

September 30, 2021

**VIA ELECTRONIC DELIVERY & HAND DELIVERY**

Mr. Ramon Trias  
Planning and Zoning Director  
City of Coral Gables  
427 Biltmore Way, 2nd Floor  
Coral Gables, Florida 33134

**Re: 100 Miracle / Statement of Use for Transfer of Development Rights Planning and Zoning Application / Property located at 100 Miracle Mile, 151 Andalusia Ave & 2414 Galiano Street, Coral Gables, Florida; Folio Nos. 03-4117-005-0570/0580/0590/0600/0630/06640 (the “Property” or “Receiving Property”)**

Dear Mr. Trias:

On behalf of Poncecat Miracle Mile, LLC (the “**Applicant**”), please accept this correspondence in connection with the approval of the above-referenced Property as a “Receiving Site” for the Transfer of Development Rights (**TDRs**) pursuant to the City of Coral Gables Zoning Code (the “**Zoning Code**”)<sup>1</sup>. As discussed further below, the Applicant requests the approval of approximately 23,597 square feet of TDRs for the development of the mixed-use project previously approved at the Receiving Property in accordance with the Zoning Code (the “**TDR Application**”). Approval of the TDR Application will permit the use of said TDRs for the development of the Property with a pedestrian friendly, mixed use development as previously approved by the City of Coral Gables Commission (the “**City Commission**”).

**TRANSFER OF DEVELOPMENT RIGHTS APPROVAL HISTORY**

On March 26, 2019, the City Commission approved the development of the Property with a 14-story mixed use project consisting of 13,000 square feet of ground floor retail and 130 upper level residential units pursuant to Resolution 2019-86 (the “**2019 Resolution**”) (the “**Approved Project or Project**”). As reflected in the approved site plan entitled “100 Miracle Mile” and prepared by Behar Font & Partners (the “**Site Plan**”), the Project consists of two buildings – a new 14-story residential building along Andalusia Avenue and the remodeling of the existing 3-story building fronting Miracle Mile – connected by pedestrian bridges that transect the Alley. The Approved Project contains approximately 117,320 square feet of total floor area, of which 23,596.8 square feet was included for the use of TDRs at the Receiving Property.

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<sup>1</sup> Please note, the Zoning Code sections referenced herein are based on the 2019 Zoning Code rather than the updated Zoning Code adopted on February 9, 2021, as discussed further below.

100 Miracle Mile  
Transfer of Development Rights (Receiving Site)

In furtherance of the development approvals needed for the Approved Project, the Historic Preservation Board (the “**HPB**”) approved the issuance of Certificates of Transfer totaling 23,597 square feet from two (2) historically designated properties in accordance with Section 3-1004 of the Zoning Code. A copy of the Certificates of Transfer from each sending site is enclosed for your convenience. Subsequently, on November 12, 2020, the City’s Planning and Zoning Board (the “**PZB**”) recommended approval of the TDR Application.

Please note, on February 9, 2021, the City adopted a new Zoning Code pursuant to Ordinance 2021-07, as well as subsequent legislation under Ordinance 2021-13 that provided for specific development regulations affecting the Miracle Mile corridor (collectively, the “**Updated Zoning Code**”). In accordance with the City Attorney’s Office, the Approved Project remains vested under the previous Zoning Code pursuant to Section 1-108(E) of the Updated Zoning Code and is therefore not subject to the recent text amendments for the Miracle Mile corridor.

**TRANSFER OF DEVELOPMENT RIGHTS: RECEIVING SITE ANALYSIS**

The Applicant is requesting approval for the use of approximately 23,597 square feet of TDRs at the Receiving Property in accordance with the 2019 Resolution. It is important to note that the additional 25% of FAR obtained from the use of TDRs (approximately 23,597 +/- square feet of the total 117,980+/- square feet of total FAR approved for the Project) is solely dedicated to the development of the residential building fronting Andalusia Avenue (“**Andalusia Building**”). Specifically, the building facing Miracle Mile contains approximately 27,201 +/- square feet of FAR, which is well under the maximum 3.2 FAR (with Med I Bonus) permitted for the northern portion of the Property facing Miracle Mile (“**Miracle Mile Building**”). In other words, none of the additional FAR received from the use of TDRs are being allocated to the Miracle Mile Building.



