Memorandum MIAMI DADE



June 9, 2022 Date:

To: Honorable Chairman Jose "Pepe" Diaz

and Members, Board of County Commissioners

Daniella Levine Cava
Mayor

Advilla Levine Cava From:

Mayor

Subject: Resolution No. R-967-19: Updated Report Analyzing Potential Impacts to Miami

International Airport from Proposed Development on the International Links

Melreese Country Club - Directive No. 220288

Executive Summary

At the September 4, 2019, Board of County Commissioners (Board) meeting, the Board adopted Resolution No. R-967-19, directing the County Mayor or County Mayor's designee to prepare a report analyzing the potential impacts to Miami International Airport (MIA) from a mixed-use development on 131.07 acres of land on the International Links Melreese Country Club (Melreese Country Club), which is owned and operated by the City of Miami. The mixed-use development potentially includes a 25,000 seat soccer stadium and other ancillary commercial uses such as: offices, restaurants, hotels, and conference facilities. The Resolution references potential impacts to traffic, road closures, aviation and airport operations, Federal Aviation Administration (FAA) requirements, commercial and environmental impacts, and costs to MIA to mitigate such impacts. In response to the directive issued, the Miami-Dade Aviation Department (MDAD), the Regulatory and Economic Resources Department (RER), and the Transportation and Public Works Department (DTPW) prepared a report dated February 22, 2021 that was placed on the March 2021 Board agenda for review under Legistar No. 210420.

At the February 15, 2022 Board meeting, a motion was adopted directing the Administration to bring up to date the original report placed on the March 2021 agenda. For that reason, MDAD, RER and DTPW prepared the report below which updates Board members as to the most recent actions taken by Miami Freedom Park, LLC (MFP LLC), the developer of the proposed mixeduse development, to address the impacts identified by the County in the original February 2021 report, which were based on the conceptual site plan submitted to the County by MFP LLC. Since that time, the MFP LLC has committed to work with the County staff and address any potential impacts described in the February 2021 report, provide any pending studies, and comply with all regulatory requirements. Now that the "Ground Lease and Master Development Agreement" for the Melreese Country Club was approved by the City of Miami Commission on April 28, 2022, MFP LLC will begin to finalize the development site plans and the design drawings, and take the appropriate subsequent steps, including but not limited to, all required federal, state, County, and local regulatory approvals necessary for the implementation of the project. Once the site plans are finalized, County staff will be in a position to better analyze the short and long-term potential impacts of this redevelopment project. Below is a summary of the concerns listed in the February 2021 Report and updates to these concerns as of April 2022.

February 22, 2021 Report

In the February 2021 report, MDAD pointed out that four of the proposed GPS coordinates in the conceptual drawings for the soccer stadium, as submitted to MDAD, did not comply with the Miami-Dade County Code, because they do not meet the County's height restrictions. Other aviation concerns included impacts to MIA's Outer Safety Zone, the Critical Approach Zone, and the 65-74 DNL Noise Compatibility Zone. Additionally, MDAD expressed concern with other issues, including but not limited to: (i) possible visual impacts to pilots and air traffic controller personnel resulting from lighting and glare; (ii) the possible airspace conflicts with helicopters, blimps, drones, and banner tower operations from the use of lasers and fireworks; and (iii) aircraft operational impacts during construction by the use of cranes within the arrival and departure paths of MIA's longest runway.

With respect to environmental matters, RER noted in that report that any on-site contamination at the Melreese Country Club, and any off-site contamination that originated from the Melreese Country Club, requires review and approval from RER's Division of Environmental Resources Management (DERM) to ensure the proper handling or disposal of contaminated material. Furthermore, any proposal for expansion or redesign of the site's stormwater management system also requires DERM's review and approval.

DTPW raised concerns in the report over the traffic impacts of the mixed-use development, as the June 2019 traffic study submitted to DTPW is based on traffic data collected in 2018, which does not accurately reflect today's traffic patterns and traffic volumes. Therefore, DTPW recommended that MFP LLC prepare a new detailed study. To date, an updated traffic study has not been submitted for review.

Update to February 22, 2021 Report

At the February 15, 2022 Board meeting, a motion was adopted directing the Administration to bring up to date the original report placed on the March 2021 agenda. In response to the Board's directive, MDAD, RER and DTPW prepared an update, which consists of the different actions taken by MFP LLC to further develop the preliminary site plan initially submitted to the County in 2019. During this past year, priority has been given to the "Ground Lease and Master Development Agreement". Because the City of Miami's Commission approved the lease on April 28th, MFP LLC will now proceed to finalize the development site plans and the design drawings and begin seeking the necessary federal, state, County and local regulatory approvals required to construct a development site that will include: a new public park, a state-of-the-art soccer stadium, food and beverage stores, offices, a hotel and conference center, and other commercial uses.

Miami-Dade Aviation Department (MDAD)

A. Aviation and Airport Operations Impacts and FAA Considerations – Exhibit A

MDAD's updated report is based on the most recent printed information made available to the public through a Special Area Plan Concept Book, which was published on June 20, 2020, and updated on May 7, 2021. It can be viewed at: https://miamifreedompark.com. The update includes information, provided by MFP LLC's legal counsel that was coordinated and drafted in response

to the various concerns MDAD raised regarding the construction of the proposed mixed-use development and its impacts to MIA.

Background

On November 27, 2019, the Capitol Airspace Group, an airspace consultant for MFP LLC, submitted an application for an MDAD-issued "Preliminary Airspace and Land-Use Letter of Determination," which consisted of 8 GPS points for the soccer stadium, based on a preliminary conceptual development site plan for the Miami Freedom Park Development. It is important to point out that MFP LLC is required to re-submit to MDAD an application for an MDAD-issued "Airspace and Land-Use Letter of Determination" once the design of the stadium, as well as other development contemplated under the Miami Freedom Park progresses or is finalized. The application should be submitted as a package which includes the site and architectural elevation plans for the proposed stadium as well as its ancillary development. Similarly, other development contemplated under the Miami Freedom Park, such as parking garages, office buildings, hotels, etc., will be required to file with the Aviation Department for their own Airspace and Land-Use Determination letters. The Capital Airspace Group also filed separately with the FAA for an FAA-issued "Airspace Determination Letter," but the FAA application consisted of 17 GPS points, representing additional points on the soccer stadium as well as the stadium's top-mounted light poles.

Because the Miami Freedom Park Development construction would impact an airport facility or necessitate a change in aeronautical operations or aircraft procedures, the FAA required a "Public Notice", which was issued on June 16, 2020 in the form of a letter and distributed or "circulated" to interested parties for comment. Three of the 17 points had no impacts on the airspace, so to avoid issuing 14 separate public notices for each structure point, the FAA issued only one public notice describing the entire project with the aeronautical effects for the entire project.

In a letter sent to the FAA dated July 14, 2020, MDAD objected to 7 of the 14 points that MFP LLC filed with the FAA on November 23, 2019 for review, because the proposed maximum heights at those points do not comply with the Miami Dade County Code (Code); more specifically, those points violate the County's Height Zoning Code, which does not allow for a variance. See §§ 33-335, 33-338(D), County Code (showing that subject property is outside the Height Variance Eligible Area). On September 10, 2020, MFP LLC's legal counsel requested a copy of MDAD's objection letter, which was provided on the same date.

On September 28, 2020, the FAA issued a "Determination of No Hazard to Air Navigation", to MFP LLC, which stated that the proposed soccer stadium had impacts to certain Standard Instrument Approach Procedures. Even though the FAA acknowledged certain penetrations, it determined that the proposed soccer stadium "qualifies as a low, close-in penetration" requiring "Take-Off Minimum and (Obstacle) Departure Procedures." The FAA mitigates these penetrations by noting these as "obstructions" in aircraft departure procedures and specifies that airlines should implement appropriate departure procedures to avoid these penetrations. The FAA remains neutral and does not object to the construction of the soccer stadium by relying on the airlines to avoid obstructions. However, it should be noted that the County has the authority, which it has exercised through the above-referenced Airport Zoning Code among other regulations, to impose stricter standards to prevent impacts to airport operations.

April 2022 Update

As a result of MDAD's in-depth review of the aeronautical study that Capital Airspace Group submitted to MDAD on November 27, 2019, MDAD prepared the comments below with respect to the proposed mixed-use development's potential operational and safety impacts. MFP LLC's legal counsel attempted to address MDAD's comments in a letter dated April 1, 2020 and through other email correspondence. MDAD's major concerns, in conjunction with those of MIA's airline partners and air cargo carriers and the actions taken or commitments made MFP LLC in response to the Department's concerns, are noted below. The documentation including the April 1, 2020 letter is attached as part of Exhibit A to this memorandum.

1. MDAD Comment

- Compliance with Miami-Dade County Code in that four of the eight GPS Coordinates (submitted to MDAD) of the proposed stadium would be too high and penetrate the obstacle clearance surfaces described in the Code, in addition, they would also penetrate the standard departure surfaces prescribed by the FAA.
- Response The April 1, 2020 letter recognizes that the four GPS Coordinates that would have been too high have been redesigned (i.e., reduced) to bring the stadium into compliance with the new, more restrictive height requirements of the Airport Zoning Code (chapter 33, article XXXVII, County Code). MDAD has corroborated this statement. The revised design plan with the new GPS Coordinates for the proposed soccer stadium have been submitted to the City of Miami for review and approval. Furthermore, MDAD was advised by the MFP LLC that they filed an application for an extension of the September 28, 2020 FAA Determination with revised GPS points that now comply with the County's most restrictive local regulatory requirements, because it expired on March 28, 2022.

