

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FDOT	Transportation	T2.3.3	<p>Page 555 of Exhibit2: Transportation Element Policy T2.3.3 provides the level of service (LOS) standards for concurrency. There are several changes to these standards; of particular importance to FDOT is the absence of standards in the Policy's Transportation Concurrency Management Area (TCMA) Table to address development impacts to the SIS. As currently written, the policy could be interpreted to impose an unreasonable standard (allowing traffic volumes 75% above adopted LOS standard) on SIS facilities contrary to Chapter 163.3180(5)(c) and 163.3177(1)(f), F.S. When comparing the adopted Peak Hour Two Way Maximum Service Volumes in the Policy to the LOS Table "Generalized Peak Hour Two-Way Volumes for Florida's Urbanized Areas", published by the Florida Department of Transportation, the results indicate that the County's adopted volumes exceed the saturation flow rates for the facilities. This represents a theoretical impossibility. The standards may have the effect of denying the Department access to participation in the concurrency process outlined in 163.3180(5)(h)1.c. and 163.3180(5)(h)1.d, F.S. These LOS standards are also contrary to the long term LOS standards adopted in Policy T2.4.2, being that the unreasonableness of the standards is contrary to the achievement of the long term LOS standards, which are in line with professionally acceptable methods.</p>	<p>Broward County has addressed this comment by adding language to provide for an alternate level of service (LOS) for Strategic Intermodal System (SIS) roadways. This incorporates existing policy language in the Transportation Element that exempts roadways on the SIS from traffic volume LOS specified for Transportation Concurrency Management Areas (TCMA). The updated LOS policy is consistent with FDOT policy, namely LOS 'D' for SIS urban facilities and LOS 'C' for SIS rural facilities. Additionally, policy language has been added that requires Broward County to consult FDOT on mitigation plans that involve SIS facilities.</p>
FDOT	Transportation / Capital Improvements	T2.3.3	<p>The LOS standards proposed by the County in Policy T2.3.3 are insufficient to ensure the availability of public facilities and the adequacy of those facilities to meet established acceptable levels of service per 163.3177(3)(a)3 and 163.3177(3)(a)4, F.S. Upon review of the Capital Improvements Element, it is not clear if the listed projects satisfy all deficiencies in the LOS standards. Exhibit 3 for the Transportation Element provides information showing that the level of service standards will be exceeded for selected roads and for transit ridership.</p>	<p>Broward County staff has addressed this comment by amending "Appendix B" in the Transportation Element Support Document to include current LOS attainment and funding status and by incorporating language to annually monitor transportation LOS attainment. Prior to adoption, the Capital Improvements Element (CIE) will be amended to include FY19 adopted budget tables that align with revised LOS for TCMA's. The CIE and Transportation Element will also be amended to reflect the recent passage of a One-cent Charter County and Regional Transportation System Surtax.</p>
FDOT	All Elements	Multiple	<p>The Comprehensive Plan does not coordinate the compatibility of multiple elements such that data that is relevant to multiple elements is compatible across horizon years per Chapter 163.3177(2) F.S. By having different long-range planning horizons for multiple elements, particularly land use, housing, and transportation, it is difficult to gauge whether adequate infrastructure and services are being planned for implementation. The table below provides the long-term planning horizons for each element, and the bullets after the table provide examples of why it is important to use common planning horizons and how the plan can be enhanced.</p>	<p>Upon receipt of this comment, Broward County staff reached out to the Florida Department of Economic Opportunity (DEO) for clarification on Chapter 163.3177(2) F.S. The DEO concurred that while the minimum requirement is a 10-year long-range planning horizon, the Statute allows additional planning periods for specific components and elements.</p> <p>All the elements meet the 10-year minimum long-term horizon. However, some elements go beyond the minimum, like transportation, to conform with agency planning horizons, such as the MPO Metropolitan Transportation Plan. Upon review, Broward County staff adjusted the long-range horizon for the Housing Element from 2030 to 2045. The BMSD Element will keep the 10-year horizon while using consistent data. Please note that the service area for the Land Use and Housing elements is limited to the 11-square miles of urban Broward County that remain unincorporated (Broward Municipal Services District.)</p> <p>BrowardNEXT2.0 elements all use consistent datasets, which include the US Census and its products (e.g. five-year American Community Surveys (ACS)) and the allocation of the University of Florida's Bureau of Business Research (BEBR) population forecasts through our countywide Population Forecast and Allocation Model (PFAM) which has a 2045 horizon. PFAM is shared with all local governments in the County and the data is also used by the Broward Metropolitan Planning Organization (MPO) and the South Florida Water Management District (SFWMD) for infrastructure planning, among others. Furthermore, Broward County coordinated through significant outreach to ensure that the communities contributed their visions of future growth and worked with external agencies, such as the MPO, SFWMD, and the School Board in the development of the most recent PFAM.</p>

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FDOT	Transportation	T2.3/T2.4	<p>4. Transportation Element Objective T2.3 (Page 555) calls for maintenance of Broward County's concurrency system. Transportation Element Objective T2.4 (Page 559) calls for analysis of long-term impacts from development to shift from an automobile focus to a context sensitive methodology. Broward County should consider implementing multimodal measures for evaluating the performance of the transportation system for concurrency and long-term planning. These measures can include quality of life (e.g., equity and health measures), safety measures, economic prosperity measures (e.g., increased economic activity in pedestrian oriented centers), multimodal transportation measures (e.g., transit service, bicycle lane gap/enhancement, or congestion reduction and travel reliability), and resilience measures. For example, former Transportation Element Policy 3.1.3 (deleted) provides bicyclist and pedestrian safety measures with targets for reductions in injury rates. Broward County should look to expedite this effort and include FDOT and the Broward MPO as partners in the effort. The FDOT Source Book at http://www.fdot.gov/planning/FTO/mobility/2017sourcebook.pdf is a data source for mobility performance measures for all modes, and includes a section on people-related measures with analysis methodology. The I-95 Corridor Mobility Planning Project includes a dashboard of performance measures of interest to multiple partners to consider for performance management in Broward County. FDOT also may be able to provide select data or technical support. If the Broward County's emphasis is to provide a people-oriented approach for transportation, additional people-oriented measures should be considered.</p>	<p>Thank you for this comment and the technical references. Broward County looks forward to continued partnership with FDOT in the evaluation of transportation concurrency under T2.3.1</p>
FDOT	Transportation	T3.4.18/T3.4.32	<p>The Transportation Element in the current comprehensive plan includes policy providing for monitoring and reporting on the status of the transportation system (3.4.18, 3.4.32). Suggest adding a tracking and reporting requirement for the LOS standards and other performance metrics in the proposed Transportation Element. Meeting this requirement could be in collaboration with and with assistance from FDOT and the Broward MPO.</p>	<p>Monitoring of roadway LOS is currently addressed in T2.3.8(1). Per recommendation, a new policy (T2.3.10) was added to specifically address annual monitoring of LOS within TCMA's (transit measures).</p>

