

SOUTH FLORIDA REGIONAL PLANNING COUNCIL

Question 10, Part 2 B, Consistency with the SRPP

1. The response to the comments concerning Part 2 B, how the DRI is consistent with the *Strategic Regional Policy Plan for South Florida (SRPP)*, specifically with Goal 6 and Policies 6.2, 6.5, and 6.11, proposes a development order condition to address affordable housing. However, the proposed development order or the applicant's response does not address the following:
 - a. Why very low and low income housing will not be built within the DRI boundaries; until the issues related to the Question 24 and the housing supply inventory analysis are resolved, it is not clear that mitigation will not be required.
 - b. The methods to be utilized to monitor and to ensure long-term affordability for income-eligible homeowners and renters.
 - c. Why the building of affordable housing is to be coordinated with the DRI's residential development only and not with the DRI's commercial and retail development, which will generate new jobs and demand for housing.

Question 10, Part 2 B, Question 24, and/or the proposed development order should be revised to address the issues raised above. Until the issues above are resolved, it is not clear how the proposed DRI project is consistent with the SRPP and Goal 6 and Policies 6.2, 6.5, and 6.11.

Response: As presented in the previous response to SIN 2 comments, the Applicant is not required to provide affordable housing on- or off-site. Regardless, the Applicant has voluntarily elected to provide Workforce Housing on-site.

During the development order negotiation phase of the review process the Applicant is willing to discuss how this voluntary provision of Workforce Housing relates to comments 1.b. and 1.c., above.

In regard to Parkland 2014 (also known as "Parkland", "Project") consistency with the SRPP Policies 6.2, 6.5, and 6.11, the Applicant completed the DRI housing analysis (see Question 24 – Housing) based on the agreed upon methodology. This analysis shows:

- Parkland does not create an unmet need for affordable housing;
- Parkland does not create an undue cost burden for employees; and
- A sufficient supply of housing type and cost exists with the Parkland study area for very-low, low- and moderate income families.

Therefore, consistency with SRPP Policies 6.2, 6.5, and 6.11 is not applicable.

Question 17, Water Supply

2. **The Applicant has not provided sufficient information for Council staff to complete the required project review and draft development order conditions.**

In the response to the SIN2, the Applicant presents revised average daily potable water demand (1.497 MGD) and maximum daily potable water demand (3.369 MGD) numbers based on a 20% water conservation reduction rate. However, the Applicant does not provide additional documentation as to why this water reduction factor was selected and applied. In order for Council staff to conduct a review of and draft development order conditions that include these numbers, the Applicant needs to provide official correspondence from WASD indicating that it approves of the 20% water reduction figure. If WASD is amenable to this number, then the Applicant needs to submit a specific WASD-approved list of the household design features and fixtures that will be implemented to guarantee this level of water conservation.

The Applicant response to ADA Question 17F(2) is incomplete at this point in the review process. It is clear that additional water transmission lines and conveyance structures need to be constructed to enable WASD to serve the Parkland project during and after development, provided it is brought within the Urban Development Boundary. The Applicant needs to provide the design specifications and costs for these necessary infrastructure improvements, including water transmission lines to Council staff so that it can complete its project review.

Response:

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 680,000 to 850,000 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 Miami-Dade Water and Sewer Department (WASD) 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 WASD 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) For irrigation, provide all residential development with a cistern and/or other alternative (non-WASD) water supply sources. Where feasible, cisterns will also be used in other non-residential development; and
- (m) 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 1.487MGD 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.

WASD 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 would agree to 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.

Question17-F(2) has been revised to include design specifications, water main service layout and cost estimates for the necessary infrastructure improvements.

Question 18, Wastewater Management

3. The Applicant has not provided sufficient information for Council staff to complete the required project review and draft development order conditions.

In the response to the SIN2, the Applicant presents revised wastewater demand figures based on a 20% water conservation reduction rate. In order for Council staff to conduct a review of and draft development order conditions that include these numbers, the Applicant needs to provide additional documentation as to why this reduction factor was selected and applied. The Applicant also needs to provide official correspondence from WASD indicating that it approves of this figure.

The Applicant has not fully responded to ADA Question 18C(2) in its SIN2 response. It is clear that additional wastewater transmission lines and conveyance structures need to be constructed to enable WASD to process 75% of the wastewater flows from this project during and after development, provided it is brought within the Urban Development Boundary. The Applicant needs to provide the design specifications and costs for these necessary infrastructure improvements, including wastewater transmission lines and pump stations to Council staff so that it can complete its project review.

