AGENDA
MIAMI-DADE COUNTY PLANNING ADVISORY BOARD
ACTING AS THE LOCAL PLANNING AGENCY
PUBLIC HEARING ON
MAY 2016 CYCLE STANDARD APPLICATIONS TO AMEND
THE COMPREHENSIVE DEVELOPMENT MASTER PLAN

10:00 AM – Wednesday, December 7, 2016
Miami-Dade County Commission Chamber
111 NW 1 Street, Miami, Florida 33128

1. Opening Remarks.

Role of the Planning Advisory Board, acting as Local Planning Agency, and Purpose of this Hearing – William Riley, Chairperson, Planning Advisory Board

Comprehensive Development Master Plan (CDMP) Amendment Process: May 2016 Cycle Applications and Review of Relevant Documents – Jerry Bell, AICP, Assistant Director for Planning Designee, Department of Regulatory and Economic Resources

HEARING OPEN TO PUBLIC COMMENTS

2. Applications to Amend the Land Use Plan Map, Text and Policies of the CDMP:

<u>Standard CDMP Land Use Plan Map Amendments</u>

- Application No. 5; International Atlantic, LLC
- Application No. 6; The Graham Companies
- Application No. 7; Kendall Associates I, LLLP

PUBLIC HEARING CLOSED

3. Planning Advisory Board Action.

Adoption by the Planning Advisory Board, by Resolution, of its recommendations to the Miami-Dade Board of County Commissioners, regarding the May 2016 Cycle Standard CDMP Amendment Applications.

4. Old Business

5. New Business

PUBLIC HEARING PROCEDURES

Persons wishing to speak, including applicants and their representatives, must sign in and indicate which application(s) they wish to address before entering the public hearing. Staff will be available to assist with this process.

Applications will be heard in numeric order. For each application, the Department of Regulatory and Economic Resources (Department) will summarize the application, the Department's recommendation and the recommendations of the affected Community Councils. The applicant or representative will be heard next, followed by other speakers who will be called in order of sign-in.

At the conclusion of the public hearing, the Planning Advisory Board, acting as the Local Planning Agency, will adopt by resolution its recommendations to the Board of County Commissioners.

NOTICE OF COUNTY COMMISSION HEARING ON THE CDMP APPLICATIONS

The next public hearing to address the May 2016 Cycle Standard Applications is currently scheduled to be conducted by the Board of County Commissioners on **Wednesday, January 11, 2017, beginning at 9:30 AM** in the Commission Chamber.

RESOLUTION NO. ______

RESOLUTION OF THE MIAMI-DADE COUNTY PLANNING ADVISORY BOARD ACTING AS THE LOCAL PLANNING AGENCY (LPA) ISSUING RECOMMENDATIONS TO THE BOARD OF COUNTY COMMISSIONERS REGARDING TRANSMITTAL TO THE STATE LAND PLANNING AGENCY OF THE STANDARD MAY 2016 CYCLE STANDARD APPLICATIONS TO AMEND THE COMPREHENSIVE DEVELOPMENT MASTER PLAN, AND ADOPTING RECOMMENDATIONS AS TO SUBSEQUENT ACTION.

WHEREAS, pursuant to Chapter 163, Part II, Florida Statutes (F.S.), the Comprehensive Development Master Plan (CDMP) for Miami-Dade County was adopted by the Miami-Dade Board of County Commissioners (Commission) in November 1988; and

WHEREAS, Section 2-116.1 of the Code of Miami-Dade County, Florida, provides procedures for amending the CDMP, which comply with the requirements of the Florida Statutes referenced above; and

WHEREAS, three (3) standard applications to amend the CDMP Adopted 2020-2030 Land Use Plan map were filed by private parties on or before May 31, 2016, and are contained in the document titled "May 2016 Standard Applications to Amend the Comprehensive Development Master Plan," dated June 2016; and

WHEREAS, the Department has published its initial recommendations addressing the referenced CDMP amendment applications in the report titled "Initial Recommendations May 2016 Standard Applications to Amend the Comprehensive Development Master Plan," dated November 2016; and

WHEREAS, affected Community Councils have conducted optional public hearings pursuant to Section 2-116.1 (3)(e), Code of Miami-Dade County, Florida, to address the CDMP amendment applications that would directly impact their respective council areas and issued recommendations to the Planning Advisory Board and the Commission; and

WHEREAS, the Planning Advisory Board, acting as the Local Planning Agency, has acted in accord with the referenced State and County procedures, and has conducted a duly noticed public hearing to receive public comments and to address the referenced CDMP amendment applications, the initial recommendations of the Department, the transmittal by the Commission of standard CDMP amendments to the State Land Planning Agency and other state and regional agencies (the reviewing agencies) for review and comment, and to address the subsequent actions on standard CDMP amendments by the Commission.

NOW, THEREFORE, BE IT RESOLVED BY THE MIAMI-DADE COUNTY PLANNING ADVISORY BOARD ACTING AS THE LOCAL PLANNING AGENCY:

This Agency hereby makes the following recommendations to the Commission regarding the adoption of standard Land Use Plan map amendment Application Nos. 5, 6 and 7; and recommendations regarding the subsequent actions by the Commission.

Application Number	Applicant/Representative Location (Size) Requested Standard Amendment to the CDMP	Recommended Action on Standard Amendment
5	International Atlantic, LLC/Miguel Diaz de la Portilla, Esq. & Elinette Ruiz, Esq. North of NW 178 Street between Turnpike and I-75 (±174.827 Gross/Net) <u>Requested CDMP Amendment</u> 1. Redesignate application site on the LUP map: From: "Industrial and Office" To: "Business and Office" 2. Amend the Land Use Element text by Deleting the 0.45 Floor Area Ratio (FAR) limitation that applies to the portion of the Application area west of NW 97 Avenue; 3. Release the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of the subject property; 4. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board; and 5. Amend the Transportation Element Figure 1 – Planned Year 2030 Roadway Network; Figure 2 – Roadway Classification 2012; and Figure 3 – Roadway Functional Classification 2030.	

The motion to recommend ____ was moved by Board Member ____________________. Board Member ______________________ seconded the motion. The motion ____________________ as follows:

Carla Ascencio-Savola	Roberto Ruano
Jose Bared	Georgina Santiago
Peter DiPace	Tom Sherouse
Horacio Huembes	Alexander Soto
Javier Muñoz	Richard Tapia
Wayne Rinehart	Jesus Vasquez

Raymond Marin, Vice Chair
William Riley, Chair

Application Number	Applicant/Representative Location (Size) Requested Standard Amendment to the CDMP	Recommended Action on Standard Amendment
6	The Graham Companies/Tracy R. Slavens, Esq. & and Joseph G. Goldstein, Esq. East of the Homestead Extension Florida Turnpike (HEFT) and west of I-75 between NW 170 and NW 180 Streets (±339 Gross; ±323.6 Net) <u>Requested CDMP Amendment</u> Redesignate application site on the LUP map: 1. From: Parcel A: “Industrial and Office” (±329 acres) and Parcel B: “Business and Office” (±10 acres) To: “Business and Office” 2. Release the Declaration of Restrictions, recorded in Official Records Book 24479 at Page 0689 of the Public Records of Miami-Dade County, Florida, as it applies to portions of land within the subject property; and 3. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board.	

The motion to recommend ____ was moved by Board Member ___________________. Board Member _____________________ seconded the motion. The motion ____________________ as follows:

Carla Ascencio-Savola	Roberto Ruano
Jose Bared	Georgina Santiago
Peter DiPace	Tom Sherouse
Horacio Huembes	Alexander Soto
Javier Muñoz	Richard Tapia
Wayne Rinehart	Jesus Vasquez

Raymond Marin, Vice Chair
William Riley, Chair

Application Number	Applicant/Representative Location (Size) Requested Standard Amendment to the CDMP	Recommended Action on Standard Amendment
7	Kendall Associates I, LLLP/Stanley B. Price, Esq., Brian S. Adler, Esq., Eileen Mehta, Esq., & Leah Aaronson, Esq. Generally between SW 88 Street (N. Kendall Drive) and SW 104 Street (Killian Parkway) and between SW 127 Avenue and SW 137 Avenue (±168.13 Gross/Net) <u>Requested CDMP Amendment</u> 1. Redesignate application site on the LUP map: From: "Parks and Recreation" To: "Low-Medium Density Residential (6 to 13 dwelling units per gross acre)"; 2. Add language to the Parks and Recreation text on page I-52 of the Land Use Element; 3. Release Declaration of Restrictions recorded in Official Records Book 5891 at Page 633; and 4. Add the proffered Declaration of Restrictions in the Restrictions Table in Appendix A of the CDMP Land Use Element, if accepted by the Board of County Commissioners	

The motion to recommend ____ was moved by Board Member ___________________. Board Member _____________________ seconded the motion. The motion ____________________ as follows:

Carla Ascencio-Savola	Roberto Ruano
Jose Bared	Georgina Santiago
Peter DiPace	Tom Sherouse
Horacio Huembes	Alexander Soto
Javier Muñoz	Richard Tapia
Wayne Rinehart	Jesus Vasquez

Raymond Marin, Vice Chair
William A. Riley, Chair

The motion to adopt the foregoing resolution was moved by Board Member ________________. Board Member ________________ seconded the motion. The motion ___________ as follows:

Carla Ascencio-Savola	Robert Ruano
Jose Bared	Georgina Santiago
Peter DiPace	Tom Sherouse
Horacio Huembes	Alexander Soto
Javier Muñoz	Richard Tapia
Wayne Rinehart	Jesus Vasquez

Raymond Marin, Vice Chair
William A. Riley, Chair

The above actions were taken by the Planning Advisory Board, acting as the Local Planning Agency, at its public hearing on December 7, 2016, and are certified correct by Jack Osterholt, Executive Secretary to the Planning Advisory Board.

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Jack Osterholt, Deputy Mayor/Director
Department of Regulatory and Economic Resources

ADDITIONAL ITEMS
DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES (DEPARTMENT)
STANDARD MAY 2016 CYCLE APPLICATIONS TO AMEND THE
COMPREHENSIVE DEVELOPMENT MASTER PLAN (CDMP)

ITEM	PAGE
APPLICATION	
Miami-Dade County Department of Transportation and Public Works email comments dated November 16, 2016 addressing the Transportation Impacts Analysis for Application Nos. 5 and 6;	A-1
Document titled “CDMP Amendment Applications Nos. 5 & 6 Projected Development” submitted by Jeffrey Bercow at the Country Club of Miami Community Council 5 hearing on November 29, 2016;	A-3
Email from Jeffrey Bercow dated November 18, 2016 submitting the “Coen & Company Infrastructure Impact Analysis” report addressing Application Nos. 5 and 6;	A-7
Coen & Company Infrastructure Impact Analysis” report addressing Application Nos. 5 and 6;	A-11
Email from Jeffrey Bercow dated November 18, 2016 submitting “Analysis of Pending CDMP Applications” report prepared by Florida TaxWatch addressing Application Nos. 5 and 6;	A-45
Analysis of Pending CDMP Applications” report prepared by Florida TaxWatch addressing Application Nos. 5 and 6.	A-47

ADDITIONAL ITEMS
DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES (DEPARTMENT)
STANDARD MAY 2016 CYCLE APPLICATIONS TO AMEND THE
COMPREHENSIVE DEVELOPMENT MASTER PLAN (CDMP)

Rowe, Garett A. (RER)

From:	Stillings, Noel (RER)
Sent:	Wednesday, November 16, 2016 4:52 PM
To:	Rowe, Garett A. (RER)
Subject:	FW: May 2016 CDMP App. Nos. 5 and 6 – Upcoming public hearings/agency correspondence
Importance:	High

From: Patino, Myra (DTPW)
Sent: Wednesday, November 16, 2016 3:59 PM
To: Stillings, Noel (RER) <Noel.Stillings@miamidade.gov>
Cc: Diaz, Claudia (DTPW) <Claudia.Diaz@miamidade.gov>
Subject: RE: May 2016 CDMP App. Nos. 5 and 6 – Upcoming public hearings/agency correspondence
Importance: High

Noel-as discussed, please include the major comments mentioned over the phone regarding the diverted trips applied to the daily and AM peak, our concerns with the transportation improvements not being in place by the time they open, as well as coordination with Miami-Dade County's Traffic Signals and Signs Division for changes to the signal timings.

Here are additional, preliminary comments on the revised study and their response to comments:

- In their response to our comment regarding Section 6.2-Existing Roadway Link Directional PHP, the sample calculation for the volumes included in Appendix I-A14 show the adjusted 700 EB PHP volume grown one year to 714 based on a 1% growth rate. This number should be 707 since the number of years is only 1 not 2 (from 2014 to 2015).
- In their response to our comment regarding Section 6.3-Existing Roadway Link Directional LOS, please confirm the facility types used for the roadway segments. Some of the segments are not 'State Signalized Arterials'; therefore, an adjustment factor of 10% should be made for 'Non-State Signalized Roadways'. Other adjustment factors may apply if a roadway segment does not provide exclusive turn lanes. For example, NW 107th Avenue is listed as a state road, but is a county road. Also, the appendix listed the LOS D and E 2-way Maximum Service Volumes as 3,078 and 3,222 respectively. However, these correlate to LOS C and D.
- In Exhibit 2: Roadway Segment LOS Analysis – Combined ADM/Graham PM Mitigation Summary, why don't the two segments of NW 97th Avenue from NW 170th Street to NW 178th Street also require 6 lanes under the 2040 CDMP scenario if these segments require 6-laning under the 2020 CDMP/Zoning analysis?
- To add to FDOT's comment on Table I-1 for NW 107th Avenue regarding the footnote {No traffic count available; 8,000 AADT with K and D factors was assumed and PHPs derived similar to FDOT Daily Only counts} The response was "*Footnote number 4 reference is already included in the NW 107th Avenue roadway segment under the column header "No.", referring to the FDOT count station number (e.g. eight column in the table). The footnote will be maintained here since there is "no count" but rather an estimate. Please note that the footnote and data assumptions are highlighted in a light purple to stress that no traffic counts were available for this roadway segment. The 8,000 estimate is very much an estimate. We have no roadway segment nor intersection turning movement counts in the vicinity to assist in preparing a more detailed estimate.*" It is recommended that volumes from the model should be used to more accurately estimate background trips.

Thanks,

Myra

From: Stillings, Noel (RER)
Sent: Tuesday, November 01, 2016 2:55 PM

To: Mayra Diaz; 'JRodriguez@mdxway.com'; 'mgonzalez@cityofhialeahgardens.com'; 'Brandon R. Schaad'; 'reya@miamilakes-fl.gov'; 'dstorch@hialeahfl.gov'; 'jehernandez@hialeahfl.gov'; 'JSanchez@hialeahfl.gov'; 'bhenry@broward.org'; 'Sesodia, Josie'; 'sbrunner@broward.org'; 'ASEBO@broward.org'; 'Sandanasamy, Vinod'; 'sezuniga@miramarfl.gov'; 'Silva, Eric B.'; 'rsalamon@sunrisefl.gov'; 'isabelc@sfrpc.com'; 'khamilton@sfrpc.com'; 'imoreno@sfrpc.com'; 'Kathe Lerch'; 'DaubertT@miamilakes-fl.gov'; 'cromarJ@browardmpo.org'; 'stanley.merantus@dot.state.fl.us'; 'antonio.castro@dot.state.fl.us'; 'RMartell@townofmedley.com'; 'mayor_ross@coopercityfl.org'; 'teresita.hernandez@simon.com'; 'dtolces@cityatty.com'; 'Rob Curtis'; 'Francisco Alonso'; 'Luis Martinez'; 'alfred.lurigados@ch2m.com'; Jeffrey Bercow (jbercow@brzoninglaw.com); 'randy@coenconsulting.com'
Cc: 'scot.leftwich@Lce-fl.com'; 'Charlotte Davidson'; 'harold.desdunes@dot.state.fl.us'; 'lisa.dykstra@dot.state.fl.us'; 'lisa.colmenares@dot.state.gl.us'; 'Stettner, Alison'; 'Mdportilla@arnstein.com'; 'eruiz@arnstein.com'; 'joseph.goldstein@hklaw.com'; Tracy.Slavens@hklaw.com; 'rGorlow@comcast.net'; 'stu.wyllie@grahamcos.com'; 'Edgar@Edgarjonesco.com'; csweet@bellsouth.net; Boucle, Aileen (MPO); Roa, Carlos (MPO); Edmonson, Tewari (MPO); Osterholt, Jack (Office of the Mayor); Gomez, Lourdes; Woerner, Mark (RER); Rowe, Garett A. (RER); Bell, Jerry (RER); Brown, Helen (RER); Patino, Myra (DTPW); Diaz, Claudia (DTPW); Fernandez, Darlene (DTPW); Cejas, Monica (DTPW); Cartaya, Nilia M. (DTPW); Bian, Jie (DTPW); Bravo, Alice (DTPW); Blaha, Anthony A. (RER); Bieler, Bernardo (RER); Pino, Raul (RER); Guim, Raquel (RER)
Subject: May 2016 CDMP App. Nos. 5 and 6 – Upcoming public hearings/agency correspondence

Please be advised of the upcoming public hearings scheduled for the May 2016 CDMP Amendment Application Nos. 5 and 6--American Dream Miami and Graham Companies:

- **Tuesday, November 29, 2016 at 7:00 p.m.:** Community Council 5 (Country Club of Miami), Lawton Chiles Middle School, 8190 NW 197 Street, Miami
- **December 7, 2016 at 10:00 a.m.:** Planning Advisory Board, Commission Chambers, Stephen P. Clark Center, 111 NW 1st Street, Miami, FL 33128
- **January 11, 2017 at 9:30 a.m.**: Board of County Commissioners, Commission Chambers, Stephen P. Clark Center, 111 NW 1st Street, Miami, FL 33128

Posted on the RER website at: http://www.miamidade.gov/planning/cdmp-amendment-cycles.asp#201605 is the agency correspondence received from November 2015 to date—including the October 7, 2016 traffic consultant's set of comments and responses.

