



# MEMORANDUM

AGENDA ITEM #IV.B1

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DATE: AUGUST 8, 2018

TO: COUNCIL MEMBERS

FROM: STAFF

SUBJECT: REGIONAL ISSUES: COMPREHENSIVE PLAN AMENDMENT REVIEWS MIAMI-DADE COUNTY #17-1ESR AMENDMENTS #5 (AMERICAN DREAM MIAMI) AND #6 (GRAHAM PROPERTIES)

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## Amendment Review

Pursuant to the 1974 Interlocal Agreement creating the South Florida Regional Planning Council (Council), the Council is directed by its member counties to “assure the orderly, economic, and balanced growth and development of the Region, consistent with the protection of natural resources and environment of the Region and to protect the health, safety, welfare and quality of life of the residents of the Region.”

In fulfillment of the Interlocal Agreement directive and its duties under State law, the Council reviews local government Comprehensive Plan amendments for consistency with the *Strategic Regional Policy Plan for South Florida (SRPP)*. Pursuant to Section 163.3184, Florida Statutes as presently in effect, Council review of comprehensive plan amendments is limited to 1) adverse effects on regional resources and facilities identified in the SRPP and 2) extra-jurisdictional impacts that would be inconsistent with the comprehensive plan of any affected local government within the Region. The Council’s review of amendments is conducted in two stages: (1) proposed or transmittal and (2) adoption. Council staff reviews the contents of the amendment package once the Department of Economic Opportunity certifies its completeness.

A written report of Council’s evaluation pursuant to Section 163.3184, Florida Statutes, is to be provided to the local government and the State Land Planning Agency within 30 calendar days of receipt of the amendment.

## Introduction

On February 17, 2017 Council staff received proposed amendment package #17-1ESR (Applications # 5 and # 6) consisting of map and text changes to the Miami-Dade County Community Development Master Plan (CDMP). The projects that are the subject of Applications #5 and #6 are located in the North Central tier of Miami-Dade County within the Graham Triangle, bounded by the Homestead Extension of the Florida Turnpike (HEFT) to the northwest, I-75 to the east, and NW 180 Street to the south. **(Exhibit 1)**



Both Applications sought land use designation changes to accommodate the proposed “Development of Regional Impact (DRI)” scale American Dream Miami (ADM) and Graham Properties projects. The Applications were reviewed concurrently by the Miami-Dade County Department of Regulatory and Economic Resources. Miami-Dade County incorporated some of the DRI Application for Development Approval questions into the CDMP Applications. Miami-Dade County review of the amendments includes impacts to economic, environmental, human, and transportation resources; and consistency with applicable state, regional, and local plans and land development regulations. Miami-Dade County and the Council facilitated meetings with regional stakeholders to ensure that sufficient data was provided to assess transportation impacts.

It should be noted that the ADM and Graham Properties developments are among the few large-scale developments in the Region since the elimination of the DRI process under State law. Our Council has commended Miami-Dade County, International Atlantic, LLC, and Graham Properties for their voluntary efforts to adopt DRI-type assessment questions and to partner with the Council as well as affected local governments, review agencies and other interested parties.

Section 163.3184(3)2, Florida Statutes, requires review agencies to provide comments within 30 days of receipt of the amendment package. At the February 27, 2017 Council Meeting, Council staff presented a report containing an evaluation of the potential impacts (Agenda Item IV.E). At that meeting, the Board voted to hold a special meeting on March 10, 2017, at 2 p.m. to allow for greater public notice and participation, and discussion of the Applications and potential extra-jurisdictional impacts and adverse effects on regional resources and facilities.

At the March 10, 2017 Special Meeting, Council staff gave a summary of the review process and recommendations, followed by Applicant and Miami-Dade County presentations and a public hearing. The Board deliberated after asking questions and listening to public comments. The Board drafted language to ensure that adverse impacts identified by Broward and Miami-Dade Counties and affected municipalities would be addressed in a Chapter 163 Agreement, prior to final approval of the amendment. The Board ratified Council staff recommendations and found proposed amendment package #17-1ESR generally consistent with the SRPP; subject to the Board’s caveats pertaining to Chapter 163 Agreements. Staff was instructed to revise its report and recommendation to include the Chapter 163 Agreement text and intended purpose behind it, prior to transmittal to Miami-Dade County and the Department of Economic Opportunity.

The Council’s March 10, 2017 recommendation was to “Find Amendments 5 and 6 of the Miami-Dade County proposed amendment packet #17-1ESR **generally consistent** with the *Strategic Regional Policy Plan for South Florida* (SRPP), but prior to final approval the Applicants need to ensure that the impacts of these developments, including but not limited to intergovernmental impacts to Miami-Dade and Broward counties, and their respective municipalities; transportation; environmental; and other regional impacts identified in Applications No. 5 and No. 6 (May 2016 Cycle, Revised and Replaced January 2017) are adequately quantified and addressed. This specifically includes, but is not limited to, identifying and mitigating regional traffic impacts in Miami-Dade and Broward Counties, and coordination with County Transit Agencies to provide transit service connections to/from North Miami Dade and South Broward to the proposed onsite transit facilities. This shall be accomplished by execution of a Chapter 163 Florida Statutes, or other legal Agreement, which shall be executed reasonably concurrently with the CDMP.”

On July 24, 2018, Council staff received the adopted amendment package following adoption by the Miami-Dade County Board of County Commissioners on May 17, 2018. Among the materials included in

Council staff's review are the transmitted amendment package, Declaration of Restrictions (Covenants), and final Development Orders. Throughout the review process Council staff has coordinated with agency and local government staff, the Applicants, and other stakeholders to assess, as best as information and resources permit, that the issues and conditions raised by the Council at its March 10, 2017 Board Meeting have been or will be addressed.

As part of its review of the adopted amendment package, Council staff offered suggestions for project enhancements and impact mitigation for the consideration of the Applicants and Miami-Dade County.

### **Intergovernmental Coordination**

Prior to the filing of the Applications in the November 2015 CDMP amendment cycle, County Staff discussed with the Applicant and other agencies the methodology for conducting the traffic impact analysis proposed by the Applicant's transportation consultant, Leftwich Consulting Engineers. The proposed methodology differed from that outlined in the County's general requirements for Traffic Impact Analyses. Leftwich Consultant Engineers submitted their Technical Memorandum Methodology for Transportation Impact Analysis (TIA) for Comprehensive Development Master Plan Amendment dated September 3, 2015. That TIA was distributed to County Staff including the Regulatory and Economic Resources, Planning Division (RER), the Department of Transportation and Public Works (DTPW), and the Traffic Engineering Division. The TIA was also distributed to other municipal, regional and state agencies, such as the cities of Hialeah, Hialeah Gardens, Miramar, Sunrise, the Town of Miami Lakes, Broward County, the South Florida Regional Planning Council), Florida Department of Transportation (FDOT) Districts 4 and 6, Miami-Dade Expressway Authority (MDX), and Florida's Turnpike Enterprise.

