

## MIAMI-DADE PLANNING AND ZONING DEPARTMENT

- 1. Comment No. 1, Page 1. Applicant's response addressed our concerns. However, it is the County's belief that the DRI boundaries and the ADA boundaries must match. Additional land for a CDMP amendment that is not included in the DRI must be filed during a twice per year amendment filing. In this case, since it is outside the UDB the application could only be made in the April cycle of every odd year. Since the applicant is reflecting that the difference in land area is merely public right-of-ways, the Department has no problem including this into the DRI. Please explain why these lands were deleted from the ADA.**

The Applicant has not included portions of the S.W. 136 Street, S.W. 177 Avenue and S.W. 152 Street rights of way in the legal description of the DRI property. Such rights of way are included, however, in the legal description of the companion Comprehensive Development Master Plan ("CDMP") application. Department of Planning and Zoning staff has expressed concern about the difference in the two legal descriptions and has suggested that the right of way segments would need to be the subject of a separate CDMP application brought in one of the County's standard filing periods if the segments are not included in the DRI legal description.

State Statute Section 380.06(6)(b) provides that "[any] local government comprehensive plan amendments related to a proposed [DRI] . . . may be initiated by a local planning agency or the developer. . . without regard to the statutory or local ordinance limits on the frequency of consideration of amendments." The statutory language clearly provides that any comprehensive plan amendment that is related to a proposed DRI may be filed and reviewed in tandem with the DRI application. The statute does not limit the eligible applications to those that happen to be located within the DRI property. For example, a CDMP amendment could be filed to re-designate a parcel to permit development of a water and sewer facility necessary to serve a DRI regardless of that parcel's location.

The suggestion that a DRI legal description must be modified to include a parcel that could be miles away from the DRI development so that it aligns with the legal description of a related CDMP amendment is not supported by the plain language of the statute.

On a practical note, the Department of Community Affairs requires a DRI applicant to provide a signed authorization from all property owners within the DRI property. In contrast, the County's CDMP regulations do not require a CDMP applicant to have secured the signed consent from all of the property owners within the application area of a CDMP amendment request. Requiring the right of way segments to be within the DRI legal description could result in a current owner of a small sliver of zoned right of way preventing the Parkland application from moving forward by declining to sign the required authorization. It is not the intent of Section 380.06(6) to subject CDMP application filing requirements to the same standards as related DRI applications.

- 2. Comment No. 2, Page 1. The growth scenario presented by the applicant is not based upon good planning methodologies. To use a 3-year period of high growth to project long-term growth is unacceptable. As can be seen from the downturned market that is currently being experienced, the continued growth seen between 2000 and 2003 is unlikely. For this reason the Department and the State use more historic growth rates for land supply and population projection. Additionally, this analysis does not look at any of the County's on-going efforts towards densification within the UDB. A conservative estimate of dwelling units resulting from the recent redesignations of land uses within the Cutler Ridge and Perrine Community Urban Centers is 8,500 units. This is over and above the over 20,000 units experienced to date since the projection was made. More dwelling**

**units will be realized from other design charrettes in other urban centers. Please update and rewrite this section to more accurately reflect the growth scenario of the County. Please include in your analysis not only the land supply (as presented by the County) availability, but also the current vacancy rates experienced in the County from the recent market trends.**

This comment was not included in the first Statement of Information Needed (SIN) dated September 15, 2006. Nor were comments regarding of the Applicant's "growth scenario" received before September 20, 2006, as suggested in the first SIN. Rather, the Applicant first received comments on this portion of the ADA on December 15, 2006. Pursuant to section 9J-2.022(3)(c), Florida Administrative Code (FAC), "Comments and questions not referenced or included within the written notice and rendered to the applicant after the regional planning agency's 30-day review period has expired may not be used as the basis for additional sufficiency questions and may be answered at the applicant's discretion".

The "growth scenario" presented by the Applicant in the ADA and referenced-above is not required to be included in the ADA by Florida Statute or as part of the Parkland Agreement to Delete. Therefore, the Applicant will be prepared to discuss the issue during the Comprehensive Development Master Plan amendment process.

- 3. Comment No. 5, Pages 1 and 2. The site plan does not comply with the CDMP policies relative to the location and distance requirements of public schools in proximity to the UDB. Schools should be located as far from the UDB as is practical. Placement of the high school at the UDB is inconsistent with the CDMP policy EDU-2A, especially since the entire site is vacant and this is merely a site plan issue. Please address the re-siting of the schools. It is recommended that the applicant consult with the Planning Division staff.**

The Applicant's response to the County's suggested location and distance requirements for public school siting remains as presented in the Response to First Statement of Information Needed dated October 2006. However, a possible alternate high school site has been identified, as indicated on Revised Map H, and is being considered as the Project's site plan process goes forth.

- 4. Comment No. 6, Page 2. Applicant's response addressed our concerns and comments are noted. Please advise when corrections are made so that updated information may be logged onto our system.**

The Applicant is in the process of working with the County to obtain the necessary records to correct the Property Appraiser's files.

