

Consolidated Response to Department Issues

Parkland 2014 Comprehensive Development Master Plan (CDMP) Amended Application

PARKLAND

Development of Regional Impact



*Miami-Dade County, Florida
August 2008*



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August 11, 2008

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Miami-Dade County
111 NW 1st Street
11th Floor
Miami, FL 33128

Re: Parkland 2014 Comprehensive Development Master Plan ("CDMP")
Amendment Application
Consolidated Response to Department Issues

Dear Mr. LaFerrier:

On behalf of the Parkland 2014 project, we are pleased to submit our team's consolidated response to the various issues you and other members of the Department of Planning and Zoning staff raised during the meetings we held in your offices this past June.

Our consolidated response includes the project commitments that Parkland 2014 is prepared to accept as conditions to the development of regional impact development order issued for the Parkland 2014 project. These conditions will require providing infrastructure for such items as roads and schools (in both cases providing excess capacity beyond project demand within the study area), as well as onsite requirement standards for green development, workforce housing, and stormwater management.

We have also included analyses of the significant concerns that DP&Z staff has raised during our past meetings. These include a travel time analysis between Parkland and employment areas; the availability and proximity of extraordinary transit; the retention of viable agricultural lands; a response to the April letter from the National Park Service; and a discussion of Parkland 2014's consistency with CDMP Policy LU-8G.

Marc C. LaFerrier, AICP
August 11, 2008
Page 2

We believe that the enclosed response has completely addressed the substantive concerns regarding Parkland 2014 identified by DP&Z staff. We previously, through a separate submittal, have addressed the need for expanding the Urban Development Boundary ("UDB") by showing that the UDB does not include adequate residential land to provide for the County's projected growth through 2018, as required by CDMP Policy LU-8F. Thus, the Parkland 2014 application is consistent with the CDMP's goals, objectives and policies and merits a favorable recommendation from your Department.

In closing, Parkland 2014 is a proposed mixed-use, "green development" community that has been meticulously planned to address Miami-Dade County growth needs as of the year 2014, when the first certificates of occupancy/completion will be issued. By proceeding through the DRI process concurrently with the CDMP application, Parkland will not only more than pay its own way in terms of infrastructure as well as ongoing governmental services, but will serve as a model for all future applications to expand the UDB as well as for future County planning of new development.

We look forward to your Department's favorable review of this document and recommendation on the Parkland 2014 CDMP amendment application. Should you have any questions regarding either, please do not hesitate to call me at (305) 377-6220.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jeffrey Bercow", written in a cursive style.

Jeffrey Bercow

cc: Rey Melendi
Anthony Seijas
Rob Curtis
Graham Penn, Esq.

Table of Contents

<i>Section</i>	<i>Page</i>
Introduction	1
I. Development Order Commitments	3
A. Certificates of Occupancy	3
B. Parks & Open Space.....	3
C. Community Facilities	3
D. Green Development	4
E. Schools	4
F. Hurricane Preparedness	5
G. Transit	5
H. Transportation	5
I. Workforce Housing.....	9
J. Potable Water	9
K. Water Conservation.....	9
L. Wastewater Management	11
M. Stormwater Management.....	11
N. Economic Disparity.....	12
O. Blasting	12
P. Environmental	12
Q. Hazardous Materials	13
R. Biohazardous Materials.....	13
II. Commutation – Travel Time Analysis to Employment Areas	14
A. Commutation Patterns from the Kendall Area.....	14
B. Commutation Timeframes	18
C. Transit Travel Times.....	18
D. Automobile Travel Times.....	21
III. Premium Transit and the Coral Reef Max	27
A. Coral Reef Max – Metrobus Route 252.....	27
1. Country Walk Loop.....	27
2. Service to S.W. 162 Avenue	27

B. Consistency with Land Use Policy LU-8G.....	28
C. Local Transit Service to Parkland.....	31
D. Regional Transit Service to Kendall	31
E. No Transit Capture	31
IV. Agricultural Retention.....	36
A. Consistency of Parkland with CDMP and Strategic Plan	36
B. “No Net Loss” of Agricultural Land	36
C. “No Net Loss” Inconsistent with CDMP	37
D. Interpretative Text of the CDMP Land Use Plan Map	37
E. “No Net Loss” Concept Ignored.....	39
F. Consistent Application Required by Law.....	40
G. No Negative Impact on Viable Agricultural Lands	40
V. Consistency With Policy LU-8G of the Comprehensive Development	
Master Plan	43
A. Land that Shall Not Be Considered.....	43
B. Land that Shall be Avoided	43
C. Land that Should Be Given Priority for Inclusion.....	46
D. Application of Balancing Test.....	47
VI. Need for Hospital	48
VII. National Park Service Response	49

List of Exhibits

Exhibit I-1	Parkland Conceptual Master Plan.....	6
Exhibit I-2	Timing of Roadway Improvements based upon Trip Thresholds	7
Exhibit I-3	Net External PM Peak Hour Trip Rates.....	8
Exhibit II-1(a)	Miami-Dade Population by Area.....	16
Exhibit II-1(b)	Work Trip Distribution from the Kendall Area	17
Exhibit II-2	Transit Survey Routes	19
Exhibit II-3(a)	Automobile Survey Routes – Airport West/Doral.....	22
Exhibit II-3(b)	Automobile Survey Routes – Coral Gables	23
Exhibit II-3(c)	Automobile Survey Routes – Downtown Miami.....	24
Exhibit III-1	Location of the Coral Reef Max - Route 252	29
Exhibit III-2	Potential Transit Connections to Parkland using Route 252	30
Exhibit III-3	Potential Transit Connections to Parkland	32
Exhibit III-4	Regional Transit Corridors	33
Exhibit IV-1	Excerpt from Strategic Plan.....	38
Exhibit V-1	Land that Shall Not Be Considered	44
Exhibit V-2	Land that Shall Be Avoided	45

List of Tables

Table II-2	Transit Travel Times.....	18
Table II-3	Automobile Travel Times.....	21
Table II-4	Funded Roadway Improvements Improving Future Travel Times.....	25
Table II-5	Roadway Improvements Proposed by Parkland	26
Table III-1	Coral Reef Max – Metrobus Route 252 – Existing Service Frequency	28

INTRODUCTION

Parkland 2014 (“Parkland”) is a proposed mixed-use, “green development” community that has been planned to address Miami-Dade County’s growth and infrastructure needs from the date of the completion of the first homes in the community in 2014 through project build out. By proceeding through the Development of Regional Impact (“DRI”) process concurrently with an application seeking amendments to the County’s Comprehensive Development Master Plan (“CDMP”), Parkland will not only “pay its own way” in terms of infrastructure and ongoing governmental services, but will also serve as a model for all future growth and comprehensive planning in Dade County.

Sound Planning

The Parkland site contains sufficient land area to undertake proper community planning, representing one of the few remaining areas where large scale planning will be available in Miami-Dade County. Developing large-scale mixed-use projects such as Parkland provides the opportunity to create a sense of place and provide a full range of uses necessary for a sustainable green community.

Using sound planning principles, Parkland is designed to create an improved quality of life for its residents as well as residents of the surrounding West Kendall community. Similar to Miami Lakes and Coral Gables, Parkland will create an opportunity for residents to work, shop, play, and learn in the same area in which they live, with the added value of living in a sustainable and efficient green community.

Parkland will provide housing for working families in an area where employment opportunities exist. Parkland will also develop a diverse employment center that will create a critical mass of well paying jobs that will allow people to live and work in the community, thereby encouraging a pedestrian friendly community that reduces auto dependency.

Parkland is cognizant and committed to the enhancement of the natural and built environments without adversely impacting environmental resources and without causing an undue burden on County facilities and services. The development plan for Parkland will ensure that public infrastructure and implementation of services occur concurrently with new development.

Green Development

Parkland will be one of the first projects of its size and price range in South Florida, and the first in Miami-Dade County, to implement the Florida Green Building Coalition’s Green Development Standards.

Provision of Infrastructure

The Parkland development plan is comprehensive in its approach to every aspect of community planning and will ensure that development occurs in a logical, consistent, and timely manner. The development of the Parkland community will provide for the following major public infrastructure and facilities serving both Parkland residents and residents of the wider West Kendall area:

- Functional and readily accessible parks, open space areas, trails, and greenways;
- Schools, police and fire facilities, and a community center;
- Medical facility, transit services, and a transit hub;
- Multi-modal connections to surrounding areas; and

- Roadway connections and expansions that will add needed capacity to the area's network.

Information Sought by Department

In the various discussions that Parkland's representatives have had with Department of Planning and Zoning, several requests for additional information have been made by the Department. This document is intended to respond to these requests in a comprehensive manner. The following issues are discussed herein:

- The commitments that the applicants have agreed to accept as conditions to the Parkland DRI Development Order;
- An analysis of the travel time from Parkland to the County's employment areas, including a comparison of travel times with one of the County's Community Urban Centers;
- A discussion of the current and planned status of premium transit in the area adjacent to Parkland;
- An analysis of the legal and economic issues surrounding the CDMP's policy protecting viable agricultural lands;
- A discussion of the compliance of the Parkland application with the policies of the CDMP that guide decision-making on the expansion of the UDB;
- Information related to the need for a hospital on the Parkland site; and
- A response to a recent letter from the National Park Service regarding the impact of Parkland on Everglades and Biscayne National Parks.

Conclusion

The Parkland team believes that Parkland will serve as a model for the future planning of Miami-Dade County. Expansion of the County's UDB should be conducted in a manner that ensures the creation of communities that provide for the infrastructure needs of their residents without unduly burdening the remainder of the County. Moreover, future development must be as environmentally sustainable as possible. Parkland will be the example of how Miami-Dade County can continue to grow the right way.

I. DEVELOPMENT ORDER COMMITMENTS

Parkland 2014 is a proposed mixed-use, “green development” community that has been meticulously planned to address Miami-Dade County growth and infrastructure needs through project build out and as of the year 2014, when the first certificates of occupancy will be issued. By proceeding through the DRI process concurrently with the CDMP Amendment Application, Parkland can commit to providing the infrastructure needed to support development impacts and ongoing governmental services while serving as a model for all future applications to expand the UDB as well as for future County review of new development applications.

A. Certificates of Occupancy

Parkland commits that the first certificates of occupancy/certificates of completion for project land uses will be issued no earlier than the Year 2014.

B. Parks & Open Space

Parkland will create 201.5 acres of new parks, lakes, and wildlife habitat, as conceptually identified on the Master Plan attached hereto as **Exhibit I-1**.

The lake edges and open spaces will be designed as environmental enhancement areas so as to encourage wildlife utilization.

The Applicant will design its linear park system to connect to the adjacent portions of the County’s bikeway and greenway network. The Applicant will build the bikeways, pathways and trails located adjacent to and within the project site, so that connections to the County’s bikeway and greenway network can be made from the project access roadways. The Applicant will construct the bikeways, pathways and trails located along the following roadways:

- S.W. 152 Street from S.W. 177 Avenue to S.W. 157 Avenue
- S.W. 144 Street from S.W. 177 Avenue to S.W. 162 Avenue
- S.W. 136 Street from S.W. 177 Avenue to S.W. 157 Avenue
- S.W. 177 Avenue from S.W. 152 Street to S.W. 136 Street
- S.W. 167 Avenue from S.W. 152 Street to S.W. 136 Street
- S.W. 162 Avenue from S.W. 152 Street to S.W. 136 Street

Bikeway facilities along each of the above referenced roadways will allow for connections to the South Dade Greenway Network that extends west on S.W. 136 Street (west of S.W. 177 Avenue) and planned bikeway facilities along S.W. 177 Avenue and S.W. 162 Avenue.

C. Community Facilities

The Applicant will provide approximately two acres for and will construct a joint police and fire facility as per the Green Development Standards. See location designated on the Master Plan attached hereto as **Exhibit I-1**.

D. Green Development

Parkland will be one of the first communities in South Florida, and the first in Miami-Dade County, to implement the Florida Green Building Coalition's Green Development Standards (Green Building)

Parkland will implement the following Green Building elements:

- Create ecosystems and conserve natural resources
- Create a green non-vehicular circulation system
- Employ green utilities practices
- Provide green community amenities
- Provide green building covenants for all homes
- Homes will be constructed using healthy home guidelines, and will be energy efficient.
- The building materials will feature green material choices.
- Provide green education elements throughout community
- Employ wastewater reuse for irrigation of public ROW
- Provide 100 percent non potable water for it's irrigation needs
- Homes will be 10 – 15 percent more efficient than current Florida Energy Code requires

E. Schools

The Applicant will provide land for the following schools:

- K-8 School 1 - 1,600 student stations
- K-8 School 2 - 1,600 student stations
- High School - 1,600 student stations

In the event that an agreement can be reached with Miami-Dade County Public Schools, Parkland will mitigate its impact on public educational facilities to the full extent permitted under the School Board's current voluntary mitigation procedure. This mitigation shall include a any combination of the following: (1) a monetary donation to cover the full capital costs of serving the public school students that will be generated by Parkland; (2) a land donation; and/or (3) the construction of a Miami-Dade County Public school facility. The Applicant would reserve the right to construct charter schools to provide additional student stations.

In the event that an agreement cannot be reached with Miami-Dade County Public Schools under the current mitigation procedure, Parkland will mitigate its school impacts under the to-be-determined public school concurrency system currently being negotiated between Miami-Dade County and Miami-Dade County Public Schools.

Because the Interlocal Agreement for Public School Facility Planning between Miami-Dade County and Miami-Dade County Public Schools and the County's CDMP Educational Element, which together will govern the County's school concurrency program, are not yet finalized, it is impossible for the Applicant to describe the mitigation plan at this time.

However, the Applicant anticipates that mitigation under a school concurrency management system may include any combination of the following: (1) the construction of one or more Miami-Dade County Public school facilities; (2) the construction of one or more public charter schools; and/or (3) monetary or land donations.

F. Hurricane Preparedness

The development program includes a High School that will be designed to serve a dual purpose as a Hurricane Evacuation Shelter. The facility is anticipated to increase the Miami-Dade County Shelter Capacity by 1,500 persons, thus the project will provide adequate shelter capacity for its residents in the unlikely event that 70 percent of Parkland residents choose to evacuate.

G. Transit

The Applicant will coordinate with Miami Dade Transit (MDT) to extend peak hour Metrobus service into Parkland. The Applicant will dedicate the land area needed for a transit terminal adjacent to the CSX rail corridor as conceptually identified on the Master Plan attached hereto as **Exhibit I-1**. The Applicant will coordinate with MDT and the South Florida Regional Transportation Authority (SFRTA) to design a joint development transit terminal and parking facility so that the parking areas serving the adjacent employment uses can (in part) be used to help meet the parking demand for the transit terminal if and when transit service is extended to the site. The Applicant will coordinate with MDT and the SFRTA to refine the transit terminal footprint and the parking, circulation and drop-off areas.

Please note that to provide a conservative transportation analysis, no transit capture (i.e. reduction in external vehicular trips) has been proposed for Parkland based upon the use of Miami-Dade Transit bus service or the use of a commuter rail transit system.

H. Transportation

Vehicular access to the off-site roadway network shall be consistent with the vehicle access locations shown on **Exhibit I-1**. The location and number of project driveways may be adjusted (consistent with County and State standards) based upon the review and approval of those agencies with jurisdiction over the adjacent off-site roadway network.

The Applicant shall construct or cause to be constructed the roadway improvements described in **Exhibit I-2** attached hereto. The Applicant shall phase the construction of these improvements, (pursuant to Rule 9J-2.045, FAC) as set forth in **Exhibit I-2**, in accordance with the issuance of building permits generating net external PM peak hour trips for development within Parkland, as calculated using the net external PM peak hour trip rates set forth on **Exhibit I-3** attached hereto.



Note: Exhibit I-1 provides the conceptual layout of project land uses, the roadway network that would provide access to the site and the location and layout of lakes, canals, parks and schools recognizing that the final layout for all project land uses, roadways, lakes, canals, parks and schools would occur during the development review process with the local government of jurisdiction at the time of site plan approval and with permitting agencies during consideration of appropriate permit applications.

- Low Density Mix (single family/townhome)
 - Low Medium Density Mix (townhome/multi-family)
 - Medium Density Mix (multi-family)
 - Park
 - Schools
 - Retail, Office & Services
 - Industrial-Flex Space
 - Medical Office & Hospital
-
- Access to SW 177 Avenue from SW 144 Street to be phased in coordination with Miami-Dade County and FDOT.
 - Proposed site access locations to the surrounding roadway network. Other access locations may be provided pursuant to meeting the design and permitting standards and guidelines from Miami-Dade County and FDOT.
 - Transit Center
 - CSX Rail Corridor

**EXHIBIT I-2
TIMING OF ROADWAY IMPROVEMENTS BASED UPON TRIP THRESHOLDS**

No.	Roadway Improvement Location	On-Site vs. Off-Site	Type of Improvement	[5] PM Trip Threshold for Improvement	Estimated Cost Per Unit Mile	Estimated Cost	Design and Permitting at 10%	Total Estimated Costs	Segment Length in Miles	Lane Miles Off-Site	Lane Miles On-Site	Lane Miles Total
1	SW 152 St - SW 177 Ave to SW 162 Ave	2L On-Site, 4L Off-Site	Build a new 6 lane divided roadway	Access	\$3,500,000	\$5,250,000	\$525,000	\$5,775,000	1.50	6.00	3.00	9.00
2	SW 152 St - SW 162 Ave to SW 157 Ave	Off-Site	Widened from 2LU to 6LD	3,072	\$3,500,000	\$1,750,000	\$175,000	\$1,925,000	0.50	3.00	0.00	3.00
3	SW 152 St - SW 157 Ave to SW 147 Ave	Off-Site	Widened from 2LU to 5LD, with 3 EB lanes, 2 WB lanes [1]	3,002	\$3,500,000	\$3,500,000	\$350,000	\$3,850,000	1.00	5.00	0.00	5.00
4	SW 152 St - SW 147 Ave to SW 137 Ave	Off-Site	Widened from 4LD to 5LD, with 3 EB lanes, 2 WB lanes [1]	4,156	\$3,500,000	\$3,500,000	\$350,000	\$3,850,000	1.00	1.00	0.00	1.00
5	SW 152 St - SW 117 Ave to HEFT	Off-Site	Restripes/Widened from 4LD to 6LD [3]	1,438	\$3,500,000	\$875,000	\$87,500	\$962,500	0.25	0.50	0.00	0.50
6	SW 136 St - SW 177 Ave to SW 162 Ave	2L On-Site, 2L Off-Site	Build a new 4 lane divided roadway	Access	\$2,500,000	\$3,750,000	\$375,000	\$4,125,000	1.50	3.00	3.00	6.00
7	SW 136 St - SW 162 Ave to SW 157 Ave	Off-Site	Build a new 4 lane divided roadway	3,607	\$2,500,000	\$1,250,000	\$125,000	\$1,375,000	0.50	2.00	0.00	2.00
8	SW 136 St - SW 157 Ave to SW 137 Ave	Off-Site	Widened from a 4LD to a 5LD, with 3 WB lanes, 2 EB lanes, 2 SB Free Flow Right Turn Lane and/or NB left turn lane [3]	4,156	\$1,000,000	\$2,000,000	\$200,000	\$2,200,000	2.00	2.00	0.00	2.00
9	SW 117 Ave - HEFT to SW 152 St	Off-Site	Widened from 2LU to a 4LD	2,383	n/a	\$1,500,000	\$150,000	\$1,650,000	0.25	0.50	0.00	0.50
10	SW 184 St - SW 157 Ave to SW 147 Ave	Off-Site	Widened from 2LU to a 4LD	4,274	\$2,500,000	\$2,500,000	\$250,000	\$2,750,000	1.00	2.00	0.00	2.00
11A	SW 177 Ave - SW 136 St to SW 152 St	Off-Site	3 Acres of additional ROW for the 4LD FHHS Cross Section [4]	2,430				\$1,575,000	1.00	4.00	0.00	4.00
11B	SW 177 Ave - SW 136 St to SW 152 St	Off-Site	Build the New 4LD FHHS Cross Section [4]	2,430	\$6,000,000	\$6,000,000	\$600,000	\$6,600,000	1.00	4.00	0.00	4.00
12	SW 172 Ave - SW 136 St to CSX	On-Site	New 4 lane divided roadway	Access	\$2,500,000	\$375,000	\$37,500	\$412,500	0.15	0.00	0.60	0.60
13	SW 172 Ave - CSX to SW 152 St	On-Site	New 4 lane divided roadway	Access	\$2,500,000	\$2,125,000	\$212,500	\$2,337,500	0.85	0.00	3.40	3.40
14	SW 167 Ave - SW 136 St to SW 152 St	On-Site	New 4 lane divided roadway	Access	\$2,500,000	\$2,500,000	\$250,000	\$2,750,000	1.00	0.00	4.00	4.00
15	SW 162 Ave - SW 136 St to SW 144 St	2L On-Site, 2L Off-Site	New 4 lane divided roadway	Access	\$2,500,000	\$1,250,000	\$125,000	\$1,375,000	0.50	1.00	1.00	2.00
16	SW 144 St - SW 144 St to SW 152 St	On-Site	Widened from 2LU to 4LD	Access	\$2,500,000	\$1,250,000	\$125,000	\$1,375,000	0.50	0.00	1.00	1.00
17	SW 144 St - SW 177 Ave to SW 162 Ave	On-Site	New 4 lane divided roadway	Access	\$2,500,000	\$3,750,000	\$375,000	\$4,125,000	1.50	0.00	6.00	6.00
18	SW 136 Street at SW 177 Avenue	Off-Site	New Signal when warranted and permitted		\$325,000	\$32,500	\$3,250	\$357,500	0.00	0.00	0.00	0.00
19	SW 136 Street at SW 167 Avenue	Access Signal	New Signal when warranted and permitted		\$200,000	\$20,000	\$2,000	\$220,000	0.00	0.00	0.00	0.00
20	SW 152 Street at SW 177 Avenue	Off-Site	New Signal when warranted and permitted		\$325,000	\$32,500	\$3,250	\$357,500	0.00	0.00	0.00	0.00
21	SW 152 Street at SW 167 Avenue	Access Signal	New Signal when warranted and permitted		\$200,000	\$20,000	\$2,000	\$220,000	0.00	0.00	0.00	0.00
22	SW 184 Street at SW 157 Avenue	Off-Site	New Signal when warranted and permitted		\$200,000	\$20,000	\$2,000	\$220,000	0.00	0.00	0.00	0.00
Total Estimated Off-Site Costs:										34.00		
Total Estimated On-Site or Access Related Costs:											22.00	
Total Estimated Costs:												56.00

[1] A 5LD cross section has been proposed for SW 152 Street between SW 157 Avenue and SW 137 Avenue. In lieu of a 6LD roadway expansion on SW 152 Street. This roadway improvement is proposed in order to avoid changing the pedestrian pathway and landscaped buffer which currently exists within the zoned ROW along the north side of SW 152 Street between SW 157 Avenue and SW 137 Avenue. The 5LD cross section on SW 152 Street (with 2 lanes westbound and 3 lanes eastbound) provides adequate roadway capacity to accommodate the impacts of the Parkland project.

[2] The 5LD cross section on SW 136 Street (with 3 lanes westbound and 2 lanes eastbound) provides additional roadway capacity above and beyond what is needed for the Parkland DRI, and is subject to ROW availability from the Miami-Dade Aviation Department. If ROW can be obtained, the improvement would be constructed in coordination with improvement No. 4 above.

[3] Coordinate with Florida's Turnpike and Miami-Dade County.

[4] At FDOT's request, Parkland will dedicate additional ROW for SW 177 Avenue (beyond the required zoned ROW dedications) to accommodate the FHHS cross section. The additional dedication equates to 3 acres at \$525,000 per acre.

[5] The PM Peak Hour improvement thresholds are based upon either the project's consumption of future available capacity, or the trip threshold that equates to 5.0% of maximum service volume.

**EXHIBIT I-3
PARKLAND
NET EXTERNAL PM PEAK HOUR TRIP RATES**

07-Aug-08

LAND USE	UNITS	ITE LUC	[1] ITE 7TH EDITION RATE OR FORMULA	[1] GROSS PM TRIPS	[1] INTERNAL TRIP RATE	[1] INTERNAL PM TRIPS	NET EXTERNAL PM TRIPS	NET EXTERNAL PM TRIP RATE
RESIDENTIAL								
SINGLE FAMILY	1,257 DU	210	$T = 1.01 (X)$	1,270	17.41%	221	1,049	0.83
TOWNHOUSE	2,436 DU	230	$T = 0.52 (X)$	1,267	17.41%	221	1,046	0.43
CONDOMINIUM	3,248 DU	230	$T = 0.52 (X)$	1,689	17.41%	294	1,395	0.43
RETAIL [2]	200,000 SQ. FT.	820	$\ln (T) = 0.66 \ln (X) + 3.40$	989	32.03%	317	672	3.36
MEDICAL OFFICE	100,000 SQ. FT.	720	$T = 3.72 (X)$	372	19.03%	71	301	3.01
HOSPITAL	200 BEDS	610	$T = 1.3 (X)$	260	19.03%	49	211	1.05
INDUSTRIAL - FLEX SPACE	550,000 SQ. FT.	130	$T = 0.86 (X)$	473	10.00%	47	426	0.77
K-8 SCHOOL	3,200 Students	522	$T = 0.15 (X)$	480	52.58%	252	228	0.07
HIGH SCHOOL	1,600 Students	530	$T = 0.14 (X)$	224	52.58%	117	107	0.07
COMMUNITY USES	50,000 SQ. FT.	495	$T = 1.64 (X)$	82	52.58%	43	38	0.77
PARKS	67.6 ACRES	412	$T = 0.06 (X)$	4	52.58%	2	2	0.03
TRIPS:				7,110		1,635	5,475	
<p>[1] The ITE trip rates and formulas, the internalization assumptions, the internal trips and the resulting external trips are consistent with the Trip Generation Analysis approved for Parkland by the local and regional reviewing agencies as part of the DRI process.</p> <p>[2] The Net External PM Peak Hour Trip Rate for Cinema (as an exchange with the retail use) is provided below:</p>								
CINEMA	2,000 SEATS	444	$T = 0.07 (X)$	140	32.03%	45	95	0.05

I. Workforce Housing

Parkland will include a minimum of 800 “affordable workforce housing” units within the Project, which is equivalent to more than 10 percent of the proposed residential units. These affordable workforce housing units shall be completed in accordance with the following schedule:

- a. Prior to the issuance of the final certificate of occupancy for the 1,750th residential unit within the Project, construct or cause the construction of a minimum of 200 affordable housing units.
- b. Prior to the issuance of the final certificate of occupancy for the 3,500th residential unit within the Project, construct or cause the construction of an additional 200 affordable workforce housing units (for a total of 400 affordable workforce housing units).
- c. Prior to the final certificate of occupancy for the 5,250th residential unit within the Project, construct or cause the construction of an additional 200 affordable workforce housing units (for a total of 600 affordable workforce housing units).
- d. Prior to the final certificate of occupancy for the 6,900th residential unit within the Project, construct or cause the construction of an additional 200 affordable workforce housing units (for a total of 800 affordable workforce housing units).

