

James R. Williams, Jr.
Shareholder
(305) 376-6008
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March 24, 2026

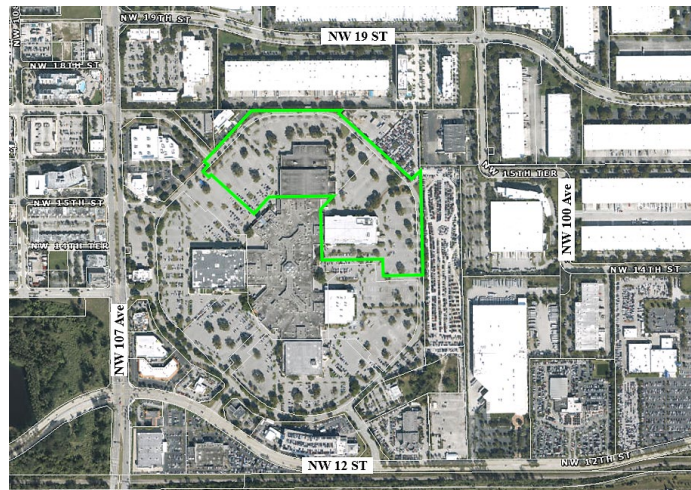
Via Electronic Submission

Mr. Alexander Magrisso
Planning & Zoning Director
City of Doral
8401 NW 53 Terrace, 2nd Floor
Doral, Florida 33166

Re: Amended and Restated Letter of Intent / Land Development Code Text Amendment Creating the “Mall Mixed Use (MMU)” Zoning District (the “Application”) / Greystar Development East, LLC

Dear Mr. Magrisso:

Please accept this Amended and Restated Letter of Intent on behalf of Greystar Development East, LLC (the “**Applicant**”), for its application for a public hearing in connection with its request to amend the text of the Land Development Code (the “**LDC**”) of the City of Doral (the “**City**”) by creating the “Mall Mixed Use” zoning district (the “**Application**”). *A draft of the proposed MMU zoning district text is attached as **Exhibit “A”**.* The approval of the Application will establish a regulatory framework permitting residential development opportunities on shopping centers of fifteen (15) acres or larger that are designated as the **Mall Mixed Use (MMU)** zoning district on the City’s Zoning Map. Specifically, approval of the Application will permit residential uses to be incorporated within a portion of the Miami International Mall (the “Mall or Miami International Mall”) identified by Miami-Dade County Tax Folio Numbers 35-3032-008-0050, 35-3032-008-0140, and a portion of 35-3032-008-0010 (the “**Property**”). For reference purposes, please find an aerial exhibit of the general boundaries of the Property outlined in green below.



As of the date of this letter, the Applicant has also filed the following nine (9) concurrent application requests:

1. A Comprehensive Plan Text Amendment to create the “Mall Mixed Use” designation to permit residential development as applied to the proposed “Mall Mixed Use” zoning district.
2. A Future Land Use Map Amendment to redesignate the Property from “Business” to the “Mall Mixed Use” land use designation.
3. A Zoning Map Amendment to rezone the Property into the “Mall Mixed Use” zoning district.
4. Site Plan Approval application to allow the development a multifamily residential project on the west ± 7.327 acres (319,162 square feet) of that certain parcel of land located at 1625 NW 107 Avenue and identified by Miami-Dade County Tax Folio Number 30-3032-008-0050 (“**Residential Site No. 1**” or “**Site 1**”).
5. Site Plan Approval application to allow the development a multifamily residential project on the east ± 5.66 acres (246,788 square feet) of that certain parcel of land located at 1625 NW 107 Avenue and identified by Miami-Dade County Tax Folio Number 30-3032-008-0050 (“**Residential Site No. 2**” or “**Site 2**”).
6. A Modification to the Miami International Mall Consolidated Development of Regional Impact (“**Miami International Mall Consolidated DRI**”) Development Order to permit residential development within Miami International Mall.
7. The Administrative Release of a Declaration of Use recorded in Official Records Book 17735, Page 3022, which restricted the use of a portion of the Property to a limited automobile service center.
8. A Partial Release of the Declaration of Restrictions recorded in Official Records Book 10619, Page 1984 of the Public Records of Miami-Dade County, Florida.
9. A Modification of the Declaration of Restrictive Covenants recorded in Official Records Book 11212, Page 1613 of the Public Records of Miami-Dade County, Florida.