If you have any questions or need additional information, please contact Garett Rowe or Mark Woerner, (305) 375-2835 / Rowega@miamidade.gov; MWoerner@miamidade.gov

Regards,

Noel Stillings, Senior Planner
Planning Division, Metropolitan Planning Section
Miami-Dade County Department of Regulatory and Economic Resources (RER)
111 NW 1st Street, 12th floor, Miami, Florida 33128
Internal line: 500-5130 / Phone: (305) 375-2835

CDMP AMENDMENT APPLICATIONS NOS. 5 & 6 PROJECTED DEVELOPMENT

Application No.5 – American Dream Miami

Retail	3,500,000 gross sq ft
Entertainment	1,500,000 gross sq ft
Common Area	1,200,000 gross sq ft
Hotel	2,000 rooms 1,500,000-2,300,000 gross sq ft – see Exhibit A
TOTAL	7,700,000-8,500,000 gross sq ft

Application No. 6 – The Graham Companies

Business Park	3,000,000 gross sq ft
Retail	1,000,000 gross sq ft
Residential	2,000 units 2,000,000-3,000,000 gross sq ft – see Exhibit B
TOTAL	6,000,000-7,000,000 gross sq ft

Total Proposed Development for Applications Nos. 5 and 6	**13,700,000-15,500,000 gross sq ft**

EXHIBIT A

Miami-Dade Hotels -- Random Sample

Hotel	Address	Units	Floor Area	Gross SF/Room
Pullman Miami Airport	5800 Blue Lagoon Dr.	281.00	230,420.00	820.00
Sheraton Miami Airport	3900 NW 21 St	405.00	330,942.00	817.14
Intercontinental Miami	100 Chopin Plaza	641.00	465,000.00	725.43
Embassy Suites Airport	3974 NW S River Dr.	318.00	304,073.00	956.20
Doubletree	711 NW 72 Ave	334.00	570,000.00	1,706.59
Intercontinental Doral	2505 NW 87 Ave	265.00	190,879.00	720.30
Hilton Airport	5101 Blue Lagoon Dr	500.00	886,293.00	1,772.59
Mandarin Oriental	500 Brickell Key Dr	326.00	527,824.00	1,619.09
Delano South Beach	1685 Collins	194.00	138,856.00	715.75
Faena	3201 Collins	181.00	342,374.00	1,891.57
Hampton Inn (Brickell)	50 SW 12 St	221.00	261,512.00	1,183.31
Element Miami Intl Airport	3525 NW 25 St	209.00	136,177.00	651.56
Biltmore	1200 Anastasia Ave	280.00	344,207.00	1,229.31
TOTALS		**4,155.00**	**4,728,557.00**	**14,808.85**
Average Gross SF/Room				**1,138.04**
Average Gross SF/Room - National Average*				**750**

Average Gross SF/Room for Hotels with ~200 rooms

1008.231147

Average Gross SF/Room for Hotels with ~400 rooms

1252.956616

Average Gross SF/Unit for Hotels with ~500 rooms

1184.305872

*Based on estimate from Coen & Company, Planning & Transportation Service, Tampa, FL

EXHIBIT B

Miami-Dade Multi-Family Rental Buildings -- Random Sample

Address	Res. Units	Floor Area	Gross SF/Unit	
				Average Gross SF/Unit for Buildings ~200 Units
5800 Blue Lagoon Dr. (proposed)	241.0	333,200.0	1,382.6	1428.19
8250 SW 72 Ct	210.0	370,938.0	1,766.4	
				Average Gross SF/Unit for Buildings ~400 Units
2700 SW 27 Ave	184.0	375,407.0	2,040.3	
1756 North Bayshore Dr.	471.0	737,810.0	1,566.5	1549.93
940 SW 1 Ave	176.0	276,605.0	1,571.6	
				Average Gross SF/Unit for Buildings ~500 Units
200 SE 2 St	462.0	770,744.0	1,668.3	
50 SW 12 St	221.0	261,512.0	1,183.3	1429.70
2236 SW 37 Ave	237.0	407,265.0	1,718.4	
50 SW 10 St	405.0	714,079.0	1,763.2	
1951 NW 12 St	199.0	413,875.0	2,079.8	
6620 SW 57 Ave	404.0	741,993.0	1,836.6	
6880 SW 44 St	205.0	172,385.0	840.9	
145 SW 13 St	418.0	612,782.0	1,466.0	
1451 S Miami Ave	371.0	811,275.0	2,186.7	
900 West Ave	495.0	554,694.0	1,120.6	
1251 NW 20 St	412.0	463,024.0	1,123.8	
8300 NW 7 St	185.0	180,680.0	976.6	
915 NW 1 Ave	463.0	640,321.0	1,383.0	
9615 SW 24 St	331.0	285,243.0	861.8	
9117 SW 72 Ave	160.0	90,227.0	563.9	
TOTALS	**6,250.0**	**9,214,059.0**	**29,100.2**	
Average Gross SF/Unit			**1,474.2**	
Average Gross SF/Unit - National Average*			**1,000**	

*Based on estimate from Coen & Company, Planning & Transportation Services, Tampa, FL

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From:	Jeffrey Bercow <Jbercow@brzoninglaw.com>
Sent:	Friday, November 18, 2016 3:24 PM
To:	Woerner, Mark (RER)
Cc:	Rowe, Garett A. (RER); Gregory Fontela; 'Randy Coen (Randy@CoenCoConsulting.com)'; 'Alexander Heckler (aheckler@LSNpartners.com)'; 'Joseph.Goldstein@hklaw.com'; Miguel Diaz de la Portilla (Mdportilla@arnstein.com)
Subject:	Applications Nos. 5 and 6 of the May 2016 Cycle of Applications to Amend the Miami-Dade County Comprehensive Development Master Plan
Attachments:	Coen & Company Infrastructure Impact Analysis.pdf
Importance:	High

Dear Mark,

We represent South Florida Taxpayer Alliance, Inc. in opposition to Applications Nos. 5 and 6 of the May 2016 Cycle of Applications to Amend the Miami-Dade County Comprehensive Development Master Plan.

Our client has retained Coen & Company to perform a full infrastructure review of the captioned applications. The Coen & Company report is attached, and a summary of the findings follows. Also provided below is an opinion regarding the potential results of certain recommended changes. Please note ADM refers to the American Dream Miami Development and TGP refers to The Graham Project.

<u>Transportation Methodology:</u> From a methodology standpoint ADM obtained approval for 30% of their project traffic to be defined as non-regional traffic. Given the differences between the Minnesota and Florida Retail/Entertainment markets, the non-regional traffic percentage should be no more than 10%.

<u>Transportation Analysis:</u> The revised transportation analysis appears to adequately address the potential impacts of TGP based on their approved methodology. The ADM transportation analysis is still not reflective of the vehicle trip characteristics espoused by ADM. The primary issue is ADM's distribution of "non-regional traffic " (actually should be labeled as "extra-regional traffic"). The analysis continues to distribute approximately 50% of the non-regional traffic to the south along the HEFT. The actual amount of such traffic that should be distributed to the south is 2%. The consultant continues to allow the transportation model to distribute the non-regional traffic as if it is local regional traffic.

<u>Mass Transit Demand:</u> Neither ADM nor TGP have officially committed to the transit improvement identified in their respective transportation analyses. These commitments will

likely be addressed as a part of the final concurrency review. In the case of ADM, the private mass transit analysis justifying the 10.8% modal split is inadequate. The bus fleet required to achieve ADM's transit commitment is a minimum of 28 buses, not the 20 buses indicated in their discussion.

<u>Transportation Impact Fees:</u> Both developments used a Present Day Cost Factor that is inconsistent with the County's impact fee ordinance. Correcting this factor, if required, by the County, will result in an fee increase of approximately 6%. ADM chose to use to county default average trip length (5.6 miles) for retail, apparently ignoring the County's default longer trip lengths for Amusement Parks and Hotels, even though the development contains substantial amounts of both land uses. Based on our research and the documentation provided by ADM an argument can be made that the actual Mall of America (MOA) average trip length for residents is 9.20 miles. Using this trip length results in a Transportation Impact Fee increase from $58,752,501 ($9,476.21/1,000 sf) to $92,158,553 ($14,864.28) for ADM. A straight application of the county transportation impact fee would result in an ADM fee of $75,038,600 ($12,103/1,000 sf.)

<u>Transportation Recommendations:</u>

- The reduction of the 30% non-regional traffic percentage to 10% would significantly impact the local roadway network and result in the need to completely revise the ADM transportation analysis.

- The recommendation for the redistribution of the non-regional project traffic would add one roadway segment on the Turnpike and I-75 north of the site and eliminate two roadway segments along the HEFT to the south. If the redistribution caused the review agencies to determine that the assignment of trips to the HEFT/NW 170th interchange was inappropriate and more traffic should be added to the I-75/Miami Gardens interchange there could be a significant issue.

- The results of ADM Transit review recommend the private bus fleet be expanded by 40% and monitored for compliance purposes.

- Transportation Impact Fees for ADM are a serious area of concern; left as proposed ADM will be able to significantly underpay its transportation impact fee.

Please call us should you have any questions.

Regards,

Jeff Bercow

Bio Vcard

JEFFREY BERCOW, ESQ.

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American Dream Miami & The Graham Project

Infrastructure Impact Analysis

Review Comments

The review comments provided below focus on the proposed infrastructure impacts to transportation, water, waste water, solid waste, and stormwater management. These infrastructure areas are independently reviewed for the two proposed developments: American Dream Miami (ADM); and The Graham Project (TGP). These two proposed developments are located adjacent to one another at the southwestern quadrant of Interstate 75 (I-75) and the Homestead Extension of Florida's Turnpike (HEFT) in Miami-Dade County Florida.

TRANSPORTATION IMPACT REVIEW

The transportation review includes: roadway and intersection impacts; public and private mass transit demands; hurricane evacuation; and transportation impact fee calculations. The review of the Transportation Impact Analysis of roadway and intersection focuses on one significant Transportation Methodology concern regarding the ADM analysis and one significant area of concern found in the ADM Transportation Impact Analysis. The Mass Transit review found one significant concern regarding the proposed ADM private transit concept and an overall concern in that neither ADM nor TGP have officially commented to the transit improvements identified in their respective transportation analyses. The Hurricane Evacuation Analysis resulted in no significant areas of concern based on the information provided. The Transportation Impact Fee calculation review resulted in one significant regarding the calculation of the ADM transportation impact fees and one procedural issue regarding present day cost calculation for both ADM and TGP transportation impact fee amounts. In addition, a set of buildout transportation impact fee calculations were completed for TGP since it was not provided in their transportation analysis.

TRANSPORTATION METHODOLOGY CONCERN

The ADM applicant claims 30% of project traffic will be "non-regional" in nature. The applicant has defined "non-regional" project traffic as vehicle trips with an origin/destination outside of the Southeast Regional Planning Model for Florida area based on Mall of America (MOA) transportation studies. This claim assumes the retail and theme park environment in Florida is basically the same as in Minnesota, i.e., ADM will have minimal competition from the existing retail and theme park markets in Florida. For the purposes of these comments the applicant's "non-regional" traffic label will be more correctly referred to as "extra-regional" traffic.

Minnesota is a relatively small retail market representing 1.4% of the USA market in terms of retail sales and the number of shopping centers state wide according to the International Council of Shopping Centers (ICSC). StateMaster (SM) ranks Minnesota thirtieth (30^{th}) out of the fifty states based on number of shopping malls (regional and super-regional centers). By contrast, Florida has a very large competitive retail market which represents 7.9% of the USA retail sales and 9.4% of the shopping centers in the USA. SM ranks Florida second (2^{nd}) out of the fifty states based on the same criteria.

The MOA facility dominates both the regional and extra-regional retail and entertainment markets in Minnesota with minimal competition and its central location in the Minnesota/Wisconsin (SM ranked # 25)/Iowa (SM ranked # 34) market. The combined Minnesota/Wisconsin/Iowa retail market is approximately 40% of the size of the Florida retail market according to SM.

By contrast, the proposed American Dream Miami (ADM) location is not centrally located in Florida and virtually all the ADM extra-regional traffic must come from the north since there are no extra-regional markets directly to the east or west (Collier County to the west would still have to approach ADM from the north) and the extra-regional market to the south is extremely small with a population of less than 75,000 persons (Monroe County).

The Florida retail market includes 596.4 million square feet of retail space and currently is home to the third and eight largest retail facilities in the USA according to ICSC. The ADM retail facility at buildout will represent less than one percent (actually 0.73%) of the retail space in Florida, while in Minnesota MOA represents nearly five percent (actually 4.3%) of that state's retail space. There is very significant completion in the Florida retail market and the vast majority of the competitive retail market is located north of the ADM location.

The Florida entertainment market includes seven of the Top 25 Theme Parks in the world according to Themed Entertainment Association (TEA), while Minnesota has none. The Florida water park market includes four of the Top 10 Water Parks in the world according to TEA, while Minnesota has none. All of these Top 25 Worldwide Florida Theme Parks and Top 10 Worldwide Florida Water Parks are located approximately 200 miles north of the MOA site. There is extremely significant competition in the Florida entertainment market and virtually all of this market is located north of the ADM location

Recognizing that virtually all of the ADM extra-regional traffic will come from the north and most of such traffic will travel on routes that pass through sizable/competitive retail facilities and are proximate to world recognized Florida theme parks and water parks, the likelihood that ADM will attract the same 30% of its extra-regional patrons from outside the local regional market is extremely unlikely.

Use of the MOA 30% extra-regional factor for the ADM facility is not supportable when the differences in the Minnesota markets and the Florida markets are considered. The extra-regional factor for the ADM Transportation Impact Analysis should be significantly be reduced. Adjusting the extra-regional factor based on dominance/size in the state market would yield an extra-regional factor of 5% (0.73% of Florida Market/4.30% of Minnesota Market = 0.17 x 30% factor = 5.1%). The uniqueness and success of the MOA/ADM concept can be accounted for by providing a doubling of the extra-regional factor to 10%.

The extra-regional factor for the ADM Transportation Impact Analysis should be reduced from 30% to 10%. This reduction in the extra-regional factor will result in additional local/regional transportation impacts that have not been analyzed.

TRANSPORTATION IMPACT ANALYSIS CONCERNS

The American Dream Miami applicant claims 30% of project traffic will be "non-regional" in nature. The applicant has defined "non-regional" project traffic as vehicle trips with an origin/destination outside of the transportation model area. The applicant indicates that the SERPM transportation model utilized in their analysis produces a project traffic distribution that "is lower than reasonable via the HEFT and NW 170th Street interchange" based on their assumption that 30% of the project traffic will be "non-regional".

For the purposes of these comments the applicant's "non-regional" traffic label will be more correctly referred to as "extra-regional" traffic. It must also be noted that the above Trip Generation Characteristics comment indicates that the 30% extra-regional factor utilized in the Transportation Impact Analysis is not supportable based on the out-of-state information provided by the applicant. Nevertheless, the comment below will utilize the 30% extra-regional factor since that is the factor currently utilized by the applicant in the analysis.

Based on this extra-regional claim the applicant has placed 30% of the American Dream Mall (ADM) socioeconomic data in a separate Traffic Analysis Zone (TAZ) adjacent to the proposed interchange of the HEFT and NW 170th Street; however, the applicant did not distribute this extra-regional project traffic in a manner consistent with their claim. Instead, the applicant utilized the transportation model to distribute the extra-regional project traffic as if it were local/regional traffic. As a result, project traffic to the north on the HEFT and I-75 is significantly underrepresented. Because of this underrepresentation of extra-regional project traffic to the north on the HEFT and I-75, the Transportation Impact Area must be significantly extended to the north for evaluation and mitigation purposes.

The ADM "Project Percentage Distribution" revised model printouts provided in Appendices I-M13, I-M14, and I-M15, show centroid loading percentages for the ADM model secondary "30%" centroid (the red star shown on the model plot and centroid connector to the NW 170th Street roadway adjacent to the HEFT, enlargements of model pages 1139, 1147, and 11155, showing the centroid loading areas are attached). The distribution of project traffic at the proposed HEFT / NW 170th Street interchange is generally consistent throughout the three transportation analysis scenarios (2020 Land Use on 2020 Network analysis: Scenario #1, the 2040 Land Use on 2040 Network analysis: Scenario #2, and the 2040 Land Use on 2040 Network analysis: Scenario #3). The overall distribution of the extra-regional project traffic at this interchange is 47% south in Scenario #1, and 48% south in both Scenarios #2 and #3.

The applicant has distributed nearly 50% of their extra-regional project traffic to and from the south via the HEFT at the proposed NW 170th Street interchange. The only potential "non-regional" area located south of the ADM site is Monroe County. It is highly unlikely that nearly 50% on the ADM extra-regional project traffic will come from Monroe County. As an example, the population of Monroe County is 74,849 persons (2012 census update), the population of Broward County is 1,814,813 persons, and the population of Palm Beach County is 1,355,759 persons. Simply using these three counties as a source for extra-regional project traffic would result in 2.3% of the extra-regional project traffic being distributed to the south (74,849 pop. / 74,849pop + 1,814,813 pop. + 1,355,759 pop.). If the extra-regional area is expanded, the percentage of such extra-regional project traffic occurring south of the site decreases since there is no further expansion of the extra-regional area beyond Monroe County to the south. Even if Collier County to the west was included, the vast majority of such extra-regional traffic would utilize I-75 and approach the ADM site from the north.

Since the ADM extra-regional influence area surely extends further north than assumed by the example above, it is recommended that the extra-regional project traffic distributed to the south be limited to no more than two (2%) percent and the Transportation Impact Area be expanded to the north along the HEFT, Florida's Turnpike, and I-75 for evaluation and mitigation purposes based on the resulting redistribution of extra-regional project traffic. Thus, 98% of the extra-regional project traffic will approach/depart the ADM site from the north.

As a result of the corrected distribution of the extra-regional component of the ADM project traffic, the applicant's claims that the proposed NW170th Street/ I-75 interchange will be "heavily marketed as the primary entry point for American Dream Miami" and thereby cause virtually all (98%) of their extra-regional project traffic to ignore/by-pass the expanded NW 186th Street / I-75 interchange and travel 3.5 miles or more further south along the HEFT and surface streets to access ADM site seems unrealistic. A more realistic distribution of project traffic at the I-75 / NW 186th Street interchange should be required as a part of the corrected extra-regional project traffic distribution and a re-evaluation of the potential project traffic impacts should be provided.

MASS TRANSIT DEMAND

Neither American Dream Miami nor The Graham Project have met the Miami-Dade County Public Transit Level of Service Standard. Thus, their respective applications are deficient based on the findings of the August 2016 Transit Impact Report prepared by the Department of Transportation and Public Works (DTPW). Both applicants have discussed and seemingly committed to transit improvements in the respective transportation analyses, but neither applicant has formally proffered any public transit improvements to the county.

In the case of ADM, the transit analysis to support the 10.8% modal split factor is only consistent if the proposed 20 forty-passenger buses have a consistent 92.2% occupancy for inbound passengers during the afternoon peak hour (inbound traffic reduction of 295 vehicles x 2.5 VOR = 737.5 persons/800 person capacity). It is extremely unlikely that such an occupancy can be achieved and maintained. A reasonable set of assumptions would be a maximum average peak hour occupancy of 75% and 10% of the vehicle fleet out of service for maintenance and repairs. These assumptions would result in the need for a bus fleet of 28 forty-passenger buses (737.5 persons / 30 person occupancy = 25 buses x 1.1 maintenance factor = 28 buses).

HURRICANE EVACUATION ANALYSIS

The American Dream Miami and The Graham Project hurricane evacuation analyses conclude that there is an adequate supply of shelter space and that the projects will not significantly impact the designated hurricane evacuation routes or the cause minimum evacuation clearance times not to be met.

TRANSPORTATION IMPACT FEE CALCULATIONS

The American Dream Miami and The Graham Project transportation impact fee calculations both deviate from the Miami-Dade County adopted calculation procedures. Both sets of calculations rely on unique sets of trip generation calculations and unique external trips percentage calculations. These practices are not unusual for large scale mixed use project. The calculations both also deviate from the county require Present Day Cost (PDC) Multipliers adopted as a part on the Transportation Impact Fee Ordinance. In this case the use of an alternative PDC lowered each of the transportation impact fees calculated by approximately 6% (1.43/1.35). Given the magnitude of the transportation impact fees, this 6% reduction equals to a savings of approximately $3,500,000 for ADM at project buildout and approximately $446,000 for TGP at the completion of their first phase of development.

In the case of ADM, the transportation impact fee calculations are not consistent with the vehicle trip characteristics espoused in their transportation analysis and are also inconsistent with the parameters set forth in the transportation impact fee ordinance. ADM has consistently held that their development is so unique that vehicle trip characteristics of the development cannot be accurately calculated using typical reference sources. The transportation impact fee calculation used a unique set of trip generation characteristics but utilized the shortest Trip Length available in the Transportation Impact Fee Ordinance for the development, a shopping center trip length of 5.90 miles while ignoring the longer trip lengths provided in the ordinance for the other major land uses in their development (Hotel and Amusement Park).

Moreover, ADM ignored the trip length documentation presented in the "Mall of America Special Generator Survey" dated April 20, 2012 include in their transportation analysis in Appendix I-G. Referring to *Table A.28 Duration of Trip to Mall of America (Weighted)* and *Figure 3.10 Origin Location of Resident Visitors at Mall of America* it is possible to determine the average trip length for the Mall of America (MOA) patron (Table and Figure attached). Table 28.A provides average travel times for mall patrons. Utilizing a mid-point travel time for each cohort travel time category and assuming a 20 mph average vehicle travel speed provides a calculation of the average trip length by group. The travel times and distances were verified for each cohort using real time mapping/travel time applications. The calculated average trip lengths were found to be very conservative (shorter lengths than indicated by the applications). Travel times of greater than sixty minutes were eliminated from these calculations since it could be argued that these trip are a part of the ADM "non-regional trips" and not based on resident patrons. The average trip length for resident visitors was found to be 9.20 miles (calculations provided on attached Table 28.A). This result is consistent with the recognized uniqueness of the MOA development and by extension should be utilized for the ADM development since the MOA trip generation characteristics have been used for the ADM transportation analysis and ADM transportation impact calculations. A revised transportation impact fee calculations for ADM is attached wherein only the average trip length has been adjusted to be consistent with the MOA documented trip duration/length. The resulting transportation impact fee is $92,158,553 which translate to a fee of $14,864.28 per thousand square feet of development within the ADM development (copy of the revised transportation impact fee calculations attached).