For the purpose of satisfying this condition, “affordable workforce housing” units are as defined in section 380.0651(3) (j), Florida Statutes. Nothing shall preclude the Applicant of availing itself of any governmental or other applicable grant or assistance programs to satisfy this condition.

J. Potable Water

Miami-Dade Water and Sewer Department (MDWASD) is currently working on a water capacity allocation system that will be modeled on its existing sewer capacity allocation system. As a result, the issuance of all Parkland building permits will be conditioned upon available water supply capacity. In addition, the Applicant proposes Development Order (DO) conditions linking the number of units to available and permitted water supply, and requiring that potable water treatment plant capacity be available to serve the project prior to authorizing certificates of occupancy, pursuant to Section 163.3180(2)(a), Florida Statutes, and consistent with Miami-Dade County’s existing Consumptive Use Permit issued in December of 2007.

K. Water Conservation

Parkland will use appropriate water conservation devices and methods. Such devices may include, but are not limited to, low-flow plumbing fixtures such as those listed in Section 604.4 of the Florida Building Code, other water conservation measures described by Environmental Protection Agency (the “EPA”) regulations, and, where feasible, cisterns to capture rainwater for irrigation for single family detached and attached homes. In addition, during periods of severe water shortage, Parkland 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.

Parkland will not be employing potable water for irrigation of single family attached and detached dwellings. By using non-potable water for irrigation needs, it is estimated that the potable water demand of these residences will be reduced anywhere from forty (40) to fifty (50) percent. This would represent a potable water savings of approximately 335,000 to 419,000 gallons per day.

In order to accommodate the growing population of Miami-Dade County, Parkland is committed to working with the South Florida Water Management District (SFWMD) and MDWASD in developing an on-site reuse facility and conserving the current potable water supply. Parkland shall comply with all SFWMD, Department of Environmental Resources Management (DERM) and MDWASD rules and regulations. In addition, Parkland shall where feasible and practicable:

- (a) Design and construct buildings with minimal impact on site topography and natural drainage ways;
- (b) Disturb only areas needed to install foundations and roadways;
- (c) Install anti-backsiphoning valves between well and water pipes;
- (d) Maintain a naturally vegetated buffer next to lakes, ponds and wetlands;
- (e) Maximize permeable materials for driveway, walkways and porches;
- (f) Use silt fencing or biofiltration (permeable bags filled with chips, compost or bales of straw) to control erosion during construction;
- (g) Designate appropriate locations for washing vehicles and equipment during construction – away from surface waters, storm drains and slopes that could erode;
- (h) Immediately repair all equipment and vehicle leaks during construction;
- (i) Will use low-flow equipment for toilets, showers, and faucets in a manner consistent with the EPA Water Sensible Standards;
- (j) Will use water efficient appliances and equipment in a manner consistent with the EPA Water Sensible Standards;
- (k) Will direct runoff from roofs toward landscaping and away from foundation rather than down storm drains (reduces water use and well as storm water and pollutant runoff).
- (l) Provide all single family detached homes, when feasible, with a minimum 50 gallon cistern. Where feasible, cisterns will also be used in other residential development and other uses such as commercial; and
- (l) Provide native trees and shrubs and utilize xeriscape landscape principles, as appropriate, for greatest drought resistance.

With these conservation measures, Parkland will result in a 2.1 MGD decrease in water impacts on the South Florida area.

Parkland will exceed the requirements of the County's new water use efficiency standards manual when it comes into effect. Presently, the water use efficiency standards manual is scheduled to be published on January 1, 2009, and will become effective following approval by the County Commission.

L. Wastewater Management

The issuance of all building permits shall be conditioned upon the availability of allocations of wastewater treatment plant capacity. As a result of the water conservation measures described above, Parkland's wastewater treatment demand would be reduced by 20 percent, from 1.871 MGD to 1.497 MGD. Of this resulting 1.497 MGD of wastewater treatment demand, 25 percent (.375 MGD) will be recaptured for treatment and irrigation of areas within public rights of way. Thus, 1.122 MGD of sewage flow would return to the WASD system, while .375 MGD would be treated and used for irrigation.

The proposed 25 percent wastewater reduction will be realized through the use of a satellite reuse treatment facility located on-site. The proposed treatment facility will be located in close proximity to the manifold force main through which the Project's wastewater flow will be transmitted to existing WASD facilities. The location of this manifold force main has not yet been determined. It is anticipated that the reuse facility will be located on a site approximately one-half acre in size and the proposed technology will be membrane filtration. "Purple pipe" will be used to distribute the reuse water to the areas in which the water will be employed for irrigation.

Although the operating entity for the satellite facility has not yet been determined, it is proposed that the facility will be built by the developer and operated by MDWASD as part of their regional facility, thereby providing MDWASD with reuse credits for their system. It is anticipated that the details of ownership, operation and maintenance will be included in the developer's service agreement with MDWASD.

Based on water conservation measures and the commitment of Parkland to reuse a portion of its wastewater generation, the project will represent an approximate 40 percent reduction in wastewater demand. As such, Parkland will represent a model for water conservation and reuse for all future County development.

M. Stormwater Management

Parkland proposes to contain 100 percent of the 100-year, 3-day storm event on-site without any off-site discharge. This commitment far exceeds the flood protection requirement for this site, which is only to contain runoff from a 25-year, 3-day storm event. Therefore Parkland will not contribute to any off-site flooding. The additional stormwater retained on site will reduce the amount of stormwater runoff that would typically be discharged into the County's canal system and subsequently discharged into the Atlantic Ocean. The additional water being retained on site will also be beneficial to groundwater recharge.

Once final groundwater elevations from Combined Structural Operating Permit (CSOP) are known, Parkland's flood routing and drainage calculations can be adjusted to include this information. The design will be modified accordingly.

The proposed French drain system will be designed so that, at a minimum, the first inch of runoff will be treated before overflows are allowed to the lakes. The stormwater runoff will be further treated by the use of grass swales in the residential streets and grease baffles in parking areas. Currently, the site provides no treatment of stormwater runoff.

All drainage systems within public right-of-ways will be owned and maintained by the Miami-Dade County Public Works Department. The homeowners association(s) ("HOAs") will own and

maintain the drainage system located within private roads. The HOAs will also own and maintain the lakes and outfall structures that are part of the overall stormwater management system.

The proposed drainage improvements, including detention swales and exfiltration trenches, will cleanse storm water before it is returned to the ground water table, or discharged to on-site lakes in accordance with SFWMD and DERM requirements.

N. Economic Disparity

The South Florida Regional Planning Council (SFRPC) has established as a goal the elimination of extreme economic disparity among the segments of South Florida's diverse population. The Applicant recognizes that Parkland provides an opportunity to make steps toward the achievement of the Council's goal and will use its best efforts to realize that opportunity.

Construction hiring will likely be the responsibility of many contractors and sub-contractors. The Applicant will encourage the general contractors to award work to minority-owned sub-contractors at significant levels to that extent that doing so does not compromise their ability to complete their segments of the project within budget and in accordance with specifications.

When construction is completed, the responsibility of hiring the on-site workforce will lie with the businesses and institutions that occupy the proposed commercial facilities and that operate its hospital. The Applicant will encourage these businesses to be inclusive in their hiring practices and will use its best efforts to make them aware of the small and minority business resource organizations active in the community.

O. Blasting

Blasting will not be used for lake excavation.

P. Environmental

The Applicant is aware that Parkland is located in an area of agricultural activity with historical usage of arsenical-based pesticides and herbicides. Prior to conducting ground disturbing activities, the Applicant will submit results of any environmental testing activities and comply with all applicable permitting requirements.

The Applicant also acknowledges that any existing wells, fuel tanks, and pumps will have to properly abandoned or removed from the site and permitted through DERM, SFWMD, and the Florida Department of Environmental Protection (FDEP).

The Applicant acknowledges that any existing wells that are not needed will be properly abandoned and plugged with neat cement grout.

Q. Hazardous Materials

At the present time, there are no plans for Parkland to contain laboratories, storage facilities, or warehouse space where significant quantities of hazardous materials may be generated or utilized. No uses are anticipated for Parkland that will have a “significant hazardous material usage impact” as defined in Rules 9J-2.044(2) (f) and (5) (a) of the Florida Administrative Code.

If drums, solid wastes, tanks or potentially contaminated soils are encountered, they will be isolated and cleaned up as per the appropriate DERM and FDEP rules and guidelines, including the preparation and approval of a Contamination Assessment report and Remedial Action Plan, if necessary.

R. Biohazardous Materials

Prior to the issuance of a certificate of occupancy for any hospital use that will entail any significant hazardous material usage, the owner, developer, or leaseholder, will submit, as required, a Hazardous Materials Management Plan (HMMP) for review and approval by DERM, DEP, and the SFRPC, which conforms to the requirements of Rule 9J-2.044(5)(b)2 of the Florida Administrative Code and applicable County regulations. A copy of this plan will also be provided to the Miami-Dade Fire Department and shall be incorporated into the development by recorded restriction, lease, or other appropriate documentation.

The handling and disposal of biohazardous materials would be the responsibility of the facility generating the waste and a certified biohazardous waste disposal contractor will be utilized for disposal of this waste.

II. COMMUTATION – TRAVEL TIME ANALYSIS TO EMPLOYMENT AREAS

The materials below are provided to respond to questions raised by the Director of Planning and Zoning during a recent meeting with members of the Planning Department with respect to: 1) the likely commutation patterns of future Parkland residents; and 2) the travel time required to commute from Parkland to Downtown Miami. We recognize that commutation time is not utilized to evaluate the merits of an amendment to Miami-Dade County’s CDMP (given the lack of explicit standards with respect to “acceptable” commutation time), however we believe that this data will provide useful context information for the Department’s review of Parkland.

The data provided below with respect to commutation addresses travel by automobile, public transportation, and, in some instances, a combination of both. The research and data evaluated for this study revealed that the 30 percent of workers who live in the Kendall Area also work in the Kendall Area, making the Kendall employment center the largest employment center destination for Kendall Area residents. Based upon the fact that Downtown Miami is only one of a number of employment centers within Miami-Dade County --- and no longer the largest --- the Parkland planning team has provided data showing commutation times from Parkland to the following locations:

- Airport West/Doral Area (NW 36 Street at NW 87 Avenue);
- Downtown Coral Gables (Ponce de Leon Boulevard at Miracle Mile); and
- Downtown Miami (Government Center).

The Parkland planning team performed an independent commutation analysis in July 2008 consisting of travel time surveys to employment centers. For comparison, commutation data is provided for both Parkland and for the transit-oriented Princeton Community Urban Center (“CUC”). The Princeton CUC was selected for a comparative site because it is located in the middle of the three proposed CUC’s in Southern Miami-Dade County with the Cutler Ridge CUC to the north and the Naranja CUC to the south.

A. Commutation Patterns from the Kendall Area

In July 2006, Edwards and Kelcey (“E&K”), now Jacobs Edwards and Kelcey, a national transportation and traffic engineering firm, submitted a study to the Miami-Dade County Metropolitan Planning Organization that evaluated alternatives for cost-effective and enhanced transit service between the Kendall Area, (in which Parkland will be located when developed), and other key regional centers throughout the County. The area that E&K defined as Kendall, is delineated by the following boundaries:

- North: Dolphin Expressway (SR 836)/S.W. 8 Street
- East: Palmetto Expressway (SR 826)/South Dixie Highway (US-1)
- South: S.W. 152 Street
- West: S.W. 157 Avenue

According to the E&K study, the Kendall Area had approximately 519,000 residents in the year 2000, or approximately 23 percent of Miami-Dade County's total residents, including 233,000 workers over the age of 16 (see **Exhibit II-1(a)**). They also estimated that there were 303,000 people employed within the area, with nearly 67 percent in the service sector as compared to commercial or industrial sectors. For the purpose of their analysis, the service sector included all employment occupying office space, a number of significant employment centers including several major retail projects, the Baptist and Kendall Regional Medical Centers, and the industrial zone surrounding Tamiami Kendall Executive Airport.

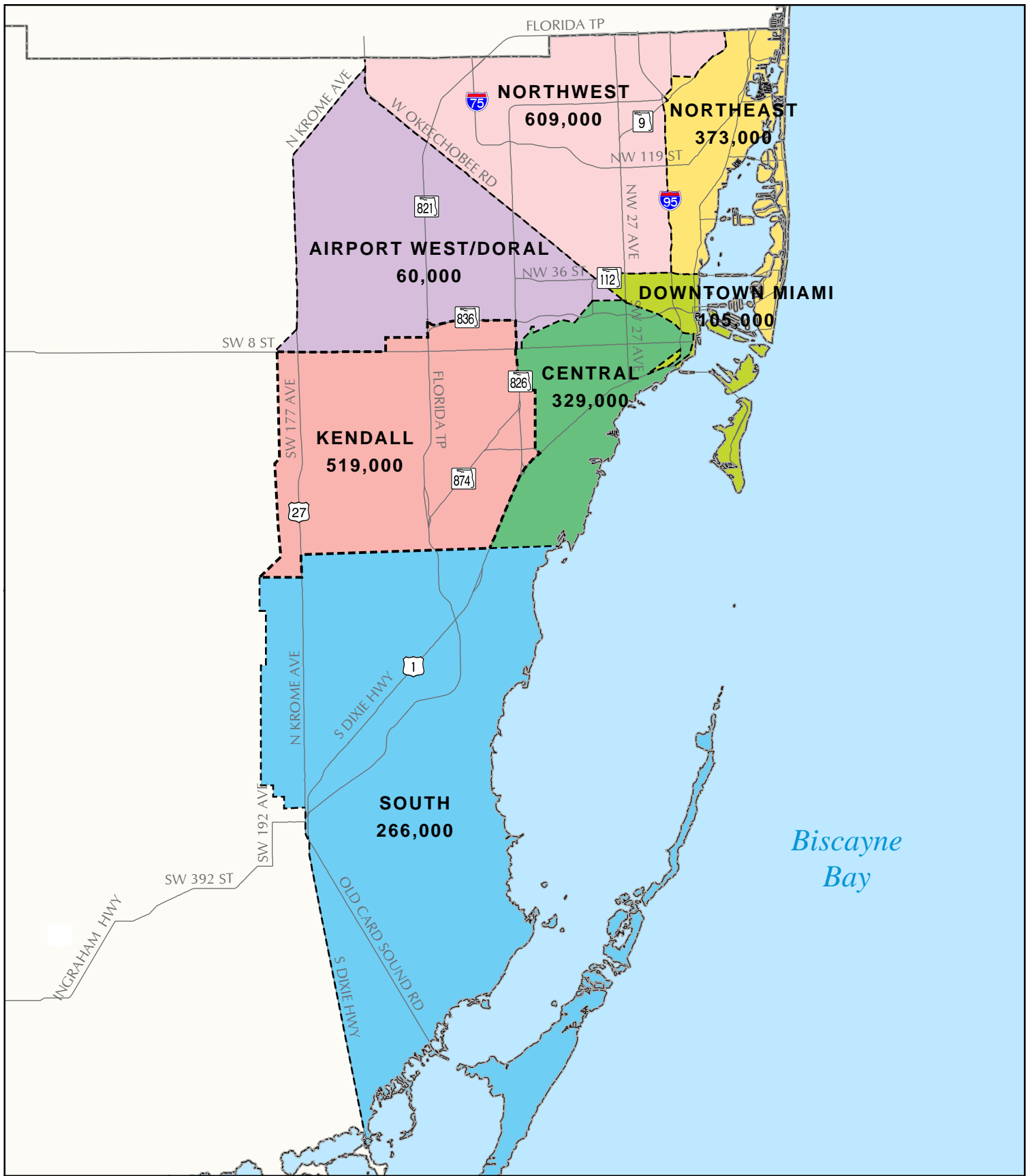
E&K estimated that the Kendall Area generated 221,000 work trips a day, or 28 percent of the County's daily total. Although the Kendall Area exported the largest number of work trips to other areas of the County, it is significant to note that 30 percent of workers who live in the Kendall Area also work in the area. **Thus the Kendall employment center constitutes the largest employment center destination for Kendall Area residents.** The percentage of workers both living and working in the Kendall Area may potentially increase over time as non-residential development in the vicinity of the Tamiami Kendall Executive Airport continues to occur and when major projects such as Kendall Town Center and Parkland are developed.

As shown in **Table II-1** below and as illustrated on **Exhibit II-1(b)**, E&K estimated that the Central Area was the destination capturing the largest portion of work trips leaving the Kendall Area, and included the areas of Coconut Grove, Coral Gables, South Miami, Pinecrest and Palmetto Bay. The Airport West/Doral area ranked as the second largest destination of work trips leaving the Kendall Area, with Downtown Miami ranked third.

Employment Destination	Percent	Ranking
Kendall	30.3	1 st
Central (Coconut Grove, Coral Gables, South Miami, Palmetto Bay)	19.9	2 nd
Airport West/Doral	17.2	3 rd
Downtown Miami	16.3	4 th
Northwest	7.5	5 th
Northeast Beaches	4.5	6 th
South	4.3	7 th
Total	100.0	

Source: *Edwards and Kelsey, Kendall Corridor Alternatives Analysis, 2006; Miami Economic Associates, Inc. and Cathy Sweetapple & Associates.*

E&K determined that the average Kendall resident spent 32.8 minutes traveling to work, or 1.7 minutes more than the average Miami-Dade County resident, with those living in the portion of the Kendall Area closest to Parkland, traveling an average of 39 minutes. It also found that the portion of Kendall residents using transit was less than the countywide average --- three percent as compared to five percent --- a situation that it attributed to the fact that Kendall Area residents had less transit options available to them and for which it recommended transit solutions.



Source: Miami-Dade County Kendall Corridor Alternatives Analysis, October 2006 prepared by Edwards and Kelcey; Adapted by The Curtis Group, 2008

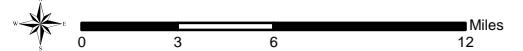
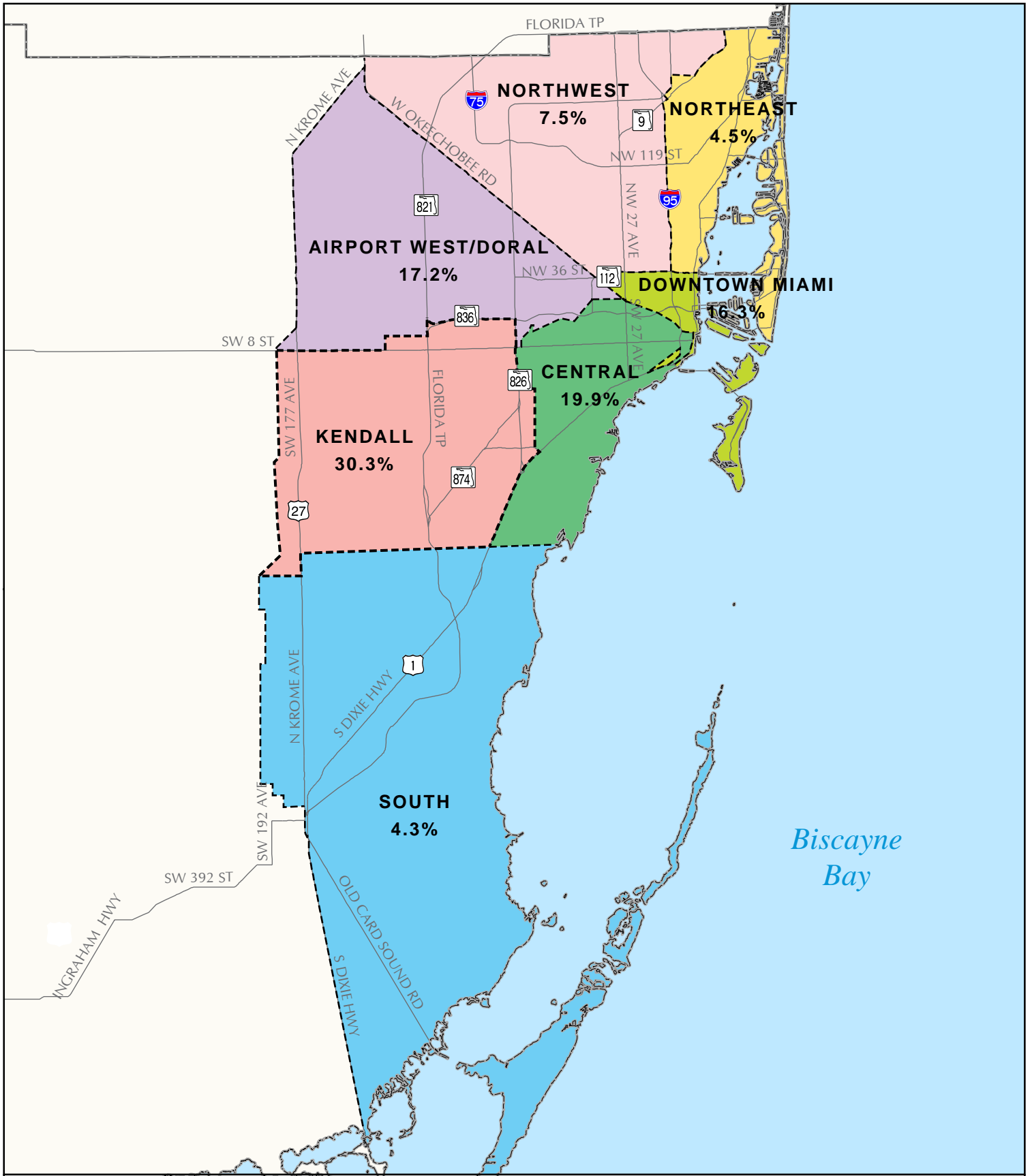


EXHIBIT II-1(a)
 MIAMI-DADE POPULATION BY AREA
 PARKLAND



Source: Miami-Dade County Kendall Corridor Alternatives Analysis, October 2006 prepared by Edwards and Kelcey; Adapted by The Curtis Group, 2008

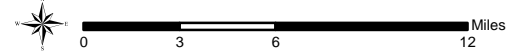


EXHIBIT II-1(b)
 WORK TRIP DISTRIBUTION FROM THE KENDALL AREA
 PARKLAND

B. Commutation Timeframes

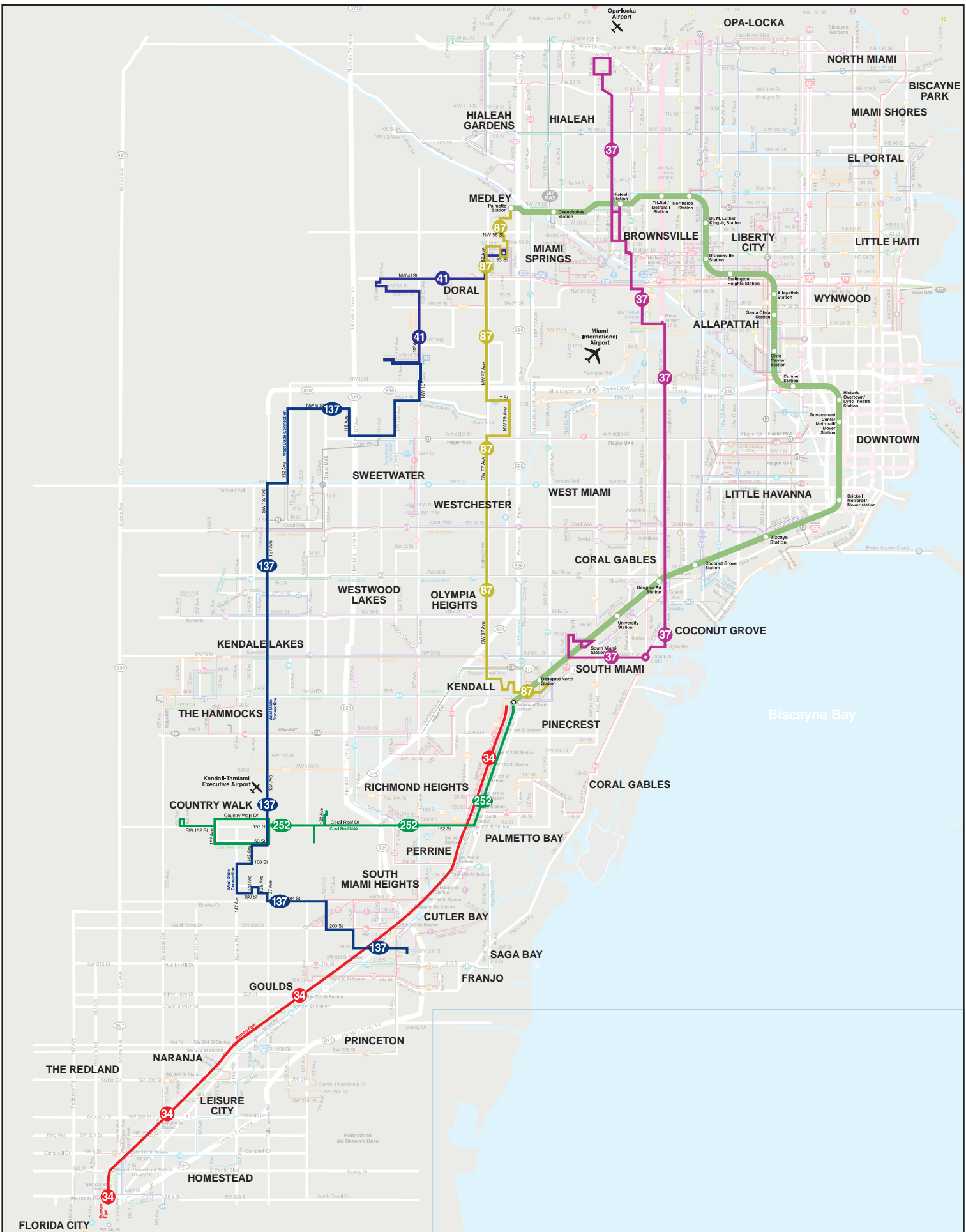
The E&K analysis found that more Kendall residents departed for work in the period from 7:00 AM to 7:30 AM than any other period during the morning peak. Accordingly, the Parkland independent commutation analysis consisted of travel time surveys to employment centers performed with all automobile trips commencing between 7:10 AM and 7:20 AM. We recognize that the period in which the analysis was performed is a period in which travel is lighter than other periods of the year, however, this condition has been applied equally for both Parkland and the Princeton CUC, and hence their comparative times are relevant. We also note that the automobile travel times indicated were generated using SunPass at all toll booths encountered.