Project Background. The Property comprises portions of the Mall previously occupied by former big-box department stores and the adjacent surface parking areas. The Project represents a once-in-a-generation opportunity to reimagine underutilized retail space at Miami International Mall as a vibrant, design-forward residential community, one that breathes new life into a beloved South Florida landmark while delivering the kind of activated, mixed-use destination that modern urban communities demand. Greystar, one of the world’s leading multifamily developers, brings to this Project a proven track record of transformative residential development and a genuine commitment to quality, sustainability, and community integration.

Miami International Mall has served as a cornerstone of the Doral community for decades. Yet like many regional malls across the country, it now faces the structural shifts that have transformed brick-and-mortar retail. Rather than resist these forces, the Applicant embraces them, proposing a forward-looking, mixed-use redevelopment that honors the mall's legacy while securing its long-term relevance and vitality.

The Project's overall introduction of a maximum of 896 new residences at a location with unmatched connectivity and access to employment, retail, dining, and entertainment, all within the City of Doral, one of South Florida's most desirable and fastest-growing communities. The Project delivers the kind of high-quality, professionally managed rental housing that Doral residents and workers are actively seeking, helping to address a regional need while generating meaningful economic activity, employment, and tax base for the City.

Proposed LDC Text Amendment. The Applicant's proposed Mall Mixed Use (MMU) zoning district aligns with these regional dynamics and the City's smart-growth principles by facilitating efficient infill redevelopment on existing greyfield sites—reusing paved areas and vacant anchor pads rather than consuming undeveloped land. As the City considers updates to its Comprehensive Plan and LDC, it is essential that these documents reflect evolving market conditions and regional land-use patterns. Creation of the MMU district will help promote balanced development, revitalize aging commercial centers, and introduce new active uses that support economic resiliency and long-term community vitality.

Analysis of Review Requirements. Pursuant to Section 53-213(c) of the City of Doral Code of Ordinances, amendments to the Land Development Code shall be evaluated based on consistency with the Comprehensive Plan, consistency with the LDC, and where applicable the factors traditionally applied to rezoning amendments. The proposed LDC text amendment satisfies each of these criteria, as outlined below:

(1) Consistency with the Comprehensive Plan

The proposed amendment to create the "Mall Mixed Use" zoning district is fully consistent with the City's Comprehensive Plan, as amended concurrently through the proposed Comprehensive Plan text amendment establishing the Mall Mixed Use land use designation.

The requested LDC text amendment directly implements newly adopted Comprehensive Plan policy intended to address the evolution and redevelopment of regionally significant shopping centers. In keeping with the proposed Mall Mixed Use designation, the LDC text amendment reflects current land use conditions at Miami International Mall, supports adaptive reuse of underutilized commercial property, and advances the Plan's goals of promoting economic viability, efficient land use, and sustainable development patterns.