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FDOT	Transportation	T2.4.2	<p>5.Pages 559-560: SIS highway corridors are part of the State Highway System, and SIS highway connectors in Broward County are on a combination of state and local roads. Since it appears item Policy T2.4.2, #1 is to apply only to the SIS, suggest this revised wording:</p> <p>“In accordance Consistent with FDOT LOS Policy for the State Highway System effective April 19, 2017 (Topic No.: 000-525-006-c), automobile mode LOS targets for the State Highway System (SHS) highway corridors and connectors on the Strategic Intermodal System during peak travel hours are “D” in urbanized areas and “C” outside urbanized areas.”</p> <p>Also suggest changing the “SHS Corridor” heading in the item 1. table to “SIS Corridor” and adding two rows to the table, one with a “SIS Connectors” heading and the other with “SIS Highway Connectors Designated by FDOT” and a “D” LOS target. An individual listing of SIS highway connectors, as is done in Transportation Element Policy 3.4.2.3. in the current comprehensive plan, is not recommended because changes stemming from SIS designation criteria changes are forthcoming. As one example, Fort Lauderdale Executive Airport is proposed to be added to the SIS, with designation of a highway connector to a SIS highway corridor (e.g., I-95) to follow. Some of the “all other streets” under item T2.4.2, #2 subject to “D” or “E” LOS standards are non-SIS state roads. Under item T2.4.2, #2. or as additional items, suggest adding long range standards or performance measures with targets covering the pedestrian, bicycle, and transit modes consistent with Broward County’s multimodal vision for transportation.</p>	Text edits to FDOT LOS policy and associated table made per recommendation.
FDOT	Transportation	T4	Page 574, Goal T4: Suggest changing “Southeast Florida Metropolitan Area” to “Southeast Florida region” for consistency with wording used elsewhere in the Transportation Element and to avoid creating a new term for the tri-county area.	Edited per recommendation

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FDOT	Transportation	T4.4	<p>7. Page 579-580: Suggest these changes to Objective T4.4: "Broward County supports continued improvements to and an adequate level of service along for the FDOT's multimodal Strategic Intermodal System as a Statewide transportation and economic priority."</p> <p>Policy T4.4.1 outlines multiple strategies to address regional connectivity. Several text enhancements are suggested: (Similar changes are recommended in the Support Document.)</p> <ul style="list-style-type: none"> • Paragraph: Suggest this addition: "Recognizing the growing need for regional, interregional, statewide, and international connectivity...." • Paragraph and Item 11.: The Florida Intrastate Highway System was replaced with the SIS and so should be deleted. • Item 1: Suggest these changes: "Widening and implementation of High Occupancy Toll lane an Express Lanes network with applicable noise mitigation infrastructure;" • Item 2.: Express bus services will also be provided on I-75. • Item 6.: A Project Development and Environment (PD&E) study for SW 10th Street is underway and could be referenced (http://www.fdot.gov/projects/sefl/future/sw10st/index.shtml). Improvements on SW 10th Street and its interchange with I-95 have been funded through construction. • Item 8.: Is a study of "use of the Florida East Coast Railroad as an urban transit corridor" in addition to planning for the Tri-Rail Coastal Link (http://www.tri-railcoastallink.com/#)? • Item 9.: Suggest this addition: "Removal of road barriers and connection of discontinuous roadways to fill gaps and enhance roadway networks." • Item 12.: Suggest this addition: "Continued participation in initiatives, such as the I-95 Corridor Mobility Planning Project, that address issues and opportunities involving SIS facilities from a holistic, multiple stakeholder perspective, and" • Item 14.: There is one SIS waterway corridor in Broward County – the Atlantic Intracoastal Waterway. <p>The Department can provide a map of SIS facilities in Broward County for insertion in the comprehensive plan if requested.</p>	Edited per recommendation
FDOT	Transportation/ Housing	T	The County may want to consider more closely linking transportation and housing by evaluating affordability using combined housing and transportation costs and clarifying policy to encourage locating affordable housing near transportation opportunities, particularly transit. The Housing Element covers the regulatory service area (BMSD) and the planning service area (Broward County and its municipalities). Comments for the Housing Element (below) provide more detail.	Existing policy in Land Use Plan links housing and transportation by permitting bonus density for affordable housing located in close proximity to transit (BCLUP Policy 2.16.3). Broward County will continue to identify new ways to link housing and transportation.
FDOT	BMSD	BMSD	Page 37 of Exhibit 3: Table B (Land Use) seems to suggest that future land use will not be able to support the number of residential dwelling units projected in the year 2040. There does not seem to be any provision in the comprehensive plan to address this concern. It is recommended that "ensuring demand for residential land use is met", or similar phraseology, be added under objective BMSD 1.3. If the intent is to limit residential growth or coordinate with surrounding municipalities to meet demand then this should be stated.	Broward County has a Land Use Plan Amendment (LUPA) procedure for applicants to apply for additional density/capacity. Per BMSD1.1.14, Broward County is evaluating the feasibility of establishing Activity Centers in the BMSD to promote economic and community development.
FDOT	Capital Improvements	CI	Voters recently approved creation of a local option one-cent sales tax. Capital Improvements Element Policy CI5.3 calls for the pursuit of such a local option sales tax and can be rephrased to reflect passage and guidance on how the funds will be distributed. The Transportation Element should provide policy direction regarding the types of projects/services that will be supported, agency/department responsibilities, and a timeline for implementation.	Broward County will edit CI5.3 and add policy language in the Capital Improvements and Transportation Elements that reflects the recent passage of the 1-cent Charter County and Regional Transportation System Surtax. See new policy CI1.14 and amended T3.1.