C. Transit Travel Times

Table II-2 below summarizes and compares the travel time results using transit from both Parkland and the Princeton CUC for travel to the Airport West Doral Area (NW 36 Street at NW 87 Avenue), Downtown Coral Gables (Ponce de Leon Boulevard at Miracle Mile) and Downtown Miami (Government Center) utilizing transit solely or a combination of automobile to a park and ride facility and transit. The transit survey routes utilized are illustrated in enclosed **Exhibit II-2**.

Destination	Route	Time (Minutes)
Airport West/Doral		
	From: Parkland	
	Alt 1: Route 252 E, Route 137 N, Route 41 E	146
	Alt 2: Drive to 152/117 P&R, Metrorail N, Route 87 N	126
	From: Princeton CUC	
	Route 37 N, Route 87 N	109
Coral Gables		
	From: Parkland	
	Route 252 E, Metrorail, Route J-Be N	84
	From: Princeton CUC	
	Route 34N, Metrorail, Route J-Be N	76
Downtown Miami		
	From Parkland	
	Route 252 E, Metrorail N	74
	From: Princeton CUC	
	Route 34 N, Metrorail N	67

Source: Miami-Dade County Transit, Miami Economic Associates, Inc. and Cathy Sweetapple & Associates



FLORIDA CITY

EXHIBIT II-2
 Transit Survey Routes
 PARKLAND

The transit travel times from the Princeton CUC to all three employment destinations were found to be lower than the transit travel times from Parkland. These differences in commute times to Downtown Coral Gables and Downtown Miami are not significant when it is considered that the Princeton CUC is anticipated to be a prototype for transit-oriented development, being situated directly across US-1 from the South Dade Busway. It should be noted that this analysis assumes that a person boarding transit at the Princeton CUC would do so at the stop along the Busway Corridor at S.W. 244 Street, which is one of only five stops made by the Busway Flyer, an express service that operates during rush hour between S.W. 296 Street and the Dadeland South Metrorail Station. Finally, it should be noted that the commute even from the Princeton CUC under the most favorable of conditions to Airport West/Doral, the County's largest employment center, is over an hour and thirty minutes.

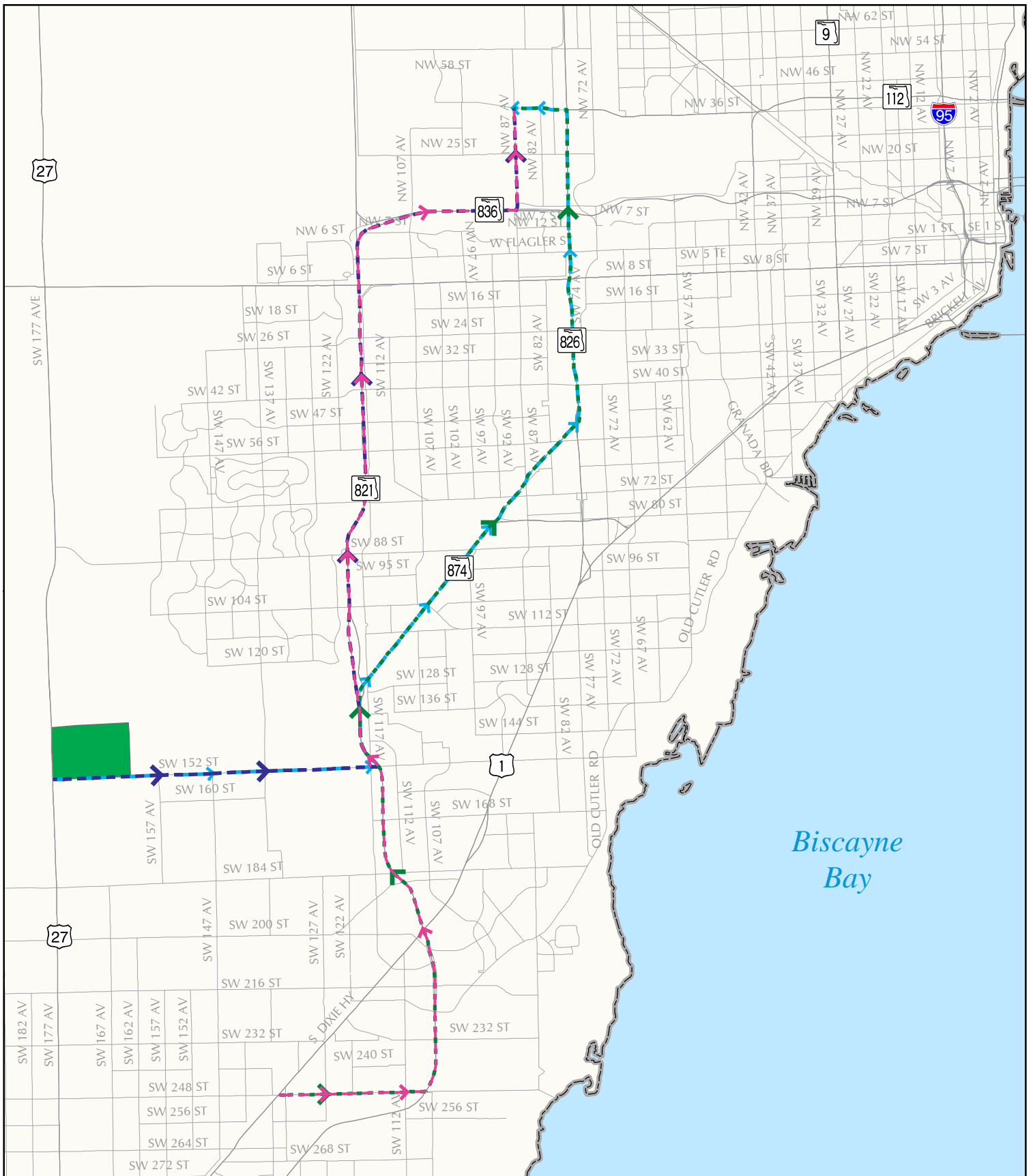
It will also be noted that all of the transit travel times shown in **Table II-2** are over one hour in duration. As indicated in **Table II-3** below, it took significantly less than an hour in travel time to commute by car from either Parkland or the Princeton CUC to the three employment destinations. It is unlikely that even in busier times of the year when school is in session, that the automobile travel times shown by this survey would exceed one hour, let alone equate to those recorded for transit. Accordingly, while County transit as currently configured is beneficial to the environment and is deemed cost effective for the transit rider compared to the cost of gasoline, it does not offer the savings in travel time for the commuter.

D. Automobile Travel Times

Table II-3 below summarizes and compares the automobile travel times from Parkland and the Princeton CUC to the Airport West Doral Area (NW 36 Street at NW 87 Avenue), Downtown Coral Gables (Ponce de Leon Boulevard at Miracle Mile) and Downtown Miami (Government Center). The automobile survey routes utilized are illustrated in **Exhibit II-3 (a)–(c)**.

Table II-3 Automobile Travel Times			
Route No.	Destination	Route	Time (Minutes)
	Airport West/Doral		
		From: Parkland	
1		Alt 1: SW 152 St E, Turnpike N, SR 874 N, SR 826 N, NW 36 St W	36
2		Alt 2: SW 152 St E, Turnpike N, SR 836 E, NW 87 Ave N	34
		From: Princeton CUC	
3		Alt 1: SW 248 St E, Turnpike N, SR 874 N, SR 826 N, NW 36 St W	41
4		Alt 2: SW 248 St, E, Turnpike N, SR 836 E, NW 87 Ave N	39
	Coral Gables		
		From: Parkland	
5		Alt 1: SW 152 St E, Turnpike N, SR 874 N, SR 826 N, SR 836 E, Le Jeune Rd S, Miracle Mile E	44
6		Alt 2: SW 152 St E, Turnpike N, SR 836 E, Le Jeune Rd S, Miracle Mile	41
		From: Princeton CUC	
7		Alt 1: SW 248 Street E, Turnpike N, SR 874 N, SR 826 N, SR 836 E, Le Jeune Rd S, Miracle Mile E	47
8		Alt 2: SW 248 St, E, Turnpike N, SR 836 E, Le Jeune Rd S, Miracle Mile	43
9		Alt 3: US-1 N, Ponce de Leon Blvd N	43
	Downtown Miami		
		From: Parkland	
10		Alt 1: SW 152 St E, Turnpike N, SR 874 N, SR 826 N, SR 836 E, I-95 S, NW 3 Ave S, NW 2 St E	48
11		Alt 2: SW 152 St E, Turnpike N, SR 836 E, I-95 S, NW 3 Ave S, NW 2 St E	45
		From: Princeton CUC	
12		Alt 1: SW 248 St E, Turnpike N, SR 874 N, SR 826 N, SR 836 E, I-95 S, NW 3 Ave S, NW 2 St E	52
13		Alt 2: SW 248 St, E, Turnpike N, SR 836 E, I-95 S, NW 3 Ave S, NW 2 St E	49
14		Alt 3: US-1 N, I-95 N, NW 3 Ave N, NW 2 St E	51

Source: Miami-Dade County Transit, Miami Economic Associates, Inc. and Cathy Sweetapple & Associates

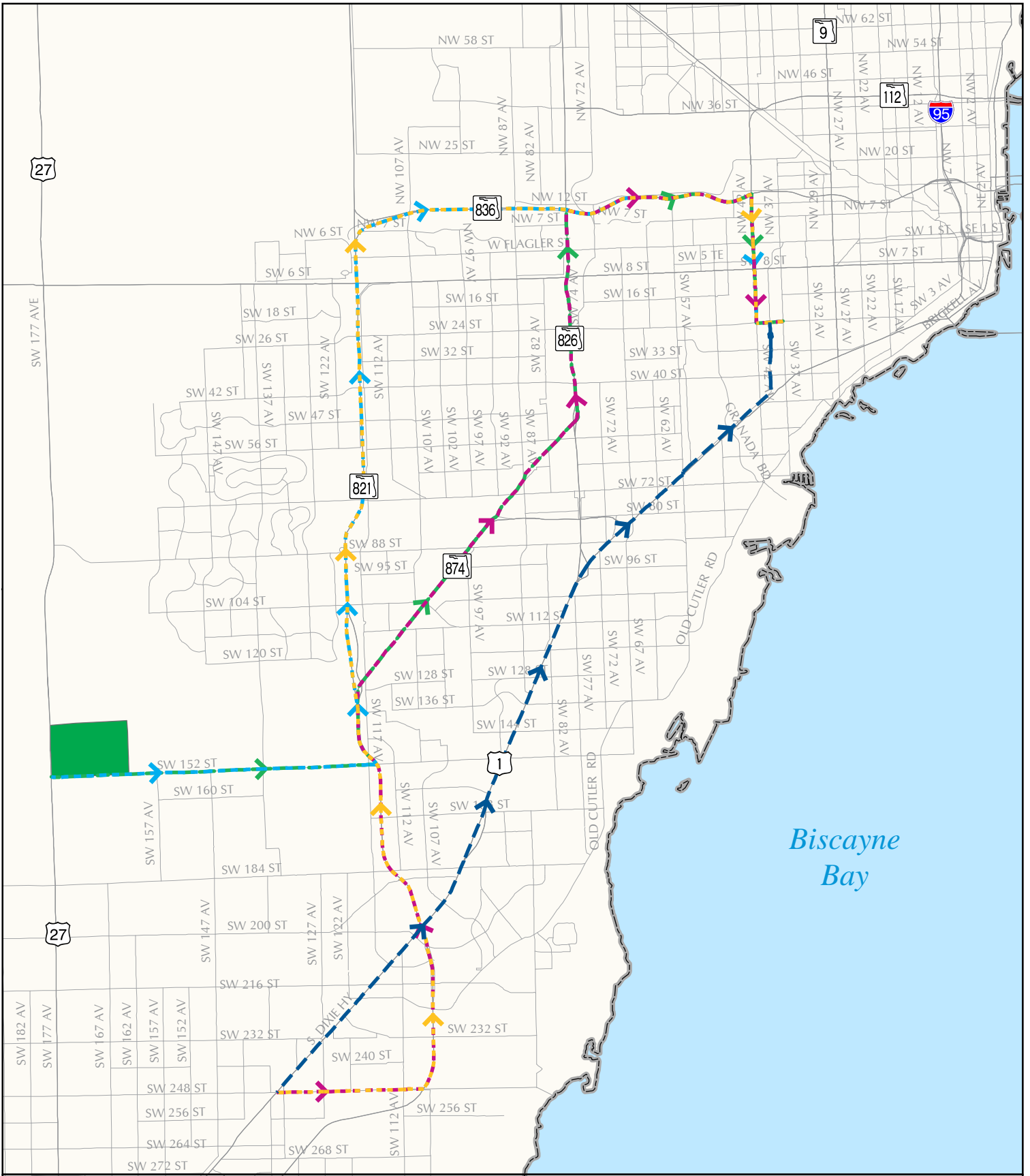


LEGEND

- | | |
|----------------------|---------------------------|
| From Parkland | From Princeton CUC |
| Route 1 | Route 3 |
| Route 2 | Route 4 |

Source: Miami-Dade GIS 2007; Adapted by The Curtis Group, 2008
 Miles

EXHIBIT II-3 (a)
Automobile Survey Routes - Airport West/Doral
PARKLAND



LEGEND

- | From Parkland | From Princeton CUC |
|---------------|--------------------|
| Route 5 | Route 7 |
| Route 6 | Route 8 |
| | Route 9 |



Source: Miami-Dade GIS 2007; Adapted by The Curtis Group, 2008

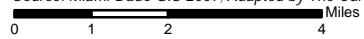
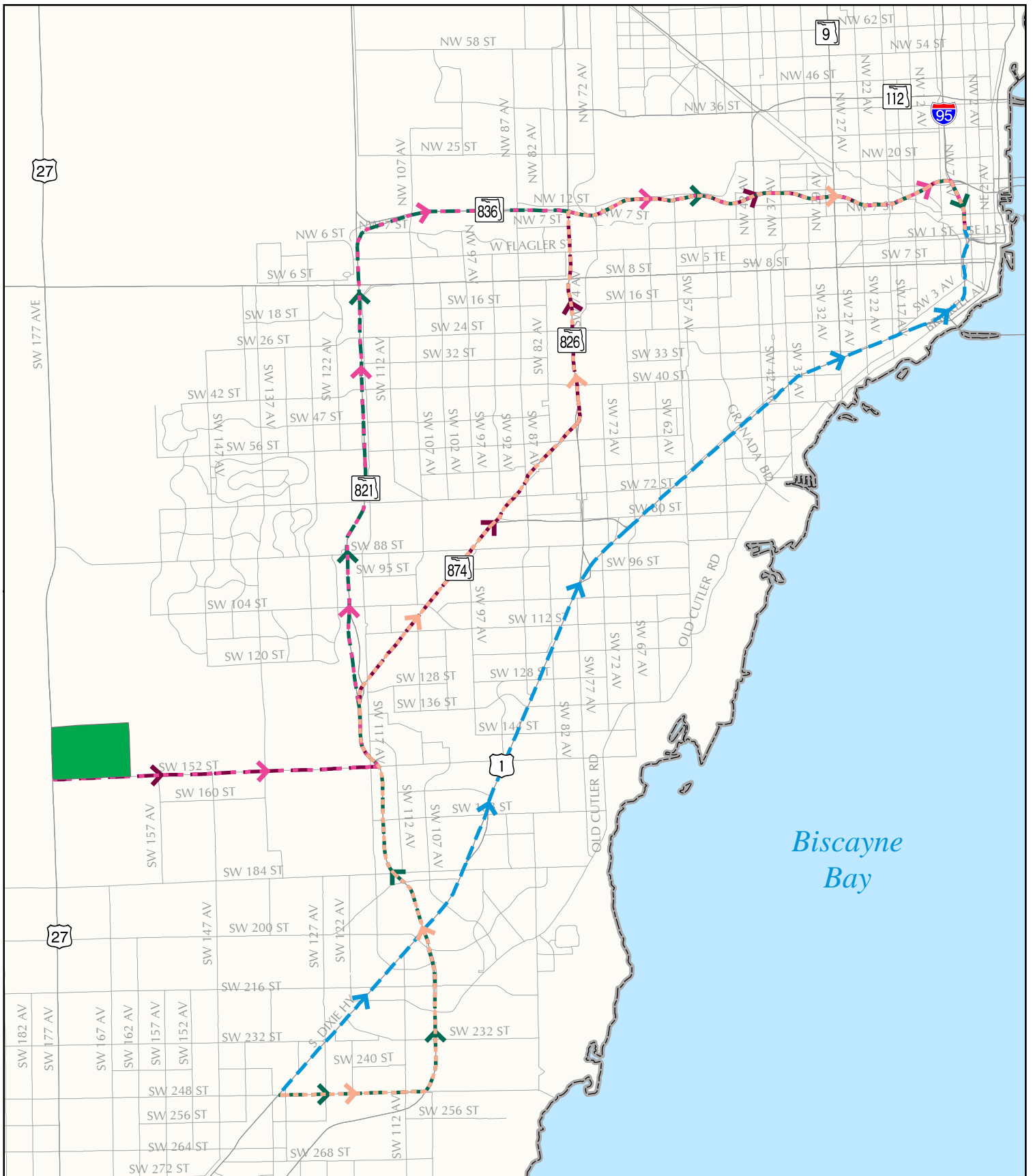


EXHIBIT II-3 (b)
Automobile Survey Routes - Coral Gables

PARKLAND



LEGEND

- | From Parkland | From Princeton CUC |
|---------------|--------------------|
| Route 10 | Route 12 |
| Route 11 | Route 13 |
| | Route 14 |



Source: Miami-Dade GIS 2007; Adapted by The Curtis Group, 2008
 0 1 2 4 Miles

EXHIBIT II-3 (c)
 Automobile Survey Routes - Downtown Miami
 PARKLAND

As evidenced in **Table II-3**, the comparative automobile travel times from Parkland and the Princeton CUC to the three employment destinations do not vary significantly; however, they are in all cases shorter from Parkland than from the Princeton CUC. Further, it should also be noted that those travel times recorded from Parkland to the three employment destinations are based on the configuration of the current roadway system. As a result of publicly-funded roadway improvements already enumerated in the County's Capital Improvement Element, in the MPO Adopted Transportation Improvement Program (*TIP 2009*), in addition to the improvements that Parkland proposes to fund, travel times in the future (starting in the Year) are likely to be improved (i.e. reduced).

The programmed (i.e. funded) roadway improvements from *TIP 2009* that are most beneficial to improving automobile travel times to and from the Kendall area are outlined in **Table II-4** below.

Roadway Improvement Location	Type of Improvement	TIP 2009 Funding Status
SR 821/HEFT – SW 88 Street to SR 836	Widen HEFT to 10 lanes	Preliminary Engineering Funded 2007-2008
SR 821/HEFT – S. of SW 88 St to S. of SW 117 Ave	Widen HEFT to 12 lanes	Construction Funded 2009-2010
SR 821/HEFT – SW 117 Avenue to Eureka Drive	Widen HEFT to 12 lanes	Preliminary Engineering Funded 2008-2009
SR 821/HEFT – Eureka Drive to SW 216 Street	Widen HEFT to 8 lanes	Preliminary Engineering Funded 2007-2008
SW 177 Avenue – MP 10.984 to US 27	Widen from 2 to 4 lanes	Construction Funded 2008-2010
SW 177 Avenue – North of SW 8 Street to MP 2.754	Widen from 2 to 4 lanes	Construction Funded 2008-2010
SW 177 Avenue – SW 88 Street to SW 8 Street	Widen from 2 to 4 lanes	ROW 2008-2009, Construction 2012-2013
SW 177 Avenue – SW 136 Street to SW 88 Street	Widen from 2 to 4 lanes	Preliminary Engineering Funded 2010-2011
SW 177 Avenue – SW 296 Street to SW 136 Street	Widen from 2 to 4 lanes	Preliminary Engineering and ROW 2011-2013
SW 157 Avenue – SW 112 Street to SW 136 Street	New 4 lane roadway	Construction Funded 2008-2010
SW 157 Avenue – SW 152 Street to SW 184 Street	Widen from 2 to 4 lanes	Construction Funded 2009-2011
SW 137 Avenue – SW 200 Street to US-1	New 2 lane roadway	Construction Funded 2010-2013
SW 137 Avenue – US-1 to HEFT	Widen from 2 to 4 lanes	Construction Funded 2009-2012
SW 127 Avenue – SW 88 Street to SW 120 Street	Widen from 2 to 4 lanes	Construction Funded 2008-2009
SW 117 Avenue – SW 152 Street to SW 184 Street	Widen from 2 to 4 lanes	Construction nearing completion by County
SW 88 Street – SW 167 Avenue to SW 162 Avenue	Widen from 4 to 6 lanes	Construction funded by Kendall Commons
SW 88 Street – SW 162 Avenue to SW 150 Avenue	Widen from 4 to 6 lanes	Construction funded by Kendall Town Centre
SW 120 Street – SW 137 Avenue to SW 117 Avenue	Widen from 4 to 6 Lanes	Construction Funded 2011-2013
SW 136 Street – SW 149 Avenue to NW 139 Court	Widen from 2 to 4 lanes	Construction Funded 2008-2009
SW 136 Street – SW 127 Avenue to HEFT	Widen from 2 to 4 lanes	Construction Funded 2011-2013
SW 184 Street – SW 147 Avenue to SW 137 Avenue	Widen from 2 to 4 lanes	Construction Funded 2008-2013
SW 184 Street – SW 137 Avenue to SW 127 Avenue	Widen from 2 to 4 lanes	Construction nearing completion by County

Several additional roadway improvements will be funded by Parkland. These proposed improvements are outlined in **Table II-5** below. Each will improve both capacity and accessibility while providing mobility benefits to the Kendall area.

Roadway Improvement Location	Type of Improvement
SW 152 St – SW 177 Ave to SW 162 Ave	Build a new 6 lane divided roadway
SW 152 St – SW 162 Ave to SW 157 Ave	Widen from 2 lanes to 6 lanes
SW 152 St – SW 157 Ave to SW 147 Ave	Widen from a 2LU to a 5LD, with 3 EB lanes and 2 WB lanes [1]
SW 152 St – SW 147 Ave to SW 137 Ave	Widen from a 4LD to a 5LD, with 3 EB lanes and 2 WB lanes [1]
SW 152 St – SW 117 Ave to HEFT	Restripe/Widen from a 4LD to a 6LD as part of TIP No. TP4060961
SW 136 St – SW 177 Ave to SW 162 Ave	Build a new 4 lane divided roadway
SW 136 St – SW 162 Ave to SW 157 Ave	Build a new 4 lane divided roadway
SW 136 St – SW 157 Ave to SW 137 Ave	Widen from a 4LD to a 5LD, with 3 WB lanes if ROW is provided [2]
SW 117 Ave – HEFT to SW 152 St	SB Free Flow Right Turn Lane and/or NB left turn lane as part of TIP No. TP4060961
SW 184 St – SW 157 Ave to SW 147 Ave	Widen from 2 lanes to a 4LD
SW 177 Ave – SW 136 St to SW 152 St	Dedicate additional ROW for the 4LD FIHS Cross Section
SW 177 Ave – SW 136 St to SW 152 St	Build the 4LD FIHS Cross Section
SW 172 Ave – SW 136 St to CSX	New 4 lane divided roadway
SW 172 Ave – CSX to SW 152 St	New 4 lane divided roadway
SW 167 Ave – SW 136 St to SW 152 St	New 4 lane divided roadway
SW 162 Ave – SW 136 St to SW 144 St	New 4 lane divided roadway
SW 162 Ave – SW 144 St to SW 152 St	Widen from 2 lanes to a 4LD
SW 144 St – SW 177 Ave to SW 162 Ave	New 4 lane divided roadway

III. PREMIUM TRANSIT AND THE CORAL REEF MAX

The materials below are provided to respond to questions raised by the Department of Planning and Zoning regarding the classification of the transit service abutting the east edge of Parkland.

