



The Florida Legislature

OFFICE OF PROGRAM POLICY ANALYSIS AND GOVERNMENT ACCOUNTABILITY



PK Jameson, Coordinator

March 24, 2022

OPPAGA Transportation Infrastructure Project Questions for the Metropolitan Planning Organizations (MPOs)

The Florida Legislature's Office of Program Policy Analysis and Government Accountability (OPPAGA) has been directed to assess the status and future needs of the roadways for the Florida Turnpike System and the Strategic Intermodal System (SIS). To that end, we are asking for your input on the following questions.

Please note, all responses are exempt from disclosure per s. 11.51(4), Florida Statutes.

Please call Eryn Jones at 850-717-0523 or email her at eryn.jones@oppaga.fl.gov if you have any questions or concerns.

Responding MPO: [Broward Metropolitan Planning Organization \(MPO\)](#) – in blue text

Questionnaire Respondent(s):

1. How does your short and long term planning process differ for different road types such as SIS, Florida Turnpike System, and statewide arterials?

The Broward MPO's Metropolitan Transportation Plan long range planning is accomplished as part of the five-year update of the federally mandated Metropolitan Transportation Plan (MTP). Short range planning is documented in the federally required Transportation Improvement Program (TIP).

The MPO handles the SIS and Florida Turnpike System in an equivalent manner since they are both statewide plans with centralized planning carried out with little input from the MPO. The MPO plays a larger role in planning statewide arterials within the MPO's jurisdiction. For the remainder of this questionnaire statewide led plans (SIS/Turnpike) are separated from statewide arterials (Arterials).

SIS/Turnpike:

Historically, FDOT and FTE have led centralized planning efforts for the SIS and Turnpike, respectively, with the MPO adopting their "cost feasible plans" by reference into the MTP. As of the 2045 MTP, these plans are no longer included by reference to meet FHWA requirements but rather are shown as unique projects – provided to the MPO as prioritized cost feasible lists. As a result, the Broward MPO does not directly identify projects on these facilities through its long- and short-range planning products, but rather, coordinates with the responsible entity on the identified projects.

Arterial:

Conversely, the MPO leads the identification of projects on the statewide arterial system and will directly propose improvements through the MTP Cost Feasible Plan in coordination with FDOT.

- a. At what point(s) in this process is FDOT involved, and what does that involvement entail?

As part of the MTP, FDOT is involved during the initial stages of the plan development process including the MPO's initial "call for projects" for each plan update and subsequent needs assessment process where projects are vetted, prioritized, and allocated funding through the cost feasible plan portion of the MTP.

SIS/Turnpike:

The level of involvement and coordination with FDOT differs for state arterial roadway projects and SIS projects. For SIS projects, FDOT provides the MPO with a list of projects from the FDOT developed and adopted SIS Cost Feasible Plan for inclusion in the final MTP cost feasible plan. The SIS cost feasible project list is incorporated into the MTP cost feasible plan based on the direction provided in the FDOT Revenue Forecasting handbook (see more details in the response to Question 4a below). The projects are included as discrete line-items in the MTP cost feasible plan and require coordination with the MPO if the project needs to be amended based on the thresholds set forth in the "Florida LRTP Amendment Thresholds" document. The inclusion of discrete SIS projects in the MTP cost feasible plan was a recent change required by FHWA (2017) to ensure that the SIS cost feasible plan was not a self-amending plan. This ensures that the MPO Board (and the public) can provide feedback on changes made to the SIS cost feasible plan.

For the SIS projects, FDOT programs SIS funding separate and independent from the MPO's LOPP process – directly allocating funding into FDOT's Draft Tentative Work Program (see more detail in the response to Question 7 below). Projects (SIS, State Arterials, and federally funded off-system roadways) are programmed into FDOT's Draft Tentative Work Program (DTWP) on an annual basis. Historically, FDOT has provided the DTWP to the MPO's for review with a noticeably short review period (sometimes as little as two weeks). Feedback and requests for revision from the MPO are typically provided to FDOT, however, the DTWP approval schedules often do not allow for these comments or changes to be included in the final work program. Once the DTWP has been approved by the MPO Board, the MPO is provided with an annual work program download to create the latest version of the TIP. FDOT reviews the TIP for consistency with the work program and will provide feedback prior to final approval of the TIP by the MPO Board.