The LDC text amendment does not conflict with any other element of the Comprehensive Plan, including transportation, infrastructure, housing, or capital improvements. Instead, it enhances internal trip capture, maximizes existing infrastructure investments, and supports

long-term reinvestment in an established urbanized area. As stated in the CDMP Traffic Analysis, prepared by Vala Group, Inc, dated March 20, 2026, the maximum proposed development potential of the “Mall Mixed Use” designation will have massive reductions in trips to the Property when measured against the maximum development potential under the current “Business” land use designation resulting in the following trip reductions:

The change in the future land use designation will reduce the amount of traffic the site could potentially generate by 26,391 daily, 274 AM peak hour, and 1,412 PM peak hour trips. [underlined for emphasis]

As such, the proposal maintains internal consistency within the Comprehensive Plan and advances its adopted goals, objectives, and policies. Additionally, the Project furthers the following Comprehensive Plan policies:

***Policy 1.1.3:** Where appropriate, place higher densities in close proximity to transit stops. By January 2018, complete a study with recommended actions of land use and zoning densities near transit access points in Doral measuring them against a minimum transit viability density standard of 7 units per acre.*

The Project directly advances the City’s mobility and sustainability objectives by locating new residential density within walking distance of existing transit service. By introducing a meaningful number of residential units at this location, the Project helps support the City’s goal of achieving transit-supportive densities that meet or exceed the minimum viability threshold of 7 units per acre. This strategic infill pattern not only reduces reliance on single-occupancy vehicles but also strengthens ridership potential for future transit expansions envisioned in the Comprehensive Plan. The Project therefore aligns with Policy 1.1.3 by reinforcing Doral’s emerging multimodal urban fabric and placing households exactly where transit can serve them most efficiently.

***Policy 1.1.4:** Search for evolving opportunities in the Future Land Use Element (FLUE) and LDC for additional cluster residential development and energy-efficient, multi-story homes on smaller lots.*

The Project transforms an underutilized commercial property into a more sustainable and efficient land use consistent with the City’s long-term planning directives. By incorporating multi-story residential buildings with modern, energy-efficient systems, the Project demonstrates the type of forward-looking housing model envisioned by this policy. The site’s compact development structure allows for a more thoughtful use of land, enabling additional green space and reduced impervious surface. This redevelopment represents exactly the kind of opportunity the Comprehensive Plan encourages—leveraging infill sites to deliver high-quality, energy-efficient housing in a clustered, space-efficient configuration.

Policy 1.4.4: *Look for opportunities to preserve and expand open green space in the City. Revisit current standards for open space, parking, and local roadway dimensions with an eye toward reducing impervious area. Incentives for multi-story, cluster housing and structured parking should also be explored. Also, consider reducing parking space requirements for private developments within ½ mile of a transit stop.*

The Project addresses the City’s environmental and urban design objectives by replacing predominantly paved, low-yield commercial land with a thoughtfully planned residential development that integrates meaningful open green space. By utilizing multi-story residential forms and exploring reduced parking needs due to proximity to transit, the Project significantly decreases the site’s impervious footprint. This development approach directly supports Policy 1.4.4 by demonstrating how higher-density, vertical development can increase on-site green areas while promoting a more walkable, transit-supportive environment. The Project exemplifies the City’s vision of using redevelopment as a tool to restore green space and reduce heat-island effects.

Policy 2.1.13: *Discourage land use patterns indicative of urban sprawl in the Future Land Use Map and any amendment applications by dictating compact development, mixed-use where appropriate, and efficient use of public facility capacity and resources, while protecting single-family neighborhoods.*

By shifting an exclusively commercial parcel toward a mixed-use, compact residential pattern, the Project directly counters sprawl-related land consumption and advances the City’s goal of promoting more efficient use of existing urban areas. The site is already serviced by infrastructure and proximate to employment, schools, and transit routes. Introducing residential uses here aligns with Policy 2.1.13 by strengthening the City’s internal land use balance, reducing commute distances, and promoting infill rather than outward expansion. This redevelopment approach supports the City’s long-term strategy of cultivating walkable, mixed-use districts that optimize land resources and decrease development pressure on peripheral areas.

Policy 4.1.1: *Through the City’s adopted Future Land Use Map and land use designations, promote a mix of residential land use categories and densities throughout the City.*

The Project contributes directly to the City’s objective of diversifying residential opportunities by introducing a mixed-use land use category in an area currently restricted to commercial activity. This broadens the variety of housing types available to residents while enhancing the balance between residential and employment uses within the community. The Project’s proposed density and housing typology complement the surrounding urban context and advance the City’s intent to distribute residential uses more strategically across Doral’s urban landscape. In doing so, the Project supports a healthier, more sustainable mix of land uses citywide.