A. Coral Reef Max – Metrobus Route 252

The June 2008 Miami Dade Transit System Map identifies the location of the Coral Reef Max - Metrobus Route 252 which extends from the Dadeland South Metrorail Station, along US-1 to S.W. 152 Street, and along S.W. 152 Street connecting to S.W. 162 Avenue. Metrobus Route 252 is labeled “Coral Reef Max” as far west as the Country Walk Loop at S.W. 152 Avenue as depicted on the June 2008 Miami Dade Transit System Map (see attached **Exhibit III-1**). The Country Walk Loop at S.W. 152 Avenue is located one mile from the route’s current terminus at S.W. 162 Avenue.

1. Country Walk Loop

West of S.W. 137 Avenue, the Coral Reef Max departs S.W. 152 Street and circulates through Country Walk extending north on S.W. 137 Avenue, west on Country Walk Drive, south on S.W. 152 Avenue, east on S.W. 160 Street and north on S.W. 137 Avenue back to S.W. 152 Street (as illustrated on attached **Exhibit III-2**). Weekday AM and PM peak hour service headways are maintained at 20 minutes (or less) from 5:38 AM to 8:23 AM and from 4:45 PM to 7:20 PM as indicated on **Table III-1** below. Service frequency information has been obtained from Miami-Dade Transit reflecting the latest route schedule adjustments dated June 2008.

2. Service to S.W. 162 Avenue

During selected weekday rush hour trips (in the AM and PM peak hours), the Coral Reef Max – Metrobus Route 252 extends west from Country Walk along S.W. 152 Street to the residential neighborhood located north of S.W. 152 Street and west of S.W. 157 Avenue. Service extends north on S.W. 160 Avenue, west on S.W. 144 Street, south on S.W. 162 Avenue and east on S.W. 152 Street (as illustrated on attached **Exhibit III-2**). Weekday AM and PM peak hour service headways are maintained at 20 minutes (or less) from 6:41 AM to 7:20 AM and from 5:10 PM to 6:30 PM as indicated in **Table III-1** below. This weekday rush hour service provided at a service frequency equal to 20 minutes or less extends to the eastern edge of Parkland during the peak hour period. Service frequency information has been obtained from Miami-Dade Transit reflecting the latest route schedule adjustments dated June 2008.

Table III-1 Coral Reef Max – Metrobus Route 252 – Existing Service Frequency		
Coral Reef Max - Metrobus Route 252	Weekday AM Peak	Weekday PM Peak
Dadeland South Metrorail Station	20 min – 7:15AM to 10:10AM	20 min – 3:00PM to 7:10PM
SW 152 St/117 Ave/Tpke Park & Ride Lot	20 min – 5:50AM to 8:42AM	20 min – 4:27PM to 7:07PM
Deerwood - SW 140 Ter at SW 119 Ave	20 min – 7:18AM to 8:18AM	20 min – 3:38PM to 6:17PM
Metrozoo	No Early AM Service	20 min – 3:33PM to 5:32PM
Country Walk – SW 152 St at SW 152 Ave	20 min – 5:38AM to 8:23AM	20 min – 4:45PM to 7:20PM
SW 152 St at SW 162 Ave	20 min – 6:41AM to 7:20AM	20 min – 5:10PM to 6:30PM

Source: Miami-Dade Transit Metrobus Route 252 - Coral Reef Max Service Map and Service Schedule, June 2008.

B. Consistency with Land Use Policy LU-8G

Pursuant to Land Use Policy LU-8G iii):

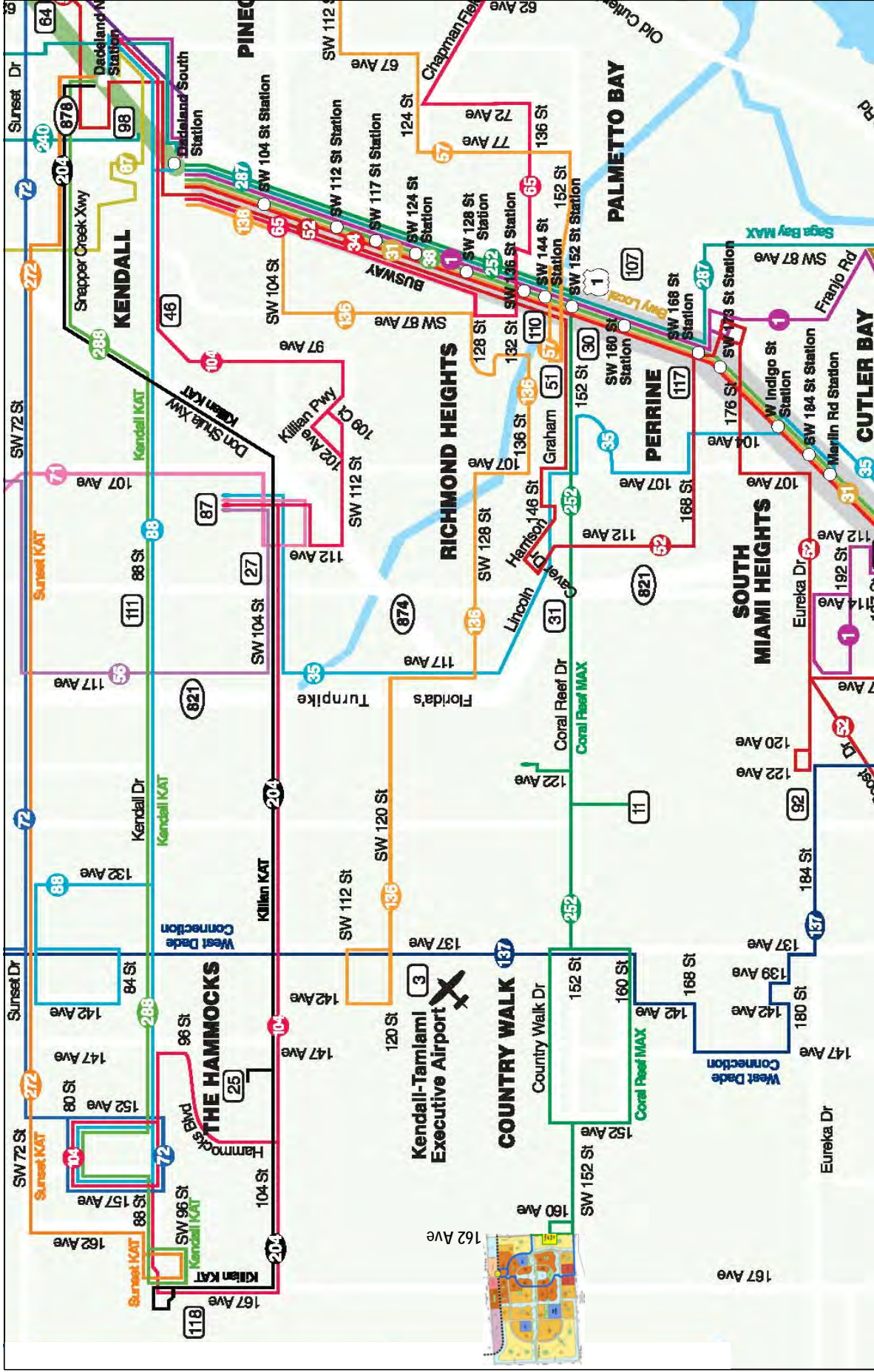
“The following areas shall be given priority for inclusion, subject to conformance with Policy LU-8F and the foregoing provision of this policy:

- c) Locations within one mile of a planned urban center or extraordinary transit service;”

As indicated above, Metrobus Route 252 is labeled “Coral Reef Max” as far west as the Country Walk Loop at S.W. 152 Avenue as depicted on the June 2008 *Miami Dade Transit System Map* (see attached **Exhibit III-1**). The Country Walk Loop at S.W. 152 Avenue is located one mile from the route’s terminus at S.W. 162 Avenue. The Coral Reef Max express bus that originates from the Dadeland South Metrorail Station is the same vehicle that extends west on S.W. 152 Street to Country Walk, and is the same vehicle that extends west to reach S.W. 162 Avenue during the scheduled AM and PM rush hour service. Transit service is provided during the selected AM and PM peak hours at a headway of 20 minutes or less.

Page II-11 of the Transportation Element of the Miami-Dade County CDMP defines the term “Extraordinary Transit Service” as “Commuter Rail” or “Express Bus”. This definition is provided in a table on page II-11 that represents a summary of the Miami-Dade County Traffic Circulation Level of Service Standards. In order to evaluate consistency with Land Use Policy LU-8G iii) c), the location of Parkland (with its eastern edge abutting S.W. 162 Avenue) is found to be located within one mile of the transit service provided to Country Walk by the Coral Reef Max – Metrobus Route 252 (at a service headway during the AM and PM peak hours of 20 minutes or less), meeting the definition of extraordinary transit service.

Transit Connections to Parkland



Parkland

Coral Reef Max – Route 252

Location of the Coral Reef Max - Route 252

August 2008

Exhibit III-1

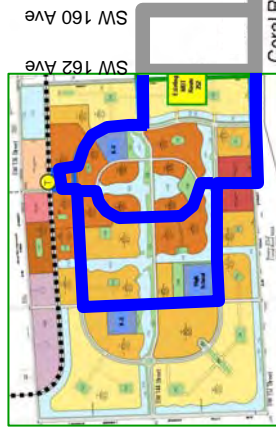
Potential Transit Connections to Parkland

Route 252 Coral Reef MAX

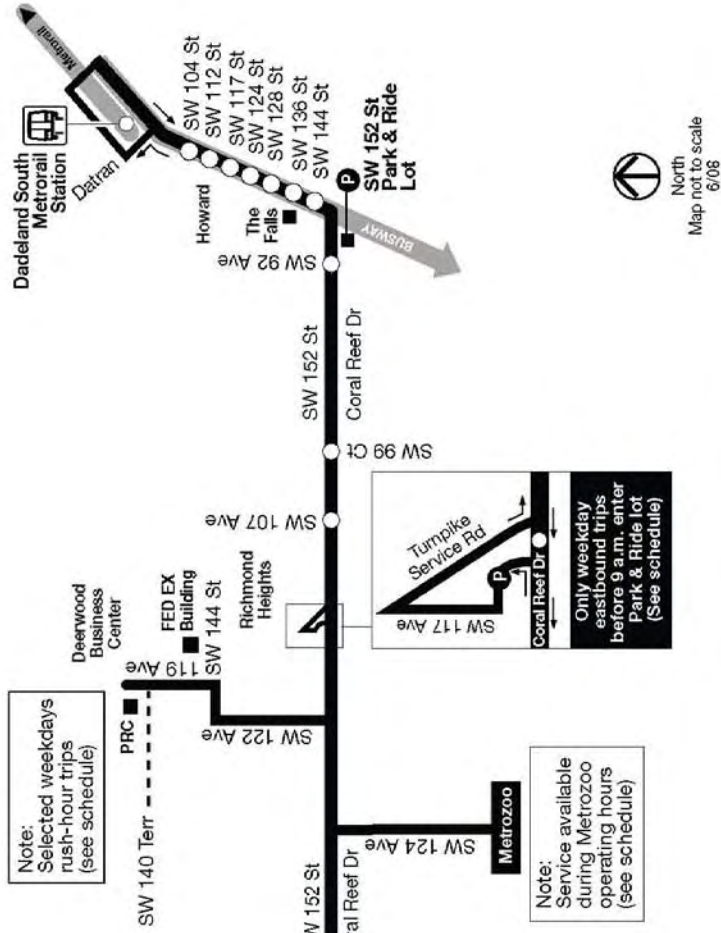


MAX Stops
(Limited-stop service east of SW 107 Ave.)

P Park & Ride Lot



Selected weekday rush-hour trips (see schedule) and all day Saturday and Sunday.



Potential Route Extension

C. Local Transit Service to Parkland

Exhibit III-3 illustrates how the Coral Reef Max - Metrobus Route 252 can be extended (in the future) into Parkland to service this emerging community. Residential units and employment centers are not anticipated for occupancy before the Year 2014. Parkland has committed to work with Miami Dade Transit to develop route extensions to serve the community that will fit seamlessly into the transit patterns that have been used successfully to provide transit access along section line and half section line roadways. **Exhibit III-3** demonstrates how transit service can be provided to connect Parkland's residential areas, schools, employment and shopping, with ingress into the community using S.W. 144 Street and egress from the community using S.W. 152 Street, consistent with the current travel pattern for the Coral Reef Max – Metrobus Route 252.

D. Regional Transit Service to Kendall

Parkland is located in the study area for two MPO premium transit corridor studies: the South Link Alternatives Analysis (completed in 2006) and the Kendall Link Alternatives Analysis (still underway). These transit corridor studies demonstrate how the Kendall Area can be more directly connected by premium transit service providing extensive transit access county-wide. The attached **Exhibit III-4** illustrates five premium transit corridors that have been studied by the MPO to bring improved premium transit service to the Kendall Area. These include the Busway/South Dade Corridor, the Kendall Corridor, the HEFT Corridor, the S.W. 137 Avenue Corridor and the CSX Tri-Rail Corridor.

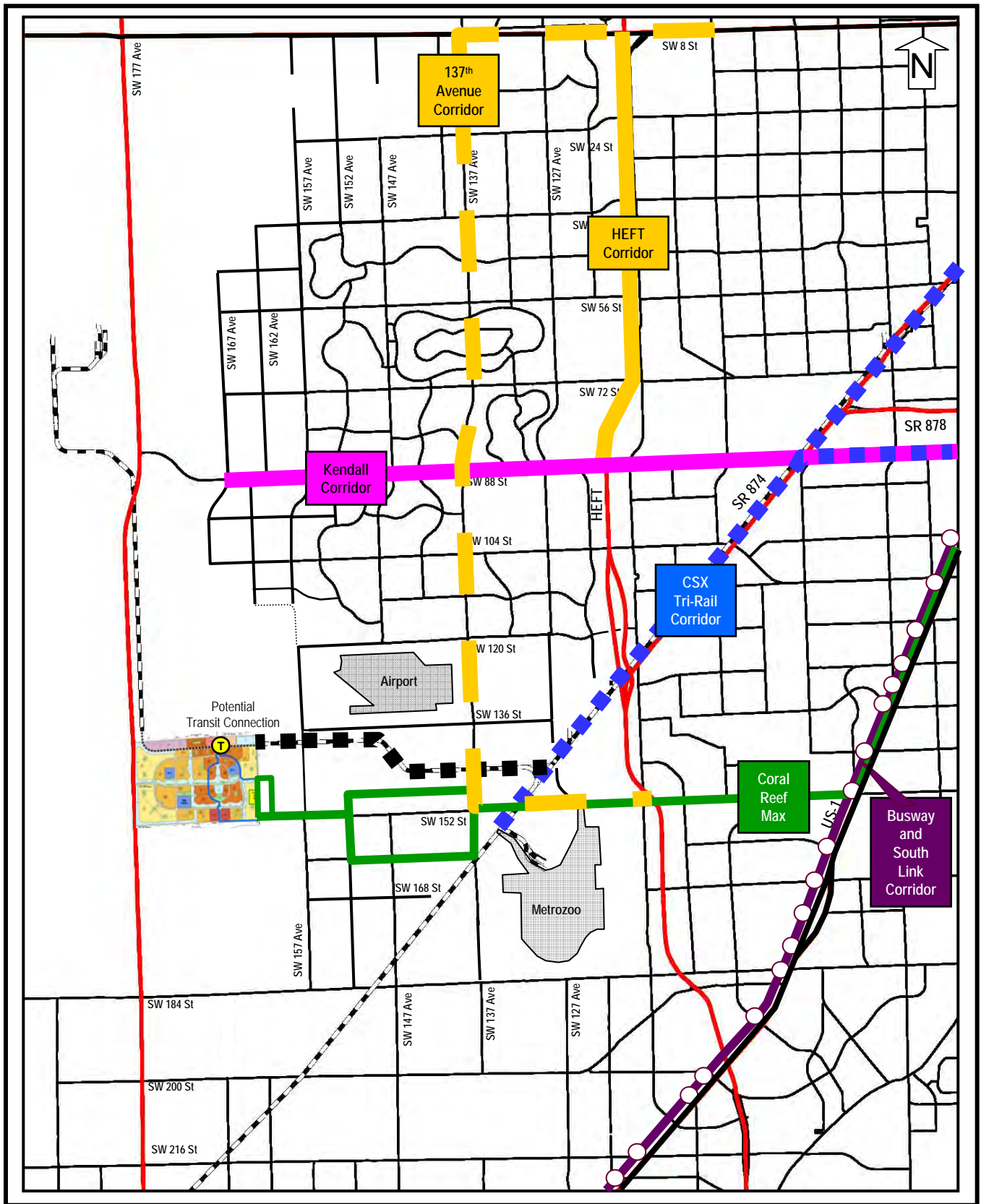
Parkland is situated adjacent to one of the western spurs of the CSX rail corridor. Portions of the CSX rail corridor are still being studied by the MPO for the potential to provide commuter Tri-Rail service to the Kendall Area. The Master Plan for Parkland has incorporated a transit station adjacent to the project's employment center in the event that future transit service along the CSX becomes a reality.

E. No Transit Capture

Please note that to provide a conservative transportation analysis for Parkland, no transit capture (i.e. reduction in external vehicular trips) has been proposed based upon the use of Miami-Dade Transit bus service or the use of a commuter rail transit system.

Potential Transit Connections to Parkland



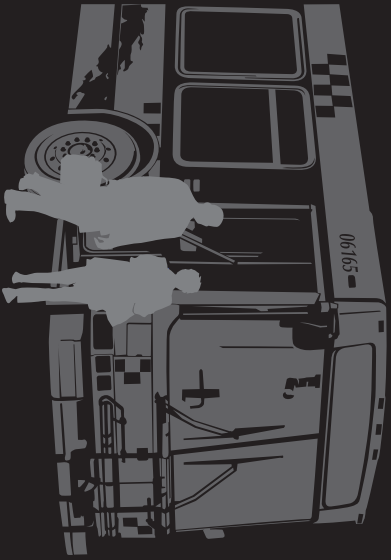


Legend



- Existing Rail Lines
- FIHS Roadways
- Parkland
- Existing Busway and South Link Corridor
- Coral Reef Max/Bus Route 252
- Kendall Transit Corridor under study by MPO
- HEFT & 137 Ave Transit Corridors under study by MPO
- CSX Tri-Rail Corridor under study by MPO

Exhibit III-4
Regional Transit Corridors
August 2008



Country Walk

Metrozoo

Deerwood Business Center (Weekday Service Only)

SW 117 St/Park & Ride Lot

SW 152 St/Park & Ride Lot

MetroRail Station

Dadeland South

Metrolink

MIAMI-DADE TRANSIT

METROBUS ROUTE 252

CORAL REEF MAX

CARLOS ALVAREZ
MAYOR

BOARD OF COUNTY COMMISSIONERS

BRUNO A. BARBERO

CHAIRMAN

BARBARA J. JORDAN

VICE CHAIRWOMAN

BARBARA J. JORDAN

DISTRICT 1

DOORNI D. ROLLE

DISTRICT 2

AUDREY M. EMMISON

DISTRICT 3

SALYA HERMAN

DISTRICT 4

BRUNO A. BARBERO

DISTRICT 5

REBEKA SOSA

DISTRICT 6

CARLOS A. GIMENEZ

DISTRICT 7

KATY SOBENSON

DISTRICT 8

DENNIS C. ANSS

DISTRICT 9

SEN JAVIER D. SOUTO

DISTRICT 10

JOE A. MARTINEZ

DISTRICT 11

JOSE "PEPE" DIAZ

DISTRICT 12

MATACHA SELIAS

DISTRICT 13

HARVEY HUDIN

CLERK OF COURTS

GERGIE M. BURGESS

COUNTY MANAGER

ROBERT A. CHIENS, JR.

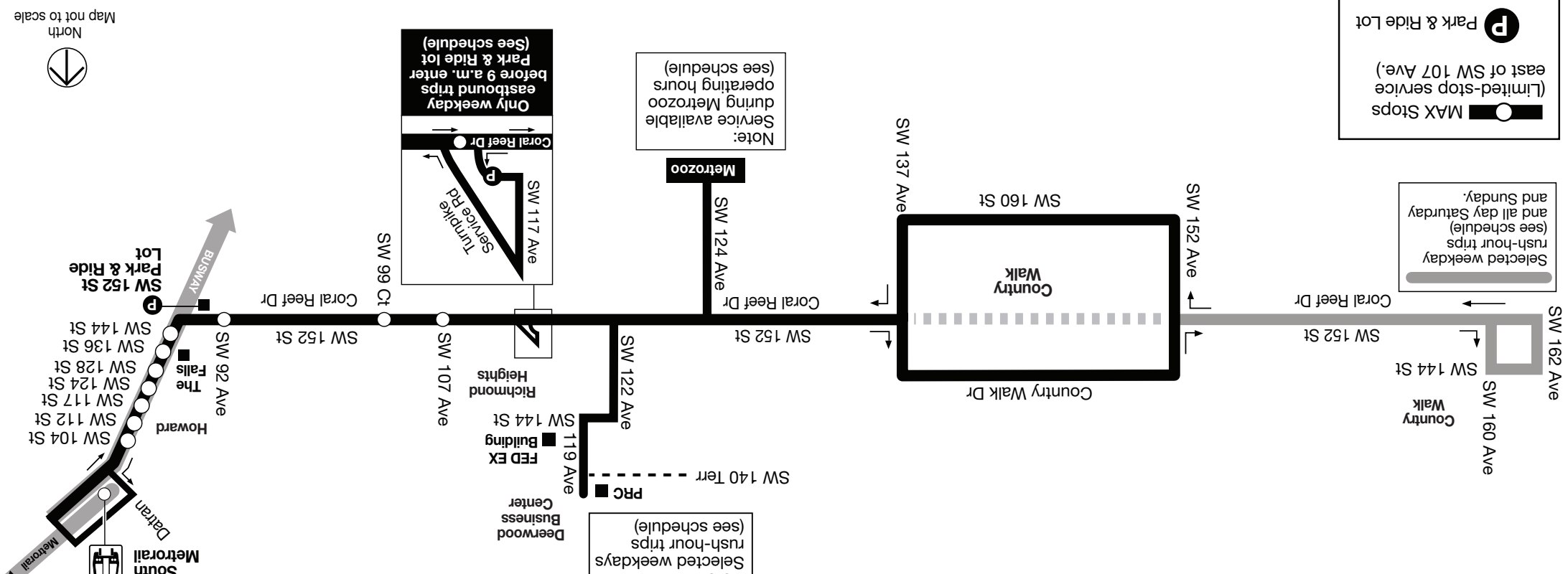
COUNTY ATTORNEY

HARPL S. LAFOR

MDI DIRECTION

Coral Reef MAX

Route 252



MAX Stops (Limited-stop service east of SW 107 Ave.)

Selected weekdays rush-hour trips (see schedule) and all day Saturday and Sunday.

Note: Selected weekdays rush-hour trips (see schedule)

Note: Service available during Metrozoo operating hours (see schedule)



FARES

Fare	Reduced Fare
Bus or Rail \$1.50*	.75c
Express Bus \$1.85**	.90c
(An express route serves fewer stops than a regular route, and part of the route may run on an expressway.)	
Shuttle Bus 25c	.10c
(A shuttle bus/circulator offers limited-stop service within a neighborhood, providing better connection to major bus routes.)	
Mover Free	Free

TRANSFERS

To ride bus and rail (or more than one bus) to reach your destination, you need a transfer ticket. MetroPass, Discount MetroPass, Golden Passport and Patriot Passport users do not need a transfer. A bus-to-bus transfer is valid for two hours on a one-way trip. Use transfers only where bus routes intersect or link to MetroRail.

Fare	Reduced Fare
Bus-to-Bus, Bus-to-Rail, or Rail-to-Bus 50c	.25c
Bus or Rail-to-Express Bus 50c + 35c	.25c + 15c
fare upgrade fare upgrade	
Mover-to-Bus or Rail . . . \$1.50*	.75c
Bus or Rail-to-Mover . . . Free	Free

*or one token **one token plus 35c

Passengers in wheelchairs no longer have to display a pass or identification when boarding Metrobus and MetroRail. MetroRail parking: \$4 daily, including weekends and holidays.

KAT TRANSIT

Metropass \$75.00	
Metropass Rabè \$37.50	
Pèmi paking mansyèl MetroRail \$6.25	
(Moun ki gen MetroPass, MetroPass Rabè, Paspò Dore ak Paspò Patriyòt ka achte yon pèmi paking MetroRail li li nesesè.)	
Miami-Dade Transit (MDT) ofri rabè a kliyan ki kaifye yo. Sèman rele Sèvis Kliyantèl, oswa ale sou sit entènèt MDT a nan www.miamidade.gov/transit pou jwenn plis enfòmasyon ak pou detèmine elijiblite.	

KONTAKTE NOU

Sèvis Kliyantèl/ Planifikasyon Vwayaj 305-770-3131
 Gratis Osid de SW 216th Street 305-891-3131
 Moun ki sèvi ak TTY yo (soud, fande dj) 305-499-8971
 Sit entènèt www.miamidade.gov/transit
 Sèvis Transpòtasyon go.miamidade.gov

PASSES & PERMITS

Metropass \$75.00	
Discount MetroPass \$37.50	
MetroRail monthly parking permit \$6.25	
(MetroPass, Discount MetroPass, Golden Passport and Patriot Passport users can purchase a MetroRail parking permit when needed.)	
Miami-Dade Transit offers discounted fares. Call Customer Services, or log on to www.miamidade.gov/transit to see if you qualify.	

