SOUTH FLORIDA REGIONAL PLANNING COUNCIL

Question 10, Development Program

1. **Revised Table 11-3, Schedule of Development, indicates that 2,346 single-family attached dwelling units will be built. However, this is not consistent with Table 24-A.1, which states that 2,436 single-family attached dwelling units will be built. Please revise the ADA to be consistent with the number of single-family attached dwelling units to be built.**

   The correct number is 2,436 single-family attached units and the necessary changes have been made to the materials in Question 11.

2. **Question 10, Part 2 B., Consistency with SRPP, The response to the comments concerning Part 2B, 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 does not address the following:**

   a. **Why very low and low income housing will not be built within the DRI boundaries;**
   b. **How long the 'workforce" or "moderate" income housing units projected to be built will maintain housing affordability;**
   c. **The methods to be utilized to monitor and to ensure long-term affordability for income-eligible homeowners and renters;**
   d. **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; and**
   e. **The schedule for the building of affordable housing units.**

   Part 2B and/or the proposed development order should be revised to address these issues. Until the issues 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 to item "a." – Pursuant to section 9J-2.048, FAC, the Applicant's response to Question 24 – Housing shows that the proposed project does not create an unmet need for very low or low income housing. Since mitigation is not required, low and very low income housing is not proposed within the DRI boundaries.

   Response to item "b." - The length of time the proposed affordable workforce housing units will maintain affordability will be consistent with section 380.0651(3)(j), Florida Statutes.

   Response to items "c." and "d." - The Applicant will be prepared to discuss these items during the development order negotiation phase of the review process.

   Response to item "e.", - The schedule for building the affordable workforce housing units is contained on page 6 of the SFRPC section in the Applicant's Response to the First Statement of Information Needed, dated October 2006.

Question 14, Water

3. **The Applicant needs to provide a description of the existing surface and ground water quality on the site. The Applicant also needs to provide a table describing the**

compounds tested for in the onsite water samples and at the BL 12 monitoring station- This table should compare these compound levels to the officially accepted levels/concentrations used for the purposes of this review.

Groundwater samples from two on-site wells were collected on February 15, 2007. The samples were analyzed for priority pollutant volatiles, organochlorine pesticides, polychlorinated biphenyls, metals and wet chemistry. The results of the analyses are attached. The table below summarizes the parameters with detectable concentrations. All other parameters were below the detection limits for those parameters.

East Well

Parameter	Result (mg/l)	MDL (mg/l)	State Std*	DERMStd**	CDMP†
Cyanide	0.021	0.0026	0.2	None Detectable	N/A
Nitrogen, Ammonia (as N)	0.082	0.0040	N/A	0.5	1.5#
Nitrogen, Kjeldahl	0.41	0.091	N/A	N/A	N/A
Nitrogen, Nitrate (as N)	3.3	0.062	10 (as N)	N/A	0.68●
Nitrogen, Nitrite (as N) (I)	0.29	0.021	N/A	N/A	N/A
Nitrogen, Organic	0.33	0.091	N/A	N/A	N/A
Orthophosphate (I)	0.0090	0.0080	N/A	N/A	0.33○
Phosphorus, Total	0.059	0.018	N/A	N/A	0.33○

West Well

Parameter	Result(mg/l)	MDL (mg/l)	StateStd*	DERMStd**	CDMP†
Nickel (I)	0.0020	0.0016	0.1	N/A	N/A
Thallium (I)	0.0048	0.0047	0.002	N/A	N/A
Cyanide	0.018	0.0040	0.2	None Detectable	N/A
Nitrogen, Kjeldahl	0.39	0.091	N/A	N/A	N/A
Nitrogen, Nitrate (as N)	4.0	0.062	10 (as N)	N/A	0.68●
Nitrogen, Nitrite (as N) (I)	0.30	0.021	N/A	N/A	N/A
Nitrogen, Organic	0.39	0.091	N/A	N/A	N/A
Orthophosphate (as P)	0.030	0.016	N/A	N/A	0.33○

* Drinking Water Standards, 62-550, F.A.C., maximum contaminant levels (mg/l)
** Groundwater Quality Standards for Dade County, 24-11(4) of county code (mg/l)
† Target Criteria established in Policy 5A(2), Section IV of CDMP, Policy 5A.2.
○ Total Phosphate (TPO4)
Total Ammonia-Nitrogen and Organic Ammonia
● Total Nitrate (NOx-N)
(I) Reported value is between the method detection limit (MDL) and the reporting limit

Only two parameters exceeded any existing State or DERM standards: cyanide and nitrate nitrogen. DERM's standard for cyanide (none detectable) is very strict. The measured cyanide values are well below the State standard. There are no State or DERM standards for nutrients such as nitrate nitrogen. The only standard for nitrate nitrogen is that contained in the CDMP (again, DERM does not have a nitrate nitrogen standard). Both wells exceeded this standard for total nitrate nitrogen.

