



Florida Department of Transportation

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December 7, 2018

Ms. Josie Sesodia, Director
Broward County Planning and Development Management Division
115 South Andrews Avenue
Fort Lauderdale, FL 33301



Dear Ms. Sesodia:

**RE: Proposed Broward County Comprehensive Plan Amendment, DEO #18-5ESR
BrowardNext 2.0**

Thank you for allowing the Florida Department of Transportation an opportunity to review the proposed amendment. The Department has reviewed the proposed BrowardNEXT2.0 Comprehensive Plan with DEO reference #18-5ESR pursuant to Section 163.3184(3), Florida Statutes (F.S.) and in its role as a reviewing agency as identified in Section 163.3184(1)(c), F.S. Agency comments from the Department were transmitted to the County on November 29, 2018 via email. This letter shall serve as a more formal conveyance of the Department's comments.

The proposed amendment contains a completely revised and updated Comprehensive Plan and the Broward Municipal Services District (BMSD) Future Land Use Map series.

In accordance with ss. 163.3161(3) and 163.3184(3)(b), F.S., the focus of our review was on major transportation issues, including adverse impacts to transportation facilities of state importance. 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 Planning 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 ss. 163.3180(5)(h)1.a., F.S., to consult with the Department when proposed amendments affect facilities on the SIS.

FDOT is providing the following comments:

Comments:

1. 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

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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.

Resolution of Comment 1: FDOT supports Broward County's multimodal approach to meeting local and regional transportation needs. However, the County should revise Policy T2.3.3 to ensure that the Transportation Concurrency Management Process contained within the TCMA Table of Standards addresses impacts to SIS facilities by allowing the facilities to benefit from binding agreements relating to proportionate share contributions. Broward County should include reasonable LOS standards for roadways, namely LOS D for urban facilities and LOS C for rural facilities within the TCMA's. This would ensure consistency with the Department's LOS targets.

The County should revise Policy T2.3.3 to ensure that the TCMA Table of Standards is based on professionally accepted techniques for measuring levels of service.

2. 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.

Resolution of Comment 2: The County should amend the Capital Improvements Element and other portions of the Comprehensive Plan to better identify LOS deficiencies for roadways and transit and the projects necessary to ensure that any adopted level-of-service standards are achieved and maintained for the 5-year period by specifying their status as either funded or unfunded and given a level of priority for funding.

3. 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.

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Section	Horizon (2028 is 10 years)
BMSD Land Use	10-year
Capital Improvements	Based on other Elements (depending on capital needs)
Climate Change	10+ year (2050)
Coastal Management	10-year
Conservation	10-year
Deepwater Port	10-year
Historic Preservation	10-year
Housing	10+year (2030)
Natural Disaster	10+ year (2040)
Public Schools Facilities	10-year (2027)
Recreation	10+year (2030)
Transportation	10+year (2045 conforming to Broward MPO LRTP)
Water Management	10+ year (2040)

Resolution of Comment 3:

The County should coordinate the elements within the Comprehensive Plan across consistent time horizon years and revise data and analysis as necessary.

If these comments are not resolved prior to adoption, FDOT may request the State Land Planning Agency challenge the amendment pursuant to Section 163.3184(5), F.S.

In addition to the comment(s) above, FDOT is providing the following technical assistance comments consistent with Section 163.3168(3), Florida Statutes. The technical assistance comments will not form the basis of a challenge. The technical assistance comments are intended to strengthen the local government’s comprehensive plan to foster a vibrant, healthy community and are designed to better ensure consistency with the Community Planning Act in Chapter 163, Part II, F.S.

Technical Assistance Comments

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*

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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. Concurrency examples where these exist are:

- Miami-Dade County - LOS standards are provided for roads depending on whether transit is available and the type of transit provided and the geographic location (e.g., inside the urban infill area). For more information, see the Comprehensive Development Master Plan Transportation Element Policy TC-1B. <https://www.miamidade.gov/planning/library/reports/planning-documents/cdmp/transportation.pdf>
- Orange County - Traditional roadway LOS standards are defined, with relief from these standards provided in concurrency exception areas or alternate mobility areas (AMAs). There is also a requirement for minimum transit service (a minimum of 73,500 person trips per day). Provision of infrastructure/ services in AMAs is determined on a per-development basis. Of note is Orange County's performance measurement evaluation of the effectiveness of strategies, which include bike/ped/transit quality of service, vehicle miles traveled (VMT) reduction, pedestrian connectivity, accidents involving pedestrians or cyclists, and number of transit shelters. For more information, see the Comprehensive Plan Transportation Element <https://ocfl.app.box.com/s/2tmfw8g8qt7v2bnths5uvhvji4ly7ukj>.

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.

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:

~~"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:"

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

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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.

