submitted with the application to amend the CDMP, provides additional information about the permanent employees at American Dream Miami and the bases of MEAI's estimate of permanent employment. The Appendix also contains information with respect to the construction employment associated with the proposed project. Assuming the project costs \$3.2 million to construct in terms "hard" costs, it is expected that \$1.44 billion will be spent on labor. This amount would be sufficient to pay for more than 23,000 worker-years of labor at an average level of \$62,550 per year (2014 Dollars). Finally, it is noted that the Applicant is committed to providing significant employment opportunities through the County's Small Business Enterprise Architectural and Engineering program and the County's Small Business Enterprise Construction Services program.

- In addition to positively impacting the economy of Miami-Dade County, the development of American Dream Mall will be highly beneficial to the County fiscally on a non-recurring basis during the development period and on an annual recurring basis once development is completed and the project commences operations. Other governmental jurisdictions in which it will be located will also benefit fiscally from American Dream Miami, including the Miami-Dade County Public School District, the Children's Trust and the State of Florida. The materials that follow describe the fiscal benefits that the project will generate.
 - During the period in which the American Dream Mall is being developed, impact fees will be paid for roads, police and fire. Based on the proposed development program and the schedule of impact fee rates currently in effect, MEAI estimates that the road impact fees that will need to be paid will potentially total in excess of \$110.0 million. Fire impact fees in the amount of

² The actual number of people employed at the American Dream Mall on an annually basis is likely to exceed the number of FTE's since significant percentages of workers in the retail, food and beverage, hospitality and entertainment industry sectors.

\$3.35 million and police impact fees in the amount of \$2.83 million may also be paid. The actual amount that will be paid will be dependent on the extent to which the project receives credits for infrastructure improvements that International Atlantic, LLC directly funds to support the project, if any.

In addition to impact fees, it is estimated, based on the current fee schedule, that the project will need to pay \$895,280 in general building permit fees. It will also need to pay trade-related building permit fees on the work performed by its roofing, electrical, plumbing, structural and mechanical contractors. However, at this time, the plans for the project are not sufficiently detailed to estimate those fees with specificity. There is also insufficient data available currently to estimate the amount of water and sewer connection fees that will need to be paid.

- With respect to recurring fiscal benefits, a report prepared by Munilytics, a Davie-based firm that specializes in performing fiscal impact analyses for proposed projects, conservatively estimates that American Dream Mall will add \$1.36 billion to the tax rolls of Miami-Dade County and the other jurisdictions in which the project will be located including the Miami-Dade Public School District, the Children's Trust and the State of Florida. A copy of Munilytics' report was submitted as part of the supplemental materials that accompanied the amendment application and is also provided in Appendix B. The report estimates that American Dream Miami will generate more than \$13.27 million annually in ad valorem taxes for Miami-Dade County as well as more than \$10.35 million for the Public School District and \$680,000 for the Children's Trust. The distribution of the ad valorem taxes that Miami-Dade County is expected to collect annually by fund is shown below:

Fund	Amount
General Fund	\$ 6,346,900
Debt Service Fund	\$ 612,001
Fire Fund	\$ 3,292,155
Fire Debt Service Fund	\$ 11,696
Library Fund	\$ 386,240
UMSA Fund	\$ 2,622,490
Total	\$ 13,271,482

Source: Munilytics

American Dream Miami is also expected to generate more than \$23.7 million annually in non-ad valorem revenues for Miami-Dade County as shown at the top of the next page:

Mr. Jack Osterholt, Director
Department of Regulatory and Economic Resources
Miami-Dade County
December 14, 2015
Page 7

Revenue Source	Amount
Franchise Fees and Utility Taxes	\$ 1,637,338
Stormwater Fees	\$ 183,953
Communication Service Tax	\$ 228,739
Local Option Sales Tax	\$ 16,009,000
Tourism Tax	\$ 4,599,000
Business Tax Receipts	\$ 13,233
Annual Water & Sewer Utility Profit	\$ 1,032,662
Total	\$ 23,703,915

Source: Munitytics

American Dream Miami is also expected to generate more than \$79.3 million annually in sales tax revenue once it commences operations. Sales tax will also need to be paid on at least a portion of the \$1.76 billion spent on materials used to construct the project; however, there is insufficient data currently available to estimate that amount.

Closing

In summary, MEAI believes that the CDMP application filed by International Atlantic, LLC should be approved because it will satisfy a deficiency on the Plan Map, thereby enabling American Dream Miami to be developed. Development of the project will be highly beneficial to Miami-Dade County economically and fiscally.

Sincerely,
Miami Economic Associates, Inc.



Andrew Dolkart
President

Appendix A

Question 10, Part 3

American Dream Miami will include no residential uses; accordingly, Table 10.3.1 has not been prepared. Table 10.3.2, immediately below, provides information on the estimated employment at the project both during the period in which it is being developed and on a permanent basis after construction is completed. For the purpose of this table, construction employment is expressed in terms of the total number of worker-years of employment that will be required to complete the proposed project during the three-year period in which it will be constructed in its entirety, which is assumed to extend from 2017 to late 2019. The estimate of permanent employment represents the number of workers that will be employed on-site annually on a full-time equivalent (FTE) basis in its first full year of operations, which is assumed to be 2020. However, it is likely that more people will work on-site annually than the number of FTE's shown because part-time workers comprise significant percentages of the people employed in the retail, food and beverage, entertainment and hospitality industry sectors. The table further assumes that all the construction workers as well as all the FTE's employed on a permanent basis annually will earn wages and salaries at or above minimum wage which currently equates to \$16,744 in the State of Florida for workers who record 40 hours a week for 52 weeks a year.

Table 10.3.2 Estimated Employment by Income Range American Dream Miami (2014 Dollars)							
Type of Employment	\$16,744 – \$19,999**	\$20,000 – \$24,999	\$25,000 – \$29,999	\$30,000 – \$34,999	\$35,000 – \$39,999	\$40,000 or more	Total
Construction***	150	100	173	400	500	21,700	23,023
Permanent ****	4,677	4,563	2,419	1,396	387	1,088	14,530

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

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

The above estimate of workers-years of construction employment assumes that it will cost \$3.2 billion to construct American Dream Miami in terms of hard costs (material and labor). This figure does not include the cost of off-site infrastructure improvements that may be required but for which no estimates are currently available. It further assumes that 45 percent of the stated amount, or \$1.44 billion will be expended in the form of wages and salaries with the remainder being spent on materials. Finally, it assumes that the average construction worker building a non-residential project in Miami-Dade County will earn \$62,545. This figure is consistent with the data shown for NAICS Code 2362 in the Annual Census of Employment and Wages for Miami-Dade County for 2014, which is the most current annual wage data issued by the Florida Department of Economic Opportunity.

