



CITY OF DORAL COUNCIL MEETING MEMORANDUM

ITEM TITLE:

A RESOLUTION OF THE MAYOR AND THE CITY COUNCIL OF THE CITY OF DORAL, FLORIDA, FOR THE PARKING VARIANCE FOR 'LIVE LOCAL ACT 1212 NW 82ND AVENUE, DORAL, FL – IMF DORAL', FOR THE PROPERTY LOCATED AT 1212 NW 82ND AVENUE IN THE CITY OF DORAL, FLORIDA, PURSUANT TO SECTION 53-460 – REQUESTS, OF THE CITY'S LAND DEVELOPMENT CODE; AND PROVIDING FOR AN EFFECTIVE DATE.

DEPARTMENT RECOMMENDATION:

CONSIDERATION

BRIEF HISTORY:

On behalf of IMF Doral LLC (the "Applicant"), Abrams Law Firm respectfully requests a parking variance from City Code Section 77-139 for the property located at 1212 NW 82nd Avenue (the "Property"). The City Code requires 151.2 parking spaces; however, the Applicant proposes to provide 133 spaces—a 12% reduction—to accommodate a multi-family residential project restricted to residents aged 55 and older. The project involves converting an existing hotel into age-restricted apartments in accordance with Senate Bill 102, the "Live Local Act." A public zoning workshop was held on March 25, 2025, to present the project and receive community feedback.

LEGISLATIVE ACTION: (IF APPLICABLE)

Date:	Resolution/Ordinance No.	Comments

FINANCIAL INFORMATION: (IF APPLICABLE)

No.	Amount	Account No.	Source of Funds
1.			
2.			
Total:			

Fiscal Impact Statement: The proposed item has a fiscal impact on revenues and/or expenditures of \$ 0

STRATEGIC PLAN ALIGNMENT:

The proposed project is going to further the “Revenue Growth” strategic goal of the City of Doral Strategic Plan (2023), by increasing the property value, thereby adding new revenues to the city’s property tax base and fees. It is important to note that the additional tax revenues may be used to fund the infrastructure projects in the five-year capital improvement program (CIP).

ATTACHMENT(S):

- A. Exhibit A – Application and Letter of Intent
- B. Exhibit B – Site Plan
- C. Exhibit C – DERM
- D. Exhibit D – DSWM
- E. Exhibit E – Traffic
- F. Resolution



Memorandum

Date: May 14, 2025

To: Honorable Mayor and Councilmembers

From: Zeida Sardinas
City Manager

Department: Michelle M. Lopez
The Corradino Group
Interim Planning & Zoning Director

Subject: **1212 NW 82nd Avenue, Doral, FL – IMF Doral – Parking Variance**

Introduction

Abrams Law Firm, on behalf of IMF Doral LLC (the “Applicant”), submits a request for a parking variance from City Code Section 77-139 for the property located at 1212 NW 82nd Avenue, identified by Miami-Dade County Property Appraiser under Folio No. 35-3034-047-0001 (the “Property”), situated in the City of Doral (the “City”). The Applicant proposes to convert the existing hotel into multi-family residential apartments intended for residents aged 55 and older, in alignment with Live Local Act, Affordable Housing, pursuant to Florida Statutes 166.04151, effective July 1, 2024, the “Live Local Act.” The applicant is requesting a parking variance from the required 151.2 parking spaces to 133 parking spaces, an approximate 12 percent reduction, through this application. Chapter 53 “Administration”, Article X, Variances, Section 53-460, Requests, of the City’s Land Development Code, establishes the variance review procedures. Enclosed in 'Exhibit A' are the letter of intent and application for review.

Public Advertisement

The public notice was advertised (legal advertisement) in Miami-Dade County’s designated publicly accessible website at least 14 calendar days prior to the proceeding (Council Meeting).

***Council Meeting
May 14, 2025***

Property Information

Table I provides a brief overview of the subject project.

Table I		
Live Local Act 1212 NW 82nd Avenue, Doral, FL – IMF Doral		
Property Information		
	General Information	Responses
1	Project Name	Live Local Act 1212 NW 82 nd Avenue, Doral, FL - IMF Doral
2	Applicant	IMF Doral LLC
3	Acres	± 3.35 acres
4	Location	1212 NW 82 nd Avenue, Doral, FL
5	Folio Numbers Associated with Project	35-3034-047-0001
6	Existing Future Land Use Category	Business (B)
7	Existing Zoning District	Industrial (I)
8	Code Compliance Violation	N/A

Source: City of Doral, Planning and Zoning Department (2025).

Zoning/Land Use/Neighborhood Analysis

Table II provides an overview of the land uses surrounding the Property.