- 5. Comment No. 8, Page 2. The October 2006 projected Countywide residential supply is to the year 2019, 16 years beyond the date of the EAR as stipulated in Policy LU-8F. This projection shows a one-year increase in residential units over the projections prepared during the EAR. Policy LU-8F does not require a distinction between single family and multi-family units when addressing Countywide supply. Additionally, the satisfaction of need is based on the Countywide criteria and not the MSAs upon which the Study E was based. The South Central tier has a residential capacity until 2012. Therefore this evaluation as currently presented is not valid.**

**Please correct your narrative and use correct information germane to the evaluation of consistency with the CDMP. Please analyze the other portions of**

**Policy LU –8G that indicate reasons for priority inclusion including proximity to urban centers and surplus facility service capacity.**

This comment was not included in the first Statement of Information Needed (SIN) dated September 15, 2006. Nor were comments regarding the ADA Question 10 – Part 2, Consistency with Comprehensive Plans, Items A, B, and C received before September 20, 2006, as suggested in the first SIN. Rather, the Applicant first received comments on this portion of the ADA on December 15, 2006. Pursuant to section 9J-2.022(3)(c), Florida Administrative Code (FAC), “Comments and questions not referenced or included within the written notice and rendered to the applicant after the regional planning agency’s 30-day review period has expired may not be used as the basis for additional sufficiency questions and may be answered at the applicant’s discretion”.

The Applicant has noted the comment above and will address the points raised during the CDMP amendment process.

6. **Comment No. 9, Pages 2 and 3. The applicant suggests that the CDMP states that the County has recognized the Parkland area as appropriate for “urban development”. Such a determination has not yet been rendered. This DRI is not located in an “Urban Expansion Area” (UEA) as identified by the CDMP. The UEAs were identified as the area most likely to expand in the future based upon analysis by the County staff. The passage cited is looking at environmental factors only and is not to be interpreted as a justification for development into agricultural areas. Several policies, and even the County’s Strategic Plan, call for the protection of agricultural areas. Please rewrite this section and accurately reflect the policies of the CDMP.**

The Applicant respectfully disagrees that the section of the Adopted Components of the CDMP titled “Ultimate Development Boundary” is “looking at environmental factors only”. As to whether or not this section of the CDMP is to or “is not to be interpreted as justification for development into agricultural areas” is not specifically stated in the CDMP. Rather, what is stated is that the area of the proposed project is “more appropriate for” urban development. Furthermore, the County’s Strategic Plan is not a part of the County’s CDMP. Therefore, there is no prohibition within the CDMP to developing agricultural lands.

7. **Comment No. 10, Page 3. The County has determined that agriculture in Miami-Dade County is an essential component to the uniqueness of the area. The studies that the Applicant has referred to all acknowledge this industry’s importance. The methodologies outlined for prioritization of agricultural land are not adopted by the County and therefore cannot be relied on. Historically, this land has been in active agriculture and therefore it could be conducive to long-term agriculture. Please refine these statements.**

The Applicant has provided the requested professional studies upon which the Applicant concluded that the “Parkland property, located immediately adjacent to existing dense urban development, is not conducive to long-term agricultural activity”. The Applicant respectfully stands behind the responses in ADA and SIN as drafted.

8. **Comment No. 13, Pages 4 and 5. The data supplied by the Applicant is insufficient to address the potable water issue. Although the applicant is within the WASD water and wastewater service area, the population projections for the service area do not include population projected for these TAZs. Since this is an extension of the service area, this would be considered new unaccounted for population for the**

service area. Therefore, the applicant must address how they will mitigate impacts to the water supply. As with other amendments to the CDMP, the County will be looking at specific projects to address the growth of the area. The applicant will need to identify a source of water for the entire project and identify the funding sources and implementation timeframe for water supply facilities.

It does not appear that the applicant has met with the WASD staff to discuss how the proposed impacts of the development should be addressed. With a projected average day increase of 1.87 MGD and a maximum day increase of 4.2 MGD demand, the applicant is responsible for the unanticipated impact to the WASD system beyond the cost of line extensions. Please give a detailed description of the projects that are necessary to provide water for this project, along with the timing and funding and any necessary amendments to the CDMP Capital Improvements Element. What portion of the water supply facilities funding, if any, will come from the applicant to reduce the cost of unanticipated water supply development to the County?

The applicant met with Miami-Dade County Water and Sewer Department and Planning Department staffs on January 12, 2007. Representatives of the Regional Planning Council also attended that meeting, at which the county's regional water supply plans were discussed. It was agreed that the county uses population projections to guide their water supply planning. How that population is distributed is irrelevant; only the total number of people is critical for planning purposes.

Miami Dade County is currently pursuing the renewal of the County's consumptive use permit for its entire regional water system, and is simultaneously proposing to amend its 5-year schedule of Capital Improvements in the Capital Improvements Element as well as its 10-year water supply facilities work plan. See attached Appendix I, showing projected 20-year water supply sources, and Appendix II, showing proposed amendments to Capital Improvements Element. When the consumptive use permit is issued, and the amendments to the Capital Improvements Element and the Water Supply Plan are adopted, an adequate water supply for this project will be available.

In addition, it was explained that all of the county's water treatment plants are interconnected, so that no single plant will be responsible for providing water for this project.

9. **Comment No. 14, Pages 5 and 6. As stated by the Applicant, the project will conform to current laws, rules and regulations, yet the applicant states that they will "consider" some items, such low flow toilets, which the County is in the process of requiring. The applicant has made no real commitment to try to decrease the use of water in this development, has not met with the WASD staff to discuss conservation measures and has not acknowledged the County's commitment to water conservation as adopted by the Board of County Commissioners. The applicant will be required to meet with the WASD staff and develop a plan that will outline specifically what conservation measures they are proposing for this development. The applicant should demonstrate, where possible, their commitment to achieving a plan that will meet the County's 155 gallons (or less) per capita per day water use by the project. This plan must state specifically what measures will be incorporated and not just indicate "where practicable or feasible".**

Parkland will comply with future guidelines for applications to amend the Miami-Dade Comprehensive Development Master Plan addressing water conservation and

alternative water supply. Miami-Dade County staff, along with selected private sector and public sector interests, currently is preparing these guidelines.

