

**Transportation Related Agency Correspondence for App. 5 and 6 – updated through November 2016**

- November 17, 2015 Department of Transportation and Public Works (DTPW) Response to Leftwich Consulting Engineers, Inc. (LCE) Responses to October 23, 2015 DTPW Comments on Transportation Impact Analysis (TIA) Methodology
- November 24, 2015 Technical Memorandum Addendum on Methodology for Transportation Impact Analysis (TIA) submitted by LCE
- Applicant's TIA for American Dream Miami & Graham Project, dated Dec. 22, 2015 – received December 30, 2015 *[posted separately on RER, Planning Division website, under November 2015 cycle]*
- January 19, 2016 Email from Florida Department of Transportation (FDOT) Providing Comments on TIA Report dated December 22, 2015
- January 21, 2016 Email from Town of Miami Lakes Providing Comments on TIA Report dated December 22, 2015
- January 22, 2016 Regulatory and Economic Resources Department (RER) and DTPW Comments on TIA Report dated December 22, 2015
- January 25, 2016 Broward County Letter Providing Comments on TIA Report dated December 22, 2015
- January 28, 2016 FDOT Letter Providing Comments on TIA Report dated December 22, 2015
- February 2, 2016 City of Miramar Letter Providing Comments on TIA Report
- February 9, 2016 RER Email and table regarding pending/approved plats
- February 23, 2016 Applicant Email Revising Table 6, Trip Generation Summary for ADM
- Feb. 25, 2016 DTPW Comments on Revised Trip Generation Summary and Additional Information
- March 7, 2016 FDOT Letter Providing Comments on Trip Generation Summary for American Dream Miami
- March 14, 2016 LCE Technical Memorandum Providing Responses to Comments on Revised Trip Generation for American Dream Miami
- March 24, 2016 FDOT Letter Providing Comments on LCE Technical Memorandum dated March 14, 2016

Source: Department of Regulatory and Economic Resources (RER), Planning Division, November 2016

**Transportation Related Agency Correspondence for App. 5 and 6 – updated through November 2016**

- June 22, 2016 LCE Letter – Comment Set and Responses
- August 5, 2016 FDOT Letter Providing Comments on the ADM/Graham Companies Revised Transportation Impact Analysis (TIA) Report dated June 22, 2016
- August 26, 2016 Florida Turnpike Enterprise E-mail Providing Comments on the ADM/Graham Companies Revised TIA Report dated June 22, 2016
- September 1, 2016 Broward County Letter Providing Comments on the ADM/Graham Companies Revised TIA Report dated June 22, 2016
- September 7, 2016 DTPW and RER Comments on the ADM/Graham Companies Revised Transportation Impact Analysis (TIA) Report dated June 22, 2016
- September 7, 2016 LCE Letter – Comment Set and Responses
- September 12, 2016 City of Miramar Letter Providing Comments on the ADM/Graham Companies Revised TIA Report dated June 22, 2016
- September 13, 2016 Town of Miami Lakes Email Providing Comments on the ADM/Graham Companies Revised TIA Report dated June 22, 2016
- September 14, 2016 Florida Turnpike Enterprise E-mail Revised Comments on the ADM/Graham Companies Revised TIA Report dated June 22, 2016
- September 20, 2016 LCE Letter – Comment Set and Responses as of September 20, 2016
- October 7, 2016 LCE Letter – Comment Set and Responses with Final Revisions/Notes
- October 24, 2016 City of Miramar E-mail and attachment – Development Activity as of October 2016
- November 9, 2016 DTPW Miami-Dade Transit – Transit Impact Report, Revision No. 7

## Stillings, Noel (RER)

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**From:** Shen, Joan (PWWM)  
**Sent:** Tuesday, November 17, 2015 4:27 PM  
**To:** 'Scot Leftwich, Ph.D., P.E.'  
**Cc:** 'Robert Gorlow'; 'Andre Groenhoff'; 'James Taylor'; Miguel Diaz de la Portilla; Osterholt, Jack (Office of the Mayor); Woerner, Mark (RER); Khan, Muhammad (PWWM); Patino, Myra (PWWM); Eymil, Yelenys (PWWM)  
**Subject:** RE: American Dream Miami  
**Attachments:** Response to Muhammad Khan\_101615-responses.docx

Good afternoon Dr. Leftwich,

Attached, please find our responses in blue.

Thank you,

**Joan Shen**, Ph.D., P.E., PTOE, Chief  
Traffic Engineering Division  
Miami-Dade County Department of Transportation and Public Works  
111 NW 1st Street, Suite 1510, Miami, FL 33128  
Phone: 305-375-2030, Fax: 305-372-6064  
<http://www.miamidade.gov/pubworks/>

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**From:** Scot Leftwich, Ph.D., P.E. [mailto:scot.leftwich@lce-fl.com]  
**Sent:** Monday, October 26, 2015 6:16 PM  
**To:** Khan, Muhammad (PWWM); Osterholt, Jack (Office of the Mayor); Shen, Joan (PWWM)  
**Cc:** 'Robert Gorlow'; 'Andre Groenhoff'; 'James Taylor'; Miguel Diaz de la Portilla  
**Subject:** FW: American Dream Miami

Muhammad

Thank you for your comments. Attached are our responses to your comments.  
Scot

D. Scot Leftwich, Ph.D., P.E.  
President  
Leftwich Consulting Engineers, Inc.  
12151 Science Drive Suite 101  
Orlando, Florida 32826

Telephone: (407) 281-8100 ext 203  
Facsimile: (407) 249-2212  
Mobile: (407) 406-4455

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**From:** Khan, Muhammad (PWWM) [<mailto:khanm@miamidade.gov>]  
**Sent:** Friday, October 23, 2015 2:50 PM  
**To:** Scot Leftwich, Ph.D., P.E. <[scot.leftwich@lce-fl.com](mailto:scot.leftwich@lce-fl.com)>; 'James Taylor' <[jmt@lce-fl.com](mailto:jmt@lce-fl.com)>  
**Cc:** Shen, Joan (PWWM) <[joans@miamidade.gov](mailto:joans@miamidade.gov)>; Patino, Myra (PWWM) <[patinom@miamidade.gov](mailto:patinom@miamidade.gov)>; [andre.groenhoff@gmail.com](mailto:andre.groenhoff@gmail.com); Eymil, Yelenys (PWWM) <[Yele@miamidade.gov](mailto:Yele@miamidade.gov)>; Brown, Helen (RER) <[HFB@miamidade.gov](mailto:HFB@miamidade.gov)>  
**Subject:** RE: American Dream Miami

Good afternoon Scot/James,

Nice talking to you this morning in the meeting. As discussed, we reviewed the material and offer some additional comments below:

- 1) As commented before, we have concerns regarding 14% pass by trips. Was there any pass-by trip data collected for MOA site to support it. It is recommended that this rate should be reduced.
- 2) The size of about 1.5 million-SF of entertainment uses in ADM appears significantly higher than MOA. Therefore, it is expected to create its own separate trip generation apart from retail. Please revise trip generation accordingly.
- 3) Vehicle occupancy rates are not mentioned. If they are available they can be used to support trip generation by applying to estimated persons/customers of ADM project.
- 4) Provisions should be kept in planning and design phases for right-of-ways and space to accommodate any future rail or transit service with dedicated travel way.
- 5) Based on review of slide 18, if the vehicles were tube counted for MOA, then no transit or non-motorized reductions should be made.
- 6) No discussion is provided regarding the parking demand.
- 7) We are working in coordination with our RER department for the stations' traffic data and will provide you soon.

Should you have any questions or need additional information, please contact us at the number below.

Regards,

Muhammad Asif Khan, P.E., PTP, PTOE, Professional Engineer  
Traffic Engineering Division  
**Miami Dade County**  
**Department of Transportation**  
**and Public Works**

111 NW 1st Street, Suite 1510, Miami, Florida, 33128-1970

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*Please consider the environment before printing this email.*



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**From:** Scot Leftwich, Ph.D., P.E. [<mailto:scot.leftwich@lce-fl.com>]  
**Sent:** Wednesday, October 21, 2015 4:20 PM  
**To:** Shen, Joan (PWWM); 'James Taylor'  
**Cc:** Khan, Muhammad (PWWM); Patino, Myra (PWWM); [andre.groenhoff@gmail.com](mailto:andre.groenhoff@gmail.com)  
**Subject:** RE: American Dream Miami

Thank you  
Scot

D. Scot Leftwich, Ph.D., P.E.  
President  
Leftwich Consulting Engineers, Inc.  
12151 Science Drive Suite 101  
Orlando, Florida 32826

Telephone: (407) 281-8100 ext 203  
Facsimile: (407) 249-2212  
Mobile: (407) 406-4455

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**From:** Shen, Joan (PWWM) [<mailto:joans@miamidade.gov>]  
**Sent:** Wednesday, October 21, 2015 2:44 PM  
**To:** 'James Taylor'  
**Cc:** 'Scot Leftwich, Ph.D., P.E.'; Khan, Muhammad (PWWM); Patino, Myra (PWWM)  
**Subject:** RE: American Dream Miami

Hi James,

Below is the contact information for Muhammad Khan and Myra Patino:

Muhammad Asif Khan, P.E., PTP, PTOE,  
Traffic Engineering Division  
**Miami Dade County**  
**Department of Transportation and Public Works**  
111 NW 1st Street, Suite 1510, Miami, Florida, 33128-1970  
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Myra Patino, P.E.  
Traffic Engineering Division  
**Miami Dade County**  
**Department of Transportation and Public Works**  
111 NW 1st Street, Suite 1510, Miami, Florida, 33128-1970  
Phone: 305-375-1682 - Fax: 305-372-6064  
Email: [patinom@miamidade.gov](mailto:patinom@miamidade.gov)

Thank you,

**Joan Shen, Ph.D., P.E., PTOE, Chief**

Traffic Engineering Division  
Miami-Dade County Public Works and Waste Management  
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**From:** James Taylor [<mailto:jmt@lce-fl.com>]  
**Sent:** Wednesday, October 21, 2015 10:30 AM  
**To:** Shen, Joan (PWWM)  
**Cc:** 'Scot Leftwich, Ph.D., P.E.'  
**Subject:** American Dream Miami

Dr. Shen,

Dr. Leftwich and I would like to schedule some time this afternoon to follow up on the TIA methodology for the American Dream Miami, as well as begin coordination of directional count data for use in the TIA.

Could we get half an hour with you today at 1P?

Regards,  
James

-----  
James M. Taylor, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Tel: (407) 281-8100, ext. 205  
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**AMERICAN DREAM MIAMI  
MIAMI-DADE CDMP TIA METHODOLOGY  
COMMENT SET & RESPONSES  
Muhammad Khan October 26, 2015**

Dear Mr. Kahn;

Thank you for your email comments following the last methodology conference on Monday October 23, 2015. We delved much deeper into the trip generation studies and rationale for our approach at our prior methodology conference on September 21, 2015, which I believe you did not attend. We had a robust discussion on many of the concerns you raised which would have been helpful to you. That is perhaps why Dr. Shen was generally on board with our approach during the conference call on October 21, and we did not hear any comments when Jack Osterholt asked if there were any additional questions regarding the trip generation at the meeting on October 23.

Nonetheless, we want to address any concerns you may have going forward as we have done below. Please understand that respectfully we must move forward with our analysis based on the general consensus of the reviewing agencies to date in order to meet our November 30 submission deadline. Any corrections or valid revisions will have to be considered during the review process. We look forward to working with you and other reviewing agencies throughout the CDMP and subsequent traffic studies and interchange proposals related to the American Dream Miami.

- 1) As commented before, we have concerns regarding 14% pass by trips. Was there any pass-by trip data collected for MOA site to support it. It is recommended that this rate should be reduced.

*A specific pass-by study was not conducted at MOA for either their own expansion study or our American Dream Miami project. It should be noted that the pass-by rate was derived from ITE's Trip Generation for retail centers (ITE 820) and only calculated based on the retail GLA. There is no reason to assume it should be different here than for any other retail shopping center. In the past, DRI's for shopping centers located in Florida and along freeways have also applied the ITE pass-by rates and once off the freeway mainline treated them as "link-diverted" trips, thus having the same impact on the interchanges and access roads as a new trip. We really don't see any supported rationale to treat this center differently.*

The response is acknowledged. However, as it was discussed in a previous conference call over the phone, most of the pass-by trips are anticipated from FDOT roadways, therefore, approval should be obtained from FDOT prior to using this percentage. Furthermore, for any pass-by trips along the County roadway system, it may be reviewed and commented during CDMP TIA review phase.

- 2) The size of about 1.5 million-SF of entertainment uses in ADM appears significantly higher than MOA. Therefore, it is expected to create its own separate trip generation apart from retail. Please revise trip generation accordingly.

*The Applicant has considered all alternative sites that reviewers to date has presented for use and concluded that MOA is the closest model to ADM that exists to best forecast ADM trip generation based on the size, mix, trip type and design. The primary trip purpose at MOA remains overwhelmingly "shopping". Based on the Cambridge Systematics 2012 study it was 68% shopping, and another mixed 7% of shopping and other purposes (total 75%). Therefore the primary driver of the trip generation is the retail component and the same will be true of ADM to be operated under same owner.*

*One difference anticipated between the MOA and ADM ancillary entertainment trips, however, is vehicle occupancy. Florida entertainment facilities and theme parks have much higher vehicle occupancy rates than reported at MOA. The range is from 2.3 at MOA and is reported near 4.0 at theme parks in Central Florida. Therefore, if we increased a small portion of the trips for entertainment as you suggest, and then use internal capture matrices and apply the higher occupancy rates for Florida to all entertainment trips, the trip total is less. We opted to keep the rate conservative and avoid multiple adjustments up and down that may be questionable. Also, please keep in mind many of the entertainment uses measure large, but have significant unusable areas such as a 100,000 sf submarine lake, and a 65,000 sf outdoor fishing lake. We did not adjust MOA rates for use at ADM for these reasons.*

The response is not accepted. The sizes of different uses in MOA and ADM are proportionally different. Such as, the entertainment and hotel uses are significantly high in ADM as compared to retail size of the mix. Therefore, we recommend that trip generation be revised for CDMPTIA.

- 3) Vehicle occupancy rates are not mentioned. If they are available they can be used to support trip generation by applying to estimated persons/customers of ADM project.

*Please see the response to comment (2). At MOA it ranges from 2.1 for resident trips (within 150 miles) and 3.6 for Non-Resident trips (beyond 150 miles) with a weighted average of 2.3 persons per vehicle. These rates are already reflected in the trip counts taken at MOA. Note again that the average vehicle occupancy for theme entertainment centers in Florida is higher which if applied would lower our trip generation.*

The response is accepted.

- 4) Provisions should be kept in planning and design phases for right-of-ways and space to accommodate any future rail or transit service with dedicated travel way.

*As you suggest we are planning to incorporate a transit center within the parking system such as at MOA along with having an FDOT Park-and-Ride lot just off the exit ramps from I-75/HEFT. At this stage we are seeking land use and will be able to more accurately respond when developing the site plan. The developers have historically placed great value on transit access and services.*

The response is accepted.

- 5) Based on review of slide 18, if the vehicles were tube counted for MOA, then no transit or non-motorized reductions should be made.

*That is correct. The bus transit and other shared vehicle modes are inherent in the trip rates. The LRT adjustment was "added" to the trip rates to account for a lack of light rail transit within our planning horizon and based on the current 2040 LRTP.*

The response is accepted.

- 6) No discussion is provided regarding the parking demand.

*Parking will be addressed at the site plan review. Please keep in mind that most parking will be provided in structures as is the case at MOA.*

The response is accepted.

- 7) We are working in coordination with our RER department for the stations' traffic data and will provide you soon.

*We look forward to reviewing County's existing an historical count data and vested trips, by direction, for use in the CDMP TIA.*

The 2014 data and some detailed are already provided. We are further coordinating with the County's RER department for analysis and information.

**American Dream Miami  
MIAMI-DADE COUNTY, FLORIDA**

**TECHNICAL MEMORANDUM  
Methodology for Transportation Impact Analysis (TIA)  
for Comprehensive Development Master Plan (CDMP) Amendment**

**ADDENDUM**

Prepared by:  
**Leftwich Consulting, Inc.**  
12151 Science Drive, Suite 101  
Orlando, Florida 32826

**November 24, 2015**

## 1.0 PURPOSE FOR ADDENDUM

Subsequent to the Methodology Meetings of September 3, 2015 and October 23, 2015 the American Dream Miami Applicant (International Atlantic, LLC) responded to comments from the reviewing agencies and other participating jurisdictions. During this process, the Graham Companies, owners of the adjoining properties to the south, made it known that they were going to submit a CDMP for the approximate 300 acres concurrently with the American Dream Miami. This presented a number of challenges related to coordination of traffic study methodology and consistency of SERPM model data and analysis of common study area roads.

After discussing the traffic studies required for the two contiguous but separate CDMP applications with representatives from International Atlantic LLC, the Graham Companies, and Miami Dade County, it was agreed that while these are two independent CDMP applications it would be best to address the traffic impacts in a single traffic study. This study will now include both developments while separating the output data to identify discreet impacts of each development on each roadway facility being studied.

All technical aspects of the study methodology previously presented and reviewed will generally remain the same. **Figure 1** shows the proposed location of American Dream Miami and the Graham Companies Project.

## 2.0 STUDY AREA

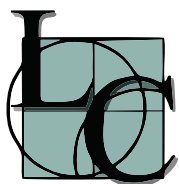
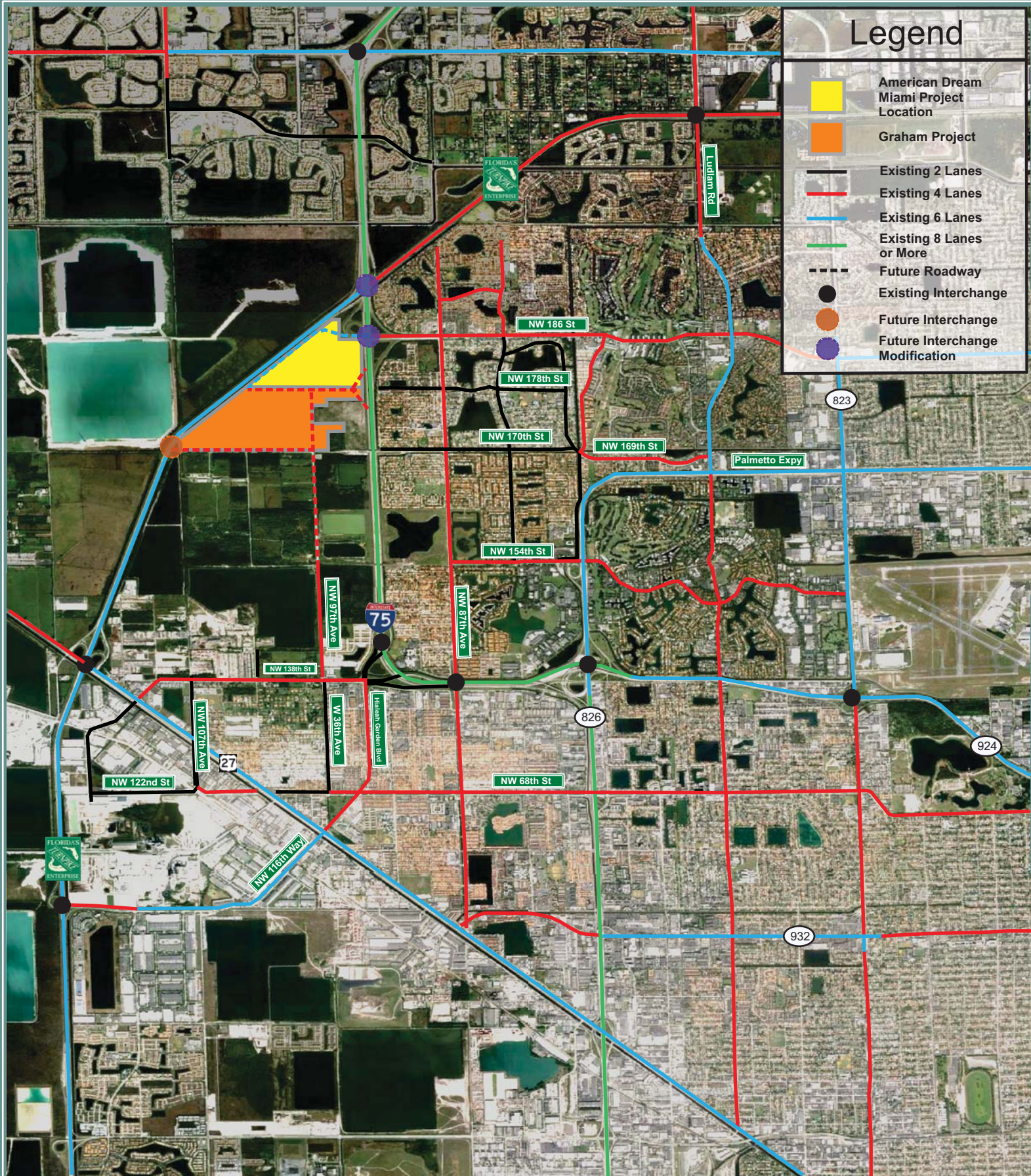
The study area for the TIA will be defined in terms of degree of project traffic impacts on the surrounding roadway networks. Specifically, the TIA analysis will extend to all State and County roadways where external trips are forecast to be equivalent to or greater than five percent (5%) of the maximum service volume (MSV) at the adopted level of service (LOS) standard for each facility. Local collectors roadways proximate to the Project will also be included.

The study area for the TIA will be defined by first determining the study areas for each project (Graham Project and American Dream Miami) separately. Then, the two study areas will be overlaid and the maximum outer boundary of the two study areas will form the final study area.

## 3.0 SITE ACCESS

American Dream Miami and the Graham Project intends to seek access to an extension of Miami Gardens Drive, Interstate 75 and Florida's Turnpike via a future interchange at NW 170<sup>th</sup> Street. **Figure 2** includes a preliminary access plan for the two Projects which may be subject to change in the TIA as project access needs are further analyzed.





# Project Location Map

**American Dream Miami / Graham Project**

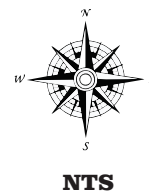




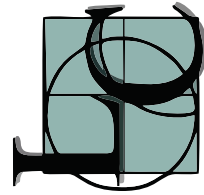
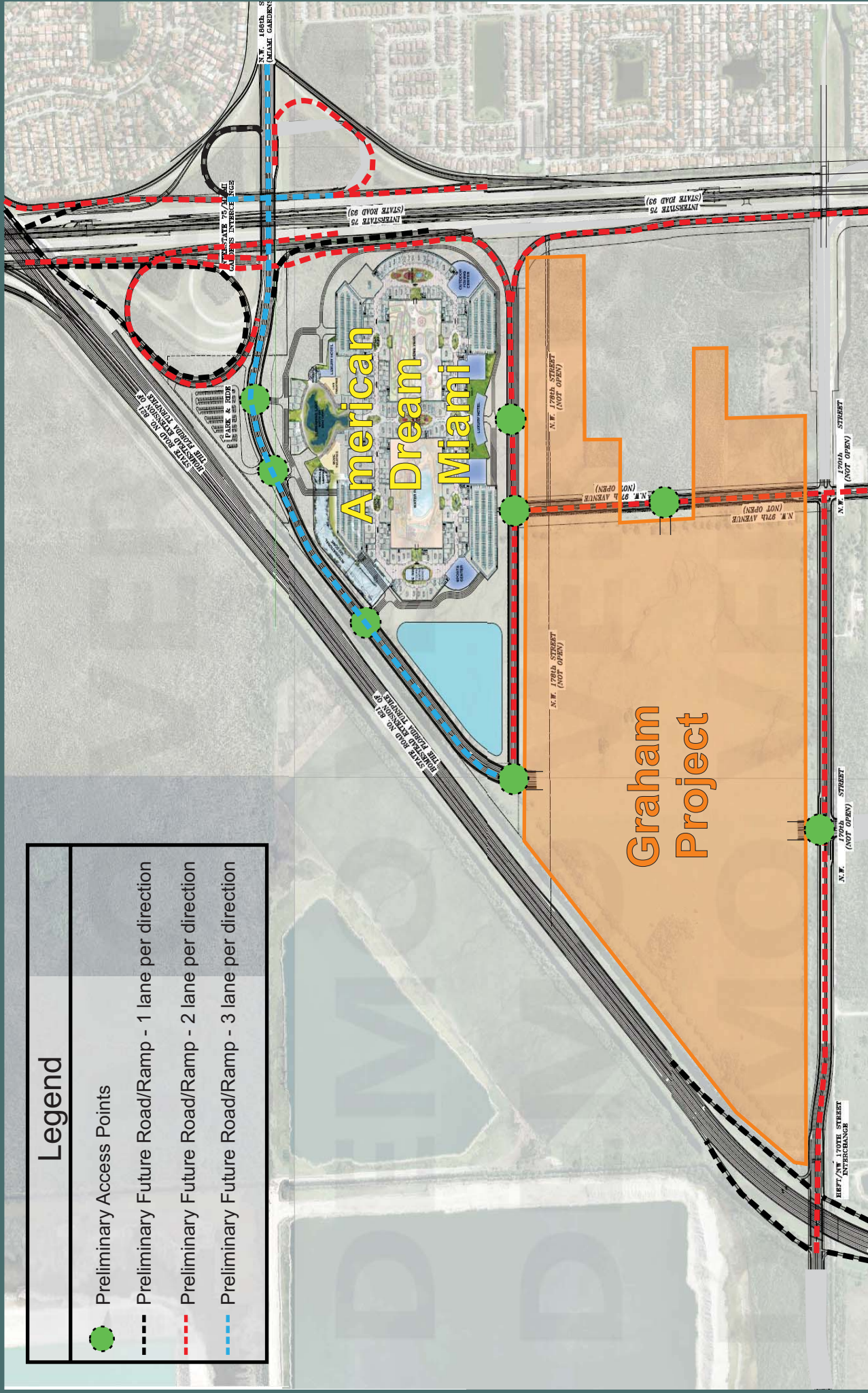


Figure:

**1**



Legend	
	Preliminary Access Points
	Preliminary Future Road/Ramp - 1 lane per direction
	Preliminary Future Road/Ramp - 2 lane per direction
	Preliminary Future Road/Ramp - 3 lane per direction



## Preliminary Access Plan

### American Dream Miami / Graham Project

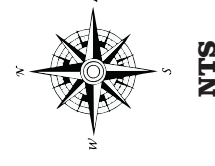


Figure:

2

## 4.0 TRIP GENERATION FOR GRAHAM PROJECT

Trip generation associated with the Graham Project for the analysis years 2020 and 2040 has been forecast per Institute of Transportation's (ITE) methodology as outlined in the Trip Generation Manual, 9<sup>th</sup> Edition. In Year 2020, the project estimates a partial build-out of uses to include 150 ksf of commercial use, 250 ksf of business park use, and 500 multi-family dwelling units. In Year 2040, full 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, and for each year, a pass-by trip reduction was applied to the amount of net external project trips generated by the retail uses. This percent reduction was derived from the ITE fitted curve equation for ITE Land Use 820 (Shopping Center) per ITE's Trip Generation Handbook. The quantity of pass-by trips was then deducted from net external trip quantities to derive the new external trips generated by the site. **Table 1** presents the Daily and PM peak hour trip generation summary for the Graham Project for Years 2020 and 2040.

**Table 1: Trip Generation Summary for Graham Project**

Graham Project (2020)	Land Use	ITE Code	Size	Units	Trip Rates		Trip Forecast	
					Daily	PM Peak	Daily	PM Peak
	Commercial	820	150	KSF	58.93	5.24	8,840	786
	Business Park	770	250	KSF	13.48	1.35	3,370	338
	Multi-Family Apartment	220	500	DU	6.31	0.59	3,155	295
	Total Generated Trips						15,365	1,419
	PM Internal Capture =	15.1%	of net external trips				2,317	214
	Net External Trips						13,048	1,205
	Passerby Trips =	35.0%	of ext'l comm'l trips				2,588	239
New External Trips						10,460	966	
Graham Project (2040)	Land Use	ITE Code	Size	Units	Trip Rates		Trip Forecast	
					Daily	PM Peak	Daily	PM Peak
	Commercial	820	1,000	KSF	30.33	2.80	30,330	2,800
	Business Park	770	3,000	KSF	10.86	1.05	32,580	3,150
	Multi-Family Apartment	220	2,000	DU	6.12	0.56	12,240	1,120
	Total Generated Trips						75,150	7,070
	PM Internal Capture =	10.8%	of net external trips				8,121	764
	Net External Trips						67,029	6,306
	Passerby Trips =	20.0%	of ext'l comm'l trips				5,172	487
	New External Trips						61,857	5,819

## 5.0 CDMP TIA ANALYSIS

The combined CDMP TIA analysis will be performed as outlined in the submitted Methodology Statement (dated September 3, 2015) and subsequent comment responses drafted to address agency review comments. Trips for American Dream Miami and the Graham Project will be tracked separately in the analysis, but will be combined to determine full impact of both projects together.



## Stillings, Noel (RER)

---

**From:** Colmenares, Lisa <Lisa.Colmenares@dot.state.fl.us>  
**Sent:** Tuesday, January 19, 2016 4:47 PM  
**To:** Stillings, Noel (RER); Woerner, Mark (RER); Isabel Cosio Carballo  
**Cc:** Dykstra, Lisa; Lampley, Paul; Lyn, Neil; Wong, Chon; Fox, Randy; Meitin, Omar; Filer, Carl  
**Subject:** RE: American Dream Miami and Graham Properties Applications - Traffic Report Available

Noel & Mark:

Good afternoon. The Florida Department of Transportation, District Six, in cooperation with District Four, completed a joint review of the submitted transportation impact analysis for the American Dream Miami (ADM) and The Graham Project developments, which is dated December 22, 2015.

As discussed with the County, we would like to submit the comments that we have collected, in order to see if they can be resolved at the methodology meeting scheduled for January 22<sup>nd</sup>, 2016 at the South Florida Regional Council Offices at 2:00 PM. After the meeting, the Department will be submitting formal comments, if necessary.

Based on the joint CDMP traffic analysis submitted, the following comments are offered.

### General Comments

- 1) Several transportation improvements projects are relied upon to demonstrate adequate public facilities are present by 2020 to accommodate the expected travel demand generated by ADM and Graham Project. These include an interchange modification at HEFT and I-75; a new interchange at HEFT and NW 170<sup>th</sup> Street; a partial new interchange at I-75 and NW 178<sup>th</sup> Street; and an interchange modification at I-75 and Miami Gardens Drive. Each of these interchange improvements ultimately requires FDOT and FHWA approval.

If any of the interchange improvements fail to be approved and/or constructed by 2020, the base transportation network that is the foundation of ADM and Graham Project's traffic analysis is invalid. This would result in additional transportation impacts to area roadways that were not analyzed. Therefore, it is recommended that a condition of approval be included for the ADM and Graham Project CDMP submittals contingent upon obtaining the requisite FDOT and FHWA approvals for the proposed interchange access changes. If any of the relied upon transportation improvements are not approved, a re-evaluation of the traffic impact analysis will be necessary.

- 2) In Table 8, there are projects funded in Priority IV and assumed to open in different years. Please provide clarification about how the Applicant intends to advance these projects such that they are constructed by the year used in the traffic analysis. The funding source and commitment must be clarified for these improvements.

### Section 5.0 - Trip Generation

- 3) Regarding the pass-by trip percentages from ITE code 820: Shopping Center, The Graham Property uses 35% in 2020 (150 KSF) and 20% in 2040 (1,000 KSF). ADM uses 14% (3,500 KSF). There is no fitted curve in the 3<sup>rd</sup> edition of the ITE Handbook (latest version), and there is no evidence to suggest that the curve would flatten

at 900 KSF, beyond which there are only four data points. A fitted curve for this data would most likely be under 20% for the 2040 Graham property and below 10% for the ADM (which would be 3 graph lengths away from the end of this plot). Basing the pass-by rate on the three data points over 1,000 KSF is not a statistically valid methodology. A more appropriate methodology would utilize a curve, or other observed data. Please revise the trip generation analysis accordingly for both ADM and Graham Project.

- 4) In Table 6, an auto occupancy factor of 2.3 is reported, but it is not clear how this factor was derived. The MOA Survey data cited in Appendix G indicates that the size of a typical party surveyed at MOA breaks down as 44% 1 person, 35% 2 person, 21% 3+ people. Assuming the average party size in the 3+ category is 3.5, then the average party size would be 1.9. It is unclear if a cross-classification of mode of travel and size of party was analyzed to specify the size of party for users of personal automobiles. Please clarify the methodology used to calculate the report auto occupancy value of 2.3, and include calculations supporting the text in the report.
- 5) The assumption that trip rates derived for GLA (Retail) from MOA can be directly applied to retail GLA of ADM is questionable. The implicit assumption is that the non-retail portions of the MOA and ADM will have similar trip generation characteristics. Currently, the only support provided is that the retail square footage as a proportion of the gross floor area is similar, but a comparison of the non-retail square footage of the two developments is not discussed in the application.

From previous information provided by ADM, the non-retail portion of MOA consists of 31% common areas, compared to 19% common areas in the ADM development. While the proportion of retail GLA in the two developments is comparable, at 56% for ADM and 59% for MOA, the proportion of non-retail attractions in the two developments is not, with 24% in ADM and 11% in MOA.

Therefore, the use of traffic counts on a per-retail square footage basis is a flawed approach that does not consider a large portion of the trip generation activity in ADM, relative to MOA. In addition, there is no control for the regional context of ADM relative to MOA. South Florida includes a number of attractions that are likely to reduce the internal capture of trips at ADM. In conclusion, the trip generation rates from MOA must at least be factored to account for these two significant differences in the two developments.

- 6) Pursuant to the ITE Trip Generation Handbook, 2<sup>nd</sup> Edition, *“Diverted linked trips are trips that are attracted from the traffic volume on roadways within the vicinity of the generator but require a diversion from that roadway to another roadway to gain access to the site.”* Since trips to ADM and Graham Project travel to both generators via limited access facilities adjacent to the sites, they add traffic to streets that directly connect to the site. As a result, these trips are classified as Diverted Linked Trips and not Pass-By Trips. Please revise the trip generation analysis accordingly for both ADM and Graham Project.

In addition, such diverted linked trips must be accounted for when evaluating the project’s impact on the adjacent streets that directly connect to both sites. Please revise the roadway link analysis to include these diverted linked trips.

## **Section 7.0 – Project Trip Distribution and Assignment**

- 7) Using Mall of America (MOA) data, ADM and Graham Project assumed that approximately 30% of all trips are non-regional. It is stated in the CDMP traffic analysis that modelling efforts were made to distribute this

magnitude of volume to HEFT and I-75. To verify the travel characteristics associated with MOA in Minneapolis are comparable to ADM in Miami, it is recommended that additional documentation be provided to substantiate the non-regional trip assumption. This should include a tabular summary comparing several trip generators that attract non-regional trips to document and verify the proposed 30% assignment. Potential large scale retail uses to review that attract non-regional traffic include Sawgrass Mills Mall which also happens to be located within the area covered by SERPM.

- 8) The impact of the solution on study area links definition must also be assessed and described in the report. If ADM trip length frequency distribution is underestimated, it is possible that impacts to roadways and number of impacted roadway segments are also underestimated.

## **Section 9.0 – Mitigation Analysis**

- 9) Please clarify the commitment of funding for the improvements included in the mitigation analysis, and the entity responsible for constructing that improvement.
- 10) The applicant previously agreed, as part of the methodology development review, to include transit and multimodal mitigation measures. Please include in the report consideration for multimodal or transit mitigation measures.

Please contact Lisa Dykstra at (954) 777-4360 or you can contact me at (305) 470-5386 if you need any additional assistance.

Thank you,

Lisa

Lisa Colmenares, AICP  
Planning Manager  
Intermodal Systems Development Office  
Florida Department of Transportation, District Six  
1000 NW 111<sup>th</sup> Avenue  
Miami, FL 33172  
Phone: (305) 470-5386  
E-mail: lisa.colmenares@dot.state.fl.us

---

**From:** Stillings, Noel (RER) [<mailto:stillin@miamidade.gov>]

**Sent:** Wednesday, December 30, 2015 11:18 AM

**To:** Somoza, Napoleon (RER); Shen, Joan (PWWM); Khan, Muhammad (PWWM); Patino, Myra (PWWM); Cejas, Monica (MDT); Cartaya, Nilia M. (MDT); Brown, Helen (RER)

**Cc:** Boucle, Aileen; 'Paul.Camples@dot.state.fl.us'; Desdunes, Harold; Dykstra, Lisa; Colmenares, Lisa; 'mgonzalez@cityofhialeahgardens.com'; Gutierrez-Scaccetti, Diane; 'bhenry@broward.org'; 'Margaret.higgis@dot.state.fl.us'; 'schaadb@miamilakes-fl.gov'; 'jsodia@broward.org'; 'dstorch@hialeahfl.gov'; 'sezuniga@miramarfl.gov'; Wong, Chon; 'mdiaz@mdxway.com'; 'Eman.gamaa@dot.state.g.us'; Lewis, Lynn; Martinelli, Tomas; 'jmmoore@miramarfl.gov'; 'minavialobo@mdxway.com'; 'reya@miamilakes-fl.gov'; 'ebsilva@miramarfl.gov'; 'jtoledo@mdxway.com'; 'sbrunner@broward.org'; 'jehernandez@hialeahfl.gov'; 'kimcsamson@dot.state.fl.us'; 'rsalomon@sunrisefl.gov'; Woerner, Mark (RER)

**Subject:** RE: American Dream Miami and Graham Properties Applications - Traffic Report Available

Good morning,

The applicant's traffic report for both the American Dream Miami and the Graham Applications is available for your review and can be accessed online at: <http://www.miamidade.gov/planning/cdmp-amendment-cycles.asp> (scroll down to the "November 2015" heading for the PDF labeled "Transportation Impact Analysis for Application Nos. 1 and 2").

A meeting to review the analysis will soon be scheduled.

Regards,

Noel Stillings, Senior Planner  
**Planning Division, Metropolitan Planning Section**  
**Miami-Dade County Department of Regulatory and Economic Resources**

111 NW 1st Street, 12th floor, Miami, Florida 33128

**Phone: (305) 375-2835** ext. 96535

---

**From:** Somoza, Napoleon (RER)

**Sent:** Tuesday, December 08, 2015 1:00 PM

**To:** Shen, Joan (PWWM) <[joans@miamidade.gov](mailto:joans@miamidade.gov)>; Khan, Muhammad (PWWM) <[khanm@miamidade.gov](mailto:khanm@miamidade.gov)>; Patino, Myra (PWWM) <[patinom@miamidade.gov](mailto:patinom@miamidade.gov)>; Cejas, Monica (MDT) <[mcejas@miamidade.gov](mailto:mcejas@miamidade.gov)>; Cartaya, Nilia M. (MDT) <[cartayn@miamidade.gov](mailto:cartayn@miamidade.gov)>; Brown, Helen (RER) <[HFB@miamidade.gov](mailto:HFB@miamidade.gov)>; Stillings, Noel (RER) <[stillin@miamidade.gov](mailto:stillin@miamidade.gov)>

**Cc:** [Aileen.Boucle@dot.state.fl.us](mailto:Aileen.Boucle@dot.state.fl.us); 'Paul.Camples@dot.state.fl.us' <[Paul.Camples@dot.state.fl.us](mailto:Paul.Camples@dot.state.fl.us)>; 'Harold.desdunes@dot.state.fl.us' <[Harold.desdunes@dot.state.fl.us](mailto:Harold.desdunes@dot.state.fl.us)>; 'Lisa.dykstra@dot.state.fl.us' <[Lisa.dykstra@dot.state.fl.us](mailto:Lisa.dykstra@dot.state.fl.us)>; 'Lisa.Colmenares@dot.state.fl.us' <[Lisa.Colmenares@dot.state.fl.us](mailto:Lisa.Colmenares@dot.state.fl.us)>; 'mgonzalez@cityofhialeahgardens.com' <[mgonzalez@cityofhialeahgardens.com](mailto:mgonzalez@cityofhialeahgardens.com)>; 'Diane.scaccetti@dot.state.fl.us' <[Diane.scaccetti@dot.state.fl.us](mailto:Diane.scaccetti@dot.state.fl.us)>; 'bhenry@broward.org' <[bhenry@broward.org](mailto:bhenry@broward.org)>; 'Margaret.higgis@dot.state.fl.us' <[Margaret.higgis@dot.state.fl.us](mailto:Margaret.higgis@dot.state.fl.us)>; 'schaadb@miamilakes-fl.gov' <[schaadb@miamilakes-fl.gov](mailto:schaadb@miamilakes-fl.gov)>; 'jsesodia@broward.org' <[jsesodia@broward.org](mailto:jsesodia@broward.org)>; 'dstorch@hialeahfl.gov' <[dstorch@hialeahfl.gov](mailto:dstorch@hialeahfl.gov)>; 'sezuniga@miramarfl.gov' <[sezuniga@miramarfl.gov](mailto:sezuniga@miramarfl.gov)>; 'chon.wong@dot.state.fl.us' <[chon.wong@dot.state.fl.us](mailto:chon.wong@dot.state.fl.us)>; 'mdiaz@mdxway.com' <[mdiaz@mdxway.com](mailto:mdiaz@mdxway.com)>; 'Eman.gamaa@dot.state.g.us' <[Eman.gamaa@dot.state.g.us](mailto:Eman.gamaa@dot.state.g.us)>; 'Lynn.lewis@dot.state.fl.us' <[Lynn.lewis@dot.state.fl.us](mailto:Lynn.lewis@dot.state.fl.us)>; 'Tomas.martinelli@dot.state.fl.us' <[Tomas.martinelli@dot.state.fl.us](mailto:Tomas.martinelli@dot.state.fl.us)>; 'jmmoore@miramarfl.gov' <[jmmoore@miramarfl.gov](mailto:jmmoore@miramarfl.gov)>; 'minavialobo@mdxway.com' <[minavialobo@mdxway.com](mailto:minavialobo@mdxway.com)>; 'reya@miamilakes-fl.gov' <[reya@miamilakes-fl.gov](mailto:reya@miamilakes-fl.gov)>; 'ebsilva@miramarfl.gov' <[ebsilva@miramarfl.gov](mailto:ebsilva@miramarfl.gov)>; 'jtoledo@mdxway.com' <[jtoledo@mdxway.com](mailto:jtoledo@mdxway.com)>; 'sbrunner@broward.org' <[sbrunner@broward.org](mailto:sbrunner@broward.org)>; 'jehernandez@hialeahfl.gov' <[jehernandez@hialeahfl.gov](mailto:jehernandez@hialeahfl.gov)>; 'kimcsamson@dot.state.fl.us' <[kimcsamson@dot.state.fl.us](mailto:kimcsamson@dot.state.fl.us)>; 'rsalomon@sunrisefl.gov' <[rsalomon@sunrisefl.gov](mailto:rsalomon@sunrisefl.gov)>; Woerner, Mark (RER) <[MWOERNER@miamidade.gov](mailto:MWOERNER@miamidade.gov)>

**Subject:** FW: American Dream Miami

**Importance:** High

Ladies and gentlemen,

Please find attached for your information and review a supplement to the CDMP TIA Methodology for the American Dream Miami Application which include the Graham project –another CDMP Amendment Application filed last month and located south of the American Dream Miami CDMP Amendment Application– in the TIA analysis. Should you have any questions or comments regarding the supplement to the TIA Methodology, please feel free to reach out directly to the ADM Transportation consultant but do not forget to copy Mr. Mark R. Woerner, Miami-Dade County Assistant Director for Planning.

Thank you very much for your assistance with this planning process.

**Napoleon V. Somoza**, Supervisor  
Metropolitan Planning Section – Long Range Planning  
**Miami-Dade County Department of Regulatory and Economic Resources**  
111 NW 1<sup>st</sup> Street, Suite 1220  
Miami, FL 33128-1972  
Tel. No. 305-375-2835 ext. 8754  
[nvs@miamidade.gov](mailto:nvs@miamidade.gov)

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---

**From:** Woerner, Mark (RER)  
**Sent:** Friday, December 04, 2015 3:08 PM  
**To:** Rowe, Garrett A. (RER) <[rowega@miamidade.gov](mailto:rowega@miamidade.gov)>; Somoza, Napoleon (RER) <[NVS@miamidade.gov](mailto:NVS@miamidade.gov)>  
**Subject:** FW: American Dream Miami

See attached.

**Mark R. Woerner, AICP**  
Assistant Director for Planning  
Planning Division  
Miami-Dade County Department of Regulatory and Economic Resources  
305-375-2835  
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---

**From:** James Taylor [<mailto:jmt@lce-fl.com>]  
**Sent:** Friday, December 04, 2015 3:04 PM  
**To:** Woerner, Mark (RER) <[MWOERNER@miamidade.gov](mailto:MWOERNER@miamidade.gov)>  
**Cc:** 'Robert Gorlow' <[rgorlow@comcast.net](mailto:rgorlow@comcast.net)>; 'Andre Groenhoff' <[andre.groenhoff@gmail.com](mailto:andre.groenhoff@gmail.com)>; 'Miguel Diaz de la Portilla' <[Mdportilla@arnstein.com](mailto:Mdportilla@arnstein.com)>; Osterholt, Jack (Office of the Mayor) <[josterholt@miamidade.gov](mailto:josterholt@miamidade.gov)>; 'Scot Leftwich, Ph.D., P.E.' <[scot.leftwich@lce-fl.com](mailto:scot.leftwich@lce-fl.com)>  
**Subject:** RE: American Dream Miami

Mark,

On behalf of American Dream Miami, please find for County record a supplement to the ADM CDMP TIA Methodology Statement to include the Graham project in the analysis per your discussion with the developers last month. Please feel free to reach out directly with any questions.

Regards,  
James

-----  
James M. Taylor, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Tel: (407) 281-8100, ext. 205  
Fax: (407) 249-2212  
Email: [jmt@lce-fl.com](mailto:jmt@lce-fl.com)  
-----

---

**From:** Shen, Joan (PWWM) [<mailto:joans@miamidade.gov>]  
**Sent:** Wednesday, November 18, 2015 11:36 AM  
**To:** 'Scot Leftwich, Ph.D., P.E.' <[scot.leftwich@lce-fl.com](mailto:scot.leftwich@lce-fl.com)>  
**Cc:** 'Robert Gorlow' <[rgorlow@comcast.net](mailto:rgorlow@comcast.net)>; 'Andre Groenhoff' <[andre.groenhoff@gmail.com](mailto:andre.groenhoff@gmail.com)>; 'James Taylor'



<[jmt@lce-fl.com](mailto:jmt@lce-fl.com)>; 'Miguel Diaz de la Portilla' <[Mdportilla@arnstein.com](mailto:Mdportilla@arnstein.com)>; Osterholt, Jack (Office of the Mayor) <[josterholt@miamidade.gov](mailto:josterholt@miamidade.gov)>; Woerner, Mark (RER) <[MWOERNER@miamidade.gov](mailto:MWOERNER@miamidade.gov)>; Khan, Muhammad (PWWM) <[khanm@miamidade.gov](mailto:khanm@miamidade.gov)>; Patino, Myra (PWWM) <[patinom@miamidade.gov](mailto:patinom@miamidade.gov)>; Eymil, Yelenys (PWWM) <[Yele@miamidade.gov](mailto:Yele@miamidade.gov)>

**Subject:** RE: American Dream Miami

We are available after 4 PM tomorrow.

Thank you,

**Joan Shen**, Ph.D., P.E., PTOE, Chief  
Traffic Engineering Division  
Miami-Dade County Department of Transportation and Public Works  
111 NW 1st Street, Suite 1510, Miami, FL 33128  
Phone: 305-375-2030, Fax: 305-372-6064  
<http://www.miamidade.gov/pubworks/>

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**From:** Scot Leftwich, Ph.D., P.E. [<mailto:scot.leftwich@lce-fl.com>]

**Sent:** Tuesday, November 17, 2015 5:54 PM

**To:** Shen, Joan (PWWM)

**Cc:** 'Robert Gorlow'; 'Andre Groenhoff'; 'James Taylor'; 'Miguel Diaz de la Portilla'; Osterholt, Jack (Office of the Mayor); Woerner, Mark (RER); Khan, Muhammad (PWWM); Patino, Myra (PWWM); Eymil, Yelenys (PWWM)

**Subject:** RE: American Dream Miami

Dr. Shen

Thank you for your comments. Do you have time on Thursday afternoon to discuss the comments. Please let me know and I will send a call in number.

Scot

D. Scot Leftwich, Ph.D., P.E.  
President  
Leftwich Consulting Engineers, Inc.  
12151 Science Drive Suite 101  
Orlando, Florida 32826

Telephone: (407) 281-8100 ext 203

Facsimile: (407) 249-2212

Mobile: (407) 406-4455

---

**From:** Shen, Joan (PWWM) [<mailto:joans@miamidade.gov>]

**Sent:** Tuesday, November 17, 2015 4:27 PM

**To:** 'Scot Leftwich, Ph.D., P.E.'

**Cc:** 'Robert Gorlow'; 'Andre Groenhoff'; 'James Taylor'; Miguel Diaz de la Portilla; Osterholt, Jack (Office of the Mayor); Woerner, Mark (RER); Khan, Muhammad (PWWM); Patino, Myra (PWWM); Eymil, Yelenys (PWWM)

**Subject:** RE: American Dream Miami

Good afternoon Dr. Leftwich,

Attached, please find our responses in blue.

Thank you,

**Joan Shen, Ph.D., P.E., PTOE, Chief**  
Traffic Engineering Division  
Miami-Dade County Department of Transportation and Public Works  
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**From:** Scot Leftwich, Ph.D., P.E. [<mailto:scot.leftwich@lce-fl.com>]  
**Sent:** Monday, October 26, 2015 6:16 PM  
**To:** Khan, Muhammad (PWWM); Osterholt, Jack (Office of the Mayor); Shen, Joan (PWWM)  
**Cc:** 'Robert Gorlow'; 'Andre Groenhoff'; 'James Taylor'; Miguel Diaz de la Portilla  
**Subject:** FW: American Dream Miami

Muhammad

Thank you for your comments. Attached are our responses to your comments.  
Scot

D. Scot Leftwich, Ph.D., P.E.  
President  
Leftwich Consulting Engineers, Inc.  
12151 Science Drive Suite 101  
Orlando, Florida 32826

Telephone: (407) 281-8100 ext 203  
Facsimile: (407) 249-2212  
Mobile: (407) 406-4455

---

**From:** Khan, Muhammad (PWWM) [<mailto:khanm@miamidade.gov>]  
**Sent:** Friday, October 23, 2015 2:50 PM  
**To:** Scot Leftwich, Ph.D., P.E. <[scot.leftwich@lce-fl.com](mailto:scot.leftwich@lce-fl.com)>; 'James Taylor' <[jmt@lce-fl.com](mailto:jmt@lce-fl.com)>  
**Cc:** Shen, Joan (PWWM) <[joans@miamidade.gov](mailto:joans@miamidade.gov)>; Patino, Myra (PWWM) <[patinom@miamidade.gov](mailto:patinom@miamidade.gov)>;  
[andre.groenhoff@gmail.com](mailto:andre.groenhoff@gmail.com); Eymil, Yelenys (PWWM) <[Yele@miamidade.gov](mailto:Yele@miamidade.gov)>; Brown, Helen (RER)  
<[HFB@miamidade.gov](mailto:HFB@miamidade.gov)>  
**Subject:** RE: American Dream Miami

Good afternoon Scot/James,

Nice talking to you this morning in the meeting. As discussed, we reviewed the material and offer some additional comments below:

- 1) As commented before, we have concerns regarding 14% pass by trips. Was there any pass-by trip data collected for MOA site to support it. It is recommended that this rate should be reduced.

- 2) The size of about 1.5 million-SF of entertainment uses in ADM appears significantly higher than MOA. Therefore, it is expected to create its own separate trip generation apart from retail. Please revise trip generation accordingly.
- 3) Vehicle occupancy rates are not mentioned. If they are available they can be used to support trip generation by applying to estimated persons/customers of ADM project.
- 4) Provisions should be kept in planning and design phases for right-of-ways and space to accommodate any future rail or transit service with dedicated travel way.
- 5) Based on review of slide 18, if the vehicles were tube counted for MOA, then no transit or non-motorized reductions should be made.
- 6) No discussion is provided regarding the parking demand.
- 7) We are working in coordination with our RER department for the stations' traffic data and will provide you soon.

Should you have any questions or need additional information, please contact us at the number below.

Regards,

Muhammad Asif Khan, P.E., PTP, PTOE, Professional Engineer  
Traffic Engineering Division  
**Miami Dade County**  
**Department of Transportation**  
**and Public Works**

111 NW 1st Street, Suite 1510, Miami, Florida, 33128-1970

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**From:** Scot Leftwich, Ph.D., P.E. [<mailto:scot.leftwich@lce-fl.com>]

**Sent:** Wednesday, October 21, 2015 4:20 PM

**To:** Shen, Joan (PWWM); 'James Taylor'

**Cc:** Khan, Muhammad (PWWM); Patino, Myra (PWWM); [andre.groenhoff@gmail.com](mailto:andre.groenhoff@gmail.com)

**Subject:** RE: American Dream Miami

Thank you

Scot

D. Scot Leftwich, Ph.D., P.E.

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---

**From:** Shen, Joan (PWWM) [<mailto:joans@miamidade.gov>]

**Sent:** Wednesday, October 21, 2015 2:44 PM

**To:** 'James Taylor'

**Cc:** 'Scot Leftwich, Ph.D., P.E.'; Khan, Muhammad (PWWM); Patino, Myra (PWWM)

**Subject:** RE: American Dream Miami

Hi James,

Below is the contact information for Muhammad Khan and Myra Patino:

Muhammad Asif Khan, P.E., PTP, PTOE,  
Traffic Engineering Division

**Miami Dade County**

**Department of Transportation and Public Works**

111 NW 1st Street, Suite 1510, Miami, Florida, 33128-1970

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-----  
Myra Patino, P.E.

Traffic Engineering Division

**Miami Dade County**

**Department of Transportation and Public Works**

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Phone: 305-375-1682 - Fax: 305-372-6064

Email: [patinom@miamidade.gov](mailto:patinom@miamidade.gov)

Thank you,

**Joan Shen, Ph.D., P.E., PTOE, Chief**

Traffic Engineering Division

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**From:** James Taylor [<mailto:jmt@lce-fl.com>]

**Sent:** Wednesday, October 21, 2015 10:30 AM

**To:** Shen, Joan (PWWM)

**Cc:** 'Scot Leftwich, Ph.D., P.E.'

**Subject:** American Dream Miami

Dr. Shen,

Dr. Leftwich and I would like to schedule some time this afternoon to follow up on the TIA methodology for the American Dream Miami, as well as begin coordination of directional count data for use in the TIA.

Could we get half an hour with you today at 1P?

Regards,  
James

-----  
James M. Taylor, P.E.  
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-----

## Stillings, Noel (RER)

---

**From:** Brandon R. Schaad <schaadb@miamilakes-fl.gov>  
**Sent:** Thursday, January 21, 2016 10:04 AM  
**To:** Woerner, Mark (RER); Stillings, Noel (RER); Somoza, Napoleon (RER)  
**Subject:** American Dream Miami and Graham Properties Applications

Greetings,

Below, please find the Town of Miami Lakes comments on the CDMP amendment application traffic study for the above-referenced project. I will be at the meeting tomorrow to discuss these comments in person.

1. Page 5: The study says that "... the study area for each development extends to all significant roadways where external trips for each project are forecast to be equivalent to or greater than five percent (5%) of the maximum service volume (MSV) ..." What does "significant roadways" mean? Is there a definitions, or can you identify those roadways that are not considered to be significant? We are concerned that the analysis seems to arbitrarily exclude all roads within the Town of Miami Lakes.
2. Page 5: The study area should be defined by a five percent threshold for of MSV for *both projects combined*. Distinguishing the two projects for traffic analysis purposes is essentially a fiction.
3. Page 13: The use of the Mall of America (MOA) as a model for trip generation, with further any further adjustments, needs more analysis and justification. While we agree that the MOA is in general a reasonably close comparable case for a unique project, the MOA is geographically situated very differently within its metropolitan area than this potential mall would be. Given such limited sample sizes, it is essential to at least try to account for how such a difference might affect trip generation. For example, on page 14 it is explained that the MOA's internal capture rate was applied to this project. But would geographic location affect internal capture rate? If so, how?
4. Page 14: Regarding the reduction for diverted trips, and the use of the standard percentage of diverted trips for Shopping Center being used, it seems at least plausible that the percent of diverted trips for the proposed mall would be significantly lower, given its size and (it seems likely) significant time commitment getting into and out of the facility (i.e. it is less likely to "stop-in" for a meal if it will take significant time to get into and out of the mall). Additionally, this "Shopping Center" diverted trip factor seems to have been applied to all generated trips, even those that are very different from retail (i.e. hotels, amusement parks, etc.), some of which common sense would suggest would have close to zero diverted trips. Is there a justification for applying the "Shopping Center" rate to all trips?
5. Page 29 (and elsewhere): Regarding Miami Gardens Drive between I-75 and NW 87<sup>th</sup> Avenue in the short term (2020), in several places the traffic study discusses an existing deficiency that **WOULD BE** existing if the adopted LOS was something other than what it is. However, the LOS on this roadway is adopted partially for policy reasons related to transit and other alternative modes, and not simply as an exception. The analysis should focus on the LOS for this roadway as actually adopted.
6. Pages 29 and 30: Regarding the long term (2040) LOS of the HEFT from NW 106<sup>th</sup> Street to US 27 and I-75 from Miramar Parkway to Miami Gardens Drive, the study states that "Regression of historical count data shows Year 2040 background volumes could be higher than the available capacity even with the capacity improvement before any project trips are added." This appears to mean that the model does not show such a failure with the proposed capacity improvement, which would mean that if the project's trip cause the LOS failure, then the applicant would have responsibility for mitigation.
7. Page 35: the study states that "All improvements were assumed to be place [sic] by the Short-term Year 2020." Does County staff believe this is feasible?

8. General: the only mitigation proposed in this analysis is for Miami Gardens Drive, in the short term year (2020), which is to minimize left turns and provide an uninterrupted flow section as part of the I-75 interchange improvement. However, if that is the mitigation proposed, there should be an analysis as to what the impact of that mitigation would be.

9. General: It is unfortunate that the CDMP amendment rules do not require analysis of modes of transportation other than automobile. While looking only at traffic numbers, it is straightforward to simply conclude that adding more lanes here or there or creating an “uninterrupted flow section” would result in achieving an adopted LOS, but ignoring the potential impact that such action might have on transit mobility which, after all, requires walkability that is often degraded through automobile “capacity enhancements.” Given the significance of this project, not only on its own terms but through its potential as a catalyst impacting a large area around it, this opportunity should be seized upon to evaluate impacts and potential improvements (and including alternative improvements, such as a rail transit connection) to all modes of transportation simultaneously and holistically, such that this significant project could be a starting point to achieving a more multimodal transportation system in the larger vicinity of the project. This opportunity should not be wasted, even if it requires more time than simply applying once again a system that has proven many times over that it does not work.

**Brandon R. Schaad, AICP, LEED AP**  
**Director of Planning**



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[www.miamilakes-fl.gov](http://www.miamilakes-fl.gov)



PRELIMINARY COMMENTS ON THE  
AMERICAN DREAM MIAMI (ADM) AND THE GRAHAM COMPANIES  
TRAFFIC IMPACT ANALYSIS (TIA) REPORT  
MIAMI-DADE COUNTY DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES  
AND  
DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS  
January 22, 2016

**Page 1, Section 1.0 Introduction**

Figure 1 Map, Project Location and Existing Roadways

- Map must show all roadway improvements proposed for each of these two projects, such as NW 102 Avenue as indicated on Figure 2 Map.
- Some existing interchange locations are incorrect. For example, the interchanges at the HEFT and NW 67 Avenue and at I-75 and NW 87 Avenue do not exist. The interchange at I-75 and NW 87 is a planned future improvement. Please revise map accordingly.

Figure 2 Map, Preliminary Access Plan

- Show all the planned roadway improvements proposed within the application site for the Graham project, such as NW 102 Avenue.

**Page 5, Section 2.0 Analysis Years**

- Provide Concurrency Analyses for each application including identifying the traffic count station for each roadway segment analyzed, and for the combined applications as requested in the *Instructions For Applications Requesting Amendments to the Miami-Dade County Comprehensive Development Master Plan May 2015-16 Amendment Cycle*.

**Page 5, Section 3.0 Study Area**

Figure 3, ADM and Graham 2020 Study Area and Figure 4, ADM and Graham 2040 Study Area Maps

- Clarify the information regarding the ADM Study Area Roadway and Graham Study Area Roadway.

**Page 8, Section 4.0 Existing Conditions (Year 2015)**

Figure 5, FDOT and County Stations

- Provide analyses in Table 1 and Appendix C for all FDOT and County traffic count stations shown on Figure 5.

Table 1, Existing (Year 2015) Study Area Roadway Segments LOS Analysis.

- Identify the traffic count station for each roadway segment analyzed.
- Maximum service volumes for State roadways should be determined using FDOT's Generalized Table and the County's adopted LOS standards. Maximum service volumes for County roadways must be calculated using ARTPLAN and the County's adopted LOS standards.
- Peak Hour Period volumes (PHP) are calculated using the average of the two highest consecutive hours, when 24-hour traffic counts are available. If 24-hour traffic counts are not available, then use the K factor. See *Instructions For Applications Requesting*



*Amendments to the Miami-Dade County Comprehensive Development Master Plan May 2015-16 Amendment Cycle).*

- For the Existing analysis, use the actual hourly traffic counts available from FDOT and the County. For the 2020 and 2040 analyses, the growth factors must be applied to the hourly volumes.

#### **Page 11, Section 5.0 Trip Generation**

- Use of the ITE Land Use code 820 for the pass-by trips does not seem to be appropriate because of the unique nature of this proposed development.
- Do the pass-by trips only apply to the retail-oriented land uses?
- 10% of the adjacent street traffic is a rule of thumb for pass-by values, according to the FDOT Transportation Site Impact Handbook.
- Provide a separate table showing the combined trip generation and combined analyses for both the ADM and Companies Applications for years 2020 and 2040.

Table 6, Trip Generation Summary for ADM

- Explain how the vehicle occupancy was applied for the light rail adjustment.
- Trip generation depends on the survey conducted – we want to look at alternatives.

#### **Page 17, Section 6.0 Background conditions (Years 2020 & 2040)**

- The County Platting Division has indicated that there is substantial development along NW 97 Avenue in the City of Hialeah. Provide information regarding these developments and consider their traffic impact in the analyses.

Figures 6, 7, and 8, Cost-Feasible and Planned Improvements

- Show only the Cost Feasible Roadway improvements (funded Priorities I through IV roadway improvements) listed in the adopted 2040 LRTP.

#### **Page 25, Section 7.0 Project Trip Distribution and Assignment**

- Provide the plots showing the new TAZs with the centroids and connectors.

Figure 9, 2020 Daily Project Distribution, and Figure 10, 2040 Daily Project Distribution

- Expand the study areas for each application and for the combined applications. It is unclear how trips are distributed. Review of Figures 9 and 10 indicate that only individual application trip attenuations were performed based on the 5% Rule methodology. Provide a trip distribution for the combined trips generated by both applications. Furthermore, the percentages along the expressways stopped at higher numbers, such as 11.6% (11.3%) along the HEFT going south and 15.4% (17.9%) along I-75 going east. Trips should be extended farther, in all directions and distributed to surface streets until the percentages reach 5% or less. Provide a new Study Area map for the combined ADM and Graham Companies traffic impacts equivalent to or greater than 5% of the maximum service volumes on the 2020 and 2040 roadway networks.
- Provide the supporting information in the Appendix H for all these maps.

#### **Page 29, Section 8.0 Build-Out Conditions (Years 2020 & 2040)**

Tables 9, Short-Term (Year 2020) Study Area Roadway Segment LOS Analysis and Figure 10, Long –Term (Year 2040) Roadway Segment LOS Analysis.

- Clarify if two-way analyses are also included, particularly for the 2020 and 2040 scenarios.

#### **Page 35, Section 9.0 Mitigation Analysis**

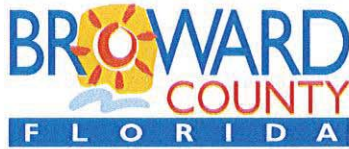
- As indicated in the *Instructions Report*, the analysis must consider only on the Cost-Feasible Plan of the 2040 LRTP (funded Priority I through IV) roadway improvements and should not consider partially funded, unfunded, or private projects. The applicants must be responsible for any additional roadway or transit improvements needed as a result of the impacts of their applications.

#### **Appendixes**

- Review of Appendix B indicated higher growth for expressways. For example, for I-75 and the HEFT the historical volumes for most of the segments will result in higher growth rates. Please verify and revise accordingly.
- Provide detailed modular plots for the entire impact study area in Appendix H1. Also, provide plots for the combined analysis in order to identify the impact of the combined applications.

#### **Additional Comments**

- Provide the County with any information or traffic analyses provided to other agencies as input and for review, such as the interchange justification and interchange modification reports.
- Identify roadways where schools exists or are planned and performed the corresponding AM Peak Hour analyses.
- Provide information regarding any plans for future transit service to serve the subject application sites.
- Add a new column to Tables 1, 9 and 10 identifying the traffic count station of each roadway segment analyzed. Also, include every major section roadways, arterials and collectors in the analyses.
- Add a Table of contents and a one- or two- page Executive Summary to the report.
- The County calculate the Impact Fees based on ITE trip generation codes. Provide information on the impact fees for the ADM Application.



Environmental Protection and Growth Management Department  
**PLANNING AND DEVELOPMENT MANAGEMENT DIVISION**

115 S. Andrews Avenue, Room 329K • Fort Lauderdale, Florida 33301 • 954-357-6634 • FAX 954-357-8655

January 25, 2016

Mark R. Woerner, AICP  
Assistant Director for Planning  
Dept. of Regulatory and Economic Resources  
111 NW 1st Street, 12th Floor  
Miami, FL 33128-1902

**RE: American Dream Miami and Graham Property**

Dear Mr. Woerner:

Thank you for the opportunity to provide comments on the proposed development of American Dream Miami (ADM) and the Graham Property, in northwest Miami-Dade County. Broward County staff has reviewed the Traffic Impact Analysis submitted with the two applications for amendment to the Miami-Dade Comprehensive Development Master Plan (CDMP).

Based on our review, staff makes the following recommendations which we request that the applicant specifically address in their resubmittal to Miami-Dade County:

1. The study area maps (Figure 3 for Year 2020 and Figure 4 for Year 2040) show the impacts associated with the ADM and Graham individually. The study areas should be calculated based on both ADM and Graham collectively.
2. Additionally, the traffic impacts of major developments in northwestern Dade County on southern Broward County should be modeled and evaluated. In addition to the ADM and Graham projects, the projected development of the Landmark property (between NW 47 and NW 57 Avenues and between NW 199 Street and Snake Creek Canal) should be included in the analysis.
3. Trip generation for ADM is based on an adjustment to the GLA-based rate for Mall of Americas (MOA). ADM will be about 35% larger than MOA and trip generation is increased a like amount to estimate trip generation for ADM (49,800 vs. 67,251). However, the theme park and related features are included within the gross floor area (GFA) but not within the gross leasing area (GLA). For this application, the non-leasable area of ADM could reasonably be expected to generate trips. The GFA for ADM will be 41% larger than MOA (vs. 35% for the GLA); given the unique nature of these developments, the trip adjustment should be based on GFA.

Broward County Board of County Commissioners

Mark Bogen • Beam Furr • Dale V.C. Holness • Martin David Kiar • Chip LaMarca • Stacy Ritter • Tim Ryan • Barbara Sharief • Lois Wexler  
[www.broward.org](http://www.broward.org)



4. The light rail transit (LRT) adjustment is stated to be 10.8 percent, but the adjusted increase in trip generation is only about 7 percent. The justification for this appears to be that MOA has an average vehicle occupancy (AVO) of 2.3 but the study assumes that ADM will have an AVO of 4.0 based on AVO's calculated for Orlando area theme parks. However, ADM will be a retail/entertainment complex congruous in nature to MOA, so much so that trip generation is based on MOA. Orlando theme parks are primarily entertainment complexes vs. retail/entertainment complexes. Therefore, it is reasonable to expect the AVO for ADM to be similar to that of MOA and the effective LRT adjustment should reflect the 10.8 percent value.
5. Information is limited in the report for the hotel component of MOA. Per our research, it appears MOA has a maximum of 850 on-site hotel rooms whereas 2,000 rooms are planned for ADM. This ratio of hotel rooms for ADM to MOA is not consistent with the 35% adjustment in trip generation and further puts into question the values used in the study to estimate ADM traffic.
6. The MOA trip data provided by Cambridge Systematics (included as an appendix to the TIA) indicates that a significant amount of the trips to and from MOA that have origins within an approximate 15-mile radius, however, there are also significant numbers of trips being made from approximately 60 miles or more. Approximately half of the trips have travel times in excess of 30 minutes, with 23% of trips having travel times greater than one hour. Given the fact that the ADA site has land uses that could attract trips from even further distances than the MOA site, the dissipation of ADM and Graham Property trips shown on the submitted TIA trip distribution maps seems to be more rapid than what would be expected based on the MOA site data. In other words, the TIA trip length distributions seem shorter than expected, reducing the size of the impact area. Please provide the SERPM model trip distribution plots for the ADM and Graham project zones for a 10-mile radius for the 2020 and 2040 model runs so that trip lengths can be further evaluated. If trip-length distribution curves are available for the project zones from the model outputs, please provide those as well. The longer project trip lengths also puts into question the diverted trip credit assumed for the TIA as it appears a substantial portion of ADM trips will be destination-oriented rather than diverted link or pass-by.
7. Please provide the SERPM model loaded total volumes and v/C ratio plots for the surrounding network for an approximate 10-mile radius surrounding the project zones (it is acknowledged that the model v/C's are not equivalent to the segment v/C's using FDOT planning level-of-service procedures).
8. Please provide a summary table of the model land use data files (ZDATA files) for the study area traffic analysis zones for the various 2020 and 2040 model runs.
9. Based on the TIA narrative, the Applicant indicates that there will be additional traffic analysis provided beyond that currently included in the CDMP traffic impact analysis. Broward County staff has concerns about the frictional impacts that the expanded I-75 interchange will have on an already congested I-75 mainline as well as what impacts the proposed access ramps onto the HEFT will have on the adjacent HEFT mainline



operations. Please describe what additional traffic operations analysis will be provided to address these areas.

10. Continuing from the above comment, an operational analysis of the I-75 @ Miramar Parkway interchange and adjacent should be performed as more than 5% of the current project distribution impacts this interchange. Broward County staff has concerns regarding impacts to the interchange operations as well as the arterial mainline of Miramar Parkway. Additionally, existing Broward MPO data show Miramar Parkway east and west of I-75 significantly overcapacity (peak-hour v/C's of 1.47 and 1.21) whereas the TIA analysis for existing conditions shows those links operating at LOS "C."
11. Please provide the project distributions along the segment of Flamingo Road/Ludlam Road from Red Road in Broward County to NW 188 Street in Miami-Dade County. This corridor is one of the few continuous north/south corridors that crosses county lines other than the expressways in the area. It is currently a two lane facility and could potentially become a parallel reliever to other roadways forecasted to be over-capacity.
12. The TIA narrative essentially indicates that the ADM and Graham projects generally have no significant impacts or capacity mitigation requirements beyond the project access needs due to the fact that the significantly impacted roadway segments that are forecasted to operate below the adopted LOS standard were already forecasted to operate below the standard without the projects. However, some of the project's impacts represent a significant percentage of the adopted level-of-service capacity of the failing links, creating a much more severely failing condition on these segments. It seems that a land plan application that further degrades a failing links should be required to mitigate at least its additional impact to the failing link, or propose other mitigation, potentially on parallel facilities to offset these impacts. Please clarify the projects' mitigation responsibilities relative to these impacts as part of the CDMP process.
13. For the American Dream project, ITE land use code 820 was not considered an acceptable source of data. Please explain why it is acceptable for calculating trip diversion. The number of diverted trips appears to be overestimated, especially given the fact that the study states that "30% of MOA visits were made from outside the region" and that "nearly half of MOA trips travel over 30 minutes to arrive at the site." A smaller number of diverted trips and longer trip lengths would have a more negative effect on Broward County facilities.
14. During the review meeting held at SFRPC on January 22, 2016, there was discussion of extending transit to this site and construction of park and ride facilities. Whilst Miami-Dade Transit will be the primary service provider, staff would encourage the applicant to explore option for transit service north of the site with Broward County Transit. Transit riders are likely to be employees working in retail, hotel and park components of the project. South Broward County has many residential neighborhoods which would be included in the future labor pool.

I look forward to continuing to work with you and your staff as this development project moves through the development review process. In the event that mitigation is proposed in Broward County, I would like to coordinate with your staff and our attorneys to develop appropriate, enforceable, agreements that will ensure the installation of required improvements outside Miami-Dade County.

Please let me know if you have questions about these comments. I can be reached at (954) 357-6602 or [jsesodia@broward.org](mailto:jsesodia@broward.org).

Sincerely,



Josie P. Sesodia, AICP  
Director

CC: Bertha Henry, County Administrator  
Cynthia S. Chambers, Director EPGMD  
Henry Snizek, Deputy Director, EPGMD  
Tony Hui, Deputy Director, Public Works Dept.  
Scott Brunner, P.E., Director, Traffic Engineering Division



*Florida Department of Transportation*

RICK SCOTT  
GOVERNOR

1000 NW 111 Avenue  
Miami, FL 33172

JIM BOXOLD  
SECRETARY

January 28, 2016

The Honorable Jack Osterholt  
Deputy Mayor of Miami-Dade County  
Office of the Mayor  
111 NW 1st Street, 29<sup>th</sup> Floor  
Miami, FL 33128

**Subject: American Dream Miami & The Graham Project  
Transportation Impact Analysis for Comprehensive Development  
Master Plan (CDMP) Amendment – December 22, 2015**

Dear Deputy Mayor Osterholt:

The Florida Department of Transportation, District Six, in cooperation with District Four, completed a joint review of the submitted transportation impact analysis for the American Dream Miami (ADM) and The Graham Project developments, which is dated December 22, 2015. The document represents a joint CDMP traffic analysis effort between ADM Mall and the 340 acre Graham Companies property located immediately south of ADM.

The mixed-use ADM project and the Graham Project are located in the southwest corner of the interchange at I-75 and Miami Gardens Drive in northwest Miami-Dade County. The sites also are adjacent to the interchange between the Homestead Extension of Florida's Turnpike (HEFT) and I-75. The ADM project, situated on about 194 acres, totals 6.2 million square feet of non-residential use and a 2,000 room hotel. Of this, 3.5 million square feet will be dedicated for retail use, while the remaining 2.7 million square feet is for entertainment uses. These entertainment uses include an indoor theme park, an indoor water park, a sports complex, movie and live action theaters and a ski slope. The proposed build-out for the ADM project is 2020, while the proposed build-out for the Graham Companies project is 2040.