***Policy 4.1.8:** Increase the City’s residential potential within designated areas such as the DMU and CMU land use categories to promote mixed use development.*

The Project reinforces the City’s mixed-use planning framework by increasing residential capacity within a designated mixed-use area (i.e., the proposed MMU). Consistent with Policy 4.1.8, the application strengthens the vitality of the area by adding housing that will support nearby commercial, civic, and neighborhood-serving uses. By incorporating residential development into an area already conceptually structured for mixed use, the Project activates the district with a built-in resident base, creating a more complete, self-sustaining neighborhood ecosystem. This directly fulfills the Comprehensive Plan’s goal of leveraging mixed-use districts to expand housing opportunities while enhancing walkability and reducing transportation impacts.

(2) Consistency with Applicable Sections of the Land Development Code

The proposed LDC text amendment is consistent with the City’s Land Development Code and is coordinated with concurrently submitted amendments that establish implementing regulations.

Specifically, the proposed “Mall Mixed Use” (MMU) zoning district corresponds directly with the proposed “Mall Mixed Use” land use designation and related Land Development Code provisions. Together, these amendments create a comprehensive and internally consistent regulatory framework governing the type, scale, and form of development anticipated on the Property.

Approval of the LDC text amendment will not result in uncontrolled development or circumvent existing City review authority. All future development will remain subject to zoning, site plan approval, and design review pursuant to the Land Development Code, ensuring continued compliance with City standards.

(3) Additional Considerations (Applied as Appropriate)

While the LDC text amendment is not a rezoning action, consideration of the following factors further supports approval of the requested amendment.

a. Whether Justified by Changed or Changing Conditions

The proposed amendment is justified by changed and changing conditions affecting both the Property and the regional retail marketplace.

Miami International Mall, like many enclosed regional malls, is undergoing a transition driven by declining demand for traditional big-box retail and increased demand for experiential, mixed-use environments. Former department store spaces and surplus surface parking areas no longer serve their original function and present appropriate opportunities for adaptive reuse.

The Mall's reinvestment strategy, including the introduction of entertainment and lifestyle uses, reflects this shift. Incorporating a residential component through the Mall Mixed Use designation and corresponding LDC text amendment directly responds to these conditions by aligning land use policy with contemporary market realities and long-term redevelopment trends.

b. Whether Adequate Sites Already Exist for the Proposed Uses

Although residential land uses exist elsewhere in the City, the Property offers a unique and appropriate site for residential development due to its size, infrastructure capacity, accessibility, and integration within a regional activity center.

The Property is fully urbanized, served by existing utilities and transportation facilities, and located within walking distance of employment, retail, dining, and entertainment opportunities. Introducing residential uses within this context promotes efficient land use, supports a live-work-play environment, and reduces pressure to accommodate housing demand on undeveloped land.

Accordingly, the LDC text amendment, when coupled with the Mall Mixed Use land use designation, will facilitate the creation of the Mall Mixed Use zoning district, establishing a strategic and efficient location for mixed-use residential development.

c. Whether Land Development Code Requirements Ensure Compatibility

Compatibility with surrounding properties will be ensured through a combination of existing site conditions and newly proposed regulatory controls.

The proposed Land Development Code amendments establish detailed development standards for the Mall Mixed Use zoning district, including controls on building height, setbacks, landscaping, open space, buffering, and parking. These standards are specifically crafted to address the scale and internal organization of mall-based mixed-use development.

Additionally, the Mall's internal circulation system, including its ring road configuration and expansive perimeter setbacks, provides substantial physical separation from adjoining properties. This layout ensures a level of buffering and compatibility that exceeds what is typically achievable on conventional infill sites.

