

**AMENDMENT REQUEST TO THE
LAND USE ELEMENT & LAND USE PLAN MAP
OCTOBER 2016 AMENDMENT CYCLE
MIAMI-DADE COUNTY
COMPREHENSIVE DEVELOPMENT MASTER PLAN**

1. APPLICANT

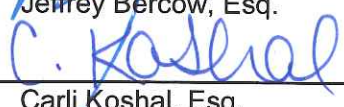
Adler 13th Floor Douglas Station, LP
1400 NW 107th Avenue
5th Floor
Miami, FL 33172

2. APPLICANT'S REPRESENTATIVES

Jeffrey Bercow, Esq.
Bercow Radell & Fernandez, PLLC
200 South Biscayne Boulevard, Suite 850
Miami, Florida 33131
(305) 374-5300

By: 
Jeffrey Bercow, Esq.

Date: October 31, 2016

By: 
Carli Koshal, Esq.

Date: October 31, 2016

3. DESCRIPTION OF REQUESTED CHANGES

Amendments to the Comprehensive Development Master Plan ("CDMP") and Land Use Plan Map ("LUPM") are requested.

A. A change to the Land Use Element text and the Land Use Plan Map is requested.

B. Description of Application Area

The Application Area includes the Douglas Road Metrorail Station and appurtenant County-owned land located in the northwest corner of the intersection between 37th Avenue and US-1 in Section 20, Township 54 South, Range 41 East (the "Douglas Road Station"). The Douglas Road Station is approximately 7.54 net acres / 9.68 gross acres in size. The Application Area is more accurately described on the attached location map and survey. The terms Application Area and Douglas Road Station are used interchangeably throughout this application.

C. Acreage

Application Area: approximately 7.54 net / 9.68 gross acres

RE-PLANNING DIVISION

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RECEIVED

Acreage owned by Applicant: 0 acres.

D. Requested Changes

- 1) It is requested that the Douglas Road Metrorail Station Community Urban Center be redesignated on the CDMP LUPM from Community Urban Center to Metropolitan Urban Center.
- 2) It is requested that proposed text included in Exhibit B be inserted into the Urban Center section of the Land Use Element of the CDMP.

4. REASONS FOR AMENDMENTS

The Douglas Road Station is located within the City of Miami. The CDMP LUPM currently designates the Douglas Road Station and surrounding area as a Community Urban Center. Although the Douglas Road Station is located within the City of Miami, redevelopment jurisdiction is retained by Miami-Dade County through Chapter 33C and Section 33C-8 of the Miami-Dade County Code of Ordinances ("County Code"). At this time, Miami-Dade County, the owner of the Douglas Road Station, is seeking to redevelop this area. In the second half of 2014, Miami-Dade County issued a Request for Proposals ("RFP") for redevelopment of the Douglas Road Station. In evaluating the Douglas Road Station for redevelopment, the Miami-Dade County Department of Transportation and Public Works and the awardee of the RFP, the Applicant, have recognized that the Douglas Road Station should more appropriately be designated as a Metropolitan Urban Center, rather than its current designation as a Community Urban Center. The Douglas Road Station is directly connected to rapid rail transit and the greater density and intensity of the Metropolitan Urban Center would allow development further in line with Chapter 33C of the County Code and the first Objective of the CDMP Land Use Element stating that "the location and configuration of Miami-Dade County's urban growth through the year 2030 shall emphasize concentration and intensification of development around centers of activity, development of well designed communities containing a variety of uses, housing types and public services....".