A set of buildout transportation impact fee for the TGP development was not included in their transportation analysis documentation. The current buildout transportation impact fee for TGP is $46,200,316 based on their calculation methodology.

TRANSPORTATION RECOMMENDATIONS

The following revisions to the American Dream Mall and The Graham Project Transportation Impact Analyses and supporting documents/calculations should be made to more accurately assess the potential transportation impacts of the proposed developments and fully evaluate the proposed changes to the Miami-Dade County Comprehensive Development Master Plan and companion project specific rezoning requests and transportation concurrency evaluations:

- Reduce the Minnesota 30% "extra-regional" factor utilized in the American Dream Miami transportation analysis to a 10% Florida based extra-regional factor to appropriately recognize the retail and entertainment marketplaces differences found when comparing Minnesota and Florida;

- Require that the amount of "extra-regional" American Dream Miami project traffic distributed to the north via the applicant added HEFT/NW 170th Street centroid be increased from slight more than 50% to 98% based on the geographic location of the site and lack of extra-regional markets to the south, east, and west;
- Require ADM and TGP to officially commit to the Mass Transit representations state in their respective transportation analyses.
- Require ADM to commit to the provision of 28 forty-passenger buses and to provide an annual monitoring of passenger occupancy to ensure the 10.8% modal split is achieved and ensure that a re-evaluation of the transportation impacts of the ADM are required if the modal split of 10.8% is not met.
- Determine the Present Day Cost (PDC) to be used in the calculations of transportation impact fees for ADM and TGP.
- Require ADM to utilize a minimum 9.20 mile average trip length for the calculations of transportation impact fees.

WATER IMPACT REVIEW

The Dade County Division of Environmental Resources Management (DERM) has found that the water demands for ADM and TGP developments have been appropriately calculated and that there is adequate capacity to serve the both of the developments based on a preliminary concurrency review. Both developments will be required to make improvements to the water transmission system to support their developments. Neither development will be able to obtain building permits until the water transmission improvements have been identified, funded, and a schedule for construction has been approved which coincides with the development timeframe for their respective developments.

To date, neither ADM nor TGP have provided adequate information regarding the provision of non-potable water sources for irrigation purposes. In fact, DERM has noted that both development have presented information regarding potential non-potable water sources that are inconsistent county policies.

WASTEWATER IMPACT REVIEW

The Dade County Division of Environmental Resources Management (DERM) has found that the wastewater demands for ADM and TGP developments have been appropriately calculated and that there is adequate capacity to serve the both of the developments based on a preliminary concurrency review. Both developments will be required to make improvements to the wastewater transmission system to support their developments. Neither development will be able to obtain building permits until the wastewater transmission improvements have been identified, funded, and a schedule for construction has been approved which coincides with the development timeframe for their respective developments.

SOLID WASTE IMPACT REVIEW

ADM and TGP have both indicated that there is adequate solid waste capacity to serve their respective developments. ADM has proffered a commitment letter from a private entity to serve their development through buildout. TGP has requested a confirmation of service from the Miami-Dade County Solid Waste Department. In both cases the provision of solid waste service and capacity will the subject of a concurrency review and approval at the time of building permitting for each development.

STORMWATER MANAGEMENT IMPACT REVIEW

The stormwater management systems have not been designed for either ADM or TGP. As result, both developments have listed criteria that will have to be met as a part of their respective stormwater management systems. Both stormwater management systems will subject to review and approval by the South Florida Water Management District (SFWMD) and Miami-Dade County.

PARKS/RECREATION IMPACT REVIEW

The ADM contains no residential land uses and is therefore not required to meet local recreation open space criteria. The TGP does contain a residential land use and is therefore required to meet local open space criteria via a concurrency review. Based on applicable county development criteria it appears TGP may provide the necessary recreational open space within the confines of the development. In any event, the provision of recreation open space will the subject of a concurrency review and approval at the time of building permitting for each development.

ATTACHMENTS

ICSC Documentation

StateMaster Documentation

TEA Documentation

Enlarged Model Plot pages 1139, 1147, and 1155

Table A.28 and Figure 3.10 from MOA documentation

Revised ADM Transportation Impact Fee Calculation

Buildout TGP Transportation Impact Fee Calculations

ICSC

Founded in 1957, ICSC is the global trade association of the shopping center industry. Its more than 70,000 members in over 100 countries include shopping center owners, developers, managers, investors, retailers, brokers, academics, and public officials. The shopping center industry is essential to economic development – as a significant job creator, driver of GDP and critical revenue source for the communities they serve through the collection of sales taxes and the payment of property taxes.

Minnesota

		2014	2015	State's Share of US 2015	US 2015
Industry Characteristics	Shopping center space (sq ft)[1]	101.8 mil.	102.1 mil.	1.4%	7.6 bil.
	Number of shopping centers[1]	1,588	1,597	1.4%	115,341
	Shopping center space per capita (sq ft)	18.7	18.6	-	23.5
	Shopping center jobs per center	150	150	-	111
	Employment density (center jobs per 1000 sq ft)	2.3	2.3	-	1.7
Economic Impact	Shopping center employment (number of jobs)	237,510	239,880	1.9%	12.8 mil.
	Shopping center share of total employment	8.4%	8.4%	-	9.0%
	Shopping center retail sales	$36.3 bil.	$37.1 bil.	1.4%	$2.6 tril.
	Per capita shopping center sales	$6,651	$6,755	-	$7,968
	Shopping center state sales tax revenue[2]	$2.5 bil.	$2.5 bil.	1.7%	$147.2 bil.
State Characteristics	Population	5.5 mil.	5.5 mil.	1.7%	321.4 mil.
	Personal income[3]	$267.4 bil.	$277.5 bil.	1.8%	$15.3 tril.
	Per capita personal income	$48,998	$50,547	-	47,676
	Unemployment rate	4.2%	3.7%	-	5.3%

1 Copyright, CoStar Realty Information, Inc., www.costar.com
2 Sales tax revenue generated at shopping centers, except for states not taxing: Alaska, Delaware, New Hampshire, Montana and Oregon. Local government sales tax revenue not included.
3 Average of available quarterly data.
Sources: CoStar Realty Information, Inc.; U.S. Bureau of Economic Analysis; U.S. Bureau of Labor Statistics; U.S. Census Bureau; The Sales Tax Clearinghouse and ICSC Research.

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Florida

		2014	2015	State's Share of US 2015	US 2015
Industry Characteristics	Shopping center space (sq ft)[1]	593.9 mil.	596.4 mil.	7.9%	7.6 bil.
	Number of shopping centers[1]	10,809	10,848	9.4%	115,341
	Shopping center space per capita (sq ft)	29.8	29.4	-	23.5
	Shopping center jobs per center	79	82	-	111
	Employment density (center jobs per 1000 sq ft)	1.4	1.5	-	1.7
Economic Impact	Shopping center employment (number of jobs)	858,300	884,300	6.9%	12.8 mil.
	Shopping center share of total employment	11.0%	10.9%	-	9.0%
	Shopping center retail sales	$184.5 bil.	$188.9 bil.	7.4%	$2.6 tril.
	Per capita shopping center sales	$9,270	$9,320	-	$7,968
	Shopping center state sales tax revenue[2]	$11.1 bil.	$11.3 bil.	7.7%	$147.2 bil.
State Characteristics	Population	19.9 mil.	20.3 mil.	6.3%	321.4 mil.
	Personal income[3]	$850.2 bil.	$894.2 bil.	5.8%	$15.3 tril.
	Per capita personal income	$42,711	$44,111	-	47,676
	Unemployment rate	6.3%	5.4%	-	5.3%

1 Copyright, CoStar Realty Information, Inc., www.costar.com
2 Sales tax revenue generated at shopping centers, except for states not taxing: Alaska, Delaware, New Hampshire, Montana and Oregon. Local government sales tax revenue not included.
3 Average of available quarterly data.
Sources: CoStar Realty Information, Inc.; U.S. Bureau of Economic Analysis; U.S. Bureau of Labor Statistics; U.S. Census Bureau; The Sales Tax Clearinghouse and ICSC Research.

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StateMaster.com

FACTOID # 7: The top five most educated states are all in the Northeast.

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TOP STATS

Which countries have the most:

- Richest
- Most Murderous
- Most Taxed
- Most Populous
- Poorest
- Most Educated
- Most Unemployed
- Healthiest
- Penny pinchers
- Most Trigger Happy
- Best Place to Live
- Largest

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- The Full Wiki marries »

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Lifestyle Statistics > Shopping Malls > Total number (most recent) by state

DEFINITION: Number shopping malls. Includes regional and super-regional centers, enclosed or outdoor.

VIEW DATA: **Totals** Per capita

Definition Source Printable version

Bar Graph Pie Chart Map

Showing latest available data.

Rank	States	Amount
# 1	California:	6,379
# 2	Florida:	3,839
# 3	Texas:	3,325
# 4	Illinois:	2,358
# 5	New York:	1,871
# 6	Ohio:	1,860
# 7	North Carolina:	1,839
# 8	Georgia:	1,817
# 9	Pennsylvania:	1,800
# 10	Virginia:	1,394
# 11	New Jersey:	1,381
# 12	Tennessee:	1,275
# 13	Arizona:	1,237
# 14	Michigan:	1,162
# 15	Massachusetts:	1,043
# 16	Indiana:	1,008
# 17	Missouri:	1,005
# 18	Maryland:	988
# 19	South Carolina:	905
# 20	Colorado:	893
# 21	Washington:	839
# 22	Connecticut:	834
# 23	Louisiana:	751
# 24	Alabama:	701
# 25	Wisconsin:	676
# 26	Kentucky:	649
# 27	Oklahoma:	610
# 28	Oregon:	554
# 29	Kansas:	533
# 30	Minnesota:	529
# 31	Nevada:	487

COMPARE STATES:

State 1: Florida

State 2: Minnesota

Category: Everything

CITATION

"Shopping Malls > Total number by state", National Research Bureau, 2005. Retrieved from http://www.StateMaster.com/graph/lif_num_of_sho_mal-lifestyle-shopping-malls-total-number

Change citation style: APA MLA MHRA CSE AMA Chicago Bluebook Bluebook/JOLT

# 32	Mississippi:	466
# 33	Arkansas:	401
# 34	Iowa:	375
# 35	New Mexico:	331
# 36	Nebraska:	307
# 37	Utah:	281
= 38	New Hampshire:	240
= 38	Rhode Island:	240
# 40	Maine:	213
# 41	Hawaii:	211
# 42	Idaho:	171
# 43	West Virginia:	167
# 44	Delaware:	163
# 45	Vermont:	117
= 46	District of Columbia	99
= 46	Montana:	99
# 48	North Dakota:	88
# 49	Alaska:	70
# 50	South Dakota:	59
# 51	Wyoming:	55
	Total:	48,695
	Weighted average:	954.8

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SOURCE: National Research Bureau, 2005

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2014 THEME INDEX

2014 MUSEUM INDEX

GLOBAL ATTRACTIONS ATTENDANCE REPORT

The definitive annual attendance study for the themed entertainment and museum industries.

Published by the Themed Entertainment Association (TEA) and the Economics practice at AECOM.

TOP 25 AMUSEMENT/ THEME PARKS WORLDWIDE

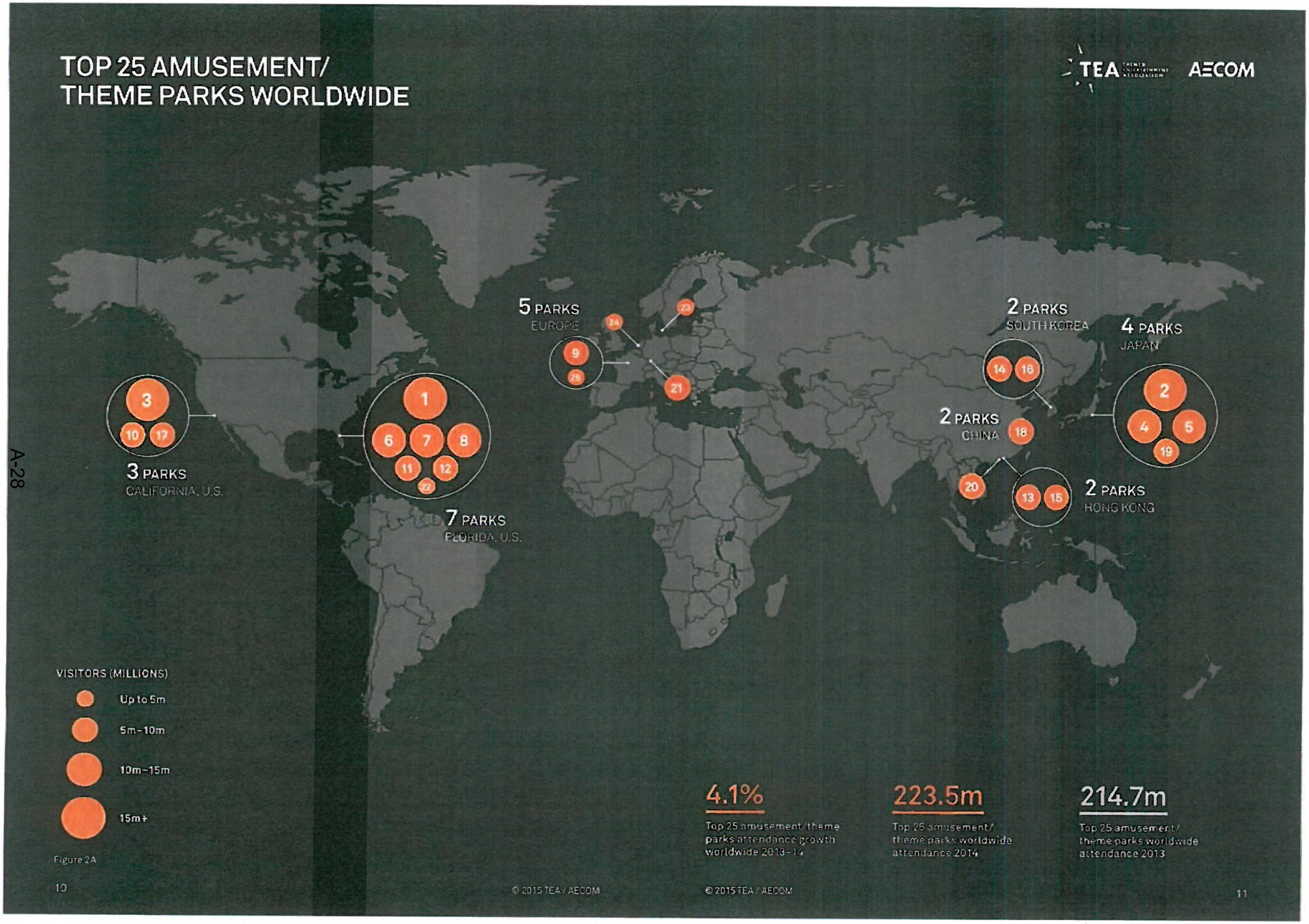


Figure 2A

TOP 25 AMUSEMENT/ THEME PARKS WORLDWIDE

TEA AECOM

Rank	Park and Location	% change	2014	2013
1	**MAGIC KINGDOM** at Walt Disney World, Lake Buena Vista, FL	4.0%	19,332,000	18,588,000
2	**TOKYO DISNEYLAND,** Tokyo, Japan	0.5%	17,300,000	17,214,000
3	**DISNEYLAND,** Anaheim, CA	3.5%	16,769,000	16,202,000
4	**TOKYO DISNEY SEA,** Tokyo, Japan	0.1%	14,100,000	14,084,000
5	**UNIVERSAL STUDIOS JAPAN,** Osaka, Japan	16.8%	11,800,000	10,100,000
6	**EPCOT** at Walt Disney World, Lake Buena Vista, FL	2.0%	11,454,000	11,229,000
7	**DISNEY'S ANIMAL KINGDOM** at Walt Disney World, Lake Buena Vista, FL	2.0%	10,402,000	10,198,000
8	**DISNEY'S HOLLYWOOD STUDIOS** at Walt Disney World, Lake Buena Vista, FL	2.0%	10,312,000	10,110,000
9	**DISNEYLAND PARK AT DISNEYLAND PARIS,** Marne-La-Vallee, France	-4.7%	9,940,000	10,430,000
10	**DISNEY'S CA ADVENTURE,** Anaheim, CA	3.0%	8,769,000	8,514,000
11	**UNIVERSAL STUDIOS** at Universal Orlando, FL	17.0%	8,263,000	7,062,000
12	**ISLANDS OF ADVENTURE** at Universal Orlando, FL	0.0%	8,141,000	8,141,000

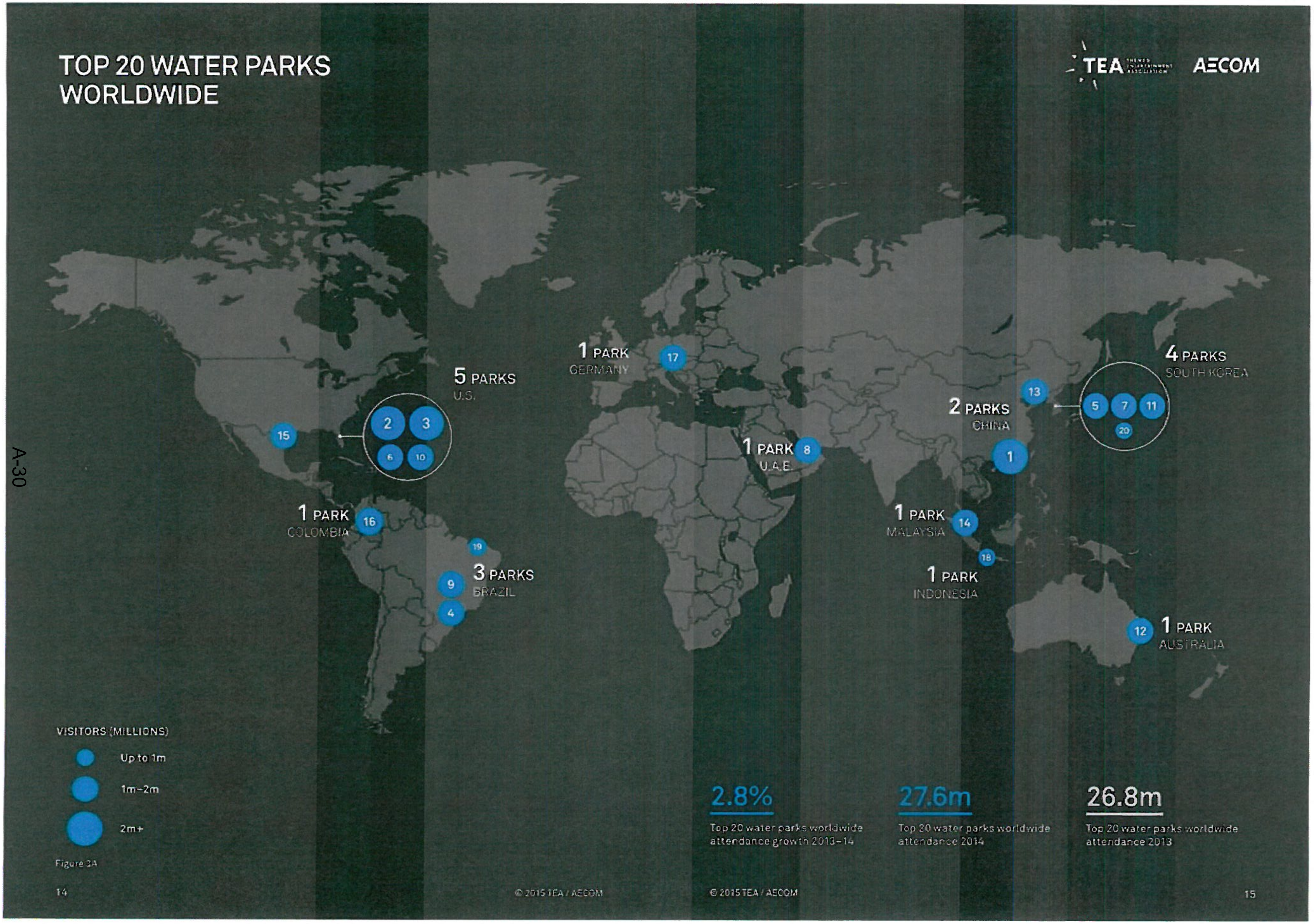
Rank	Park and Location	% change	2014	2013
13	**OCEAN PARK,** Hong Kong SAR	4.2%	7,792,000	7,475,000
14	**LOTTE WORLD,** Seoul, South Korea	2.8%	7,606,000	7,400,000
15	**HONG KONG DISNEYLAND,** Hong Kong SAR	1.4%	7,500,000	7,400,000
16	**EVERLAND,** Gyeonggi-Do, South Korea	1.1%	7,381,000	7,303,000
17	**UNIVERSAL STUDIOS HOLLYWOOD,** Universal City, CA	11.0%	6,824,000	6,148,000
18	**SONGCHENG PARK,** Hangzhou, China	38.3%	5,810,000	4,200,000
19	**NAGASHIMA SPA LAND,** Kuwana, Japan	-3.6%	5,630,000	5,840,000
20	**CHIMELONG OCEAN KINGDOM,** Hengqin, China (new)	NA	5,504,000	NA
21	**EUROPA PARK,** Rust, Germany	2.0%	5,000,000	4,900,000
22	**SEAWORLD FL,** Orlando, FL	-8.0%	4,683,000	5,090,000
23	**TIVOLI GARDENS,** Copenhagen, Denmark	6.6%	4,478,000	4,200,000
24	**DE EFTELING,** Kaatsheuvel, Netherlands	6.0%	4,400,000	4,150,000
25	**WALT DISNEY STUDIOS PARK AT DISNEYLAND PARIS,** Marne-La-Vallee, France	-4.7%	4,260,000	4,470,000
TOTAL		**4.1%**	**223,450,000**	**214,708,000**