The first in the series of four public meetings was held on September 21, 2015 at the Council's offices in Hollywood, where the Applicant's transportation consultants, the previously mentioned agencies, and others discussed the methodology. Subsequent to this meeting, on October 16, 2015, the Applicant's transportation consultant submitted its Responses to Comments Received from Reviewing Agencies on TIA Methodology.

The second public meeting was held at the Council's offices on October 23, 2015 to discuss the consultant's responses and the Applications were subsequently filed in the November 2015 CDMP amendment application cycle, along with the Technical Memorandum Addendum on Methodology for Transportation Impact Analysis (TIA), and the Transportation Impact Analysis for the American Dream Miami and The Graham Project report.

The third public meeting was convened at the Council's offices on January 22, 2016 and subsequently on February 23, 2016, the Applicant's transportation consultant submitted a revised Trip Generation Summary for ADM. This was followed on March 14, 2016 with a Technical Memorandum Providing Responses to Comments on Revised Trip Generation for American Dream Miami. The Applicant's transportation consultant later submitted a revised American Dream Miami and Graham Project Transportation Impact Analysis for CDMP Amendment report dated June 22, 2016.

On September 9, 2016 a fourth public meeting was held at the Council's offices to discuss the June 22, 2016 TIA and the agencies' comments on the TIA. That was followed by the Applicant's consultant's submittal of a revised American Dream Miami and Graham Project Transportation Impact Analysis for CDMP Amendment report dated October 10, 2016.

On July 7, 2017, the Council convened a stakeholders meeting, including Broward and Miami-Dade Counties, the cities of Miami Lakes and Miramar, and representatives of ADM and Graham Properties. The purpose of the meeting was to seek consensus relative to the type and amount of potential adverse impacts and adequate mitigation.

On January 22, 2018, Council staff participated in a Broward County meeting to discuss the results of traffic modeling conducted by Broward County consultant staff that modeled the traffic impacts of the proposed development, replicating the applicant’s modeling. Traffic studies for large magnitude projects generally include many assumptions, from trip generation and distribution of traffic to the appropriate improvements to keep traffic flowing at acceptable levels of service. Broward County’s consultant’s modeling showed that manual adjustments to the traffic model forced trips in Broward County to the Homestead Extension of the Florida Turnpike (“HEFT”) caused a few trips on other roadways, such as I-75. The results of the Broward County modeling effort showed that without any forced diversion to the HEFT, there would be impacts at a section of Miramar Parkway around I-75.

Agency Comments

The Florida Department of Economic Opportunity/State Land Planning Agency (SLPA) and other state and regional agencies (reviewing agencies) reviewed the pending applications in March 2017. The Florida Department of Economic Opportunity (DEO), Florida Department of Transportation (FDOT), the Florida Department of Environmental Protection (FDEP), the Florida Fish and Wildlife Conservation Commission (FWC), the South Florida Water Management District (SFWMD), and the South Florida Regional Planning Council offered comments. These are technical assistance comments consistent with Section 163.3184 (3), F.S. **(Exhibit 2)**

Miami-Dade County Final Recommendation Reports of the Department of Regulatory and Economic Resources (RER) dated May 2018 comprise Exhibit 5 (126 pages) of the transmittal package. An excerpt of Exhibit 5 is included in **Exhibit 3**.

Application #5

Application #5 (American Dream Miami) seeks to: 1) re-designate an approximately 174-acre site from “Industrial and Office” to “Business and Office”; 2) remove the 0.45 Floor Area Ratio requirement for the area west of NW 97 Avenue; 3) release applicable Declaration of Restrictions; 4) add proffered Declaration of Restrictions; and 5) amend applicable Transportation Element Figures. The application site is located between NW 154 Street to the South, NW 97 Avenue to the east, and the HEFT on the northwest.

<b>PROJECTED DEVELOPMENT MAXIMUMS – APPLICATION # 5</b>	
<b>PROPOSED USE</b>	<b>DIMENSIONS</b>
<b>Retail</b>	3,500,000 square feet
<b>Entertainment</b>	1,500,000 square feet
<b>Common Area</b>	1,200,000 square feet
<b>TOTAL</b>	<b>6,200,000 square feet</b>
<b>Hotel</b>	2,000 rooms

A Declaration of Restrictions (Covenants) and the Development Agreement were executed. These documents establish maximum square footage of retail, entertainment, hotel rooms, and common areas; development contributions; and standards for development review and implementation.

Application #6

Application #6 (The Graham Properties) seeks to 1) re-designate an approximately 329-acre site from “Industrial and Office” and “Business and Office” and to “Business and Office;” 2) release applicable Declaration of Restrictions; and 3) add proffered Declaration of Restrictions. The Graham Application Area is south of the American Dream Miami site; located between the HEFT to the west, NW 180 Street to the north, NW 97 Avenue to the east, and NW 170 Street to the south.

PROJECTED DEVELOPMENT – APPLICATION # 6	
PROPOSED USE	DIMENSIONS
Business Park	3,000,000 square feet
Retail	1,000,000 square feet
<b>TOTAL</b>	<b>4,000,000 square feet</b>
Residential	2,000 units

A Declaration of Restrictions (Covenants) and Development Agreement were executed. These documents establish maximum square footage of retail, entertainment, hotel rooms, and common areas; development contributions; and standards for development review and implementation.

**Staff Analysis**

The Council’s March 10, 2017 found the amendments **generally consistent** with the *Strategic Regional Policy Plan for South Florida* ; subject to the proviso that prior to final approval by Miami-Dade County, the Applicants needed to ensure the impacts of these developments were adequately understood and addressed, including but not limited to (1) intergovernmental impacts to Miami-Dade and Broward counties, and their respective municipalities; (2) transportation; (3) environmental; and (4) other regional impacts. The following summarizes how the adopted amendments addressed the Council’s recommendations at the proposed amendments stage.

1. Transportation

A Traffic Impact Analysis was conducted by the Applicant’s consultant to identify potential impacts to the transportation network. The complete development of both projects would result in 11,099 PM peak hour trips which is 6,589 more trips than the maximum potential development that could occur under the current land use designation. The TIA methodology and results were reviewed and discussed at several meetings between the Applicant, transportation consultants, and staff from Miami-Dade County, affected municipalities and review agencies prior to ultimate approval by Miami-Dade County.

