

MIAMIBEACH

City of Miami Beach, 1700 Convention Center Drive, Miami Beach, Florida 33139. www.miamibeachfl.gov

PLANNING DEPARTMENT

Tel: 305-673-7550, Fax: 305-673-7559

October 16, 2019

Florida Department of Transportation, District 6
Planning and Environmental Management Office
Attn: Shereen Yee Fong
Adam Leigh Cann Building
Miami, FL 33172

Re: Response to FDOT Comments for Miami Beach Proposed Amendment for
Accessory Dwelling Units – FDEO#19-02ESR

Dear Ms. Yee Fong:

The City of Miami Beach is in receipt of District 6 of the Florida Department of Transportation's comments regarding a proposed amendment to the City of Miami Beach Comprehensive Plan, dated July 12, 2019, and pertaining to Accessory Dwelling Units. Accessory Dwelling Units is a tool authorized by Section 163.31771, Florida Statutes, for single-family districts in municipalities where there is a shortage of affordable rentals. Miami Beach has a shortage of units that are affordable to the City's workforce, and as such, seeks to allow ADUs in order to assist in addressing this shortage.

The City does not believe that the amendment will not have a significant impact on traffic, in particular on the Florida Strategic Intermodal System (SIS). The proposed ordinance does not increase the development capacity of single-family districts. The areas that can be utilized as ADUs can currently be utilized as guest/servant quarters that are available for family, guests, and staff of the residents of the primary home. As those areas can already be built and occupied, the City does not expect the potential for traffic to be increased beyond what is already authorized. The proposed ordinance simply allows those areas to be leased to people unrelated to the resident of the primary home under specific conditions.

That being said, in an abundance of caution, an analysis of single-family homes was performed by the City of Miami Beach to determine the eligibility for properties to have an accessory dwelling unit. Those that had existing grandfathered ADUs were removed from the calculations. The square footages of homes, pursuant to the Miami-Dade County Property Appraiser, was utilized to determine which homes have sufficient development capacity available to have an ADU. The proposed regulations limit the rental of ADUs to a family unrelated to the family in the primary dwelling only if the property has a homestead exemption, so only those homestead homes were considered for the purpose of the analysis (see attached map indicating parcels utilized for the analysis).

Since the concern of FDOT is related to the impact to the SIS Julia Tuttle Causeway, the analysis looked primarily at homes in the mid-Beach area, which are more likely to use the Julia Tuttle Causeway, as opposed to the other three causeways, to get to the mainland. There is no specific ITE category for accessory dwelling units, as the impact for an accessory dwelling unit is typically considered de minimis; as a result, the trip generation rate for "Residential Condominium/Townhouse (ITE Code 230)" was utilized. The City's 2016 Transportation Master Plan (TMP) indicates that 56% of trips in the City are made in single-occupancy vehicles, so it is

assumed that ADUs will continue this trend, and the potential for vehicle trips is reduced accordingly.

Because this is not a specific development proposal, generalized work trip distribution statistics were taken from the U.S. Census Bureau's, Center for Economic Studies Inflow/Outflow Analysis for all jobs in Miami Beach (see attached reports from the United States Census Bureau). The percentages indicate that 71% of residents are employed outside of the City and that 63% of trips occur in a direction that is likely to use the Julia Tuttle Causeway, and the potential for trips is reduced accordingly (see the table below).

Single Family Homes	4,647	Units
Single Family Homes with Grandfathered ADUs	91	Units
Single Family Homes without ADUs	4,556	Units
Single Family Homes without ADUs with available Unit Size for an ADU	4,163	Units
Homesteaded Single Family Homes without ADUs with available Unit Size for an ADU	3,021	Units
Mid-Beach Homesteaded Single Family Homes without ADUs with available Unit Size for an ADU	1,733	Units
PM Peak Hour Trip Generation Rate for "Residential Condominium/Townhouse" (ITE Code 230)	0.52	Trips/Unit
Potential PM Peak Hour Trips in Mid-Beach if ADUs are built-out	901	Trips
% of employment trips in Private Vehicles per 2016 Transportation Master Plan	56	%
Potential PM Peak Hour Vehicle Trips in Mid-Beach if ADUs are built-out	505	Vehicle Trips
% of residents employed outside of the City per U.S. Census 2015 Employment Statistics	71	%
Potential PM Peak Hour Vehicle Trips leaving the City in Mid-Beach if ADUs are built-out	358	Vehicle Trips
% of employment outside of the City that is to South, Southwest, West, and to the North West over 10 miles	63	%
Potential PM Peak Hour Vehicle Trips using I-195 if Mid-Beach ADUs are built-out	226	Vehicle Trips