2. MDAD Comment

- Compliance with the compatibility criteria specified in the Miami-Dade County Code as it relates to land use within three different zones, the Outer Safety Zone, the Critical Approach Zone and the 65-74 DNL Noise Compatibility Zone.
 - A. The Outer Safety Zone prohibits new residential construction, as well as the construction of educational facilities (excluding aviation-related schools and structures used in connection with public transportation), buildings for public assemblage, hospitals, and religious facilities. Because the stadium is a building for public assemblage, it must be located outside the Outer Safety Zone. The preliminary sketch submitted shows that the soccer stadium is located adjacent and slightly encroaching into the Outer Safety Zone. A revised sketch included as part of the Special Area Plan Concept Book indicates that the soccer stadium is now outside of the Outer Safety Zone. In addition, structures depicted south of the soccer stadium, referred to as the "Soccer Village," which consist of shopping, dining, and entertainment facilities, fall directly within the Outer Safety Zone. Should the use of those structures be considered for public assemblage, those structures and uses may be prohibited. The Code does not

permit variances from these restrictions in the Outer Safety Zone. See § 33-333(A)(1)(b)(ii), County Code.

- Response The April 1, 2020 letter states that the location of the soccer stadium has been repositioned away from the Outer Safety Zone and now complies with the existing regulations. Nevertheless, upon MDAD's request, the floor plans, inclusive of all corridors, circulation, and ancillary spaces for the proposed soccer stadium, will be submitted to MDAD for review once they are available.
- B. The Critical Approach Zone prohibits construction of hospitals, stand-alone emergency rooms, skilled nursing facilities, adult day care facilities, day nurseries, and educational facilities (excluding aviation-related schools) and uses that emit smoke, gases, or dust in quantities sufficient to jeopardize the safe use of MIA. The Code does not permit variances from these restrictions in the Critical Approach Zone. See § 33-333(A)(1)(c), County Code. The proposed development site is partially contained within this Zone.
- Response: The April 1, 2020 letter does not address these issues. A response is pending.
- C. The 65-74 DNL Noise Compatibility Restriction Zone dictates that all new uses shall incorporate at minimum a 25-decibel outdoor-to-indoor noise level reduction into design and construction. See § 33-333(A)(2)(b), County Code. The proposed development site is fully contained within this Zone.
- Response The April 1, 2020 letter asserts that federal noise abatement standards will be met as the site plans are further developed, and that the 25-decibel outdoor to indoor "Noise Level Reduction" required by the applicable County Code section will be incorporated into the design.

3. MDAD Comment

- Visual impacts to pilots and air traffic control personnel resulting from lighting and glare from the proposed stadium, practice fields, and other associated support facilities.
- Response The April 1, 2020 letter states that a lighting and glare proposal will be prepared with MDAD input, to ensure that potential glare emanating from reflective surfaces is studied and mitigated.

4. MDAD Comment

- Reduction in MIA's air traffic capacity due to potential airspace restrictions due to proposed stadium heights.
- Response: The April 1, 2020 letter states that MFP LLC has revised the soccer stadium plan to reduce its height and bring it into compliance with the Airport Zoning Code's height requirements.

5. MDAD Comment

- Airspace conflicts with helicopters, blimps, drones, and banner tower operations associated with the proposed stadium and its uses.
- Response: The letter dated April 1, 2020 does not address this issue specifically, however, the letter does stipulate that MFP LLC will submit a Restrictive Covenant Running with the Land that addresses the relevant points of concerns including the helicopters, blimps, drones, etc. MDAD has not received a draft copy of this Restrictive Covenant and, as such, MDAD has not confirmed whether its terms adequately address the issues.

6. MDAD Comment

- Aircraft operational impacts during the prolonged construction due to the presence of cranes within the arrival and departure paths of MIA's longest runway, Runway 9-27.
- Response The April 1, 2020 letter stipulates that MFP LLC will be required to file FAA Form 7460-1, which will set forth detailed plans related the project's use of construction cranes, and a construction crane plan will be submitted to MDAD for review and coordination prior to any construction crane installation. Furthermore, any proposed structure planned in the final development site plan in proximity to Runway 9-27 will need to obtain its own building permit. As such, at the time of building permit, the appropriate procedures will be followed for final site plan approval and compliance for construction activities in this area.

7. MDAD Comment

- Conflicts with aircraft operations due to the use of lasers and pyrotechnics during stadium activities and events.
- Response: The April 1, 2020 letter does not address this issue specifically, but it does stipulate that MFP LLC will submit a Restrictive Covenant Running with the Land that addresses the relevant points of concerns, including the use of lasers and pyrotechnics. MDAD has not received a draft copy of this Restrictive Covenant and, as such, MDAD has not confirmed whether its terms adequately address the issues.

8. MDAD Comment

- Impact to FAA's communications or navigation facilities, including but not limited to radio coverage, radio transmissions, and electrical interference of navigational aids. These impacts would be discovered after construction is completed and would be resolved at the expense of the developer.
- Response: The April 1, 2020 letter does not address this issue specifically, but it does stipulate that MFP LLC will submit a Restrictive Covenant Running with the Land that addresses the relevant points of concerns, including any impacts to FAA's communications or navigational facilities. MDAD has not received a draft copy of this Restrictive Covenant and, as such, has not confirmed whether its terms adequately address the issue.

As stated in the February 2021 report, MDAD is not able to quantify the costs that it would incur to mitigate the various impacts described herein. However, MFC LLC would need to consider a design and development budget for any mitigation they would be responsible for.

Finally, as stated previously, because the "Ground Lease and Master Development Agreement" was approved by the City of Miami Commission on April 28, 2022, MFP LLC will begin to finalize the development site plans and the design drawings, and take the appropriate subsequent steps, including but not limited to, all required federal, state, County, and local regulatory approvals necessary for the implementation of the project.

B. Commercial Impacts - Exhibit B

Based on the information regarding the Miami Freedom Park Development available online at https://miamifreedompark.com with respect to the commercial/retail developments planned, the site potentially includes a hotel and a conference center with 750 rooms and a mix of food, beverage, and retail in an area estimated to total approximately 600,000 square feet. Additionally, a pedestrian bridge is under consideration that will connect to the Miami Intermodal Center (MIC), which will facilitate transportation to the Miami Freedom Park Development from multiple forms of transportation modes that connect at the MIC, including Metrorail, TriRail, Metrobus, City Trolley, the Car Rental Center, the Taxi Center and Amtrak, a long-distance train service, which is also going to open at the MIC.

The customer base for an on-site airport hotel is primarily the traveling public. These hotels serve as a transfer point in a passenger's greater travel plans for a short-term connection or a longer stay before they reach their destination. By contrast, special event participants choose hotel properties with easy access to the city and more amenities than an airport property. MIA is moving forward with a Request for Proposals (RFP) for the development of a new 350-400 room hotel to be built by a private developer connected to MIA's North Terminal, with meeting space of 25,000 square feet in which modern technology can be installed. This will offset most of the impact of a new hotel at the Miami Freedom Park Development for small to midsize meetings, but the development site may still compete for some of the larger meetings and conferences.

The food and beverage and retail impacts to MIA are very difficult to assess due to the limited data currently available on specific tenants planned for the commercial development. The effect on post-security food and beverage and retail should be minimal because most domestic passengers have a limited time to shop and eat and most prefer doing these activities in the post security area of the Terminal. These passengers are not typically customers of a new shopping area off-airport grounds on the day of their travel. For international travelers who want to shop or eat a meal in Miami before they depart and have several extra hours, there is the possibility that they may utilize the new retail spaces for eating or shopping prior to arriving at the airport or leaving MIA while waiting several hours for a connecting flight, which could have a minimal impact to spending at the airport. Having a connection via a pedestrian bridge over the canal from the Miami Freedom Park Development to MIA from the MIC could make it easier for future passengers to stop at the development site prior to a flight several hours later. Also, it is unknown if a shuttle service to MIA will be provided by the retail complex at Miami Freedom Park Development to encourage use of their commercial facilities prior to going to MIA or waiting many hours for a connecting flight from MIA.

To better understand in more detail the financial impact to MIA, more information on the planned retail, and food and beverage venues at Miami Freedom Park Development is required. The current website shows an estimated 600,000 square feet of commercial space, but there is no breakdown at this time for the specific types of uses. Once this information is made available, MDAD can isolate the planned venues and services at the Miami Freedom Park Development (off-airport) versus the on-airport (MIA) concession program.

Regulatory and Economic Resources Department

C. Environmental Impacts – Exhibit C

The proposed development site has documented on-site solid waste, as well as soil and groundwater contamination. At this time, DERM has no record of off-site contamination associated with the subject site. But if additional site assessment activities reveal off-site contamination impacts that originate from the above referenced site, the City (as the party responsible for site rehabilitation) will be required to address and remediate those off-site impacts. Furthermore, due to the existing on-site solid waste and soil contamination, any redevelopment of the subject site will require further coordination with DERM. Any plans for proposed redevelopment will require prior DERM review and approval to ensure proper handling and disposal of contaminated material. This will include conditions for proper site management to ensure hazardous materials (solid waste and contaminated soils) are not allowed to impact off-site properties, including but not limited to the MIA property. On August 14, 2019 and December 13, 2019, respectively, MFP LLC submitted a supplemental site assessment report and a Conceptual Site Rehabilitation Plan (SRP) to DERM. The conceptual plan outlined the proposed actions, to be conducted concurrently with the proposed site development, that would ensure that the construction and operation of the proposed development will be protective of human health and the environment. DERM provided comments to the proposed plan and provided additional requirements in a response to the Conceptual SRP in a letter dated December 23, 2019. DERM requires that the final SRP be submitted for review and approval prior to site development activities

Any proposal for stormwater system improvements expansion or redesign at the subject site (e.g., during any proposed development) will also require DERM review and approval. At that time, DERM technical staff will conduct a thorough review to ensure that any proposed stormwater system modifications comply with County Code and that applicable regulations are adhered to and that discharges will not disperse the groundwater contaminate plume to offsite properties. Additionally, such stormwater improvements will require groundwater monitoring to verify that no off-site dispersion of said contaminates occur.