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FDOT	BMSD	BMSD	<p>The BMSD Land Use and Community Planning Element provides general policy for all areas and then specific direction for most of the neighborhoods. An unincorporated area in the “Wedge” is part of the BMSD planning area, yet it does not have more specific policy direction. This area should be developed consistent with the Complete Streets vision of the comprehensive plan and the Transportation Element, as well recommendations offered to address transportation needs as part of annexation of the “Wedge” into Broward County and removal of the once planned extension of University Drive into Palm Beach County. Generally the recommendations are to support multiple north-south and east-west travel in a multimodal fashion. As such, FDOT recommends that roadway connections to Trails End and Hillsboro Boulevard be included in policy language, reinforcing the rights-of-way included in the Broward County Trafficways Plan. Also, recommendations to promote transit connectivity, including through pedestrian and bicycle infrastructure should be included.</p>	<p>As noted in this comment, the Broward County Trafficways Plan provides for roadway connectivity in the Wedge. Policies supporting the Trafficways Plan in the Transportation Element are located under Goal 3.</p>
FDOT	Transportation, Climate Change, Capital Improvements	Multiple	<p>Several policies in Exhibit 2 for the Transportation, Climate Change, and Capital Improvements Elements include coordination and collaboration with other agencies. Given its role in the operation and maintenance of Strategic Intermodal System (SIS) and State Highway System (SHS) facilities, inclusion of FDOT as a partner in the following policies is recommended:</p> <ul style="list-style-type: none"> •Page 175: Policy CI3.8 requires a mitigation plan approved by Broward County for future land use map amendments within Standard Concurrency Districts that will cause the LOS to deteriorate below the adopted standard. FDOT should be consulted when developing a mitigation plan given its role in providing mobility, including on the Strategic Intermodal System. •Page 177: Policy CI5.1 requires capital improvements needed to maintain LOS which are the financial responsibility of other entities be included in the CIP. FDOT is not listed, although its adopted work program is incorporated through inclusion in the Broward MPO’s Transportation Improvement Plan (TIP). •Page 409: Climate Change Policy CC4.7 regarding establishment of green easements in development codes, recommend adding collaboration with FDOT on FDOT-maintained facilities. •Page 545: Policy T1.1.7 calls for Broward County to update its codes regarding traffic calming. Coordination with FDOT as part of this update is recommended; FDOT staff can provide a systemwide perspective and offer recommendations to improve safety and meet mobility and accessibility needs. •Page 569: Policy T3.3.1 items 3 and 4 are areas in which FDOT is directly involved (e.g., through its Alert Today Alive Tomorrow, Safe Routes to Schools, and Community Traffic Safety Team programs). FDOT should be included with the Broward MPO on these items. •Page 582: Policy T4.5.11 on resilience refers to regional and local transportation partners, which may include FDOT District 4. It would be clearer if more specifics were included on the list. •Page 582: Policy T4.5.12 on adaptive signal control refers to regional and local transportation partners, which may include FDOT District 4. It would be clearer if more specifics were included on the list. 	<p>Broward County will add FDOT or "state agencies" as a partner in the policies identified.</p>
FDOT	Transportation	T	<p>In several locations, the Goals, Objectives, and Policies adopt other plans by reference, typically providing hyperlinks to the documents for ease of use. This is a laudable practice for providing information to the reader, but one that may frustrate future readers if the links are moved or disabled. Chapter 163.3177 F.S. states, “The adoption by reference must identify the title and author of the document and indicate clearly what provisions and edition of the document is being adopted.” Examples of references where additional source information is needed are:</p> <ul style="list-style-type: none"> •The reference to the Broward Complete Street Guidelines in Policy T1.1.1, page 542. •The reference to the Broward County Transit “Connected” Transit Development Plan in Policy T2.1.1, page 551. (Note: This link is not functioning.) •Airport master plans adopted by reference in Policy T4.1.2, page 575. •References to the Port Everglades Vision/Master Plan in the Deepwater Port Element, starting on page 446. 	<p>Thank you. Broward County will repair the broken hyperlinks and include additional details for plans adopted by reference.</p>

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FDOT	Backup	Multiple	Exhibit 7 of the amendment package provides an overview of how the comprehensive plan was modified as compared to the currently adopted comprehensive plan. There are few reasons offered as to why changes were made, making it difficult for reviewers to assess differences in policy and provide meaningful input to Broward County. It was particularly difficult for renumbered/edited policies to evaluate why a substantial change may have been made (e.g., the transportation LOS standards), or why a policy was deleted or added.	Policy changes were made consistent with the BrowardNEXT approach including use of plain language, focus on priorities and implementation, consolidation of objectives and policies, elimination of duplicate policies, performance measures and monitoring, examples of policy implementation, relevant illustrations, and mobile friendly documents.
FDOT	Transportation	T	Page 539: Introduction, second paragraph provides context about the transportation systems in Broward County and the region. It is clear the vision is a multimodal approach, yet vehicular travel will continue to exist throughout the planning horizons and mention of roadways in this paragraph would be appropriate.	The introduction currently mentions the Florida Highway System, Florida Turnpike Enterprise System as well as freight movement.
FDOT	Transportation	T	Page 541 of Exhibit 2: Consider adding access to the overall goal for transportation: “The Transportation Element of the Comprehensive Plan is intended to set the core vision for access and mobility...” This suggestion relates to common definitions for accessibility (ability to reach desired destinations, activities, goods, and services) and mobility (movement of people and goods).	Edited per recommendation
FDOT	Transportation	T1.1.3	Page 542: T1.1.3 and T1.1.4 encourage context sensitive implementation of Complete Streets and requests to experiment regarding the Manual on Uniform Traffic Control Devices (MUTCD). FDOT has released the FDOT Design Manual (FDM) that implements its context sensitive approach to implementing the FDOT Complete Streets Policy (Topic No. 000-625-017-a). It would be beneficial to reference the FDM because FDOT is using it when coordinating with local governments, including Broward County, for projects on state roads. See http://fdot.gov/roadway/fdm/ .	Edited per recommendation
FDOT	Transportation	Multiple	Some policies in the Transportation Element use the term “complete streets” as a noun instead of an approach to ensuring a facility addresses the needs of all its users (not necessarily all users). In some cases, it appears the term is being used to convey a type of transit corridor. The term is not defined and the reader is referred to the Broward Complete Streets Guidebook. Also, the support document does not identify which facilities in Broward are identified as “complete streets.” Without clarification, it is not clear when a specific policy applies. For example: <ul style="list-style-type: none"> •Page 547: Objective T1.2 and its policies provide language to promote safe and comfortable travel by all users along Complete Streets. These policies focus on transit and walking/bicycling connections. It would be appropriate to specify the intent in these policies or add similar objective or policy language to address automobile and truck travel. For example, reducing radii reduce road crossing distances for pedestrians but may make truck turning movements difficult. •Page 549: Objective T1.3 and its policies talk about connecting greenways, blue-ways and off-network paths to activity centers and Complete Streets. It is not clear which streets need to be connected to these other types of recreation and transportation corridors. 	Broward County has clear policy language for the context-sensitive implementation of complete streets. Freight movement is part of the street context that is considered when selecting design elements for complete streets. Also, Objective T4.6 addresses coordinated planning, operations, and capital investment to ensure efficient freight transportation.
FDOT	Transportation	T2.6	Page 550, last sentence on page: Should the wording be “eliminate” or “avoid” rather than “reduce” disparate impacts to historically disadvantaged populations? Same comment for T2.6 on page 563.	Edited per recommendation

