

ADVOCACY BRIEF AND IMPACT ANALYSIS

Opposition to Proposed Rezoning Application Z2025000020

CITINET AVENTURA LLC AND REDLAND GROVE LLC

138-Unit Residential Development

SW 220th-226th Street between SW 132nd Court and SW 133rd Court

Hearing Date: November 20, 2025

EXECUTIVE SUMMARY

This advocacy brief analyzes the proposed rezoning of approximately 20.91 acres from AU (Agricultural, minimum 5-acre lots) to PAD (Planned Area Development) to accommodate 138 residential units at a density of **6.9 units per acre**.

Context: The property is adjacent to an established suburban residential neighborhood developed at approximately **3 units per acre** (typical 1/3 acre lots with single-family homes). The proposed development would introduce density **more than double** that of the existing surrounding community.

Key Concerns:

- **Excessive density incompatible with established neighborhood** - Proposed 6.9 units/acre vs. existing ≈3 units/acre
- **Five major variance requests that eliminate fundamental zoning protections**
- **Critical parking deficiency** - 30 units with ZERO parking spaces will overflow onto neighborhood streets
- **Significant traffic increase** - 1,380 daily trips on infrastructure designed for current suburban density
- **Emergency access and safety concerns** - Single access point via private drives with no public street frontage
- **Precedent for over-dense development** throughout the area

1. COMPATIBILITY WITH EXISTING NEIGHBORHOOD CHARACTER

1.1 Current Neighborhood Context

The surrounding residential community consists of:

- Single-family homes on approximately **1/3 acre lots** (typical 14,500 sq ft)
- Homes ranging from 2,000-3,000 square feet
- **Existing density: approximately 3 units per acre**
- Two-car garages with paved driveways
- Established tree canopy and landscaping
- Family-oriented neighborhood with children
- Quiet residential streets with minimal through-traffic

1.2 Proposed Development Density

The application proposes:

- **138 units on 20.91 acres = 6.9 units per acre**
- **More than double (230%) the density of surrounding neighborhood**
- Elimination of standard parking for 22% of units
- Access solely via private drives with no public street frontage

1.3 Density Incompatibility Analysis

Metric	Existing Neighborhood	Proposed Development
Density	≈3 units/acre	6.9 units/acre (+130%)
Lot Size	≈14,500 sq ft (1/3 acre)	≈6,300 sq ft (-56%)
Parking Standard	2 spaces/unit (garages/driveways)	30 units with 0 spaces (-100%)
Street Access	All homes front public streets	0 feet public frontage (Eliminated)

The proposed density represents a fundamental incompatibility with the established residential pattern. While the adjacent AU-zoned parcel could theoretically support large-lot development, the practical reality is that it borders an existing suburban neighborhood. Any development should serve as a compatible transition that respects the established community character.

Reasonable Alternative: Development at **2-4 units per acre (40-80 units)** would maintain compatibility with existing neighborhood density, require fewer or no variances, minimize traffic and parking impacts, and preserve property values and quality of life for existing residents.

2. EXCESSIVE VARIANCE REQUESTS

The application requests **five major variances** that collectively eliminate fundamental zoning protections.

2.1 Frontage Variance

Standard Required: Residential lots must have frontage on public streets

Variance Requested: Waive requirement entirely - **0 feet of public street frontage**

Impact:

- All 138 units accessed solely through private drives
- **Single point of failure** for all vehicular and emergency access
- Fire trucks and ambulances must navigate private internal roads
- No public street maintenance or snow removal obligations
- If private access fails or is blocked, entire development is inaccessible

2.2 Parking Variance

Standard Required: 2 parking spaces per single-family dwelling unit

Total required: 138 units \times 2 spaces = **276 spaces**

Variance Requested:

- Permit **30 units (22% of total) with ZERO parking spaces**
- Eliminates **60 required parking spaces**

Impact on Existing Neighborhood:

According to U.S. Census data, American households average **1.88 vehicles per household**. For 138 units:

- Expected vehicles: $138 \times 1.88 = \text{approximately 260 vehicles}$
- With variance: Maximum 216 spaces + 0 spaces for 30 units = **216 spaces**
- **Deficit: 44+ vehicles with no designated parking**

Where will these vehicles park? Overflow onto **surrounding neighborhood streets**, block driveways and mailboxes, reduce street visibility creating safety hazards, congest already-limited street parking, and create conflicts with existing residents.

The parking variance guarantees negative impacts on existing residents who properly provide parking for their households.

3. TRAFFIC AND INFRASTRUCTURE IMPACT

3.1 Trip Generation Analysis

Based on Institute of Transportation Engineers (ITE) Trip Generation Manual, single-family residential developments generate:

Period	New Trips Generated
Weekday AM Peak	102 trips (138×0.74)
Weekday PM Peak	138 trips (138×1.0)
Daily Total	1,380 trips (138×10)

A child's life is worth more than a developer's profit margin. The traffic increase poses a direct threat to child safety in our neighborhood.

4. CONCLUSIONS AND RECOMMENDATIONS

4.1 Summary of Fatal Flaws

This application suffers from multiple fatal flaws:

Compatibility Failure

- Proposes 6.9 units/acre adjacent to established 3 units/acre neighborhood
- More than double existing density

Infrastructure Inadequacy

- Adds 1,400+ daily trips to local residential streets
- Streets lack capacity for this traffic increase
- Single access point creates emergency response risks

Parking Crisis

- Eliminates 60 required parking spaces
- Guarantees overflow onto neighborhood streets

Excessive Variances

- Five major variances eliminate fundamental protections
- No public street frontage for 138 units
- Fails variance standards (minimum necessary, no hardship)

4.2 Recommendation to Board of County Commissioners

We respectfully urge DENIAL of Rezoning Application Z2025000020.

The application fails to meet legal standards for approval:

- **Not compatible** with surrounding residential development
- **Inadequate infrastructure** to serve proposed density
- **Variances not justified** - fail minimum necessary test
- **Detrimental to public welfare** - traffic, safety, parking impacts
- **Sets dangerous precedent** for over-dense development

4.3 Alternative Recommendation

If the Board determines some development is appropriate, it should be:

- **Density: 2-4 units per acre (40-80 units maximum)**
- **Full parking compliance:** 2 spaces per unit, no variances
- **Public street frontage:** No access-only-via-private-roads
- **Standard open space:** No reductions below code minimums

A development at compatible density would respect established neighborhood character, minimize impacts on existing residents, meet legal standards for approval, and still provide profitable project for developer.

The developer's desire for maximum profit does not outweigh the rights of existing residents to maintain their quality of life and property values.

Respectfully submitted,

Jason Schoch

13216 SW 226th Street, Miami, FL 33170

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On behalf of concerned residents of Southern Estates.