Figure 2B

4.1%
Top 25 amusement/theme parks attendance growth worldwide 2013–14

223.5m
Top 25 amusement/ theme parks worldwide attendance 2014

214.7m
Top 25 amusement/ theme parks worldwide attendance 2013


TOP 20 WATER PARKS WORLDWIDE
TEA THEMED ENTERTAINMENT ASSOCIATION
AECOM
5 PARKS U.S.
1 PARK COLOMBIA
3 PARKS BRAZIL
1 PARK GERMANY
1 PARK U.A.E.
2 PARKS CHINA
4 PARKS SOUTH KOREA
1 PARK MALAYSIA
1 PARK INDONESIA
1 PARK AUSTRALIA
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20
VISITORS (MILLIONS)
Up to 1m
1m–2m
2m+
2.8%
Top 20 water parks worldwide attendance growth 2013–14
27.6m
Top 20 water parks worldwide attendance 2014
26.8m
Top 20 water parks worldwide attendance 2013
Figure 3A
14
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15

TOP 20 WATER PARKS WORLDWIDE

TEA AECOM

Rank	Park and Location	% change	2014	2013
1	**CHIMELONG WATERPARK,** Guangzhou, China	4.0%	2,259,000	2,172,000
2	**TYPHOON LAGOON AT DISNEY WORLD,** Orlando, FL	2.0%	2,185,000	2,142,000
3	**BLIZZARD BEACH AT DISNEY WORLD,** Orlando, FL	2.0%	2,007,000	1,968,000
4	**THERMAS DOS LARANJAIS,** Olimpia, Brazil	17.5%	1,939,000	1,650,000
5	**OCEAN WORLD,** Gangwon-Do, South Korea	-5.7%	1,604,000	1,700,200
6	**AQUATICA,** Orlando, FL	1.0%	1,569,000	1,553,000
7	**CARIBBEAN BAY,** Gyeonggi-Do, South Korea	-8.0%	1,493,000	1,623,000
8	**AQUAVENTURE WATERPARK,** Dubai, U.A.E.	16.7%	1,400,000	1,200,000
9	**HOT PARK RIO QUENTE,** Caldas Novas, Brazil	0.3%	1,288,000	1,284,000
10	**WET 'N WILD,** Orlando, FL	2.0%	1,284,000	1,259,000

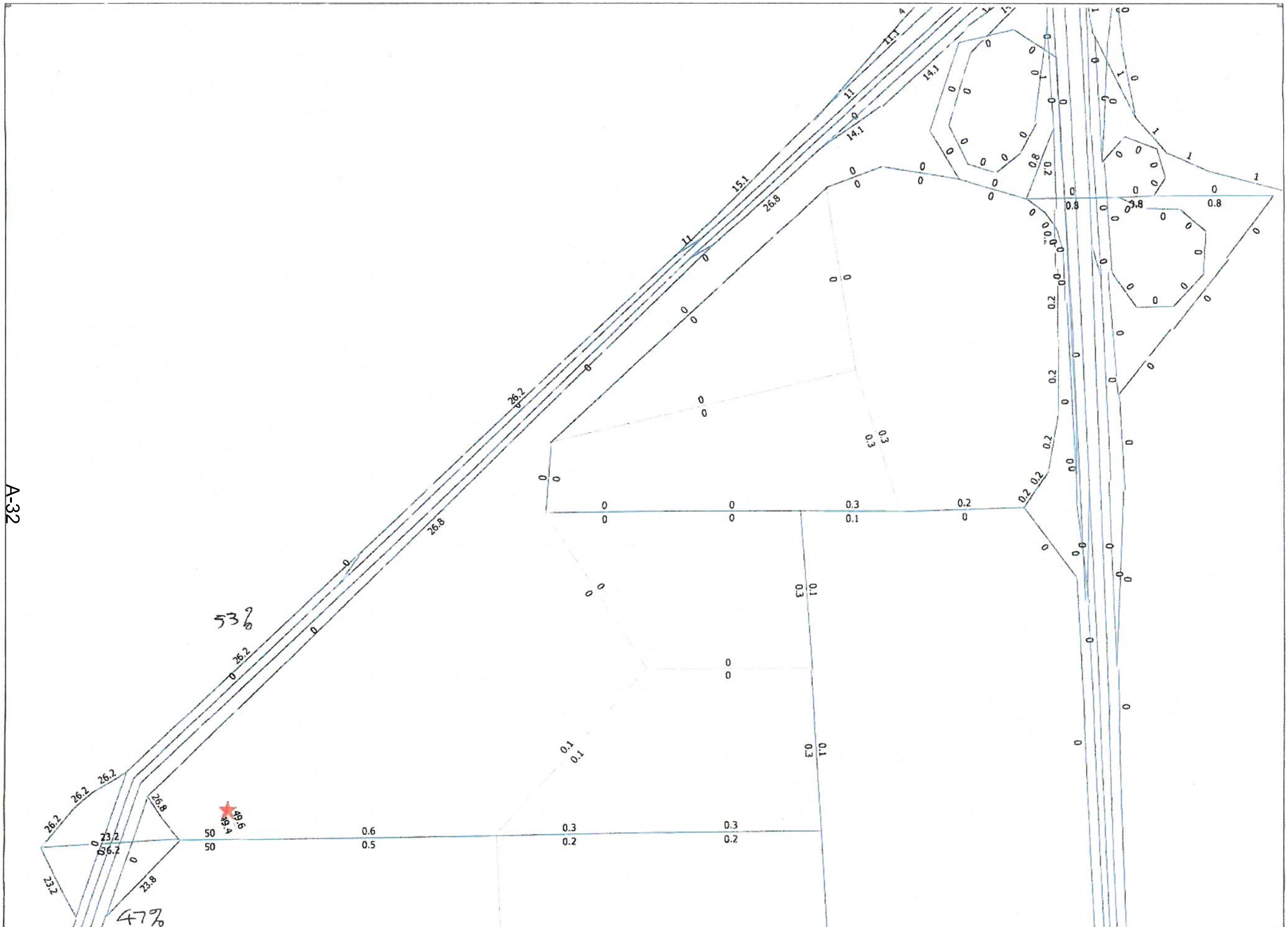
Rank	Park and Location	% change	2014	2013
11	**RESOM SPA CASTLE,** Deoksan, South Korea	2.4%	1,218,000	1,189,200
12	**WET 'N' WILD GOLD COAST,** Gold Coast, Australia	-4.0%	1,200,000	1,250,000
13	**SHENYANG ROYAL OCEAN PARK — WATER WORLD,** Fushun, China	6.5%	1,172,000	1,100,000
14	**SUNWAY LAGOON,** Kuala Lumpur, Malaysia	0.0%	1,100,000	1,100,000
15	**SCHLITTERBAHN,** New Braunfels, TX	1.0%	1,037,000	1,027,000
16	**PISCILAGO,** Girardo (Bogota), Colombia	-1.6%	1,018,000	1,035,000
17	**THERME ERDING,** Erding, Germany	0.0%	1,000,000	1,000,000
18	**ATLANTIS WATER ADVENTURE,** Jakarta, Indonesia	-2.0%	960,000	980,000
19	**BEACH PARK,** Aquiraz, Brazil	-1.6%	949,000	964,000
20	**WOONGJIN PLAYDOCI WATERDOCI,** Gyeonggi-Do, South Korea	-5.2%	945,000	997,000
TOTAL		2.8%	27,627,000	26,887,000

Figure 3B

2.8%
Top 20 water parks worldwide attendance growth 2013–14

27.6m
Top 20 water parks worldwide attendance 2014

26.8m
Top 20 water parks worldwide attendance 2013



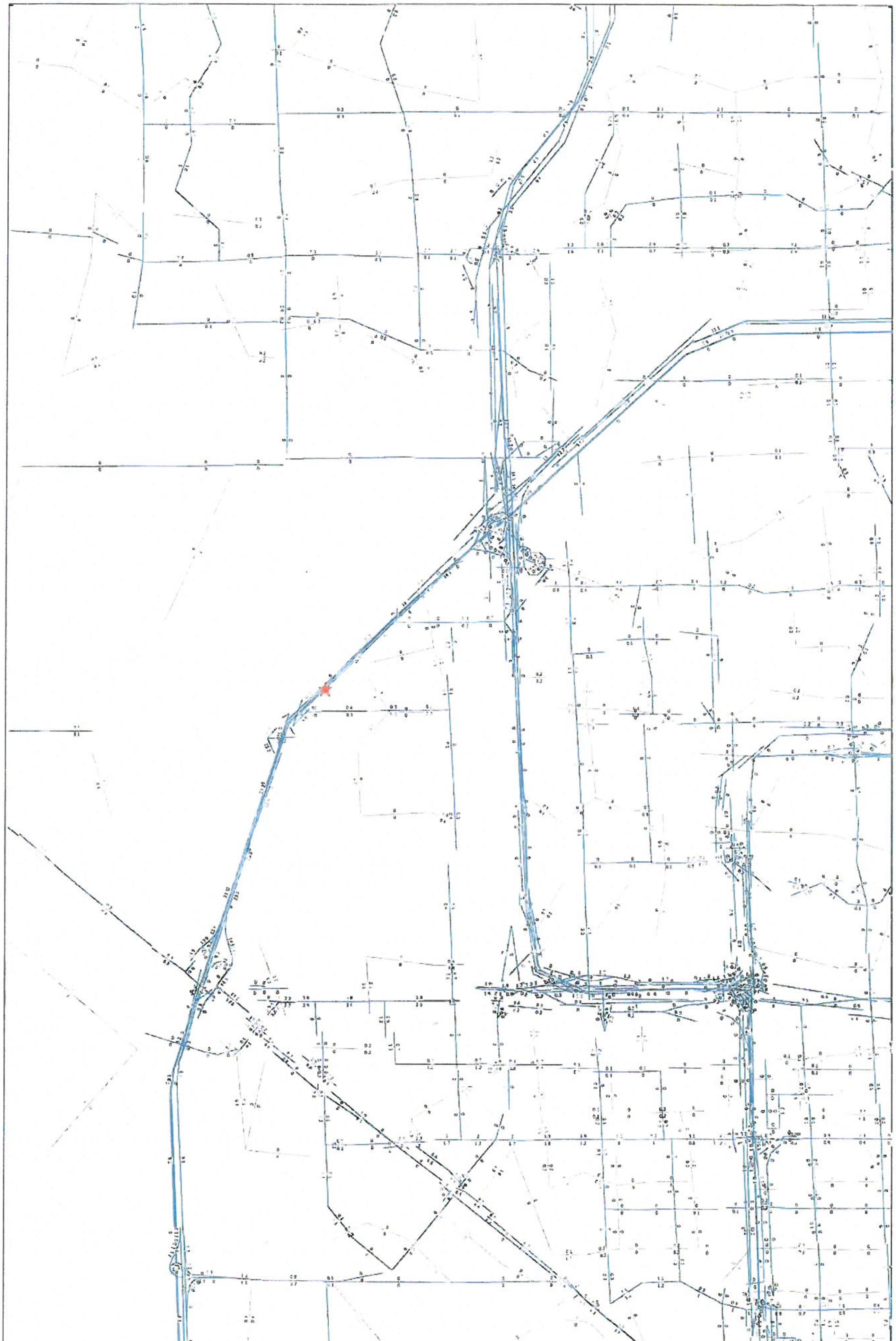
2020 LU on 2020 Network CDMP & Zoning - ADM (Select Zone for TAZ 183) Percentage Distribution (Zoom In)