**Traffic Impact Mitigation, Application #5 (International Atlantic, LLC / American Dream Miami)**

Based on the traffic impact analysis conducted by the Applicant, improvements to the roadway network will be made, and are stipulated in the development agreements, as outlined in **Exhibit 4**. Based on the traffic impact analysis conducted by the Applicant, the following improvements to the transit service and facilities will also serve as traffic mitigation.

The development agreement stipulates that prior to the issuance of a building permit for ADM, the Owners shall<sup>1</sup>:

- Provide \$5.9 Million Dollars to DTPW for the purchase of eleven (11) standard 40' buses.
- Cause the construction of a Metrobus Terminal/Transit Center within ADM ("ADM Transit Center"). The ADM Transit Center shall include ten (10) bus bays that will be made available to Miami- Dade Department of Transportation and Public Works (DTPW) on a priority basis, and three (3) additional bus bays that shall be made available to Broward County Transit on a priority basis; a covered seating area; a restroom facility; and a transit information kiosk. The Owners shall operate and maintain the ADM Transit Center at their sole expense. Notwithstanding any provision to the contrary herein, the Owners may conduct a transit demand study and bus bay analysis at any time, subject to review and approval by DTPW, to demonstrate the need for fewer bus bays.
- In consideration for the Owners' \$5.9 Million contribution-in-lieu of road impact fees, DTPW will extend various existing Metrobus Routes to the ADM Transit Center to provide at a minimum thirty (30) minute peak hour headways.
- To the extent feasible, the Owner will provide dedicated mass transit lanes on the following roadways unless the Miami-Dade County DTPW determines that it is not feasible: NW 97 Avenue between 170 Street and 180 Street; NW 170 Street between the Turnpike and 97 Avenue; NW 180 Street between the Turnpike and I-75; and on Miami Gardens Drive between I-75 and NW 57 Avenue to the extent authorized by FDOT for Miami Gardens Drive.
- Owners will provide for the design and location of pedestrian and bicycle facilities to maximize transportation access both on-site and connecting to adjacent facilities, including on-site bicycle storage facilities to encourage the use of alternative modes of transportation.

It is noted that language relating to the ADM Transit Center stipulates that the Owners are not required to complete the construction of the center but may "cause to construct".

#### **Traffic Impact Mitigation, Application #6 (The Graham Properties)**

Based on the traffic impact analysis conducted by the Applicant, improvements to the roadway network will be made, and are stipulated in the development agreements, as outlined in **Exhibit 5**. Based on the traffic impact analysis conducted by the Applicant, the following improvements to the transit service and facilities will also serve as traffic mitigation.

The development agreement stipulates that the project shall incorporate the following transit contributions, infrastructure enhancements, and transportation management strategies<sup>2</sup>:

- Prior to submittal of any Site Plan, the Owners shall coordinate with DTPW to identify appropriate locations for approximately two potential on-site bus shelters within the Property. The Owners shall be responsible for the installation of bus shelters within those portions of the Property where such shelter locations are identified.

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<sup>1</sup> International Atlantic, LLC Development Agreement, Signed and Dated 7/24/18

<sup>2</sup> Graham Properties Development Agreement, Signed and Dated 7/24/18

- The Owners shall coordinate with DTPW to establish a program that encourages transit use and service to the Property. This program shall include the provision of bus route information to residents, visitors and tenants.
- On an annual basis, the Owners shall provide, to tenants and employees, information regarding rideshare, transit, and other amenities to encourage transit use, carpooling, and vanpooling, utilizing services and programs such as the Florida Department of Transportation's Commuter Services.
- The Owners shall provide for the design and location of pedestrian and bicycle facilities to maximize transportation access both on-site and connecting to adjacent facilities, including on-site bicycle storage facilities, to encourage the use of alternative modes of transportation.
- To the extent that it is cost effective, the Owners shall utilize efficient, low emission vehicles, with specific consideration of alternative fuel vehicles, for on-site services like parking enforcement maintenance and security services.

### **Supporting TOD Development**

The transit mitigation, as identified in the development agreements, will contribute positively to the regional provision of transit. Commitments to new express bus service to regional hubs in Miami-Dade and Broward counties would further support the regional provision of transit. Staff also recommends a plan for Transit Oriented Development design characteristics to be implemented in the final site design, that will ultimately create opportunities for true connectivity to Miami-Dade County's SMART Plan. As noted by the Department of Economic Opportunity, the two amendments in combination represent a significant opportunity to create either a single-centered or poly-centered transit-oriented development. Development that is transit oriented will facilitate safe and convenient pedestrian mobility and access to transit. Site plans should be evaluated as to how the internal circulations systems and development contributes to those objectives.

### **Strategic Intermodal System**

The roadway improvements as identified in the development agreements include new interchanges, and improvements to existing interchanges on the Strategic Intermodal System (SIS), which is of regional significance: 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. These improvements are not currently included in the Miami-Dade Transportation Planning Organization's Transportation Improvement Program, Miami-Dade Long Range Transportation Plan, or the Florida Department of Transportation's Work Program. Staff recommends that the County ensure that the federal evaluation and approvals be obtained, and the interchange improvements be constructed, prior to the projects being opened to traffic. It is noted that it is unclear from the development agreements as to how the interchange improvements would be funded and built by the anticipated opening date of the project in 2023.

### **Extra-jurisdictional Considerations**

As a result of negotiations between Broward County and the Applicants (International Atlantic, LLC and The Graham Companies), an agreement was reached for voluntary transportation improvements that were discussed and deemed to provide "positive impact for residents of both Miami-Dade and Broward counties". The contractual agreement includes payment to Broward County in the lump sum amount of Six Hundred Fifty Thousand Dollars (\$650,000), to be used solely for:

- the adaptive signal control system along Miramar Parkway east and west of I-75 consisting of six (6) signalized intersections from (and including) SW 160th Avenue to Monarch Lakes Boulevard, and
- the necessary fiber-optic system connection from Monarch Lakes Boulevard east to the County's programmed fiber optic extension point at University Drive.

Also, the applicant will provide adequate on-site transit facilities and amenities to accommodate Broward County Transit (BCT) service connections to/from Broward County. These on-site transit facilities will include three (3) bus bays dedicated to BCT for its use on a priority basis (predicated on service provided to the property by BCT), as set forth in the development agreement that is the subject of the International Atlantic Applications, with any reductions in the number of bus bays subject to review and approval by Broward County of the transit demand study and bus bay analysis.