Table II				
Live Local Act 1212 NW 82nd Avenue, Doral, FL – IMF Doral – Neighborhood Analysis				
Adjacent Land Uses and Zoning Districts Matrix				
Area	Adjacent Uses	Future Land Use Categories	Zoning Districts	Overlay
Site	Hotel	Business (B)	Industrial (I)	None
North	Railroad, offices & warehouses	Industrial (I)	Industrial (I)	None
South	Retail	Business (B)	Corridor Commercial (CC)	None
East	Offices	Industrial (I)	Industrial (I)	None
West	Retail & Offices	Business (B)	Corridor Commercial (CC)	None

Source: City of Doral, Planning and Zoning Department (2025).

Figure I. Existing site conditions:



Interior view



View from NW 82nd Avenue

Figure II. Illustrates the Property location in the aerial map:



City of Doral

Legend

Property Subject

Planning & Zoning Department

IMF Doral LLC Aerial Map

3/10/2025

Background

The property, located at 1212 NW 82nd Avenue, Doral, FL, and identified by Miami-Dade County Property Appraiser under Folio No. 35-3034-047-0001, spans approximately ±3.35 acres (±145,930.55 square feet of lot area). The property is currently zoned Industrial (I) with a Business (B) designation for future land use map (FLUM) designation.

Developed in 1988 as an extended-stay hotel, the site features eight (8) two-story buildings and four (4) three-story buildings, each containing four (4) units per floor. There are fifty-two (52) apartment units with one (1) bedroom and one (1) bathroom, and sixty (60) studio apartments, for a total of one hundred and twelve (112) units. Additionally, the northeastern area of the property includes a clubhouse with amenities such as a pool, gym, and basketball court.

The applicant intends to convert the existing extended stay hotel into multi-family residential apartments with a deed restriction for residents aged 55 and older, in response to the growing housing demand statewide. This conversion will maintain the exterior and interior structure of the existing buildings; the 112 hotel units were specifically designed for extended stays, resulting in larger-than-average sizes and equipped with kitchens and amenities typical of apartment complexes. The floor plans, including bedrooms and living spaces, will remain largely unchanged.

The project will align with the provisions of Live Local Act, Affordable Housing, pursuant to Florida Statutes 166.04151, effective July 1, 2024. The act aims to promote affordable housing by restricting local governments from enforcing certain use, height, and density regulations.

On April 16, 2024, the site plan application was received by staff; the first review comments were issued on May 7, 2024; the second review comments were issued on October 4, 2024; the third review comments were issued on October 31, 2024; a meeting which requested architectural enhancements to the property was held on January 23, 2025 relating to Land Development Code Sec. 53-319 – *Improvements Required, Upgrade of site improvements for existing development*; the fourth review comments were issued on March 12, 2025; staff received an email on April 7, 2025 outlining 12 proposed changes, while these suggestions offered improvements, most focused on minor refinements around the property rather than significant façade enhancements to the 13 buildings, which were originally requested by the Director on the January 23, 2025 meeting; the fifth review comments were issued on April 29, 2025. In all reviews, the parking deficiencies were identified by Staff.

On March 10, 2025, the applicant submitted a variance application from the Land Development Code Section 77-139 to the City's Planning and Zoning Department to address parking deficiencies. Subsequently, a zoning workshop was held on March 25, 2025, which provided the public with an opportunity to review the project and offer input, particularly regarding the requested parking reduction variance.

Land Development Regulations Consistency Review

The Property is zoned as Industrial (I) with a Future Land Use Map (FLUM) designation of Business (B). As previously described, the site is a 3.35-acre parcel currently developed with an extended stay hotel use built in 1988, occupying 112 units, totaling 35,895.40 SF. The proposed change of use from hotel to multi-family residential with a 55 and older deed restriction requires 151.2 parking spaces, pursuant to City Code Section 77-139, *Required Off Street Parking Spaces*.

While the change of use from hotel to multi-family and related site plan is subject to the regulations under the Live Local Act (LLA), FS 166.04151, the parking standards are subject to the regulations set forth via City Code Section 77-139, as the site is not in close proximity to transit stops, transportation hubs, on street parking, parking lots, or parking garages, the project location does not avail itself to parking reductions pursuant to the LLA. Otherwise noted, a development authorized by the statute must comply with all applicable state and local laws and regulations which includes parking pursuant to Land Development Code Section 77-139.