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FDOT	Transportation	T20.1.2	Page 551: T2.1.2 mentions the inclusion of transit stop amenities as the first of several actions. If the intent is to order these by priority, there are many non-appearance related factors, such as service frequency, that weigh heavily on potential riders decision to take transit.	Actions listed in T2.1.2 are not listed in order of priority. The Transit Development Plan, adopted by reference, contains a more detailed discussion of rider preferences based on passenger surveys and how BCT's plans meet customer needs.
FDOT	Transportation	T2.1.2	Page 552: Suggest modifying item 5. In Policy T2.1.2 to cover more than consistency with the TDP (i.e., provide for Broward County involvement in longer range planning for transit and the overall transportation system beyond the 10-year planning horizon for the TDP). The 2045 Metropolitan Transportation Plan (formerly Long Range Transportation Plan) under development by the Broward MPO is to include a 2045 transit vision.	While the core requirement of a Transit Development Plan is to plan for the 10 year horizon. "BCT Connected" contains a Vision Plan, now funded via Transportation Surtax, that contains projects out 30 years. County support for consistency between the TDP and MTP can be found in T2.1.2(4).
FDOT	Transportation	T2.1.5	Page 553: T2.1.5 addresses first- and last-mile connections through shared mobility options. It is appropriate to include park-and-ride locations in the listed examples.	Edited per recommendation
FDOT	Transportation	Multiple	Given the need and desire to operate the existing transportation system more effectively and efficiently, it would be appropriate to include a mobility objective focused on managing the system. Policies could address enhancing traffic signal systems, including updating signals and devices, enhancing real-time performance monitoring, deploying adaptive signal control or pedestrian or bicycling signals where appropriate, and evolving to new technologies supportive of connected/autonomous vehicles and pedestrian/bicyclist safety. The Transportation Element includes these types of policies, such as T2.3.8.6, but several are not listed under a mobility objective. For example, Policy C2.1 calls for maintaining and operating a system of synchronized signals to minimize exhaust emissions, and Policy T2.5.2 includes an operations policy under a fossil fuel reduction objective. Given passage of the local option sales tax, Broward County could take an even more proactive role in implementing traffic operations strategies.	Most of the policy examples cited are already located in the Transportation Element. Traffic management policies are located in Goal T4. For instance, T4.4.3 Regional ITS Infrastructure, T4.5.4 I-95 Integrated Corridor Management, T4.5.5 TSM&O, and T4.5.12 Adaptive Traffic Signal Control. Autonomous/connected vehicles are addressed in policies under Objective T2.7 and bicycle signals and signal detection in T1.1.6.
FDOT	Transportation	T2.2.1	Page 553: Policy T2.2.1 talks about using the plans of BCT, SFRTA, FDOT, and the Broward MPO when siting and designating activity centers or mobility hubs. Broward County may also want to include private sector providers, such as Virgin Trains USA (aka Brightline). It should also be pointed out that there is no definition of a mobility hub in the comprehensive plan or in the Broward County Land Use Plan.	Edited per recommendation
FDOT	Transportation	T2.5.1	Pages 561-562, Policy T2.5.1: Does item 1. encompass Broward County's commitment to move to an all EV bus fleet?	No, Broward County is currently piloting EV technology. It is premature to have a EV goal or commitment for transit vehicles until the technology has been proven to be successful. The adopted TDP currently contains a 25% alternative fuel fleet goal.
FDOT	Transportation	T4.2.5	Page 577: Policy T4.2.5 addresses infrastructure improvements needed to support Port Everglades' projected needs. A similar policy for Fort Lauderdale-Hollywood International Airport would be appropriate.	Infrastructure needs for FLL are outlined in the FLL Master Plan which has been adopted by reference.
FDOT	Transportation	T4.3.3	Page 578: Policy T4.3.3 was edited such that the feeder bus service provision has been deleted. If Broward County is providing any such service at Tri-Rail stations, the information should be retained to promote the county's multimodal vision.	Broward County Transit provides local bus service to all Tri-Rail Stations located within Broward County plus service to Golden Glades in Miami-Dade County. The TDP outlines a vision plan, now funded via Transportation Surtax, that will increase service on many routes that provide service to Tri-Rail stations. Policies to improve convenience and access of BCT to regional rail can be found in T4.3.4 and T4.3.6. Support for first/last mile shuttles (e.g. Tri-Rail Shuttles) is located in policy T4.3.5. The concern for duplicitous services was addressed by via sub-policy T3.2.1(1) on the efficient use if transportation funding.
FDOT	Transportation	Support Doc	Page 584: Figure T-1 shows cross-county commuting flows for Southeast Florida. The data is pertinent, but lacks a source and year. It is recommended that the figure and/or text include information describing the source of the data to establish context.	Edited per recommendation

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FDOT	Transportation	Support Doc	Page 593: The document states “There are more than 325 departure and arrival flights a day. FLL offers nonstop service to 140 U.S. cities and flights to Canada, Bahamas, Caribbean, Mexico, Latin America, and Europe. FLL averages 640 commercial flights per day on 26 airlines.” It is recommended that the text differentiate between domestic, international, or non-commercial flights in the beginning of this passage to reduce any potential confusion towards the end of the passage.	Edited to reduce potential reader confusion.
FDOT	Transportation	Support Doc	Page 606: Figures T-6 and T-7 highlight pedestrian and bicyclist crashes in Florida by time of day, but does not mention day of week or month of year, which may have some policy implications. As data becomes available, it will be important for Broward County to track seasonal and daily volumes in order to evaluate whether adjustments to policies are warranted.	Comment noted - will consider for future updates.
FDOT	Transportation	Support Doc	Page 588: The document states, “One improvement travelers will notice shortly will be the conversion of all electronic tolling as well as improvements to key interchanges, such as Sunrise Blvd, that will reduce congestion and provide a more direct connection with the Turnpike.” The word “off” may have been intended to read “to” or “of”. It is recommended this be corrected for clarification.	Edited per recommendation
FDOT	BMSD	BMSD	As noted above, additional policy direction for northwest neighborhoods in the “Wedge” is important to ensure development and corresponding transportation infrastructure support a multimodal transportation system. Broward County is challenged with retrofitting its transportation systems to be more transit and multimodal oriented. The northwest area provides an opportunity to incorporate complete street principles, supporting interconnected modes, in a “greenfield” environment.	As noted in your comment, the Broward County Trafficways Plan provides for roadway connectivity in the Wedge. Policies supporting the Trafficways Plan in the Transportation Element are located under Objective T3.4. Objectives and Policies that support and encourage complete streets are located under Goal T1.
FDOT	BMSD	Support Doc	Page 41: The Annexation of Enclaves first bullet states “...with between...” It is recommended to use either “with” or “between”, not both.	Edited per recommendation
FDOT	BMSD	Support Doc	Page 106: The paragraph starting “The total estimated population for Hillsboro Pines...” is the exact same text as page 99. It is recommended one of the two sections be removed and the corresponding figures (Figures 36 and 37) be placed side by side or consecutively to provide better context on the existing demographics in North County.	Comment noted - will consider for future updates.
FDOT	BMSD	Support Doc	Page 86: Figure 22 presents the Central County Hispanic/Latino origin by race. The figure shows non-Hispanic African Americans representing 94.7% of the population, and the text shows African Americans of all origins represent 97% of the population. Presumably, the additional 2.3% of missing population in the figure comes from African Americans of Hispanic origin. It is recommended either the text better reflect the supporting figure by stating the values as shown or an additional figure representing race alone be added for better context.	Comment noted - will consider for future updates.