The Graham Companies project, which occupies about 340 acres, is planned to be completed in phases. By 2020 (which coincides with the build-out date for ADM), The Graham Project site will consist of 150,000 square feet of retail use, 250,000 square feet of business park use, and 500 multi-family dwelling units. At the time of its build-out in 2040, the Graham Companies project will include 1.0 million square feet of retail use, 3.0 million square feet of business park use, and 2,000 multi-family dwelling units.

Based on the joint CDMP traffic analysis submitted, the following comments are offered.

### **General Comments**

- 1) Pursuant to House Bill (HB) 359 and Florida Statute (F.S.) 373.4149 (Miami-Dade County Lake Belt Area), *"Rezoning, or amendments to local zoning and subdivision regulations, and amendments to local comprehensive plans concerning properties that are located within 1 mile of the Miami-Dade Lake Belt Area shall be compatible with limestone mining activities. No rezonings, variances, amendments to local zoning and subdivision regulations which would result in an increase in residential density, or amendments to local comprehensive plans for any residential purpose may be approved for any property located in sections 35 and 36 and the east one-half of sections 24 and 25, Township 53 South, Range 39 East until such time as there is no active mining within 2 miles of the property."*

Given that the proposed comprehensive plan amendments are located within one mile of the Lake Belt Area and an increase in residential development intensity is planned on The Graham Project site, please provide sufficient documentation that demonstrates this comprehensive plan amendment complies with HB 359 and F.S. 373.4149.

- 2) ADM and the Graham Project propose improvements that affect existing interchanges, a future full interchange, and a future partial interchange (Miami Gardens Drive at I-75, HEFT at I-75, a new interchange at HEFT and NW 170th Street, and a partial interchange at NW 178th Street and I-75). An Interchange Access Request (IAR) document, consistent with the FDOT Interchange Access Request – User's Guide, will be required for each of the interchange modifications. Additional traffic analyses will be required to evaluate impacts upon Strategic Intermodal System (SIS) facilities and



interchanges during morning, afternoon and weekend periods, and to identify improvements to accommodate the additional future traffic.

- 3) Several transportation improvement projects are relied upon to demonstrate adequate public facilities will be present by 2020 to accommodate the expected travel demand generated by ADM and The Graham Project. These include an interchange modification at HEFT and I-75, a new interchange at HEFT and NW 170<sup>th</sup> Street, a new partial interchange at I-75 and NW 178<sup>th</sup> Street, and an interchange modification at I-75 and Miami Gardens Drive. Each of these interchange improvements ultimately requires approval by FDOT and the Federal Highway Administration (FHWA).

If any of the interchange improvements fail to be approved and/or constructed by 2020, the base transportation network that is the foundation of ADM and The Graham Project's traffic analysis is invalid. This would result in additional transportation impacts to area roadways that were not analyzed. Therefore, it is recommended that a condition of approval be included for the ADM and The Graham Project CDMP submittals that they are contingent upon obtaining the requisite FDOT and FHWA approvals for the proposed interchange access changes. If any of the relied upon transportation improvements are not approved, a re-evaluation of the traffic impact analysis will be necessary.

- 4) In Table 8, there are projects funded in Priority IV of the 2040 Long Range Transportation Plan (LRTP) and assumed to open in different years, such as NW 170<sup>th</sup> Street from HEFT to NW 97<sup>th</sup> Avenue. Please provide clarification about how the applicant intends to advance these projects such that they are constructed by the year used in the traffic analysis. The funding source and commitment must be clarified for these improvements.

#### **Section 4.0 – Existing Conditions (Year 2015)**

- 5) As noted on page 8, please clarify the source for the directional split factors used to convert non-directional service volumes from the Miami-Dade database.
- 6) Please describe the source and justification for applying an assumed 1% growth to extrapolate 2014 volumes to 2015 existing conditions.

- 7) In the first bullet on page 8, please consider adjusting the eastern limit of the HEFT project to NW 27<sup>th</sup> Avenue.

### **Section 5.0 - Trip Generation**

- 8) The total acreage for The Graham Project in Table 3 does not match the total acreage in Table 2. Please revise the appropriate table to maintain consistency of the property's acreage throughout the report.
- 9) Pursuant to the ITE Trip Generation Handbook, "*Diverted linked trips are trips that are attracted from the traffic volume on roadways within the vicinity of the generator but require a diversion from that roadway to another roadway to gain access to the site.*" Since trips to ADM and The Graham Project travel to both generators via limited access facilities adjacent to the sites, they add traffic to streets that directly connect to the sites. As a result, these trips are classified as diverted linked trips and not pass-by trips. Please revise the trip generation analysis accordingly for both ADM and The Graham Project.

In addition, such diverted linked trips must be accounted for when evaluating the project's impact on the adjacent streets that connect directly to both sites. Please revise the roadway link analysis (summarized in Tables 9 and 10) and include diverted linked trips assigned to Miami Gardens Drive, NW 170<sup>th</sup> Street and NW 178<sup>th</sup> Street. The revised roadway link analysis should include these diverted linked trips, a text description of what these diverted linked trips represent, a summary of the calculations to quantify these trips and a graphic that depicts where these trips are assigned to the roadway network.

- 10) Regarding the pass-by trip percentages from ITE code 820: Shopping Center, The Graham Project uses 35% in 2020 (150 KSF) and 20% in 2040 (1,000 KSF). ADM uses 14% (3,500 KSF). There is no fitted curve in the 3<sup>rd</sup> edition of the ITE Handbook (latest version), and there is no evidence to suggest that the curve would flatten at 900 KSF, beyond which there are only four data points. A fitted curve for this data would most likely be under 20% for the 2040 Graham Companies property and below 10% for the ADM (which would be 3 graph lengths away from the end of this plot). Basing the pass-by rate on the three data points over 1,000 KSF is not a statistically valid methodology. A more appropriate methodology would utilize a curve or other observed data.



Please revise the trip generation analysis accordingly for both ADM and The Graham Project.

Additionally, please provide the calculations confirming the “pass-by”/diverted linked trip reduction reasonableness check to ensure it represents no more than 10% of the volume of the adjacent street. Such a check should be performed separately for ADM and The Graham Project.

- 11) In Table 6, an auto occupancy factor of 2.3 is reported, but it is not clear how this factor was derived. The Mall of America (MOA) Survey data cited in Appendix G indicates that the size of a typical party surveyed at MOA breaks down as 44% 1 person, 35% 2 person, 21% 3+ people. Assuming the average party size in the 3+ category is 3.5, then the average party size would be 1.9. It is unclear if a cross-classification of mode of travel and size of party was analyzed to specify the size of party for users of personal automobiles. Please clarify the methodology used to calculate the reported auto occupancy value of 2.3, and include in the report the calculations supporting the text.
- 12) The assumption that trip rates derived for GLA (Retail) from MOA can be applied directly to the retail GLA of ADM is questionable. The implicit assumption is that the non-retail portions of the MOA and ADM will have similar trip generation characteristics. Currently, the only support provided is that the retail square footage as a proportion of the gross floor area is similar. But a comparison of the non-retail square footage of the two developments is not discussed in the application.

From previous information provided by ADM, the non-retail portion of MOA consists of 31% common areas, compared to 19% common areas in the ADM development. While the proportion of retail GLA in the two developments is comparable (at 56% for ADM and 59% for MOA), the proportion of non-retail attractions in the two developments is not (with 24% in ADM and 11% in MOA). Given this discrepancy, FDOT recommends that Gross Floor Area (GFA) be used as the independent variable for the trip generation analysis to ensure that the total proposed development intensity of 6.2 million square feet is included in the analysis.

Finally, please clarify the apparent discrepancy of GLA square footage reported in Tables 4 and 6 that distinguish between entertainment and retail uses.

- 13) For internal capture calculations for the Graham Companies property, please consider using the internal capture rates for origins and destinations within a multi-use development found in the FDOT Trip Generation Recommendations Report, October 2014, as well as National Cooperative Highway Research Program (NCHRP) Report 684. Excerpts of the relevant pages from this document and the ITE Trip Generation Handbook are attached for your convenience.

#### **Section 7.0 – Project Trip Distribution and Assignment**

- 14) Using MOA data, ADM and The Graham Project assumed that approximately 30% of all trips are non-regional. It is stated in the CDMP traffic analysis that modelling efforts were made to distribute this magnitude of volume to HEFT and I-75. To verify that the travel characteristics associated with MOA in Minneapolis are comparable to ADM in Miami, it is recommended that additional documentation be provided to substantiate the non-regional trip assumption. This should include a tabular summary comparing several trip generators that attract non-regional trips to document and verify the proposed 30% assignment. Potential large scale retail uses to review that attract non-regional traffic include Sawgrass Mills Mall, which also is located within the area covered by the Southeast Regional Planning Model (SERPM).

This additional documentation also should include accurate model network plots in Appendix H to depict all centroids for ADM. Please note that the impact of the study area links definition must be described in the report. If ADM's trip length frequency distribution is underestimated, it is possible that impacts to roadways and the number of impacted roadway segments also are underestimated.

- 15) The land use data factoring cited in the second paragraph on page 25 is unclear. The applicant should add text to the report clarifying what is meant by factoring and the impact of doing so.



- 16) Please include text in the report describing the reasonableness of the model's performance. The applicant must analyze and document the study area link volumes relative to counts. Study area links representing new roadways are of particular concern because model volumes are utilized as the only source of traffic data for these links.

#### **Section 8.0 – Build-Out Conditions (Years 2020 & 2040)**

- 17) The method utilized to compute 2020 and 2040 build-out level of service (LOS) in Tables 9 and 10, respectively, distinguishes diverted trip route segments for which pass-by reduction is not applied (shaded in green in the tables). The project trip estimates used to compute volumes for these links should be the Net External Trips, rather than New External Trips (from Table 6). Neither appear to be used for the diverted trip route segment. The computations for project traffic on those links must be clarified and revised, as applicable.

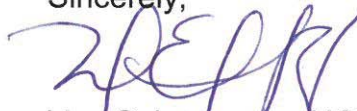
#### **Section 9.0 – Mitigation Analysis**

- 18) The transportation improvements identified in the submitted CDMP traffic impact analysis are based on PM peak hour traffic conditions. Please note that additional transportation improvements may be identified as part of the IAR documentation to address adverse impacts during AM and weekend peak periods that were not required as part of this CDMP evaluation.

The mitigation analysis portion of the traffic report also must clarify the funding commitment for the improvements and the entity responsible for constructing each improvement, and consider multimodal or transit mitigation measures.

Please contact me at 305-470-5386, or Lisa Dykstra at 954-777-4360, if you have any questions concerning our comments.

Sincerely,



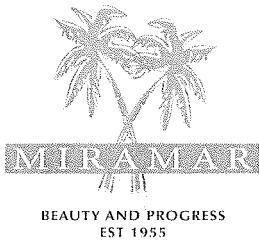
Lisa Colmenares, AICP  
Planning Manager



Deputy Mayor Jack Osterholt  
January 28, 2016  
Page 8

Enclosures: Excerpts from NCHRP Report 684 and the ITE Trip Generation Handbook

cc: Harold Desdunes, Florida Department of Transportation, District Six  
Stacie Miller, Florida Department of Transportation, District Four  
Steve Braun, Florida Department of Transportation, District Four  
Carl Filer, Florida Department of Transportation, District Six  
Lisa Dykstra, Florida Department of Transportation, District Four  
Isabel Cosio-Caraballo, South Florida Regional Council



## CITY OF MIRAMAR

An Equal Opportunity Employer

### Mayor

Wayne M. Messam

### Vice Mayor

Darline B. Riggs

### City Commission

Winston F. Barnes

Maxwell B. Chambers

Yvette Colbourne

### City Manager

Kathleen Woods-Richardson

"We're at the  
Center of Everything"

### **Community & Economic Development**

2200 Civic Center Place  
Miramar, Florida 33025

Phone (954) 602-3264  
FAX (954) 602-3448

February 2, 2016

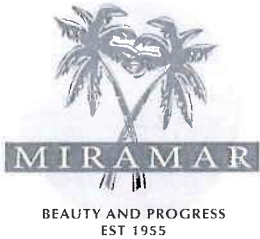
Mr. Mark Woerner, AICP  
Assistant Director for Planning  
Miami-Dade County - Department of Regulatory and Economic Resources  
111 NW 1<sup>st</sup> Street, 12<sup>th</sup> Floor  
Miami, Florida 33128

### **Re: American Dream Miami and Graham Properties CDMP Amendment Applications**

Dear Mr. Woerner:

City of Miramar staff has reviewed the American Dream Miami (ADM) and Graham Properties Comprehensive Development Master Plan amendment applications. Major highways connect both of these large scale mixed-use developments to urban centers within the City. Staff offers the following comments related to these applications.

1. Direct transit service should be provided from the American Dream Miami Mall and Graham industrial/retail development to the park and ride lot at Miramar Regional Park and the Miramar Town Center/Park and Ride.
2. At a minimum, the analysis should evaluate traffic impacts to Miramar Parkway, Pembroke Road, Red Road/NW 57<sup>th</sup> Avenue and Flamingo Road/NW 67<sup>th</sup> Avenue. A level of service analysis at project buildout should be provided for all of these roadways.
3. The Miramar Parkway buildout year volumes shown in Tables 9 and 10 of the Transportation Impact Analysis are lower than projections prepared by the Broward Metropolitan Planning Organization. The developer's traffic consultant should meet with the City of Miramar, Broward County, and Broward Metropolitan Planning Organization to discuss the impacts to City roadways and potential mitigation. The City is in the process of updating its Capital Improvement Program to include the extension of Miramar Parkway from its current terminus at SW 192 Terrace to Pembroke Road at SW 196 Avenue. The extension of Miramar Parkway to Pembroke Road will help alleviate the current traffic problem at Miramar Parkway/I-75 Interchange, improve the Level of Service at this intersection and provide an alternate north-south route via US 27.
4. Please provide the housing demand expected to be generated by both projects.



## CITY OF MIRAMAR

An Equal Opportunity Employer

Thank you for the opportunity to comment on these applications. Feel free to contact me with any questions on the City's comments.

Sincerely,

Eric Silva, AICP  
Director

Cc: Kathleen Gunn, Assistant City Manager  
Michael Moore, Chief Operations Officer  
Luisa Millan, Director  
Bissy Vempala, P.E., City Engineer  
Jo Sesodia, Broward County Planning and Development Management  
Greg Stuart, Broward Metropolitan Planning Organization

"We're at the  
Center of Everything"

### Community & Economic Development

2200 Civic Center Place  
Miramar, Florida 33025

Phone (954) 602-3264  
FAX (954) 602-3448

**Stillings, Noel (RER)**

---

**From:** Stillings, Noel (RER)  
**Sent:** Tuesday, February 09, 2016 9:21 AM  
**To:** 'scot.leftwich@lce-fl.com'; 'jmt@lce-fl.com'; csweet@bellsouth.net; 'andre.groenhoff@gmail.com'  
**Cc:** 'mgonzalez@cityofhialeahgardens.com'; 'schaadb@miamilakes-fl.gov'; 'reya@miamilakes-fl.gov'; 'dstorch@hialeahfl.gov'; 'jehernandez@hialeahfl.gov'; Guim, Raquel (RER); Pino, Raul (RER); Rowe, Garrett A. (RER); Gomez, Lourdes (RER); Somoza, Napoleon (RER); Woerner, Mark (RER)  
**Subject:** Nov. 2015 CDMP Applications - Development Potential around ADM and Graham Cos. Applications  
**Attachments:** Nov 2015 CDMP Cycle Apps 1 2 T-Plat table Revised 2.docx

Please find attached table for your information and consideration detailing the platted, vacant, and non-platted areas within the vicinity of the ADM and Graham Cos. Applications.

Regards,

Noel Stillings, Senior Planner

**Planning Division, Metropolitan Planning Section**

**Miami-Dade County Department of Regulatory and Economic Resources**

111 NW 1st Street, 12th floor, Miami, Florida 33128

**Phone: (305) 375-2835** ext. 96535

Platted Parcels in the Cities of Hialeah, Hialeah Gardens, and Unincorporated Miami-Dade County and Potential Development

No. on Map	T-Plat	Project Name/ Owner	Location	Folio Nos.	Area (Acres/ Sq. Ft.	Jurisdiction	CDMP Land Use	Proposed Development	Traffic Report submitted
1	T-23557	Bonterra	NW 154 St. & NW 97 Ave.	04-2021-001- 0330, 0170, 0320, 0180, 0310, 0190, 0300, 0200, 0280, and 0210		City of Hialeah	Residential	487 SF 370 Townhouses 314 Apartments	Yes
2	T-23444	Bellagio Villas	W 138 St. & W 36 Ave.			City of Hialeah	Residential	170 Townhouses	Yes
3	T-23371	Bellagio	NW 138 St. & NW 97 Ave.	04-2021-029-4160		City of Hialeah	Residential	209 SF 206 Townhouses	Yes
4	T-23690	Erudition	NW 162 St. & NW 97 Ave.	04-2017-001-0491 04-2017-001-0080 04-2017-001-0081		City of Hialeah	Industrial	282 hotel rooms 73,500 sq. ft. school	Contact city
5	T-22967	AMB I-75 Business Park	NW 170 St. & NW 97 Ave.	30-2009-001-0475, 0340,0460,0350, 0450,0360, 0370, 0380, 0390, & 0400		Unincorporated Miami-Dade	Industrial	1.1 million sq. ft. warehouses	Yes
6	T-23241	Liebherr Tract	NW 154 St. & NW 107 Ave.	27-2019-003-0010		Hialeah Gardens	Industrial	41,588 sq. ft. office 32,421 sq. ft. warehouse	Contact city
7	T-23361	Teba Subdivision	NW 144 St. & NW 109 Ave.	27-2019-004-0010		Hialeah Gardens	Industrial	3,375 sq. ft. warehouse 1,753 sq. ft. office	Contact city
8	T-23141 (Not active)	Preferred Freezer Hialeah Gardens	NW 138 St. & NW 112 Ave.	27-2019-001-0640		Hialeah Gardens	Industrial	120,000 sq. ft. warehouse	Contact city
Subtotal		Single-family=696 units Townhouses=746 units Apts./Multi-family=314 Hotel Rooms=282 School=73,500 sq. ft. Warehouse=1,255,796 sq. ft. Office=43,341 sq. ft.							



Vacant, Non-Platted Parcels in the City of Hialeah, Hialeah Gardens and Unincorporated Miami-Dade County and Potential Development

No. on Map	T-Plat	Project Name/ Owner	Location	Folio Nos.	Area (Acres/ Sq. Ft.)	Jurisdiction	CDMP Land Use	Proposed Development	Traffic Report submitted
9		FDG Beacon Countyline, LLC	NW 170 St. to NW 154 St. & NW 107 Ave. to NW 97 Ave.	Several folios		City of Hialeah	Industrial	Approx. 9,000,000 sq. ft. warehouse	
10		Sevilla Group & Irving Friedman TR	NW 170 St. & NW 97 Ave.	30-2009-001-0430 & 0431, and 30- 2009-001-0412	54,450 sq. ft. 163,350 sq. ft. 386,813 sq. ft.	Unincorporated Miami-Dade	Industrial	302,307 sq. ft. Warehouses	
11		FP&L	NW 170 St. & NW 97 Ave.	04-2016-000-0860	107,985 sq. ft. (2.48 acres)	City of Hialeah	Residential	Power Station	
12		Atlas Hlh Heights LLC	NW 170 St. & NW 97 Ave.	04-2016-000-0011	4,888,303 sq. ft. (112.22 acres)	City of Hialeah	Residential	1,458 Townhomes	
13		F78 1 LLC	NW 160 St. & I-75	04-2016-000-0100	249,686 sq. ft. (5.75 acres)	City of Hialeah	Residential	74 Townhomes	
14		Lowell S. Dunn	NW 97 ave. & I-75	04-2016-000-0110	2,829,875 sq. ft. (64.96 acres)	City of Hialeah	Residential	844 Townhomes	
15		Lowell S. Dunn	NW 97 Ave. & NW 154 St.	04-2016-000-0060	2,597,918 sq. ft. (59.64 acres)	City of Hialeah	Residential	775 Townhomes	
16		F69 1 LLC F71 1 LLC	NW 87 Ave. & NW 154 St.	32-2015-001-0500 32-2016-000-0020	2,547,485 sq. ft. (58.48 acres) 6,729,497 sq. ft. (154.49 acres)	Miami Lakes	Residential	256 SF 226 Townhomes	
17		Northwest School Property LLC	NW 89 Ave. & NW 186 St.	30-2009-001-0140 30-2009-001-0140	258,529 sq. ft. (5.95 ares.) 171,932 sq. ft. (3.95 acres)	Unincorporated Miami-Dade	Office /Residential	Charter School:1,500 students (K-12)	
18		The Genet Family Limited Partners	NW 87 Ave. & NW 186 St.	30-2009-001-0010	1,225,648 sq. ft. (28.14 ac)	Unincorporated Miami-Dade	Business and Office	248,508 sq. ft. Commercial	
Subtotal									Single-family=256 units Townhouses=3,377 School=1,500 students Warehouse=9,302,307 sq. ft. Power Station=1 Commercial = 248,508 sq. ft.

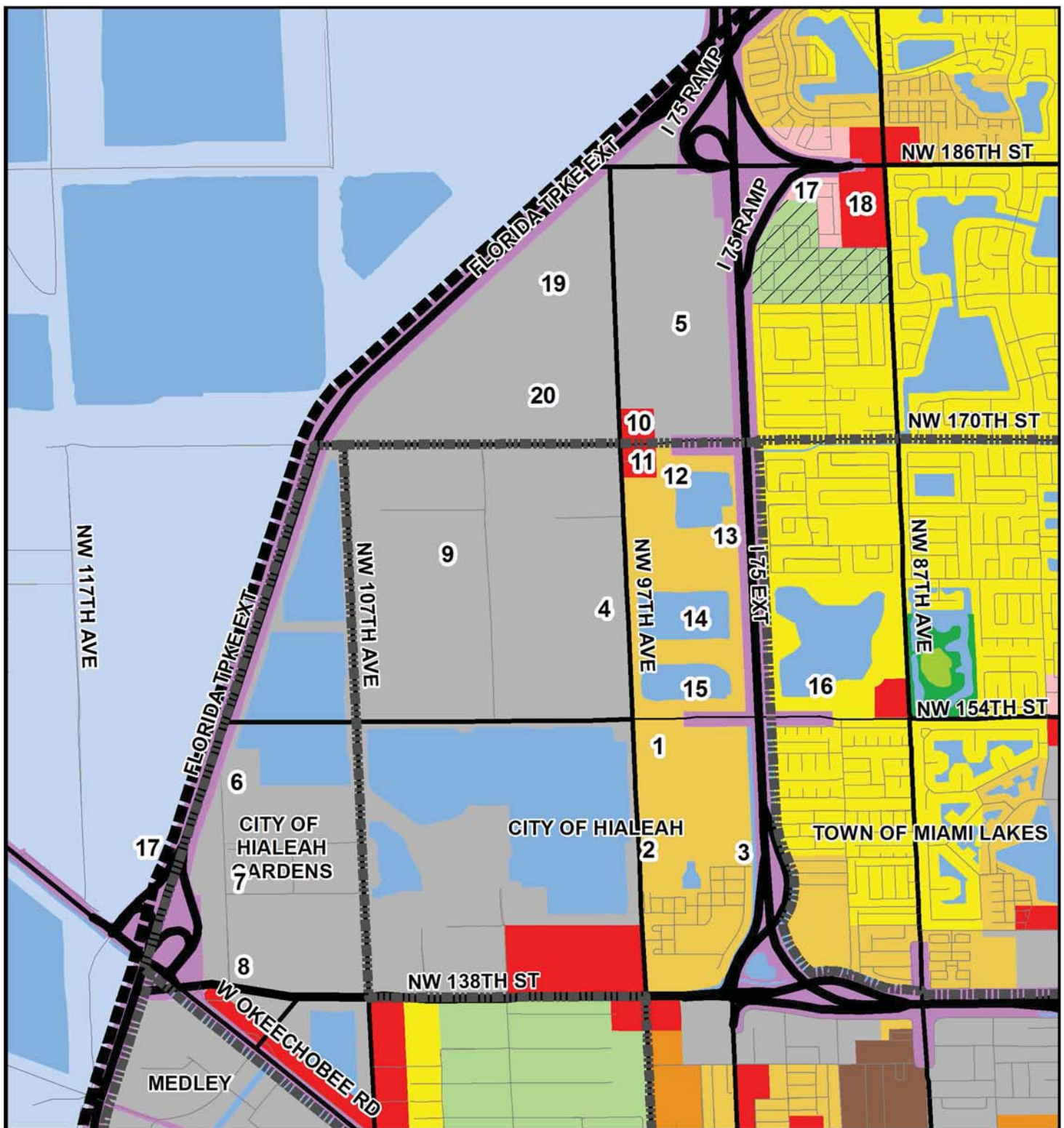
November 2015 CDMP Amendment Application Sites in Unincorporated Miami-Dade County and Potential Development

No. on Map	T-Plat	Project Name/ Owner	Location	Folio Nos.	Area (Acres/ Sq. Ft.	Jurisdiction	CDMP Land Use	Proposed Development	Traffic Report submitted
19		ADM (CDMP Application)	N of NW 178 St. betw. I-75 & HEFT		194.48 gross	Unincorporated Miami-Dade County	Industrial and Office	3,500,000 sq. ft. Retail 1,500,000 sq. ft. Entertainment 2,000 Hotel Rooms 1,200,000 sq. ft. Back of House	Yes (but to be revised)
20		Graham Co. (CDMP Application)	betw. NW 170 St. & NW 178 St., & betw. I- 75 & HEFT		339 gross	Unincorporated Miami-Dade County	Industrial and Office and Business and Office	2,000 Multi-family units 1,000,000 sq. ft. Retail 3,000,000 sq. ft. Business park (includes 1600 hotel rooms)	Yes (but to be revised)
Subtotal		Retail=4,500,000 sq. ft. Entertainment=1,500,000 sq. ft. Hotel Rooms=3,600 Business Park = 3,000,000 sq. ft. Apts.=2,000 units Common Area/Back of house=1,200,000 sq. ft.							

Total Potential Development for Platted, Non-Platted, Vacant, and CDMP Amendment Applications

No. on Map	T-Plat	Project Name/ Owner	Location	Folio Nos.	Area (Acres/ Sq. Ft.)	Jurisdiction	CDMP Land Use	Proposed Development	Traffic Report submitted
<b>TOTAL</b>								<b>TOTALS:</b> Single-family= 952 units Townhouses=4,123 units Apts/Multi-family=2,314 units Retail=4,748,508 sq. ft. Hotel rooms=3,882 Warehouse=10,558,103 sq. ft. Schools=73,500 sq. ft. and 1,500 students Office=43,431 sq. ft. Business Park= 3,000,000 sq. ft. Entertainment=1,500,000 sq. ft. Power Station=1 Common Area/Back of house=1,200,000 sq. ft.	

Source: RER, Planning Division and RER, Platting and Traffic Review Division, February 2016



#### CDMP LAND USE

- ESTATE DENSITY (1-2.5 DU/AC)
- ESTATE DENSITY W/ DENSITY INCREASE 1
- LOW DENSITY (2.5-6 DU/AC)
- LOW-MEDIUM DENSITY (6-13 DU/AC)
- MEDIUM DENSITY (13-25 DU/AC)
- MEDIUM-HIGH DENSITY (25-60 DU/AC)
- INDUSTRIAL AND OFFICE
- BUSINESS AND OFFICE
- OFFICE/RESIDENTIAL

- PARKS AND RECREATION
- OPEN LAND
- ENVIRONMENTALLY PROTECTED PARKS
- WATER
- TRANSPORTATION (ROW, RAIL, METRORAIL, ETC.)
- EXPRESSWAYS
- MAJOR ROADWAYS (3 OR MORE LANES)
- MINOR ROADWAYS (2 OR MORE LANES)
- 2020 URBAN DEVELOPMENT BOUNDARY
- MUNICIPAL BOUNDARY

0 0.25 0.5  
Miles



## Stillings, Noel (RER)

---

**Subject:** FW: American Dream Miami Trip Generation Discussion 02.19.16 Materials  
**Attachments:** Table 6 Revision\_021916.pdf; Additional Sourcesr.pdf

---

**From:** James Taylor [jmt@lce-fl.com]  
**Sent:** Tuesday, February 23, 2016 1:09 PM  
**To:** Woerner, Mark (RER)  
**Cc:** 'Scot Leftwich, Ph.D., P.E.'; Andre Groenhoff; 'Robert Gorlow'  
**Subject:** American Dream Miami Trip Generation Discussion 02.19.16 Materials

Mark,

Thank you again for taking the time on Friday to discuss the American Dream Miami CDMP TIA comments to date. For your review, please find attached a summary of the proposed revision for Table 6: Trip Generation Summary for American Dream Miami for upcoming CDMP TIA revision. We have also included the Table 6 from the December submittal and the alternative analysis discussed on Friday showing another method which arrives at nearly the same result.

We propose to include the proposed revision in the revised CDMP TIA to address all agency comments received to date on trip generation. We appreciate that you have offered to review the new trip generation proposal within a week's time. We have reached out to FDOT to discuss the same.

Most of the source material used to revise the trip generation summary is already included in the CDMP TIA submitted in December 2015, however, some additional back-up materials has been included per our trip generation discussion on Friday. Additionally, here are links to a couple of reports we made mention of during the presentation:

[http://www.miamiandbeaches.com/~media/files/gmcvb/partners/research%20statistics/annual\\_report\\_2014](http://www.miamiandbeaches.com/~media/files/gmcvb/partners/research%20statistics/annual_report_2014)

[http://www.teaconnect.org/images/files/TEA\\_103\\_49736\\_150603.pdf](http://www.teaconnect.org/images/files/TEA_103_49736_150603.pdf)

Please feel free to have your staff reach out with any questions or concerns.

Regards,  
James

-----  
James M. Taylor, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Tel: (407) 281-8100, ext. 205  
Fax: (407) 249-2212  
Email: [jmt@lce-fl.com](mailto:jmt@lce-fl.com)  
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**Table 6 (December 2015 CDMP): Trip Generation Summary for American Dream Miami**

Land Use	ITE Code	Size	Units	Trip Rates		Trips					
				Daily	PM Peak	Daily	PM Peak Hour				
							Total	In		Out	
Entertainment/Retail (GLA)	-	3,500	KSF	19.21	1.46	67,251	5,098	48%	2,447	52%	2,651
<b>Total Generated Trips</b> (pre-LRT adjustment)						<b>67,251</b>	<b>5,098</b>		<b>2,447</b>		<b>2,651</b>
PM Internal Capture =	0.0%					0	0		0		0
<b>Net External Trips</b> (pre-LRT adjustment)						<b>67,251</b>	<b>5,098</b>		<b>2,447</b>		<b>2,651</b>
LRT Adjustment =	10.8%	of net external trips				4,682	355		170		185
<b>Net External Trips</b>						<b>71,933</b>	<b>5,453</b>		<b>2,617</b>		<b>2,836</b>
Passerby Trips =	14.0%	of net external trips				10,071	763		343		420
<b>New External Trips</b>						<b>61,862</b>	<b>4,690</b>		<b>2,274</b>		<b>2,416</b>

Notes:

- Rates shown in units of external vehicle trips per period per 1,000 square feet of retail GLA where American Dream Miami consists of 3,500 ksf retail GLA within 6,200 ksf GFA (includes entertainment) plus hotel.
- Surveys at MOA show 10.8% LRT trips. This % added back into ADM with MOA auto occupancy of 2.3 applied.
- Diverted trips calculated from ITE's fitted curve for Shopping Center pass-by %.

**Table 6 (Proposed Revision): Trip Generation Summary for American Dream Miami**

Land Use	ITE Code	Size	Units	Trip Rates		Trips					
				Daily	PM Peak	Daily	PM Peak Hour				
							Total	In		Out	
Entertainment/Retail (GFA)	-	6,200	KSF	11.26	0.85	69,822	5,293	48%	2,541	52%	2,752
<b>Total Generated Trips</b> (pre-LRT adjustment)						<b>69,822</b>	<b>5,293</b>		<b>2,541</b>		<b>2,752</b>
PM Internal Capture =	0.0%					0	0		0		0
<b>Net External Trips</b> (pre-LRT adjustment)						<b>69,822</b>	<b>5,293</b>		<b>2,541</b>		<b>2,752</b>
LRT Adjustment =	10.8%	of net external trips				6,481	491		236		255
<b>Net External Trips</b>						<b>76,303</b>	<b>5,784</b>		<b>2,777</b>		<b>3,007</b>
Diverted Trips =	9.7%	of net external trips				5,995	454		200		254
<b>New External Trips</b>						<b>70,308</b>	<b>5,330</b>		<b>2,577</b>		<b>2,753</b>

Notes:

- Entertainment/Retail Trip Rates derived from Mall of America (MOA) external trip generation as provided in Table 5 per 1,000 ksf of Gross Floor Area (GFA). Two (2) independent counts report for MOA provided in Appendix F.
- LRT Adjustment = (Unadjusted Net External Trips)(10.8%)(2.3 MOA AVO / 3.0 Conservative FL Attraction AVO)
- Diverted trip reduction percentage reduced from 14% per ITE's Shopping Center Pass-by fitted rate to 9.7% based on fitted curve only using 3 highest ITE Shopping Center data points (all > 1 msf) plus data from two large Florida retail attractions (Florida Mall and Galleria Mall) provided in Appendix TBD
- Diverted trip reduction only applied to 81% of net external trips (those trips not associated with entertainment/other use) per Cambridge MOA survey provided in per Appendix G

**Table 6 (Alternative Analysis): Trip Generation Summary for American Dream Miami**

Land Use	ITE Code	Size	Units	Trip Rates		Trips					
				Daily	PM Peak	Daily	PM Peak Hour				
							Total	In		Out	
Entertainment/Retail (GFA)	-	6,200	KSF	11.26	0.85	69,822	5,293	48%	2,541	52%	2,752
Trips for Increased Entertainment	-	836	KSF	2.14	0.16	1,789	136	48%	65	52%	71
<b>Total Generated Trips</b> (pre-LRT adjustment)						<b>71,611</b>	<b>5,429</b>		<b>2,606</b>		<b>2,823</b>
PM Internal Capture =	0.0%					0	0		0		0
<b>Net External Trips</b> (pre-LRT adjustment)						<b>71,611</b>	<b>5,429</b>		<b>2,606</b>		<b>2,823</b>
LRT Adjustment =	10.8%	of net external trips				6,647	504		242		262
<b>Net External Trips</b>						<b>78,258</b>	<b>5,933</b>		<b>2,848</b>		<b>3,085</b>
Diverted Trips =	9.7%	of net external trips				6,149	466		200		266
<b>New External Trips</b>						<b>72,109</b>	<b>5,467</b>		<b>2,648</b>		<b>2,819</b>

Notes:

- Entertainment/Retail Trip Rates derived from Mall of America (MOA) external trip generation as provided in Table 5 per 1,000 ksf of Gross Floor Area (GFA). Two (2) independent counts report for MOA provided in Appendix F.
- Increased Entertainment (the additional amount of entertainment at ADM above the equivalent MOA proportion = 1,500 ksf (ADM) – 471.8 ksf (MOA) \* 6,200 KSF / 4,405 ksf (% Increase of GFA) = 835.9 ksf GFA
- Increased Entertainment Trip Rates = Base Mixed Entertainment/Retail Rates \* 19% (those trips associated with entertainment/other use per Cambridge MOA survey provided in Appendix G)
- LRT Adjustment = (Unadjusted Net External Trips)(10.8%)(2.3 MOA AVO / 3.0 Conservative FL Attraction AVO)
- Diverted trip reduction percentage reduced from 14% per ITE's Shopping Center Pass-by fitted rate to 9.7% based on fitted curve only using 3 highest ITE Shopping Center data points (all > 1 msf) plus data from two large Florida project surveys (Florida Mall and Galleria Mall) provided in Appendix TBD
- Diverted trip reduction only applied to 81% of net external trips (those trips not associated with entertainment/other use) per Cambridge MOA survey provided in Appendix G

## Stillings, Noel (RER)

---

**From:** Khan, Muhammad (PWWM)  
**Sent:** Thursday, February 25, 2016 3:59 PM  
**To:** Woerner, Mark (RER); Guyamier, Frank (MDT); Somoza, Napoleon (RER); Fernandez, Darlene (PWWM)  
**Cc:** Osterholt, Jack (Office of the Mayor); Gomez, Lourdes (RER)  
**Subject:** RE: American Dream Miami Trip Generation Discussion 02.19.16 Materials  
**Attachments:** Table 6 Revision\_021916.pdf; Additional Sourcesr.pdf

Good afternoon Mark,

Please see below our comments regarding the provided trip generation presentation and additional documents:

1. The morning AM peak hour and Saturday peak hour trip generations are missing in analysis provided. The earlier AM and Saturday trip generations provided should be revised based on updated methodology.
2. Please note that this review does not cover any outstanding comments related to the Graham project, which was included in the combined CDMP December 2015 transportation analysis.
3. On slide 4, the source for MOA trips trend was not found. Please verify if the graph for MOA trip trend represents the monthly traffic variations in two trip generation studies (June and August 2015) done for MOA.
4. On slide 9, a vehicle occupancy of 3.0 to 4.0 persons/vehicles is mentioned to be used. However, review of slides 10 and 15 indicates that, this factor is 3.0 for all the theme parks. Please verify and revise the text accordingly. Furthermore, supporting document/study be provided for 3.0 vehicle occupancy.
5. Phase 2 is mentioned on slide 19 for MOA to accommodate additional demand for hotel use. Please add details of Phase 2 in the upcoming study for our records.
6. In December 2015 CDMP study Appendix A2, the hotel rooms are mentioned to be 506 for MOA as compared to 503 on slide 21 in this study. Please verify and revise accordingly.
7. The summary on slides 25 and 26 presents a better approach for potential pass-by value at ADM. However, the Galleria Mall, FL appears significantly dissimilar to ADM. Since this mall has significant higher pass-by value, smaller size, is close to a major tourist destination (the beach) and is located along heavily used surface street with convenient access instead of an expressway like in ADM. Therefore, it is recommended that it be eliminated from samples. In addition, the other locations should be evaluated for such parameters.
8. On slide 27, the IN and OUT percentages are shown as 48 and 52, respectively. However, in earlier CDMP study, these percentages are 49 and 51 as shown in Appendix F. Please explain the difference and revise accordingly.
9. As mentioned in earlier meeting that FDOT District 4 and 6 have significant comments for trip generation which should also be addressed accordingly.

We look forward to working with the applicant for later phases of the traffic impact study. Please do not hesitate to contact us, if you have any concerns.

Regards,

Muhammad Asif Khan, P.E., PTP, PTOE, Professional Engineer

Traffic Engineering Division

**Miami Dade County**

**Department of Transportation  
and Public Works**

111 NW 1st Street, Suite 1510, Miami, Florida, 33128-1970

Phone: 305-375-2030 - Fax: 305-372-6064

[khanm@miamidade.gov](mailto:khanm@miamidade.gov)

<http://www.miamidade.gov/pubworks/>

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**From:** Woerner, Mark (RER)

**Sent:** Tuesday, February 23, 2016 4:15 PM

**To:** Guyamier, Frank (MDT); Somoza, Napoleon (RER); Fernandez, Darlene (PWWM); Khan, Muhammad (PWWM)

**Cc:** Osterholt, Jack (Office of the Mayor); Gomez, Lourdes (RER)

**Subject:** FW: American Dream Miami Trip Generation Discussion 02.19.16 Materials

Hi all;

This is just their revised trip gen based on last Friday's meeting. We need to review this material by Friday to determine if it is sufficient for the analysis.

thanks,

Mark

---

**From:** James Taylor [[jmt@lce-fl.com](mailto:jmt@lce-fl.com)]

**Sent:** Tuesday, February 23, 2016 1:09 PM

**To:** Woerner, Mark (RER)

**Cc:** 'Scot Leftwich, Ph.D., P.E.'; Andre Groenhoff; 'Robert Gorlow'

**Subject:** American Dream Miami Trip Generation Discussion 02.19.16 Materials

Mark,

Thank you again for taking the time on Friday to discuss the American Dream Miami CDMP TIA comments to date. For your review, please find attached a summary of the proposed revision for Table 6: Trip Generation Summary for American Dream Miami for upcoming CDMP TIA revision. We have also included the Table 6 from the December submittal and the alternative analysis discussed on Friday showing another method which arrives at nearly the same result.

We propose to include the proposed revision in the revised CDMP TIA to address all agency comments received to date on trip generation. We appreciate that you have offered to review the new trip generation proposal within a week's time. We have reached out to FDOT to discuss the same.

Most of the source material used to revise the trip generation summary is already included in the CDMP TIA submitted in December 2015, however, some additional back-up materials has been included per our trip generation discussion on Friday. Additionally, here are links to a couple of reports we made mention of during the presentation:

[http://www.miamiandbeaches.com/~media/files/gmcbv/partners/research%20statistics/annual\\_report\\_2014](http://www.miamiandbeaches.com/~media/files/gmcbv/partners/research%20statistics/annual_report_2014)



[http://www.teaconnect.org/images/files/TEA\\_103\\_49736\\_150603.pdf](http://www.teaconnect.org/images/files/TEA_103_49736_150603.pdf)

Please feel free to have your staff reach out with any questions or concerns.

Regards,  
James

---

James M. Taylor, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Tel: (407) 281-8100, ext. 205  
Fax: (407) 249-2212  
Email: [jmt@lce-fl.com](mailto:jmt@lce-fl.com)

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*Florida Department of Transportation*

RICK SCOTT  
GOVERNOR

1000 NW 111 Avenue  
Miami, FL 33172

JIM BOXOLD  
SECRETARY

March 7, 2016

Napoleon Somoza, Supervisor  
Miami-Dade County Department of Regulatory and Economic Resources Planning  
111 NW 1<sup>st</sup> Street, Suite 1220  
Miami, FL 33128-1972

**Subject: American Dream Miami Trip Generation Methodology  
for Comprehensive Development Master Plan (CDMP) Amendment**

Dear Mr. Somoza:

The Florida Department of Transportation, District Six, in cooperation with District Four, completed a joint review of the trip generation methodology analysis and revised Trip Generation Summary for American Dream Miami (Table 6 Revision\_021916.pdf), submitted to us by the applicant on March 1, 2016. The information represents a response to trip generation methodology concerns voiced by FDOT and others as part of the review of the Transportation Impact Analysis provided by the applicant in December 2015.

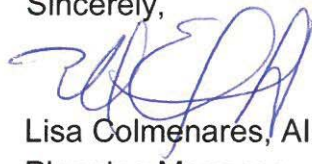
Based on the joint District Four and Six review, the following comments are offered.

- 1) The applicant utilized GFA in the revised results and has addressed the concern regarding the recommended use of Gross Floor Area (GFA) rather than Gross Leasable Area (GLA) to derive trip generation rates from the Mall of America (MOA) data.
- 2) Regarding the pass-by, or diverted link trip reduction rate, the applicant satisfied the districts' concern by revising the rate from 14% to 9.7%.

- 3) The LRT adjustment used to factor the MOA trip generation to account for the absence of light rail transit serving ADM should include a conversion of transit person trips to vehicle trips. The applicant suggests using a factor of 3.0 as the average vehicle occupancy, which is loosely derived from and adjusted downward from Florida theme park attendance data. Use of MOA trip generation rates and Florida theme park factors is inconsistent. It is recommended that available vehicle occupancy data from MOA of 2.3 be utilized to inform the LRT adjustment.
- 4) Regarding the hotel adjustment process, the applicant did not specifically address the internal capture concern previously raised, which has to do with the regional context of ADM vs. MOA. The applicant should demonstrate the applicability of regional context in the Minneapolis area to support a similar level of internal capture for ADM. Otherwise, it is recommended that the applicant develop a factor to account for a reduced internal capture rate at ADM, relative to MOA, due to the presence of a number of regional attractions that are likely to play a significant role in the itineraries of ADM visitors.

Please contact me at 305-470-5386, or Lisa Dykstra at 954-777-4360, if you have any questions concerning our comments.

Sincerely,



Lisa Colmenares, AICP  
Planning Manager

cc: Harold Desdunes, Florida Department of Transportation, District Six  
Stacie Miller, Florida Department of Transportation, District Four  
Steve Braun, Florida Department of Transportation, District Four  
Carl Filer, Florida Department of Transportation, District Six  
Omar Meitin, Florida Department of Transportation, District Six  
Lisa Dykstra, Florida Department of Transportation, District Four  
Isabel Cosio-Caraballo, South Florida Regional Council

**TECHNICAL MEMORANDUM**  
**March 14, 2016**  
**American Dream Miami (ADM) & Graham Project Trip Generation**

**RE:** Please see below County and FDOT comments and Applicant responses regarding trip generation for the above referenced project.

**Miami-Dade County Department of Transportation and Public Works – Mar 2, 2016**  
**(with regards to the Trip Generation Presentation provided Feb. 19, 2016)**

1. The morning AM peak hour and Saturday peak hour trip generations are missing in analysis provided. The earlier AM and Saturday trip generations provided should be revised based on updated methodology.

*LC: The Applicant intends to use the same methodologies presented at the 2/19 meeting (and per the presentation materials provided afterwards) for Daily, AM, PM and any weekend analysis to be provided. Specifically, the Applicant intends to perform the following for trip generation forecast at ADM:*

- A. Apply the total GFA trip rates observed at MOA to the total GFA proposed at ADM.*
- B. Make no adjustment at ADM for variations in entertainment % and hotel % or total GFA between the two projects even though making these adjustment could very likely drive the ADM trip rate per GFA down based on available data.*
- C. Reduce the LRT adjustment to account for a future AVO of 3.0 (instead of 4.0) at ADM despite data showing much larger AVO at large attractions in Florida.*
- D. Reduce pass-by/diverted reduction from 14% of total trips to 9.7% and only apply the reduction to the non-retail portion of total trips (81% of total trips). Verify the reduction does not exceed 10% of adjacent background volumes for any period.*

*The Applicant is proposing to move ahead with the CDMP revision and zoning analysis based on these conservative adjustments to the ADM trip generation forecast. Specifically, the revised Trip Generation Summary on Slide 27 shows the substantial impact of these adjustments on the Daily and PM peak project trips. These same adjustment would be applied for AM peak and weekend analysis.*

2. Please note that this review does not cover any outstanding comments related to the Graham project, which was included in the combined CDMP December 2015 transportation analysis.

*LC: Acknowledged. The proposed trip generation for the Graham Project is attached.*

3. On slide 4, the source for MOA trips trend was not found. Please verify if the graph for MOA trip trend represents the monthly traffic variations in two trip generation studies (June and August 2015) done for MOA.

*LC: The count reports from the independent count programs at MOA are found in Appendix F of the CDMP TIA. An attachment of the Kimley-Horn study labeled "Weekday Seasonal Factor" shows cumulative weekday inbound traffic data as taken at the MOA garages for every Wednesday in 2014. These counts were used to develop the MOA curve on Slide 4.*

4. On slide 9, a vehicle occupancy of 3.0 to 4.0 persons/vehicles is mentioned to be used. However, review of slides 10 and 15 indicates that, this factor is 3.0 for all the theme parks. Please verify and revise the text accordingly. Furthermore, supporting document/study be provided for 3.0 vehicle occupancy.

*LC: A rate of 3.0 AVO was used to convert Annual Attendance to ADT for each park to be conservative (Using a higher AVO would have resulted in lower entertainment rates). Surveys adopted for use in Central Florida's regional travel demand models show AVO closer to 4.0. Regardless and despite evidence to the contrary, the Applicant is proposing to apply the higher mixed-rate per GFA rates observe at MOA to all uses at ADM instead of the lower rates observed at the theme parks.*

5. Phase 2 is mentioned on slide 19 for MOA to accommodate additional demand for hotel use. Please add details of Phase 2 in the upcoming study for our records.

*LC: Per the MOA Phase II Traffic Study, the expansion consists of 1.458 msf retail/mixed-use, Bass Pro Shops (300 ksf), Performing Arts Center (6000 seats), 1,325 hotel units, 615 ksf office, and 300 condo units.*

6. In December 2015 CDMP study Appendix A2, the hotel rooms are mentioned to be 506 for MOA as compared to 503 on slide 21 in this study. Please verify and revise accordingly.

*LC: MOA has 506 hotel rooms.*

7. The summary on slides 25 and 26 presents a better approach for potential pass-by value at ADM. However, the Galleria Mall, FL appears significantly dissimilar to ADM. Since this mall has significant higher pass-by value, smaller size, is close to a major tourist destination (the beach) and is located along heavily used surface street with convenient access instead of an expressway like in ADM. Therefore, it is recommended that it be eliminated from samples. In addition, the other locations should be evaluated for such parameters.

*LC: The ADM forecast relies on the best data available, but due to the unique size of ADM there is little pass-by data to draw from. Despite it's imperfect comparison to ADM, the Galleria Mall was included in the data set because it is a large retail venue and it's located in FDOT D4. This approach of consensus building by using best available data is no different than for other more conventional projects which may have to rely on some imperfect ITE data sources to make a forecast. However, excluding the Galleria Mall from the data set*



*provided on Slide 26 at the request of Miami-Dade staff would result in a power fitted curve that would forecast an increase in pass-by at ADM (from 9.7% as presented to 11.5%). The Applicant is agreeable to this adjustment, but is still proposing the conservative 9.7%.*

8. On slide 27, the IN and OUT percentages are shown as 48 and 52, respectively. However, in earlier CDMP study, these percentages are 49 and 51 as shown in Appendix F. Please explain the difference and revise accordingly.

*LC: The PM peak hour In/Out split of 48%/52% shown in the revised Table 6 on Slide 27 is consistent with Table 6 of the December 2015 CDMP TIA. Presumably the 49%/51% split referred to in this comment from Appendix F of the CDMP TIA was from one of the two independent count reports conducted at MOA. The second count report at MOA observed a PM peak hour split of 47%/53%. The average weekday PM peak hour In/Out split for the two count studies was 48%/52% as propose for ADM. Coincidentally, this is the same split ITE provides for ITE 820 (Shopping Center).*

9. As mentioned in earlier meeting that FDOT District 4 and 6 have significant comments for trip generation which should also be addressed accordingly.

*LC: Consultants for the Applicant have provided the trip generation presentation to FDOT on March 1, 2016, received response March 7, 2016, and have addressed those comments by providing response to Miami-Dade County along with this comment set.*

We look forward to working with the applicant for later phases of the traffic impact study. Please do not hesitate to contact us, if you have any concerns.

Regards,

Muhammad Asif Khan, P.E., PTP, PTOE, Professional Engineer  
Traffic Engineering Division

**Miami Dade County**  
**Department of Transportation**  
**and Public Works**

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**FDOT District Four & District Six – Mar 7, 2016**  
**(with regards to the Trip Generation Presentation provided March 1, 2016)**

1. The applicant utilized GFA in the revised results and has addressed the concern regarding the recommended use of Gross Floor Area (GFA) rather than Gross Leasable Area (GLA) to derive trip generation rates from the Mall of America (MOA).

*LC: Acknowledged.*

2. Regarding the pass-by, or diverted link trip reduction rate, the applicant satisfied the districts' concern by revising the rate from 14% to 9.7%.

*LC: Acknowledged.*

3. The LRT adjustment used to factor the MOA trip generation to account for the absence of light rail transit serving ADM should include a conversion of transit person trips to vehicle trips. The applicant suggests using a factor of 3.0 as the average vehicle occupancy, which is loosely derived from and adjusted downward from Florida theme park data. Use of MOA trip generation rates and Florida theme park factors is inconsistent. It is recommended that available vehicle occupancy data from MOA of 2.3 be utilized to inform the LRT adjustment.

*LC: The Applicant contends the revised trip generation forecast performed for ADM is based on the best available data for this unique site and it is conservative for a number of reasons, as follows:*

- *The revised ADM trip generation shown on slide 27 of the presentation provided to FDOT on March 1, 2016 indicates an increase of more than 13% of PM peak hour new external trips above the previous CDMP submittal.*
- *The mixed-use external trip rate was adjusted upward by basing the generation on GFA instead of GLA despite traditional treatment of primarily shopping-based venues on ITE's code 820 (Shopping Center) GLA.*
- *ITE's Shopping Center data trend indicates bigger venues return lower trip rates in both the daily and peak hours. However, no reduction has been proposed from the MOA rates.*
- *Surveys presented from MOA show that 19% of external trip ends are hotel related. However, no reductions for external trips at ADM (where hotel supply is forecasted to be much closer to demand onsite) has been proposed.*
- *Encouraged by reviewing agencies to look into entertainment rates at theme parks in Central Florida, data was found that supported reducing the mixed-use MOA rate at ADM. However, no such reduction has been proposed.*
- *The pass-by/diverted rate for the retail portion of ADM has been reduced from the commonly used ITE Shopping Center methodology.*
- *AVO, expected to be higher in Florida and at the bigger venue, was kept constant for all trips except for the LRT adjustment.*
- *The 10.8% LRT ridership was taken from the highest end of the survey data range.*

*However, despite the evidence to decrease ADM trips for the reasons above, the Applicant has chosen to be conservative and make a less complex submittal in the hope of building consensus quicker among reviewing staff. To that end, the previously proposed adjustment for LRT was reduced from the 4.0 AVO rate observed in Central Florida theme parks and adopted for use in Central Florida's regional travel demand models to 3.0 AVO as a reasonable compromise and despite evidence to the contrary.*

4. Regarding the hotel adjustment process, the applicant did not specifically address the internal capture concern previously raised, which has to do with the regional context of ADM vs. MOA. The applicant should demonstrate the applicability of regional context in the Minneapolis area to support a similar level of internal capture for ADM. Otherwise, it is recommended that the applicant develop a factor to account for a reduced internal capture rate at ADM, relative to MOA, due to the presence of a number of regional attractions that are likely to play a significant role in the itineraries of ADM visitors.

*LC: The Applicant contends the revised trip generation forecast performed for ADM is based on the best available data for this unique site and is conservative. Note that no reductions have been made to the MOA mixed-use rate due to the larger size of ADM (increased capture, longer stays, bigger AVO) or due to extra external trips at MOA due to insufficient hotel supply (19% of MOA trips have a hotel trip end). The Applicant has decided against making such downward adjustments to the ADM trip generation forecast to encourage consensus among reviewing agencies in review of this unique project. However, at some point being overly conservative with the forecast becomes unrealistic and perhaps harmful to the Applicant. Note that ITE does not address regional variations with adjustment factors for their published rates. The Applicant proposes to maintain the revised trip generation that was adjusted up by more than 13% for new external PM peak hour trips as shown on Slide 27 of the trip generation presentation. We encourage FDOT to consider any uncertainty in the internal capture for ADM versus MOA impossible and unprecedented to account for, but that the other downward adjustments that were not pursued by the Applicant as an agreeable balance.*

**ADM & Graham Project Trip Generation**  
**March 14, 2016 Attachments**

- A. ADM Trip Generation (per Slide 27 of 2/19/16 Presentation)
- B. Graham Project Trip Generation (3/14/16)



## **A. ADM Trip Generation 2/19/16**

**Table 6 (Revision): Trip Generation Summary for American Dream Miami**

Land Use	ITE Code	Size	Units	Trip Rates		Trips					
				Daily	PM Peak	Daily	PM Peak Hour				
							Total	In		Out	
Entertainment/Retail (GFA)	-	6,200	KSF	11.26	0.85	69,822	5,293	48%	2,541	52%	2,752
Total Generated Trips (pre-LRT adjustment)						69,822	5,293		2,541		2,752
PM Internal Capture =	0.0%					0	0		0		0
Net External Trips (pre-LRT adjustment)						69,822	5,293		2,541		2,752
LRT Adjustment =	10.8%	of net external trips				6,481	491		236		255
Net External Trips						76,303	5,784		2,777		3,007
Diverted Trips =	9.7%	of net external trips				5,995	454		200		254
New External Trips						70,308	5,330		2,577		2,753

Notes:

- Entertainment/Retail Trip Rates derived from Mall of America (MOA) external trip generation as provided in Table 5 per 1,000 ksf of Gross Floor Area (GFA). Two (2) independent counts report for MOA provided in Appendix F.
- LRT Adjustment = (Unadjusted Net External Trips)(10.8%)(2.3 MOA AVO / 3.0 Conservative FL Attraction AVO)
- Diverted trip reduction percentage reduced from 14% per ITE's Shopping Center Pass-by fitted rate to 9.7% based on fitted curve only using 3 highest ITE Shopping Center data points (all > 1 msf) plus data from two large Florida retail attractions (Florida Mall and Galleria Mall) provided in Appendix TBD
- Diverted trip reduction only applied to 81% of net external trips (those trips not associated with entertainment/other use) per Cambridge MOA survey provided in per Appendix G

**B. Graham Project Trip Generation 3/14/16**

TABLE 1A - THE GRAHAM COMPANIES - YEAR 2020 DEVELOPMENT PROGRAM TRIP GENERATION									
LAND USE	UNITS	ITE LUC	ITE 9TH EDITION	DAILY	% IN	TRIPS IN	% OUT	TRIPS OUT	
APARTMENTS	500 DU	220	$T = 6.06 (X) + 123.56$	3,154	50%	1,577	50%	1,577	
RETAIL	150,000 SQ. FT.	820	$\text{Ln}(T) = 0.65 \text{Ln}(X) + 5.83$	8,839	50%	4,420	50%	4,419	
BUSINESS PARK	250,000 SQ. FT.	770	$T = 10.62 (X) + 715.61$	3,371	50%	1,685	50%	1,686	
<b>GROSS DRIVEWAY TRIPS</b>				<b>15,363</b>	50%	<b>7,682</b>	50%	<b>7,681</b>	
INTERNALIZATION	See Note 1	15.97%	Internalization - See Table 1B	2,453	50%	1,227	50%	1,226	
DIVERTED TRIPS TO RETAIL USE	See Note 2	35.00%	$\text{Ln}(TP) = -0.29 \text{Ln}(X) + 5.00$	2,600	50%	1,300	50%	1,300	
<b>NET EXTERNAL TRIPS</b>				<b>10,310</b>	50%	<b>5,155</b>	50%	<b>5,155</b>	
LAND USE	UNITS	ITE LUC	ITE 9TH EDITION	AM TRIPS	% IN	TRIPS IN	% OUT	TRIPS OUT	
APARTMENTS	500 DU	220	$T = 0.49 (X) + 3.73$	249	20%	50	80%	199	
RETAIL	150,000 SQ. FT.	820	$\text{Ln}(T) = 0.61 \text{Ln}(X) + 2.24$	200	62%	124	38%	76	
BUSINESS PARK	250,000 SQ. FT.	770	$\text{Ln}(T) = 0.97 \text{Ln}(X) + 0.49$	346	85%	294	15%	52	
<b>GROSS DRIVEWAY TRIPS</b>				<b>795</b>	59%	<b>468</b>	41%	<b>327</b>	
INTERNALIZATION	See Note 1	8.40%	Internalization - See Table 1C	67	59%	39	41%	28	
DIVERTED TRIPS TO RETAIL USE	See Note 2	35.00%	$\text{Ln}(TP) = -0.29 \text{Ln}(X) + 5.00$	64	62%	40	38%	24	
<b>NET EXTERNAL TRIPS</b>				<b>664</b>	59%	<b>389</b>	41%	<b>275</b>	
LAND USE	UNITS	ITE LUC	ITE 9TH EDITION	PM TRIPS	% IN	TRIPS IN	% OUT	TRIPS OUT	
APARTMENTS	500 DU	220	$T = 0.55 (X) + 17.65$	293	65%	190	35%	103	
RETAIL	150,000 SQ. FT.	820	$\text{Ln}(T) = 0.67 \text{Ln}(X) + 3.31$	786	48%	377	52%	409	
BUSINESS PARK	250,000 SQ. FT.	770	$\text{Ln}(T) = 0.90 \text{Ln}(X) + 0.85$	337	26%	88	74%	249	
<b>GROSS DRIVEWAY TRIPS</b>				<b>1,416</b>	46%	<b>655</b>	54%	<b>761</b>	
INTERNALIZATION	See Note 1	24.38%	Internalization - See Table 1D	345	46%	159	54%	186	
DIVERTED TRIPS TO RETAIL USE	See Note 2	35.00%	$\text{Ln}(TP) = -0.29 \text{Ln}(X) + 5.00$	208	48%	100	52%	108	
<b>NET EXTERNAL TRIPS</b>				<b>863</b>	46%	<b>396</b>	54%	<b>467</b>	

Cathy Sweetapple & Associates

3/11/2016

**Note 1** - See attached Tables 1B, 1C and 1D for the Daily, AM Peak Hour and PM Peak Hour 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 while the updated AM and PM Peak Hour factors are found in Tables 6.1 and 6.2 from the ITE Trip Generation Handbook 3rd 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.



Analyst Sweetapple  
 Date 1/24/2016  
 Project CDMP No. 2  
 Timeframe Daily

TABLE 1B - DAILY INTERNALIZATION - THE GRAHAM COMPANIES - 2020  
 MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY

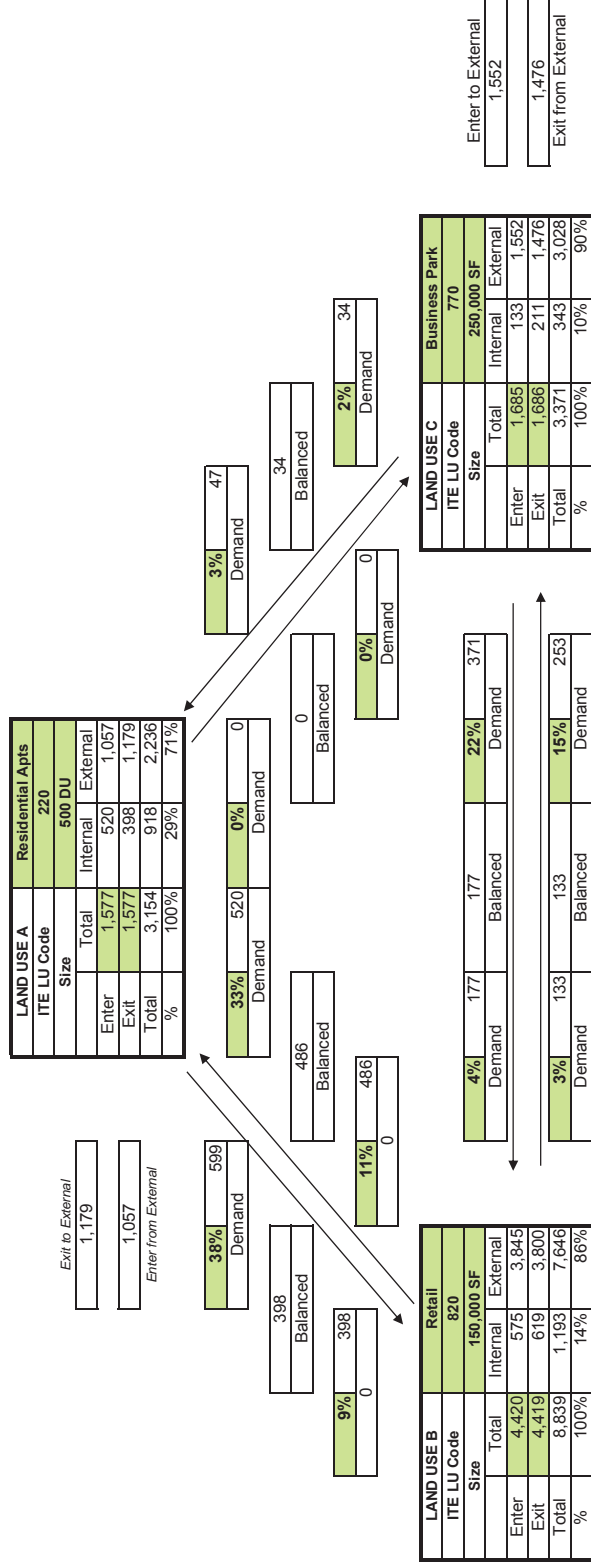


TABLE 1C - AM PEAK HOUR INTERNALIZATION - THE GRAHAM COMPANIES - 2020  
MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY

LAND USE A	Residential Apts	
ITE LU Code	220	
Size	500 DU	
	Total	Internal External
Enter	50	1 49
Exit	199	6 193
Total	249	7 242
%	100%	3% 97%

Exit to External

Enter from External

1%	2
Demand	

2
Balanced

17%	21
	0

14%	11
0	

1
Balanced

2%	1	2%	4
Demand		Demand	

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----

1

LAND USE B	Retail		
ITE LU Code	820		
Size	100,000 SF		
	Total	Internal	External
Enter	124	17	107
Exit	76	13	63
Total	200	29	171
%	100%	15%	85%

## Exit to External

Enter from External

28%	15	Demand
-----	----	--------

	4%	12	Demand
--	----	----	--------

LAND USE C	Business Park		
ITE LU Code	770		
Size	250,000 SF		
	Total	Internal	External
Enter	294	16	278
Exit	52	15	37
Total	346	30	316
%	100%	9%	91%

Enter to External

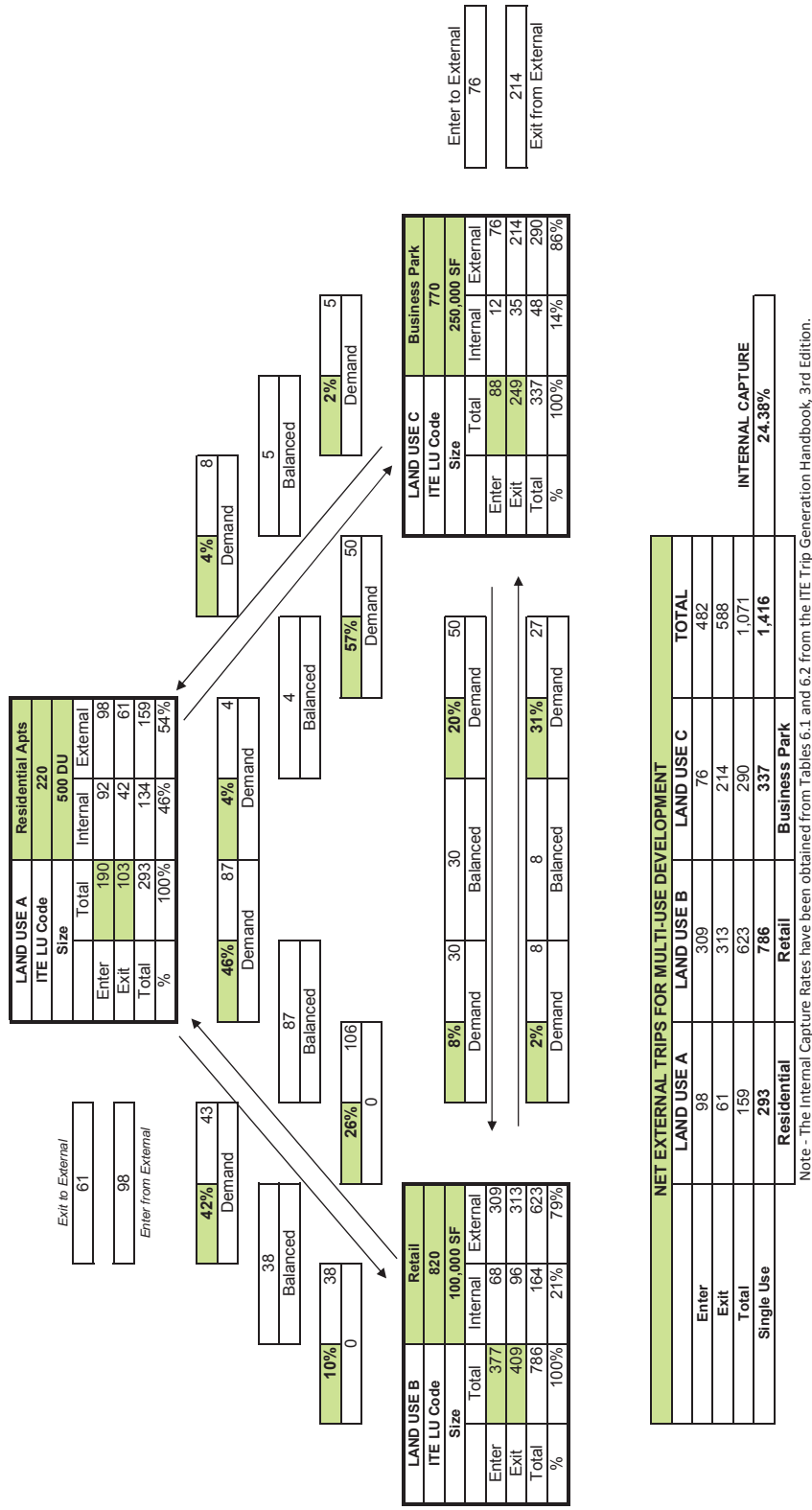
Exit from External

NET EXTERNAL TRIPS FOR MULTI-USE DEVELOPMENT				
	LAND USE A	LAND USE B	LAND USE C	TOTAL
Enter	49	107	278	435
Exit	193	63	37	294
<b>Total</b>	<b>242</b>	<b>171</b>	<b>316</b>	<b>728</b>
<b>Single Use</b>	<b>249</b>	<b>200</b>	<b>346</b>	<b>795</b>
	Residential	Retail	Business Park	

Note - The Internal Capture Rates have been obtained from Tables 6.1 and 6.2 from the ITE Trip Generation Handbook, 3rd Edition.