Arterial:

For state arterial roadway projects, FDOT proposes candidate projects to the MPO for evaluation and ranking in the final cost feasible plan. The MPO, in collaboration with its agency partners, determines the final selection ranking, and funding allocation for state arterial roadway projects in the MTP.

For the TIP, FDOT coordinates with the MPO annually to program new projects and funding through the required List of Priority Projects (LOPP) process. Like the MTP, the process for state arterial roadway projects and SIS projects differs. The MPO includes state roadway arterial project priorities (identified initially in the MTP cost feasible plan) as part of its LOPP. FDOT then program state funding to those projects in priority order.

Does this process differ for other road projects that cross multiple MPOs and/or FDOT districts?

From an MTP perspective, if a state arterial roadway project extends into another MPO or FDOT district, the MPO will coordinate with each of these entities to ensure consensus and support exists for the project prior to the project's inclusion in the MTP's cost feasible plan. For SIS projects, this coordination is handled by FDOT based on the requirements and process set forth in Section 339.61-65, F.S. The MPO's role in the SIS process for projects that cross multiple MPO and/or FDOT districts is limited to these requirements and largely consists of coordination with Central Office through FDOT's District SIS coordinator.

2. What features of your planning process are unique to your MPO?

As part of the development of the MTP, LOPP, and TIP, the Broward MPO has developed a "program ready" concept which requires that all projects slated to receive federal or state funding through the MPO must have (1) a clear scope of work, (2) a complete cost estimate, (3) resolution of support from the roadway owner and jurisdiction the project resides in, and (4) demonstrate that collaboration has taken place among the project partners (including the public). The "program ready" concept was established by the Broward MPO Board to ensure that projects are ready for implementation and avoid project delays and/or cancellations. Projects must be "program ready" before they are included in the MTP cost feasible plan and remain program ready through the LOPP and TIP programming/implementation process.

The MPO introduced an innovative new format for the LOPP in 2019 that emphasizes transparency and program readiness. Utilizing Microsoft Access's report function, user-friendly reports are customized to provide Board members, general public, and planning partners with critical and clear information. As a result, it supports decision-makers to make informed decisions and facilitates FDOT to program projects. To help municipal partners review and monitor projects in the TIP falling in their jurisdiction, the Broward MPO has been extracting a list of projects for each municipality from the current TIP. The Broward MPO's most recent Multimodal Priorities List (also known as "List of Priority Projects [LOPP]) can be found here: https://browardmpo.org/images/WhatWeDo/TIP/2022_MMPL/MMPL_6-10-2021.pdf

As part of the 2045 MTP development process, the Broward MPO also developed a vision plan, known as Vision 2100, which outlines improvements for Broward's transportation network beyond the federally required 2045 planning horizon year. This includes transit, roadway (arterials and highways), technology, and anticipated changes to land use in response to the stressors of population growth and climate change. The purpose of Vision 2100 is to provide a long-term outlook that can serve as a foundation for all MTP plan updates and aligns the Broward region on key, large transportation objectives from a multimodal perspective. More information can be found here: www.browardvision2100.org

The Broward MPO also utilizes an equity assessment, developed in-house, to identify and analyze transportation projects at a system-wide and project-level. The MPO's Transportation Planning Equity Assessment is incorporated into all of the MPO's plans and programs and serves as a consistent foundation to analyze equity for the Broward MPO. The equity assessment calculates an equity score calculated for each block group based on a statistically driven calculation process using demographic data from the US Census American Community Survey Five-Year Estimates. The demographic data used to develop the composite equity score are all tied to federal non-discrimination authorities, such as Title VI and Environmental Justice (EJ), and include:

- Racial minority
- Ethnic minority
- Youth (10-17 years)
- Older Adults (65 years and older)
- Population below poverty
- Limited English Proficiency (LEP) population

- Population with a disability

More information can be found here: <https://www.browardmpo.org/title-vi-transportation-planning-equity-assessment>

3. What role, if any, does your MPO have in designating new SIS roads in your region?

Legal requirement per Florida Statute:

Section 339.63, F.S. outlines the designation of SIS facilities and states that:

- (1) The initial Strategic Intermodal System shall include all facilities that meet the criteria recommended by the Strategic Intermodal Steering Committee in a report titled “Steering Committee Final Report: Recommendations for Designating Florida’s Strategic Intermodal System” dated December 2002.
- (3) After the initial designation of the Strategic Intermodal System under subsection (1), the department shall, in coordination with the metropolitan planning organizations, local governments, regional planning councils, transportation providers, and affected public agencies, add facilities to or delete facilities from the Strategic Intermodal System described in paragraphs (2)(b) and (c) based upon criteria adopted by the department.