Finally, the City retains full authority to review and approve future development through site plan and design review processes, ensuring continued compliance with Comprehensive Plan policies and Land Development Code standards.

Conclusion. The proposed LDC text amendment satisfies all applicable review criteria set forth in Section 53-213(c) of the City's Code. The amendment is consistent with the Comprehensive Plan, coordinated with implementing Land Development Code provisions,

responsive to changing market conditions, and supported by appropriate regulatory standards to ensure compatibility with surrounding land uses.

Based on the foregoing, we respectfully request your favorable review and recommendation. We appreciate your consideration and look forward to continuing to work collaboratively with City staff. Should you have any questions or require additional information, please do not hesitate to contact me at (305) 376-6008.

Respectfully submitted,

GUNSTER

A handwritten signature in blue ink, appearing to read "James R. Williams Jr.", is positioned below the printed name "GUNSTER". The signature is fluid and cursive.

James R. Williams Jr., Esq.

Cc: Catherine M. Carbonell, Esq.
Alberto J. Torres, MBA, MM

Enclosure



8401 NW 53RD Terrace, Second Floor, Doral, Florida 33166 Tel. (305) 593-6630 Facsimile: (305) 593-6768 Website: cityofdoral.com

PUBLIC HEARING/ ADMINISTRATIVE REVIEW APPLICATION PLANNING AND ZONING DEPARTMENT

Please check one:

- CITY COUNCIL
- ADMINISTRATIVE REVIEW

OFFICIAL USE ONLY Application No.: LAND-2511-0032 Date Received:
REVISED 10:03 am, Mar 27, 2026

INSTRUCTIONS

This application, with all supplemental data and information, must be completed in accordance with the specific instructions in this application. Applications and all supplemental information must be filed no later than 60 days prior to the regular public hearing date.

APPLICATION

Please indicate which type of application you are submitting by checking one category below:

- | | |
|--|--|
| <input type="checkbox"/> Change in Zoning District | <input type="checkbox"/> Plat |
| <input type="checkbox"/> Variance | <input type="checkbox"/> Entry Feature |
| <input type="checkbox"/> Appeal of Decision | <input type="checkbox"/> Site Plan |
| <input type="checkbox"/> Conditional Use | <input checked="" type="checkbox"/> Other <u>Land Development Code Amendment</u> |

IMPORTANT: THE APPLICANT, OR REPRESENTATIVE, MUST BE PRESENT AT THE HEARING TO PRESENT THE PROPOSAL.

Please print or type

Name of Applicant, agent or tenant (with owner's affidavit) James R. Williams Jr., Esq. on behalf of Greystar Development East, LLC		
Mailing Address c/o James R. Williams Jr., Esq. Gunster, Yoakley, & Stewart, P.A. 600 Brickell Avenue, Suite 3500	City, State, Zip Miami, Florida 33131	Telephone 305-376-6008 Fax Email: jameswilliams@gunster.com ccarbonell@gunster.com
Name of Owner N/A		
Mailing Address	City, State, Zip	Telephone Fax Email:

Is this application the result of a Notice of Violation or deviation from approved plans? Yes No

Are there any existing structures on the property? Yes No

If so, what type? (CBS, Frame, Frame-Stucco, Wood, Other) CBS

Any applications that involve an existing building must provide copy of the approved plans, plat, site plan approval or any prior zoning history. Plans that are not filed with this application will not be considered by the City of Doral.

All data and exhibits submitted in connection with this application become a PERMANENT PART OF THE PUBLIC RECORDS OF THE CITY OF DORAL.