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FDOT	Housing	H	<p>General: (linkages to Transportation Element)</p> <ul style="list-style-type: none"> •Include additional analysis and policies to note the role of transportation in overall household costs. Without affordable housing located near reliable transit, these costs greatly increase for low-income households. Consider a measure such as “transportation as a share of household costs” to show how location of affordable housing influences household transportation costs. •Consider including measures which indicate proximity to transit, and percentage of jobs accessible by transit and automobiles. •Housing type section includes information on the breakdown of single-family versus multi-family housing. Consider including some analysis on the location of affordable multi-family housing, which can indicate additional demand or prioritization for transit service. •Incorporate mapping that shows location of existing affordable housing and concentrations of cost-burdened households. 	<p>The Broward County Housing Element only pertains to the unincorporated area (Broward Municipal Services District). These areas are highly served by transit and have a large percentage of affordable units. For instance, Broadview Park is served by BCT routes 9, 18, 30, and 441, Central County is served by BCT routes 9, 11, 22, 31, 36, 40, and 81, and North County is served by BCT route 19. Other related recommendations resulted in changes to some of the policies to reflect these linkages. See more in responses to other Housing recommendations below.</p>
FDOT	Housing	H1.5	<p>Page 485: Policy H1.5: In discussion of locating housing near “premium” transit, consider including additional detail on this classification. Potential “premium” transit includes factors related to reliability and frequency.</p>	<p>BCLUP Policy 2.16.3 specifies that bonus density can be granted to affordable housing constructed within 1/4 mile of a bus stop with 5 or more buses per hour in peak service and/or 1/2 mile from a passenger rail station.</p>
FDOT	Housing	H3.1	<p>Page 486: Policy H3.1 in discussion of land banking, discuss future high-capacity transit planning as a factor for locating land bank sites. Land acquisition strategies near these planned transportation investments can preempt rising land costs which can be a barrier to development of affordable housing in these significant areas.</p>	<p>The following changes are being proposed: POLICY H3.1 Broward County shall encourage land acquisition and land banking, <u>prioritizing those sites accessible to existing and planned transit service, when feasible</u>, to subsidize the development of affordable housing projects.</p>
FDOT	Housing	H3.3	<p>Page 487: Policy H3.3: Voters approved creation of a Housing Trust Fund in 2018. This goal and supporting materials can be rephrased to indicate how the funds will be planned and distributed, including in relation to providing access and mobility.</p>	<p>Policy language that addresses the passage of the Housing Trust Fund incorporated into the Housing Element.</p>
FDOT	Housing	H5.3	<p>Page 488: Policy H 5.3: HUD Mandated Small Area Fair Market Rent has been suspended. Analysis is important and should not be removed as a policy goal, but remove description of HUD Mandate, and consider moving to another policy goal, perhaps under area 1, that discusses more broadly the importance of deconcentrating poverty.</p>	<p>Per recommendation the reference has been deleted. Policy was not moved from the current location.</p>
FDOT	Housing	Support Doc	<p>Page 398: The planning horizon in the introduction section states that long-term planning horizon for the Housing Element will be 2030; however, the text following Table H-1 reflects a planning horizon of 2045. It is important to frame decisions within the proper context and do so consistently throughout the planning process.</p>	<p>Planning horizon changed to 2045.</p>

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FDOT	Housing	Support Doc	<p>Page 397: In context of Best Practices considerations:</p> <ul style="list-style-type: none"> •Location recommendation should include services (in addition to employment and retail). •Considerations regarding public transportation should be recommended near planned future transit (in addition to existing public transportation service). Land acquisition strategies for planned transportation investments can preempt rising land costs which can be a barrier to affordable housing development. •Location recommendations should also emphasize siting affordable housing in or near “high opportunity areas” as well as throughout Broward County. A focus on geographic diversification will also aid in promoting access to high-opportunity areas and deconcentrating poverty. 	The Broward County Housing Element only pertains to incorporated land (Broward Municipal Services District). These areas are highly served by transit and have a large percentage of affordable units. For instance, Broadview Park is served by BCT routes 9, 18, 30, and 441, Central County is served by BCT routes 9, 11, 22, 31, 36, 40, and 81, and North County is served by BCT route 19. Also, a focus on specific siting criteria and/or geographic diversification is not applicable since the planning and acquisition of affordable housing sites are under the purview of each individual municipality. Generally, the recommendations do not apply to our jurisdiction's context.
FDOT	Housing	Support Doc	Page 399: In context of generational demand for “micro-units”, include discussion of the importance of pairing this development with public transportation choices. When dense housing options are located closer to core destinations (including employment, services, and retail), policies should consider reducing or eliminating parking minimums, which will allow more space for housing (and lower housing costs).	Micro-units have recently become a market response to local housing needs. They are not "generational", since they provide a solution for people of all ages who have a need for housing and are not able to afford anything larger. In reference to parking, the variance process allows the review of parking requirements on a case by case basis, until such time as the County determines that the lower requirements can be codified.
FDOT	Housing	Support Doc	Pages 401 and 424: Absent here is a discussion of how the age of housing stock influences affordability. The availability of this aging housing stock represents the largest share of “naturally-occurring” affordable housing and is the focus of housing preservation efforts (listed as a policy goal).	Edited per recommendation
FDOT	Housing	Support Doc	Page 428: This section of comparisons between BMSD and Broward County does not include a comparison between cost-to-income and rent-to-income ratios in these respective areas.	Comment noted- will consider for future updates.
FDOT	Housing	Support Doc	Page 436: H-C: Pairing with graph on population forecast by age, include discussion of aging-in-place trends and associated implications for housing and transportation. This trend removes some of the “filtering” housing from the overall share of affordable housing, and also creates transportation challenges (i.e. increase in demand for paratransit) among seniors.	Comment noted- will consider for future updates.
FDOT	Housing	Support Doc	Page 401: The text in the paragraph under ‘Housing Age in the BMSD’ reads “between 1950 and 1999, when 67.3 of the housing stock was constructed.” It is recommended the word “percent” be added after “67.3”.	Edited per recommendation
FDOT	Housing	Support Doc	Page 437: Use “Mobile Home Parks” versus “Mobile Homes Parks”	Edited per recommendation
FDOT	Capital Improvements	Support Doc	Page 71: the text discussing the proposed “one cent” sales tax should be updated to reflect that the tax was passed and how it will be used and/or distributed. A policy could indicate the timeframe for when such a plan will be prepared.	Broward County will edit CI5.3 and add policy language in the Capital Improvements and Transportation Elements that reflects the recent passage of the 1-cent Charter County and Regional Transportation System Surtax. See new policy CI1.14 and amended T3.1.
FDOT	Capital Improvements	Support Doc	Page 67: Under section C the text suggests “solar powered” vehicles are reducing revenues from gas taxes. It is recommended that “electric” be used instead of “solar powered” since it is more inclusive of applicable technologies.	Edited per recommendation
FDOT	Intergov	IC7.7	Page 498: Policy IC7.7 lists several government agencies that will help to create, develop, and implement a suite of planning tools for climate change mitigation and adaptation. Most of the policies in this section include state agencies, but this one does not. Given FDOT’s role in providing technical information and resources, it would be appropriate to include FDOT or state agencies in this policy, too.	Edited per recommendation POLICY IC7.7 Broward County shall continue to collaborate with municipalities, neighboring counties, and <u>regional and state agencies</u> , other as well as regional public and private entities to create, develop, and implement a suite of planning tools for climate change mitigation and adaptation.