Transportation & Public Works Department

D. Traffic & Road Closures – Exhibit D

After review of the Miami Freedom Park and Soccer Village Traffic Study (Study) dated June 2019, the Transportation & Public Works Department (DTPW) expressed concern with a number of factors in the Study including but not limited to: 1) the Study area is limited to the vicinity of the site, 2) the traffic data for the Study was collected in 2018 while the SR 836/Dolphin Expressway was undergoing construction in the vicinity of the Study, 3) the Study showed lower traffic counts at on- and off-ramps from SR 836 on LeJeune Road and those in the vicinity of the Miami Intermodal Center compared to the historical Florida Department of Transportation (FDOT) traffic count data, 4) 10 of the 28 intersections in the Study area are approaching capacity under existing conditions and/or future conditions, and 5) traffic volumes from FDOT Traffic Online website indicates that SR-836/Dolphin Expressway in the Study area is approaching capacity. Based on these concerns and others outlined in DTPW's report attached in Exhibit D, it was concluded that insufficient information has been provided in the Study to address the concerns of the Board as stated in Resolution No. 967-19; rather, DTPW recommends that a new detailed study encompassing a larger area would need to be prepared by the developer since much of the study depends on the scope and intensity of the development they are proposing.

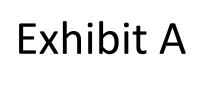
As of April 2022, a new, independent traffic study has not been submitted for review by the applicant or through MDAD. A virtual meeting was held April 6, 2022 with Miami-Dade County Chief Operations Officer, Jimmy Morales, and representatives of the new development, MDAD, RER and DTPW. At that meeting, DTPW staff reminded the applicant that the directive does not address all the County departments or DTPW's standard review items. DTPW encouraged the applicant to go through the RER municipal preapplication process as the site must demonstrate compliance with several items regarding connectivity to and from the site, including site plan reviews, internal and external circulation for the proposed right-of-way layout of the adjacent roads and proposed ramps, and pedestrian connectivity. The applicant acknowledged and understood that formal submittals for County departmental reviews are required.

Pursuant to Ordinance No. 14-65, this memorandum shall be placed on a Board meeting agenda for review.

Jimmy Morales

Chief Operations Officer

C: Geri Bonzon-Keenan, County Attorney
Gerald Sanchez, First Assistant County Attorney
Jess McCarty, Executive Assistant County Attorney
Office of the Mayor Senior Staff
Ralph Cutié, Director, Miami-Dade Aviation Department
Yinka Majekodunmi, CPA, Commission Auditor
Basia Pruna, Director, Clerk of the Board
Jennifer Moon, Chief, Office of Policy and Budgetary Affairs
Eugene Love, Agenda Coordinator







Date:

April 20, 2022

To:

Ralph Cutié

Director of Mlami-Dade Aviation Department

From:

José A. Ramos, R.A., LEED AP

Division Director Aviation Planning, Land-Use & Grants

Miami-Dade Aviation Department

Subject:

Proposed Miami Freedom Park Stadium - Revised Survey Elevation Analysis

The Aviation Planning, Land-Use and Grants Division is in receipt of the attached revised survey dated April 13, 2022 from Schwebke-Shiskin & Associates, which includes specific GPS locations and architectural elevations for the proposed Miami Freedom Park soccer stadium. The stadium is to be located on a portion of the 131-acre City of Miami owned Melreese Golf Course and Country Club which is roughly bounded by NW 42 Avenue, NW 14 Street, NW 37 Avenue and South of NW 21 Street. The address on file is 1400 NW 37 Avenue in Miami, Florida.

In an e-mail to MDAD on March 31, 2022, the applicant's attorney stated that the proposed stadium has been modified to have a maximum elevation of 120 feet Above Mean Sea Level (AMSL). According to the attorney, the plans are filed with the City of Miami and are accessible at www.miamifreedompark.com.

Please be advised that the revised survey dated April 13, 2022 from Schwebke-Shiskin & Associates includes thirty-three (33) points at specific GPS locations with elevations which range from 105 – 112 feet AMSL. The site elevation for each point was not provided. Since the maximum elevation for each point was expressed *in feet AMSL* on the survey, it is assumed that the site elevation was factored in and that the overall maximum elevation for the stadium will not exceed 112 feet AMSL. Therefore, the attached zoning analysis finds that the 33 points at the referenced locations and elevations conform to the requirements of Code of Miami-Dade County, Chapter 33, Article XXXVII Airport Zoning, Sec. 33-333 (B) Height/Airspace Regulations.

The applicant has been made aware that all uses on the property are required to comply with airport operations and with federal, state and local aviation regulations, including the Code of Miami-Dade County, Chapter 33 as it pertains to airport zoning.

Should you have any questions, please feel free to contact me at 305-876-8080.

Attachments

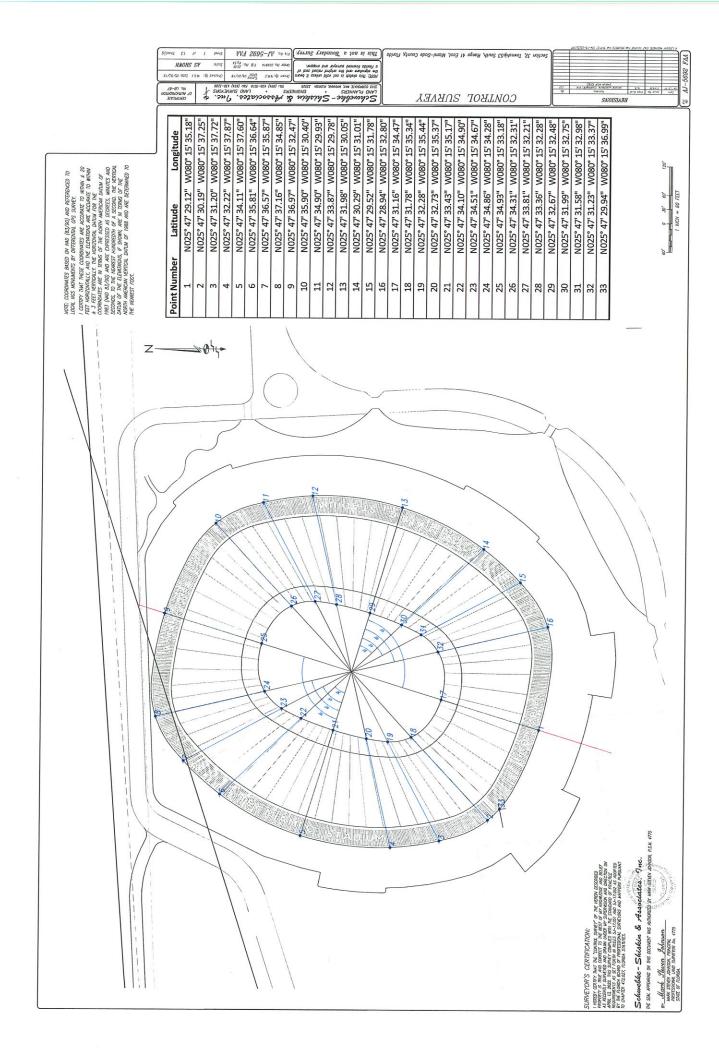
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27	N025° 47' 33.81" W080° 15' 32.21"	112'	
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Iris Escarra (305) 579-0737 escarrai@gtlaw.com

April 1, 2020

Mr. Jose A. Ramos, R.A. LEED AP Division Director Aviation Planning, Land Use, and Grants Miami-Dade Aviation Department P.O. Box 025504 Miami, FL 33102

RE: Determination Number DN-19-2947 Preliminary Land-Use/Airspace Analysis for the 131 Acre Site of the Proposed "Miami Freedom Park" project located at 1400 NW 37 Avenue, Miami, FL 33137 (Folio No. 01-3132-000-0080)

Dear Mr. Ramos:

Please accept this letter in response to your correspondence dated January 22, 2020, (the "January 22 Letter") on behalf of Miami Freedom Park, LLC ("MFP"), regarding the submittal for a preliminary land use/airspace analysis and determination for the proposed soccer stadium. The soccer stadium is to be located on an approximately 73 acre portion of the 131- acre City of Miami owned Melreese Golf Course and Country Club (the "Property"). On November 19, 2019, the Miami-Dade County Commission adopted Ordinance No. 19-112, which amended Chapter 33 of the County Code, specifically amending airport zoning regulations. Ordinance No. 19-112 had an effective date of November 29, 2019. The Preliminary Land-Use/Airspace Analysis application was filed with the Miami-Dade Aviation Department by MFP on November 27, 2019. In the January 22 Letter, the Miami-Dade Aviation Department ("MDAD") provided eight (8) comments for the proposed development of the overall Property. Below, please find responses to said points.

1. The Outer Safety Zone

MDAD provided comments regarding the proposed soccer stadium's proximity to the Outer Safety Zone (the "OSZ"). We note, however, that the soccer stadium location complies with the existing regulations and remains outside of the OSZ. Nevertheless, MDAD has requested that MFP submit floor plans, inclusive of all corridors, circulation, and ancillary spaces for the proposed soccer stadium. Even though this request deviates from MDAD's standard practice for properties located outside the OSZ, in the interest of full transparency, MFP will provide the requested plans once they are available.

2. Roadway Capacity

MDAD requested additional information regarding the steps to be taken to mitigate any traffic impact of the development on Miami International Airport. A preliminary traffic study has already been provided to MDAD consultants for their review. Additionally, the traffic study is publicly accessible at MiamiFreedomPark.com.

3. Stadium Lighting and Roof Reflectance

MDAD raised concerns regarding the proposed soccer stadium lighting, the proposed practice field lighting, and LED screens/scoreboards as seen on promotional materials, but not included as part of our preliminary submittal. The soccer stadium lighting plan is still in the process of being developed; however, extreme caution has been taken to ensure that all lighting will be directionally or physically baffled in order to ensure that light is not directed upward but rather specifically illuminated downward. Please note that the soccer stadium plan submitted was for a preliminary Land-Use/Airspace Analysis and updated plans will be submitted when available which includes the lighting plan.

MFP will develop and provide a lighting and glare proposal and actively work with MDAD planning personnel to ensure that potential glare emanating from reflective surfaces is studied and mitigated. MFP will evaluate the angle of any possible reflection from the soccer stadium relative to the angle of approach/departure that aircraft taken upon ascent and descent from runway surfaces. This modeling may include the use of light absorbing materials or angular designs to remove any potential glare and will demonstrate that all lighting associated with the soccer stadium and practice fields complies with the applicable regulations.

