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March 7, 2025

City of Doral  
Planning & Zoning Department  
8401 NW 53<sup>rd</sup> Ter., 2<sup>nd</sup> Floor  
Doral FL, 33166

**RE: Variance Request**  
**1212 NW 82<sup>ND</sup> Ave., Doral, FL 33126**  
**Parcel ID: 35-3034-047-0001 (Reference)**

To Whom It May Concern,

This firm represents the owners (the “Applicants”) of the property located at 1212 NW 82<sup>nd</sup> Avenue, Doral, FL 33126 (the “Property”). This narrative is offered in support of the variance application, which requests a variance from the City of Doral’s Municipal Code (the “Code”) Sec. 77-139(e) to allow for an approximate thirteen (13) percent reduction in parking at the Property.

### **Introduction and Background**

The Property is a pre-existing development that was utilized as an extended stay condominium hotel with 112 units. The Property consists of eight (8) two-story buildings with four (4) units on each floor, and four (4) three-story buildings with four (4) units on each floor. The Property also maintains a clubhouse with a pool deck, gym, and basketball court. The Applicant determined that the Property was underutilized and sought to convert the Property that not only was favorable for Applicant but also the residents of the City of Doral (the “City”).

Applicant initially proposed to convert the Property from the existing hotel to multifamily residential units given the great demand for apartments in the City. In January 2024, Applicant began the Administrative Site Plan pre-application process which included requesting a zoning interpretation concerning parking base upon Applicant’s traffic and parking study from Julian Perez, the prior Planning Director. *See Exhibit A, interpretation letter.* The interpretation provided by Mr. Perez stated the parking would be sufficient and permitted pursuant to the City’s Municipal Code sections 77.139 and section 77-140, shown below.

#### **Sec. 77-139. Required Off-Street Parking Spaces.**

*(b) Uses not listed. The number of parking spaces required for uses not specifically listed in the matrix shall be determined by the city based upon information provided by the applicant. Applicable information shall include requirements for similar uses and appropriate traffic engineering and planning data, and shall establish a minimum number*

*of parking spaces based upon the principles of this Land Development Code.*

*Sec. 77-140 - Reduction to achieve compliance with other code requirements for existing developments. The city may authorize a reduction in the total number of required parking spaces for existing developments when such reduction is proposed in conjunction with renovation, redevelopment or reuse of the site as part of the development plan approval process. In reviewing the reduction, the city shall consider the extent of the reduction, the degree to which the site is brought into compliance with current code requirements as a result of the reduction, the historical parking utilization of the subject property, the impact such reduction may have on adjoining properties and parking facilities, and any other concern which may be deemed significant by the administrative official.*

Receiving the Planning Director's affirmation that parking would be sufficient at the Property, the Applicant felt confident to rely on zoning interpretation received and continued to invest time and resources into the process. After beginning the administrative site plan process, Ms. Michelle Lopez stepped into the role of Planning Director following the departure of Mr. Perez. Several months into the project, the City's Traffic and Engineering Department requested a traffic study that evaluated a comparator property with a similar number and mixture of unit types. It took approximately 2 months to locate and obtain the Department's approval to study a comparator property that met the Department's specifications. A comprehensive traffic study was conducted that analyzed the traffic patterns of the comparator property and of the Applicant's Property. The results were placed into a report that was provided to the City with a resubmittal that addressed comments on the project. The Department accepted the results of the traffic study and conditionally approved the application. This report is attached hereto as *Exhibit "B"*. Based on this conditional approval, in conjunction with the previous Planning Director's approval of the parking count, it seemed clear that the City would be authorizing the parking reduction based on sections 77-139 and 77-140 of the code.

In around October 2024, Ms. Lopez reevaluated the City's position and concluded that the amount of parking for Applicant's project (previously approved) would not be permitted and deemed it inadequate for a parking reduction without a variance. This decision halted the progression of the project and forced Applicant to adjust their plan in a way that strategically benefited the Applicant and the residents of the community.

Ensuring that the Applicant was not engaging in counterproductive efforts, Applicant chose to address the issue by changing specific details to the initial proposed project. In February 2025, the project was amended to stipulate that the multifamily residential units will now be catered to only persons of ages fifty-five (55) plus. In the Code, section 77-139, it stated the required amount of parking is 1.35 spaces per dwelling unit for age restricted multifamily projects in Non-Downtown Mixed-Use zoning. The Property currently has one hundred thirty-three (133) available spots which is thirteen (13) percent less than the required one hundred fifty-one (151) spots. It is the Planning Director's determination that this deficiency necessitates a variance to the Code.

### **Standard of Review**

The following criteria must be satisfied for a variance to be granted: “(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. (2) The special conditions and circumstances are not the result of actions of the applicant. (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. (4) The variance, if granted, is the minimum variance necessary to make possible the reasonable use of the land, building or structure. (5) Granting of 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. (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.” Code, Sec.53-468(b)(1)-(6).

### **Variance Criteria**

#### ***(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.***

The special conditions and circumstances that exist are peculiar to the land, structure, or building involved, and which are not applicable to other lands, structures, or building in the same zoning district. This project seeks to address the housing crisis for people of ages fifty-five (55) and up. Granting the variance for the parking reduction would allow the project to move forward and address the underserved part of the community. Other age-restricted residential housing options are limited or nonexistent in the City.

Further, the Applicant relied on the previous Planning Director’s reasonable interpretation of sections 77-139 and 77-140 of the Code to expend significant time and money on the site plan process to convert this property from a hotel to multifamily residences. During the site plan process, a comprehensive traffic study of comparator property with a similar number of multi family dwelling units was approved by the Traffic and Engineering Department to be examined, to further justify the parking. The parking count was found to be over the minimum requirement based on the comparator property. Code sections 77-139 and 77-140 specifically authorizes a reduction based on such a traffic study. Still, the City will not approve the site plan without a variance to authorize the parking reduction. Based on these unique circumstances, and specifically the reliance on the previous planning director’s representation, special conditions exist that support the variance.

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

The special conditions and circumstances are not a result of the Applicant's actions. In January 2024, the Applicant proactively addressed potential parking issues and sought a reasonable interpretation based on the traffic study that was provided. The previous Director had granted

approval, citing sections 77.139 and 77-140 of the Code. However, due to the new interpretation provided by the current Director, the project has been brought to a halt, creating an undue hardship and forcing a re-evaluation of the project's details. This includes reconsidering the resources already expended and the plans, despite the fact that the original traffic study had been accepted by the original planning director and the Traffic and Engineering Department.