The traffic generated by ADUs that would impact the Julia Tuttle Causeway would occur in the off-peak direction. The peak direction in the PM-peak hour is westbound, as commuters leave the City of Miami Beach. The ADUs would generate traffic in the eastbound direction, which has much less traffic in the PM-Peak Hour. In the unlikely scenario that all single-family homes in the mid-beach neighborhood that have the ability to develop an ADU took advantage of this, the maximum potential for peak-hour trips on the Julia Tuttle Causeway would be 226 utilizing existing trends. This represents approximately 4.9% of the 4,532 off-peak direction, peak-hour trips. If the traffic in the off-peak direction were to increase to 4,758 trips, that would remain significantly lower than the peak direction traffic of 5,910 trips. The level of service on the Causeway should remain acceptable (see the table below).

Potential PM Peak Hour Vehicle Trips using I-195 if Mid-Beach ADUs are built-out	226	Vehicle Trips
AADT on I-195/Julia Tuttle Causeway	116,018	Vehicles
Direction Factor (D-Factor)	56.6	%

Peak Hour Factor (K-Factor)	9	%
Peak Hour Direction Trips on I-195	65,666	Vehicles
Peak Direction Peak Hour Trips	5,910	Vehicles
Off-Peak Direction Trips (Affected direction)	50,352	Vehicles
Off-Peak Direction Peak Hour Trips (Affected direction)	4,532	Vehicles
Off-Peak Direction Peak Hour Trips with Additional Trips	4,758	Trips
Peak Hour, Off-Peak Direction Impact	4.9	%

In all likelihood, due to the lack of workforce housing within the City, such units would actually reduce the peak-hour trips on the Julia Tuttle Causeway. Because of the high cost of housing in the City, a majority of the City's workforce lives outside of the City on the mainland where housing is more attainable. This is demonstrated by the U.S. Census statistics which indicate that 46,319 people commute into the City for work and only 9,531 people live and work within the City limits. ADUs are generally rented at lower rates than conventional units, and thus would allow for a greater opportunity for the City's workforce to live within the City limits. Such workers would be able to take advantage of the City's increasing alternatives for mobility pursuant to the City's 2016 TMP, such as trolleys, bike paths, bike-sharing, ride-hailing, pedestrian, and more.

Because such units would be built by single-family homeowners, the City does not expect that there will be a great rush to build such units. Additionally, there may be property tax implications which might inhibit their construction for some longtime homeowners. Since they would likely be built over a long period of time, the City will be able to monitor their use and impacts. The proposed regulations include an annual monitoring provision ensuring that this takes place.

Additionally, the City is moving away from a concurrency system to a mobility fee system, as authorized by Section 163.3180. Under the current concurrency system, existing single-family homes that increase in size are considered to have a de minimis impact and thus are exempt from concurrency mitigation. With the proposed mobility fee, single-family homes that are increasing in unit size (including the addition of an ADUs) between certain thresholds will be subject to the payment of mobility fees which will be utilized to improve the City's transportation network, consistent with the 2016 TMP. The mobility fee structure was incorporated into the Evaluation and Appraisal Review Amendments (DEO Miami Beach 19-03ER), that was recently reviewed by FDOT and expected to be adopted concurrent with this amendment.

The City Commission adopted this amendment at a public hearing on October 16, 2019. It is the hope of the City that this analysis addresses FDOT's concerns regarding the traffic impacts of ADUs. If you have any questions, please direct them to Rogelio Madan at (305) 673-7000 extension 6131 or via email at rmadan@miamibeachfl.gov. Thank you for your assistance in this matter.