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FDOT	Intergov	Support Doc	Page 447: The Capital Improvements Element bullet on transportation does not include the key partners of FDOT and the Broward MPO. Generally, this table seems to exclusively list agencies and departments under Broward County jurisdiction. However, inter-governmental coordination includes coordination outside of Broward County and listing the importance of local, state, and federal cooperation, particularly regarding transportation planning, is appropriate.	This section of the Intergovernmental support document is specific to Broward County operated services within the service area. Coordination with other state, regional, and/or federal agencies, as appropriate, are listed through individual policies in the Intergovernmental Element and across other elements.
FDOT	Conservation	C	Page 427, the following links are not available: <ul style="list-style-type: none"> •County Green Building Policy: http://www.broward.org/Facilities/Pages/LEEDSBuildings.aspx •Property Assessed Clean Energy (PACE) Program http://www.broward.org/Climate/EnergyAndSustainabilityProgram/Pages/PACE.aspx 	Thank you. Broward County will repair the broken hyperlinks prior to final publication online.
FDOT	Conservation	Support Doc	Page 201 describes a reduction of VMT in addressing air quality concerns. After the recession, VMT started increasing again. Also, while per capita VMT may fall over time, given projected population and employment growth, it is possible VMT will continue to increase. A reference to the Climate Change Element GHG emissions and transportation discussion would be helpful.	There is a thorough discussion of VMT and air quality metrics related to transportation in the Transportation Element Support Document. See "Data and Analysis, D. Environmental and Health Impacts."
FDOT	Conservation	Support Doc	Traffic congestion is a major factor in air quality. Broward County may want to consider including a traffic congestion reduction aspect of the county's effort, listing BCTED, the Broward MPO, and FDOT as coordinating partners.	Transportation Element Policy T2.5.2 address transportation strategies to reduce GHG and improve air quality. Actions to improve traffic operations are outlined in this policy.
FDOT	Port	DWP	The support documents for the Deepwater Port element seem to be out-of-sync with the goals, objectives, and policies. It states that revisions will be required after the Port Everglades Master Plan is updated. The introduction references the 2011 Port Everglades Master/Vision Plan which is not the most recent. On the Port Everglades website there is currently the 2014 plan available, and the 2018 plan will be released soon if not already. Until the 2018 plan is available, it is recommended that the support material reflect the 2014 plan or indicate why the 2011 plan is the source.	As explained in the introduction, the Deepwater Port Component will be updated as part of the current Master/Vision Plan process. This includes the GOPS and Support Document. Broward County expects an update to the Deepwater Port Component to be initiated shortly after adoption. This update will reconcile the discrepancies between the plan horizon year and data/analysis in the support document.
FDOT	Port	DWP	Page 268: Under the General Description section the same 3 to 5 sentences are repeated several times. It is recommended that this paragraph be revisited and modified to read smoothly.	Edited per recommendation
FDOT	Port	DWP	Page 271: The planning horizon section may have been copied from a previous year's iteration of the support document (possibly 2009 or 2010) and shows years incompatible with its being 2018.	As explained in the introduction, the Deepwater Port Component will be updated as part of the current Master/Vision Plan process. This includes the GOPS and Support Document. Broward County expects an update to the Deepwater Port Component to be initiated shortly after adoption. This update will reconcile the discrepancies between the plan horizon year and data/analysis in the support document.
FDOT	Natural Disaster	ND	Natural disaster planning traditionally emanates from emergency management agencies, and FEMA through its All Hazards trainings has been encouraging increased collaboration among disciplines. Broward County may want to consider enhancing the objectives and policies in this element, as well as support materials, to include transportation planning and maintenance agencies. Objectives ND5, ND6, and ND7 are ones to consider for initial integration of transportation and coordination with transportation partners. Similarly, SR A1A is under FDOT's authority so coordination with FDOT regarding any infrastructure improvements will be needed, such as was the case after a segment of the roadway in Fort Lauderdale was damaged by waves from Hurricane Sandy and high tides in 2012.	Planning and Development Management will coordinate with EOC on potential future edits to the Natural Disaster Component.

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FDOT	Natural Disaster	Support Doc	A hyperlink in this section is not functioning: •Page 505: Fix link for Enhanced Local Mitigation Strategy: http://cragenda.broward.org/docs/2017/CCCM/20171212_553/25739_Broward%20County%20ELMS_FINAL%20September%202017.%20updated2c.%20313%20pages.pdf	Will be fixed prior to post adoption final publication online.
FDOT	Climate Change	CC	Several hyperlinks in this section are not functioning: •Page 397: "Resolution 2007-391" link broken •Page 397: Broken link: "Climate Change Action Plan - Local Strategy to Address •Page 392: Global Climate Change" http://www.broward.org/Climate/Documents/BrowardCAPReport2015.pdf •Page 397: Broken link "Unified Sea Level Rise Projection" http://www.southeastfloridaclimatecompact.org/wp-content/uploads/2015/10/2015-Compact-Unified-Sea-Level-Rise-Projection.pdf •Page 131: Fix link for Green Infrastructure Map Series: http://www.broward.org/Climate/Toolbox/Pages/Green-Infrastructure.aspx	Thank you. Broward County will repair the broken hyperlinks prior to final publication online.
FDOT	Climate Change	CC1.8	Page 401: Policy CC1.8 In discussion of walkable development, also emphasize the importance of transit-oriented development (TOD). Walkability within a mixed-use community encourages short, local pedestrian trips, but TOD further reduces vehicle miles traveled (VMT) and greenhouse gas emissions by encouraging residents to take transit for longer trips.	We believe the reference is to Policy CC1.7. Added "help reduce greenhouse gas emissions" to the policy.
FDOT	Climate Change	CC1.9	Page 402: Policy CC1.9 In policy discussion related to reduced fuel consumption, also include transportation demand management programming, such as partnerships with employers that incentivize carpooling, transit ridership, or telecommuting. Furthermore, Broward County should consider coordinating with the Broward MPO on an agreed upon long-term GHG emission reduction goal.	Policies in Transportation Element Objective T2.5 directly address transportation strategies to reduce GHG and increase the County's resilience to the impacts of climate change. Additionally, Policy T4.5.6 directly supports South Florida Commuter Services/Florida 511.
FDOT	Climate Change	CC4.1	Page 408: Policy CC4.1 Other benefits of trees, gardens, etc., are that these elements create a more pleasant environment for bicycling and walking.	Utilizing landscaping to provide for a more pleasant environment for bicycling and walking is a strategy outlined in the Transportation Element T1.1.5(13) and T1.1.8.
FDOT	Climate Change	CC1.5	Page 400: Policy CC1.5 In discussion of alternative fuels and electric vehicles, the more common term is "autonomous" versus "automated" vehicles.	Both terms are used in the industry. For instance, FDOT is a partner in the annual "Florida Automated Vehicles Summit".
FDOT	Climate Change	Support Doc	Page 97: Quality Walking Environment: Emphasize the importance of pedestrian network connectivity. Gaps in connectivity and poor sidewalk maintenance are serious barriers to walkability.	Support for pedestrian connections can be found in the Transportation Element Support Document. Strategies to enhance the pedestrian experiences are outlined in the Transportation Element T1.1.5.
FDOT	Climate Change	Support Doc	Page 106: In context of discussing transportation's share of the GHG inventory, emphasize that status quo dependence on vehicular travel is a major driver for these emissions. Policies supporting more multi-modal transportation choices along with a supportive land use/development pattern will reduce this share, and this link should be referenced directly (especially since no programs are directly devoted to transportation). However, the long-term impact of transportation networking companies and autonomous vehicles and VMT are unknown.	There is a thorough discussion of VMT and air quality metrics related to transportation in the Transportation Element Support Document. See "Data and Analysis, D. Environmental and Health Impacts."
FDOT	Climate Change	Support Doc	Page 129: Study on economic value of at-risk beaches uses a 1998 cost impacts. Have any newer studies been completed?	Check with Nicole Sharp in EPCRD. See pg. 43, 3rd paragraph 1997 study reference.
FDOT	Climate Change	Support Doc	Page 133: In context of environmental justice and public health, the terms "low-income" or "underserved" communities (versus "poor" and "marginalized") are frequently used.	Edits made per recommendation. See 2nd parag. pg. 47 of CC SD;
FDOT	Recreation and Open Space	R1.5	Page 532: Policy R1.5 This policy (regarding complete streets and safe park access) should emphasize how recreational systems are part of an overall multi-modal network, and what level of coordination is needed to ensure that integration.	As described in T1.1.1, Park and Recreation is a member of the County "interdepartmental and interdisciplinary" Complete Streets Team that review all county complete streets projects.