The proposed text amendment outlines the Urban Center standards which will be applicable to the Douglas Road Station Metropolitan Urban Center. Densities and intensities of developments located within the Douglas Station Metropolitan Urban Center will not be lower than those provided in Policy LU-7F. Further, development within the Douglas Station Metropolitan Urban Center will have a minimum Floor Area Ratio (FAR) of 3.0, and a maximum FAR of 8.0 in the core, and an FAR of not less than 0.75 and a maximum FAR of 1.50 in the edge; and a maximum density of 250 dwellings per gross acre. The proposed text amendment confirms that the Douglas Road Metrorail Station and associated rapid transit zone will be the core of the urban center and developed accordingly. Additionally, the proposed text clarifies that properties outside the urban center core, which are located within the incorporated municipalities of Miami and Coral Gables, will be developed in accordance with those municipalities' adopted comprehensive plans and zoning. The City of Miami and the City of Coral Gables have not created regulations which specifically incorporate Urban Center development standards. Therefore, development within those incorporated areas, outside the Douglas Station Property, will be developed in accordance with their respective municipalities' regulations until such a time as those municipalities adopt comprehensive plans and zoning which match the Urban Center standards.

Amendments to LUPM. Policy LU-8E indicates that applications requesting amendments to the CDMP Land Use Plan map must 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;
- 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.

Plan Map Deficiency. The re-designation of the Application Area from Community Urban Center to Metropolitan Urban Center will permit increased density and intensity at a location that is centrally located and well-served by transit and urban infrastructure. The redevelopment of the Douglas Road Station will accommodate projected population growth close to the urban core and generate economic growth by creating a mixed-use, walkable and transit oriented town center.

Infrastructure. The Applicant does not anticipate that the approval of this application will result in a deficiency in the adopted LOS standards. The Applicant has submitted a traffic analysis which demonstrates compliance with traffic LOS standards. Further, the Applicant will work with other Departments and agencies to address any potential concerns.

Compatibility. The proposed shift from Community Urban Center to Metropolitan Urban Center will be entirely compatible with abutting and nearby land uses. This area is easily accessible by transit and roadways and the proposed development will introduce the component of walkability. The surrounding areas in the City of Miami are also designated for mixed-uses, residential and commercial, while the nearby areas in the City of Coral Gables are currently industrial. It should be noted that the surrounding area is in a state of transition. Bird Road (SW 40 Street) is becoming an increasingly prominent thoroughfare in this part of Miami-Dade County, and redevelopment patterns in this area reflect this shift. A number of approximately twelve (12) story, mixed-use multi-family residential projects are in the process of being developed in the Application Area's immediate vicinity. Additionally, these new developments will serve to transition the Douglas Road Station Urban Center "core" from the less dense and intense "edge" areas. Further, the proposed text amendment contains specific language which allows development outside of the Douglas Road Station core to be developed in accordance with the applicable municipality's adopted comprehensive plan and zoning, until such time as those municipalities amend their respective comprehensive plans and land development regulations to allow densities and intensities commensurate with the proposed Metropolitan Urban Center.

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 or environmental resources.

Urban Center. This criterion is the heart of this application: the Applicant seeks to develop an entirely transit-oriented, mixed-use town center that promotes transit ridership and pedestrianism in compliance with Objective LU-7, as further described above.

Consistency with CDMP Objectives and Policies. This application addresses several policies and objectives within the Land Use Element and Transportation Element of the CDMP.

The Future Land Use Element of CDMP describes the long-term planning vision for "Urban Centers." Specifically, page I-45 of the CDMP indicates that "Diversified urban centers are encouraged to become hubs for future urban development intensification in Miami-Dade County, around which a more compact and efficient urban structure will evolve." The CDMP envisions that Urban Centers will contain a variety of uses, including commercial and residential uses, which are cohesively designed, have direct accessibility to mass transit, and are integrated both vertically and horizontally. The locations of urban centers and their combination of uses should be "designed to encourage convenient alternatives to travel by automobile, to provide more efficient land use than recent suburban development forms, and to create identifiable 'town centers' for Miami-Dade's diverse communities." See Page I-46 of the Comprehensive Plan. In line with this concept, Miami-Dade County has designated many Metro-rail transit stations as Urban Centers on the Future Land Use Map, the Douglas Road Station included. However, unlike other stations, the Douglas Road Station is uniquely located at the intersection of two major roadways and the border between the City of Miami and the City of Coral Gables. These factors favor the Douglas Road Station with pedestrian and vehicular traffic not enjoyed by other Metrorail stations; thus redevelopment of the Douglas Road Station will encourage the use of transit in a manner that other stations cannot.