1134

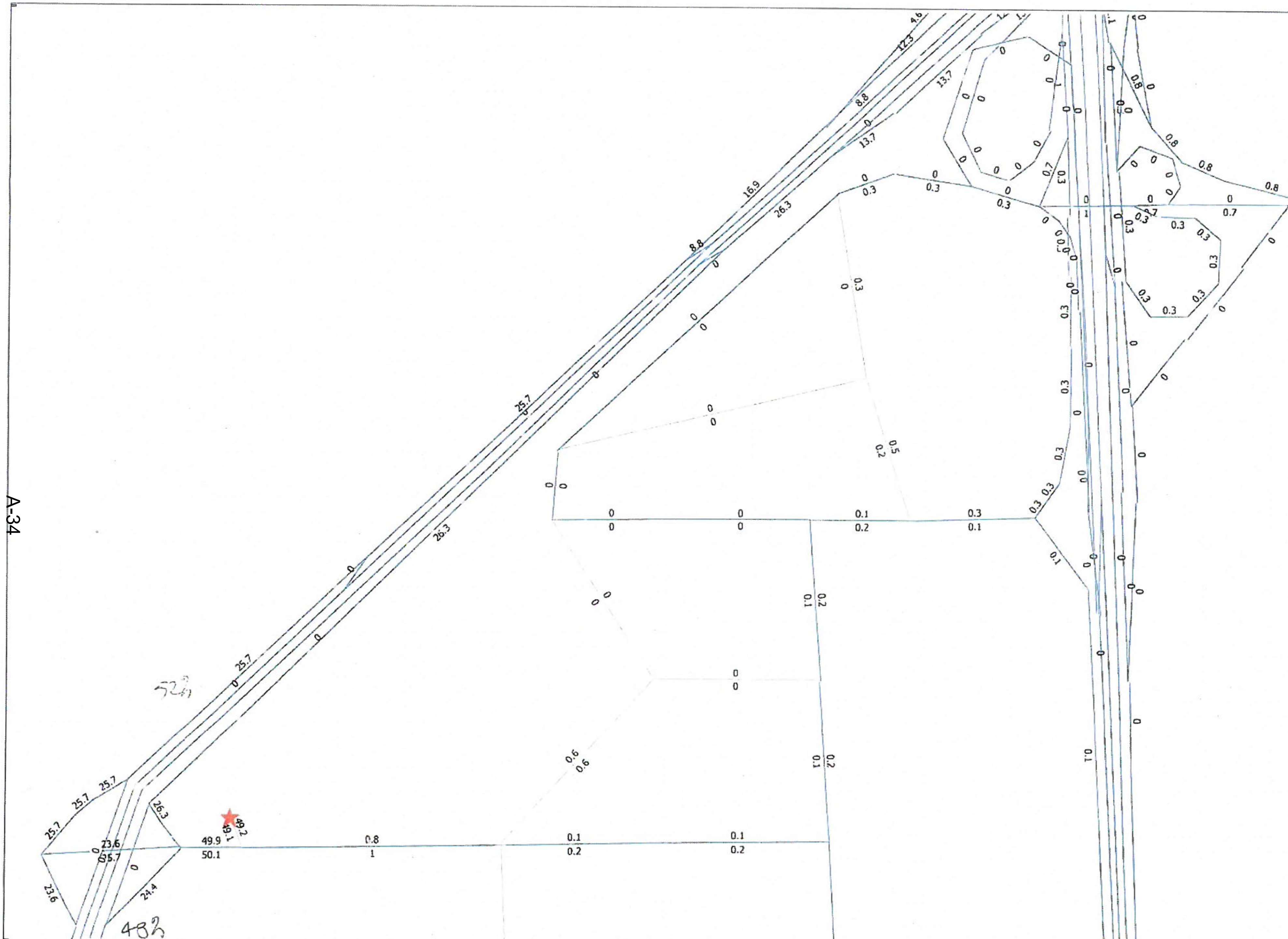
cube

1139

1140



2020 LU on 2020 Network CDMP & Zoning - ADM (Select Zone for TAZ 183) Percentage Distribution (NorthWest)

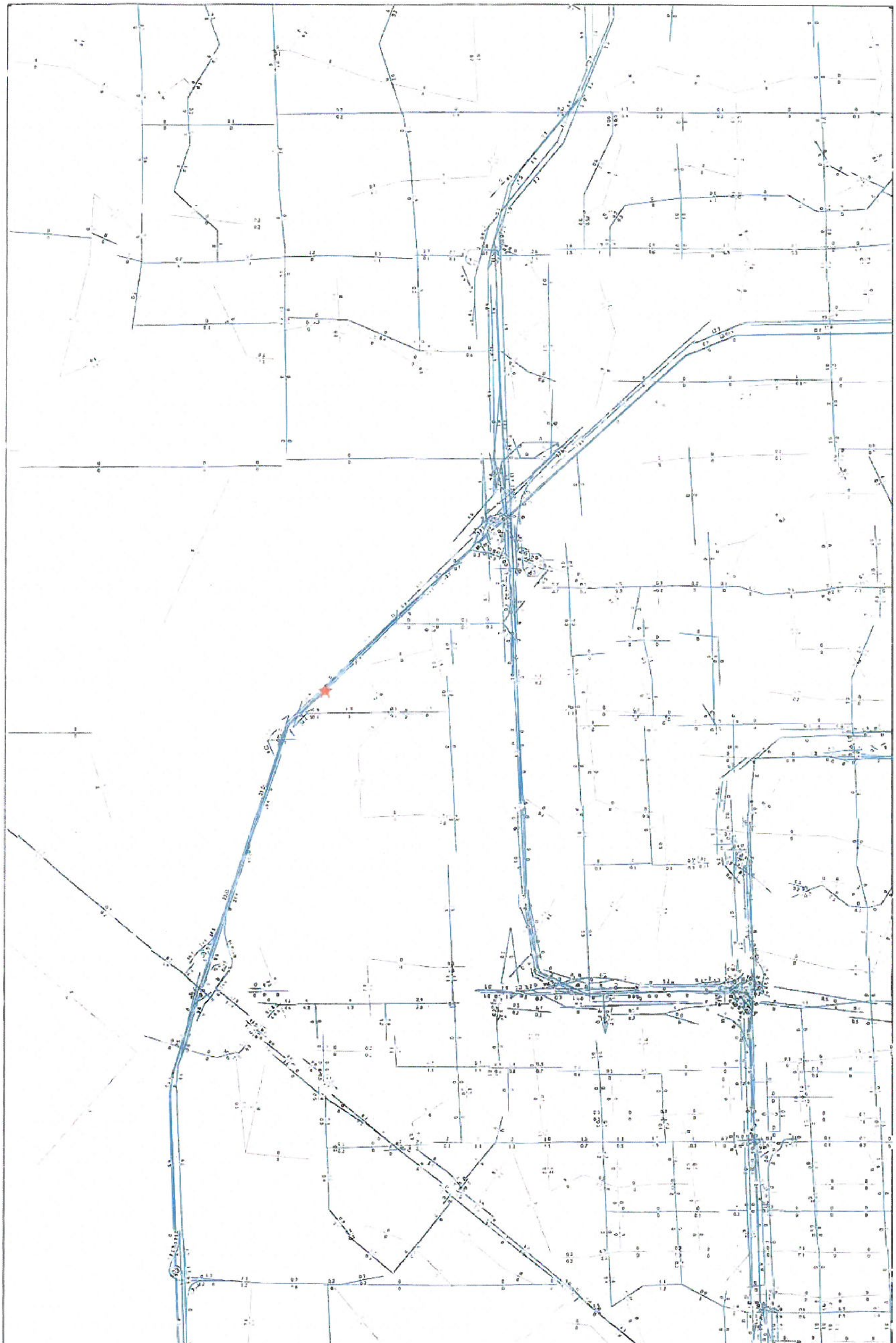


2040 LU on 2020 Network CDMP & Zoning - ADM (Select Zone for TAZ 183) Percentage Distribution (Zoom In)

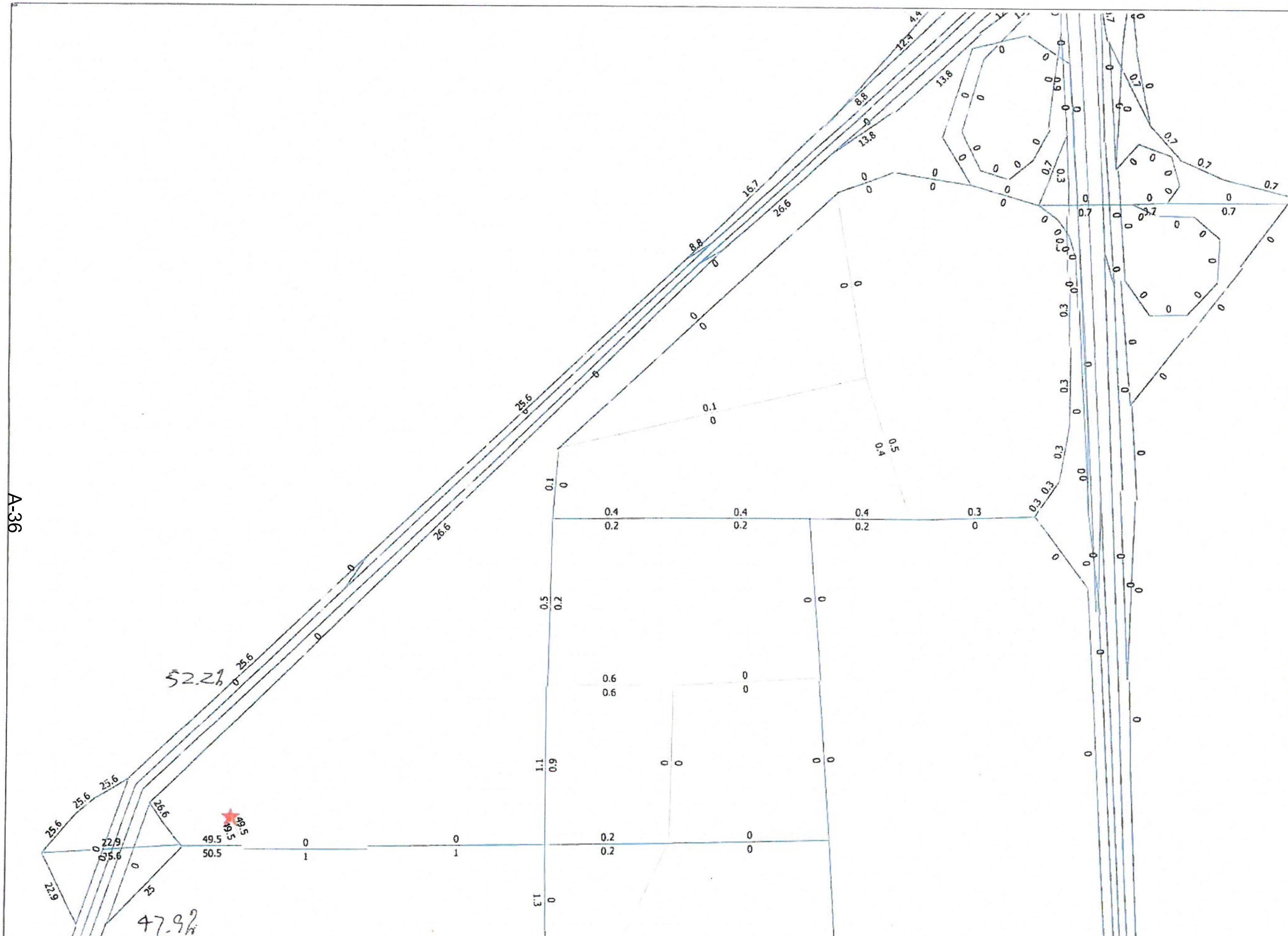
1147

cube

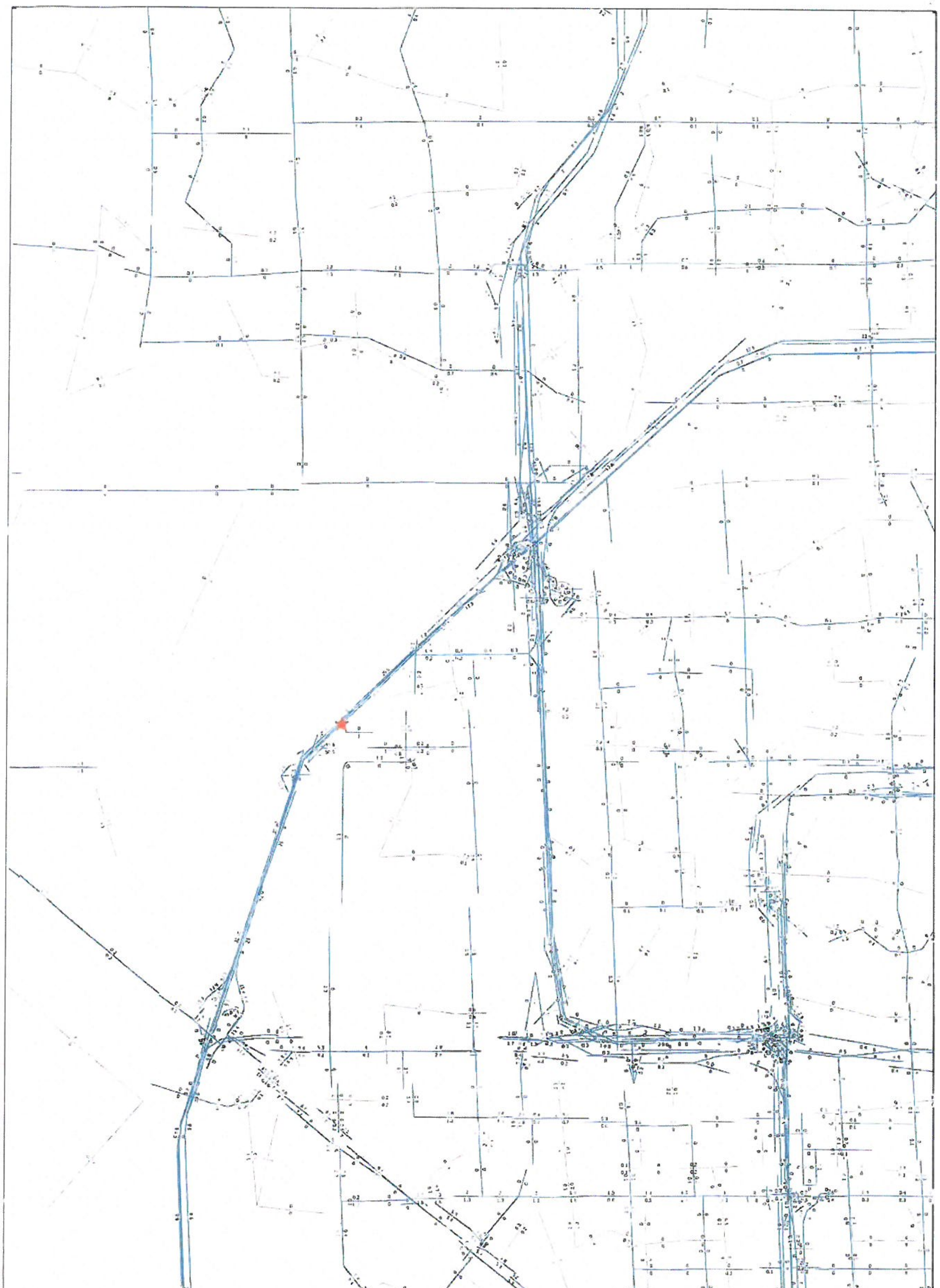
143



2040 LU on 2020 Network CDMP & Zoning - ADM (Select Zone for TAZ 183) Percentage Distribution (NorthWest)



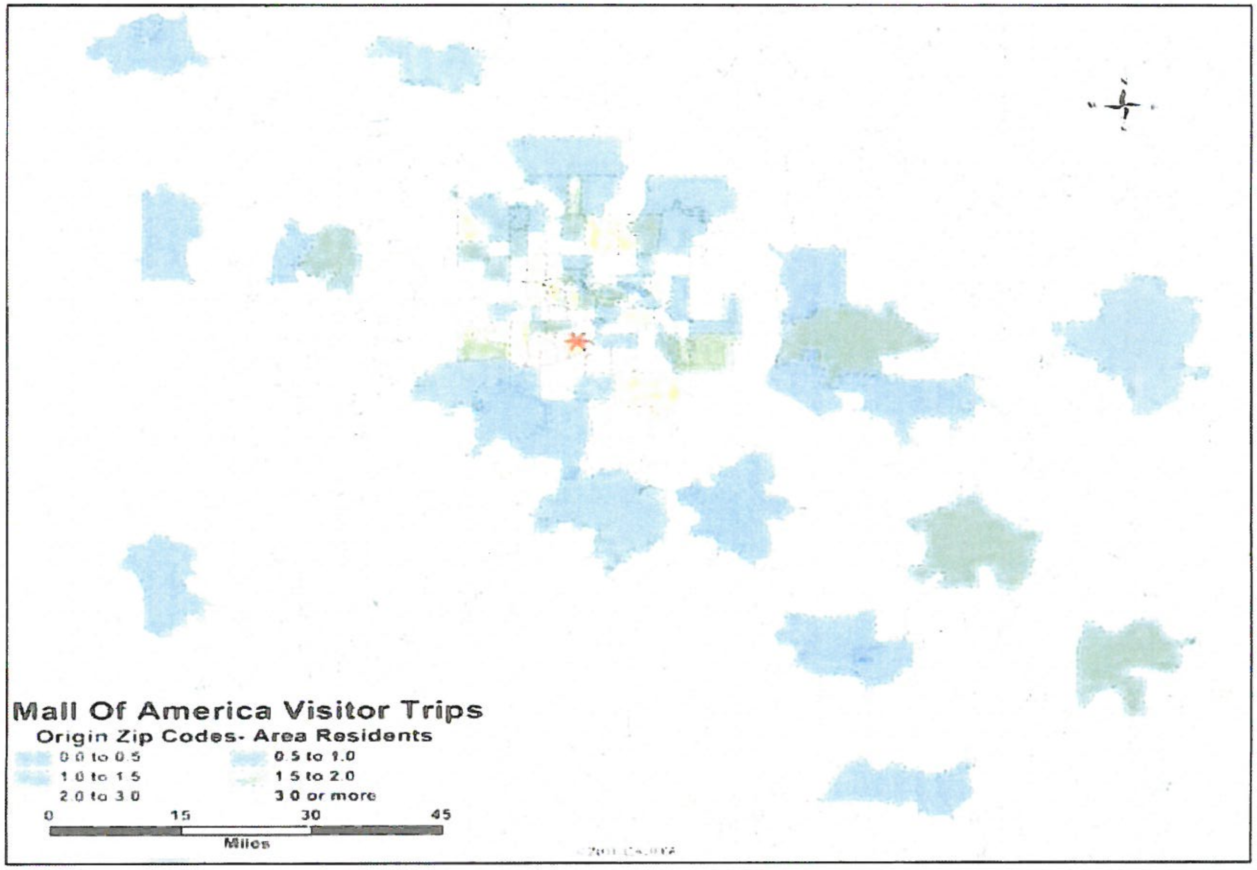
2040 LU on 2040 Network CDMP - ADM (Select Zone for TAZ 183) Percentage Distribution (Zoom In)



2040 LU on 2040 Network CDMP - ADM (Select Zone for TAZ 183) Percentage Distribution (NorthWest)

116

Figure 3.10 Origin Location of Resident Visitors at Mall of America



Source: CS Team Analysis of Survey Data

Restaurant	4	1%
Unreported	2	1%

Source: CS Team Analysis of Survey Data

Table A.27 Origin State(Weighted)

	Frequency	Percentage
IA	1	0%
IL	1	0%
MB	1	0%
MN	240	89%
ND	5	2%
SD	1	0%
VA	1	0%
WI	7	3%
Did not report	14	5%

Source: CS Team Analysis of Survey Data

Table A.28 Duration of Trip to Mall of America (Weighted)

	Avg. Time	Distance**	Frequency	Total Distance	Percentage
15 mins. or less	7.5 min	2.5 mi	44	110 mi	16%
16 mins. to 30 mins.	23.0 min	7.8 mi	68	530 mi	25%
31 mins. to 60 mins.	45.5 min	15.2 mi	65	988 mi	24%
More than 60 mins.*	75.0 min	25 mi	62	1,550 mi	23%
Did not report			~~31~~	—	11%

Source: CS Team Analysis of Survey Data

* Assume 90 min. max

** Assume 20 mph

$\frac{\text{3178 total mi}}{\text{239 total trips}}$ = 13.30 mi Avg Trip Length

Discount > 60 min. trips since likely out of region.

$\frac{\text{1628 total mi}}{\text{177 total trips}}$ = 9.20 mi Avg Trip Length.

Retail with 1,200,000+ GSF was also applied. Table 2 attached shows the calculated impact fee cost corresponding to ADM's planned 6,200,000 GFA of entertainment. The resulting preliminary impact fee cost for the Project equates to $58,752,501.

Table 2
ADM Impact Fee Calculations

American Dream Miami (ADM) Entertainment/Retail (GFA)						
(1) Total Trips =	Proposed Units of Development	× Trip Generation Rate	× (100)% Trips Non-transit	× 1/2	× Percent New Trips	
	6200	12.48	100%	0.50	90.3%	
					34,924	
(2) (Outside UIA) New Lane Miles	Total Trips	× Trip Length	÷ 8,100 Average Daily Vehicles Capacity per Lane Mile			
	34,924	9.20 ~~5.90~~			8,100	
					25.4	39.7
(3) Road Cost =	New Lane Miles	× $1,951,500 per Lane Mile (Including $151,500 per lane mile for Right-of-Way Costs)				
	39.7 ~~25.4~~				$1,951,500	
					$49,643,586	$77,474,550
(4) (Outside UIA) Net Road Cost =	Road Cost	- $265,680 per New Lane Mile credited from Motor Fuels Tax and Vehicle License Fees				
	77,474,550 ~~$49,643,586~~				$6,758,549	$10,547,496
					$42,885,037	$66,927,054
(5) Inflation Factor =	PDC Multiplier					
					1.35	
					1.35	
(6) Road Impact Fee =	Net Road Costs	× Inflation Factor	+ 2% Administrative Costs			
	66,927,054 ~~$42,885,037~~	1.35			$857,701	$1,807,050
		90,351,523			$58,752,501	$92,158,553
Impact Fee Per Unit of Dev =	Road Impact Fee	÷ Proposed Units of Development				
	92,158,553 $58,752,501				6200	
					$9,476.21	$14,864.28

Note: MOA TG rate = 11.26 per KSF; ADM TG rate = 11.26+10.8% LRT Adjustment

The above information has been prepared at the request of Miami-Dade County and represents the preliminary cost that should serve as the basis for evaluating ADM's impact on local roadways.

Detailed coordination will be made with the County to establish how the impact fee costs will be applied within the parameters coordinated between the County and representatives of the ADM development.

APPENDIX III-A:
Graham Preliminary Impact Fee Analysis
06142016

build-out of the Graham Project will include 1,000 KSF of commercial use, 3,000 KSF of business park use, and 2,000 multi-family dwelling units.

For each year, the internal trip capture rate was calculated for the site by utilizing the Multi-Use Development Internal Capture Matrix methodology outlined in the Trip Generation Handbook. The resulting capture rate was applied to total project trips generated by land uses. The quantity of captured trips was then deducted from total trip quantities to derive the net external trips generated by the site. Next, a reduction for diverted trips was applied to account for future project trips on I-75 and HEFT that are already in the background traffic. This project trip type is expected to "divert" from their primary trip on the freeways to a retail use(s) onsite before returning to their primary trip route. The percentage of diverted trips was derived from ITE's fitted curve equation for Land Use 820 (Shopping Center) as provided in ITE's Trip Generation Handbook. The diverted trips shown below are new external trips to the ramps and project roadways, but they are already in the background traffic on the adjacent freeways from which they divert from. The quantity of diverted trips calculated was confirmed to be less than 10% of the background traffic volumes. **Table 1** presents the final trip generation rates. The site-specific trip generation rate serves as the basis for the Graham impact fee calculation.

Table 1
Graham Final Trip Generation

LAND USE	UNITS	DU/KSF	ITE LUC	ITE 9TH EDITION	DAILY	% IN	TRIPS IN	% OUT	TRIPS OUT
APARTMENTS	500 DU	500	220	T = 6.06 (X) + 123.56	3,154	50%	1,577	50%	1,577
RETAIL	150,000 SQ.	150	820	Ln (T) = 0.65 Ln (X) +	8,839	50%	4,420	50%	4,419
BUSINESS PARK	250,000 SQ.	250	770	T = 10.62 (X) + 715.61	3,371	50%	1,685	50%	1,686
GROSS DRIVEWAY TRIPS					**15,363**	50%	**7,682**	50%	**7,681**
INTERNALIZATION	See Note 1		**15.97%**	Internalization See Table IB	2,453	50%	1227	50%	1226
DIVERTED TRIPS TO RETAIL USE	See Note 2		**35.00%**	Ln (TP) = 0.29 Ln (X) + 5.00	2,600	50%	1300	50%	1300
NET EXTERNAL TRIPS					**10,310**	50%	**5,155**	50%	**5,155**

Note 1 - See attached Tables 1B for the Daily Internalization calculations provided using the ITE Multi-Use Spreadsheets and the internalization factors from the ITE Trip Generation Handbook. The Daily internalization Factors are found in Tables 7.1 and 7.2 from the ITE Trip Generation Handbook 2nd Edition.

Note 2 - Diverted Trips to Retail Use for the Year 2020 proposed development program is Limited to 35% of the External Retail Trips (calculated using the ITE Pass-by Formula) and is further limited to 10% of the Adjacent Street Traffic calculated using the closest adjacent FDOT Count Stations 2518 on Miami Gardens Drive and 7048 on NW 138 Street. See Table 1E for the calculations to show compliance with the 10% threshold.

Based on final Trip Generation for each of the three land uses, an equivalent per unit trip rate and percent new trips were derived as shown in **Table 2** below.