MPO Response:

This process is largely led by FDOT and guided by the “criteria adopted by the department [FDOT]” Broward County and the larger Southeast Florida region as a whole have been for years highly frustrated with the lack of “local” input into this process. Many regional priorities are repeatedly rejected by FDOT by criteria that we believe is inconsistent with legislative intent (see Sept SEFTC letter). As your question indicates, the focus of the SIS is almost exclusively on roads at a time when our regional economy and lack of buildable space suggests investments beyond just roads is necessary to meeting the mobility needs of our region.

Legal Requirement per Florida Statute:

Section 339.64, F.S., requires the Department in coordination with metropolitan planning organizations, regional planning councils, local governments, and other transportation providers, to develop a Strategic Plan. The plan must be consistent with the Florida Transportation Plan (FTP) developed pursuant to Section 339.155, F.S., and must be updated at least once every five years, subsequent to updates of the FTP. This section provides that the plan must address the following:

- Highway corridors established under s. 339.65, F.S.;
- The National Highway System;
- Airport, seaport, and spaceport facilities;
- Rail lines and rail facilities;
- Selected intermodal facilities; passenger and freight terminals; and appropriate components of State Highway System, county road system, city street system, inland waterways, and local public transit systems that serve as existing or planned connectors between components;
- Other existing or planned corridors that serve a statewide or interregional purpose.

Section 339.65, F.S., provides additional guidance relative to the establishment of SIS highway corridors. This section states that SIS highway corridors must include specified components of the State Highway System that meet the criteria adopted by the Department pursuant to Section 339.63, F.S.

MPO Response:

As a result, the Broward MPO has largely worked with FDOT through the District 4 SIS coordinator and Central Office to designate new SIS roads in the region. That said, the requirements for SIS corridors outlined in Section 339 (above) limit the flexibility of MPOs to consider roadways that do not meet the “criteria adopted by the department [FDOT]” and direct SIS funding to meet the MPO region’s specific transportation needs (i.e. in urban areas, critical arterial roadways, and reliever facilities to the highway network). See attached.

4. What factors does your MPO consider to create the Long-Range Transportation Plan?

Legal Requirement per Federal United States Code (USC):

23 USC 450.324 - Development and content of the metropolitan transportation plan

- MTP updated every five (5) years with new twenty (2) year planning horizon
- Multimodal analysis of the transportation network (federal aid facilities, including state roadways)
- Operational and Management strategies
- Congestion Management Strategies
- Transit and Transportation Enhancement Strategies
- Environmental Mitigation Strategies
- Performance Measures and Targets
- Revenue Forecasting and the Development of a Financial Plan for state and federal funding
- Bicycle and Pedestrian Infrastructure including safety

MPO Response:

The process is largely dictated by the federal requirements outlined above, but generally speaking, the MPO serves as the primary agency coordinating the identification of transportation projects funded with state and/or federal transportation dollars. With this perspective, the MPO considers all transportation factors that would impact the Broward region in the next 20 years and beyond including climate change/resiliency sea-level rise, automated/connected/electric/shared vehicles, linkages between housing and transportation, transit, and any other transportation need or stressor impacting the future network. The MPO process includes an extensive outreach to both traditional and non-traditional transportation partners.

a. What considerations are made for SIS roads and Turnpike System roads?

Requirement per FDOT Guidance:

Regarding the SIS, as specified in the [2045 FDOT Revenue Forecasting Handbook](#):

- “The Department [FDOT] is taking the lead in identifying planned projects and programs funded by these major programs: SIS Highways Construction & ROW, Aviation, Rail, and Intermodal Access. SIS Highways Construction & ROW projects planned within metropolitan areas were provided at the same time as the 2040 Revenue Forecast (Page 41)”
- “MPOs are encouraged to review those projects with district staff, identify any projects or areas that require further discussion, and reach agreement with district staff on how those projects will be incorporated in the update of the metropolitan cost feasible plan (Page 41)”
- “Metropolitan plans and programs for SIS Highways should be consistent with the 2045 SIS Highway Cost Feasible Plan, as provided to each MPO (Page A-3)”

MPO Response

To that end, FDOT takes the lead on identifying projects on the SIS and develops the SIS Cost Feasible Plan. Consultation with the MPOs takes place through the statewide SIS Cost Feasible Plan development process and the District staff representatives are responsible for compiling and transmitting comments to Central Office. In the Broward MPO's experience, this feedback loop is generally indirect and, at times, does not provide a platform for meaningful coordination with the Department.