4. The 65-to74 DNL Noise Compatibility Restriction Zone

MDAD commented that the Property is located within the 65-to74 DNL Noise Compatibility Restriction Zone, which requires new construction to incorporate at least a 25-decibel outdoor to indoor Noise Level Reduction into design and construction. MFP is committed to meeting the federal noise abatement construction standards. As the plans further develop, and to the extent applicable, the 25-decibel outdoor to indoor Noise Level Reduction will be incorporated into the design.

5. Redesign of Stadium

As noted in the January 22 Letter, the proposed soccer stadium plans complied with the height restriction requirements of the Airport Zoning Code at points 1, 2, 5, and 6; however, MDAD commented that Points 3, 4, 7, and 8 may exceed the newly adopted maximum permitted height for new structures, as set forth in Ordinance No. 19-112, effective November 29, 2019. The proposed heights set forth in the preliminary plans were consistent with the height restrictions in place prior to the adoption of said ordinance, as discussed at our July 2, 2019 meeting. Even though we believe this project is grandfathered from the application of the new standards, MFP has revised the soccer stadium plan, included herein, to reduce the height of Points 3, 4, 7, and 8, to bring the height of the proposed soccer stadium into compliance with the new, more restrictive height requirements of the Airport Zoning Code.

6. Construction Cranes

MDAD requested additional information regarding the use of construction cranes in conjunction with the development of the soccer stadium and associated projects. Prior to commencement, MFP and its construction contractor will file Federal Aviation Administration ("FAA") Form 7460-1, which will set forth detailed plans related the project's use of construction cranes. Further, MFP will submit the construction crane plan to MDAD for review and coordination prior to any construction crane installation. Please note that the soccer stadium plan submitted was for a preliminary Land-Use/Airspace Analysis and updated plans will be submitted when available.

7. FAA Determinations of No Hazard

MDAD informed MFP that it could not make a final determination regarding the project until MFP obtains a "Determination of No Hazard to Air Navigation" from the FAA. MFP has applied for, and is in the process of obtaining, the required FAA Determinations of No Hazard for the soccer stadium project. Once obtained, the FAA Determinations will be forwarded to MDAD.

8. Avigation Easements and Covenant

MDAD requested a proffered covenant running with the land including, among other matters, an avigation easement. Concurrent with the submittal of the final soccer stadium plans, MFP will submit a draft Restrictive Covenant Running with the Land addressing the relevant points raised in the January 22 Letter.

We look forward to continuing to work with MDAD throughout this process. Should you have any questions, please feel free to contact the undersigned.

Sincerely,

Iris Escarra

Iris Escarra, Esq.



Miami Airline Liaison Office Miami International Airport

To: Miami-Dade County Aviation Department (MDAD)

From: Miami International Airport Airline Liaison Office (MIA ALO)

Date: April 8, 2022

Subject: Freedom Park Assessment from FAA Determination Letter – Update to the ALO letter

dated December 10, 2019

The MIA ALO has reviewed the documents provided from the FAA and there isn't any specific analysis we can perform that would provide any additional information than what the FAA has included. As we interpret these documents the FAA has determined that the proposed light poles on the stadium which are the highest penetration to the PART 77 and other surfaces at the MIA do not represent any hazard to air navigation, other than requiring certain conditions relating to lighting them etc. The FAA has identified that some of the proposed light towers on top of the stadium do violate some Part 77 surfaces, specifically:

- The MIA Horizontal Surface by 1 foot (for 9 of the proposed lights)
- MIA Runway 9/27 Transitional Surface by 1 foot (2 of the 14 lights)

They also identified an obstruction to the TERPS criterial that increases minimum instrument flight altitudes and specifically the Departure Surface. In their further analysis they state these obstructions would not increase the departure minimums and specifically no increase to the ceiling, visibility or climb rate. Typically, the airlines can best advise on the degree of impact to their operations from an obstacle particularly as it relates one engine out departure surface impacts (sometimes the required climb gradient can result in payload reductions or affect the range of the aircraft when using that runway). Where we have seen this before such as at ORD we typically have passed the obstruction information onto the airlines themselves for their subject matter experts and engineering departments to run through their models and determine how significant the impact would be.

There are some other items that could be issues in the future once the stadium is in place or during its construction, issues we have previously raised with MDAD and the BCC with our first letter of concerns dated December 10, 2019. First related to traffic during stadium events since the location is directly adjacent to the primary public entrance to the airport which likely will increase congestion and from an environmental standpoint could result in increased emissions that could reflect negatively on the airport in future EA/EIS type analysis or drive additional mitigation measures. Lighting – depending on the orientation of the lights, materials used in construction of the stadium etc. there is the possibility that even though the lights would be aimed down into the stadium they could have reflection or other issues that would be distracting to pilots on approach to Runway 27 and possibly other runways as well. Potential temporary impacts during construction – The FAA has analyzed the completed final points of the structure, there will be a separate airspace analysis required to evaluate temporary impacts due to

construction. It is likely that construction of the stadium will require the use of cranes whose height will exceed that of the final lights. Depending on the location of these cranes there could be impacts to operations at MIA and on Runway 9/27 from the cranes that would be more significant than what results from the completed building. These are difficult and/or challenging to identify or assess at this time, without more specific information on the height and locations of the cranes.

Our recommendation is effectively for the airlines to socialize this issue with subject matter experts related to operational procedures that may need to be modified based on the FAA's determination letter, MDAD's concerns, and the ALO's initial assessment.

Respectfully,

Sandra Cisneros

MIA ALO



MIAMI AIRLINE LIAISON OFFICE

Sandra Cisneros – Officer-in-Charge 2045 W. North Ave, Ste 2B Chicago IL, 60647 312.498.4170

December 10, 2019

Mr. Jose A. Ramos
Division Director
Aviation Planning
Miami Dade Aviation Department
Miami International Airport
P.O. Box 025504
Miami, FL 33102-5504
VIA ELECTRONIC MAIL

RE: Miami Freedom Park Development

Dear Mr. Ramos,

I am writing on behalf of the Miami Airport Affairs Committee (MAAC) to provide the Miami Dade Aviation Department (MDAD) with airline (including air cargo carrier) comments and to request additional information regarding the Miami Freedom Park Development (Freedom Park). We have outlined initial concerns expressed by the airlines based on the available information for the proposed Freedom Park and the data presented at the MDAD-hosted meeting held on Tuesday, November 5, 2019.

The chief concern of the airlines is the potential for Freedom Park to adversely impact their ability to operate flights safely without the loss of operational capacity or efficiency and to impede roadway access to Miami International Airport (MIA) for passengers and employees. The proposed Freedom Park would be located less than one mile east of Runway 9-27, Miami International Airport's (MIA's) longest runway. This runway is especially critical for the many long haul operations departing MIA. To ensure operational safety, Runway 9-27's extended centerline must remain clear of obstructions as per FAA regulations and at this point it is not clear whether the Freedom Park development complies with this requirement. In addition, it is unclear whether or not Freedom Park will present obstructions to the One-Engine-Inoperable surface for all aircraft in the airlines' respective fleets. Beyond flight operations concerns, the airlines are also alarmed by the proximity and expected high volume of roadway traffic to Freedom Park and the expected congestion that could impede or delay access to MIA by passengers and airport employees. A number of destinations from MIA, including to South America, may have only one daily frequency, increasing the adverse impact to customers who miss a flight due to surrounding traffic congestion. Flight operations could be delayed or cancelled if crew or support staff cannot gain timely access to MIA.

The following is a list of operating concerns compiled from airline input and requests for information regarding the proposed Freedom Park:

Operating Concerns:

 Miami ATC often uses a vector from the runway to avoid thunderstorm cells on departure. The stadium and additional buildings will restrict the available open departure headings, limiting capacity.

- Development of the stadium and facility may encourage further potentially disruptive development around the airport
- Payload impacts from ancillary lighting, obstacle clearance, or alternate runway
- Structural heights should not impede departure or arrival minimums or have any impact to revenue cargo
- · Light interference to pilots during night operations and potential for laser events
- Restrictions which may be proposed to mitigate noise with the development of the proposed soccer stadium; instead noise levels associated with normal flight operations should be expected at the stadium
- The potential for increased drone activity, as evident at other stadiums in the country; drone usage is difficult to prevent and police
- Event day vehicular traffic causing traffic delays to the airport and blocking airport access on Le Jeune Road
- Potential for construction cranes to create obstructions, adversely affecting operations and impacting minimums; communication of crane UP/DOWN status will be critical
- Potential for structures to interfere with navigational signals
- Banner towing impacting air traffic arrivals and departures at MIA
- Evaluation of proposed roofing material of Freedom Park structures should be required to ensure no light, including sunlight, is reflected into aircraft cockpits
- Helicopter traffic
- Potential loss of efficiency due to temporary flight restrictions during VIP events

This preliminary list of concerns may be amended as additional information, analyses, studies are provided for review and/or airline participation surrounding the development of the stadium.

Requests for Information:

- A comprehensive traffic study analyzing current traffic, anticipated traffic at the airport and, upon completion, anticipated traffic related to the proposed Freedom Park
- A copy of an airspace analysis and any airspace related coordination between the FAA and MDAD
- Proposed structure plans and renderings for all facilities at Freedom Park with GPS coordinates and structure heights
- The construction schedule and phasing for Freedom Park with details on how construction will be coordinated with MDAD and the airlines
- An expected usage analysis of Freedom Park, inclusive of expected games and events
- Confirmation that the construction will comply with the FAA's Advisory Circular 150-5300 13A, the One-Engine-Inoperable surface, and all Miami-Dade County Ordinances
- Benchmark analyses and impacts of other airports with nearby stadiums
- Recently approved MIA Zoning Amendment documents

Outlined below are observed impacts at other airports with a stadium nearby:

- LAX- The roof at the new Los Angeles Rams Stadium in Inglewood has been determined to cause
 multiple radar issues including duplicate targets for the same aircraft and inaccurate targets.
 After one year of debate and troubleshooting, the stadium finally agreed to purchase a secondary
 radar for LAX airport.
- LAS- The new Las Vegas Raiders football stadium in downtown Las Vegas presents a significant impact to vehicular access to McCarran Airport LAS. The Raiders and LAS have not yet reached an agreeable solution for this problem.