The above estimate of the number of FTE's that will be employed at the American Dream Miami on an annual basis assumes that all but 20,000 of the 3.5 million square feet of retail space will house 2.5 employees per 1,000 square feet, a ratio consistent with industry averages for high-volume retail facilities. A ratio of 4 employees per 1,000 square feet was assumed for the 20,000

square feet of retail space that is expected to be occupied by banks (NAICS code 522). In the absence of data from facilities comparable to the 1.5 million square feet of entertainment space, the ratio of 2.5 employees per 1,000 square feet was also applied to that use. Employment for the proposed hotels was estimated at 0.75 workers per room. This figure is also consistent with industry averages for full-service lodging units, which is the type being proposed. Finally, based on discussions with a representative of the Applicant, it was assumed that approximately 500 people would be employed at American Dream Miami in facility support services (NAICS Code 5612) to operate the entertainment retail, itself. This portion of the on-site workforce will include property management, leasing and promotional personnel as well as maintenance, security and janitorial personnel and parking attendants. The table below shows the distribution of permanent FTE's by NAICS Code as well as the average earnings of the workers in each NAICS Code based on data contained in the Annual Census of Employment and Wages for Miami-Dade County in 2014.

Distribution of Permanent Workforce FTE's By Industry Sector and NAICS Code American Dream Miami			
Industry Sector	NAICS Code	Employees (FTE's)	Average Annual Earnings
Retail Space			
Furniture and Home Furnishings	442	375	\$34,696
Electronics and Appliances	443	250	\$40,547
Specialty Food Stores	4452	125	\$24,025
Health and Personal Care	446	250	\$33,350
Clothing	4481	2,500	\$21,961
Shoes	4482	625	\$20,628
Jewelry, Leather Goods and Luggage	4483	250	\$39,568
Sports, Hobbies, Musical Instruments, Books	451	175	\$21,479
Department Stores	4521	2,875	\$21,377
Miscellaneous Store Retailers	453	125	\$30,614
Credit intermediaries (Banks)	522	80	\$79,248
Fitness Center	7139	112	\$23,350
Food and Beverage	722	850	\$21,561
Personal Services	8121	188	\$24,677
Subtotal		8,780	
Entertainment Space			
	713	3,750	\$25,374
Hotels			
	7211	1,500	\$32,775
Facilities Support Services			
	5612	500	\$32,324
Total		14,530	
Source: Annual Census of Employment and Wages for Miami-Dade County, 2014; Miami Economic Associates, Inc.			

With respect to the average wage information provided above, two points should be noted, as follows:

- The distribution of employment by NAICS code for retail space is based on a review of the tenant mix at the Mall of Americas in the Minneapolis/St. Paul metropolitan area, which was developed by the Applicant, and the Aventura Mall. It is provided for illustrative purposes; however, the actual distribution once American Dream Miami commences operations may be different and the variances could be significant.
- The Annual Census of Employment and Wages does not account for gratuity income of food and beverage workers, personal service workers, parking attendants, etc.
- The average figure takes into account the earnings full-time workers as well as that portion of part-time workers who are eligible for unemployment insurance. The inclusion of part-time workers probably understates the incomes of FTE's.

Appendix B

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

Miami Dade County, Florida

October 5, 2015



Report Commission

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

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



Study Conclusions

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

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

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



Fiscal Impact To Political Subdivisions

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

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

(continued)



Table A
Summary of Annual Revenues
Various Taxing Authorities

	Use	Number of Units	Or Square Footage	Assumed Number of Structures	Taxable Value	Property taxes	Stormwater Fee	Electric Franchise Taxes	Garbage Franchise Taxes
Retail	Retail		3,500,000	1.00	790,870,390	14,441,372	108,527.13	293,676.07	0.00
Theme Park	Appurtenant		370,000	1.00	37,000,000	675,624	11,472.87	7,761.44	0.00
Water Park	Appurtenant		370,000	1.00	37,000,000	675,624	0.00	7,761.44	0.00
Tivoli Garden	Appurtenant		35,000	1.00	3,500,000	63,910	1,085.27	2,936.76	0.00
Submarine Lake	Appurtenant		110,000	1.00	11,000,000	200,861	0.00	2,307.45	0.00
Art Deco Village	Appurtenant		120,000	1.00	12,000,000	219,121	3,720.93	10,068.89	0.00
Movie Theaters	Movie Theater	1,400	35,000	1.00	11,405,946	208,274	1,085.27	2,936.76	0.00
Live Venue Theater	Live Venue Theater	1,000	25,000	1.00	8,147,105	148,767	775.19	2,097.69	0.00



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

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

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

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

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



Property Tax Base

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

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

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

Stormwater Fees

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

Franchise and Utility Taxes

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



Intergovernmental Revenue

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

Local Option Sales Tax

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

Tourism Tax

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

Business Tax Receipts

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

Utility Profits

The County operates a water and sewer utility system. This system is operated on a proprietary, or for profit, basis. Much of the County's costs of operating its utility system are fixed costs. We used the County's last audited comprehensive annual financial report to calculate the



operating margin for water to be 39.5% for water and sewer. Based on our estimates of consumption (itself derived from use) we estimate that the County would net \$1,032,662 annually.



QUESTION 12 VEGETATION AND WILDLIFE

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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



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United States Department of the Interior



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

Consultation Code: 04EF2000-2016-SLI-0003

October 06, 2015

Event Code: 04EF2000-2016-E-00011

Project Name: American Dream Miami

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

To Whom It May Concern:

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

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

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

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

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

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

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

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

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

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

Official Species List

Provided by:

South Florida Ecological Services Field Office
1339 20TH STREET
VERO BEACH, FL 32960
(772) 562-3909
<http://fws.gov/verobeach>

