

## EXHIBIT 2

**SECTION I**  
**AMENDMENT REPORT**  
**BROWARD COUNTY LAND USE PLAN TEXT**  
**PROPOSED AMENDMENT PCT 19-2**

**“Commerce Permitted Uses”**

**RECOMMENDATIONS/ACTIONS**

**DATE**

- I. Planning Council Staff Transmittal Recommendation February 19, 2019*

It is recommended that the proposed amendment to the BrowardNext - Broward County Land Use Plan be approved. See Attachment 1.

This item is recommended for a second public hearing to ensure an additional comment period for interested parties.

This item will be presented to the Land Use/Trafficways Committee immediately preceding the Planning Council meeting. The Committee’s recommendation will be presented at the Planning Council meeting.

- II. Planning Council Land Use/Trafficways Committee Recommendation February 28, 2019*

Approval per Planning Council staff transmittal recommendation.

- III. Planning Council Transmittal Recommendation February 28, 2019*

Approval per Planning Council staff transmittal recommendation, including a second Planning Council public hearing. (Vote of the board; Unanimous: 13-0; Blackwelder, Blattner, Brunson, Castillo, Ganz, Gomez, Graham, Grosso, Hardin, Railey, Rich, Rosenof and Stermer)

**SECTION II**  
**AMENDMENT REPORT**  
**PROPOSED AMENDMENT PCT 19-2**

**BACKGROUND INFORMATION**

At its March 22, 2018 meeting, the Planning Council initiated a review of the Commerce and Residential land use designations to evaluate the potential for a category to address redevelopment of multi-use and mixed-use developments on a smaller scale, as opposed to utilizing the Activity Center designation. Subsequent to the Council's initiation the Broward County Board of County Commissioners reiterated the initiation, including the promotion of mixed-income/affordable housing opportunities at an April 17 workshop.

**PUBLIC OUTREACH**

Planning Council staff held a workshop on June 25 to discuss the foundation of the proposal. Local governments and interested parties were in attendance. In addition, a presentation was made on July 16 to the Broward Planning Director's Roundtable. Planning Council staff distributed the proposed amendment via email to all municipal mayors, managers and planners, as well as interested parties. See Attachment 2.

In an effort to encourage dialogue with municipalities and other interested parties, written comments have been and continue to be accepted regarding the proposed amendment. See Attachment 3 for all written comments received as of this writing. The comments and Planning Council staff responses can be found in the Planning Analysis Section of this report.

**SECTION III**  
**AMENDMENT REPORT**  
**PROPOSED AMENDMENT PCT 19-2**

**PLANNING ANALYSIS AND SUMMARY**

The proposed amendment to the permitted uses of the “Commerce” land use designation is intended to create further incentives for affordable dwelling units at the very-low (less than 50% of the area median income), low (less than 80% of the area median income) and moderate (less than 120% of the area median income) affordability levels. A map of the BrowardNext – Broward County Land Use Plan “Commerce” land use designations is included as Attachment 4.

The BrowardNext – Broward County Land Use Plan (BCLUP), as adopted in 2017:

- Created a new “Commerce” land use designation which was the result of streamlining and combining the non-residential business categories (i.e. Commercial, Industrial, Employment Center and Office Park) into a single land use designation; and
- Transitioned the allocation of “flexibility units” and/or “redevelopment units” from site-planning type regulations to a maximum of 10 acres on lands designated “Commerce” and up to 20 acres, if inclusive of an affordable housing component.

The proposed amendment can be summarized as follows:

- Maintains allocations of “flexibility units” and/or “redevelopment units” to a maximum of 10 acres on lands designated “Commerce”;
- Removes the requirement to allocate “flexibility units” and/or “redevelopment units” for developments of any size that include an affordable housing component restricted for a period of at least 15 years (i.e. residential permitted by right subject to the affordable housing component).

See Attachment 1.

Planning Council staff received the following comments regarding the proposed amendment:

**City of Miramar**

**Comment:** Residential Uses in Commerce Category: No objection other than providing some locational criteria, such as proximity to major transit corridors for subpart (d). See Attachment 3.A.