Similarly, the Florida's Turnpike Enterprise (FTE) takes the lead on developing its cost feasible plan and identifies projects for consideration and funding. The Broward MPO coordinates with the FTE during the development of the FTE's Cost Feasible Plan and the MPO's development of its MTP. However, this platform has not provided a process for affecting change in the FTE's project identification and prioritization process. Changes to the timing, funding, and priority of FTE projects is primarily limited to MPO Board action once a project has entered the implementation process and issues arise.

An unfortunate outcome of limited early coordination can result in the MPO Board using what amounts to a veto vote to simply remove a project from the TIP, effectively preventing any federal funds from being utilized on the project. This is a highly undesirable outcome.

5. How does the Long Range Transportation Plan inform the List of Priority Projects (LOPP), especially for SIS roads and Florida Turnpike System Roads?

Legal Requirement per Florida Statute:

Section 339.175 8(b) - The annual list of project priorities must be based upon project selection criteria that, at a minimum, consider the following:

1. The approved MPO. long-range transportation plan;
2. The Strategic Intermodal System Plan developed under s. 339.64.
3. The priorities developed pursuant to s. 339.2819(4).
4. The results of the transportation management systems; and
5. The MPO's public-involvement procedures.

MPO Response:

The Broward MPO's MTP is the first step in the delivery of a federally or state funded project. The priorities set in the MTP's cost feasible plan are directly incorporated into the LOPP. Given that coordination on the SIS projects is limited to the development of the SIS Cost Feasible Plan (see response to Question 4a), the Broward MPO does not formally include the SIS priorities in its LOPP. The same applies to the coordination on Florida Turnpike System Roads.

6. How does your MPO create the LOPP?

Legal Requirements per Florida Statute:

In addition to the criteria mentioned in Question 5 above, Section 339.175 8(a) also states: Each MPO. is responsible for developing, annually, a list of project priorities and a transportation improvement program. The prevailing principles to be considered by each MPO. when developing a list of project priorities and a transportation improvement program are: preserving the existing transportation infrastructure; enhancing Florida's economic competitiveness; and improving travel choices to ensure mobility. The transportation improvement program will be used to initiate federally aided transportation facilities and improvements as well as other transportation facilities and improvements including transit, rail, aviation, spaceport, and port facilities to be funded from the

State Transportation Trust Fund within its metropolitan area in accordance with existing and subsequent federal and state laws and rules and regulations related thereto.

MPO Response:

The Broward MPO works cooperatively with its MPO member governments and partner transportation agencies to develop the LOPP annually. The LOPP serves as a bridge between the MTP and the TIP and provides clear direction to FDOT on priorities for project funding using state and federal dollars directed by the MPO. For more information on the Broward MPO's priorities list and methodology, please refer to the most recently adopted priorities list:

https://browardmpo.org/images/WhatWeDo/TIP/2022_MMPL/MMPL_6-10-2021.pdf

- a. What stakeholders weigh in on the LOPP?

The Broward MPO's Technical Advisory Committee, Citizen's Advisory Committee, MPO Board, partner agencies (Municipalities, FTE), and the public.

- b. What types of information do they provide?

The advisory committees, MPO Board, and public provide feedback on all aspects of the MPO's priorities list including projects, funding, timeframes, and priorities. The advisory committees and MPO Board can vote to amend the funding priorities and provide direction to MPO staff on future funding levels. The FTE provides its project priority list for inclusion as appendices to the MPO's priority list. These priorities are independent from the MPO's priority list.

7. How does the LOPP inform the Transportation Improvement Plan (TIP), especially for SIS roads and Florida Turnpike System Roads?

See response to Question 5 and 4a – the Broward MPO typically does not directly include SIS or Turnpike priority projects in its LOPP since these plans and associated funds are led by FDOT and FTE, respectively. The FTE priority list is included as an attachment and is referenced in an independent section of the MPO's LOPP. Coordination largely takes place during the cost feasible plan development for the SIS and Turnpike and the MTP's cost feasible plan.