***(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.***

Literal interpretation and enforcement of the development code 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 undue hardship on the applicant. As previously indicated, the previous Planning Director, Julian Perez, confirmed that the parking count was sufficient and accepted the traffic and parking analysis provided. The Traffic and Engineering Department required a comparator analysis of another similar property to further justify parking, and then accepted the results upon being provided, which justified the parking count. Thereafter, the current Planning Director made a final determination that the parking reduction would require a variance. This determination was made after tens of thousands of dollars and months of time and costs were absorbed to bring the project to the point where it was ready to be approved. The Applicant relied on earlier representations made, based on reasonable interpretations of the written code of the City, which resulted in hardship when the position of the city was reversed as to parking. These circumstances give rise to equitable estoppel and could rise to a statutory taking claim under the Bert Harris Jr. Act, F.S. 70.001, for the loss of a vested right, and undue hardship, further justifying a variance.

Rights commonly enjoyed by others in the zoning district are entitled to seek parking reductions administratively under the plain language of code sections 77-139 and/or 77-140. These rights have been denied to the Applicant, further supporting entitlement to this variance.

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

The variance, if granted, is the minimum variance necessary to make possible the reasonable use of the land, building or structure. The Applicant could have maintained the existing project with unrestricted units, which would have required a nearly fifty (50) percent parking reduction, although supporting by the parking study. Instead, at the suggestion of City officials, the Applicant has offered to restrict the units to age fifty-five (55) and up, which lowers the parking reduction to one point thirty-five (1.35) spaces per unit, instead of two (2) spaces per unit. This resulted in a significantly lower parking reduction of only thirteen (13) percent. Granting the variance for the parking reduction will allow the project to move forward and eventually support the City by meeting the housing shortage, and will serve the older age demographic, which is among the few if not the first such project in Doral.

***(5) Granting of 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.***

Granting this 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. Applicant obtained a specific traffic study used a similar property and found that the provided parking satisfied the Code's requirements. Still, the Applicant further reduced the parking burden by changing the project to an age fifty-five (55) and up community. No special privilege is obtained through this request because the express provisions of the code allows for reductions in parking if supported by a traffic study.

***(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.***

The project will be in harmony with the code because, as the City has found, the parking reduction is justified through traffic studies and supported by express language in code sections 77-139 and 77-140. Therefore, it is consistent with the intent and purpose of the code as expressed by the City Commission.

The relief requested will not be injurious to the surrounding properties because the traffic studies have established that the on-site parking is sufficient. There will not be any impact to surrounding properties. It is in the public welfare to grant the variance to allow an age 55 plus community that is uncommonly offered in the Miami-Dade County, and especially in Doral.

Thank you in advance for your time and attention to this matter. If you have any questions, or if I may be of assistance, my office is available by phone or e-mail at your convenience.

Sincerely,

/s/   
Ryan Abrams, Esq

## **EXHIBIT A**



Planning & Zoning  
Department

February 12, 2024

Ryan Abrams, Esq.  
Abrams Law Firm, P.A.  
888 SE 3rd Ave., Suite 400  
Fort Lauderdale, FL 33316

Re: 1212 NW 82 Avenue  
Doral, Florida 33126  
Folio Number: 35-3034-047-0001 (the "Property")  
Second Amendment to the Live Local Act (LLA) Determination Letter

Dear Mr. Abrams,

The intent of this correspondence is to provide you with a response to your request for clarification dated December 14, 2023.

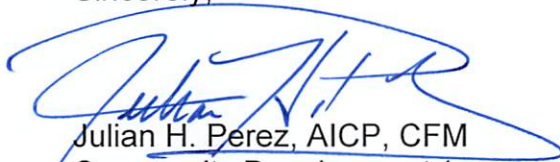
For the purposes of this letter, the Department is utilizing a property lot size of 3.35 acres or 145,926.11 square feet.

Based upon Section 77-140(c)(2) of the City's Land Development Code, at the time of an application for a qualifying project under the Live Local Act, the Department may consider the results of the parking generation analysis prepared by Ms. Lisa S. Bernstein, PE, Traffic Engineer, dated January 4, 2024, which concludes that the "proposed change from hotel to multifamily will not result in a need for additional parking as the results from the ITE Parking Generation Manual, 6<sup>th</sup> Edition indicate less required parking than is currently provided by the existing site. The existing parking is sufficient for the project."

It is important to note that the results of this parking generation analysis only apply to the potential re-use of the development currently existing on the property as a qualifying project under the LLA, provided the structure remains as is. A copy of the parking generation analysis is provided in Exhibit A. This analysis is consistent with Sec.77-140 (c)(2) of the City's Land Development Code. Please note that the issuance of this determination by the City of Doral Planning and Zoning Department Director or designee shall be considered informational, non-binding and shall not be construed as approval and is subject to change.

If you have any questions regarding the information provided in this correspondence, please do not hesitate to contact this office at (305) 593-6630.

Sincerely,



Julian H. Perez, AICP, CFM  
Community Development /  
Planning and Zoning Director

Encl.: Exhibit A – Traffic Statement – Parking Generation

Cc: Francisco Rios, Interim City Manager  
Valerie Vicente, Esq., City Attorney  
Zafar Ahmed, Assistant Planning and Zoning Director  
Guillermo De Nacimiento III, Senior Planner



## LISA S. BERNSTEIN, PE

— TRAFFIC ENGINEER —

Mr. Alex Nahabetian  
IMF Management Doral, LLC  
1212 NW 82 Avenue  
Doral, Florida 33126

January 4, 2024

**Re: Traffic Statement – Parking Generation**

Project Name: Hotel Conversion to Multifamily  
Project Location: 1212 NW 82 Avenue, Doral, Florida 33126  
Project Number: 23-0206

Dear Mr. Nahabetian:

The project understanding is for a Traffic Statement that will identify the parking requirements for the project as requested by the City of Doral.

The existing hotel is located on NW 82 Avenue, just north of NW 12 Street in the City of Doral. The existing 112-room hotel will be redeveloped as a 112-room multifamily residence and there will be no modifications to the existing buildings and driveways.

Parking generation calculations for the multifamily residence are based on parking generation rates and equations published in the Institute of Transportation Engineers (ITE), *Parking Generation Manual, 6<sup>th</sup> Edition*. ITE Land Use Code (LUC) 217 Multifamily Housing – 1 BR (Low-Rise) is used for the analysis of the proposed conditions.

The multifamily residence will have 52 one bedroom-one bath units and 60 studio apartments. The ITE parking generation treats the studio apartments as a one-bedroom dwelling unit for this land use.

The existing site has a total of 132 parking spaces. There are 128 regular parking spaces and four (4) ADA spaces.

The results for the parking requirements are summarized in Table 1. The ITE parking generation documentation is attached.

Table 1  
Parking Generation

Land Use	ITE Code	Intensity	Parking Generation Rate	Total Parking Required
Multifamily Housing - 1 BR (Low-Rise)	217	112 Units	$P=0.88(X)+1.19$	100

Source: Institute of Transportation Engineers (ITE), Parking Generation Manual, 6th Edition

The proposed change from hotel to multifamily will not result in a need for additional parking as the results from the *ITE Parking Generation Manual, 6<sup>th</sup> Edition* indicate less required parking than is currently provided by the existing site. The existing parking is sufficient for the project.