*Image: East Elevation of Approved Project - Andalusia Building outlined in orange and Miracle Mile Building outlined in green*

100 Miracle Mile  
Transfer of Development Rights (Receiving Site)

Pursuant to Section 3-1006 of the Zoning Code, the Receiving Property is zoned Mixed Use and is located within the boundaries of the Central Business District. For these reasons coupled with the reasons outlined below, the use of said TDRs for the development of the Approved Project satisfies the applicable criteria pursuant to Section 3-1006 of the Zoning Code and, therefore, should be approved as a Receiving Property.

***a. Applicable site plan review requirements per Article 3, Division 2, General Development Review Procedures and conditional use review requirements per Article 3, Division 4, Conditional Uses.***

In accordance with Article 3 of the Zoning Code, the Board of Architects issued preliminary approval for Mediterranean Architectural Bonus, Level 1 on September 6, 2018. Additionally, the City Commission adopted the Resolution with the condition that the Approved Project is developed in substantial compliance with the Site Plan. As reflected in the Site Plan, the Approved Project contains a total of 117,320 square feet of floor area, including 23,596.8 square feet of floor area reserved for the application of TDRs to the Receiving Property, specifically the North.

In compliance with Section 3 of the Resolution, the Applicant seeks to secure the approvals needed in order to obtain and fully secure the TDRs for the development of the Approved Project. As part of this process, the HPB approved the transfer of 17,009 square feet and 6,588 square feet of TDRs from historically designated properties located at 235 Majorca Avenue and 111 Salamanca Avenue, as respective sending properties. Additionally, the HPB determined that the Approved Project did not adversely affect the historic, architectural, or aesthetic character of the surrounding historic properties in accordance with Section 3-1006(A) of the Zoning Code. As such, the required City departments and boards have reviewed the Approved Project in accordance with the review guidelines and procedures provided in Article 3 of the Zoning Code for site plan review and TDR approval.

***b. The extent to which the application is consistent with the Zoning Code and City Code otherwise applicable to the subject property or properties, including but not limited to density, bulk, size, area and use, and the reasons why such departures are determined to be in the public interest.***

The Approved Project is in full compliance with Section 4-201 of the Zoning Code and is consistent with the City's vision for mixed use development on Miracle Mile and within the Central Business District. Specifically, the development of the Approved Project with ground floor commercial uses and upper level residences will enhance the aesthetic, physical and environmental character of the Downtown Coral Gables area and further activate the Miracle Mile and Andalusia corridors.

***c. The physical design of the proposed site plan and the manner in which the design makes use of adequate provisions for public services, provides adequate control over vehicular traffic, provides for and protects designated common open areas, and furthers the amenities of light and air, recreation and visual enjoyment.***

100 Miracle Mile  
Transfer of Development Rights (Receiving Site)

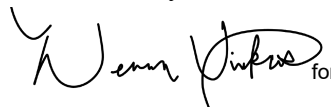
The Approved Project's design seamlessly integrates the diverse fabric of the Miracle Mile architecture by incorporating traditional stucco material coupled with the contemporary application of glass and aluminum. While the Approved Project's traditional stucco material complements the nearby historically designed properties, the glass façade and large windows are compatible with the contemporary design and modern aesthetic envisioned for Miracle Mile by the original developer George Zain. Specifically, the development of the upper level residential units with large windows will allow future residents to stay connected to the vibrant Miracle Mile and Andalusia streetscape directly below. Additionally, the Approved Project is designed with two pedestrian bridges on the third and fifth floors in order to provide the proper clearance and ensure that the Alley directly below will remain open to the public for pedestrian and vehicular traffic.

***d. The conformity of the proposal with the Goals, Objectives and Policies of the City's Comprehensive Plan.***

The Approved Project has been designed to further the goals, objectives and policies of the City's Comprehensive Plan by creating a high quality, mixed-use development where residents and neighbors can live, shop, eat and entertain along the Miracle Mile Corridor and within the Downtown Coral Gables area.

Based on the foregoing, the Approved Project meets the criteria established pursuant to the Sections 3-1005 and 3-1006 of the Zoning Code and therefore, should be approved as a Receiving Property for the use of approximately 23,596.8 square feet of TDRs. We look forward to your favorable consideration of our Application. As always, should you have any questions or require any additional information, please do not hesitate to contact me at 305-579-0821.

Sincerely,

A handwritten signature in black ink, appearing to read "Jorge L. Navarro", with a small "for" written to the right of the signature.

Jorge L. Navarro

Enclosures