Sincerely,



Thomas Mooney, AICP, Director
City of Miami Beach Planning Department

TRM/RAM

ADU I-195 Traffic Analysis



FLORIDA DEPARTMENT OF TRANSPORTATION
TRANSPORTATION STATISTICS OFFICE
200 HIGHEST HOUR REPORT - REPORT TYPE: ALL
YEAR 2018

COUNTY: 87 - MIAMI-DADE
SITE: 0108
DESCRIPTION: SR-112/I-195, 1 MI E OF SR-5/US-1, DADE CO.
LOCATION: 87004000 MILEPOST 3.54
AADT: 116018

VALID DATA
HOURS 7920
DAYS 330
WEEKS 51
MONTHS 12

POSITION	COUNTS					COLLECTION			"D"	"K"
	TOTAL COUNT	LOW DIR	LOW COUNT	HIGH DIR	HIGH COUNT	DAY	DATE	HOURL	FACTOR	FACTOR
45	8458	E	4070	W	4388	FRI	05/11/18	15	51.88	7.29
50	8450	E	3719	W	4731	THU	04/05/18	17	55.99	7.28
55	8441	E	3662	W	4779	FRI	02/23/18	17	56.62	7.28
60	8430	E	3659	W	4771	FRI	08/31/18	16	56.60	7.27
65	8416	E	3625	W	4791	WED	02/28/18	16	56.93	7.25
70	8395	E	3968	W	4427	FRI	10/05/18	18	52.73	7.24
75	8384	E	3615	W	4769	WED	05/09/18	16	56.88	7.23
80	8375	E	3620	W	4755	THU	04/12/18	16	56.78	7.22
85	8373	E	3610	W	4763	FRI	08/24/18	18	56.89	7.22
90	8365	E	3712	W	4653	WED	01/03/18	18	55.62	7.21
95	8354	E	3465	W	4889	TUE	02/13/18	16	58.52	7.20
100	8350	E	4108	W	4242	WED	02/14/18	19	50.80	7.20
105	8343	E	3738	W	4605	FRI	07/13/18	18	55.20	7.19
110	8340	E	3732	W	4608	FRI	12/28/18	17	55.25	7.19
115	8326	E	3521	W	4805	FRI	11/09/18	16	57.71	7.18
120	8319	E	3846	W	4473	WED	12/26/18	18	53.77	7.17
125	8313	E	3482	W	4831	TUE	08/07/18	18	58.11	7.17
130	8305	E	3564	W	4741	THU	03/08/18	17	57.09	7.16
135	8300	E	3611	W	4689	WED	03/28/18	16	56.49	7.15
140	8295	E	3501	W	4794	TUE	04/10/18	16	57.79	7.15
145	8289	E	3932	W	4357	WED	02/14/18	15	52.56	7.14
150	8279	E	3535	W	4744	WED	02/21/18	16	57.30	7.14
155	8275	E	3448	W	4827	TUE	11/13/18	16	58.33	7.13
160	8268	E	3539	W	4729	TUE	05/08/18	17	57.20	7.13
165	8265	E	3550	W	4715	TUE	02/27/18	18	57.05	7.12
170	8259	E	3662	W	4597	FRI	08/03/18	15	55.66	7.12
175	8255	E	3502	W	4753	TUE	02/27/18	17	57.58	7.12
180	8250	E	3982	W	4268	FRI	03/30/18	17	51.73	7.11
185	8245	E	3626	W	4619	TUE	04/03/18	18	56.02	7.11
190	8242	E	3486	W	4756	THU	11/15/18	16	57.70	7.10
195	8235	E	3578	W	4657	FRI	08/03/18	18	56.55	7.10
200	8228	E	3426	W	4802	TUE	02/06/18	16	58.36	7.09