If you have any questions, please let me know.

Sincerely,



Lisa S. Bernstein, PE  
Attachments

This item has been electronically signed and sealed by Lisa Susan Bernstein, P.E. on the date below using a Digital Signature.

Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.



Digitally signed  
by Lisa S  
Bernstein  
Date:  
2024.01.04  
11:41:15-05'00'

# Land Use: 217 Multifamily Housing— 1 BR (Low-Rise)

## Description

Low-rise multifamily housing with one bedroom is a residential building with two or three floors (levels) of residence that consist entirely of 1-bedroom dwelling units. A studio or micro-apartment or condominium is treated as a 1-bedroom dwelling unit for this land use.

For this land use, a studio apartment is defined as a self-contained dwelling unit in which the living room, bedroom, and kitchen are combined into a single room. A micro-apartment is defined as a single-occupant studio apartment with a compact design that typically ranges between approximately 200 and 400 gross square feet.

Various configurations can fit this description, including the following:

- Walkup apartment or multiplex-access to the individual dwelling units is typically internal to the structure and provided through a shared entry, stairway, and hallway
- Mansion apartment-several dwelling units within what appears from the outside to be a single-family dwelling unit
- Stacked townhouse-designed to match the external appearance of a townhouse, but which have dwelling units that share both floors and walls and with access through a central entry and stairway

## Land Use Subcategory

Data are separated into two subcategories for this land use: (1) not close to rail transit and (2) close to rail transit. A site is considered close to rail transit if the walking distance between the residential site entrance and the closest rail transit station entrance is ½ mile or less.

## Time-of-Day Distribution for Parking Demand

The current database for this land use does not have sufficient data to produce a detailed, hour-by-hour distribution of parking demand from which the analyst can determine a peak period of parking demand. Based on the time periods for which data were collected for this land use and on a review of comparable land uses with hour-by-hour parking demand data, the presumed peak period for parking demand for this land use is between late-evening and early-morning.

## Additional Data

The average parking supply ratios for the study sites with parking supply information are shown in the table below.

Setting	Proximity to Rail Transit	Parking Supply Per Dwelling Unit
Dense Multi-Use Urban	Within ½ mile of rail transit	0.47 (3 sites)
	Not within ½ mile of rail transit	0.59 (4 sites)
General Urban/Suburban	Within ½ mile of rail transit	1.08 (5 sites)
	Not within ½ mile of rail transit	1.35 (13 sites)

The average peak parking occupancy at the seven sites in a dense multi-use urban setting is 97 percent. The average peak parking occupancy at the 18 sites in a general urban/suburban setting is 70 percent.

The sites were surveyed in the 2000s, the 2010s, and the 2020s in California, Colorado, District of Columbia, Massachusetts, Oregon, and Wisconsin.

## Source Numbers

419, 535, 536, 537, 544, 545, 579, 584, 585, 608, 610, 617

# Multifamily Housing - 1 BR (Low-Rise) Not Close to Rail Transit (217)

Peak Period Parking Demand vs: Dwelling Units

On a: Weekday (Monday - Friday)

Setting/Location: General Urban/Suburban

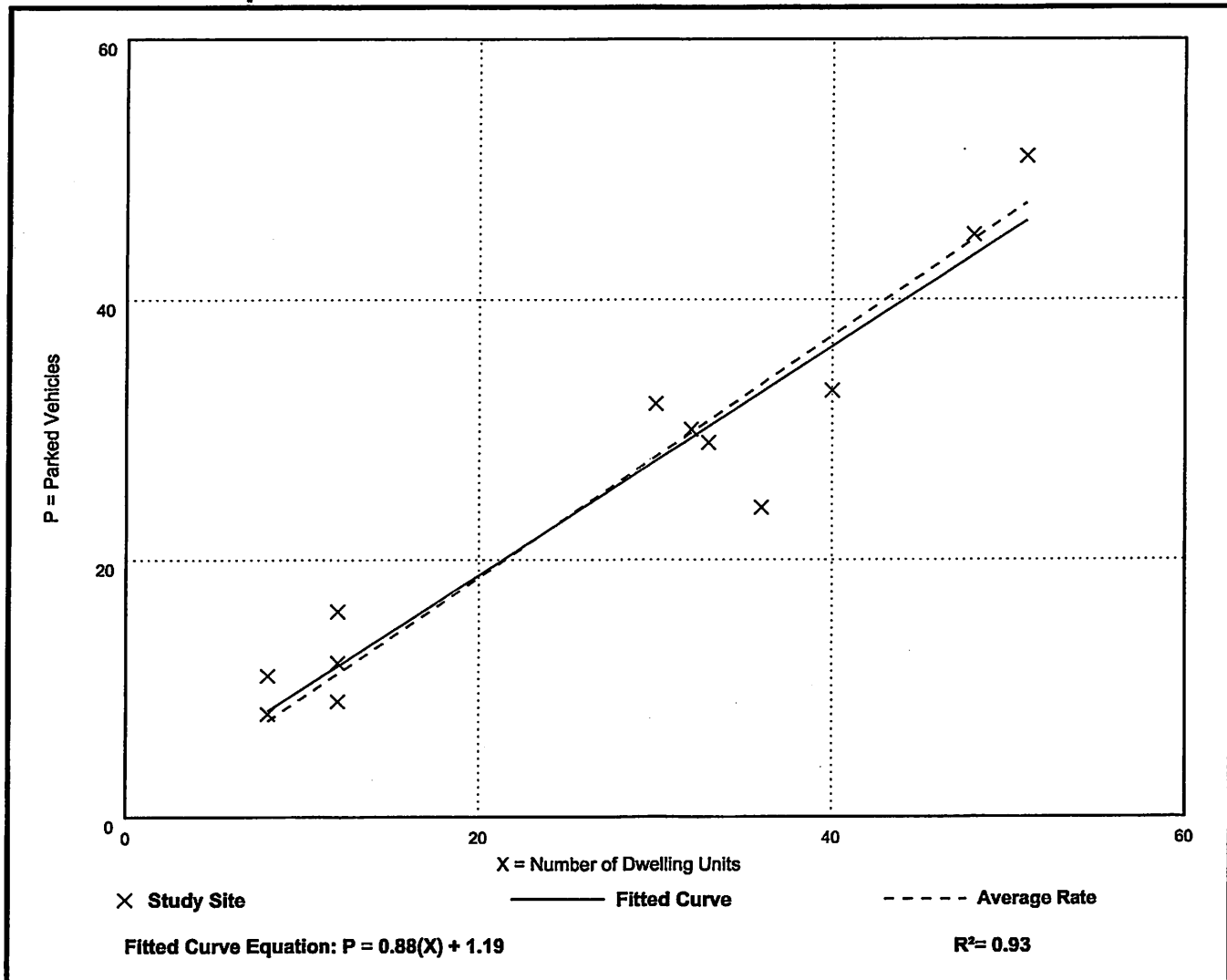
Number of Studies: 14

Avg. Num. of Dwelling Units: 25

## Peak Period Parking Demand per Dwelling Unit

Average Rate	Range of Rates	33rd / 85th Percentile	95% Confidence Interval	Standard Deviation (Coeff. of Variation)
0.93	0.67 - 1.38	0.88 / 1.27	***	0.16 ( 17% )