The CDMP's Statement of Legislative Intent identifies Urban Centers as an issue of County-wide importance. Urban Centers are specifically identified in the Statement of Legislative Intent as one of four fundamental growth management components "that are necessary to carry on a central metropolitan government in Miami-Dade County..." and providing further that the County's policies with respect to Urban Centers "shall serve as minimum standards for zoning, service, and regulation to be implemented through all municipal comprehensive plans and land development regulations." The Land Use Element of the CDMP builds on this concept..

Approval of this application is consistent with the following Objectives and Policies of the CDMP Land Use Element:

- **Objective LU-1. The location and configuration of Miami-Dade County's urban growth through the year 2025 shall emphasize concentration and intensification of development around centers of activity, development or well designed communities containing a variety of uses, housing types and public services, renewal and rehabilitation of blighted areas, and contiguous urban expansion when warranted, rather than sprawl.**

The instant application will concentrate and intensify development around a center of transit activity. The change from Community Urban Center to Metropolitan Urban Center will

encourage the creation of a mixed-use, multi-purpose transit hub in an infill location where public services, including transit, can comfortably accommodate the increase.

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

The Applicant seeks to develop a high intensity, well-designed urban center at a location with access to existing Metrorail transit, in addition to pedestrian, bicycle, bus, and vehicular access. US-1, Douglas Road, the Underline, and the Metrorail confer on the site the very definition of countywide multimodal 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.**

The proposed amendments will grant priority to well-planned urban infill development which will revitalize this section of Miami-Dade County with a project that prioritizes access to transit, bicycle, and the pedestrian experience. Due to this area's proximity to residential uses, the Underline, and transit, the Douglas Road Station Urban Center can accommodate additional demand in a way that other areas cannot.

- **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.**

US-1, Douglas Road, and the Metrorail create a node of activity that proper planning, as proposed by the Applicant, will be able to harness and encourage. Businesses created will be able to serve not only patrons from the immediately surrounding area, but also patrons from other parts of the County that arrive by vehicle, bicycle, and Metrorail.

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

The change in Urban Center designation will promote development of transit-oriented, mixed use development in a safe, pedestrian and bicycle friendly environment. Transit is integral to the proposed redevelopment of this area and will promote mobility for people of all ages and abilities through access to the Metrorail.

- **Policy LU-7A.** Through its various planning, regulatory and development activities, Miami-Dade County shall encourage development of a wide variety of residential and non-residential land uses and activities in nodes around rapid transit stations to promote mobility, produce short trips, minimize transfers, attract transit ridership, and promote travel patterns on the transit line that are balanced directionally and temporally to promote transit operational and financial efficiencies. Land uses that may be approved around transit stations shall include housing, shopping and offices in moderate to high densities and intensities, complemented by compatible entertainment, cultural uses and human services in varying mixes. The particular uses that are approved in a given station area should, a) respect the character of the nearby community, b) strive to serve the needs of the community for housing and services, and, c) promote a balance in the range of existing and planned land uses along the subject transit line. Rapid transit station sites and their vicinity shall be developed as "urban centers" as provided in this plan element under the heading Urban Centers.

The Applicant intends to redevelop the Douglas Road Station as mixed-use hub that provides essential services to the surrounding community as well as draws patrons from other parts of the County via transit. The envisioned development will respect the character of the nearby community, by limiting intense development to the "core" of the Urban Center and providing a balance in the range of existing and proposed uses.