8. Are there any plans currently underway in your MPO region (either short- or long-term) for new SIS roads and/or Florida Turnpike System roads?

No

9. For your MPO, how well does coordination with FDOT work for both short-term (5-10 years) and long-term planning (>10 years) for SIS roads and Florida Turnpike roads?

Currently, the process for both short and long-term planning for projects on the SIS and Florida's Turnpike does not allow for the Broward MPO to be directly involved in the designation of SIS facilities and identification of projects on the SIS or Turnpike system. The nature of the existing Florida Statutes establishes FDOT and FTE as the lead agencies for the initial planning, designation, and project identification for SIS and Turnpike projects, respectively.

From a short-term perspective, the existing process only allows SIS and FTE project changes through the MTP amendment process. Until the most recent 2045 MTP, FTE and SIS projects were incorporated by reference and did not require formal MTP amendments when changes were made to these plans and projects. FHWA's guidance to the MPOs this past MTP cycle required that MPOs include SIS and FTE projects discretely in the cost feasible plan and established a marginal "check and balance" system

between the state and the MPO since all project revisions now require an MTP amendment and MPO/public input.

Long-term, the existing process for coordinating projects on the SIS and Turnpike is largely restrictive and narrowly defined by Section 339.61-65. This has prevented MPOs in more urban areas (like the Broward MPO) to define SIS facilities and projects that address the more multimodal nature of future transportation needs in their region. The State takes a homogenous approach to defining the transportation network as part of its SIS planning and does not directly distinguish the unique transportation needs of an urban or rural area. The Southeast Florida Transportation Council (SEFTC), comprised of the Miami-Dade TPO, Broward MPO, and the Palm Beach TPA, recently provided formal feedback on the Draft SIS Policy Plan which expands on these issues. See letter dated September 3, 2021, from SEFTC attached.

- a. How could the coordination with FDOT be improved?

10. How could the planning process be improved?

A portion of the SIS funds should be released back to the TMA sized MPOs in major urbanized areas such as Miami for planning and application to local priorities. Recall that about 20 years ago the state reduced the level of funding available to the MPOs in order to fund a more robust SIS. One consequence was a significant disconnect between statewide SIS planning and local funding needs. See attached SEFTC for more details.

- a. What specific efficiencies would result from your suggested improvements?

Comprehensive planning at MPO level with focus on local priorities consistent with a highly congested region with limited opportunity for traditional road widening. Improved communication between MPOs and FDOT at regional level – statewide approach is not effective.

- b. What potential problems would emerge from such changes?

None, if transition was made over a five-year period to ensure projects in the SIS “pipeline” are not impacted. Is there any way Florida’s process should adapt to better address very long-term needs? Yes, many are addressed in the SEFTC letter attached. FDOT’s approach of reaching out to a handful of regional meetings once every five years to discuss how to run the SIS is inefficient and largely dismisses the MPOs from a significant role – when the MPO’s represent local populations and needs.

11. Would Florida benefit from having an entity outside of FDOT planning major statewide road projects?

A totally new entity is probably not the answer. As mentioned above, pushing more funding and responsibility to the TMA MPOs would be a very cost effective and efficient approach to affect change. If yes, what entity(s) might best serve this purpose? An alternative to a new entity would be the creation of a cross-agency/cross functional team for the specific purpose of SIS planning and prioritization – using existing FDOT, FDOT Districts and MPOs. This could be a team effort and not a top down one size fits all for a state as large and diverse as Florida. The best approach for Chipley is not the best approach for Orlando. A statewide task team that gives a strong voice to the MPOs and replaces the centralized planning would be preferable to another entity.

RE: OPPAGA Infrastructure Project MPO Questionnaire

Date: March 23, 2022

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a. If yes, what might be the pros/cons of having such an entity?

More effective communication and better alignment with MPO and local needs. Leveraging of federal resources now largely required (national competitive grants) by using local and state funds.

b. If no, why not?