Table 2
Graham Final Trip Generation AT BUILDOUT

LAND USE	Trip Gen Rate	Initial Trips	Internal Percentage	External Trips	Diverted Percentage	Diverted Trips	Final Net External trips	Final Trip Gen Rate	Percent New Trips	
APARTMENTS	~~6.31~~	3,154	29%	2,236			2,236	4.47	70.9%	73.7%
RETAIL	~~58.93~~	8,839	14%	7,646	~~35.0%~~	2,600	5,046	33.64	57.1%	68.3%
BUSINESS PARK	~~13.48~~	3,371	~~10%~~	3,028	17.7%	5370	3,028	12.11	89.8%	96.2%
	6.12	12,244	26%	9027			9027	4.51		
	30.33	30,334	14%	26239			20,863	20.86		
	10.86	32,576	4%	31331			31,331	10.44		

Table 3
Graham Impact Fee Calculations

Apartments						
(1) Total Trips =	Proposed Units of Development	× Trip Generation Rate	× (100)% Trips Non-transit	× 1/2	× Percent New Trips	
	2000 ~~500~~	6.12 ~~6.31~~	100%	0.50	73.7 ~~70.9%~~	
					1,118	4510
(2) (Outside UIA) New Lane Miles =	Total Trips	× Trip Length	÷ 8,100 Average Daily Vehicles Capacity per Lane Mile			
	4510 ~~1,118~~	6.09			8,100	
					0.8	33.9
(3) Road Cost =	New Lane Miles	× $1,951,500 per Lane Mile (Including $151,500 per lane mile for Right-of-Way Costs)				
	33.9 0.84				$1,951,500	
					$1,640,373	6,615,5[illegible]
(4) (Outside UIA) Net Road Cost =	Road Cost	- $265,680 per New Lane Mile credited from Motor Fuels Tax and Vehicle License Fees				
	6,615,[illegible] $1,640,373				$223,323	900,6[illegible]
					$1,417,050	5,714,9[illegible]
(5) Inflation Factor =	PDC Multiplier from Table of Present Day Cost (PDC) Multipliers by Calendar Year in subsection 33E-8(d).					
					1.35	
					1.35	
(6) Road Impact Fee =	Net Road Costs	× Inflation Factor	+ 2% Administrative Costs			
	5,714,9[illegible] ~~$1,417,050~~	1.35		154,30[illegible]	$28,341	
					$1,941,359	5,869,2[illegible]
Impact Fee Per Unit of Dev =	Road Impact Fee	÷ Proposed Units of Development				
	5,869,2[illegible] $1,941,359			2000	~~500.00~~	
					$3,882.72	2,934.62

Retail						
(1) Total Trips =	Proposed Units of Development	× Trip Generation Rate	× (100)% Trips Non-transit	× 1/2	× Percent New Trips	
	1,000 ~~150~~	30.33 ~~58.93~~	100%	0.50	69.3 ~~57.1%~~	
					2,523	10,434
(2) (Outside UIA) New Lane Miles =	Total Trips	× Trip Length	÷ 8,100 Average Daily Vehicles Capacity per Lane Mile			
	10,434 ~~2,523~~	5.90 ~~4.00~~			8,100	
					~~1.2~~	7.60
(3) Road Cost =	New Lane Miles	× $1,951,500 per Lane Mile (Including $151,500 per lane mile for Right-of-Way Costs)				
	7.66 ~~1.25~~				$1,951,500	
					$2,431,424	14,831,460
(4) (Outside UIA) Net Road Cost =	Road Cost	- $265,680 per New Lane Mile credited from Motor Fuels Tax and Vehicle License Fees				
	14,831,460 $2,431,424				$331,018	2,019,163
					$2,100,407	12,812,232
(5) Inflation Factor =	PDC Multiplier from Table of Present Day Cost (PDC) Multipliers by Calendar Year in subsection 33E-8(d).					
					1.35	
					1.35	
(6) Road Impact Fee =	Net Road Costs	× Inflation Factor	+ 2% Administrative Costs			
	12,812,232 $2,100,407	1.35			$42,008	256,245
					$2,877,557	13,068,477
Impact Fee Per Unit of Dev =	Road Impact Fee	÷ Proposed Units of Development				
	$2,877,557			1,000	~~150.00~~	
					$19,183.72	13,068.48

Business Park						
(1) Total Trips =	Proposed Units of Development	× Trip Generation Rate	× (100)% Trips Non-transit	× 1/2	× Percent New Trips	
	3,000 250	10.7[illegible] 13.48	100%	0.50	96.2 ~~89.8%~~	
					1,514	15,671
(2) (Outside UIA) New Lane Miles =	Total Trips	× Trip Length	÷ 8,100 Average Daily Vehicles Capacity per Lane Mile			
	15,671 ~~1,514~~	6.07			8,100	
					1.1	11.74
(3) Road Cost =	New Lane Miles	× $1,951,500 per Lane Mile (Including $151,500 per lane mile for Right-of-Way Costs)				
	11.74 ~~1.13~~				$1,951,500	
					$2,214,104	22,917,63[illegible]
(4) (Outside UIA) Net Road Cost =	Road Cost	- $265,680 per New Lane Mile credited from Motor Fuels Tax and Vehicle License Fees				
	22,917,63[illegible] ~~$2,214,104~~				$301,431	3,119,083
					$1,912,673	19,798,55[illegible]
(5) Inflation Factor =	PDC Multiplier from Table of Present Day Cost (PDC) Multipliers by Calendar Year in subsection 33E-8(d).					
					1.35	
					1.35	
(6) Road Impact Fee =	Net Road Costs	× Inflation Factor	+ 2% Administrative Costs			
	19,798,552 $1,912,673	1.35		534,561	$38,253	534,561
					$2,620,362	27,262,606
Impact Fee Per Unit of Dev =	Road Impact Fee	÷ Proposed Units of Development				
	$2,620,362			3,[illegible]	~~250.00~~	
					~~$10,491.45~~	9,882.54

TOTAL FEES $46,200,316

1912

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Rowe, Garett A. (RER)

From:	Jeffrey Bercow <Jbercow@brzoninglaw.com>
Sent:	Friday, November 18, 2016 3:11 PM
To:	Woerner, Mark (RER)
Cc:	Rowe, Garett A. (RER); Gregory Fontela; 'Alexander Heckler (aheckler@LSNpartners.com)'; 'Joseph.Goldstein@hklaw.com'; Miguel Diaz de la Portilla (Mdportilla@arnstein.com); Robert D. Cruz
Subject:	Applications Nos. 5 and 6 of the May 2016 Cycle of Applications to Amend the Miami-Dade County Comprehensive Development Master Plan
Attachments:	AmDreamFINAL+Graham.pdf
Importance:	High

Dear Mark:

We represent South Florida Taxpayer Alliance, Inc. in opposition to Applications Nos. 5 and 6 of the May 2016 Cycle of Applications to Amend the Miami-Dade County Comprehensive Development Master Plan.

We note that there is adequate vacant Business and Office land to accommodate absorption per Policy 8F at the Minor Statistical Area, Tier Level, as well as countywide. Since the applications therefore fail to satisfy the CDMP criteria for approval of future land use map amendments, and for the reasons stated in the attached report prepared by Florida TaxWatch, we are requesting that the applications be denied and not transmitted to state and regional agencies.

Please let us know if you have any questions.

Regards,

Jeff Bercow

Bio | Vcard

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Analysis of Pending CDMP Applications by International Atlantic, LLC and The Graham Companies, Inc.

SEPTEMBER 2016

Prepared by Robert D. Cruz, Ph.D.
Florida TaxWatch Chief Economist. Miami, FL

Summary of the Issues and Findings

- International Atlantic, LLC and the Graham Companies, Inc. submitted applications to amend Miami-Dade County's Comprehensive Development Master Plan (CDMP). The applications include an analyses submitted to the County with the objective of guiding County planning staff in their evaluation of the **CDMP Land Use Policies 8E and 8F**. Policy 8E requires the County to evaluate CDMP amendments considering the application's consistency with the Goals, Objectives, and Policies of all Elements of the CDMP and other timely issues. Policy 8F requires an evaluation of adequacy of non-residential land supplies determined on the basis of land supplies in subareas of the County appropriate to the type of use, as well as the countywide supply within the Urban Development Boundary.

- The International Atlantic application is associated with a 194.5 acre parcel in Northwest Miami-Dade County seeking to change the designated land use to *Business and Office and Employment Center* from its present designation of *Industrial and Office.* A concurrent application was submitted by The Graham Companies seeking to designate 339 acres adjoining the International Atlantic property as *Business and Office and Employment Center*, changing the present designation of *Industrial and Office*. If both CDMP applications are approved then the county will potentially lose over 500 acres of industrial land given the Graham Companies indicated plans to develop only 300,000 square feet of distribution space on its property if the amendment is approved and at the most 200,000 square feet of flex space.

- Both International Atlantic's and the Graham Companies' applications readily concede that there is already enough vacant Business and Office land to accommodate absorption per Policy 8F at the *Minor Statistical Area, Tier Level,* as well as countywide.

- The respective applicants have submitted their rationale as to why they should be allowed to re-designate the properties' land use to *Business and Office and Employment Center* from the existing *Industrial and Office* designation. Their rationale essentially boils down to three key points.

- The following key points are the arguments the applicants have submitted to receive approval of the change in land use from *Industrial and Office* to *Business and Office and Employment Center*:

  - The American Dream Miami (ADM) development, like their Mall of America in Minneapolis, will represent a unique ability to attract tourists with ADM's mix of entertainment and retail, and, therefore, ADM will have broader net economic benefits relative to *Office and Industrial* development.

  - Although both applications concede that there is an adequate amount of vacant *Business and Office* land to satisfy demand through the 2030 planning window and, therefore, does not satisfy the policies of 8E and 8F. International Atlantic, LLC, argues that Miami-Dade County lacks the appropriately located, vacant property large enough to accommodate ADM's proposed project under a land use designation that allows a mega-mall development.

  - After removing the *Industrial and Office* designated land use from the applicants properties there will still be adequate *Industrial and Office* designated land in the *Planning Minor Statistical Area 3.1*, the *Northern Tier*, and countywide to accommodate absorption of vacant land in this land use category to almost 2040.

- Florida TaxWatch has studied the applications submitted to the County by International Atlantic, LLC and The Graham Companies, respectively. Our findings are based on analyses that address each of the preceding **three key points**:

  - **Job Growth and Net Economic Benefits.** An objective analysis of the historical data and experience of the Mall of America (MOA) actually shows that no appreciable, recurring local economic benefits were evident in the 10 years from when the mega-mall opened. The actual history strongly suggests that the development of ADM is not likely to produce significant, recurring economic benefits to Miami-Dade County and the Miami MSA.

  - While International Atlantic, LLC's application focuses on the employment of 11,000 workers at MOA, and as many as 13,000 during peak season in 2015,[1] the history of <u>net</u> job creation in the first decade of MOA provides a very different picture. In 1992 the mega-mall opened its doors with 10,000 employees. Estimates from the U.S. Bureau of Labor Statistics from 1992 to 2002 show, however, that employment of workers in retail department stores in the Minneapolis-St Paul-Bloomington MSA increased at a paltry annual rate of 0.3 percent (virtually no growth at all).

  - Department stores in Minnesota outside of the Minneapolis MSA did not experience developments similar to MOA and yet during the period from 1992 to 2002, employment in department stores <u>in the rest of Minnesota</u> increased at an annual rate of 1.2 percent. The difference in the performance of growth in retail employment in the Minneapolis MSA compared to the performance in the rest of the state confirms the views of early critics of MOA who worried that hiring at the mega-mall was almost assuredly displacing jobs rather than creating a significant number of new retail jobs.

1 The number of workers in 2015 is measured in head counts, and not "full-time equivalents."

- The history of MOA also clearly shows that it would not have been developed but for substantial amounts of government subsidies in the form of tax rebates and public infrastructure investment. American Dream Meadowlands (also owned by same group behind American Dream Miami), which is currently under construction and significantly behind schedule. The developer is seeking a $1 billion bond issue through New Jersey's Sports and Exposition Authority. The bonds would be paid by a state economic incentive program.
- It is also important to keep in mind that unlike the Mall of America in 1992, Miami-Dade County is already a shopping "Mecca" for 15.5 million domestic and international visitors spending $24.4 billion in 2015. Future economic conditions in the Caribbean and Latin America, Canada, Germany, United Kingdom and France will be the key drivers of retail spending by international tourists, notwithstanding the development of a mall along the scale of MOA or larger. The correlation between economic conditions in the countries that comprise the Miami MSA's top visitor markets and international visitor spending suggests that the scale of development or the combination of entertainment with retail would not likely have any *unique economic benefits* as the applicant's analysis suggests.
- **No other vacant property in the County is appropriately located and large enough to accommodate the American Dream Miami project.** An analysis of the Northern Tier shows that several parcels in excess of 20 acres are already designated as vacant commercial and can accommodate larger scale commercial development in the Northern Tier.
- **Adequate Industrial and Office designated vacant land exists in Planning Minor Statistical Area 3.1, the Northern Tier, and countywide to accommodate absorption nearly to 2040.** Focusing only on the Planning Department's quantitative methodology, there is adequate land to accommodate demand from industrial users in the Northern Tier of the County for the foreseeable future. Modern distribution centers, however, need convenient access to interstate highways and sometimes rail, an efficient site plan with appropriate truck turning radiuses and, well defined loading and unloading. Taking these critical requirements in mind, on a practical level there will be potentially two but practically only one adequate vacant consolidated land holding that could accommodate a modern industrial park development in the Northern Tier if the applicants are successful in their application. Re-designation of land use to *Business and Office* for both parcels potentially eliminates the future opportunity to accommodate a second modern industrial park in the Northern Tier.
- **The Graham Companies' request and additional information provided further clarification that the land available for modern industrial/distribution development will be reduced to one property in the Northern Tier if approved.** The Graham Companies had made clear that their plan includes only 300,000 square feet of distribution space and an additional 200,000 square feet of flex space. This distribution/flex space could be accommodated on less than 10 percent of their entire 339 acre property leaving only the FDG Beacon Countyline parcel available for a modern distribution park development.

Analysis of Applications to Re-Designate Land Use as Proposed by International Atlantic, LLC and Graham Companies.

International Atlantic's application to amend the Miami-Dade CDMP, contains an analysis submitted to the County with the objective of guiding County planning staff in their evaluation associated with CDMP Land Use Policies LU-8E and LU-8F. Both policies together require evaluations confirming that proposed CDMP amendments are consistent with the *Goals, Objectives, and Policies* of all *Elements* of the CDMP, other timely issues, and also the determination of adequacy or inadequacy of non-residential land supplies. Our analysis finds that the proposed amendments do not comply with policies LU-8E and LU-8F.

The International Atlantic application is associated with a 194.5 acre parcel in Northwest Miami-Dade County. Concurrent with the submission by International Atlantic, a sister analysis was submitted on behalf of The Graham Companies for an adjoining 339 acre parcel. The analyses, prepared by the same consulting firm, reference each other throughout.

Indeed, while the land uses on the two properties indicated by the applicants to be developed varies. The requested modification to the CDMP for both properties is the same and therefore our comments on both analyses are addressed concurrently herein given the impact of the amendment has the same relative impact.

The rationale the applicant provides as to why the applications should be allowed to re-designate the properties to *Business and Office and Employment Center* use from the existing *Industrial and Office* essentially boil down to three key points:

American Dream, Key Point 1: International Atlantic, LLC indicates that it is important to the County that American Dream move forward due to American Dream's unique ability with its mix of entertainment and retail to attract tourists when compared with other malls and commercial centers in the County. As a result, American Dream will have broader net economic benefits when compared to the office and industrial development which would be allowed under the current land use designation;

American Dream, Key Point 2: International Atlantic, LLC concedes that there is an adequate amount of *Business and Office* land designated to satisfy demand through 2030. The application for a CDMP amendment does not satisfy the requirements of Land Use Policies LU-8E and LU-8F. The applicant, however, indicates that there is no appropriately located vacant property large enough in Miami-Dade County to accommodate the proposed ADM project under a land use designation that will allow a mega-mall development. Therefore, the only way the project could move forward is if the land use is amended;

American Dream/Graham Companies, Key Point 3: International Atlantic, LLC and the Graham Companies indicates that even after re-designating their properties land use to *Business and Office and Employment Center*, there will still be adequate *Industrial and Office* designated land in the Planning MSA 3.1, the Northern Tier, and Countywide to accommodate absorption nearly to 2040, well beyond the CDMP's planning window.

Analysis of American Dream, Key Point 1.

A. Stated Premise by American Dream: International Atlantic, LLC argues that ADM is a unique development which will drive economic benefits which do not typically accrue from other retail developments.

B. What the Data Actually Indicates: Based upon the early history of the Mall of America, which is stated by the applicant as the best example for the economic benefits which would accrue from American Dream Miami, there will be no appreciable recurring local economic benefits to Miami Dade County from the development of American Dream Miami. Additionally, the development of Mall of America and American Dream Meadowlands (New Jersey) have been predicated on deep public sector investment of resources and tax revenue.

C. Discussion:

The Historical Economic Impact of the Mall of America: Bloomington MN

The Mall of America was developed in response to decisions of the local professional baseball and football franchises to relocate from the city of Bloomington, to new facilities in nearby downtown Minneapolis. In 1982 the teams moved from the Metropolitan Stadium to the new Hubert H. Humphrey Metrodome in downtown Minneapolis. The relocation of the teams presented a development opportunity on 78 acres of land with convenient access to major interstate highways and within close proximity to the Minneapolis-St. Paul International Airport. Several proposals for the redevelopment of the Metrodome site were considered by the Bloomington Port Authority, and ultimately a mixed-use retail/entertainment center was chosen for the development.

The construction of the Mall of America ("MOA") broke ground in the summer of 1989 and opened to the public in late summer of 1992. MOA opened with anchor tenants like Macys, Nordstrom, Bloomingdale and Sears, and 330 smaller brand named stores. The size of the retail development, however represented a disruptive competitive threat to the existing malls in the area. The uncertainty associated with a dramatic increase in retail space at the time was expressed in the fear of significant losses in asset values of existing mall properties. The existing mall owners at the time were concerned with the massive scale of the retail components of MOA, the location's favorable access to interstate highways, and the public subsidies directed to MOA. Together these elements represented a significant competitive threat to existing mall operators. MOA benefited from the tax increment financing (TIF) it received, reducing their effective property taxes by 96 percent, and also received a significant share of state sales taxes on purchases within MOA as a rebate.[2] The TIF covered infrastructure improvements such as parking, drainage and roads within the development.

The U.S. Bureau of Labor Statistics (BLS) estimates that two years before the opening of MOA, 35,800 employees held jobs in *General Merchandise* (retail) *Stores*[3] in the Minneapolis metropolitan statistical

2 "Minnesota Mall's Impact Questioned," North Jersey.com, 12/24/2011. (Accessed 3/21/2016)

3 General Merchandise Stores, are defined by the Bureau of Labor Statistics as establishments that sell at retail new general merchandise from a fixed point-of-sale location. This subsector consists of Department Stores: NAICS 4521 and Other General Merchandise Stores: NAICS 4529. Establishments in this subsector are unique in that they have the equipment and staff capable of retailing a large variety of goods from a single location. This includes a variety of display equipment and staff trained to provide information on many lines of products.

area (MSA).[4] Between 1990 and 1992 the number of jobs in general merchandise retail declined by 1,900 employment positions.