Consultation Code: 04EF2000-2016-SLI-0003

Event Code: 04EF2000-2016-E-00011

Project Type: DEVELOPMENT

Project Name: American Dream Miami

Project Description: Entertainment Complex

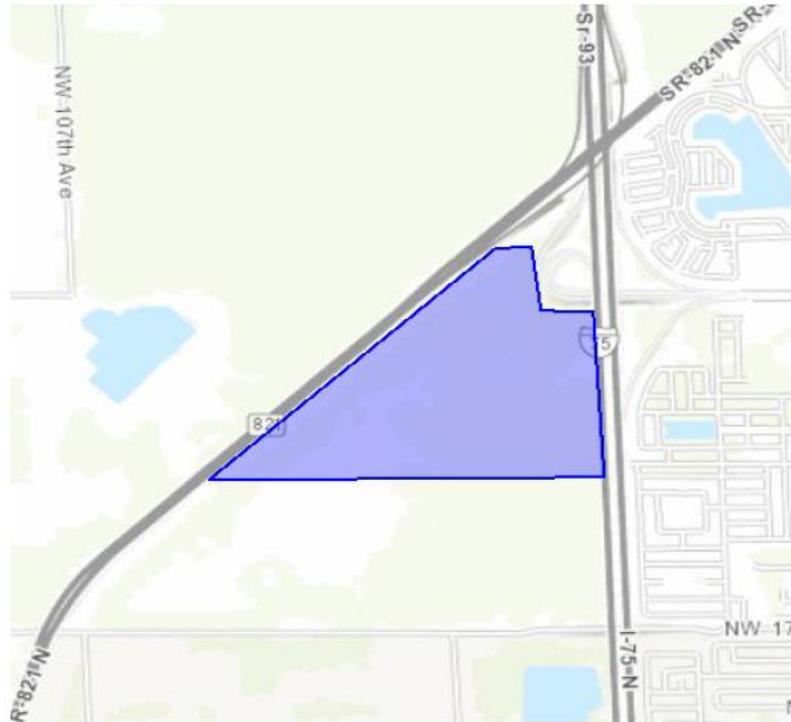
Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your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



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

Project Location Map:



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

Project Counties: Miami-Dade, FL



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

Endangered Species Act Species List

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

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

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United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

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

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United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

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

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United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

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



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

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



United States Department of Interior
Fish and Wildlife Service

Project name: American Dream Miami

Critical habitats that lie within your project area

There are no critical habitats within your project area.

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QUESTION 13 WETLANDS

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

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

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

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

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

Table 13.1 – Vegetative Coverage

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

* Historic wet prairie (FLUCCS 643)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

part of the regulatory approval process.

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

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

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

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

8. If available, provide jurisdictional determinations.

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

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

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

QUESTION 14 - WATER

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

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

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

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

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

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

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

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

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

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

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

QUESTION 15 SOILS

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

Soil Description and Interpretations

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

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

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

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

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

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

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

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

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

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

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

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

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

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



QUESTION 16 - FLOODPLAINS

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

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

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

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

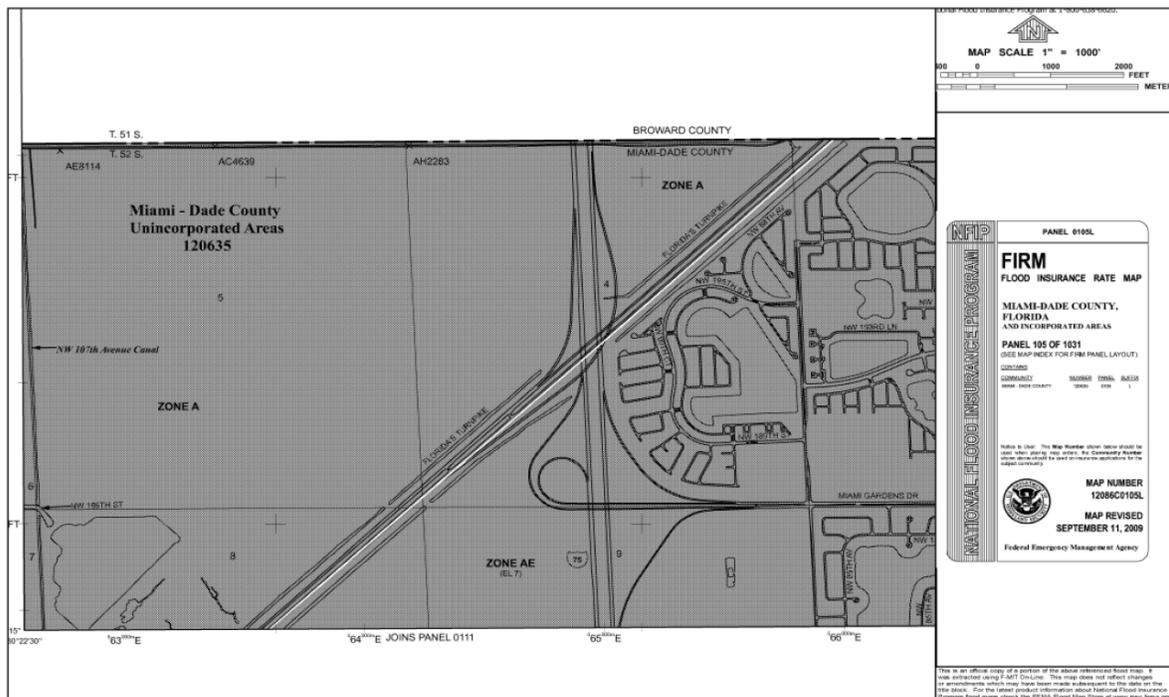


Figure 16-1: FEMA FIRM map for development area.

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

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

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

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

QUESTION 17 - WATER SUPPLY

A.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Exhibit 17-1

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

miamidade.gov

July 29, 2015

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

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

Ladies and Gentlemen:

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

WATER: The developer shall connect as follows:

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

OR

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

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

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

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

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

OR

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

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

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

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

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

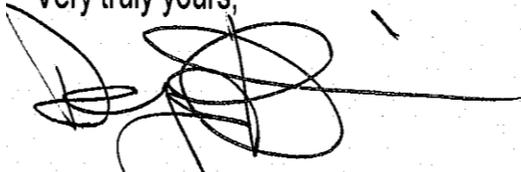
The developer is hereby advised that the subject property falls within a designated protected wetland area. The developer is not authorized to commence any work or activities pursuant to this permit until the developer obtains any and all approvals or permits, if necessary, from the County's Department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

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

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

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

Very truly yours,

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

Douglas Pile, Esq.
New Business Section

QUESTION 18 - WASTEWATER MANAGEMENT

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

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

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

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

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

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

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

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

C.

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

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

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

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

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

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

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

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

QUESTION 19 - STORMWATER MANAGEMENT

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

QUESTION 20 - SOLID WASTE/HAZARDOUS WASTE/MEDICAL WASTE

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

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

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

Notes:

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

- B.