**The applicant must provide more detail on the proposed satellite re-use facility. It is not clear that such a facility been reviewed by WASD. Please provide details demonstrating how such a facility will reduce the non-potable demands. It is not acceptable to say that by putting the effluent back to the WASD system will reduce the non-potable demand. It is simply replacing the water with a credit. Please indicate how the applicant intends to promote non-potable water conservation within the development. Please state if the applicant will provide people living in the development the means to use less non-potable water (cisterns for collection of stormwater to be used in irrigation, reduced flow devices and appliances, etc.).**

The applicant met with Miami-Dade Water and Sewer Department on January 12, 2007. The satellite re-use facility was discussed at that meeting, but it is uncertain if WASD is comfortable with the concept of installing small satellite re-use facilities to serve individual projects. Irrigation alternatives for the Project will be assessed and applied Wherever they are efficient.

- 10. Comment No. 15, Pages 6 and 7. The applicant must demonstrate how the proposed satellite facility will integrate with the County's long range water re-use plans. No details have been provided regarding the satellite system, its actual flow reduction or the efficiency of the membrane. These need to be evaluated by WASD prior to approval of the DRI. As stated above, the treatment plant capacity may exist, but the proposed development constitutes an increase in the service area that was not anticipated, and therefore impacts to the system must be identified and fully evaluated by the WASD staff prior to approval of the DRI.**

The applicant met with Miami-Dade County Water and Sewer Department and Planning Department staffs on January 12, 2007. Representatives of the Regional Planning Council also attended that meeting, at which the county's regional water supply plans were discussed. It was agreed that the county uses population projections to guide their water supply planning. How that population is distributed is irrelevant; only the total number of people is critical for planning purposes.

Miami Dade County is currently pursuing the renewal of the County's consumptive use permit for its entire regional water system, and is simultaneously proposing to amend its 5-year schedule of Capital Improvements in the Capital Improvements Element as well as its 10-year water supply facilities work plan. See attached Appendix I, showing projected 20-year water supply sources, and Appendix II, showing proposed amendments to Capital Improvements Element. When the consumptive use permit is issued, and the amendments to the Capital Improvements Element and the Water Supply Plan are adopted, an adequate water supply for this project will be available.

In addition, it was explained that all of the county's water treatment plants are interconnected, so that no single plant will be responsible for providing water for this project.

- 11. Comment No. 16, Page 7. See comments above. The provided narrative is not sufficient for an evaluation by the staff.**

The applicant met with Miami-Dade County Water and Sewer Department and Planning Department staffs on January 12, 2007. Representatives of the Regional Planning

Council also attended that meeting, at which the county's regional water supply plans were discussed. It was agreed that the county uses population projections to guide their water supply planning. How that population is distributed is irrelevant; only the total number of people is critical for planning purposes.

Miami Dade County is currently pursuing the renewal of the County's consumptive use permit for its entire regional water system, and is simultaneously proposing to amend its 5-year schedule of Capital Improvements in the Capital Improvements Element as well as its 10-year water supply facilities work plan. See attached Appendix I, showing projected 20-year water supply sources, and Appendix II, showing proposed amendments to Capital Improvements Element. When the consumptive use permit is issued, and the amendments to the Capital Improvements Element and the Water Supply Plan are adopted, an adequate water supply for this project will be available.

In addition, it was explained that all of the county's water treatment plants are interconnected, so that no single plant will be responsible for providing water for this project.

- 12. Comment No. 18, Pages 7 and 8. Applicant's response addressed our concerns. The applicant extended SW 172 Avenue to SW 136 Street. With regard to the proposed connection of theoretical SW 144 Street to Krome Avenue, the applicant stated that Miami-Dade Public Works Department (PWD) supports the extension of SW 144 Street to Krome Avenue. Applicant will coordinate with FDOT to determine when the Access Management Plan will be submitted to the Board of County Commissioners as provided by Policy TC-4E of the county's Traffic Circulation Subelement. However, Department staff would like to see SW 167 Avenue as a continuous arterial facility.**

SW 167 Avenue has been designed as a continuous arterial facility connecting SW 136 Street on the north with SW 152 Street on the south. The conceptual design for this portion of the roadway was reviewed with the Miami-Dade Public Works Department on September 13, 2006, and the Department found the conceptual design to be satisfactory at this early stage in the development review process.

- 13. Comment No. 19, Page 8. The response provided did not address our concerns regarding the consideration of the principles outlined in the "Guidelines for Urban Form" (Land Use Element, pp I-20.2 through I-23)**

Parkland has been designed, to the extent feasible, in accordance with the planning principles outlined by the "Guidelines for Urban Form" as set forth by the CDMP. It is important to remember that the "Guidelines for Urban Form" state, "Exceptions may occur (a) for Developments of Regional Impact and Development of County Impact..." Parkland is a Development of Regional Impact encompassing approximately 960 acres in which constraints including but not limited to the CSX rail, limited access to Krome Avenue, the proximity of Tamiami Airport, and zoning constraints create a need to vary from the guidelines.

Each Guideline is shown in italics and underline with the Applicant's discussion of how Parkland conforms following each Guideline.

*1. The section line roads should form the physical boundaries of neighborhoods.*

The conceptual development plan has been created using the county section line and half-section line roads to provide the organizational structure for the adjacent project

roadways and the internal roadway network. The Project is bounded by section line roads on the north, west and south (SW 136<sup>th</sup> Street, SW 177<sup>th</sup> Avenue and SW 152<sup>nd</sup> Street), and a half section line road on the east (SW 162<sup>nd</sup> Avenue). Attached Map J-5A (R) in the Appendix, included in the original ADA and revised in the first SIN, shows the location of the section and half-section line roadways which form the organizational structure of Parkland.