## Data Plot and Equation



## **EXHIBIT B**

# LISA S. BERNSTEIN, PE

— TRAFFIC ENGINEER —

Mr. Alex Nahabetian  
IMF Management Doral, LLC  
1212 NW 82 Avenue  
Doral, Florida 33126

September 10, 2024

**Re: Traffic Statement – Parking Generation**

Project Name: Hotel Conversion to Multifamily  
Project Location: 1212 NW 82 Avenue, Doral, Florida 33126  
Project Number: 23-0206

Dear Mr. Nahabetian:

The City of Doral requested a parking study to be conducted at a similar residential complex to determine a parking rate per number of units that would be used for the proposed Hotel Conversion to Multifamily project.

The existing hotel is located at 1212 NW 82 Avenue, just north of NW 12 Street in the City of Doral. The existing 112-room hotel will be redeveloped as a 112-room multifamily residence and there will be no modifications to the existing buildings and driveways.

The multifamily residence will have 52 one bedroom-one bath units and 60 studio units.

The existing site has a total of 132 parking spaces. There are 128 regular parking spaces and four (4) ADA spaces.

## **Parking Study**

The City of Doral approved the Les Montteller residential complex, located at 450 W 49 Street in Hialeah, Florida for use in the parking study. Les Montteller has 124 units, comprised of 16 studio units, 92 one-bedroom units and 16 two-bedroom units. Les Montteller is 100% occupied. There are 150 parking spaces, 147 regular spaces and three (3) ADA spaces.

The City requested that parking data be collected on one (1) weekday, from 5:00 PM to 7:00 PM and one (1) weekend, from 11:00 AM to 1:00 PM. The data was requested to be collected in 15-minute increments. The approval email from the City of Doral is attached.

The data was collected on Thursday, August 22, 2024, and on Saturday, August 24, 2024, after the school year had started.

Table 1 is the data from Thursday, August 22, 2024, from 5:00 PM to 7:00 PM. The data shows that out of the 150 total spaces the maximum occupancy was 74 spaces (49%).

**Table 1**  
**Parking Accumulation Study, Les Monttelleri 850 W 49 Street, Hialeah, Florida**  
**Thursday, August 22, 2024**

Time	Les Montellier			Percent Occupied			Spaces Available		
	Regular	HC	Total	Regular	HC	Total	Regular	HC	Total
5:00 PM	54	2	56	37%	67%	37%	93	1	94
5:15 PM	54	2	56	37%	67%	37%	93	1	94
5:30 PM	60	2	62	41%	67%	41%	87	1	88
5:45 PM	58	2	60	39%	67%	40%	89	1	90
6:00 PM	57	2	59	39%	67%	39%	90	1	91
6:15 PM	64	2	66	44%	67%	44%	83	1	84
6:30 PM	72	2	74	49%	67%	49%	75	1	76
6:45 PM	69	2	71	47%	67%	47%	78	1	79
7:00 PM	72	2	74	49%	67%	49%	75	1	76
<b>Total Spaces</b>	<b>147</b>	<b>3</b>	<b>150</b>						

Table 2 is the data from Saturday, August 24, 2024, from 11:00 AM to 1:00 PM. The data shows that out of the 150 total spaces the maximum occupancy was 92 spaces (61%). The field data is attached to this letter.

**Table 2**  
**Parking Accumulation Study, Les Monttelleri 850 W 49 Street, Hialeah, Florida**  
**Saturday, August 24, 2024**

Time	Les Montellier			Percent Occupied			Spaces Available		
	Regular	HC	Total	Regular	HC	Total	Regular	HC	Total
11:00 AM	65	2	67	44%	67%	45%	82	1	83
11:15 AM	70	2	72	48%	67%	48%	77	1	78
11:30 AM	81	3	84	55%	100%	56%	66	0	66
11:45 AM	76	3	79	52%	100%	53%	71	0	71
12:00 PM	80	3	83	54%	100%	55%	67	0	67
12:15 PM	83	3	86	56%	100%	57%	64	0	64
12:30 PM	85	2	87	58%	67%	58%	62	1	63
12:45 PM	90	2	92	61%	67%	61%	57	1	58
1:00 PM	87	2	89	59%	67%	59%	60	1	61
<b>Total Spaces</b>	<b>147</b>	<b>3</b>	<b>150</b>						



### Parking Rate Calculations

The parking rate is calculated using the data from Les Montteller. Les Montteller has 124 units and 150 parking of spaces (147 regular spaces and 3 ADA spaces). The actual supply of parking spaces yields a parking rate of 1.21 spaces per unit.

Using the data obtained from the parking study, during the weekday peak hour, the maximum occupancy was 74 spaces, using 49% of the available parking. The parking data showed that the total amount of available parking was never fully parking during the required study periods.

Using the data obtained from the parking study, during the weekend study hour, the maximum occupancy was 92 spaces, using 61% of the available parking. The parking data showed that the total amount of available parking was never fully parking during the required study periods.

Tables 3 and 4 show the parking rates from the data collected for the weekday and weekend parking study periods, respectively.

**Table 3**  
**Parking Rate Calculations - Weekday**

Actual Parking Supply		Parking Study	
Total Spaces/Total Units		Total Occupied Spaces/Total Units	
Total Spaces	150	Total Spaces	74
Total Units	124	Total Units	124
Parking Rate	1.21	Parking Rate	0.60

**Table 4**  
**Parking Rate Calculations - Weekend**

Actual Parking Supply		Parking Study	
Total Spaces/Total Units		Total Occupied Spaces/Total Units	
Total Spaces	150	Total Spaces	92
Total Units	124	Total Units	124
Parking Rate	1.21	Parking Rate	0.74

If the maximum calculated parking rate, 0.74, is applied to the 112 units in the Doral project, the required number of parking spaces would be 83.

The Doral project has 132 existing parking spaces (128 regular and 4 ADA) and 112 units. The actual supply of parking spaces yields a parking rate of 1.18 spaces per unit which exceeds the maximum rate as determined by the data collected at Les Montteller.