**Planning Council Staff Response:** Staff concurs and has updated the proposed text amendment to reflect transit access and location requirements similar to those adopted in the BCLUP as part of the “bonus density” requirements. The proposed amendment has been modified to clarify that transit service is defined as projects located within a ¼ mile of limited transit stop defined as no fewer than 5 buses or similar transit vehicle passing by in one hour. This clarification will focus these types of opportunities with direct access to transportation corridors such as State Road 7/U.S. 441, Federal Highway, University Drive, Broward Boulevard and Sunrise Boulevard. Planning Council staff will coordinate with Broward County Transit and will provide an updated map for the recommended second Planning Council public hearing.

## **PLANNING ANALYSIS AND SUMMARY (continued)**

### **Broward County Planning and Development Management Division**

**Comment:** This section of the Broward County Land Use Plan (LUP) includes uses allowed under each land use category. The amendment deletes the maximum amount of land allowed for residential use in the Commerce Use category, including the incentive if affordable housing is part of the allotment. The proposed amendment includes proximity to transit as a condition for residential uses. It then lists levels of affordable housing (15%, 10%, or 5%) allowed, but does not clarify whether these are requirements and what conditions they are associated with. In order to ensure predictable development decisions consistent with Policy 2.20.8, the PDMD staff recommends the policy state how to determine the amount of affordable housing that is required. See Attachment 3.B.

**Planning Council Staff Response:** Comment noted. Planning Council staff's interpretation of the proposed amendment is that the set-asides are defined with a sliding scale of income ranges and include minimum amounts for the very-low and low income categories.

**Comment:** The Broward County Land Use Plan's Affordable Housing Vision identifies the provision of affordable housing as a challenge due to numerous forces, including the built-out condition of Broward County and the prevalence of a service sector economy that provides lower wage jobs. These conditions are not expected to change in the foreseeable future. PDMD notes that the requirement that affordable housing remain affordable for 15 years is likely to offset affordable housing needs in the short-term but is not part of a long-term solution. See Attachment 3.B.

**Planning Council Staff Response:** Comment noted. The 15-year timeline is consistent with other adopted policies and uses in the BCLUP related to affordable housing, such as "bonus density."

### **Broward County Housing Finance and Community Redevelopment Division**

**Comment:** Need definition of contiguous to transit. Does the parcel literally need to touch a transit corridor? See Attachment 3.C.

**Planning Council Staff Response:** Staff concurs and has updated the proposed text amendment to reflect transit access and location requirements similar to those adopted in the BCLUP as part of the "bonus density" requirements. The proposed amendment has been modified to clarify that transit service is defined as projects located within a ¼ mile of limited transit stop defined as no fewer than 5 buses or similar transit vehicle passing by in one hour. This clarification will focus these types of opportunities with direct access to transportation corridors such as State Road 7/U.S. 441, Federal Highway, University Drive, Broward Boulevard and Sunrise Boulevard. Planning Council staff will coordinate with Broward County Transit and will provide an updated map for the recommended second Planning Council public hearing.

## **PLANNING ANALYSIS AND SUMMARY (continued)**

**Comment:** Even though this currently exists in some form, a requirement for some type of affordable or mixed income element should be introduced. There is not a single city the county that does not have one or more affordable income ranges that are under-served. See Attachment 3.C.

**Planning Council Staff Response:** Staff recognizes the affordability or mixed income element and is of the opinion that the proposed modification would create an incentive for affordable housing as the proposed language would permit residential by right if the affordable housing percentages are met, with no allocation of “flexibility units” and/or “redevelopment units” required.

### **City of Pompano Beach**

**Comment:** Pompano’s comment on these new policies relates to the elimination of the ability of local governments to use flex units on commercial properties greater than 10 acres that are building market-rate units. It is our preference that 11.d be amended for the Commerce policy to eliminate the language “On parcels up to 10 acres” so that local governments can retain their current authority to allocate flex units on any size parcel with a commercial (Commerce) land use regardless of whether or not affordable housing is being provided. As you know, Pompano requires in our zoning code that all flex unit allocations include affordable housing unless the Applicant provides a buy-out of the affordable housing requirement for any project building market-rate flex units. The proposed policy would eliminate that right. See Attachment 3.D.