The Town of Miami Lakes requested additional studies be prepared to further identify the traffic impact on local streets within the town. The City of Miramar expressed support for express buses that will serve Miramar and requested mitigation for traffic impacts to Miramar Parkway and bus service to the two sites in Miramar. Impacts to Miramar Parkway will be addressed through the agreement with Broward County. In addition, the Applicant has agreed to provide bus service to Miramar Town Center and another site in the City.

## 2. Economic

The labor force in South Florida continues to present wage rates that are below the national average. This is related to the sectoral composition of the regional economy, based heavily on trade, tourism and the industries that serve a growing population – construction, retail and services. Continuous efforts are being made to diversify the local economy, to attract economic activities that offer jobs with good pay and benefits, and to ensure that employers will find the workforce they need to fill jobs locally. Large-scale projects that bring substantial new employment opportunities help to ensure that the growing population will find employment, and developers are encouraged to ensure that priority is given to local recruitment of employees whenever possible.

The Declaration of Restrictions (Covenants) for both properties include conditions requiring local workers, service and disabled veterans, and university students hiring preferences. The developments will use the South Florida Workforce Investment Board as a referral agency, use Local Certified Veteran Business Enterprises; hire active duty and honorably discharged veterans for construction; seek participation of local universities for architecture design, engineering, and construction, and employ Small Business Enterprise Architecture & Engineering Program and Small Business Enterprise Construction Services Program.

## 3. Attainable Housing

Insufficient housing to meet the needs of the Region's work force, elderly, youth, and families is a continuing challenge and impediment to economic and community development and quality of life. The housing crisis is exacerbated by rising property values, low wages, new housing stock that caters mostly to affluent buyers, and a high cost of living.

According to the Center for Neighborhood Technologies Housing and Transportation Affordability Index, the combined cost of housing and transportation in South Florida and Treasure Coast counties range from



50% to 70% or more of a household's income. Southeast Florida has become increasingly unaffordable for residents, essential workers, college graduates, entry-level hires, and young professionals who would otherwise relocate or stay in the region. Attainable housing - a diversity of housing options along income ranges - is a critical component of community and economic development. Voluntary inclusion of attainable housing provides an opportunity to reduce cost-burdens and transportation demands.

Miami-Dade County has created a Workforce Housing Development Program that provides density bonuses and other incentives for the development of workforce housing. While affordable and workforce housing is not required by Miami-Dade County for Application #6 Graham Properties, County staff has indicated that the Applicants may take advantage of density bonuses and other incentives and programs to create affordable and workforce housing. Additional information can be found at: <https://www.miamidade.gov/zoning/workforce-housing.asp>

#### 4. Schools

Application #6 would result in the development of 2,000 residential units which might increase the project area's student population. A Preliminary Concurrency Analysis indicates that there are not sufficient elementary school seats. The Amended and Restated Interlocal Agreement for Public School Facility Planning in Miami-Dade County (ILA) and school concurrency requirements guide mitigation of impacts to public school facilities.

The Graham Properties Development Agreement provides that "The Project shall comply with the requirements of the Interlocal Agreement for Public School Facility Planning Between Miami-Dade County and Miami-Dade Public Schools ("School Concurrency Agreement"), as may be amended, in effect at the time of application for the applicable development permit and shall provide for any required mitigation in accordance therewith."

#### 5. Environmental Considerations

##### **Wetlands**

Both ADM and Graham Properties are situated on low quality wetlands which has been actively utilized for agriculture in the past. Despite the quality of the wetlands, they still contribute to regional seepage and carbon sequestration. Miami-Dade County's Environmental Considerations tool defines the entire project area as "Depressional Soils & 500 ft buffer" Wetland Areas of Concern. The US Fish and Wildlife Services National Wetlands Inventory denotes at least 281.60 acres of the properties as Freshwater Emergent Wetland. Under Section 24-48.2 of the Miami-Dade County Code, wetland mitigation is defined as "the avoidance, minimization, rectification, reduction or elimination, and replacement of impacted wetlands." Any development on this site warrants proper wetland mitigation as determined through a Class IV Permit with an eye to ensuring that mitigation wetlands are at least as productive as the wetlands they are replacing in terms of ecosystem services and carbon sequestration.

In the Development Agreements, the County requires that the Owners and Developer(s) jointly and separately shall address the impacts of development. The Development Agreement details the standards and expectations that will govern permitting in areas such as wetlands, stormwater mitigation, natural resources, protected plant and animal species, endangered and threatened species, etc. The Development Agreements provide that a mitigation plan to "compensate for unavoidable, permissible wetland impacts" shall be submitted to Miami-Dade County and shall "consider the nesting, roosting, or

feeding habitats used by Federal- or State-designated, endangered or threatened species ...". Staff notes that the prey and food sources of threatened and endangered species may be negatively impacted by light pollution.

Strategies to enhance these projects and minimize adverse environmental impacts include, but are not limited to, utilizing pervious pavement as much as possible, limiting the expanse of impervious surfaces by utilizing parking garages as opposed to surface parking, and providing alternative plans to achieve the objective of minimizing impacts on wetlands (bathymetry, flora, and fauna should biomimic the original wetland lost).

### **Clean Fuels and Electric Vehicle Considerations**

Since 2013, the number of plug-in hybrid (PHEV) and electric vehicles (EV) in Miami-Dade County increased at an average of 47% yearly, and in the MSA at 45% yearly. Providing options for slow and fast charging stations throughout these developments is important to consider as EV owners plan driving times and destination options according to available infrastructure.

In addition to providing infrastructure to accommodate electric and alternative fuel buses and other public transit vehicles, while accommodating visitors, residents, and employees with personal hybrid and electric vehicles, these projects provide an opportunity to deploy electric and clean fuel vehicles as part of the company's fleet and offset greenhouse gas and carbon emissions. Currently, the closest EV stations are located approximately four miles away in Miami Lakes and Miramar (AFDC Station Locator).

Successful projects in other metropolitan areas in Florida include the Drive Electric Orlando's plug-in perks. This partnership program creates non-monetary incentives for EV renters as it gives hotel and parking perks at hotels, theme parks, and convention centers. These are all destinations referenced in the proposal of ADM with comparative traffic and visitor numbers. The incorporation of infrastructure to support plug-in hybrid (PHEV), electric vehicles, and clean-fuel alternatives will provide a wide range of benefits to the Applicants, visitors, employees, and residents.