- PHX- FAA discovered they did not have the authority to prevent Arizona State University from detonating fireworks during football games at Sun Devil Stadium. PHX TRACON facility was forced to shut down landing access to the south runway complex at PHX due to firework usage.
- SJC- San Francisco 49ers stadium in Santa Clara creates routine concerns for flight crews due to bright lights.

The MAAC looks forward to continued engagement with MDAD and other airport stakeholders to ensure safe airport operations and reasonable access to the airport in light of the proposed Freedom Park.

Respectfully,

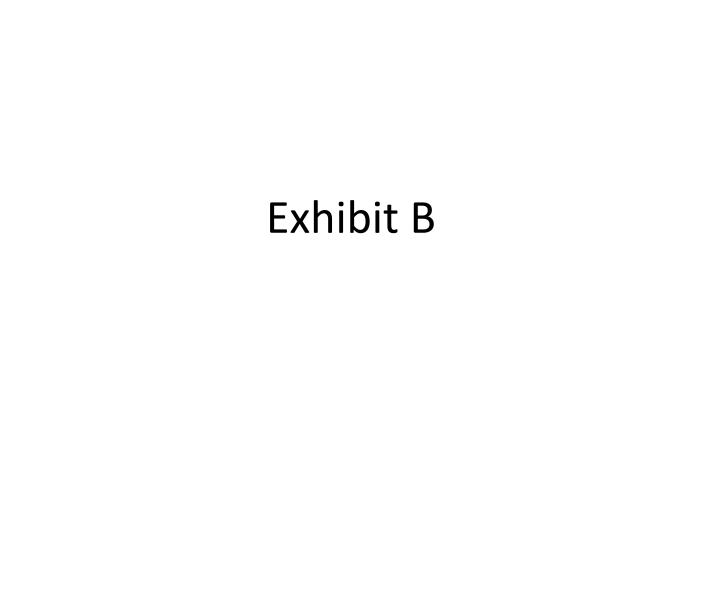
Sandra Cisneros

Miami Airline Liaison Office

CC:

MAAC Chairperson, Kendra Kennedy MIA MAAC

Ken Scarborough, Planning Technology, Inc. Lenore Diamond, American Airlines





Date:

April 6, 2022

To:

Ralph Cutié

Aviation Director and Chief Executive Officer

From:

Robert Warren

Assistant Aviation Director

Subject:

Response for BCC Resolution-Update on Business Impacts on MIA from the new Freedom Park Development at Melreese Golf Course in The City of Miami

Politer !

The following is an update to the comments made previously to the memo submitted to the Board of County Commissions related to the potential impacts to the commercial activities at Miami International Airport from the proposed development of International Links Melreese Country Club by the City of Miami.

Based on still limited information available on the Miami Freedom Park's website concerning the commercial/retail developments planned, the potential development envisions to have a Hotel and Conference Center with 750 rooms and a restaurant and retail village. It appears that the retail village will encompass approximately 600,000 square feet with a mix of food and beverage locations and retail stores. There is a concern due to the lack of actual schematics that show the final design of the Freedom Park where changes can be made after the fact and cause an issue to traffic and impact revenue to the Airport.

The customer base for an on-airport hotel is primarily the traveling public. These hotels serve as a transfer point in a passenger's greater travel plans for a short-term connection or a longer stay before they reach their destination. By contrast, special event participants choose hotel properties with easy access to the city and more amenities than an airport property.

The potential conflicts would arise if the "Miami Freedom Park" proposed hotel would incorporate modern technology in meeting rooms thus competing for the meeting space business. Meeting rooms in the surrounding area are limited in modern technology. The Airport is moving forward with the RFP for the development of a new 350-400 room hotel to be built by a private developer connected to the North Terminal with meeting space of 25,000 square feet where modern technology can be installed. This will counteract some of the impact of a new hotel at Freedom Park for small to midsize meetings, but Freedom Park will still be a competitive force especially for the larger meetings and conferences.

The food and beverage and retail impacts to the Airport are very difficult to analyze due to the limited data currently available. The Aviation Department received information from other U.S. airports with similar competitive environments (e.g., major malls within a 2 to 3 miles radius).

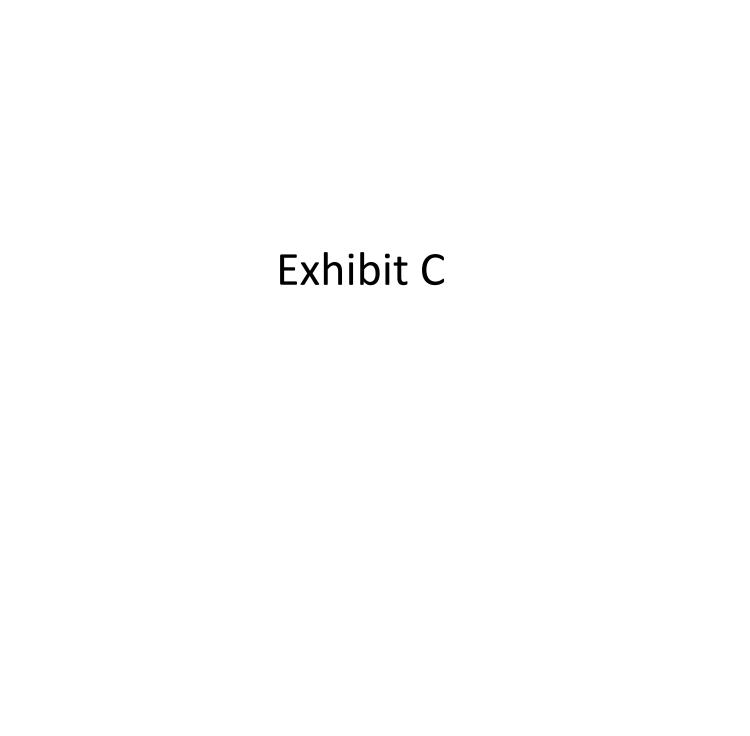
Tampa International Airport has two malls and multiple hotels within a three (3) mile radius such as the International Plaza which is Tampa's premier shopping mall with many sit-down and quick service dining options. Westshore Plaza is more mainstream with many sit-down and quick service dining options. The former Director of Concessions at Tampa International informed MIA that these venues and hotels had no impact on concession and airport hotel revenues.

April 6, 2022 Response for BCC Resolution Page 2

Similarly, Chicago O'Hare International Airport has the Fashion Outlets, and numerous hotels within a two (2) mile radius of the Airport and they do not impact the airport's concession program.

Prior to the pandemic, the Aviation Department had shuttle services operating out of the Airport to Dolphin Mall and other retail destinations for long layover passengers. Therefore, given the existing data conditions, the Aviation Department does not believe that the Miami Freedom Park will have a major impact on concession revenues at Miami International Airport. The effect on post-security food and beverage and retail should be minimal because most domestic passengers have a limited time to shop and eat and most prefer doing these activities post security. These passengers are not typically customers of a new shopping area off Airport grounds on the day of their travel. For international travelers who want to shop or eat a meal in Miami before they depart and have several extra hours, there is the possibility that they will utilize the new retail spaces for eating or shopping prior to arriving at the airport. This could have a small impact to spending at the Airport. Having a connection via a bridge over the canal from Freedom Park to the MIA Mover train at the Rental Car Center and the MIC could make it easier for future passengers to stop at Freedom Park prior to arriving at MIA. Also, it is unknown if a shuttle service to the Airport will be provided by the retail complex at Freedom Park to encourage use of their commercial facilities prior to going to MIA or waiting many hours for a connecting flight from MIA. As stated above, this is only currently provided for long layover passengers on a limited basis to Dolphin Mall. Being very close to the Airport, Freedom Park could provide a very frequent shuttle.

To be better understand in more detail the financial impact to MIA, more information on the planned retail, and food and beverage venues at Freedom Park are required. The current website shows an estimated 600,000 square feet of commercial space, but there is no breakdown at this time. Once this information is made available MIA can isolate the planned venues and services at Freedom Park (off-airport) versus the on-airport (MIA) concession program.





Date: March 15, 2022

To: Ralph Cutie, Aviation Director

Miami-Dade Aviation Department (MDAD)

Lee N. Hetty, RER Assistant Director From:

Division of Environmental Resources Management

Subject:

Report on Possible Impacts to Miami International Airport (MIA) by

the Proposed Development on the International Links Melreese

Country Club

This memorandum updates the November 22, 2019 memorandum previously issued on this subject. Please see comments below in response to MDAD's request for assistance in responding to the directive issued by the BCC via Resolution No. R-967-19, specifically the analysis of the potential environmental impacts to MIA from the stormwater runoff or movement of existing hazardous materials due to the proposed development by the City of Miami at the above referenced site.

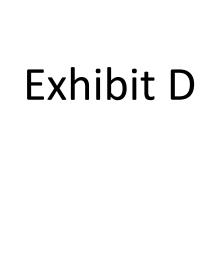
The International Links Melreese Golf Course has documented on-site solid waste, as well as soil and groundwater contamination. At this time DERM has no record of off-site contamination associated with the subject site. However, if additional site assessment activities reveal off-site contamination impacts that originate from the above referenced site, the City (as the party responsible for site rehabilitation) will be required to address and remediate those off-site impacts. Furthermore, due to the existing on-site solid waste and soil contamination, any redevelopment of the subject site will require further coordination with DERM. Any plans for proposed redevelopment will require prior DERM review and approval to ensure proper handling and/or disposal of contaminated material. This will include conditions for proper site management to ensure hazardous materials (solid waste and contaminated soils) are not allowed to impact off-site properties, including but not limited to the MIA property. Be advised that on August 14, 2019 and December 13, 2019, a supplemental site assessment report and Conceptual Site Rehabilitation Plan (SRP) was submitted to Miami-Dade County RER-DERM. The conceptual plan outlined the proposed actions, to be conducted concurrently with the proposed site development, that would ensure the process of constructing and completing the development would remain protective of human health and the environment. DERM provided comments to the proposed plan and provided additional requirements in a response to the Conceptual SRP in a letter dated December 23, 2019. DERM requires that the final SRP be submitted for review and approval prior to site development activities

In addition, please be advised that any proposal for stormwater system improvements / expansion / redesign at the subject site (e.g., during any proposed development) will also require DERM review and approval. At that time, DERM technical staff will conduct a thorough review to ensure that any proposed stormwater system modifications comply with Miami-Dade County Code and that applicable regulations are adhered to in order to ensure that stormwater is properly managed and that discharges will not disperse the groundwater contaminant plume to off-site properties.