4. On page 6 of the Applicant's response to the SFRPC staff's questions, the Applicant states that site-specific water quality data have been requested and will be forthcoming, citing an attached letter to the SFWMD. However, this letter was not included in the Response to the First Statement of Information Needed.

The applicant did not ask the SFWMD for water quality data. This question is therefore not applicable. The applicant did request a jurisdictional determination from the SFWMD. The attached letter from the District verifies that there are no wetlands on the project site.

Question 15, Soils

5. **The Applicant needs to specify whether the project will generate any overburden or spoil because of grading and fill activities. If so, the Applicant should indicate how this material will be disposed of.**

   It is anticipated that the site will not have any excess spoil or excess fill to dispose of. In the event that there is excess material, it is anticipated that it will be disposed on site in landscape areas and berms.

Question 17, Water Supply

6. **Question 17 F - If the Applicant anticipates using an off-site water supply, then the Applicant must provide a letter from an off-site water supplier outlining:**
   - **a) The projected excess capacities of the water supply facilities to which connection will be made at present and for each phase through completion of the project;**
   - **b) Any other commitments that have been made for this excess capacity; and,**
   - **c) A statement of the agency or firm's ability to provide services at all times during and after development.**

   If service cannot be provided at all times during and after development Question 17 (F) also requires that the Applicant: "identify the required capital improvements, timing, cost and proposed responsible entity for each phase in which service is unavailable."

   In light of these specific ADA requirements and the ongoing water supply policy dialogue in Miami-Dade County relating to the coordination of proposed land use changes and the provision of potable water supplies, the Applicant should actively work with WASD and the South Florida Water Management District to assemble a comprehensive analysis to demonstrate whether adequate potable water supply and water supply facilities exist or can be provided for by Miami-Dade County, under the new water supply planning regulations (per Senate Bill 444 and Senate Bill 360). Otherwise, the Applicant should indicate how the necessary water supply and facilities will be provided to serve the Parkland site.

   Coordination is necessary to determine how water will be supplied to this project and to determine if off- site water supply is feasible.

   The applicant met with Miami-Dade County Water and Sewer Department and Planning Department staffs on January 12, 2007. Representatives of the Regional Planning Council also attended that meeting, at which the county's regional water supply plans were discussed. It was agreed that the county uses population projections to guide their water supply planning. How that population is distributed is irrelevant; only the total number of people is critical for planning purposes.

   Miami Dade County is currently pursuing the renewal of the County's consumptive use permit for its entire regional water system, and is simultaneously proposing to amend its 5-year schedule of Capital Improvements in the Capital Improvements Element as well as its 10-year water supply facilities work plan. See attached Appendix I, showing projected 20-year water

supply sources, and Appendix II, showing proposed amendments to Capital Improvements Element. When the consumptive use permit is issued, and the amendments to the Capital Improvements Element and the Water Supply Plan are adopted, an adequate water supply for this project will be available.

In addition, it was explained that all of the county's water treatment plants are interconnected, so that no single plant will be responsible for providing water for this project.
However, Alex Orr is currently the primary source of water for this area, using water from the Biscayne Aquifer, and there are plans to supplant the plant's water source with blended water from the Florida Aquifer in the future.

The Applicant should provide the details of all on-site and off-site non-potable, potable or irrigation water supplies should be presented in the Potable/Non-Potable Water Supply Table format specified under Question 17 in the ADA.

The Potable/ Non-Potable Water Supply Tables in Revised Question 17 have been updated to reflect the agency's comments.

TABLE 17-1
POTABLE/NON-POTABLE WATER DEMAND[1]

Land Use	Number of Units	Water Use (GPD/Unit)	Potable Water Demand (MGD)(*)	Potable Water Demand (with 20% conservation reduction) (MGD)(*)	Non-Potable Water Demand (Irrigation)		Maximum Water Demand (MGD)
					25% Waste Water Recapture (MGD)(*)	On-site Lakes	
Single Family, detached	1,257 du	350 gpd/unit	0.440	0.352	0.088	-	0.792
Single Family, attached	2,436 du	250 gpd/unit	0.609	0.487	0.122	-	1.096
Multi-Family	3,248 du	200 gpd/unit	0.650	0.520	0.130	-	1.170
Retail	200,000 sf	5/100 gpd/sf	0.010	0.008	0.002	-	0.018
Office	100,000 sf	10/100 gpd/sf	0.010	0.008	0.002	-	0.018
Industrial – Flex Space	550,000 sf	20/1000 gpd/sf	0.011	0.009	0.002	-	0.020
School							
K-8	3,200 stud.	15 gpd/stud	0.048	0.038	0.010	-	0.086
High School	1,600 stud.	20 gpd/stud.	0.032	0.026	0.007	-	0.059
Staff	360	15 gpd/person	0.005	0.004	0.001	-	0.009
Hospital	200 beds	250 gpd/bed	0.050	0.040	0.010	-	0.090
Community Uses	50,000 sf	10/100 gpd/sf	0.005	0.004	0.001	-	0.009
Parks	67 acres	5 gpd/person	0.001	0.001	0.000	-	0.002
Total			1.871 MGD	1.497 MGD	.375 MGD	1.125 MGD	3.369 MGD