According to Mall of America, 10,000 employees began working at MOA in August of 1992.[5] BLS data, however, indicates that in 1992 general merchandise retail establishments in the MSA experienced *net loss* in jobs of 3.1 percent (-1,100 jobs). In 1993 the MSA experienced a net increase of just 400 jobs (+1.2 percent) compared to 1992. The difference between the actual gain in employment estimated by the BLS, and the direct employment reported by MOA suggests that local mall operators were losing tenants and/or tenants were cutting back on payroll even before MOA opened, which continued through 1993. A review of BLS estimates of employment in general merchandise stores shows a cumulative increase in jobs of only 1,000 employment positions between 1992 and 2002 (a growth of only 0.3% per year), indicating that hiring at MOA was almost assuredly displacing jobs rather than creating a significant number of new retail jobs.[6]

Newspaper articles from 1992 and 1993 often focused on the challenge that long standing retailers were facing as a result of the competitive threat posed by the opening of MOA. In 1992 retailers were just beginning to see hopeful signs of growth in personal income and consumer spending. Notwithstanding the optimism, the Carson Pirie Scott department store announced in May 1992 that it would close the doors of its flagship store in downtown Minneapolis on January 30, 1993, laying off 200 employees.[7] In July 1992, Carson announced that its store in the City of St. Paul would also close on January 30th, resulting in similar layoffs at the Minneapolis store.

In early June of 1992 public officials expressed their concerns that local retailers could suffer from the expansion of retail space. Minnesota Governor Arne Carlson told the Star Tribune, referring to MOA that "The potential excites us and the prayer is that it does not cause harm to other malls."[8]

Peter Rachleff, professor of labor history at Macalester College in St. Paul, noted that for every job created by a store at MOA, a retail job will be lost elsewhere.[9] BLS estimates of unemployment 12 months before and 12 months after August 1992, does not show a favorable impact in the Minneapolis MSA's unemployment rate.[10] A supervisor with the Minnesota Department of Jobs and Training, referring to MOA's recruitment of sales workers, told the Star Tribune that she always believed that retailers at the mega-mall would need to "steal people from other companies" to meet their hiring quotas.[11]

4 The metropolitan statistical area (MSA) is comprised of 16 counties, of which 14 are located in Minnesota and two on the Wisconsin border with Minnesota. The metropolitan area consists of 7,400 square miles and a population of 3.9 million as of 2014.

5 The estimates of employees in 1992 are from Mall of America: History – Mall of America http:/mallofamerica.com/about/moa/history. (Accessed: 3/21/2016).

6 Expanding this analysis to include the gains in employment of all retail establishments, which includes smaller retail stores in the Minneapolis–St. Paul–Bloomington MSA, one finds employment in all retail establishments between 1992 and 2002 increased by only 3,400 jobs – far less than 10,000 jobs at MOA. (Accessed: 6/24/2016.)

7 "Minneapolis Carson's will close in January," The Star Tribune, May 14, 1992. (Accessed: 7/12/2016.)

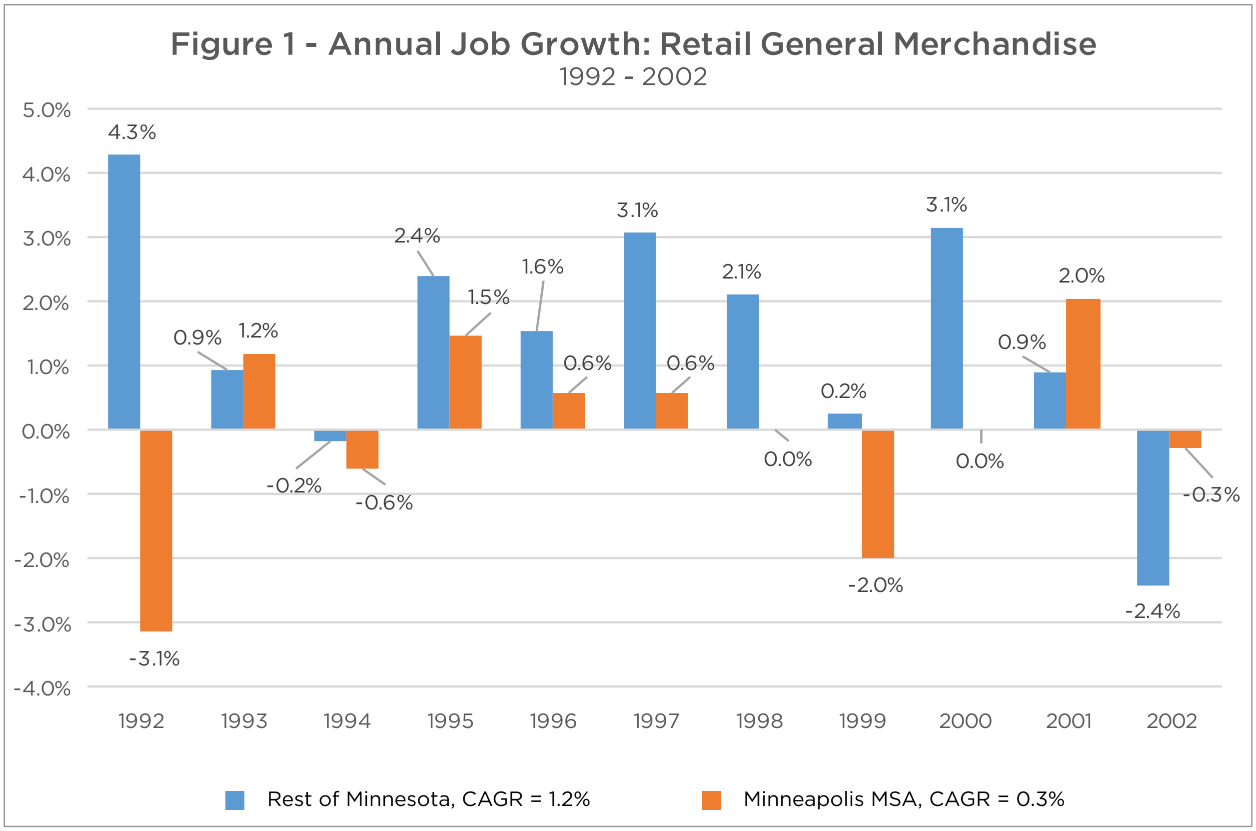
8 "Megamall won't mean big cut in jobless," The Star Tribune, June 4, 1992. (Accessed: 7/12/16.)

9 Ibid.

10 The average unemployment rate in the 12 months before August 1992 was measured at 4.6%, while the average unemployment rate in the 12 months after August 1992 was measured at 4.5%; virtually unchanged.

11 "Megamall won't mean big cut in jobless," op. cit.

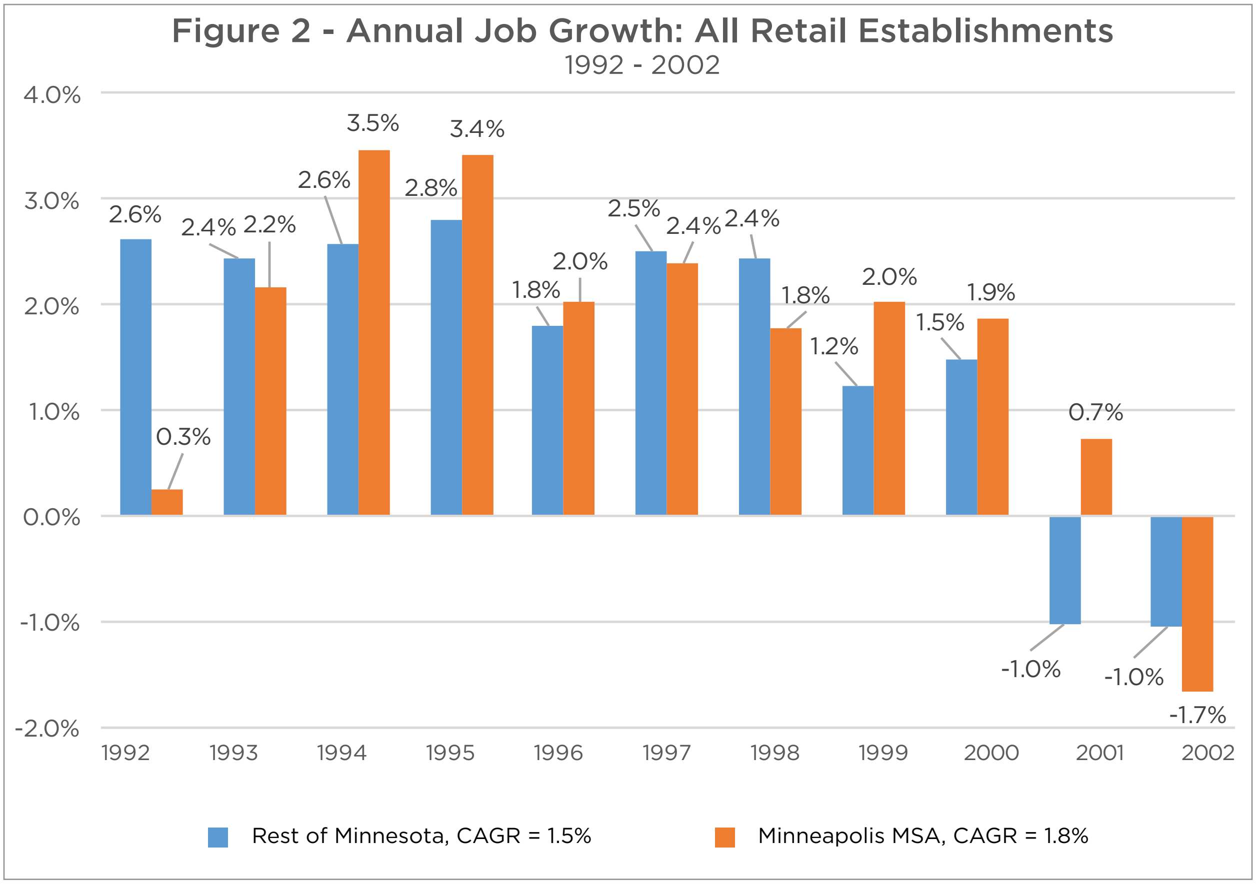
The pace of employment growth in the Minneapolis MSA during the decade after 1992 was much slower than the growth rates experienced in the metro areas of Minnesota outside of Minneapolis. Over the 10 years after the opening of MOA, the Minneapolis MSA experienced an increase of employment of just 2.9 percent in general merchandise retail stores. Over the same time period, however, employment in general merchandise retail in the rest of the state increased by 12.3 percent. Job growth in *department stores* and *other general merchandise stores* outside of Minneapolis outperformed employment growth in the Minneapolis MSA. (See Figure 1.)



Beyond department stores, small retail stores (i.e.: jewelry stores. designer clothing stores, or home décor, etc.) are also found in malls, but other retail stores are not necessarily in malls and still may thrive within the metropolitan region. The employment data from 1992 to 2002 **does not show** that employment in retail establishments (large and small) in the Minneapolis MSA experienced a meaningful net positive impact from the development of MOA. The compound annual growth rate in Minneapolis MSA for the period from 1992 to 2002 was 1.8 percent – not appreciably different from the 1.5 percent growth in the areas outside of Minneapolis (See Figure 2).[12]

Demand for retail sales and retail workers are directly correlated with population and personal income (buying power) within a market area. A comparison of the gains in retail employment between the Minneapolis MSA and the areas in the rest of Minnesota from 1992 through 2002 shows that retail employment for every 1000 residents increased at a faster pace in the areas outside the Minneapolis MSA. In 1992 there were 59 retail workers in the Minneapolis MSA for every 1,000 residents, while the

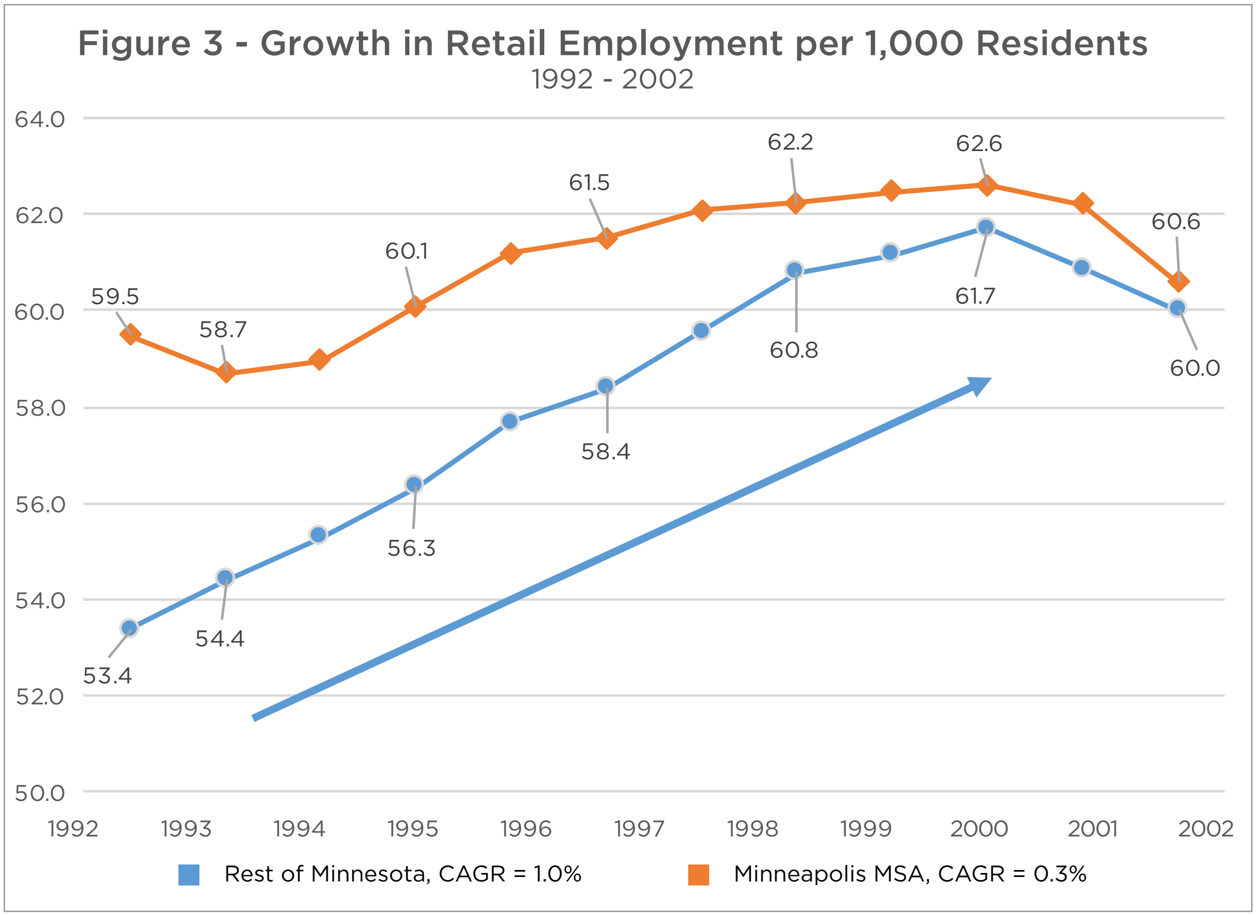
12 The difference represents 5,000 retail jobs out of 190,000 jobs in 2002.



areas outside of the MSA had only 54 retail workers per 1000 population. Ten years later there were 60 retail workers per 1000 population in the Minneapolis MSA – virtually no growth in retail workers per population. However, during the same decade, the number of retail workers per 1000 population outside of the areas of Minneapolis rose from 54 to 60, an increase of 11 percent (See Figure 3). Those areas outside of Minneapolis were able to increase retail jobs without public subsidies like those provided to MOA.

In 1992 critics of MOA argued that it was developing more retail space than the economy of the Minneapolis MSA would be able to absorb within a reasonable time period. MOAs developers argued that the mall would attract as many as 40 million of visitors a year that would not only benefit the mall, and to downtown retailers from the many visitors that would also patronize downtown retailers. The economic impact of the <u>net</u> addition of new tourists with the purpose of shopping should be evident by an increased in the ***ratio*** of retail sales to personal income in the Minneapolis MSA. A surge of retail purchases from outside visitors would tend to increase the ratio of retail sales to personal income. The data on retail sales and personal income does not show a growth in retail sales that exceeded the rise in personal income. From 1992 to 2002 sales from general merchandise establishments increased by 18.3 percent, while personal income increased by 22.5 percent; the ratio of sales to income went from 5.3 in 1992 to 5.1 in 2002.[13]

13 The increase in sales and income were both adjusted for price inflation between 1992 and 2002, and also adjusted by increases in the population within the MSA. Retail sales data is from U.S. Census Bureau, Economic Census.



Overview of Public Subsidies in the Development of Mall of America, MN and the American Dream Meadowlands, NJ.

Mall of America and American Dream Meadowlands would not have been developed but for substantial amounts of government subsidies in the form of tax rebates and public infrastructure investment. While the developers of American Dream Miami have indicated they will not seek public funding, the experience of the other similar projects they have been involved appears that that the developer has been very strategic in requesting government funding support well after the projects are underway in order to place maximum political pressure on local and state elected officials who want to realize the construction jobs or do not want to see the layoff of hundreds of construction workers.

Mall of America

The initial development and the series of expansions of Mall of America was made possible by a series of public subsidies that its developers began receiving at the mall's inception. The development plans soon after the groundbreaking in June 1989 indicated that the mall would be completed in two phases. The mall opened in the late summer of 1992, and it was soon made clear that additional public subsidies would be required to complete the second phase of the project as envisioned in 1992. Additional public subsidies have been necessary for the expansion of the mall between 2006 through 2015.

MOA received tax-increment financing since construction started on the first phase of the development. Public subsidies paid for the cost of critical infrastructure that included: land acquisition; parking facilities; site preparation; sewer, water and drainage; grading; landscaping; and construction of bridges.[14] From 1992 through 2006, MOA received public subsidies of $108 million in the form of tax breaks, most of which were from tax increment financing, and sales taxes rebates.[15] The City of Bloomington provided the tax increment financing for public infrastructure, while the State of Minnesota provided sales tax rebates on purchases generated within the mall.

In 2006 MOA sought additional public subsidies for the development of Phase II a phase that had be promised before breaking ground for Phase I. According to articles in the local press, the owners sought an additional $141 million in public financing, beyond the $106 million that The City of Bloomington had already approved for Phase II. The City Bloomington in 2006 approved an extension of the TIF for an additional 20 years for the purpose of future growth of the mall.

In the summer of 2008 MOA received "a substantial and controversial public subsidy" to spur the construction of Phase II and "provide a boost to the local economy."[16] Despite the additional subsidies from Bloomington and the state of Minnesota, progress on Phase II did not begin as quickly as was expected by legislators that supported of the economic incentive package. The package of subsidies approved by the legislature was modified from the proposal put forth by MOA and Bloomington. The modified plan approved by the legislature allowed Bloomington to impose a citywide lodging tax of up to 1 percent, create a special taxing authority within MOA that could impose a sales tax of up to 1 percent, and collect a food and beverage tax of up to 3 percent within the mall. Despite the 2008 package of subsidies, MOA noted that the incentive package would not be sufficient to build Phase II. The federal Stimulus Act of 2009 allowed the Bloomington Port Authority to issue $40.3 million in Recovery Zone (tax-exempt) Bonds, and allowed the completion of Phase II of the MOA project.

The TIF funds directed to MOA in 2011 alone accounted for 95 percent of the $7.5 million in property taxes levied on MOA. The local property tax bill after the TIF rebate was $377,000.[17] At the end, the second phase of the mall's development was completed in the fall of 2015, 22 years after MOA's groundbreaking, and with hundreds of millions of dollars in government funding support for a project which was initially conceived as a single project when the Triple Five Group first proposed the project in the 1980's.

American Dream Meadowlands

Triple Five Group is the developer of *American Dream Meadowlands,* which is located in East Rutherford, NJ and is part of the Meadowlands Sports Complex. The development has followed a similar path to that of the Mall of America; relying on substantial public subsidies and experiencing a pace of development that has frequently fallen behind initial construction schedules.

14 Program Evaluation Division, Office of the Legislative Auditor, State of Description of Selected Tax Increment Districts. Minnesota. March 1996.