### **Staff Recommendation**

Relative to ADM/Graham Properties and the Miami-Dade County proposed amendment packet #17-1ESR, the Council's March 10, 2017 recommendation was to "Find Amendments 5 and 6 generally consistent with the *Strategic Regional Policy Plan for South Florida (SRPP)*". The "generally consistent" finding was qualified and conditioned, by the Council's further recommendation that, prior to final approval, the Applicants need to ensure that the impacts of these developments are adequately quantified and addressed, including but not limited to, with respect to intergovernmental impacts to Miami-Dade and Broward Counties and their respective municipalities; transportation; environmental; and other possible regional impacts identified in Applications No. 5 and No. 6 (May 2016 Cycle, Revised and Replaced January 2017). The Council's recommendation specifically includes, but is not limited to, "...identifying and mitigating regional traffic impacts in Miami-Dade and Broward Counties, and coordination with County Transit Agencies to provide transit service connections to/from North Miami Dade and South Broward to the proposed onsite transit facilities. This shall be accomplished by execution of a Chapter 163 FS, or other legal agreement, which shall be executed reasonably concurrently with the CDMP."

Miami-Dade County is commended for designing and implementing a review process that included the Council, adjacent local governments, review agencies, and other stakeholders. Miami-Dade County and

the Applicants should continue to work with review agencies, local governments, and stakeholders to address any outstanding issues that have been raised to date, and those that may be raised during the permitting process, especially in the areas of transportation/transit, water management, and the environment. The developers are encouraged to plan and implement design features that will maximize protection of the environment and wildlife habitat, and encourage transit, affordable housing, energy efficiency and other amenities that contribute to quality developments and communities. Applicants should incorporate into their respective planning and development process climate change resiliency, adaptation, and mitigation strategies recommended by the Southeast Florida Regional Climate Change Compact.

### **Staff Recommendation**

Relative to ADM/Graham Properties and the Miami-Dade County proposed amendment packet #17-1ESR, the Council's March 10, 2017 recommendation was to "Find Amendments 5 and 6 **generally consistent** with the *Strategic Regional Policy Plan for South Florida (SRPP)*". The "generally consistent" finding was qualified and conditioned, by the Council's further recommendation that, prior to final approval, the Applicants need to ensure that the impacts of these developments are adequately quantified and addressed, including but not limited to, with respect to intergovernmental impacts to Miami-Dade and Broward Counties and their respective municipalities; transportation; environmental; and other possible regional impacts identified in Applications No. 5 and No. 6 (May 2016 Cycle, Revised and Replaced January 2017). The Council's recommendation specifically includes, but is not limited to, "...identifying and mitigating regional traffic impacts in Miami-Dade and Broward Counties, and coordination with County Transit Agencies to provide transit service connections to/from North Miami Dade and South Broward to the proposed onsite transit facilities. This shall be accomplished by execution of a Chapter 163 FS, or other legal agreement, which shall be executed reasonably concurrently with the CDMP."

Miami-Dade County is commended for designing and implementing a review process that included the Council, adjacent local governments, review agencies, and other stakeholders. Miami-Dade County and the Applicants should continue to work with review agencies, local governments, and stakeholders to address any outstanding issues that have been raised to date, and those that may be raised during the permitting process, especially in the areas of transportation/transit, water management, and the environment. The developers are encouraged to plan and implement design features that will maximize protection of the environment and wildlife habitat, and encourage transit, affordable housing, energy efficiency and other amenities that contribute to quality developments and communities. Applicants should incorporate into their respective planning and development process climate change resiliency, adaptation, and mitigation strategies recommended by the Southeast Florida Regional Climate Change Compact.

Council's review finds that Miami-Dade County's ongoing process has substantially addressed, or will do so through the permitting process, the concerns elevated by the Council at its March 10, 2017 meeting. Council therefore finds that Amendments 5 and 6 of the Miami-Dade County adopted amendment packet #17-1ESR are **generally consistent** with the *Strategic Regional Policy Plan for South Florida (SRPP)*.

## Council Action

### **Application #5, Miami Dade Comprehensive Plan Adopted Amendment 17-1ESR**

Council finds that, at the present time, Application #5 of the Miami-Dade County adopted amendment packet #17-1ESR is **generally inconsistent** with the *Strategic Regional Policy Plan for South Florida (SRPP)*. Council finds that, to reasonably ensure prospective compliance with applicable SRPP criteria and standards, further clarification is needed as to the timeline, plans, and funding sources for identified roadway improvements to ensure adequate regional transportation facilities in the future.

A key component of addressing increased transportation impacts of American Dream Miami (ADM), with an estimated 30 million tourists per year<sup>3</sup>, are a list of projects included in Table 10-A of Exhibit 5 (BCC Public Hearing, 5/17/2018) and in the International Atlantic, LCC Development Agreement (Recorded 8/3/2018, page 41). Among listed projects, there are three Interchange Access Improvements (I-75 at Miami Gardens Drive; I-75 at the Homestead Extension Florida Turnpike; and new partial interchange at I-75 and NW 178<sup>th</sup> Street); and widening of Miami Gardens Drive. The I-75 System Interchange Access Request process with planning, study, design and engineering, and construction for projects of this scale is complex involving multiple local, state, and federal agencies and potentially multi-year review processes prior to approval, funding, and commencement of construction.

At its August 8<sup>th</sup> meeting, the Council found that there is insufficient information related to how mitigation to State Highway System facilities, roadways of state importance, and additional transportation and transit facilities will be funded and improved prior to the issuance of a certificate for use by the American Dream Miami. While the opening date for American Dream Miami has been reported to be as early as 2024, the anticipated opening date is not clearly defined in the adopted amendment package, development order, or covenant.

The Council recognizes and appreciates Miami-Dade County's commitment in the 163 Agreement to ensure that identified projects will be funded<sup>4</sup> prior to issuance of the certificate of use. Even so, the Council was unable to reach a definitive finding that the project assuredly does not and will not adversely affect regional transportation facilities, level of service, and future transit improvements.

The Council requests that the County continue its efforts to address any outstanding issues raised by the Florida Department of Transportation and other commenting agencies.

The finding of general inconsistency with the SRPP includes, but is not limited to, the following goal and policies:

**SRPP Goal 8** Enhance the Region's mobility, efficiency, safety, quality of life, and economic health through improvements to road, port, and public transportation infrastructure.