RE: OPPAGA Infrastructure Project MPO Questionnaire

Date: March 23, 2022

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ATTACHMENTS



MEMBERS
Oliver G. Gilbert III, Chair
Beam Furr, Vice Chair
Fred Pinto

September 3, 2021

Mr. Brad Thoburn
Assistant Secretary of Strategic Development
Florida Department of Transportation
605 Suwannee Street
Tallahassee, FL 32399-0450

RE: Florida Department of Transportation's Draft Strategic Intermodal System (SIS)

Dear Mr. Thoburn,

The Broward Metropolitan Planning Organization, Miami-Dade Transportation Planning Organization, and Palm Beach Transportation Planning Agency (MPOs) appreciate the opportunity to provide the SIS Implementation Committee comments, input and recommendations as you consider changes to the Strategic Intermodal System's (SIS) Policy Plan.

The MPOs support the Florida Department of Transportation's efforts to update the SIS policies. In fact, the Southeast Florida Transportation Council (SEFTC), a formal partnership of the MPOs to coordinate regional transportation planning for all travel modes, identified policy changes to the SIS as a key policy goal of the unanimously adopted *2045 Regional Transportation Plan* (Attachment A).

While the SIS has helped to connect Florida's urban regions over the nearly twenty years since its inception, we agree the policies must change and adapt to current needs. There are a few key areas we suggest your SIS Policy Team review as opportunities for meaningful positive change: 1) Intercity; 2) Multimodal; and 3) Other as discussed in more detail below.

Include Intercity as Legislatively Intended

The Florida Department of Transportation's (FDOT) interpretation and implementation through FDOT promulgated procedures and policies of the term "interregional" has significantly disadvantaged the Southeast Florida region. FDOT's decision to define the entire Southeast Florida as a single region deemphasized support for the transportation investment needs of over 6 million residents of Southeast Florida. While connections between Southeast Florida and the rest of the state are important, the vast majority of trips (and economic activity) occur within Southeast Florida.

At the August 18, 2021, FDOT Districts 4 & 6 SIS Policy Plan Update meeting, the Department stated it had no intent of opening up the enabling law in Chapter 339 of Florida Statutes. Their stated position is the law predicted the current situation, as s. 339.61(2), F.S. states, "The Legislature also finds that the state's growing regional and *intercity economic centers* (emphasis added) will increase the demand for interregional and *intercity travel...*" We concur this language provides FDOT the flexibility to change their

SIS policies and procedures to include the legislative intent of “intercity” support, which will better support travel within Southeast Florida region. We strongly support this change.

SEFTC has adopted a Regional Corridors Network (Attachment B) and encourages FDOT to recognize improvements to facilities on this network as supporting intercity travel consistent with the SIS legislation and therefore eligible for SIS funding. The network was developed in close coordination with FDOT, is a state requirement, and was accepted by the three member MPOs of SEFTC. This change would significantly improve equity in the use of SIS funds and support MPO identified transportation priorities throughout Southeast Florida. This change only requires FDOT change its current procedures and policies and we strongly support this change.

Include Multimodal

Southeast Florida’s roadway system has largely reached “build-out” and expanding roadway capacity in the traditional sense is no longer financially viable largely due to skyrocketing land acquisition costs. SEFTC’s *2045 Regional Transportation Plan* calls for future growth to be focused around existing and future transit corridors to allow continued economic growth and development. Strong future investment in multimodal transportation that supports intercity travel needs and economic growth will preserve existing road capacity for longer distance trips (i.e., freight) that are not easily shifted to other modes.

We would like to call attention to s. 339.63(2)(e), F.S. which is the final item on the list of interconnected SIS facilities, “Existing or planned facilities that significantly improve the state’s competitive position to compete for the movement of additional goods into and through this state.” As we have looked to compete economically with our peers across the nation and internationally, our business leaders have consistently found our lack of an interconnected multimodal system hinders our ability to attract and capture world class and international businesses. The SIS must begin to support multimodal investment within the Southeast Florida region.

Other Changes

- Going back to 2018, the Southeast Florida Regional Planning Council (SEFTC) submitted resolution 2018-1 (Attachment C) advocating for less restrictive definitions of SIS facilities. SEFTC recommended including multimodal facilities regardless of the size of the adjoining park and ride facilities, facilities which connect to the SIS, multimodal facilities (Metrorail and Tri-Rail) and their stations/hubs into the SIS, and proposed rail expansions, all of which are eligible as stated in law.