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FDOT	Recreation and Open Space	R2.3	Page 533: Policy R2.3 For this policy, given the County's emphasis on multimodal transportation, consider including a "transit-shed" regarding access to cultural community facilities in addition to a measured 25-minute vehicular travel shed. Walking and biking access also could be included.	Comment noted - will consider for future updates.
FDOT	Recreation and Open Space	Support Doc	Several hyperlinks in this section are not functioning: <ul style="list-style-type: none"> •Page 562: Fix link for Broward County Museum and Galleries http://www.broward.org/arts3/Resources/Publications/MuseumGuide/files/assets/basic-html/page-1.html#n •Page 562: Fix link for Creative Broward plan http://www.broward.org/arts3/Resources/Publications/CulturalPlan2020/Documents/CreativeBroward2020PlanFinal10042010.pdf •Page 566: Fix link for Broward County Greenways Map to http://www.broward.org/PlanningCouncil/Documents/PotentialGreenwaysSystem.pdf 	Thank you. Broward County will repair the broken hyperlinks prior to final publication online.
FDOT	Recreation and Open Space	Support Doc	Page 570: Supply of parks is adequate to meet projected demand through 2045. Long-term planning horizon (p. 5) is 2030. Consider adjusting to 2045 to match these needs.	Comment Noted
FDOT	Recreation and Open Space	Support Doc	Pages 562-565: These pages note locations of local and regional parks. Related to Connectivity (2D), a map of the county parks with trails, bike lanes, and sidewalks would be very helpful to promote multimodal access and support the identification of infrastructure improvements.	Comment noted - will consider for future updates.
FDOT	Water Management	WM2.7	Page 593: Regarding Policy WM2.7 and development of models and climate data integration, Broward County should include the importance of data coordination and sharing with relevant agencies.	Comment Noted - Broward County coordinates data sharing with regional partners through the Climate Change Compact and the Water Advisory Board.
FDOT	Water Management	WM3.16	Page 597, of Exhibit 2, Policy WM3.16 states that: "No new solid-fill transportation facilities or similar structures, which contradict the efforts of the Federal Water Resources Development Act of 2000, and the Florida Everglades Forever Act, will be permitted within Broward County's water conservation areas, as defined in the Broward Municipal Services District (BMSD) Element, without provisions for maintaining the freshwater sheet flow." It is important that this policy not jeopardize improvements needed for mobility and regional economic development, particularly those supporting employment and freight movement in the US 27 corridor. The language on maintaining freshwater sheet flow should suffice in meeting environmental, economic development, and transportation needs.	We will consult with internal agency subject matter experts to discuss.
FDEO	Coastal Management	NA	No "Objections". See Technical Comments, below.	NA

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FDEO	Coastal Management	NA	<p>Technical Assistance Comment 1: The County should consider including in the BrowardNEXT2.0 plan, a single redevelopment component as a part of the Coastal Management Element(s). The principles in this component are the ones the County would use to eliminate inappropriate and unsafe development in the coastal areas when opportunities arise consistent with Section 163.3178(2)(f)1-6, F.S. requirements.</p> <p>"(f) A redevelopment component that outlines the principles that must be used to eliminate inappropriate and unsafe development in the coastal areas when opportunities arise. The component must:</p> <ol style="list-style-type: none"> 1. Include development and redevelopment principles, strategies, and engineering solutions that reduce the flood risk in coastal areas which results from high-tide events, storm surge, flash floods, stormwater runoff and the related impacts of sea-level rise. 2. Encourage the use of best practices development and redevelopment principles, strategies, and engineering solutions that will result in the removal of coastal real property from flood zone designations established by the Federal Emergency Management Agency. 3. Identify site development techniques and best practices that may reduce losses due to flooding and claims made under flood insurance policies issued in this state. 4. Be consistent with, or more stringent than, the flood-resistant construction requirements in the Florida Building Code and applicable flood plain management regulations set forth in 44 C.F.R. part 60. 5. Require that any construction activities seaward of the coastal construction control lines established pursuant to s. 161.053 be consistent with chapter 161. 6. Encourage local governments to participate in the National Flood Insurance Program Community Rating System administered by the Federal Emergency Management Agency to achieve flood insurance premium discounts for their residents." 	A new objective and policies will be added for the 2019 update.
FDEO	Coastal Management	Support Doc	<p>Technical Assistance Comment 2 The County should consider updating two definitions in the BrowardNEXT2.0 definitions section (Exhibit 3).</p> <ol style="list-style-type: none"> 1. "Coastal Construction Control Line (CCCL) - means the line established by the Florida Department of Natural Resources after a determination, through comprehensive engineering study and topographic survey, that the establishment of such control line is necessary for the protection of upland properties and the control of beach erosion, pursuant to Section 161.053, Florida Statutes (Broward County Land Use Plan, 2017)." The definition of Coastal Construction Control Line is now defined by the Florida Department of Environmental Protection instead of the Department of Natural Resources. 2. "Coastal High Hazard Area - An area of special flood hazard extending from offshore to the inland limit of a primary frontal dune along an open coast and any other area subject to high velocity wave action from storms or seismic sources {FEMA}. The evacuation zone for a Category 1 hurricane as established in the regional hurricane evacuation study applicable to the local government. Broward County has identified its Coastal High Hazard Area as the land and water eastward of the Atlantic intracoastal Waterway to the Atlantic Ocean." The definition of Coastal High Hazard Area should be updated to be consistent with Section 163.3178(2)(h), F.S., which specifies that the Coastal High Hazard Area is an area particularly vulnerable to the effects of coastal flooding from tropical storm events and is defined as the area below the elevation of the category 1 storm surge line as established by a Sea, Lake, and Overland Surges from Hurricanes (SLOSH) computerized storm surge model. The current definition in the comprehensive plan references evacuation area not the storm surge area. 	Comment noted - will consider for future updates.
FDEO	Coastal Management	Support Doc	<p>Technical Assistance Comment 3 The County could consider adding the definition of "Coastal Area" to the BrowardNEXT2.0 Plan's Coastal Management Support Document definitions section. The Plan currently defines the more limited Broward County, "Coastal Planning Area" but not the "Coastal Area" applicable to the overall Coastal Management Element and Peril of Flood planning as described by Sections 163.3164(8) and 163.3177(6)(g), F.S. Section 163.3164(8), F.S. of the Community Planning Act defines "Coastal area" to mean the 35 coastal counties and all coastal municipalities within their boundaries.</p>	Comment noted - will consider for future updates.