**Planning Council Staff Response:** BrowardNext – Broward County Land Use Plan was adopted in 2017 with a maximum acreage limitation of 10 acres for parcels that do not have a deed restricted affordable housing component. The proposed text amendment does not change that condition and staff modified the strike-through/underline format of the text amendment to more clearly reflect that the 10-acre limitation is not proposed but existing. Further, the proposed amendment does create two (2) incentives for affordable housing opportunities:

- 1) No acreage limitation for parcels with restricted affordable dwelling units; and
- 2) Permits residential as a right without local requirement to allocate “flexibility units” or “redevelopment units.”

### **Florida Department of Transportation**

**Comment:** Paragraph “a.” allows Residential uses in the Commerce use if there is some affordable housing and it is on parcels located contiguous to transit service. Could contiguous also mean “served by” or “accessible to”? See Attachment 3.E.

**Comment:** What degree of transit service is sufficient? Should there be a premium transit service, certain minimum headways, access to more than one route? One route with marginal headways may not be sufficient to support affordable housing. See Attachment 3.E.

## **PLANNING ANALYSIS AND SUMMARY (continued)**

**Planning Council Staff Response:** Staff concurs and has updated the proposed text amendment to reflect transit access and location requirements similar to those adopted in the BCLUP as part of the “bonus density” requirements. The proposed amendment has been modified to clarify that transit service is defined as projects located within a ¼ mile of limited transit stop defined as no fewer than 5 buses or similar transit vehicle passing by in one hour. This clarification will focus these types of opportunities with direct access to transportation corridors such as State Road 7/U.S. 441, Federal Highway, University Drive, Broward Boulevard and Sunrise Boulevard. Planning Council staff will coordinate with Broward County Transit and will provide an updated map for the recommended second Planning Council public hearing.

### **Conclusion**

Planning Council staff recommends approval of the proposed amendment. See Attachment 1. Further, staff recommends a second Planning Council public hearing.

**SECTION IV**  
**AMENDMENT REPORT**  
**PROPOSED AMENDMENT PCT 19-2**

**ATTACHMENTS**

1. Proposed Amendment PCT 19-2
2. Email Correspondence to all Municipal Mayors, Managers and Planners, as well as Interested Parties
3.
  - A. Correspondence from the City of Miramar dated November 20, 2018
  - B. Correspondence from the Broward County Planning and Development Management Division dated November 28, 2018
  - C. Correspondence from the Broward County Housing Finance and Community Redevelopment Division dated December 5, 2018
  - D. Correspondence from the City of Pompano Beach dated January 2, 2019
  - E. Correspondence from the Florida Department of Transportation dated January 25, 2019
4. BrowardNext – Broward County Land Use Plan Map depicting “Commerce” land use designation

# ATTACHMENT 1

## PROPOSED BROWARDNEXT – BROWARD COUNTY LAND USE PLAN TEXT AMENDMENT PCT 19-2

### COMMERCE USE (BCLUP PERMITTED USES)

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11. Residential uses, as follows:

- a. On parcels located contiguous to transit service that include a minimum of 15% affordable housing (consisting of at least 3% very-low income and 5% low income with remaining percentage at any affordable housing income level) restricted to such use for a minimum of 15 years; or,
- b. On parcels located contiguous to transit service that include a minimum of 10% affordable housing (consisting of at least 4% very-low income, and 6% low income) restricted to such use for a minimum of 15 years; or,
- c. On parcels located contiguous to transit service that include a minimum of 5% very-low income affordable housing restricted to such use for a minimum of 15 years; or,
- d. On parcels up to 10 acres (~~up to 20 acres for projects that include a minimum of 15% affordable housing restricted to such use for a minimum of 15 years~~), are permitted via local government allocation of “flexibility units” and/or “redevelopment units,” provided that total residential uses do not exceed 20% of the land area designated “Commerce” or equivalent land use designation within the municipality.