2. The section line, half section line, and quarter-section line road system should form a continuous network, interrupted only when it would destroy the integrity of a neighborhood or development, or when there is a significant physical impediment. Pedestrian and vehicular traffic networks should serve as physical links between neighborhoods, with multiple points of access between neighborhoods;

As shown in attached Map J-5A the section line and half-section line roadways form a continuous network. To a large extent, the interior loop boulevard forms the quarter-section line roadway which forms a continuous network with SW 167<sup>th</sup> Avenue, SW 172<sup>nd</sup> Avenue, SW 144<sup>th</sup> Street and portions of SW 152<sup>nd</sup> Avenue. It is important to recognize that quarter-section line roadway connections north to SW 136<sup>th</sup> Street and west to SW 177<sup>th</sup> Ave are not possible due to limited crossing of the CSX rail tracks and FDOT opposition to additional connections to Krome Avenue, respectively. Quarter-section line roadway connections are also shown along SW 162<sup>nd</sup> Avenue. Additional quarter-section line roadway connections may be identified during the site plan review portion of the project approval process.

3. Within a section, a variety of residential types and densities are encouraged, with higher densities being located at the periphery, and lower densities in the interior;

Parkland encompasses approximately a section (bounded by SW 167<sup>th</sup> Avenue, SW 136<sup>th</sup> Street, SW 177<sup>th</sup> Avenue, and, SW 156<sup>th</sup> Street) and a half-section (bounded by SW 167<sup>th</sup> Avenue, SW 136<sup>th</sup> Street, SW 162<sup>nd</sup> Avenue, and SW 156<sup>th</sup> Street). A variety of residential types including Low Density (8 du/ac net); Low Medium Density ( 12 du/ac net); and Medium Density (20 du/ac net) are included in both the section and half-section. In both cases the higher density residential is located along the periphery (SW 167<sup>th</sup> Avenue.) The exception is the Low Density residential located west near SW 177<sup>th</sup> Avenue, which is proposed in that location to allow a decreased density of development adjacent to Krome Avenue.

4. Intersections of section line roads shall serve as focal points of activity hereafter referred to as activity nodes. Activity nodes shall be occupied by any nonresidential components of the neighborhood including public and semi-public uses. When commercial uses are warranted, they should be located within these activity nodes. In addition, of the various residential densities, which may be approved in a section through density averaging or on an individual site basis, the higher density residential uses should be located at or near the activity nodes;

The section line road intersections of SW 136<sup>th</sup> Street / SW 167<sup>th</sup> Avenue, and, SW 152<sup>nd</sup> Street / SW 167<sup>th</sup> Avenue are designed as activity nodes. Uses adjacent to these intersections are the appropriate nonresidential components including retail, office, services, medical offices, hospital and high school. Industrial use is proximate to the intersection of SW 136<sup>th</sup> Street / SW 177<sup>th</sup> Avenue. Again, the exception to this Guideline is along Krome Avenue where development density is proposed to be decreased.

5. Areas abutting and adjacent to activity nodes should serve as transition areas suitable for eligible higher residential densities, public and semi-public uses including day care and congregate living uses;

The areas abutting and adjacent to activity nodes include higher density residential and uses such as the high school. These uses serve as transition areas to the lower density residential areas which include the parks, open space and K-8 schools.

6. Areas located along section line roads between transition areas are also authorized for eligible higher residential densities, public and semi-public uses. When section line roads are served by adequate mass transit, these areas are more suitable for office uses than such properties not served by adequate transit.

Higher residential density is proposed between the transition areas along SW 167<sup>th</sup> Avenue

7. Sites located near the center of the section at or near the intersection of half-section roads may be utilized for neighborhood-serving community facilities such as elementary schools, day care, recreational uses, and open spaces.

The elementary schools, recreational areas and open spaces are located near the center of the section and half section areas.

8. Pedestrian circulation shall be provided between activity nodes, all public places, and all subdivisions through connectivity of section, half-section and local roadways constructed with sidewalks and supplemented by pedestrian paths;

The conceptual development plan has been designed to accommodate bicycle and pedestrian facilities within the on-site and adjacent roadway cross sections. Parkland's interconnected roadway network and design choices offer alternative mobility opportunities to Project residents and employees, and assists in mitigating traffic congestion

Parks and other community centers are situated throughout the entire Project, usually located in close relationship to the quarter section line roads and local roads. Pedestrian routes will travel along and across these open spaces as they connect the different activity nodes and residential centers of the development.

Attached in the appendix is the "Internal Connectivity" diagram, which illustrates the pedestrian circulation options within the Project.

9. Along arterials, Major and high-speed roadways, pedestrian circulation should be accommodated by sheltering sidewalks from passing traffic by providing landscaping and trees at the street edge. In commercial areas, pedestrian access should be further accommodated by pedestrian pathways from the neighborhood to the business entrances as convenient as those from parking lots, and by providing awnings, overhangs or porticos for protection from the sun and weather.

Pedestrian circulation paths will be designed with landscape elements that protect the pedestrian from the roadways, and will provide the pedestrian with multiple route options connecting the different activity nodes of the Project, as illustrated in Map J-5B.

10. The walling off of neighborhoods from arterial roadways should be avoided by alternatives such as placement of other compatible uses being along the periphery of



suburban neighborhoods. These uses include public and semi-public uses, higher density residential building types, and office uses, where any of such uses are otherwise permitted by this category and justified. If lower density residential uses are to be located on an arterial, the building lots should be provided with ample setbacks, side yards and block ends should face the arterial, frontage roads may be utilized, or landscaping should be used in lieu of continuous walls.