Sincerely,



Lisa S. Bernstein, PE  
Attachments

## Comments Review Questions - 1212 NW 82nd Ave

Bethany Goode <bgoode@abrams-law.com>

Tue 7/9/2024 5:31 PM

To: Lisa Bernstein <lisa.bernstein@lsbpe.net>

Cc: Ryan Abrams <rabrams@abrams-law.com>

Please see correspondence below from Edna Sibila, Transportation Manager, approving the comparator property.

Sincerely,

### Bethany Goode

Legal Assistant

Abrams Law Firm, P.A.

888 SE 3<sup>rd</sup> Ave., Suite 400

Fort Lauderdale, FL 33316

Office: 954-332-2358

Email: [bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)

Website: [www.abrams-law.com](http://www.abrams-law.com)

---

**From:** Edna Sibila (PW) <Edna.Sibila@cityofdoral.com>

**Sent:** Tuesday, July 9, 2024 3:20 PM

**To:** Bethany Goode <bgoode@abrams-law.com>; Ryan Abrams <rabrams@abrams-law.com>

**Cc:** Sydney Satz <ssatz@abrams-law.com>; Carlos Arroyo (PW) <Carlos.Arroyo@cityofdoral.com>; Stephanie Puglia (PZ) <Stephanie.Puglia@cityofdoral.com>; Michelle Lopez (PZ) <Michelle.Lopez@cityofdoral.com>; Alex Nahabetian <alexnahabetian@gmail.com>; Marcelo Aramendi <maramendi@aramarinvestments.com>

**Subject:** RE: Comments Review Questions - 1212 NW 82nd Ave

Good Afternoon Bethany,

I looked at the Les Montteller condominium located at 850 W 49 Street in Hialeah and this location is good as a surrogate site for the parking analysis. Let me know if you need additional information.

Regards,

### Edna Sibila

*Transportation Manager*

### City of Doral

8401 NW 53<sup>rd</sup> Terrace

Doral, FL 33166

T (305) 593-6740 Ext. 6017

F (305) 593-6617

[Edna.sibila@cityofdoral.com](mailto:Edna.sibila@cityofdoral.com)

[www.cityofdoral.com](http://www.cityofdoral.com)

Connect with us on [X](#), [Facebook](#) and [Instagram](#) !



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**From:** Bethany Goode <bgoode@abrams-law.com>

**Sent:** Tuesday, July 9, 2024 10:10 AM

**To:** Ryan Abrams <rabrams@abrams-law.com>; Edna Sibila (PW) <Edna.Sibila@cityofdoral.com>

**Cc:** Sydney Satz <ssatz@abrams-law.com>; Carlos Arroyo (PW) <Carlos.Arroyo@cityofdoral.com>; Stephanie Puglia (PZ) <Stephanie.Puglia@cityofdoral.com>; Michelle Lopez (PZ) <Michelle.Lopez@cityofdoral.com>; Alex Nahabetian <alexnahabetian@gmail.com>; Marcelo Aramendi <maramendi@aramarinvestments.com>

**Subject:** Re: Comments Review Questions - 1212 NW 82nd Ave

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good Morning Edna,

I tried calling you but unfortunately was unable to reach you. Please advise if the property Les Montteller located at 850 W 49 Street, Hialeah is sufficient to complete the parking analysis. Thank you.

Sincerely,

**Bethany Goode**

Legal Assistant

Abrams Law Firm, P.A.

888 SE 3<sup>rd</sup> Ave., Suite 400

Fort Lauderdale, FL 33316

Office: 954-332-2358

Email: [bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)

Website: [www.abrams-law.com](http://www.abrams-law.com)

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**From:** Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Sent:** Wednesday, July 3, 2024 4:30 PM

**To:** Ryan Abrams <[rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)>; Edna Sibila (PW) <[Edna.Sibila@cityofdoral.com](mailto:Edna.Sibila@cityofdoral.com)>

**Cc:** Sydney Satz <[ssatz@abrams-law.com](mailto:ssatz@abrams-law.com)>; Carlos Arroyo (PW) <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>; Stephanie Puglia (PZ) <[Stephanie.Puglia@cityofdoral.com](mailto:Stephanie.Puglia@cityofdoral.com)>; Michelle Lopez (PZ) <[michelle.lopez@cityofdoral.com](mailto:michelle.lopez@cityofdoral.com)>; Alex Nahabetian <[alexnahabetian@gmail.com](mailto:alexnahabetian@gmail.com)>; Marcelo Aramendi <[maramendi@aramarinvestments.com](mailto:maramendi@aramarinvestments.com)>

**Subject:** Re: Comments Review Questions - 1212 NW 82nd Ave

Good Afternoon Edna,

Happy Wednesday! Following up on the email below. Please advise if the property Les Montteller located at 850 W 49 Street, Hialeah is sufficient to complete the parking analysis. Thank you.

Sincerely,

**Bethany Goode**

Legal Assistant

Abrams Law Firm, P.A.

888 SE 3<sup>rd</sup> Ave., Suite 400

Fort Lauderdale, FL 33316

Office: 954-332-2358

Email: [bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)

Website: [www.abrams-law.com](http://www.abrams-law.com)

---

**From:** Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Sent:** Tuesday, June 25, 2024 11:40 AM

**To:** Ryan Abrams <[rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)>; Edna Sibila (PW) <[Edna.Sibila@cityofdoral.com](mailto:Edna.Sibila@cityofdoral.com)>

**Cc:** Sydney Satz <[ssatz@abrams-law.com](mailto:ssatz@abrams-law.com)>; Carlos Arroyo (PW) <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>; Stephanie Puglia (PZ) <[Stephanie.Puglia@cityofdoral.com](mailto:Stephanie.Puglia@cityofdoral.com)>; Michelle Lopez (PZ) <[michelle.lopez@cityofdoral.com](mailto:michelle.lopez@cityofdoral.com)>; Alex Nahabetian <[alexnahabetian@gmail.com](mailto:alexnahabetian@gmail.com)>; Marcelo Aramendi <[maramendi@aramarinvestments.com](mailto:maramendi@aramarinvestments.com)>

**Subject:** Re: Comments Review Questions - 1212 NW 82nd Ave

Good Morning Edna,

I hope this email finds you well. Please advise if the property Les Monttellier located at 850 W 49 Street, Hialeah is sufficient to complete the parking analysis. Thank you.

Sincerely,

**Bethany Goode**

Legal Assistant

Abrams Law Firm, P.A.