15 Chris Serres, "Megamall asking for mega millions." Star Tribune, May 2, 2006. (Accessed: 7/24/2016)

16 Mike Kaszuba, "MOA expansion project is hitting a wall." Star Tribune, August 24, 2008. (Accessed: 7/27/2016)

17 "Minnesota mall's impact questioned." John Brennan, NorthJersy.com. (Accessed: 3/21/2016)

The retail/entertainment project was proposed in 2003, but the developers of the original complex filed for bankruptcy in 2007. In 2009 a successor company was not able to secure the necessary financing to move the project forward, and in July 2013 the Triple Five Group stepped in and gained control of the entire site. [18] The project was renamed the *American Dream Meadowlands*. When Triple Five took over the project, State of New Jersey public entities had already spent $80 million in roads and infrastructure that supports this project.

Recently, Triple Five Group seeks to sell $1 billion in bonds comprised of a combination of taxable bonds and tax-exempt bonds from New Jersey's Sports and Exposition Authority. *American Dream Meadowlands* will benefit from lower interest rates but also from property tax payments-in-lieu-of-taxes (PILOT) from New Jersey Economic Redevelopment and Growth program, and other sources,[19] providing incentive grants in amounts up to 75% of the annual incremental tax revenues generated by over a 20-year period. The grants and sales tax rebates will be dedicated to paying the interest and principal on the bonds.[20] While the details on the issuance of bonds had not been confirmed as of May 2016, Triple Five Group has moved its completion date to 2017. Meeting the projected date of completion is contingent on the sale of $1 billion in bonds backed by government entities and the state and local government approve the use of sales and property taxes to pay bondholders.[21] There has been substantial concern expressed by elected officials throughout the summer of 2016 in New Jersey regarding the project status and the ability to sell the bonds without further government commitments. Construction has apparently stalled until the financing plan has been settled and the bonds are issued.

Analysis of American Dream - Key Point 2.

A. Stated Premise by American Dream: No appropriately land use designated vacant land exists for American Dream Miami, and as a result the application satisfies the deficiency requirements of LU-8E and LU-8F at the County, Tier and Minor Statistical Area. The Graham Companies' application acknowledges that there are "no deficiencies on the plan map with respect to either residential or commercial land" but the Graham proposal is an example of a mixed use development that by approving the amendment it will be an "affirmation of the CDMP's intent to foster good planning."[22]

B. What the Data Actually Indicates: Enough land exists to accommodate demand for commercial use, given there is no special economic benefit from a mega–mall such as ADM in comparison to other traditional retail centers as the analysis of Key Point 1 above makes clear. Additionally, the amount of County projected Business and Office Land per 1000 residents in the Northern Tier in 2020 and 2030 is expected to exceed the amount per 1000 people countywide. As a result both applications do not meet the deficiency requirements in LU-8E and LU-8F for the American Dream and the Graham Companies.

18 "More delays at American Dream Meadowlands over money." John Brennen, et al., NorthJersey.com. April 15, 2016. (Accessed: 7/18/2016)

19 See http://www.njeda.com/financing_incentives/programs/bond_financing.

20 A portion of property and sales taxes that would typically be paid to local and state government, will be used to pay the debt service on the bonds issued for the American Dream Meadowlands. For details see: http://www.njeda.com/large_business/economic_redevelopment_growth.

21 "N.J. should not have to cough up $1B to American Dream mega-mall: opinion," Michael J. Doherty, New Jersey State Senator, representing the 23rd Legislative District.

22 Miami Economic Associates, December 14, 2015 report, page 219.

C. Discussion: The map below shows the vacant land in the Northern Tier which is currently designated for *Business and Office and Employment Center* use. The County's most recent projections have indicated that there is enough vacant commercial land in MSA 3.1, the Northern Tier and Countywide to accommodate absorption beyond the 2030 planning window.

The analysis submitted on behalf of International Atlantic LLC concurs with the County's assessment that while the County has enough land to accommodate commercial growth within the planning window, there are no large parcels with the same advantages as the parcel which is the subject of their application. It is this lack of a large enough parcel, together with the presumed special economic benefits created by ADM which the applicant claims to meet the deficiency/adequacy standards of LU-8E and LU-8F.

International Atlantic, argues that the development of ADM will translate into unique economic benefits to the County, but as our review of the history of Mall of America shows that within the first decade of operations, the mega-mall did not lead to significant job growth or other unique recurring economic benefits from 1992 to 2002. The economic benefits from MOA were small at best and more likely, virtually absent, despite receiving substantial public incentives and the benefits of public infrastructure investments.

The Graham Companies' application likewise concurs that the deficiency/adequacy standards associated with LU-8E and LU-8F are not met, but that their proposed mixed use development is "good planning." Graham Companies are essentially arguing that a private developer's good planning should trump the overall objectives carefully considered within the County's CDMP land use policies. If having larger parcels for commercial development is important, the map in Figure 4 shows that there are already six designated vacant parcels in excess of 20 acres to accommodate larger scale commercial development in the Northern Tier including two parcels already owned by one of the applicants. These six parcels are 202 acres in total and range from 28 to 48 acres.

Miami-Dade County and the broader MSA is already considered a shopping "Mecca" for domestic[23] and international visitors[24] based on the data reported by the Greater Miami Convention and Visitors Bureau[25] and recognized by the County's own Retail–Entertainment District report.[26] The region will continue to be recognized as a premier retail destination notwithstanding the development of another mall. The scale of expenditures from these international shoppers in the Miami metropolitan area has much more to do with economic conditions in the Caribbean and Latin America than the square feet of retail built in the Miami metro market. There is nothing that would indicate that the scale of development or the combination of entertainment with retail would have any unique economic benefits as the applicant's analysis has indicated, and, therefore, there is no justification for amending the land use designation just because of the project's large size.

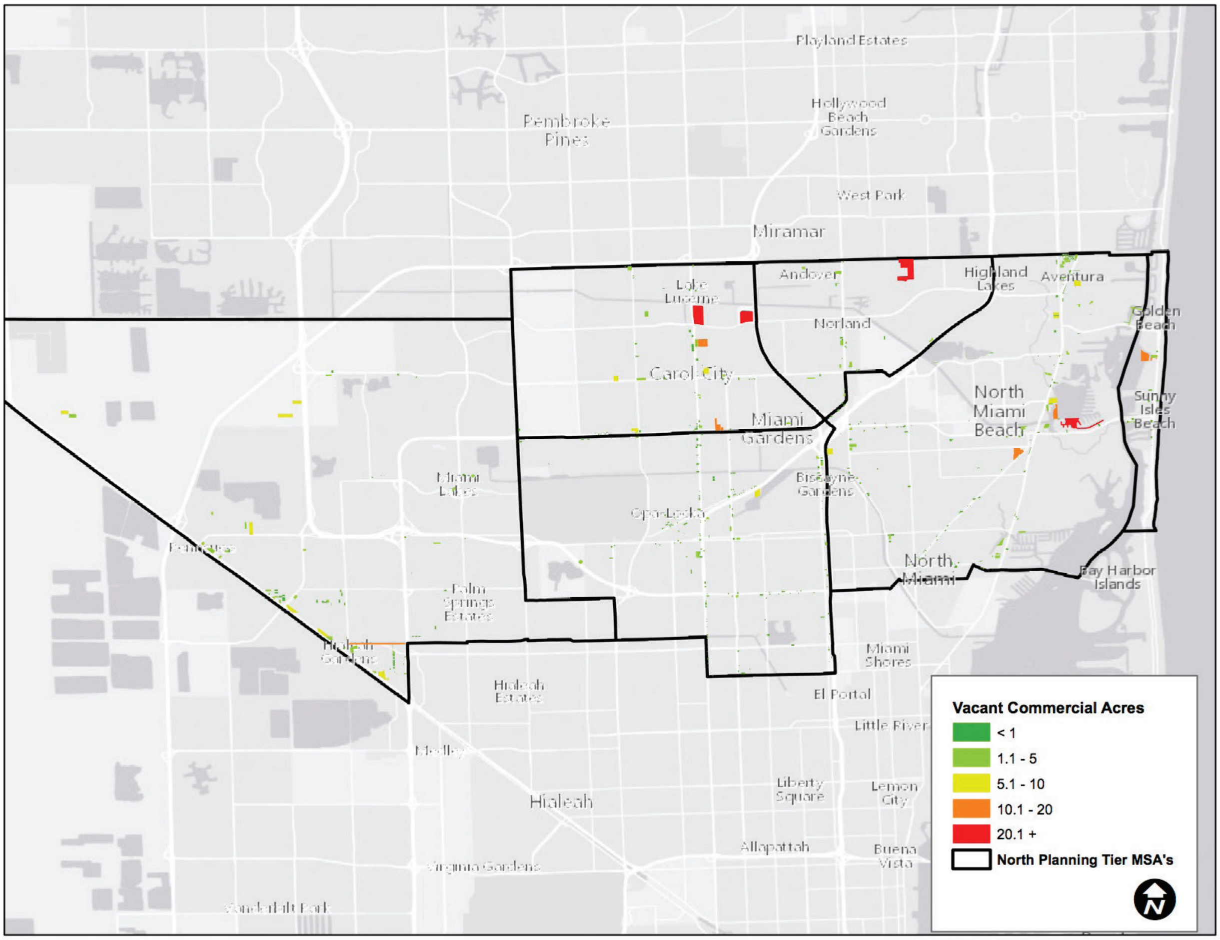
23 Domestic visitors originate from all four regions in the U.S.

24 Seventy percent (70%) of international visitors to Greater Miami come from Latin America and the Caribbean.

25 Greater Miami Convention and Visitors Bureau (2015), Visitor Industry Overview.

26 Lambert Advisory. 2002. Retail Entertainment District Report. Miami-Dade County, Planning Department.

Figure 4 - Commercial Vacant Parcels Above 20 Acres in Northern Tier



Our projections indicate that 8.45 million square feet of additional commercial built space will be absorbed in Miami Dade County between 2015 and 2020. Our projection tracks very closely to the additional 115.1 acres of land (building + parking + open area allocated to any given development), which the County projects to be absorbed annually over the same time frame.

Our analysis, however, shows that nearly 75 percent of the projected growth (6.3 million square feet) will be driven by Miami-Dade residents and Miami-Dade workers who will reside in housing and growth corridors that are well beyond Northwest Dade. We estimate that 2.2 million square feet (MSF) of the projected 8.45 MSF will be in categories such as supermarkets, pharmacies, building supplies which are not going to be tenants of any scale within a project such as ADM. This will leave 6.25 MSF which could potentially be captured by ADM. Of this amount, 75 percent will be driven by local demand rather than tourist demand, given the mall will be located in one corner of Miami-Dade County's 1,946 square miles.

International Atlantic's own projections conclude that a majority of its customers will be visitors and not locals. ADM will capture but a small percentage of this total additional demand for new space. The only way ADM could hope to lease up the space in the new mall and sustain itself is by cannibalizing demand from existing centers, just as the economic history of the Mall of America suggests from the first decade following its opening day.

Our projections of demand takes into consideration the significant deceleration of economic growth in Latin America and the Caribbean region currently affecting retail purchases from international visitors. The International Monetary Fund (IMF) is forecasting slow growth in the Latin America and Caribbean region as compared to the halcyon years from 1998 to 2007 when the compound annual growth rate for the region was 3.1 percent per year.[27] The latest forecast of growth in the region from 2016 to 2021 is 2.1 percent (two thirds the growth rate of 1998-2007). Using the IMF's forecasts of the top 10 international visitor markets for Miami-Dade County suggests that economic growth from 2016 to 2021 for the combined top 10 markets will be 1.9 percent per year compared to the 3.0 percent growth rate they experienced from 1998-2007.

Another consideration related to higher value commercial development is the fact that vacant land is far from the only option for developments such as ADM. Vacant land in the County is becoming increasingly scarce. A property that is currently occupied by an existing use does not mean that it is not available for redevelopment at higher value/higher density. This option is actually being exercised throughout the County as the amount of vacant land recedes. A vacant parcel does not necessarily translate into that parcel being the best and most appropriate parcel for development from an economic or financial perspective.

Redevelopment of parcels with active development on them are commonplace in urban areas. Such parcels are candidates for redevelopment at higher densities or with higher investment value because they meet the necessary land use designation, are particularly well located in relation to the broader market and often times have the access and transportation network already in place to support higher density development without the imposition of additional offsite costs.

As it relates to ADM, the Calder Race Track site is an example of a property with the appropriate land use designation for commercial use, is larger than the property now controlled by International Atlantic, and has excellent access to the highways and the regional market. Calder has already actively marketed 60 acres of its 250 acre parcel for sale and there has been broad speculation in the local real estate community that the entire 250 acres may be available for purchase given the proximity and challenging competitive positioning of Calder in relation to other pari-mutuel casinos in Miami-Dade and Broward County. Additionally, Calder is in the immediate orbit of the Seminole Hard Rock Casino which has a competitive advantage due to its monopoly on table gaming in South Florida region.

Analysis of American Dream/The Graham Companies, Key Point 3.

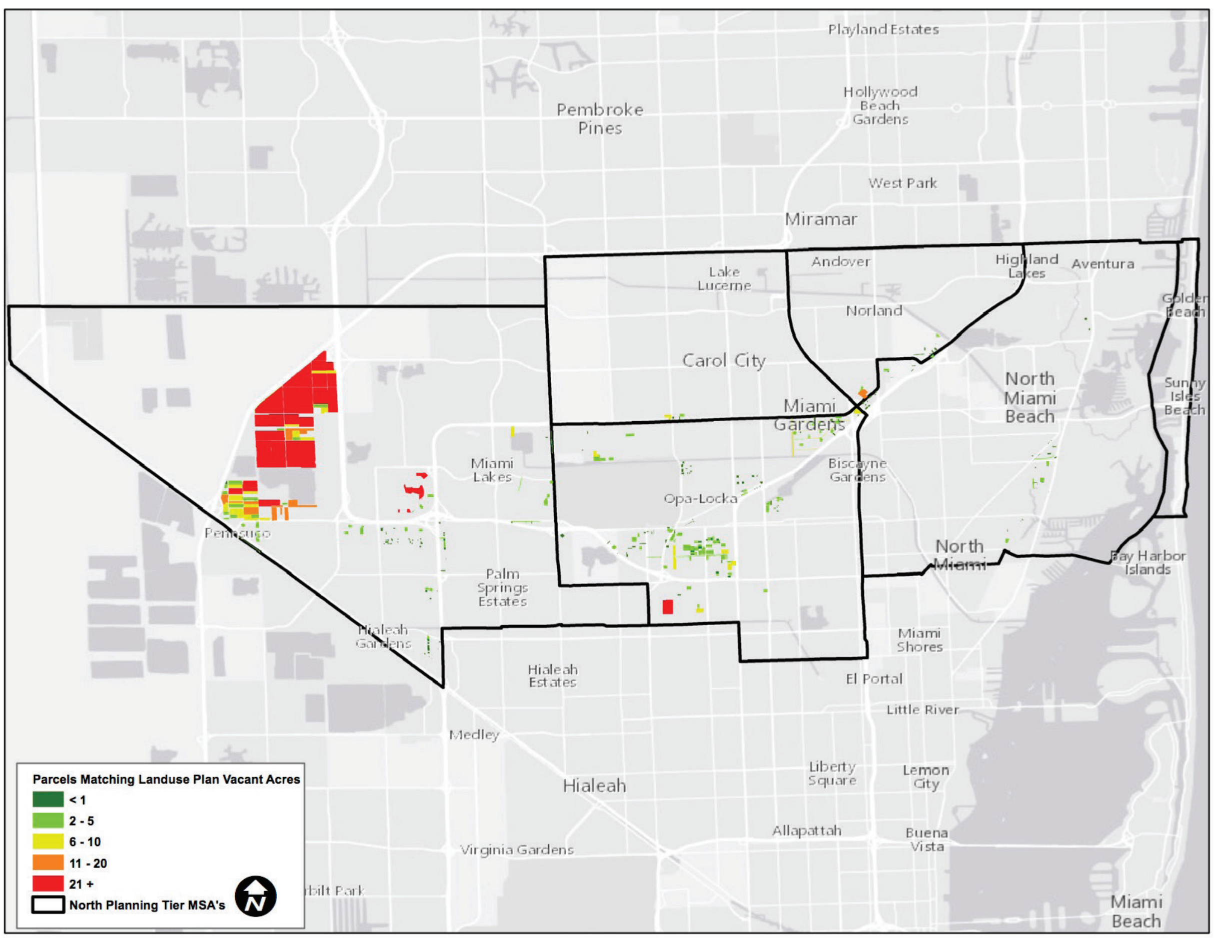
A. American Dream's Premise: Adequate *Industrial and Office* designated vacant land exists in the Planning MSA 3.1, the Northern Tier, and Countywide to accommodate absorption nearly to 2040, well beyond the CDMP's planning window even once the two parcels proposed for modification are re-designated.

27 International Monetary Fund. World Economic Outlook: April 2016.

B. What the Data Actually Indicates: While on an exclusively quantitative basis there is adequate land to accommodate demand from industrial users in the Northern Tier of the County for the foreseeable future. On a practical level there are only two adequate vacant consolidated land holdings which could accommodate modern industrial park development with modern users in the Northern Tier if the two proposed developments are provided a re-designation of their land use. As a result, if the proposed land use amendment was to be approved, the Northern Tier would fail the adequacy test of LU-8F and the applicant has not demonstrated that the modification will not have a significant adverse impact on future industrial development.

C. Discussion: The map below shows all vacant parcels in the Northern Tier by size of parcel which are designated for *Industrial* and *Office* use. Industrial space will generally be developed only on vacant land and will not displace other uses on any scale given that it is on the lower end of the property valuation spectrum and cannot be easily integrated with other uses such as residential and is therefore allocated to discrete dedicated zones.

Figure 5 - Only Two Large Parcels Available for Industrial Development in Northern Tier If Land Use Amendment Approved



Of the 1,882 vacant acres[28] in the Property Appraisers database which are designated for *Industrial and Office* use, in the Northern Tier, 705 acres are in individual parcels or adjacent land holdings of multiple parcels under common ownership less than 20 acres in size and half of those acres are less than five acres in size. These parcels/adjacent holdings are scattered throughout the Northern Tier and are not appropriate for most modern distribution or manufacturing uses which need excellent highway access and are generally developed in modern business parks with appropriately designed roadways to accommodate for truck turning radiuses and efficient dock height loading for off-street unloading and loading of product and materials.

Indeed, there are only six parcels/adjacent holdings which account for 1,038 acres (or 55% of total industrial designated land in the Northern Tier) and are larger than 50 acres in size. Of these, four of the six parcels are the subject of The Graham Companies or International Atlantic's application to the County. As a result, if the land use amendment is approved, the County will have only two vacant parcels/adjacent holdings in the entire Northern Tier of the County that will be able to accommodate modern industrial park development. While one of the parcels is a large 453 acres owned by FDG Beacon Countyline, LLC and the other is relatively small and a poorly positioned 68 acres parcel owned by AMB I75, LLC. If any barrier to developing these properties were to exist such as an environmental or legal issue, the County will be left with only one or potentially no property in the entire Northern Tier able to accommodate modern industrial park development going forward.

This runs in direct contrast of the County's objective to insure that a balance of development and associated employment creation occurs throughout the County as demand warrants.

While preserving large sites for industrial development may on the face of it, appear to be the same argument that ADM is making as their need for a large site, which does not exist for a mega-mall development, in fact the arguments are very different.

In the case of the industrial land, modern industrial development in the Northern Tier cannot move forward if there are not enough adequate large sites to accommodate that development. In the case of ADM, there are a number of large and more moderate sized sites to accommodate modern commercial development, only not a vacant site large enough to accommodate a mega-mall. Yet, as the assessment of the historical economic impacts of MOA makes perfectly clear, there is no inherent economic benefits from a mega-mall vs. any other mall or retail center. As a result, an amendment would just be consolidating development and subsequent retail sales on one property which has no net-benefit to the County and actually will cannibalize from other retail centers which are currently vibrant and serve the commercial needs of surrounding neighborhoods in close proximity.

28 This compares closely to 1,627 vacant acres identified by the Planning Department although the difference in vacant designated acreage has no appreciable impact on the analysis.

ABOUT THE AUTHOR

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