Parkland's mixed-use, mixed-density design program ensures that the community offers a variety of residential types and densities. The organization of Parkland's densities is arranged so that the highest concentration of activity is at the intersection of section line SW 167<sup>th</sup> Avenue with section line SW 136<sup>th</sup> Street and section line SW 152<sup>nd</sup> Street. These two activity nodes accommodate the greatest concentration of retail and employment land uses supported by the higher density residential development, directly consistent with the "Guidelines for Urban Form". Conversely, given the unique western boundary of the DRI at Krome Avenue, the intersection of section line SW 177<sup>th</sup> Avenue with section line SW 136<sup>th</sup> Street and section line SW 152<sup>nd</sup> Street reflects lake area and open space to be used as buffers adjacent to Krome Avenue, with low density residential development extending eastward into the heart of the DRI.

The northern edge of Parkland along SW 136<sup>th</sup> Street is partially segmented by the CSX railroad corridor and is located near the Kendall-Tamiami Executive Airport. These factors have defined the industrial-flex space, medical office, and hospital uses that occupy most of the northern edge of the DRI. The railroad corridor has the potential to become a mass transit alignment serving the west Kendall area, making the SW 136<sup>th</sup> Street corridor most desirable and suitable for office and employment uses. The highest density residential components in the DRI are situated along SW 167<sup>th</sup> Avenue, the section line road that connects the two activity nodes. This density allows for a smooth transition from the activity of the commercial centers to the calmer rhythms of the medium density single family attached townhouses, located to the east and west of the condominiums. Finally, the single family detached homes are situated along the western and eastern edges of Parkland. The eastern edge housing blends well with the already existing single family homes built east of SW 162<sup>nd</sup> Avenue, and acts as a buffer to the more dense and active uses occurring along SW 167<sup>th</sup> Avenue.

Parkland's three schools are strategically placed in accordance with the "Guidelines for Urban Form". The two primary schools (K-8) are located near the intersections of half section line roads. The high school, because of its larger size and heavier density, is situated along the southern section line road, next to one of the activity nodes. This location provides greater accessibility to the high school from the adjacent communities located to the south, east and west of the DRI.

11. In planning and designing new residential developments, the frontages of public canals should be designed to remain open and accessible to neighborhood residents by such measures as the provision of adjoining frontage streets, and the avoidance of platting new contiguous building lots which would back up to the canal rights of way and prevent access. Similarly, new developments should be designed so that at least a portion of the shoreline of private water bodies will remain visible and accessible to neighborhood residents.

The water bodies that will be developed within Parkland will also remain easily accessible to the public, as they run parallel to the landscaped greenways located adjacent to Parkland's local roads.

14. **Comment No. 27, Page 11.** The applicant identified the CSX/Tri-Rail Kendall Extension (Project No. TR000026) and the CSX/Tri-Rail Dolphin Extension (Project No. TR000027) as Planning Projects, which are included in the Unfunded Priority Needs Section of the 2007 TIP. Furthermore, applicant states that MPO staff has indicated that in June 2006, the Kendall Corridor Study was amended to include the analysis of the CSX Rail Corridor as part of the study and therefore the action served as amendment to the 2030 LRTP. Department staff disagrees with this interpretation of an amendment to the LRTP. However, for any transportation improvement project to be considered in a traffic analysis the project must be identified as a programmed transportation improvement in the 2007 TIP or as a cost-feasible project in the adopted 2030 LRTP. The applicant must state that the CSX project is not a programmed project of the 2007 TIP or a planned project of the 2030 LRTP.

Please note the following in response to Comment 14:

1. The Applicant has accurately stated the status of the CSX Rail Corridor as a Planning Project contained within the Unfunded Priority Needs Section of TIP 2007. The Applicant has also accurately stated the inclusion of the CSX Rail Corridor as one of the corridors under review and study as part of the Kendall Link Corridor Study.
2. Table 21.A4 in Question 21 identifies the CSX–Tri-Rail Kendall Extension (Project Number TR000026) and the CSX-Tri-Rail Dolphin Extension (Project Number TR000027) as Planning Projects which are included in TIP 2007 in the Unfunded Section of the TIP. These two projects were included in Table 21.A4 to demonstrate that while they were unfunded at the time that TIP 2007 was adopted, they are included in the Miami-Dade MPO Transportation Improvement Program adopted by the MPO on May 25, 2006.
3. On June 22, 2006, the MPO approved a modification to the Kendall Corridor Alternatives Analysis Consultant Contract to include the study of the CSX-Tri-Rail Corridor (see Map J-12B in Question 21 obtained from the Miami-Dade County MPO). The Kendall Corridor Alternatives Analysis (now called the Kendall Link) includes a detailed study of the CSX Rail Corridor (currently underway) to examine the feasibility of operating passenger commuter transit service to the Kendall area, and the need for double tracking, frequency of service, timing, costs, etc. The Miami-Dade County MPO Staff indicated in June 2006 that the amendment to the MPO Kendall Corridor study to include the analysis of the CSX-Tri-Rail Corridor serves as the action needed to make the CSX Rail Corridor a part of the LRTP 2030, since it has been made a part of the Kendall Corridor Premium Transit Project.
4. Based upon the status of these CSX Rail Corridor planning studies, NO transit reduction has been incorporated into the DRI Question 21 trip generation analysis, and no corridor capacity has been relied upon based upon the existence of the CSX Rail Corridor as an operational transit facility. The DRI represents only what has already been published by the Miami-Dade County MPO in either TIP 2007 or the Kendall Link Alternatives Analysis. Therefore, the DRI Question 21 analysis does not rely upon the CSX Rail as a funded rail corridor since it is not funded within the first three years of the five year work program.