- **Policy LU-7F.** Residential development around rail rapid transit stations should have a minimum density of 15 dwelling units per acre (15 du/ac) within 1/4 mile walking distance from the stations and 20 du/ac or higher within 700 feet of the station, and a minimum of 10 du/ac between 1/4 and 1/2 mile walking distance from the station. Business and office development intensities around rail stations should produce at least 75 employees per acre within 1/4 mile walking distance from the station, 100 employees per acre within 700 feet, and minimum of 50 employees per acre between 1/4 and 1/2 mile walking distance from the station. Where existing and planned urban services and facilities are adequate to accommodate this development as indicated by the minimum level-of-service standards and other policies adopted in this Plan, and where permitted by applicable federal and State laws and regulations, these densities and intensities shall be required in all subsequent development approvals. Where services and facilities are currently or projected to be inadequate, or where required by Policy LU-7A, development may be approved at lower density or intensity provided that the development plan, including any parcel plan, can accommodate, and will not impede, future densification and intensification that will conform with this policy.

Douglas Road Station and the surrounding Urban Center area are in the relatively unique position of being able to accommodate a variety of uses, including residential uses, based on proximity to roadways and transit. The minimum standards in Policy LU-7F will certainly be satisfied.

These policies are critical elements of the Comprehensive Plan's integration of transportation infrastructure into land use planning. However, this application is also consistent with the Goal, Objectives, and Policies of Transportation Element of the CDMP:

- **Transportation Element Goal.** Develop and maintain an integrated multimodal transportation system in Miami-Dade County to move people of all age and abilities and goods in a manner consistent with overall countywide land use and environmental protection goals and integration of climate change considerations in the fiscal decision-making process.

The increase to the proposed Metropolitan Urban Center for Douglas Road Station will encourage revitalization of the aging Metrorail Station. Pedestrians and transit users of all ages and abilities will be given priority throughout the area to be redeveloped.

- **TE-1F. Transit-supportive Land Use Element policies including, but not limited to, Urban Center guidelines shall be vigorously implemented in association with planned rapid transit facilities identified in the Mass Transit Subelement.**

The Applicant seeks updating and implementation of the Urban Center designation most beneficial to the County's existing Douglas Station rapid transit facility. The proposed amendments will ensure development of a well-planned transit-oriented project centered around the Metrorail, bus access, and pedestrian access.

- **TE-3B. Miami-Dade County shall analyze planned land use patterns and intensities in planned rapid and premium transit station areas and shall identify transportation and land use plan changes needed to improve interrelationships. This analysis shall address, at a minimum, the existing Metrorail corridor, the planned initial segment of the East-West corridor, the planned North corridor, and the South Miami-Dade Busway corridor as well as rapid and premium transit corridors listed in the Mass Transit Subelement. This analysis shall identify locations where planned transit facilities are not supported by the planned land use or development intensity with consideration of mitigating benefits of planned transit rider feeders such as major park-and-ride or bus terminal facilities in the corridor. Where such locations are identified, alternative land uses or intensities will be analyzed, and potential land use or transportation plan amendments will be identified. The information produced by this analysis shall be provided to the MPO, the Board of County Commissioners and the directly affected municipalities having comprehensive planning and zoning jurisdiction in the immediate vicinity of these planned transit corridors for their consideration. It is the policy of Miami-Dade County that affected municipalities consider local plan amendments to reflect the findings of this analysis.**

The instant application requests a land use plan change needed to improve the interrelationship between the Metrorail, buses, vehicles, bicyclists, and pedestrians within this area. While affected municipalities may choose to follow the lead set by Miami-Dade County, they are not required to do so unless those municipalities determine the shift is compatible with the properties within their jurisdiction.

5. ADDITIONAL MATERIAL SUBMITTED

- 1) Legal Description and Location Map of Application Area
- 2) Sketch of Survey
- 3) Traffic Analysis

The Applicant reserves the right to supplement the application with additional documentation within the time permitted by the Code of Miami-Dade County.

6. **COMPLETE DISCLOSURE FORMS:** See attached.