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AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FDEP	NA	NA	The Department conducted a detailed review that focused on potential adverse impacts to important state resources and facilities, specifically: air and water pollution; wetlands and other surface waters of the state; federal and state-owned lands and interest in lands, including state parks, greenways and trails, conservation easements; solid waste; and water and wastewater treatment. Based on our review of the submitted amendment package, the Department has found no provision that, if adopted, would result in adverse impacts to important state resources subject to the Department's jurisdiction.	N/A
SFWMD	Water Management	WM4.8	1.Revise Policy WM4.8 and/or Policy 1.11 in Exhibit 2, Resolution, and Exhibit 7, Water Management Comparison Element, to be consistent when referring to ocean outfall programs.	Edited per recommendation
SFWMD	Water Management	Support Doc	2. Revise Exhibit 3, 2018 Broward County Comprehensive Plan Support Documents, Conservation and Water Management Elements to change the term "Xeriscape" to "Florida Friendly Landscaping" to be consistent with Section 125.568, Florida Statutes (F.S.)	Edited per recommendation
SFWMD	Water Management	Support Doc	3.Revise Exhibit 3, 2018 Broward County Comprehensive Plan Support Documents, Water Management Element to change the following: <ul style="list-style-type: none"> •Paragraph 2 of the "Introduction A. General" section to reflect that the Lower East Coast Water Supply Plan Update was approved by the District's Governing Board on November 8, 2018. Pursuant to Section 163.3177(6)(3)c., F.S., a local government is required to revise its Work Plan within 18 months after approval of the Lower East Coast (LEC) Water Supply Plan Update by the District's Governing Board. Therefore, the County's Work Plan Update should be adopted by May 2020. The County will need to include a minimum of a ten year planning period, updated water demand projections, identify alternative and traditional water supply projects, and conservation and reuse activities needed to meet the projected future demands. Planning tools are available on the District's website for your use and District Staff are available to provide technical assistance to update the Work Plan, including reviewing draft Work Plans prior to formal plan amendment submittal. The planning tools are located at this link: https://www.sfwmd.gov/our-work/water-supply/work-plans. •Paragraph 1 of the "Potable Water A. Authority" section to clarify the type of approvals that the Broward County Health Department issues for private wells. 	Edited per recommendation
SFRPC	Water Management		Staff recommends that prior to adoption, the proposed amendments be revised to reflect that the Lower East Coast Water Supply Plan Update was approved by the District's Governing Board on November 8, 2018.	Edited per recommendation
SFRPC	Transportation	NA	Staff also recommends that prior to adoption of the proposed amendments, the County addresses the comments of the Florida Department of Transportation, specifically the LOS standards on the Strategic Intermodal System (SIS), including the local SIS connectors.	Edited per recommendation
FWC	Conservation, BMSD, Climate Change	NA	No objections or recommendations. Only editorial comments.	NA

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FWC	Conservation	C7.1	<p>Policy C7.1 - Please clarify the "Nongame Wildlife Program". This program does not exist within the FWC. The current Division of Habitat and Species Conservation may be more appropriate.</p> <p>From follow-up email: Hi Sara, the Division of Habitat and Species Conservation (HSC) is a Division within FWC that works with nongame wildlife. We were not sure whether the Nongame Wildlife Program that was referred to in your document was meant to be an FWC section/division, a funding program, or something else. If it's meant to be a division, we thought the right one would be HSC. Please let me know if you need further clarification or have other questions.</p>	Edited per recommendation
FWC	BMSD	BMSD Support Doc	<p>3. Wetlands</p> <p>There are four WCAs, 2-A, 2-B, 3-A, and 3-B, which are managed by the South Florida Water Management District (SFWMD) in Broward County...</p> <p>Suggest changing text to say the WCAs are managed jointly by SFWMD and the FWC.</p>	Edited per recommendation
FWC	BMSD	BMSD Support Doc	<p>3. Wetlands</p> <p>...The main functions of the WCAs are to provide flood protection, water supply, natural systems management, and water quality management.</p> <p>Suggest adding to the main functions of the WCAs: "providing fish and wildlife habitat and outdoor recreational opportunities."</p>	Edited per recommendation
FWC	Climate Change	Support Doc	Under "State and Federal Partners" Add the Florida Fish and Wildlife Conservation Commission. (pg. 57)	Edited per recommendation
FWC	Conservation	Support Doc	Listed Animal Species: The FWC is phasing out use of the State Species of Special Concern status. There will only be State Threatened species going forward. (pgs. 5, 16, 37, 52)	Comment noted. We will make changes once the program is phased out.
FWC	Conservation	Support Doc	Endangered Species: Add that the most recent list can be found in Chapter 68A-27.003 Florida Administrative Code	The reference was added in two locations, including Marine Habitats (pg. 16) and a table listing preservation efforts (pg. 69).
FWC	Conservation	Support Doc	<p>Appendix C-B:</p> <ul style="list-style-type: none"> •Change FGFWFC to FWC. (CE SD, pgs. 16 & 36) •Change FDA to FDACS.(CE SD, pgs. 52 and 69) •The listed species information should be updated, and some species are missing. For example, we know there are Florida burrowing owls in Broward, and likely other listed species. (several species added to pg. 51) •Please see Ch. 68A-27.003 for the most recent information regarding federal and state-listed animal species in Florida. (References updated on pgs. 16 & 69) •Additional Marine species information can be found in Ch. 379.2431. (Several references to CH. 372 updated to Ch. 379) •See Ch 5B-40 for state-listed plants. State-listed plants are under the authority of the FDACS not the FWC. (Changes on pg. 69) •Conversely, FDACS does not regulate state-listed animals. (Changed table title to Wildlife/Plant Preservation) •Federally, U.S. Fish and Wildlife Service is responsible for protecting land animals, plants, and freshwater fish, and the National Marine Fisheries Service within the National Oceanic and Atmospheric Administration is responsible for protecting marine species. (Added to bottom of table on pg. 70) 	Recommended changes made. See page numbers next to comments.
FWC	Conservation	Support Doc	Table: Change FDA to the FDACS, remove SSC, and the sources should be updated with current information. Due to recent changes in listed species, please see 68A-27.003 FAC for information regarding listed animals, and 5B-40.0055 FAC for plants.	Repeated comment. See changes referenced above.
FWC	Conservation	Support Doc	Florida Fish and Wildlife Conservation Commission Chapter 372, FS Control and management of state game lands is currently Chapter 379.	Repeated comment. See changes referenced above.

Policy Responses to Transmittal Comments

AGENCY	ELEMENT	POLICY	COMMENT	RESPONSE
FWC	Conservation	Support Doc	Table: The title of this table is Wildlife Preservation but some of the items are plant-related.	Repeated comment. See changes referenced above. Table title changed to include "Plants."
FWC	Conservation	Support Doc	Florida Department of Environmental Protection Chapter 370, FS Protection of marine turtles, manatees, porpoises, manta rays. Regulate saltwater fishing activities. The agency listed here should be the Florida Fish and Wildlife Conservation Commission, and the statutory reference should be Chapter 379.	Edited per recommendation
FWC	Conservation	Support Doc	a. Listed species. List needs to be updated with current information as some of these species are no longer listed, whereas others may have been added. Species scientific names should be in italics.	Some species added and italicized. None removed.
FWC	Water Management	Support Doc	Table containing the WCAs at the top of the page. The WCAs are listed with no information provided in the columns. The information is either missing or listing the WCAs here is a typo. Also, the 4th column throughout this table has a typo: change "Steg" to "Stage".	Typo corrected. Checking with EPCRD for updates to table.
DHR	Historic Preservation Component	NA	Letter of no objections or comments.	NA
DOE	Public School Facilities	NA	No comments received.	NA