The following enclosures where applicable MUST BE ATTACHED to complete the application:

- A. **SURVEY OF PROPERTY:** For vacant or improved property. Must be no more than one year old and sealed by a registered land surveyor. The Building and Planning Department may require a more recent survey if a site visit indicates any discrepancies. Survey must include, where applicable, lot lines, all structures, walls, fences, landscaping, and all physical improvements. All existing trees must be shown.
- B. **SITE DEVELOPMENT PLAN:** Where applicable, plans shall show location and elevations of existing and proposed buildings, proposed additions, alterations and use of each; all dimensions of buildings and space between buildings; setbacks from property lines; proposed and existing off-street parking showing lined spaces, driveways, handicap spaces, compact spaces; a landscape plan that complies with the City of Doral Landscape Ordinance showing location of existing and proposed vegetation, landscaping (i.e. trees and hedges), number, height and species type. The plan shall also show wall and fence height, location and material. Prior ASPR or Site Plan Approval Resolution and plans must be submitted.
- C. **LETTER OF INTENT:** A letter of intent must be filed explaining in detail the history of the property, prior approvals and the extent of the proposed project. Show how code criterion is met. Signature and address must be shown.
- D. **OTHER GOVERNMENTS/AGENCIES ENDORSEMENTS:** All applicable DERM, Miami-Dade Fire Department, or the Miami-Dade Water and Sewer Department's endorsement must be submitted.
- E. **OWNER'S AFFIDAVIT:** Owner's affidavit allowing the filing of an application is required on all applications where the applicant is not the owner of the property under consideration; same form allows posting of property.
- F. **TRAFFIC STUDY:** A detailed traffic analysis considering the impacts of the proposed development on current level-of-service (LOS) standards in abutting (or nearby) roads and intersections.

NOTE: SURVEYS, SITE DEVELOPMENT PLANS, LANDSCAPE PLANS MUST BE SUBMITTED AT STANDARD PLAN SIZE. AN APPLICATION WILL NOT BE CONSIDERED COMPLETE UNLESS THE APPLICATION AND SUPPORTING DOCUMENTATION (FRONT AND BACK), APPROPRIATE PLAN DRAWINGS AND SURVEYS ARE SUBMITTED.

In support of this request, I submit the following additional items, which are attached hereto and made a part of this application:

- 35 MM Photo(s) (Mounted 8 1/2 x 11)
- Letters from Area Residents
- Other _____

Please check only one of the following options:

- FOR CITY COUNCIL PURPOSES

I/We understand that additional public hearings may be required and any interested person may discuss the application with City staff to the same extent as the applicant. The application may change during the hearing process and additional public notices may affect the schedule of the hearings. If my/our appeal is denied, I/we must file an appeal to the Circuit Court within 30 days of the meeting.

10/7/2025
Date



Lewis Stoneburner, Vice President of Greystar Development East, LLC

I/We Greystar Development East, LLC, a Delaware limited liability company as Owner (s) of Lot (s) N/A
Block _____ Section _____ PB/PG _____

of property which is located at _____
desire to file an application for review before the City, I/We do understand and agree as follows:

1. That the application for public hearing will not be heard unless the applicant is present at the hearing.
2. The property will be posted with a sign, which must not be removed until after the public hearing, at which time the City staff will remove the sign. The applicant will be responsible for advertising the application and sending the mail out per the notification requirements of the City Code.
3. That the requirements of the Municipal Code, Miami-Dade County Ordinances, the Florida Building Code (FBC), and other government agencies may affect the scheduling and ability to obtain/issue a permit for the proposal.
4. That the only exceptions to the City's Land Development Code (LDC) are those that have been specified in the written application (via variance application) and any other code or plan issues will be corrected by modifying the plans to comply with the respective codes and ordinances of the City of Doral or Miami-Dade County ordinances.
5. That the applicant will be responsible for complying with all the conditions and restrictions imposed by the City Council or City Staff in connection with the request and will take the necessary steps to make the request effective if approved by the City Council or City Staff.
6. That it is the responsibility of the applicant to submit a complete application with all of the documents necessary for the City Council or City Staff to consider the applicant's request.
7. That the applicant is responsible for timely submission and accuracy of all items requested on the application. Any information submitted less than 45 days prior to a public hearing will result in being postponed to the next available hearing date. Legislative items must have all requested items submitted 30 days prior to hearing.
8. That the applicant is responsible for any additional fees which include but are not limited to mailing notices to surrounding property owners, advertising, outside consultant reviews, legal fees, surveys, and technical reports.

