

MEMORANDUM

Date: April 27, 2021

To: Shannon Kelley, Environmental Scientist III
Planning and Environmental Management Office, FDOT District 6

From: Marty Peate, Associate Vice President
Transportation, AECOM Technical Services, Inc.

CC: Alissa Turtleaub, Park Planning Section Supervisor, Planning and Design Excellence
Miami Dade County Parks, Recreation and Open Spaces

Subject: Financial Management Number: 444236-1-22-01
Air Quality Technical Memorandum
Ludlam Trail from SW 80th Street to 400' North of NW 7th Street
Miami-Dade County

The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by the Florida Department of Transportation (FDOT) pursuant to 23 U.S.C. § 327 and a Memorandum of Understanding dated December 14, 2016 and executed by the Federal Highway Administration (FHWA) and FDOT. This Air Quality Technical Memorandum has been prepared in accordance with Part 2, Chapter 19 – Air Quality of the FDOT Project Development and Environment (PD&E) Manual.

Miami-Dade Parks, Recreation, and Open Spaces (MDPROS) is proposing to develop a 5.6-mile multi-use trail within a former railroad corridor (i.e., the Ludlam Trail Corridor, or proposed project). The proposed project limits extend along a segment of the former rail corridor from SW 80th Street to 400 feet north of NW 7th Street, between 69th and 70th Avenue. The project study area is located within a highly developed area of Miami-Dade County. Adjacent lands along the former railway corridor are characterized by FDOT land use data as industrial, public/semi-public, recreational, residential, retail/office, vacant non-residential, and vacant residential. The purpose of the proposed Ludlam Trail Corridor Project is to encourage the use of alternate modes of transportation and enhance overall connectivity and accessibility to schools, parks, transit stations, and bus stops for as many as 30,500 residents present within two miles of the proposed project corridor. The proposed project will provide a safe, dedicated, and direct means of non-motorized transportation to and from areas of residences, work, schools, parks, transit, and shopping centers, and will serve bicyclists, pedestrians, and other non-motorized vehicle users.

Agency coordination to obtain air quality related information occurred during the Efficient Transportation Decision Making (ETDM) phase through the ETDM Programming Screen (ETDM #14369) and the Advance Notification (AN) process. The ETDM Programming Screen Summary Report was published on July 2, 2019.

During the ETDM phase, the FDOT District 6 and the Environmental Protection Agency (EPA) reviewed the project and listed a degree of effect of 'Minimal' for air quality for the Build Alternative. While no permanent effects to air quality are anticipated, potential temporary impacts to air quality could occur as a result of construction activities in the form of dust from earthwork and unpaved roads. These impacts will be minimized by adherence to applicable state regulations and to applicable FDOT Standard Specifications for Road and Bridge Construction.

The proposed project is located in Miami-Dade County which is currently designated as being in attainment for meeting the Environmental Protection Agency's National Ambient Air Quality Standards (NAAQS) for six air pollutants - ozone (O₃), nitrogen dioxide (NO₂), particulate matter [one for "coarse" particles (PM₁₀) and one for "fine" particles (PM_{2.5})], sulfur dioxide (SO₂), carbon monoxide (CO), and lead (Pb).

This project is not expected to create adverse impacts on air quality as the project area is in attainment for all National Ambient Air Quality Standards (NAAQS) under the criteria provided in the Clean Air Act. Therefore, the Clean Air Act conformity requirements do not apply to this project. Additionally, the project is expected to not change the Level of Service (LOS) and not change delay and congestion on all facilities within the study area.

A CO screening model for the project alternatives was not required as the project does not meet the following thresholds per Section 19.2.2.1, Part 2, Chapter 19 of the PD&E Manual:

1. The project is an Environmental Impact Statement (EIS) and/or;
2. The total vehicular delay time (veh-hours) at an intersection in the design year build condition is projected to increase when compared to the design year no-build condition and/or;
3. The project is expected to have community controversy regarding air quality.