DISCLOSURE OF INTEREST

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

1. APPLICANT (S) NAME AND ADDRESS:

APPLICANT (A): Adler 13th Floor Douglas Station, LP
1400 NW 107th Avenue
5th Floor
Miami, FL 33172

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

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

<u>APPLICANT</u>	<u>OWNER OF RECORD</u>	<u>FOLIO NUMBER*</u>	<u>ACRES IN SIZE (net) *</u>
		01-4120-068-0010	2.46
		01-4120-059-0010	0.37
		01-4120-059-0020	1.95
		01-4120-068-0020	2.76
<u>A</u>	Miami-Dade County	Total:	7.54 acres

* See Survey submitted with application

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

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

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

- 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.

INDIVIDUAL'S NAME AND ADDRESS

PERCENTAGE OF INTEREST

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 (5), 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: _____

<u>NAME, ADDRESS, AND OFFICE (if applicable)</u>	<u>PERCENTAGE OF STOCK</u>
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- c. If the applicant is a TRUSTEE, list the trustee's name, the name 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

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

- 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 (5) trust (5) 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: Adler 13th Floor Douglas Station, LP

NAME AND ADDRESS OF PARTNERS

PERCENTAGE OF
INTEREST

See attached for further disclosure

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

NAME AND ADDRESS

PERCENT AGE OF
INTEREST

N/A

Date of Contract: _____

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

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

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

INDIVIDUAL'S NAME AND ADDRESS

PERCENTAGE OF
INTEREST

N/A

- 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: Miami-Dade County, municipal corporation

<u>NAME, ADDRESS, AND OFFICE (if applicable)</u>	<u>PERCENTAGE OF STOCK</u>
--	----------------------------

N/A

- 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:** N/A

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

- 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:
N/A

<u>NAME AND ADDRESS OF PARTNERS</u>	<u>PERCENTAGE OF OWNERSHIP</u>
-------------------------------------	--------------------------------

N/A

- 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

N/A

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

N/A

For any changes of ownership or changes in contract 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.

[Signature Page Follows]

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

Title:
Adler 13th Floor Douglas Station, LP

Sworn to and subscribed before me
this 31 day of OCTOBER, 2016.

Notary Public, State of Florida at Large (SEAL)
My Commission Expires: MARCH 24, 2020



Elisa Seguin
Commission # FF975191
Expires: March 24, 2020
Bonded thru Aaron Notary

Disclosure shall not be required of any entity, the entity 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.