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

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

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

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

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

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

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

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

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

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

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

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

Exhibit 20-1



November 1, 2015

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

RE: American Dream Miami Project

Dear Mr. Gorlow,

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

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

Sincerely,

Susie Vega

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

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

PART IV. TRANSPORTATION RESOURCE IMPACTS

QUESTION 21 - TRANSPORTATION

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

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

INTERNAL/EXTERNAL SPLIT - VEHICLE TRIPS

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

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

QUESTION 22 – AIR

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

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

- B. Specify structural or operational measures that will be implemented by the development to minimize air quality impacts (e.g., road widening and other traffic flow improvements on existing roadways, etc.). Any roadway improvements identified here should be consistent with those utilized in Question 21, Transportation.**

The Amendment Site is fortunate to be surrounded by regional roadway network improvements that are programmed and/or planned in TIP 2016 and LRTP 2040 to add regional roadway network capacity to Florida's Turnpike, Interstate-75 and SR-826. To compliment the regional network improvements, the development will provide additional roadway and interchange improvements to improve access to the site and to address network capacity on adjacent local roadways to accommodate project impacts. A preliminary listing of the roadway and interchange improvements which are currently under review to provide access to the amendment site are outlined below. The final determination of required roadway and interchange improvements will be made during the agency review and approval process for the CDMP Amendment Transportation Analysis.

- Site Access Improvements:
- New Turnpike Interchange at HEFT and NW 170 Street
- Construction of NW 170 Street between HEFT and NW 97 Avenue
- Construction of NW 178 Street between NW 102 Avenue and I-75
- Construction of NW 97 Avenue from NW 154 Street to NW 178 Street
- Construction of NW 102 Ave. from NW 170 St. or NW 178 St. to NW 186 St.
- Modified Interchange at I-75 and NW 186 Street / Miami Gardens Drive

- C. Complete Table 22-1 for all substantially impacted intersections within the study area, as defined in Map J, and all parking facilities associated with the project. Using the guidance supplied or approved by the Florida Department of Environmental Regulation, determine if detailed air quality modeling for carbon monoxide (CO) is to be completed for any of the facilities listed in the table.**

Detailed information on impacted intersections as well as surface and structured parking areas will be provided during the zoning and/or site plan approval and permitting process (if requested and/or required by reviewing agencies). After the CDMP Amendment Transportation Analysis has been reviewed and determined to be sufficient, the Applicant will meet with MD-RER and FDEP to identify applicable guidelines and to identify those study intersections and parking facilities which are anticipated to be substantially impacted by project traffic. As part of the DRI process, FDEP guidelines require that the following be considered for air quality modeling:

- LOS E and F intersections impacted by 5% or more of project traffic;
- Surface parking areas accommodating 1500 vehicle trips per hour; or
- Parking garages accommodating 750 vehicle trips per hour.

- D. If detailed modeling is required, estimate the worst case one-hour and eight-hour CO concentrations expected for each phase through buildout for comparison with the state and federal ambient air quality standards. Utilize methodology supplied or approved by the Florida Department of Environmental Regulation for making such estimates. Submit all air quality modeling input and output data along with associated calculations to support the modeling and explain any deviations from guidance. Provide drawings of site geometry and coordinate information for each area modeled. Show the location of the sources and receptor sites. Modeling assumptions should consider federal, state, and local government programmed link and intersection improvements with respect to project phasing. Any roadway improvements utilized in the model should be consistent with those used in Question 21, Transportation. Provide verification of any assumptions in the modeling which consider such programmed improvements. It is recommended that air quality analyses be completed concurrently and in conjunction with the traffic analyses for the project.**

If applicable, this information will be provided after the CDMP Amendment Transportation Analysis has been reviewed and determined to be sufficient, and the Applicant has met with MD-RER and FDEP to determine which intersections and parking facilities need to be modeled and have established parameters for the carbon monoxide analysis.

- E. If initial detailed modeling shows projected exceedance(s) of ambient air quality standards, identify appropriate mitigation measures and provide assurances that appropriate mitigating measures will be employed so as to maintain compliance with air quality standards. Submit further modeling demonstrating the adequacy of such measures.**

This information will be provided after the CDMP Amendment Transportation Analysis has been reviewed and determined to be sufficient, and the modeling (if applicable) has been completed.

QUESTION 23 - HURRICANE PREPAREDNESS

A.

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

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

In April of 2013, the Miami-Dade County Department of Emergency Management updated their Hurricane Evacuation Map which provides Hurricane Storm Surge Planning Zones across Miami-Dade County (categorized as Planning Zones A through E) which are depicted on attached **Exhibit 23-1**. The Hurricane Storm Surge Planning Zones are used to identify the risk of storm surge throughout the entire county, and are based upon an updated generation of the SLOSH Model. As a storm is approaching, Miami-Dade County Emergency Management will identify which areas should evacuate for that particular storm. A description of the Storm Surge Planning Zones are outlined below.

- Zone A is at greatest risk for storm surge for Category 1 and higher storms.
- Zone B is at greatest risk for storm surge for Category 2 and higher storms.
- Zone C is at greatest risk for storm surge for Category 3 and higher storms.
- Zone D is at greatest risk for storm surge for Category 4 and higher storms.
- Zone E is at greatest risk for storm surge from Category 5 storms.

The American Dream Miami (ADM) CDMP Amendment project area lies generally east of the HEFT, west of I-75, north of NW 178 Street and south of NW 186 Street. This exhibit identifies that the CDMP Amendment project is located within Storm Surge Planning Zone C and D which is at risk for storm surge under Category 3 storms or higher. The CDMP Amendment property is currently unimproved and has not yet been developed or graded to meet current flood elevation standards. When improvements are provided on-site and the property has addressed all flood elevation standards, the site should be able to qualify for Storm Surge Planning Zone D consistent with adjacent properties.