Analyst Sweetapple  
Date 1/24/2016  
Project CDM No. 2  
Timeframe PM Peak Hr

TABLE 1D - PM PEAK HOUR INTERNALIZATION - THE GRAHAM COMPANIES - 2020  
MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY







COUNTY : 87  
STATION: 2518  
DESCRIPTION: SR 860/MIAMI GARDENS DR, 800' W OF NW 87 AV  
START DATE: 06/17/2014  
START TIME: 0000

TIME	DIRECTION: E			DIRECTION: W			COMBINED TOTAL
	1ST	2ND	3RD	4TH	TOTAL	1ST 2ND 3RD 4TH TOTAL	
0000	83	83	62	54	282	40 39 28 32	139 421
0100	45	33	31	25	134	29 10 17 13	69 203
0200	22	20	16	17	75	7 13 14 13	47 122
0300	11	15	19	17	62	16 13 24 16	69 131
0400	11	11	15	22	59	20 32 36 57	145 204
0500	24	26	30	45	125	44 71 128 154	397 522
0600	44	54	72	99	269	162 239 406 435	1242 1511
0700	94	104	147	183	528	458 584 691 654	2387 2915
0800	204	189	207	244	844	571 535 563 519	2188 3032
0900	195	187	185	202	769	406 348 338 303	1395 2164
1000	206	186	156	190	738	255 271 258 252	1036 1774
1100	192	186	193	224	795	212 219 215 222	868 1663
1200	221	209	255	240	925	203 204 209 203	819 1744
1300	208	215	250	191	864	245 211 252 213	921 1785
1400	224	264	261	321	1070	217 228 226 219	890 1960
1500	269	302	340	365	1276	226 228 229 221	904 2180
1600	428	450	429	503	1810	195 220 228 224	867 2677
1700	600	639	631	678	2548	241 279 252 260	1032 3580
1800	630	640	544	481	2295	297 263 243 260	1063 3358
1900	468	427	373	350	1618	246 252 219 252	969 2587
2000	342	336	309	285	1272	213 185 207 186	791 2063
2100	291	286	322	270	1169	151 153 135 126	565 1734
2200	236	261	244	161	902	90 92 61 68	311 1213
2300	157	158	108	129	552	45 58 59 141	303 855

20981

24-HOUR TOTALS:

19417 40398

PEAK VOLUME INFORMATION

	DIRECTION: E		DIRECTION: W	
	HOURLY VOLUME	PERCENTAGE	HOURLY VOLUME	PERCENTAGE
A.M.	800	2.35	715	2.33
P.M.	1730	2.35	1715	2.33
DAILY	1730	2.35	1715	2.33

TRUCK PERCENTAGE 2.35

2.34

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	77	17526	2885	31	371	25	3	34	29	0	0	0	0	0	0	493	20981
W	56	16452	2456	32	315	27	0	41	38	0	0	0	0	0	0	453	19417

COUNTY : 87  
STATION: 2518  
DESCRIPTION: SR 860/MIAMI GARDENS DR, 800' W OF NW 87 AV  
START DATE: 06/18/2014  
START TIME: 0000

TIME	DIRECTION: E				TOTAL	DIRECTION: W				TOTAL	COMBINED TOTAL	
	1ST	2ND	3RD	4TH		1ST	2ND	3RD	4TH			
0000	83	91	61	65	300	96	63	51	42	252	552	
0100	50	40	39	33	162	25	26	27	20	98	260	
0200	26	18	31	20	95	16	13	19	22	70	165	
0300	7	31	22	11	71	8	17	15	24	64	135	
0400	9	15	16	16	56	20	25	40	56	141	197	
0500	21	18	47	38	124	46	66	128	146	386	510	
0600	52	55	76	97	280	156	223	403	435	1217	1497	
0700	107	139	138	195	579	460	599	653	617	2329	2908	
0800	204	216	203	257	880	541	558	586	483	2168	3048	
0900	229	181	176	200	786	430	386	343	324	1483	2269	
1000	173	186	189	205	753	262	274	242	241	1019	1772	
1100	196	200	241	253	890	231	247	234	218	930	1820	
1200	246	237	232	247	962	249	216	218	237	920	1882	
1300	238	221	252	234	945	240	228	258	264	990	1935	
1400	265	291	295	280	1131	221	167	205	186	779	1910	
1500	316	331	363	378	1388	189	182	212	201	784	2172	
1600	413	465	412	455	1745	225	257	249	233	964	2709	
1700	485	580	646	619	2330	251	266	279	274	1070	3400	
1800	601	561	559	510	2231	259	292	264	265	1080	3311	
1900	447	427	386	335	1595	235	215	217	220	887	2482	
2000	330	290	292	277	1189	198	201	166	157	722	1911	
2100	274	255	231	211	971	159	156	142	141	598	1569	
2200	197	245	212	159	813	126	115	103	120	464	1277	
2300	146	129	135	90	500	82	72	45	43	242	742	
24-HOUR TOTALS:					20776						19657	40433

DIRECTION: E				DIRECTION: W				COMBINED DIRECTIONS	
PEAK VOLUME INFORMATION		DIRECTION: E		DIRECTION: W		COMBINED DIRECTIONS		VOLUME	
		HOUR	VOLUME	HOUR	VOLUME	HOUR		VOLUME	
A.M.		815	905	715	2410	730		3122	
P.M.		1715	2446	1730	1104	1730		3531	
DAILY		1715	2446	715	2410	1730		3531	
TRUCK PERCENTAGE		2.47		2.04				2.26	

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	59	17354	2849	49	360	24	0	41	40	0	0	0	0	0	0	514	20776
W	43	16696	2517	29	287	12	0	33	40	0	0	0	0	0	0	401	19657

COUNTY : 87  
STATION: 2518  
DESCRIPTION: SR 860/MIAMI GARDENS DR, 800' W OF NW 87 AV  
START DATE: 06/19/2014  
START TIME: 0000

TIME	DIRECTION: E			DIRECTION: W			COMBINED TOTAL
	1ST	2ND	3RD	4TH	TOTAL	1ST 2ND 3RD 4TH TOTAL	
0000	83	93	75	45	296	48 39 41 22 150	446
0100	47	31	38	26	142	26 24 25 22 97	239
0200	27	28	19	11	85	14 20 13 13 60	145
0300	17	14	17	13	61	15 12 27 23 77	138
0400	23	15	19	17	74	17 26 28 53 124	198
0500	15	24	38	44	121	46 69 130 126 371	492
0600	48	61	71	85	265	162 246 380 421 1209	1474
0700	103	123	155	161	542	435 515 631 590 2171	2713
0800	186	208	207	250	851	541 577 565 504 2187	3038
0900	191	213	184	199	787	389 322 325 334 1370	2157
1000	192	168	200	198	758	275 271 250 226 1022	1780
1100	188	220	226	240	874	241 262 218 233 954	1828
1200	239	239	263	200	941	201 205 208 232 846	1787
1300	241	199	231	262	933	252 234 237 232 955	1888
1400	263	313	234	267	1077	194 210 234 227 865	1942
1500	304	340	356	434	1434	231 222 195 229 877	2311
1600	431	428	451	524	1834	216 208 224 249 897	2731
1700	579	658	687	661	2585	255 267 254 198 974	3559
1800	603	627	547	525	2302	242 238 237 202 919	3221
1900	496	407	399	389	1691	208 236 204 174 822	2513
2000	356	314	363	293	1326	181 151 163 139 634	1960
2100	287	317	277	267	1148	144 131 121 125 521	1669
2200	206	241	192	174	813	101 115 78 372 1185	1185
2300	168	142	117	89	516	73 59 45 58 235	751
24-HOUR TOTALS:				21456			18709 40165

PEAK VOLUME INFORMATION			
DIRECTION: E		DIRECTION: W	
HOUR	VOLUME	HOUR	VOLUME
A.M. 830	861	730	3049
P.M. 1715	2609	1715	3570
DAILY 1715	2609	1715	3570
TRUCK PERCENTAGE	2.41	2.04	2.24

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	99	17855	2984	36	370	27	0	46	39	0	0	0	0	0	0	518	21456
W	21	15889	2418	36	253	17	0	45	30	0	0	0	0	0	0	381	18709

COUNTY : 87  
STATION: 7048  
DESCRIPTION: NW 138TH ST 0.5 MILE WEST OF 36TH AVE/97TH AVE  
START DATE: 10/22/2014  
START TIME: 0000

TIME	DIRECTION: E				TOTAL	DIRECTION: W				TOTAL	COMBINED TOTAL
	1ST	2ND	3RD	4TH		1ST	2ND	3RD	4TH		
0000	26	19	25	18	88	7	13	8	8	36	124
0100	15	10	14	13	52	7	8	7	6	28	80
0200	18	11	7	5	41	4	12	8	13	37	78
0300	12	21	13	7	53	14	20	17	27	78	131
0400	23	22	13	15	73	29	35	51	69	184	257
0500	22	24	43	44	133	66	86	101	142	395	528
0600	70	85	88	146	389	84	146	174	209	613	1002
0700	109	120	158	161	548	222	267	240	254	983	1531
0800	170	176	181	159	686	251	240	259	282	1032	1718
0900	142	137	116	136	531	237	169	147	148	701	1232
1000	134	124	120	109	487	155	105	117	117	494	981
1100	107	137	113	119	476	135	136	127	129	527	1003
1200	154	139	138	121	552	116	143	128	129	516	1068
1300	142	120	127	125	514	127	118	139	129	513	1027
1400	149	135	148	136	568	138	140	145	155	578	1146
1500	160	164	171	161	656	149	149	209	203	710	1366
1600	189	200	229	231	849	175	175	191	194	735	1584
1700	290	217	247	201	955	171	230	163	156	720	1675
1800	195	220	185	156	756	162	183	129	151	625	1381
1900	135	147	102	77	461	114	113	94	82	403	864
2000	81	77	63	57	278	78	81	48	49	256	534
2100	78	69	36	46	229	63	39	43	36	181	410
2200	56	36	55	27	174	31	28	31	36	126	300
2300	44	25	25	26	120	25	18	15	13	71	191
24-HOUR TOTALS:					9669	10542					20211

PEAK VOLUME INFORMATION					
DIRECTION: E			DIRECTION: W		
HOUR	VOLUME		HOUR	VOLUME	
A.M.	745	688		800	1032
P.M.	1645	985		1630	786
DAILY	1645	985		800	1032
TRUCK PERCENTAGE	22.36			20.86	21.58

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	40	5893	1529	100	1011	292	235	170	334	9	3	5	3	0	45	2162	9669
W	305	5691	2314	175	854	549	86	169	337	23	0	3	3	0	33	2199	10542



COUNTY: 87

STATION: 7048

DESCRIPTION: NW 138TH ST 0.5 MILE WEST OF 36TH AVE/97TH AVE

START DATE: 10/23/2014

START TIME: 0000

TIME	DIRECTION: E				TOTAL	DIRECTION: W				TOTAL	COMBINED TOTAL	
	1ST	2ND	3RD	4TH		1ST	2ND	3RD	4TH			
0000	23	21	8	11	63	8	11	5	12	36	99	
0100	12	12	11	21	56	11	14	15	10	50	106	
0200	12	6	12	4	34	13	8	10	10	41	75	
0300	12	12	14	4	42	15	26	21	31	93	135	
0400	18	24	20	21	83	23	32	54	66	175	258	
0500	16	22	35	37	110	56	72	91	113	332	442	
0600	85	111	99	120	415	99	135	155	182	571	986	
0700	121	145	145	149	560	169	228	226	268	891	1451	
0800	150	141	159	142	592	182	190	220	190	782	1374	
0900	137	152	143	117	549	175	172	142	146	635	1184	
1000	138	113	118	118	487	163	138	147	133	581	1068	
1100	103	100	116	145	464	122	131	120	139	512	976	
1200	160	143	109	115	527	139	112	122	151	524	1051	
1300	147	138	131	125	541	148	150	167	141	606	1147	
1400	147	155	168	126	596	148	146	156	169	619	1215	
1500	154	165	174	159	652	160	164	157	185	666	1318	
1600	219	192	217	225	853	181	210	197	193	781	1634	
1700	272	305	271	233	1081	192	218	190	170	770	1851	
1800	206	192	157	173	728	184	177	141	115	617	1345	
1900	124	120	100	89	433	96	109	100	69	374	807	
2000	86	74	71	101	332	71	69	49	43	232	564	
2100	74	58	59	57	248	48	47	51	31	177	425	
2200	68	62	54	44	228	36	28	26	27	117	345	
2300	57	36	24	21	138	18	15	11	8	52	190	
24-HOUR TOTALS:					9812						10234	20046

PEAK VOLUME INFORMATION									
DIRECTION: E					DIRECTION: W				
TRUCK	PERCENTAGE	23.17			23.14			23.15	
A.M.	745	599			715			715	1493
P.M.	1700	1081			1630			1645	1866
DAILY	1700	1081			715			1645	1866

CLASSIFICATION SUMMARY DATABASE																	
DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	54	5870	1569	125	954	299	332	182	354	16	1	4	6	0	46	2273	9812
W	294	5335	2215	176	877	679	103	175	337	18	1	1	1	0	22	2368	10234

TABLE 2A - THE GRAHAM COMPANIES - YEAR 2040 DEVELOPMENT PROGRAM TRIP GENERATION									
LAND USE	UNITS	ITE LUC	ITE 9TH EDITION	DAILY	% IN	TRIPS IN	% OUT	TRIPS OUT	
APARTMENTS	2,000 DU	220	$T = 6.06 (X) + 123.56$	12,244	50%	6,122	50%	6,122	
RETAIL	1,000,000 SQ. FT.	820	$\ln (T) = 0.65 \ln (X) + 5.83$	30,334	50%	15,167	50%	15,167	
BUSINESS PARK	3,000,000 SQ. FT.	770	$T = 10.62 (X) + 715.61$	32,576	50%	16,288	50%	16,288	
<b>GROSS DRIVEWAY TRIPS</b>				<b>75,153</b>	50%	<b>37,577</b>	50%	<b>37,576</b>	
INTERNALIZATION	See Note 1	11.39%	Internalization - See Table 2B	8,560	50%	4,280	50%	4,280	
DIVERTED TRIPS TO RETAIL USE	See Note 2	20.00%	$\ln (TP) = -0.29 \ln (X) + 5.00$	5,376	50%	2,688	50%	2,688	
<b>NET EXTERNAL TRIPS</b>				<b>61,217</b>	50%	<b>30,609</b>	50%	<b>30,608</b>	
LAND USE	UNITS	ITE LUC	ITE 9TH EDITION	AM TRIPS	% IN	TRIPS IN	% OUT	TRIPS OUT	
APARTMENTS	2,000 DU	220	$T = 0.49 (X) + 3.73$	984	20%	197	80%	787	
RETAIL	1,000,000 SQ. FT.	820	$\ln (T) = 0.61 \ln (X) + 2.24$	635	62%	394	38%	241	
BUSINESS PARK	3,000,000 SQ. FT.	770	$\ln (T) = 0.97 \ln (X) + 0.49$	3,851	85%	3,273	15%	578	
<b>GROSS DRIVEWAY TRIPS</b>				<b>5,470</b>	71%	<b>3,864</b>	29%	<b>1,606</b>	
INTERNALIZATION	See Note 1	8.17%	Internalization - See Table 2C	447	71%	317	29%	130	
DIVERTED TRIPS TO RETAIL USE	See Note 2	20.00%	$\ln (TP) = -0.29 \ln (X) + 5.00$	117	62%	72	38%	45	
<b>NET EXTERNAL TRIPS</b>				<b>4,906</b>	71%	<b>3,475</b>	29%	<b>1,431</b>	
LAND USE	UNITS	ITE LUC	ITE 9TH EDITION	PM TRIPS	% IN	TRIPS IN	% OUT	TRIPS OUT	
APARTMENTS	2,000 DU	220	$T = 0.55 (X) + 17.65$	1,118	65%	726	35%	392	
RETAIL	1,000,000 SQ. FT.	820	$\ln (T) = 0.67 \ln (X) + 3.31$	2,802	48%	1,345	52%	1,457	
BUSINESS PARK	3,000,000 SQ. FT.	770	$\ln (T) = 0.90 \ln (X) + 0.85$	3,152	26%	820	74%	2,332	
<b>GROSS DRIVEWAY TRIPS</b>				<b>7,072</b>	41%	<b>2,891</b>	59%	<b>4,181</b>	
INTERNALIZATION	See Note 1	18.38%	Internalization - See Table 2D	1,300	41%	533	59%	767	
DIVERTED TRIPS TO RETAIL USE	See Note 2	20.00%	$\ln (TP) = -0.29 \ln (X) + 5.00$	457	48%	220	52%	237	
<b>NET EXTERNAL TRIPS</b>				<b>5,315</b>	40%	<b>2,138</b>	60%	<b>3,177</b>	

Cathy Sweetapple & Associates

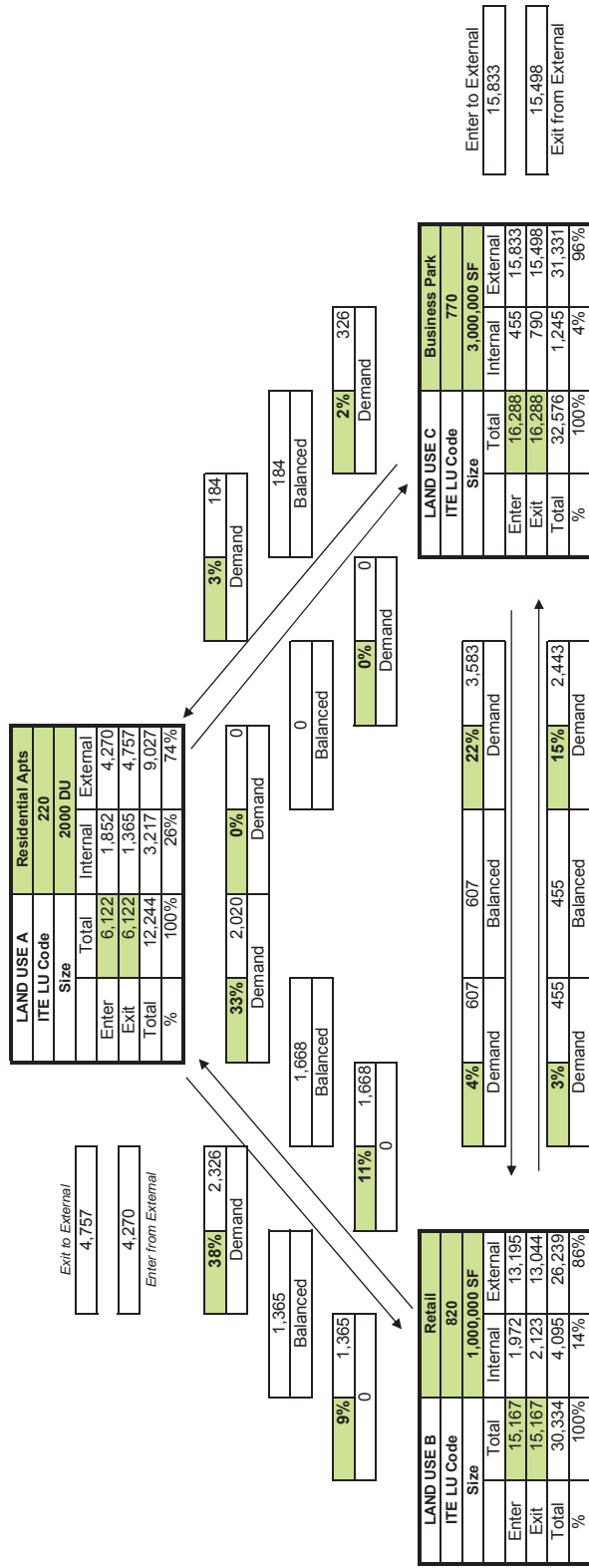
3/11/2016

**Note 1** - See attached Tables 2B, 2C and 2D for the Daily, AM Peak Hour and PM Peak Hour 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 while the updated AM and PM Peak Hour factors are found in Tables 6.1 and 6.2 from the ITE Trip Generation Handbook 3rd Edition.

**Note 2** - Diverted Trips to Retail Use for the Year 2040 proposed development program is Limited to 20% 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 2E for the calculations to show compliance with the 10% threshold.

Analyst Sweetapple  
 Date 1/25/2016  
 Project CDMP No. 2  
 Timeframe Daily

TABLE 2B - DAILY INTERNALIZATION - THE GRAHAM COMPANIES - 2040  
 MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY



NET EXTERNAL TRIPS FOR MULTI-USE DEVELOPMENT			
	LAND USE A	LAND USE B	LAND USE C
Enter	4,270	13,195	15,833
Exit	4,757	13,044	15,498
Total	9,027	26,239	31,331
Single Use	12,244	30,334	32,576
Retail			
Business Park			
TOTAL			
INTERNAL CAPTURE			
11.39%			

Note - The Internal Capture Rates have been obtained from Tables 7.1 and 7.2 from the ITE Trip Generation Handbook, 2nd Edition.



Analyst Sweetapple  
Date 1/25/2016  
Project CDMP No. 2  
Timeframe PM Peak Hr

TABLE 2D - PM PEAK HOUR INTERNALIZATION - THE GRAHAM COMPANIES - 2040  
MULTI-USE DEVELOPMENT TRIP GENERATION AND INTERNAL CAPTURE SUMMARY







COUNTY : 87  
STATION: 2518  
DESCRIPTION: SR 860/MIAMI GARDENS DR, 800' W OF NW 87 AV  
START DATE: 06/17/2014  
START TIME: 0000

TIME	DIRECTION: E			DIRECTION: W			COMBINED TOTAL
	1ST	2ND	3RD	4TH	TOTAL	1ST 2ND 3RD 4TH TOTAL	
0000	83	83	62	54	282	40 39 28 32	139 421
0100	45	33	31	25	134	29 10 17 13	69 203
0200	22	20	16	17	75	7 13 14 13	47 122
0300	11	15	19	17	62	16 13 24 16	69 131
0400	11	11	15	22	59	20 32 36 57	145 204
0500	24	26	30	45	125	44 71 128 154	397 522
0600	44	54	72	99	269	162 239 406 435	1242 1511
0700	94	104	147	183	528	458 584 691 654	2387 2915
0800	204	189	207	244	844	571 535 563 519	2188 3032
0900	195	187	185	202	769	406 348 338 303	1395 2164
1000	206	186	156	190	738	255 271 258 252	1036 1774
1100	192	186	193	224	795	212 219 215 222	868 1663
1200	221	209	255	240	925	203 204 209 203	819 1744
1300	208	215	250	191	864	245 211 252 213	921 1785
1400	224	264	261	321	1070	217 228 226 219	890 1960
1500	269	302	340	365	1276	226 228 229 221	904 2180
1600	428	450	429	503	1810	195 220 228 224	867 2677
1700	600	639	631	678	2548	241 279 252 260	1032 3580
1800	630	640	544	481	2295	297 263 243 260	1063 3358
1900	468	427	373	350	1618	246 252 219 252	969 2587
2000	342	336	309	285	1272	213 185 207 186	791 2063
2100	291	286	322	270	1169	151 153 135 126	565 1734
2200	236	261	244	161	902	90 92 61 68	311 1213
2300	157	158	108	129	552	45 58 59 141	303 855

20981

24-HOUR TOTALS:

19417 40398

PEAK VOLUME INFORMATION

	DIRECTION: E			DIRECTION: W			COMBINED DIRECTIONS		
	HOUR	VOLUME		HOUR	VOLUME		HOUR	VOLUME	
A.M.	800	844		715	2500		730	3174	
P.M.	1730	2579		1715	1088		1715	3666	
DAILY	1730	2579		715	2500		1715	3666	

TRUCK PERCENTAGE 2.35

2.33

2.34

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	77	17526	2885	31	371	25	3	34	29	0	0	0	0	0	0	493	20981
W	56	16452	2456	32	315	27	0	41	38	0	0	0	0	0	0	453	19417

COUNTY : 87  
STATION: 2518  
DESCRIPTION: SR 860/MIAMI GARDENS DR, 800' W OF NW 87 AV  
START DATE: 06/18/2014  
START TIME: 0000

TIME	DIRECTION: E				TOTAL	DIRECTION: W				TOTAL	COMBINED TOTAL	
	1ST	2ND	3RD	4TH		1ST	2ND	3RD	4TH			
0000	83	91	61	65	300	96	63	51	42	252	552	
0100	50	40	39	33	162	25	26	27	20	98	260	
0200	26	18	31	20	95	16	13	19	22	70	165	
0300	7	31	22	11	71	8	17	15	24	64	135	
0400	9	15	16	16	56	20	25	40	56	141	197	
0500	21	18	47	38	124	46	66	128	146	386	510	
0600	52	55	76	97	280	156	223	403	435	1217	1497	
0700	107	139	138	195	579	460	599	653	617	2329	2908	
0800	204	216	203	257	880	541	558	586	483	2168	3048	
0900	229	181	176	200	786	430	386	343	324	1483	2269	
1000	173	186	189	205	753	262	274	242	241	1019	1772	
1100	196	200	241	253	890	231	247	234	218	930	1820	
1200	246	237	232	247	962	249	216	218	237	920	1882	
1300	238	221	252	234	945	240	228	258	264	990	1935	
1400	265	291	295	280	1131	221	167	205	186	779	1910	
1500	316	331	363	378	1388	189	182	212	201	784	2172	
1600	413	465	412	455	1745	225	257	249	233	964	2709	
1700	485	580	646	619	2330	251	266	279	274	1070	3400	
1800	601	561	559	510	2231	259	292	264	265	1080	3311	
1900	447	427	386	335	1595	235	215	217	220	887	2482	
2000	330	290	292	277	1189	198	201	166	157	722	1911	
2100	274	255	231	211	971	159	156	142	141	598	1569	
2200	197	245	212	159	813	126	115	103	120	464	1277	
2300	146	129	135	90	500	82	72	45	43	242	742	
24-HOUR TOTALS:					20776						19657	40433

DIRECTION: E				DIRECTION: W				COMBINED DIRECTIONS	
PEAK VOLUME	PEAK VOLUME	PEAK VOLUME	PEAK VOLUME	PEAK VOLUME	PEAK VOLUME	PEAK VOLUME	PEAK VOLUME	PEAK VOLUME	PEAK VOLUME
A.M.	815	905	905	715	2410	2410	2410	730	3122
P.M.	1715	2446	2446	1730	1104	1104	1104	1730	3531
DAILY	1715	2446	2446	715	2410	2410	2410	1730	3531
TRUCK PERCENTAGE	2.47			2.04					2.26

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	59	17354	2849	49	360	24	0	41	40	0	0	0	0	0	0	514	20776
W	43	16696	2517	29	287	12	0	33	40	0	0	0	0	0	0	401	19657

COUNTY : 87  
STATION: 2518  
DESCRIPTION: SR 860/MIAMI GARDENS DR, 800' W OF NW 87 AV  
START DATE: 06/19/2014  
START TIME: 0000

TIME	DIRECTION: E			DIRECTION: W			COMBINED TOTAL
	1ST	2ND	3RD	4TH	TOTAL	1ST 2ND 3RD 4TH TOTAL	
0000	83	93	75	45	296	48 39 41 22 150	446
0100	47	31	38	26	142	26 24 25 22 97	239
0200	27	28	19	11	85	14 20 13 13 60	145
0300	17	14	17	13	61	15 12 27 23 77	138
0400	23	15	19	17	74	17 26 28 53 124	198
0500	15	24	38	44	121	46 69 130 126 371	492
0600	48	61	71	85	265	162 246 380 421 1209	1474
0700	103	123	155	161	542	435 515 631 590 2171	2713
0800	186	208	207	250	851	541 577 565 504 2187	3038
0900	191	213	184	199	787	389 322 325 334 1370	2157
1000	192	168	200	198	758	275 271 250 226 1022	1780
1100	188	220	226	240	874	241 262 218 233 954	1828
1200	239	239	263	200	941	201 205 208 232 846	1787
1300	241	199	231	262	933	252 234 237 232 955	1888
1400	263	313	234	267	1077	194 210 234 227 865	1942
1500	304	340	356	434	1434	231 222 195 229 877	2311
1600	431	428	451	524	1834	216 208 224 249 897	2731
1700	579	658	687	661	2585	255 267 254 198 974	3559
1800	603	627	547	525	2302	242 238 237 202 919	3221
1900	496	407	399	389	1691	208 236 204 174 822	2513
2000	356	314	363	293	1326	181 151 163 139 634	1960
2100	287	317	277	267	1148	144 131 121 125 521	1669
2200	206	241	192	174	813	101 115 78 372 1185	1185
2300	168	142	117	89	516	73 59 45 58 235	751
24-HOUR TOTALS:				21456			18709 40165

PEAK VOLUME INFORMATION			
DIRECTION: E		DIRECTION: W	
HOUR	VOLUME	HOUR	VOLUME
A.M. 830	861	730	3049
P.M. 1715	2609	1715	3570
DAILY 1715	2609	1715	3570
TRUCK PERCENTAGE	2.41		2.24

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	99	17855	2984	36	370	27	0	46	39	0	0	0	0	0	0	518	21456
W	21	15889	2418	36	253	17	0	45	30	0	0	0	0	0	0	381	18709

DESCRIPTION: NW 138TH ST 0.5 MILE WEST OF 36TH AVE/97TH AVE  
START DATE: 10/22/2014  
START TIME: 0000

TIME	DIRECTION: E				TOTAL	DIRECTION: W				TOTAL	COMBINED TOTAL
	1ST	2ND	3RD	4TH		1ST	2ND	3RD	4TH		
0000	26	19	25	18	88	7	13	8	8	36	124
0100	15	10	14	13	52	7	8	7	6	28	80
0200	18	11	7	5	41	4	12	8	13	37	78
0300	12	21	13	7	53	14	20	17	27	78	131
0400	23	22	13	15	73	29	35	51	69	184	257
0500	22	24	43	44	133	66	86	101	142	395	528
0600	70	85	88	146	389	84	146	174	209	613	1002
0700	109	120	158	161	548	222	267	240	254	983	1531
0800	170	176	181	159	686	251	240	259	282	1032	1718
0900	142	137	116	136	531	237	169	147	148	701	1232
1000	134	124	120	109	487	155	105	117	117	494	981
1100	107	137	113	119	476	135	136	127	129	527	1003
1200	154	139	138	121	552	116	143	128	129	516	1068
1300	142	120	127	125	514	127	118	139	129	513	1027
1400	149	135	148	136	568	138	140	145	155	578	1146
1500	160	164	171	161	656	149	149	209	203	710	1366
1600	189	200	229	231	849	175	175	191	194	735	1584
1700	290	217	247	201	955	171	230	163	156	720	1675
1800	195	220	185	156	756	162	183	129	151	625	1381
1900	135	147	102	77	461	114	113	94	82	403	864
2000	81	77	63	57	278	78	81	48	49	256	534
2100	78	69	36	46	229	63	39	43	36	181	410
2200	56	36	55	27	174	31	28	31	36	126	300
2300	44	25	25	26	120	25	18	15	13	71	191
24-HOUR TOTALS:					9669					10542	20211

		PEAK VOLUME INFORMATION					
		DIRECTION: E		DIRECTION: W		COMBINED DIRECTIONS	
		hour	volume	hour	volume	hour	volume
A.M.		745	688	800	1032	800	1718
P.M.		1645	985	1630	786	1630	1753
DAILY		1645	985	800	1032	1630	1753
TRUCK PERCENTAGE		22.36		20.86		21.58	

CLASSIFICATION SUMMARY DATABASE																	
DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	40	5893	1529	100	1011	292	235	170	334	9	3	5	3	0	45	2162	9669
W	305	5691	2314	175	854	549	86	169	337	23	0	3	3	0	33	2199	10542



COUNTY : 87  
STATION: 7048  
DESCRIPTION: NW 138TH ST 0.5 MILE WEST OF 36TH AVE/97TH AVE  
START DATE: 10/23/2014  
START TIME: 0000

TIME	DIRECTION: E				TOTAL	DIRECTION: W				TOTAL	COMBINED TOTAL
	1ST	2ND	3RD	4TH		1ST	2ND	3RD	4TH		
0000	23	21	8	11	63	8	11	5	12	36	99
0100	12	12	11	21	56	11	14	15	10	50	106
0200	12	6	12	4	34	13	8	10	10	41	75
0300	12	12	14	4	42	15	26	21	31	93	135
0400	18	24	20	21	83	23	32	54	66	175	258
0500	16	22	35	37	110	56	72	91	113	332	442
0600	85	111	99	120	415	99	135	155	182	571	986
0700	121	145	145	149	560	169	228	226	268	891	1451
0800	150	141	159	142	592	182	190	220	190	782	1374
0900	137	152	143	117	549	175	172	142	146	635	1184
1000	138	113	118	118	487	163	138	147	133	581	1068
1100	103	100	116	145	464	122	131	120	139	512	976
1200	160	143	109	115	527	139	112	122	151	524	1051
1300	147	138	131	125	541	148	150	167	141	606	1147
1400	147	155	168	126	596	148	146	156	169	619	1215
1500	154	165	174	159	652	160	164	157	185	666	1318
1600	219	192	217	225	853	181	210	197	193	781	1634
1700	272	305	271	233	1081	192	218	190	170	770	1851
1800	206	192	157	173	728	184	177	141	115	617	1345
1900	124	120	100	89	433	96	109	100	69	374	807
2000	86	74	71	101	332	71	69	49	43	232	564
2100	74	58	59	57	248	48	47	51	31	177	425
2200	68	62	54	44	228	36	28	26	27	117	345
2300	57	36	24	21	138	18	15	11	8	52	190
24-HOUR TOTALS:					9812	10234					20046

PEAK VOLUME INFORMATION			
DIRECTION: E		DIRECTION: W	
HOUR	VOLUME	HOUR	VOLUME
A.M.	745	715	904
P.M.	1700	1630	800
DAILY	1700	715	904

TRUCK PERCENTAGE 23.17 23.14 23.15

CLASSIFICATION SUMMARY DATABASE

DIR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	TOTTRK	TOTVOL
E	54	5870	1569	125	954	299	332	182	354	16	1	4	6	0	46	2273	9812
W	294	5335	2215	176	877	679	103	175	337	18	1	1	1	0	22	2368	10234



*Florida Department of Transportation*

RICK SCOTT  
GOVERNOR

1000 NW 111 Avenue  
Miami, FL 33172

JIM BOXOLD  
SECRETARY

March 24, 2016

Napoleon Somoza, Supervisor  
Miami-Dade County Department of Regulatory and Economic Resources Planning  
111 NW 1<sup>st</sup> Street, Suite 1220  
Miami, FL 33128-1972

**Subject: American Dream Miami Trip Generation for  
Comprehensive Development Master Plan (CDMP) Amendment**

Dear Mr. Somoza:

The Florida Department of Transportation, District Six, in cooperation with District Four, completed a joint review of the resubmitted trip generation analysis and Technical Memorandum for American Dream Miami (ADM) and Graham Project, which was dated March 14, 2016. The technical memorandum includes responses to comments concerning the trip generation analysis for the development projects presented in December 2015.

Based on the joint District Four and Six review of the Technical Memorandum dated March 14, 2016, the Applicant has satisfactorily addressed all comments concerning the trip generation analysis.

Please contact me at 305-470-5386, or Lisa Dykstra at 954-777-4360, if you have any questions concerning our comments.

Sincerely,

  
Lisa Colmenares, AICP  
Planning Manager

Napoleon Somoza

March 24, 2016

Page 2

cc: Harold Desdunes, Florida Department of Transportation, District Six  
Stacie Miller, Florida Department of Transportation, District Four  
Steve Braun, Florida Department of Transportation, District Four  
Carl Filer, Florida Department of Transportation, District Six  
Lisa Dykstra, Florida Department of Transportation, District Four  
Isabel Cosio-Caraballo, South Florida Regional Council

**APPENDIX I-A13:**  
**ADM Graham TIA RAI 1 Set\_LCE Comment Response\_06 22 2016**

**AMERICAN DREAM MIAMI & GRAHAM PROJECT  
Transportation Impact Analysis (TIA)  
For Comprehensive Development Master Plan (CDMP) Amendment  
Miami-Dade County, Florida**

**COMMENT SET & RESPONSES  
June 22, 2016**

**Introduction to CDMP TIA Comment Responses**

Attached are the responses to comments received from seven (7) reviewing agencies and interested parties on the Traffic Impact Analysis for the CDMP amendment, with FDOT Districts 4 and 6 submitting a joint set of comments. In summary, comments were received from Miami-Dade County Department of Regulatory and Economic Resources, Miami-Dade County Transit, Broward County Planning and Development Management Division, Florida Districts 4 and 6, Town of Miami Lakes, and City of Miramar. The comments and responses were numerous while many pertained to the same topic.

As we respond to the December 22, 2015 CDMP TIA submittal comments and responses, it is helpful to keep in mind all the traffic studies that were yet to be performed and have since been completed. For example, aside from the CDMP traffic study, an additional traffic study was prepared for to meet the Miami-Dade County Zoning requirements. The Zoning analysis generally follows the requirements for the Response to Question-21 of a Development of Regional Impact (DRI). Both the CDMP and the Zoning analyses follow many of the same guidelines, including establishing roadway link existing conditions and background traffic, trip distribution, and total project impacts. The main differences between the two studies is that the Zoning Analysis is limited to three years of committed roadway projects and it also include intersection analyses and evaluations. The updated analysis also includes information pertaining to the Concurrency response, a review of Weekend traffic conditions compared to Weekday conditions, Air Quality determination (DRI Question 22), bridge model run comparisons for NW170th Street and NW154th Street, and preliminary traffic impact fee analyses for the two Projects. Some of these additional analyses are included as appendices to the updated Main Document.

In addition to these traffic studies, the interchanges themselves must undergo State and Federal studies including but not limited to; Reevaluations of the interchange analysis included in the I-75 PD&E, Interchange Access Requests (IAR), and Turnpike Interchange Justification Reports (TIJR). All these studies will be reviewed and coordinated by the FDOT and FHWA, and are very comprehensive with detailed State and Federal guidelines. The freeway analyses are prepared separately from the updated document submitted at this time.

With the expansion of the updated CDMP TIA to address also the Zoning and the Concurrency requirements, along with other mentioned supporting studies, the team is hopeful that we have addressed all significant items pertaining to the CDMP per the comments contained herein. We are available to address any follow-up comments that any agency has in regards to the revised CDMP study and other submitted studies and supporting information.



**Miami-Dade County Department of Regulatory and Economic Resources and  
Department of Transportation and Public Works – January 22, 2016**

**Page 1, Section 1.0 Introduction**

Figure 1 Map, Project Location and Existing Roadways

- Map must show all roadway improvements proposed for each of these two projects, such as NW 102 Avenue as indicated on Figure 2 Map.

*LC: Based on other comments received, the Figure titled Location and Existing Roadways has been modified to just show the existing roadway network. The ADM and Graham project boundaries are also added for illustrative purposes. Future roadway improvements such as NW 102 Avenue are addressed elsewhere in the document.*

- Some existing interchange locations are incorrect. For example, the interchanges at the HEFT and NW 67 Avenue and at I-75 and NW 87 Avenue do not exist. The interchange at I-75 and NW 87 is a planned future improvement. Please revise map accordingly.

*LC: The figure has been updated to reflect only existing interchanges. Also see comment above.*

Figure 2 Map, Preliminary Access Plan

- Show all the planned roadway improvements proposed within the application site for the Graham project, such as NW 102 Avenue.

*LC: The figure has been updated to include the proposed NW 102th Avenue, along with the NW 107th Avenue roadway also requested by the County.*

**Page 5, Section 2.0 Analysis Years**

- Provide Concurrency Analyses for each application including identifying the traffic count station for each roadway segment analyzed, and for the combined applications as requested in the *Instructions For Applications Requesting Amendments to the Miami-Dade County Comprehensive Development Master Plan May 2015-16 Amendment Cycle*.

*LC: Concurrency analyses have been added to the revised CDMP and Zoning analyses report as requested. The information is consistent with the latest vested project trip information provided by the Miami-Dade County Department of Regulatory and Economic Resources as of April 2016 and includes both FDOT and County traffic count stations. The vested trips are included in the Background Summary table presented in Table I-15 and includes reference to the individual traffic count stations referenced for the vested trips.*

### **Page 5, Section 3.0 Study Area**

Figure 3, ADM and Graham 2020 Study Area and Figure 4, ADM and Graham 2040 Study Area Maps

- Clarify the information regarding the ADM Study Area Roadway and Graham Study Area Roadway.

*LC: The referenced figures have been revised to include the overall year 2020 and year 2040 study areas associated with the combined impacts of the ADM and Graham Project as requested by review agencies. Also included are the individual ADM and Graham study area roadway significant links. Notably, three separate figures are shown; namely one for the Year 2020 CDMP and Zoning analyses, one for the Year 2040 CDMP and one for the year 2040 Zoning.*

### **Page 8, Section 4.0 Existing Conditions (Year 2015)**

Figure 5, FDOT and County Stations

- Provide analyses in Table 1 and Appendix C for all FDOT and County traffic count stations shown on Figure 5.

*LC: As previously noted, the traffic study area has been revised to reflect all significant roadway links based on the combined ADM and Graham project trips for both the years 2020 and 2040 CDMP and Zoning analyses. The Count Station map has been updated to show only those traffic count locations utilized for the analyses.*

Table 1, Existing (Year 2015) Study Area Roadway Segments LOS Analysis.

- Identify the traffic count station for each roadway segment analyzed.

*LC: The traffic count stations have been added to the Existing (2015) Study Area Roadway Segment LOS Analysis table and the Background Summary table presented in Table I-15.*

- Maximum service volumes for State roadways should be determined using FDOT's Generalized Table and the County's adopted LOS standards. Maximum service volumes for County roadways must be calculated using ARTPLAN and the County's adopted LOS standards.

*LC: The Maximum Service Volumes are reflective of the referenced criteria for determining the capacities to be used for the revised CDMP (as well as the other traffic analyses contained in the updated document). The capacities have been based on FDOT's Generalized Tables and coordinated to ensure they do not exceed the County's MSVs referenced in the County's Vested Trips database with updates as needed. This includes Miami Gardens Drive which has been updated to be consistent with the County's adopted MSV. The County's adopted LOS standards are also used throughout.*

- Peak Hour Period volumes (PHP) are calculated using the average of the two highest consecutive hours, when 24-hour traffic counts are available. If 24-hour traffic counts are not available, then use the K factor. See *Instructions For Applications Requesting Amendments to the Miami-Dade County Comprehensive Development Master Plan May 2015-16 Amendment Cycle*).

*LC: All link analyses tables have been updated to reflect the above mentioned guidelines. The procedure for achieving the requested existing PHP volumes are described in the report, along with supporting tables with existing and future PHPs.*

- For the Existing analysis, use the actual hourly traffic counts available from FDOT and the County. For the 2020 and 2040 analyses, the growth factors must be applied to the hourly volumes.

*LC: The existing FDOT and County counts have been established for all analyzed roadway links and hourly and 15-minute traffic volumes applied were available. Again, the updated Count Location figure shows which counts were utilized. The PHP volumes derived for the various scenarios and analyses are detailed in the report. A review of the development of PHP volumes for the AM and PM existing and future traffic conditions, by peak and off-peak direction (NB/EB and SB/WB), is detailed. The future PHP background volume development, without neither the ADM nor the Graham Project included, are based on percent growth factors applied directly to the PHP volumes as requested. The process for preparing the growth is identified in the updated report along with supporting tables.*

## **Page 11, Section 5.0 Trip Generation**

- Use of the ITE Land Use code 820 for the pass-by trips does not seem to be appropriate because of the unique nature of this proposed development.

*LC: Both the ADM and Graham Project Trip Generations were revised and finalized between the time of the December 2015 CDMP TIA submittal and the submittal of the updated and expanded report. The Trip Generation for the ADM Project was unique due to the nature of the ADM site and its land uses. The ADM Trip Generation was ultimately finalized in March, 2016 after extensive coordination with all applicable review agencies. Miami-Dade provided approval in an email dated March 18 and FDOT's letter was dated March 24. The final ADM and Graham Trip Generation tables are included in the updated report. An appendix is dedicated exclusively to the development and final approval of the Trip Generation.*

- Do the pass-by trips only apply to the retail-oriented land uses?

*LC: Yes, please refer to the updated Trip Generation table.*

- 10% of the adjacent street traffic is a rule of thumb for pass-by values, according to the FDOT Transportation Site Impact Handbook.

*LC: Acknowledged. All roadways have been checked to ensure that the passer-by trips do not exceed the 10 percent threshold.*

- Provide a separate table showing the combined trip generation and combined analyses for both the ADM and Companies Applications for years 2020 and 2040.

*LC: The combined analyses are included in the revised report, as requested. The trip generations continues to be separate for the individual Projects since they have distinct trip distributions. The combined project trips for the two sites are included in all Combined traffic analyses, as requested. The revised report has been divided into distinct sections that pertains individually to the ADM, the Graham, and the Combined analyses and resulting traffic impacts, along with a general section that provides an overview of information that is relevant regardless of the analysis being presented. Furthermore, Concurrency analyses, CDMP analyses, and Zoning analyses are included in the three separate "project" scenario sections. The same approach has been taken to the Appendices. As summarized in the report, the individual sections and the precluding general section can be removed from the report, along with corresponding Appendices, to obtain just the information that relates to either the ADM, the Graham, or the Combined analyses.*

Table 6, Trip Generation Summary for ADM

- Explain how the vehicle occupancy was applied for the light rail adjustment.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

- Trip generation depends on the survey conducted – we want to look at alternatives.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

#### **Page 17, Section 6.0 Background conditions (Years 2020 & 2040)**

- The County Platting Division has indicated that there is substantial development along NW 97 Avenue in the City of Hialeah. Provide information regarding these developments and consider their traffic impact in the analyses.

*LC: Noted. The County has provided a list of planned platted projects to include in the analysis. The projects have been added to the travel demand forecasting socio-economic data for study years 2020 and 2040 and are considered in both the CDMP and the Zoning analyses and supporting traffic studies.*

## **Figures 6, 7, and 8, Cost-Feasible and Planned Improvements**

- Show only the Cost Feasible Roadway improvements (funded Priorities I through IV roadway improvements) listed in the adopted 2040 LRTP.

*LC: The Cost Feasible Plan Priorities I through IV roadway improvements have been shown separately as requested. The additional projects are based on requests from the County, City of Hialeah or direction from ADM and are addressed separately in the report. It is understood that any roadway improvement referenced for the report and its analyses for respectively the ADM and the Graham Projects will have to be in place by the year 2020. Any modification could require a reanalysis of the traffic impacts as applicable.*

## **Page 25, Section 7.0 Project Trip Distribution and Assignment**

- Provide the plots showing the new TAZs with the centroids and connectors. Figure 9, 2020 Daily Project Distribution, and Figure 10, 2040 Daily Project Distribution

*The model plots included in the revised report are contained in a supporting Appendix and have network plots for the updated analyses which show the centroid connectors.*

- Expand the study areas for each application and for the combined applications. It is unclear how trips are distributed. Review of Figures 9 and 10 indicate that only individual application trip attenuations were performed based on the 5% Rule methodology. Provide a trip distribution for the combined trips generated by both applications. Furthermore, the percentages along the expressways stopped at higher numbers, such as 11.6% (11.3%) along the HEFT going south and 15.4% (17.9%) along I-75 going east. Trips should be extended farther, in all directions and distributed to surface streets until the percentages reach 5% or less. Provide a new Study Area map for the combined ADM and Graham Companies traffic impacts equivalent to or greater than 5% of the maximum service volumes on the 2020 and 2040 roadway networks.

*LC: The updated report has been expanded to review the combined impacts of the two developments as the criteria for determining the traffic analyses study area. The ADM and Graham project traffic are also reviewed separately for their individual traffic impacts and potential mitigation needs. Particular focus has been given to regional facilities such as HEFT, the Turnpike, and I-75 where substantial additional roadway links were reviewed. In short, the updated study area was refined to ensure that all roadway were extended one link past the 5% criteria, where applicable.*

- Provide the supporting information in the Appendix H for all these maps.

*LC: The revised report contains the requested update to the model network plots. Since the study area was expanded, the model network plots have been expanded to provide a separate plot for the Northeast, the Northmiddle, the Northwest, the Southeast, the Southmiddle, and the Southwest areas of the ADM/Graham Project study area. Plots are provided for three model runs; namely the 2020 land use on the 2020 network (CDMP*



*and Zoning analyses), the 2040 land use on the 2040 network (CDMP only), and the 2040 land use on the 2020 network (Zoning only).*

**Page 29, Section 8.0 Build-Out Conditions (Years 2020 & 2040)**

Tables 9, Short-Term (Year 2020) Study Area Roadway Segment LOS Analysis and Figure 10, Long –Term (Year 2040) Roadway Segment LOS Analysis.

- Clarify if two-way analyses are also included, particularly for the 2020 and 2040 scenarios.

*LC: The Peak Hour Peak Direction was analyzed in the previously submitted December 2015 report. The revised report includes both the peak directional and non-directional traffic, as requested. This is done for respectively the CDMP and the Zoning analyses, along with many of the supporting studies as applicable. The Concurrency review is also based on directional traffic.*

**Page 35, Section 9.0 Mitigation Analysis**

- As indicated in the *Instructions Report*, the analysis must consider only on the Cost-Feasible Plan of the 2040 LRTP (funded Priority I through IV) roadway improvements and should not consider partially funded, unfunded, or private projects. The applicants must be responsible for any additional roadway or transit improvements needed as a result of the impacts of their applications.

*LC: Please refer to earlier response to Miami-Dade Department of Regulatory and Economic Resources comments relating to Figures 6, 7, and 8 and the expanded roadway improvement figures and tables presented in the updated report.*

**Appendixes**

- Review of Appendix B indicated higher growth for expressways. For example, for I-75 and the HEFT the historical volumes for most of the segments will result in higher growth rates. Please verify and revise accordingly.

*LC: The traffic growth review has been revised to include not only additional roadway links, as determined based on the study area review, but also by setting several criteria for future year growth projections. For example numerous roadway links were identified to have annual growth rates higher than ten percent per year. It is unrealistic to expect that background, without project trips, will continue to grow at these historically observed growth rates through the year 2040. Similarly, there are roadways which have negative historical growth forecasts. To provide more reasonable background volume forecasts, the growth rates for year 2020 was set at a minimum of 1 percent and a maximum of 5 percent for the time period 2015 through 2020, except expressways which were limited to 2.5 percent. The growth rates for the year 2040 background traffic was once again set at a minimum of 1 percent but with a maximum of 2 percent for the time period 2015 through 2040, except freeways which were limited to 1.5*

*percent. Also, any 2014 traffic counts were applied a conservative 2 percent growth to forecast year 2015 existing conditions. Again, as previously mentioned, a detailed review of growth rates and above mentioned criteria are documented in the report.*

- Provide detailed modular plots for the entire impact study area in Appendix H1. Also, provide plots for the combined analysis in order to identify the impact of the combined applications.

*LC: Updated plots have been included for both the ADM and the Graham Project trip distributions and have been expanded to encompass the revised study area. A separate trip distribution is not applicable for the Combined Project trips, since the traffic analyses distinctly show the two Projects separately throughout. The Combined analyses do contain the addition of the two Project site traffic volumes for a Combined Total Project Traffic projection.*

### **Additional Comments**

- Provide the County with any information or traffic analyses provided to other agencies as input and for review, such as the interchange justification and interchange modification reports.

*LC: Comment noted. We will continue to work corporately with County staff to ensure that all efforts are coordinated. No separate information has been furnished to any other agencies at this point. The upcoming efforts for the federally and state guided freeway efforts will be coordinated with the County.*

- Identify roadways where schools exists or are planned and performed the corresponding AM Peak Hour analyses.

*LC: The traffic analyses for the revised report and its analyses have been enhanced to include the AM traffic, along with the PM traffic, for all study links and therefore addresses the coverage of any schools located within the study area.*

- Provide information regarding any plans for future transit service to serve the subject application sites.

*LC: The report addresses all the roadway needs for each the ADM and the Graham Projects. The ADM Team has previously indicated that shuttle service will be provided to and from its Site to nearby location such as the Miami International Airport. The specifics of transit commitments will be addressed following the completion of the CDMP and Zoning analyses.*

- Add a new column to Tables 1, 9 and 10 identifying the traffic count station of each roadway segment analyzed. Also, include every major section roadways, arterials and collectors in the analyses.

*LC: The traffic count stations have been added to the Existing Study Area Roadway Segment LOS Analysis table and other tables were traffic counts are referenced directly*

*such as the Background Summary table. As previously noted, the study area has been expanded to include the combined ADM and Graham project trips based on the 5% criteria. A review was made to ensure that all major roadways were included in the analysis.*

- Add a Table of contents and a one- or two- page Executive Summary to the report.

*LC: As requested, a Table of Contents has been added to the revised report and an Executive Summary has also been included.*

- The County calculate the Impact Fees based on ITE trip generation codes. Provide information on the impact fees for the ADM Application.

*LC: Preliminary Impact Fee analyses for the ADM and Graham Project applications are included in supporting Appendices, as requested, and has been prepared in accordance with the County's guidelines. The Impact Fee analyses includes reference to site specific trip generation information and updated present day cost (PDC) factors.*

**Miami-Dade County Department of Regulatory and Economic Resources – January 28, 2016**

The Miami-Dade County Department of Regulatory and Economic Resources provided a map and table listing approved plats, along with the traffic reports submitted. These are the plats in the vicinity of the Nov. 2015 CDMP App. Nos. 1 & 2, the ADM and Graham applications.

*LC: The provided approved platted projects have been added to the updated socio-economic data for the year 2020 and year 2040 travel demand forecasting model runs to ensure that the platted projects are accounted for in the ADM and Graham analyses, as well as their Combined analyses. The requested projects are included in the Appendix as reference, along with a summary table of the TAZs that have been updated for the requested platted projects plus the ADM and the Graham site TAZs.*

## **Miami-Dade County Transit – January 21, 2016**

### **Requested Amendments**

1. Re-designate the application site on the Land Use Map:

From: "Industrial and Office"

To: "Business and Office"

*These comments are addressed as part of the Land Use application.*

2. Delete the 0.45 Floor Area Ratio (FAR) limitation on the portion of the Application area west of NW 97 Avenue

*These comments are addressed as part of the Land Use application.*

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 land within the subject property

*These comments are addressed as part of the Land Use application.*

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;

*These comments are addressed as part of the Land Use application.*

5. Amend the Transportation Element Figure 1- Planned Year 2030 Roadway Network; Figure 2 – Roadway Classification 2012; and Figure 3 – Roadway Functional Classification 2030).

*These comments are addressed as part of the Land Use application.*



## **Broward County Planning and Development Management Division—January 25, 2016**

1. The study area maps (Figure 3 for Year 2020 and Figure 4 for Year 2040) show the impacts associated with the ADM and Graham individually. The study areas should be calculated based on both ADM and Graham collectively.

*LC: The updated analyses have been expanded to review the combined traffic associated with the two developments and serve as the criteria for determining the study area. The Combined analyses are presented for informational purposes only since each individual project will be responsible for its own transportation impacts. Updated mitigation figures and tables include Combined mitigation information with footnotes pertaining to how they relate to the individual ADM and Graham Projects and their mitigation needs.*

2. Additionally, the traffic impacts of major developments in northwestern Dade County on southern Broward County should be modeled and evaluated. In addition to the ADM and Graham projects, the projected development of the Landmark property (between NW 47 and NW 57 Avenues and between NW 199 Street and Snake Creek Canal) should be included in the analysis.

*LC: The model socio-economic data represented in the model year 2020 and year 2040 zdata files represents the latest adopted land use information within the area. In addition, Miami-Dade County provided a list of 20 platted projects to include in the analysis. These projects have been added to the year 2020 and year 2040 model socio-economic data. No further refinements were made to the zdata.*

3. Trip generation for ADM is based on an adjustment to the GLA-based rate for Mall of America (MOA). ADM will be about 35% larger than MOA and trip generation is increased a like amount to estimate trip generation for ADM (49,800 vs. 67,251). However, the theme park and related features are included within the gross floor area (GFA) but not within the gross leasing area (GLA). For this application, the non-leasable area of ADM could reasonably be expected to generate trips. The GFA for the ADM will be 41% larger than MOA (vs. 35% for the GLA); given the unique nature of these developments, the trip adjustment should be based on GFA.

*LC: Both the ADM and Graham Project Trip Generations were revised and finalized between the time of the December 2015 CDMP TIA submittal and the submittal of the updated and expanded report. The Trip Generation for the ADM Project was unique due to the nature of the ADM site and its land uses. The ADM Trip Generation was ultimately finalized in March, 2016 after extensive coordination with all applicable review agencies. Miami-Dade provided approval in an email dated March 18 and FDOT's letter was dated March 24. The final ADM and Graham Trip Generation tables are included in the updated report. An appendix is dedicated exclusively to the development and final approval of the Trip Generation.*

4. The light rail transit (LRT) adjustment is stated to be 10.8 percent, but the adjusted increase in trip generation is only about 7 percent. The justification for this appears to be that MOA has an average vehicle occupancy (AVO) of 2.3 but the study assumes that ADM will have an AVO of 4.0 based on AVO's calculated for Orlando area theme parks. However,

ADM will be a retail/entertainment complex congruous in nature to MOA, so much so that trip generation is based on MOA. Orlando theme parks are primarily entertainment complexes vs. retail/entertainment complexes. Therefore, it is reasonable to expect the AVO for ADM to be similar to that of MOA and the effective LRT adjustment should reflect the 10.8 percent value.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

5. Information is limited in the report for the hotel component of MOA. Per our research, it appears MOA has a maximum of 850 on-site hotel rooms whereas 2,000 rooms are planned for ADM. This ratio of hotel rooms for ADM to MOA is not consistent with the 35% adjustment in trip generation and further puts into question the values used in the study to estimate ADM traffic.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

6. The MOA trip data provided by Cambridge Systematics (included as an appendix to the TIA) indicates that a significant amount of the trips to and from MOA that have origins within an approximate 15-mile radius, however, there are also significant numbers of trips being made from approximately 60 miles or more. Approximately half of the trips have travel times in excess of 30 minutes, with 23% of trips having travel times greater than one hour. Given the fact that the ADA site has land uses that could attract trips from even further distances than the MOA site, the dissipation of ADM and Graham Property trips shown on the submitted TIA trip distribution maps seems to be more rapid than what would be expected based on the MOA site data. In other words, the TIA trip length distributions seem shorter than expected, reducing the size of the impact area. Please provide the SERPM model trip distribution plots for the ADM and Graham project zones for a 10-mile radius for the 2020 and 2040 model runs so that trip lengths can be further evaluated. If trip-length distribution curves are available for the project zones from the model outputs, please provide those as well. The longer project trip lengths also puts into question the diverted trip credit assumed for the TIA as it appears a substantial portion of ADM trips will be destination-oriented rather than diverted link or pass-by.

*LC: The revised report contains updated network plots. Since the study area was expanded, the model network plots have been expanded to provide a separate plot for the Northeast, the Northmiddle, the Northwest, the Southeast, the Southmiddle, and the Southwest areas of the ADM/Graham Project study area. Plots are provided for three model runs; namely the 2020 land use on the 2020 network (CDMP and Zoning analyses), the 2040 land use on the 2040 network (CDMP only), and the 2040 land use on the 2020 network (Zoning only).*

*The sub-area model obtained from the Turnpike SERPM 6.5.4 Model utilized for the ADM and Graham traffic analyses is restricted to the areas contained in the provided network percent project distribution plots. For regional trips, manual adjustments were made to the*

*model distributions to extend the trips for the regional HEFT, I-75, and Turnpike facilities. The revised report therefore addresses the adjustment of trip distribution to account for more regional trip making.*

*The diverted trips have been finalized as part of the final Trip Generation approved in March 2016 and adjustments have been made to ensure more regional trips are assigned on regional facilities.*

7. Please provide the SERPM model loaded total volumes and v/C ratio plots for the surrounding network for an approximate 10-mile radius surrounding the project zones (it is acknowledged that the model v/C's are not equivalent to the segment v/C's using FDOT planning level-of-service procedures).

*LC: The background trips utilized in the analyses were obtained from existing PHP traffic volumes derived from local FDOT and County traffic counts and are based on historical growth projections as detailed in response to MDC RER Comment on the Appendices. The only referenced model volumes are for non-existing roadway facilities. The resulting future volume therefore will vary for the majority of roadway links from the SERPM model forecasts trips. It would therefore not make sense to review the volume-to-capacity ratios from the model when a more detailed analysis is contained in the various traffic analyses presented in the updated report.*

8. Please provide a summary table of the model land use data files (ZDATA files) for the study area traffic analysis zones for the various 2020 and 2040 model runs.

*LC: A summary table of the ZDATA refinements included for the ADM and Graham CDMF analysis are included in supporting Appendix. The table summarizes the zdata information for the two Projects and their TAZs, as well as County requested Platted Projects also updated in the model zdata.*

9. Based on the TIA narrative, the Applicant indicates that there will be additional traffic analysis provided beyond that currently included in the CDMF traffic impact analysis. Broward County staff has concerns about the frictional impacts that the expanded I-75 interchange will have on an already congested I-75 mainline as well as what impacts the proposed access ramps onto the HEFT will have on the adjacent HEFT mainline operations. Please describe what additional traffic operations analysis will be provided to address these areas.

*LC: As stated in the introduction to the comment responses, "In addition to these traffic studies, the interchanges themselves must undergo State and Federal studies including but not limited to; Reevaluations of the interchange analysis included in the I-75 PD&E, Interchange Access Requests (IAR), and Turnpike Interchange Justification Reports (TIJR). All these studies will be reviewed and coordinated by the FDOT and FHWA, and are very comprehensive with detailed State and Federal guidelines." These further studies will focus on the operational aspects of these nearby freeway facilities and their respective ramps.*

10. Continuing from the above comment, an operational analysis of the I-75 @ Miramar Parkway interchange and adjacent should be performed as more than 5% of the current project distribution impacts this interchange. Broward County staff has concerns regarding impacts to the interchange operations as well as the arterial mainline of Miramar Parkway. Additionally, existing Broward MPO data show Miramar Parkway east and west of I-75 significantly overcapacity (peak-hour v/C's of 1.47 and 1.21) whereas the TIA analysis for existing conditions shows those links operating at LOS "C".

*LC: Please see above response related to more detailed operational review being performed in other future freeway studies.*

*In regards to the traffic volumes for the Miramar Parkway, the traffic volume used for the analyses is based on the January 24, 2014 traffic count information provided by Broward County. The provided count does not reflect V/C ratios exceeding the adopted LOS.*

11. Please provide the project distributions along the segment of Flamingo Road/Ludlam Road from Red Road in Broward County to NW 188 Street in Miami-Dade County. This corridor is one of the few continuous north/south corridors that crosses county lines other than the expressways in the area. It is currently a two lane facility and could potentially become a parallel reliever to other roadways forecasted to be over-capacity.

*LC: Please refer to the supporting Appendix model distribution plots for information relating to distribution of ADM and Graham Project trips on Flamingo Road/Ludlam Road. As noted no project traffic is assigned for either of the two Projects to this facility and therefore the roadway was not added to the traffic analyses performed in the updated report.*

12. The TIA narrative essentially indicates that the ADM and Graham projects generally have no significant impacts or capacity mitigation requirements beyond the project access needs due to the fact that the significantly impacted roadway segments that are forecasted to operate below the adopted LOS standard were already forecasted to operate below the standard without the projects. However, some of the project's impacts represent a significant percentage of the adopted level-of-service capacity of the failing links, creating a much more severely failing condition on these segments. It seems that a land plan application that further degrades a failing links should be required to mitigate at least its additional impact to the failing links, or propose other mitigation, potentially on parallel facilities to offset these impacts. Please clarify the projects' mitigation responsibilities relative to these impacts as part of the CDMP process.

*LC: The mitigation impacts associated with each the ADM and the Graham Projects are clearly defined in the revised report and take into consideration all segments with deteriorated LOS conditions and Project trips exceeding the 5% of the Maximum Service Volume criteria for significant links. The mitigation impacts are addressed according to whether the traffic volumes exceeding roadway capacity is due to it being backlogged trips or Project only impacts and are consistent with State guidelines established in HB 7207.*

13. For the American Dream project, ITE land use code 820 was not considered an acceptable source of data. Please explain why it is acceptable for calculating trip diversion. The number of diverted trips appears to be overestimated, especially given the fact that the

study states that "30% of MOA visits were made from outside the region" and that "nearly half of MOA trips travel over 30 minutes to arrive at the site." A smaller number of diverted trips and longer trip lengths would have a more negative effect on Broward County facilities.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report. Also, please refer to response to Broward County Planning and Development Management Division No. 6 in regards to adjustments made to account for more regional trip making.*

14. During the review meeting held at SFRPC on January 22, 2016, there was discussion of extending transit to this site and construction of park and ride facilities. Whilst Miami-Dade Transit will be the primary service provider, staff would encourage the applicant to explore option for transit service north of the site with Broward County Transit. Transit riders are likely to be employees working in retail, hotel and park components of the project. South Broward County has many residential neighborhoods which would be included in the future labor pool.

*LC: Transit is not directly referenced in the traffic analysis. Transit will be addressed subsequent to the completion of the CDMP TIA and supporting traffic analyses contained in the updated report. Discussion will include Broward County as it relates to any transit services extended within its County boundaries. The CDMP and Zoning analyses address transit in general with further information to be established separately.*



## **Florida Department of Transportation, District 6, District 4 – January 28, 2016**

### **General Comments**

1. Pursuant to House Bill (HB) 359 and Florida Statute (F.S.) 373.4149 (Miami-Dade County Lake Belt Area), *“Rezoning, or amendments to local zoning and subdivision regulations, and amendments to local comprehensive plans concerning properties that are located within 1 mile of the Miami-Dade Lake Belt Area shall be compatible with limestone mining activities. No rezonings, variances, amendments to local zoning and subdivision regulations which would result in an increase in residential density, or amendments to local comprehensive plans for any residential purpose may be approved for any property located in sections 35 and 36 and the east one-half of sections 24 and 25, Township 53 South, Range 39 East until such time as there is no active mining within 2 miles of the property.”*

Given that the proposed comprehensive plan amendments are located within one mile of the Lake Belt Area and an increase in residential development intensity is planned on The Graham Project site, please provide sufficient documentation that demonstrates this comprehensive plan amendment complies with HB 359 and F.S. 373.4149.

*These comments are addressed as part of the Land Use application.*

2. ADM and the Graham Project propose improvements that affect existing interchanges, a future full interchange, and a future partial interchange (Miami Gardens Drive at I-75, HEFT at I-75, a new interchange at HEFT and NW 170<sup>th</sup> Street, and a partial interchange at NW 178<sup>th</sup> Street and I-75). An Interchange Access Request (IAR) document, consistent with the FDOT Interchange Access Request – User’s Guide, will be required for each of the interchange modifications. Additional traffic analyses will be required to evaluate impacts upon Strategic Intermodal System (SIS) facilities and interchanges during morning, afternoon and weekend periods, and to identify improvements to accommodate the additional future traffic.

*LC: We acknowledge FDOT’s comment. As noted in the introduction to the comment responses, there will be further traffic analyses beyond the revised CDMP and Zoning report. At such time, the specific Federal/FDOT requirements will be addressed.*

3. Several transportation improvements projects are relied upon to demonstrate adequate public facilities will be present by 2020 to accommodate the expected travel demand generated by ADM and The Graham Project. These include an interchange modification at HEFT and I-75, a new interchange at HEFT and NW 170<sup>th</sup> Street, a new partial interchange at I-75 and Miami Gardens Drive. Each of these interchange improvements ultimately requires approval by FDOT and the Federal Highway Administration (FHWA).

If any of the interchange improvements fail to be approved and/or constructed by 2020, the base transportation network that is the foundation of ADM and The Graham Project’s traffic analysis is invalid. This would result in additional transportation impacts to area roadways that were not analyzed. Therefore, it is recommended that a condition of approval be included for the ADM and The Graham Project CDMP submittals that they are contingent

upon obtaining the requisite FDOT and FHWA approvals for the proposed interchange access changes. If any of the relied upon traffic impact analysis will be necessary.

*LC: Acknowledged. The ADM and Graham Project CDMP analyses are based on the mentioned interchange improvements being in place by the year 2020 and it is understood that if these interchanges are not implemented by that time that there may need to be updated traffic analyses.*

4. In Table 8, there are projects funded in Priority IV of the 2040 Long Range Transportation Plan (LRTP) and assumed to open in different years, such as NW 170th Street from HEFT to NW 97th Avenue. Please provide clarification about how the applicant intends to advance these projects such that they are constructed by the year used in the traffic analysis. The funding source and commitment must be clarified for these improvements.

*LC: The five Priority IV roadway projects accelerated to 2020 and presented in the December 2015 CDMP TIA were:*

- *I-75, SR 826 (Palmetto) to NW 170 St - Widen with Express Lanes*
- *I-75 at Miami Gardens Drive - Modify Interchange*
- *SR 821 (HEFT), NW 57 Ave (Red) to Turnpike (Mainline) - Widen to 8 Lanes*
- *SR 821 (HEFT), I-75 to NW 57 Ave (Red) - Widen to 8 Lanes*
- *Miami Gardens Dr/NW 186 St, NW 97 Ave to I-75 - New 4 Lane Road (6L Assumed)*

*In addition, the NW 170th Street project referenced in above comment is accelerated from Phase III to the year 2020:*

- *NW 170 St, SR 821 (HEFT) to NW 97 Ave - 6 Lane Divided Road*

*The ADM representatives understand the necessity of these projects being in place by the year 2020 for not only the CDMP analysis and its findings but also for the viability of the ADM Project being implemented. The Client will work with local agencies to ensure that they are completed. The funding source and commitment are part of the efforts which are being pursued to ensure that the projects become a reality.*

#### Section 4.0 Existing Conditions (Year 2015)

5. As noted on page 8, please clarify the source for the directional split factors used to convert non-directional service volumes from the Miami-Dade database.

*LC: The revised existing traffic conditions analyses are based on traffic counts from either FDOT, Miami-Dade County or Broward County. In a few cases, such as the Florida's Turnpike, K and D factors were obtained from the FDOT daily counts (where 15 minute synopses or hourly counts were not available) and were applied to obtain directional and non-directional existing traffic volumes. Supporting information provided in Table I-15 shows the process used to identify the existing traffic counts and specifies the directional NB/EB and SB/WB volumes.*

6. Please describe the source and justification for applying an assumed 1% growth to extrapolate 2014 volumes to 2015 existing conditions.

*LC: The updated report provides a historical as well as existing summary of available traffic counts. When reviewing Table I-13, it is clear that historically there is varying traffic growth on individual facilities. Some roadways have experienced extensive annual growth since 2010 and others have decreased in traffic volumes over the same time period. The 1 percent growth was therefore a conservative approach for the area and represented a reasonable assumptions for reviewing the increase in traffic between 2014 and 2015, and beyond. For purposes of converting existing 2014 FDOT counts to the year 2015, a 2 percent is now being applied for the June 2016 Update to be more conservative. Notably, the percentage growth between 2014 and 2015 does not impact the projected traffic forecasts through the year 2020 and 2040 since historical trends (generally from 2009 through 2014) was the main resource for estimating the future year background traffic volumes. Notably, many roadways are estimated to have this minimal 1 percent growth beyond year 2015 based on the final percent growth estimates derived for the analyses and as reflected in Table I-13. Also, please note the maximum growth rates set for the two analyses years.*

7. In the first bullet on page 8, please consider adjusting the eastern limit of the HEFT project to NW 27<sup>th</sup> Avenue.

*LC: The study area for the CDMP has been expanded based on the combined traffic from the ADM and Graham Projects and to ensure that a regional focus is represented for the ADM trips. As a result, the study area now includes extension of HEFT beyond the December 2015 CDMP TIA study boundary.*

#### Section 5.0 Trip Generation

8. The total acreage for The Graham Project in Table 3 does not match the total acreage in Table 2. Please revise the appropriate table to maintain consistency of the property's acreage throughout the report.

*LC: Table 2 shows the overall acreage for the ADM and Graham Projects as respectively 194.1 and 340.1 acres. Table 3 includes the total 194.1 acres for ADM and incorrectly shows the 279.9 acres West of NW 97th Avenue and 60.2 acres East of NW 97th Avenue as 345.8 acres. The Trip Generation table has been updated in the revised report to reflect the 340.1 acres obtained by summing the East and West sides.*

9. Pursuant to the ITE Trip Generation Handbook, "Diverted linked trips are trips that are attracted from the traffic volume on roadways within the vicinity of the generator but require a diversion from that roadway to another roadway to gain access to the site." Since trips to ADM and The Graham Project travel to both generators via limited access facilities adjacent to the sites, they add traffic to streets that directly connect to the sites. As a result, these trips are classified as diverted linked trips and not pass-by trips. Please revise the trip generation analysis accordingly for both ADM and The Graham Project.

In addition, such diverted linked trips must be accounted for when evaluating the project's impact on the on the adjacent streets that connect directly to both sites. Please revise the roadway link analysis (summarized in Tables 9 and 10) and include diverted linked trips assigned to Miami Gardens Drive, NW 170<sup>th</sup> Street and 178<sup>th</sup> Street. The revised roadway link analysis should include these diverted linked trips, a text description of what these diverted linked trips represent, a summary of the calculations to quantify these trips and a graphic that depicts where these trips are assigned to the roadway network.

*LC: Both the ADM and Graham Project Trip Generations were revised and finalized between the time of the December 2015 CDMP TIA submittal and the submittal of the updated and expanded report. The Trip Generation for the ADM Project was unique due to the nature of the ADM site and its land uses. The ADM Trip Generation was ultimately finalized in March, 2016 after extensive coordination with all applicable review agencies. Miami-Dade provided approval in an email dated March 18 and FDOT's letter was dated March 24. The final ADM and Graham Trip Generation tables are included in the updated report. An appendix is dedicated exclusively to the development and final approval of the Trip Generation.*

*The traffic analysis has been prepared in accordance with the described methodology for applying diverted vs. non-diverted trips. To demonstrate that the diverted trips are in fact included on the indicated links, the Net External Trip Generation (applied for diverted trips links) have been added to Tables I-17 through I-19 and are highlighted in green to match with the green highlighted diverted trips.*

10. Regarding the pass-by trips percentages from ITE code 820: Shopping Center, The Graham Project uses 35% in 2020 (150 KSF) and 20% in 2040 (1,000 KSF). ADM uses 14% (3,500 KSF). There is no fitted curve in the 3<sup>rd</sup> edition of the ITE Handbook (latest version), and there is no evidence to suggest that the curve would flatten at 900 KSF, beyond which there are only four data points. A fitted curve for this data would most likely be under 20% for the 2040 Graham Companies property and below 10% for the ADM (which would be 3 graph lengths away from the end of this plot). Basing the pass-by rate on the three data points over 1,000 KSF is not a statistically valid methodology. A more appropriate methodology would utilize a curve or other observed data.

Please revise the trip generation analysis accordingly for both ADM and The Graham Project.

Additionally, please provide the calculations confirming the "pass-by"/diverted linked trip reduction reasonableness check to ensure it represents no more than 10% of the volume of the adjacent street. Such a check should be performed separately for ADM and The Graham Project.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

11. In Table 6, an auto occupancy factor of 2.3 is reported, but it is not clear how this factor was derived. The Mall of America (MOA) Survey data cited in Appendix G indicates that the size of a typical party surveyed at MOA breaks down as 44% 1 person, 35% 2 person, 21 % 3+ people. Assuming the average party size in the 3+category is 3.5, then the average

party size would be 1.9. It is unclear if a cross-classification of mode of travel and size of party was analyzed to specify the size of party for users of personal automobiles. Please clarify the methodology used to calculate the reported auto occupancy value of 2.3, and include in the report the calculations supporting the text.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

12. The assumption that trip rates derived for GLA (Retail) from MOA can be applied directly to the retail GLA of ADM is questionable. The implicit assumption is that the non-retail portions of the MOA and ADM will have similar trip generation characteristics. Currently, the only support provided is that the retail square footage as a proportion of the gross floor area is similar. But a comparison of the non-retail square footage of the two developments is not discussed in the application

From previous information provided by ADM, the non-retail portion of MOA consists of 31% common areas, compared to 19% common areas in the ADM development. While the proportion of retail GLA in the two developments is comparable (at 56% for ADM and 59% for MOA), the proportion of non-retail attractions in the two developments is not (with 24% in ADM and 11% in MOA). Given this discrepancy, FDOT recommends that Gross Floor Area (GFA) be used as the independent variable for the trip generation analysis to ensure that the total proposed development intensity of 6.2 million square feet is included in the analysis.

Finally, please clarify the apparent discrepancy of GLA square footage reported in Tables 4 and 6 that distinguish between entertainment and retail uses.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

13. For internal capture calculations for the Graham Companies property, please consider using the internal capture rates for origins and destinations within a multi-use development found in the FDOT Trip Generation Recommendations Report, October 2014, as well as National Cooperative Highway Research Program (NCHRP) Report 684. Excerpts of the relevant pages from this document and the ITE Trip Generation Handbook are attached for your convenience.

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

## Section 7.0 Project Trip Distribution and Assignment

14. Using MOA data, ADM and The Graham Project assumed that approximately 30% of all trips are non-regional. It is stated in the CDMP traffic analysis that modelling efforts were made to distribute this magnitude of volume to HEFT and I-75. To verify the travel characteristics

associated with MOA in Minneapolis are comparable to ADM in Miami, it is recommended that additional documentation be provided to substantiate the non-regional trip assumption. This should include a tabular summary comparing several trip generators that attract non-regional trips to document and verify the proposed 30% assignment. Potential large scale retail uses to review that attract non-regional traffic include Sawgrass Mills Mall which also happens to be located within the area covered by the Southeast Regional Planning Model (SERPM).

This additional documentation also should include accurate model network plots in Appendix H to depict all centroids for ADM. Please note that the impact of the study area links definition must be described in the report. If ADM's trip length frequency distribution is underestimated, it is possible that the impacts to roadways and the number of impacted roadway segments also are underestimated.

*LC: The revised report addresses the adjustment of trip distribution to account for more regional trip making. For regional trips, manual adjustments were made to the model distributions to extend the trips for the regional HEFT, I-75, and Turnpike facilities. The revised report therefore addresses the adjustment of trip distribution to account for more regional trip making.*

*The model plots are included in the revised report as part of the Appendix. Plots have been enhanced to show the requested centroid connectors, along with the expanded study area.*

*The 30 percent trips assigned via HEFT are based on the observed patterns from the MOA site. Similar distribution patterns are not likely to occur even at large shopping malls within the area, so no further review was completed in relation to the utilized 30 percent.*

15. The land use data factoring cited in the second paragraph on page 25 is unclear. The applicant should add text to the report clarifying what is meant by factoring and the impact of doing so.

*LC: The text contained in the referenced paragraph has been expanded to more clearly detail the process for ensuring that the model assignments at the corresponding traffic analysis zones used for distributing the ADM and the Graham Project trips match those identified in the Trip Generation summary.*

16. Please include text in the report describing the reasonableness of the model's performance. The applicant must analyze and document the study area link volumes relative to counts. Study area links representing new roadways are of particular concern because model volumes are utilized as the only source of traffic data for these links.

*LC: The model volumes are only used for new facilities. It is acknowledged that new traffic links are always a concern because there is no historical information to relate to. Text has been added to the report.*



### Section 8.0 Build-Out Conditions (Years 2020 & 2040)

17. The method utilized to compute 2020 and 2040 build-out level of service (LOS) in Tables 9 and 10, respectively, distinguishes diverted trip route segments for which pass-by reduction is not applied (shaded in green in the tables). The project trip estimates used to compute volumes for these links should be the Net External Trips, rather than New External Trips (from Table 6). Neither appear to be used for the diverted trip route segment. The computations for project traffic on those links must be clarified and revised, as applicable.

*LC: The project trips assigned for the links where the pass-by reduction is not applied is computed utilizing the Net External Trips.*

### Section 9.0 Mitigation Analysis

18. The transportation improvements identified in the submitted CDMP traffic impact analysis are based on PM peak hour traffic conditions. Please note that additional transportation improvements may be identified as part of the IAR documentation to address adverse impacts during AM and weekend peak periods that were not required as part of this CDMP evaluation.

The mitigation analysis portion of the traffic report also must clarify the funding commitment for the improvements and the entity responsible for constructing each improvement, and consider multimodal or transit mitigation measures.

*LC: The report has been expanded to include not only the revised CDMP PM analyses but also requested AM and Weekend analyses. The Weekend analysis is presented in the Appendix along with a comparison to weekday traffic.*

*The mitigation for the ADM and the Graham Information pertaining to funding commitments and responsibilities are not included in the tables. Nor are multimodal assumptions addressed in the CDMP analysis. Both of these will be addressed later in the Project discussions with MDC staff. Projects are presented for all future year traffic analyses as part of the updated report.*

### **Also Note that an Appendix was received and reviewed from FDOT relating to their Comment No. 13**

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised CDMP TIA report.*

## **Town of Miami Lakes – January 22, 2016**

Page 5: The study says that "... the study area for each development extends to all significant roadways where external trips for each project are forecast to be equivalent to or greater than five percent (5%) of the maximum service volume (MSV) ..." What does "significant roadways" mean? Is there a definitions, or can you identify those roadways that are not considered to be significant? We are concerned that the analysis seems to arbitrarily exclude all roads within the Town of Miami Lakes.