Areas east of the Intracoastal Waterway are limited to a maximum of 25 dwelling units per acre and are not permitted to utilize “redevelopment units.” Compatibility with existing and planned uses shall be addressed by the local government.

Contiguous to transit service is defined as within a ¼ mile of limited transit stop defined as no fewer than 5 buses or similar transit vehicle passing by in one hour.

Units of local government may utilize the above provisions regardless of whether such provisions are incorporated within their certified local land use elements.

Note: Proposed additions and deletions are presented in underline and ~~strike-through~~ format. Double-underlined words are additions based on stakeholder comments.



## ATTACHMENT 2

**From:** Blake Boy, Barbara

**Sent:** Monday, November 19, 2018 5:27 PM

**To:** Von Stetina, Deanne <DVONSTETINA@broward.org>

**Subject:** Proposed BrowardNext - Broward County Land Use Plan Text Amendments

(Please note that this email is being sent to all municipal mayors, managers and planners, as well as interested parties.)

Greetings--

At its March 22, 2018 meeting, the Planning Council initiated a review of the Commerce and Residential land use designations to evaluate the potential for a category to address redevelopment of multi-use and mixed-use developments on a smaller scale, as opposed to utilizing the Activity Center designation. Subsequent to the Council's initiation the Broward County Board of County Commissioners reiterated the initiation including the promotion of mixed-income/affordable housing opportunities at an April 17 workshop. The following proposed amendments are a result of that initiation and subsequent initiation at the October 25, 2018, Planning Council meeting:

**PCT 19-2:** Revision of Commerce land use designation permitted uses to include a mixed-income formula for parcels with direct access to transit corridors with frequent transit service (may be further refined to be similar to bonus density provisions definition of transit service as well as consideration of penny surtax plan).

**PCT 19-4:** Proposed land use designation to accommodate smaller mixed-use areas.

**PCT 19-5:** Revision of the Residential land use designation permitted uses to include "Accessory Dwelling Units," for affordable units, as permitted by and consistent with Florida Statutes Chapter 163.

**PCT 19-6:** Revision of the Residential land use designation permitted uses and *Administrative Rules Document: BrowardNext*, Article 3.5(3), to expand mixed residential and retail sales or offices for densities greater than 25 dwelling units per acre.

The attached files are labeled by amendment reference.

Planning Council staff requests written comments be submitted by January 4, 2019, as a Planning Council public hearing is proposed for January 24, 2019. Thank you for your continued assistance and collaboration. Please feel free to contact me or Deanne Von Stetina ([dvonstetina@broward.org](mailto:dvonstetina@broward.org) or 954.357.6690) if you have any questions.



Wishing you all a happy and safe Thanksgiving holiday—  
Barbara

**Barbara Blake Boy**, Executive Director

115 South Andrews Avenue, Room 307  
Fort Lauderdale, Florida 33301  
954.357.6982 (direct) [www.Broward.org/PlanningCouncil](http://www.Broward.org/PlanningCouncil)

Attached Files: PCT 19-2, PCT 19-4, PCT 19-5 and PCT 19-6

## ATTACHMENT 3.A.

**From:** [Lebrun, Nixon](#)  
**To:** [Blake Boy, Barbara](#)  
**Cc:** [Silva, Eric B.](#); [Hughes, Richard](#)  
**Subject:** Proposed BrowardNext - Broward County Land Use Plan Text Amendments  
**Date:** Tuesday, November 20, 2018 6:57:49 PM  
**Attachments:** [image017.png](#)

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Good afternoon Barbara,

Following is a list of comments I would like to offer on the proposed BCLUP Amendments your office has shared with us.