I/We as the owners of the subject property (check one):

- do hereby authorize James R. Williams Jr., Esq. and Gunster, Yoakley, & Stewart, P.A. to act on my/our behalf as the applicant.
- will on my/our own behalf act as applicant(s), and make application in connection with this request for a public hearing administrative review before the City Council or City Staff.

Applicant's Name: Greystar Development East, LLC, Signature [Signature] Date 10/7/25
a Delaware limited liability company Lewis Stoneburner, Vice President

STATE OF FLORIDA
COUNTY OF Broward

The foregoing instrument was acknowledged before me by means of physical presence or online notarization this 7th day of October, 2025, by Lewis Stoneburner as Vice President for Greystar Development East, LLC.



[Signature]
(Signature of Notary Public-State of Florida)
Christie Kielty
(Name of Notary Typed, Printed, or Stamped)

Personally Known OR Produced Identification _____
Type of Identification Produced _____

City Code Sec. 2-279, Charges for consulting services established.

(a)The city manager or his/her designee, in the review of any application, may refer any such application presented to it to such engineering, planning, legal, technical, or environmental consultant or professionals employed by the city as the manager shall deem reasonably necessary to enable him to review such application as required by law. Charges made by such consultant shall be in accord with the charges customarily made for such services in the county, and pursuant to an existing contractual agreement by and between the city and such consultant. Charges made by the city shall be in accord with the hourly rates charged by such consultants or hourly rates of employed professionals and shall be paid on submission of a city voucher.(b)The applicant shall reimburse the city for the cost of such consultant or employed professional services upon submission of a copy of the voucher, within 30 days of submission of a copy of the voucher and as a condition of the zoning resolution. These fees are in addition to any and all other fees required by other law, rule, or regulation of this Code. (Ordinance No. 04-07)

Greystar Development East, LLC, a Delaware limited liability company (Property Owner), hereby acknowledge and consent to the payment of all applicable fees as it relates to the application and request for the review and processing of the requested Administrative Hearing, Public Hearing, or legal instrument. Fees shall include, but are not limited to review by city staff, city contractors, agents or consultants, advertisement(s), recordings, mailings, and any additional costs related to the submitted application.

Affidavit to be executed by property owner. All right and entitlements run with the property.

Applicant's Name Greystar Development East, LLC, Signature [Signature] Date 10/7/2025
a Delaware limited liability company Lewis Stoneburner, Vice President

STATE OF FLORIDA
COUNTY OF Broward

The foregoing instrument was acknowledged before me by means of physical presence or online notarization this 7th day of October, 2025, by Ana Pedrajo as Vice President for Greystar Development East, LLC.



[Signature]
(Signature of Notary Public-State of Florida)
Christie Kielty
(Name of Notary Typed, Printed, or Stamped)

Personally Known OR Produced Identification _____
Type of Identification Produced _____

DISCLOSURE OF INTEREST*

If a **CORPORATION** owns or leases the subject property, list principal stockholders and percent of stock owned by each. [Note: Where principal officers or stockholders consist of other corporation(s), trust(s), partnership(s) or similar entities, further disclosure shall be made to identify the natural persons having the ultimate ownership interest].

CORPORATION NAME: Greystar Development East, LLC

<u>NAME AND ADDRESS</u>	<u>Percentage of Stock</u>
<u>Please see Exhibit "A"</u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>

If a **TRUST or ESTATE** owns or leases the subject property, list the trust beneficiaries and percent of interest held by each. [Note: Where beneficiaries are other than natural persons, further disclosure shall be made to identify the natural persons having the ultimate ownership interest].