*LC: The intend of the analyses is to show all roadways which has significant impact based on the Project contributing 5% of Maximum Service Volume criteria. To make sure the study addresses the Town's concerns, NW 154th Street (Miami Lakes Blvd) has been extended to include the segments between NW 82nd Ave and NW 57th Avenue. Note none of these links meet the 5% significance test. Further review of the project distribution plots contained in Appendix to the updated report shows that very little Project traffic is assigned within the Town of Miami Lakes boundaries.*

2. Page 5: The study area should be defined by a five percent threshold for of MSV for *both projects* combined. Distinguishing the two projects for traffic analysis purposes is essentially a fiction.

*LC: The revised report has been updated to include not only the individual ADM and Graham Project traffic impacts but also the Combined impacts. The combined traffic serves as the parameter used to identify the overall study area for the traffic analyses. The individual Project findings are consulted for determining any needs associated with their individual Project's mitigation requirements. The Combined impacts and mitigations are shown for informational purposes only.*

3. Page 13: The use of the Mall of America (MOA) as a model for trip generation, with further any further adjustments, needs more analysis and justification. While we agree that the MOA is in general a reasonably close comparable case for a unique project, the MOA is geographically situated very differently within its metropolitan area than this potential mall would be. Given such limited sample sizes, it is essential to at least try to account for how such a difference might affect trip generation. For example, on page 14 it is explained that the MOA's internal capture rate was applied to this project. But would geographic location affect internal capture rate? If so, how?

*LC: Both the ADM and Graham Project Trip Generations were revised and finalized between the time of the December 2015 CDMP TIA submittal and the submittal of the updated and expanded report. The Trip Generation for the ADM Project was unique due to the nature of the ADM site and its land uses. The ADM Trip Generation was ultimately finalized in March, 2016 after extensive coordination with all applicable review agencies. Miami-Dade provided approval in an email dated March 18 and FDOT's letter was dated March 24. The final ADM and Graham Trip Generation tables are included in the updated report. An appendix is dedicated exclusively to the development and final approval of the Trip Generation.*

4. Page 14: Regarding the reduction for diverted trips, and the use of the standard percentage of diverted trips for Shopping Center being used, it seems at least plausible that the percent

of diverted trips for the proposed mall would be significantly lower, given its size and (it seems likely) significant time commitment getting into and out of the facility (i.e. it is less likely to “stop-in” for a meal if it will take significant time to get into and out of the mall). Additionally, this “Shopping Center” diverted trip factor seems to have been applied to all generated trips, even those that are very different from retail (i.e. hotels, amusement parks, etc.), some of which common sense would suggest would have close to zero diverted trips. Is there a justification for applying the “Shopping Center” rate to all trips?

*LC: As noted previously, all issues related to the Trip Generation approach for the ADM have been finalized and are included in the updated ADM Trip Generation reflected in the revised report.*

5. Page 29 (and elsewhere): Regarding Miami Gardens Drive between I-75 and NW 87<sup>th</sup> Avenue in the short term (2020), in several places the traffic study discusses an existing deficiency that WOULD BE existing if the adopted LOS was something other than what it is. However, the LOS on this roadway is adopted partially for policy reasons related to transit and other alternative modes, and not simply as an exception. The analysis should focus on the LOS for this roadway as actually adopted.

*LC: The capacity for Miami Gardens Drive has been revised to reflect the County's adopted LOS information.*

6. Pages 29 and 30: Regarding the long term (2040) LOS of the HEFT from NW 106<sup>th</sup> Street to US 27 and I-75 from Miramar Parkway to Miami Gardens Drive, the study states that “Regression of historical count data shows Year 2040 background volumes could be higher than the available capacity even with the capacity improvement before any project trips are added.” This appears to mean that the model does not show such a failure with the proposed capacity improvement, which would mean that if the project's trip cause the LOS failure, then the applicant would have responsibility for mitigation.

*LC: The statement has been removed from the text. Further note that the future background volumes have been updated to ensure that further constraints exist for forecasting these trips (as described elsewhere in response to comments and as detailed in Table I-13). The CDMP and supporting traffic studies and their respective analyses review all roadway links based on the criteria that 1) if a future year link volume exceeds capacity and 2) the Project trips exceed the 5% of MSV and 3) the facility is not backlogged due to background traffic, then the link is identified as being deficient and mitigation will need to be assessed for the Project.*

7. Page 35: the study states that “All improvements were assumed to be place [sic] by the Short-term Year 2020.” Does County staff believe this is feasible?

*LC: We cannot infer as to what the County believes to be feasible. We do reiterate that it is the ADM's intent that the improvements not reflected in the Cost Feasible Plan will be fully pursued to ensure that they are in place by the year 2020. It is understood that IF for any reason this does not occur that there may need to be reanalyzes completed for the ADM and the Graham sites.*

8. General: the only mitigation proposed in this analysis is for Miami Gardens Drive, in the short term year (2020), which is to minimize left turns and provide an uninterrupted flow section as part of the I-75 interchange improvement. However, if that is the mitigation proposed, there should be an analysis as to what the impact of that mitigation would be.

*LC: The revised CDMP and added Zoning analyses expands on the projected impacts associated with the ADM and Graham projects. The mitigation recommendations have been reviewed for both the roadway segments (all link analyses) and the intersections (Zoning analyses only) to verify that the recommendations needed to achieve acceptable operating conditions have been incorporated, where feasible. For the roadway links, the mitigation results are presented in Appendix II-D for the ADM Project, Appendix III-C for the Graham Project, and Appendix IV-A for the Combined ADM and Graham Projects. Each of the mitigation summaries include the necessary widenings and corresponding capacities to ensure that acceptable LOS operating conditions are achieved.*

*For the intersections, Appendices II-I and II-J summarize the ADM mitigation needs, Appendices III-H and III-I summarize the Graham mitigation needs, and Appendices IV-F and IV-G summarize the Combined ADM and Graham mitigation needs. In the case of the intersections, a maximum number of one exclusive right, three throughs, and two left turns were utilized, which means that there are operating conditions which could not be mitigated.*

*The Combined mitigation results are provided for informational purposes only.*

9. General: It is unfortunate that the CDMP amendment rules do not require analysis of modes of transportation other than automobile. While looking only at traffic numbers, it is straightforward to simply conclude that adding more lanes here or there or creating an "uninterrupted flow section" would result in achieving an adopted LOS, but ignoring the potential impact that such action might have on transit mobility which, after all, requires walkability that is often degraded through automobile "capacity enhancements." Given the significance of this project, not only on its own terms but through its potential as a catalyst impacting a large area around it, this opportunity should be seized upon to evaluate impacts and potential improvements (and including alternative improvements, such as a rail transit connection) to all modes of transportation simultaneously and holistically, such that this significant project could be a starting point to achieving a more multimodal transportation system in the larger vicinity of the project. This opportunity should not be wasted, even if it requires more time than simply applying once again a system that has proven many times over that it does not work.

*LC: We acknowledge the limitation of the CDMP analysis in regards to transit and other non-roadway capacity enhancements. The ADM Project recognizes that there is potential application of transit and other non-motorized enhancements to the Site in the future. No evaluation for transit has been included in the analysis. Transit will be addressed as part of efforts following the CDMP and Zoning analyses.*

**City of Miramar / Miami-Dade County Department of Regulatory and Economic Resources – February 2, 2016**

1. Direct transit service should be provided from the American Dream Miami Mall and Graham industrial/retail development to the park and ride lot at Miramar Regional Park and the Miramar Town Center/Park and Ride.

*LC: The ADM Project recognizes that there is potential application of transit and other non-motorized enhancements to the Site in the future. This would also potentially apply to the Graham Site. Detailed route-specific transit has not been addressed at this time. Transit will be coordinated as part of future discussions.*

2. At a minimum, the analysis should evaluate traffic impacts to Miramar Parkway, Pembroke Road, Red Road/NW 57th Avenue and Flamingo Road/NW 67th Avenue. A level of service analysis at project buildout should be provided for all of these roadways.

*LC: Please refer to the response to Broward County Planning and Development Management Division comment No. 11.*

3. The Miramar Parkway buildout year volumes shown in Tables 9 and 10 of the Transportation Impact Analysis are lower than projections prepared by the Broward Metropolitan Planning Organization. The developer's traffic consultant should meet with the City of Miramar, Broward County, and Broward Metropolitan Planning Organization to discuss the impacts to City roadways and potential mitigation. The City is in the process of updating its Capital Improvement Program to include the extension of Miramar Parkway from its current terminus at SW 192 Terrace to Pembroke Road at SW 196 Avenue. The extension of Miramar Parkway to Pembroke Road will help alleviate the current traffic problem at Miramar Parkway/1-75 Interchange, improve the Level of Service at this intersection and provide an alternate north-south route via US 27.

*LC: Please refer to response to Broward County Comment No. 10. In regards to the traffic volumes for the Miramar Parkway, the traffic volume used for the analyses is based on the January 24, 2014 traffic count information provided by Broward County. The provided count does not reflect V/C ratios exceeding the adopted LOS.*

*The Extension of Miramar Parkway is already included in the Year 2020 Cost Feasible Plan and the Year 2040 Cost Feasible Plan model networks and are therefore already included in the model trip distributions. The roadway segment analyses have also been expanded to include additional segments on Miramar Parkway, as demonstrated in the revised report.*

4. Please provide the housing demand expected to be generated by both projects.

*These comments are addressed as part of the Land Use application.*





*Florida Department of Transportation*

RICK SCOTT  
GOVERNOR

1000 NW 111 Avenue  
Miami, FL 33172

JIM BOXOLD  
SECRETARY

August 5, 2016

Deputy Mayor Jack Osterholt  
Miami-Dade County  
Office of the Mayor  
111 NW 1st Street, 29<sup>th</sup> Floor  
Miami, FL 33128

RECEIVED  
2016 AUG - 5 P 5:24  
RER-PLANNING DIVISION

**Subject: American Dream Miami and Graham Project - Transportation  
Impact Analysis for Comprehensive Development Master Plan  
Dated June 22, 2016**

Dear Mr. Osterholt:

The Florida Department of Transportation, District Six, in cooperation with District Four, completed a joint review of the transportation impact analysis for the American Dream Miami (ADM) and Graham Project (GP) development, which is dated June 22, 2016. This represents a joint Comprehensive Development Master Plan (CDMP) traffic analysis effort between American Dream Miami (ADM) Mall and the 300-acre Graham Companies property located immediately south of ADM.

The mixed-use ADM project and Graham Companies project is located in the southwest corner of the interchange at I-75 and Miami Gardens Drive in northwest Miami-Dade County. The site is also adjacent to the interchange between Florida's Turnpike and I-75. The ADM project totals 6.2 million square feet of non-residential use plus a 2,000-room hotel. Of this, 3.5 million square feet will be dedicated for Retail use, while the remaining 2.7 million square feet is for entertainment uses. These entertainment uses include an indoor theme park, an indoor water park, a sports complex, movie and live action theaters, and a ski slope. The proposed build-out for the ADM project is 2020, while the proposed buildout for the Graham Companies project is 2040.

The Graham Companies project is planned to be completed in phases. By 2020 (which coincides with the buildout date for ADM), the Graham Companies site will



consist of 150,000 square feet of Retail use, 250,000 square feet of Business Park use, and 500 multi-family dwelling units. At the time of its buildout in 2040, the Graham Companies project will include 1,000,000 square feet of Retail use, 3,000,000 square feet of Business Park use, and 2,000 multi-family dwelling units.

The following comments are offered concerning the submitted concurrency, zoning, and comprehensive development master plan traffic analysis.

### **General Comments**

- 1) Since ADM and Graham Property traffic analyses assume interchange improvements that affect an existing or future interchange, an Interchange Access Request (IAR) document, consistent with the *FDOT Interchange Access Request – User's Guide* will be required for each of the interchange modifications. The noted improvements affect an existing, future full interchange, or future partial interchange (Miami Gardens Drive at I-75, HEFT at I-75, a new interchange at HEFT and NW 170th Street, and a partial interchange at NW 178th Street and I-75). Additional traffic analyses beyond that submitted for the CDMP will be required to evaluate impacts upon SIS facilities and interchanges during morning, afternoon, and weekend periods, and identify improvements to accommodate the additional future traffic.
- 2) Several transportation improvements projects are relied upon to demonstrate adequate public facilities are present by 2020 to accommodate the expected travel demand generated by ADM and Graham Project. These include an interchange modification at HEFT and I-75; a new interchange at HEFT and NW 170<sup>th</sup> Street; a partial new interchange at I-75 and NW 178<sup>th</sup> Street; and an interchange modification at I-75 and Miami Gardens Drive. Each of these interchange improvements ultimately requires FDOT and FHWA approval. Please note that current FHWA policy discourages partial interchange configurations and access serving private property. Although FHWA Policy Point #4 stipulates that each case is evaluated on its own merits, it is the Department's experience that obtaining approval for partial interchanges is a difficult and long process that may present scheduling challenges.

If any of the interchange improvements fail to be approved and/or constructed by 2020, the base transportation network that is the foundation of ADM and Graham Project's traffic analysis is invalid. This would result in additional transportation impacts to area roadways that were not analyzed. Therefore, it is recommended that a condition of approval be included for the ADM and Graham Project CDMP submittals

contingent upon obtaining the requisite FDOT and FHWA approvals for the proposed interchange access changes. If any of the relied upon transportation improvements are not approved, a re-evaluation of the traffic impact analysis will be necessary.

- 3) Please provide the electronic Synchro files so that they may be reviewed.
- 4) Please add delay and v/C ratio values to all intersection LOS summary tables for ease of comparison between the various analyses conducted and for verification with the Synchro analysis. Such information is beneficial for understanding the intersection mitigation improvements if the approach and movement specific delay and LOS were provided in tabular format.
- 5) Page 99, 128, & 157, Mitigation Summary, Intersection Improvements: Why were intersection improvements limited to only three variations ( 1 exclusive right turn lane, 3 through lanes, and 2 left turn lanes)? Each intersection depending on location and geometry should have been assessed separately. Unique lane geometries should be tested to determine what is necessary for the intersection to function at an acceptable LOS.
- 6) Please check the page numbering of the report documents. There seems to be some skipped numbers.

### **Executive Summary**

- 7) There are 9 improvements, including interchange improvements at I-75/HEFT/Miami Gardens Drive, a new interchange at HEFT and NW 170<sup>th</sup> Street, and I-75 ramps at NW 178<sup>th</sup> Street to/from southbound I-75, that are assumed to be constructed by 2020. These improvements form the basis of the 2020 roadway network used for the submitted concurrency analysis, zoning analysis, and comprehensive development master plan analysis. It is suggested that these improvements be identified in the Executive Summary, and specified as roadway improvements necessary to accommodate both developments' traffic. This comment also extends to the Mitigation Summary section for Chapters 2 and 3.

### **Chapter 1, Section 6 – Existing Conditions**

- 8) In some instances, FDOT daily traffic volumes were adjusted using K and D factors to estimate peak hour, peak directional volumes for roadways. Please consider using



synopsis reports for those count stations to obtain an actual peak hour, peak directional volume for the existing conditions. Such synopsis reports can be provided by FDOT upon request.

- 9) In Appendix I-D, please include the name of the intersection in the header of all Synchro output worksheets. Also, please identify the type of analysis (HCM 2010 or Synchro 9) and results represented on each worksheet. This applies to all Synchro output worksheets provided for each scenario in each chapter of this submittal package.
- 10) Page 25, Table I-1: For Segment NW 107<sup>th</sup> Avenue from NW 122<sup>nd</sup> Street to NW 138<sup>th</sup> Street, please place Note number (4) under the appropriate column. Also, it is understood that no data was available for this segment, however please explain why the assumption of an AADT of 8,000 was used. How was this value determined?
- 11) Page 31, 1<sup>st</sup> Paragraph: It is stated that Synchro's HCM 2010 methodology will be used for the output results; however the results provided throughout the document and the Synchro outputs in the appendix are not of the HCM methodology. They are instead the calculated delay and LOS from the Synchro system, which does not calculate the results according to HCM. You must choose to print the HCM 2000 or 2010 version outputs within the software. Please provide the HCM output results for all existing conditions and future Synchro analysis.

#### **Chapter 1, Section 8 – Background Conditions**

- 12) Identified in Appendix I-D, unusual cycle lengths were used to analyze many of the intersections. For example, at the intersection of Florida's Turnpike ramp termini and Okeechobee Road a 133-second cycle length was analyzed for the south ramp termini intersection. However, the north ramp termini intersection was analyzed with a 80-second cycle length, even though they were evaluated as an actuated-coordinated system (See page 526 of Appendix I-D). Similarly, at Florida's Turnpike and Red Road, the west ramp termini intersection was studied with a 69.4-second cycle length, and at I-75 and Miramar Parkway, the south ramp termini intersection was analyzed with a 65.4-second cycle length (see pages 532 and 540 of Appendix I-D). It is recommended that all intersection analyses be revised to reflect the cycle lengths and phasings from existing signal timing sheets. Future year analyses should maintain cycle lengths and phasings, although splits may be optimized to reflect different green time needs due to traffic volume changes.

### **Chapter 2, Section 8 – Weekend Review**

- 13)The text provided for the Weekend Review (page 94 of the PDF) indicates that no further review of weekend conditions is needed based on the findings. However, no specific findings are written in support of this statement. Please provide additional details concerning the weekend evaluation to justify not analyzing weekend conditions further. For example, a comparison of ADM and Graham Property project volumes for a typical weekday and weekend should be provided; a comparison of total traffic volumes for a weekend and weekday should be included; and an assessment of directional volume changes that may impact SIS facilities and nearby interchanges in a manner different from what is experienced currently.

### **Chapter 1, Section 6 –Existing Conditions**

- 14)In section 6.2, the PHP is defined as the average of the two highest consecutive hours of traffic and defined as the average of traffic volume between 7-9 AM and 4-6 PM. Are these the highest consecutive hours of traffic for all links? The two highest consecutive hours should be determined from traffic counts and defined for SIS facilities, Turnpike facilities, Other State Facilities, and County Facilities separately. This methodology should be consistent with the Interchange Access Request methodology.

### **Chapter 1, Section 7 - Trip Generation**

- 15)The Department does not dispute the 10.8% LRT adjustment to net external trips which was previously approved as part of the methodology and shown in Table I-9. However, the calculation of the LRT adjustment should be reviewed. If 10.8% of person trips to MOA took LRT then this 10.8% should be applied to the person trips visiting ADM. Assuming a vehicle occupancy of 2.3 for ADM to match the vehicle occupancy of MOA then 69,822 daily net external vehicle trips translates to 160,591 person trips. To add the 10.8% back divide 160,951 person trips by  $1 - .108 = .892$  so 180,438 person trips to American Dream Mall. Converting back to vehicle trips with a 2.3 auto occupancy gives 78,451 vehicle trips. The difference between 78,451 and 69,822 vehicle trips is 8,629 additional vehicle trips. Please clarify the difference between the 8,629 vehicle trips calculated vs. the 6,481 vehicle trips provided in Table I-9.



- 16) In the Addendum to TIA Methodology for CDMP (Nov. 24, 2015) PM internal capture was 15.1% in 2020 and 10.8% in 2040 for the Graham project, but the current analysis shows 24.48% in 2020 and 18.38% in 2040. Unless otherwise approved, use the same internal capture rates that were previously approved in the methodology.

### **Chapter 1, Section 8 – Background Conditions**

- 17) Florida's Turnpike from I-595 to Pines Blvd in Broward County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Broward MPO 2040 LRTP. The identified source in Table I-12 is the SERPM7.0 model. The model is a tool and should not be used as a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.
- 18) Okeechobee Road from NW 154<sup>th</sup> St to Florida's Turnpike in Miami-Dade County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Miami-Dade MPO 2040 LRTP. The identified source in Table I-12 is the SERPM 7.0 model. The model is a tool and should not be used as a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.
- 19) SERPM 7.0 model is identified as a source for three projects in Table I-12 but the methodology identified SERPM 6.5/Managed Lanes PD&E model, plus Turnpike edits for their planned future projects, plus the approved SERPM 7 socioeconomic data integrated in. Please clarify which model was used for this analysis.
- 20) Section 8.3 indicates that growth rate caps were imposed on all facilities. In the approved methodology no growth rate cap was included. Please clarify in the report how and why the growth rate caps were determined, and provide any numerical support of this determination.
- 21) Page 48, Table I-14: Please label and explain the difference between the 1<sup>st</sup> and 2<sup>nd</sup> columns labeled as "Referenced Intersection % Growth". It appears in the Appendix that there are two sets of intersection growth rates for the two Phases (Phase I and Phase II). Please define the Phases in a footnote and label the column appropriately.



22) Page 53-54, Table I-16: Please check for missing intersections and revise as necessary. Only Intersections 16 through 54 are provided.

### **Chapter 1, Section 9 - Project Trip Distribution**

23) Socio-economic data was factored to match the daily ITE trip generation calculations for the external trip quantities. How was this performed? The model plots show % trips from the select zone analysis but not the model volumes in Appendix I-M. Please include model volume plots for this select zone analysis.

24) Please provide the methodology for determining the number of households with and without children and vehicle ownership for the Graham Property households where there were not households previously.

25) Consistent with the traffic methodology, a new TAZ was created for ADM to force access to HEFT and NW 170<sup>th</sup> Street. There appears to be a centroid connector near the HEFT and NW 170<sup>th</sup> Street in the submitted material, though it is not identified as an ADM TAZ and the percent distribution is not depicted. When adding the percent trips on the centroid connectors for the ADM TAZ in Appendix I-M, the percentage sums to only 70% indicating that the other 30% is distributed from the new centroid. Please identify the number of the TAZ added near HEFT and NW 170<sup>th</sup> Street and what socio-economic data was assigned. The table in Appendix I-L should be updated to reflect this TAZ. Additionally, please denote the TAZ with a star for ADM on the map in Appendix I-L.

26) Please include model plots from the newly created ADM TAZ near the HEFT and NW 170<sup>th</sup> St interchange showing the select zone analysis in both model volumes and percent of project traffic volumes. This will serve as a check that this methodology for matching the expected regional long distance trip making characteristics works as intended.

27) On page 63, a typographical error was noted. References to Table I-8 and Table I-9 should be changed to Table I-9 and Table I-10 instead.

### **Chapter 1, Section 10 – Project Assignment**

28) Page 58, 60, and 62, Figures I-10B, 11B, and 12B: Please explain why no traffic to/from the Graham Project is assigned for the link of NW 170<sup>th</sup> Street from NW 102<sup>nd</sup>

Avenue/NW 107<sup>th</sup> Avenue to NW 97<sup>th</sup> Avenue, particularly since there is an access point at the location of NW 102<sup>nd</sup> Avenue/NW 107<sup>th</sup> Avenue. The 0.0% value is present for both 2020 and 2040 project distributions.

29)Page 58, 60, and 62, Figures I-10B, 11B, and 12B: Please explain why no traffic is assigned to/from the link of NW 170<sup>th</sup> Street from NW 82<sup>nd</sup> Avenue to NW 78<sup>th</sup> Avenue when both the links to the east and west have project traffic assigned to them.

30)Page 63, Table I-17: Please check the percent distribution values for the link of NW 178<sup>th</sup> Street between Graham Access and NW 97<sup>th</sup> Avenue. The values do not match those shown in Figure I-10B.

#### **Chapters 2 through 4 – Link Analysis**

31)The use of ADM or Graham Property traffic should not be included as “background” traffic in the analysis when determining if a facility is backlogged. The determination of backlogged facilities must be re-done to include only approved background traffic. Throughout the submitted analysis, it is stated that backlogged facilities include traffic generated by either ADM or Graham Property, depending on which project was being analyzed. This means that links which fail due to trips from Graham property or ADM are considered backlogged and not subject to mitigation. This approach to evaluating backlogged facilities is included in the Zoning Link Analysis and CDMF analysis tables in Chapters 2 through 4. Below are examples of roadways identified as backlogged facilities (and failing) because of either ADM or Graham Property traffic.

- a. *I-75 from Miramar Parkway to Florida’s Turnpike (Table III-5A)*
- b. *I-75 from Miramar Parkway to Florida’s Turnpike (Tables II-5B and III-5B)*
- c. *I-75 from Florida’s Turnpike to Miami Gardens Drive (Tables II-5B and III-5B)*
- d. *Okeechobee Road from Hialeah Gardens to NW 103rd Street (Tables II-5B and III-5B)*
- e. *Okeechobee Road from NW 103rd Street to SR 826 (Tables II-5B and III-5B)*
- f. *Miami Gardens Drive from I-75 Eastern Ramps to NW 87th Avenue (Tables II-2B and III-2B - )*
- g. *Miami Gardens Drive from NW 87th Avenue to NW 82nd Avenue (Tables II-2B and III-2B)*



32)It was noted in several tables in Chapter 4, particularly Tables VI-5A, VI-5B, and VI-6B, that two segments of I-75 fail in 2020 and 2040 because of ADM and Graham Property traffic. Yet these two segments (I-75 from Miramar Parkway to Florida's Turnpike, and I-75 from Florida's Turnpike to Miami Gardens Drive) are not listed in Mitigation Summary sections or the Executive Summary of the report. Planned improvements to both I-75 segments will increase capacity to accommodate background growth traffic through 2040 and allow the roadway to operate at an acceptable level of service. However, the addition of ADM and Graham Property traffic causes these I-75 segments to fail, according to the submitted analysis. As a result, please identify the necessary improvements for these two I-75 segments to allow them to operate at an acceptable level of service with both project's traffic, and include these improvements under each Mitigation Summary section of the report.

33)In Chapters 2 through 4, the volumes and lane geometries for various roadway segments for the 2020 and 2040 Zoning and CDMP analysis tables differ. When comparing Table II-5A (2040 CDMP Analysis) with Table II-6A (2040 Zoning Analysis) the total trips for a particular roadway segment are not the same. In some cases, the number of lanes (CF + proposed) are different. For example, SR 826 shows 10 lanes in the zoning analysis for 2040 and 10+4/12+4 in the CDMP analysis for 2040. Also, the segment of Florida's Turnpike from SW 8<sup>th</sup> Street to SR 836 was assigned 311 combined northbound trips for the 2040 PM peak hour CDMP analysis, but only 307 combined northbound trips for the 2040 PM peak hour Zoning analysis.

Please clarify the apparent project trip assignment and roadway geometry inconsistencies and revise the analyses, as appropriate.

34)The Mitigation Summary in each chapter does not include intersection mitigation. Please add the intersection mitigation summary to this section. This summary is included in the executive summary but does not differentiate between Graham and ADM responsibilities.

35)Please revise the analysis of backlogged facilities such that ADM and Graham Property project traffic are not considered as background traffic. In the Intersection ADM Mitigation Summary appendices (II-I, II-J, III-H, III-I), items that are significant are highlighted in yellow. In some cases (e.g., NW 186<sup>th</sup> Street / Miami Gardens Drive & NW 67<sup>th</sup> Avenue) mitigation is proposed for turning movements, which includes traffic impacts from both ADM and Graham Property. Intuitively, if both projects

contribute significant traffic impacts to a turning movement requiring mitigation, then the mitigation costs should be shared between the two developments. Please clarify how the projects included in the intersection needs of the executive summary were determined to be significantly impacted by ADM and Graham Property developments.

- 36) In comparing Table II-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – ADM Impacts and III-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – Graham Impacts, the LOS with both ADM and Graham Property included do not match. Given that this column should include all trips from both projects, it is expected that the LOS would be the same. Please correct the apparent discrepancy.
- 37) Page 83, Table II-4 and Page 112, Table III-4: Please check LOS values for Intersection ID 9 (NW 67<sup>th</sup> Avenue at Miami Gardens Drive), and explain why this intersection operates better with the additional project trips than with just the background traffic only.
- 38) Page 95, Table II-7 and Page 156, Table IV-7: Please check LOS values for Intersection ID 16 (SR 823/Red Road at Turnpike Ramp (E)), and explain why this intersection operates better with the additional project trips than with just the background traffic only.
- 39) Table II-7 is included in both Chapters 2 and 3. Chapter III is specific to the Graham property but the Table II-7 states it is for the ADM impacts. The table appears to be identical including the headers of the table. Please replace Table II-7 in Chapter III with the correct Table III-7.
- 40) Table II-7 states “Zoning Short Term (Year 2040).” Please change to “Zoning Long Term (Year 2040).”

## **Chapter 2, Section 8 – Mitigation Summary**

- 41) Page 127, Second Paragraph (sentence before bulleted list): Please clarify if the listed improvements are for the ADM and/or Graham Project. ADM is referenced twice in the noted sentence. This also occurs again on Page 149 in the same location under Section 6.0 Mitigation Summary.



### **Chapter 3, Section 5 – Year 2040 AM and PM Zoning Analyses**

42)Page 116 – 119, Tables III-5A & 5B: Please check for an error in the font color for columns under Background Trips Peak Hour Peak Dir Analysis NB/EB (Vol/LOS). Not all values in red font are failing.

### **Missing Tables**

43) There appear to be several tables missing from the submittal package (see cursory list below). Please revise the report to include all summary tables.

- a. The first half of Table II-3B is missing.*
- b. The first half of Table II-5A is missing.*
- c. The first half of Table II-6B is missing.*
- d. Table III-5B should be renamed "Table II-5B" to be consistent with the report's naming conventions.*
- e. The first half of Table III-3B is missing.*
- f. The first half of Table III-6A is missing.*

### **General Synchro Comments**

44)After reviewing the output from the Synchro analyses there are some discrepancies in the inputs used for the existing and future conditions.

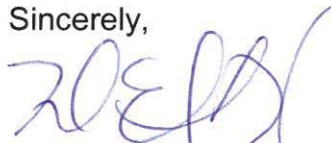
- a. The peak hour factor for all intersections/approaches was used the default value. Was this discussed and agreed upon during the methodology agreement?*
- b. Cycle length/offsets and minimum initial (minimum green) did not correspond to Miami Dade County Signal Systems TOD sheets. Also please provide the Signal Timing sheets used as reference for the Synchro inputs within the appendix area.*
- c. It is not possible to verify the truck percentage used in the analyses due to the output sheets provided. It is important to account for this input in the Synchro analyses. Please provide both the methodology and process for how the truck percentage was chosen for the approaches or intersections and provide the appropriate HCM output from Synchro.*



- d. *For the reference (yield) point, "beginning of green" is used for actuated-coordinated intersections. Was this verified with the Miami Dade County area engineer for these signals? Typically, the majority of signals in the County have a reference point of "beginning of yellow" for the main movements. Please check data and update the analyses with the correct input.*
- e. *Some intersections between the existing conditions and future analyses get switched from actuated-coordinated operation to uncoordinated in the future. Please clarify the reason for this change.*
- f. *For the future analyses, was the signal timing optimized for the "without mitigation" and the "with mitigation" scenarios? Please clarify when optimization was used and if there were any manual adjustments to the timing or other system parameters for the Synchro files.*

Please contact me at 305-470-5386, or Lisa Dykstra at 954-777-4360, if you have any questions concerning our response.

Sincerely,



Lisa Colmenares, AICP  
Planning Manager

Cc: Harold Desdunes, Florida Department of Transportation District 6  
Stacie Miller, Florida Department of Transportation District 4  
Steve Braun, Florida Department of Transportation, District 4  
Omar Meitin, Florida Department of Transportation, District 6  
Steven Craig James, Florida Department of Transportation, District 6  
Lisa Dykstra, Florida Department of Transportation, District 4  
Isabel Cosio Carballo, South Florida Regional Council

## Stillings, Noel (RER)

**From:** Samson, Kim C. <Kim.Samson@dot.state.fl.us>  
**Sent:** Friday, August 26, 2016 4:57 PM  
**To:** Stillings, Noel (RER)  
**Cc:** Stettner, Alison; Colmenares, Lisa  
**Subject:** RE: Comments for the Graham/ADM Applications

Hi Noel,  
As discussed, after briefly reviewing the material provided (to me) this week -

The County can consider the District's comments representative of important Turnpike input as well, with regard to the applicant's submittal.

A couple of additional Turnpike facility specific comments are provided below:

- Turnpike projects on the Homestead Extension of Florida's Turnpike (HEFT), south of SR 836 (inclusive of managed Express Lanes) are let for construction (Design-Build). The analysis should include these projects.
- Turnpike has additional count/toll information available which is not included in the FDOT FTI. The availability of this information was shared with the applicant during the methodology meetings but was not requested by the applicant for the preparation of the analysis.
- HEFT, in the project vicinity, has sustained considerable growth rates (with the exception of recession years). The calculated annualized growth rate (which included recession years) from 2000 – 2015 is 3.5% north of SR 836 and 3.0% south of SR 836. The development of growth rates for this facility should be assessed independently of the other limited access facilities. Information from the Turnpike's Annual evaluation is provided below for information/reference.

If additional Turnpike comments should be noted, time permitting I will forward to you or bring to meeting on Sept 9.

Regards,  
Kim

### North of SR 836

Weighted Average Growth Rate											
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	
45,400	51,100	53,800	59,700	64,600	68,500	71,900	75,200	74,600	73,000	75,500	
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012
12.6%	5.3%	11.0%	8.2%	6.0%	5.0%	4.6%	-0.8%	-2.1%	3.4%	0.9%	2.9%

### South of SR 836

Weighted Average Growth Rate											
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	
48,700	53,300	55,600	60,300	70,300	77,400	81,100	82,200	76,900	72,600	74,300	
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012
9.4%	4.3%	8.5%	16.6%	10.1%	4.8%	1.4%	-6.4%	-5.6%	2.3%	2.6%	2.8%

**Kim Samson, PE, PTOE**

Project Manager, Planning Traffic Engineering  
FTE - Traffic & Revenue Engineering Consultants

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Florida's Turnpike Enterprise

Pompano Operations Center

P.O. Box 9828

Ft. Lauderdale, FL 33310

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**From:** Stillings, Noel (RER) [mailto:stillin@miamidade.gov]

**Sent:** Tuesday, August 23, 2016 1:36 PM

**To:** Samson, Kim C.

**Subject:** FW: Comments for the Graham/ADM Applications

Good afternoon Kim,

Seems like we got disconnected – sorry but my phone did not list what number you called in on, so I'm emailing you back.

As we discussed, here are the comments we received from FDOT about the ADM/Graham applications (Application Nos. 5 and 6 in our May 2016 CDMP Cycle).

Let us know, or if your Planning Manager can let us know, if you will have any comments on the applications.

I have also included the Advance Notification package we received for the HEFT/NW 170 Street Interchange, with that Beacon Countyline reference.

Regards,

Noel Stillings, Senior Planner

**Planning Division, Metropolitan Planning Section**

**Miami-Dade County Department of Regulatory and Economic Resources**

111 NW 1st Street, 12th floor, Miami, Florida 33128

**Internal line: 500-5130 / Phone: (305) 375-2835**

North of SR 836

Weighted Average Growth Rate																	Trend	'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015			
45,400	51,100	53,800	59,700	64,600	68,500	71,900	75,200	74,600	73,000	75,500	76,200	78,400	77,900	81,400	89,600	52,051	87,549	3.5%
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015				
12.6%	5.3%	11.0%	8.2%	6.0%	5.0%	4.6%	-0.8%	-2.1%	3.4%	0.9%	2.9%	-0.6%	4.5%	10.1%				

South of SR 836

Weighted Average Growth Rate																	Trend	'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015			
48,700	53,300	55,600	60,300	70,300	77,400	81,100	82,200	76,900	72,600	74,300	76,200	78,300	80,400	83,700	90,500	56,598	88,627	3.0%
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015				
9.4%	4.3%	8.5%	16.6%	10.1%	4.8%	1.4%	-6.4%	-5.6%	2.3%	2.6%	2.8%	2.7%	4.1%	8.1%				



Environmental Protection and Growth Management Department  
**PLANNING AND DEVELOPMENT MANAGEMENT DIVISION**

115 S. Andrews Avenue, Room 329K • Fort Lauderdale, Florida 33301 • 954-357-6634 • FAX 954-357-8655

September 1, 2016

Mark R. Woerner, AICP  
Assistant Director for Planning  
Dept. of Regulatory and Economic Resources  
111 NW 1st Street, 12th Floor  
Miami, FL 33128-1902

**RE: American Dream Miami and Graham Property**

Dear Mr. Woerner:

Thank you for the opportunity to provide comments on the proposed development of American Dream Miami (ADM) and the Graham Property, in northwest Miami-Dade County. Broward County staff has reviewed the revised Traffic Impact Analysis submitted with the two applications for amendment to the Miami-Dade Comprehensive Development Master Plan (CDMP).

Based on our review, staff has the following comments which we request that the applicant specifically address in their resubmittal to Miami-Dade County:

1. It is unclear how the 10.8-percent upward adjustment for light rail transit (LRT) resulted in the addition of 6,481 daily trips and 491 PM peak hour trips. These values do not agree with our calculations. Please provide a worksheet outlining the LRT adjustment calculations and please provide backup for any assumptions accepted for this adjustment.
2. It is maintained in the study that the hotel component is an ancillary/complementary land use and was reflected in the trip generation estimates for ADM derived from count data collected at Mall of America (MOA). It was further stated in a reply to a previous comment about the hotel component that the ADM site is not near other Miami-Dade attractions such as the beaches or airport and therefore is not expected to generate trips other than visitors to ADM. In response to the ancillary/complementary land use comment, MOA has 506 rooms on-site to accommodate approximately 4,400,000 square feet (SF) of gross floor area (GFA), or about one room per 8,700 SF of GFA. ADM is proposed to have 2,000 rooms for 6,200,000 SF of GFA which equates to one room per 3,100 SF of GFA. Proportionally, ADM will have 2.8 times more hotel rooms per SF of GFA than MOA and accordingly, it is not reasonable to expect that all guests will be visiting the hotels as an ancillary use of ADM. With regard to the response that the location of ADM is not near other Miami-Dade attractions, it should be noted that there are at least four hotels comprising over 500 hotel rooms in the Miami Lakes Main Street area, located within two to three miles of the site, also similarly remotely located from the airport and



beaches. Therefore, it is not a reasonable assumption that the project's hotels will not generate trips other than ancillary to ADM. Furthermore, as the area develops with other planned and committed projects, the demand for hotel rooms will increase. For the above reasons, we continue to recommend that an adjustment to trip generation be made to account for hotel visits not specifically associated with ADM.

3. The analysis shows that Miramar Parkway west of I-75 operates at Level of Service (LOS) C and will continue to do so for future conditions. This was brought up in our previous comments and the response was that the analysis was based on 2014 traffic count data. 2015 traffic counts for the intersection of Miramar Parkway and Dykes Road/SW 160 Avenue (Attachment A) indicating that Miramar Parkway is currently operating overcapacity. Furthermore, Synchro analysis (Attachment B) shows that during the PM peak, the intersection of Miramar Parkway and Dykes Road operates at LOS F.
4. During the review meeting held at SFRC on January 22, 2016, there was discussion of extending transit to this site and construction of park and ride facilities. Whist Miami-Dade Transit will be the primary service provider, staff would encourage the applicant to explore option for transit service north of the site with Broward County Transit. Transit riders are likely to employees working in retail, hotel and park components of the project. South Broward County has many residential neighborhoods which would be included in the future labor pool.

I look forward to continuing to work with you and your staff as this development project moves though the development review process. In the event that mitigation is proposed in Broward County, I would like to coordinate with your staff and our attorneys to develop appropriate, enforceable, agreements that will ensure the installation of required improvements outside Miami-Dade County.

Please let me know if you have questions about these comments. I can be reached at (954) 357-6602 or [jsesodia@broward.org](mailto:jsesodia@broward.org).

Sincerely,



Josie P. Sesodia, AICP  
Director

Attach (2)

CC: Bertha Henry, County Administrator  
Henry Sniezek, Director, EPGMD  
Tony Hui, Deputy Director, Public Works Dept.  
Scott Bruner, P.E., Director, Traffic Engineering Division

2300 W. Commercial Blvd.

Fort Lauderdale, FL 33309

SIGNAL: 3472  
 CITY: MIRAMAR  
 LOCATION: MIRAMAR PKWY & DYKES RD/SW 160 AVE

File Name : 3472\_05052015  
 Site Code : 00000000  
 Start Date : 5/5/2015  
 Page No : 1



































## Groups Printed- Unshifted

	DYKES RD Northbound					DYKES RD Southbound					MIRAMAR PARKWAY Eastbound					MIRAMAR PARKWAY Westbound					
Start Time	Right	Thru	Left	Peds	App. Total	Right	Thru	Left	Peds	App. Total	Right	Thru	Left	Peds	App. Total	Right	Thru	Left	Peds	App. Total	Int. Total
07:00 AM	99	80	41	0	220	4	39	142	0	185	0	275	7	0	282	100	165	55	0	320	1007
07:15 AM	114	66	50	0	230	18	77	156	0	251	2	337	9	0	348	143	190	62	0	395	1224
07:30 AM	125	78	53	0	256	8	46	195	0	249	20	315	18	0	353	162	178	54	0	394	1252
07:45 AM	138	66	42	0	246	8	64	215	0	287	42	441	26	0	509	223	182	81	0	486	1528
Total	476	290	186	0	952	38	226	708	0	972	64	1368	60	0	1492	628	715	252	0	1595	5011
08:00 AM	144	33	25	0	202	11	52	190	0	253	20	363	22	0	405	214	159	90	0	463	1323
08:15 AM	115	40	16	0	171	6	84	167	0	257	9	296	24	0	329	172	195	86	0	453	1210
08:30 AM	69	35	16	0	120	5	85	191	0	281	12	288	30	0	330	143	154	79	0	376	1107
08:45 AM	78	53	31	0	162	4	47	138	0	189	16	300	26	0	342	184	198	117	0	499	1192
Total	406	161	88	0	655	26	268	686	0	980	57	1247	102	0	1406	713	706	372	0	1791	4832
*** BREAK ***																					
11:00 AM	54	54	15	0	123	19	24	42	0	85	13	167	39	0	219	73	189	43	0	305	732
11:15 AM	49	50	16	6	121	22	28	51	0	101	12	250	52	0	314	105	191	37	0	333	869
11:30 AM	31	40	11	0	82	26	35	52	0	113	14	183	49	0	246	86	151	25	0	262	703
11:45 AM	54	36	25	0	115	23	27	160	0	210	14	202	47	0	263	131	219	42	0	392	980
Total	188	180	67	6	441	90	114	305	0	509	53	802	187	0	1042	395	750	147	0	1292	3284
12:00 PM	47	47	20	0	114	27	48	149	0	224	13	230	54	0	297	166	204	42	0	412	1047
12:15 PM	35	38	15	0	88	42	31	159	0	232	14	227	46	0	287	144	193	30	0	367	974
12:30 PM	46	58	16	0	120	39	45	189	0	273	15	186	78	0	279	183	206	52	0	441	1113
12:45 PM	34	40	25	0	99	35	55	192	3	285	16	275	61	0	352	146	211	52	0	409	1145
Total	162	183	76	0	421	143	179	689	3	1014	58	918	239	0	1215	639	814	176	0	1629	4279
*** BREAK ***																					
04:00 PM	75	46	32	0	153	68	84	171	0	323	34	254	63	0	351	243	381	81	0	705	1532
04:15 PM	97	41	30	0	168	77	75	206	0	358	34	231	45	0	310	255	384	89	0	728	1564
04:30 PM	168	44	68	0	280	74	79	128	4	285	38	237	35	0	310	182	363	112	0	657	1532
04:45 PM	225	88	104	0	417	48	81	152	8	289	36	265	57	0	358	216	412	79	0	707	1771
Total	565	219	234	0	1018	267	319	657	12	1255	142	987	200	0	1329	896	1540	361	0	2797	6399
05:00 PM	230	144	91	0	465	75	62	224	0	361	43	233	42	0	318	260	397	101	0	758	1902
05:15 PM	215	132	48	0	395	49	56	282	4	391	29	260	53	0	342	222	460	110	0	792	1920
05:30 PM	212	120	75	0	407	81	161	215	4	461	34	257	51	0	342	242	446	82	0	770	1980
05:45 PM	232	129	79	0	440	62	95	264	2	423	34	233	61	0	328	251	459	94	0	804	1995
Total	889	525	293	0	1707	267	374	985	10	1636	140	983	207	0	1330	975	1762	387	0	3124	7797
Grand Total	2686	1558	944	6	5194	831	1480	4030	25	6366	514	6305	995	0	7814	4246	6287	1695	0	12228	31602
Apprch %	51.7	30	18.2	0.1		13.1	23.2	63.3	0.4		6.6	80.7	12.7	0		34.7	51.4	13.9	0		
Total %	8.5	4.9	3	0	16.4	2.6	4.7	12.8	0.1	20.1	1.6	20	3.1	0	24.7	13.4	19.9	5.4	0	38.7	

## Queues

## 3472: Dykes Rd &amp; Miramar Pky

9/1/2016

												
Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	 	  		 	  		 	 		 	 	
Traffic Volume (vph)	207	983	140	387	1762	975	293	525	889	985	374	267
Future Volume (vph)	207	983	140	387	1762	975	293	525	889	985	374	267
Satd. Flow (prot)	3433	5085	1583	3433	5085	1583	3433	3539	1583	3433	3539	1583
Flt Permitted	0.950			0.950			0.950			0.950		
Satd. Flow (perm)	3433	5085	1583	3433	5085	1583	3433	3539	1583	3433	3539	1583
Satd. Flow (RTOR)			152			372			212			193
Lane Group Flow (vph)	225	1068	152	421	1915	1060	318	571	966	1071	407	290
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm	Prot	NA	Perm
Protected Phases	1	6		5	2		7	4		3	8	
Permitted Phases			6			2			4			8
Total Split (s)	25.0	81.0	81.0	25.0	81.0	81.0	25.0	39.0	39.0	35.0	49.0	49.0
Total Lost Time (s)	4.0	5.0	5.0	4.0	5.0	5.0	4.0	5.0	5.0	4.0	5.0	5.0
Act Effect Green (s)	21.0	76.0	76.0	21.0	76.0	76.0	20.2	34.0	34.0	31.0	44.8	44.8
Actuated g/C Ratio	0.12	0.42	0.42	0.12	0.42	0.42	0.11	0.19	0.19	0.17	0.25	0.25
v/c Ratio	0.56	0.50	0.20	1.05	0.89	1.20	0.83	0.85	2.06	1.81	0.46	0.54
Control Delay	81.1	39.0	4.7	132.5	54.6	130.3	96.2	83.8	506.7	409.7	59.6	23.0
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	81.1	39.0	4.7	132.5	54.6	130.3	96.2	83.8	506.7	409.7	59.6	23.0
LOS	F	D	A	F	D	F	F	F	F	F	E	C
Approach Delay		42.0			87.9			306.1			265.7	
Approach LOS		D			F			F			F	
Queue Length 50th (ft)	131	336	0	~278	765	~1248	191	348	~1585	~977	218	98
Queue Length 95th (ft)	181	382	48	#396	830	#1520	#253	#427	#1857	#1115	276	204
Internal Link Dist (ft)		1200			1472			1680			1712	
Turn Bay Length (ft)	330		275	400		250	300		300	320		400
Base Capacity (vph)	400	2147	756	400	2147	883	400	668	470	591	881	538
Starvation Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.56	0.50	0.20	1.05	0.89	1.20	0.80	0.85	2.06	1.81	0.46	0.54

## Intersection Summary

Cycle Length: 180

Actuated Cycle Length: 180

Offset: 141 (78%), Referenced to phase 2:WBT, Start of Yellow

Control Type: Actuated-Coordinated

Maximum v/c Ratio: 2.06

Intersection Signal Delay: 165.0

Intersection LOS: F

Intersection Capacity Utilization 113.8%

ICU Level of Service H

Analysis Period (min) 15

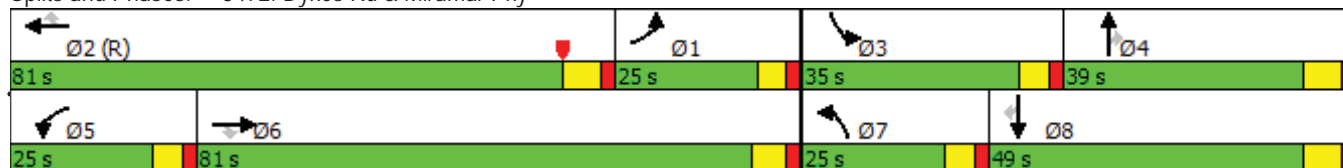
~ Volume exceeds capacity, queue is theoretically infinite.

Queue shown is maximum after two cycles.

# 95th percentile volume exceeds capacity, queue may be longer.

Queue shown is maximum after two cycles.

Splits and Phases: 3472: Dykes Rd &amp; Miramar Pky



COMMENTS ON THE  
AMERICAN DREAM MIAMI (ADM) AND THE GRAHAM COMPANIES  
REVISED TRANSPORTATION IMPACT ANALYSIS (TIA) REPORT  
DATED JUNE 22, 2016  
BY THE MIAMI-DADE COUNTY DEPARTMENT OF TRANSPORTATION AND PUBLIC  
WORKS, (DTPW) TRAFFIC ENGINEERING DIVISION  
DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES, (RER) PLANNING AND  
PLATTING DIVISIONS

SEPTEMBER 7, 2016

**DTPW COMMENTS**

1. Executive Summary: Please explain the 220 various scenarios listed for the intersection analyses. It would appear that only 18 scenarios would be required, 9 alternatives for both AM and PM Peak Hours: 1-Existing, 2 & 3 - Future No-Build (2020 & 2040), 4 & 5- ADM Alternative Only (2020 & 2040), 6 & 7 - Graham Project Alternative Only (2020 & 2040), 8 & 9 – Total Combined Projects (2020 & 2040).
2. Section 1-Overview: What is the difference in the CDMP versus the Zoning analyses? From a traffic analysis perspective, the concern mainly exists with the worst-case scenarios. Please advise.
3. Figure I-3 through 6: Please zoom into the study area and identify the highlighted roadway segments with their street names.
4. Section 6.2-Existing Roadway Link Directional PHPs: Please clarify and provide an example for the following statement:  
  
*“For the MDC counts, the PHPs were ratio’ed to the official PHPs identified by the County in its count reports and the directional distributions observed from the raw counts were then used to derive northbound/eastbound (NB/EB) and southbound/westbound (SB/WB) PHP directional volumes.”*
5. Section 6.3-Existing Roadway Link Directional LOS: Please provide the data assumptions for the roadway segments used to determine the maximum service volume thresholds. Also, there were no FDOT tables included in Appendix I-C, only Intersection TMCs.
6. Table I-4: The PM LOS is missing for ID #10. Also, please show the intersection delays for all the LOS Summary tables throughout the report.
7. Table I-10: The Diverted Trip to Retail Use volumes which were calculated from the ITE Trip Generation Handbook Pass-by Trip volumes for Land Use Code 820 are only valid for the PM Peak Hour since the data was collected for a weekday during the PM Peak Period. No diverted trips should be calculated for the Daily or AM peak analysis. Furthermore, caution should be exercised when using the pass-by fitted curve equation in lieu of non-pass-by trip data as listed in Table F.9 from the ITE Handbook, which includes diverted trip percentages.
8. Table I-10, Note 2: This states that “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.” The table shows the net external trips with the pass-by reductions. Please advise if the pass-by trips were reduced only for the existing roadway

facilities. The traffic at the sites' driveways and new roadways must show 100% trips as these are all new.

9. Section 8.3-Background Growth: According to ITE Transportation Impact Analysis for Site Development, growth rates should not normally be employed for horizons beyond 4 to 5 years (i.e. through 2020) because of the variability in growth rates over time and the magnitude of error that can result from a relatively small error in the growth rate over a long period of time (such as using these to generate 2040 volumes).
10. Table I-16: the first half is missing for ID # 1-15.
11. Figures I-10A through 12B: Please explain the major differences in the project distribution percentages between the Zoning and CDM analyses. For example, the ADM Project Distribution on Figure I-11B is 23.41% for the north-south 4-lane segment near the Graham project. This same link however, is listing a 43.19% ADM Project Distribution in Figure I-12B. Otherwise, most of the percentages are similar to their counterparts as compared in the figures.
12. Section 10-Project Assignment: The diverted trips for the TMVs shown are not shown in detail in Appendix I-K. Please include separate figures to show these volumes.
13. Table IV-7: This table is numbered IV but should be sequentially numbered VI. Also, this is titled 'Zoning Short Term (Year 2040)' but should be Long Term. Also, please confirm that the signal cycle lengths used in the future analyses were the same as existing. Any deviation from these needs to be documented.
14. Mitigation Summary (all scenarios): Please ensure that the future LOS intersection analyses does not include improvements at the intersections, such as additional/increased turn bay storages, signal optimization, etc. A comparison of the Future No-Build and Build scenarios needs to be evident. A separate LOS analysis should be made for those intersections requiring mitigation. Also, were there any unsignalized intersections that were identified for signalization in the future?
15. Appendix I-K1: Some of the turning movement volumes do not appear to be adding up correctly. For example, assuming a 1% growth rate from existing to 2020, the background volumes for the AM WB through movement at NW 87<sup>th</sup> Avenue and Miami Gardens Drive should be 1,544; and then adding the ADM and Graham project trips should result in 1,637 instead of 1,621. Please clarify. Also, why are the peak directions different for the two projects during the same peak period?

## **RER COMMENTS:**

### **General Comments**

1. For each application, include a proportionate share analysis that identifies the applicant's fair share of the cost of the required transportation improvements.
2. Number all of the pages in the report, including tables and maps.
3. Some pages appear to be missing, i.e. pages 54, 69, 85, 90, 97, 114, 126, 155, and 156.
4. All tables, maps, and corresponding roadway analyses must show all the roadway segments impacted by 5% or more by the projects' impact.
5. All maps and tables need to be labelled to show the major roadways and corridors, and identify all the state roadways.



6. List all roadway segments in an orderly fashion from north to south and west to east.
7. The roadway links for the existing and year 2040 should correspond to the maps.
8. Only projects listed in the Cost-Feasible Plan of the County's 2040 Long Range Transportation Plan (LRTP) should be considered for future 2020 and 2040 analysis.
9. Reference to "FDOT Comments" refers to FDOT's letter dated August 5, 2016.
10. RER staff reserves the right to provide additional comments later and will continue to finalize review of the Revised Traffic Impact Analysis (TIA).

**Page 1, Executive Summary**

11. Clarify if the 70,000 and 10,000 external trips (paragraph three) are daily or PM peak hour trips.
12. Page 4, last paragraph, clarify locations in bullet point three and four, and for any other corresponding reference to these locations.
13. Clarify the difference between the concurrency, CDMP, and zoning analyses performed.

**CHAPTER I GENERAL INFORMATION**

**Page 16, Figure I-1 Project Location and Existing Roadways**

14. Show and label all major section line roadways, with the number of lanes, for the entire Study Area.
15. Add the following missing interchanges on SR 826: NW 67 Avenue, NW 57 Avenue, and heading further east until the Golden Glades interchange.
16. Correct mislabeled "I-75" icon depicted on SR 924/Gratigny Parkway, and on all other applicable maps.

**Page 17, Figure 1-2 Preliminary Access Plan**

17. Site Plan does not show location of applicant's proposed park and ride facility for Miami-Dade Transit (MDT), please revise Site Plan to depict location of Park and Ride facility.

**Page 19, Section 5 Study Area**

18. Provide a complete listing of the roadway links depicted in Figures I-3 through I-5.
19. For Figure I-3, I-4 and I-5 label all major section line roadways and other roadway facilities that are impacted 5% or more by the projects to define the study area.
20. The 5% analysis to determine the study area boundaries for the existing, future 2020 and 2040 should include all the major section line roadways within the study area.

**Page 23, Figure 1-6 FDOT and County Count Station Map**

21. Label the corresponding roadways for the traffic count stations depicted.
22. List all the traffic counts stations, not just ones impacted by the 5% of the projects' trips.

**Page 24, Section 6.2 Existing Roadway Link Directional and Section 6.3 Existing Roadway Link Directional LOS**

23. List which peak season count factors were used.
24. Correct reference to FDOT's Generalized Table to Appendix I-E (not I-C).
25. Please consider using FDOT's synopsis reports to obtain the actual peak hour, peak direction volumes, when available.
26. Utilize the County's 3-day traffic counts.
27. Provide detailed explanation on how the directional peak hour period (PHP) volumes for the County stations were derived.

**Pages 25-27, Table I-1 Year 2015 Area Roadway Segment Existing AM and PM PHP Summary**

28. Provide copies and identify source of the 15-minute FDOT/MDC/Broward County counts.
29. Revise the table, corresponding maps and list all the roadway segments according to the identified study area, for example:
  - a. NW 107 Avenue needs to be depicted from Okeechobee Road to NW 170 Street;
  - b. SR 826/Palmetto Expressway needs to be depicted from SR 836/Dolphin Expressway to NW 27 Avenue;
  - c. Extend the analysis for the HEFT to the Mainline Turnpike;
  - d. Interstate I-75 ends at the Palmetto Expressway/SR 826, delete the roadway segment from NW 57 Avenue to LeJune as it is part of SR 924/Gratigny Parkway;
  - e. Miami Gardens Drive needs to be extended to NW 27 Avenue;
  - f. NW 138 Street ends at Okeechobee and does not continue to the HEFT;
  - g. NW 87 Avenue needs to be extended from NW 154 Street to Okeechobee Road.
  - h. NW 122 Street needs to be extended to LeJune Road;
  - i. SR 826/Palmetto Expressway needs to be extended south to SR 836/Dolphin Expressway.

**Pages 28-29, Table I-2 Existing (Year 2015) Study Area Roadway Segment LOS Analysis**

30. Identify the FDOT and County traffic count stations for the roadway segments.
31. Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds
32. Adopted LOS values need to follow the Level of Service Standards in the Transportation Element of the CDMP.

**Page 38, Table I-9 Trip Generation Summary for American Dream Miami**

33. Document the calculation used to arrive at the 6,481 Daily trips and 491 PM Peak Hour Trips based on the 10.8% LRT adjustment. RER concurs with FDOT Comment No. 15 which also questions this.

- 34. Clarify the vehicle occupancy value used to calculate the LRT adjustment
- 35. The AM/PM internal capture, although it is 0, is labeled incorrectly for each of these corresponding tables

**Page 41, Table 1-11 Future Year 2020 Roadway Improvements**

- 36. Remove NW 97 Avenue from NW 154 Street to NW 170 Street from the Year 2020 Committed Improvements list as that roadway already exists.

**Page 41, Table 1-12 Future Year 2040 Roadway Improvements**

- 37. Clarify that NW 107 Avenue from NW 138 Street to NW 170 Street and NW 102 Avenue from NW 170 Street to NW 178 Street are not part of the Cost Feasible Plan.
- 38. Remove the following from list and corresponding analysis:
  - a. Okeechobee Road from NW 154 Street to HEFT, as the Priority IV project is for grade-intersections from Krome Avenue to SR 826/Palmetto Expressway. RER concurs with FDOT's Comment No. 18 that the SERPM model is a tool and should not be utilized as a source.
  - b. NW 138 Street to SR 924 (a state road only east of I-75), and correct listing of the project as the boundaries are from the HEFT to SR 826.
  - c. HEFT – correct reference from SW 8 Street to SR 836, as that will be widened to 10 lanes, not “10+4” lanes.
  - d. SR 826/Palmetto Expressway – reference should be corrected to I-75, from NW 170 Street to SR 826.
  - e. SR 826/Palmetto Expressway – correct the future number of lanes and corresponding analysis from “10+4” to 10 lanes (will be widened from 8 to 10 lanes).
  - f. Correct other two references to “12+4” lanes on SR 826, as West Flagler Street to I-75 and I-75 north to Dade/Broward County line will be widened with express lanes to a total of 8 to 10 lanes; SR 826 from I-75 to NW 103 Street will be widened with express lanes to a total of 8 to 10 lanes; and SR 826 from NW 103 Street to Flagler street will be widened with express lanes to a total of 10 to 12 lanes.
  - g. RER concurs with FDOT Comment No. 33 regarding the listing of the “10+4” and “12+4” lanes listed for the 2040 CDMP analyses.

**Page 45 Section 8.3 Background Growth**

- 39. RER concurs with FDOT's Comment No. 20 questioning the rationale for the cap placed on growth rate. Florida's Turnpike Authority has indicated that their facilities sustained considerable growth rates, and due to this they request that independent growth rates be used for their facilities, separate from the rates used for other limited access facilities.
- 40. RER Staff emailed on January 28, 2016 a map, table and corresponding traffic reports for approved plats within the vicinity of the ADM and Graham projects. As there is no reference to usage of said information, please revise for inclusion as background growth.

**Pages 46-47, Table 1-13 Year 2020 and Year 2040 Roadway Background Future Growth Rate Summary**

41. Revise to provide analysis on the PM peak hour average of the County's traffic counts for the three-day period which provide a more comprehensive average, rather than the first day of the successive three-day count.
42. For the background analysis for both ADM and Graham, revise to omit the background traffic of the other application.

**Page 49, Section 8.5 Background Roadway Link Directional LOS**

43. Please provide information as to how the service volume values were converted into directional LOS values

**Page 50, Table I-15 Year 2020 and Year 2040 Roadway Segment Future Background AM and PM PHP Summary**

44. Revise to provide a separate column for FDOT and County vested development orders (DOS) trips, instead of including them as part of the overall background.

**Page 66, Section 10 Project Assignment**

45. RER concurs with FDOT's Comment No. 28 questioning the 0.0% trip assignment to/from the Graham project within the roadway link of NW 170 Street from NW 102 Avenue/NW 107 Avenue to NW 97 Avenue.
46. RER concurs with FDOT's Comment No. 29 questioning why no trips were assigned for the roadway link of NW 170 Street from NW 82 Avenue to NW 78 Avenue.

**Page 66, Section 9 Project Trip Distribution**

47. RER concurs with FDOT's Comment No. 23 regarding clarification of the socio-economic data and requesting inclusion of the model volume plots.

**CHAPTER II ADM FUTURE TRAFFIC IMPACTS**

48. RER concurs with FDOT's extensive Comment No. 31 that backlogged facilities should only include traffic from approved development—it should not include traffic generated by either the ADM/Graham projects.

**Page 72, Section 1.0 Year 2020 PM Concurrency Analysis**

49. Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15.

**Page 73, Table II-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-ADM PM Impacts**

50. Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment.

51. Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.
52. The values in the “Adopted LOS” column need to be consistent with the adopted CDMP Level of Service Standards in the Transportation Element.

**Page 91, Section 6 Impact Fee Assessment**

53. The response to Question 10 of the DRI analysis indicates that road impact fees are expected to be paid in the amount of \$110 million. Appendix II-A ADM Preliminary Impact Fee Analysis lists an impact fee of \$58,752,501 for ADM and an impact fee of \$7,439,278 for Graham for a total of \$66,191,779. Revise to resolve differences between the two figures.

**Page 101, Section 1.0 Year 2020 PM Concurrency Analysis**

54. Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15

**Page 102, Table III-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-Graham PM Impacts**

55. Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment
56. Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds
57. The values in the “Adopted LOS” column need to be consistent with the adopted CDMP Level of Service Standards in the Transportation Element.

**CHAPTER IV COMBINED FUTURE TRAFFIC IMPACTS**

58. Relabel Tables VI-2B, VI-3A, VI-5A, VI-5B, VI-6A, VI-6B to IV-2B, IV-3A, IV-5A, IV-5B, IV-6A, and IV-6B to be consistent with the rest of the tables in Chapter IV and listed in the table of contents.

**Page 131, Table IV-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis – Combined ADM/Graham PM Impacts**

59. Please clarify how the information provided in this table differ from the information provided in Chapters II and III, Tables II-1 and III-1 Concurrency Short Term (Year 2020).

**Pages 149 and 157, Section 9.0 Mitigation Summary**

60. Correct references in the first and second paragraph to the ADM project mentioned twice and include reference to the Graham project.
61. First paragraph, Applicant states they are working with various agencies on a “study area roadway improvement plan to include.... with development timelines.” Clarify which agencies they are working with, what formalized agreements have been entered, and provide development timelines.



62. The applicant states the previously mentioned roadway improvement plan will “accelerate several cost feasible” priorities from the County’s Adopted 2040 Long Range Transportation Plan (LRTP) into an “earlier timeline.” However, Project No. 2 (the new interchange at HEFT and NW 170 Street) is not part of the Cost Feasible Plan, but is instead listed as a private improvement. Revise to include the appropriate reference to the non-cost feasible plan and to clarify which LRTP Priority the improvements fall under, or if they are not included in the 2040 LRTP.
63. All the list of improvements with the exception of the NW 102 Avenue and NW 107 Avenue projects, were assumed to be in place by 2020. Please refer to previous comment and advise feasibility and method by which applicant proposes to advance and pay for the LRTP priorities. As noted, one project is not part of the 2040 LRTP Cost Feasible Plan, and the project on NW 170 Street from the HEFT to NW 97 Avenue is a Priority III (2026-2030).
64. Page 98 in Chapter II of the ADM Mitigation Summary Section, projects 4 and 5 in the numbered 1 through 9 list of improvements refer to the “ADM Project Access Road”, while on Page 127, Chapter III in the Graham Mitigation Summary Section, lists as project 13 and 14 the “Graham Project Access Road.” Page 149 in Chapter IV of the Combined Future Traffic Impacts lists the previously mentioned projects 4, 5, 13, and 14 as the “Graham Project Access Road” with the improvements numbered 1 through 9. Please resolve those differences.
65. Please clarify the two additional project improvements listed under “Year 2040”. Also, the improvements do not show the backlogged facilities also needing roadway improvements in order to meet acceptable LOS operating conditions.
66. Re-evaluate reference to backlogged facilities, in reference to RER previous comments under “Chapter II ADM Future Traffic Impacts.”
67. The last sentence on Page 157 states that “alternative travel modes” will be “addressed separate of this Report.” As the application is currently undergoing review, that analysis needs to be provided now.

**AMERICAN DREAM MIAMI & GRAHAM PROJECT**  
**Comprehensive Development Master Plan (CDMP) Amendment**  
**Transportation Impact Analysis (TIA) and Supporting Traffic Studies**  
**Submitted June 22, 2016**

**COMMENT SET & RESPONSES**  
**As of September 7, 2016**

**Introduction to CDMP TIA Comment Responses**

Attached are the responses to comments received from four (4) reviewing agencies and interested parties on the CDMP TIA and Supporting Studies dated June 22, 2016, with FDOT Districts 4 and 6 submitting a joint set of comments. In summary, comments were received and responded to from Florida Districts 4 and 6, Miami-Dade County Transit, the Florida's Turnpike District, and Broward County. Additionally, comments were also received from Miami-Dade County Department of Transportation and Public Works (DTPW) and Department of Regulatory and Economic Resources (RER). The applicant has not had the opportunity to fully review these comments, as of September 7, 2016, but will furnish responses following the September 9, 2016 meeting with review agencies at the South Florida Regional Planning Council (SFRPC).

The applicant has made every effort to address the agencies comments and is fully committed to working with all applicable parties to obtain final consensus on the CDMP TIA and the various supporting studies. Furthermore, the applicant is proceeding forward towards finalizing an updated version of the June 22, 2016 report that incorporates all responses addressed in this Comment Set and Responses. The intent is to resubmit the report within a reasonable time and allow the agencies to review the updated report and ensure that it has adequately accommodated all requests.

One issue which should be further elaborated on is the approach for analyzing background trips. The June 22, 2016 included the assumption that each Project was analyzed individually while considering the other Project's trips as part of the background trips and that this served as the basis for the mitigation recommendations. The request to include Graham project trips for the ADM analysis was first introduced in the Comment and Response Set dated October 16, 2015, as part of comments received from respectively FDOT, Southeast Florida Regional Planning Council, and the City of Hialeah (refer to Appendix I-A-3). Graham trips were included in the analysis presented in the December 22, 2015 CDMP TIA, following addendum to add the Graham Project to the methodology originally derived for the ADM site. As late as May of 2016, a summary of the different analysis scenarios were shared with Miami-Dade County, in part to demonstrate the extensive number of intersection and roadway segment analyses which were being prepared for the sites and to share the length of time required to complete these analyses (due in great extend to the approach of having the other Project in the background traffic and now having three separate Chapters for the ADM, the Graham, and the Combined scenarios). We stand by the analyses which was presented in the report with the statement that this was our understanding of the approach that was intended for the analyses. The applicant is amenable to work with agencies to resolve any issues of concern related to the presented approach and in an effort to make sure that all parties are comfortable with the findings is prepared to reevaluate the analyses without the other Project being included as background trips. Responses to comments on the background trip approach reflect our commitment.

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RER-PLANNING DIVISION

## FDOT DISTRICTS FOUR AND SIX, DATED AUGUST 05, 2016:

### General Comments

**FDOT No. 1:** Since ADM and Graham Property traffic analyses assume interchange improvements that affect an existing or future interchange, an Interchange Access Request (IAR) document, consistent with the *FDOT Interchange Access Request – User's Guide* will be required for each of the interchange modifications. The noted improvements affect an existing, future full interchange, or future partial interchange (Miami Gardens Drive at I-75, HEFT at I-75, a new interchange at HEFT and NW 170th Street, and a partial interchange at NW 178th Street and I-75). Additional traffic analyses beyond that submitted for the CDMP will be required to evaluate impacts upon SIS facilities and interchanges during morning, afternoon, and weekend periods, and identify improvements to accommodate the additional future traffic.

**The applicant will work with FDOT to ensure that all applicable traffic study documents are prepared as needed. The HEFT and NW 170<sup>th</sup> TIJR is already in progress and coordination is being made with the Florida's Turnpike.**

**FDOT No. 2:** Several transportation improvements projects are relied upon to demonstrate adequate public facilities are present by 2020 to accommodate the expected travel demand generated by ADM and Graham Project. These include an interchange modification at HEFT and I-75; a new interchange at HEFT and NW 170th Street; a partial new interchange at I-75 and NW 178th Street; and an interchange modification at I-75 and Miami Gardens Drive. Each of these interchange improvements ultimately requires FDOT and FHWA approval. Please note that current FHWA policy discourages partial interchange configurations and access serving private property. Although FHWA Policy Point #4 stipulates that each case is evaluated on its own merits, it is the Department's experience that obtaining approval for partial interchanges is a difficult and long process that may present scheduling challenges.

**The applicant acknowledges FDOT comment and will continue to work with the Department to ensure that these improvements are in place by the year 2020.**

**FDOT No. 2 Cont'd:** If any of the interchange improvements fail to be approved and/or constructed by 2020, the base transportation network that is the foundation of ADM and Graham Project's traffic analysis is invalid. This would result in additional transportation impacts to area roadways that were not analyzed. Therefore, it is recommended that a condition of approval be included for the ADM and Graham Project COMP submittals contingent upon obtaining the requisite FDOT and FHWA approvals for the proposed interchange access changes. If any of the relied upon transportation improvements are not approved, a re-evaluation of the traffic impact analysis will be necessary.

**The applicant acknowledges the above statements and understands that the submitted CDMP TIA has been based on the presented projects being in place. In the event that a proposed transportation improvement is not in place as planned, this may necessitate additional traffic analysis.**

**FDOT No. 3:** Please provide the electronic Synchro files so that they may be reviewed.

**The electronic Synchro files will be included once the updated *CDMP TIA and Supporting Traffic Studies* report is resubmitted accommodating the responses to agency comments, per the introductory overview.**

**FDOT No. 5:** Please add delay and v/C ratio values to all intersection LOS summary tables for ease of comparison between the various analyses conducted and for verification with the Synchro analysis. Such information is beneficial for understanding the intersection mitigation improvements if the approach and movement specific delay and LOS were provided in tabular format.

**Delay will be added to all intersection LOS summary tables, as requested. Specifically Tables I-16, II-4, II-7, III-4, III-7, IV-4, and IV-7 will be updated to include the final delay along with the overall intersection LOS results. Overall intersection volume to capacity ratios are not produced in the updated intersection results (e.g. HCM 2010, as requested). Information on approach volume to capacity ratios will be maintained within the**



## Appendices showing the individual intersection analysis outputs.

**FDOT No. 5:** Page 99, 128, & 157, Mitigation Summary, Intersection Improvements: Why were intersection improvements limited to only three variations (1 exclusive right turn lane, 3 through lanes, and 2 left turn lanes)? Each intersection depending on location and geometry should have been assessed separately. Unique lane geometries should be tested to determine what is necessary for the intersection to function at an acceptable LOS.

The mitigation limits were set to ensure that reasonable assumptions were made in regards to the potential future layout of intersections. At this point in time, there are many uncertainties in regards to what nearby land use and associated access points could exist by the time the Projects are being implemented (e.g. 2020 and 2040). Mentioned "unique" lane configurations, such as two right turn lanes or three left turn lanes, are complicated by the need to have receiving lanes to accommodate such geometries and in turn depend on numerous other supporting factors such as potentially having to merge the traffic back to its original number of receiving lanes. The most conservative and realistic approach is to set the intersection configurations to the identified maximum mitigations (e.g. 1 exclusive right turn lane, 3 through lanes, and 2 left turn lanes).

**FDOT No. 6:** Please check the page numbering of the report documents. There seems to be some skipped numbers.

The first page of several of the tables were accidentally left out when compiling the submitted June 22, 2016 CDMP TIA and Supporting Traffic Studies report. The missing pages that will be added back into the updated report are:

Page No.	Item
53	1st pg of Table I-16, Year 2020 and 2040 Background Intersection LOS Analysis
64	1st pg of Table I-17, Year 2020 SE Data on Year 2020 Roadway Network Project % Distribution & PM Trips
82	1st pg of Table II-3B, Zoning Short Term (Year 2020) Study Area Roadway Segment LOS Analysis - ADM PM Impacts
87	1st pg of Table II-5A, CDMP Short Term (Year 2040) Study Area Roadway Segment LOS Analysis - ADM AM Impacts
94	1st pg of Table II-6B, Zoning Long Term (Year 2040) Study Area Roadway Segment LOS Analysis - ADM PM Impacts
111	1st pg of Table III-3B, Zoning Short Term (Year 2020) Study Area Roadway Segment LOS Analysis - Graham PM Impacts
121	1st pg of Table II-6A, Zoning Long Term (Year 2040) Study Area Roadway Segment LOS Analysis - Graham AM Impacts

Referenced page numbers are with respect to the June 22, 2016 CDMP TIA and Supporting Traffic Studies report.

## Executive Summary

**FDOT No. 7:** There are 9 improvements, including interchange improvements at I-75/HEFT/Miami Gardens Drive, a new interchange at HEFT and NW 170th Street, and I-75 ramps at NW 178th Street to/from southbound I-75, that are assumed to be constructed by 2020. These improvements form the basis of the 2020 roadway network used for the submitted concurrency analysis, zoning analysis, and comprehensive development master plan analysis. It is suggested that these improvements be identified in the Executive Summary, and specified as roadway improvements necessary to accommodate both developments' traffic. This comment also extends to the Mitigation Summary section for Chapters 2 and 3.

The addition of the above mentioned improvements will be added to the Executive Summary and are part of the Mitigation Summaries (please also refer to response to FDOT Comment No. 41).

## Chapter 1, Section 6 - Existing Conditions

**FDOT No. 8:** In some instances, FDOT daily traffic volumes were adjusted using K and D factors to estimate peak hour, peak directional volumes for roadways. Please consider using synopsis reports for those count stations to obtain an actual peak hour, peak directional volume for the existing conditions. Such synopsis reports can be provided by FDOT upon request.