On March 10, 2025, the applicant submitted a variance request to the City's Planning and Zoning Department, seeking exemption from Land Development Code Section 77-139 due to insufficient parking. Per City of Doral Ordinance No. 2024-09: *"If the qualifying development is not located within one-half mile of a major transit stop as defined herein, then the qualify development shall adhere to the city's required off-street parking requirements in Chapter 77 of the City Code."*

Consequently, this development does not fall near a major transit stop and is required to provide 1.35 parking spaces per unit for age-restricted multi-family housing for individuals aged 55 and older, as specified in Section 77-139. With 112 units, the total parking requirement comes to 151.2 spaces. However, the site currently provides 133 parking spaces resulting in a shortfall of 18.2 parking spaces (roughly 12 percent reduction). The applicant is requesting a parking variance through this application.

Table III

Units	Required	Provided
112	1.35 per unit (1.35 x 112) = 151.2	133
Total Deficit	18.2	

Staff Analysis

Pursuant to City Code Section 53-468(b), "All Other Variances", the following criteria shall apply in all variance cases other than those relating to building and fire codes:

The criteria in subsection (b) of this section shall be used to determine the justification for granting of relief from requirements of the development code. All variance requests shall demonstrate the application of each criterion to the specific case.

- (1) Special conditions and circumstances exist which are peculiar to the land, structure or building involved, and which are not applicable to other lands, structures or buildings in the same zoning district.

Staff Analysis:

While the subject site does not demonstrate special conditions specified by Criteria No. 1 that would justify a parking variance pursuant to Section 53-468(b), the site was developed in 1988, under regulations established by Miami-Dade County prior to the City's incorporation in 2004. In an effort to reduce the initial parking variance applied for, specifically 224 spaces required where 133 spaces are available, the Applicant has proffered a deed restriction limiting the project to multi-family residential apartments intended for residents aged 55 and older thereby reducing the parking request to 151.2 spaces where 133 spaces are required.

- (2) The special conditions and circumstances are not the result of actions of the applicant.

Staff Analysis:

The parking deficiency prompting this variance request is a result of the applicant's conversion of the site from an existing hotel, built prior to the City's incorporation, to an age-restricted multi-family residential use. While the proposed use is subject to a higher parking standard under the current municipal code, the Applicant argues that similar communities do not utilize parking to the standards required by the City Code.

- (3) Literal interpretation and enforcement of the development code regulations would deprive the applicant of rights commonly enjoyed by other properties in the same zoning district under the terms of the development code and would work unnecessary and undue hardship on the applicant.

Staff Analysis:

The project review is subject to the regulations pursuant to the Live Local Act (LLA), pursuant to FS 166.04151, Affordable Housing. The Statute provides that *"notwithstanding any other law or local ordinance or regulation to the contrary, the governing body of a municipality may approve the development of housing that is affordable, as defined in s. 420.0004, including, but not limited to, a mixed-use residential development, on any parcel zoned for commercial or industrial use, so long as at least 10 percent of the units included in the project are for housing that is affordable. The provisions of this subsection are self-executing and do not require the governing body to adopt an ordinance or a regulation before using the approval process in this subsection."* As such, while the

underlying zoning district and FLUM designation do not permit multi-family housing, the LLA mandates approval of such administratively.

- (4) The variance, if granted, is the minimum variance necessary to make possible the reasonable use of the land, building or structure.

Staff Analysis:

The requested variance does not represent the minimum necessary relief to enable reasonable use of the property. According to City Code Section 53-319(4)(d), any variance granted for existing site developments must be accompanied by site and architectural upgrades that bring the property into compliance with current development standards.

Specifically, the applicant is required to implement the architectural enhancements outlined in Chapter 86 (Sections 86-25 through 86-29), which include façade articulation, enhanced building entryways, material diversity, and improved pedestrian connectivity. The Applicant is intending to comply with necessary building maintenance, including, but not limited to roof replacement, painting, and replacement of railings and balconies on the second floor of each structure. The Applicant also intends to incorporate bicycle racks, replace signage, and resurface the pool area. All proposed work is subject to building permits and compliance with the municipal, County, State, and Federal regulatory requirements.

- (5) Granting the variance request will not confer on the applicant any special privilege that is denied by the development code to other lands, buildings or structures in the same zoning district.

Staff Analysis:

Granting the variance will allow the project to proceed by repurposing the existing structures, while providing an affordable housing option for the aging community, specifically for residents 55 and older.

- (6) The granting of the variance will be in harmony with the general intent and purpose of this Land Development Code and will not be injurious to the surrounding properties or detrimental to the public welfare.

Staff Analysis:

Granting the variance is aligned with the public welfare of the aging community, as the project provides an opportunity for affordable housing within the City limits. Housing costs continue to rapidly increase throughout Miami-Dade County, limiting options for the aging population.

Recommendation

Staff requests that the Mayor and City Councilmembers CONSIDER the proposed parking variance for IMF Doral, located at 1212 NW 82nd Avenue, Doral, Florida, as the collective project provides an affordable housing opportunity for the aging population within the City limits.