Source: Ford Armenteros

(*) MGD= Millions of Gallons per Day

The Average Daily Demand (A.D.D.) is 1.497 MGD
The Maximum Daily Demand (225% of A.D.D.) is 3.369 MGD
The Peak Hour Demand (450% of A.D.D.) is 0.281 MGH

[1] Current agricultural water demand on the Project site is of 3.608 MGD of non-potable ground water. The 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.

TABLE 17-2
POTABLE/NON-POTABLE WATER SUPPLY

Phase	On-Site Supply*				Off-Site Supply
	Groundwater	Surface Water	Other	Total	
Phase 1					
Potable					1.497 MGD (WASD)
Non-Potable					
Irrigation	-	1.125 MGD	0.375 MGD	1.500 MGD	None

Source: Ford Armenteros

Question 18, Wastewater Management

7. The Applicant needs to present wastewater data in accordance with the format of the summary table included in Question 18 of the ADA. This table requires that the Applicant present all projected wastewater generation and identify all anticipated wastewater treatment (both onsite and offsite) by project phase. Currently Table 18-1 on page 18-1(R), only shows projected wastewater flows.

The Wastewater Management Table in Revised Question 18 has been updated to reflect the agency's comments.

TABLE 18-1
WASTEWATER FLOWS

Land Use	Number of Units	Sewage Loading (GPD/Unit)	Sewage Flows (MGD)(*)	Sewage Flows (with 20% conservation reduction) (MGD)(*)	Sewage Flows (after 25% water recapture for irrigation) (MGD)(*)	Peak Sewage Flows (MGD)
Single Family, detached	1,257 du	350 gpd/unit	0.440	0.352	0.264	1.210
Single Family, attached	2,436 du	250 gpd/unit	0.609	0.487	0.365	1.675
Multi-Family	3,248 du	200 gpd/unit	0.650	0.520	0.390	1.788
Retail	200,000 sf	5/100 gpd/sf	0.010	0.008	0.006	0.028
Office	100,000 sf	10/100 gpd/sf	0.010	0.008	0.006	0.028
Industrial – Flex Space	550,000 sf	20/1000 gpd/sf	0.011	0.009	0.007	0.030
School						
K-8	3,200stud.	15 gpd/stud	0.048	0.038	0.028	0.132
High School	1,600 stud.	20 gpd/stud.	0.032	0.026	0.019	0.088
Staff	360	15 gpd/person	0.005	0.004	0.003	0.014
Hospital	200 beds	250 gpd/bed	0.050	0.040	0.030	0.138
Community Uses	50,000 sf	10/100 gpd/sf	0.005	0.004	0.003	0.014
Parks	46 acres	5 gpd/person	0.001	0.001	0.001	0.003
Total			1.871 MGD	1.497 MGD	1.122 MGD	3.086 MGD

Source: Ford Armenteros, Inc.

(*) MGD= Millions of Gallons per Day

The Average Daily Flow (A.D.D.) is 1.122 MGD
The Peak Sewage Flow (275% of A.D.D.) is 3.086 MGD

Rates were obtained from Miami-Dade County sewage flows used by the Miami-Dade County Water and Sewer Department (Miami-Dade County Code Section 24-43 (5) Sewage Loading).

75% of the wastewater flow (1.122 MGD) will discharge into the WASD sewer system and 25% (0.375 MGD) will be treated in a satellite facility and recycled to meet a portion of the project's irrigation demand.

The Applicant should coordinate with WASD, the South Florida Water Management District, FDEP and the U.S. EPA prepare a complete analysis that demonstrates that adequate wastewater facilities exist or can be provided for by Miami-Dade County. Otherwise, the Applicant should indicate how the necessary wastewater facilities will be provided to serve the Parkland site.

The applicant met with Miami-Dade County Water and Sewer Department and Planning Department staffs on January 12, 2007. Representatives of the Regional Planning Council also attended that meeting, at which the county's regional water supply plans were discussed. It was agreed that the county uses population projections to guide their water supply planning. How that population is distributed is irrelevant; only the total number of people is critical for planning purposes.