**Synopsis reports have been requested from FDOT and will be incorporated into the updated analyses.**

**FDOT No. 9:** In Appendix I-D, please include the name of the intersection in the header of all Synchro output worksheets. Also, please identify the type of analysis (HCM 2010 or Synchro 9) and results represented on each worksheet. This applies to all Synchro output worksheets provided for each scenario in each chapter of this submittal package.

**The intersection name will be included in the header for all Synchro output worksheets. As indicated in response to FDOT Comment No. 11, the outputs will be updated to represent HCM2010 results.**

**FDOT No. 10:** Page 25, Table I-1: For Segment NW 107th Avenue from NW 122nd Street to NW 138th Street, please place Note number (4) under the appropriate column. Also, it is understood that no data was available for this segment, however please explain why the assumption of an AADT of 8,000 was used. How was this value determined?

**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 the "no count" estimate is treated similar to other FDOT Daily Only counts which have K and D factors applied. 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.**

**FDOT No. 11:** Page 31, 1st Paragraph: It is stated that Synchro's HCM 2010 methodology will be used for the output results; however the results provided throughout the document and the Synchro outputs in the appendix are not of the HCM methodology. They are instead the calculated delay and LOS from the Synchro system, which does not calculate the results according to HCM. You must choose to print the HCM 2000 or 2010 version outputs within the software. Please provide the HCM output results for all existing conditions and future Synchro analysis.

**Correct, the report did state that the HCM 2010 results was being produced for the Synchro outputs. The report should have stated the Synchro results were produced. In fact for the June 22, 2016 submittal, the decision was made to reference the Synchro results in lieu of the HCM 2010 results due to the more realistic vehicular operations which are referenced in Synchro. For example, Synchro is specifically set-up to evaluate the queuing of vehicles at intersections and also has the option to include the free-flow right on red movements.**

**Since FDOT's comment specifically requests that the HCM results be included instead, the applicant will revise its approach and the newly updated CDMP TIA report will include HCM 2010 results. All intersection analyses and summary tables will be updated accordingly.**

### **Chapter 1, Section 8 - Background Conditions**

**FDOT No. 12:** Identified in Appendix I-D, unusual cycle lengths were used to analyze many of the intersections. For example, at the intersection of Florida's Turnpike ramp termini and Okeechobee Road a 133-second cycle length was analyzed for the south ramp termini intersection. However, the north ramp termini intersection was analyzed with a 80- second cycle length, even though they were evaluated as an actuated-coordinated system (See page 526 of Appendix I-D). Similarly, at Florida's Turnpike and Red Road, the west ramp termini intersection was studied with a 69.4-second cycle length, and at I-75 and Miramar Parkway, the south ramp termini intersection was analyzed with a 65.4-second cycle length (see pages 532 and 540 of Appendix I-D). It is recommended that all intersection analyses be revised to reflect the cycle lengths and phasings from existing signal timing sheets. Future year analyses should maintain cycle lengths and phasings, although splits may be optimized to reflect different green time needs due to



traffic volume changes.

**For consistency, the intersection analyses will be revised to reference the existing timings. This will be included for all future intersection analyses and results will be provided in the updated appendices and corresponding intersection summary and mitigation tables.**

### **Chapter 2, Section 8—Weekend Review**

**FDOT No. 13:** The text provided for the Weekend Review (page 94 of the PDF) indicates that no further review of weekend conditions is needed based on the findings. However, no specific findings are written in support of this statement. Please provide additional details concerning the weekend evaluation to justify not analyzing weekend conditions further. For example, a comparison of ADM and Graham Property project volumes for a typical weekday and weekend should be provided; a comparison of total traffic volumes for a weekend and weekday should be included; and an assessment of directional volume changes that may impact SIS facilities and nearby interchanges in a manner different from what is experienced currently.

**As indicated in Section 8.0, the weekend analysis is contained in Appendix II-C and includes the referenced comparison of typical p.m. weekday traffic versus Saturday peak hour of generator traffic associated with the ADM site. The analysis includes assignments on Miami Gardens Drive from I-75 Eastern Ramps to NW 87th Ave, on Florida's Turnpike/HEFT/SR 821 from US 27/Okeechobee Road to NW 170th Street, and on I-75 from Florida's Turnpike to Miami Gardens Drive. The analysis addressed all the above mentioned criteria for the weekend analysis and concluded that the weekend p.m. peak hour is the highest traffic period during the week. It was therefore determined that there was not a need to analyze all roadway segments within the study area for the weekend period and that the traditional weekday period served as the worst case traffic conditions.**

### **Chapter 1, Section 6—Existing Conditions**

**FDOT No. 14:** In section 6.2, the PHP is defined as the average of the two highest consecutive hours of traffic and defined as the average of traffic volume between 7-9 AM and 4-6 PM. Are these the highest consecutive hours of traffic for all links? The two highest consecutive hours should be determined from traffic counts and defined for SIS facilities, Turnpike facilities, Other State Facilities, and County Facilities separately. This methodology should be consistent with the Interchange Access Request methodology.

**The applicant acknowledges FDOT's comment and the County's procedure for deriving PHP volumes based on the two highest consecutive hours of the day. For the intersection turning movement counts, the field counts were based on the AM hours between 7:00 am and 9:00 am and the PM hours between 4:00 pm and 6:00 pm, the traditional highest hours of the day. As such, the existing intersection TMVs are based on an average of the field observed two-hour period counts. For consistency purposes, it is the applicants' traffic consultant's professional opinion is that it makes the most sense to use the same two-hour peak periods for all intersection and roadway segment counts are therefore recommending not to revise the approach for the development of PHP volumes.**

### **Chapter 1, Section 7 - Trip Generation**

**FDOT No. 15:** The Department does not dispute the 10.8% LRT adjustment to net external trips which was previously approved as part of the methodology and shown in Table I-9. However, the calculation of the LRT adjustment should be reviewed. If 10.8% of person trips to MOA took LRT then this 10.8% should be applied to the person trips visiting ADM. Assuming a vehicle occupancy of 2.3 for ADM to match the vehicle occupancy of MOA then 69,822 daily net external vehicle trips translates to 160,591 person trips. To add the 10.8% back divide 160,591 person trips by  $1 - 0.108 = 0.892$  so 180,438 person trips to American Dream Mall. Converting back to vehicle trips with a 2.3 auto occupancy gives 78,451 vehicle trips. The difference between 78,451 and 69,822 vehicle trips is 8,629 additional vehicle trips. Please clarify the difference between the 8,629 vehicle trips calculated vs. the 6,481 vehicle trips provided in Table I-9.

**There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the vehicle occupancy, was scrutinized to a great extent and does not warrant further review.**

**FDOT No. 16:** In the Addendum to TIA Methodology for CDMP (Nov. 24, 2015) PM internal capture was 15.1% in 2020 and 10.8% in 2040 for the Graham project, but the current analysis shows 24.48% in 2020 and 18.38% in 2040 . Unless otherwise approved, use the same internal capture rates that were previously approved in the methodology.

**The trip generation table presented in the June 22, 2016 TIA varies from the November 24, 2015 information and again was coordinated with review agencies during the early months of 2016. No further refinements are warranted at this time, as all issues related to the trip generation is considered to have been finalized.**

### **Chapter 1, Section 8 - Background Conditions**

**FDOT No. 17:** Florida's Turnpike from I-595 to Pines Blvd in Broward County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Broward MPO 2040 LRTP. The identified source in Table I-12 is the SERPM7.0 model. The model is a tool and should not be used a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.

**The model travel demand forecasts and all the Year 2040 CDMP roadway LOS tables will be updated to reflect that the Florida's Turnpike from I-595 to Pines Blvd is not widened. Table I-12 will also been updated along with all corresponding roadway link LOS analyses. Please consider this as notification to FDOT that there is an inconsistency between the 2040 Broward LRTP and the SERPM7.0 model.**

**FDOT No. 18:** Okeechobee Road from NW 154th St to Florida's Turnpike in Miami-Dade County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Miami-Dade MPO 2040 LRTP. The identified source in Table I-12 is the SERPM 7.0 model. The model is a tool and should not be used as a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.

**The model travel demand forecasts and all the Year 2040 CDMP roadway LOS tables will be updated to reflect that Okeechobee Road from NW 154th St to Florida's Turnpike is not widened. Table I-12 will also been updated along with all corresponding roadway link LOS analyses. Please consider this as notification to FDOT that there is an inconsistency between the 2040 Miami-Dade LRTP and the SERPM7.0 model.**

**FDOT No. 19:** SERPM 7.0 model is identified as a source for three projects in Table I-12 but the methodology identified SERPM 6.5/Managed Lanes PD&E model, plus Turnpike edits for their planned future projects, plus the approved SERPM 7 socioeconomic data integrated in. Please clarify which model was used for this analysis.

**In fact, the "SERPM6.5/Managed Lanes PD&E Model plus Turnpike Edits Plus the Approved SERPM 7.0 SE Data" serve as the basis for the model runs prepared for the submitted *CDMP TIA and Supporting Traffic Studies*. The only changes which have been made to the model runs were to accommodate: 1) The latest committed and cost feasible LRTP roadway improvements, 2) The planned roadway improvements as presented in the June 22, 2016 report, 3) The ADM and the Graham Projects land use data, and 4) The requested additional planned projects. The network improvements will be identified in revised Tables I-11 and I-12 presented in the updated CDMP TIA report and will include the previously referenced removal of the three SERPM 7.0 model projects (see response to FDOT Comments No. 17 and 18). The planned projects were detailed in Appendix I-L.**

**FDOT No. 20:** Section 8.3 indicates that growth rate caps were imposed on all facilities. In the approved methodology no growth rate cap was included. Please clarify in the report how and why the growth rate caps were determined, and provide any numerical support of this determination.

Correct, the methodology did not address setting a cap for the project traffic growth rates. When reviewing historical growth rates, though, there were links with both negative and extremely high growth rates. For example, Hialeah Gardens Blvd has had an average growth of 19.3 percent per year over the period 2009 through 2014. If 19.3 percent growth is maintained through the year 2040, this would equate to the traffic growing by 100 times its existing value which obviously would not be realistic. It was therefore decided to err on the conservative side and set lower growth rate percent maximum values; keeping in mind that higher growth rates would only serve to make the background traffic automatically fail. The justification is further substantiated by the fact that once a roadway becomes saturated (which even with the conservative estimates, many of the roads are forecast to become), then there comes a point where no further traffic can be accommodated. For example, the freeways have existing high traffic volumes and with further growth show warrant for substantial increases in number of lanes to meet capacity. Notably by the time 2040 becomes a reality there will be many new innovations, such as connected vehicles, which will override the need for such extreme number of lane needs and therefore the growth projections are more than reasonable for purposes of forecasting trips through the year 2040. We recommend maintaining the proposed growth rate caps, with the exception of the HEFT facility which has been requested by the Florida's Turnpike to use higher rates.

**FDOT No. 21:** Page 48, Table I-14: Please label and explain the difference between the 1st and 2nd columns labeled as "Referenced Intersection % Growth". It appears in the Appendix that there are two sets of intersection growth rates for the two Phases (Phase I and Phase II). Please define the Phases in a footnote and label the column appropriately.

Headers will be included in the updated report that identify the two columns as respectively 2015-2020 and 2015-2040 percent growth rates. Column headers match with the column headers from the Appendix I-J which detail initial growth percentages based on the roadway link historically observed growth rates which served as the basis for the development of the estimates presented in Table I-14.

**FDOT No. 22:** Page 53-54, Table I-16: Please check for missing intersections and revise as necessary. Only Intersections 16 through 54 are provided.

Please refer to response to FDOT Comment No. 6 which addresses the missing page.

### **Chapter 1, Section 9 - Project Trip Distribution**

**FDOT No. 23:** Socio-economic data was factored to match the daily ITE trip generation calculations for the external trip quantities. How was this performed? The model plots show % trips from the select zone analysis but not the model volumes in Appendix I-M. Please include model volume plots for this select zone analysis.

The model does not automatically produce the same trip generations as were prepared for the AMD and the Graham sites based on ITE and MOA field studies since the model relies on its own trip generation procedures. The initial SERPM model trips generated for the ADM and the Graham TAZs were adjusted to ensure that the final assigned traffic volumes from these TAZs match with the daily trip generation forecasts presented in Tables I-9 and I-10, respectively. Select zone model volume plots will be added to Appendix I-M of the updated report.

**FDOT No. 24:** Please provide the methodology for determining the number of households with and without children and vehicle ownership for the Graham Property households where there were not households previously.

**The number of household statistics were based on the existing TAZ referenced for the Graham Project and a review of nearby TAZs. Appendix I-L provided a summary of the original versus revised TAZ household characteristics.**

**FDOT No. 25:** Consistent with the traffic methodology, a new TAZ was created for ADM to force access to HEFT and NW 170th Street. There appears to be a centroid connector near the HEFT and NW 170th Street in the submitted material, though it is not identified as an ADM TAZ and the percent distribution is not depicted. When adding the percent trips on the centroid connectors for the ADM TAZ in Appendix I-M, the percentage sums to only 70% indicating that the other 30% is distributed from the new centroid. Please identify the number of the TAZ added near HEFT and NW 170th Street and what socio-economic data was assigned. The table in Appendix I-L should be updated to reflect this TAZ. Additionally, please denote the TAZ with a star for ADM on the map in Appendix I-L.

**Appendix I-L does include both the "main" ADM and the near HEFT/NW 170th 30% ADM TAZs. It should be pointed out that TAZ 2705 is incorrectly shown in the appendix table titled "Platted Parcels in the Cities of Hialeah Gardens, and Unincorporated Miami-Dade County and Potential Development" but should in fact be TAZ 2748. The table will be refined and the new plots to be provided in an updated Appendix I-M will show the HEFT/NW 170th 30% ADM TAZ.**

**FDOT No. 26:** Please include model plots from the newly created ADM TAZ near the HEFT and NW 170th St interchange showing the select zone analysis in both model volumes and percent of project traffic volumes. This will serve as a check that this methodology for matching the expected regional long distance trip making characteristics works as intended.

**A separate select zone analysis will be prepared for the ADM TAZ located near the HEFT/NW 170th Street interchange. The resulting model plots will be added to Appendix I-M. Three separate plot sets will be provided for respectively the Year 2020 Land Use on 2020 Network, the Year 2040 Land Use on 2020 Network, and the Year 2040 on 2040 Network. Please note that additional manual adjustments were included for the Florida's Turnpike/HEFT/SR 821, the Florida's Turnpike/SR 91, and I-75 to increase the regional distributions and extend the trips beyond the SERPM6.5 subarea model area.**

**FDOT No. 27:** On page 63, a typographical error was noted. References to Table I-8 and Table I-9 should be changed to Table I-9 and Table I-10 instead.

**The ADM and the Graham trip generation table references within the text will be corrected to reflect Tables I-9 and I-10, as correctly noted in the above comment.**

### **Chapter 1, Section 10 - Project Assignment**

**FDOT No. 28:** Page 58, 60, and 62, Figures I-10B, 11B, and 12B: Please explain why no traffic to/from the Graham Project is assigned for the link of NW 170th Street from NW 102nd Avenue/NW 107th Avenue to NW 97th Avenue, particularly since there is an access point at the location of NW 102nd Avenue/NW 107th Avenue. The 0.0% value is present for both 2020 and 2040 project distributions.

**The model distribution for the referenced roadway link is zero percent due to the fact that three different centroid connectors are available for trips to exit the Graham TAZ. The model assigns the trips based on the "quickest" path. Acknowledging that there will be travelers exiting Graham via the referenced roadway segment, a manual adjustment will be made to the trip distribution figures and the future year roadway link analyses and will be subsequently included in the updated report.**

**FDOT No. 29:** Page 58, 60, and 62, Figures I-10B, 11B, and 128: Please explain why no traffic is assigned to/from the link of NW 170th Street from NW 82nd Avenue to NW 78th Avenue when both the links to the east and west have project traffic assigned to them.

**Based on the available roadway network, the trips are choosing to take alternate routes to by-pass the indicated roadway link (please refer to the Appendix I-M model plots. No changes are deemed necessary for the analyses since minimal trips are distributed within this general area.**

**FDOT No. 30:** Page 63, Table I-17: Please check the percent distribution values for the link of NW 178th Street between Graham Access and NW 97th Avenue. The values do not match those shown in Figure I-10B.

**The information presented in Table I-17 is the correct. Figure I-10B is simply missing the ADM and the Graham percent distributions for this roadway segment. The same applies for Figures I-11B and I-12B. All three figures will be updated to include the missing percent project distributions.**

#### **Chapters 2 through 4 – Link Analysis**

**FDOT No. 31:** The use of ADM or Graham Property traffic should not be included as "background" traffic in the analysis when determining if a facility is backlogged. The determination of backlogged facilities must be re-done to include only approved background traffic. Throughout the submitted analysis, it is stated that backlogged facilities include traffic generated by either ADM or Graham Property, depending on which project was being analyzed. This means that links which fail due to trips from Graham property or ADM are considered backlogged and not subject to mitigation. This approach to evaluating backlogged facilities is included in the Zoning Link Analysis and CDMP analysis tables in Chapters 2 through 4. Below are examples of roadways identified as backlogged facilities (and failing) because of either ADM or Graham Property traffic.

- a. I-75 from Miramar Parkway to Florida's Turnpike (Table III-5A)*
- b. I-75 from Miramar Parkway to Florida's Turnpike (Tables III-5B and III- 5B)*
- c. I-75 from Florida 's Turnpike to Miami Gardens Drive (Tables II-5B and III-5B)*
- d. Okeechobee Road from Hialeah Gardens to NW 103rd Street (Tables II-5B and III-5B)*
- e. Okeechobee Road from NW 103rd Street to SR 826 (Tables II-5B and III-5B)*
- f. Miami Gardens Drive from I-75 Eastern Ramps to NW 87th Avenue (Tables II-2B and III-2B - )*
- g. Miami Gardens Drive from NW 87th Avenue to NW 82nd Avenue (Tables II-2B and III-2B)*

**The June 22, 2016 approach for generating background traffic included the approach that the other Project was part of the background traffic and therefore was used to identify the traffic impacts for the other Site. As indicated in the introduction to the Comment Response Set, the request to include Graham project trips for the ADM analysis was first introduced in October 2015 as part of comments received from respectively FDOT, Southeast Florida Regional Planning Council, and the City of Hialeah and the Graham trips were included in the analysis presented in the December 22, 2015 CDMP TIA, following addendum to add the Graham Project to the methodology originally derived for the ADM site. As late as May of 2016, a summary of the different analysis scenarios were shared with Miami Dade County.**



The June 22, 2016 includes the Combined ADM and Graham analyses, as per the understanding of the applicant, and does show the overall traffic impacts associated with both projects being in place. The intent of this Chapter was to comply with the agency request but was not intended to override the individual Projects' approach of analyzing the other site as background traffic. Therefore the statement that the results were for "informational purposes only" was included.

In order to comply with agency concerns and to ensure that the CDMP applications remain on schedule, revised analyses will be prepared to review each Project relative to background traffic without the other Project. Furthermore, the analyses will be updated with new traffic counts as per agency comments, adjustments to the roadway improvement tables also per agency comments, and further review of individual segments to ensure that the latest most appropriate assumptions are being applied.

**FDOT No. 32:** It was noted in several tables in Chapter 4, particularly Tables VI-5A, VI-5B, and VI-6B, that two segments of I-75 fail in 2020 and 2040 because of ADM and Graham Property traffic. Yet these two segments (I-75 from Miramar Parkway to Florida's Turnpike, and I-75 from Florida's Turnpike to Miami Gardens Drive) are not listed in Mitigation Summary sections or the Executive Summary of the report. Planned improvements to both I-75 segments will increase capacity to accommodate background growth traffic through 2040 and allow the roadway to operate at an acceptable level of service. However, the addition of ADM and Graham Property traffic causes these I-75 segments to fail, according to the submitted analysis. As a result, please identify the necessary improvements for these two I-75 segments to allow them to operate at an acceptable level of service with both project's traffic, and include these improvements under each Mitigation Summary section of the report.

**Please see response to FDOT Comment No. 31 above.**

**FDOT No. 33:** In Chapters 2 through 4, the volumes and lane geometries for various roadway segments for the 2020 and 2040 Zoning and COMP analysis tables differ. When comparing Table II-5A (2040 CDMP Analysis) with Table II-6A (2040 Zoning Analysis) the total trips for a particular roadway segment are not the same. In some cases, the number of lanes (CF + proposed) are different. For example, SR 826 shows 10 lanes in the zoning analysis for 2040 and 10+4/12+4 in the CDMP analysis for 2040. Also, the segment of Florida's Turnpike from SW 8th Street to SR 836 was assigned 311 combined northbound trips for the 2040 PM peak hour CDMP analysis, but only 307 combined northbound trips for the 2040 PM peak hour Zoning analysis.

Please clarify the apparent project trip assignment and roadway geometry inconsistencies and revise the analyses, as appropriate.

**The 2040 CDMP and the 2040 Zoning analyses represent two different traffic assignments and thus analyses. For the 2040 CDMP analysis, the year 2040 SE data is assigned on the cost feasible network (a.k.a. 2040 network); whereas for the 2040 Zoning analysis, the year 2040 SE data is assigned on just three years of committed roadway improvements similar to the previously utilized "DRI" methodology (a.k.a. year 2020 network). As a result there are two different project percent distributions (Figures I-11A/B vs. Figures I-12A/B) and two different project assignments (as noted by the reviewer). This also explains why there are differences in the number of lanes, and corresponding roadway capacities, shown in the two sample tables as mentioned in the above comment. For the 2020 CDMP and the 2020 Zoning analyses, the results are identical since both rely on year 2020 SE assigned on the 2020 network. Accordingly, no changes are necessary to the analyses presented in Chapters 2 through 4.**

**FDOT No. 34:** The Mitigation Summary in each chapter does not include intersection mitigation. Please add the intersection mitigation summary to this section. This summary is included in the executive summary but does not differentiate between Graham and ADM responsibilities.

**Intersection mitigation summaries will be added to Chapters 2, 3, and 4, as requested. Mitigation responsibilities between the two Sites will be identified as well.**

**FDOT No. 35:** Please revise the analysis of backlogged facilities such that ADM and Graham Property project traffic are not considered as background traffic. In the Intersection ADM Mitigation Summary appendices (II-I, II-J, III-H, III-I), items that are significant are highlighted in yellow. In some cases (e.g., NW 186th Street / Miami Gardens Drive & NW 57th Avenue) mitigation is proposed for turning movements, which includes traffic impacts from both ADM and Graham Property. Intuitively, if both projects contribute significant traffic impacts to a turning movement requiring mitigation, then the mitigation costs should be shared between the two developments. Please clarify how the projects included in the intersection needs of the executive summary were determined to be significantly impacted by ADM and Graham Property developments.

**The updated CDM report will include reanalysis of all intersections including updating default assumptions, as referenced in earlier FDOT comments. Results will be summarized in each Chapter mitigation section and the Executive summary as requested.**

**FDOT No. 36:** In comparing Table II-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – ADM Impacts and III-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – Graham Impacts, the LOS with both ADM and Graham Property included do not match. Given that this column should include all trips from both projects, it is expected that the LOS would be the same. Please correct the apparent discrepancy.

**Correct, the intersection LOS values for the two tables should match for the final column with total traffic volumes included when the total volumes are the same, as was the case. In line with the approach to no longer include the other Project as background traffic, the results will no longer have the same results.**

**FDOT No. 37:** Page 83, Table II-4 and Page 112, Table III-4: Please check LOS values for Intersection ID 9 (NW 57th Avenue at Miami Gardens Drive), and explain why this intersection operates better with the additional project trips than with just the background traffic only.

**The intersection should not in theory operate better for the With Project trips than the With Background Only trips but did in few cases due to the fact that individual signal timings were revised. We acknowledge that there were a few cases which should have been better analyzed.**

**FDOT No. 38:** Page 95, Table II-7 and Page 156, Table IV-7: Please check LOS values for Intersection ID 16 (SR 823/Red Road at Turnpike Ramp (E)), and explain why this intersection operates better with the additional project trips than with just the background traffic only.

**Please see response to FDOT Comment No. 37.**

**FDOT No. 39:** Table II-7 is included in both Chapters 2 and 3. Chapter III is specific to the Graham property but the Table II-7 states it is for the ADM impacts. The table appears to be identical including the headers of the table. Please replace Table II-7 in Chapter III with the correct Table III-7.

**The table will be updated to correctly reflect the intersection LOS results for the Scenario being analyzed.**

**FDOT No. 40:** Table II-7 states "Zoning Short Term (Year 2040)." Please change to "Zoning Long Term (Year 2040)."

**The table name will be revised as indicated.**

### **Chapter 2, Section 8 - Mitigation Summary**

**FDOT No. 41:** Page 127, Second Paragraph (sentence before bulleted list): Please clarify if the listed improvements are for the ADM and/or Graham Project. ADM is referenced twice in the noted sentence. This also occurs again on Page 149 in the same location under Section 6.0 Mitigation Summary.

**The text for the Chapters II, III, and IV Mitigation summaries will be updated to state that "A summary of the improvements proposed as part of the study area roadway improvement plan for American Dream Miami and the Graham Project are summarized below and reflect those improvements that are baseline for the two projects, prior to reviewing additional mitigation needs:"**

### **Chapter 3, Section 5 –Year 2040 AM and PM Zoning Analyses**

**FDOT No. 42:** Page 116 – 119, Tables III-5A & 5B: Please check for an error in the font color for columns under Background Trips Peak Hour Peak Dir Analysis NB/EB (Vol/LOS). Not all values in red font are failing.

**The font color will be refined to ensure that just those LOS values which exceed the adopted LOS are indicated as red.**

### **Missing Tables**

**FDOT No. 43:** There appear to be several tables missing from the submittal package (see cursory list below). Please revise the report to include all summary tables.

- a. *The first half of Table II-3B is missing*
- b. *The first half of Table II-5A is missing.*
- c. *The first half of Table II-6B is missing.*
- d. *Table III-5B should be renamed "Table II-5B" to be consistent with the report's naming conventions.*
- e. *The first half of Table III-3B is missing.*
- f. *The first half of Table III-6A is missing.*

**Please refer to response to FDOT Comment No. 6 in regards to the pages missing. Item d will be revised to "Table II-5B."**

### **General Synchro Comments**

**FDOT No. 44:** After reviewing the output from the Synchro analyses there are some discrepancies in the inputs used for the existing and future conditions.

- a. *The peak hour factor for all intersections/approaches was used the default value. Was this discussed and agreed upon during the methodology agreement?*
- b. *Cycle length/offsets and minimum initial (minimum green) did not correspond to Miami Dade County Signal Systems TOD sheets. Also please provide the Signal Timing sheets used as reference for the Synchro inputs within the appendix area.*

- c. *It is not possible to verify the truck percentage used in the analyses due to the output sheets provided. It is important to account for this input in the Synchro analyses. Please provide both the methodology and process for how the truck percentage was chosen for the approaches or intersections and provide the appropriate HCM output from Synchro.*
- d. *For the reference (yield) point, "beginning of green" is used for actuated- coordinated intersections. Was this verified with the Miami Dade County area engineer for these signals? Typically, the majority of signals in the County have a reference point of "beginning of yellow" for the main movements. Please check data and update the analyses with the correct input.*
- e. *Some intersections between the existing conditions and future analyses get switched from actuated-coordinated operation to uncoordinated in the future. Please clarify the reason for this change.*
- f. *For the future analyses, was the signal timing optimized for the "without mitigation" and the "with mitigation" scenarios? Please clarify when optimization was used and if there were any manual adjustments to the timing or other system parameters for the Synchro files.*

**All changes requested above will be included in the updated intersection analyses. For the peak hour and the truck percentages, the factors are based on local traffic counts. The peak hour factors will be included in the updated intersection volume spreadsheets (Appendix I-K) and the development of truck factors will be included in a new appendix. Miami Dade County Signal System TOD sheets will also be included in a new appendix. For all other comments relating to signal timing, please refer to response to FDOT Comment No. 12.**

## **MIAMI-DADE COUNTY TRANSIT, DATED AUGUST 26, 2016 (Revision No. 6):**

Miami-Dade County has submitted a report titled "Transit Impact Report" for CDMP Applications the for ADM and the Graham Projects which outlined the forecast transit needs for the two Sites, along with estimated annual operating costs.

**The applicant acknowledges receipt of the transit report and intends to work joint with the County to address transit needs and requirements associated with the two Sites.**

## **FLORIDA'S TURNPIKE DISTRICT, DATED AUGUST 26, 2016:**

The County can consider the District's comments representative of important Turnpike input as well, with regard to the applicant's submittal. A couple of additional Turnpike facility specific comments are provided below:

**Turnpike Comment No. 1:** Turnpike projects on the Homestead Extension of the Florida's Turnpike (HEFT), south of SR 836 (inclusive of managed Express Lanes) are let for construction (Design-Build). The analysis should include these projects.

**The proposed improvement tables will be updated to include the mentioned additional project (TIP 435543-1) and the analysis will likewise reflect the improved number of lanes. The applicant has prepared an updated review of the most recent Transportation Improvement Plans for respectively Broward and Miami-Dade Counties and will be updating Tables I-11 and I-12 accordingly.**

**Turnpike Comment No. 2:** Turnpike has additional count/toll information available which is not included in the FDOT FTL. The availability of this information was shared with the applicant during the methodology meetings but was not requested by the applicant for the preparation of the analysis.

**The applicant appreciates the Turnpike's offer to supply additional traffic count information and has reached out to request those counts so they can be reflected in an update of the June 22, 2016 report.**

**Turnpike Comment No. 3:** HEFT, in the project vicinity, has sustained considerable growth rates (with the exception of recession years). The calculated annualized growth rate (which included recession years) from 2000 – 2015 is 3.5% north of SR 836 and 3.0% south of SR 836. The development of growth rates for this facility should be assessed independently of the other limited access facilities. Information from the Turnpike’s Annual evaluation is provided below for information/reference.

**North of SR 836**

Weighted Average Growth Rate																Trend	'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015
45,400	51,100	53,800	59,700	64,600	68,500	71,900	75,200	74,600	73,000	75,500	76,200	78,400	77,900	81,400	89,600	52,051	87,549
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015			
12.60%	5.30%	11.00%	8.20%	6.00%	5.00%	4.60%	-0.80%	-2.10%	3.40%	0.90%	2.90%	-0.60%	4.50%	10.10%			3.50%

**South of SR 836**

Weighted Average Growth Rate																Trend	'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015
48,700	53,300	55,600	60,300	70,300	77,400	81,100	82,200	76,900	72,600	74,300	76,200	78,300	80,400	83,700	90,500	56,598	88,627
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015			
9.40%	4.30%	8.50%	16.60%	10.10%	4.80%	1.40%	-6.40%	-5.60%	2.30%	2.60%	2.80%	2.70%	4.10%	8.10%			3.00%

**The growth rates provided with the Turnpike's comment have been reviewed and the analyses will be updated to reflect the higher historical growth rates for HEFT, as requested.**

If additional Turnpike comments should be noted, time permitting, they will be submitted to MDC or will bring on Sept 9.

## BROWARD COUNTY, DATED SEPTEMBER 1, 2016:

**Broward County Comment No. 1:** It is unclear how the 10.8-percent upward adjustment for light rail transit (LRT) resulted in the addition of 6,481 daily trips and 491 PM peak hour trips. These values do not agree with our calculations. Please provide a worksheet outlining the LRT adjustment calculations and please provide backup for any assumptions accepted for this adjustment.

**There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the LRT, was scrutinized to a great extent and does not warrant further review.**

**Broward County Comment No. 2:** It is maintained in the study that the hotel component is an ancillary/complementary land use and was reflected in the trip generation estimates for ADM derived from count data collected at Mall of America (MOA). It was further stated in a reply to a previous comment about the hotel component that the ADM site is not near other Miami-Dade attractions such as the beaches or airport and therefore is not expected to generated trips other than visitors to ADM. In response to the ancillary/complementary land use comment, MOA has 506 rooms on-site to accommodate approximately 4,400,000 square feet (SF) of gross floor area (GFA), or about one room per 8,700 SF of GFA. ADM is proposed to have 2,000 rooms for 6,200,000 SF of GFA which equates to one room per 3,100 SF of GFA. Proportionally, ADM will have 2.8 times more hotel rooms per SF of GFA than MOA and accordingly, it is not reasonable to expect that all guests will be visiting the hotels as an ancillary use of ADM. With regard to the response that the location of ADM is not near other Miami-Dade attractions, it should be noted that there are at least four hotels comprising over 500 hotel rooms in the Miami Lakes Main Street area, located within two to three miles of the site, also similarly remotely located from the airport and beaches. Therefore, it is not a reasonable assumption that the project’s hotels will not generate trips other than ancillary to ADM. Furthermore, as the area develops with other planned and committed projects, the demand for hotel rooms will increase. For the above reasons, we continue to recommend that an adjustment to trip generation be made to account for hotel visits not specifically associated with ADM.



**There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the land use and corresponding trip generation assumptions, was scrutinized to a great extent and does not warrant further review.**

**Broward County Comment No. 3:** The analysis shows that Miramar Parkway west of I-75 operates at Level of Service (LOS) C and will continue to do so for future conditions. This was brought up in our previous comments and the response was that the analysis was based on 2014 traffic count data. 2015 traffic counts for the intersection of Miramar Parkway and Dykes Road/SW 160 Avenue (Attachment A) indicating that Miramar Parkway is currently operating overcapacity. Furthermore, Synchro analysis (Attachment B) shows that during the PM peak, the intersection of Miramar Parkway and Dykes Road operates at LOS F.

**The analysis will be updated to reflect the furnished updated traffic count data for Miramar Parkway and the analyses will be revised accordingly.**

**Broward County Comment No. 4:** During the review meeting held at SFRC on January 22, 2016, there was discussion of extending transit to this site and construction of park and ride facilities. Whist Miami-Dade Transit will be the primary service provider, staff would encourage the applicant to explore option for transit service north of the site with Broward County Transit. Transit riders are likely to employees working in retail, hotel and park components of the project. South Broward County has many residential neighborhoods which would be included in the future labor pool.

**Comment and request noted. Additional efforts will be coordinated in regards to transit for the two sites and will be addressed.**

## **ADDITIONAL COMMENTS RECEIVED BUT NOT ADDRESSED AS OF 9/7/2016**

**NOTE: Comments were also received from Miami-Dade County DTPW and RER. The comments were received on September 7, 2016 and the applicant has not had the opportunity to thoroughly review and respond to the comments as of this date.**

### **MIAMI-DADE COUNTY DTPW, DATED SEPTEMBER 7, 2016:**

**County DTPW Comment No. 1:** Executive Summary: Please explain the 220 [sic 22] various scenarios listed for the intersection analyses. It would appear that only 18 scenarios would be required, 9 alternatives for both AM and PM Peak Hours: 1-Existing, 2 & 3 - Future No-Build (2020 & 2040), 4 & 5- ADM Alternative Only (2020 & 2040), 6 & 7 - Graham Project Alternative Only (2020 & 2040), 8 & 9 – Total Combined Projects (2020 & 2040).

**County DTPW Comment No. 2:** Section 1-Overview: What is the difference in the CDMP versus the Zoning analyses? From a traffic analysis perspective, the concern mainly exists with the worst-case scenarios. Please advise.

**County DTPW Comment No. 3:** Figure I-3 through 6: Please zoom into the study area and identify the highlighted roadway segments with their street names.

**County DTPW Comment No. 4:** Section 6.2-Existing Roadway Link Directional PHPs: Please clarify and provide an example for the following statement:

*“For the MDC counts, the PHPs were ratio'ed to the official PHPs identified by the County in its count reports and the directional distributions observed from the raw counts were then used to derive northbound/eastbound (NB/EB) and southbound/westbound (SB/WB) PHP directional volumes.”*

**County DTPW Comment No. 5:** Section 6.3-Existing Roadway Link Directional LOS: Please provide the data assumptions for the roadway segments used to determine the maximum service volume thresholds. Also, there were no FDOT tables included in Appendix I-C, only Intersection TMCs.

**County DTPW Comment No. 6:** Table I-4: The PM LOS is missing for ID #10. Also, please show the intersection delays for all the LOS Summary tables throughout the report.

**County DTPW Comment No. 7:** Table I-10: The Diverted Trip to Retail Use volumes which were calculated from the ITE Trip Generation Handbook Pass-by Trip volumes for Land Use Code 820 are only valid for the PM Peak Hour since the data was collected for a weekday during the PM Peak Period. No diverted trips should be calculated for the Daily or AM peak analysis. Furthermore, caution should be exercised when using the pass-by fitted curve equation in lieu of non-pass-by trip data as listed in Table F.9 from the ITE Handbook, which includes diverted trip percentages.

**County DTPW Comment No. 8:** Table I-10, Note 2: This states that “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.” The table shows the net external trips with the pass-by reductions. Please advise if the pass-by trips were reduced only for the existing roadway facilities. The traffic at the sites’ driveways and new roadways must show 100% trips as these are all new.

**County DTPW Comment No. 9:** Section 8.3-Background Growth: According to ITE Transportation Impact Analysis for Site Development, growth rates should not normally be employed for horizons beyond 4 to 5 years (i.e. through 2020) because of the variability in growth rates over time and the magnitude of error that can result from a relatively small error in the growth rate over a long period of time (such as using these to generate 2040 volumes).

**County DTPW Comment No. 10:** Table I-16: the first half is missing for ID # 1-15.

**County DTPW Comment No. 11:** Figures I-10A through 12B: Please explain the major differences in the project distribution percentages between the Zoning and CDMP analyses. For example, the ADM Project Distribution on Figure I-11B is 23.41% for the north-south 4-lane segment near the Graham project. This same link however, is listing a 43.19% ADM Project Distribution in Figure I-12B. Otherwise, most of the percentages are similar to their counterparts as compared in the figures.

**County DTPW Comment No. 12:** Section 10-Project Assignment: The diverted trips for the TMVs shown are not shown in detail in Appendix I-K. Please include separate figures to show these volumes.

**County DTPW Comment No. 13:** Table IV-7: This table is numbered IV but should be sequentially numbered VI. Also, this is titled ‘Zoning Short Term (Year 2040)’ but should be Long Term. Also, please confirm that the signal cycle lengths used in the future analyses were the same as existing. Any deviation from these needs to be documented.

**County DTPW Comment No. 14:** Mitigation Summary (all scenarios): Please ensure that the future LOS intersection analyses does not include improvements at the intersections, such as additional/increased turn bay storages, signal optimization, etc. A comparison of the Future No-Build and Build scenarios needs to be evident. A separate LOS analysis should be made for those intersections requiring mitigation. Also, were there any unsignalized intersections that were identified for signalization in the future?

**County DTPW Comment No. 15:** Appendix I-K1: Some of the turning movement volumes do not appear to be adding up correctly. For example, assuming a 1% growth rate from existing to 2020, the background volumes for the AM WB through movement at NW 87<sup>th</sup> Avenue and Miami Gardens Drive should be 1,544; and then adding the ADM and Graham project trips should result in 1,637 instead of 1,621. Please clarify. Also, why are the peak directions different for the two projects during the same peak period?

## **MIAMI-DADE COUNTY RER, DATED SEPTEMBER 7, 2016:**

### **General Comments**

**County RER Comment No. 1:** For each application, include a proportionate share analysis that identifies the applicant’s fair share of the cost of the required transportation improvements.

**County RER Comment No. 2:** Number all of the pages in the report, including tables and maps.

**County RER Comment No. 3:** Some pages appear to be missing, i.e. pages 54, 69, 85, 90, 97, 114, 126, 155, and 156.

**County RER Comment No. 4:** All tables, maps, and corresponding roadway analyses must show all the roadway segments impacted by 5% or more by the projects’ impact.

**County RER Comment No. 5:** All maps and tables need to be labelled to show the major roadways and corridors, and identify all the state roadways.

**County RER Comment No. 6:** List all roadway segments in an orderly fashion from north to south and west to east.

**County RER Comment No. 7:** The roadway links for the existing and year 2040 should correspond to the maps.

**County RER Comment No. 8:** Only projects listed in the Cost-Feasible Plan of the County’s 2040 Long Range Transportation Plan (LRTP) should be considered for future 2020 and 2040 analysis.

**County RER Comment No. 9:** Reference to “FDOT Comments” refers to FDOT’s letter dated August 5, 2016.

**County RER Comment No. 10:** RER staff reserves the right to provide additional comments later and will continue to finalize review of the Revised Traffic Impact Analysis (TIA).

### **Page 1, Executive Summary**

**County RER Comment No. 11:** Clarify if the 70,000 and 10,000 external trips (paragraph three) are daily or PM peak hour trips.

**County RER Comment No. 12:** Page 4, last paragraph, clarify locations in bullet point three and four, and for any other corresponding reference to these locations.

**County RER Comment No. 13:** Clarify the difference between the concurrency, CDMP, and zoning analyses performed.

## **CHAPTER I GENERAL INFORMATION**

### **Page 16, Figure I-1 Project Location and Existing Roadways**

**County RER Comment No. 14:** Show and label all major section line roadways, with the number of lanes, for the entire Study Area.

**County RER Comment No. 15:** Add the following missing interchanges on SR 826: NW 67 Avenue, NW 57 Avenue, and heading further east until the Golden Glades interchange.

**County RER Comment No. 16:** Correct mislabeled “I-75” icon depicted on SR 924/Gratigny Parkway, and on all other applicable maps.

### **Page 17, Figure 1-2 Preliminary Access Plan**

**County RER Comment No. 17:** Site Plan does not show location of applicant’s proposed park and ride facility for Miami-Dade Transit (MDT), please revise Site Plan to depict location of Park and Ride facility.

### **Page 19, Section 5 Study Area**

**County RER Comment No. 18:** Provide a complete listing of the roadway links depicted in Figures I-3 through I-5.

**County RER Comment No. 19:** For Figure I-3, I-4 and I-5 label all major section line roadways and other roadway facilities that are impacted 5% or more by the projects to define the study area.

**County RER Comment No. 20:** The 5% analysis to determine the study area boundaries for the existing, future 2020 and 2040 should include all the major section line roadways within the study area.

### **Page 23, Figure 1-6 FDOT and County Count Station Map**

**County RER Comment No. 21:** Label the corresponding roadways for the traffic count stations depicted.

**County RER Comment No. 22:** List all the traffic counts stations, not just ones impacted by the 5% of the projects’ trips.

### **Page 24, Section 6.2 Existing Roadway Link Directional and Section 6.3 Existing Roadway Link Directional LOS**

**County RER Comment No. 23:** List which peak season count factors were used.

**County RER Comment No. 24:** Correct reference to FDOT’s Generalized Table to Appendix I-E (not I-C).

**County RER Comment No. 25:** Please consider using FDOT’s synopsis reports to obtain the actual peak hour, peak direction volumes, when available.

**County RER Comment No. 26:** Utilize the County’s 3-day traffic counts.

**County RER Comment No. 27:** Provide detailed explanation on how the directional peak hour period (PHP) volumes for the County stations were derived.

### **Pages 25-27, Table I-1 Year 2015 Area Roadway Segment Existing AM and PM PHP Summary**

**County RER Comment No. 28:** Provide copies and identify source of the 15-minute FDOT/MDC/Broward County counts.

**County RER Comment No. 29:** Revise the table, corresponding maps and list all the roadway segments according to the identified study area, for example:

- a. NW 107 Avenue needs to be depicted from Okeechobee Road to NW 170 Street;
- b. SR 826/Palmetto Expressway needs to be depicted from SR 836/Dolphin Expressway to NW 27 Avenue;
- c. Extend the analysis for the HEFT to the Mainline Turnpike;

- d. Interstate I-75 ends at the Palmetto Expressway/SR 826, delete the roadway segment from NW 57 Avenue to LeJune as it is part of SR 924/Gratigny Parkway;
- e. Miami Gardens Drive needs to be extended to NW 27 Avenue;
- f. NW 138 Street ends at Okeechobee and does not continue to the HEFT;
- g. NW 87 Avenue needs to be extended from NW 154 Street to Okeechobee Road.
- h. NW 122 Street needs to be extended to LeJune Road;
- i. SR 826/Palmetto Expressway needs to be extended south to SR 836/Dolphin Expressway.

**Pages 28-29, Table I-2 Existing (Year 2015) Study Area Roadway Segment LOS Analysis**

**County RER Comment No. 30:** Identify the FDOT and County traffic count stations for the roadway segments.

**County RER Comment No. 31:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds

**County RER Comment No. 32:** Adopted LOS values need to follow the Level of Service Standards in the Transportation Element of the CDMF.

**Page 38, Table I-9 Trip Generation Summary for American Dream Miami**

**County RER Comment No. 33:** Document the calculation used to arrive at the 6,481 Daily trips and 491 PM Peak Hour Trips based on the 10.8% LRT adjustment. RER concurs with FDOT Comment No. 15 which also questions this.

**County RER Comment No. 34:** Clarify the vehicle occupancy value used to calculate the LRT adjustment

**County RER Comment No. 35:** The AM/PM internal capture, although it is 0, is labeled incorrectly for each of these corresponding tables

**Page 41, Table 1-11 Future Year 2020 Roadway Improvements**

**County RER Comment No. 36:** Remove NW 97 Avenue from NW 154 Street to NW 170 Street from the Year 2020 Committed Improvements list as that roadway already exists.

**Page 41, Table 1-12 Future Year 2040 Roadway Improvements**

**County RER Comment No. 37:** Clarify that NW 107 Avenue from NW 138 Street to NW 170 Street and NW 102 Avenue from NW 170 Street to NW 178 Street are not part of the Cost Feasible Plan.

**County RER Comment No. 38:** Remove the following from list and corresponding analysis:

1. Okeechobee Road from NW 154 Street to HEFT, as the Priority IV project is for grade-intersections from Krome Avenue to SR 826/Palmetto Expressway. RER concurs with FDOT's Comment No. 18 that the SERPM model is a tool and should not be utilized as a source.
2. NW 138 Street to SR 924 (a state road only east of I-75), and correct listing of the project as the boundaries are from the HEFT to SR 826.
3. HEFT – correct reference from SW 8 Street to SR 836, as that will be widened to 10 lanes, not “10+4” lanes.
4. SR 826/Palmetto Expressway – reference should be corrected to I-75, from NW 170 Street to SR 826.
5. SR 826/Palmetto Expressway – correct the future number of lanes and corresponding analysis from “10+4” to 10 lanes (will be widened from 8 to 10 lanes).
6. Correct other two references to “12+4” lanes on SR 826, as West Flagler Street to I-75 and I-75 north to Dade/Broward County line will be widened with express lanes to a total of 8 to 10 lanes; SR 826 from I-75 to NW



103 Street will be widened with express lanes to a total of 8 to 10 lanes; and SR 826 from NW 103 Street to Flagler street will be widened with express lanes to a total of 10 to 12 lanes.

7. RER concurs with FDOT Comment No. 33 regarding the listing of the “10+4” and “12+4” lanes listed for the 2040 CDM analyses.

#### **Page 45 Section 8.3 Background Growth**

**County RER Comment No. 39:** RER concurs with FDOT’s Comment No. 20 questioning the rationale for the cap placed on growth rate. Florida’s Turnpike Authority has indicated that their facilities sustained considerable growth rates, and due to this they request that independent growth rates be used for their facilities, separate from the rates used for other limited access facilities.

**County RER Comment No. 40:** RER Staff emailed on January 28, 2016 a map, table and corresponding traffic reports for approved plats within the vicinity of the ADM and Graham projects. As there is no reference to usage of said information, please revise for inclusion as background growth.

#### **Pages 46-47, Table 1-13 Year 2020 and Year 2040 Roadway Background Future Growth Rate Summary**

**County RER Comment No. 41:** Revise to provide analysis on the PM peak hour average of the County’s traffic counts for the three-day period which provide a more comprehensive average, rather than the first day of the successive three-day count.

**County RER Comment No. 42:** For the background analysis for both ADM and Graham, revise to omit the background traffic of the other application.

#### **Page 49, Section 8.5 Background Roadway Link Directional LOS**

**County RER Comment No. 43:** Please provide information as to how the service volume values were converted into directional LOS values

#### **Page 50, Table I-15 Year 2020 and Year 2040 Roadway Segment Future Background AM and PM PHP Summary**

**County RER Comment No. 44:** Revise to provide a separate column for FDOT and County vested development orders (DOS) trips, instead of including them as part of the overall background.

#### **Page 66, Section 10 Project Assignment**

**County RER Comment No. 45:** RER concurs with FDOT’s Comment No. 28 questioning the 0.0% trip assignment to/from the Graham project within the roadway link of NW 170 Street from NW 102 Avenue/NW 107 Avenue to NW 97 Avenue.

**County RER Comment No. 46:** RER concurs with FDOT’s Comment No. 29 questioning why no trips were assigned for the roadway link of NW 170 Street from NW 82 Avenue to NW 78 Avenue.

#### **Page 66, Section 9 Project Trip Distribution**

**County RER Comment No. 47:** RER concurs with FDOT’s Comment No. 23 regarding clarification of the socio-economic data and requesting inclusion of the model volume plots.

## CHAPTER II ADM FUTURE TRAFFIC IMPACTS

**County RER Comment No. 48:** RER concurs with FDOT’s extensive Comment No. 31 that backlogged facilities should only include traffic from approved development—it should not include traffic generated by either the ADM/Graham projects.

### **Page 72, Section 1.0 Year 2020 PM Concurrency Analysis**

**County RER Comment No. 49:** Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15.

### **Page 73, Table II-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-ADM PM Impacts**

**County RER Comment No. 50:** Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment.

**County RER Comment No. 51:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.

**County RER Comment No. 52:** The values in the “Adopted LOS” column need to be consistent with the adopted CDMP Level of Service Standards in the Transportation Element.

### **Page 91, Section 6 Impact Fee Assessment**

**County RER Comment No. 53:** The response to Question 10 of the DRI analysis indicates that road impact fees are expected to be paid in the amount of \$110 million. Appendix II-A ADM Preliminary Impact Fee Analysis lists an impact fee of \$58,752,501 for ADM and an impact fee of \$7,439,278 for Graham for a total of \$66,191,779. Revise to resolve differences between the two figures.

### **Page 101, Section 1.0 Year 2020 PM Concurrency Analysis**

**County RER Comment No. 54:** Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15

### **Page 102, Table III-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-Graham PM Impacts**

**County RER Comment No. 55:** Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment

**County RER Comment No. 56:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds

**County RER Comment No. 57:** The values in the “Adopted LOS” column need to be consistent with the adopted CDMP Level of Service Standards in the Transportation Element.

## CHAPTER IV COMBINED FUTURE TRAFFIC IMPACTS

**County RER Comment No. 58:** Relabel Tables VI-2B, VI-3A, VI-5A, VI-5B, VI-6A, VI-6B to IV-2B, IV-3A, IV-5A, IV-5B, IV-6A, and IV-6B to be consistent with the rest of the tables in Chapter IV and listed in the table of contents.

**Page 131, Table IV-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis – Combined ADM/Graham PM Impacts**

**County RER Comment No. 59:** Please clarify how the information provided in this table differ from the information provided in Chapters II and III, Tables II-1 and III-1 Concurrency Short Term (Year 2020).

**Pages 149 and 157, Section 9.0 Mitigation Summary**

**County RER Comment No. 60:** Correct references in the first and second paragraph to the ADM project mentioned twice and include reference to the Graham project.

**County RER Comment No. 61:** First paragraph, Applicant states they are working with various agencies on a “study area roadway improvement plan to include.... with development timelines.” Clarify which agencies they are working with, what formalized agreements have been entered, and provide development timelines.

**County RER Comment No. 62:** The applicant states the previously mentioned roadway improvement plan will “accelerate several cost feasible” priorities from the County’s Adopted 2040 Long Range Transportation Plan (LRTP) into an “earlier timeline.” However, Project No. 2 (the new interchange at HEFT and NW 170 Street) is not part of the Cost Feasible Plan, but is instead listed as a private improvement. Revise to include the appropriate reference to the non-cost feasible plan and to clarify which LRTP Priority the improvements fall under, or if they are not included in the 2040 LRTP.

**County RER Comment No. 63:** All the list of improvements with the exception of the NW 102 Avenue and NW 107 Avenue projects, were assumed to be in place by 2020. Please refer to previous comment and advise feasibility and method by which applicant proposes to advance and pay for the LRTP priorities. As noted, one project is not part of the 2040 LRTP Cost Feasible Plan, and the project on NW 170 Street from the HEFT to NW 97 Avenue is a Priority III (2026-2030).

**County RER Comment No. 64:** Page 98 in Chapter II of the ADM Mitigation Summary Section, projects 4 and 5 in the numbered 1 through 9 list of improvements refer to the “ADM Project Access Road”, while on Page 127, Chapter III in the Graham Mitigation Summary Section, lists as project 13 and 14 the “Graham Project Access Road.” Page 149 in Chapter IV of the Combined Future Traffic Impacts lists the previously mentioned projects 4, 5, 13, and 14 as the “Graham Project Access Road” with the improvements numbered 1 though 9. Please resolve those differences.

**County RER Comment No. 65:** Please clarify the two additional project improvements listed under “Year 2040”. Also, the improvements do not show the backlogged facilities also needing roadway improvements in order to meet acceptable LOS operating conditions.

**County RER Comment No. 66:** Re-evaluate reference to backlogged facilities, in reference to RER previous comments under “Chapter II ADM Future Traffic Impacts.”

**County RER Comment No. 67:** The last sentence on Page 157 states that “alternative travel modes” will be “addressed separate of this Report.” As the application is currently undergoing review, that analysis needs to be provided now.



## CITY OF MIRAMAR

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Yvette Colbourne

Darline B. Riggs

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Kathleen Woods-Richardson

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### **Community & Economic Development**

2200 Civic Center Place  
Miramar, Florida 33025

Phone (954) 602-3264

FAX (954) 602-3448

September 12, 2016

**RECEIVED**

2016 SEP 13 A 10:04

Mr. Mark Woerner, AICP  
Assistant Director for Planning  
Miami-Dade County - Department of Regulatory and Economic Resources  
111 NW 1<sup>st</sup> Street, 12<sup>th</sup> Floor  
Miami, Florida 33128

**Re: American Dream Miami and Graham Properties CDMP Amendment Applications**

Dear Mr. Woerner:

City of Miramar staff has reviewed the applicant's responses to the City's comments submitted on February 2, 2016. New staff comments are shown in italics below.

1. Direct transit service should be provided from the American Dream Miami Mall and Graham industrial/retail development to the park and ride lot at Miramar Regional Park and the Miramar Town Center/Park and Ride.

*The applicant stated that detailed transit routes will be discussed at a later date. Transit routes and connections into Miramar need to be discussed during the review of the CDMP application to identify options to relieve roadway congestion. Discussing this issue during the CDMP process will also help county and city officials plan for additional multi-modal options to serve employees and visitors.*

2. At a minimum, the analysis should evaluate traffic impacts to Miramar Parkway, Pembroke Road, Red Road/NW 57<sup>th</sup> Avenue and Flamingo Road/NW 67<sup>th</sup> Avenue. A level of service analysis at project buildout should be provided for all of these roadways.

*The applicant referred to their response to Broward County Comment No. 11. Broward County Comment No. 11 only refers to Flamingo Road. There are several other roads listed in our comment. The applicant did not respond to impacts on these roads.*

3. The Miramar Parkway buildout year volumes shown in Tables 9 and 10 of the Transportation Impact Analysis are lower than projections prepared by the Broward Metropolitan Planning Organization. The developer's traffic consultant should meet with the City of Miramar, Broward County, and Broward Metropolitan Planning Organization to discuss the impacts to City roadways and potential mitigation. The City is in the process of updating its Capital Improvement Program to include





## CITY OF MIRAMAR

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the extension of Miramar Parkway from its current terminus at SW 192 Terrace to Pembroke Road at SW 196 Avenue. The extension of Miramar Parkway to Pembroke Road will help alleviate the current traffic problem at Miramar Parkway/I-75 Interchange, improve the Level of Service at this intersection and provide an alternate north-south route via US 27.

*The applicant states that this improvement is included in the Year 2020 Cost Feasible Plan. The extension of Miramar Parkway to US 27 is currently included in the 2040 Long Range Transportation Plan for funding between 2031 and 2040. This improvement should be expedited and constructed prior to the American Dream Miami Mall and Graham industrial/retail developments.*

Thank you for the opportunity to comment on these applications. Feel free to contact me with any questions on the City's comments.

Sincerely,

Eric Silva, AICP  
Director

Cc: Kathleen Gunn, Assistant City Manager  
Michael Moore, Chief Operations Officer  
Luisa Millan, Director  
Bissy Vempala, P.E., City Engineer  
Jo Sesodia, Broward County Planning and Development Management  
Greg Stuart, Broward Metropolitan Planning Organization

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### Community & Economic Development

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## Stillings, Noel (RER)

---

**From:** Brandon R. Schaad <schaadb@miamilakes-fl.gov>  
**Sent:** Tuesday, September 13, 2016 2:55 PM  
**To:** Stillings, Noel (RER)  
**Subject:** ADM & Graham Traffic Comments

Hi Noel,

Please accept these comments from the Town of Miami Lakes as follow up to the meeting this past Friday:

- 1) Though according to the traffic consultant, the trips from each of the two projects combined for the determination of significant trips on each link is included in the traffic study, at the very least this is not reflected on the maps (I-10A, I-10B, I-11A, I-11B, I-12A and I-12B). To be clear, determination of the 5 percent significance threshold should be included as if the two applications were one project and NOT with one project included as “background” traffic of the other.
- 2) Please re-examine the trip distribution analysis to determine whether NW 67<sup>th</sup> Avenue should be included. The maps appear to show ZERO trips added to NW 67<sup>th</sup> Avenue, which seems unrealistic considering there is not another north-south surface street to traverses all through the area covered by the map for two miles to its west (to NW 87<sup>th</sup> Avenue).
- 3) As expressed before, the required traffic methodology for both Comprehensive Plan amendments and for concurrency determination are inadequate (as proven by existing traffic conditions despite the existence of the concurrency system for decades), and help to create a situation where driving is the only viable option. At the same time, if a road is already failing, then according to the consultant, there is no mitigation requirement to the applicant, regardless of how many additional trips are being added to a failing segment. Given the size and significance of each of these projects, and certainly their significance when considered together, the County should consider a plan for true multi-modal mobility in this area, and charge the applicant for needed multi-modal improvements based on the number of daily trips generated. This would give the County the policy flexibility to provide viable alternatives to automobile travel, rather than undermining walking, transit and bicycling as possibilities in the (hopeless, by all available evidence) pursuit of free flowing traffic.
- 4) Much of the discussion at Friday’s meeting centered around the possibility of bringing new transit infrastructure directly into the development(s). Are plans/designs for any road or other right-of-way improvements (i.e. 170<sup>th</sup> Street, 186<sup>th</sup> Street, etc.) being developed in a way that will accommodate this possibility?

**Brandon R. Schaad, AICP, LEED AP**  
**Director of Planning**



Town of Miami Lakes  
6601 Main Street  
Miami Lakes, FL 33014  
(305) 512-7128  
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[www.miamilakes-fl.gov](http://www.miamilakes-fl.gov)



## Stillings, Noel (RER)

---

**Subject:** FW: May 2016 Traffic Study for ADM/Graham - Comments Received  
**Attachments:** Okeechobee Toll Plaza\_ Mainline Data\_March 2015.pdf; Okeechobee Toll Plaza\_ Mainline Data\_February 2015.pdf; Growth Workbook.xlsx

**From:** Samson, Kim C. [<mailto:Kim.Samson@dot.state.fl.us>]  
**Sent:** Wednesday, September 14, 2016 3:33 PM  
**To:** Charlotte Davidson <[cnd@lce-fl.com](mailto:cnd@lce-fl.com)>  
**Cc:** Somoza, Napoleon (RER) <[NVS@miamidade.gov](mailto:NVS@miamidade.gov)>  
**Subject:** FW: May 2016 Traffic Study for ADM/Graham - Comments Received

Charlotte,  
Please note, that I extracted the incorrect summary portion of the growth workbook within my previous comment submittal. The correct annualized growth south and north of SR 836 are 2.4 and 3.0%, respectively.

Kim

**Kim Samson, PE, PTOE**  
Project Manager, Planning Traffic Engineering  
FTE - Traffic & Revenue Engineering Consultants  
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Pompano Operations Center  
P.O. Box 9828  
Ft. Lauderdale, FL 33310

---

**From:** Mtoi, Enock  
**Sent:** Wednesday, September 14, 2016 3:20 PM  
**To:** Charlotte Davidson  
**Cc:** Samson, Kim C.  
**Subject:** RE: May 2016 Traffic Study for ADM/Graham - Comments Received

Hi Charlotte,  
Attached are the files with the traffic data for your study area. The mainline data were pulled from the Okeechobee Toll Plaza for February and March 2015. February and March reflect the Turnpike system peak season. I have also attached a page from the current growth workbook.

Please let me know if you have any questions or need any data that we can provide.

Thanks,  
**Enock T. Mtoi, Ph.D.**  
Transportation Engineer  
FTE - Traffic & Revenue Engineering Consultants  
D +1-954-934-1292  
[enock.mtoi@dot.state.fl.us](mailto:enock.mtoi@dot.state.fl.us)

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Pompano Operations Center  
P.O. Box 9828  
Ft. Lauderdale, FL 33310

---

**From:** Charlotte Davidson [<mailto:cnd@lce-fl.com>]  
**Sent:** Wednesday, September 14, 2016 10:29 AM  
**To:** Mtoi, Enock  
**Subject:** FW: May 2016 Traffic Study for ADM/Graham - Comments Received

Enock,

Please find attached the table with highlights of the Turnpike counts that we are looking to receive synopsis reports for.

Thanks again,  
Charlotte

-----  
Charlotte N. Davidson, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Telephone: (407) 281-8100, ext. 205  
Facsimile: (407) 249-2212  
E-mail: [CND@lce-fl.com](mailto:CND@lce-fl.com)  
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**From:** Charlotte Davidson [<mailto:cnd@lce-fl.com>]  
**Sent:** Tuesday, September 13, 2016 1:25 PM  
**To:** 'Kim.Samson@dot.state.fl.us'  
**Subject:** FW: May 2016 Traffic Study for ADM/Graham - Comments Received

Kim,

I just wanted to follow up on my earlier request for the synopsis reports for the Turnpike counts, as per the email below. You are welcome to provide me the email of the person I need to coordinate with.

Thanks,  
Charlotte

-----  
Charlotte N. Davidson, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Telephone: (407) 281-8100, ext. 205  
Facsimile: (407) 249-2212  
E-mail: [CND@lce-fl.com](mailto:CND@lce-fl.com)  
-----

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**From:** Charlotte Davidson [<mailto:cnd@lce-fl.com>]  
**Sent:** Friday, September 02, 2016 4:57 PM

**To:** 'Kim.Samson@dot.state.fl.us'  
**Cc:** 'scot.leftwich@lce-fl.com'  
**Subject:** FW: May 2016 Traffic Study for ADM/Graham - Comments Received

Kim,

Thank you so much for furnishing comments on the June 22, 2016 CDMP for the ADM and Graham projects. We will be reviewing and addressing all comments.

Item 2 mentions that the Turnpike has traffic count data beyond what is available on the FTI site. Would you mind forwarding a request to obtain Turnpike synopsis traffic count reports for the analyzed Turnpike segments (and include me as a cc so I need to know who to follow through with)? I am attaching a list of the overall traffic count locations, including the Florida's Turnpike, where we did not have access to synopsis reports.

If we can be of any assistance in this regards, please let me know.

Thanks and have a nice Labor Day weekend!

Charlotte

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Charlotte N. Davidson, P.E.  
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12151 Science Drive, Suite 101  
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-----

---

**From:** Stillings, Noel (RER) [<mailto:stillin@miamidade.gov>]  
**Sent:** Friday, September 02, 2016 4:31 PM  
**To:** 'scot.leftwich@lce-fl.com'; 'CND@lce-fl.com'  
**Cc:** 'joseph.goldstein@hklaw.com'; [Tracy.Slavens@hklaw.com](mailto:Tracy.Slavens@hklaw.com); [csweet@bellsouth.net](mailto:csweet@bellsouth.net); 'Mdportilla@arnstein.com'; Somoza, Napoleon (RER); Bell, Jerry (RER); Woerner, Mark (RER)  
**Subject:** May 2016 Traffic Study for ADM/Graham - Comments Received

Good afternoon Scot and Charlotte,

Here are the comments we have received so far, from Broward County. I believe you already received the Turnpike comments, but am including them as well.

Regards,

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

**AMERICAN DREAM MIAMI & GRAHAM PROJECT**  
**Comprehensive Development Master Plan (CDMP) Amendment**  
**Transportation Impact Analysis (TIA) and Supporting Traffic Studies**  
**Submitted June 22, 2016**

**COMMENT SET & RESPONSES**  
**As of September 20, 2016**

**Introduction to CDMP TIA Comment Responses**

Attached are the responses to comments received from eight (8) reviewing agencies and interested parties on the CDMP TIA and Supporting Studies dated June 22, 2016, with FDOT Districts 4 and 6 submitting a joint set of comments. In summary, comments were received and responded to from Miami-Dade County Transit, Miami-Dade County Department of Transportation and Public Works (DTPW), Miami-Dade County Department of Regulatory and Economic Resources (RER), Florida Districts 4 and 6, the Florida's Turnpike District, Broward County, Town of Miami Lakes, and City of Miramar.

The applicant has made every effort to address the agencies comments and is fully committed to working with all applicable parties to obtain final consensus on the CDMP TIA and the various supporting studies. Furthermore, the applicant is proceeding forward towards finalizing an updated version of the June 22, 2016 report that incorporates all responses addressed in this Comment Set and Responses. The intent is to resubmit the report within a reasonable time and allow the agencies to review the updated report and ensure that it has adequately accommodated all requests.

One issue which should be further elaborated on is the approach for analyzing background trips. The June 22, 2016 included the assumption that each Project was analyzed individually while considering the other Project's trips as part of the background trips and that this served as the basis for the mitigation recommendations. The request to include Graham project trips for the ADM analysis was first introduced in the Comment and Response Set dated October 16, 2015, as part of comments received from respectively FDOT, Southeast Florida Regional Planning Council, and the City of Hialeah (refer to Appendix I-A-3). Graham trips were included in the analysis presented in the December 22, 2015 CDMP TIA, following addendum to add the Graham Project to the methodology originally derived for the ADM site. As late as May of 2016, a summary of the different analysis scenarios were shared with Miami-Dade County, in part to demonstrate the extensive number of intersection and roadway segment analyses which were being prepared for the sites and to share the length of time required to complete these analyses (due in great extend to the approach of having the other Project in the background traffic and now having three separate Chapters for the ADM, the Graham, and the Combined scenarios). We stand by the analyses which was presented in the report with the statement that this was our understanding of the approach that was intended for the analyses. The applicant is amenable to work with agencies to resolve any issues of concern related to the presented approach and in an effort to make sure that all parties are comfortable with the findings is prepared to reevaluate the analyses without the other Project being included as background trips. Responses to comments on the background trip approach reflect our commitment.



## FDOT DISTRICTS FOUR AND SIX, DATED AUGUST 05, 2016:

### General Comments

**FDOT No. 1:** Since ADM and Graham Property traffic analyses assume interchange improvements that affect an existing or future interchange, an Interchange Access Request (IAR) document, consistent with the *FDOT Interchange Access Request – User's Guide* will be required for each of the interchange modifications. The noted improvements affect an existing, future full interchange, or future partial interchange (Miami Gardens Drive at I-75, HEFT at I-75, a new interchange at HEFT and NW 170th Street, and a partial interchange at NW 178th Street and I-75). Additional traffic analyses beyond that submitted for the CDMP will be required to evaluate impacts upon SIS facilities and interchanges during morning, afternoon, and weekend periods, and identify improvements to accommodate the additional future traffic.

**The applicant will work with FDOT to ensure that all applicable traffic study documents are prepared as needed. The HEFT and NW 170<sup>th</sup> TIJR is already in progress and coordination is being made with the Florida's Turnpike.**

**FDOT No. 2:** Several transportation improvements projects are relied upon to demonstrate adequate public facilities are present by 2020 to accommodate the expected travel demand generated by ADM and Graham Project. These include an interchange modification at HEFT and I-75; a new interchange at HEFT and NW 170th Street; a partial new interchange at I-75 and NW 178th Street; and an interchange modification at I-75 and Miami Gardens Drive. Each of these interchange improvements ultimately requires FDOT and FHWA approval. Please note that current FHWA policy discourages partial interchange configurations and access serving private property. Although FHWA Policy Point #4 stipulates that each case is evaluated on its own merits, it is the Department's experience that obtaining approval for partial interchanges is a difficult and long process that may present scheduling challenges.

**The applicant acknowledges FDOT comment and will continue to work with the Department to ensure that these improvements are in place by the year 2020.**

**FDOT No. 2 Cont'd:** If any of the interchange improvements fail to be approved and/or constructed by 2020, the base transportation network that is the foundation of ADM and Graham Project's traffic analysis is invalid. This would result in additional transportation impacts to area roadways that were not analyzed. Therefore, it is recommended that a condition of approval be included for the ADM and Graham Project COMP submittals contingent upon obtaining the requisite FDOT and FHWA approvals for the proposed interchange access changes. If any of the relied upon transportation improvements are not approved, a re-evaluation of the traffic impact analysis will be necessary.

**The applicant acknowledges the above statements and understands that the submitted CDMP TIA has been based on the presented projects being in place. In the event that a proposed transportation improvement is not in place as planned, additional analyses may be required to address mitigation including but not limited to development phasing, scale of development or alternative transportation mitigation.**

**FDOT No. 3:** Please provide the electronic Synchro files so that they may be reviewed.

**The electronic Synchro files will be included once the updated CDMP TIA and Supporting Traffic Studies report is resubmitted accommodating the responses to agency comments, per the introductory overview.**

**FDOT No. 5:** Please add delay and v/C ratio values to all intersection LOS summary tables for ease of comparison between the various analyses conducted and for verification with the Synchro analysis. Such information is beneficial for understanding the intersection mitigation improvements if the approach and movement specific delay and LOS were provided in tabular format.

**Delay will be added to all intersection LOS summary tables, as requested. Specifically Tables I-16, II-4, II-7, III-4, III-7, IV-4, and IV-7 will be updated to include the final delay along with the overall intersection LOS results. Overall intersection volume to capacity ratios are not produced in the updated intersection results (e.g.**

**HCM 2010, as requested). Information on approach volume to capacity ratios will be maintained within the Appendices showing the individual intersection analysis outputs.**

**FDOT No. 5:** Page 99, 128, & 157, Mitigation Summary, Intersection Improvements: Why were intersection improvements limited to only three variations (1 exclusive right turn lane, 3 through lanes, and 2 left turn lanes)? Each intersection depending on location and geometry should have been assessed separately. Unique lane geometries should be tested to determine what is necessary for the intersection to function at an acceptable LOS.

**The mitigation limits were set to ensure that reasonable assumptions were made in regards to the potential future layout of intersections. At this point in time, there are many uncertainties in regards to what nearby land use and associated access points could exist by the time the Projects are being implemented (e.g. 2020 and 2040). Mentioned "unique" lane configurations, such as two right turn lanes or three left turn lanes, are complicated by the need to have receiving lanes to accommodate such geometries and in turn depend on numerous other supporting factors such as potentially having to merge the traffic back to its original number of receiving lanes. The most conservative and realistic approach is to set the intersection configurations to the identified maximum mitigations (e.g. 1 exclusive right turn lane, 3 through lanes, and 2 left turn lanes).**

**FDOT No. 6:** Please check the page numbering of the report documents. There seems to be some skipped numbers.

**The first page of several of the tables were accidentally left out when compiling the submitted June 22, 2016 CDMP TIA and Supporting Traffic Studies report. The missing pages that will be added back into the updated report are:**

Page No.	Item
53	1st pg of Table I-16, Year 2020 and 2040 Background Intersection LOS Analysis
64	1st pg of Table I-17, Year 2020 SE Data on Year 2020 Roadway Network Project % Distribution & PM Trips
82	1st pg of Table II-3B, Zoning Short Term (Year 2020) Study Area Roadway Segment LOS Analysis - ADM PM Impacts
87	1st pg of Table II-5A, CDMP Short Term (Year 2040) Study Area Roadway Segment LOS Analysis - ADM AM Impacts
94	1st pg of Table II-6B, Zoning Long Term (Year 2040) Study Area Roadway Segment LOS Analysis - ADM PM Impacts
111	1st pg of Table III-3B, Zoning Short Term (Year 2020) Study Area Roadway Segment LOS Analysis - Graham PM Impacts
121	1st pg of Table II-6A, Zoning Long Term (Year 2040) Study Area Roadway Segment LOS Analysis - Graham AM Impacts

**Referenced page numbers are with respect to the June 22, 2016 CDMP TIA and Supporting Traffic Studies report.**

### **Executive Summary**

**FDOT No. 7:** There are 9 improvements, including interchange improvements at I-75/HEFT/Miami Gardens Drive, a new interchange at HEFT and NW 170th Street, and I-75 ramps at NW 178th Street to/from southbound I-75, that are assumed to be constructed by 2020. These improvements form the basis of the 2020 roadway network used for the submitted concurrency analysis, zoning analysis, and comprehensive development master plan analysis. It is suggested that these improvements be identified in the Executive Summary, and specified as roadway improvements necessary to accommodate both developments' traffic. This comment also extends to the Mitigation Summary section for Chapters 2 and 3.

**The addition of the above mentioned improvements will be added to the Executive Summary and are part of the Mitigation Summaries (please also refer to response to FDOT Comment No. 41).**

## **Chapter 1, Section 6 - Existing Conditions**

**FDOT No. 8:** In some instances, FDOT daily traffic volumes were adjusted using K and D factors to estimate peak hour, peak directional volumes for roadways. Please consider using synopsis reports for those count stations to obtain an actual peak hour, peak directional volume for the existing conditions. Such synopsis reports can be provided by FDOT upon request.

**Synopsis reports have been requested from FDOT and will be incorporated into the updated analyses.**

**FDOT No. 9:** In Appendix I-D, please include the name of the intersection in the header of all Synchro output worksheets. Also, please identify the type of analysis (HCM 2010 or Synchro 9) and results represented on each worksheet. This applies to all Synchro output worksheets provided for each scenario in each chapter of this submittal package.

**The intersection name will be included in the header for all Synchro output worksheets. As indicated in response to FDOT Comment No. 11, the outputs will be updated to represent HCM2010 results.**

**FDOT No. 10:** Page 25, Table I-1: For Segment NW 107th Avenue from NW 122nd Street to NW 138th Street, please place Note number (4) under the appropriate column. Also, it is understood that no data was available for this segment, however please explain why the assumption of an AADT of 8,000 was used. How was this value determined?

**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.**

**FDOT No. 11:** Page 31, 1st Paragraph: It is stated that Synchro's HCM 2010 methodology will be used for the output results; however the results provided throughout the document and the Synchro outputs in the appendix are not of the HCM methodology. They are instead the calculated delay and LOS from the Synchro system, which does not calculate the results according to HCM. You must choose to print the HCM 2000 or 2010 version outputs within the software. Please provide the HCM output results for all existing conditions and future Synchro analysis.