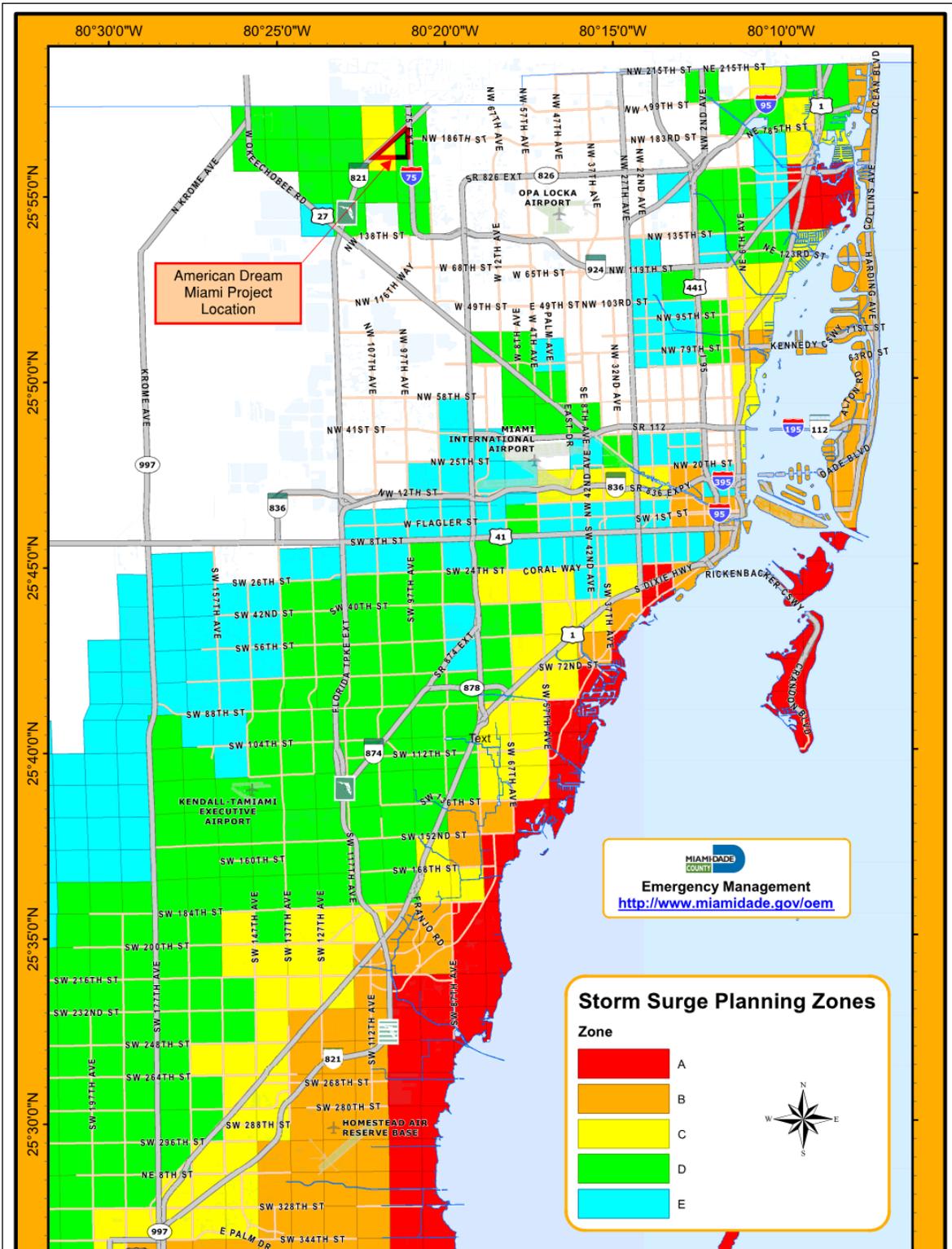


Exhibit 23-1: Miami Dade County Storm Surge Planning/Evacuation Zone Map

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

The CDMP Amendment for the ADM development, includes up to 2000 hotel rooms. Their location is depicted on the Miami-Dade County hurricane evacuation zone map shown as **Exhibit 23-1**. This development is not located within the “high hazard hurricane evacuation area”.

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

The proposed development is located partially in Zone C and Zone D of the Miami-Dade County Evacuation Zone Map. However, it is not located within a designated special hurricane preparedness district.

B.

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

Based upon the information provided in the 2014 Statewide Emergency Shelter Plan dated January 31, 2014, the hurricane evacuation center capacity for Miami-Dade County consists of 76,470 public shelter spaces with a demand for 61,894 shelter spaces, thus a surplus of 14,576 Shelter Spaces as outlined in **Table 23-1** below. The Shelter Capacity includes accommodations for Standard Shelter Space and Special Needs Shelter Space also outlined in **Table 23-1** below.

Table 23-1

Shelter Space	Capacity	Demand	Surplus
Standard Shelter Space	73,162	59,177	13,985
Special Needs Shelter Space	3,308	2,717	591
Total	76,470	61,894	14,576
ADM CDMP Amendment Demand		1533	-1533
Total with Amendment		63,427	13,043 – Updated Surplus

The Applicant has estimated the public shelter demand for 2000 hotel rooms as presented in **Table 23-2**. The analysis demonstrates a potential demand for 1533 shelter spaces (as outlined in Table 23-2) when 70% of the proposed hotel rooms seek shelter in Miami-Dade County for a Category 3 or higher storm. The Applicant has utilized the data and analysis provided in the Florida Statewide Regional Evacuation Studies Program which includes the participation rates for Category 3 Storms, the persons per dwelling unit, the percent of evacuees to local public shelters, the persons per hotel room, the updated seasonal occupancy of hotel rooms during hurricane season and the updated persons per hotel room to develop the estimated shelter demand. Given the peak demand results from Table 23-2 that forecasts a demand for **1533** shelter spaces from the proposed 2000 hotel rooms for the ADM Amendment Site, Miami-Dade County will still have a **13,043** public shelter space surplus under Evacuation Level C.

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

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

TABLE 23-2

American Dream Miami - CDMP Amendment

HURRICANE EVACUATION TRAFFIC ANALYSIS - Category 3 Evacuation and Shelter Analysis

Evacuation Vehicles Generated by Project

Dwelling Units	0	residential du's	<i>*Evacuation Rate does not factor in as no Dwelling Units are proposed for this development</i>
Hotel Units	2000	hotel rooms	
Evacuation Participation Rate for Category 3	80%	of units*	Source : Table IIIB-1, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions
Out of County Evacuation Rates	70%	of units	Source : Table IIIB-2, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions
Vehicles per Dwelling Unit	1.65	vehicles per permanent unit	Source : Table MDTAZ, Volume 1-11 South Florida
Vehicles per Hotel Unit	1.05	vehicles per occupied seasonal unit	Source : Table MDTAZ, Volume 1-11 South Florida
Evacuation Vehicle Usage Rate	70%	of permanent unit vehicles	Source : Table IIIB-3, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions
	100%	of seasonal unit vehicles	
Seasonal Unit Occupancy Levels	75%	occupancy during Hurricane Season	Source : Table MDTAZ, Volume 1-11 South Florida