15. **Comment No. 32, Page 13.** Our concern is that once SW 136 Street and SW 152 Street are completed the residents south of SW 184 Street and west of Krome Avenue will continue to use Krome Avenue up to SW 152, SW 136 and SW 88 Streets to access the west Kendall area. We understand that it might be more convenient for residents south of SW 184 Street, between SW 137 Avenue and Krome Avenue, to use SW 157 Avenue north to access west Kendall; however, we believe that a 15 percent diversion from Krome Avenue might be too high. Perhaps an analysis including the improvements to Krome Avenue, SW 157 Avenue, the HEFT, SW 117 Avenue, SW 88, SW 136, SW 152 and SW 184 Streets could provide more information to determine the diversion.

Pursuant to comments from FDOT, the diversion percentage off of Krome Avenue and SW 137 Avenue has been revised and limited to 5%.

## **RESPONSE TO REVISED QUESTIONS**

### **QUESTION 10 – GENERAL PROJECT DESCRIPTION**

16. **Pages 10-6 to 10-9 - Project Design**

The staff has made a preliminary evaluation of the proposed site plan and has the following comments:

The conceptual development plan provided, while it may generally conform to the CDMP Guidelines for Urban Form, appears to recreate the typical West Kendall development pattern of the last 30 years with an internal loop collector road surrounded with development parcels. This pattern has negatively impacted the section line road system by relying on circuitous internal collector roads, which do not compliment the regional grid system. Additionally, the conceptual development plan does not provide street connectivity at the quarter-section level as illustrated in the Generalized Neighborhood Development Pattern graphic (Figure 1, page I-22).

At a minimum, the internal loop collector should be straightened and provide at least T-intersections with theoretical SW 164th and 174th Avenues to provide additional through access and connectivity to the surrounding street system. Theoretical SW 169th Avenue should also connect to the internal collector from both the north and south section-line roads. Similarly, theoretical SW 140th and 148th Streets should be extended from the east into the project and connect to the internal collector road.

Other comments regarding location of the schools were provided under Comment No. 5. Also, please indicate if the Applicant has asked for input from the Department of Parks and Recreation on the location and sizes of the proposed parks. There is no indication that anyone from the PARD was contacted.

**It is strongly recommended that the Applicant meet with the staffs of DP&Z and PARD to further evaluate the site plan.**

The Applicant met with the Park and Recreation Department staff on October 23<sup>rd</sup>, 2006 and with DP&Z staff on February 28<sup>th</sup>, 2007. We discussed the Project's site plan, which is only in its working conceptual stage, and the Project's park distribution. We will continue to work with the DP&Z staff and the PARD staff to reach an appropriate site plan.

## **QUESTION 21 - TRANSPORTATION**

17. **Page 21-2, Table 21.A2, Traffic Impact Study Area Determination Based Upon 5% Rule. – Revise table to make the following corrections:**

- **SW 177 Avenue from US 27 to SW 8 Street, change the Peak Hour Directional Maximum Service Volume (MSV) to 1530 (Table 4-7, State Two-Way Arterial, LOS B, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 177 Avenue from SW 272 Street to SW 296 Street, change the Adopted LOS to C and the MSV to 720 (Table 4-7, State Two-Way Arterial, LOS C, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 162 Avenue from SW 72 Street to SW 88 Street, change the adopted LOS to EE (Sunset KAT provide mass transit service to the segment), and change the MSV to 760 (Table 4-7, Non-State Roadways, 1 Undivided, LOS D, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised to reflect the adopted LOS EE standard, however this segment of SW 162 Avenue is a four lane divided roadway today, not a 2 lane undivided roadway.

- **Add to the SW 162 Avenue analysis the segment from SW 104 Street to SW 112 Street, a two-lane facility.**

Table 21.A2 has been revised as requested.

- **SW 137 Avenue between SW 136 Street and SW 152 Street, change the MSV to 3096 (Table 4-7, Non-State Roadways, 3 Divided, LOS E+20%, 2002 Quality /Level of Service Handbook) as this portion of the corridor is county roadway.**

Adopted Figure 3 in the Miami-Dade County Transportation Element from the December 2005 EAR identifies SW 137 Avenue from SW 88 Street to SW 152 Street as a State Principal Arterial. The 2005 FDOT Florida Highway Data CD classifies this same segment of SW 137 Avenue as an Urban Principal Arterial. The Urban Principal Arterial functional classification for SW 137 Avenue from SW 136 Street to SW 152 Street is assigned by FDOT since SW 137 Avenue has been designed and constructed as a 6 lane divided arterial which meets the state roadway design standards, and which is located immediately adjacent to existing state roadways. The use of the State Two Way Arterial capacity for this segment of SW 137 Avenue is appropriate based upon the design characteristics of the roadway. In response to the First Sufficiency Submittal for the Parkland DRI, FDOT District 6 and their Consultant (in their letters dated November 21, 2006) accepted the use of the State Two Way Arterial capacity for SW 137 Avenue from SW 136 Street to SW 152 Street, based upon the design characteristics of the roadway. SW 137 Avenue from SW 136 Street to SW 152 Street has been assigned an arterial class based upon the appropriate signal grouping per mile. Just because the jurisdiction of this roadway is now under County control, it does not change the fact that the roadway was designed to meet state standards, and as an Urban Principal Arterial, is eligible to reflect the State Two Way Arterial capacity.