TRUST/ESTATE NAME:

<u>NAME AND ADDRESS</u>	<u>Percentage of Interest</u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>

If a **PARTNERSHIP** owns or leases the subject property, list the principals including general and limited partners. [Note: Where partner(s) consist of other partnership(s), corporation(s), trust(s) or similar entities, further disclosure shall be made to identify the natural persons having the ultimate ownership interests].

PARTNERSHIP OR LIMITED PARTNERSHIP NAME:

<u>NAME AND ADDRESS</u>	<u>Percent of Ownership</u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>
<u></u>	<u></u>

If there is a **CONTRACT FOR PURCHASE** by a Corporation, Trust or Partnership, list purchasers below, including principal officers, stockholders, beneficiaries or partners. [Note: Where principal officers, stockholders, beneficiaries or partners consist of other corporations, trusts, partnerships or similar entities, further disclosure shall be made to identify natural persons having ultimate ownership interests].

NAME OF PURCHASER: _____

NAME, ADDRESS AND OFFICE (if applicable)	Percentage of Interest
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Date of contract: _____

If any contingency clause or contract terms involve additional parties, list all individuals or officers, if a corporation, partnership or trust:

NOTICE: For changes of ownership or changes in purchase contracts after the date of the application, but prior to the date of final public hearing, a supplemental disclosure of interest is required.

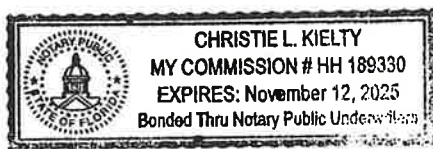
The above is a full disclosure of all parties of interest in this application to the best of my knowledge and belief.

Signature: [Signature] Lewis Stoneburner, Vice President of Greystar Development East LLC
(Applicant)

Sworn to and subscribed before me this 7th day of October, 2005. Affiant is personally known to me or has produced _____ as identification.

[Signature]
(Notary Public)

My commission expires 11/12/2005



*Disclosure shall not be required of: 1) any entity, the equity interests in which are regularly traded on an established securities market in the United States or another country; or 2) pension funds or pension trusts of more than five thousand (5,000) ownership interests; or 3) any entity where ownership interests are held in a partnership, corporation or trust consisting of more than five thousand (5,000) separate interests, including all interests at every level of ownership and where no one (1) person or entity holds more than a total of five per cent (5%) of the ownership interest in the partnership, corporation or trust. Entities whose ownership interests are held in a partnership, corporation, or trust consisting of more than five thousand (5,000) separate interests, including all interests at every level of ownership, shall only be required to disclose those ownership interest which exceed five (5) percent of the ownership interest in the partnership, corporation or trust.

EXHIBIT "A"
DISCLOSURE OF INTEREST

Greystar Development East, LLC (465 Meeting St. Ste 500, Charleston, SC 29403)

Directors/Officers:	Robert A. Faith
	J. Derek Ramsey
	Ashley Heggie
	Matthew Warren
	Todd Wigfield
	Lewis Stoneburner
	Kristin Schul
	Michael Sullivan
	Kurt Wolber
	George Hayward
	John Clarkson
	Darin Cook
	Joshua Glover
	Gary Kerr
	David King
	Ben Liebetrau
	John Roberson
	Julie Skolnicki
	Christopher Mazzola

GREYSTAR DEVELOPMENT EAST, LLC IS AN LLC CONSISTING OF MORE THAN 5,000 SEPARATE INTERESTS, INCLUDING ALL INTEREST AT EVERY LEVEL OF OWNERSHIP, WHERE NO ONE PERSON OR ENTITY HOLDS MORE THAN A FIVE PERCENT OWNERSHIP INTEREST IN THE LLC, WITH THE EXCEPTION OF ROBERT A. FAITH, WHOSE OVERALL INTEREST IS IN EXCESS OF FIVE PERCENT.