The Applicant has indicated that 25% of the project's wastewater will be processed on-site at a reuse facility. The Applicant needs to provide the following information to Council staff so that it can complete its project review:

- the design specifications, cost of construction and construction schedule for this facility; and
- the projected operation and maintenance costs for this facility and indicate who will be the entity responsible for operating this facility into the future.

To fulfill the requirements of ADA Question 18C(1), enable project review and the drafting of development order conditions, the Applicant needs to provide documentation that indicates that adequate excess capacity currently exists in WASD's wastewater system to serve this development, if brought within the UDB.

Response: As a result of the water conservation measures described in the response to SFRPC comment #2, above, Parkland's wastewater treatment demand would be reduced by 30 percent for residential uses and 25 percent for non-residential uses, from 1.871 MGD to 1.319 MGD. This resulting 1.319 MGD of wastewater treatment demand would be further reduced by a conservative 40 percent to account for reduced water demand as a result of Parkland's alternative water sources for residential irrigation. See revised response to Question 17 G. Accounting for this 40 percent reduction reduces Parkland potable water/wastewater demand to 0.844 MGD. Of this resulting 0.844 MGD, 25 percent (0.211 MGD) will be recaptured for treatment and irrigation of areas within public rights of way. Thus, 0.633 MGD of sewage flow would return to the WASD system, while 0.211 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 WASD as part of their regional facility, thereby providing WASD 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 WASD.

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

Finally, the issuance of all building permits shall be conditioned upon the availability of allocations of wastewater treatment plant capacity.

Question 22- Air Quality

4. The following statement is applicable to Question 22 B through E:

Once Question 21 –Transportation- has been found sufficient by the SFRPC, an air quality analysis should be performed in accordance with the June 1994 Florida Department of Environmental Protection's "Guidelines for Evaluating the Air Quality Impacts from Indirect Sources", and in coordination with reviewing agencies.

Response: The Applicant will be initiating the Air Quality Analysis pursuant to Question 22B through 22E as soon as FDOT confirms that the intersection analyses are sufficient as included in Revised Question 21 (dated September 2008) and Revised Appendix 21-7 (dated September 2008).

Question 24, Housing

5. The key assumptions used in the calculations for the housing costs are not adequate for the reasons stated below. Until the issues below are resolved, the housing supply analysis is incomplete and it cannot be determined to be adequate. It is also not clear if affordable housing mitigation will be required.

a. The only source of information submitted by the applicant for insurance information and costs is anecdotal information from a newspaper article. The information is not appropriate or applicable to the housing cost analysis and cannot be verified. The insurance rate of \$15 per 1,000 of value included on page 24-8, Tables 24-B.6 and 24-B.7 and Appendix 24-B.4 has been utilized for at least the last five years. For example, this rate was utilized in the Application For Development Agreement for the Beacon Lakes DRI in 2001. However, insurance rates have been steadily rising in Florida, and South Florida in particular, for the last several years. The

insurance rate information to be provided must be sufficient to determine if it is current and must be able to be verified; i.e., sources of information must be provided. Information was supplied to the applicant's housing consultant on March 5, 2007 on potential sources of information for insurance rates. This information includes surveying SHIP and other Affordable Housing providers in the region to see what they are allowing for their housing programs. The affordable housing supply analysis should be revised where appropriate to reflect the insurance cost information.

Response: Question 24.B has been revised utilizing data from www.shopandcomparerates.com; a State of Florida sponsored website. See revised response.

- b. **Because smaller housing units tend to be less expansive, it is possible that the housing supply inventory will contain disproportionate number of smaller housing units, such as efficiency and 1-bedroom units. It is not clear in the housing supply analysis how the maximum caps have been applied to available efficiency and 1-bedroom for sale housing units or why only rental units were considered in the analysis of the housing supply inventory. For example, the analysis does not provide information on how many total efficiency and 1 bedroom units were found in the housing supply for rental and owner-occupied units and how many have been included in the housing supply analysis based on the maximum caps for the these types of units. In order to ascertain that the housing available within the supply area is adequate to meet the needs of households of various sizes, this information must be supplied. Please clarify and revise the affordable housing analysis where appropriate to reflect the revised data.**

Response: Question 24.B has been revised to provide the requested information.