6. 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.
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 ~~FDOTs~~ multimodal Strategic Intermodal System as a ~~S~~statewide transportation and economic priority."

Policy T4.4.1 outlines multiple strategies to address regional connectivity. Several text enhancements are suggested: (Similar changes are recommended in the Support Document.)

- 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.: "Use of the Florida East Coast Railroad as an urban transit corridor" is listed as a strategy. However, it does not appear to be addressed elsewhere in the Comprehensive Plan as part of the Support Documents or in the policy language. The County should explain how this strategy is internally consistent with the Comprehensive Plan and strengthen the strategy by enhancing the Support Documents to include urban transit corridor information and additional policies as appropriate to guide implementation.

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- 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.

The Department can provide a map of SIS facilities in Broward County for insertion in the comprehensive plan if requested.

8. 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.
9. 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.
10. 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.
11. 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.

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12. 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:
 - 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.
13. 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:
 - 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.)

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- 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.
14. 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.

Additional Comments - Technical and Editorial

Transportation: Goals, Objectives, and Policies

15. 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.
16. 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).
17. The note in the Standard District table in Transportation Policy Element T2.3.3 refers to the "Quality/Level of Service Handbook published by the Florida Department of Transportation, 2012. "This handbook was replaced by the 2013 Quality/Level of Service Handbook posted at www.fdot.gov/planning/systems/programs/SM/los/pdfs/2013_QLOS_Handbook.pdf.
18. Page 542: Policies T1.1.3 and T1.1.4 encourage context sensitive implementation of Complete Streets and the Design, application, and placement of traffic control devices other than those adopted in the *Manual on Uniform Traffic Control Devices* (MUTCD) through requests for experimentation. FDOT has released the FDOT Design Manual (FDM) that applies a 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/>.
19. 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:

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- 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.
20. 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.
 21. 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 a potential rider’s decision to take transit.
 22. 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.
 23. 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.
 24. 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.
 25. 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.

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26. Pages 561-562, Policy T2.5.1: Does item 1. encompass Broward County's commitment to move to an all EV bus fleet?
27. 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.
28. 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.

Support Document

29. 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.
30. 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.
31. 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.
32. 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.

Land Use: Goals, Objectives, and Policies

33. 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.

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Support Document

34. Page 41: The Annexation of Enclaves first bullet states "...with between..." It is recommended to use either "with" or "between", not both.
35. 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.
36. 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.

Housing:

37. General: (linkages to Transportation Element)
 - 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.

Goals, Objectives, and Policies

38. 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.
39. 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.

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40. 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.
41. 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.

Support Document

42. 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.
43. Page 397: In context of Best Practices considerations:
 - 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.
44. 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).
45. 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).
46. 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.

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47. 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.
48. 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".
49. Page 437: Use "Mobile Home Parks" versus "Mobile Homes Parks"

Capital Improvements Element Support Document

50. 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.
51. 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.

Inter-Governmental Coordination Goals, Objectives, and Policies

52. 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.

Support Document

53. 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.

Conservation Element Goals, Objectives, and Policies

54. Page 427, the following links are not available:
 - 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>

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Support Document

55. 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.
56. 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.

Deepwater Port Support Document

57. 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.
58. 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.
59. 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.

Natural Disaster Goals, Objectives, and Policies

60. 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.

Support Document

61. A hyperlink in this section is not functioning:

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- 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

Climate Change Goals, Objectives, and Policies

62. 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>
63. 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.
64. 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.
65. Page 408: Policy CC4.1 Other benefits of trees, gardens, etc., are that these elements create a more pleasant environment for bicycling and walking.
66. Page 400: Policy CC1.5 In discussion of alternative fuels and electric vehicles, the more common term is "autonomous" versus "automated" vehicles.

Support Document

67. Page 97: Quality Walking Environment: Emphasize the importance of pedestrian network connectivity. Gaps in connectivity and poor sidewalk maintenance are serious barriers to walkability.
68. 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

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impact of transportation networking companies and autonomous vehicles and VMT are unknown.

69. Page 129: Study on economic value of at-risk beaches uses a 1998 cost impacts. Have any newer studies been completed?
70. Page 133: In context of environmental justice and public health, the terms “low-income” or “underserved” communities (versus “poor” and “marginalized”) are frequently used.

Recreation and Open Space Goals, Objectives, and Policies

71. 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.
72. 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.

Support Document

73. Several hyperlinks in this section are not functioning:
 - 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>
74. 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.
75. 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.

Water Management Element Goals, Objectives, and Policies

76. 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.

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77. 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.

Please ensure that Department's comments are made part of the public record and available to County officials. The Department requests that the County meet with Department staff to resolve the above comments prior to the adoption hearing. Please contact Mr. Larry Hymowitz at (954) 777-4663 or via email at larry.hymowitz@dot.state.fl.us after receipt of this correspondence to coordinate a meeting to discuss the Department's recommendations and technical assistance comments.