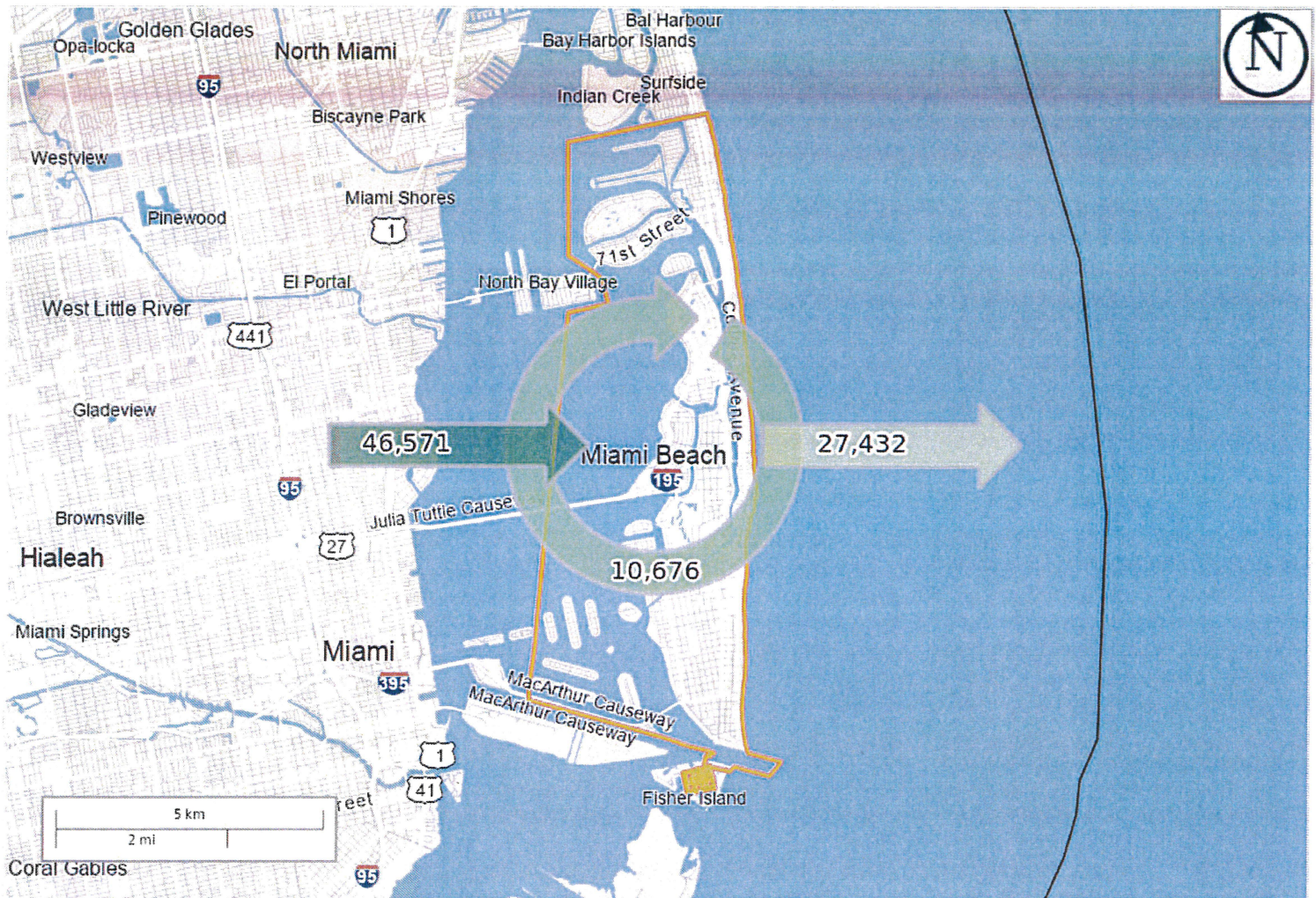
DESIGN HOUR DATA

MEDIAN "D" = 56.6% (MEDIAN D FACTOR OF ALL 200 HIGHEST HOURS)
STANDARD "K" = 9.0%

Inflow/Outflow Report All Jobs for All Workers in 2015

Created by the U.S. Census Bureau's OnTheMap <https://onthemap.ces.census.gov> on 07/16/2019