Category 3

Evacuation Vehicles Generated by Project	1575	Evac Vehicles	$[DU*60\%*1.65 \text{ veh/du}*70\% \text{ veh usage}] + [\text{Rooms}*1.05 \text{ veh/rm}*100\% \text{ veh usage}*75\% \text{ seasonal occupancy}]$
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Public Shelter Demand Generated by Project

People per Unit	2.86	people per permanent unit	Source : Table MDTAZ, Volume 1-11 South Florida
	1.46	people per occupied seasonal unit	Source : Table MDTAZ, Volume 1-11 South Florida
Percent of Evacuees to Local Public Shelter	5%	of permanent resident evacuees	Source : Table IIIB-4, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions
Percent of Evacuees to Friend/Relative Refuge	65%	to local homes of friends/relatives	Source : Table IIIB-5, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions
Percent of Evacuees to Hotel-Motels	20%	to hotel-motels	Source : Table IIIB-6, Volume 1-11 South Florida, Appendix IIIB - Miami-Dade County Planning Assumptions

Category 3

Public Shelter Demand Generated by Project	1533	Shelter Demand	$[DU*80\%*2.86 \text{ per/du}*5\% \text{ to shelter}] + [\text{Rooms}*70\%*\text{season occupancy}*1.46 \text{ per/rm}]$
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Evacuation Vehicles as Percent of LOS E Directional Service Volume under Category 3

Designated Evacuation Routes

	10L FWY HEFT SO Site	10L FWY HEFT NO Site	10L FWY I-75 NO HEFT	10L FWY I-75 SO HEFT	8L FWY Palmetto NO Gratigny	10L FWY Palmetto SO Gratigny	6L FWY Gratigny	
Percent of Evacuation Traffic Using Adjacent Evacuation Road Network	15.00%	25.00%	25.00%	15.00%	5.00%	5.00%	5.00%	0.00%
Evacuation Vehicles by Route	236 vehicles	394 vehicles	394 vehicles	236 vehicles	79 vehicles	79 vehicles	79 vehicles	0 vehicles
Highest Hourly Contribution of Evacuation Traffic as a % of Total Evacuation Traffic Based on Medium Behavioral Response Curve	30.00%	30.00%	30.00%	30.00%	30.00%	30.00%	30.00%	0.00%
Highest Hourly Contribution of Evacuation Traffic by Route from Project	71 vehicles	118 vehicles	118 vehicles	71 vehicles	24 vehicles	24 vehicles	24 vehicles	0 vehicles
Maximum Directional LOS E Service Volume per Evacuation Route	10,360 veh per hour	10,360 veh per hour	10,360 veh per hour	10,360 veh per hour	8,220 veh per hour	10,360 veh per hour	6,080 veh per hour	1860 veh per hour
Maximum Hourly Evacuation Vehicles as a % of LOS E Hourly Directional Service Volume	0.68%	1.14%	1.14%	0.68%	0.29%	0.23%	0.39%	0.00%

Figure 7 from the Transportation Element of the Miami-Dade County CDMP identifies the designated hurricane evacuation routes for the entire County as depicted on **Exhibit 23-2**. **Exhibit 23-3** has been prepared to illustrate the hurricane evacuation routes for the northern portion of the County which are located adjacent to the CDMP Amendment Site for **The American Dream Miami**. The hurricane evacuation routes adjacent to and serving the Amendment Site include the HEFT, I-75, SR-826, Okeechobee Road and SR-924/Gratigny Parkway.

Table 23-2 has been prepared to calculate the estimated traffic impact from the hotel traffic (no residential traffic is proposed for the project) generated by the Amendment Site that are likely to participate in some form of hurricane evacuation activity based upon the evacuation of **100%** of the occupied hotel rooms (75% seasonal occupancy assumed) based upon the Miami-Dade County evacuation rates for a Category 3 storm under a Category 3 Evacuation Zone (pursuant to *Table IIIB-1, Volume 1-11 from the Statewide Regional Evacuation Studies Program*).

Projected traffic distribution percentages to the designated hurricane evacuation routes are provided on the attached **Exhibit 23-4**. The percentage of project traffic estimated to use these designated evacuation routes at project buildout is provided in **Table 23-2**. Also provided are the calculations of the evacuation project traffic as a percent of the **Level of Service E** hourly directional maximum service volumes, which are illustrated on **Exhibit 23-5**.

Using the socioeconomic and behavioral assumptions from the Statewide Regional Evacuation Study Program, the proposed CDMP Amendment will add an estimated **1575** evacuating vehicles to the adjacent roadway network under Evacuation Level C.

The Applicant has utilized the updated participation rates for Category 3 Storms, the updated vehicles per dwelling unit, the updated vehicle usage rate for dwelling units during hurricanes, the updated vehicles per hotel room and the updated seasonal occupancy of hotel rooms during hurricane season to develop the estimate of evacuation vehicles. To calculate the development's maximum **hourly** contribution to the evacuation network, the Applicant has used 30% as the highest hourly percentage of evacuees loading the roadway network based upon the behavioral assumptions from the prior hurricane study for Miami-Dade County.

Those roadways designated as official evacuation routes (pursuant to Figure 7 of the Transportation Element in the adopted CDMP) were analyzed to determine if the proposed development's evacuation traffic would utilize **25 percent or more**