1. Residential Uses in Commerce Category: No objection other than providing some locational criteria, such as proximity to major transit corridors for subpart (d).
2. Accessory Dwelling Units in all Residential Categories: No objections as that would help alleviate the affordability housing shortage and is in line with Sec. 163.3177, F.S.
3. Office and Retail Sales of Merchandises in Medium- and High-Density Residential Categories: I have some reserve on that amendment, as proposed, and, for that matter, subparagraph (9) altogether. The benefits of integration of uses in a single development from both a land use and sustainability standpoint are well documented in the literature. However, in cities like ours where affordable housing is an issue and where the amount of land available for medium- to high-density residential uses is relatively small, allowing commercial uses in such districts may well hinder our efforts to address the affordable housing crisis, as that may take away suitable land to create more housing units, raise the price of such land, and, ipso facto, drive up the cost of building affordable housing units. I can understand limiting accessory retail sales and services uses to the first floor in the forms of convenience stores, drop-off dry cleanings, and the likes, but, as written, the policy is too permissive.
4. Mixed-Use Village: I think this category shall be restricted to major thoroughfares and on sites of five (5) acres or more to provide for excellence in design and a functional integration of uses. Mixed Uses shall require three (3) uses, with residential development being a required one.

Warm regards,

**Nixon Lebrun, AICP, MPA, CFM**

Senior Planner | Community & Economic Development Department  
City of Miramar | 2200 Civic Center Place, Miramar, FL 33025  
O: 954.602.3281 | F: 954.602.3497 | [nlebrun@miramarfl.gov](mailto:nlebrun@miramarfl.gov)  
Hours: M – Th., 7am – 6pm, F – Closed | [www.miramarfl.gov](http://www.miramarfl.gov)  
*It's Right Here In Miramar... And So Are You!*



## ATTACHMENT 3.B.



Environmental Protection and Growth Management Department

### PLANNING AND DEVELOPMENT MANAGEMENT DIVISION

115 S. Andrews Avenue, Suite 329-K, Ft. Lauderdale, FL 33301 T: 954-357-6634 F: 954-357-8655

## MEMORANDUM

**TO:** Barbara Blake Boy, Executive Director  
Broward County Planning Council

**FROM:** Josie P. Sesodia, AICP, Director  
Planning and Development Management Division

**DATE:** November 28, 2018

**SUBJECT:** Proposed PCT 19-2, 19-4, 19-5, 19-6



The Planning and Development Management Division (PDMD) staff have reviewed the above-referenced amendments and offer the following comments:

### A. PC 19-2: Application of Residential Flex within the Commerce Future Land Use Designation

1. This section of the Broward County Land Use Plan (LUP) includes uses allowed under each land use category. The amendment deletes the maximum amount of land allowed for residential use in the Commerce Use category, including the incentive if affordable housing is part of the allotment. The proposed amendment includes proximity to transit as a condition for residential uses. It then lists levels of affordable housing (15%, 10%, or 5%) allowed, but does not clarify whether these are requirements and what conditions they are associated with. In order to ensure predictable development decisions consistent with Policy 2.20.8, the PDMD staff recommends the policy state how to determine the amount of affordable housing that is required.
2. The Broward County Land Use Plan's Affordable Housing Vision identifies the provision of affordable housing as a challenge due to numerous forces, including the built-out condition of Broward County and the prevalence of a service sector economy that provides lower wage jobs. These conditions are not expected to change in the foreseeable future. PDMD notes that the requirement that affordable housing remain affordable for 15-years is likely to offset affordable housing needs in the short-term but is not part of a long-term solution.

### B. PC 19-4: Mixed-Use Village

1. The proposed Mixed-Use Village future land use designation offers opportunities for redevelopment on a smaller scale than Activity Centers. Allowable uses include housing, retail, office, recreation, community facility, and "employment". It is unclear what types of uses would be classified as employment and if industrial uses would be considered employment uses. PDMD recommends deleting "employment" since it is encapsulated in the terms that follow.
2. In an Activity Center future land use designation, it is generally accepted that short-term land use incompatibilities among adjacent properties may occur as the land use pattern within a large area evolves into a balanced and interconnected mix of uses. However, the Mixed-Use Village is specifically intended to be site-specific and apply to places such as aging shopping

centers and strip malls. These sites often are located adjacent to low density residential uses that may be exposed to potential "incompatibilities". PDMD reviews future land use map applications for compatibility with the environs. PDMD recommends that compatibility be defined for Mixed-Use Village in relationship with surrounding uses.