CONTACT US

Customer Services/ Trip Planning . . . 305-770-3131
 Toll-free south of SW 216th St. 305-891-3131
 TTY Users (deaf or with hearing impairments). . . 305-499-8971
 Website www.miamidade.gov/transit

FRÈ YO

Frè Redwi	Frè Redwi
Bis oswa Tren \$1.50*	.75c
Bis Ekspres \$1.85**	.90c
(Yon bis ekspres kanpe nan mwens estasyon ke yon bis regilye, epi li ka fè sou yon wout ekspreswè pou omwen yon pati nan trajè a.)	
Bis "Shuttle" 25c	.10c
(Yon bis "shuttle"/"circulator" ofri sèvis ekspres nan yon katye, pou fè koneksyon ak de gwo wout kote bis pase.)	
"Mover" Gratis Gratis	

TRANSFÈ YO

Pou pran bis oswa tren (oswa plis ke yon bis) pou rive nan destinasyon w nan, w bezwen yon transfè. Moun ki gen MetroPass, MetroPass Rabè, Paspò Dore ak Paspò Patriyòt pa bezwen transfè. Yon transfè de bis-a-bis valid pou dezèdan nan yon wwayaj yon grenn direksyon. Sèvi ak transfè yo sèman kote wout bis yo kwaze oswa kote gen yon lyen ak MetroRail.

COMUNIQUESE CON NOSOTROS

Información/ planificación de viajes 305-770-3131
 Usuarios que viven al sur de la Calle 216 del suroeste 305-891-3131
 Personas sordas o con dificultades auditivas (TTY) 305-499-8971
 Sitio cibernético www.miamidade.gov/transit

TARIFAS

Tarifa Reducida	Tarifa
Autobús o tren \$1.50*	.75c
Autobús expreso . . . \$1.85**	.90c
(El servicio expreso de autobús hace menos paradas que una ruta regular, y parte de su recorrido puede ser en una autopista.)	
Autobús "shuttle" . . . 25c	.10c
(El servicio "shuttle" de autobús hace paradas limitadas en ciertos vecindarios y ofrece conexiones con rutas principales.)	
Metromover Gratis	Gratis

TRANSFERENCIAS

Para viajar en autobús y tren (o en más de un autobús) necesita una transferencia. Los clientes viajando con el MetroPass, el MetroPass con Descuento, el Pasaporte Dorado o el Pasaporte Patriota no necesitan transferencias. Las transferencias entre autobuses son válidas por dos horas en una sola dirección de viaje. Use las transferencias solamente donde las rutas se cruzan entre sí o cuando se conectan al MetroRail.

Tarifa Reducida

De un autobús a otro, de un autobús a un tren o de un tren a un autobús 50c	.25c
De un autobús o un tren a un autobús expreso 50c + 35c	.25c + 15c
aumento de tarifa aumento de tarifa	
Del Metrolover a un autobús o un tren \$1.50*	.75c
De un autobús o un tren al Metrolover Gratis	Gratis

*una ficha del transporte más 35c

Weekday – Eastbound / Días de Semana – Rumbo Este / Lacemèn – Direksyon Is

SW 152 St & 162 Ave	SW 152 St & 152 Ave	SW 152 St & 137 Ave	Metrozoo	SW 140 Terr & 119 Ave	SW 152 St & Turnpike Park & Ride	SW 152 St & 117 Ave	SW 136 St & Busway Station	Dadeland South Station
05:36AM	05:38AM	05:45AM	:	:	05:50AM	:	05:59AM	06:09AM
:	05:50AM	05:57AM	:	:	06:06AM	:	06:20AM	06:30AM
06:07AM	06:10AM	06:17AM	:	:	06:26AM	:	06:40AM	06:50AM
:	06:31AM	06:38AM	:	:	06:47AM	:	07:04AM	07:15AM
06:41AM	06:44AM	06:51AM	:	:	07:02AM	:	07:19AM	07:30AM
07:00AM	07:03AM	07:11AM	:	:	07:22AM	:	07:39AM	07:50AM
07:20AM	07:23AM	07:31AM	:	:	07:42AM	:	07:59AM	08:10AM
:	07:43AM	07:51AM	:	:	08:02AM	:	08:19AM	08:30AM
08:00AM	08:03AM	08:11AM	:	:	08:22AM	:	08:39AM	08:50AM
:	08:23AM	08:31AM	:	:	08:42AM	:	08:59AM	09:10AM
08:43AM	08:46AM	08:54AM	:	:	09:05AM	:	09:19AM	09:30AM
:	09:05AM	09:12AM	09:18AM	:	:	09:25AM	09:39AM	09:50AM
:	09:25AM	09:32AM	09:38AM	:	:	09:45AM	09:59AM	10:10AM
:	09:55AM	10:02AM	10:08AM	:	:	10:15AM	10:29AM	10:40AM
:	10:25AM	10:32AM	10:38AM	:	:	10:45AM	10:59AM	11:10AM
:	10:55AM	11:02AM	11:08AM	:	:	11:15AM	11:29AM	11:40AM
:	11:25AM	11:32AM	11:38AM	:	:	11:45AM	11:59AM	12:10PM
:	11:55AM	12:02PM	12:08PM	:	:	12:15PM	12:29PM	12:40PM
:	12:25PM	12:32PM	12:38PM	:	:	12:45PM	12:59PM	01:10PM
:	12:55PM	01:02PM	01:08PM	:	:	01:15PM	01:29PM	01:40PM
:	01:25PM	01:32PM	01:38PM	:	:	01:45PM	01:59PM	02:10PM
:	01:55PM	02:02PM	02:08PM	:	:	02:15PM	02:29PM	02:40PM
:	02:25PM	02:32PM	02:38PM	:	:	02:45PM	02:59PM	03:10PM
:	02:55PM	03:02PM	03:08PM	:	:	03:15PM	03:29PM	03:40PM
:	03:20PM	03:27PM	03:33PM	03:38PM	:	03:45PM	03:59PM	04:10PM
:	03:39PM	03:46PM	03:52PM	03:57PM	:	04:04PM	04:19PM	04:30PM
:	03:57PM	04:05PM	04:12PM	04:17PM	:	04:24PM	04:39PM	04:50PM
:	04:17PM	04:25PM	04:32PM	04:37PM	:	04:44PM	04:59PM	05:10PM
04:34PM	04:37PM	04:45PM	04:52PM	04:57PM	:	05:04PM	05:19PM	05:30PM
:	04:57PM	05:05PM	05:12PM	05:17PM	:	05:24PM	05:39PM	05:50PM
05:14PM	05:17PM	05:25PM	05:32PM	05:37PM	:	05:44PM	05:59PM	06:10PM
05:39PM	05:42PM	05:50PM	:	05:57PM	:	06:04PM	06:19PM	06:30PM
05:59PM	06:02PM	06:10PM	:	06:17PM	:	06:24PM	06:39PM	06:50PM
06:21PM	06:24PM	06:32PM	:	06:39PM	:	06:46PM	07:01PM	07:10PM
:	06:45PM	06:53PM	:	:	:	:	:	:
06:46PM	06:49PM	06:57PM	:	07:04PM	:	07:09PM	07:21PM	07:30PM
07:15PM	07:17PM	07:24PM	:	:	:	07:29PM	07:41PM	07:50PM
07:24PM	07:26PM	07:33PM	:	:	:	:	:	:
:	07:50PM	07:57PM	:	:	:	08:02PM	08:14PM	08:23PM
:	08:13PM	08:20PM	:	:	:	:	:	:
:	09:03PM	09:10PM	:	:	:	:	:	:

Weekday – Westbound / Días de Semana – Rumbo Oeste / Lacemèn – Direksyon Wès

Dadeland South Station	SW 136 St & Busway Station	SW 152 St & 117 Ave	SW 140 Terr & 119 Ave	Metrozoo	SW 152 St & 137 Ave	SW 152 St & 152 Ave	SW 152 St & 162 Ave
:	:	:	:	:	05:26AM	05:32AM	05:36AM
:	:	:	:	:	05:44AM	05:50AM	:
:	:	:	:	:	05:56AM	06:03AM	06:07AM
05:54AM	06:04AM	06:15AM	06:20AM	:	06:25AM	06:31AM	:
:	:	:	:	:	06:30AM	06:37AM	06:41AM
06:19AM	06:29AM	06:40AM	06:45AM	:	06:50AM	06:56AM	07:00AM
06:29AM	06:39AM	06:50AM	06:55AM	07:02AM	07:09AM	07:16AM	07:20AM
06:50AM	07:01AM	07:13AM	07:18AM	:	07:23AM	07:30AM	:
07:10AM	07:21AM	07:33AM	07:38AM	:	07:43AM	07:50AM	07:54AM
07:30AM	07:41AM	07:53AM	07:58AM	:	08:03AM	08:10AM	:
07:50AM	08:01AM	08:13AM	08:18AM	:	08:23AM	08:30AM	08:34AM
08:15AM	08:26AM	08:38AM	08:43AM	:	08:48AM	08:55AM	:
08:40AM	08:51AM	09:05AM	09:11AM	:	09:18AM	09:25AM	:
09:06AM	09:17AM	09:31AM	:	09:36AM	09:43AM	09:50AM	:
09:36AM	09:47AM	10:01AM	11:10AM	10:06AM	10:13AM	10:20AM	:
10:06AM	10:17AM	10:31AM	11:06AM	10:36AM	10:43AM	10:50AM	:
10:36AM	10:47AM	11:01AM	11:36AM	11:06AM	11:13AM	11:20AM	:
11:06AM	11:17AM	11:31AM	12:06PM	11:36AM	11:43AM	11:50AM	:
11:36AM	11:47AM	12:01PM	12:36PM	12:06PM	12:13PM	12:20PM	:
12:06PM	12:17PM	12:31PM	12:36PM	12:36PM	12:43PM	12:50PM	:
12:36PM	12:47PM	01:01PM	01:06PM	01:06PM	01:13PM	01:20PM	:
01:06PM	01:17PM	01:31PM	01:36PM	01:36PM	01:43PM	01:50PM	:
01:36PM	01:47PM	02:01PM	02:06PM	02:06PM	02:13PM	02:20PM	:
02:06PM	02:17PM	02:31PM	02:36PM	02:36PM	02:43PM	02:50PM	:
02:36PM	02:47PM	03:01PM	03:06PM	03:06PM	03:13PM	03:20PM	:
:	:	:	:	:	03:32PM	03:39PM	:
03:00PM	03:11PM	03:25PM	03:30PM	03:30PM	03:37PM	03:44PM	:
03:20PM	03:31PM	03:45PM	03:50PM	03:50PM	03:57PM	04:06PM	:
03:40PM	03:51PM	04:06PM	04:11PM	04:11PM	04:18PM	04:27PM	04:32PM
04:00PM	04:12PM	04:27PM	:	04:36PM	04:45PM	:	:
04:20PM	04:32PM	04:47PM	:	04:56PM	05:05PM	05:10PM	:
04:40PM	04:52PM	05:07PM	:	05:16PM	05:25PM	05:30PM	:
05:00PM	05:12PM	05:27PM	:	05:36PM	05:45PM	05:50PM	:
05:20PM	05:32PM	05:47PM	:	05:56PM	06:05PM	06:10PM	:
05:40PM	05:52PM	06:07PM	:	06:16PM	06:25PM	06:30PM	:
06:00PM	06:12PM	06:27PM	:	06:36PM	06:45PM	:	:
06:20PM	06:32PM	06:47PM	:	06:56PM	07:05PM	07:09PM	:
06:40PM	06:52PM	07:07PM	:	07:13PM	07:20PM	07:24PM	:
07:10PM	07:20PM	07:30PM	:	07:36PM	07:43PM	:	:
07:40PM	07:50PM	08:00PM	:	08:06PM	08:13PM	:	:
08:30PM	08:40PM	08:50PM	:	08:56PM	09:03PM	:	:

Saturday – Eastbound / Sábado – Rumbo Este / Samdi – Direksyon Is

SW 152 St & 162 Ave	SW 152 St & 152 Ave	SW 152 St & 137 Ave	Metrozoo	SW 152 St & 117 Ave	SW 136 St & Busway Station	Dadeland South Station
05:33AM	05:35AM	05:42AM	:	05:47AM	05:55AM	06:04AM
06:08AM	06:11AM	06:18AM	:	06:24AM	06:33AM	06:42AM
06:50AM	06:53AM	07:00AM	:	07:06AM	07:15AM	07:24AM
07:42AM	07:45AM	07:52AM	:	07:58AM	08:07AM	08:16AM
08:42AM	08:45AM	08:52AM	08:58AM	09:02AM	09:12AM	09:21AM
09:42AM	09:45AM	09:52AM	09:58AM	10:02AM	10:12AM	10:21AM
10:42AM	10:45AM	10:52AM	10:58AM	11:02AM	11:12AM	11:21AM
11:42AM	11:45AM	11:52AM	11:58AM	12:02PM	12:12PM	12:21PM
12:42PM	12:45PM	12:52PM	12:58PM	01:02PM	01:12PM	01:21PM
01:42PM	01:45PM	01:52PM	01:58PM	02:02PM	02:12PM	02:21PM
02:42PM	02:45PM	02:52PM	02:58PM	03:02PM	03:12PM	03:21PM
03:42PM	03:45PM	03:52PM	03:58PM	04:02PM	04:12PM	04:21PM
04:41PM	04:44PM	04:51PM	04:58PM	05:02PM	05:12PM	05:21PM
05:41PM	05:44PM	05:51PM	05:58PM	06:02PM	06:12PM	06:21PM
06:36PM	06:39PM	06:46PM	:	06:52PM	07:02PM	07:11PM
07:26PM	07:30PM	07:37PM	:	:	:	:

Saturday – Westbound / Sábado – Rumbo Oeste / Samdi – Direksyon Wès

Dadeland South Station	SW 136 St & Busway Station	SW 152 St & 117 Ave	Metrozoo	SW 152 St & 137 Ave	SW 152 St & 152 Ave	SW 152 St & 162 Ave
:	:	:	:	05:23AM	05:29AM	05:33AM
:	:	:	:	05:57AM	06:04AM	06:08AM
06:10AM	06:18AM	06:28AM	:	06:33AM	06:40AM	06:44AM
07:00AM	07:08AM	07:18AM	:	07:23AM	07:30AM	07:34AM
08:00AM	08:08AM	08:18AM	:	08:23AM	08:30AM	08:34AM
08:55AM	09:03AM	09:14AM	09:20AM	09:26AM	09:33AM	09:37AM
09:55AM	10:03AM	10:14AM	10:20AM	10:26AM	10:33AM	10:37AM
10:55AM	11:03AM	11:14AM	11:20AM	11:26AM	11:33AM	11:37AM
11:55AM	12:03PM	12:14PM	12:20PM	12:26PM	12:33PM	12:37PM
12:55PM	01:03PM	01:14PM	01:20PM	01:26PM	01:33PM	01:37PM
01:55PM	02:03PM	02:14PM	02:20PM	02:26PM	02:33PM	02:37PM
02:55PM	03:03PM	03:14PM	03:20PM	03:26PM	03:33PM	03:37PM
03:50PM	03:58PM	04:09PM	04:15PM	04:22PM	04:29PM	04:33PM
04:50PM	04:58PM	05:09PM	05:15PM	05:22PM	05:29PM	05:33PM
05:50PM	05:58PM	06:09PM	06:15PM	06:22PM	06:29PM	06:33PM
06:55PM	07:03PM	07:13PM	:	07:18PM	07:24PM	07:28PM

Sunday – Eastbound / Domingo – Rumbo Este / Dimanch – Direksyon Is

SW 152 St & 162 Ave	SW 152 St & 152 Ave	SW 152 St & 137 Ave	Metrozoo	SW 152 St & 117 Ave	SW 136 St & Busway Station	Dadeland South Station
05:33AM	05:35AM	05:42AM	:	05:47AM	05:55AM	06:04AM
06:08AM	06:11AM	06:18AM	:	06:24AM	06:33AM	06:42AM
06:50AM	06:53AM	07:00AM	:	07:06AM	07:15AM	07:24AM
07:42AM	07:45AM	07:52AM	:	07:58AM	08:07AM	08:16AM
08:42AM	08:45AM	08:52AM	08:58AM	09:02AM	09:12AM	09:21AM
09:42AM	09:45AM	09:52AM	09:58AM	10:02AM	10:12AM	10:21AM
10:42AM	10:45AM	10:52AM	10:58AM	11:02AM	11:12AM	11:21AM
11:42AM	11:45AM	11:52AM	11:58AM	12:02PM	12:12PM	12:21PM
12:42PM	12:45PM	12:52PM	12:58PM	01:02PM	01:12PM	01:21PM
01:42PM	01:45PM	01:52PM	01:58PM	02:02PM	02:12PM	02:21PM
02:42PM	02:45PM	02:52PM	02:58PM	03:02PM	03:12PM	03:21PM
03:42PM	03:45PM	03:52PM	03:58PM	04:02PM	04:12PM	04:21PM
04:41PM	04:44PM	04:51PM	04:58PM	05:02PM	05:12PM	05:21PM
05:41PM	05:44PM	05:51PM	05:58PM	06:02PM	06:12PM	06:21PM
06:36PM	06:39PM	06:46PM	:	06:52PM	07:02PM	07:11PM
07:26PM	07:30PM	07:37PM	:	:	:	:

Sunday – Westbound / Domingo – Rumbo Oeste / Dimanch – Direksyon Wès

Dadeland South Station	SW 136 St & Busway Station	SW 152 St & 117 Ave	Metrozoo	SW 152 St & 137 Ave	SW 152 St & 152 Ave	SW 152 St & 162 Ave
:	:	:	:	05:23AM	05:29AM	05:33AM
:	:	:	:	05:57AM	06:04AM	06:08AM
06:10AM	06:18AM	06:28AM	:	06:33AM	06:40AM	06:44AM
07:00AM	07:08AM	07:18AM	:	07:23AM	07:30AM	07:34AM
08:00AM	08:08AM	08:18AM	:	08:23AM	08:30AM	08:34AM
08:55AM	09:03AM	09:14AM	09:20AM	09:26AM	09:33AM	09:37AM
09:55AM	10:03AM	10:14AM	10:20AM	10:26AM	10:33AM	10:37AM
10:55AM	11:03AM	11:14AM	11:20AM	11:26AM	11:33AM	11:37AM

IV. AGRICULTURAL RETENTION

The materials below addresses the various provisions of the Miami-Dade County Comprehensive Development Master Plan (“CDMP”) and the Miami-Dade County Strategic Plan (the “Strategic Plan”) related to the retention of viable agricultural land in Miami-Dade County. It further addresses the consistency of the Parkland development program with these various provisions and goals.

The CDMP and the Strategic Plan both call for the retention of viable agricultural land outside the County’s Urban Development Boundary (“UDB”). Parkland proposes the extension of the UDB to encompass 960 acres of land that is currently farmed for row crops. While the approval of the Parkland development will result in the reduction of agricultural land, it will have no negative impact on the continued viability of the agricultural industry in Miami-Dade County. Parkland is therefore consistent with the CDMP and the Strategic Plan.

A. Consistency of Parkland with CDMP and Strategic Plan

CDMP Land Use Element Policy LU-1S requires the CDMP to be consistent with the Miami-Dade County Strategic Plan (the “Strategic Plan”). The Strategic Plan provides that a “priority key outcome” for the County is the protection of “viable agriculture and environmentally-sensitive lands.” (Strategic Plan at 19). A copy of the relevant page from the Strategic Plan is attached as **Exhibit IV-1**.

B. “No Net Loss” of Agricultural Land

In the past, the Department of Planning and Zoning has occasionally taken the position that the Strategic Plan, as incorporated into the CDMP through Policy LU-1S, requires that there be “no net loss” of agricultural lands outside the UDB. This position fails to take into account how the Strategic Plan is organized and is inconsistent with the Goals and Policies of the CDMP.

The Strategic Plan is intended to present County staff with a “game plan” to guide future decision-making. (Strategic Plan at 2). Along with general goals, referenced in the Strategic Plan as “key priority outcomes,” the Strategic Plan provides “measuring sticks” intended to help determine if the County is moving toward the stated goals. The “outcomes” cover a wide range of issues, from economic development, to public safety, to recreational opportunities offered County residents.

The “measuring sticks” are just as varied, but tend to focus on the percentage of the populace that believes that the County is making progress. For example, a key priority outcome of the Strategic Plan is “improved community design.” The measurement of success in reaching this outcome is the “[p]ercentage of survey respondents that rate the development and land use / zoning in their neighborhood as good or very good.” (Strategic Plan at 19).

The “priority key outcome” relevant to agricultural lands is the “[p]rotection of viable agriculture . . . lands.” (Strategic Plan at 19). The “no net loss” language appears only as a measurement of the County’s success in complying with the priority outcome of the Strategic Plan; “no net loss” is not a key outcome of the Strategic Plan. While the CDMP incorporates, through Policy LU-1S, the Strategic Plan’s goal of protecting viable agriculture lands, the “no net loss” concept

simply provides the County with a performance standard. It is not a “policy” or “goal” of either the Strategic Plan or the CDMP.

C. “No Net Loss” Inconsistent with CDMP

If we assume for the sake of argument that the Strategic Plan requires “no net loss” of agricultural land and the “no net loss” language has been incorporated as a Policy of the CDMP, the “no net loss” rule is inconsistent with many other Goals and Policies of the CDMP, as well as the accompanying text.

In the past, the Department of Planning and Zoning has relied on the “no net loss” language as a justification for the denial of applications to expand the UDB, stating that urban development of lands currently designated for agricultural use would be inconsistent with the “no net loss” goal. Under the only reasonable interpretation of the plain text, the “no net loss” language contemplates that no land currently designated for agricultural use outside the UDB be “lost” through urban development or use for non-agricultural purposes.

The “no net loss” concept is facially inconsistent with the following Policies and text of the CDMP:

- **Policy LU-1P** – Policy encourages non-agricultural commercial land uses in South Dade agricultural area outside the UDB.
- **Policy LU-2B** – Policy permits the development of governmental facilities such as fire and police stations in areas designated for Agricultural use under the CDMP.
- **Policy LU-8G** – Policy contemplates that UDB may be expanded under certain circumstances into areas now designated for Agricultural use, including Agriculturally-designated areas within Urban Expansion Areas, which are given priority for inclusion.
- **Policy LU-9L** – Policy requires adoption of zoning overlay for areas outside of the UDB to permit non-agricultural business uses in areas designated for Agricultural use.

D. Interpretative Text of the CDMP Land Use Plan Map

The interpretive text supporting the County’s Land Use Plan map provides that the following non-agricultural uses are permitted in areas designated for Agricultural use outside of the UDB:

- Residential uses
- Churches
- Non-agricultural businesses supportive of agriculture

It is clear that the CDMP contemplates and permits non-agricultural development in the Agricultural areas outside the UDB. The CDMP also contemplates that the UDB can, and should, be adjusted to provide adequate land for urban development. Those UDB movements will necessarily involve the reduction of land designated for Agriculture. The “no net loss” concept is therefore inconsistent with the Policies and text of the CDMP and should not be relied upon in reviewing any development application.



Neighborhood and Unincorporated Area Municipal Services

PRIORITY KEY OUTCOMES	HOW WE PLAN TO MEASURE OUR PERFORMANCE
Increased urban infill development and decreased urban sprawl	<ul style="list-style-type: none"> ■ Number of infill development and infill housing units and infill redevelopment projects per year (completed)
Protection of viable agriculture and environmentally-sensitive lands	<ul style="list-style-type: none"> ■ Percent of tree canopy increase ■ No net loss of agricultural designated lands outside the Urban Development Boundary (UDB) or environmentally sensitive lands
Improved community design	<ul style="list-style-type: none"> ■ Percentage of survey respondents that rate the development and land use/zoning in their neighborhood as good or very good
Strengthened bond between the community and Miami-Dade County government	<ul style="list-style-type: none"> ■ Percentage of residents satisfied with information delivery systems
Improved community access to information and services	
Well-trained, customer-friendly Miami-Dade County government workforce	<ul style="list-style-type: none"> ■ Percentage of survey respondents that agree Miami-Dade County employees that helped them went the extra mile to get their issue heard and resolved ■ Secret Shopper rating for employee customer service ■ Percentage of survey respondents that were satisfied with their last contact with Miami-Dade County personnel
Resident and business voluntary compliance with Miami-Dade County codes	<ul style="list-style-type: none"> ■ Percentage of residents and businesses aware of critical knowledge factors of code compliance
Timely identification and remediation of nuisances, including unsafe structures	<ul style="list-style-type: none"> ■ Percentage of general/nuisance complaints responded to within 48 hours ■ Percentage of nuisance incidents remediated within pre-defined timeframes
Neighborhood and rights-of-way aesthetics that foster and enhance quality of life	<ul style="list-style-type: none"> ■ Percentage of roadways and rights-of-way cleaned and well-maintained
Improved neighborhood roadways, sidewalks, drainage, and reduced flooding	<ul style="list-style-type: none"> ■ Percentage of survey respondents that rate the drinking water quality and sewer service as good or very good ■ Percentage of survey respondents that rate the quality of roadways and road signs in Miami-Dade County as good or very good ■ Percentage of survey respondents that rate flooding as a minor or major problem in their neighborhood

E. “No Net Loss” Concept Ignored

As noted above, the Department of Planning and Zoning has occasionally relied upon the “no net loss” language in the Strategic Plan in recommending denial of applications seeking expansions to the UDB. At the same time, however, the County has continued to permit the replacement of agricultural uses outside of the UDB with residential, institutional, and non-agricultural business uses.

Of special interest are non-agricultural residential uses. There are many small owner-occupied farm parcels located outside of the UDB in Miami-Dade County. However, there are far more non-agricultural residential parcels outside of the UDB. We are unaware of any effort by Miami-Dade County to prohibit the replacement of agricultural lands with non-agricultural residential uses in these areas.

The Redland area south of S.W. 184 Street (Eureka Drive) is recognized by many as the premiere agricultural area in the County. CDMP Policy LU-8G(i)(c) incorporates this concept into the CDMP, barring the expansion of the UDB into the Redland. We have reviewed the Property Appraiser records for all of the parcels in the Redland area that are developed with a home. One might expect that most of these lots are owner-occupied small farms or groves. Such an expectation does not, however, comport with reality, as the following findings from our analysis indicate:

Approximately 72 percent of the 2,112 parcels identified that are occupied with homes, or 1,517 parcels, are not classified “agricultural” for ad valorem tax purposes, which means that these parcels cannot demonstrate that they are used for a bona fide agricultural purpose.