888 SE 3<sup>rd</sup> Ave., Suite 400

Fort Lauderdale, FL 33316

Office: 954-332-2358

Email: [bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)

Website: [www.abrams-law.com](http://www.abrams-law.com)

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**From:** Ryan Abrams <[rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)>

**Sent:** Thursday, June 6, 2024 11:58 PM

**To:** Edna Sibila (PW) <[Edna.Sibila@cityofdoral.com](mailto:Edna.Sibila@cityofdoral.com)>; Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Cc:** Sydney Satz <[ssatz@abrams-law.com](mailto:ssatz@abrams-law.com)>; Carlos Arroyo (PW) <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>; Stephanie Puglia (PZ) <[Stephanie.Puglia@cityofdoral.com](mailto:Stephanie.Puglia@cityofdoral.com)>; Michelle Lopez (PZ) <[Michelle.Lopez@cityofdoral.com](mailto:Michelle.Lopez@cityofdoral.com)>; Alex Nahabetian <[alexnahabetian@gmail.com](mailto:alexnahabetian@gmail.com)>; Marcelo Aramendi <[maramendi@aramarinvestments.com](mailto:maramendi@aramarinvestments.com)>; Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Subject:** RE: Comments Review Questions - 1212 NW 82nd Ave

Thank you!

Sincerely,

**Ryan A. Abrams, Esq.**

Founder and Managing Attorney

Abrams Law Firm, P.A.

888 SE 3<sup>rd</sup> Ave., Suite 400

Fort Lauderdale, FL 33316

Office: 954-332-2358

Direct: 954-406-0280

Cell: 305-775-5958

Email: [rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)

Website: [www.abrams-law.com](http://www.abrams-law.com)

**From:** Edna Sibila (PW) <[Edna.Sibila@cityofdoral.com](mailto:Edna.Sibila@cityofdoral.com)>

**Sent:** Thursday, June 6, 2024 10:37 AM

**To:** Ryan Abrams <[rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)>; Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Cc:** Sydney Satz <[ssatz@abrams-law.com](mailto:ssatz@abrams-law.com)>; Carlos Arroyo (PW) <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>; Stephanie Puglia (PZ) <[Stephanie.Puglia@cityofdoral.com](mailto:Stephanie.Puglia@cityofdoral.com)>; Michelle Lopez (PZ) <[Michelle.Lopez@cityofdoral.com](mailto:Michelle.Lopez@cityofdoral.com)>; Alex Nahabetian <[alexnahabetian@gmail.com](mailto:alexnahabetian@gmail.com)>; Marcelo Aramendi <[maramendi@aramarinvestments.com](mailto:maramendi@aramarinvestments.com)>; Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Subject:** RE: Comments Review Questions - 1212 NW 82nd Ave

Good Morning,

Please see responses below. if you have any questions let me know.

Regards,

**Edna Sibila**

*Transportation Manager*

**City of Doral**

8401 NW 53<sup>rd</sup> Terrace

Doral, FL 33166

T (305) 593-6740 Ext. 6017

F (305) 593-6617

[Edna.sibila@cityofdoral.com](mailto:Edna.sibila@cityofdoral.com)

[www.cityofdoral.com](http://www.cityofdoral.com)

Connect with us on [X](#), [Facebook](#) and [Instagram](#) !



---

**From:** Ryan Abrams <[rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)>

**Sent:** Tuesday, June 4, 2024 4:39 PM

**To:** Edna Sibila (PW) <[Edna.Sibila@cityofdoral.com](mailto:Edna.Sibila@cityofdoral.com)>; Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Cc:** Sydney Satz <[ssatz@abrams-law.com](mailto:ssatz@abrams-law.com)>; Carlos Arroyo (PW) <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>; Stephanie Puglia (PZ) <[Stephanie.Puglia@cityofdoral.com](mailto:Stephanie.Puglia@cityofdoral.com)>; Michelle Lopez (PZ) <[Michelle.Lopez@cityofdoral.com](mailto:Michelle.Lopez@cityofdoral.com)>; Alex Nahabetian <[alexnahabetian@gmail.com](mailto:alexnahabetian@gmail.com)>; Marcelo Aramendi <[maramendi@aramarinvestments.com](mailto:maramendi@aramarinvestments.com)>; Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Subject:** Re: Comments Review Questions - 1212 NW 82nd Ave

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good afternoon Edna,

I am touching base regarding this project. We had a zoom meeting last week where the attached parking study was discussed. There was a suggestion from your department that a comparator site should be selected for a control/comparison, and that a greater study period should be used. In order to proceed to satisfy the comment, our traffic engineer has requested the following to be clarified/confirmed by staff:

1. What is the minimum time period staff would like used for the study? - **Provide data for afternoon (5-7PM) and weekend midday (11 AM -1 PM)**
2. what is the minimum frequency of testing (for example, every 15 minutes, 30 minutes, etc)? **Every 15 minutes**
3. As for the comparator site, will staff want to approve of the comparator location before time/money is spent collecting data? **Provide location to the City prior to begin effort to review and ensure they are comparable.**

Please advise at your earliest convenience. Thanks in advance.

Sincerely,

**Ryan A. Abrams, Esq.**

Founder and Managing Attorney

Abrams Law Firm, P.A.

888 SE 3<sup>rd</sup> Ave., Suite 400

Fort Lauderdale, FL 33316

Office: 954-332-2358

Direct: 954-406-0280

Cell: 305-775-5958

Email: [rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)

Website: [www.abrams-law.com](http://www.abrams-law.com)

---

**From:** Edna Sibila (PW) <[Edna.Sibila@cityofdoral.com](mailto:Edna.Sibila@cityofdoral.com)>

**Sent:** Friday, May 17, 2024 3:40 PM

**To:** Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>

**Cc:** Ryan Abrams <[rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)>; Sydney Satz <[ssatz@abrams-law.com](mailto:ssatz@abrams-law.com)>; Carlos Arroyo (PW) <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>

**Subject:** RE: Comments Review Questions - 1212 NW 82nd Ave

Good Afternoon Bethany,

Attached are the comments from public works in regard to the trip generation/parking analysis for permit PLAN-2403-0077. As for the parking analysis, we recommend collecting and provide a parking data assessment from a surrogate site (similar use) to confirm that the existing 132 parking spaces are sufficient. Our concern is that the ITE is underestimating the number of required parking spaces, and it does not coincide with our City code. This site does not provide an area that can be used as an overflow parking when needed which would lead to an issue and we can't have vehicles using business nearby or public right of way as parking. The data can be for the weekday AM and PM peak periods. If you have a site in mind send me an email and we can discuss if this location is suitable for the study. If you have any questions or want to schedule a meeting let me know.

Regards,

**Edna Sibila**

*Transportation Manager*

**City of Doral**

8401 NW 53<sup>rd</sup> Terrace

Doral, FL 33166

T (305) 593-6740 Ext. 6017

F (305) 593-6617

[Edna.sibila@cityofdoral.com](mailto:Edna.sibila@cityofdoral.com)

[www.cityofdoral.com](http://www.cityofdoral.com)

Connect with us on [X](#), [Facebook](#) and [Instagram](#) !