3. The Mixed-Use Village requires uses to be mixed vertically or horizontally within the same building. PDMD recommends that horizontal mixed uses be allowed within separate buildings located on a property under single ownership, where the site design will promote pedestrian connectivity between uses, for example shared parking, building placement with direct pedestrian access, etc.

#### **C. PC 19-5: Accessory Dwellings**

The proposed amendment references that accessory dwellings are subject to the requirements of Chapter 163.31771, Florida Statutes. This statute requires an applicant to provide an affidavit with the building permit application that states the unit will be rented in an affordable category. Each accessory dwelling unit applies toward the affordable housing component of the local Housing Element. PDMD recommends that the Administrative Rules Document be amended to require municipalities to include these units in the required annual report to the Broward County Planning Council.

#### **D. PC 19-6: Medium-High Density Residential**

PDMD has no comments regarding this proposed amendment.

Please contact Sara Forelle, AICP, Planning Section Supervisor at [sforelle@broward.org](mailto:sforelle@broward.org) or 954-357-6635 should you have any questions.

CC:

Darby Delsalle, AICP, Assistant Director, Planning and Development Management Division  
Heather Cunniff, AICP, Senior Planner, Planning and Development Management Division



# ATTACHMENT 3.C.

## PROPOSED BROWARDNEXT – BROWARD COUNTY LAND USE PLAN TEXT AMENDMENT PCT 19-2

### COMMERCE USE (BCLUP PERMITTED USES)

Highlighted comments submitted by  
Broward County Housing Finance and  
Community Redevelopment Division  
dated December 5, 2018

11. Residential uses, as follows: up to 10 acres (up to 20 acres for projects that include a minimum of 15% affordable housing restricted to such use for a minimum of 15 years), are permitted via local government allocation of “flexibility units” and/or “redevelopment units,” provided that total residential uses do not exceed 20% of the land area designated “Commerce” or equivalent land use designation within the municipality.

a. On parcels located contiguous to transit service that include a minimum of 15% affordable housing (consisting of at least 3% very-low income and 5% low income with remaining percentage at any affordable housing income level) restricted to such use for a minimum of 15 years; or,

**\*\*\*NOTE: need definition of contiguous to transit. Does the parcel literally need to touch a transit corridor? Hopefully not.**

b. On parcels located contiguous to transit service that include a minimum of 10% affordable housing (consisting of at least 4% very-low income, and 6% low income) restricted to such use for a minimum of 15 years; or,

c. On parcels located contiguous to transit service that include a minimum of 5% very-low income affordable housing restricted to such use for a minimum of 15 years; or,

d. On parcels up to 10 acres, via local government allocation of “flexibility units” and/or “redevelopment units,” provided that total residential uses do not exceed 20% of the land area designated “Commerce” or equivalent land use designation within the municipality.”

**\*\*\*NOTE: even though this currently exists in some form, a requirement for some type of affordable or mixed income element should be introduced. There is not a single city the county that does not have one or more affordable income ranges that are under served.**

Areas east of the Intracoastal Waterway are limited to a maximum of 25 dwelling units per acre and are not permitted to utilize “redevelopment units.” Compatibility with existing and planned uses shall be addressed by the local government.

Units of local government may utilize the above provisions regardless of whether such provisions are incorporated within their certified local land use elements.

Note: Proposed additions and deletions are presented in underline and ~~strike-through~~ format.