Approximately 583 of the 2,112 parcels referred to in the preceding sentence have homes on them that were constructed since January 1990, nearly 80 percent of which are not classified agricultural for ad valorem tax purposes.

The average non-agricultural residential unit within the Redlands is on a lot less than 1.5 acres in size, including units constructed since January 1990.

From a broader perspective, the 2,112 Redlands parcels discussed above represent just less than 50 percent of the 4,328 residential parcels that our analysis identified outside the UDB on Agriculturally designated land. Included in the latter figure are 514 parcels located between S.W. 88 Street and S.W. 184 Street in the general vicinity of the Parkland site.¹ With the respect to these 4,328 parcels:

Approximately 71 percent are not classified as agricultural for ad valorem tax purposes.

1,374, or 31.7 percent, of the identified residential units outside the UDB have been constructed since January 1990, including 231 in the general vicinity of Parkland. More than 75 percent of the parcels that have been approved for home development since January 1990 are not classified agricultural for ad valorem tax purposes. These non-agricultural units occupy parcels that average less than 1.5 acres in size.

¹ Not included in the latter figure are parcels occupied by mobile homes or government-owned migrant worker housing.

Our analysis showed that agricultural activity, including the cultivation of row crops on large parcels, has co-existed with non-agricultural residential development outside the UDB for decades dating back into the 1950's.

F. Consistent Application Required by Law

Florida law requires the County to hold each property owner seeking development to the same uniform standards. See Broward County v. G.B.V. International, Ltd., 787 So. 2d 838, 842 (Fla. 2000) (development regulations must be “uniformly administered”). It is not permissible for the County to “pick and choose” when to apply a development standard.

By definition, the CDMP applies to all development orders, from UDB amendments to building permits. If the “no net loss” concept is enshrined in the CDMP and the re-designation of Agriculturally designated land for urban purposes is not consistent with the CDMP's policies, the issuance of development permits for non-agricultural residential structures outside the UDB is similarly inconsistent with the CDMP.

The County has continued to permit exurban residential development to carve up Agriculturally designated areas in direct contravention of the “no net loss” concept. Given the County's obligation to apply the CDMP uniformly, it therefore must be assumed that the “no net loss” concept is not a CDMP policy that can be applied in reviewing any application for development, including the Parkland CDMP application. The question becomes, therefore, whether Parkland will have a negative impact on “viable agriculture . . . lands.” (Strategic Plan at 19).

G. No Negative Impact on Viable Agricultural Lands

As explained above, the CDMP and Strategic Plan encourage the preservation of viable agricultural lands. The Parkland community is proposed to be developed on land that has been used for row crops. The approval and development of the Parkland community will not have an impact on viable agricultural lands.

As part of its recent Agricultural Land Retention Study, the County commissioned a report from the Institute of Food and Agricultural Sciences at the University of Florida (the “Institute Report”). The Institute conducted an in-depth review of the health of the County's agricultural economy and issued its Report in 2002. The Institute reported that most of the major problems faced by local farmers were “social and political considerations” that are the result of “national or state policies and international agreements.” (Institute Report at 50). This is especially true for row crops, which accounted for nearly 40,000 acres, or more than 40 percent of all agricultural acres in Miami-Dade County at the time of the preparation of the Institute's Report.

The Institute further reported that many large farms, especially those “growing vegetables . . . are facing serious economic challenges” largely from increased foreign competition. (Institute Report at 52). The Institute found that “[t]he economic returns to operators and landlords are currently insufficient to keep large acreages of row crop and grove land in agriculture, and the long-term prognosis is increasingly grim.” (Institute Report at 52-53).

Consistent with this finding, the Institute found that in the period between 1988-89 and 1997-1998, earnings for row crop vegetables declined from nearly \$275 million to less than \$170 million while employment in this segment of the County's agricultural activity dropped from over

10,000 workers to less than 6,200, or by nearly 40 percent. (Institute Report at 22). The Institute calculated that over 95 percent of row crops grown in Miami-Dade County are sold outside the County, making them more vulnerable to increased foreign competition. (Institute Report at 20). Reflecting these bleak trends and the uncertain future of the County agriculture industry, the Institute estimated that only 25 percent of Miami-Dade County farmers were under the age of 45, six percent under the age of 35. (Institute Report at 51).

Utilizing data generated by the Institute, Dr. Chuck Blowers, the Head of the Research of the Miami-Dade County Department of Planning and Zoning Research Division in 2002, prepared an analysis in which he estimated the future need for agricultural acreage. He estimated that by 2025, only about 23,900 acres would be needed for row crops, including the five major ones that included snap beans, tomatoes, potatoes, squash and sweet corn. His estimate of future viable acreage for row crops amounted to less than 60 percent of the amount at the time the Institute's review was conducted, or a reduction of approximately 16,100 acres.

The economic situation for row crop growers has not improved in any measurable way since the completion of the Institute's Report. At this time, only minimal amounts of tomatoes and potatoes are still being grown in Miami-Dade County. Discussions with farmers have also indicated the future of sweet corn as a viable crop is in doubt with the likely cost to production exceeding the market price. Corn production has declined to such an extent that Miami-Dade County farmers no longer send their corn to local packing houses, but instead to packing houses in the agricultural areas in the Belle Glade area. The amount of corn grown in Miami-Dade County is insufficient to support local packing house operations.

Of particular concern in this regard is the fact that the costs of fertilizer and chemicals have risen sharply in recent years as farmers in China, India and elsewhere compete for these inputs. Gas prices are also a factor. The farmers indicate that the profitability of snap beans, the County's most significant row crop, is also being challenged.

The fact that packing houses can function in the Belle Glade area but not in Miami-Dade County relates to several factors that in combination make it less expensive to produce crops there than in Miami-Dade County. Of critical importance in this regard is that crops grown there are not as susceptible to insect infestations, hence less spraying is required. The land there is also naturally amenable to the cultivation of row crops, not requiring the same amount of fertilization and drainage. More acreage is now available for row crop production than in the past because less land is being used for growing sugar. The emergence of the Belle Glade as a competitor for row crops coupled with the NAFTA-related foreign competition and rising costs have placed Miami-Dade County's row crop segment of the agricultural industry in a precarious position.

Based on the preceding, the farmers interviewed indicated that they will likely be reducing the amount of acreage in cultivation with the land they lease, such as the acreage that comprises the Parkland site. The farmers will concentrate their efforts on the land that they own. Accordingly, whether land remains in agricultural use is, from a practical point of view, not really a planning question but an economic one. If it does not make economic sense to continue to farm row crops on leased parcels, farmers will not do so, regardless of the CDMP designation of said parcels.

As indicated above, Dr. Blowers's analysis projected a reduction in the amount of land required for row crops of 16,100 acres. He also projected decreased amounts of land required for fruit trees and ornamentals, estimating that only a total of 52,000 acres would be needed in 2025 rather than the 80,000 that existed in 2002. Dr. Blowers assumed that the approximately 13,000

agricultural acres that existed within the UDB in 2002 would account for a portion of the reduction, with the remainder of reduced acreage being located in the County's Urban Expansion Areas ("UEAs").

Dr. Blowers's assumption that the expansion of the UDB into the UEAs would largely resolve the issue with the projected excess of agricultural land in the County is no longer realistic. We have analyzed the UEAs and concluded that large areas within the UEAs are in wellfield protection areas, within footprints of CERP projects and/or are comprised of wetlands. CDMP Policy LU-8G prohibits and/or discourages expansion of the UDB into these areas. Since it would be inappropriate to expand the UDB into many areas within the UEAs, it is not realistic to assume that development of the UEAs will create the necessary reduction of excess agricultural land. It is more appropriate to consider expansion of the UDB into lands that have been used for row crop production, such as the Parkland site, that also do not have attendant environmental issues.

In summary, the CDMP and Strategic Plan require the County to work to preserve viable agricultural lands. There is no obligation, however, for the County to preserve agricultural lands where the continuation of an agricultural use is not economically viable. The row crop industry in Miami-Dade County has been on a serious decline for multiple years and simply cannot be economically sustained in its current form. The removal of 960 leased acres of row crops from production, by reducing excess supply, will only have a salutary effect on the market for the remainder of the row crop producers in Miami-Dade County.

V. CONSISTENCY WITH POLICY LU-8G OF THE COMPREHENSIVE DEVELOPMENT MASTER PLAN

The following material will discuss the application of Policy LU-8G of the Miami-Dade County Comprehensive Development Master Plan ("CDMP") to the Parkland 2014 development.

Under the CDMP, the County's Urban Development Boundary ("UDB") is intended to be a flexible line subject to expansion when a need for additional land to support urban development has been demonstrated. (CDMP Policy LU-8F). Policy LU-8G of the CDMP guides the expansion of the UDB by establishing three categories of land outside the UDB:

- (1) Land that shall not be considered for expansion;
- (2) Land that shall be avoided if possible; and
- (3) Land that shall be given priority for inclusion within the UDB.

Among the categories of land that should be avoided under Policy LU-8G are lands designated for Agricultural use. Both local and state planners have recently taken the position that the expansion of the UDB into areas designated for Agricultural use would be inconsistent with the CDMP.

This position, however, is inconsistent with the manner in which the CDMP Land Use Element requires the County to review requests to expand the UDB under Policy LU-8G. The Policy requires the County to balance the desire to avoid expanding the UDB into certain areas with both the need to accommodate the need for additional urban land within the UDB and the policy of prioritizing the addition of land with certain listed qualities into the UDB. The following is a description of the three categories of land recognized in Policy LU-8G and the Parkland 2014 application's compliance with the Policy.

A. Land that Shall Not Be Considered

Policy LU-8G (i) provides that the following areas may not be considered for inclusion: (1) the Northwest Wellfield and West Wellfield Protection Areas; (2) Water Conservation Areas, Biscayne Aquifer Recharge Areas, and Everglades Buffer Areas designated by the South Florida Water Management District; and (3) the Redland agricultural area. A graphical depiction of these areas is attached as **Exhibit V-1**.

B. Land that Shall be Avoided

Policy LU-8G (ii) provides that the following areas shall be avoided when adding land to the UDB: (1) Future Wetlands as defined in the CDMP's Conservation and Land Uses Element; (2) Land designated for Agricultural use under the CDMP's Land Use Plan ("LUP") map; (3) Category One hurricane evacuation areas east of the Atlantic Coastal Ridge; and (4) Project footprints for the Comprehensive Everglades Restoration Plan ("CERP"). A graphical depiction of these areas is attached as **Exhibit V-2**.

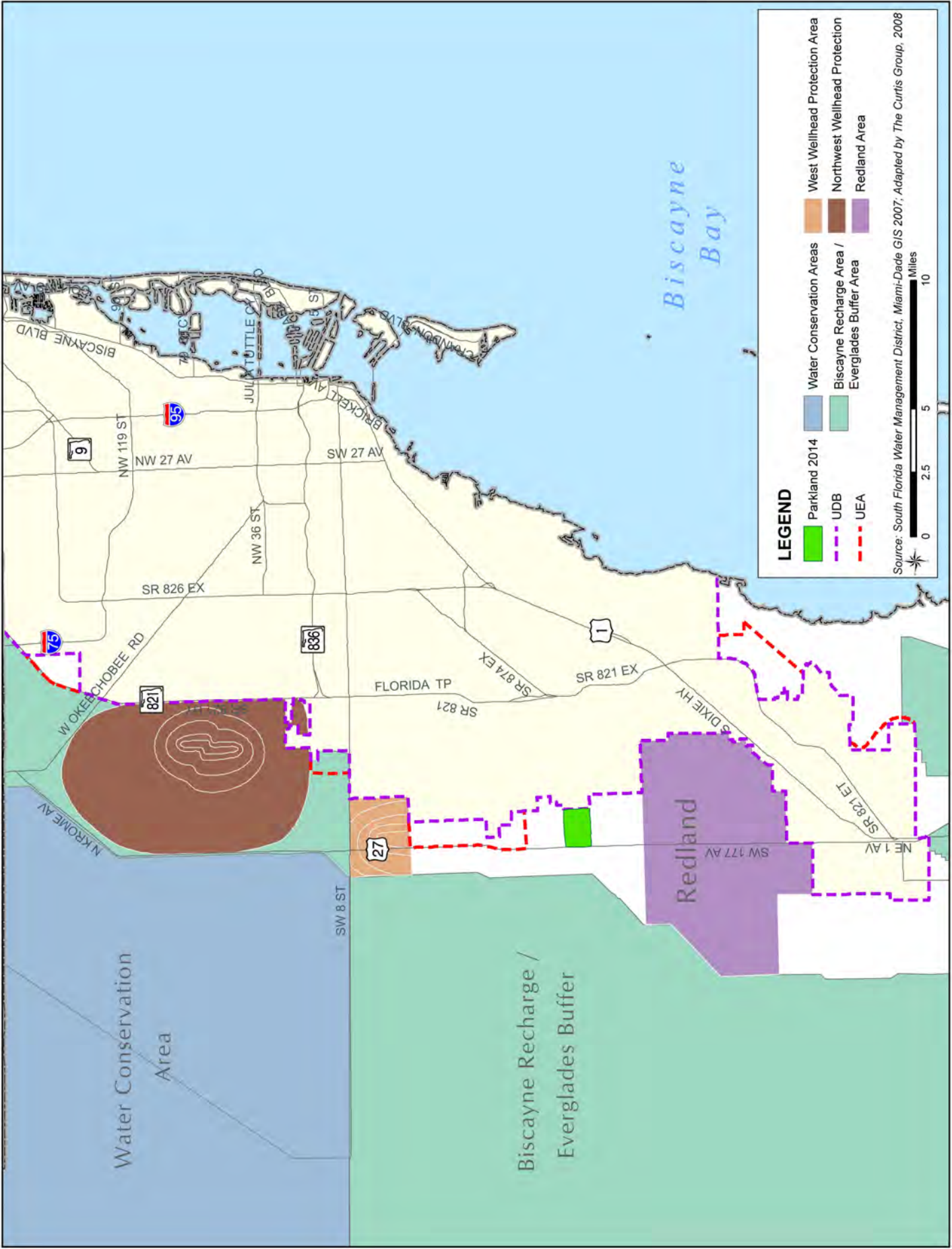
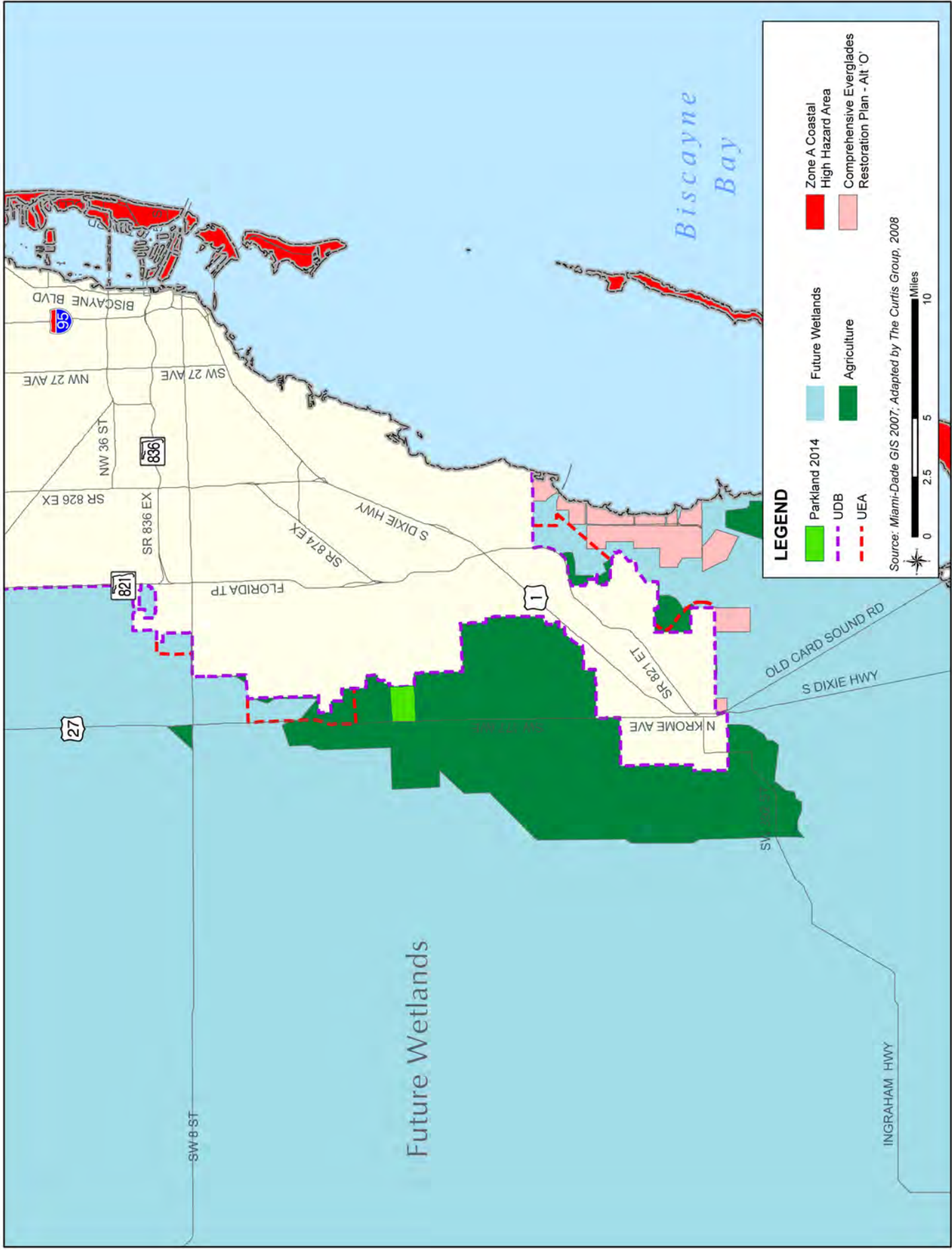


Exhibit V-1

PARCELS THAT SHALL NOT BE CONSIDERED

PARKLAND



It is important to note that **Exhibit V-2** clearly demonstrates that all of the land outside of the UDB, is within one or another of the categories of land that “shall be avoided” for UDB expansion under Policy LU-8G (ii).

For example, large portions of the CDMP’s Urban Expansion Areas (“UEAs”), which assuming no other issues, are expected to be included within the UDB sooner than other areas, are designated for Agriculture use on the LUP map.² The County has determined that these UEAs, while designated for Agriculture use, should be developed in the near future in order to accommodate the County’s growing population.

It is therefore readily apparent that Policy LU-8G requires the County to balance the need for land to support urban development against the desire to protect viable agricultural or environmentally important lands. That is where the third category of land recognized in Policy LU-8G, lands that should be encouraged for inclusion, becomes relevant.

C. Land that Should Be Given Priority for Inclusion

Policy LU-8G (iii) provides the following areas should be given priority for inclusion in the UDB: (1) Land within Planning Analysis Tiers having the earliest projected date of depletion of supply; (2) Land contiguous to the UDB; (3) Locations within one mile of a planned urban center or extraordinary transit service; and (4) Locations having projected surplus service where necessary facilities and services can be readily extended. Parkland 2014’s location is consistent with all four of the criteria of Policy LU-8G (iii).

First, Parkland 2014 is located in the Planning Tier with the earliest projected depletion of any area in the County. Based on the County’s estimates, the area (West South-Central Tier) in which Parkland is located will run out of developable residential land in 2009, making the Parkland area a priority for inclusion in the UDB.

Second, Parkland 2014 is immediately contiguous to the existing UDB line.

Third, Parkland 2014 is located within a mile of planned extraordinary bus service and the developer has committed, as a condition of Development of Regional Impact approval, to work with the Miami-Dade Transit Agency to ensure that the extraordinary bus service is both maintained and extended to serve the entire Parkland 2014 community.

Finally, Parkland 2014 is in an area where infrastructure and services can be readily extended. The developer has committed, as a condition of Development of Regional Impact approval, to extending all required infrastructure to the site and has also committed to providing wastewater re-use, school, fire, and police facilities that will be available to serve populations both within the development and in the surrounding area.

² Portions of the UEA located in the West Kendall area are also within Comprehensive Everglades Restoration Plan (“CERP”) project footprints and therefore completely inappropriate for urban development.

D. Application of Balancing Test

As explained above, the inquiry required by Policy LU-8G does not end when it is determined that a parcel of land is within an area that “shall be avoided” for inclusion in the UDB. If that was the end of the inquiry, no land could ever be added to the UDB in Miami-Dade County, a result which is inconsistent with the requirement of CDMP Policy LU-8F that the UDB contain sufficient land to accommodate at least fifteen years of urban growth.

Because all land outside the UDB is within one or another category of land that “shall be avoided” for inclusion in the UDB, the CDMP requires the County to balance the desire to avoid such lands with: (1) the need to accommodate fifteen years of projected urban growth; and (2) the factors that encourage the addition of certain land into the UDB.

Parkland 2014 complies with all of the listed factors that encourage the expansion of the UDB into an area. The Parkland 2014 team has separately addressed the 15 year supply issue and demonstrated that there is a need for additional land to support urban development pursuant to CDMP Policy LU-8F. We therefore believe that the required balancing test favors the expansion of the UDB to accommodate the Parkland 2014 community.

VI. NEED FOR HOSPITAL

The Parkland 2014 master plan designates an approximate 15-acre site for a hospital and medical offices located at the southeast corner of proposed S.W. 136 Street and S.W. 167 Avenue. Parkland has received a letter of intent from a general hospital operating within Miami-Dade County to provide a facility at this location; however, the information set forth in that letter is proprietary and confidential and the letter cannot be made public at this time.

In Governor Crist's 2008 budget proposal, he unveiled a plan "to eliminate the certificate-of-need process for the construction of new hospitals." This effort resulted in the adoption of SB 2326 in the recent 2008 legislative session. This bill constituted a legislative compromise that does not eliminate the "CON" process, but modified it to reduce the required criteria in CON applications for general hospitals, and to make challenges to CON decisions more difficult. Many knowledgeable individuals in the health care industry believe that the CON process may be entirely eliminated in the future.

Regardless, Parkland maintains that there is a strong need for an additional general hospital to service the South Dade/West Kendall area. Parkland is prepared to demonstrate such need, and based upon this need commits that the hospital/medical office site as designated in the Parkland 2014 master plan shall only be used for hospital and medical office purposes. It is the Parkland applicant's expectation that appropriate DRI development order conditions will be imposed regarding the hospital use of this parcel.

VII. NATIONAL PARK SERVICE RESPONSE

The following materials are provided to respond to questions raised by the Department of Planning and Zoning regarding the National Park Service letter.

EAS ENGINEERING, INC.

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August 5, 2008

Miami-Dade County Department of Planning and Zoning
Attn: Mark C. LaFerrier, AICP, Director
111 NW 1st Street, Suite 1210
Miami, Florida 33128

Re: Parkland DRI; National Park Service Response

Dear Mr. LaFerrier:

Please accept this letter as our response to comments written by the National Park Service (NPS) dated April 1, 2008 (copy enclosed). We believe the concerns raised by the NPS can be adequately addressed. The Parkland application is consistent with the Miami Dade County's Consumptive Use Permit (CUP) issued in November of 2007 and will have no impacts to either Everglades National Park (ENP) or Biscayne National Park (BNP).

Miami Dade County's CUP

There is a widespread misconception that the County's CUP water allocation is tied to the existing service area of the County's Water and Sewer Department (WASD). Based on this belief, the South Florida Water Management District (SFWMD) and the Department of Community Affairs (DCA) have in the past objected to applications seeking to expand the County's Urban Development Boundary (UDB). The objections were based on the belief that expansion of the UDB, and the attendant urban development of such areas, would create "new" water demand unaccounted for under the CUP.

The County's water allocation under the CUP is not based on the projected population from a specific geographic area (i.e. the area within the UDB), but based upon a projected population increase for the County determined by births, deaths and in/out migration. Land use decision making, including expansions to the UDB, has no role in the calculation of the projected population. To the contrary, the County's Comprehensive Development Master Plan ("CDMP") requires the County to ensure that the UDB retains adequate land to support the expected population growth.

Mr. Mark C. LaFerrier, AICP Director
Miami-Dade County Department of Planning and Zoning
August 5, 2008

- page 2 -

The County has been provided a water allocation intended to serve the projected population. It remains within the County's discretion to determine where that population is distributed. The population that would occupy the proposed Parkland 2014 community is already a part of the County's projected population.

Miami-Dade County's Department of Planning and Zoning prepared a detailed response to this issue during the review of the April 2007 cycle CDMF amendment applications. A copy of that discussion is attached. Both SFWMD and the Florida Department of Environmental Protection have also issued new guidance, supporting the conclusion that the expansion of the UDB does not create new, unplanned for, water demand. Copies of that correspondence are also attached.

Non-Potable withdrawal on ENP and/or BNP

The current land use at the Parkland 2014 site is row crop agriculture. Agricultural irrigation has been occurring at the site for years. Agricultural CUP permit applications were submitted to the SFWMD prior to "deadline" imposed by the SFWMD for agricultural CUPs. The total requested irrigation allocation in these applications is 3.1 MGD. The 3.1 MGD requested in the applications is consistent with the current withdrawal from the wells on the site.

It is currently estimated that the total irrigation demand for the Parkland 2014 project will be 0.98 MGD. Of this amount, 0.13 MGD will come from wastewater reuse. An analysis of the estimated irrigation flows prepared by Ford Engineering, Inc. is attached. The balance (0.85 MGD) would be drawn from the new lakes within the development, clearly a reduction in the historic 3.1 MGD withdrawal.

