

James R. Williams, Jr.
Shareholder
(305) 376-6008
Jameswilliams@Gunster.com

March 23, 2026

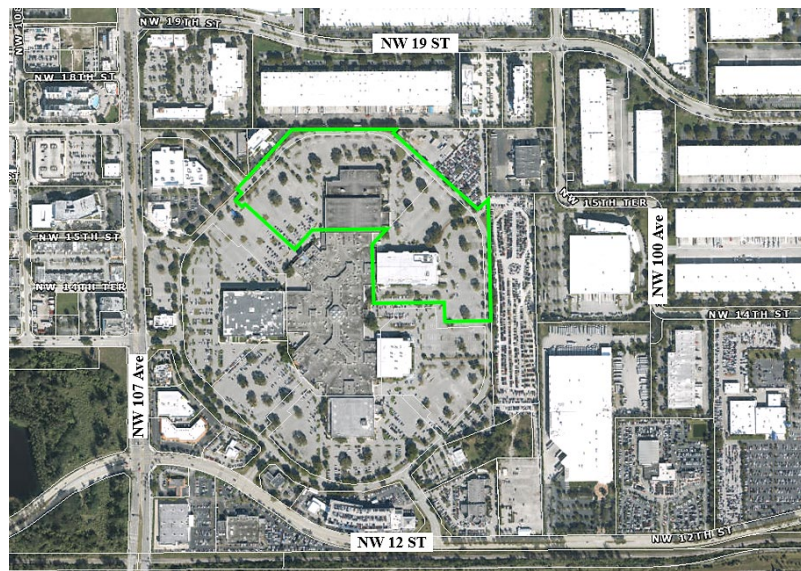
Via Electronic Submission

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

Re: Amended and Restated Letter of Intent / Comprehensive Plan Text Amendment to Create the “Mall Mixed Use” Designation to Permit Residential Uses within Shopping Centers (the “Application”) / Greystar Development East, LLC

Dear Mr. Magrisso,

This Amended and Restated Letter of Intent is submitted on behalf of Greystar Development East, LLC (the “**Applicant**”), for its application for a public hearing in connection with its request to amend the Comprehensive Plan Text to create the “Mall Mixed Use” (MMU) designation in the City of Doral’s (the “**City’s**”) Comprehensive Plan (the “**Application**”). The approval of the Application will permit residential development opportunities on regional shopping malls fifteen (15) acres or more in size within the “Mall Mixed Use” designation in the City’s Future Land Use Plan 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 filed the following nine (9) concurrent application requests:

1. A Future Land Use Map Amendment to redesignate the Property from “Business” to “Mall Mixed Use.”
2. A Land Development Code Amendment to create the “Mall Mixed Use District”.
3. A Zoning Map Amendment to rezone the Property into the “Mall Mixed Use” Zoning District.
4. Site Plan Approval to allow the development of a multifamily residential project on the Property (Site 1).
5. Site Plan Approval to allow the development of a multifamily residential project on the Property (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.

Traditional department-store anchors have declined nationwide, including at Miami International Mall, creating opportunities for adaptive reuse of these large retail spaces. The Mall is presently transitioning toward experiential and entertainment-based tenancy—most notably the forthcoming Elev8 Fun family entertainment center occupying approximately 110,000 square feet of the former Kohl’s building—reflecting a broader repositioning from conventional retail toward experience-driven destinations.

Comparable regional malls across South Florida have undergone similar transformations: the Shops at Sunset Place in South Miami and Southland Mall (now *Southplace City Center*) in Cutler Bay have introduced substantial residential components to sustain long-term viability and create integrated mixed-use environments. These projects illustrate a regional shift in land use, where underutilized retail acreage is repurposed to accommodate housing and complementary uses.

Given these factors, the Applicant is proposing to amend the City’s Comprehensive Plan Land Use Element Text to create the “Mall Mixed Use” category, to include residential uses within large scale shopping centers, such as Miami International Mall. The underlined language in the following recital reflects the Applicant’s proposed text amendment:

This land use category is intended to facilitate the adaptive reuse and revitalization of existing regional shopping malls, consisting of at least fifteen (15) acres, into active, mixed-use, pedestrian-oriented districts. MMU allows a mix of retail/service, office, entertainment/civic uses, lodging, and residential uses in a coordinated redevelopment setting, and is limited to properties that function as an integrated regional shopping mall meeting objective eligibility criteria (e.g., minimum gross acreage, gross leasable area, anchor tenant configuration, and internal pedestrian connectivity). A mix of residential and commercial uses is permitted and required for MMU sites; however, standalone residential buildings may be permitted where an approved conceptual site plan demonstrates safe and convenient connectivity to shared commercial and amenity areas through internal streets, sidewalks/paseos, and other circulation features.

A regional shopping mall means a shopping center which shall consist of at least fifteen (15) gross acres, with a minimum gross leasable area of 300,000 square feet of retail and commercial uses, consisting of at least one anchor tenant that has a minimum of one pedestrian access point leading to an enclosed corridor with multiple retail or commercial stores, and consisting of at least one food court. A food court shall be defined as a collection of different restaurants that share a common patron seating area under a unified roof.