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<sup>3</sup> Miami-Dade County 17-1ESR Exhibit 7 (American Dream Miami / The Graham Companies CDMP Application Presentation, Slide 6)

<sup>4</sup> Exhibit 5 – Page 5-11, 507.1 Responsibility/Construct or Cause to Construct -American Dream Miami (May 2016 CDMP Amendment Application No. 5) and Exhibit F – CDMP / Chapter 163 Agreement for American Dream Miami Required Roadway Improvements and Timing – Recorded by the Clerk of Courts 8/3/2018.

SRPP Policy 8.1 Maintain the [Strategic Intermodal System]<sup>5</sup>, other state roads, local roadways, and public transportation systems to preserve the Region’s investment in infrastructure; support daily use and needs; enhance the Region’s global competitiveness and economic health; increase safety; ensure emergency access and response; and provide for evacuation purposes.

**Application #6, Miami Dade Comprehensive Plan Adopted Amendment 17-1ESR**

Council finds that Application #6 of the Miami-Dade County adopted amendment packet #17-1ESR is generally consistent with the *Strategic Regional Policy Plan for South Florida* (SRPP).

**Note:** Council Agenda Item IV.B1 has been revised and updated pursuant to the August 8, 2018 Council Meeting to correct minor scrivener’s errors and include Council Action.

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<sup>5</sup> The Strategic Intermodal System (SIS) replaced the Florida Intrastate Highway System (FIHS) in 2003 and is designated by FDOT, with input from local governments, highway users, and other interested parties.



*Florida Department of Transportation*

RICK SCOTT  
GOVERNOR

1000 NW 111 Avenue  
Miami, FL 33172-5800

RACHEL D. CONE  
INTERIM SECRETARY

March 15, 2017

Mr. Jack Osterholt  
Deputy Mayor/Director  
Miami-Dade County - Department of Regulatory and Economic Resources  
111 NW 1st Street, 12<sup>th</sup> Floor  
Miami, FL 33128

**Subject: Comments for the Comprehensive Development Master Plan  
Application #5 (American Dream Miami) and Application #6 (The  
Graham Companies)  
Miami-Dade County #17-1ESR**

Dear Mr. Osterholt:

The Florida Department of Transportation (Department) has reviewed the proposed amendment to the Comprehensive Development Master Plan (CDMP) for Application #5 (American Dream Miami, or ADM) and Application #6 (The Graham Companies, or CG), with Department of Economic Opportunity (DEO) reference #17-1ESR. In accordance with sections 163.3161(3) and 163.3184(3)(b), Florida Statutes, the focus of our review was on major transportation issues, including adverse impacts to transportation facilities of state importance, and the identification of measures the local government may take to eliminate, reduce or mitigate the adverse impacts. These facilities include the Strategic Intermodal System (SIS) and significant regional resources and facilities identified in the Strategic Regional Policy Plan by the South Florida Regional Council. These facilities are vital to the economic vitality, growth and quality of life of the county, region and state. Local governments with transportation concurrency are required under section 163.3180(5)(h)1.a., Florida Statutes, to consult with the Department when proposed amendments affect facilities on the SIS.

The proposed amendments from Industrial/Office to Business/Office will allow for mixed-use projects for ADM and GP properties located in the southwest corner of the interchange at I-75 and Miami Gardens Drive in northwest Miami-Dade County. The site also is adjacent to the interchange between Florida's Turnpike and I-75. The ADM project proposes 6.2 million square feet of non-residential use plus a 2,000-room hotel. The GP project proposes 1 million square feet of Retail, 3 million square feet of Business Park, and 2,000 multi-family dwelling units. The proposed build-out for

the ADM project is 2020, while the GC project is a phased development with build-out by 2040.

Through the Department's review of the long term adequacy of transportation facilities to meet established acceptable levels of service, as required by sections 163.3177(3)(a)3. and 163.3177(6)(a)8., Florida Statutes, adverse impacts to SIS and significant regional facilities were identified related to the ADM and GP amendments (see attachment containing Tables 2 and 3). This letter reaffirms the Department's agency comments sent to Miami-Dade County on November 23, 2016, in response to the applicant's transportation impact analysis for the combined ADM and GP Comprehensive Development Master Plan.

Comments from the Department regarding the transportation concurrency impacts resulting from the proposed development of the ADM and GP properties, and their subsequent mitigation of those impacts, is provided under a separate cover letter.

The Department is concerned about access and connectivity needs and wants these CDMP amendments to ensure safe and efficient access to the state highway system (SHS) and SIS. The Department also is concerned about preserving and protecting the function and operations of the SHS and SIS from adverse impacts of the plan amendments if adopted. In addition, the Department is concerned about protecting state and federal investments recently made in the I-75 corridor. The following comments are related to the proposed amendment to the CDMP for Application #5 and Application #6. Measures recommended by the Department to eliminate, reduce or mitigate the impact of the proposed amendment on the identified state facilities are provided. Agency comments, if not addressed, may result in a challenge to an adopted amendment.

**Comment No. 1:**

The CDMP traffic analysis reveals adverse impacts to transportation facilities of state importance, including SIS and important state and regionally significant roadways. The Department is concerned with the trip distribution and assumptions included in the traffic analysis. The trip distribution may affect the list of deficient roadway segments and needed improvements in 2040. In addition to Cost Feasible Plan projects, the list of deficient roadway segments shown to need improvements by the ADM/GP analysis in 2040 includes:

1. Homestead Extension of Florida's Turnpike (HEFT) from SW 8 Street to State Road (S.R.) 91/Florida's Turnpike
2. S.R. 91/Florida's Turnpike from I-595 to NW 203 Street
3. S.R. 860/Miami Gardens Drive from I-75 to NW 77 Avenue
4. S.R. 826/Palmetto Expressway from I-75 to Okeechobee Road
5. S.R. 820/Pines Boulevard from I-75 to SW 172 Avenue
6. S.R. 25/Okeechobee Road from NW 154 Street to Florida's Turnpike

7. S.R. 25/Okeechobee Road from Milam Dairy Road to LeJeune Road

As summarized in the attached tables, these roadway links will fail to meet established acceptable levels of service by 2040. Further, they will be impacted adversely by the proposed amendment to the CDMP. Miami-Dade County needs to demonstrate the long term adequacy of transportation facilities to meet established acceptable levels of service, as required by sections 163.3177(3)(a)3. and 163.3177(6)(a)8., Florida Statutes. The County needs to include a plan for how existing and future facility deficiencies will be resolved to meet the identified needs of the projected transportation system as required by section 163.3177(6)(b)1.e., Florida Statutes. Further coordination with the Department is needed to identify how deficiencies on state roads will be addressed. Prior to adoption of this amendment, the County and ADM/GP must determine mitigation commitments to address the identified adverse impacts. Commitments between the County, ADM/GP and the Department should be documented in a development agreement consistent with section 163.3230 through 163.3243 Florida Statutes.