## ATTACHMENT 3.D.

**From:** [Jean Dolan](#)  
**To:** [Blake Boy, Barbara](#)  
**Cc:** [Jennifer Gomez](#); [Daniel Keester](#); [Maggie Barszewski](#); [Kerrie MacNeil](#); [David Recor](#)  
**Subject:** RE: Proposed BrowardNext - Broward County Land Use Plan Text Amendments  
**Date:** Wednesday, January 2, 2019 9:56:09 AM

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Hi Barbara – Pompano’s comment on these new policies relates to the elimination of the ability of local governments to use flex units on commercial properties greater than 10-acres that are building market-rate units. It is our preference that 11.d be amended for the Commerce policy to eliminate the language “On parcels up to 10-acres” so that local governments can retain their current authority to allocate flex units on any size parcel with a commercial (Commerce) land use regardless of whether or not affordable housing is being provided. As you know, Pompano requires in our zoning code that all flex unit allocations include affordable housing unless the Applicant provides a buy-out of the affordable housing requirement for any project building market rate flex units. The proposed policy would eliminate that right.

Our suggested changes to the proposed policy is as follows:

11.d. ~~On parcels up to 10-acres, via~~ Via local government allocation of “flexibility units” and/or “redevelopment units”, provided that total residential uses do not exceed 20% of the land area designated “Commerce” or equivalent land use designation within the municipality.

Thanks,  
Jean

## ATTACHMENT 3.E.

**From:** Hymowitz, Larry <[Larry.Hymowitz@dot.state.fl.us](mailto:Larry.Hymowitz@dot.state.fl.us)>

**Sent:** Friday, January 25, 2019 1:03 PM

**To:** Blake Boy, Barbara <[BBLAKEBOY@broward.org](mailto:BBLAKEBOY@broward.org)>

**Cc:** Teetsel, Dawn <[DTEETSEL@broward.org](mailto:DTEETSEL@broward.org)>; Bush, Lois <[Lois.Bush@dot.state.fl.us](mailto:Lois.Bush@dot.state.fl.us)>; Fasiska, Christine <[Christine.Fasiska@dot.state.fl.us](mailto:Christine.Fasiska@dot.state.fl.us)>; Pietrowski, Jayne <[Jayne.Pietrowski@dot.state.fl.us](mailto:Jayne.Pietrowski@dot.state.fl.us)>; Merritt, Larry <[Larry.Merritt@dot.state.fl.us](mailto:Larry.Merritt@dot.state.fl.us)>

**Subject:** RE: Proposed BrowardNext - Broward County Land Use Plan Text Amendments

Please accept the following comments for the proposed Broward County Land Use Plan amendments.

Thank you for the opportunity to review.

### Mixed Use Village

1. The third paragraph indicates that a Transit Village must be served by neighborhood transit stations.
  - a. It is not clear what it means to be “served”. Does it mean accessible? Should it be on site? Within a certain distance? Recommend meeting with BCT to discuss. FDOT (Planning and Office of Modal Development) can participate as requested.
  - b. It is also not clear what constitutes a transit station. Is it more than a bus stop? Does it need to have certain features/functionality? Recommend meeting with BCT to discuss. FDOT (Planning and Office of Modal Development) can participate as requested.
2. The fourth paragraph indicates that the Mixed Use Village promotes integrated mixed use. The second bullet is confusing. It discusses having horizontal mixed use in the same building but attached. Is there a difference between vertical and horizontal mixed use if it is in the same building? Most horizontal mixed uses are discouraged in an urban form that’s representative of an urban infill area and a transit oriented context.

### Commerce Use

3. Paragraph “a.” allows Residential uses in the Commerce use if there is some affordable housing and it is on parcels located contiguous to transit service. There is ambiguity similar to above for the Mixed Use Village.
  - a. Could contiguous also mean “served by” or “accessible to”?
  - b. What degree of transit service is sufficient? Should there be a premium transit service, certain minimum headways, access to more than one route? One route with marginal headways may not be sufficient to support affordable housing.