The base density allowed in the MMU category is limited to no more than twenty-five (25) dwelling units per gross acre and maximum building height is six (6) stories. Additional density up to thirty-five (35) dwelling units per gross acre may be granted by the City Council for projects that exhibit creative excellence in exceeding the minimum standards contained in Section 86-83 of the City’s Code. Landscaped open space in MMU must comprise a minimum of 15% of the project site. All rezoning and redevelopment within the MMU must be accompanied by a conceptual site plan (and a site plan for the initial phase, where phased) and must be implemented through a Master Development Agreement (MDA), pursuant to Section 163.3221, Florida Statutes, or similar City-approved instrument to ensure coordinated phasing, enforceable development obligations, and appropriate administration of site planning, connectivity, and public realm improvements.

The proposed text amendment language creating the “Mall Mixed Use” designation permitting residential uses within the “Mall Mixed Use” zoning district encourages efficient infill on greyfield land—reusing paved areas and vacant anchor pads rather than consuming new land—thus advancing the City’s smart-growth principles. In considering an amendment to the City’s Comprehensive Plan, it is important to adapt the City Comprehensive Plan to reflect regional land use shifts and appropriately guide the City’s growth. The proposed amendment will further promote well-balanced development within the City by facilitating the revitalization of

existing shopping centers with new active and compatible uses to; thereby ensuring the long-term growth and success of these critical commercial centers.

Based on the foregoing, we respectfully request your favorable review and recommendation. Thank you in advance for your considerate attention to this application. Should you have any questions or require any 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 above the printed name.

James R. Williams Jr., Esq.

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



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-2511-0031
Date Received:

REVISED

9:53 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:

- | | |
|--|--|
| ☐ Change in Zoning District | ☐ Plat |
| ☐ Variance | ☐ Entry Feature |
| ☐ Appeal of Decision | ☐ Site Plan |
| ☐ Conditional Use | ☒ Other <u>Comprehensive Plan Text 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: c/o jameswilliams@gunster.com; ccarbonell@gunster.com
Name of Owner N/A		
Mailing Address	City, State, Zip	Telephone Fax Email:

PROPERTY INFORMATION

- A. LEGAL DESCRIPTION. (If subdivided – lot, block, complete name of subdivision, plat book and page numbers). If metes and bounds description – Complete description, including section, township and range).

Folio Number(s) N/A

Address _____

Lot(s) _____ Block _____ Section _____ Plat Book No. _____ Page No. _____

FINISHED FLOOR ELEVATION (If applicable): _____ FLOOD ZONE: _____

- B. ADDRESS (If number has been assigned) _____

C. SIZE OF PROPERTY _____ ft. X _____ ft. = _____ sq. ft.; _____ acre(s)
Width Depth

- D. Provide legal description or address of any property held by the owner which is contiguous to that which is the subject matter of this application.

- E. DATE SUBJECT PROPERTY WAS ACQUIRED _____

APPLICANT'S REQUEST:

Specify in full the request. (Use a separate sheet of paper if necessary.)

Creation of the new "Mall Mixed Use" designation.

LETTER OF INTENT

Explain purpose of application, benefit(s) in the change and reasons why this application should be approved. Specify the exact nature of the use or operation applied for, together with any pertinent technical data, which will clarify the proposal. (Use a separate sheet of paper if necessary.)

Please see letter of intent included as part of this application.

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)

☐ Other _____

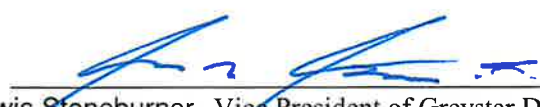
☐ Letters from Area Residents

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.

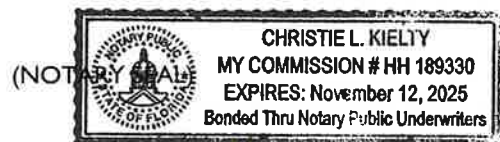
I/We as the owners of the subject property (check one):

- ☒ 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
I, 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]
a Delaware limited liability company

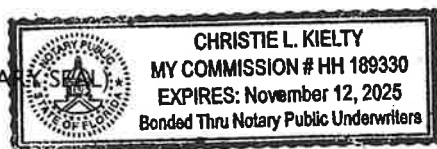
Lewis Stoneburner, Vice President

Date 10/7/2025

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.

(NOTARY SEAL)



[Signature]
(Signature of Notary Public-State of Florida)

Christie Kielty
(Name of Notary Typed, Printed, or Stamped)

Personally Known X 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>
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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>
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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>
<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.

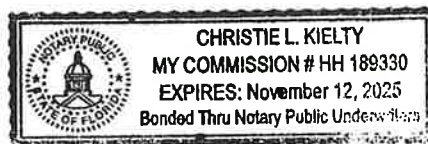
The above is a full disclosure of all parties of interest in this application to the best of my knowledge and belief.

Signature: _____ 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.

C. Kielty
(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.