**Comment No. 2:** Both ADM and GP rely upon new interchanges and improvements to existing interchanges (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). These interchanges serve as integral access for both projects and are assumed to be a component of the base transportation network that was analyzed. The Department has determined that an I-75 National Environmental Policy Act (NEPA) Evaluation and approval from the Federal Highway Administration (FHWA) and from the Department are required to move forward with the proposed interchange access. If any of the interchange improvements fail to be approved by FHWA and by the Department, to be funded and/or to be constructed by the opening year of the development, the base transportation network that is the foundation of the CDMP traffic analysis will be invalid. The County needs to include a condition of approval in the Development Order that requires: a) ADM and GP obtain the requisite FHWA and Department approvals for the proposed interchange access changes and construction of the interchange improvements; and b) the interchange improvements be constructed and open to traffic prior to the opening of either project.

**Comment No. 3:** In the "Initial Recommendations May 2016 Standard Application Nos. 5 and 6 to Amend the CDMP" document, County staff provided an in-depth review of ADM's and GP's transportation impacts. On page 6-51, it was noted that the Miami-Dade Department of Transportation and Public Works (DTPW) recommends transit improvements to mitigate ADM and GP transportation impacts. However, no analysis is provided indicating that transit improvements will mitigate adverse impacts to the nearby SIS facilities and roadways of state




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importance. The County needs to provide a plan for how transit will serve these sites.

We look forward to working with the County to address these comments expeditiously to ensure that impacts to the SIS and facilities of state importance are mitigated adequately. Please contact me at (305) 470-5464 if you have any questions concerning our response.

Sincerely,

  
Dat Huynh, P.E.  
FDOT District Six District Planning and  
Environmental Administrator

Attachments: Tables 2 and 3

cc: James Wolfe, P.E. Florida Department of Transportation  
Gerry O'Reilly, P.E., Florida Department of Transportation  
Harold Desdunes, P.E., Florida Department of Transportation  
Stacy Miller, P.E., Florida Department of Transportation  
Patel Mayur, P.E., Florida Department of Transportation  
Alison Stettner, AICP, Florida Turnpike Enterprise  
Lisa Colmenares, AICP, Florida Department of Transportation  
Lisa Dykstra, P.E., Florida Department of Transportation  
Richard Shine, Esq., Florida Department of Transportation  
Carmen Monroy, Florida Department of Transportation  
Dana Reiding, Florida Department of Transportation  
Ray Eubanks, Department of Economic Opportunity  
Mark Woerner, Miami-Dade County Department of Regulatory and Economic  
Resources  
Jerry Bell, Miami-Dade County Department of Regulatory and Economic  
Resources  
Isabel Cosio-Carballo, South Florida Regional Council  
Karen Hamilton, South Florida Regional Council

**TABLE 2**  
**CDMP LINK ANALYSIS AND MITIGATION SUMMARY FOR STATE ROADWAYS ONLY (2040)**  
**FOR AMERICAN DREAM MIAMI MALL & GRAMMI PROPERTIES**