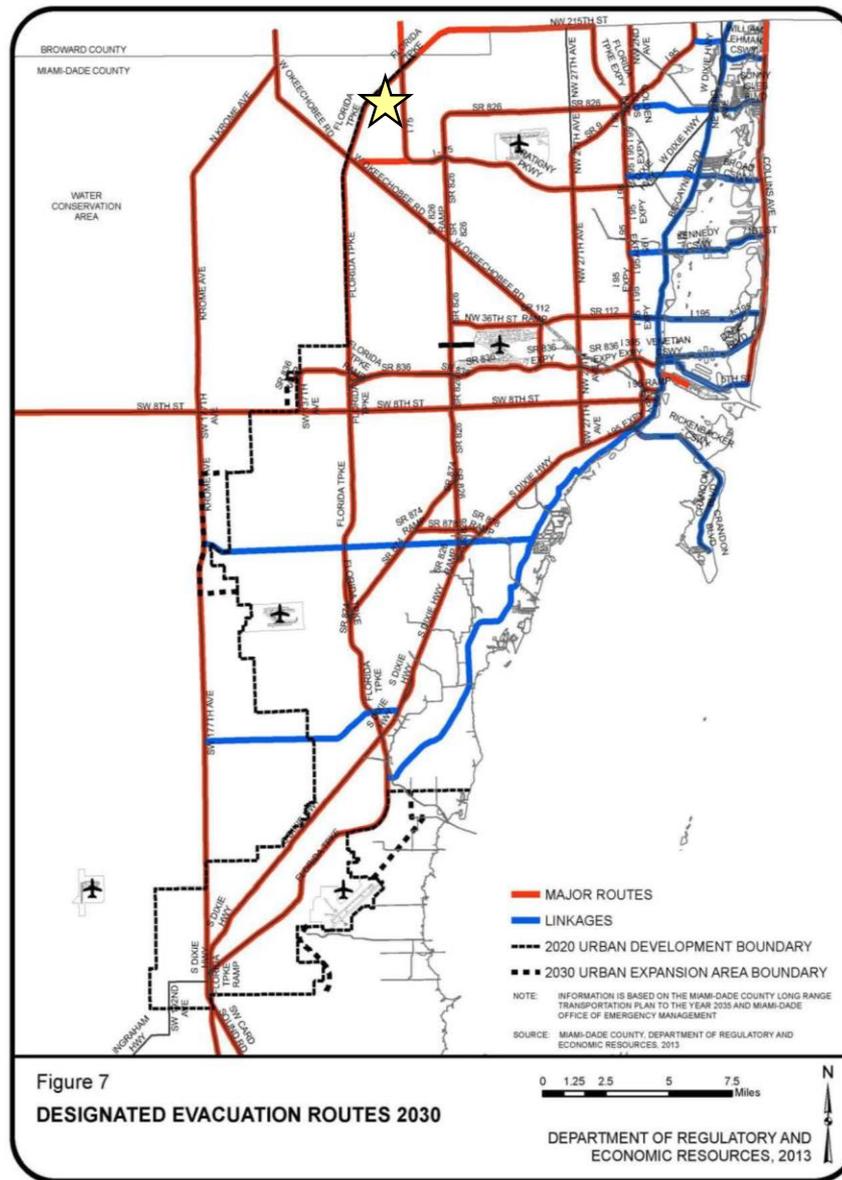
of the evacuation route's LOS E hourly directional maximum service volume (MSV). If the evacuation traffic were to exceed 25% or more of the LOS E directional MSV, it would be found to have a material adverse effect on the local area's evacuation network. **Table 23-2** provides the calculations to show the maximum hourly evacuation vehicles as a % of the LOS E hourly directional service volume. The evacuation traffic from the CDMP Amendment was found **not to exceed 25 percent or more** of the evacuation route's LOS E hourly directional maximum service volume. See attached **Exhibit 23-5** to illustrate the CDMP Amendment evacuation traffic as a percent of the LOS E directional maximum service volume.

- Evacuation vehicles assigned to HEFT south of NW 170 Street = 0.68% of the LOS E MSV;
- Evacuation vehicles assigned to HEFT north of NW 170 Street = 1.14% of the LOS E MSV;
- Evacuation vehicles assigned to HEFT east of I-75 = 0.68% of the LOS E MSV;
- Evacuation vehicles assigned to I-75 north of HEFT = 1.14% of the LOS E MSV;
- Evacuation vehicles assigned to I-75 south of HEFT = 0.68% of the LOS E MSV;

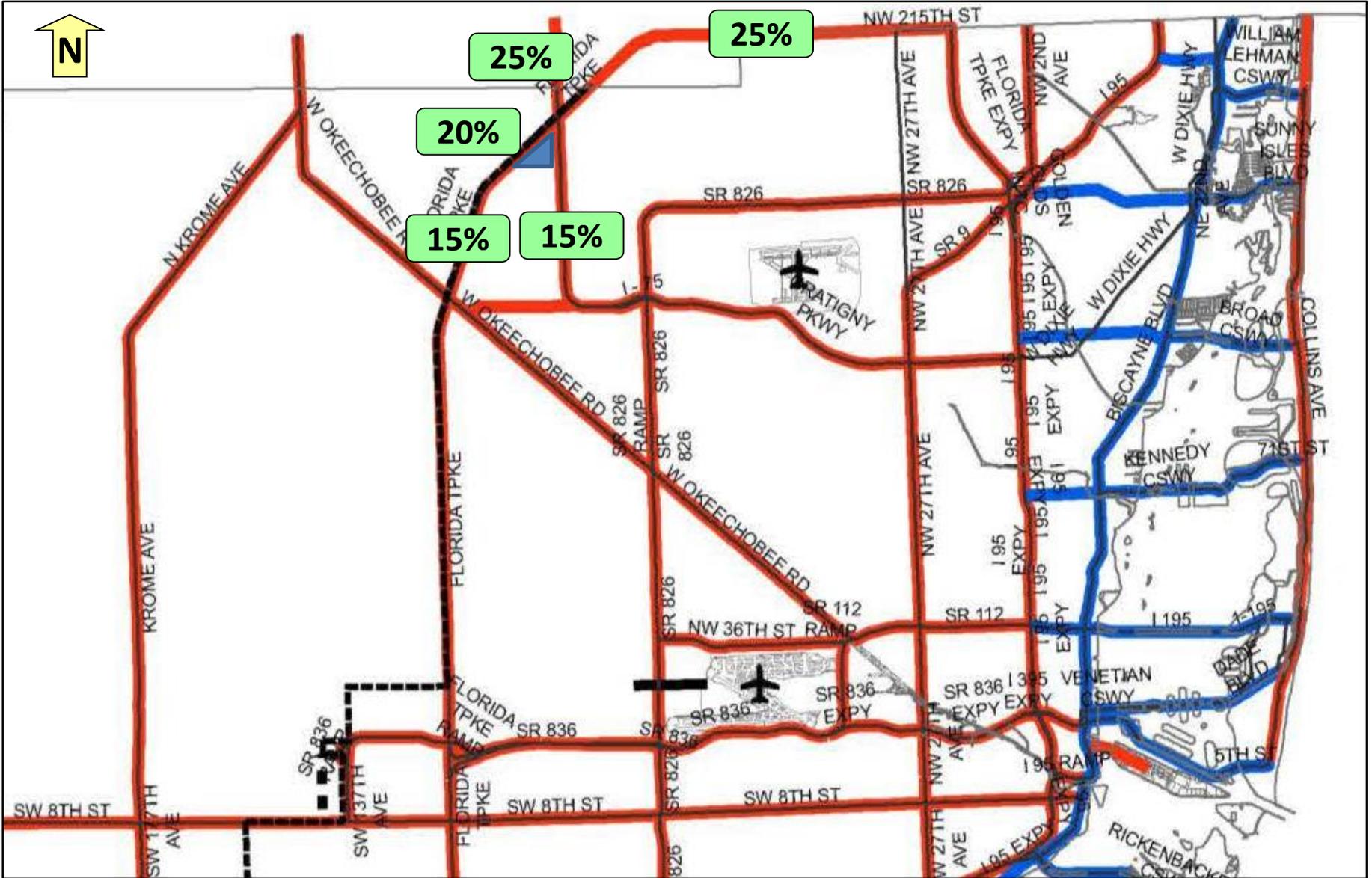
The evacuation traffic assignments from the CDMP Amendment area are not anticipated to impact clearance times for Miami-Dade County road segments in the north and northeast part of the county. These segments will meet the overall evacuation clearance times on which the county bases its evacuation decision making. The proposed CDMP Amendment will have little to no impact on the bottlenecks in the other parts of the county.