---

**From:** Carlos Arroyo (PW) <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>  
**Sent:** Tuesday, May 14, 2024 2:18 PM  
**To:** Edna Sibila (PW) <[Edna.Sibila@cityofdoral.com](mailto:Edna.Sibila@cityofdoral.com)>  
**Cc:** Rita Carbonell (PW) <[Rita.Carbonell@cityofdoral.com](mailto:Rita.Carbonell@cityofdoral.com)>  
**Subject:** Fwd: Comments Review Questions - 1212 NW 82nd Ave

Edna,

Please see below. Please advise if you can address this comments. Thank you.

Respectfully,

Carlos Arroyo, CFM  
Public Works Director

City of Doral  
8401 NW 53rd Terrace  
Doral, FL 33166  
T (305) 593-6740 Ext. 6009  
F (305) 593-6617  
[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)  
[www.cityofdoral.com](http://www.cityofdoral.com)

Sent from my iPad

Begin forwarded message:

**From:** Bethany Goode <[bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)>  
**Date:** May 14, 2024 at 1:27:45 PM EDT  
**To:** "Carlos Arroyo (PW)" <[Carlos.Arroyo@cityofdoral.com](mailto:Carlos.Arroyo@cityofdoral.com)>  
**Cc:** "Rita Carbonell (PW)" <[Rita.Carbonell@cityofdoral.com](mailto:Rita.Carbonell@cityofdoral.com)>, Ryan Abrams <[rabrams@abrams-law.com](mailto:rabrams@abrams-law.com)>, Sydney Satz <[ssatz@abrams-law.com](mailto:ssatz@abrams-law.com)>  
**Subject:** Comments Review Questions - 1212 NW 82nd Ave

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good Afternoon Mr. Arroyo,

We have received the first review of comments for the project associated with the property located at 1212 NW 82nd Ave. I have attached the letter for you to reference. While reviewing, the engineer who conducted the traffic study had a few questions. Would you please be able to provide clarification and answers to the questions listed below? Thank you for your time in advance.

Comment #21 states to coordinate with Public Works Director to see if the ITE is valid. For comment #29, it asks to provide justification which was provided by the ITE, but this was not accepted. Could you please clarify what is needed?



Questions from the engineer:

1. Do they have a standard methodology that is used for the study?
2. Do they need a written "approved" methodology from us?
3. Do they need to approve the location and do they need more than one?
4. What times do they need the counts, AM/PM Peak Hour, count intervals (i.e. every hour) and for how many days?
5. Any other requirements for the parking study.

Sincerely,

**Bethany Goode**

Legal Assistant

Abrams Law Firm, P.A.

888 SE 3<sup>rd</sup> Ave., Suite 400

Fort Lauderdale, FL 33316

Office: 954-332-2358

Email: [bgoode@abrams-law.com](mailto:bgoode@abrams-law.com)

Website: [www.abrams-law.com](http://www.abrams-law.com)

Prepared by National Data & Surveying Services

## Parking Study

**Location:** 850 W 49th St

**City:** Hialeah, FL

**Date:** 8/22/2024

**Day:** Thursday

PKG-001		
Space Type	Regular	Handicap
Space	147	3
5:00 PM	54	2
5:15 PM	54	2
5:30 PM	60	2
5:45 PM	58	2
6:00 PM	57	2
6:15 PM	64	2
6:30 PM	72	2
6:45 PM	69	2
7:00 PM	72	2

Prepared by National Data & Surveying Services

## Parking Study

**Location:** 850 W 49th St

**City:** Hialeah, FL

**Date:** 8/24/2024

**Day:** Saturday

PKG-001		
Space Type	Regular	Handicap
Space	147	3
11:00 AM	65	2
11:15 AM	70	2
11:30 AM	81	3
11:45 AM	76	3
12:00 PM	80	3
12:15 PM	83	3
12:30 PM	85	2
12:45 PM	90	2
1:00 PM	87	2



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

## PUBLIC HEARING APPLICATION / Administrative Review Application

## PLANNING AND ZONING DEPARTMENT

Please check one:

- ☒ CITY COUNCIL  
☐ ADMINISTRATIVE REVIEW

### OFFICIAL USE ONLY

Application No.: LAND-2503-0024

Date Received: **RECEIVED**  
By puglias at 9:00 am, Mar 10, 2025

### 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 checked="" 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 type="checkbox"/> Other _____   |

**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) Abrams Law Firm c/o Ryan Abrams, Esq. on behalf of Owner, IMF Doral, LLC		
Mailing Address 888 SE 3rd Avenue, Suite 400	City, State, Zip Fort Lauderdale Florida 33316	Telephone (954)332-2358 Fax Email: admin@abrams-law.com
Name of Owner IMF Doral LLC		
Mailing Address 1212 NW 82nd Avenue	City, State, Zip Doral Florida 33126	Telephone (954)332-2358 Fax Email: admin@abrams-law.com

## 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) 35-3034-047-0001 et. al.

Address 1212 NW 82nd Ave Doral, Florida 33126

Lot(s) P Block \_\_\_\_\_ Section \_\_\_\_\_ Plat Book No. 118 Page No. 70

FINISHED FLOOR ELEVATION (If applicable): \_\_\_\_\_ FLOOD ZONE: \_\_\_\_\_

B. ADDRESS (If number has been assigned) \_\_\_\_\_

C. SIZE OF PROPERTY \_\_\_\_\_ ft. X \_\_\_\_\_ ft. = 209601.2 sq. ft.; 4.81 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.

See attached Exhibit "A" for legal description.

E. DATE SUBJECT PROPERTY WAS ACQUIRED \_\_\_\_\_

## APPLICANT'S REQUEST:

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

See Exhibit B, attached.

## 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.)

See Exhibit B, attached.

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 6 COPIES (AND A PDF) OF 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.

Mar 7, 2025 Ryan Abrams / \_\_\_\_\_  
Date Applicant's Signature Print Name Ryan Abrams, Esq.  
/\_\_\_\_\_  
Date Applicant's Signature (if more than one) Print Name

## PUBLIC HEARING APPLICATION

## OWNER AFFIDAVIT

I/We IMF Doral LLC c/o Alex Nahabetian as Owner (s) of Lot (s) TRACT "P"

Block \_\_\_\_\_ Section \_\_\_\_\_ PB/PG 118/70

of property which is located at 1212 NW 82nd Ave Doral, Florida 33126

desire to file an application for a public hearing before the ☒ City Council ☐ Administrative Review, and I/We do understand and agree as follows:

1. That the application for a variance 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 section \_\_\_\_.
3. That the requirements of the zoning code, Miami-Dade County Ordinances, the South Florida Building Code, 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 zoning code are those that have been specified in the written 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 Abrams Law Firm c/o Ryan Abrams, Esq. 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.