**Correct, the report did state that the HCM 2010 results were being produced for the Synchro outputs. The report should have stated the Synchro results were produced. In fact for the June 22, 2016 submittal, the decision was made to reference the Synchro results in lieu of the HCM 2010 results due to the more realistic vehicular operations which are referenced in Synchro. For example, Synchro is specifically set-up to evaluate the queuing of vehicles at intersections and also has the option to include the free-flow right on red movements.**

**Since FDOT's comment specifically requests that the HCM results be included instead, the applicant will revise its approach and the newly updated CDMP TIA report will include HCM 2010 results. All intersection analyses and summary tables will be updated accordingly.**

## **Chapter 1, Section 8 - Background Conditions**

**FDOT No. 12:** Identified in Appendix I-D, unusual cycle lengths were used to analyze many of the intersections. For example, at the intersection of Florida's Turnpike ramp termini and Okeechobee Road a 133-second cycle length was analyzed for the south ramp termini intersection. However, the north ramp termini intersection was analyzed with

a 80- second cycle length, even though they were evaluated as an actuated-coordinated system (See page 526 of Appendix I-D). Similarly, at Florida's Turnpike and Red Road, the west ramp termini intersection was studied with a 69.4-second cycle length, and at I-75 and Miramar Parkway, the south ramp termini intersection was analyzed with a 65.4-second cycle length (see pages 532 and 540 of Appendix I-D). It is recommended that all intersection analyses be revised to reflect the cycle lengths and phasings from existing signal timing sheets. Future year analyses should maintain cycle lengths and phasings, although splits may be optimized to reflect different green time needs due to traffic volume changes.

**For consistency, the intersection analyses will be revised to reference the existing timings. This will be included for all future intersection analyses and results will be provided in the updated appendices and corresponding intersection summary and mitigation tables.**

## **Chapter 2, Section 8 – Weekend Review**

**FDOT No. 13:** The text provided for the Weekend Review (page 94 of the PDF) indicates that no further review of weekend conditions is needed based on the findings. However, no specific findings are written in support of this statement. Please provide additional details concerning the weekend evaluation to justify not analyzing weekend conditions further. For example, a comparison of ADM and Graham Property project volumes for a typical weekday and weekend should be provided; a comparison of total traffic volumes for a weekend and weekday should be included; and an assessment of directional volume changes that may impact SIS facilities and nearby interchanges in a manner different from what is experienced currently.

**As indicated in Section 8.0, the weekend analysis is contained in Appendix II-C and includes the referenced comparison of typical p.m. weekday traffic versus Saturday peak hour of generator traffic associated with the ADM site. The analysis includes assignments on Miami Gardens Drive from I-75 Eastern Ramps to NW 87th Ave, on Florida's Turnpike/HEFT/SR 821 from US 27/Okeechobee Road to NW 170th Street, and on I-75 from Florida's Turnpike to Miami Gardens Drive. The analysis addressed all the above mentioned criteria for the weekend analysis and concluded that the weekday p.m. peak hour is the highest total traffic period during the week. It was therefore determined that there was not a need to analyze all roadway segments within the study area for the weekend period and that the traditional weekday period served as the worst case traffic conditions.**

## **Chapter 1, Section 6 – Existing Conditions**

**FDOT No. 14:** In section 6.2, the PHP is defined as the average of the two highest consecutive hours of traffic and defined as the average of traffic volume between 7-9 AM and 4-6 PM. Are these the highest consecutive hours of traffic for all links? The two highest consecutive hours should be determined from traffic counts and defined for SIS facilities, Turnpike facilities, Other State Facilities, and County Facilities separately. This methodology should be consistent with the Interchange Access Request methodology.

**The applicant acknowledges FDOT's comment and the County's procedure for deriving PHP volumes based on the two highest consecutive hours of the day. For the intersection turning movement counts, the field counts were based on the AM hours between 7:00 am and 9:00 am and the PM hours between 4:00 pm and 6:00 pm, the traditional highest hours of the day. As such, the existing intersection TMVs are based on an average of the field observed two-hour period counts. For consistency purposes, it is the applicants' traffic consultant's professional opinion is that it makes the most sense to use the same two-hour peak periods for all intersection and roadway segment counts and is therefore recommending not to revise the approach for the development of PHP volumes.**

## **Chapter 1, Section 7 - Trip Generation**

**FDOT No. 15:** The Department does not dispute the 10.8% LRT adjustment to net external trips which was previously approved as part of the methodology and shown in Table I-9. However, the calculation of the LRT adjustment should be reviewed. If 10.8% of person trips to MOA took LRT then this 10.8% should be applied to the person trips visiting ADM. Assuming a vehicle occupancy of 2.3 for ADM to match the vehicle occupancy of MOA then 69,822 daily net external vehicle trips translates to 160,591 person trips. To add the 10.8% back divide 160,951 person trips by  $1 - .108 = .892$  so 180,438 person trips to American Dream Mall. Converting back to vehicle trips with a 2.3 auto occupancy gives 78,451 vehicle trips. The difference between 78,451 and 69,822 vehicle trips is 8,629 additional vehicle trips. Please clarify the difference between the 8,629 vehicle trips calculated vs. the 6,481 vehicle trips provided in Table I-9.

**There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the vehicle occupancy, was scrutinized to a great extent and does not warrant further review. Furthermore, we should point out that the calculations in the comment have overlooked the MOA person trips arriving by tour buses, hotel shuttles, local buses, etc which totaled 8% of the person trips. This is included in the vehicle counts. Given their higher vehicle occupancy, not adjusting for that first will yield the wrong conversion to vehicle trips. This was all accounted for in the trip generation negotiations and therefore is part of the agreed to trip generation methodology.**

**FDOT No. 16:** In the Addendum to TIA Methodology for CDM (Nov. 24, 2015) PM internal capture was 15.1% in 2020 and 10.8% in 2040 for the Graham project, but the current analysis shows 24.48% in 2020 and 18.38% in 2040. Unless otherwise approved, use the same internal capture rates that were previously approved in the methodology.

**The trip generation table presented in the June 22, 2016 TIA varies from the November 24, 2015 information and again was coordinated with review agencies during the early months of 2016. No further refinements are warranted at this time, as all issues related to the trip generation is considered to have been finalized.**

## **Chapter 1, Section 8 - Background Conditions**

**FDOT No. 17:** Florida's Turnpike from I-595 to Pines Blvd in Broward County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Broward MPO 2040 LRTP. The identified source in Table I-12 is the SERPM7.0 model. The model is a tool and should not be used as a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.

**The model travel demand forecasts and all the Year 2040 CDM roadway LOS tables will be updated to reflect that the Florida's Turnpike from I-595 to Pines Blvd is not widened. Table I-12 will also be updated along with all corresponding roadway link LOS analyses. Please consider this as notification to FDOT that there is an inconsistency between the 2040 Broward LRTP and the SERPM7.0 model.**

**FDOT No. 18:** Okeechobee Road from NW 154th St to Florida's Turnpike in Miami-Dade County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Miami-Dade MPO 2040 LRTP. The identified source in Table I-12 is the SERPM 7.0 model. The model is a tool and should not be used as a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.

**The model travel demand forecasts and all the Year 2040 CDM roadway LOS tables will be updated to reflect that Okeechobee Road from NW 154th St to Florida's Turnpike is not widened. Table I-12 will also be updated along with all corresponding roadway link LOS analyses. Please consider this as notification to FDOT that there is an inconsistency between the 2040 Miami-Dade LRTP and the SERPM7.0 model.**



**FDOT No. 19:** SERPM 7.0 model is identified as a source for three projects in Table I-12 but the methodology identified SERPM 6.5/Managed Lanes PD&E model, plus Turnpike edits for their planned future projects, plus the approved SERPM 7 socioeconomic data integrated in. Please clarify which model was used for this analysis.

In fact, the "SERPM6.5/Managed Lanes PD&E Model plus Turnpike Edits Plus the Approved SERPM 7.0 SE Data" serve as the basis for the model runs prepared for the submitted *CDMP TIA and Supporting Traffic Studies*. The only changes which have been made to the model runs were to accommodate: 1) The latest committed and cost feasible LRTP roadway improvements, 2) The planned roadway improvements as presented in the June 22, 2016 report, 3) The ADM and the Graham Projects land use data, and 4) The requested additional platted projects. The network improvements will be identified in revised Tables I-11 and I-12 presented in the updated CDMP TIA report and will include the previously referenced removal of the three SERPM 7.0 model projects (see response to FDOT Comments No. 17 and 18). The platted projects were detailed in Appendix I-L.

**FDOT No. 20:** Section 8.3 indicates that growth rate caps were imposed on all facilities. In the approved methodology no growth rate cap was included. Please clarify in the report how and why the growth rate caps were determined, and provide any numerical support of this determination.

Correct, the methodology did not address setting a cap for the project traffic growth rates. When reviewing historical growth rates, though, there were links with both negative and extremely high growth rates. For example, Hialeah Gardens Blvd has had an average growth of 19.3 percent per year over the period 2009 through 2014. If 19.3 percent growth is maintained through the year 2040, this would equate to the traffic growing by 100 times its existing value which obviously would not be realistic. It was therefore decided to err on the conservative side and set lower growth rate percent maximum values; keeping in mind that higher growth rates would only serve to make the background traffic automatically fail. The justification is further substantiated by the fact that once a roadway becomes saturated (which even with the conservative estimates, many of the roads are forecast to become), then there comes a point where no further traffic can be accommodated. For example, the freeways have existing high traffic volumes and with further growth show warrant for substantial increases in number of lanes to meet capacity. Notably by the time 2040 becomes a reality there will be many new innovations, such as connected vehicles, which will override the need for such extreme number of lane needs and therefore the growth projections are more than reasonable for purposes of forecasting trips through the year 2040. We recommend maintaining the proposed growth rate caps, with the exception of the HEFT facility which has been requested by the Florida's Turnpike to use their provided rates.

**FDOT No. 21:** Page 48, Table I-14: Please label and explain the difference between the 1st and 2nd columns labeled as "Referenced Intersection % Growth". It appears in the Appendix that there are two sets of intersection growth rates for the two Phases (Phase I and Phase II). Please define the Phases in a footnote and label the column appropriately.

Headers will be included in the updated report that identify the two columns as respectively 2015-2020 and 2015-2040 percent growth rates. Column headers match with the column headers from the Appendix I-J which detail initial growth percentages based on the roadway link historically observed growth rates which served as the basis for the development of the estimates presented in Table I-14.

**FDOT No. 22:** Page 53-54, Table I-16: Please check for missing intersections and revise as necessary. Only Intersections 16 through 54 are provided.

Please refer to response to FDOT Comment No. 6 which addresses the missing page.

## **Chapter 1, Section 9 - Project Trip Distribution**

**FDOT No. 23:** Socio-economic data was factored to match the daily ITE trip generation calculations for the external trip quantities. How was this performed? The model plots show % trips from the select zone analysis but not the model volumes in Appendix I-M. Please include model volume plots for this select zone analysis.

**The model does not automatically produce the same trip generations as were prepared for the ADM and the Graham sites based on ITE and MOA field studies since the model relies on its own trip generation procedures. The initial SERPM model trips generated for the ADM and the Graham TAZs were adjusted to ensure that the final assigned traffic volumes from these TAZs match with the daily trip generation forecasts presented in Tables I-9 and I-10, respectively. Select zone model volume plots will be added to Appendix I-M of the updated report.**

**FDOT No. 24:** Please provide the methodology for determining the number of households with and without children and vehicle ownership for the Graham Property households where there were not households previously.

**The number of household statistics were based on the existing TAZ referenced for the Graham Project and a review of nearby TAZs. Appendix I-L provided a summary of the original versus revised TAZ household characteristics.**

**FDOT No. 25:** Consistent with the traffic methodology, a new TAZ was created for ADM to force access to HEFT and NW 170th Street. There appears to be a centroid connector near the HEFT and NW 170th Street in the submitted material, though it is not identified as an ADM TAZ and the percent distribution is not depicted. When adding the percent trips on the centroid connectors for the ADM TAZ in Appendix I-M, the percentage sums to only 70% indicating that the other 30% is distributed from the new centroid. Please identify the number of the TAZ added near HEFT and NW 170th Street and what socio-economic data was assigned. The table in Appendix I-L should be updated to reflect this TAZ. Additionally, please denote the TAZ with a star for ADM on the map in Appendix I-L.

**Appendix I-L does include both the "main" ADM and the near HEFT/NW 170th 30% ADM TAZs. It should be pointed out that TAZ 2705 is incorrectly shown in the appendix table titled "Platted Parcels in the Cities of Hialeah Gardens, and Unincorporated Miami-Dade County and Potential Development" but should in fact be TAZ 2748. The table will be refined and the new plots to be provided in an updated Appendix I-M will show the HEFT/NW 170th 30% ADM TAZ.**

**FDOT No. 26:** Please include model plots from the newly created ADM TAZ near the HEFT and NW 170th St interchange showing the select zone analysis in both model volumes and percent of project traffic volumes. This will serve as a check that this methodology for matching the expected regional long distance trip making characteristics works as intended.

**A separate select zone analysis will be prepared for the ADM TAZ located near the HEFT/NW 170th Street interchange. The resulting model plots will be added to Appendix I-M. Three separate plot sets will be provided for respectively the Year 2020 Land Use on 2020 Network, the Year 2040 Land Use on 2020 Network, and the Year 2040 on 2040 Network. Please note that additional manual adjustments were included for the Florida's Turnpike/HEFT/SR 821, the Florida's Turnpike/SR 91, and I-75 to increase the regional distributions and extend the trips beyond the SERPM6.5 subarea model area.**

**FDOT No. 27:** On page 63, a typographical error was noted. References to Table I-8 and Table I-9 should be changed to Table I-9 and Table I-10 instead.

**The ADM and the Graham trip generation table references within the text will be corrected to reflect Tables I-9 and I-10, as correctly noted in the above comment.**

### **Chapter 1, Section 10 - Project Assignment**

**FDOT No. 28:** Page 58, 60, and 62, Figures I-10B, 11B, and 12B: Please explain why no traffic to/from the Graham Project is assigned for the link of NW 170th Street from NW 102nd Avenue/NW 107th Avenue to NW 97th Avenue, particularly since there is an access point at the location of NW 102nd Avenue/NW 107th Avenue. The 0.0% value is present for both 2020 and 2040 project distributions.

**The model distribution for the referenced roadway link is zero percent due to the fact that three different centroid connectors are available for trips to exit the Graham TAZ. The model assigns the trips based on the "quickest" path. Acknowledging that there will be travelers exiting Graham via the referenced roadway segment, a manual adjustment will be made to the trip distribution figures and the future year roadway link analyses and will be subsequently included in the updated report.**

**FDOT No. 29:** Page 58, 60, and 62, Figures I-10B, 11B, and 12B: Please explain why no traffic is assigned to/from the link of NW 170th Street from NW 82nd Avenue to NW 78th Avenue when both the links to the east and west have project traffic assigned to them.

**Based on the available roadway network, the trips are choosing to take alternate routes to by-pass the indicated roadway link (please refer to the Appendix I-M model plots. No changes are deemed necessary for the analyses since minimal trips are distributed within this general area.**

**FDOT No. 30:** Page 63, Table I-17: Please check the percent distribution values for the link of NW 178th Street between Graham Access and NW 97th Avenue. The values do not match those shown in Figure I-10B.

**The information presented in Table I-17 is correct. Figure I-10B is simply missing the ADM and the Graham percent distributions for this roadway segment. The same applies for Figures I-11B and I-12B. All three figures will be updated to include the missing percent project distributions.**

### **Chapters 2 through 4 – Link Analysis**

**FDOT No. 31:** The use of ADM or Graham Property traffic should not be included as "background" traffic in the analysis when determining if a facility is backlogged. The determination of backlogged facilities must be re-done to include only approved background traffic. Throughout the submitted analysis, it is stated that backlogged facilities include traffic generated by either ADM or Graham Property, depending on which project was being analyzed. This means that links which fail due to trips from Graham property or ADM are considered backlogged and not subject to mitigation. This approach to evaluating backlogged facilities is included in the Zoning Link Analysis and CDMP analysis tables in Chapters 2 through 4. Below are examples of roadways identified as backlogged facilities (and failing) because of either ADM or Graham Property traffic.

- a. *I-75 from Miramar Parkway to Florida's Turnpike (Table III-5A)*
- b. *I-75 from Miramar Parkway to Florida's Turnpike (Tables III-5B and III- 5B)*

- c. *I-75 from Florida 's Turnpike to Miami Gardens Drive (Tables II-5B and III-5B)*
- d. *Okeechobee Road from Hialeah Gardens to NW 103rd Street (Tables II-5B and III-5B)*
- e. *Okeechobee Road from NW 103rd Street to SR 826 (Tables II-5B and III-5B)*
- f. *Miami Gardens Drive from I-75 Eastern Ramps to NW 87th Avenue (Tables II-2B and III-2B - )*
- g. *Miami Gardens Drive from NW 87th Avenue to NW 82nd Avenue (Tables II-2B and III-2B)*

**The June 22, 2016 approach for generating background traffic included the approach that the other Project was part of the background traffic and therefore was used to identify the traffic impacts for the other Site. As indicated in the introduction to the Comment Response Set, the request to include Graham project trips for the ADM analysis was first introduced in October 2015 as part of comments received from respectively FDOT, Southeast Florida Regional Planning Council, and the City of Hialeah and the Graham trips were included in the analysis presented in the December 22, 2015 CDMP TIA, following addendum to add the Graham Project to the methodology originally derived for the ADM site. As late as May of 2016, a summary of the different analysis scenarios were shared with Miami Dade County.**

**The June 22, 2016 includes the Combined ADM and Graham analyses, as per the understanding of the applicant, and does show the overall traffic impacts associated with both projects being in place. The intent of this Chapter was to comply with the agency request but was not intended to override the individual Projects' approach of analyzing the other site as background traffic. Therefore the statement that the results were for "informational purposes only" was included.**

**In order to comply with agency concerns and to ensure that the CDMP applications remain on schedule, revised analyses will be prepared to review each Project relative to background traffic without the other Project. Furthermore, the analyses will be updated with new traffic counts as per agency comments, adjustments to the roadway improvement tables also per agency comments, and further review of individual segments to ensure that the latest most appropriate assumptions are being applied.**

**FDOT No. 32:** It was noted in several tables in Chapter 4, particularly Tables VI-5A, VI-5B, and VI-6B, that two segments of I-75 fail in 2020 and 2040 because of ADM and Graham Property traffic. Yet these two segments (I-75 from Miramar Parkway to Florida's Turnpike, and I-75 from Florida's Turnpike to Miami Gardens Drive) are not listed in Mitigation Summary sections or the Executive Summary of the report. Planned improvements to both I-75 segments will increase capacity to accommodate background growth traffic through 2040 and allow the roadway to operate at an acceptable level of service. However, the addition of ADM and Graham Property traffic causes these I-75 segments to fail, according to the submitted analysis. As a result, please identify the necessary improvements for these two I-75 segments to allow them to operate at an acceptable level of service with both project's traffic, and include these improvements under each Mitigation Summary section of the report.

**Please see response to FDOT Comment No. 31 above.**

**FDOT No. 33:** In Chapters 2 through 4, the volumes and lane geometries for various roadways segments for the 2020 and 2040 Zoning and COMP analysis tables differ. When comparing Table II-5A (2040 CDMP Analysis) with Table II-6A (2040 Zoning Analysis) the total trips for a particular roadway segment are not the same. In some cases, the number of lanes (CF + proposed) are different. For example, SR 826 shows 10 lanes in the zoning analysis for 2040 and 10+4/12+4 in the CDMP analysis for 2040. Also, the segment of Florida's Turnpike from SW 8th Street to SR 836 was assigned 311 combined northbound trips for the 2040 PM peak hour CDMP analysis, but only 307 combined northbound trips for the 2040 PM peak hour Zoning analysis.

Please clarify the apparent project trip assignment and roadway geometry inconsistencies and revise the analyses, as appropriate.

**The 2040 CDM and the 2040 Zoning analyses represent two different traffic assignments and thus analyses. For the 2040 CDM analysis, the year 2040 SE data is assigned on the cost feasible network (a.k.a. 2040 network); whereas for the 2040 Zoning analysis, the year 2040 SE data is assigned on just three years of committed roadway improvements similar to the previously utilized "DRI" methodology (a.k.a. year 2020 network). As a result there are two different project percent distributions (Figures I-11A/B vs. Figures I-12A/B) and two different project assignments (as noted by the reviewer). This also explains why there are differences in the number of lanes, and corresponding roadway capacities, shown in the two sample tables as mentioned in the above comment. For the 2020 CDM and the 2020 Zoning analyses, the results are identical since both rely on year 2020 SE assigned on the 2020 network. Accordingly, no changes are necessary to the analyses presented in Chapters 2 through 4.**

**FDOT No. 34:** The Mitigation Summary in each chapter does not include intersection mitigation. Please add the intersection mitigation summary to this section. This summary is included in the executive summary but does not differentiate between Graham and ADM responsibilities.

**Intersection mitigation summaries will be added to Chapters 2, 3, and 4, as requested. Mitigation responsibilities between the two Sites will be identified as well.**

**FDOT No. 35:** Please revise the analysis of backlogged facilities such that ADM and Graham Property project traffic are not considered as background traffic. In the Intersection ADM Mitigation Summary appendices (II-I, II-J, III-H, III-I), items that are significant are highlighted in yellow. In some cases (e.g., NW 186th Street / Miami Gardens Drive & NW 57th Avenue) mitigation is proposed for turning movements, which includes traffic impacts from both ADM and Graham Property. Intuitively, if both projects contribute significant traffic impacts to a turning movement requiring mitigation, then the mitigation costs should be shared between the two developments. Please clarify how the projects included in the intersection needs of the executive summary were determined to be significantly impacted by ADM and Graham Property developments.

**The updated CDM report will include reanalysis of all intersections including updating default assumptions, as referenced in earlier FDOT comments. Results will be summarized in each Chapter mitigation section and the Executive summary as requested.**

**FDOT No. 36:** In comparing Table II-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – ADM Impacts and III-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – Graham Impacts, the LOS with both ADM and Graham Property included do not match. Given that this column should include all trips from both projects, it is expected that the LOS would be the same. Please correct the apparent discrepancy.

**Correct, the intersection LOS values for the two tables should match for the final column with total traffic volumes included when the total volumes are the same, as was the case. In line with the approach to no longer include the other Project as background traffic, the updated intersection analyses outputs will no longer have the same results since there will only be one set of analyses which will be presented (namely the Combined Scenario and for respectively the Year 2020 and the Year 2040 Zoning analyses). These with Combined intersection results, along with the intersection spreadsheets which summarizes individual Project trips, will serve as the basis for identifying the impacts associated with the ADM and the Graham Sites.**

**FDOT No. 37:** Page 83, Table II-4 and Page 112, Table III-4: Please check LOS values for Intersection ID 9 (NW 57th Avenue at Miami Gardens Drive), and explain why this intersection operates better with the additional project trips than with just the background traffic only.



**The intersection should not in theory operate better for the With Project trips than the With Background Only trips but did in few cases due to the fact that individual signal timings were revised. We acknowledge that there were a few cases which should have been better analyzed.**

**FDOT No. 38:** Page 95, Table II-7 and Page 156, Table IV-7: Please check LOS values for Intersection ID 16 (SR 823/Red Road at Turnpike Ramp (E)), and explain why this intersection operates better with the additional project trips than with just the background traffic only.

**Please see response to FDOT Comment No. 37.**

**FDOT No. 39:** Table II-7 is included in both Chapters 2 and 3. Chapter III is specific to the Graham property but the Table II-7 states it is for the ADM impacts. The table appears to be identical including the headers of the table. Please replace Table II-7 in Chapter III with the correct Table III-7.

**The table will be updated to correctly reflect the intersection LOS results for the Scenario being analyzed.**

**FDOT No. 40:** Table II-7 states "Zoning Short Term (Year 2040)." Please change to "Zoning Long Term (Year 2040)."

**The table name will be revised as indicated.**

#### **Chapter 2, Section 8 - Mitigation Summary**

**FDOT No. 41:** Page 127, Second Paragraph (sentence before bulleted list): Please clarify if the listed improvements are for the ADM and/or Graham Project. ADM is referenced twice in the noted sentence. This also occurs again on Page 149 in the same location under Section 6.0 Mitigation Summary.

**The text for the Chapters II, III, and IV Mitigation summaries will be updated to state that "A summary of the improvements proposed as part of the study area roadway improvement plan for American Dream Miami and the Graham Project are summarized below and reflect those improvements that are baseline for the two projects, prior to reviewing additional mitigation needs:"**

#### **Chapter 3, Section 5 –Year 2040 AM and PM Zoning Analyses**

**FDOT No. 42:** Page 116 – 119, Tables III-5A & 5B: Please check for an error in the font color for columns under Background Trips Peak Hour Peak Dir Analysis NB/EB (Vol/LOS). Not all values in red font are failing.

**The font color will be refined to ensure that just those LOS values which exceed the adopted LOS are indicated as red.**

#### **Missing Tables**

**FDOT No. 43:** There appear to be several tables missing from the submittal package (see cursory list below). Please revise the report to include all summary tables.

- a. The first half of Table II-3B is missing*
- b. The first half of Table II-5A is missing.*

- c. *The first half of Table II-6B is missing.*
- d. *Table III-5B should be renamed "Table II-5B" to be consistent with the report's naming conventions.*
- e. *The first half of Table III-3B is missing.*
- f. *The first half of Table III-6A is missing.*

**Please refer to response to FDOT Comment No. 6 in regards to the pages missing. Item d will be revised to "Table II-5B."**

### **General Synchro Comments**

**FDOT No. 44:** After reviewing the output from the Synchro analyses there are some discrepancies in the inputs used for the existing and future conditions.

- a. *The peak hour factor for all intersections/approaches was used the default value. Was this discussed and agreed upon during the methodology agreement?*
- b. *Cycle length/offsets and minimum initial (minimum green) did not correspond to Miami Dade County Signal Systems TOD sheets. Also please provide the Signal Timing sheets used as reference for the Synchro inputs within the appendix area.*
- c. *It is not possible to verify the truck percentage used in the analyses due to the output sheets provided. It is important to account for this input in the Synchro analyses. Please provide both the methodology and process for how the truck percentage was chosen for the approaches or intersections and provide the appropriate HCM output from Synchro.*
- d. *For the reference (yield) point, "beginning of green" is used for actuated- coordinated intersections. Was this verified with the Miami Dade County area engineer for these signals? Typically, the majority of signals in the County have a reference point of "beginning of yellow" for the main movements. Please check data and update the analyses with the correct input.*
- e. *Some intersections between the existing conditions and future analyses get switched from actuated-coordinated operation to uncoordinated in the future. Please clarify the reason for this change.*
- f. *For the future analyses, was the signal timing optimized for the "without mitigation" and the "with mitigation" scenarios? Please clarify when optimization was used and if there were any manual adjustments to the timing or other system parameters for the Synchro files.*

**All changes requested above will be included in the updated intersection analyses. For the peak hour and the truck percentages, the factors are based on local traffic counts. The peak hour factors will be included in the updated intersection volume spreadsheets (Appendix I-K) and the development of truck factors will be included in a new appendix. Miami Dade County Signal System TOD sheets will also be included in a new appendix. For all other comments relating to signal timing, please refer to response to FDOT Comment No. 12.**

### **MIAMI-DADE COUNTY TRANSIT, DATED AUGUST 26, 2016 (Revision No. 6):**

Miami-Dade County has submitted a report titled "Transit Impact Report" for CDMP Applications the for ADM and the Graham Projects which outlined the forecast transit needs for the two Sites, along with estimated annual operating costs.

**The applicant acknowledges receipt of the transit report and intends to work jointly with the County to address transit needs and requirements associated with the two Sites.**

## FLORIDA'S TURNPIKE DISTRICT, DATED AUGUST 26, 2016:

The County can consider the District's comments representative of important Turnpike input as well, with regard to the applicant's submittal. A couple of additional Turnpike facility specific comments are provided below:

**Turnpike Comment No. 1:** Turnpike projects on the Homestead Extension of the Florida's Turnpike (HEFT), south of SR 836 (inclusive of managed Express Lanes) are let for construction (Design-Build). The analysis should include these projects.

**The proposed improvement tables will be updated to include the mentioned additional project (TIP 435543-1) and the analysis will likewise reflect the improved number of lanes. The applicant has prepared an updated review of the most recent Transportation Improvement Plans for respectively Broward and Miami-Dade Counties and will be updating Tables I-11 and I-12 accordingly.**

**Turnpike Comment No. 2:** Turnpike has additional count/toll information available which is not included in the FDOT FTI. The availability of this information was shared with the applicant during the methodology meetings but was not requested by the applicant for the preparation of the analysis.

**The applicant appreciates the Turnpike's offer to supply additional traffic count information and has reached out to request those counts so they can be reflected in an update of the June 22, 2016 report.**

**Turnpike Comment No. 3:** HEFT, in the project vicinity, has sustained considerable growth rates (with the exception of recession years). The calculated annualized growth rate (which included recession years) from 2000 – 2015 is 3.5% north of SR 836 and 3.0% south of SR 836. The development of growth rates for this facility should be assessed independently of the other limited access facilities. Information from the Turnpike's Annual evaluation is provided below for information/reference.

### North of SR 836

Weighted Average Growth Rate																Trend		'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015	
45,400	51,100	53,800	59,700	64,600	68,500	71,900	75,200	74,600	73,000	75,500	76,200	78,400	77,900	81,400	89,600	52,051	87,549	3.50%
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015				
12.60%	5.30%	11.00%	8.20%	6.00%	5.00%	4.60%	-0.80%	-2.10%	3.40%	0.90%	2.90%	-0.60%	4.50%	10.10%				

### South of SR 836

Weighted Average Growth Rate																Trend		'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015	
48,700	53,300	55,600	60,300	70,300	77,400	81,100	82,200	76,900	72,600	74,300	76,200	78,300	80,400	83,700	90,500	56,598	88,627	3.00%
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015				
9.40%	4.30%	8.50%	16.60%	10.10%	4.80%	1.40%	-6.40%	-5.60%	2.30%	2.60%	2.80%	2.70%	4.10%	8.10%				

**Follow up Comment Dated Sept. 14, 2016:** Please note, that the incorrect summary portion of the growth workbook was submitted with the Turnpike's original comment. The correct annualized growth south and north of SR 836 are 2.4 and 3.0%, respectively."

North of SR 836

Weighted Average Growth Rate																Trend	
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015
48,700	53,300	55,600	60,300	70,300	77,400	81,100	82,200	76,900	72,600	74,300	76,200	78,300	80,400	83,700	90,500	56,598	88,627
'00-'15 Average Growth	Annual Average Growth (%) Based on Weighted Volumes																
	2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015		
	3.0%	9.4%	4.3%	8.5%	16.6%	10.1%	4.8%	1.4%	-6.4%	-5.6%	2.3%	2.6%	2.8%	2.7%	4.1%	8.1%	

South of SR 836

Weighted Average Growth Rate																	Trend	
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015	
86,100	89,900	99,000	105,400	113,500	120,700	127,900	131,500	123,400	119,300	122,300	124,900	125,700	127,900	131,100	137,200	97,385	138,340	
'00-'15 Average Growth	Annual Average Growth (%) Based on Weighted Volumes																	
	2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015			
	2.4%	4.4%	10.1%	6.5%	7.7%	6.3%	6.0%	2.8%	-6.2%	-3.3%	2.5%	2.1%	0.6%	1.8%	2.5%	4.7%		

The growth rates provided with the Turnpike's comment have been reviewed and the analyses will be updated to reflect the referenced 3.0 and 2.4 percent historical growth rates for HEFT, as requested.

## BROWARD COUNTY, DATED SEPTEMBER 1, 2016:

**Broward County Comment No. 1:** It is unclear how the 10.8-percent upward adjustment for light rail transit (LRT) resulted in the addition of 6,481 daily trips and 491 PM peak hour trips. These values do not agree with our calculations. Please provide a worksheet outlining the LRT adjustment calculations and please provide backup for any assumptions accepted for this adjustment.

There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the LRT, was scrutinized to a great extent and does not warrant further review. Also refer to response to FDOT Comment No. 15.

**Broward County Comment No. 2:** It is maintained in the study that the hotel component is an ancillary/complementary land use and was reflected in the trip generation estimates for ADM derived from count data collected at Mall of America (MOA). It was further stated in a reply to a previous comment about the hotel component that the ADM site is not near other Miami-Dade attractions such as the beaches or airport and therefore is not expected to generated trips other than visitors to ADM. In response to the ancillary/complementary land use comment, MOA has 506 rooms on-site to accommodate approximately 4,400,000 square feet (SF) of gross floor area (GFA), or about one room per 8,700 SF of GFA. ADM is proposed to have 2,000 rooms for 6,200,000 SF of GFA which equates to one room per 3,100 SF of GFA. Proportionally, ADM will have 2.8 times more hotel rooms per SF of GFA than MOA and accordingly, it is not reasonable to expect that all guests will be visiting the hotels as an ancillary use of ADM. With regard to the response that the location of ADM is not near other Miami-Dade attractions, it should be noted that there are at least four hotels comprising over 500 hotel rooms in the Miami Lakes Main Street area, located within two to three miles of the site, also similarly remotely located from the airport and beaches. Therefore, it is not a reasonable assumption that the project's hotels will not generate trips other than ancillary to ADM. Furthermore, as the area develops with other planned and committed projects, the demand for hotel rooms will increase. For the above reasons, we continue to recommend that an adjustment to trip generation be made to account for hotel visits not specifically associated with ADM.

There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the land use and corresponding trip generation assumptions, was scrutinized to a great extent and does not warrant further review. Furthermore, we should point out that the premise of the comment that the 506 room hotel at MOA is adequate to meet demand at MOA is incorrect. MOA

has identified a higher demand for hotel rooms and the 2006 approved expansion plans currently in progress include three (3) additional hotels adding 1,250 rooms for a total of 1,756 rooms. Further, the 2012 Cambridge Systematics survey at MOA reported that 19% of the MOA visitors arrived from nearby hotels/motels. This was all accounted for in the trip generation negotiations.

**Broward County Comment No. 3:** The analysis shows that Miramar Parkway west of I-75 operates at Level of Service (LOS) C and will continue to do so for future conditions. This was brought up in our previous comments and the response was that the analysis was based on 2014 traffic count data. 2015 traffic counts for the intersection of Miramar Parkway and Dykes Road/SW 160 Avenue (Attachment A) indicating that Miramar Parkway is currently operating overcapacity. Furthermore, Synchro analysis (Attachment B) shows that during the PM peak, the intersection of Miramar Parkway and Dykes Road operates at LOS F.

**The analysis will be updated to reflect the furnished updated traffic count data for Miramar Parkway and the analyses will be revised accordingly.**

**Broward County Comment No. 4:** During the review meeting held at SFRC on January 22, 2016, there was discussion of extending transit to this site and construction of park and ride facilities. Whist Miami-Dade Transit will be the primary service provider, staff would encourage the applicant to explore option for transit service north of the site with Broward County Transit. Transit riders are likely to employees working in retail, hotel and park components of the project. South Broward County has many residential neighborhoods which would be included in the future labor pool.

**Comment and request noted. Additional efforts will be coordinated in regards to transit for the two sites and will be addressed.**

## **MIAMI-DADE COUNTY DTPW, DATED SEPTEMBER 7, 2016:**

**County DTPW Comment No. 1:** Executive Summary: Please explain the 220 [sic 22] various scenarios listed for the intersection analyses. It would appear that only 18 scenarios would be required, 9 alternatives for both AM and PM Peak Hours: 1-Existing, 2 & 3 - Future No-Build (2020 & 2040), 4 & 5- ADM Alternative Only (2020 & 2040), 6 & 7 - Graham Project Alternative Only (2020 & 2040), 8 & 9 – Total Combined Projects (2020 & 2040).

**The above listed 18 scenarios do not take into account the fact that there were also the Year 2020 and Year 2040 Background with ADM and the Year 2020 and Year 2040 Background with Graham intersection analyses submitted as part of the June 22, 2016 report. This approach is no longer being pursued based on agreement coordinated with local agencies, so the total intersection analyses for the updated report will indeed be fewer than the listed 22 analyses.**

**County DTPW Comment No. 2:** Section 1-Overview: What is the difference in the CDMP versus the Zoning analyses? From a traffic analysis perspective, the concern mainly exists with the worst-case scenarios. Please advise.

**A more detailed description will be included in the Executive Summary to distinguish between the CDMP, the Zoning, and the Concurrency analyses. Reference will also be made in the document to the email that was provided to Mark Woerner on August 11, 2016 in response to a request for a detailed overview of the differences between the CDMP and the Zoning analyses. The referenced correspondence will be added to the Appendix.**

**County DTPW Comment No. 3:** Figure I-3 through 6: Please zoom into the study area and identify the highlighted roadway segments with their street names.



Roadway names will be added to all figures and will be based on the roadway segments that are presented in the various roadway link LOS tables. For all the figures, one consistent roadway description will be chosen for each facility. Due to space limitations, it is not possible to provide all the possible roadway names associated with each facility. Coordination will be made to ensure that the depicted roadway name is consistent with at least one of the roadway names referenced in the various roadway link LOS tables (all of which are consistently named). Notably, the link tables have more space and thus allow the possibility of listing not only local roadway names but also state roadway numbers.

As far as zooming into the study areas, the figures were designed and thus sized to show all roadways links which are being analyzed in the tables. Furthermore, all study area links which meet the 5 percent significance test do for the most part extend to near the boundaries of the base maps used for Figures I-3 through I-6; acknowledging that the study areas for the 2040 on 2040 assignment has a broader range than say the 2020 on 2020 assignment. To accommodate the County's comment, we will make a definite effort to prepare zoomed in maps so that the information presented is more legible. This will include the addition of roadway names as requested in other comments.

**County DTPW Comment No. 4:** Section 6.2-Existing Roadway Link Directional PHPs: Please clarify and provide an example for the following statement:

*“For the MDC counts, the PHPs were ratio'ed to the official PHPs identified by the County in its count reports and the directional distributions observed from the raw counts were then used to derive northbound/eastbound (NB/EB) and southbound/westbound (SB/WB) PHP directional volumes.”*

At the request of County staff, a detailed breakdown of the development of PHPs from raw traffic counts (and further to future year background volumes) were detailed in a document furnished to the County on July 18, 2016. The referenced description will be included in an appendix within the updated report for reference purposes for the various review agencies.

To clarify further, depending on whether the raw count had the AM or the PM volume as being the highest, the raw volume was set to represent the highest period and thus assigned the official PHP volume. For example if the highest period occurs during the AM period, then the analyzed AM total PHP volume equals the official PHP. For the same example, the PM PHP is calculated by multiplying the official PHP by the ratio of the raw PM to the raw AM total volumes resulting in a lower volume than the official PHP. For both the highest peak and the other peak, the directional distribution is obtained based on the raw volume splits. A sample calculation will be included in the updated report.

**County DTPW Comment No. 5:** Section 6.3-Existing Roadway Link Directional LOS: Please provide the data assumptions for the roadway segments used to determine the maximum service volume thresholds. Also, there were no FDOT tables included in Appendix I-C, only Intersection TMCs.

A table will be included in the updated report which will detail how each service volume was derived (e.g. existing, 2020, and 2040 roadway networks). Specifically, where available the County's RER database for DOS trip capacities were used as an initial reference for the peak hour service volume (with the understanding that the County has not formally updated information in its database other than the DOS trips). A representative FDOT 2012 LOS Handbook peak hour service volume was then assigned ensuring that the service volume at least equaled or were lower than the County's capacities. Next the corresponding peak hour peak directional service volume was selected to serve as the basis for the capacity volumes utilized. As such, in some cases the County's capacities were applied to adjust FDOT service volumes so that the LOS D or LOS E capacity was set to equal that in the database. FDOT facilities were developed following traditional FDOT requirements using their LOS Handbook.

**County DTPW Comment No. 6:** Table I-4: The PM LOS is missing for ID #10. Also, please show the intersection delays for all the LOS Summary tables throughout the report.

**Noted.** The updated table will include the LOS value for this cell along with requested intersection delay information.

**County DTPW Comment No. 7:** Table I-10: The Diverted Trip to Retail Use volumes which were calculated from the ITE Trip Generation Handbook Pass-by Trip volumes for Land Use Code 820 are only valid for the PM Peak Hour since the data was collected for a weekday during the PM Peak Period. No diverted trips should be calculated for the Daily or AM peak analysis. Furthermore, caution should be exercised when using the pass-by fitted curve equation in lieu of non-pass-by trip data as listed in Table F.9 from the ITE Handbook, which includes diverted trip percentages.

**The trip generation tables will be updated to reflect that there are no diverted AM nor Daily trips, though in reality diverted trips occur throughout the day.**

**County DTPW Comment No. 8:** Table I-10, Note 2: This states that “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.” The table shows the net external trips with the pass-by reductions. Please advise if the pass-by trips were reduced only for the existing roadway facilities. The traffic at the sites’ driveways and new roadways must show 100% trips as these are all new.

**Passer-by, also referred to as diverted trips, were exclusively applied to the roadway segments highlighted in green throughout the various roadway segment LOS analyses (e.g. where 10 trip generations information from Tables 9 and Table are being applied to derive Project trips for comparison to available LOS capacity). The specific segments which have diverted trips occur on portions of NW 102nd Ave, Miami Gardens Dr, NW 170th St, NW 97th St, and NW 178th St. These roadways near the site are indeed based on the 100% percent trips and the percent distribution is applied to the trip generation without reduction for diverted trips.**

**County DTPW Comment No. 9:** Section 8.3-Background Growth: According to ITE Transportation Impact Analysis for Site Development, growth rates should not normally be employed for horizons beyond 4 to 5 years (i.e. through 2020) because of the variability in growth rates over time and the magnitude of error that can result from a relatively small error in the growth rate over a long period of time (such as using these to generate 2040 volumes).

**Acknowledged.** Since the beginning of the CDMP efforts, growth rates have been the premise for deriving future background volumes. It was recommended as part of the methodology efforts and was subsequently incorporated into both the December 2015 and the June 2016 CDMP reports submitted to the County. Furthermore, caps were set on the growth rates so as to make sure that growth would not continue to be elevated all the way through the year 2040 for those cases where high historical growth rates have been observed in recent years. As such, we recommend maintaining the approach with the capped growth rates (with the exception of the Florida's Turnpike which has provided separate growth rates that they wish to have applied based on their historical growth review).

**County DTPW Comment No. 10:** Table I-16: the first half is missing for ID # I-15.

**The applicant acknowledges that in a number of cases the first half of tables containing two pages were missing (also see response to FDOT Comment No. 17). We apologize for the discrepancy.**

**County DTPW Comment No. 11:** Figures I-10A through 12B: Please explain the major differences in the project distribution percentages between the Zoning and CDMP analyses. For example, the ADM Project Distribution on Figure I-11B is 23.41% for the north-south 4-lane segment near the Graham project. This same link however, is listing a 43.19% ADM Project Distribution in Figure I-12B. Otherwise, most of the percentages are similar to their counterparts as compared in the figures.

**The 2040 CDMP and the 2040 Zoning analyses represent two different traffic assignments and thus analyses. For the 2040 CDMP analysis, the year 2040 SE data is assigned on the cost feasible network (a.k.a. 2040 network); whereas for the 2040 Zoning analysis, the year 2040 SE data is assigned on just three years of committed roadway**

improvements similar to the previously utilized "DRI" methodology (a.k.a. year 2020 network). As a result there are two different project percent distributions (Figures I-11A/B vs. Figures I-12A/B) as noted by the reviewer.

Furthermore, the two Project sites have different trip making characteristics. The ADM will be marketed as a major attraction whereas the Graham represents a combination of more traditional employment and residential land uses. Most of the larger differences in trip distributions between the two Sites occur in the nearby vicinity of their properties which makes sense. For the longer trips, in the majority of cases, the distribution is more similar.

**County DTPW Comment No. 12:** Section 10-Project Assignment: The diverted trips for the TMVs shown are not shown in detail in Appendix I-K. Please include separate figures to show these volumes.

**The diverted trips only apply to select roadway segments, as indicated in response to DTPW Comment No. 8. None of the intersection analyses are impacted by the distinction between having either the with versus the without diverted trips reflected in the trip generation. All intersection project trips are based on diverted trips excluded from the trip generation and therefore a separate set of figures is not necessary nor are they needed to be shown specifically in the Appendix I-K spreadsheet summaries.**

**County DTPW Comment No. 13:** Table IV-7: This table is numbered IV but should be sequentially numbered VI. Also, this is titled 'Zoning Short Term (Year 2040)' but should be Long Term. Also, please confirm that the signal cycle lengths used in the future analyses were the same as existing. Any deviation from these needs to be documented.

**Acknowledged. Corrections will be made as indicated. The cycle length will be updated such that all future analyses reflect the existing cycle lengths.**

**County DTPW Comment No. 14:** Mitigation Summary (all scenarios): Please ensure that the future LOS intersection analyses does not include improvements at the intersections, such as additional/increased turn bay storages, signal optimization, etc. A comparison of the Future No-Build and Build scenarios needs to be evident. A separate LOS analysis should be made for those intersections requiring mitigation. Also, were there any unsignalized intersections that were identified for signalization in the future?

**The only future mitigation improvements which will be applied are to maximize the intersections to two left turns, three throughs, and one right turn. No additional mitigations will be applied. Also, the signal timings will no longer be adjusted to serve as a means for mitigating intersection operations. Before and after mitigation LOS analyses were indeed included in the June 22, 2016 TIA and will be included in the updated report. Finally, there was no unsignalized intersections included in the analyses.**

**County DTPW Comment No. 15:** Appendix I-K1: Some of the turning movement volumes do not appear to be adding up correctly. For example, assuming a 1% growth rate from existing to 2020, the background volumes for the AM WB through movement at NW 87<sup>th</sup> Avenue and Miami Gardens Drive should be 1,544; and then adding the ADM and Graham project trips should result in 1,637 instead of 1,621. Please clarify. Also, why are the peak directions different for the two projects during the same peak period?

**The turning movement volumes will be reviewed to ensure that they add up correctly. The differences in the direction of the trips for the two Site's is due to the differences in the land uses and therefore the trip making characteristics. For the ADM Site's, the PM period has inbound as the highest direction (60%) and AM has outbound as the highest (52%). For Graham, PM has outbound highest (54% and 60%) and AM has inbound highest (59% for 2020 and 71% for 2040).**

## **MIAMI-DADE COUNTY RER, DATED SEPTEMBER 7, 2016:**

### **General Comments**

**County RER Comment No. 1:** For each application, include a proportionate share analysis that identifies the applicant's fair share of the cost of the required transportation improvements.

**Fair share will be provided in the updated report.**

**County RER Comment No. 2:** Number all of the pages in the report, including tables and maps.

**Page numbers will be provided on all pages of the report and the appendices.**

**County RER Comment No. 3:** Some pages appear to be missing, i.e. pages 54, 69, 85, 90, 97, 114, 126, 155, and 156.

**Please refer to response to FDOT Comment No. 6 regarding the missing of the first page for a number of the tables. The updated report will be reviewed thoroughly to ensure that no pages are missing.**

**County RER Comment No. 4:** All tables, maps, and corresponding roadway analyses must show all the roadway segments impacted by 5% or more by the projects' impact.

**All the tables and maps include at a minimum all roadway segments with 5% or more significance. In fact, the analyses extend beyond one link outside of the 5% study area to ensure that a thorough inclusion of roadway segments were included.**

**County RER Comment No. 5:** All maps and tables need to be labelled to show the major roadways and corridors, and identify all the state roadways.

**All maps will be updated to include, at a minimum, all names for all roadways which are included in the analyses. State road names will also be added where applicable. Please also refer to response to DTPW Comment No. 5 which describes the premise for how the naming will be included on the figures.**

**County RER Comment No. 6:** List all roadway segments in an orderly fashion from north to south and west to east.

**For logistical purposes, we are unfortunately not able to accommodate the request to reorganize link LOS tables so that all roadways are listed from north to south and from east to west. The tables provided in the report are based on extensive Excel files which have in excess of 40 different tabs with linked formulas and information and it simply would be nearly impossible to restructure everything to accommodate what would otherwise be a simple and logical request.**

**County RER Comment No. 7:** The roadway links for the existing and year 2040 should correspond to the maps.

**Please refer to other County comments relating to roadway links and their naming coordination between Tables and Figures.**

**County RER Comment No. 8:** Only projects listed in the Cost-Feasible Plan of the County's 2040 Long Range Transportation Plan (LRTP) should be considered for future 2020 and 2040 analysis.

**Acknowledged, Tables I-10 and I-11 have been updated to ensure that only Cost Feasible Plan projects are included. The analyses have been updated accordingly.**

**County RER Comment No. 9:** Reference to "FDOT Comments" refers to FDOT's letter dated August 5, 2016.

**Acknowledged.**

**County RER Comment No. 10:** RER staff reserves the right to provide additional comments later and will continue to finalize review of the Revised Traffic Impact Analysis (TIA).

**Acknowledged.**

## **Page 1, Executive Summary**

**County RER Comment No. 11:** Clarify if the 70,000 and 10,000 external trips (paragraph three) are daily or PM peak hour trips.

**The trips will be clarified as being daily trips.**

**County RER Comment No. 12:** Page 4, last paragraph, clarify locations in bullet point three and four, and for any other corresponding reference to these locations.

**Roadway names will be reviewed and further clarification will be provided for the referenced bullets.**

**County RER Comment No. 13:** Clarify the difference between the concurrency, CDMP, and zoning analyses performed.

**Please refer to response to DTPW Comment No. 2.**

## **CHAPTER I GENERAL INFORMATION**

### **Page 16, Figure I-1 Project Location and Existing Roadways**

**County RER Comment No. 14:** Show and label all major section line roadways, with the number of lanes, for the entire Study Area.

**Please refer to earlier responses on this subject.**

**County RER Comment No. 15:** Add the following missing interchanges on SR 826: NW 67 Avenue, NW 57 Avenue, and heading further east until the Golden Glades interchange.

**The interchanges will be added to Figure I-1.**

**County RER Comment No. 16:** Correct mislabeled “I-75” icon depicted on SR 924/Gratigny Parkway, and on all other applicable maps.

**Correction will be made as noted.**

### **Page 17, Figure 1-2 Preliminary Access Plan**

**County RER Comment No. 17:** Site Plan does not show location of applicant’s proposed park and ride facility for Miami-Dade Transit (MDT), please revise Site Plan to depict location of Park and Ride facility.

**Figure I-2 does include the proposed park and ride facility but is shown in small print. To more clearly highlight the facility, an additional label will be added to the figure.**

### **Page 19, Section 5 Study Area**

**County RER Comment No. 18:** Provide a complete listing of the roadway links depicted in Figures I-3 through I-5.

**A listing will be included in the updated report, as requested.**

**County RER Comment No. 19:** For Figure I-3, I-4 and I-5 label all major section line roadways and other roadway facilities that are impacted 5% or more by the projects to define the study area.

**Please refer to earlier responses on this subject.**

**County RER Comment No. 20:** The 5% analysis to determine the study area boundaries for the existing, future 2020 and 2040 should include all the major section line roadways within the study area.

**Figures I-3, I-4, and I-5 serves to illustrate where the 5% significance test has been met. Also refer to response to RER Comment No. 19.**



**Page 23, Figure 1-6 FDOT and County Count Station Map**

**County RER Comment No. 21:** Label the corresponding roadways for the traffic count stations depicted.

All figures will be updated to include more detailed roadway information, as mention in response to other County comments. With the wealth of information shown on the traffic count station map, we will do our best to fit roadway names in as best as we can with the ultimate goal of having all roadway segments being analyzed having at least one roadway name referenced (e.g. local name, state roadway number, etc.).

**County RER Comment No. 22:** List all the traffic counts stations, not just ones impacted by the 5% of the projects' trips.

We have included ALL traffic count locations which have been referenced in the analyses. As such, traffic count stations are listed beyond the 5% significant study area roadway link locations.

**Page 24, Section 6.2 Existing Roadway Link Directional and Section 6.3 Existing Roadway Link Directional LOS**

**County RER Comment No. 23:** List which peak season count factors were used.

In the June 22, 2016 report, the 2014 peak season factors were applied to all traffic counts (e.g. 2014 and 2015 counts) since this was the latest information available at the time of these tables being prepared. For the updated report, there will be synopsis reports outside of the 2014 time frame (both earlier and later). We will have access to 2014 and 2015 peak season factors which will be applied based on the closest year the counts were taken. The report text will be updated to reflect the methodology applied for using peak season factors.

**County RER Comment No. 24:** Correct reference to FDOT's Generalized Table to Appendix I-E (not I-C).

Correction will be made.

**County RER Comment No. 25:** Please consider using FDOT's synopsis reports to obtain the actual peak hour, peak direction volumes, when available.

Synopsis reports have been requested for all traffic counts which did not have synopsis reports on FDOT Traffic Online website. The counts and PHPs will be updated based on the more detailed traffic counts.

**County RER Comment No. 26:** Utilize the County's 3-day traffic counts.

The County's three day traffic counts will be averaged and used to update PHPs for all MDC count station locations.

**County RER Comment No. 27:** Provide detailed explanation on how the directional peak hour period (PHP) volumes for the County stations were derived.

Please refer to response to DTPW Comment No. 4.

**Pages 25-27, Table I-1 Year 2015 Area Roadway Segment Existing AM and PM PHP Summary**

**County RER Comment No. 28:** Provide copies and identify source of the 15-minute FDOT/MDC/Broward County counts.

Copies were provided in Appendix I-B. The updated report will include refinements to Appendix I-B to reflect the updated synopsis reports received for this report. One traffic count report copy is provided per count location and matches with the information presented in the various tables that reference count data, including historical, PHP, and existing information.

**County RER Comment No. 29:** Revise the table, corresponding maps and list all the roadway segments according to the identified study area, for example:

- a. NW 107 Avenue needs to be depicted from Okeechobee Road to NW 170 Street;

**The roadway segment will be added as requested.**

- b. SR 826/Palmetto Expressway needs to be depicted from SR 836/Dolphin Expressway to NW 27 Avenue;

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

- c. Extend the analysis for the HEFT to the Mainline Turnpike;

**The analyses already include referenced HEFT segments extending all the way to Mainline Turnpike. No changes are necessary since already included.**

- d. Interstate I-75 ends at the Palmetto Expressway/SR 826, delete the roadway segment from NW 57 Avenue to LeJune as it is part of SR 924/Gratigny Parkway;

**The requested roadway segment will be deleted from the analyzed tables.**

- e. Miami Gardens Drive needs to be extended to NW 27 Avenue;

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

- f. NW 138 Street ends at Okeechobee and does not continue to the HEFT;

**The segment on NW 138th St between NW 138th St and HEFT will be removed from the existing, all 2020, and the 2040 Zoning tables. For the 2040 CDMR analyses, SR 924 will be extended to connect with HEFT per LRTP Priority II, Project No. 30.**

- g. NW 87 Avenue needs to be extended from NW 154 Street to Okeechobee Road.

**The analyzed roadway segments for this corridor for the June 22, 2016 submittal extend to at least one link beyond the 5% significance test. A preliminary review of the revised project distribution indicates that the addition of the requested roadway segment may be warranted. We will update the tables accordingly.**

- h. NW 122 Street needs to be extended to LeJune Road;

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

- i. SR 826/Palmetto Expressway needs to be extended south to SR 836/Dolphin Expressway.

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

**Pages 28-29, Table I-2 Existing (Year 2015) Study Area Roadway Segment LOS Analysis**

**County RER Comment No. 30:** Identify the FDOT and County traffic count stations for the roadway segments.

**Count Station IDs will be added to ALL roadway link tables.**

**County RER Comment No. 31:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.

**Please refer to response to DTPW Comment No. 5.**

**County RER Comment No. 32:** Adopted LOS values need to follow the Level of Service Standards in the Transportation Element of the CDMP.

**The Transportation Element will be reviewed to ensure that all LOS standards follow the County's adopted criteria.**

**Page 38, Table I-9 Trip Generation Summary for American Dream Miami**

**County RER Comment No. 33:** Document the calculation used to arrive at the 6,481 Daily trips and 491 PM Peak Hour Trips based on the 10.8% LRT adjustment. RER concurs with FDOT Comment No. 15 which also questions this.

**Please refer to response to FDOT Comment No. 15.**

**County RER Comment No. 34:** Clarify the vehicle occupancy value used to calculate the LRT adjustment.

**Please refer to response to FDOT Comment No. 15 which also addresses the vehicle occupancy rates.**

**County RER Comment No. 35:** The AM/PM internal capture, although it is 0, is labeled incorrectly for each of these corresponding tables.

**Not clear what the reviewer is referring to. Will add a note behind the 0.0% to indicate that it is "of the total trip generation" similar to the LRT adjustment and the diverted trips which have note that it is "of the net external trips."**

**Page 41, Table 1-11 Future Year 2020 Roadway Improvements**

**County RER Comment No. 36:** Remove NW 97 Avenue from NW 154 Street to NW 170 Street from the Year 2020 Committed Improvements list as that roadway already exists.

**Project will be removed from Table I-11.**

**Page 41, Table 1-12 Future Year 2040 Roadway Improvements**

**County RER Comment No. 37:** Clarify that NW 107 Avenue from NW 138 Street to NW 170 Street and NW 102 Avenue from NW 170 Street to NW 178 Street are not part of the Cost Feasible Plan.

**The two projects will be listed separate from the Cost Feasible Plan projects so as to clearly distinguish that they are not 2040 LRTP CF projects.**

**County RER Comment No. 38:** Remove the following from list and corresponding analysis:

- a. Okeechobee Road from NW 154 Street to HEFT, as the Priority IV project is for grade-intersections from Krome Avenue to SR 826/Palmetto Expressway. RER concurs with FDOT's Comment No. 18 that the SERPM model is a tool and should not be utilized as a source.

**Okeechobee Rd will be removed from Table I-12 and will no longer be shown as a Cost Feasible project. Acknowledge request to remove three projects indicated as SERPM model source.**

- b. NW 138 Street to SR 924 (a state road only east of I-75), and correct listing of the project as the boundaries are from the HEFT to SR 826.

**NW 138th St improvements will be updated to show Florida's Turnpike to SR 826 (e.g. HEFT to SR 826). In that respect, for 2040 the roadway link LOS segments description will be changed to show from Florida's Turnpike to SR 826; whereas the existing, all 2020, and the 2040 Zoning roadway link segments will remain from US 27/Okeechobee Rd to Hialeah Gardens Blvd as previously analyzed. Furthermore, the existing NW 138th St roadway link segment from Florida's Turnpike to US 27/Okeechobee Rd will be removed from the link tables per RER Comment No. 29-f.**

- c. HEFT – correct reference from SW 8 Street to SR 836, as that will be widened to 10 lanes, not “10+4” lanes.

**A review of existing Google maps shows the referenced segment as existing 10 lanes. To comply with the above request, the existing and year 2020 number of lanes will be assumed as 8 lanes with widening to 10 lanes by 2040 (CDMP analyses only as it is a Cost Feasible Plan project outside of the TIP).**

- d. SR 826/Palmetto Expressway – reference should be corrected to I-75, from NW 170 Street to SR 826.

**Table I-11 (Year 2020 Committed Improvements) will be updated to separate TIP Project 732687 into the following:**

- **I-75 from NW 170th St to SR 826**
- **SR 826 from I-75 to Flagler St**

- e. SR 826/Palmetto Expressway – correct the future number of lanes and corresponding analysis from “10+4” to 10 lanes (will be widened from 8 to 10 lanes).
- f. Correct other two references to “12+4” lanes on SR 826, as West Flagler Street to I-75 and I-75 north to Dade/Broward County line will be widened with express lanes to a total of 8 to 10 lanes; SR 826 from I-75 to NW 103 Street will be widened with express lanes to a total of 8 to 10 lanes; and SR 826 from NW 103 Street to Flagler street will be widened with express lanes to a total of 10 to 12 lanes.

**Responses for e) and f): We have reviewed FDOT's website <http://palmettoexpresslanes.com/> to clarify the number of lanes being implemented for SR 826. Based on FDOT's information, we will reanalyze SR 826 by 2020 as:**

- **I-75 to NW 103rd St - 6 general use lanes plus 4 express lanes (total 10 lanes)**
- **NW 103rd St to NW 36th St - 8 general use lanes plus 4 express lanes (total 12 lanes)**
- **NW 36th St to Flagler St - 10 general use lanes plus 2 express lanes (total 12 lanes)**

**TIP Project No. 4326871 is scheduled to be completed by 2017. Furthermore, based on the County's comment above, the existing SR 826 laneage will be analyzed as 8 lanes or 10 lanes depending on the segment reviewed. SR 826 north of I-75 is not analyzed in the report tables but since it is part of Project No. 4326871 will be included in the improvement table as 6 general use lanes plus 2 express lanes (total 8 lanes) per the FDOT website.**

- g. RER concurs with FDOT Comment No. 33 regarding the listing of the “10+4” and “12+4” lanes listed for the 2040 CDMP analyses.

**Please refer to response to FDOT Comment No. 33 which addresses the differences between the 2040 CDMP and the 2040 Zoning analyses and why there were differences in the number of lanes between the two Scenarios, as per the roadway improvement lists reflected in the June 22, 2016 report.**

#### **Page 45 Section 8.3 Background Growth**

**County RER Comment No. 39:** RER concurs with FDOT's Comment No. 20 questioning the rationale for the cap placed on growth rate. Florida's Turnpike Authority has indicated that their facilities sustained considerable growth rates, and due to this they request that independent growth rates be used for their facilities, separate from the rates used for other limited access facilities.

**Please refer to FDOT Comment No. 20.**

**County RER Comment No. 40:** RER Staff emailed on January 28, 2016 a map, table and corresponding traffic reports for approved plats within the vicinity of the ADM and Graham projects. As there is no reference to usage of said information, please revise for inclusion as background growth.

Acknowledged. The vested trips were included in the model assignments but were not considered in the Concurrency analyses. The updated report will include a separate column for the provided approved platted trips so that they can be included in the total DOS plus platted vested trips. The future year growth rates for the Zoning and the CDMP analyses will be checked against the vested trips to ensure that at a minimum the growth rates account for both sets of vested trips.

**Pages 46-47, Table 1-13 Year 2020 and Year 2040 Roadway Background Future Growth Rate Summary**

**County RER Comment No. 41:** Revise to provide analysis on the PM peak hour average of the County's traffic counts for the three-day period which provide a more comprehensive average, rather than the first day of the successive three-day count.

**See response to earlier RER Comment on this subject (e.g. RER Comment No. 26).**

**County RER Comment No. 42:** For the background analysis for both ADM and Graham, revise to omit the background traffic of the other application.

**Please see lengthy reply to FDOT Comment No. 31 which refers to the same request.**

**Page 49, Section 8.5 Background Roadway Link Directional LOS**

**County RER Comment No. 43:** Please provide information as to how the service volume values were converted into directional LOS values

**Please refer to response to DTPW Comment No. 5.**

**Page 50, Table I-15 Year 2020 and Year 2040 Roadway Segment Future Background AM and PM PHP Summary**

**County RER Comment No. 44:** Revise to provide a separate column for FDOT and County vested development orders (DOS) trips, instead of including them as part of the overall background.

**The FDOT and County vested trips will be separated, as requested.**

**Page 66, Section 10 Project Assignment**

**County RER Comment No. 45:** RER concurs with FDOT's Comment No. 28 questioning the 0.0% trip assignment to/from the Graham project within the roadway link of NW 170 Street from NW 102 Avenue/NW 107 Avenue to NW 97 Avenue.

**Please refer to response to FDOT Comment No. 28.**

**County RER Comment No. 46:** RER concurs with FDOT's Comment No. 29 questioning why no trips were assigned for the roadway link of NW 170 Street from NW 82 Avenue to NW 78 Avenue.

**Please refer to response to FDOT Comment No. 29.**

**Page 66, Section 9 Project Trip Distribution**

**County RER Comment No. 47:** RER concurs with FDOT's Comment No. 23 regarding clarification of the socio-economic data and requesting inclusion of the model volume plots.

**Please refer to response to FDOT Comment No. 23.**

**CHAPTER II ADM FUTURE TRAFFIC IMPACTS**

**County RER Comment No. 48:** RER concurs with FDOT's extensive Comment No. 31 that backlogged facilities should only include traffic from approved development—it should not include traffic generated by either the ADM/Graham projects.



**Again, please refer to lengthy response to FDOT Comment No. 31.**

**Page 72, Section 1.0 Year 2020 PM Concurrency Analysis**

**County RER Comment No. 49:** Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15.

**Table I-13 is simply shown for the purposes of deriving future percentage growth based on historical daily counts. Table I-15 then takes the derived growth rates and applies them to existing 2015 PHPs to obtain future year 2020 CDM/ Zoning, year 2040 CDM, and year 2040 Zoning peak hour peak direction forecasts. Table I-15 also compares the forecasted growth projected future volumes to the vested trips included with the Concurrency forecasts. A verification was made to ensure that at a minimum the growth-derived volumes exceeded the vested trip forecasts. As such, the vested trips, which are in terms of peak hour two-way trips, was not applicable to the growth forecast information presented in Table I-13.**

**Page 73, Table II-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-ADM PM Impacts**

**County RER Comment No. 50:** Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment.

**Please refer to earlier response to similar request (RER Comment No. 30).**

**County RER Comment No. 51:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.

**Please refer to response to DTPW Comment No. 5.**

**County RER Comment No. 52:** The values in the “Adopted LOS” column need to be consistent with the adopted CDM Level of Service Standards in the Transportation Element.

**Please refer to response to RER Comment No. 32.**

**Page 91, Section 6 Impact Fee Assessment**

**County RER Comment No. 53:** The response to Question 10 of the DRI analysis indicates that road impact fees are expected to be paid in the amount of \$110 million. Appendix II-A ADM Preliminary Impact Fee Analysis lists an impact fee of \$58,752,501 for ADM and an impact fee of \$7,439,278 for Graham for a total of \$66,191,779. Revise to resolve differences between the two figures.

**The applicant will review the two earlier submittals and differences between the two will be resolved. The updated CDM TIA report appendices on traffic impact fees will be refined, as applicable.**

**Page 101, Section 1.0 Year 2020 PM Concurrency Analysis**

**County RER Comment No. 54:** Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15

**Please refer to RER Comment No. 49.**

**Page 102, Table III-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-Graham PM Impacts**

**County RER Comment No. 55:** Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment

**Please refer to earlier response to similar request (RER Comment No. 30).**

**County RER Comment No. 56:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.

**Please refer to response to DTPW Comment No. 5.**

**County RER Comment No. 57:** The values in the “Adopted LOS” column need to be consistent with the adopted CDMPL Level of Service Standards in the Transportation Element.

**Please refer to response to RER Comment No. 32.**

**CHAPTER IV COMBINED FUTURE TRAFFIC IMPACTS**

**County RER Comment No. 58:** Relabel Tables VI-2B, VI-3A, VI-5A, VI-5B, VI-6A, VI-6B to IV-2B, IV-3A, IV-5A, IV-5B, IV-6A, and IV-6B to be consistent with the rest of the tables in Chapter IV and listed in the table of contents.

**Will update as noted.**

**Page 131, Table IV-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis – Combined ADM/Graham PM Impacts**

**County RER Comment No. 59:** Please clarify how the information provided in this table differ from the information provided in Chapters II and III, Tables II-1 and III-1 Concurrency Short Term (Year 2020).

**The information shown in the three Scenarios and their Concurrency tables are essentially the same. All three tables have the same number of concurrency "pure" background trips (e.g. include vested trips as opposed to growth-derived trips) and the same number of total overall trips. The only differences between the tables were whether or not each Scenario considered the other Site's Project trip as additional background trips (e.g. Chapters II and III) or included the trips as "Project Trips" in the case of the Combined Scenario. The updated approach for the revised report will no longer include the other Project trips as background trips, as discussed in response to various comments from review agencies.**

**Pages 149 and 157, Section 9.0 Mitigation Summary**

**County RER Comment No. 60:** Correct references in the first and second paragraph to the ADM project mentioned twice and include reference to the Graham project.

**Correction will be made.**

**County RER Comment No. 61:** First paragraph, Applicant states they are working with various agencies on a “study area roadway improvement plan to include.... with development timelines.” Clarify which agencies they are working with, what formalized agreements have been entered, and provide development timelines.

**Information will be included in the updated report, as requested.**

**County RER Comment No. 62:** The applicant states the previously mentioned roadway improvement plan will “accelerate several cost feasible” priorities from the County’s Adopted 2040 Long Range Transportation Plan (LRTP) into an “earlier timeline.” However, Project No. 2 (the new interchange at HEFT and NW 170 Street) is not part of the Cost Feasible Plan, but is instead listed as a private improvement. Revise to include the appropriate reference to the non-cost feasible plan and to clarify which LRTP Priority the improvements fall under, or if they are not included in the 2040 LRTP.

**Clarification will be provided, as requested.**

**County RER Comment No. 63:** All the list of improvements with the exception of the NW 102 Avenue and NW 107 Avenue projects, were assumed to be in place by 2020. Please refer to previous comment and advise feasibility and method by which applicant proposes to advance and pay for the LRTP priorities. As noted, one project is not part of the 2040 LRTP Cost Feasible Plan, and the project on NW 170 Street from the HEFT to NW 97 Avenue is a Priority III (2026-2030).

**Clarification will be provided, as requested.**

**County RER Comment No. 64:** Page 98 in Chapter II of the ADM Mitigation Summary Section, projects 4 and 5 in the numbered 1 through 9 list of improvements refer to the “ADM Project Access Road”, while on Page 127, Chapter III in the Graham Mitigation Summary Section, lists as project 13 and 14 the “Graham Project Access Road.” Page 149 in Chapter IV of the Combined Future Traffic Impacts lists the previously mentioned projects 4, 5, 13, and 14 as the “Graham Project Access Road” with the improvements numbered 1 through 9. Please resolve those differences.

**Differences will be resolved in the updated report.**

**County RER Comment No. 65:** Please clarify the two additional project improvements listed under “Year 2040”. Also, the improvements do not show the backlogged facilities also needing roadway improvements in order to meet acceptable LOS operating conditions.

**As indicated in other responses, the Executive Summary along with the individual Chapter Mitigation Summaries, will be updated to include not only Project-related mitigation results but also backlogged needs and roadway improvement assumed to be in place for each Scenario.**

**County RER Comment No. 66:** Re-evaluate reference to backlogged facilities, in reference to RER previous comments under “Chapter II ADM Future Traffic Impacts.”

**Please refer to RER Comment No. 48.**

**County RER Comment No. 67:** The last sentence on Page 157 states that “alternative travel modes” will be “addressed separate of this Report.” As the application is currently undergoing review, that analysis needs to be provided now.

**Understood. The updated report will provide information pertaining to alternative travel modes and will specifically address the availability of shuttle buses to and from the Sites for nearby hotels, airports, etc.**

## **CITY OF MIRAMAR, DATED SEPTEMBER 12, 2016:**

City of Miramar staff has reviewed the applicant's responses to the Cities comments submitted on February 2, 2016. New staff comments are shown in italics below.

**Miramar Comment No. 1:** Direct transit service should be provided from the American Dream Miami Mall and Graham industrial/retail development to the park and ride lot at Miramar Regional park and the Miramar Town Center Park and Ride.

*The applicant stated that detailed transit routes will be discussed at a later date. Transit routes and connections into Miramar need to be discussed during the review of the CDMP application to identify options to relieve roadway congestion. Discussing this issue during the CDMP process will also help county and city officials plan for additional multi-modal options to serve employees and visitors.*

**Further detail regarding transit opportunities will be addressed in the updated report including planned shuttle services operated by ADM.**

**Miramar Comment No. 2:** At a minimum, the analysis should evaluate traffic impacts to Miramar Parkway, Pembroke Road, Red Road/NW 57th Avenue and Flamingo Road/NW 67th Avenue. A level of service analysis at project buildout should be provided for all of these roadways.

*The applicant referred to their response to Broward County Comment No. 11. Broward County Comment No. 11 only refers to Flamingo Road. There are several other roads listed in our comment. The applicant did not respond to impacts on these roads.*

**The applicant's intent was to state that the comment which was included for Flamingo Road applied to all other roadways listed. With the understanding that the City continues to see a relevance for these facilities to be included in the analyses, we have taken another look at the project percent distributions for the ADM and the Graham Sites relative to the respective roadway corridors. In the spirit of accommodating the City's concerns we will add NW 57th Ave and NW 67th Ave corridors to the analyses, though there is less than 1 percent of project traffic assigned to the roadway segments north and south of Miami Gardens Rd where the traffic is the heaviest. NW 57th Ave north and south of the HEFT interchange we will also review any impacts since this facility has near 3 percent project contribution. Miramar Pkwy was already included in the June 22, 2016 analyses. For Miramar, it included up to 4 percent significance with a six lane capacity. Since fewer trips will be associated with the Pembroke facility which is also a six lane facility, we do not see the need to analyze this facility.**

**Miramar Comment No. 3:** The Miramar Parkway buildout year volumes shown in Tables 9 and 10 of the Transportation Impact Analysis are lower than projections prepared by the Broward Metropolitan Planning Organization. The developer's traffic consultant should meet with the City of Miramar, Broward County, and Broward Metropolitan Planning Organization to discuss the impacts to City roadways and potential mitigation. The City is in the process of updating its Capital Improvement Program to include the extension of Miramar Parkway from its current terminus at SW 192 Terrace to Pembroke Road at SW 196 Avenue . The extension of Miramar Parkway to Pembroke Road will help alleviate the current traffic problem at Miramar Parkway/1-75 Interchange, improve the Level of Service at this intersection and provide an alternate north-south route via US 27.

*The applicant states that this improvement is included in the Year 2020 Cost Feasible Plan. The extension of Miramar Parkway to US 27 is currently included in the 2040 Long Range Transportation Plan for funding between 2031 and 2040. This improvement should be expedited and constructed prior to the American Dream Miami Mall and Graham industrial/retail developments.*

**The applicant will review the Broward adopted LRTP and most recent TIP and depending on the funding commitment will add this as an improvement to Table I-11 (Year 2020 Committed Improvements) or Table I-12 (Year 2040 Cost Feasible Plan Improvements). We can only assume the project is funded by the year 2020 if it is actually included in the Broward Transportation Improvement Plan, even if efforts are ongoing to expedite the project to be completed earlier. We have to proceed with the information which is available at this time.**

## **TOWN OF MIAMI LAKES, DATED SEPTEMBER 13, 2016:**

**Miami Lakes Comment No.1:** Though according to the traffic consultant, the trips from each of the two projects combined for the determination of significant trips on each link is included in the traffic study, at the very least this is not reflected on the maps (I-10A, I-10B, I-11A, I-11B, I-12A and I-12B). To be clear, determination of the 5 percent significance threshold should be included as if the two applications were one project and NOT with one project included as “background” traffic of the other.

**The traffic analyses have been prepared so that each Project's trips are shown separate from the other Project's trips even when the trips are added together to achieve total overall trips. This allows the reviewer to be able to see**

that the individual project trips do not vary regardless of which Scenario is being reviewed. We do not see the need to add a combined Project distribution as the Projects will not be assessed as a Combined Project for mitigation purposes. In other words, a Combined percentage would not be the premise to identify whether the 5 percent threshold has been met. Chapter IV will be maintained in the updated report for informational purposes only.

**Miami Lakes Comment No. 2:** Please re-examine the trip distribution analysis to determine whether NW 67<sup>th</sup> Avenue should be included. The maps appear to show ZERO trips added to NW 67<sup>th</sup> Avenue, which seems unrealistic considering there is not another north-south surface street to traverse all through the area covered by the map for two miles to its west (to NW 87<sup>th</sup> Avenue).