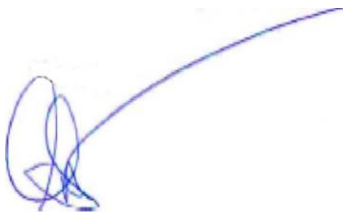
- S. 339.63, F.S. entitled “System facilities designated; additions and deletions” enumerates the process for adding and removing facilities to the SIS. FDOT’s promulgated procedures and policies are far too restrictive and should be expanded to support both Intercity and multimodal systems.
- Lastly, s. 339.63(4), F.S. clarifies the coordination between the State and the MPOs on defining the SIS. We are hopeful this update will seriously consider the input from Southeast Florida’s MPOs and SEFTC and make changes this region has been seeking for the better part of the last decade. As FDOT is aware, the Federal Highway Administration now requires each individual SIS project be adopted and approved by an MPO, in part to address previously limited coordination on SIS priorities with the MPOs.

We appreciate your efforts as Chair of the FTP Implementation Committee and welcome the opportunity to collaborate on how half of Florida’s transportation capacity dollars are invested through the SIS for the benefit of all Floridians. We hope you find these comments and attached documents helpful and consider sharing them with your Implementation Committee. We are of course available to discuss these issues with you, members of the Implementation Committee or others you feel helpful.

Sincerely,



Aileen Boucle
Executive Director
Miami-Dade TPO



Gregory Stuart
Executive Director
Broward MPO



Nick Uhren, PE
Executive Director
Palm Beach TPA

Enclosure



MEMBERS
Oliver G. Gilbert III, Chair
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Fred Pinto

Cc: (Via email)
Oliver G. Gilbert III, Chair, SEFTC
Beam Furr, Vice Chair, SEFTC
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Andra Cornelius, CareerSource Florida, Senior Vice President, Business & Workforce Development
Jamie Christian, Federal Highway Administration, Division Administrator
Michael Stewart, Florida Airports Council, Director External Affairs, Jacksonville Aviation Authority
The Honorable Doug Smith, Florida Association of Counties, Commissioner, Martin County
Chris Emmanuel, Florida Chamber of Commerce, Director of Infrastructure and Governance Policy
David Darm, Florida Commission for the Transportation Disadvantaged, Executive Director
Eric Frey, Florida Council of 100, Policy Analyst
Beth Medina, Florida Defense Alliance, Executive Director
Ryan Fierst, Florida Department of Economic Opportunity, Staff Director, Division of Strategic Business Development
James Stansbury, Florida Department of Economic Opportunity, Bureau Chief, Community Planning and Growth
Chris Stahl, Florida Department of Environmental Protection, Clearinghouse Coordinator, Office of Intergovernmental Programs
Ursula Weiss, Florida Department of Health, Bureau Chief, Community Health Assessment
Lt. Col. Troy Thompson, Florida Department of Highway Safety and Motor Vehicles, Florida Highway Patrol, Deputy Director
Lucienne Peters, Florida Economic Development Council, Vice Chair of Membership and Regional Strategies
The Honorable Matthew Surrency, Florida League of Cities, Mayor, City of Hawthorne
Doug Wheeler, Florida Ports Council, President and CEO
Karen Deigl, Florida Public Transportation Association, Operator of the Year; Indian River/GoLine, President and CEO
Craig Camuso, Florida Railroad Association, CSX Regional Vice President State Government Affairs
Pat Steed, Florida Regional Councils Association, Executive Director, Central Florida RPC
Ananth Prasad, Florida Transportation Builders Association, Executive Director
Teresa Sarnoff, Florida Transportation Commission, Commissioner



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Sally Patrenos, Floridians for Better Transportation, President
Greg Slay, Metropolitan Planning Organization (MPO) Advisory Council, Staff Directors' Advisory Committee Member, Executive Director, Capital Region Transportation Planning Agency
Ken Bryan, Rails-to-Trails Conservancy, State Director
Chris Doolin, Small County Coalition, Government Relations consultant
Mark Bontrager, Space Florida, Vice President, Spaceport Operations
Sean Parks, Transportation and Expressway Authority Membership (TEAM) Florida, Vice Chair, Central Florida Expressway Authority, Lake County Representative
Janet Bowman, The Nature Conservancy, Senior Policy Advisor
John Renne, ULI Florida, Mobility Committee chair
Katie Juckett, Visit Florida, Legislative Affairs Director
RTTAC Members