C. Identify and describe any action(s) or provisions that will be undertaken to mitigate impacts on hurricane preparedness.

Based on the analyses performed in **Table 23-2** the CDMP Amendment Evacuation Traffic will not utilize 25 percent or more of the evacuation route's LOS E hourly directional maximum service volume and therefore no additional mitigation is required.



★ American Dream Miami



25%

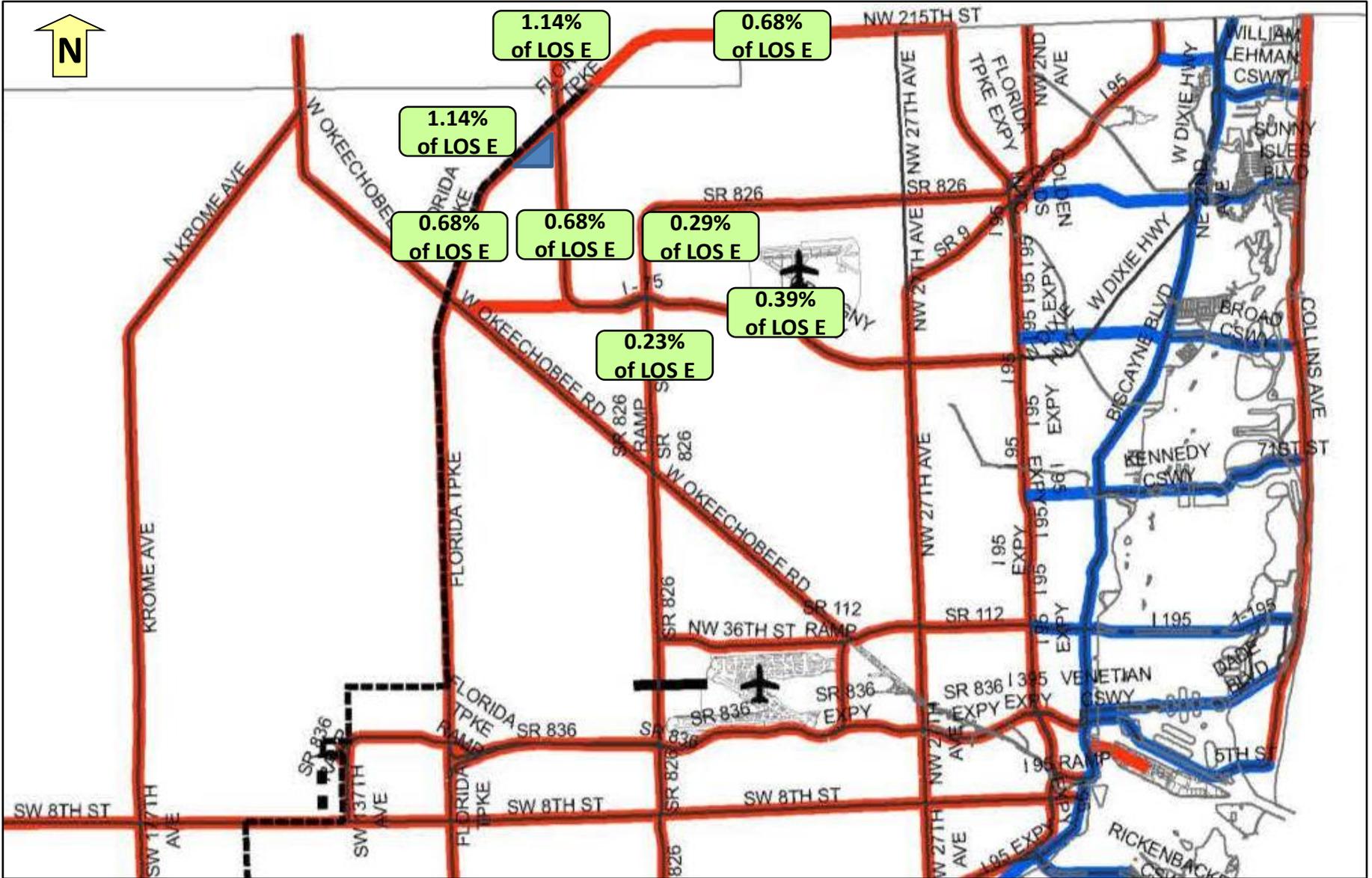
25%

20%

15%

15%

American Dream Miami – Amendment 146 Site Location
 ADM Hurricane Evacuation Distribution for Year 2040



 American Dream Miami – Amendment 146 Site Location
 ADM Hurricane Evacuation Distribution % of LOS E

QUESTION 25 – POLICE AND FIRE PROTECTION

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

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

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

Pending.

QUESTION 29 - ENERGY

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

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

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

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

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

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

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

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

Not Applicable.

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

Not Applicable.

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

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

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

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

Exhibit 29-1



Florida Power & Light Company

November 24, 2015

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

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

Dear Miguel Diaz de la Portilla:

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

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

Sincerely

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

FPL representative

Construction Project Manager

QUESTION 30 - HISTORICAL AND ARCHAEOLOGICAL SITES

A.

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

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

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

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

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

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

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

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

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

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

QUESTION 32 – ATTRACTIONS AND RECREATION FACILITIES

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

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

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

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