Inflow/Outflow Counts of All Jobs for Selection Area in 2015 All Workers



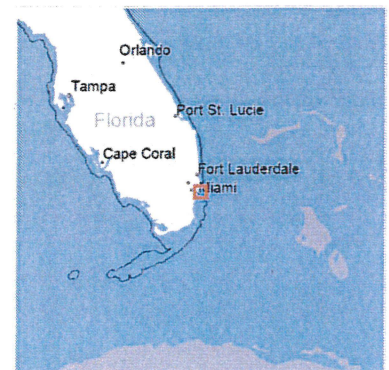
Map Legend

Selection Areas

Analysis Selection

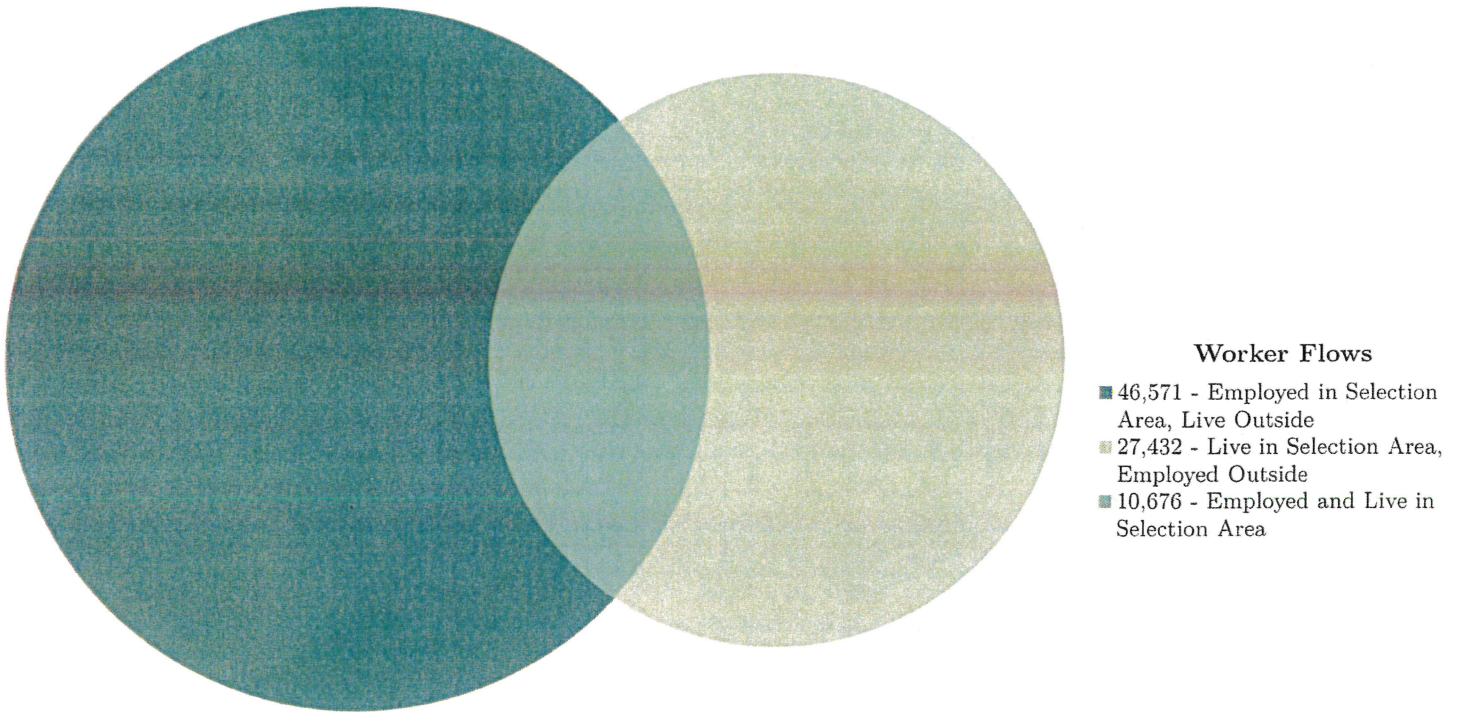
Inflow/Outflow

- ◆ Employed and Live in Selection Area
 - ◆ Employed in Selection Area, Live Outside
 - ◆ Live in Selection Area, Employed Outside
- Note: Overlay arrows do not indicate directionality of worker flow between home and employment locations.



Inflow/Outflow Counts of All Jobs for Selection Area in 2015

All Workers



Inflow/Outflow Counts of All Jobs for Selection Area in 2015

All Workers

Worker Totals and Flows	2015	
	Count	Share
Employed in the Selection Area	57,247	100.0
Employed in the Selection Area but Living Outside	46,571	81.4
Employed and Living in the Selection Area	10,676	18.6
Living in the Selection Area	38,108	100.0
Living in the Selection Area but Employed Outside	27,432	72.0
Living and Employed in the Selection Area	10,676	28.0

Additional Information

Analysis Settings

Analysis Type	Inflow/Outflow
Selection area as	N/A
Year(s)	2015
Job Type	All Jobs
Selection Area	Miami Beach city, FL from Places (Cities, CDPs, etc.)
Selected Census Blocks	973
Analysis Generation Date	07/16/2019 15:05 - OnTheMap 6.6
Code Revision	862b6296f5ebf0d900479b7d896f6536db69dfe7
LODES Data Version	20170818

Data Sources

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2015).

Notes

1. Race, Ethnicity, Educational Attainment, and Sex statistics are beta release results and are not available before 2009.
2. Educational Attainment is only produced for workers aged 30 and over.
3. Firm Age and Firm Size statistics are beta release results for All Private jobs and are not available before 2011.