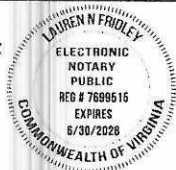
Owner's Name IMF Doral, LLC c/o Alex Nahabetian Signature [Signature] Date 3/7/2025

Owner's Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

Notary to Owner:

Applicant's Name Ryan Abrams, Esq. Signature Ryan Abrams Date 3/7/2025

Notary to Applicant:



Notary Acknowledgment Continued on Next Page  
Completed via Remote Online Notarization using  
two-way Audio/Video technology

### **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: IMF Doral LLC

<u>NAME AND ADDRESS</u>	<u>Percentage of Stock</u>
<u>Marcelo Aramendi</u>	<u>50%</u>
<u>Qua Integral Services LLC c/o Alex Nahabetian</u>	<u>50%</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>
<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:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

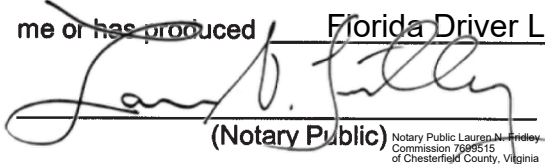
**NOTICE:** For changes of ownership or changes in purchase contracts after the date of the application, but prior to the date of final public hearing, a supplemental disclosure of interest is required.

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

Signature: Ryan Abrams  
Ryan Abrams (Mar 7, 2025 18:51 EST)

(Applicant)

Sworn to and subscribed before me this 7th day of March, 2025. Affiant is personally known to me or has produced Florida Driver License as identification.

  
(Notary Public) Notary Public Lauren N. Fridley  
Commission 7699515  
of Chesterfield County, Virginia

☒ online notary ; ☐ physical appearance

My commission expires 06/30/2028



Completed via Remote Online Notarization using two-way Audio/Video technology

\*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**

## **Legal Description for Administrative Site Plan Application**

### **APPLICANT / REPRESENTATIVE**

IMF DORAL LLC / Ryan A. Abrams, Esq.

### **LEGAL DESCRIPTION OF SUBJECT AREA**

#### **GROSS LAND AREA DESCRIPTION**

BEING A PORTION OF TRACT "P", MIAMI INTERNATIONAL COMMERCE CENTER, SECTION 5, ACCORDING TO THE PLAT THEREOF RECORDED IN PLAT BOOK 118, AT PAGE 70, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA, BEING MORE FULLY DESCRIBED AS FOLLOWS:

- COMMENCE AT THE SOUTHWEST CORNER OF TRACT "S" AS SHOWN ON SAID PLAT OF MIAMI INTERNATIONAL COMMERCE CENTER, SECTION 5, SAID SOUTHWEST CORNER LYING ON THE NORTHERLY RIGHT OF WAY LINE OF NW 12<sup>TH</sup> STREET; THE FOLLOWING THREE (3) COURSES BEING ALONG SAID NORTHERLY RIGHT-OF-WAY LINE, SAID NORTHERLY RIGHT -OF-WAY LINE ALSO BEING THE SOUTHERLY LINE OF SAID TRACT "P"; (1) THENCE SOUTH 89° 58'33" WEST FOR 292.61 FEET TO THE POINT OF BEGINNING OF THE HEREINAFTER DESCRIBED PARCEL OF LAND; (2) THENCE CONTINUE SOUTH 89 °58'33" WEST FOR 45.24 FEET TO A POINT OF CURVATURE; (3) THENCE 00'02'10", FOR AN ARC DISTANCE OF 1.76 FEET TO THE SOUTHWEST CORNER OF SAID TRACT "P"; THENCE NORTH 00 °01'27" WEST ALONG THE WESTERLY LINE OF SAID TRACT "p", FOR 504.79 FEET TO A POINT ON THE SOUTHERLY RIGHT-OF-WAY LINE OF SCL RAILROAD EASEMENT, SAID EASEMENT RECORDED IN DEED BOOK 4366 AT PAGE 525, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA; THENCE NORTH 89°58'33" EAST ALONG SAID SOUTHERLY RIGHT-OF-WAY LINE, SAID RIGHT-OF-WAY LINE BEING PARALLEL WITH AND 100 FEET SOUTH OF THE NORTHERLY LINE OF SAID TRACT "P", FOR 380 FEET TO A POINT ON THE WESTLY RIGHT OF WAY LINE OF NW 82<sup>ND</sup> AVENUE; THENCE SOUTH 01'14'09" EAST ALONG SAID RIGHT OF WAY LINE, SAID RIGHT OF WAY LINE ALSO BEING THE EASTERLY LINE OF SAID TRACT "P", FOR 362.87 FEET; THENCE SOUTH 89 °58'33" WEST ALONG A LINE PARALLEL WITH AND 142 FEET NORTH OF THE SOUTHERLY LINE OF SAID TRACT "P", FOR 340.67 FEET; THENCE SOUTH 00'01'27 EAST ALONG A LINE PARALLEL WITH AND 47 FEET EAST OF THE WEST LINE OF SAID TRACT "P", FOR 142 FEET TO THE POINT OF BEGINNING.

- THE NORTH 100 FEET OF TRACT "P", MIAMI INTERNATIONAL COMMERCE CENTER, SECTION 5, ACCORDING TO THE PLAT THEREOF RECORDED IN PLAT BOOK 118, AT PAGE 70, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA.
- THAT PORTION OF NW 82<sup>ND</sup> AVENUE DESCRIBED AS FOLLOWS: COMMENCE AT THE NORTHWEST CORNER OF TRACT "P", MIAMI INTERNATIONAL COMMERCE CENTER, SECTION 5, ACCORDING TO THE PLAT THEREOF RECORDED IN PLAT BOOK 118, AT PAGE 70, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA, THENCE NORTH 89°58'33" EAST TO THE CENTERLINE OF NW 82<sup>ND</sup> AVENUE, THENCE SOUTH 01°14'09" EAST ALONG SAID CENTERLINE OF NW 82<sup>ND</sup> AVENUE, THENCE SOUTH 89°58'33" WEST TO THE NORTHEAST CORNER OF TRACT "18-A", MIAMI INTERNATIONAL COMMERCE CENTER, SECTION 18, ACCORDING TO THE PLAT THEREOF RECORDED IN PLAT BOOK 147, PAGE 44, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA, THENCE NORTH 01°33'17" EAST ALONG THE EASTERN LINE OF SAID TRACT "P", TO THE POINT OF BEGINNING.
- THAT PORTION OF NW 12<sup>TH</sup> STREET DESCRIBED AS FOLLOWS: COMMENCE AT THE SOUTHWEST CORNER OF PARCEL "P", THENCE SOUTH 0°20'34" EAST FOR 50 FEET TO THE CENTERLINE OF NW 12 STREET, THENCE NORTH 89°39'26" EAST FOR 45.24 FEET, THENCE NORTH 0°20'34" EAST FOR 50 FEET, THENCE SOUTH 89°39'26" WEST FOR 45.24 FEET, TO THE POINT OF BEGINNING.