Ralph Cutie March 15, 2022 Page 2 of 2

Additionally, such stormwater improvements will require groundwater monitoring to verify that no off-site dispersion of said contaminants occur.

If you have any questions, please feel free to contact Wilbur Mayorga, P.E., Chief of the Environmental Monitoring and Restoration Division via telephone ((305) 372-6708) or via email (Wilbur.Mayorga@miamidade.gov)



Date:



To: Honorable Carlos A. Gimenez

Mayor

From:

Alice N. Bravo, P.E., Director

Department of Transportation and Public Works

Subject: Resolution directing the County Mayor to provide a report on possible impacts to Miami

International Airport from the proposed development of International Links Melreese Country Club by the City of Miami; directing the County Mayor to place such

report before the Board within 90 days pursuant to Ordinance No. 14-65

At the September 4, 2019 Board of County Commissioners (Board) meeting, the Board approved Resolution No. R-967-19 sponsored by Vice Chairwoman Rebeca Sosa, directing the County Mayor to provide a report on the possible impacts to Miami International Airport (MIA) from the proposed development at the International Links Melreese Country Club in the City of Miami.

Since then, Miami-Dade County (Transportation and Public Works Department and Aviation Department) have completed <u>a review of the available information provided</u> in the report, "Miami Freedom Park and Soccer Village Traffic Study" dated June 2019. The intent of the report is to provide a preliminary impact analysis of the traffic to be generated by the proposed development on the surrounding area.

After review of the subject traffic impact study, the following summary of concerns are offered:

- The study area is very limited to the vicinity of the site.
- The traffic data used for the study showed lower traffic counts when compared to the Average Daily Traffic (ADT) between historical Florida Department of Transportation (FDOT) traffic count data and field data (traffic counts). The counts were collected in 2018 while the SR-836/Dolphin Expressway was under construction in the vicinity of the project.
- Specifically, of concern are the lower traffic counts at on-ramps and off-ramps from SR 836 on LeJeune Road and those in the vicinity of the Miami Intermodal Center (MIC) used in the analysis.
 This may understate the traffic impacts generated by the development and/or the infrastructure improvements needed for the development.
- 10 of the 28 intersections in the study area are approaching capacity under existing conditions and/or future conditions with the "project" including three key intersections each along NW 42nd Avenue and NW 37th Avenue.
- Traffic volumes from FDOT Traffic Online website indicates that SR-836/Dolphin Expressway in the study area is approaching capacity with Level of Service (LOS) E (2013 Quality and Level of Service Handbook, FDOT).
- There are 3 specific improvements that are an integral part of the study that have not been proposed or presented to the agencies with jurisdiction for concurrency, acceptance, or review:
 - 1. New off-ramp from NB 42nd Avenue/LeJeune Road towards the development
 - 2. New signalized full-access driveway on NW 14th Street between NW 42nd Avenue and the newly constructed WB SR-836/Dolphin Expressway off-ramp
 - 3. Pedestrian bridge from the MIC (over NW 21st Street, a private property, and Tamiami Canal C-4v) to the proposed stadium

To fully understand the impacts of the proposed Freedom Park and Soccer Village on the surrounding roadway network and specifically the airport (post SR-836/Dolphin Expressway construction activities), it is required that the development submits a traffic study that includes but is not limited to:

Honorable Chairman Audrey M. Edmonson and Members, Board of County Commissioners Page 2

- 1. Approved methodologies from MDC DTPW, MDC Aviation Department, FDOT, MDX, Florida Water Management District, and City of Miami
- 2. New traffic counts
- 3. Analysis during the peak hours including the peak airport hours of operation
- 4. Regional transportation model (SERPM)
- 5. Comprehensive Transportation Management Plan (TMP)
- 6. Parking analysis
- 7. Pedestrian connectivity improvements
- 8. Analysis and improvements (if needed) to transit facilities

The detailed review and comments from MDC and comments provided by FDOT are included as Appendix A for reference.

Based on the analysis conducted, it was found that insufficient information was provided by the applicant to address the concerns of the Board of County Commissioners, as stated in the Resolution No. R-967-19. Please note that to provide a response to the Board, a new detailed study encompassing a larger area would need to be prepared by the applicant since much of the study depends on the scope and intensity of the development they are proposing. The parameters of the development have yet to be finalized by the City of Miami. A new analysis that encompasses the appropriate study area would cost at a minimum \$750,000.

Pursuant to Ordinance 14-65, this memorandum will be placed on the next available Board meeting.

If additional information is required, please contact Alice N. Bravo, P.E., Director, DTPW, at 786-469-5406.

cc: Abigail Price-Williams, County Attorney
Geri Bonzon-Keenan, First Assistant County Attorney
Jennifer Moon, Deputy Mayor, Office of the Mayor
Alice N. Bravo, P.E., Director, Department of Transportation and Public Works
Yinka Majekodunmi, CPA Commission Auditor
Christopher Agrippa, Clerk of the Board
Eugene Love, Agenda Coordinator



APPENDIX A

To: Miami-Dade Department of Transportation and Public Works

From: T.Y.Lin International

RE: MIAMI FREEDOM PARK & SOCCER VILLAGE

Traffic Study dated June 2019

As requested, TYLI has reviewed the traffic impact study for the above referenced project. TYLI's comments are summarized below in the following categories:

1. Overall Methodology

- 1.1 A methodology meeting should be conducted with agencies affected by the proposed project to determine the project scope and study area. It appears no such meeting took place with Miami-Dade County, FDOT, SFWMD, MDX, etc.
- 1.2 Section 1.3, Methodology The study mentioned it used "the methodology for a typical study for the City of Miami". However, there were no specific standards mentioned.

2. Project Study Area

2.1 Section 2.0, Study Area – The study does not discuss how the limits of the study area were determined or how the studied intersections were identified.

3. Site Plan and Access/Egress

3.1 Exhibit 13, Game Day Departure – There are concerns with trip egress assumptions for traffic exiting the project driveway onto NW 37th Avenue. Traffic is shown to continue north to NW 21st Street, then to northbound and southbound NW 42nd Avenue. However, based on the existing roadway configuration, **this routing is not possible**, motorists would have to enter and exit through the MIC in order to access northbound and southbound NW 42nd Avenue. Please note that under the current roadway configuration, this maneuver is not possible. If this maneuver is proposed, impacts to the **MIC traffic should be evaluated**. Please refer to **Attachment 1-1 and 1-2**.

4. Intersection Turning Movement Counts

4.1 Section 2.0, Data Collection – Data was collected between September 6-15, 2018. This time period concurred with the construction and Maintenance of Traffic (MOT) of the NW 57th Avenue DDI at FL-836 that opened in January 2019. The TIS count data collected should be compared to available Florida Department of Transportation Online data for consistency purposes. Please refer to the traffic count ADT comparison table that compares the TIS 2018 count data to FDOT's 2018 and 2017 count data and notes the major discrepancies. Based on the table, it appears FDOT ADT's in 2018 yielded lower volumes than the previous year in 2017 most likely due to MOT conditions. The table also shows several locations where the TIS 2018 counts are significantly different from the FDOT counts. In summary, new count data is



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needed during typically non-MOT conditions and with major area wide improvements in place at the studied locations as identified in agency methodology meetings.

ADT Comparison Table:

ADI Comparison Tabic.						
Ramp Locations	ADT Collected for TIS**	ADT FDOT Online 2018***	FDOT Count Dates	% of Discrepancy 2018	ADT FDOT Online 2017	% of Discrepancy 2017
SR 836 EB On Ramp (Bet. SB NW 42 nd Ave – EB SR 836)	4,509	4,600 C	July 24-25	-2%	5200 F	-13%
SR 836 WB On Ramp (Bet. NB NW 42 nd Ave – WB SR 836)	13,538	11,500 F		18%	11,500 C	18%
SR 836 WB Off Ramp (Bet. WB SR 836 – NB NW 42 nd Ave)	5,219	3,300 C*	June 20-21 Aug 1-2	58%	4,400 F*	<mark>19%</mark>
NW 21 st St EB On Ramp (Bet. SB NW 42 nd Ave – EB NW 21 st St)	2,747	1,900 C	Aug 15-16	45%	2,300 F	<mark>19%</mark>
NW 21 st St WB On Ramp (Bet. NB NW 42 nd Ave – WB NW 21 st St)	NA	15,500 C		-	15,000 F	
SR 112 On (Bet. NB NW 42 nd Ave Under Overpass – EB SR 112)	11,505	12,500 C	Feb 27-28	-8%	12,500 F	-8%
SR 112 On (Bet. WB SR 112 – SB NW 42 nd Ave)	17,036	9,700 C	Feb 27-28	76%	13,500 F	<mark>26%</mark>
SR 836 EB On (SB NW 27 th Ave – EB SR 836)	5,843	NA			NA	
SR 836 WB Off (WB SR 836 – NB NW 27 th Ave)	6,447	NA		-	NA	
MIC & NW 42 nd Ave SR 953 NB On Ramp	3,323	3,900 C	Aug 1-2	-15%	4,100 F	-19%
MIC & NW 42 nd Ave SR 953 SB On Ramp	1,741	2,000 C	Aug 15-16	-13%	2,200 F	-21%

Segment Locations	ADT Collected for TIS**	ADT FDOT Online 2018***	% of Discrepancy 2018	ADT FDOT Online 2017	% of Discrepancy 2017
NW 17 th St Bet. NW 33 rd Ave & NW 32 nd Ave	9,596	5,900 T	63%	6,600 S	45%
NW 34 th Ave Bet. SR 836 & NW 11 th St	9,186	4,900 T	87%	5,400 S	70%
NW 14 th St Bet. NW 31 st Ave & NW 30 th Ave	9,437	5,200 T	81%	5,800 S	63%
NW 11 th St Bet. NW 32 nd Pl & NW 32 nd Ave	8,064	7,100 T	14%	8,000 S	1%

Note: * ADT was calculated based on FDOT Online data available.