The aquifer in South Miami-Dade County is extremely transmissive. As we have previously noted, a withdrawal of 0.85 MDG will have no affect on ENP. In order to resolve the concerns raised by NPS, we have prepared a simple ModFlow model to evaluate the proposed withdrawal of non-potable water. A copy of the model's results is attached. The model demonstrated that the expected 0.01 foot drawdown does not extend beyond the boundaries of the Parkland 2014 site. Based on the modeling, there will be no impact on the water levels within ENP from the proposed development.

Similarly, the proposed development will have no impact on BNP. Stormwater onsite will be managed by retaining 100% of the 100-year, three-day storm event within the proposed lakes. The Parkland 2014 proposed stormwater management is a vast improvement over the current uncontrolled stormwater management condition. As a result of this improved stormwater treatment there will be a resulting improvement to water quality entering the regional system, some of which may ultimately reach BNP.

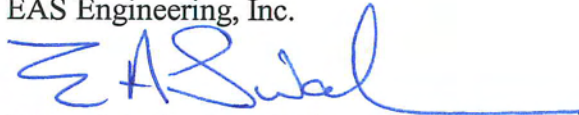
Mr. Mark C. LaFerrier, AICP Director
Miami-Dade County Department of Planning and Zoning
August 5, 2008

- page 3 -

In conclusion, both the SFWMD and DCA now agree that amendments to the County's UDB have no impact on the water demand anticipated under the County's CUP. We have also conducted modeling that has demonstrated that there will be no impact to area groundwater resources resulting from the groundwater withdrawals for project irrigation. To the contrary, the proposed Parkland 2014 development will result in a significant reduction in the amount of groundwater withdrawn from the site as compared to the current agricultural use on the property.

If you have any questions or need additional information, please feel free to call us.

Sincerely,
EAS Engineering, Inc.



Edward A. Swakon, P.E.
President

spl
enclosures

cc: Rob Curtis (w/encl)
Mark Lewis, Superintendent, Biscayne National Park (w/encl)
Dan Kimble, Superintendent, Everglades National Park (w/encl)

05-021 Parkland Subdivision

Estimated Irrigation Flows

7/22/2008

Included Areas	Area (Acres)*	Irrigation Requirements (GPD)**	Service	
			Wastewater Re-use (GPD)	Lake (GPD)
Residential Low Density Green Areas	77.08	286,969	0	286,969
Residential Low/Medium Density Green Areas	40.40	150,409	0	150,409
Residential Medium Density Green Areas	36.73	136,746	0	136,746
Park/Landscaping Areas	63.18	235,219	0	235,219
Median Areas	18.79	69,955	69,955	0
Commercial/Town Center Green Areas	5.11	19,025	19,025	0
Retail/Office Green Areas	2.20	8,191	8,191	0
Hospital/Medical Office Green Areas	3.00	11,169	11,169	0
Industrial Green Areas	6.31	23,492	23,492	0
School Green Areas	10.50	39,092	0	39,092
TOTALS:	263.30	980,266	131,831	848,434

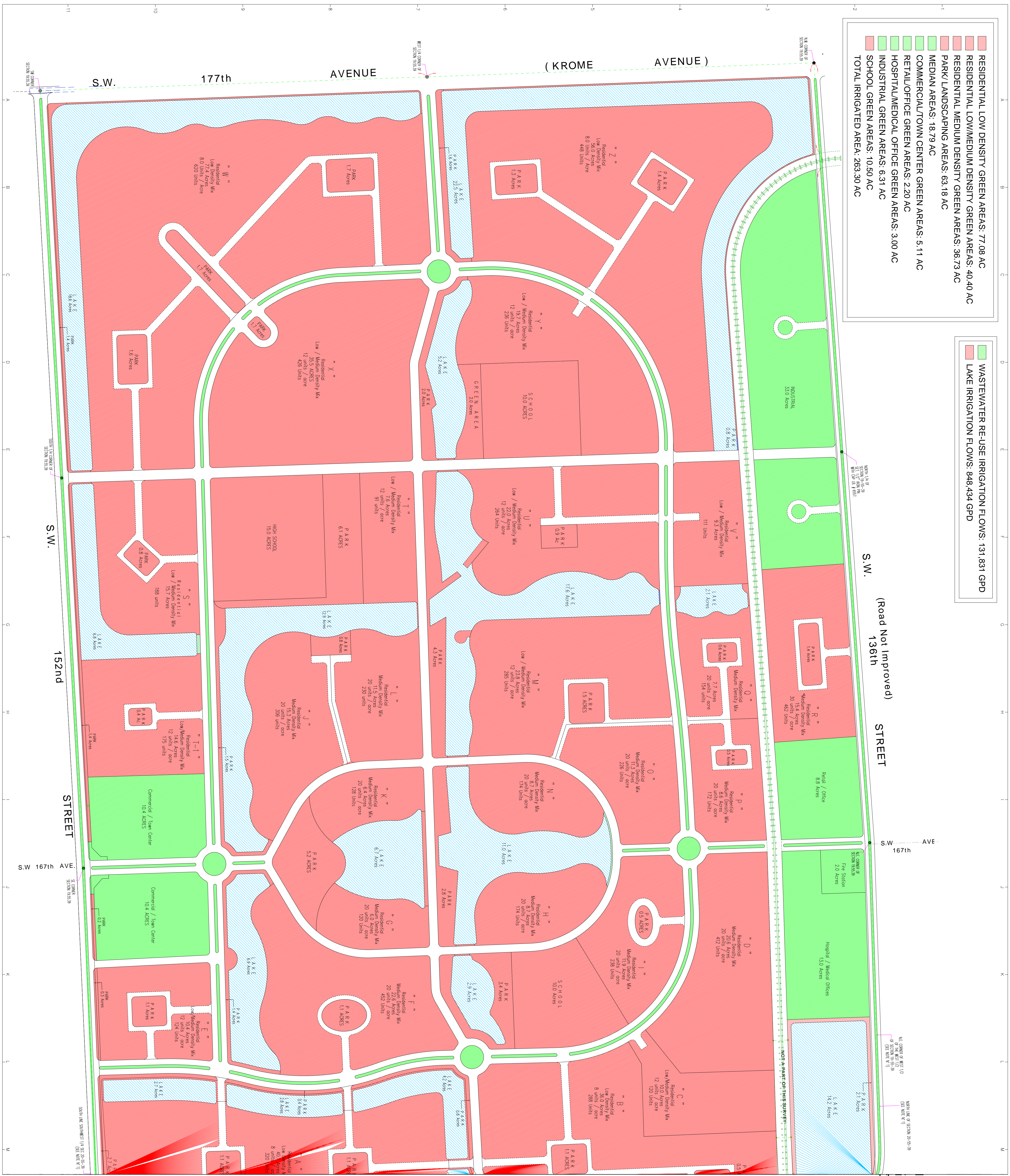
*Areas based off latest site plan provided by Pascual, Perez, Kiliddjian & Assoc. dated 6/14/07
Green areas assumed from typical zoning requirements and are subject to change

**Irrigation flows are for 1" of rainfall per acre per week
(0.08ft/in./week * 43,560sf/ac * 7.48gal/cf) / (7days/week) = 3,723 GPD/AC

100-Year 3-Day Estimated Rainfall Volume: 892.52ac-ft 25-Year 3-Day Estimated Rainfall Volume: 695.60ac-ft

- RESIDENTIAL LOW DENSITY GREEN AREAS: 77.08 AC
- RESIDENTIAL LOW/MEDIUM DENSITY GREEN AREAS: 40.40 AC
- RESIDENTIAL MEDIUM DENSITY GREEN AREAS: 36.73 AC
- PARK/LANDSCAPING AREAS: 63.18 AC
- MEDIAN AREAS: 18.79 AC
- COMMERCIAL/TOWN CENTER GREEN AREAS: 5.11 AC
- RETAIL/OFFICE GREEN AREAS: 2.20 AC
- HOSPITAL/MEDICAL OFFICE GREEN AREAS: 3.00 AC
- INDUSTRIAL GREEN AREAS: 6.31 AC
- SCHOOL GREEN AREAS: 10.50 AC
- TOTAL IRRIGATED AREA: 263.30 AC

- WASTEWATER RE-USE IRRIGATION FLOWS: 131,831 GPD
- LAKE IRRIGATION FLOWS: 848,434 GPD



PARKLAND

IRRIGATION AREAS
LENNAR HOMES, INC.

M. ECHEZARRETA, P.E.
CERT. OF AUTHORIZATION No. 6921

730 NW 107th AVENUE, 4th FLOOR
MIAMI, FL 33172

SEC 19/20 TW55 R39
MIAMI, FLORIDA

T-3007
G. GAUJERA
G. GAUJERA
M. ECHEZARRETA
SEE LABELS
05/22/08

Exhibit B

**Department of Planning and Zoning (DP&Z)
Revised Response to the Florida Department of Community Affairs (DCA)
Objections, Recommendations and Comments (ORC) Report
DCA No. 08-1 Addressing the April 2007 Cycle
Applications to Amend the Comprehensive Development Master Plan (CDMP)**

March 31, 2008

This report contains the initial responses of the Department of Planning and Zoning (Department), to the objections contained in the referenced Objections, Recommendations and Comments (ORC) Report issued by the Florida Department of Community Affairs (DCA) dated February 26, 2008. The DCA issued objections to all six (6) private applications and two of the text applications (Applications 14 and 16) transmitted for review and comment by the Miami-Dade County Board of County Commissioners.

In the following presentation, the DCA's Objection and corresponding Recommendation are presented, followed by a response of the Department of Planning and Zoning. Immediately after the Objection number, notations are provided indicating which Applications that the Objection and Recommendation address. The issuance of the responses contained herein does not preclude the issuance of other future responses by the Department. Moreover, the responses issued by the Department are not necessarily those of the applicants, Local Planning Agency (Planning Advisory Board), or Board of County Commissioners, which may offer their own responses to points raised in the ORC report.

***DCA OBJECTION #1: INADEQUATE PLANNING FOR POTABLE WATER SUPPLY
(Applies to Applications No. 5, 8, and 9)***

The proposed future land use changes in Amendments/Applications 5, 8, and 9 all increase the potential demand for potable water from the properties involved. All three applications also require that the County's Urban Development Boundary (UDB) be moved to accommodate the proposed urban uses. According to information provided by the South Florida Water Management District (District) in its report to the Department on Amendment 08-1, the 20-year Consumptive Water Use Permit (CUP) issued by the District to Miami-Dade County in November 2007 was based solely on population projections within the current UDB. The same population projections underlie DCA Table 1 in the settlement agreement between the Department and Miami-Dade County to bring Amendment 06-1 into compliance. DCA Table 1 demonstrates that the County Water and Sewer Department (WASD) will have a sufficient potable water supply to meet the expected demand in its service area out to 2030. The demand estimates were based on population projections for WASD's service area. The information contained in

DCA Table 1 was instrumental in the compliance agreement between the Department and County, because it demonstrated that the potable water demands of ordinary growth would be accommodated by the water to be produced from WASD's proposed new alternative water supply sources, which were included in the capital facilities schedule in the Miami-Dade County Capital Improvements Element.

The three proposed UDB amendments, however, are located outside the delineated WASD service area, which was the basis of the water demand projections agreed upon between the District and WASD for the CUP and for DCA Table 1. If this potable water service area is expanded to include the three UDB amendments, it would be expected to have a greater potential population and a greater potential water demand than the existing delineated service area used to provide the basis for the CUP. This greater potential water demand must be matched by an additional planned supply of water. The three UDB amendments fail to identify the new water supply source, nor are the amendments supported by adequate data and analysis to demonstrate they can be provided an adequate water supply based upon current water sources.

The District, in its report to the Department, also points out that until the new Hialeah Floridan Aquifer reverse osmosis facility goes on-line (4.72 million gallons a day scheduled for 2012), the County has limited "new" water to meet its anticipated growth within the UDB and must rely heavily on water conservation and system savings to avoid a deficit. A portion of the water from this plant is already committed to the City of Hialeah as part of the 2006 settlement agreement between the Department and Miami-Dade County (Case No. 06-2395GM). Therefore, data and analysis to document the availability of water to meet the anticipated municipal growth for the next 5 years is essential to ensure adequate water supply before approving land uses outside the UDB that might compete for the same supply. The District also notes—(1) that the requirements of the limiting conditions within the CUP would need to be met prior to providing water supply to any development(s) outside of the current service area; and (2) that any delays in completing the County's \$1.6 billion worth of new water and sewer infrastructure projects will cause a shortfall of water supply with respect to projected growth within the existing UDB.

DCA Recommendation:

The County should not adopt the proposed land use changes until it can demonstrate the necessary coordination of land use approvals with an assured supply of potable water. Revise the amendments to demonstrate coordination of the proposed land use changes with the planning and provision of potable water supplies. Identify any needed facility improvements for the 5- and 10-year planning time frame. These improvements should be coordinated with the Water, Sewer, and Solid Waste Element and the Capital Improvements Element, including implementation through the 6-year schedule of capital improvements of any facilities needed during that time frame.

DP&Z Response:

Miami-Dade County Department of Planning and Zoning, after each decennial census, generates its population estimates and projections for the County. These population estimates and projections are then disaggregated into the Minor Statistical Areas (MSAs), sub-areas of census tracts, to help identify the County's growth trends by geographic area and are routinely updated based upon local trends and conditions. Updates and amendments to the population projections, contained in the CDMP Land Use Element, are considered for adoption by the Board of County Commissioners approximately every four years; the latest projections being adopted in 2004. It was the 2004 adopted population estimates and projections that were utilized by WASD in their water supply planning efforts and formed the basis for determining future water demands in the WASD utility service area.

DCA has indicated that any change of land use outside of the service area (the Urban Development Boundary (UDB)) will result in an increase in water demand not accounted for by the recently approved Water Use Permit (WUP). The Department asserts that the UDB helps to manage potential development sprawl within the County but that movement of this line does not increase the population. The population growth of the County is based on rate of births, deaths, in-migration and out-migration and is determined independent of land use. The assignment of the County's estimated population to the MSAs takes into consideration the amount of zoned developable land and makes assumptions regarding the timing of this development based upon past trends. However, inclusion of additional vacant land into the UDB does not change the existing or projected population for the County, but rather may adjust the spatial distribution of the population assigned to the MSAs. Likewise the existing population within the WASD utility service area will not change should vacant land (no existing population) be added. However, the projected population for the utility service area may shift between MSAs based upon changes to the development pattern created by additional commercial or residential supply in that area.

To properly account for these potential shifts in population, as noted above, the County periodically revises its population projections, both at the countywide and the MSA levels, and prepares these updates for inclusion into the CDMP. Such updates are a routine component of any long-range planning process as documented in the legislative requirements to update the regional water supply plans every five years. This concept was also addressed with the issuance of the 20-year WUP, as limiting condition 49, which requires a compliance report that updates the components of the WUP, including population estimates and reuse and water supply project status, to "maintain a reasonable assurance the permittee's use will continue to meet the applicable rules and statute for the remainder of the permit duration.

As stated above the projected WASD service area population will not be increased by approval of these three land use amendments, and this population estimate will be revisited every five years and revised if necessary. The Department also recognizes that building trends are not linear and that more development occurs in some years than

others. This fluctuation in development and the resulting water demands may not coincide with the completion of those planned alternative water supply and reuse projects necessary to accommodate these anticipated water demands. An analysis of the finished water demands of the 3 applications, based on largest water demand produced by the proposed development scenarios are as follows:

Application No. 5 – The proposed development, based on the submitted application and proffered restrictive covenant, would prohibit residential units. The Land Use Plan map amendment would allow for two scenarios. The first is based on a commercial use of Parcel A and offices on Parcel B. The second scenario contemplates commercial development on Parcel A with a 2,000 student station High School on Parcel B. The estimated water demands for each of these scenarios, based upon water demand generation tables codified in Chapter 24, Miami-Dade County is as follows:

APPLICATION 5

Scenario	Proposed Use	Square Feet (sf) / Number of Students	Water Demand rates (Chapter 24)	Estimated Water Demand (gpd)
1	Commercial/Retail	357,192 sf	10 gpd/100 sf	35,719
	Offices	655,578 sf	10 gpd/100 sf	65,558
Total Estimated Water Demand for Scenario 1				101,277
2	Commercial/Retail	357,192 sf	10 gpd/100 sf	35,719
	High School	2,000 students w/showers & 268 employees	20 gpd/student 15 gpd/employee	44,020
Total Estimated Water Demand for Scenario 2				79,739

Source: Miami-Dade County Department of Planning and Zoning, March 2008, base on criteria from Chapter 24, Miami-Dade County Code.

Gpd = gallons per day

Application No. 8 – the proposed development, based on the transmitted covenant as accepted by the BCC, would prohibit residential units. The water demand for a commercial scenario, based upon water demand generation tables codified in Chapter 24, Miami-Dade County is as follows:

APPLICATION 8

Scenario	Proposed Use	Square Feet (sf)	Water Demand rates (Chapter 24)	Estimated Water Demand (gpd)
1	Commercial/Retail	670,824 sf	10 gpd/100 sf	67,082

Source: Miami-Dade County Department of Planning and Zoning, March 2008, base on criteria from Chapter 24, Miami-Dade County Code.

Gpd = gallons per day

Application No. 9 - the proposed development was transmitted to DCA without acceptance of a covenant. Therefore, the property could be developed under two scenarios. The first scenario would include residential on Parcel A and commercial development on Parcel B. A second scenario is based on residential development of both Parcels A and B. The water demands for each of these scenarios, based upon water demand generation tables codified in Chapter 24, Miami-Dade County is as follows:

APPLICATION 9

Scenario	Proposed Use	Square Feet (sf) / Number of Students	Water Demand rates (Chapter 24)	Estimated Water Demand (gpd)
1	Commercial/Retail	174,240 sf	10 gpd/100 sf	17,424
	Single Family	509 detached units	350 gpd/unit	178,150
Total Estimated Water Demand for Scenario 1				185,574
2	Single Family	509 detached units	350 gpd/unit	178,150
	Townhome	130 attached	250 gpd/unit	32,500
Total Estimated Water Demand for Scenario 2				210,650

Source: Miami-Dade County Department of Planning and Zoning, March 2008, base on criteria from Chapter 24, Miami-Dade County Code.

Gpd = gallons per day

Using the estimated highest demand for each of the above development scenarios, the potential water demand of the three applications is estimated to be 379,000 gallons per day. Realistically, development of these properties would not be completed due to platting, zoning and permitting requirements until sometime between 2010 and 2012. Assuming a 3-year buildout timeframe of 2011, (similar to a concurrency review) the projected water demand of the WASD utility area is estimated at 359.54 million gallons per day (mgd). In accordance with DCA Table 1 (see Attachment 3), as agreed to by the County, DCA, and the SFWMD, the County is anticipated to have 12.36 mgd surplus water in 2011. Additionally, during the 2007 and 2012 timeframe, the timeframe prior to the first update of the WUP permit, surplus water is anticipated to range between 0.43 mgd in 2007 to 8.16 mgd in 2012. In no year during this timeframe does the surplus fall below 0.43 mgd; a level above the .359 mgd estimated for the projects. The WUP permit will be revisited in 2012 to update population estimates (based on the 2010 census data) and water supply projects, if necessary.

DCA points out concerns from the SFWMD that "until the new Hialeah Floridan Aquifer reverse osmosis facility goes on-line (4.72 million gallons a day scheduled for 2012), the County has limited "new" water to meet its anticipated growth within the UDB and must rely heavily on water conservation and system savings to avoid a deficit." It is unclear why the SFWMD has these concerns since water conservation and systems savings have been proven to reduce demands and ultimately result in less water being required by growth. These are recognized as credits in the WUP issued by the SFWMD. The surplus water during the 2008-2011 timeframe is based on three factors; 1) the City of North Miami Beach no longer purchasing water from the County; 2) accelerated water

conservation measures undertaken by the County; and, 3) the addition of 4.7 mgd Floridan Aquifer Blending project at the Hialeah-Preston Water Treatment Plant scheduled for completion in 2009. These projects are discussed below.

The City of North Miami Beach is currently a retail customer. This City has its own water utility and alternative water supply projects, which are intended to serve the population within the City's service area. In 2007 the City came off the WASD system, with the exception of a 1 mgd demand that will be reduced to no demand by mid-2008. This reduction decreased the County's service area demand by approximately 25,000 persons, which equates to a water reduction of 3.875 mgd.

The County's water conservation efforts were projected to produce between 1.086 mgd in 2007 and 1.286 in 2012 based upon information provided in Table 5 (Appendix E) of the Revised Support Document. This savings has been accepted by the SFWMD and is included as a credit against the water demand in the WUP. Data supplied by WASD has indicated that the water savings realized during the 2007 calendar year was 1.48 mgd, an additional savings of .359 mgd.

This savings was due to extensive conservations and education efforts undertaken by the County, which resulted in WASD meeting all their targeted conservation goals and exceeding their goals in the following areas:

Conservation Measure	2007 Targeted Goal	2007 Actual	Percent Complete
Shower Exchange	3200 Showerheads	8117 Showerheads	253.7
Senior and Low Income Retrofits	750 Retrofits	806 Retrofits	107.5
High Efficiency Toilets	750 Rebates	750 Rebates	100.0
County Owned Facility Audits	25 Audits	50 Audits	200.0

A full listing of the conservation measure goals and completions are included in Attachment 4 attached along with the conservation events held by the County in 2007.

Finally, the SFWMD has incorrectly stated that the first permit project to come on online is the City of Hialeah Reverse Osmosis (RO) plant in 2012. WASD is currently using a blending of Floridan and Biscayne aquifer waters at the West and Southwest wellfields and is developing the infrastructure necessary to blend waters from these aquifers at the Hialeah-Preston plant. This project, listed in the WUP permit, is due to come on line in 2009 and will yield 4.7 mgd. The cost of the project, listed in the County's CIE as Project 20C on Table 12, is \$10.4 million dollars.

These above referenced projects demonstrate that the WASD utility has sufficient water to account for the normal growth of the County. The aggressive efforts by the County to promote water conservation has resulted in additional water which, if necessary would be used for planned growth. Additionally, WASD, to assure the continued availability of water supplies as new development occurs, is currently developing a water allocation

system in compliance with Section 163.3180(2)(a), Florida Statutes, which states that "prior to approval of a building permit or its functional equivalent, the local government shall consult with the applicable water supplier to determine whether adequate water supplies to serve the new development will be available no later than the anticipated date of issuance by the local government of a certificate of occupancy or its functional equivalent".

The water allocation system will track the amount of water being allocated to serve all new construction, additions, renovations or changes in use requiring increases in water consumption. This system allows WASD to determine the current water supply available to serve new retail users within the WASD's service area and wholesale customers, while ensuring that the allocation in the Miami Dade County's 20-year water use permit is not exceeded. To ensure an equitable water allocation system, water will be allocated at the time of platting, at which time a parcel of land is evaluated to determine whether the existing water and sewer infrastructure can support the proposed project or the Developer must agree to improve the infrastructure to accommodate the development activity. This often occurs one to two years prior to the issuance of a building permit or its functional equivalent. The water allocation will be reserved as long as the developer complies with the terms and conditions of the agreement. In addition, water will be allocated prior to the issuance of a building permit. After the issuance of a building permit, the water will be reserved as long as the building permit remains active. The water allocation will be de-allocated when a water meter is set, or a Certificate of Occupancy or Use, or an Occupational License is issued. The total gallons of water required for a specific development activity or proposed use will be calculated according to the usage flows included in Chapter 24 of the Code of Miami-Dade County.

Currently, WASD is amending Chapter 32 of the Code of Miami Dade County to include requirements for water allocation. The law will not allow any development activity to be platted or such development approved or building permit to be issued without an approval letter from WASD specifying the amount of potable water allocated for such development activity. This law will extend to WASD's wholesale customers. It is anticipated that revisions to Chapter 32 will be approved by the Board of County Commissioners by September 2008, and the water allocation system be fully implemented by the end of 2008

***DCA OBJECTION #2: 10-YEAR WATER SUPPLY FACILITIES WORK PLAN
(Applies to Applications No. 13 and 16)***

The Department objects to Application 13 because the proposed Water Supply Facilities Work Plan (Work Plan) does not identify and evaluate the potable water utilities serving the unincorporated areas of the County, other than the Miami-Dade County Water and Sewer Department (WASD).