Sincerely,



Stacy L. Miller, P.E.
Director of Transportation Development
District Four

SM:lh

cc: Barbara Blake Boy, Executive Director – Broward County Planning Council
Isabel Cosio Carballo, Executive Director – South Florida Regional Planning Council
Jennifer Carver, Statewide Community Planning Coordinator - FDOT Central Office
Gerry O'Reilly, District Secretary – FDOT District Four
Richard Shine, Assistant General Counsel – FDOT Central Office
Henry Sniezek, Director – Broward County Environmental Protection & Growth Management Department
James Stansbury, Bureau Chief – Florida Department of Economic Opportunity
Gregory Stuart, Executive Director – Broward Metropolitan Planning Organization



Environmental Protection and Growth Management Department
PLANNING AND DEVELOPMENT MANAGEMENT DIVISION
115 South Andrews Avenue, Suite 329-K • Fort Lauderdale, Florida 33301 • Telephone 954-357-6634 • FAX 954-357-8655

VIA EMAIL

December 21, 2018

Stacy L. Miller, P.E., Director of Transportation Development
Florida Department of Transportation – District Four
3400 West Commercial Boulevard
Fort Lauderdale, FL 33309-6839

Dear Ms. Miller:

On October 9, 2018, the Broward County Board of County Commissioners voted to transmit amendments to the Broward County Comprehensive Plan—BrowardNEXT2.0 (DEO #18-5ESR). Per the expedited State review process, Planning and Development Management Division (PDMD) received no objections, three (3) Comments, and 74 technical assistance/other comments from Florida Department of Transportation (FDOT) on November 29, 2018.

In response to the three (3) Comments received from FDOT District Four, County staff is proposing additional changes to the Goals, Objectives, and Policies (GOPs) of the Transportation and Capital Improvements Elements prior to adoption. PDMD responses to comments are shown below and proposed amendments to the above-mentioned Elements are attached. The technical assistance/other comments in your letter have been reviewed by staff and incorporated as appropriate in the final document. However, since these items were not submitted as objections or Comments, staff will not provide a response to each individually.

FDOT Comment # 1

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.

PDMD Response

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.

FDOT Comment # 2

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.

PDMD Response

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.

FDOT Comment # 3

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.

<i>Section</i>	<i>Long (2028 is 10 years)</i>
<i>BMSD Land Use</i>	<i>10-year</i>
<i>Capital Improvements</i>	<i>Based on other Elements (depending on capital needs)</i>
<i>Climate Change</i>	<i>10+ year (2050)</i>
<i>Coastal Management</i>	<i>10-year</i>
<i>Conservation</i>	<i>10-year</i>
<i>Deepwater Port</i>	<i>10-year</i>
<i>Historic Preservation</i>	<i>10-year</i>
<i>Housing</i>	<i>10+year (2030)</i>
<i>Natural Disaster</i>	<i>10+ year (2040)</i>
<i>Public Schools Facilities</i>	<i>10-year (2027)</i>
<i>Recreation</i>	<i>10+year (2030)</i>
<i>Transportation</i>	<i>10+year (2045 conforming to Broward MPO LRTP)</i>
<i>Water Management</i>	<i>10+ year (2040)</i>

PDMD Response

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.

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.)

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.

PDMD staff appreciates the extensive review conducted by FDOT staff and the continued assistance to ensure the successful implementation of Broward County's Comprehensive Plan amendments under State expedited review 18-05ESR. Please be advised that adoption hearings before the Board of County Commissioners are being scheduled for February 12, 2019 and March 19, 2019. I trust that staff responses outlined above adequately address the Comments raised by FDOT. However, staff are available to meet if necessary. If you have further questions about BrowardNEXT2.0, please contact Sara Forelle at sforelle@broward.org.

Sincerely,

**JOSIE
SESODIA**

Digitally signed by
JOSIE SESODIA
Date: 2018.12.21
15:38:25 -05'00'

Josie P. Sesodia, AICP, Director
Broward County Planning and Development Management Division

Enclosures

cc/enc: James Stansbury, Bureau Chief, Florida Department of Economic Opportunity
Dan Pennington, Planning Analyst, Florida Department of Economic Opportunity
Mayur Patel, District Planning and Environmental Administrator, Florida
Department of Transportation
Larry Hymowitz, Planning Specialist, Florida Department of Transportation
Isabel Cosio Carballo, Executive Director, South Florida Regional Planning
Council
Maite Azcoitia, Broward County Deputy County Attorney
Darby Delsalle, AICP, Assistant Director, Planning and Development
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Sara Forelle, AICP, Planning Section Supervisor, Planning and Development
Management Division
Nicholas Sofoul, AICP, Senior Transportation Planner, Planning and
Development Management Division

JPS/ns