^{**} TIS count data September 6-15, 2018.

^{***}NW 57th Avenue DDI at FL-836 opened January 2019. MOT during 2018 counts.

C = Computed

F = First Year Estimate (uses the counted the year before in most cases)

S = Second Year Estimate

T = Third Year Estimate

Green highlight shows FDOT 2017 volumes higher than FDOT 2018.

Yellow highlight shows TIS Counts are closer to the older 2017 counts.

Red highlight indicates the most significant discrepancies.



- engineers | planners | scientists
 - 4.2 A map identifying the studied TMC intersections and roadway segment locations (as shown in Appendix C) as well as the peak hour data collected would be helpful in assessing the study area in the body of the report. In addition, a map identifying the ADT volume data collected should be including in the report.
 - 4.3 The map identifying the count locations as shown in Appendix C includes 9 ramp locations. However, Appendix C included data for 10 locations. It appears the two (2) MIC ramps were not shown on the map and the NW 21st WB on ramp data was not included in Appendix C. In addition, several 24-hour count locations identified on the Map in Appendix C did not include the count data in the appendix or the location did not correlate to the data included.

5. Trip Generation & Distribution

- 5.1 Section 4.1, Trip Generation A 20% reduction was applied to account for other modes of transportation for each land use. The rationale for this assumption should be explained in more detail. Different percentages may need to be considered. For example, retail use may have a different percentage of trips generated using other modes of transportation than office use may have.
- 5.2 Trip Generation Section 5.0 mentions the project is in the County's Urban Infill Area. Was the ITE Trip Generation Handbook criteria for Infill Areas taken into consideration when calculating the trip generation and internalization discounts?
- 5.3 Section 4.4 Trip Distribution A clear rationale for trip distribution was not included in the report. It is suggested that the adopted regional travel demand model (SERPM 8.0) be used to evaluate traffic impacts on a weekday.
- 5.4 Based on the assumption that approximately 7,500 patrons would use transit, it is anticipated that additional transit service (supply) would be required on game days. An estimate of additional Tri-Rail and Metrorail trips or reduction is headways in not included in the report.

6. Traffic Analysis

- 6.1 Section 5.2, Growth Rate A 0.25% growth rate was used which seems low even with a negative historical growth rate calculated. Typically, at least 0.5% is used per year for unforeseen background traffic.
- 6.2 Section 5.2, Background Traffic In addition to the planned improvement projects that were included in this traffic study, all committed developments in the project area and the trips associated with them need to be included as background traffic volumes. For example, the proposed Palmer Lake District Hotel (3677 NW 24th Street) trip generation and distribution should be included as background traffic volumes.

7. Synchro Analysis LOS

- 7.1 Section 5.0 Intersection Capacity Analysis A LOS analysis was done for Existing and Future Build scenarios. However, analysis of a Future No-Build scenario is a typically criteria analyzed for comparison purposes.
- 7.2 Multimodal LOS was not conducted as part of this report. This type and size development typically include pedestrian, bicycle, and transit LOS.
- 7.3 Section 5.1, LOS Standards The City of Miami's adopted LOS standards were not clearly described in this section



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- 7.4 Section 5.2.1, Exhibits 14-16 The LOS tables only note overall intersection LOS and should provide additional information including turning movement LOS and seconds of delay. In addition, volume to capacity ratio's 1.0 or greater should be noted.
- 7.5 Appendix G, PHF It appears the PHF's were calculated for the total intersection, however the PHF's should be calculated separately for each intersection approach.
- 7.6 Appendix G, LOS Analysis At some locations, although the overall LOS shows acceptable levels, there are turning movements that currently fail or are projected fail with LOS 'F' and may need to be mitigated. For example, intersection 7 NW 42nd Avenue/NW 14th Street during the PM peak the WBL and WBR movements fail as a result of the Future Build traffic.
- 7.7 Sections 1.3, 5.0, & Appendix G It should be noted that the latest HCM 6th Edition intersection LOS summary reports were used and the HCM 2000 LOS was reported only when the latest edition did not support the intersection geometry.

8. Impacts to the Miami International Airport Operations

- 8.1 MIA internal streets are open to the public. Traffic from the proposed facility combined with traffic generated by the airport should be assessed for existing and future conditions. In general, the study does not address traffic impacts to Perimeter Road for example or any other potential cut through traffic that could access the proposed stadium using NW 21st Street. Please refer to Attachment 2.
- 8.2 Traffic impacts to vehicles entering and exiting MIA and terminal volumes were not used. For example, will there be impacts to airport traffic with the additional new weaving movements for the proposed off-ramp from NB 42nd Avenue/LeJeune Road? Will this ramp create a backup for traffic going into the airport? Will the access to the Airport from LeJeune Road become blocked?

9. Technical Soundness and Internal Consistency

9.1 Section 1.1, Paragraph 2, Project Phases – It mentions the project will be developed in multiple phases. Specific details regarding the time frame, intensity, etc. of each phase are not discussed. Additionally, capacity analysis may be needed for the interim phases.

10. Appropriateness of Proposed Mitigation Measures

- 10.1 Agency Coordination The following transportation improvements that provide access to the proposed site need coordination with and approval of FDOT, MDX, County, and possible SFWMD:
 - New off-ramp from NB 42nd Avenue/LeJeune Road.
 - New signalized full-access driveway on NW 14th Street between NW 42nd Avenue and the WB SR-836 off ramp.
 - Pedestrian bridge to the proposed stadium from MIC over NW 21st Street.
- 10.2 New off-ramp from NW 42nd Avenue to Site Does the addition of this new off-ramp to access the site meet FDOT design standards for merging traffic? The distance available to the north and south of the proposed off-ramp appears to be below standard distances. In addition, please provide details on the lane configuration of the new off-ramp. For example, is the NB 3-lane section being maintained or is an additional right lane being added for the off-ramp? A conceptual engineering drawing is needed to better understand the operational constrains. Please refer to **Attachment 2**.



10.3 Traffic Calming Improvements – The study lacks documentation of any public outreach related to the proposed traffic calming improvements in the Grapeland Heights Neighborhood.

11. Inter-agency Coordination

11.1 In an effort to provide a comprehensive review of the proposed development, MDTPW has contacted other relevant agencies such as Miami-Dade Expressway Authority, Florida Department of Transportation, the South Florida Water Management District and other internal Miami-Dade departments such as Transit to establish if the proposed development has been discussed with relevant stakeholders and if they had a chance to provide input. Based on our discussions to date, **none of the agencies noted have been approached by the applicant to review the subject TIS.** Because of the short schedule, feedback was received from FDOT (see comment #12 below), but not enough time was available for some of the other stakeholders to provide feedback.

12. FDOT Comments

- 12.1 The <u>FDOT Traffic Operations</u> has reviewed the traffic study and provided specific comments related to stakeholder coordination, study methodology, study area including Perimeter Road, trip generation adjustments and trip distribution questions. Technical comments related to the background growth rate, emission of a no-build analysis, parking analysis, capacity analysis summary and signal timing accuracy were also provided. Please refer to the specific FDOT Traffic Operations comments, dated February 14, 2020, detailed in **Attachment 3.**
- 12.2 The FDOT Planning and Environmental Management Office has reviewed the traffic study and provided specific comments related to public transit accessibility improvements including Metrorail vehicle needs, Metrorail incentive potential conflicts with daily commuters, Metrobus consideration, bus stop impacts, and coordination with the City of Miami Trolley. Additional information was requested for traffic calming and pedestrian improvements, parking prevention within Grapeland Heights Neighborhood (GHN), bike improvement considerations, and a comprehensive transportation management plan. Lastly, further explanation of the potential weave area at the park entrance point on LeJeune Road was requested to ensure there are no safety issues. Please refer to the specific FDOT Planning comments, dated March 10, 2020, detailed in **Attachment 4.**

Conclusions and Next Steps

After review of the subject traffic impact study, it was found that insufficient information was provided to address the concerns of the Board of County Commissioners of Miami-Dade County as stated in the resolution, dated September 4, 2019, "to analyze potential impacts to MIA from development of Melreese, including development of stadiums, hotels or commercial space at that location". Also, the resolution states "to consider: traffic impacts, potential road closures, environmental impacts, commercial impacts, airport operations, and aviation impacts, if any, the costs to MIA to mitigate any such impacts, and Federal Aviation Administration requirements".

The proposed next steps include providing a comprehensive traffic impact study including a methodology meeting with all agencies that have jurisdiction within the project study area. The estimated fee to conduct a comprehensive study is approximately \$750,000.



Attachment #1-2

TYLI Review (Comment 3.1)





Meaghan Capuano

Subject:

FW: Freedom Park and Soccer Village

TYLI Review (Comment 12.1)

From: Lu, Jinyan < Jinyan.Lu@dot.state.fl.us>

Sent: February 14, 2020 4:06 PM

To: Juan Nunez < <u>juan.nunez@tylin.com</u>>

Cc: Meitin, Omar < Omar.Meitin@dot.state.fl.us; Iglesias, Daniel < Daniel.Iglesias@dot.state.fl.us; Huynh, Dat < Dat.Huynh@dot.state.fl.us; Cartaya, Nilia < Nilia.Cartaya@dot.state.fl.us; Freeman, Raymond < Raymond.Freeman@dot.state.fl.us; Phani Allu < pallu@ctseinc.com; Sheng Yang

<Syang@ctseinc.com>

Subject: RE: Freedom Park and Soccer Village

Good Afternoon Juan,

Based on a review of the traffic study, please find below the comments from the Department Traffic Operations Office.