Distance/Direction Report - Home Census Block to Work Census Block

Job Counts in Work Blocks by Distance Only

2015

	Count	Share
Total All Jobs	38,108	100.0%
Less than 10 miles	22,524	59.1%
10 to 24 miles	10,165	26.7%
25 to 50 miles	2,121	5.6%
Greater than 50 miles	3,298	8.7%

Job Counts in Work Blocks to the North of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	8,827	100.0%
Less than 10 miles	3,239	36.7%
10 to 24 miles	2,391	27.1%
25 to 50 miles	1,734	19.6%
Greater than 50 miles	1,463	16.6%

Job Counts in Work Blocks to the Northeast of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	1,536	100.0%
Less than 10 miles	1,534	99.9%
10 to 24 miles	-	-
25 to 50 miles	-	-
Greater than 50 miles	2	0.1%

⊕ Job Counts in Work Blocks to the East of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	884	100.0%
Less than 10 miles	884	100.0%
10 to 24 miles	-	-
25 to 50 miles	-	-
Greater than 50 miles	-	-

⊕ Job Counts in Work Blocks to the Southeast of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	913	100.0%
Less than 10 miles	913	100.0%
10 to 24 miles	-	-
25 to 50 miles	-	-
Greater than 50 miles	-	-

⊕ Job Counts in Work Blocks to the South of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	4,494	100.0%
Less than 10 miles	4,423	98.4%
10 to 24 miles	41	0.9%
25 to 50 miles	9	0.2%
Greater than 50 miles	21	0.5%

Job Counts in Work Blocks to the Southwest of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	8,209	100.0%
Less than 10 miles	5,249	63.9%
10 to 24 miles	2,672	32.5%
25 to 50 miles	143	1.7%
Greater than 50 miles	145	1.8%

Job Counts in Work Blocks to the West of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	8,109	100.0%
Less than 10 miles	4,513	55.7%
10 to 24 miles	3,305	40.8%
25 to 50 miles	1	0.0%
Greater than 50 miles	290	3.6%

Job Counts in Work Blocks to the Northwest of Home Blocks by Distance

2015

	Count	Share
Total All Jobs	5,136	100.0%
Less than 10 miles	1,769	34.4%
10 to 24 miles	1,756	34.2%
25 to 50 miles	234	4.6%
Greater than 50 miles	1,377	26.8%

Report Settings

Analysis Type	Distance/Direction
Selection area as	Home
Year(s)	2015
Job Type	All Jobs
Selection Area	Miami Beach city, FL from Places (Cities, CDPs, etc.)
Selected Census Blocks	973
Analysis Generation Date	07/18/2019 15:53 - OnTheMap 6.6
Code Revision	862b6296f5ebf0d900479b7d896f6536db69dfe7
LODES Data Version	20170818

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2015).

Notes:

1. Race, Ethnicity, Educational Attainment, and Sex statistics are beta release results and are not available before 2009.
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Distance/Direction Report - Home to Work

All Jobs for All Workers in 2015

Created by the U.S. Census Bureau's OnTheMap <https://onthemap.ces.census.gov> on 07/18/2019

Counts and Density of Work Locations for All Jobs in Home Selection Area in 2015

All Workers



Map Legend

Job Density [Jobs/Sq. Mile]

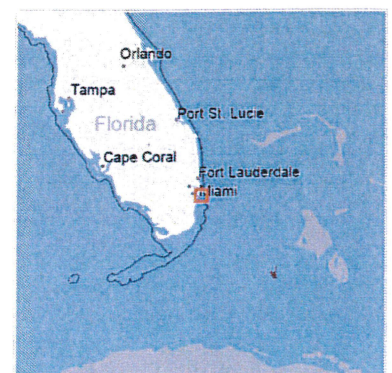
- 5 - 190
- 191 - 748
- 749 - 1,678
- 1,679 - 2,980
- 2,981 - 4,654

Job Count [Jobs/Census Block]