ROADWAY	FROM	TO	No. of Lanes	Number of Lanes	When Needed	Period of Future	Responsibility	Combined ADMM & GP Impact	ADMM/ GP Trip	Does ADMM/ GP Cause Admitt?	Does ADMM/ GP Exceed 1000?*	Combined ADMM & GP Impact	ADMM/ GP Trip	Does ADMM/ GP Exceed 1000?*	Does ADMM/ GP Exceed 1000?*	TIP Status	Final Year in TIP	LIFT Status	Transition in LIFT
NETT	SW 83rd Street	SW 83rd	6+4	10+4	2040	AM & PM	backlog	2.3%	210	No	No	3.4%	307	No	No	widens to 6+4	2016/2019	n/a	Priority IV (2013-2040)
NETT	SW 83rd Street	NW 13 Street	6+4	10+4	2040	AM & PM	backlog	2.3%	209	No	No	3.1%	293	No	No	widens to 6+4	2016/2019	n/a	Priority IV (2013-2040)
NETT	NW 13 Street	NW 24 Street	6+4	10+4	2040	AM & PM	backlog	2.3%	209	No	No	4.0%	418	No	No	widens to 6+4	2016/2019	n/a	Priority IV (2013-2040)
NETT	NW 24 Street	NW 305 Street	6+4	12+4	2040	AM & PM	backlog	2.0%	207	No	No	5.5%	378	No	No	widens to 6+4	2016/2019	n/a	Priority IV (2013-2040)
NETT	NW 305 Street	US-27	6+4	12+4	2040	AM & PM	backlog	2.3%	227	No	No	6.0%	600	No	No	widens to 6+4	2016/2019	n/a	Priority IV (2013-2040)
NETT	US-27	NW 170 Street	6+4	12+4	2040	AM & PM	backlog	3.9%	363	No	No	10.2%	1024	No	No	widens to 6+4	2017/2018	n/a	Priority IV (2013-2040)
NETT	NW 170 Street	CR 823/Red Road	6+4	12+4	2040	AM & PM	backlog	2.8%	253	No	No	7.7%	709	No	No	widens to 6+4	2017/2018	n/a	Priority IV (2013-2040)
NETT	CR 823/Red Road	NW 27 Avenue	6+4	8+2	2040	AM & PM	backlog	7.7%	564	No	No	10.7%	782	No	No	widens to 8 lanes	2016	widened to 8 lanes	Priority IV (2013-2040)
NETT	NW 27 Avenue	Florida's Turnpike	6+4	8+2	2040	AM & PM	backlog	5.1%	435	No	No	7.7%	561	No	No	widened to 8 lanes	2017	widened to 8 lanes	Priority IV (2013-2040)
Florida's Turnpike	Florida's Turnpike	Griffin Rd	8	10	2020 & 2040	AM & PM	backlog	3.6%	261	No	No	4.8%	500	No	No	widened to 8+2	2017	n/a	Priority IV (2013-2040)
Florida's Turnpike	Griffin Rd	Penas Blvd	6	10	2040	AM & PM	backlog	0.8%	58	No	No	7.1%	91	No	No	n/a	n/a	n/a	n/a
Florida's Turnpike	Penas Blvd	NETT	8	10	2040	AM & PM	backlog	1.3%	64	No	No	1.5%	52	No	No	n/a	n/a	n/a	n/a
Florida's Turnpike	NETT	NW 205 Street	8	10	2040	PM	backlog	1.2%	84	No	No	1.7%	124	No	No	n/a	n/a	n/a	n/a
SR 820/Miami Gardens Drive	ADMM Projects Access	n/a	0/5	8	2040	n/a	n/a	31.2%	1129	n/a	n/a	50.3%	1016	No	No	ADMM Project	2020	n/a	Priority IV (2013-2040)
SR 820/Miami Gardens Drive	n/a	n/a	0/5	8	2020	n/a	n/a	30.8%	1117	n/a	n/a	27.7%	1016	No	No	ADMM Project	2020	n/a	Priority IV (2013-2040)
SR 820/Miami Gardens Drive	n/a	n/a	0/5	8	2040	AM & PM	backlog (for 6L)	28.1%	403	n/a	n/a	28.6%	485	No	No	n/a	n/a	n/a	Priority IV (2013-2040)
SR 820/Miami Gardens Drive	n/a	n/a	0/5	8	2040	AM & PM	backlog (for 6L)	18.1%	306	n/a	n/a	20.1%	404	No	No	n/a	n/a	n/a	Priority IV (2013-2040)
SR 820/Miami Gardens Drive	n/a	n/a	0/5	8	2040	PM	backlog	6.4%	154	No	No	18.1%	387	No	No	n/a	n/a	n/a	Priority IV (2013-2040)
SR 826	SR 826	NW 121 Street	6+4	8+4	2040	AM & PM	backlog	2.5%	229	No	No	4.1%	372	No	No	add special use lanes	2017	widened with special lanes	Priority IV (2013-2040)
SR 826	NW 121 Street	NW 11th Street	6+4	10+4	2040	AM & PM	backlog	1.3%	136	No	No	1.2%	292	No	No	add special use lanes	2017	widened with special lanes	Priority IV (2013-2040)
SR 826	NW 108 Street	Shenandoah Road	8+4	14+4	2040	AM & PM	backlog	0.8%	87	No	No	2.6%	241	No	No	add special use lanes	2017	add 4 special use lanes	Priority IV (2013-2040)
SR 154 Street	SR 154 Street	Florida's Turnpike	6	6	2040	AM	backlog	0.3%	5	No	No	0.4%	6	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Florida's Turnpike	Hickory Expressway	6	6	2040	PM	backlog	2.2%	73	No	No	6.3%	185	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Hickory Expressway	Hubbald Drive	6	6	2040	PM	backlog	2.2%	47	No	No	5.4%	166	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Hubbald Drive	Le Jolie Road	6	10	2040	AM & PM	backlog	3.0%	109	No	No	4.0%	138	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Le Jolie Road	Florida's Turnpike	6+4	8+4	0/2	n/a	n/a	1.4%	158	No	No	3.0%	414	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Florida's Turnpike	Griffin Road	8+4	14+4	0/2	n/a	n/a	1.8%	199	No	No	4.7%	520	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Griffin Road	Shenandoah Road	8+4	14+4	0/2	n/a	n/a	4.5%	473	No	No	5.7%	629	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Shenandoah Road	Florida's Turnpike	10+4	10+4	0/2	n/a	n/a	3.7%	473	No	No	4.9%	616	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Florida's Turnpike	Mariner Parkway	12+4	12+4	0/2	n/a	n/a	5.2%	571	No	No	7.0%	895	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Mariner Parkway	Florida's Turnpike	10+4	10+4	0/2	n/a	n/a	6.9%	853	No	No	10.9%	1219	No	No	n/a	n/a	n/a	n/a
SR 154 Street	Florida's Turnpike	SR 820/Miami Gardens Dr	8+4	14+4	0/2	n/a	n/a	7.7%	669	No	No	6.1%	672	No	No	n/a	n/a	n/a	n/a
SR 154 Street	SR 820/Miami Gardens Dr	NW 170 Street	8+4	14+4	0/2	n/a	n/a	5.6%	611	No	No	6.1%	621	No	No	n/a	n/a	n/a	n/a
SR 154 Street	NW 170 Street	SR 826	8+4	8+4	0/2	n/a	n/a	4.9%	483	No	No	5.3%	219	No	No	n/a	n/a	n/a	n/a
SR 826	SR 826	NW 57 Avenue/Red Road	6	6	0/2	n/a	n/a	1.5%	15	No	No	1.7%	203	No	No	n/a	n/a	n/a	n/a
SR 826	NW 57 Avenue/Red Road	Douglas/Crowne Connector	6	6	0/2	n/a	n/a	0.9%	48	No	No	2.0%	111	No	No	n/a	n/a	n/a	n/a
SR 826	Douglas/Crowne Connector	NW 31 Avenue	6	6	2040	AM & PM	backlog	0.8%	46	No	No	2.0%	111	No	No	n/a	n/a	n/a	n/a
SR 826	NW 31 Avenue	NW 100 Avenue	6	6	2040	AM & PM	backlog	1.8%	118	No	No	5.2%	228	No	No	n/a	n/a	n/a	n/a
SR 826	NW 100 Avenue	NW 121 Avenue	6	6	2040	AM	backlog	1.8%	55	No	No	2.2%	75	No	No	n/a	n/a	n/a	n/a

Source: ADMM and GP CDMP Traffic Impact Analysis, October 2016



\* Does ADMM/ GP project type exceed the roadway capacity after total backlog deficiency is resolved, thereby causing need for major improvements? Significant Impact is defined as greater than 5%.

NOTE: The list does NOT include interchange modifications that ADMM and GP have committed to building.

\* Does ADMM/ GP project type exceed the roadway capacity after total backlog deficiency is resolved, thereby causing need for major improvements? Significant Impact is defined as greater than 5%.

\* Does ADMM/ GP project type exceed the roadway capacity after total backlog deficiency is resolved, thereby causing need for major improvements? Significant Impact is defined as greater than 5%.

Combined ADMM/ GP trips are reported for the roadway direction with the highest volume.

**TABLE 3**  
**CDMP INTERCHANGE MITIGATION SUMMARY (2020)**  
**FOR AMERICAN DREAM MIAMI MALL & GRAHAM PROPERTIES**

INTERSTATE FACILITY	CROSS STREET	Type of Interchange Document
I-75	Miami Gardens Drive	IMR
I-75	HEFT	IMR
HEFT	NW 170 Street	IJR
I-75 (partial interchange access proposed)	NW 178 Street	IJR

*Note: These interchange improvements are included by the Applicant in their base roadway network for their analysis. As such, these improvements must be constructed and open to traffic concurrently with the opening of the project.*