Miami Dade County is currently pursuing the renewal of the County's consumptive use permit for its entire regional water system, and is simultaneously proposing to amend its 5-year schedule of Capital Improvements in the Capital Improvements Element as well as its 10-year water supply facilities work plan. See attached Appendix I, showing projected 20-year water supply sources, and Appendix II, showing proposed amendments to Capital Improvements Element. When the consumptive use permit is issued, and the amendments to the Capital Improvements Element and the Water Supply Plan are adopted, an adequate water supply for this project will be available.

The wastewater treatment plant that will most likely receive the wastewater generated by this project is the South Dade Plant. However, since WASD's treatment plant's are interconnected, it does not exclude the possibility of the wastewater being routed to other plants within the WASD system.

Question 21, Transportation

8. In Table 21.B2, 3 educational facilities are listed, a high school and two middle schools. Combined, these three facilities will have a capacity of 4,800 students. In Section C.1 Internal Trip Analysis, it is explained that of the 4,800 students in the proposed DRI, 2,871 students are attributable to this development will derive 2,038 internal trips. Please explain the other external trips that will be derived from the 1,929 students that are outside of this DRI.

The trip generation analysis in Table 21.B2 of the ADA includes the net external trip impact of the three educational facilities proposed in the DRI, even though the DRI residents will only consume 2,871 student stations (59.8%) out of the 4,800 student stations created by the two proposed K-8 schools (3,200 student stations) and the proposed high school (1,600 student stations). The anticipated DRI school demand of 2,871 students includes 2,038 elementary and middle school students and 833 high school students. The three schools collectively would then accommodate 1,929 students from neighborhoods located outside the DRI boundaries and thus

the net external PM peak hour trips for these students are included in the DRI analysis and are assigned to the external roadway network as part of the trip impact for the three school sites. For further clarification, Table 21.C4 from the ADA identifies the following breakdown of the PM peak hour school related trips:

- 704 Gross PM Peak Hour school trips are calculated using ITE rates for the two K-8 schools and the high school;
- 370 PM Peak Hour school trips are calculated by the ITE internalization matrix to be internal to the DRI for those school trips made by DRI residents; and
- 334 Net External PM Peak Hour school trips are assigned to the external roadway network to accommodate those school trips made by students or employees living outside the DRI boundary.

The Applicant states that the community adjacent to Parkland is presently serviced by Metro-Dade Transit's Coral Reef Max bus route. Although amenities such as waiting areas (shelters) are mentioned as strategies under the Transit Demand Management section, the Applicant should indicate whether the master plan will include community busing strategies and ancillary amenities, such as designated bus-waiting areas and child care facilities to support the DRI and future Commuter Rail Service.

The Parkland DRI will include community busing strategies and ancillary amenities to support the DRI, the demand for alternative travel modes and the potential for future Commuter Rail Service to serve the DRI site and/or study area. The site specific ancillary and transit amenities will be addressed with Miami-Dade Transit as part of the DIC review process that will locate specific amenities on site after the project reaches sufficiency.

Question 22- Air Quality

9. 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.

The Applicant will initiate the Air Quality Analysis once Transportation – Question 21 has been found sufficient by the SFRPC. The Applicant will schedule a meeting with DEP and DERM to determine the air quality modeling methodology for intersections and parking facilities as applicable pursuant to DEP's "*Guidelines for Evaluating the Air Quality Impacts of Indirect Sources*".

Question 24, Housing

10. The key assumptions used in the calculations for the housing costs are not adequate because the insurance costs 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. Please update the insurance rate and provide the source of the

insurance rate. The rate must be able to be verified. Please revise the affordable housing analysis where appropriate to reflect the revised data.

The SFRPC has rejected any source we have suggested for establishing an appropriate rate to use in the analysis. They have agreed to find an acceptable verifiable source.

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. Please clarify and revise the affordable housing analysis where appropriate to reflect the revised data.

The Methodology requires that units with 2 bedrooms or more constitute 46.3 percent or more of available supply while 1-bedroom units not exceed 29 percent of supply. As shown in the revised response to Question 24, the distribution of units within the available supply is as follows:

- 1-bedroom units constitute 25.8 percent of the 124 very low income for-sale unit supply while units with 2 bedrooms or more constitute 74.2 percent.

- 1-bedroom units constitute 22.6 percent of the 309 low income for-sale supply while units with 2 bedrooms or more constitute 77.4 percent.

- 1-bedroom units constitute 28.8 percent of 2,391 moderate income for-sale supply while units with 2 bedrooms or more constitute 71.2 percent.

Based on the percentages shown above, all of the units transacted during the past 12 months (Appendix 24-B.7) represent available supply.