- 1 - 2
- 3 - 18
- 19 - 91
- 92 - 287
- 288 - 700

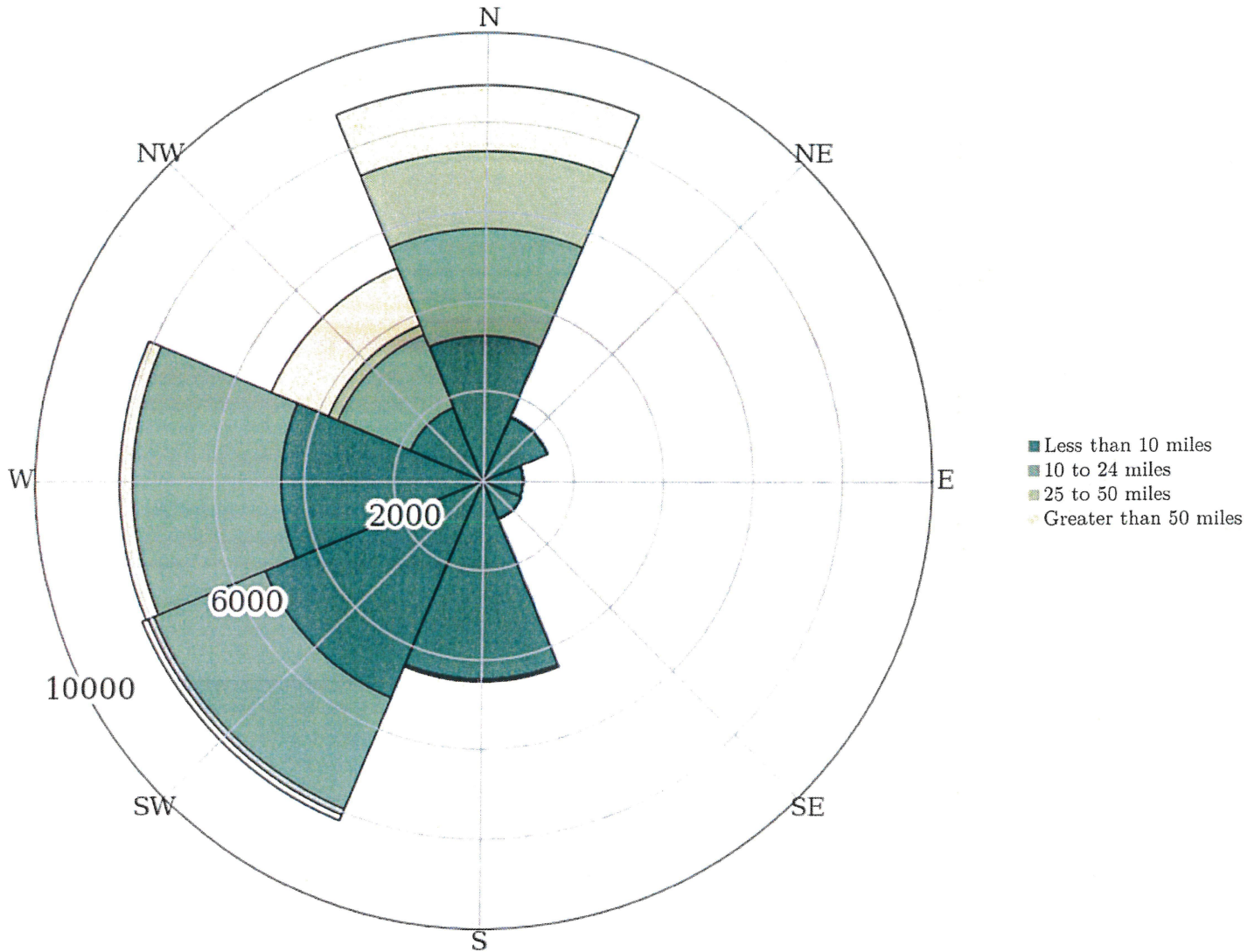
Selection Areas

- 📍 Analysis Selection



All Jobs for All Workers in 2015

Distance and Direction from Home Census Block to Work Census Block, Living in Selection Area



All Jobs for All Workers in 2015

Distance from Home Census Block to Work Census Block, Living in Selection Area

Distance	2015	
	Count	Share
Total All Jobs	38,108	100.0
Less than 10 miles	22,524	59.1
10 to 24 miles	10,165	26.7
25 to 50 miles	2,121	5.6
Greater than 50 miles	3,298	8.7

Additional Information

Analysis Settings

Analysis Type	Distance/Direction
Selection area as	Home
Year(s)	2015
Job Type	All Jobs
Selection Area	Miami Beach city, FL from Places (Cities, CDPs, etc.)
Selected Census Blocks	973
Analysis Generation Date	07/18/2019 15:47 - OnTheMap 6.6
Code Revision	862b6296f5ebf0d900479b7d896f6536db69dfe7
LODES Data Version	20170818

Data Sources

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2015).

Notes

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