In addition, according to the comments received from the South Florida Water Management District, the County's 10-year water supply facilities work plan and the

ATTACHMENT 3

DCA TABLE 1

DCA TABLE 1 (3/6/2007)
Miami-Dade County Water and Sewer Department
Average Annual Daily Demand (AADD) Finished Water (MGD)
20-Year WUP Combined Biscayne Aquifer (BA) and AWS Water Demand Projection

Year	Projections			Biscayne Aquifer (BA) Finished Water Allocation ^(c) (MGD)	Water Conservation ^(d) (MGD)	Alternative Water Supply Projects				Totals		
	Population Served ^(a)	Finished Water (gpcd)	Projected AADD Finished Water ^(b) (MGD)			New Upper Floridan Aquifer WTP ^(e) (MGD)	Floridan Aquifer Blending ^(f) (MGD)	Reuse (Irrigation)	Reuse/Reclaimed Water ^(g) (MGD)	Recharge Credit	Available AADD Water Supply (MGD)	Contingency/ Surplus ^(h) (MGD)
TOTAL MIDWASD WATER SYSTEM SERVICE AREA												
2006**	2,200,000	155	340.80	340.80								
2007	2,250,944	155	348.90	340.80	1.11	0.0	7.4	0.0	0.0	0.0	349.31	0.42
2008	2,230,895	155	345.79	340.80	2.22	0.0	7.4	0.0	0.0	0.0	350.42	4.63
2009	2,260,476	155	350.37	340.80	3.45	0.0	12.2	0.0	0.0	0.0	356.45	6.07
2010	2,290,058	155	354.96	340.80	4.67	0.0	12.2	3.0	0.0	0.0	360.67	5.71
2011	2,319,639	155	359.54	340.80	5.90	10.0	12.2	3.0	0.0	0.0	371.90	12.36
2012	2,349,221	155	364.13	340.80	6.29	10.0	12.2	3.0	0.0	0.0	372.29	8.16
2013	2,378,803	155	368.71	340.80	6.70	10.0	12.2	3.0	0.0	0.0	372.70	3.99
2014	2,408,385	155	373.30	340.80	7.10	10.0	12.2	3.0	18.0	18.0	391.10	17.80
2015	2,438,819	155	378.02	340.80	7.50	10.0	12.2	4.0	18.0	18.0	392.50	14.48
2016	2,463,169	155	381.79	340.80	7.90	10.0	12.2	4.0	18.0	18.0	392.90	11.11
2017	2,487,519	155	385.57	340.80	8.27	10.0	12.2	4.0	18.0	18.0	393.27	7.70
2018	2,511,869	155	389.34	340.80	8.64	15.0	12.2	4.0	18.0	18.0	398.64	9.30
2019	2,536,219	155	393.11	340.80	9.00	15.0	12.2	4.0	18.0	18.0	399.00	5.89
2020	2,560,569	155	396.89	340.80	9.37	15.0	12.2	4.0	38.0	38.0	419.37	22.48
2021	2,584,918	155	400.66	340.80	9.74	15.0	12.2	4.0	38.0	38.0	419.74	19.08
2022	2,609,268	155	404.44	340.80	10.12	15.0	12.2	4.0	38.0	38.0	420.12	15.68
2023	2,633,618	155	408.21	340.80	10.48	15.0	12.2	4.0	38.0	38.0	420.48	12.27
2024	2,657,968	155	411.99	340.80	10.84	15.0	12.2	4.0	38.0	38.0	420.84	8.85
2025	2,682,318	155	415.76	340.80	11.21	15.0	12.2	4.0	38.0	38.0	421.21	5.45
2026	2,706,668	155	419.53	340.80	11.58	15.0	12.2	4.0	53.0	53.0	436.58	17.05
2027	2,731,018	155	423.31	340.80	11.95	15.0	12.2	4.0	53.0	53.0	436.95	13.64
2028	2,755,368	155	427.08	340.80	12.31	17.5	12.2	4.0	53.0	53.0	439.81	12.73
2029	2,779,718	155	430.86	340.80	12.68	17.5	12.2	4.0	53.0	53.0	440.18	9.33
2030	2,804,068	155	434.63	340.80	13.05	17.5	12.2	4.0	53.0	53.0	440.55	5.92

Footnotes:

- a. Populations projections agreed to by the SFWMD. Population served includes both the WASD retail customers and the wholesalers/large users. City of North Miami Beach drops out after 2007.
- b. Finished AADD Projections between 2007 and 2030 assume 155 gpcd total water system demand. North Miami Beach drops out in 2008. Hialeah and North Miami are included through 2030.
- c. Average annual daily demands of finished water for 2006** represent the 12 months preceding 4/1/2006 per SFWMD Rule and equate to 347.8 MGD of Biscayne Aquifer raw water withdrawal. Finished water base allocation of 340.8 MGD equates to 347.3 MGD of Biscayne Aquifer raw water withdrawal.
- d. WASD will be undertaking the 20-year water conservation plan and expects reductions in unaccounted for water (UFW). Water Conservation projections were taken from a Water Conservation Best Management Practices (BMP) Planning Spreadsheet prepared by Malcolm Pirnie, Inc. dated 1/23/2007. Values reflect projections as of 2/2/2007. Water conservation projections do not reflect water demand reductions presented by the "Unaccounted Water Loss Reduction Plan (February 2007)" prepared by Malcolm Pirnie, Inc. and currently under review by MDWASD.
- e. New Upper Floridan Aquifer RO WTP (10.0 mgd Phase I by 2011) see CIE Table 12, Project 20D; (5.0 MGD Phase II by 2018); (2.5 MGD Phase III by 2028).
- f. Floridan Aquifer Blending at Alexander Orr Water Treatment Plant/West and SW Wellfields (assuming 4% of Finished Water Demand) (7.4 mgd) by 2007 including ASR (wet season). See CIE Table 12, Project 20A. Hialeah/Preston Floridan Aquifer Blending Wellfield (or equal) (assumes 3% of Finished Water Demand) (4.8 mgd) by 2009. See CIE Table 12, Project 20C.
- g. Tentative Alternative Water Supply Reuse/Reclaimed Water Projects (exclusive of any BBCW rehydration AWS credits) by 2015 to replace existing finished water demand (gallon for gallon credit).
 - 1. North District WWTP Reuse Projects. This excludes the 5 mgd that will be used by the City of North Miami Beach. See CIE Table 8, Project 29 2.0 mgd +/-
 - 2. Central District WWTP Reuse Projects. See CIE Table 8, Project 30. 1.0 mgd +/-
 - 3. Coastal Wetlands Rehydration Demonstration Project by 2015. See CIE Table 8, Project 27. 1.0 mgd +/-

Total (est.) 4.0 mgd +/-
- h. South District Wastewater Treatment Plant (SDWWTP) Reuse Projects for groundwater recharge as shown in the table below. Exclusive of Coastal Wetland Rehydration AWS Credits.

Phase	Recharge Area	Applied (MGD)	AADD (MGD)	Implementation Year	CIE Table 8 Project Number
1	S. Miami Heights	23	18	2014	31
2	Alex-Orr	21	20	2020	32
3	Alex-Orr	16	15	2026	33
Total (est.)					53

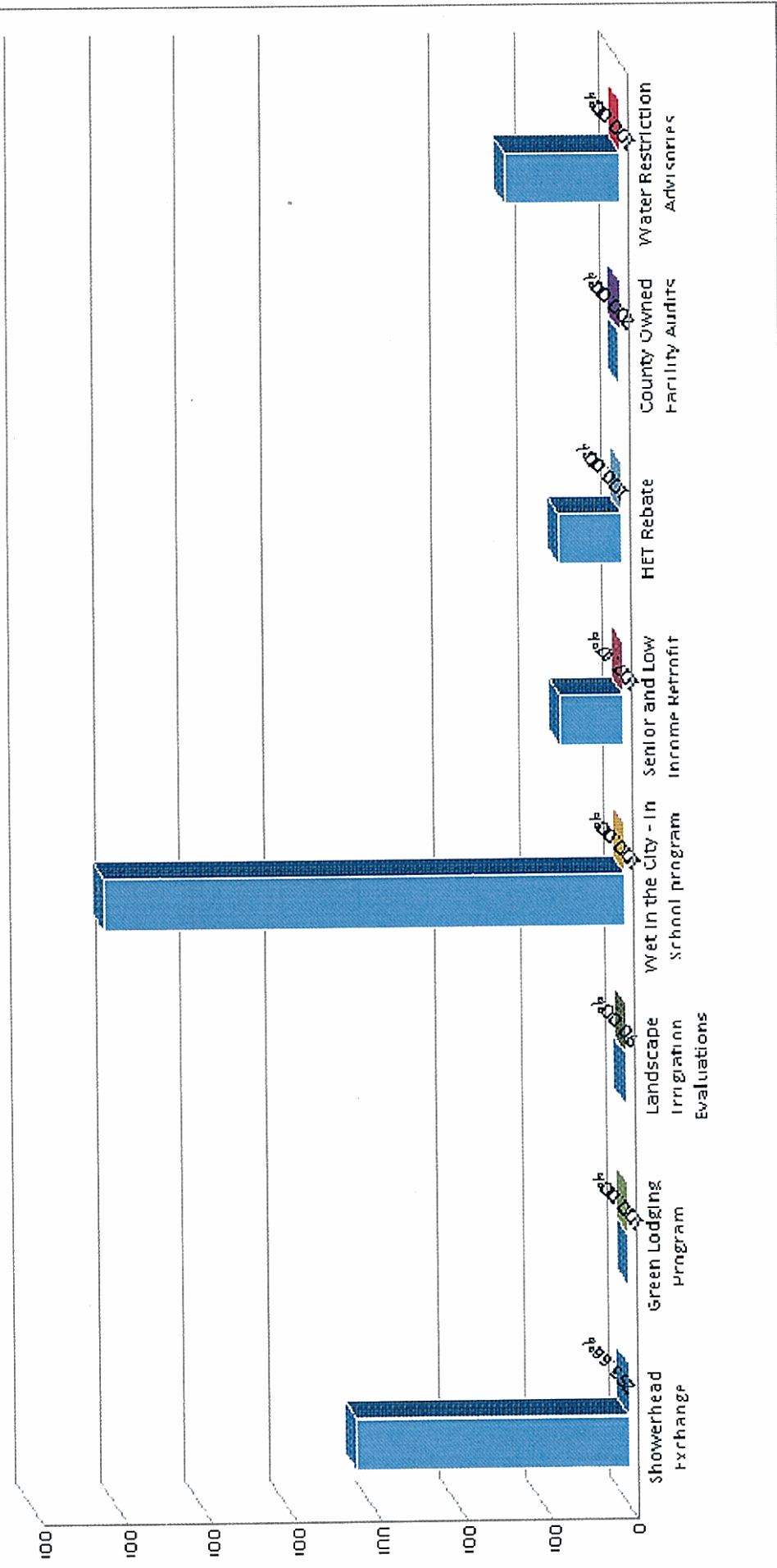
ATTACHMENT 4

**WATER CONSERVATION EVENTS
AND
WATER CONSERVATION OBJECTIVES AND PROGRESS**

WUEP Project	Total Numbers	Targets	% Complete
Senior and Low Income Retrofit	806 Retrofits	750 Retrofits	107.47%
HET Rebate	750 Rebates	750 Rebates	100.00%
County Owned Facility Audits	50 Facilities	25 Facilities	200.00%
Water Restriction Advisories	1362 Advisories	1362 Advisories	100.00%

WUEP Project	Total Numbers	Targets	% Complete
Showerhead Exchange	8117 Showerheads	3200	253.66%
Green Lodging Program	1 Hotel	1	100.00%
Landscape Irrigation Evaluations	9 Homeowners Assoc.	10	90.00%
Wet in the City - In School program	6134 Students	6134	100.00%

WUEP Projects Percentage of Targeted Goals Achieved



EVENTS		
<u>MONTH</u>	<u>EVENT</u>	<u>DATE</u>
<i>April</i>	Earthfest	04/22/07
<i>May</i>	Feria de La Mujer	05/05/07
	Adopt-a-Tree	05/12/07
<i>June</i>	District 8- Showerhead Distribution	06/18/07
	District 6- Showerhead Distribution	06/19/07
	Historical Museum- Water Stories Event	06/23/07
	Adopt-a-Tree	06/23/07
<i>July</i>	District 12- Green Lodging Event	07/17/07
	District 9- Showerhead Distribution	07/20/07
	Adopt-a-Tree	07/21/07
	City of Hialeah Showerhead Dist.	07/24/07
<i>August</i>	District 13- Showerhead Distribution	08/06/07
	Adopt-a-Tree	08/18/07
<i>September</i>	Adopt-a-Tree	09/15/07
	District 11-Dia de la Integracion Cultural	09/16/07
<i>October</i>	Adopt-a-Tree	10/13/07
<i>November</i>	Green Affordability Symposium	11/12-13/07
	Harvest Fest	11/17/07
<i>December</i>	District 4 - Showerhead Distribution	12/06/07

AWARDS

<i>FSAWWA Water Conservation Award for Excellence</i>		Orlando, FL
<i>Category Demand Management</i>		
<i>Show of Excellence</i>		HET Rebate Project
<i>Meritorious</i>		Senior Retrofit project
<i>Conserve Florida</i>	How to Develop a Water Conservation	Orlando, FL
<i>National Association of Counties (NACO)</i>		Richmond, VA
	Presentation & Panel Participation	
	Water Isn't Free: Managing Water Infrastructure and Supply Issues	

FEATURES

<u>SOURCE</u>	<u>ARTICLE/NEWSLETTER</u>	<u>DATE</u>
EPA	The WaterSense Current	Spring 2007
Miami Herald	H2Oh	07/10/07
EPA	The WaterSense Current	Summer 2007
CBS4	Miami-Dade Want Green Hotels	07/18/07
Miami Herald	Going Green has perks for business	07/22/07
Palmetto Bay	Moss Office Distributes showerheads	08/07/07
Miami Herald	Senor, gadgets save water	12/09/07
Miami Herald	Low-Flow Showerheads being distributed	12/09/07
Miami Herald	Conservationist go yard to yard	12/20/07
Historical Museum	Water Stories	06/23/07-01/20/08



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

July 3, 2008

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

Dear Mr. Eubanks:

**Subject: Miami-Dade County, DCA #08-1
SFWMD Comments on Adopted Comprehensive Plan Amendment Package**

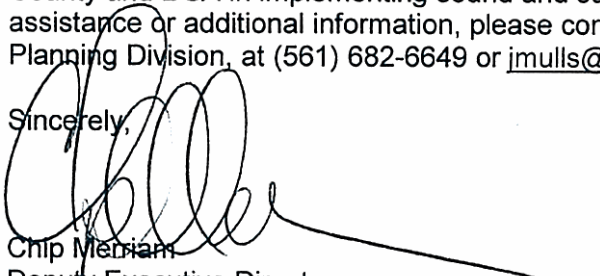
The South Florida Water Management District has completed its review of Miami-Dade County's adopted comprehensive plan amendment package, DCA #08-1, as requested by the Department of Community Affairs (DCA). We focused our review on the water supply issues, which were captured in Items #1 and #2 of the Department's Objections, Recommendations and Comments Report dated February 26, 2008.

We find that the County has sufficiently addressed the water supply planning issues as they relate to both the future land use map amendments (Item #1) and the Water Supply Facilities Work Plan (Item #2).

The adopted amendment package includes additional data and analysis that demonstrate that the County's ability to concurrently meet the demands of the proposed future land use amendment package. The County has also worked closely with the District in addressing the recommendations related to the Water Supply Facilities Work Plan.

We appreciate the County's attention to these matters and look forward to collaborating with the County and DCA in implementing sound and sustainable water resource solutions. For assistance or additional information, please contact John Mulliken, Director, Water Supply Planning Division, at (561) 682-6649 or jmulls@sfwmd.gov.

Sincerely,



Chip Merriam
Deputy Executive Director
Water Resources

c: George M. Burgess, County Manager, Miami-Dade County
Carolyn Dekle, Executive Director, SFRPC
Bob Dennis, Administrator, DCA
Sally Mann, DEP
John Mulliken, SFWMD



United States Department of the Interior
National Park Service



Biscayne National Park
9700 SW 328 Street
Homestead, FL 33033

Everglades National Park
40001 State Road 9336
Homestead, FL 33034

In Reply Refer to:

April 1, 2008

L3215

Miami-Dade County Department of Planning and Zoning
Attn: Interim Director Subrata Basu
111 NW 1st Street, Suite 1210
Miami, Florida 33128

Re: Parkland Development of Regional Impact

Dear Mr. Basu:

This letter is written regarding the proposed Parkland Development of Regional Impact (DRI). It is our understanding that the DRI application for this proposed project, located outside the County's Urban Development Boundary, has been found to be sufficient by the South Florida Regional Planning Council (RPC) and is currently being reviewed by your department relative to a land use plan amendment to the Comprehensive Development Master Plan (CDMP).

As you are aware, the CDMP sets forth policy elements for development as well as for the conservation of land and natural resources to guide decisions regarding future zoning and land use patterns in Miami-Dade County. Additionally, the South Miami-Dade Watershed Study and Plan, which was designed to meet objectives identified in the CDMP, recognized the South Miami-Dade watershed as one of the most critical watersheds in Florida due in part to its location between two nationally-recognized treasures, Everglades National Park and Biscayne National Park.

We would like to express our concern for potential impacts to both national parks from additional withdrawals of water (potable and non-potable) identified as necessary for this large (967 acres, 6941 residential units) development. Our review of the Parkland DRI application and two subsequent sufficiency responses to information needs requested by various government agencies indicates that the potable water demand projected for this proposed development is 1.871 MGD, without conservation measures, and 1.497 MGD with the application of a 20% conservation reduction. Non-potable water demand (irrigation) is estimated at 1.5 MGD. The potable water demand is proposed to be provided by the Miami-Dade County Water and Sewer Department (MDWASD), while the irrigation water would be provided in part by an on-site reuse facility as well as *additional* surface and/or ground water withdrawals (on-site wells and lakes).

We believe Miami-Dade County cannot meet the water supply demands of the proposed Parkland project as currently designed and be consistent with the 20-year Consumptive Water Use Permit (CUP) issued to the County by the South Florida Water Management District (District) in November 2007. The CUP was designed in part to prevent an increase in water withdrawals from Everglades water

bodies including Everglades National Park as well as to prevent the reduction in ground or surface water levels that results in harmful lateral movement of the fresh water/salt water interface. As noted in a recent Objections, Recommendations, and Comments (ORC) report prepared by the State of Florida Department of Community Affairs (DCA), dated February 26, 2008, proposed future land use changes that increase the potential demand for potable water in Miami-Dade County and which are located outside the County's established Urban Development Boundary (UDB) must be matched by an additional planned supply of water to be consistent with the CUP. Amendments to the CDMP and to the UDB for the Parkland project would require MDWASD to expand its service area to meet an increase in population and water demand from that which provided the basis of the CUP. Because the Parkland DRI does not identify a new water supply source for its potable water demand, we believe that adoption of these amendments is inconsistent with the CUP as well as with land use policy elements within the County's CDMP that provide important protective provisions (e.g., LU-3) for Everglades water bodies and Biscayne Bay.

Although the RPC has yet to issue its impact report, water supply concerns for the Parkland project have also been documented in a preliminary District impact assessment report, dated April 12, 2007, prepared for the RPC. The District's report indicated at that time that MDWASD does not currently have an adequate permitted allocation to meet the potable water demands for this project.

The applicant also states that existing groundwater withdrawals for agricultural irrigation on the property is estimated at 3.5 MGD and states that the 1.5 MGD non-potable demand for the project is less than half of that volume, thus concluding that project's estimated 1.497 MGD water demand will result in a "-2.111 MGD net change in water impacts on the South Florida area." However, as we understand the permitting process, the applicant does not have a legal right to the currently permitted 3.5 MGD groundwater withdrawal, but would be required to apply to the District for this use as a *new user* relative to potential impacts to Minimum Flows and Levels for water bodies including Everglades National Park and the Biscayne Aquifer, off-site wetlands, and other legal users. In addition, the District has indicated (letter to DCA, dated January 25, 2008) that additional ground water withdrawals from existing Biscayne Aquifer well fields beyond the CUP to meet the non-potable water demands are inconsistent with the Everglades protection provisions of the District's Regional Water Availability Rule.

Further, we question the applicant's statement that "it is unlikely that the 1.0 MGD withdrawal [to meet the non-potable water demand] would have any measurable impact on the ENP groundwater levels or seepage in the area, considering the Project is located approximately 1.5 miles east of L-31." Unless and until a valid modeling analysis is completed by the District and/or Miami-Dade County, we believe it is inappropriate to conclude that this withdrawal is unlikely to have an impact on ground water levels within or seepage rates from Everglades National Park.

For the above reasons, we believe that the currently proposed Parkland project is inconsistent with policies established by the CDMP, the CUP, and the regional water availability rule, and will create an additional strain on water supplies needed for both Everglades and Biscayne National Parks. Under the National Park Service Organic Act of 1916, it is our mission to conserve park resources and provide for visitor enjoyment in such manner as will leave these resources unimpaired for the enjoyment of future generations. As such, we ask that you carefully consider the comments provided above in evaluating the proposed Parkland DRI, particularly in terms of conserving the resources Everglades and Biscayne National Parks.

Sincerely,



Mark Lewis, Superintendent
Biscayne National Park



Dan B. Kimball, Superintendent
Everglades National Park

cc:

Rosa Davis, Miami-Dade County Department of Planning and Zoning
Jo Sesodia, South Florida Regional Planning Council
James Golden, South Florida Water Management District
NPS-SER: Paul Anderson, Acting Regional Director



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 10, 2008

Mr. D. Ray Eubanks
Plan Review and DRI Processing Team
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

RE: Miami-Dade County; Adopted CPA 08-1

Dear Mr. Eubanks:

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (Department) has reviewed Miami-Dade County's adopted comprehensive plan amendment under the provisions of Chapter 163, Part II, *Florida Statutes (F.S.)*, and Chapters 9J-5 and 9J-11, *Florida Administrative Code (F.A.C.)*. In accordance with those authorities, the Department provides the following comments to assist your agency in determining whether the adopted amendment complies with state law.

In its letter to the Department of Community Affairs (DCA) dated January 31, 2008, the Department provided comments and recommendations on the County's proposed comprehensive plan amendment package 08-1. As stated in that correspondence, the Department found that Applications 5, 8 & 9 of the amendment package did not contain sufficient data and analysis from which the Department could determine that adequate water supplies would be available to serve the properties that were the subjects of the three amendment applications.

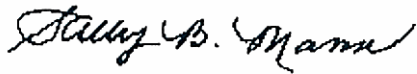
On April 24, 2008, the County adopted Applications 5 and 8, and on May 30, 2008, the County submitted to the Department the adopted amendment package with additional information. On July 3, 2008, the South Florida Water Management District issued its comment letter, stating that the amendment package included sufficient data and analysis to demonstrate the County's ability to concurrently meet the demands of the proposed future land use amendment package. The District also stated that Miami-Dade County had sufficiently addressed the water supply issues related to the future

Mr. D. Ray Eubanks
Miami-Dade 08-1 (Adopted)
July 10, 2008
Page 2 of 2

land use map amendments. Based upon those comments from the District – the water expert for South Florida – the Department submits no further comment with regard to water supply for the real property subject to Applications 5 and 8.

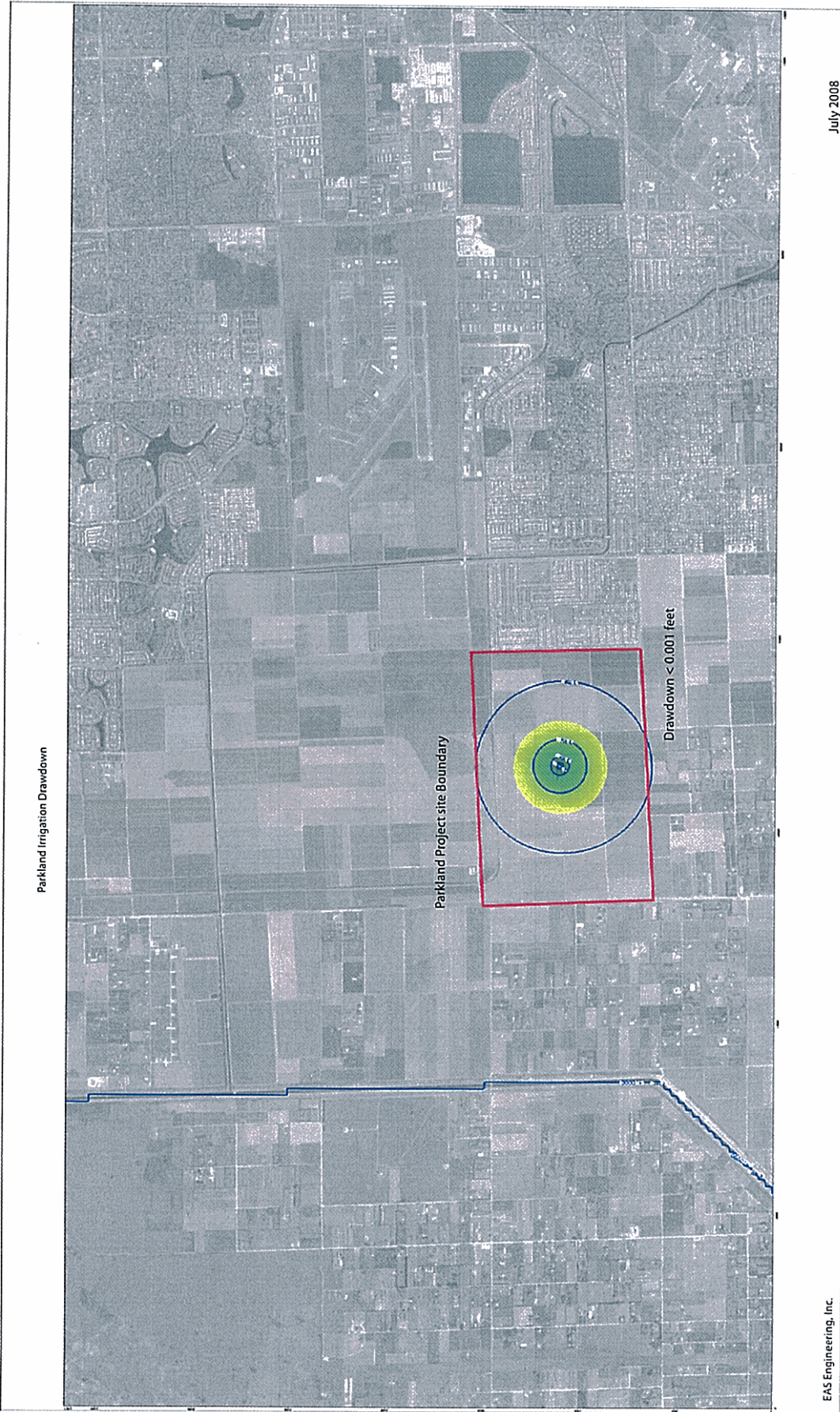
Thank you for the opportunity to comment on the proposed amendments. Should you require additional information, please do not hesitate to call or contact Mr. Chris Stahl at (850) 245-2169 or Chris.Stahl@Dep.State.Fl.US.

Yours sincerely,



Sally B. Mann, Director
Office of Intergovernmental Programs

SBM/jlq



Parkland Irrigation Drawdown

Parkland Project site Boundary

Drawdown < 0.001 feet

EAS Engineering, Inc.

July 2008