### Residential Use

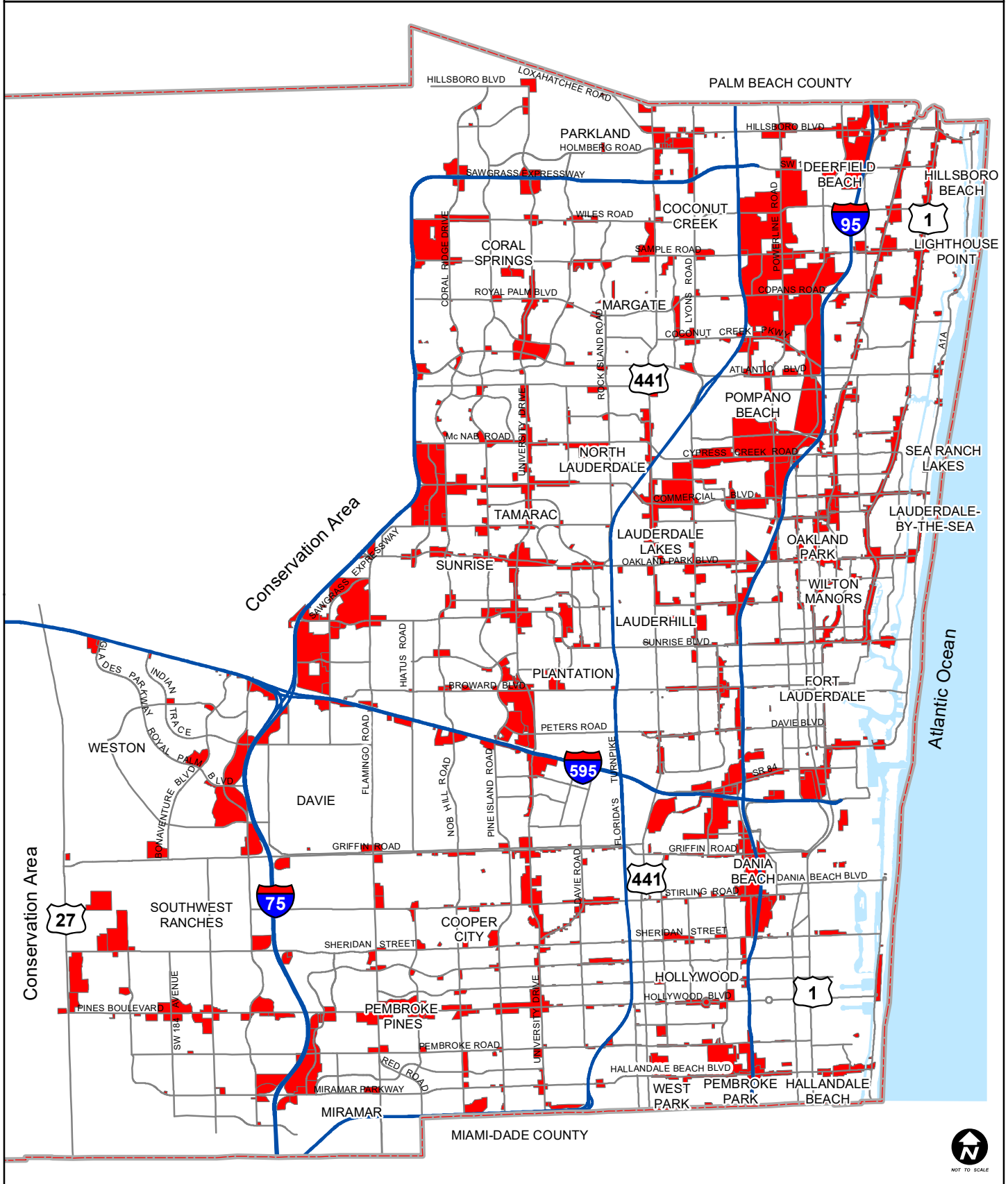
4. 9f on page 2 allows for up to 30% of the parcel area to be used for offices and/or retail uses where density is 25 d.u./acre or higher. There is no indication if these non-residential uses are integrated or are stand-alone. If there is an expectation or desire that these uses be integrated, it is suggested that clarification be provided.



Larry Hymowitz  
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# ATTACHMENT 4

## BROWARDNEXT - BROWARD COUNTY LAND USE PLAN LANDS DESIGNATED COMMERCE AMENDMENT PCT 19-2



NOT TO SCALE