Disclosure of Interest

Adler 13th Floor Douglas Station, LP

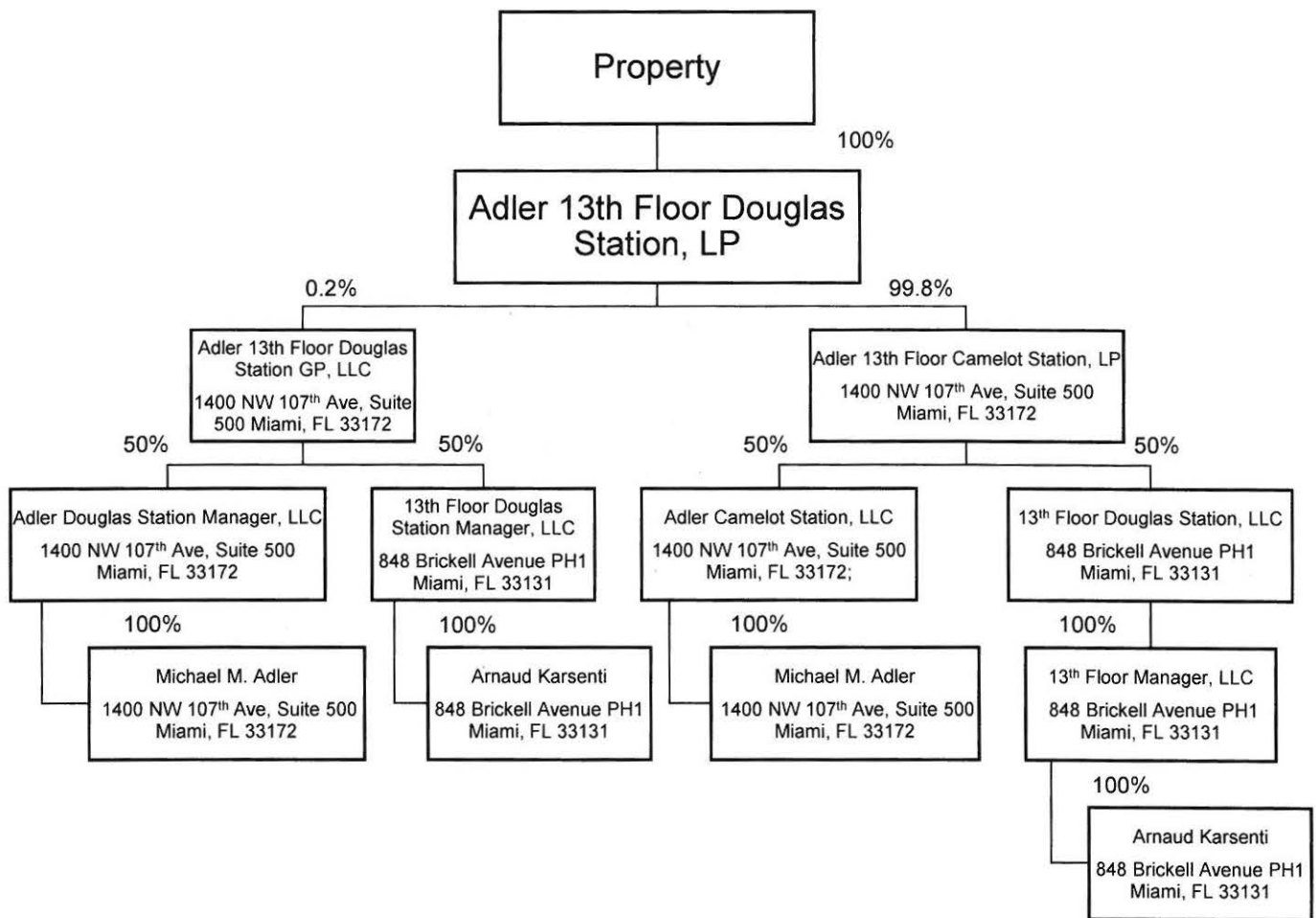


EXHIBIT A

LOCATION MAP FOR APPLICATION TO AMEND THE COMPREHENSIVE DEVELOPMENT MASTER PLAN

APPLICANT / REPRESENTATIVE

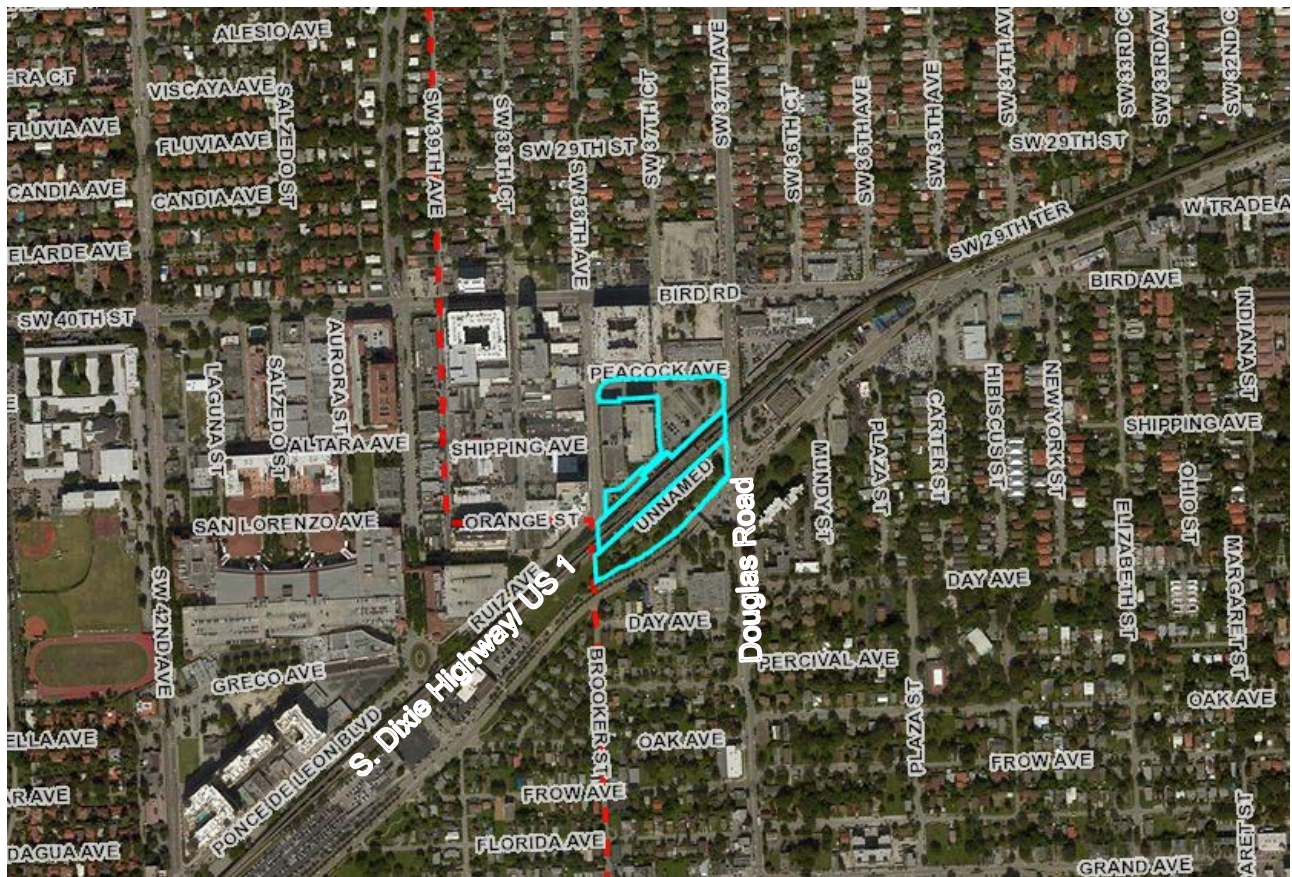
Adler 13th Floor Douglas Station, LP / Jeffrey Bercow, Esq.

DESCRIPTION OF SUBJECT AREA

PARCEL 1: TRACTS A AND B, OF "DOUGLAS ROAD STATION VINTAGE," ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 169, PAGE 33, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA.

PARCEL 2: LOTS 1 AND 2, IN BLOCK 1, OF "DOUGLAS ROAD STATION," ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 158, PAGE 32, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA; LESS AND EXCEPT THE FOLLOWING:

TRACTS A AND B, OF "DOUGLAS ROAD STATION VINTAGE," ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 169, PAGE 33, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA



Application Area: 7.54 Net Acres owned by Miami-Dade County
0 Net Acres owned by Applicant

LEGAL DESCRIPTION OF SUBJECT AREA

PARCEL 1: TRACTS A AND B, OF "DOUGLAS ROAD STATION VINTAGE," ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 169, PAGE 33, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA.