- **Segments of SW 117 Avenue between SW 88 Street and SW 152 Street, change the existing lanes to 4LD and MSV to 1620 (Table 4-7, Non-State Roadways, LOS D, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **Florida's Turnpike from NW 12 Street to SR 836, change the existing number of lanes to 6 and the MSV to 5530 (Table 4-7, Freeways, LOS D, 2002 Quality /Level of Service Handbook).**

The existing lane geometry from NW 12 Street to SR 836 is made up of both mainline and auxiliary lanes as this short segment accommodates the transition to and from SR 836. The existing lane geometry for northbound and southbound traffic reflects (at a minimum) 8 travel lanes. No change to Table 21.A2 for this segment is needed.

- **Florida's Turnpike from SW 8 Street to SW 40 Street and between SW 152 Street and SW 184 Street, change the existing number of lanes to 6 and the MSV to 5530 (Table 4-7, Freeways, LOS D, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested for the segment from SW 8 Street to SW 40 Street. The existing lane geometry from SW 152 Street to SW 184 Street today reflects an 8 lane freeway, therefore no changes to Table 21.A2 for this segment is needed.

- **Florida's Turnpike from SW 200 Street to SW 216 Street, change the existing number of lanes to 4 and the MSV to 3440 (Table 4-7, Freeways, 2 lanes, Interchange spacing < 2 mi., LOS D, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 8 Street from the HEFT to SW 107 Avenue, change the existing number of lanes to 6 and the MSV to 2790 (Table 4-7, State Two-Way Arterial, LOS E, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 24 Street (SW 26 Street) from SW 147 Avenue to SW 137 Avenue, change the LOS to EE (Coral Way MAX services this segment) and the MSV to 2064 (Table 4-7, Non-State Roadways, LOS E+20%, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 40 Street (SW 42 Street) from SW 157 Avenue to SW 147 Avenue, change the LOS to EE (Bird Road MAX services this segment) and the MSV to 2064 (Table 4-7, Non-State Roadways, LOS E+20%, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 72 Street between SW 162 Avenue and SW 152 Avenue, change the LOS to EE (Sunset KAT services the segments) and the MSV to 2064 (Table 4-7, Non-State Roadways, LOS E+20%, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 88 Street between SW 167 Avenue and SW 127 Avenue, change the adopted LOS to EE (Kendall KAT services this corridor) and the MSV to 2232 (Table 4-7, State Two-Way Arterial, LOS E+20%, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested.

- **SW 104 Street from SW 167 Avenue to SR 874, change the adopted LOS to EE (Killian KAT services this corridor) and the MSV to 2232 (for 4 lanes and 3348 (for 6 lanes), (Table 4-7, Non-State Roadways, LOS E+20%, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested to reflect the adopted LOS of EE. The 2005 FDOT Florida Highway Data CD classifies SW 104 Street as an Urban Minor Arterial. Therefore, the non-state roadway capacities have been used to define the maximum service volumes at the adopted LOS of EE.

- **SW 152 Street from 162 Avenue to SW 147 Avenue, change the adopted LOS to EE (Coral Reef MAX services this segment) and the MSV to 2940 (Table 4-7, Non-State Roadways, LOS E+20%, 2002 Quality /Level of Service Handbook).**

Table 21.A2 has been revised as requested to reflect the adopted LOS of EE.

- **SW 152 Street from SW 137 Avenue to the HEFT, change the MSV to 3096 (Table 4-7, Non-State Roadways, LOS E+20%, 2002 Quality /Level of Service Handbook).**

Adopted Figure 3 in the Miami-Dade County Transportation Element from the December 2005 EAR identifies SW 152 Street from SW 137 Avenue to US-1 as a State Principal Arterial. The 2005 FDOT Florida Highway Data CD classifies this same segment of SW 152 Street as an Urban Principal Arterial. The Urban Principal Arterial functional classification for SW 152 Street from SW 137 Avenue to the HEFT is assigned by FDOT since SW 152 Street has been designed and constructed as a 6 lane divided arterial which meets the state roadway design standards, and which is located immediately adjacent to existing state roadways. The use of the State Two Way Arterial capacity for this segment of SW 152 Street is appropriate based upon the design characteristics of the roadway. In response to the First Sufficiency Submittal for the Parkland DRI, FDOT District 6 and their Consultant (in their letters dated November 21, 2006) accepted the use of the State Two Way Arterial capacity for SW 152 Street from SW 137 Avenue to the HEFT, based upon the design characteristics of the roadway. SW 152 Street from SW 137 Avenue to the HEFT has been assigned an arterial class based upon the appropriate signal grouping per mile. Just because the jurisdiction of this roadway is now under County control, it does not change the fact that the roadway was designed to meet state standards, and as an Urban Principal Arterial, is eligible to reflect the State Two Way Arterial capacity.

- **SW 200 Street/SW 186 Street (Quail Roost Drive) from Krome Avenue to SW 127 Avenue (2-lanes) and from SW 127 Avenue to US 1 (4-Lanes) is a State Road (SR 994). However, SW 200 Street from Quails Roost Drive (approximately E/O SW 127 Avenue) to US 1 (2-lanes) is a county roadway. Please make the distinction between these two roadway facilities and make changes accordingly.**

Table 21.A2 has been revised as requested.

- **US 1 from SW 136 Street to SW 216 Street, change the adopted LOS to EE (the Busway is considered an Extraordinary Transit).**

Table 21.A2 has been revised as requested.

- **Based on the above referenced changes make the necessary corrections and/or adjustments to the rest of the tables.**

The affected tables have been revised where needed.

18. **Map J-2A, Traffic Count Locations – County Counts. Revise map to include the following stations: 9706, 9710, 9728, 9739, 9748, 9750, 9752, 9754, 9763, 9796, 9832, 9857, 9859, 9868, 9874, and 9898.**

Count Stations 9832 and 9859 were already included in Map J-2A(R). The remaining county count stations have been added to Map J-2A(R).