**NW 67th Avenue will be added to the analyses, as requested. There is less than one percent project trips on the segments in the surrounding area but it is clear that this is an important facility to the Town. With the facility having six lanes of capacity north and south of the Miami Gardens Drive the project trips to capacity ratio will be well below the 5 percent significance test.**

**Miami Lakes Comment No. 3:** As expressed before, the required traffic methodology for both Comprehensive Plan amendments and for concurrency determination are inadequate (as proven by existing traffic conditions despite the existence of the concurrency system for decades), and help to create a situation where driving is the only viable option. At the same time, if a road is already failing, then according to the consultant, there is no mitigation requirement to the applicant, regardless of how many additional trips are being added to a failing segment. Given the size and significance of each of these projects, and certainly their significance when considered together, the County should consider a plan for true multi-modal mobility in this area, and charge the applicant for needed multi-modal improvements based on the number of daily trips generated. This would give the County the policy flexibility to provide viable alternatives to automobile travel, rather than undermining walking, transit and bicycling as possibilities in the (hopeless, by all available evidence) pursuit of free flowing traffic.

**Comment acknowledged. The County has prepared a proposal for the transit impacts associated with the two Sites. The Transit Impact Report information will be reviewed and addressed as part of Miami-Dade County's request to elaborate further on transit proposed for the Sites as part of the updated report.**

**Miami Lakes Comment No. 4:** Much of the discussion at Friday's meeting centered around the possibility of bringing new transit infrastructure directly into the development(s). Are plans/designs for any road or other right-of-way improvements (i.e. 170<sup>th</sup> Street, 186<sup>th</sup> Street, etc.) being developed in a way that will accommodate this possibility?

**Just to clarify, there was no stated commitment regarding adding transit "infrastructure" in the form of light rail transit or similar exclusive transit corridor operations to the two Sites at this time. There was discussions about the potential for future consideration of transit infrastructure similar to what is in place at Mall of America where LRT has been in place for some time. Since there are no planned or programmed alignments to work from at this time, further details or considerations of right-of-ways are premature at this stage.**



**AMERICAN DREAM MIAMI & GRAHAM PROJECT**  
**Comprehensive Development Master Plan (CDMP) Amendment**  
**Transportation Impact Analysis (TIA) and Supporting Traffic Studies**  
**Submitted June 22, 2016**

**RECEIVED**

**COMMENT SET & RESPONSES**

**Dated October 7, 2016**

**With Final Revisions/Notes Added in Red**

**2016 OCT 12 A 10:26**

**RER-PLANNING DIVISION**

**Introduction to CDMP TIA Comment Responses**

Attached are the responses to comments received from eight (8) reviewing agencies and interested parties on the CDMP TIA and Supporting Studies dated June 22, 2016, with FDOT Districts 4 and 6 submitting a joint set of comments. In summary, comments were received and responded to from Miami-Dade County Transit, Miami-Dade County Department of Transportation and Public Works (DTPW), Miami-Dade County Department of Regulatory and Economic Resources (RER), Florida Districts 4 and 6, the Florida's Turnpike District, Broward County, Town of Miami Lakes, and City of Miramar.

The applicant has made every effort to address the agencies comments and is fully committed to working with all applicable parties to obtain final consensus on the CDMP TIA and the various supporting studies. Furthermore, the applicant is proceeding forward towards finalizing an updated version of the June 22, 2016 report that incorporates all responses addressed in this Comment Set and Responses. The intent is to resubmit the report within a reasonable time and allow the agencies to review the updated report and ensure that it has adequately accommodated all requests.

One issue which should be further elaborated on is the approach for analyzing background trips. The June 22, 2016 included the assumption that each Project was analyzed individually while considering the other Project's trips as part of the background trips and that this served as the basis for the mitigation recommendations. The request to include Graham project trips for the ADM analysis was first introduced in the Comment and Response Set dated October 16, 2015, as part of comments received from respectively FDOT, Southeast Florida Regional Planning Council, and the City of Hialeah (refer to Appendix I-A-3). Graham trips were included in the analysis presented in the December 22, 2015 CDMP TIA, following addendum to add the Graham Project to the methodology originally derived for the ADM site. As late as May of 2016, a summary of the different analysis scenarios were shared with Miami-Dade County, in part to demonstrate the extensive number of intersection and roadway segment analyses which were being prepared for the sites and to share the length of time required to complete these analyses (due in great extend to the approach of having the other Project in the background traffic and now having three separate Chapters for the ADM, the Graham, and the Combined scenarios). We stand by the analyses which was presented in the report with the statement that this was our understanding of the approach that was intended for the analyses. The applicant is amenable to work with agencies to resolve any issues of concern related to the presented approach and in an effort to make sure that all parties are comfortable with the findings is prepared to reevaluate the analyses without the other Project being included as background trips. Responses to comments on the background trip approach reflect our commitment.

**Since the submittal of the "Comment Set & Responses" dated September 20, 2016, some minor revisions were made to the responses as part of incorporating the comments into the Updated CDMP TIA report. All edited text is indicated in red.**

## FDOT DISTRICTS FOUR AND SIX, DATED AUGUST 05, 2016:

### General Comments

**FDOT No. 1:** Since ADM and Graham Property traffic analyses assume interchange improvements that affect an existing or future interchange, an Interchange Access Request (IAR) document, consistent with the *FDOT Interchange Access Request – User's Guide* will be required for each of the interchange modifications. The noted improvements affect an existing, future full interchange, or future partial interchange (Miami Gardens Drive at I-75, HEFT at I-75, a new interchange at HEFT and NW 170th Street, and a partial interchange at NW 178th Street and I-75). Additional traffic analyses beyond that submitted for the CDMP will be required to evaluate impacts upon SIS facilities and interchanges during morning, afternoon, and weekend periods, and identify improvements to accommodate the additional future traffic.

**The applicant will work with FDOT to ensure that all applicable traffic study documents are prepared as needed. The HEFT and NW 170<sup>th</sup> TIJR is already in progress and coordination is being made with the Florida's Turnpike.**

**FDOT No. 2:** Several transportation improvements projects are relied upon to demonstrate adequate public facilities are present by 2020 to accommodate the expected travel demand generated by ADM and Graham Project. These include an interchange modification at HEFT and I-75; a new interchange at HEFT and NW 170th Street; a partial new interchange at I-75 and NW 178th Street; and an interchange modification at I-75 and Miami Gardens Drive. Each of these interchange improvements ultimately requires FDOT and FHWA approval. Please note that current FHWA policy discourages partial interchange configurations and access serving private property. Although FHWA Policy Point #4 stipulates that each case is evaluated on its own merits, it is the Department's experience that obtaining approval for partial interchanges is a difficult and long process that may present scheduling challenges.

**The applicant acknowledges FDOT comment and will continue to work with the Department to ensure that these improvements are in place by the year 2020.**

**FDOT No. 2 Cont'd:** If any of the interchange improvements fail to be approved and/or constructed by 2020, the base transportation network that is the foundation of ADM and Graham Project's traffic analysis is invalid. This would result in additional transportation impacts to area roadways that were not analyzed. Therefore, it is recommended that a condition of approval be included for the ADM and Graham Project COMP submittals contingent upon obtaining the requisite FDOT and FHWA approvals for the proposed interchange access changes. If any of the relied upon transportation improvements are not approved, a re-evaluation of the traffic impact analysis will be necessary.

**The applicant acknowledges the above statements and understands that the submitted CDMP TIA has been based on the presented projects being in place. In the event that a proposed transportation improvement is not in place as planned, additional analyses may be required to address mitigation including but not limited to development phasing, scale of development or alternative transportation mitigation.**

**FDOT No. 3:** Please provide the electronic Synchro files so that they may be reviewed.

**The electronic Synchro files will be included once the updated CDMP TIA and Supporting Traffic Studies report is resubmitted accommodating the responses to agency comments, per the introductory overview.**

**FDOT No. 5:** Please add delay and v/C ratio values to all intersection LOS summary tables for ease of comparison between the various analyses conducted and for verification with the Synchro analysis. Such information is beneficial for understanding the intersection mitigation improvements if the approach and movement specific delay and LOS were provided in tabular format.

**Delay will be added to all intersection LOS summary tables, as requested. Specifically Tables I-16, II-4, II-7, III-4, III-7, IV-4, and IV-7 will be updated to include the final delay along with the overall intersection LOS results. Overall intersection volume to capacity ratios are not produced in the updated intersection results (e.g.**

**HCM 2010, as requested). Information on approach volume to capacity ratios will be maintained within the Appendices showing the individual intersection analysis outputs.**

**FDOT No. 5:** Page 99, 128, & 157, Mitigation Summary, Intersection Improvements: Why were intersection improvements limited to only three variations (1 exclusive right turn lane, 3 through lanes, and 2 left turn lanes)? Each intersection depending on location and geometry should have been assessed separately. Unique lane geometries should be tested to determine what is necessary for the intersection to function at an acceptable LOS.

**The mitigation limits were set to ensure that reasonable assumptions were made in regards to the potential future layout of intersections. At this point in time, there are many uncertainties in regards to what nearby land use and associated access points could exist by the time the Projects are being implemented (e.g. 2020 and 2040). Mentioned "unique" lane configurations, such as two right turn lanes or three left turn lanes, are complicated by the need to have receiving lanes to accommodate such geometries and in turn depend on numerous other supporting factors such as potentially having to merge the traffic back to its original number of receiving lanes. The most conservative and realistic approach is to set the intersection configurations to the identified maximum mitigations (e.g. 1 exclusive right turn lane, 3 through lanes, and 2 left turn lanes).**

**FDOT No. 6:** Please check the page numbering of the report documents. There seems to be some skipped numbers.

**The first page of several of the tables were accidentally left out when compiling the submitted June 22, 2016 CDMP TIA and Supporting Traffic Studies report. The missing pages that will be added back into the updated report are:**

Page No.	Item
53	1st pg of Table I-16, Year 2020 and 2040 Background Intersection LOS Analysis
64	1st pg of Table I-17, Year 2020 SE Data on Year 2020 Roadway Network Project % Distribution & PM Trips
82	1st pg of Table II-3B, Zoning Short Term (Year 2020) Study Area Roadway Segment LOS Analysis - ADM PM Impacts
87	1st pg of Table II-5A, CDMP Short Term (Year 2040) Study Area Roadway Segment LOS Analysis - ADM AM Impacts
94	1st pg of Table II-6B, Zoning Long Term (Year 2040) Study Area Roadway Segment LOS Analysis - ADM PM Impacts
111	1st pg of Table III-3B, Zoning Short Term (Year 2020) Study Area Roadway Segment LOS Analysis - Graham PM Impacts
121	1st pg of Table II-6A, Zoning Long Term (Year 2040) Study Area Roadway Segment LOS Analysis - Graham AM Impacts

**Referenced page numbers are with respect to the June 22, 2016 CDMP TIA and Supporting Traffic Studies report.**

### **Executive Summary**

**FDOT No. 7:** There are 9 improvements, including interchange improvements at I-75/HEFT/Miami Gardens Drive, a new interchange at HEFT and NW 170th Street, and I-75 ramps at NW 178th Street to/from southbound I-75, that are assumed to be constructed by 2020. These improvements form the basis of the 2020 roadway network used for the submitted concurrency analysis, zoning analysis, and comprehensive development master plan analysis. It is suggested that these improvements be identified in the Executive Summary, and specified as roadway improvements necessary to accommodate both developments' traffic. This comment also extends to the Mitigation Summary section for Chapters 2 and 3.

**The addition of the above mentioned improvements will be added to the Executive Summary and are part of the Mitigation Summaries (please also refer to response to FDOT Comment No. 41).**



## **Chapter 1, Section 6 - Existing Conditions**

**FDOT No. 8:** In some instances, FDOT daily traffic volumes were adjusted using K and D factors to estimate peak hour, peak directional volumes for roadways. Please consider using synopsis reports for those count stations to obtain an actual peak hour, peak directional volume for the existing conditions. Such synopsis reports can be provided by FDOT upon request.

**Synopsis reports have been requested from FDOT and will be incorporated into the updated analyses.**

**FDOT No. 9:** In Appendix I-D, please include the name of the intersection in the header of all Synchro output worksheets. Also, please identify the type of analysis (HCM 2010 or Synchro 9) and results represented on each worksheet. This applies to all Synchro output worksheets provided for each scenario in each chapter of this submittal package.

**The intersection name will be included in the header for all Synchro output worksheets. As indicated in response to FDOT Comment No. 11, the outputs will be updated to represent HCM2010 results.**

**FDOT No. 10:** Page 25, Table I-1: For Segment NW 107th Avenue from NW 122nd Street to NW 138th Street, please place Note number (4) under the appropriate column. Also, it is understood that no data was available for this segment, however please explain why the assumption of an AADT of 8,000 was used. How was this value determined?

**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.**

**FDOT No. 11:** Page 31, 1st Paragraph: It is stated that Synchro's HCM 2010 methodology will be used for the output results; however the results provided throughout the document and the Synchro outputs in the appendix are not of the HCM methodology. They are instead the calculated delay and LOS from the Synchro system, which does not calculate the results according to HCM. You must choose to print the HCM 2000 or 2010 version outputs within the software. Please provide the HCM output results for all existing conditions and future Synchro analysis.

**Correct, the report did state that the HCM 2010 results were being produced for the Synchro outputs. The report should have stated the Synchro results were produced. In fact for the June 22, 2016 submittal, the decision was made to reference the Synchro results in lieu of the HCM 2010 results due to the more realistic vehicular operations which are referenced in Synchro. For example, Synchro is specifically set-up to evaluate the queuing of vehicles at intersections and also has the option to include the free-flow right on red movements.**

**Since FDOT's comment specifically requests that the HCM results be included instead, the applicant will revise its approach and the newly updated CDMP TIA report will include HCM 2010 results. All intersection analyses and summary tables will be updated accordingly.**

## **Chapter 1, Section 8 - Background Conditions**

**FDOT No. 12:** Identified in Appendix I-D, unusual cycle lengths were used to analyze many of the intersections. For example, at the intersection of Florida's Turnpike ramp termini and Okeechobee Road a 133-second cycle length was analyzed for the south ramp termini intersection. However, the north ramp termini intersection was analyzed with

a 80- second cycle length, even though they were evaluated as an actuated-coordinated system (See page 526 of Appendix I-D). Similarly, at Florida's Turnpike and Red Road, the west ramp termini intersection was studied with a 69.4-second cycle length, and at I-75 and Miramar Parkway, the south ramp termini intersection was analyzed with a 65.4-second cycle length (see pages 532 and 540 of Appendix I-D). It is recommended that all intersection analyses be revised to reflect the cycle lengths and phasings from existing signal timing sheets. Future year analyses should maintain cycle lengths and phasings, although splits may be optimized to reflect different green time needs due to traffic volume changes.

**For consistency, the intersection analyses will be revised to reference the existing timings. This will be included for all future intersection analyses and results will be provided in the updated appendices and corresponding intersection summary and mitigation tables.**

## **Chapter 2, Section 8 – Weekend Review**

**FDOT No. 13:** The text provided for the Weekend Review (page 94 of the PDF) indicates that no further review of weekend conditions is needed based on the findings. However, no specific findings are written in support of this statement. Please provide additional details concerning the weekend evaluation to justify not analyzing weekend conditions further. For example, a comparison of ADM and Graham Property project volumes for a typical weekday and weekend should be provided; a comparison of total traffic volumes for a weekend and weekday should be included; and an assessment of directional volume changes that may impact SIS facilities and nearby interchanges in a manner different from what is experienced currently.

**As indicated in Section 8.0, the weekend analysis is contained in Appendix II-C and includes the referenced comparison of typical p.m. weekday traffic versus Saturday peak hour of generator traffic associated with the ADM site. The analysis includes assignments on Miami Gardens Drive from I-75 Eastern Ramps to NW 87th Ave, on Florida's Turnpike/HEFT/SR 821 from US 27/Okeechobee Road to NW 170th Street, and on I-75 from Florida's Turnpike to Miami Gardens Drive. The analysis addressed all the above mentioned criteria for the weekend analysis and concluded that the weekday p.m. peak hour is the highest total traffic period during the week. It was therefore determined that there was not a need to analyze all roadway segments within the study area for the weekend period and that the traditional weekday period served as the worst case traffic conditions.**

## **Chapter 1, Section 6 – Existing Conditions**

**FDOT No. 14:** In section 6.2, the PHP is defined as the average of the two highest consecutive hours of traffic and defined as the average of traffic volume between 7-9 AM and 4-6 PM. Are these the highest consecutive hours of traffic for all links? The two highest consecutive hours should be determined from traffic counts and defined for SIS facilities, Turnpike facilities, Other State Facilities, and County Facilities separately. This methodology should be consistent with the Interchange Access Request methodology.

**The applicant acknowledges FDOT's comment and the County's procedure for deriving PHP volumes based on the two highest consecutive hours of the day. For the intersection turning movement counts, the field counts were based on the AM hours between 7:00 am and 9:00 am and the PM hours between 4:00 pm and 6:00 pm, the traditional highest hours of the day. As such, the existing intersection TMVs are based on an average of the field observed two-hour period counts. For consistency purposes, it is the applicants' traffic consultant's professional opinion is that it makes the most sense to use the same two-hour peak periods for all intersection and roadway segment counts and is therefore recommending not to revise the approach for the development of PHP volumes.**



## Chapter 1, Section 7 - Trip Generation

**FDOT No. 15:** The Department does not dispute the 10.8% LRT adjustment to net external trips which was previously approved as part of the methodology and shown in Table I-9. However, the calculation of the LRT adjustment should be reviewed. If 10.8% of person trips to MOA took LRT then this 10.8% should be applied to the person trips visiting ADM. Assuming a vehicle occupancy of 2.3 for ADM to match the vehicle occupancy of MOA then 69,822 daily net external vehicle trips translates to 160,591 person trips. To add the 10.8% back divide 160,951 person trips by  $1 - .108 = .892$  so 180,438 person trips to American Dream Mall. Converting back to vehicle trips with a 2.3 auto occupancy gives 78,451 vehicle trips. The difference between 78,451 and 69,822 vehicle trips is 8,629 additional vehicle trips. Please clarify the difference between the 8,629 vehicle trips calculated vs. the 6,481 vehicle trips provided in Table I-9.

**There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the vehicle occupancy, was scrutinized to a great extent and does not warrant further review. Furthermore, we should point out that the calculations in the comment have overlooked the MOA person trips arriving by tour buses, hotel shuttles, local buses, etc which totaled 8% of the person trips. This is included in the vehicle counts. Given their higher vehicle occupancy, not adjusting for that first will yield the wrong conversion to vehicle trips. This was all accounted for in the trip generation negotiations and therefore is part of the agreed to trip generation methodology.**

**FDOT No. 16:** In the Addendum to TIA Methodology for CDMP (Nov. 24, 2015) PM internal capture was 15.1% in 2020 and 10.8% in 2040 for the Graham project, but the current analysis shows 24.48% in 2020 and 18.38% in 2040. Unless otherwise approved, use the same internal capture rates that were previously approved in the methodology.

**The trip generation table presented in the June 22, 2016 TIA varies from the November 24, 2015 information and again was coordinated with review agencies during the early months of 2016. No further refinements are warranted at this time, as all issues related to the trip generation is considered to have been finalized.**

## Chapter 1, Section 8 - Background Conditions

**FDOT No. 17:** Florida's Turnpike [sic I-75] from I-595 to Pines Blvd in Broward County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Broward MPO 2040 LRTP. The identified source in Table I-12 is the SERPM7.0 model. The model is a tool and should not be used as a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.

~~The model travel demand forecasts and all the Year 2040 CDMP roadway LOS tables will be updated to reflect that the Florida's Turnpike from I-595 to Pines Blvd is not widened. Table I-12 will also been updated along with all corresponding roadway link LOS analyses. Please consider this as notification to FDOT that there is an inconsistency between the 2040 Broward LRTP and the SERPM7.0 model.~~ **The comment actually refers to I-75 from I-595 to Pines Blvd (response to comment was addressed for a different roadway segment). As such, the referenced project is actually an improvement included in the Broward Transportation Improvement Plan as a Design Build project and referenced as TIP# 4217076. The project will be added into the updated Table I-11, Year 2020 Committed Improvements.**

**FDOT No. 18:** Okeechobee Road from NW 154th St to Florida's Turnpike in Miami-Dade County is included as a Year 2040 Cost Feasible Plan improvement but this project is not included in the Miami-Dade MPO 2040 LRTP. The identified source in Table I-12 is the SERPM 7.0 model. The model is a tool and should not be used as a source. Please reference the appropriate agency plan as the source for this project. If the model does not properly reflect agency plans, FDOT should be notified and the project should be removed.

The model travel demand forecasts and all the Year 2040 CDMP roadway LOS tables will be updated to reflect that Okeechobee Road from NW 154th St to Florida's Turnpike is not widened. Table I-12 will also be updated along with all corresponding roadway link LOS analyses. Please consider this as notification to FDOT that there is an inconsistency between the 2040 Miami-Dade LRTP and the SERPM7.0 model.

**FDOT No. 19:** SERPM 7.0 model is identified as a source for three projects in Table I-12 but the methodology identified SERPM 6.5/Managed Lanes PD&E model, plus Turnpike edits for their planned future projects, plus the approved SERPM 7 socioeconomic data integrated in. Please clarify which model was used for this analysis.

In fact, the "SERPM6.5/Managed Lanes PD&E Model plus Turnpike Edits Plus the Approved SERPM 7.0 SE Data" serve as the basis for the model runs prepared for the submitted *CDMP TIA and Supporting Traffic Studies*. The only changes which have been made to the model runs were to accommodate: 1) The latest committed and cost feasible LRTP roadway improvements, 2) The planned roadway improvements as presented in the June 22, 2016 report, 3) The ADM and the Graham Projects land use data, and 4) The requested additional platted projects. The network improvements will be identified in revised Tables I-11 and I-12 presented in the updated CDMP TIA report and will include the previously referenced removal of the three SERPM 7.0 model projects (see response to FDOT Comments No. 17 and 18). The platted projects were detailed in Appendix I-L.

**FDOT No. 20:** Section 8.3 indicates that growth rate caps were imposed on all facilities. In the approved methodology no growth rate cap was included. Please clarify in the report how and why the growth rate caps were determined, and provide any numerical support of this determination.

Correct, the methodology did not address setting a cap for the project traffic growth rates. When reviewing historical growth rates, though, there were links with both negative and extremely high growth rates. For example, Hialeah Gardens Blvd has had an average growth of 19.3 percent per year over the period 2009 through 2014. If 19.3 percent growth is maintained through the year 2040, this would equate to the traffic growing by 100 times its existing value which obviously would not be realistic. It was therefore decided to err on the conservative side and set lower growth rate percent maximum values; keeping in mind that higher growth rates would only serve to make the background traffic automatically fail. The justification is further substantiated by the fact that once a roadway becomes saturated (which even with the conservative estimates, many of the roads are forecast to become), then there comes a point where no further traffic can be accommodated. For example, the freeways have existing high traffic volumes and with further growth show warrant for substantial increases in number of lanes to meet capacity. Notably by the time 2040 becomes a reality there will be many new innovations, such as connected vehicles, which will override the need for such extreme number of lane needs and therefore the growth projections are more than reasonable for purposes of forecasting trips through the year 2040. We recommend maintaining the proposed growth rate caps, with the exception of the HEFT facility which has been requested by the Florida's Turnpike to use their provided rates.

**FDOT No. 21:** Page 48, Table I-14: Please label and explain the difference between the 1st and 2nd columns labeled as "Referenced Intersection % Growth". It appears in the Appendix that there are two sets of intersection growth rates for the two Phases (Phase I and Phase II). Please define the Phases in a footnote and label the column appropriately.

Headers will be included in the updated report that identify the two columns as respectively 2015-2020 and 2015-2040 percent growth rates. Column headers match with the column headers from the Appendix I-J which detail initial growth percentages based on the roadway link historically observed growth rates which served as the basis for the development of the estimates presented in Table I-14.

**FDOT No. 22:** Page 53-54, Table I-16: Please check for missing intersections and revise as necessary. Only Intersections 16 through 54 are provided.

**Please refer to response to FDOT Comment No. 6 which addresses the missing page.**

### **Chapter 1, Section 9 - Project Trip Distribution**

**FDOT No. 23:** Socio-economic data was factored to match the daily ITE trip generation calculations for the external trip quantities. How was this performed? The model plots show % trips from the select zone analysis but not the model volumes in Appendix I-M. Please include model volume plots for this select zone analysis.

**The model does not automatically produce the same trip generations as were prepared for the ADM and the Graham sites based on ITE and MOA field studies since the model relies on its own trip generation procedures. The initial SERPM model trips generated for the ADM and the Graham TAZs were adjusted to ensure that the final assigned traffic volumes from these TAZs match with the daily trip generation forecasts presented in Tables I-9 and I-10, respectively. Select zone model volume plots will be added to Appendix I-M of the updated report.**

**FDOT No. 24:** Please provide the methodology for determining the number of households with and without children and vehicle ownership for the Graham Property households where there were not households previously.

**The number of household statistics were based on the existing TAZ referenced for the Graham Project and a review of nearby TAZs. Appendix I-L provided a summary of the original versus revised TAZ household characteristics.**

**FDOT No. 25:** Consistent with the traffic methodology, a new TAZ was created for ADM to force access to HEFT and NW 170th Street. There appears to be a centroid connector near the HEFT and NW 170th Street in the submitted material, though it is not identified as an ADM TAZ and the percent distribution is not depicted. When adding the percent trips on the centroid connectors for the ADM TAZ in Appendix I-M, the percentage sums to only 70% indicating that the other 30% is distributed from the new centroid. Please identify the number of the TAZ added near HEFT and NW 170th Street and what socio-economic data was assigned. The table in Appendix I-L should be updated to reflect this TAZ. Additionally, please denote the TAZ with a star for ADM on the map in Appendix I-L.

**Appendix I-L does include both the "main" ADM and the near HEFT/NW 170th 30% ADM TAZs. It should be pointed out that TAZ 2705 is incorrectly shown in the appendix table titled "Platted Parcels in the Cities of Hialeah Gardens, and Unincorporated Miami-Dade County and Potential Development" but should in fact be TAZ 2748. The table will be refined and the new plots to be provided in an updated Appendix I-M will show the HEFT/NW 170th 30% ADM TAZ.**

**FDOT No. 26:** Please include model plots from the newly created ADM TAZ near the HEFT and NW 170th St interchange showing the select zone analysis in both model volumes and percent of project traffic volumes. This will serve as a check that this methodology for matching the expected regional long distance trip making characteristics works as intended.

**A separate select zone analysis will be prepared for the ADM TAZ located near the HEFT/NW 170th Street interchange. The resulting model plots will be added to Appendix I-M. Three separate plot sets will be provided for respectively the Year 2020 Land Use on 2020 Network, the Year 2040 Land Use on 2020 Network, and the Year 2040 on 2040 Network. Please note that additional manual adjustments were included for the Florida's Turnpike/HEFT/SR 821, the Florida's Turnpike/SR 91, and I-75 to increase the regional distributions and extend the trips beyond the SERPM6.5 subarea model area.**

**FDOT No. 27:** On page 63, a typographical error was noted. References to Table I-8 and Table I-9 should be changed to Table I-9 and Table I-10 instead.

**The ADM and the Graham trip generation table references within the text will be corrected to reflect Tables I-9 and I-10, as correctly noted in the above comment.**

#### **Chapter 1, Section 10 - Project Assignment**

**FDOT No. 28:** Page 58, 60, and 62, Figures I-10B, 11B, and 12B: Please explain why no traffic to/from the Graham Project is assigned for the link of NW 170th Street from NW 102nd Avenue/NW 107th Avenue to NW 97th Avenue, particularly since there is an access point at the location of NW 102nd Avenue/NW 107th Avenue. The 0.0% value is present for both 2020 and 2040 project distributions.

**The model distribution for the referenced roadway link is zero percent due to the fact that three different centroid connectors are available for trips to exit the Graham TAZ. The model assigns the trips based on the "quickest" path. Acknowledging that there will be travelers exiting Graham via the referenced roadway segment, a manual adjustment will be made to the trip distribution figures and the future year roadway link analyses and will be subsequently included in the updated report.**

**FDOT No. 29:** Page 58, 60, and 62, Figures I-10B, 11B, and 12B: Please explain why no traffic is assigned to/from the link of NW 170th Street from NW 82nd Avenue to NW 78th Avenue when both the links to the east and west have project traffic assigned to them.

**Based on the available roadway network, the trips are choosing to take alternate routes to by-pass the indicated roadway link (please refer to the Appendix I-M model plots. No changes are deemed necessary for the analyses since minimal trips are distributed within this general area.**

**FDOT No. 30:** Page 63, Table I-17: Please check the percent distribution values for the link of NW 178th Street between Graham Access and NW 97th Avenue. The values do not match those shown in Figure I-10B.

**The information presented in Table I-17 is correct. Figure I-10B is simply missing the ADM and the Graham percent distributions for this roadway segment. The same applies for Figures I-11B and I-12B. All three figures will be updated to include the missing percent project distributions.**

#### **Chapters 2 through 4 – Link Analysis**

**FDOT No. 31:** The use of ADM or Graham Property traffic should not be included as "background" traffic in the analysis when determining if a facility is backlogged. The determination of backlogged facilities must be re-done to include only approved background traffic. Throughout the submitted analysis, it is stated that backlogged facilities include traffic generated by either ADM or Graham Property, depending on which project was being analyzed. This means that links which fail due to trips from Graham property or ADM are considered backlogged and not subject to

mitigation. This approach to evaluating backlogged facilities is included in the Zoning Link Analysis and CDMP analysis tables in Chapters 2 through 4. Below are examples of roadways identified as backlogged facilities (and failing) because of either ADM or Graham Property traffic.

- a. *I-75 from Miramar Parkway to Florida's Turnpike (Table III-5A)*
- b. *I-75 from Miramar Parkway to Florida's Turnpike (Tables III-5B and III- 5B)*
- c. *I-75 from Florida 's Turnpike to Miami Gardens Drive (Tables II-5B and III-5B)*
- d. *Okeechobee Road from Hialeah Gardens to NW 103rd Street (Tables II-5B and III-5B)*
- e. *Okeechobee Road from NW 103rd Street to SR 826 (Tables II-5B and III-5B)*
- f. *Miami Gardens Drive from I-75 Eastern Ramps to NW 87th Avenue (Tables II-2B and III-2B - )*
- g. *Miami Gardens Drive from NW 87th Avenue to NW 82nd Avenue (Tables II-2B and III-2B)*

**The June 22, 2016 approach for generating background traffic included the approach that the other Project was part of the background traffic and therefore was used to identify the traffic impacts for the other Site. As indicated in the introduction to the Comment Response Set, the request to include Graham project trips for the ADM analysis was first introduced in October 2015 as part of comments received from respectively FDOT, Southeast Florida Regional Planning Council, and the City of Hialeah and the Graham trips were included in the analysis presented in the December 22, 2015 CDMP TIA, following addendum to add the Graham Project to the methodology originally derived for the ADM site. As late as May of 2016, a summary of the different analysis scenarios were shared with Miami Dade County.**

**The June 22, 2016 includes the Combined ADM and Graham analyses, as per the understanding of the applicant, and does show the overall traffic impacts associated with both projects being in place. The intent of this Chapter was to comply with the agency request but was not intended to override the individual Projects' approach of analyzing the other site as background traffic. Therefore the statement that the results were for "informational purposes only" was included.**

**In order to comply with agency concerns and to ensure that the CDMP applications remain on schedule, revised analyses will be prepared to review each Project relative to background traffic without the other Project. Furthermore, the analyses will be updated with new traffic counts as per agency comments, adjustments to the roadway improvement tables also per agency comments, and further review of individual segments to ensure that the latest most appropriate assumptions are being applied.**

**FDOT No. 32:** It was noted in several tables in Chapter 4, particularly Tables VI-5A, VI-5B, and VI-6B, that two segments of I-75 fail in 2020 and 2040 because of ADM and Graham Property traffic. Yet these two segments (I-75 from Miramar Parkway to Florida's Turnpike, and I-75 from Florida's Turnpike to Miami Gardens Drive) are not listed in Mitigation Summary sections or the Executive Summary of the report. Planned improvements to both I-75 segments will increase capacity to accommodate background growth traffic through 2040 and allow the roadway to operate at an acceptable level of service. However, the addition of ADM and Graham Property traffic causes these I-75 segments to fail, according to the submitted analysis. As a result, please identify the necessary improvements for these two I-75 segments to allow them to operate at an acceptable level of service with both project's traffic, and include these improvements under each Mitigation Summary section of the report.

**Please see response to FDOT Comment No. 31 above.**

**FDOT No. 33:** In Chapters 2 through 4, the volumes and lane geometries for various roadways segments for the 2020 and 2040 Zoning and COMP analysis tables differ. When comparing Table II-5A (2040 CDMP Analysis) with Table II-6A (2040 Zoning Analysis) the total trips for a particular roadway segment are not the same. In some cases, the number of lanes (CF + proposed) are different. For example, SR 826 shows 10 lanes in the zoning analysis for 2040 and 10+4/12+4 in the CDMP analysis for 2040. Also, the segment of Florida's Turnpike from SW 8th Street to



SR 836 was assigned 311 combined northbound trips for the 2040 PM peak hour CDMP analysis, but only 307 combined northbound trips for the 2040 PM peak hour Zoning analysis.

Please clarify the apparent project trip assignment and roadway geometry inconsistencies and revise the analyses, as appropriate.

**The 2040 CDMP and the 2040 Zoning analyses represent two different traffic assignments and thus analyses. For the 2040 CDMP analysis, the year 2040 SE data is assigned on the cost feasible network (a.k.a. 2040 network); whereas for the 2040 Zoning analysis, the year 2040 SE data is assigned on just three years of committed roadway improvements similar to the previously utilized "DRI" methodology (a.k.a. year 2020 network). As a result there are two different project percent distributions (Figures I-11A/B vs. Figures I-12A/B) and two different project assignments (as noted by the reviewer). This also explains why there are differences in the number of lanes, and corresponding roadway capacities, shown in the two sample tables as mentioned in the above comment. For the 2020 CDMP and the 2020 Zoning analyses, the results are identical since both rely on year 2020 SE assigned on the 2020 network. Accordingly, no changes are necessary to the analyses presented in Chapters 2 through 4.**

**FDOT No. 34:** The Mitigation Summary in each chapter does not include intersection mitigation. Please add the intersection mitigation summary to this section. This summary is included in the executive summary but does not differentiate between Graham and ADM responsibilities.

**Intersection mitigation summaries will be added to Chapters 2, 3, and 4, as requested. Mitigation responsibilities between the two Sites will be identified as well.**

**FDOT No. 35:** Please revise the analysis of backlogged facilities such that ADM and Graham Property project traffic are not considered as background traffic. In the Intersection ADM Mitigation Summary appendices (II-I, II-J, III-H, III-I), items that are significant are highlighted in yellow. In some cases (e.g., NW 186th Street / Miami Gardens Drive & NW 57th Avenue) mitigation is proposed for turning movements, which includes traffic impacts from both ADM and Graham Property. Intuitively, if both projects contribute significant traffic impacts to a turning movement requiring mitigation, then the mitigation costs should be shared between the two developments. Please clarify how the projects included in the intersection needs of the executive summary were determined to be significantly impacted by ADM and Graham Property developments.

**The updated CDMP report will include reanalysis of all intersections including updating default assumptions, as referenced in earlier FDOT comments. Results will be summarized in each Chapter mitigation section and the Executive summary as requested.**

**FDOT No. 36:** In comparing Table II-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – ADM Impacts and III-4 Zoning Short Term (Year 2020) Study Area Intersection LOS Analysis – Graham Impacts, the LOS with both ADM and Graham Property included do not match. Given that this column should include all trips from both projects, it is expected that the LOS would be the same. Please correct the apparent discrepancy.

**Correct, the intersection LOS values for the two tables should match for the final column with total traffic volumes included when the total volumes are the same, as was the case. In line with the approach to no**

**longer include the other Project as background traffic, the updated intersection analyses outputs will no longer have the same results since there will only be one set of analyses which will be presented (namely the Combined Scenario and for respectively the Year 2020 and the Year 2040 Zoning analyses). These with Combined intersection results, along with the intersection spreadsheets which summarizes individual Project trips, will serve as the basis for identifying the impacts associated with the ADM and the Graham Sites.**

**FDOT No. 37:** Page 83, Table II-4 and Page 112, Table III-4: Please check LOS values for Intersection ID 9 (NW 57th Avenue at Miami Gardens Drive), and explain why this intersection operates better with the additional project trips than with just the background traffic only.

**The intersection should not in theory operate better for the With Project trips than the With Background Only trips but did in few cases due to the fact that individual signal timings were revised. We acknowledge that there were a few cases which should have been better analyzed.**

**FDOT No. 38:** Page 95, Table II-7 and Page 156, Table IV-7: Please check LOS values for Intersection ID 16 (SR 823/Red Road at Turnpike Ramp (E)), and explain why this intersection operates better with the additional project trips than with just the background traffic only.

**Please see response to FDOT Comment No. 37.**

**FDOT No. 39:** Table II-7 is included in both Chapters 2 and 3. Chapter III is specific to the Graham property but the Table II-7 states it is for the ADM impacts. The table appears to be identical including the headers of the table. Please replace Table II-7 in Chapter III with the correct Table III-7.

**The table will be updated to correctly reflect the intersection LOS results for the Scenario being analyzed.**

**FDOT No. 40:** Table II-7 states "Zoning Short Term (Year 2040)." Please change to "Zoning Long Term (Year 2040)."

**The table name will be revised as indicated.**

### **Chapter 2, Section 8 - Mitigation Summary**

**FDOT No. 41:** Page 127, Second Paragraph (sentence before bulleted list): Please clarify if the listed improvements are for the ADM and/or Graham Project. ADM is referenced twice in the noted sentence. This also occurs again on Page 149 in the same location under Section 6.0 Mitigation Summary.

**The text for the Chapters II, III, and IV Mitigation summaries will be updated to state that "A summary of the improvements proposed as part of the study area roadway improvement plan for American Dream Miami and the Graham Project are summarized below and reflect those improvements that are baseline for the two projects, prior to reviewing additional mitigation needs:"**

### **Chapter 3, Section 5 –Year 2040 AM and PM Zoning Analyses**

**FDOT No. 42:** Page 116 – 119, Tables III-5A & 5B: Please check for an error in the font color for columns under Background Trips Peak Hour Peak Dir Analysis NB/EB (Vol/LOS). Not all values in red font are failing.

**The font color will be refined to ensure that just those LOS values which exceed the adopted LOS are indicated as red.**

### **Missing Tables**

**FDOT No. 43:** There appear to be several tables missing from the submittal package (see cursory list below). Please revise the report to include all summary tables.

- a. *The first half of Table II-3B is missing*
- b. *The first half of Table II-5A is missing.*
- c. *The first half of Table II-6B is missing.*
- d. *Table III-5B should be renamed "Table II-5B" to be consistent with the report's naming conventions.*
- e. *The first half of Table III-3B is missing.*
- f. *The first half of Table III-6A is missing.*

**Please refer to response to FDOT Comment No. 6 in regards to the pages missing. Item d will be revised to "Table II-5B."**

### **General Synchro Comments**

**FDOT No. 44:** After reviewing the output from the Synchro analyses there are some discrepancies in the inputs used for the existing and future conditions.

- a. *The peak hour factor for all intersections/approaches was used the default value. Was this discussed and agreed upon during the methodology agreement?*
- b. *Cycle length/offsets and minimum initial (minimum green) did not correspond to Miami Dade County Signal Systems TOD sheets. Also please provide the Signal Timing sheets used as reference for the Synchro inputs within the appendix area.*
- c. *It is not possible to verify the truck percentage used in the analyses due to the output sheets provided. It is important to account for this input in the Synchro analyses. Please provide both the methodology and process for how the truck percentage was chosen for the approaches or intersections and provide the appropriate HCM output from Synchro.*
- d. *For the reference (yield) point, "beginning of green" is used for actuated- coordinated intersections. Was this verified with the Miami Dade County area engineer for these signals? Typically, the majority of signals in the County have a reference point of "beginning of yellow" for the main movements. Please check data and update the analyses with the correct input.*
- e. *Some intersections between the existing conditions and future analyses get switched from actuated-coordinated operation to uncoordinated in the future. Please clarify the reason for this change.*
- f. *For the future analyses, was the signal timing optimized for the "without mitigation" and the "with mitigation" scenarios? Please clarify when optimization was used and if there were any manual adjustments to the timing or other system parameters for the Synchro files.*

All changes requested above will be included in the updated intersection analyses. For the peak hour and the truck percentages, the factors are based on local traffic counts. The peak hour factors will be included in the updated intersection volume spreadsheets (Appendix I-K) and the development of truck factors will be included in a new appendix. Miami Dade County Signal System TOD sheets will also be included in a new appendix. For all other comments relating to signal timing, please refer to response to FDOT Comment No. 12.

## MIAMI-DADE COUNTY TRANSIT, DATED AUGUST 26, 2016 (Revision No. 6):

Miami-Dade County has submitted a report titled “Transit Impact Report” for CDMF Applications the for ADM and the Graham Projects which outlined the forecast transit needs for the two Sites, along with estimated annual operating costs.

The applicant acknowledges receipt of the transit report and intends to work jointly with the County to address transit needs and requirements associated with the two Sites.

## FLORIDA’S TURNPIKE DISTRICT, DATED AUGUST 26, 2016:

The County can consider the District’s comments representative of important Turnpike input as well, with regard to the applicant’s submittal. A couple of additional Turnpike facility specific comments are provided below:

**Turnpike Comment No. 1:** Turnpike projects on the Homestead Extension of the Florida’s Turnpike (HEFT), south of SR 836 (inclusive of managed Express Lanes) are let for construction (Design-Build). The analysis should include these projects.

The proposed improvement tables will be updated to include the mentioned additional project (TIP 435543-1 TP4150514) and the analysis will likewise reflect the improved number of lanes (6 plus 4 express lanes). The applicant has prepared an updated review of the most recent Transportation Improvement Plans for respectively Broward and Miami-Dade Counties and will be updating Tables I-11 and I-12 accordingly.

**Turnpike Comment No. 2:** Turnpike has additional count/toll information available which is not included in the FDOT FTI. The availability of this information was shared with the applicant during the methodology meetings but was not requested by the applicant for the preparation of the analysis.

The applicant appreciates the Turnpike’s offer to supply additional traffic count information and has reached out to request those counts so they can be reflected in an update of the June 22, 2016 report.

**Turnpike Comment No. 3:** HEFT, in the project vicinity, has sustained considerable growth rates (with the exception of recession years). The calculated annualized growth rate (which included recession years) from 2000 – 2015 is 3.5% north of SR 836 and 3.0% south of SR 836. The development of growth rates for this facility should be assessed independently of the other limited access facilities. Information from the Turnpike’s Annual evaluation is provided below for information/reference.

North of SR 836

Weighted Average Growth Rate																Trend		'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015	
45,400	51,100	53,800	59,700	64,600	68,500	71,900	75,200	74,600	73,000	75,500	76,200	78,400	77,900	81,400	89,600	52,051	87,549	3.50%
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015				
12.60%	5.30%	11.00%	8.20%	6.00%	5.00%	4.60%	-0.80%	-2.10%	3.40%	0.90%	2.90%	-0.60%	4.50%	10.10%				

South of SR 836

Weighted Average Growth Rate																Trend		'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015	
48,700	53,300	55,600	60,300	70,300	77,400	81,100	82,200	76,900	72,600	74,300	76,200	78,300	80,400	83,700	90,500	56,598	88,627	3.00%
2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015				
9.40%	4.30%	8.50%	16.60%	10.10%	4.80%	1.40%	-6.40%	-5.60%	2.30%	2.60%	2.80%	2.70%	4.10%	8.10%				

*Follow up Comment Dated Sept. 14, 2016: Please note, that the incorrect summary portion of the growth workbook was submitted with the Turnpike's original comment. The correct annualized growth south and north of SR 836 are 2.4 and 3.0%, respectively."*

North of SR 836

Weighted Average Growth Rate																Trend		'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015	
48,700	53,300	55,600	60,300	70,300	77,400	81,100	82,200	76,900	72,600	74,300	76,200	78,300	80,400	83,700	90,500	56,598	88,627	3.00%
'00-'15 Average Growth	Annual Average Growth (%) Based on Weighted Volumes																	
	2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015			
3.0%	9.4%	4.3%	8.5%	16.6%	10.1%	4.8%	1.4%	-6.4%	-5.6%	2.3%	2.6%	2.8%	2.7%	4.1%	8.1%			

South of SR 836

Weighted Average Growth Rate																Trend		'00-'15 Average Growth
2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2000	2015	
86,100	89,900	99,000	105,400	113,500	120,700	127,900	131,500	123,400	119,300	122,300	124,900	125,700	127,900	131,100	137,200	97,385	138,340	2.4%
'00-'15 Average Growth	Annual Average Growth (%) Based on Weighted Volumes																	
	2000 to 2001	2001 to 2002	2002 to 2003	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	2009 to 2010	2010 to 2011	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015			
2.4%	4.4%	10.1%	6.5%	7.7%	6.3%	6.0%	2.8%	-6.2%	-3.3%	2.5%	2.1%	0.6%	1.8%	2.5%	4.7%			

The growth rates provided with the Turnpike's comment have been reviewed and the analyses will be updated to reflect the referenced 3.0 and 2.4 percent historical growth rates for HEFT, as requested.

## BROWARD COUNTY, DATED SEPTEMBER 1, 2016:

**Broward County Comment No. 1:** It is unclear how the 10.8-percent upward adjustment for light rail transit (LRT) resulted in the addition of 6,481 daily trips and 491 PM peak hour trips. These values do not agree with our calculations. Please provide a worksheet outlining the LRT adjustment calculations and please provide backup for any assumptions accepted for this adjustment.

There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the LRT, was scrutinized to a great extent and does not warrant further review. Also refer to response to FDOT Comment No. 15.

**Broward County Comment No. 2:** It is maintained in the study that the hotel component is an ancillary/complementary land use and was reflected in the trip generation estimates for ADM derived from count data collected at Mall of America (MOA). It was further stated in a reply to a previous comment about the hotel component that the ADM site is not near other Miami-Dade attractions such as the beaches or airport and therefore is not expected to generated trips other than visitors to ADM. In response to the ancillary/complementary land use comment, MOA has 506 rooms on-site to accommodate approximately 4,400,000 square feet (SF) of gross floor area (GFA), or about one room per 8,700 SF of GFA. ADM is proposed to have 2,000 rooms for 6,200,000 SF of GFA which equates to one room per 3,100 SF of GFA. Proportionally, ADM will have 2.8 times more hotel rooms per SF of GFA than MOA and accordingly, it is not reasonable to expect that all guests will be visiting the hotels as an ancillary use of ADM. With regard to the response that the location of ADM is not near other Miami-Dade attractions, it should be noted that there are at least four hotels comprising over 500 hotel rooms in the Miami Lakes Main Street area, located within two to three miles of the site,



also similarly remotely located from the airport and beaches. Therefore, it is not a reasonable assumption that the project's hotels will not generate trips other than ancillary to ADM. Furthermore, as the area develops with other planned and committed projects, the demand for hotel rooms will increase. For the above reasons, we continue to recommend that an adjustment to trip generation be made to account for hotel visits not specifically associated with ADM.

**There has been extensive efforts to ensure that a final trip generation was achieved which could be approved by both FDOT and Miami-Dade County, with correspondence and numerous meetings extending from September of 2015 through March of 2016. Every aspect, including the land use and corresponding trip generation assumptions, was scrutinized to a great extent and does not warrant further review. Furthermore, we should point out that the premise of the comment that the 506 room hotel at MOA is adequate to meet demand at MOA is incorrect. MOA has identified a higher demand for hotel rooms and the 2006 approved expansion plans currently in progress include three (3) additional hotels adding 1,250 rooms for a total of 1,756 rooms. Further, the 2012 Cambridge Systematics survey at MOA reported that 19% of the MOA visitors arrived from nearby hotels/motels. This was all accounted for in the trip generation negotiations.**

**Broward County Comment No. 3:** The analysis shows that Miramar Parkway west of I-75 operates at Level of Service (LOS) C and will continue to do so for future conditions. This was brought up in our previous comments and the response was that the analysis was based on 2014 traffic count data. 2015 traffic counts for the intersection of Miramar Parkway and Dykes Road/SW 160 Avenue (Attachment A) indicating that Miramar Parkway is currently operating overcapacity. Furthermore, Synchro analysis (Attachment B) shows that during the PM peak, the intersection of Miramar Parkway and Dykes Road operates at LOS F.

**The analysis will be updated to reflect the furnished updated traffic count data for Miramar Parkway and the analyses will be revised accordingly.**

**Broward County Comment No. 4:** During the review meeting held at SFRC on January 22, 2016, there was discussion of extending transit to this site and construction of park and ride facilities. Whist Miami-Dade Transit will be the primary service provider, staff would encourage the applicant to explore option for transit service north of the site with Broward County Transit. Transit riders are likely to employees working in retail, hotel and park components of the project. South Broward County has many residential neighborhoods which would be included in the future labor pool.

**Comment and request noted. Additional efforts will be coordinated in regards to transit for the two sites and will be addressed.**

## **MIAMI-DADE COUNTY DTPW, DATED SEPTEMBER 7, 2016:**

**County DTPW Comment No. 1:** Executive Summary: Please explain the 220 [sic 22] various scenarios listed for the intersection analyses. It would appear that only 18 scenarios would be required, 9 alternatives for both AM and PM Peak Hours: 1-Existing, 2 & 3 - Future No-Build (2020 & 2040), 4 & 5- ADM Alternative Only (2020 & 2040), 6 & 7 - Graham Project Alternative Only (2020 & 2040), 8 & 9 – Total Combined Projects (2020 & 2040).

**The above listed 18 scenarios do not take into account the fact that there were also the Year 2020 and Year 2040 Background with ADM and the Year 2020 and Year 2040 Background with Graham intersection analyses submitted as part of the June 22, 2016 report. This approach is no longer being pursued based on agreement coordinated with local agencies, so the total intersection analyses for the updated report will indeed be fewer than the listed 22 analyses.**

**County DTPW Comment No. 2:** Section 1-Overview: What is the difference in the CDMP versus the Zoning analyses? From a traffic analysis perspective, the concern mainly exists with the worst-case scenarios. Please advise.

A more detailed description will be included in the Executive Summary to distinguish between the CDMP, the Zoning, and the Concurrency analyses. Reference will also be made in the document to the email that was provided to Mark Woerner on August 11, 2016 in response to a request for a detailed overview of the differences between the CDMP and the Zoning analyses. The referenced correspondence will be added to the Appendix.

**County DTPW Comment No. 3:** Figure I-3 through 6: Please zoom into the study area and identify the highlighted roadway segments with their street names.

Roadway names will be added to all figures and will be based on the roadway segments that are presented in the various roadway link LOS tables. For all the figures, one consistent roadway description will be chosen for each facility. Due to space limitations, it is not possible to provide all the possible roadway names associated with each facility. Coordination will be made to ensure that the depicted roadway name is consistent with at least one of the roadway names referenced in the various roadway link LOS tables (all of which are consistently named). Notably, the link tables have more space and thus allow the possibility of listing not only local roadway names but also state roadway numbers.

As far as zooming into the study areas, the figures were designed and thus sized to show all roadways links which are being analyzed in the tables. Furthermore, all study area links which meet the 5 percent significance test do for the most part extend to near the boundaries of the base maps used for Figures I-3 through I-6; acknowledging that the study areas for the 2040 on 2040 assignment has a broader range than say the 2020 on 2020 assignment. To accommodate the County's comment, we will make a definite effort to prepare zoomed in maps so that the information presented is more legible. This will include the addition of roadway names as requested in other comments. **In lieu of revising the study area Figures I-3 through I-6 to included zoomed in areas of the larger maps, a table was created with the study area links summarized for each of the Scenarios analyzed based on comment requests for this information. The table is provided in newly created Appendix I-T.**

**County DTPW Comment No. 4:** Section 6.2-Existing Roadway Link Directional PHPs: Please clarify and provide an example for the following statement:

*“For the MDC counts, the PHPs were ratio'ed to the official PHPs identified by the County in its count reports and the directional distributions observed from the raw counts were then used to derive northbound/eastbound (NB/EB) and southbound/westbound (SB/WB) PHP directional volumes.”*

At the request of County staff, a detailed breakdown of the development of PHPs from raw traffic counts (and further to future year background volumes) were detailed in a document furnished to the County on July 18, 2016. The referenced description will be included in an appendix within the updated report for reference purposes for the various review agencies.

To clarify further, depending on whether the raw count had the AM or the PM volume as being the highest, the raw volume was set to represent the highest period and thus assigned the official PHP volume. For example if the highest period occurs during the AM period, then the analyzed AM total PHP volume equals the official PHP. For the same example, the PM PHP is calculated by multiplying the official PHP by the ratio of the raw PM to the raw AM total volumes resulting in a lower volume than the official PHP. For both the highest peak and the other peak, the directional distribution is obtained based on the raw volume splits. A sample calculation will be included in the updated report.

**County DTPW Comment No. 5:** Section 6.3-Existing Roadway Link Directional LOS: Please provide the data assumptions for the roadway segments used to determine the maximum service volume thresholds. Also, there were no FDOT tables included in Appendix I-C, only Intersection TMCs.

A table will be included in the updated report which will detail how each service volume was derived (e.g. existing, 2020, and 2040 roadway networks). ~~This newly created table is included in the new Appendix I-S. Specifically, where available the County's RER database for DOS trip capacities were used as an initial reference for the peak hour service volume (with the understanding that the County has not formally updated information in its database other than the DOS trips).~~ A representative FDOT 2012 LOS Handbook peak hour service volume was then assigned ~~ensuring that the service volume at least equaled or were lower than the County's capacities along with applying any percentage adjustments as per the County LOS standards (referenced in Appendix I-E and new Appendix I-5).~~ Next the corresponding peak hour peak directional service volume was selected to serve as the basis for the capacity volumes utilized. ~~As such, in some cases the County's capacities were applied to adjust FDOT service volumes so that the LOS D or LOS E capacity was set to equal that in the database.~~ FDOT facilities were developed following traditional FDOT requirements using their LOS Handbook directly.

**County DTPW Comment No. 6:** Table I-4: The PM LOS is missing for ID #10. Also, please show the intersection delays for all the LOS Summary tables throughout the report.

**Noted.** The updated table will include the LOS value for this cell along with requested intersection delay information.

**County DTPW Comment No. 7:** Table I-10: The Diverted Trip to Retail Use volumes which were calculated from the ITE Trip Generation Handbook Pass-by Trip volumes for Land Use Code 820 are only valid for the PM Peak Hour since the data was collected for a weekday during the PM Peak Period. No diverted trips should be calculated for the Daily or AM peak analysis. Furthermore, caution should be exercised when using the pass-by fitted curve equation in lieu of non-pass-by trip data as listed in Table F.9 from the ITE Handbook, which includes diverted trip percentages.

~~The trip generation tables will be updated to reflect that there are no diverted AM nor Daily trips, though in reality diverted trips occur throughout the day.~~ **Though we acknowledge the comment above, we still stand by the fact that diverted trips occur during all periods of the day and as such diverted trips will not be removed from the trip generation tables. Furthermore, the lengthy discussion included extensive review of the assumptions used for deriving the trip generation for the two Projects. As mentioned in response to other trip generation related comments, the negotiations included consideration for the fact that shuttle trips were not represented as an additional reduction in the trip generation and thus everyone finalized on the approved trip generation information as of March 2016.**

**County DTPW Comment No. 8:** Table I-10, Note 2: This states that “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.” The table shows the net external trips with the pass-by reductions. Please advise if the pass-by trips were reduced only for the existing roadway facilities. The traffic at the sites’ driveways and new roadways must show 100% trips as these are all new.

Passer-by, also referred to as diverted trips, were exclusively applied to the roadway segments highlighted in green throughout the various roadway segment LOS analyses (e.g. where 10 trip generations information from Tables 9 and Table are being applied to derive Project trips for comparison to available LOS capacity). The specific segments which have diverted trips occur on portions of NW 102nd Ave, Miami Gardens Dr, NW 170th St, NW 97th St, and NW 178th St. These roadways near the site are indeed based on the 100% percent trips and the percent distribution is applied to the trip generation without reduction for diverted trips.

**County DTPW Comment No. 9:** Section 8.3-Background Growth: According to ITE Transportation Impact Analysis for Site Development, growth rates should not normally be employed for horizons beyond 4 to 5 years (i.e. through 2020) because of the variability in growth rates over time and the magnitude of error that can result from a relatively small error in the growth rate over a long period of time (such as using these to generate 2040 volumes).

**Acknowledged.** Since the beginning of the CDMP efforts, growth rates have been the premise for deriving future background volumes. It was recommended as part of the methodology efforts and was subsequently incorporated into both the December 2015 and the June 2016 CDMP reports submitted to the County. Furthermore, caps were set on the growth rates so as to make sure that growth would not continue to be elevated all the way through the year 2040 for those cases where high historical growth rates have been observed in recent years. As such, we recommend maintaining the approach with the capped growth rates (with the exception of the Florida's Turnpike which has provided separate growth rates that they wish to have applied based on their historical growth review).

**County DTPW Comment No. 10:** Table I-16: the first half is missing for ID # I-15.

**The applicant acknowledges that in a number of cases the first half of tables containing two pages were missing (also see response to FDOT Comment No. 17). We apologize for the discrepancy.**

**County DTPW Comment No. 11:** Figures I-10A through 12B: Please explain the major differences in the project distribution percentages between the Zoning and CDMP analyses. For example, the ADM Project Distribution on Figure I-11B is 23.41% for the north-south 4-lane segment near the Graham project. This same link however, is listing a 43.19% ADM Project Distribution in Figure I-12B. Otherwise, most of the percentages are similar to their counterparts as compared in the figures.

**The 2040 CDMP and the 2040 Zoning analyses represent two different traffic assignments and thus analyses. For the 2040 CDMP analysis, the year 2040 SE data is assigned on the cost feasible network (a.k.a. 2040 network); whereas for the 2040 Zoning analysis, the year 2040 SE data is assigned on just three years of committed roadway improvements similar to the previously utilized "DRI" methodology (a.k.a. year 2020 network). As a result there are two different project percent distributions (Figures I-11A/B vs. Figures I-12A/B) as noted by the reviewer.**

**Furthermore, the two Project sites have different trip making characteristics. The ADM will be marketed as a major attraction whereas the Graham represents a combination of more traditional employment and residential land uses. Most of the larger differences in trip distributions between the two Sites occur in the nearby vicinity of their properties which makes sense. For the longer trips, in the majority of cases, the distribution is more similar.**

**County DTPW Comment No. 12:** Section 10-Project Assignment: The diverted trips for the TMVs shown are not shown in detail in Appendix I-K. Please include separate figures to show these volumes.

**The diverted trips only apply to select roadway segments, as indicated in response to DTPW Comment No. 8. None of the intersection analyses are impacted by the distinction between having either the with versus the without diverted trips reflected in the trip generation. All intersection project trips are based on diverted trips excluded from the trip generation and therefore a separate set of figures is not necessary nor are they needed to be shown specifically in the Appendix I-K spreadsheet summaries.**

**County DTPW Comment No. 13:** Table IV-7: This table is numbered IV but should be sequentially numbered VI. Also, this is titled 'Zoning Short Term (Year 2040)' but should be Long Term. Also, please confirm that the signal cycle lengths used in the future analyses were the same as existing. Any deviation from these needs to be documented.

**Acknowledged. Corrections will be made as indicated. The cycle length will be updated such that all future analyses reflect the existing cycle lengths.**

**County DTPW Comment No. 14:** Mitigation Summary (all scenarios): Please ensure that the future LOS intersection analyses does not include improvements at the intersections, such as additional/increased turn bay storages, signal optimization, etc. A comparison of the Future No-Build and Build scenarios needs to be evident. A separate LOS analysis should be made for those intersections requiring mitigation. Also, were there any unsignalized intersections that were identified for signalization in the future?

**The only future mitigation improvements which will be applied are to maximize the intersections to two left turns, three throughs, and one right turn. No additional mitigations will be applied. Also, the signal timings will no**

longer be adjusted to serve as a means for mitigating intersection operations. Before and after mitigation LOS analyses were indeed included in the June 22, 2016 TIA and will be included in the updated report. Finally, there was no unsignalized intersections included in the analyses.

**County DTPW Comment No. 15:** Appendix I-K1: Some of the turning movement volumes do not appear to be adding up correctly. For example, assuming a 1% growth rate from existing to 2020, the background volumes for the AM WB through movement at NW 87<sup>th</sup> Avenue and Miami Gardens Drive should be 1,544; and then adding the ADM and Graham project trips should result in 1,637 instead of 1,621. Please clarify. Also, why are the peak directions different for the two projects during the same peak period?

**The turning movement volumes will be reviewed to ensure that they add up correctly. The differences in the direction of the trips for the two Site's is due to the differences in the land uses and therefore the trip making characteristics. For the ADM Site's, the PM period has inbound as the highest direction (60%) and AM has outbound as the highest (52%). For Graham, PM has outbound highest (54% and 60%) and AM has inbound highest (59% for 2020 and 71% for 2040).**

## **MIAMI-DADE COUNTY RER, DATED SEPTEMBER 7, 2016:**

### **General Comments**

**County RER Comment No. 1:** For each application, include a proportionate share analysis that identifies the applicant's fair share of the cost of the required transportation improvements.

**Fair share will be provided in the updated report.**

**County RER Comment No. 2:** Number all of the pages in the report, including tables and maps.

**Page numbers will be provided on all pages of the report and the appendices.**

**County RER Comment No. 3:** Some pages appear to be missing, i.e. pages 54, 69, 85, 90, 97, 114, 126, 155, and 156.

**Please refer to response to FDOT Comment No. 6 regarding the missing of the first page for a number of the tables. The updated report will be reviewed thoroughly to ensure that no pages are missing.**

**County RER Comment No. 4:** All tables, maps, and corresponding roadway analyses must show all the roadway segments impacted by 5% or more by the projects' impact.

**All the tables and maps include at a minimum all roadway segments with 5% or more significance. In fact, the analyses extend beyond one link outside of the 5% study area to ensure that a thorough inclusion of roadway segments were included.**

**County RER Comment No. 5:** All maps and tables need to be labelled to show the major roadways and corridors, and identify all the state roadways.

**All maps will be updated to include, at a minimum, all names for all roadways which are included in the analyses. State road names will also be added where applicable. Please also refer to response to DTPW Comment No. 5 which describes the premise for how the naming will be included on the figures.**

**County RER Comment No. 6:** List all roadway segments in an orderly fashion from north to south and west to east.

**For logistical purposes, we are unfortunately not able to accommodate the request to reorganize link LOS tables so that all roadways are listed from north to south and from east to west. The tables provided in the report are based on extensive Excel files which have in excess of 40 different tabs with linked formulas and information and it simply would be nearly impossible to restructure everything to accommodate what would otherwise be a simple and logical request.**



**County RER Comment No. 7:** The roadway links for the existing and year 2040 should correspond to the maps.

**Please refer to other County comments relating to roadway links and their naming coordination between Tables and Figures.**

**County RER Comment No. 8:** Only projects listed in the Cost-Feasible Plan of the County's 2040 Long Range Transportation Plan (LRTP) should be considered for future 2020 and 2040 analysis.

**Acknowledged, Tables I-10 and I-11 have been updated to ensure that only Cost Feasible Plan projects are included. The analyses have been updated accordingly.**

**County RER Comment No. 9:** Reference to "FDOT Comments" refers to FDOT's letter dated August 5, 2016.

**Acknowledged.**

**County RER Comment No. 10:** RER staff reserves the right to provide additional comments later and will continue to finalize review of the Revised Traffic Impact Analysis (TIA).

**Acknowledged.**

**Page 1, Executive Summary**

**County RER Comment No. 11:** Clarify if the 70,000 and 10,000 external trips (paragraph three) are daily or PM peak hour trips.

**The trips will be clarified as being daily trips.**

**County RER Comment No. 12:** Page 4, last paragraph, clarify locations in bullet point three and four, and for any other corresponding reference to these locations.

**Roadway names will be reviewed and further clarification will be provided for the referenced bullets.**

**County RER Comment No. 13:** Clarify the difference between the concurrency, CDMP, and zoning analyses performed.

**Please refer to response to DTPW Comment No. 2.**

**CHAPTER I GENERAL INFORMATION**

**Page 16, Figure I-1 Project Location and Existing Roadways**

**County RER Comment No. 14:** Show and label all major section line roadways, with the number of lanes, for the entire Study Area.

**Please refer to earlier responses on this subject.**

**County RER Comment No. 15:** Add the following missing interchanges on SR 826: NW 67 Avenue, NW 57 Avenue, and heading further east until the Golden Glades interchange.

**The interchanges will be added to Figure I-1.**

**County RER Comment No. 16:** Correct mislabeled "I-75" icon depicted on SR 924/Gratigny Parkway, and on all other applicable maps.

**Correction will be made as noted.**

**Page 17, Figure 1-2 Preliminary Access Plan**

**County RER Comment No. 17:** Site Plan does not show location of applicant's proposed park and ride facility for Miami-Dade Transit (MDT), please revise Site Plan to depict location of Park and Ride facility.

**Figure I-2 does include the proposed park and ride facility but is shown in small print. To more clearly highlight the facility, an additional label will be added to the figure.**

## **Page 19, Section 5 Study Area**

**County RER Comment No. 18:** Provide a complete listing of the roadway links depicted in Figures I-3 through I-5.

**A listing will be included in the updated report, as requested.**

**County RER Comment No. 19:** For Figure I-3, I-4 and I-5 label all major section line roadways and other roadway facilities that are impacted 5% or more by the projects to define the study area.

**Please refer to earlier responses on this subject.**

**County RER Comment No. 20:** The 5% analysis to determine the study area boundaries for the existing, future 2020 and 2040 should include all the major section line roadways within the study area.

**Figures I-3, I-4, and I-5 serves to illustrate where the 5% significance test has been met. Also refer to response to RER Comment No. 19.**

## **Page 23, Figure 1-6 FDOT and County Count Station Map**

**County RER Comment No. 21:** Label the corresponding roadways for the traffic count stations depicted.

**All figures will be updated to include more detailed roadway information, as mention in response to other County comments. With the wealth of information shown on the traffic count station map, we will do our best to fit roadway names in as best as we can with the ultimate goal of having all roadway segments being analyzed having at least one roadway name referenced (e.g. local name, state roadway number, etc.).**

**County RER Comment No. 22:** List all the traffic counts stations, not just ones impacted by the 5% of the projects' trips.

**We have included ALL traffic count locations which have been referenced in the analyses. As such, traffic count stations are listed beyond the 5% significant study area roadway link locations.**

## **Page 24, Section 6.2 Existing Roadway Link Directional and Section 6.3 Existing Roadway Link Directional LOS**

**County RER Comment No. 23:** List which peak season count factors were used.

**In the June 22, 2016 report, the 2014 peak season factors were applied to all traffic counts (e.g. 2014 and 2015 counts) since this was the latest information available at the time of these tables being prepared. For the updated report, there will be synopsis reports outside of the 2014 time frame (both earlier and later). We will have access to 2014 and 2015 peak season factors which will be applied based on the closest year the counts were taken. The report text will be updated to reflect the methodology applied for using peak season factors.**

**County RER Comment No. 24:** Correct reference to FDOT's Generalized Table to Appendix I-E (not I-C).

**Correction will be made.**

**County RER Comment No. 25:** Please consider using FDOT's synopsis reports to obtain the actual peak hour, peak direction volumes, when available.

**Synopsis reports have been requested for all traffic counts which did not have synopsis reports on FDOT Traffic Online website. The counts and PHPs will be updated based on the more detailed traffic counts.**

**County RER Comment No. 26:** Utilize the County's 3-day traffic counts.

**The County's three day traffic counts will be averaged and used to update PHPs for all MDC count station locations.**

**County RER Comment No. 27:** Provide detailed explanation on how the directional peak hour period (PHP) volumes for the County stations were derived.

**Please refer to response to DTPW Comment No. 4.**

**Pages 25-27, Table I-1 Year 2015 Area Roadway Segment Existing AM and PM PHP Summary**

**County RER Comment No. 28:** Provide copies and identify source of the 15-minute FDOT/MDC/Broward County counts.

**Copies were provided in Appendix I-B. The updated report will include refinements to Appendix I-B to reflect the updated synopsis reports received for this report. One traffic count report copy is provided per count location and matches with the information presented in the various tables that reference count data, including historical, PHP, and existing information.**

**County RER Comment No. 29:** Revise the table, corresponding maps and list all the roadway segments according to the identified study area, for example:

- a. NW 107 Avenue needs to be depicted from Okeechobee Road to NW 170 Street;

**The roadway segment will be ~~added~~ updated as requested. Note, the analyses actually include the segments from NW 170th St to NW 138th St and from NW 138th St to NW 122nd St. The later segment was reduced to indicate from NW 138th St to Okeechobee Rd to comply with the County's request.**

- b. SR 826/Palmetto Expressway needs to be depicted from SR 836/Dolphin Expressway to NW 27 Avenue;

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

- c. Extend the analysis for the HEFT to the Mainline Turnpike;

**The analyses already include referenced HEFT segments extending all the way to Mainline Turnpike. No changes are necessary since already included.**

- d. Interstate I-75 ends at the Palmetto Expressway/SR 826, delete the roadway segment from NW 57 Avenue to LeJune as it is part of SR 924/Gratigny Parkway;

**~~The requested roadway segment will be deleted from the analyzed tables.~~ In lieu of deleting the requested roadway segment, the three segments extending from SR 826 to NW 32nd Ave where separated from I-75 and labeled as SR 924/Gratigny Pkwy.**

- e. Miami Gardens Drive needs to be extended to NW 27 Avenue;

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

- f. NW 138 Street ends at Okeechobee and does not continue to the HEFT;

**The segment on NW 138th St between NW 138th St and HEFT will be removed from the existing, all 2020, and the 2040 Zoning tables. For the 2040 CDMF analyses, SR 924 will be extended to connect with HEFT per LRTP Priority II, Project No. 30.**

- g. NW 87 Avenue needs to be extended from NW 154 Street to Okeechobee Road.

**The analyzed roadway segments for this corridor for the June 22, 2016 submittal extend to at least one link beyond the 5% significance test. A preliminary review of the revised project distribution indicates that the addition of the requested roadway segment may be warranted. We will update the tables accordingly.**

- h. NW 122 Street needs to be extended to LeJune Road;

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

- i. SR 826/Palmetto Expressway needs to be extended south to SR 836/Dolphin Expressway.

**The analyzed roadway segments for this corridor already extend to at least one link beyond the 5% significance test. No additional roadway segments are warranted.**

**Pages 28-29, Table I-2 Existing (Year 2015) Study Area Roadway Segment LOS Analysis**

**County RER Comment No. 30:** Identify the FDOT and County traffic count stations for the roadway segments.

**Count Station IDs will be added to ALL roadway link tables.**

**County RER Comment No. 31:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.

**Please refer to response to DTPW Comment No. 5.**

**County RER Comment No. 32:** Adopted LOS values need to follow the Level of Service Standards in the Transportation Element of the CDMP.

**The Transportation Element will be reviewed to ensure that all LOS standards follow the County's adopted criteria.**

**Page 38, Table I-9 Trip Generation Summary for American Dream Miami**

**County RER Comment No. 33:** Document the calculation used to arrive at the 6,481 Daily trips and 491 PM Peak Hour Trips based on the 10.8% LRT adjustment. RER concurs with FDOT Comment No. 15 which also questions this.

**Please refer to response to FDOT Comment No. 15.**

**County RER Comment No. 34:** Clarify the vehicle occupancy value used to calculate the LRT adjustment.

**Please refer to response to FDOT Comment No. 15 which also addresses the vehicle occupancy rates.**

**County RER Comment No. 35:** The AM/PM internal capture, although it is 0, is labeled incorrectly for each of these corresponding tables.

**Not clear what the reviewer is referring to. Will add a note behind the 0.0% to indicate that it is "of the total trip generation" similar to the LRT adjustment and the diverted trips which have note that it is "of the net external trips."**

**Page 41, Table 1-11 Future Year 2020 Roadway Improvements**

**County RER Comment No. 36:** Remove NW 97 Avenue from NW 154 Street to NW 170 Street from the Year 2020 Committed Improvements list as that roadway already exists.

**Project will be removed from Table I-11.**

**Page 41, Table 1-12 Future Year 2040 Roadway Improvements**

**County RER Comment No. 37:** Clarify that NW 107 Avenue from NW 138 Street to NW 170 Street and NW 102 Avenue from NW 170 Street to NW 178 Street are not part of the Cost Feasible Plan.

**The two projects will be listed separate from the Cost Feasible Plan projects so as to clearly distinguish that they are not 2040 LRTP CF projects.**

**County RER Comment No. 38:** Remove the following from list and corresponding analysis:

- a. Okeechobee Road from NW 154 Street to HEFT, as the Priority IV project is for grade-intersections from Krome Avenue to SR 826/Palmetto Expressway. RER concurs with FDOT's Comment No. 18 that the SERPM model is a tool and should not be utilized as a source.

**Okeechobee Rd will be removed from Table I-12 and will no longer be shown as a Cost Feasible project. Acknowledge request to remove/redesignate the three projects indicated as SERPM model source (reference FDOT Comment No. 17 in regards to I-75 from I-595 to Pines Blvd being a Design Build TIP project).**

- b. NW 138 Street to SR 924 (a state road only east of I-75), and correct listing of the project as the boundaries are from the HEFT to SR 826.

**NW 138th St improvements will be updated to show Florida's Turnpike to SR 826 (e.g. HEFT to SR 826). In that respect, for 2040 the roadway link LOS segments description will be changed to show from Florida's Turnpike to SR 826; whereas the existing, all 2020, and the 2040 Zoning roadway link segments will remain from US 27/Okeechobee Rd to Hialeah Gardens Blvd as previously analyzed. Furthermore, the existing NW 138th St roadway link segment from Florida's Turnpike to US 27/Okeechobee Rd will be removed from the link tables per RER Comment No. 29-f.**

- c. HEFT – correct reference from SW 8 Street to SR 836, as that will be widened to 10 lanes, not “10+4” lanes.

**A review of existing Google maps shows the referenced segment as existing 10 lanes. To comply with the above request, the existing ~~and year 2020~~ number of lanes will be assumed as 8 lanes with widening to 10 lanes by ~~2020~~ 2040 (~~CDMP analyses only as it is a Cost Feasible Plan project outside of the TIP~~). Please also refer to Turnpike Comment No. 1 which indicates that this segment has already been let for construction as a Design Build and will be completed by 2019.**

- d. SR 826/Palmetto Expressway – reference should be corrected to I-75, from NW 170 Street to SR 826.

**Table I-11 (Year 2020 Committed Improvements) will be updated to separate TIP Project 732687 into the following:**

- **I-75 from NW 170th St to SR 826**
- **SR 826 from I-75 to Flagler St**

- e. SR 826/Palmetto Expressway – correct the future number of lanes and corresponding analysis from “10+4” to 10 lanes (will be widened from 8 to 10 lanes).
- f. Correct other two references to “12+4” lanes on SR 826, as West Flagler Street to I-75 and I-75 north to Dade/Broward County line will be widened with express lanes to a total of 8 to 10 lanes; SR 826 from I-75 to NW 103 Street will be widened with express lanes to a total of 8 to 10 lanes; and SR 826 from NW 103 Street to Flagler street will be widened with express lanes to a total of 10 to 12 lanes.