- 1. Given the size and location of the development, please clarify if there has been any coordination with other stakeholders such as MDX, Miami-Dade County, and the City of Miami. Also, please clarify if there has been any coordination with other offices, specifically the planning office and the modal office within the Department (FDOT). If so, please share any approved methodology. It is understood that the need for a transportation management plan (TMP) with these agencies for game days was identified within the report.
- 2. Page 1, the Study Objective indicates that the traffic impact analysis follows methodology for a typical study for the City of Miami. Considering the size of the proposed development, please clarify if there was an approved methodology to identify area of influence, analysis elements (intersections, segments, weave, merge, diverge, etc.), analysis software, measures of effectiveness (LOS, queues, etc.), and other assumptions (such as rideshare percentages, transit trips, etc.).
- 3. Pages 20/22, it was indicated that the US Census Bureau shows that 17.6% of the public within the area use other modes of transportation. However, 20% adjustment was used in the trip generation shown in Exhibit 6. This may lend to a non-conservative approach for assessing traffic impacts. Please verify/clarify. Also, please contact FDOT Modal Office and Miami Dade Transit to confirm such assumption from Census Bureau is reasonable.
- 4. Pages 22/23/25/26, based on the trip generation, it is estimated that the development will generate 640 trips during the AM peak hour, 1,550 trips during PM peak hour on a typical weekday. On a game day, it is estimated that the development will generate 3,125 before kickoff and 3,740 after the match concludes. Section 4.4 on page 26 indicates that cardinal distribution was used for the trip distribution. Given the size and location of the development that would draw trips from a relatively large area in comparison to a smaller development, it may be prudent to distribute traffic using the regional transportation model (SERPM) runs.
- 5. Page 32, a nominal annual growth rate of 0.25% was utilized for estimating background traffic growth for opening year 2025. Considering the affected area, a trends analysis using historical data and SERPM model data, especially for the surrounding major roadways should be undertaken to identify an appropriate annual growth rate. In addition, the analysis appears to compare the existing conditions and the built-out (opening year) conditions. For the subject development, a no-build (background + committed developments) vs build comparison for opening and future years (such as a determined design year, 2045) should be considered and identify improvements necessary to mitigate any impacts. Please consider including future year into the analysis.
- 6. Pages 31/33, Based on the analysis, the unsignalized intersection of NW 37th Avenue and NW 16th Street experiences delay in the westbound approach during the PM peak hour. It is mentioned that this may be due to the software tending to overestimate delay measurements for minor approaches at unsignalized intersections. Please elaborate ... was the delay compared to a field-observed/collected delay; and if attributes within software could be adjusted to estimate a reasonable delay reflecting field conditions.

- 7. Exhibits 14, 15, and 16 (pages 37 41), in the LOS summary tables, please summarize the LOS/Delay results by the movement, approach in addition to the overall intersection. Also, please summarize the 95th percentile queues (and identify any anticipated spillbacks from turn lanes). For stop-controlled intersection, please provide delay and level of service of the left-turn movements on major roads, and all applicable movements for side streets. It is suggested to compare results for the turning movements that the development has impact. Also, please elaborate on how the intersections for police control were identified.
- 8. Page 42, it appears SR 836 ramps in the vicinity of the development were included in the analysis. Please consider analysis of SR 836 mainline, ramp merge, diverge, and weaving sections. Along, SR 836, the analysis area included NW 27 Avenue interchange to the east, and LeJeune Road to the west. It may be prudent to extend the analysis area further west to include NW 57 Avenue interchange given that the subject development could be accessed from NW 57 Avenue interchange via NW 12 Street/Perimeter Road.
- 9. Page 50, for parking analysis, data from Atlanta United Games was referenced. The ridesharing use in Atlanta United games was approximately 10%. Since an annual increase was suggested in coming up with a 15% rideshare factor for the subject development, please verify the referenced time period/year for the Atlanta United Games.
- 10. Page 50, for parking for hotel use, data from a hotel on LeJeune Road was collected and identified that 58% of the hotel patrons used hotel shuttle, ridesharing, or other modes of transportation (and did not have to park). However, it was estimated that 80% of the hotel patrons from the development will not to park on-site. This may lend to a non-conservative approach for assessing parking needs. Please verify/clarify.
- 11. In Synchro analysis, please verify the signal timing input. For some of the intersections, the signal timings used in Synchro analysis were not consistent with the timings in the time-of-day (TOD) schedule report. For example, for the intersection of NW 42 Avenue & NW 14 Street, existing weekday PM analysis: The WBT green time (60 seconds) included in the Synchro report is not consistent with the WBT green time (54 seconds) included in the TOD schedule report. Also, the clearance intervals (yellow and red) used in the Synchro analysis were not consistent with the signal timing plans. For example, for the intersection of NW 42 Avenue & NW 36 Street, Existing Weekday AM: the red clearance time used for NBLT, SBLT< and EBT in Synchro were 4 seconds, 4 seconds, and 3 seconds, respectively. The signal timing plan indicates 3 seconds, 3 seconds, and 4 seconds, respectively. Please review and revise the analysis accordingly.
- 12. Page 51, in conclusions, it was indicated that all signalized intersections are currently and projected to meet the City's LOS standards. Please include LOS standards for the City of Miami within the report.

Please let us know if you have any questions.

Thanks,
Jinyan (JY) Lu, PE, PTOE
Traffic Services Engineer II
FDOT District 6 Traffic Operations
305.470.5156
Jinyan.Lu@dot.state.fl.us

Meaghan Capuano

Subject:

FW: Freedom Park and Soccer Village

TYLI Review (Comment 12.2)

From: Lu, Jinyan < Jinyan.Lu@dot.state.fl.us>

Sent: March 10, 2020 3:43 PM

To: Juan Nunez < juan.nunez@tylin.com >

Cc: Jeffries, Ken < Ken.Jeffries@dot.state.fl.us >; Iglesias, Daniel < Daniel.Iglesias@dot.state.fl.us >; Huynh, Dat

<<u>Dat.Huynh@dot.state.fl.us</u>>; Meitin, Omar <<u>Omar.Meitin@dot.state.fl.us</u>>; Cartaya, Nilia <Nilia.Cartaya@dot.state.fl.us>; Freeman, Raymond <Raymond.Freeman@dot.state.fl.us>

Subject: FW: Freedom Park and Soccer Village

Good Afternoon Juan,

Per our conversation over the phone, please find below the review comments from the Department Planning Office. If you have any questions or feedback, please contact our Planning Manager Ken Jeffries.

Thank you,
Jinyan (JY) Lu, PE, PTOE
Traffic Services Engineer II
FDOT District 6 Traffic Operations
305.470.5156
Jinyan.Lu@dot.state.fl.us

From: Jeffries, Ken < Ken.Jeffries@dot.state.fl.us>

Sent: Tuesday, March 10, 2020 9:38 AM

To: Lu, Jinyan < Jinyan.Lu@dot.state.fl.us>; Huynh, Dat < Dat.Huynh@dot.state.fl.us>; Cartaya, Nilia

< Nilia.Cartaya@dot.state.fl.us >; Freeman, Raymond < Raymond.Freeman@dot.state.fl.us >

Cc: Iglesias, Daniel < Daniel. Iglesias@dot.state.fl.us>; Meitin, Omar < Omar. Meitin@dot.state.fl.us>; Allu, Phani

<pallu@ctseinc.com>; Sheng Yang <Syang@ctseinc.com>

Subject: RE: Freedom Park and Soccer Village

Hi Jinyan – These are the review comments from planning.

- 1) Public transit/transit accessibility improvements
 - a. Page vi/13, Please document/quantify in the report and the comprehensive transportation management plan (TMP) on:
 - i. How many Metrorail vehicles need to be provided to enhance transit service on game days?
 - ii. What is the best headways for Metrorail vehicles on game days?
 - b. Page vi/13, It was indicated that incentives will be provided to patrons to use the Metrorail. The weekday game day arrival period is 6:30 pm 7:30 pm, which will influence the normal user of Metrorail (daily commuter). Please analyze how the game day will impact normal transit users pattern and how to solve the potential conflict between existing daily commuter and patrons to the game
 - c. Metrobus
 - i. Page vi/14, It is indicated that the Freedom Park is served by 9 Miami-Dade transit bus routes. Please consider improving Metrobus service to better serve the project.
 - ii. Page 48, Please confirm the 5 bus stops along NW 37th Ave between 14th St and NW 19th St will not be impacted by the prohibiting of vehicular game day traffic from using NW 37th Ave between NW 14th St and NW 19th St.
 - d. Trolley

- i. Page vi/14, Please coordinate with City of Miami Trolley and provide a trolley circulation plan map.
- 2) Traffic calming/pedestrian improvements
 - a. Page vi/47, Please provide enhanced crosswalks for the new access at NW 14th St.
 - b. Page 47, It is indicated that the traffic issues in the Grapeland Heights Neighborhood (GHN) are not due to Miami Freedom Park; however, Miami Freedom Park will worsen the existing conditions. Please consider the additional traffic that Miami Freedom Park will generate and adjust the
- 3) Parking recommendations accordingly.
 - a. Page 48, Regarding the topic of how to prevent vehicle from parking within Grapeland Heights Neighborhood (GHN) consider residential parking permits.
 - b. Consider providing separate parking lots for employee and visitors.
 - c. Consider providing separate parking lots for hotel and office use.
- 4) Bike improvements
 - a. Consider providing bicycle racks near the stadium.
 - b. Consider providing incentives to patrons to use bike sharing services to/from the project site.
- 5) Please provide the comprehensive transportation management plan to the City/FDOT for review.
- 6) In reviewing Chapter 3, Exhibits 4 and 5, there appears to be a possible weaving section at the park entrance point from LeJeune Rd, mainly conflicting with the northbound movement coming from NW 14th street. However, it is difficult to conclude the extent and severity of the weave from the graphics provided. Please further explain the weave area and/or provide more detailed graphics in order to ensure there are no safety issues per the current design.

Kenneth Jeffries
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Planning and Environmental Management Office
Florida Department of Transportation, District 6
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