19. **Map J-2B(R), Traffic Count Locations – State Counts. Revise map to include the following stations: 58, 1114, and 1093.**

Map J-2B(R) has been revised to add the three requested state count stations.

20. **Table 21.A3A, Existing Daily and PM Peak Hour Directional Traffic Conditions. Revise table to reflect changes in existing number of lanes and peak hour directional maximum service volumes as requested above, and revise existing peak hour LOS as appropriate. In addition, provide information for the following roadway segments:**

- **SW 162 Avenue between SW 136 Street and SW 152 Street.**
- **SW 137 Avenue between SW 8 Street and SW 88 Street, especially for the four-lane segments between SW 8 Street and Coral Way and from SW 56 Street and SW 88 Street.**
- **SW 117 Avenue from SW 88 Street to SW 152 Street.**
- **SW 88 Street between Krome Avenue and the US 1.**
- **SW 184 Street from the HEFT to US 1.**

The final traffic impact study area for a DRI is defined as those “state and regionally significant roadways” which are “significantly impacted by project traffic” pursuant to Rule 9J-2.045(4), (5) and (6), Florida Statutes. A state and regionally significant roadway shall be significantly impacted by project traffic if the project traffic is greater than or equal to 5% of the adopted maximum service volume, and the roadway is projected to operate below the adopted LOS standards. The segments outlined above were not included in Table 21.A3A since those segments were not found to carry project traffic equal to or greater than 5.0% of the adopted peak hour maximum service volume.

Please note that for the CDMP Amendment Transportation Analysis, the roadway segments identified above (in addition to the larger study area) will all be included in the existing and future traffic conditions analysis for the Year 2015.

SW 162 Avenue extends north from SW 152 Street as a two lane undivided roadway running along the back sides (to the west) of the existing subdivision. This roadway does not yet connect north to SW 136 Street, and therefore is not included in the analysis of existing traffic conditions. Traffic counts were collected at the intersection of SW 152 Street and SW 157 Avenue and SW 136 Street and SW 157 Avenue, the points on the roadway network where the traffic from the existing subdivision west of SW 157 Avenue would intersect with the existing roadway network.

- 21. Table 21.A3B, Determination of the Peak Hour Timeframe for the Study Area. Update the 2004 AM and PM Peak Hour volumes for FDOT stations using the 2005 Traffic Data recently published by FDOT.**

Table 21.A3B has been updated using 2005 FDOT data where available.

- 22. Map J-3D, Timing and Premium Transit Corridors. Revise map to clarify that the feasibility of the CSX premium transit extension from MIA to the Metrozoo and west to Krome Avenue is currently being analyzed under the Kendall Corridor Alternatives Analysis. The findings of the analysis will be available early next year. We don't know at this time what the recommendation for this proposal will be.**

Map J-3D has been revised as requested.

- 23. Table 21.D3, Un-built Committed Development PM Peak Hour Traffic (with and without Providence). Revise table to include in the analysis the following roadways:**
- SW 162 Avenue between SW 136 Street and SW 152 Street.
  - SW 88 Street from Krome Avenue to US 1.
  - SW 184 Street from the HEFT to US 1.

See response to Comment 20 above.

- 24. Table 21.D4, Year 2015 PM Peak Hour Directional Background + Committed Development Traffic Conditions. Revise table as appropriate based upon the comments provided above, specifically the peak hour directional maximum service volumes. Therefore, revise the Year 2015 background LOS, 2015 Total LOS, Percent of maximum service volumes Final, etc. In addition include analysis for SW 162 Avenue from SW 136 Street to SW 152 Street, revise the adopted LOS and MSV for SW 152 Street from SW 162 Avenue to SW 117 Avenue, and add SW 88 Street between Krome Avenue and US 1, and the segment of SW 184 Street from the HEFT to US 1.**

Table 21.D4 has been revised as requested, however the additional roadway segments have not been added pursuant to the response provided to Comment 20 above.

- 25. Table 21.D7, Year 2015 PM Peak Hour Directional Total Traffic Conditions. Revise table as appropriate based upon the comments provided above, specifically the peak hour directional maximum service volumes. In addition include analysis for SW 162 Avenue from SW 136 Street to SW 152 Street, revise the adopted LOS and**



**MSV for SW 152 Street from SW 162 Avenue to SW 117 Avenue, and add the segment of SW 184 Street from the HEFT to US 1.**

Table 21.D7 has been revised as requested to address the changes to the maximum service volumes and lane geometry where needed. SW 162 Avenue from SW 136 Street to SW 152 Street is already included in Table 21.D7. The additional roadway segments have not been added pursuant to the response provided to Comment 20 above.

- 26. Table 21-E1, Traffic Impact Study Area Determination Based Upon 5% Rule. Revise table as appropriate based on comments provided above, specifically the peak hour directional maximum service volumes. Revise rest of columns as appropriate.**

Table 21.E1 has been revised as appropriate.

- 27. Tables 21.F1 and 21.H1. Revise tables as appropriate based on the revisions and findings as appropriate.**

Table 21.F1 and 21.H1 has been revised where appropriate.

**The applicant's transportation consultant must meet with the Department prior to the filing of a CDMP amendment application to discuss the Department's traffic analysis requirements. The Department requires submittal of the CDMP traffic analysis prior to finding the CDMP application sufficient, thereby ensuring that all the required information is in the format needed for the Department's published CDMP Initial Recommendations report. The Miami-Dade County Department of Planning and Zoning reserves the right to make further comments while the project advances through the planning and design stages.**

The Applicant met with the Department to discuss the traffic analysis requirements for the CDMP amendment application, and will provide the analysis after Question 21 – Transportation is deemed sufficient by the SFRPC.