**Responses for e) and f): We have reviewed FDOT's website <http://palmettoexpresslanes.com/> to clarify the number of lanes being implemented for SR 826. Based on FDOT's information, we will reanalyze SR 826 by 2020 as:**

- **I-75 to NW 103rd St - 6 general use lanes plus 4 express lanes (total 10 lanes)**
- **NW 103rd St to NW 36th St - 8 general use lanes plus 4 express lanes (total 12 lanes)**
- **NW 36th St to Flagler St - 10 general use lanes plus 2 express lanes (total 12 lanes)**

**TIP Project No. 4326871 is scheduled to be completed by 2017. Furthermore, based on the County's comment above, the existing SR 826 laneage will be analyzed as 8 lanes or 10 lanes depending on the segment reviewed. SR 826 north of I-75 is not analyzed in the report tables but since it is part of Project**



No. 4326871 will be included in the improvement table as 6 general use lanes plus 2 express lanes (total 8 lanes) per the FDOT website.

- g. RER concurs with FDOT Comment No. 33 regarding the listing of the “10+4” and “12+4” lanes listed for the 2040 CDMP analyses.

Please refer to response to FDOT Comment No. 33 which addresses the differences between the 2040 CDMP and the 2040 Zoning analyses and why there were differences in the number of lanes between the two Scenarios, as per the roadway improvement lists reflected in the June 22, 2016 report.

#### **Page 45 Section 8.3 Background Growth**

**County RER Comment No. 39:** RER concurs with FDOT’s Comment No. 20 questioning the rationale for the cap placed on growth rate. Florida’s Turnpike Authority has indicated that their facilities sustained considerable growth rates, and due to this they request that independent growth rates be used for their facilities, separate from the rates used for other limited access facilities.

**Please refer to FDOT Comment No. 20.**

**County RER Comment No. 40:** RER Staff emailed on January 28, 2016 a map, table and corresponding traffic reports for approved plats within the vicinity of the ADM and Graham projects. As there is no reference to usage of said information, please revise for inclusion as background growth.

**Acknowledged.** The vested trips were included in the model assignments but were not considered in the Concurrency analyses. The updated report will include a separate column for the provided approved platted trips so that they can be included in the total DOS plus platted vested trips. Coordination was made with RER staff during the updating of the vested trips information included in the updated CDMP TIA report. As a result, the September 2016 FDOT and MDC vested trip databases were used in place of the April 2016 version. All projects related to County unincorporated areas were addressed with the County with regards to their more recent September 2016 databases. In addition, requests were made from several municipalities to obtain traffic impact analysis studies related to the 18 platted projects referenced in Appendix I-S. Based on information received a summary of the available vested trip information beyond the County’s database DOS trips are included in Appendix I-S. The future year growth rates for the Zoning and the CDMP analyses were will be checked against the vested trips to ensure that at a minimum the review the differences between the Year Concurrency and the Year CDMP/Zoning growth rates account for both sets of vested trips. Based on the review, it was established that in some cases the forecasted 2015 plus vested trips exceed the historical growth projections. Given that the 2015 plus vested trips is a layering of trips and does not take into account redistribution of trips to paths that are less congested, it was determined that the historical growth projections were appropriate for use for background traffic associated with the CDMP and the Zoning analyses. A separate set of PM Concurrency link LOS analyses continues to remain in the updated CDMP TIA based on the 2015 plus vested trips layered approach (e.g. Tables II-1, III-1, and IV-1 for the ADM, the Graham, and the Combined analyses).

#### **Pages 46-47, Table 1-13 Year 2020 and Year 2040 Roadway Background Future Growth Rate Summary**

**County RER Comment No. 41:** Revise to provide analysis on the PM peak hour average of the County’s traffic counts for the three-day period which provide a more comprehensive average, rather than the first day of the successive three-day count.

**See response to earlier RER Comment on this subject (e.g. RER Comment No. 26).**

**County RER Comment No. 42:** For the background analysis for both ADM and Graham, revise to omit the background traffic of the other application.

**Please see lengthy reply to FDOT Comment No. 31 which refers to the same request.**

**Page 49, Section 8.5 Background Roadway Link Directional LOS**

**County RER Comment No. 43:** Please provide information as to how the service volume values were converted into directional LOS values

**Please refer to response to DTPW Comment No. 5.**

**Page 50, Table I-15 Year 2020 and Year 2040 Roadway Segment Future Background AM and PM PHP Summary**

**County RER Comment No. 44:** Revise to provide a separate column for FDOT and County vested development orders (DOS) trips, instead of including them as part of the overall background.

**The FDOT and County vested trips will be separated, as requested.**

**Page 66, Section 10 Project Assignment**

**County RER Comment No. 45:** RER concurs with FDOT's Comment No. 28 questioning the 0.0% trip assignment to/from the Graham project within the roadway link of NW 170 Street from NW 102 Avenue/NW 107 Avenue to NW 97 Avenue.

**Please refer to response to FDOT Comment No. 28.**

**County RER Comment No. 46:** RER concurs with FDOT's Comment No. 29 questioning why no trips were assigned for the roadway link of NW 170 Street from NW 82 Avenue to NW 78 Avenue.

**Please refer to response to FDOT Comment No. 29.**

**Page 66, Section 9 Project Trip Distribution**

**County RER Comment No. 47:** RER concurs with FDOT's Comment No. 23 regarding clarification of the socio-economic data and requesting inclusion of the model volume plots.

**Please refer to response to FDOT Comment No. 23.**

**CHAPTER II ADM FUTURE TRAFFIC IMPACTS**

**County RER Comment No. 48:** RER concurs with FDOT's extensive Comment No. 31 that backlogged facilities should only include traffic from approved development—it should not include traffic generated by either the ADM/Graham projects.

**Again, please refer to lengthy response to FDOT Comment No. 31.**

**Page 72, Section 1.0 Year 2020 PM Concurrency Analysis**

**County RER Comment No. 49:** Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15.

**Table I-13 is simply shown for the purposes of deriving future percentage growth based on historical daily counts. Table I-15 then takes the derived growth rates and applies them to existing 2015 PHPs to obtain future year 2020 CDM/ Zoning, year 2040 CDM, and year 2040 Zoning peak hour peak direction forecasts. Table I-15 also compares the forecasted growth projected future volumes to the vested trips included with the Concurrency forecasts. A verification was made to ensure that at a minimum the growth-derived volumes exceeded the vested trip forecasts. As such, the vested trips, which are in terms of peak hour two-way trips, was not applicable to the growth forecast information presented in Table I-13.**

**Page 73, Table II-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-ADM PM Impacts**

**County RER Comment No. 50:** Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment.

**Please refer to earlier response to similar request (RER Comment No. 30).**

**County RER Comment No. 51:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.

**Please refer to response to DTPW Comment No. 5.**

**County RER Comment No. 52:** The values in the “Adopted LOS” column need to be consistent with the adopted CDMP Level of Service Standards in the Transportation Element.

**Please refer to response to RER Comment No. 32.**

**Page 91, Section 6 Impact Fee Assessment**

**County RER Comment No. 53:** The response to Question 10 of the DRI analysis indicates that road impact fees are expected to be paid in the amount of \$110 million. Appendix II-A ADM Preliminary Impact Fee Analysis lists an impact fee of \$58,752,501 for ADM and an impact fee of \$7,439,278 for Graham for a total of \$66,191,779. Revise to resolve differences between the two figures.

**The applicant will review the two earlier submittals and differences between the two will be resolved. The updated CDMP TIA report appendices on traffic impact fees will be refined, as applicable. Based on coordination with the applicant, the information presented in Appendices II-A and III-A represents the latest available transportation impact fee calculations for the two Sites. The estimates take into account the March 2016 approved trip generation information and therefore includes more refined impact fees than the December 2015 \$110 Million estimate submitted as part of response to Question 10 of the DRI (e.g. Zoning) analyses. The transportation impact fee information included in the June 22, 2016 CDMP TIA will be maintained in the updated version of the report.**

**Page 101, Section 1.0 Year 2020 PM Concurrency Analysis**

**County RER Comment No. 54:** Table I-13 reflects background growth rate summary and does not show the background PHP values with the DOS trips (vested trips) as shown in Table I-15

**Please refer to RER Comment No. 49.**

**Page 102, Table III-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis-Graham PM Impacts**

**County RER Comment No. 55:** Provide a separate column to show the Traffic Count Station used for each corresponding roadway segment

**Please refer to earlier response to similar request (RER Comment No. 30).**

**County RER Comment No. 56:** Provide information used to determine the Peak Hour Peak Direction Service Volumes thresholds.

**Please refer to response to DTPW Comment No. 5.**

**County RER Comment No. 57:** The values in the “Adopted LOS” column need to be consistent with the adopted CDMP Level of Service Standards in the Transportation Element.

**Please refer to response to RER Comment No. 32.**

## **CHAPTER IV COMBINED FUTURE TRAFFIC IMPACTS**

**County RER Comment No. 58:** Relabel Tables VI-2B, VI-3A, VI-5A, VI-5B, VI-6A, VI-6B to IV-2B, IV-3A, IV-5A, IV-5B, IV-6A, and IV-6B to be consistent with the rest of the tables in Chapter IV and listed in the table of contents.

**Will update as noted.**

### **Page 131, Table IV-1 Concurrency Short Term (Year 2020) Study Area Roadway Segment LOS Analysis – Combined ADM/Graham PM Impacts**

**County RER Comment No. 59:** Please clarify how the information provided in this table differ from the information provided in Chapters II and III, Tables II-1 and III-1 Concurrency Short Term (Year 2020).

**The information shown in the three Scenarios and their Concurrency tables are essentially the same. All three tables have the same number of concurrency "pure" background trips (e.g. include vested trips as opposed to growth-derived trips) and the same number of total overall trips. The only differences between the tables were whether or not each Scenario considered the other Site's Project trip as additional background trips (e.g. Chapters II and III) or included the trips as "Project Trips" in the case of the Combined Scenario. The updated approach for the revised report will no longer include the other Project trips as background trips, as discussed in response to various comments from review agencies.**

### **Pages 149 and 157, Section 9.0 Mitigation Summary**

**County RER Comment No. 60:** Correct references in the first and second paragraph to the ADM project mentioned twice and include reference to the Graham project.

**Correction will be made.**

**County RER Comment No. 61:** First paragraph, Applicant states they are working with various agencies on a “study area roadway improvement plan to include.... with development timelines.” Clarify which agencies they are working with, what formalized agreements have been entered, and provide development timelines.

**Information will be included in the updated report, as requested.**

**County RER Comment No. 62:** The applicant states the previously mentioned roadway improvement plan will “accelerate several cost feasible” priorities from the County’s Adopted 2040 Long Range Transportation Plan (LRTP) into an “earlier timeline.” However, Project No. 2 (the new interchange at HEFT and NW 170 Street) is not part of the Cost Feasible Plan, but is instead listed as a private improvement. Revise to include the appropriate reference to the non-cost feasible plan and to clarify which LRTP Priority the improvements fall under, or if they are not included in the 2040 LRTP.

**Clarification will be provided, as requested.**

**County RER Comment No. 63:** All the list of improvements with the exception of the NW 102 Avenue and NW 107 Avenue projects, were assumed to be in place by 2020. Please refer to previous comment and advise feasibility and method by which applicant proposes to advance and pay for the LRTP priorities. As noted, one project is not part of the 2040 LRTP Cost Feasible Plan, and the project on NW 170 Street from the HEFT to NW 97 Avenue is a Priority III (2026-2030).

**Clarification will be provided, as requested.**

**County RER Comment No. 64:** Page 98 in Chapter II of the ADM Mitigation Summary Section, projects 4 and 5 in the numbered 1 through 9 list of improvements refer to the “ADM Project Access Road”, while on Page 127, Chapter III in the Graham Mitigation Summary Section, lists as project 13 and 14 the “Graham Project Access Road.” Page 149 in Chapter IV of the Combined Future Traffic Impacts lists the previously mentioned projects 4, 5, 13, and 14 as the “Graham Project Access Road” with the improvements numbered 1 through 9. Please resolve those differences.

**Differences will be resolved in the updated report.**

**County RER Comment No. 65:** Please clarify the two additional project improvements listed under “Year 2040”. Also, the improvements do not show the backlogged facilities also needing roadway improvements in order to meet acceptable LOS operating conditions.

**As indicated in other responses, the Executive Summary along with the individual Chapter Mitigation Summaries, will be updated to include not only Project-related mitigation results but also backlogged needs and roadway improvement assumed to be in place for each Scenario.**

**County RER Comment No. 66:** Re-evaluate reference to backlogged facilities, in reference to RER previous comments under “Chapter II ADM Future Traffic Impacts.”

**Please refer to RER Comment No. 48.**

**County RER Comment No. 67:** The last sentence on Page 157 states that “alternative travel modes” will be “addressed separate of this Report.” As the application is currently undergoing review, that analysis needs to be provided now.

**Understood. The updated report will provide information pertaining to alternative travel modes and will specifically address the availability of shuttle buses to and from the Sites for nearby hotels, airports, etc.**

## **CITY OF MIRAMAR, DATED SEPTEMBER 12, 2016:**

City of Miramar staff has reviewed the applicant's responses to the Cities comments submitted on February 2, 2016. New staff comments are shown in italics below.

**Miramar Comment No. 1:** Direct transit service should be provided from the American Dream Miami Mall and Graham industrial/retail development to the park and ride lot at Miramar Regional park and the Miramar Town Center Park and Ride.

*The applicant stated that detailed transit routes will be discussed at a later date. Transit routes and connections into Miramar need to be discussed during the review of the CDMP application to identify options to relieve roadway congestion. Discussing this issue during the CDMP process will also help county and city officials plan for additional multi-modal options to serve employees and visitors.*

**Further detail regarding transit opportunities will be addressed in the updated report including planned shuttle services operated by ADM.**

**Miramar Comment No. 2:** At a minimum, the analysis should evaluate traffic impacts to Miramar Parkway, Pembroke Road, Red Road/NW 57th Avenue and Flamingo Road/NW 67th Avenue. A level of service analysis at project buildout should be provided for all of these roadways.

*The applicant referred to their response to Broward County Comment No. 11. Broward County Comment No. 11 only refers to Flamingo Road. There are several other roads listed in our comment. The applicant did not respond to impacts on these roads.*

**The applicant's intent was to state that the comment which was included for Flamingo Road applied to all other roadways listed. With the understanding that the City continues to see a relevance for these facilities to be included in the analyses, we have taken another look at the project percent distributions for the ADM and the Graham Sites relative to the respective roadway corridors. In the spirit of accommodating the City's concerns we will add NW 57th Ave and NW 67th Ave corridors to the analyses, though there is less than 1 percent of project traffic assigned to the roadway segments north and south of Miami Gardens Rd where the traffic is the heaviest. NW 57th Ave north and south of the HEFT interchange we will also review any impacts since this facility has near 3 percent project contribution. Miramar Pkwy was already included in the June 22, 2016 analyses. For Miramar,**



it included up to 4 percent significance with a six lane capacity. Since fewer trips will be associated with the Pembroke facility which is also a six lane facility, we do not see the need to analyze this facility.

**Miramar Comment No. 3:** The Miramar Parkway buildout year volumes shown in Tables 9 and 10 of the Transportation Impact Analysis are lower than projections prepared by the Broward Metropolitan Planning Organization. The developer's traffic consultant should meet with the City of Miramar, Broward County, and Broward Metropolitan Planning Organization to discuss the impacts to City roadways and potential mitigation. The City is in the process of updating its Capital Improvement Program to include the extension of Miramar Parkway from its current terminus at SW 192 Terrace to Pembroke Road at SW 196 Avenue . The extension of Miramar Parkway to Pembroke Road will help alleviate the current traffic problem at Miramar Parkway/1-75 Interchange, improve the Level of Service at this intersection and provide an alternate north-south route via US 27.

*The applicant states that this improvement is included in the Year 2020 Cost Feasible Plan. The extension of Miramar Parkway to US 27 is currently included in the 2040 Long Range Transportation Plan for funding between 2031 and 2040. This improvement should be expedited and constructed prior to the American Dream Miami Mall and Graham industrial/retail developments.*

The applicant will review the Broward adopted LRTP and most recent TIP and depending on the funding commitment will add this as an improvement to Table I-11 (Year 2020 Committed Improvements) or Table I-12 (Year 2040 Cost Feasible Plan Improvements). We can only assume the project is funded by the year 2020 if it is actually included in the Broward Transportation Improvement Plan, even if efforts are ongoing to expedite the project to be completed earlier. We have to proceed with the information which is available at this time.

## **TOWN OF MIAMI LAKES, DATED SEPTEMBER 13, 2016:**

**Miami Lakes Comment No.1:** Though according to the traffic consultant, the trips from each of the two projects combined for the determination of significant trips on each link is included in the traffic study, at the very least this is not reflected on the maps (I-10A, I-10B, I-11A, I-11B, I-12A and I-12B). To be clear, determination of the 5 percent significance threshold should be included as if the two applications were one project and NOT with one project included as “background” traffic of the other.

The traffic analyses have been prepared so that each Project's trips are shown separate from the other Project's trips even when the trips are added together to achieve total overall trips. This allows the reviewer to be able to see that the individual project trips do not vary regardless of which Scenario is being reviewed. We do not see the need to add a combined Project distribution as the Projects will not be assessed as a Combined Project for mitigation purposes. In order words, a Combined percentage would not be the premise to identify whether the 5 percent threshold has been met. Chapter IV will be maintained in the updated report for informational purposes only.

**Miami Lakes Comment No. 2:** Please re-examine the trip distribution analysis to determine whether NW 67<sup>th</sup> Avenue should be included. The maps appear to show ZERO trips added to NW 67<sup>th</sup> Avenue, which seems unrealistic considering there is not another north-south surface street to traverses all through the area covered by the map for two miles to its west (to NW 87<sup>th</sup> Avenue).

NW 67th Avenue will be added to the analyses, as requested. There is less than one percent project trips on the segments in the surrounding area but it is clear that this is an important facility to the Town. With the facility having six lanes of capacity north and south of the Miami Gardens Drive the project trips to capacity ratio will be well below the 5 percent significance test.

**Miami Lakes Comment No. 3:** As expressed before, the required traffic methodology for both Comprehensive Plan amendments and for concurrency determination are inadequate (as proven by existing traffic conditions despite the existence of the concurrency system for decades), and help to create a situation where driving is the only viable option. At the same time, if a road is already failing, then according to the consultant, there is no mitigation requirement to the applicant, regardless of how many additional trips are being added to a failing segment. Given the size and significance of each of these projects, and certainly their significance when considered together, the County should consider a plan for true multi-modal mobility in this area, and charge the applicant for needed multi-modal improvements based on the number of daily trips generated. This would give the County the policy flexibility to provide viable alternatives to automobile travel, rather than undermining walking, transit and bicycling as possibilities in the (hopeless, by all available evidence) pursuit of free flowing traffic.

**Comment acknowledged. The County has prepared a proposal for the transit impacts associated with the two Sites. The Transit Impact Report information will be reviewed and addressed as part of Miami-Dade County's request to elaborate further on transit proposed for the Sites as part of the updated report.**

**Miami Lakes Comment No. 4:** Much of the discussion at Friday's meeting centered around the possibility of bringing new transit infrastructure directly into the development(s). Are plans/designs for any road or other right-of-way improvements (i.e. 170<sup>th</sup> Street, 186<sup>th</sup> Street, etc.) being developed in a way that will accommodate this possibility?

**Just to clarify, there was no stated commitment regarding adding transit "infrastructure" in the form of light rail transit or similar exclusive transit corridor operations to the two Sites at this time. There was discussions about the potential for future consideration of transit infrastructure similar to what is in place at Mall of America where LRT has been in place for some time. Since there are no planned or programmed alignments to work from at this time, further details or considerations of right-of-ways are premature at this stage. Following the original response to comments, coordination was made with Town of Miami Lakes staff to review the need to include the extension of Miramar Pkwy from its existing termini to Pembroke. The Town provided copies of its Capital Improvement Plan which shows that partial funding has been committed through 2021. Since the complete funding has not been established, the decision was made not to include the project as a cost feasible project through communication with the Town of Miami Lakes staff.**

## Stillings, Noel (RER)

---

**From:** Silva, Eric B. <ebsilva@miramarfl.gov>  
**Sent:** Monday, October 24, 2016 9:40 AM  
**To:** 'Charlotte Davidson'  
**Cc:** Vempala, Bissy; Stillings, Noel (RER); Zuniga, Salvador E.  
**Subject:** RE: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications  
**Attachments:** DevActivity\_Oct16.pdf

Charlotte,

Attached is more information on approved projects.

Let me know if you have any questions.

Eric

Eric Silva, AICP  
Director | Community & Economic Development Department City of Miramar | 2200 Civic Center Place  
O: 954.602.3274 | F: 954.602.3776 | ebsilva@miramarfl.gov  
Hours: M - Th., 7am - 6pm, F - Closed | [www.miramarfl.gov](http://www.miramarfl.gov) It's Right Here In Miramar. And So Are You!

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-----Original Message-----

From: Charlotte Davidson [mailto:cnd@lce-fl.com]  
Sent: Thursday, September 29, 2016 1:47 PM  
To: Silva, Eric B.  
Cc: Vempala, Bissy  
Subject: RE: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications

Eric,

I appreciate you clarifying. We will not include it as an improvement in our analyses for neither 2020 nor 2040.

Thanks,  
Charlotte

-----  
Charlotte N. Davidson, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Telephone: (407) 281-8100, ext. 205  
Facsimile: (407) 249-2212  
E-mail: CND@lce-fl.com  
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-----Original Message-----

From: Silva, Eric B. [mailto:ebsilva@miramarfl.gov]  
Sent: Thursday, September 29, 2016 1:26 PM  
To: 'Charlotte Davidson'; Vempala, Bissy  
Subject: RE: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications

Charlotte,

The improvement cannot be added to the list. It is not fully funded. The entire cost is around \$30 million.

Eric

-----Original Message-----

From: Charlotte Davidson [mailto:cnd@lce-fl.com]  
Sent: Wednesday, September 28, 2016 9:11 AM  
To: Vempala, Bissy; Silva, Eric B.  
Subject: RE: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications

Eric and Bissy,

Thank you for following up on the Miramar Parkway Extension project. With construction listed in your CIP through year 2021, we will add it as a 2021-2040 roadway improvement project.

Much appreciated,  
Charlotte

-----  
Charlotte N. Davidson, P.E.  
LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Telephone: (407) 281-8100, ext. 205

Facsimile: (407) 249-2212

E-mail: CND@lce-fl.com

---

-----Original Message-----

From: Vempala, Bissy [mailto:bjvempala@miramarfl.gov]

Sent: Wednesday, September 28, 2016 7:37 AM

To: Silva, Eric B.; 'Charlotte Davidson'

Subject: RE: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications

Attached please find our CIP sheet for the Miramar Parkway Extension to US 27, approved by the City Commission.

-----Original Message-----

From: Silva, Eric B.

Sent: Tuesday, September 27, 2016 7:05 PM

To: 'Charlotte Davidson'

Cc: Vempala, Bissy

Subject: RE: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications

Charlotte,

The improvement is not programmed until 2031.

Eric

-----Original Message-----

From: Charlotte Davidson [mailto:cnd@lce-fl.com]

Sent: Thursday, September 22, 2016 2:24 PM

To: Silva, Eric B.

Subject: RE: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications

Eric,

We have reviewed the Broward adopted TIP and do not see the Miramar Parkway Extension (Comment No. 3 from your September 12, 2016 email). Also, the project does not appear to be included in the Miramar's current Capital Improvement Program. If we are to add the project for the purposes of the ADM and the Graham CDMP TIA analyses, we need formal documentation that it is funded in an approved plan. Do you have any information that you can share with us in order for us to add it? I may have missed the project when reviewing the various plans or perhaps there is a draft version of the CIP that you are comfortable sharing with us.

Much appreciated,

Charlotte

---

Charlotte N. Davidson, P.E.



LEFTWICH CONSULTING ENGINEERS, INC.  
12151 Science Drive, Suite 101  
Orlando, Florida 32826  
Telephone: (407) 281-8100, ext. 205  
Facsimile: (407) 249-2212  
E-mail: CND@lce-fl.com  
-----

-----Original Message-----

From: Silva, Eric B. [mailto:ebsilva@miramarfl.gov]  
Sent: Monday, September 12, 2016 4:41 PM  
To: 'Mark R. Woerner (mwoerner@miamidade.gov)'  
Cc: Gunn, Kathleen; Moore, J. Michael; Millan, Luisa M.; Vempala, Bissy; Zuniga, Salvador E.; 'JSESODIA@broward.org'; 'StuartG@browardmpo.org'; 'NVS@miamidade.gov'; Goldstein, Matthue; Stillings, Noel (RER) (stillin@miamidade.gov); 'CND@LCE-FL.COM'  
Subject: Miramar Comments on American Dream Mall and Graham Properties CDMP Amendment Applications

Mark,

Please find attached the City's comments on the American Dream Mall and Graham Properties CDMP amendment applications.

Let me know if you have any questions.

Eric

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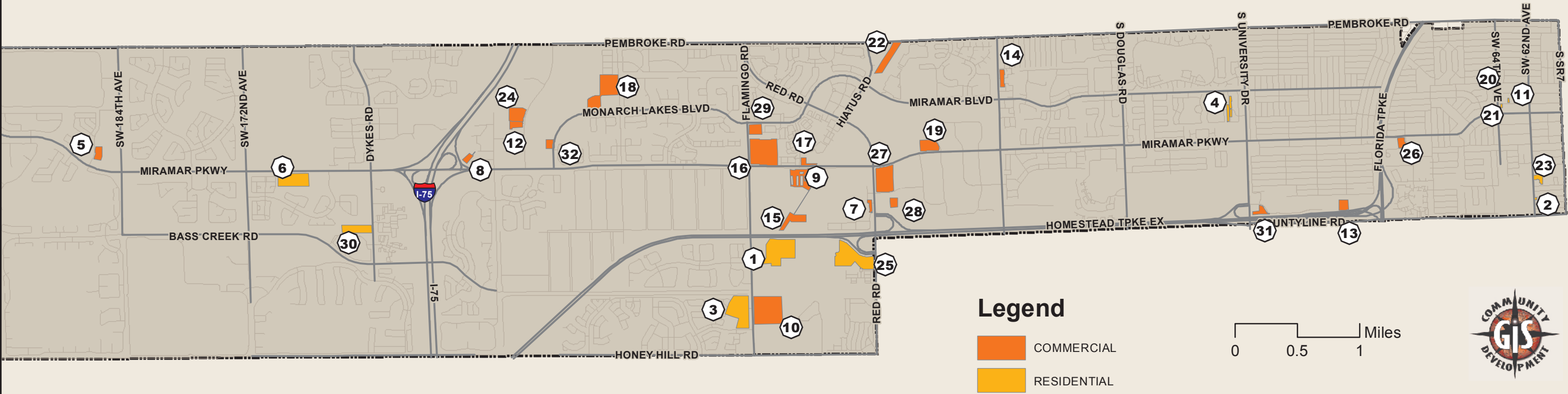
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Eric Silva, AICP  
Director | Community & Economic Development Department City of Miramar |  
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Hours: M - Th., 7am - 6pm, F - Closed | [www.miramarfl.gov](http://www.miramarfl.gov) It's Right Here In Miramar. And So Are You!

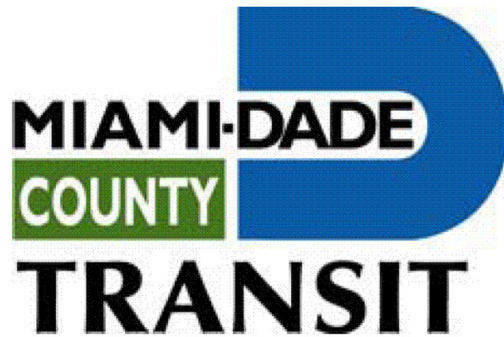
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# Development Activity as of October 2016



ID	Project Name	Status	ID	Project Name	Status	ID	Project Name	Status
1	Atlantic Commons	UNDER CONSTRUCTION	12	Holiday Inn Express	DRC PROCESS	23	Positano Villas	DRC PROCESS
2	Bella Michelle TOC	DRC PROCESS	13	MegaCenter	PERMITTING	24	Progressive	PERMITTING
3	Boardwalk Apartments	DRC APPROVAL	14	Mirabella Commercial	PERMITTING	25	Red Commons Apartments	DRC APPROVAL
4	Calabria	UNDER CONSTRUCTION	15	Miramar Business Center - Bldg D	DRC APPROVAL	26	Shirley Branca Park Band Shell	UNDER CONSTRUCTION
5	Calvary Fellowship Church Phase II	DRC PROCESS	16	Miramar Central Plaza	DRC APPROVAL	27	Space Coast Credit Union	PERMITTING
6	Casa Sant'Angelo Senior Housing	PERMITTING	17	Miramar FS 107	DRC APPROVAL	28	SpringHill Suites	PERMITTING
7	Dunkin Donuts	PERMITTING	18	Monarch Lakes Park	DRC APPROVAL	29	The Grove	DRC APPROVAL
8	Extra Space Storage - WEST	DRC PROCESS	19	MPC 30	DRC APPROVAL	30	Toledo Isles	DRC APPROVAL
9	Flamingo Self Storage II	DRC APPROVAL	20	Najibe Gardens (TOC)	DRC APPROVAL	31	Tower Com Tower	PERMITTING
10	Florida National Traning Facility	UNDER CONSTRUCTION	21	Palms at Miramar	PERMITTING	32	United Data Technologies (UDT)	DRC APPROVAL
11	Hatfield Townhomes	DRC APPROVAL	22	Park-n-Ride	DRC PROCESS			



## **TRANSIT IMPACT REPORT**

### **MAY 2016 STANDARD APPLICATIONS 5, 6 AND 7 TO AMEND THE COMPREHENSIVE DEVELOPMENT MASTER PLAN (CDMP)**

This report analyzes the impact of proposed changes to the Miami-Dade County Comprehensive Development Master Plan as they apply to transit services.

Data and information were updated as of December 2015. Financial information is current to the proposed start of fiscal year 2016-2017, as presented in the final 2016 Transit Development Plan (TDP).

Prepared by:

Department of Transportation and Public Works (DTPW)

Planning and Development

November 2016

Revision No. 7

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## **APPLICATION #5: INTERNATIONAL ATLANTIC, LLC (AMERICAN DREAM MIAMI)**

Project Location: East of the HEFT and west of I-75 between NW 170 Street and the intersection of I-75 and HEFT

Size of Property:  $\pm$ 194.48 Gross Acres /  $\pm$ 169.77 Net Acres

### Requested Amendments:

1. Re-designate the application site on the Land Use Map:

From: "Industrial and Office"

To: "Business and Office"

2. Delete the 0.45 Floor Area Ratio (FAR) limitation on 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 land within 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).

### Existing Transit Service:

There is no direct transit service in the immediate vicinity of the application site. The closest transit service is provided by Metrobus Routes 54, 183 and 267 (Ludlam Limited) at the intersection of NW 186 Street (Miami Gardens Drive) and NW 87 Avenue. It should be noted that said bus routes are located over one half mile (0.7 mile) to the east of Application No. 5 and are not accessible from the site due to the alignment of I-75 which acts as a physical barrier between the subject site and the existing transit network. Additional Metrobus Routes in the general vicinity of the site (all over one-mile away) include Routes 73, 95 (Golden Glades), 99, 183 and 286 (North Pointe Circulator). Table 1-1 indicates the existing service frequencies for existing bus routes in the area.



**Table 1-1**  
**Metrobus Route Service Summary**  
**May 2016 CDMP Amendment Application #5**

Route(s)	Service Headways (in minutes)						Proximity to Bus Stop (miles)	Proximity to Bus Route (miles)	Type of Service
	Peak (AM/PM)	Off-Peak (middays)	Evenings (after 8pm)	Overnight	Saturday	Sunday			
54	50	60	n/a	n/a	n/a	n/a	0.77	0.74	L
73	30	40	60	n/a	60	60	2.1	2.1	L
95 Golden Glades	35	n/a	n/a	n/a	n/a	n/a	2.1	2.1	E
99	60	60	60	n/a	40	40	2.1	2.1	L
183	24	40	50	n/a	40	48	0.77	0.74	L
267 Ludlam Limited	24	n/a	n/a	n/a	n/a	n/a	0.77	0.74	F/E
286 North Pointe Circulator	48	48	n/a	n/a	48	n/a	2.1	2.1	L

*Notes: L means Metrobus local route service  
F means Metrobus feeder service to Metrorail  
E means Express or Limited-Stop Metrobus service*

*Sources: Metrobus Route Headways, December 2015 as presented in Appendix A2 of the Draft 2016 Transit Development Plan (TDP)*

### Transit Concurrency Level of Service Analysis:

Policy MT-1A of the Comprehensive Development Master Plan (CDMP) Mass Transit Subelement provides that the minimum peak-hour mass transit level-of-service shall be that all areas within the Urban Development Boundary (UDB) of the Land Use Plan (LUP) which have a combined resident and work force population of more than 10,000 persons per square mile shall be provided with public transit service having 30-minute headways and an average route spacing of one mile provided that:

- 1) The average combined population and employment density along the corridor between the existing transit network and the area of expansion exceeds 4,000 per square mile, and the corridor is 0.5 miles on either side of any necessary new routes or route extensions to the area of expansion;
- 2) It is estimated that there is sufficient demand to warrant the service;
- 3) The service is economically feasible; and
- 4) The expansion of transit service into new areas is not provided at the detriment of existing or planned services in higher density areas with greater need.

The subject site is not connected to the existing transit network and is located over one half mile to the west of the existing transit network (see Figure 1). The combined employment and resident population of the proposed development is 14,800 (within the 0.30 sq. mile application site), which

exceeds the 10,000 combined employment and resident population per sq. mile threshold stipulated in Policy MT-1A. The applicant has not proffered any public transit improvements; therefore, Application No. 5 does not meet the Transit Level of Service Standard.

#### Transit Impacts:

The proposed development would have fiscal impacts on the existing bus operations and would necessitate extension of 5 existing Metrobus routes to serve the application site. The extension of 5 existing Metrobus routes results in an additional \$3,153,000 in recurring annual operations and maintenance costs. Moreover, the extension of existing Metrobus routes necessitates purchase of additional buses (8 buses total; \$3,600,000) in order to maintain existing service levels and achieve the extension of the routes. Table 1-2 lists capital as well as operations and maintenance cost estimates associated with extending existing Metrobus routes to serve the application site. Extension of the five Metrobus routes is warranted due to the fact that the average combined population and employment density along the corridor between the existing transit network and the area of expansion exceeds 4,000 per square mile. Thus, the population and employment densities generated by this application warrant a direct connection between the proposed mall development and the existing transit network. Notwithstanding the foregoing, the five route extensions are not financially feasible at this time since no available funding source has been identified to cover the estimated capital and operating and maintenance costs associated with these route extensions. Moreover, the applicant has not proffered any public transit improvements; therefore Application No. 5 does not meet the adopted Transit Level of Service Standard as stipulated in Policy MT-1A.

<b>Table 1-2 **</b>			
<b>Annual Cost of Existing Metrobus Route Extensions: Application No. 5 - American Dream Miami</b>			
Route	Annual Operations and Maintenance Cost of Route Extensions	Additional Buses Required	Capital Cost of Additional Buses Required*
Route 54	\$535,000	1	\$450,000
Route 73	\$714,000	2	\$900,000
Route 95	\$214,000	1	\$450,000
Route 99	\$832,000	1	\$450,000
Route 183	\$858,000	3	\$1,350,000
<b>TOTAL:</b>	<b>\$3,153,000</b>	<b>8</b>	<b>\$3,600,000</b>
*Cost assumes purchase of 40 foot-standard diesel buses			
**Information presented is calculated based on existing cost factors and assumes existing transit service levels will be maintained			
Source : Department of Transportation and Pubic Works, Service Planning and Scheduling Division, January 2016			

#### Transit Mitigation:

DTPW recognizes that FDOT has funded the I-75 Park-and-Ride Lot which is to be constructed on FDOT-owned property (Folio# 30-2004-000-0042) located north of the mall site across NW 186 Street. However, DPTW notes that the I-75 Park-and-Ride Lot (American Dream Station-North) is intended to serve commuters wishing to access express transit services and will not

adequately meet the needs of transit patrons wishing to access the mall site. In addition, DTPW has identified a need to incorporate a bus operator comfort station into the design of the I-75 Park-and-Ride Lot (American Dream Station – North). Funding to extend the water and sewer lines to the park-and-ride site have not yet been identified. As such, DTPW requests that should this application be approved, the applicant construct the necessary water and sewer line extensions and connections needed to provide water and sewer service to the FDOT I-75 Park-and-Ride Lot (American Dream Station – North).

Although the Transportation Impact Analysis states that the applicant is planning to incorporate a transit center within the parking system (similar to the one in Bloomington, Minnesota's Mall of America) along with having the FDOT I-75 Park-and-Ride lot just off the exit ramps from I-75/HEFT, the applicant has not formalized their commitment to construct said transit center (American Dream Station - South). Moreover the applicant has not provided any details regarding the proposed transit center as it relates to location of the transit center within the mall site. In the event, this application is approved, detailed site plans as well as a mechanism to provide funding to cover the operation and maintenance costs associated with the transit center (American Dream Station - South) must be provided by the applicant for DTPW's review as part of the site plan approval process.

The mitigation analysis submitted by the applicant states that mitigation measures will include "a range of options" but does not specifically refer to multimodal strategies. DTPW recommends that the applicant work closely with this agency to fund potential express bus services on the I-75, Homestead Extension of Florida's Turnpike (HEFT), and SR 826 express lanes, a transit center (American Dream Station - South) within the mall site as well as extension of existing Metrobus Routes 54, 73, 95, 99 and 183 connecting the site to the residential areas on the east side of I-75.

#### Future Conditions for the Immediate Area:

##### *Funded Transit Improvements*

The American Dream Miami project is a unique attraction and upon construction will be the largest self-contained shopping/entertainment experience in the United States. With a development of such magnitude, careful consideration should be given to planning of future transit service to connect the site to the County's existing transit network as a means of mitigating traffic impacts associated with future development of the site.

The 2016 Transportation Improvement Program (TIP) does not list any transit improvement projects within the immediate vicinity of the site.

The 2016 Transit Development Plan (TDP) - Ten Year Implementation Plan does not list any funded transit improvement projects within the immediate vicinity of the site.

The 2040 Long Range Transportation (LRTP) - Cost Feasible Plan does not list any transit improvement projects within the immediate vicinity of the site.

Florida Department of Transportation's (FDOT's) I-75 Multi-Modal Master Plan, from SR 826/Gratigny Parkway to I-595/Sawgrass Expressway which was completed in 2006 and revaluated in 2013, recommended a park-and-ride lot at the I-75/Miami Gardens Drive Interchange. The I-75 Park-and-Ride Lot (American Dream Station - North) is currently in the design phase of development and will include approximately 350 parking spaces to support new express bus service connections. The I-75 Park-and-Ride Lot (American Dream Station - North) is to be constructed on FDOT-owned property (Folio# 30-2004-000-0042) which is located north of the mall site. The I-75 Park-and-Ride Lot (American Dream Station - North) is funded by FDOT as part of the I-75 PD&E Study which includes the portion of I-75 from the Miami/Dade Broward Countyline to SR 826/Palmetto Expressway. (See attached FDOT Work Program Screen FM#420669-1). FDOT has included the I-75 Park-and-Ride Lot (American Dream Station - North) as a stand-alone project as part of the 2016-2021 Adopted Five-Year Work Program. Table 1-3 lists the project completion date and project costs associated with the I-75 Park-and-Ride Lot (American Dream Station - North).

**Table 1-3**  
**FDOT I-75 Park-and-Ride Lot Project (American Dream Station – North)**  
**May 2016 CDMP Amendment Application #5**

Route/Transit Center	Improvement Description	Implementation Year	Annual Operational Cost	Capital Cost
I-75 Park-and-Ride Lot (American Dream Station - North)	Construct new park-and-ride facility with approximately 350 parking spaces to support new express bus service connection.	Late 2018	\$100,000*	\$5,000,000 (Approximately)

*\*It is anticipated that DPTW will enter into a Memorandum of Agreement with FDOT for the operation and maintenance of this facility. Funding for operation and maintenance of the station is in the process of being identified.*

#### *Unfunded Transit Improvements (Vision Projects)*

DTPW's 2016 TDP annual update serves as the agency's strategic planning guide for public transportation in Miami-Dade County over the course of the next ten years. It is important to note that the projects listed in Table 1-4 are currently unfunded, were not considered in the Transit Concurrency Level of Service Analysis, and are provided in order to illustrate various transit mobility options to serve mall site.

**Table 1-4**  
**Unfunded Transit Improvements (Vision Projects)**  
**May 2016 CDMP Amendment Application #5**

Route/Transit Center	Improvement Description	Implementation Year	Annual Operational Cost	Capital Cost
American Dream – MIC Express	Express bus service from American	TBD	\$4,692,000	\$15,200,000 – 16 Standard

	Dream Stations to MIC			(40') buses required
I-75/Gratigny Express	Express bus service from American Dream Stations to Miami-Dade College North Campus (Sharks North Station)	TBD	\$2,639,000	\$8,550,000 – 9 Standard (40') buses required
NW Miami-Dade Express**	Route will provide express bus service from the American Dream Stations to the Palmetto Metrorail Station. Headways will be 10 minutes during peak hours.	TBD	\$1,458,000	*TBD – 8 Buses required
Florida Turnpike Express (North)	Route will provide express bus service from the FIU Panther Station to the American Dream Stations. This route will operate all day with 20 minute headways.	TBD	\$2,220,826	*TBD – 4 Buses required
Okeechobee Link	Proposed rail project providing a premium transit connection between the MIC and American Dream Miami Project (as proposed in the South Florida Regional Transportation Authority (SFRTA) Miami-Dade County Rail Opportunities Report, April 2015)	TBD	TBD	\$325,000,000
American Dream South Station	Construct Transit Center within American Dream Mall site with bus bays, passenger waiting areas, bus operator comfort station, ticket vending and other associated transit amenities.	TBD	\$30,000	\$2,000,000

\*Bus model to be determined; Spare bus ratio is 20%



*\*\* In April 2016, the MPO Governing Board adopted Resolution Number 26-16 endorsing the Strategic Miami Area Rapid Transit (SMART) Plan and directing the MPO Executive Director to Work with the MPO Fiscal Priorities Committee to determine the costs and potential sources of funding for project development and environment study for six priority corridors as well as a Bus Express Rapid Transit (BERT) Network).*

Based on the CDMP threshold for traffic and/or transit service objectives within a ½ mile distance; the estimated operating and capital costs of the proposed new express bus routes and new transit center facility are associated with this application.

DTPW Response to Updated Traffic Impact Analysis dated October 10, 2016:

DTPW acknowledges that the applicant has stated in their updated Traffic Impact Analysis (TIA) that the proposed mall will be operating 20 shuttle-type buses to provide direct connections to the mall site from “tourist origins and destinations” such as Fort Lauderdale-Hollywood International Airport, Port Everglades Seaport, Miami International Airport, and Port Miami Seaport as well as connections to the nearby park-and-ride facility (American Dream Station – North) and the Graham Project Site (Application No. 6). As stated in the TIA, these shuttle services are to be provided by the applicant “based on ridership potential.” DTPW acknowledges that should the 20 shuttle buses operate at full capacity (assuming 40 passengers per vehicle), this private shuttle service could carry approximately 800 passengers daily.

While many large malls within Miami-Dade County offer similar private shuttle-type bus services from key tourist origins to the malls in order to provide direct one-seat rides for potential shoppers, most if not all major malls within the County are also connected to the public transit network. The applicant’s TIA states that “The ADM services will serve exclusively travelers with one origin or destination point at the ADM Site...” As previously mentioned, the mall site is currently not connected to the County’s transit network and given the projected population and employment densities created by this project, the subject site does not meet the County’s Mass Transit Level of Service Standard as provided in Policy MT-1A of the County’s Comprehensive Development Master Plan (CDMP) – Mass Transit Subelement. The Transportation Element of the CDMP includes overarching goals, objectives and policies that express the County’s intent to develop multi-modalism, reduce the County’s dependency on the personal automobile, enhance energy saving practices in all transportation sectors, and improve coordination between land use and transportation planning and policies.

While the provision of private shuttle-type buses offers an alternative to the use of the personal automobile, this alternative only serves the needs of visitors and tourists wishing to travel to the mall from specific regional airports and seaports. Given the lack of funds to extend existing Metrobus Routes and/or implement new express bus routes to serve the mall as well as lack of funds to purchase additional vehicles needed to implement the proposed route extensions and new express routes, the only viable travel option for residents and future mall employees would be the personal automobile. Moreover, the TIA emphasizes that the provision of the proposed shuttle routes is contingent upon potential ridership. Thus, the proposed shuttles could be discontinued by the applicant at any time. The TIA also mentions a “multi-modal transit station” to be located “directly within the mall area.” However, no specific information is provided in the

TIA with regards to size of station (acreage/square feet), number of bus bays to be provided or passenger amenities, etc.

It should be emphasized that the applicant has not proffered a declaration of restrictions formalizing their commitment to any of the transit improvements mentioned in the updated TIA or those recommended in this report. It should be noted that Objective CIE-5 of the Capital Improvement Element of the CDMP states that development approvals will strictly adhere to all adopted growth management and land development regulations and will include specific reference to the means by which public facilities and infrastructure will be provided. DTPW looks forward to continued collaboration with the applicant to fund viable public transit projects that fully integrate the mall property with the County's transit network and meet the travel needs of all County residents wishing to access the mall.

#### **APPLICATION #6: THE GRAHAM PROPERTIES**

Project Location: East of the HEFT and west of I-75 between NW 170 and NW 180 Streets

Size of Property: ±339 Gross Acres/±323.6 Net Acres

Requested Amendments:

1. Re-designate the application site on the Land Use Map:  
  
From: Parcel A: "Industrial and Office" (329 acres) and  
  
Parcel B: "Business and Office" (10 acres)  
  
To: "Business and Office" and "Employment Center"
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

#### **Existing Transit Service**

There is no direct transit service in the immediate vicinity of the application site. The closest transit service is provided by Metrobus Route 54 at the intersection of NW 170 Street and NW 82 Avenue and is located over one mile to the east of the application site. Table 2-1 indicates the existing service frequency for Route 54 as well as other routes that could potentially be extended to serve the application site.

Municipal transit service is provided by the Miami Lakes Moover which operates along a segment of NW 170 Street just east of NW 87 Avenue and is located approximately 0.87 miles from the application site (1.21 miles to the nearest stop). The Miami Lakes Moover operates Monday through Friday during peak morning (6:00-10:00AM) and peak evening (2:15-7:00PM) travel periods circulating every 35-40 minutes.

**Table 2-1**  
**Metrobus Route Service Summary**  
**May 2016 CDMP Amendment Application #6**

Route(s)	Service Headways (in minutes)						Proximity to Bus Stop (miles)	Proximity to Bus Route (miles)	Type of Service
	Peak (AM/PM)	Off-Peak (middays)	Evenings (after 8pm)	Overnight	Saturday	Sunday			
54	50	60	n/a	n/a	n/a	n/a	0.77	0.74	L
73	30	40	60	n/a	60	60	2.1	2.1	L
95 Golden Glades	35	n/a	n/a	n/a	n/a	n/a	2.1	2.1	E
99	60	60	60	n/a	40	40	2.1	2.1	L
183	24	40	50	n/a	40	48	0.77	0.74	L
267 Ludlam Limited	24	n/a	n/a	n/a	n/a	n/a	0.77	0.74	F/E
286 North Pointe Circulator	48	48	n/a	n/a	48	n/a	2.1	2.1	L

*Notes: L means Metrobus local route service  
F means Metrobus feeder service to Metrorail  
E means Express or Limited-Stop Metrobus service*

*Sources: Metrobus Route Headways, December 2015 as presented in Appendix A2 of the Draft 2016 Transit Development Plan (TDP)*

### Transit Concurrency Level of Service Analysis:

Policy MT-1A of the Comprehensive Development Master Plan (CDMP) Mass Transit Subelement provides that the minimum peak-hour mass transit level-of-service shall be that all areas within the Urban Development Boundary (UDB) of the Land Use Plan (LUP) which have a combined resident and work force population of more than 10,000 persons per square mile shall be provided with public transit service having 30-minute headways and an average route spacing of one mile provided that:

- 1) The average combined population and employment density along the corridor between the existing transit network and the area of expansion exceeds 4,000 per square mile, and the corridor is 0.5 miles on either side of any necessary new routes or route extensions to the area of expansion;
- 2) It is estimated that there is sufficient demand to warrant the service;
- 3) The service is economically feasible; and
- 4) The expansion of transit service into new areas is not provided at the detriment of existing or planned services in higher density areas with greater need.

The subject site is not connected to the existing transit network and is located over one half mile to the west of the existing transit network. The combined employment and resident population of the proposed development is 17,533 (within the 0.53 sq. mile application site), which exceeds the 10,000 combined employment and resident population per sq. mile threshold stipulated in Policy

MT-1A. The applicant has not proffered any transit improvements; therefore, Application No. 6 does not meet the Transit Level of Service Standard.

#### Transit Impacts:

The proposed development would have fiscal impacts on the existing bus operations and would necessitate extension of 5 existing Metrobus routes to serve the application site. The extension of 5 existing Metrobus routes results in an additional \$3,153,000 in recurring annual operations and maintenance costs. Moreover, the extension of existing Metrobus routes necessitates purchase of additional buses (8 buses total; \$3,600,000) in order to maintain existing service levels and achieve the extension of the routes. Table 2-2 lists capital as well as operations and maintenance cost estimates associated with extending existing Metrobus routes to serve the application site. Extension of the five Metrobus routes is warranted due to the fact that the average combined population and employment density along the corridor between the existing transit network and the area of expansion exceeds 4,000 per square mile. Thus, the population and employment densities generated by this application warrant a direct connection between the proposed development and the existing transit network. Notwithstanding the foregoing, the five route extensions are not financially feasible at this time since no available funding source has been identified to cover the estimated capital and operating and maintenance costs associated with these route extensions. Moreover, the applicant has not proffered any transit improvements; therefore Application No. 6 does not meet the adopted Transit Level of Service Standard as stipulated in Policy MT-1A.

<b>Table 2-2 **</b>			
<b>Annual Cost of Existing Metrobus Route Extensions: Application No. 6 - Graham Properties</b>			
Route	Annual Operations and Maintenance Cost of Route Extensions	Additional Buses Required	Capital Cost of Additional Buses Required*
Route 54	\$535,000	1	\$450,000
Route 73	\$714,000	2	\$900,000
Route 95	\$214,000	1	\$450,000
Route 99	\$832,000	1	\$450,000
Route 183	\$858,000	3	\$1,350,000
<b>TOTAL:</b>	<b>\$3,153,000</b>	<b>8</b>	<b>\$3,600,000</b>

\*Cost assumes purchase of 40 foot-standard diesel buses

\*\*Information presented is calculated based on existing cost factors and assumes existing transit service levels will be maintained

Source : Department of Transportation and Public Works, Service Planning and Scheduling Division, January 2016

#### Transit Mitigation:

DTPW recognizes that FDOT has funded the I-75 Park-and-Ride Lot (American Dream Station - North) which is to be constructed on FDOT-owned property (Folio# 30-2004-000-0042) located north of the mall site (Application No. 5) across NW 186 Street. However, DPTW notes that the I-75 Park-and-Ride Lot (American Dream Station - North) is intended to serve commuters wishing to access express transit services and is located approximately 1 mile north of Application No. 6.

Therefore, DTPW recommends that the applicant work closely with this agency to fund potential express bus services on the I-75, Homestead Extension of Florida's Turnpike (HEFT), and SR 826 express lanes as well as extension of existing Metrobus Routes 54, 73, 95, 99 and 183 connecting the site to the residential areas on the east side of I-75.

Future Conditions for the Immediate Area:

*Funded Transit Improvements*

Application No. 6 encompasses a large tract of land (339 Gross Acres) and if approved will consist of a combination of residential, retail, office and industrial uses. Application No. 5 (American Dream Miami) project will be the largest self-contained shopping/entertainment experience in the United States and will be located immediately north of Application No. 6. With two developments of such magnitude located in such close proximity to one another, careful consideration should be given to planning of future transit service to connect both sites to the County's existing transit network as a means of mitigating traffic impacts associated with future development of both sites.

The 2016 Transportation Improvement Program (TIP) does not list any transit improvement projects within the immediate vicinity of the site.

The draft 2016 Transit Development Plan (TDP) - Ten Year Implementation Plan does not list any funded transit improvement projects within the immediate vicinity of the site.

The 2040 Long Range Transportation (LRTP) - Cost Feasible Plan does not list any transit improvement projects within the immediate vicinity of the site.

**Table 2-3**  
**Unfunded Transit Improvements (Vision Projects)**  
**May 2016 CDMP Amendment Application #6**

<b>Route/Transit Center</b>	<b>Improvement Description</b>	<b>Implementation Year</b>	<b>Annual Operational Cost</b>	<b>Capital Cost</b>
American Dream – MIC Express	Express bus service from American Dream Stations to MIC	TBD	\$4,692,000	\$15,200,000 – 16 Standard (40') buses required
I-75/Gratigny Express	Express bus service from American Dream Stations to Miami-Dade College North Campus (Sharks North Station)	TBD	\$2,639,000	\$8,550,000 – 9 Standard (40') buses required
NW Miami-Dade Express**	Route will provide express bus service from the American Dream Stations to the Palmetto Metrorail Station. Headways will be 10	TBD	\$1,458,000	*TBD – 8 Buses required



	minutes during peak hours.			
Florida Turnpike Express (North)**	Route will provide express bus service from the FIU Panther Station to the American Dream Stations. This route will operate all day with 20 minute headways.	TBD	\$2,220,826	*TBD – 4 Buses required
Okeechobee Link	Proposed rail project providing a premium transit connection between the MIC and American Dream Miami Project (as proposed in the South Florida Regional Transportation Authority (SFRTA) Miami-Dade County Rail Opportunities Report, April 2015)	TBD	TBD	\$325,000,000
American Dream South Station	Construct Transit Center within American Dream Mall site with bus bays, passenger waiting areas, bus operator comfort station, ticket vending and other associated transit amenities.	TBD	\$30,000	\$2,000,000

\*Bus model to be determined; Spare bus ratio is 20%

\*\* In April 2016, the MPO Governing Board adopted Resolution Number 26-16 endorsing the Strategic Miami Area Rapid Transit (SMART) Plan and directing the MPO Executive Director to Work with the MPO Fiscal Priorities Committee to determine the costs and potential sources of funding for project development and environment study for six priority corridors as well as a Bus Express Rapid Transit (BERT) Network).

Based on the CDMP threshold for traffic and/or transit service objectives within a ½ mile distance; the estimated operating and capital costs of the proposed new express bus routes and new park-and-ride facility are associated with this application.

#### DTPW Response to Updated Traffic Impact Analysis dated October 10, 2016:

DTPW acknowledges that the applicant has stated in their updated Traffic Impact Analysis (TIA) that the applicant will “construct or cause to be constructed a northbound and southbound Transit Stop with Shelters to be located along NW 102 Avenue.”

As previously mentioned, the application site is currently not connected to the County's transit network and given the projected population and employment densities created by this project, the subject site does not meet the County's Mass Transit Level of Service Standard as provided in Policy MT-1A of the County's Comprehensive Development Master Plan (CDMP) – Mass Transit Subelement. The Transportation Element of the CDMP includes overarching goals, objectives and policies that express the County's intent to develop multi-modalism, reduce the County's dependency on the personal automobile, enhance energy saving practices in all transportation sectors, and improve coordination between land use and transportation planning and policies.

While the provision of the mall's private shuttle-type buses offers an alternative to the use of the personal automobile, this alternative only serves the needs of visitors and tourists wishing to travel to the mall. It is anticipated, that future residents and employees generated by the proposed development will have other travel needs. Given the lack of funds to extend existing Metrobus Routes and/or implement new express bus routes to serve the application site as well as lack of funds to purchase additional vehicles needed to implement the proposed route extensions and new express routes, the only viable travel option for future residents living in the proposed residential development as well as future employees of the retail and business park tenants would be the personal automobile. Moreover, the TIA emphasizes that the provision of the proposed shuttle routes is contingent upon potential ridership. Thus, the proposed shuttles could be discontinued by the applicant at any time.

It should be emphasized that the applicant has not proffered a declaration of restrictions formalizing their commitment to any of the transit improvements mentioned in the updated TIA or those recommended in this report. It should be noted that Objective CIE-5 of the Capital Improvement Element of the CDMP states that development approvals will strictly adhere to all adopted growth management and land development regulations and will include specific reference to the means by which public facilities and infrastructure will be provided. DTPW looks forward to continued collaboration with the applicant to fund viable public transit projects that fully integrate the proposed residential, retail and business park project with the County's transit network.

## **APPLICATION NO. 7: KENDALL ASSOCIATES I, LLLP**

Project Location: 9400 SW 130 Avenue

Size of Property: 168.13 +/- acres

Requested Amendments:

1. Redesignation of the property from "Parks and Recreation" to "Low-Medium Density Residential (6-13 dwelling units per gross acre)"
2. A text amendment is requested on page I-52, "Parks and Recreation" in the Land Use Element of the CDMP

3. Release of the Declaration of Restrictions recorded in Official Records Book 5891 at Page 633 of the Public Records of Miami-Dade County, Florida
4. Acceptance of the applicant's proffered Declaration of Restrictions limiting density of the Property to a maximum of 8 dwelling units per acre

**Existing Service:**

The area surrounding Application No. 7 is served by Metrobus Routes 88, 104, 137 and 288. The existing service frequencies are provided in Table 7-1.

**Table 7-1**  
**Metrobus Route Service Summary**  
**May 2016 Amendment Application No. 7**

Route(s)	Service Headways (in minutes)						Proximity to Bus Stop (miles)	Proximity to Bus Route (miles)	Type of Service
	Peak (AM/PM)	Off-Peak (middays)	Evenings (8pm)	Overnight	Saturday	Sunday			
88	20	30	30	N/A	30	30	0.18	0.18	L
137	30	45	60	N/A	40	45	0.42	0.42	L
104	24	45	60	N/A	60	60	0.23	0.23	L
288	12	N/A	N/A	N/A	N/A	N/A	0.18	0.18	F/E

Notes: L= Local Service, E=Express/Limited Stop Service, F=Feeder service to Metrorail

\*Metrobus Route Headways, December 2015 as presented in Appendix A2 of the Draft 2016 Transit Development Plan (TDP)

In February 2016, DTPW deployed Transit Signal Priority (TSP) along Kendall Drive in order to optimize bus operations along the Kendall Corridor.

**Future Conditions for the Immediate Area:**

The draft 2016 Transit Development Plan (TDP) proposes the following improvements to the Kendall Corridor.

**Table 7-2**  
**Metrobus Recommended Service Improvements**  
**May 2016 Amendment Application No. 7**

Project Name	Project Description
Kendall Park & Ride at SW 127 Avenue	Construct park-and-ride facility along SW 88 Street (Kendall Drive) and SW 127 Avenue. Project is funded and scheduled for completion in 2017.
*Kendall Corridor (Kendall BRT)	Implement full Bus Rapid Transit (BRT) with dedicated bus lanes along SW 88 Street (Kendall Drive). This project is funded for a PD&E Study only (partially funded).

\*MPO Resolution No. 31-15 amended the the TIP to delete selected Enhanced Bus Service Projects and reallocate said funds to three new projects as follows: "Implementation of Bus Rapid Transit along NW 27 Avenue, Flagler Street, and Kendall Drive Transit Corridors. MPO Resolution No. 01-15 prioritized this corridor to be evaluated in a Project Development and Environmental Study (PD&E) Study for the implementation of premium transit.

### Major Transit Projects:

#### *Kendall Corridor*

On February, 19, 2015, the Miami-Dade MPO Governing Board directed that the Kendall Corridor be implemented in an expedited manner assuming full Bus Rapid Transit (BRT) as the transit modal technology, pursuant to MPO Resolution No. 01-15. FDOT is currently in the process of selecting a consultant to study the implementation of Bus Rapid Transit (BRT) service and infrastructure along SR 94/SW 88th Street/Kendall Drive from the West Kendall Transit Terminal at SW 162nd Avenue to the Dadeland North Metrorail Station. The primary study objective is to evaluate the implementation of a cost-effective, high-ridership BRT system within the Kendall Corridor that is to be part of an overall interconnected premium transit network. It is anticipated that FDOT will select a qualified consultant by the second quarter of 2016.

In September 2015, the MPO Governing Board adopted Resolution Number 31-15, which amended the FY 2016 Transportation Improvement Program (TIP) to delete selected Enhanced Bus Service Projects and reallocate said funds to three new projects as follows: "Implementation of Bus Rapid Transit along NW 27th Avenue, Flagler Street, and Kendall Drive Transit Corridors." Therefore, the Kendall Enhanced Bus Service Project is no longer being pursued.

The Florida Department of Transportation (FDOT) has initiated a study to evaluate BRT and LRT along the Kendall Corridor with the objective of implementing a cost-effective, high-ridership rapid transit system that will be part of an overall interconnected rapid transit network. The County seeks to build upon the results of this study and pursue Federal New or Small Starts funds to ensure rapid transit connections between West Kendall and the Dadeland Area.

In February 2016, the MPO Governing Board adopted Resolution Number 06-16, unanimously approving a policy to set as highest priority the advancement of Rapid Transit Corridors and transit supportive projects in Miami-Dade County.

In April 2016, the MPO Governing Board adopted Resolution Number 26-16 endorsing the Strategic Miami Area Rapid Transit (SMART) Plan and directing the MPO Executive Director to Work with the MPO Fiscal Priorities Committee to determine the costs and potential sources of

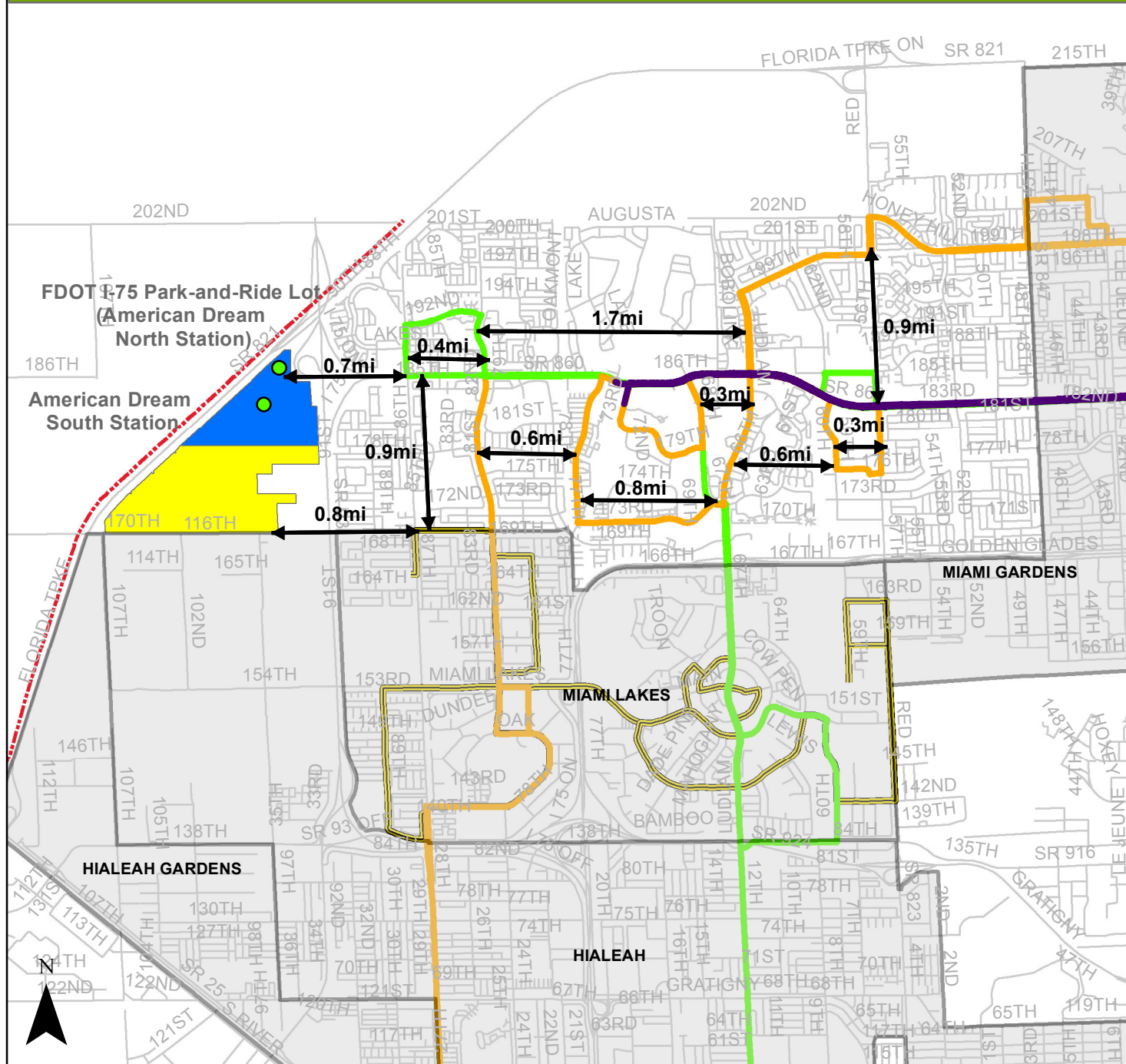
funding for project development and environment study for six priority corridors, one of which is the Kendall Corridor.

Application Impacts in the Traffic Analysis Zone:

In TAZ #1257 where Application #7 is sought, if granted, the expected transit impact produced by this application can be accommodated with the existing transit service levels.



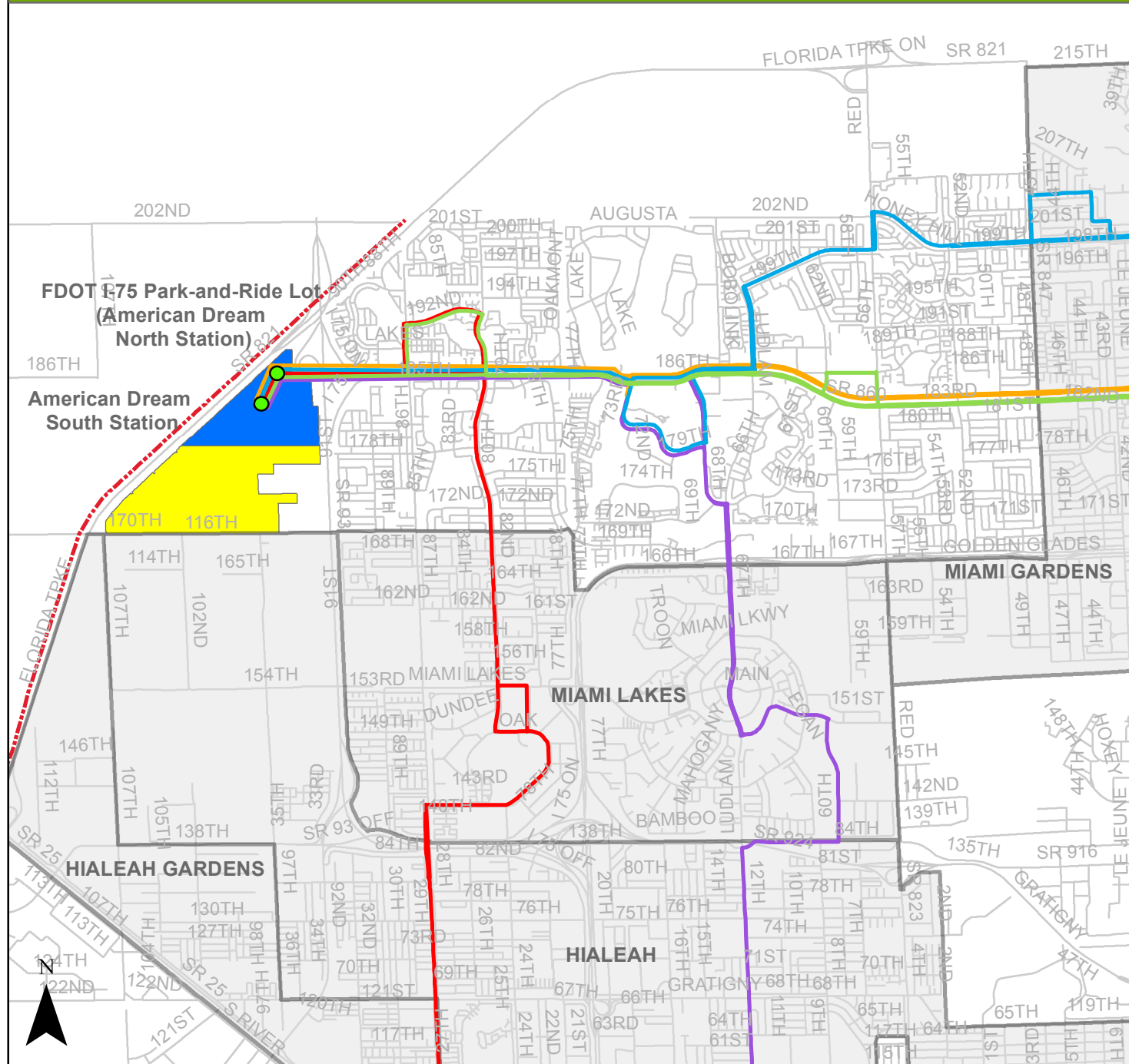
**Figure 1. November 2015 CDMP Amendment Applications No. 1 & 2**  
**Transit Concurrency Level of Service Analysis: Route Spacing and Frequency**



**Legend**

- Application No. 1 ADM
- Application No. 2 Graham
- Urban Development Boundary
- 30 min transit frequency (24 - 30 min)
- 45 min transit frequency (31 - 45 min)
- 60 min transit frequency (46 - 60 min)
- Miami Lakes Moover Municipal Route
- Municipality
- Transit Station

**Figure 2: Existing Metrobus Route Extensions  
American Dream Miami & Graham Properties**



### Legend

----- Urban Development Boundary

■ Graham Properties

■ American Dream Mall

### Municipalities

■ Municipalities

### Existing Metrobus Route Extensions

— 54

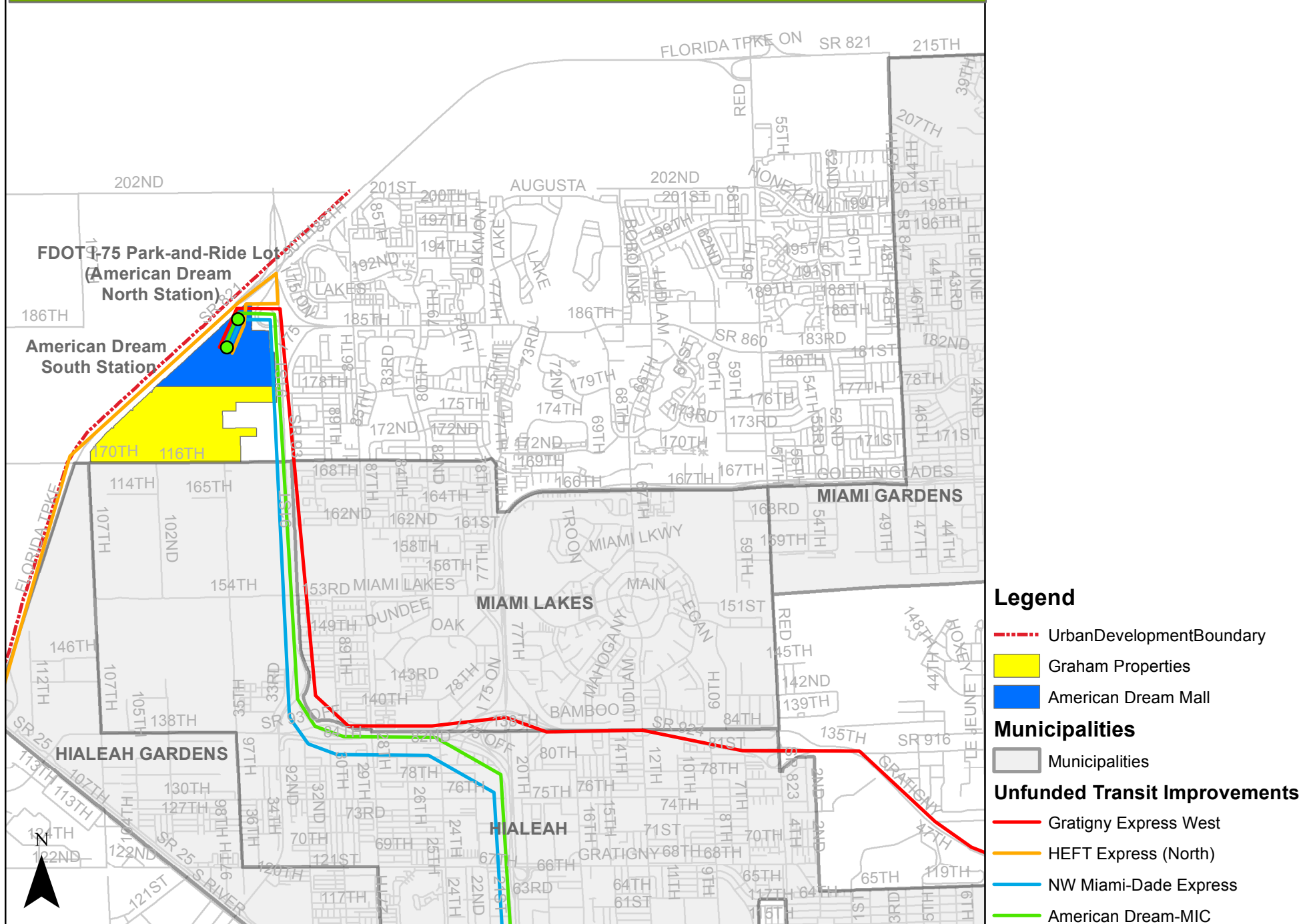
— 73

— 95 Express - Golden Glades

— 99

— 183

**Figure 3: Unfunded Transit Improvements  
American Dream Miami & Graham Properties**





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Office of Work Program and Budget Lisa Saliba - Director

## Five Year Work Program

Selection Criteria	
All in State	2017-2021 AD
(Updated: 7/22/2016-00.46.49)	Item Number:420669-1

Transportation System Description	Fiscal Year:	District	Length	Type of Work	Item
		2017	2018	2019	2020 2021
INTRASTATE INTERSTATE		District 06 - Miami-Dade County	5.442	PD&E/EMO STUDY	420669-1
SR 93/I-75 FROM MIAMI-DADE/BROWARD LINE TO SR 826/PALMETTO EXPY.					SIS
<b>Highways /PD &amp; E (On-Going)</b>			\$3,756		

This site is maintained by the Office of Work Program and Budget, located at 605 Suwannee Street, MS 21, Tallahassee, Florida 32399. For additional information please e-mail questions or comments to:  
(Lisa Saliba: [Lisa.Saliba@dot.state.fl.us](mailto:Lisa.Saliba@dot.state.fl.us) or call 850-414-4622)

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