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TRACTS A AND B, OF "DOUGLAS ROAD STATION VINTAGE," ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 169, PAGE 33, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA

Net Area: 328,308 Square Feet / 7.54 Acres
Gross Area: 421,798 Square Feet / 9.68 Acres

EXHIBIT B

AMENDMENT REQUEST TO THE LAND USE ELEMENT & LAND USE PLAN MAP OCTOBER 2016 AMENDMENT CYCLE MIAMI-DADE COUNTY COMPREHENSIVE DEVELOPMENT MASTER PLAN

Adler 13th Floor Douglas Station, LP / Jeffrey Bercow, Esq.
Proposed Text Amendment

Amend the Urban Center provisions, page I-48 of the CDMP Land Use Element as follows:

LAND USE ELEMENT

* * *

Urban Centers

* * *

Density and Intensity. The range of average floor area ratios (FARs) and the maximum allowed residential densities of development within the Regional, Metropolitan and Community Urban Centers are shown in the table below.

	Average Floor Area Ratios (FAR)	Max. Densities Dwellings per Gross Acre
Regional Activity Centers	greater than 4.0 in the core not less than 2.0 in the edge	500
Metropolitan Urban Centers	greater than 3.0 in the core not less than 0.75 in the edge	250
Community Urban Centers	greater than 1.5 in the core not less than 0.5 in the edge	125

In addition, the densities and intensities of developments located within designated Community Urban Centers and around rail rapid transit stations should not be lower than those provided in Policy LU-7F. Height of buildings at the edge of Metropolitan Urban Centers adjoining stable residential neighborhoods should taper to a height no more than 2 stories higher than the adjacent residences, and one story higher at the edge of Community Urban Centers. However, where the adjacent area is undergoing transition, heights at the edge of the Center may be based on adopted comprehensive plans and zoning of the surrounding area. Densities of residential uses shall be authorized as necessary for residential or mixed-use developments in Urban Centers to conform to these intensity and height policies.

As noted previously in this section, urban centers are encouraged to intensify incrementally over time. Accordingly, in planned future rapid transit corridors, these intensities may be implemented in phases as necessary to conform with provisions of the Transportation Element, and the concurrency management program in the Capital

Improvement Element, while ensuring achievement of the other land use and design requirements of this section and Policy LU-7F.

Douglas Road Metrorail Station. The policies for development of Urban Centers as set forth in this Land Use Element shall govern the Douglas Metrorail Station Metropolitan Urban Center (Douglas Station MUC) except as set forth herein. The CDMP Statement of Legislative Intent provides that the policies for development of Urban Centers are a fundamental CDMP growth management component, required for Miami-Dade County's central metropolitan government, and shall serve as minimum standards for zoning, service, and regulation for municipal governments to implement through their comprehensive plans and land development regulations. The Douglas Station MUC is located entirely within incorporated areas, and the County's Rapid Transit Zone land development regulations (Chapter 33C, County Code) govern the Douglas Road Metrorail Station property. Densities and intensities of developments located within the Douglas Station MUC should not be lower than those provided in Policy LU-7F. Further, development within the Douglas Station MUC core shall have a minimum Floor Area Ratio (FAR) of 3.0, and a maximum FAR of 8.0, and in the MUC edge an FAR of not less than 0.75 and a maximum FAR of 1.50; and a maximum density of 250 dwellings per gross acre. The Douglas Road Metrorail Station property shall constitute the core of the Douglas Station MUC and be developed accordingly. However, properties outside of the Douglas Station MUC core shall be developed in accordance with the following criteria: (1) The particular uses that are approved outside of the Douglas Station MUC core should, (a) respect the character of the nearby community, (b) strive to serve the needs of the community for housing and services, and, (c) promote a balance in the range of existing and planned land uses along the subject transit line; (2) Where services and facilities are currently or projected to be inadequate, the municipality may approve development at a lower density or intensity provided that the development plan, including any parcel plan, can accommodate, and will not impede, future densification and intensification that will conform with this paragraph; and (3) Development outside of the Douglas Station MUC core shall be developed in accordance with the applicable municipality's adopted comprehensive plan and zoning, until such time as those municipalities amend their respective comprehensive plans and land development regulations to allow densities and intensities of developments within the Douglas Station MUC as set forth in this paragraph.

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