Metropolitan Planning Organization

Move People & Goods | Create Jobs | Strengthen Communities

January 7, 2022

Mr. Gerald Goosby
SIS Planning Manager
Florida Department of Transportation
605 Suwannee Street
Tallahassee, FL 32399-0450

On behalf of the Broward Metropolitan Planning Organization I thank you for the opportunity to comment on the SIS Policy Update. On September 3, 2021 the Southeast Florida Transportation Council (SEFTC) representing the Miami-Dade TPO, Broward MPO, and Palm Beach TPA submitted a joint letter (attached) enumerating the policy area modifications which would provide meaningful change in our shared region: 1) Include Intercity as Legislatively Intended; 2) Include Multimodal; and 3) less restrict definition of SIS facilities, and further collaboration and input from MPOs.

The policy document is littered with future tense action verbs that do not show a policy change, but the promise of a potential change. It does not provide MPOs any guidance on new policies. There are no goals and time periods listed for when new policies will be developed, nor is there an outreach plan. This document acknowledges our collected concerns but does not address them.

Edits/Changes

In stances where a policy is to be created at a later date, I request that the Metropolitan Planning Organizations are involved in the development process by actively participating in the drafting and review of new policies.

The document is not coordinated in its approach to change. There are sections which act in a vacuum and are independent of seemingly complimentary functions. Page 3 of the DRAFT SIS Policy Plan summarizes the three main policy updates to be taken on by the Department:

Redefining "Capacity."

Broaden the meaning of the term from traditional physical capacity (adding lanes) to increasing the variety of approaches for identifying and enhancing throughput. This plan redefines "capacity" for the SIS as increasing throughput of people and freight. It also recognizes the importance of maintaining capacity over time by planning and adapting infrastructure in preparation for extreme weather events, coastal and inland flooding, and other hazards.

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Comments:

Though the text acknowledges valuing throughput of people over vehicles, page 17 contradicts that point by only listing motorized travel methods as “multi-modal”. Not only is this limiting, but it also contradicts the concept of increased flexibility where SIS could be spent off-system (see below).

Regarding adapting infrastructure for extreme weather, the document is silent as to what exactly that means, how the planning process is to account for extreme weather, and per page 17 appears to be an excuse to use capacity funds to supplant resurfacing funds.

Edits/Changes:

We suggest defining multi-modal to include all modes of travel as SIS connectors would be eligible for bike and ped improvements, as well as emerging technologies. By expanding the definition now and clearly in the document, MPOs can begin to explore projects which complement the SIS. This definition should be published in the SIS Policy Document before final adoption.

The MPO would like to see a defined process for assessing infrastructure adaptations which actively includes the MPOs explained with a timeline for completion.

Increasing flexibility in how the SIS is implemented.

Recognizing the unique needs of major urban, developing urban, and rural areas across the state, this plan commits to updating project eligibility guidance and prioritization processes. This will allow the SIS to balance regional and local needs with interregional and statewide travel through a holistic approach. As part of this shift, FDOT will explore how to provide for greater flexibility in its investment decision-making process to advance quick-response, emerging mobility, and safety solutions on SIS facilities. The Department will also provide greater flexibility for funding improvements on regionally significant facilities not designated as part of the SIS that would improve the overall performance of the SIS facility.

Comments:

339.61(2), F.S. states, “The Legislature also finds that the state’s growing regional and intercity economic centers (emphasis added) will increase the demand for interregional and intercity travel...” is quite clear on the definition of interregional, and therefore needs no further clarity. Instead we recommend adhering to the law as written as stated on page 19 “Clarify the definition of interregional, consistent with statute.”

Providing greater flexibility for off system projects is supported by the MPOs. Once again, this document does not provide a description of the mechanism to apply SIS funds off-system. More clarity is needed.

Edits/Changes:

We commend the introduction of a pilot program to develop criteria for use of SIS funds to “accommodate regional and local trips and provide alternatives to congested SIS corridors.” Additionally, this could be taken on at the regional level through the upcoming 2050 Regional Transportation Plan.



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Improving the balance between statewide and regional needs and priorities.

This approach will reaffirm the statutory intent of focusing SIS designations on facilities vital to statewide and interregional travel. The plan highlights the importance of collaborative planning to identify strategies and projects that advance both statewide and regional goals such as reducing congestion and delay in urban areas and improving connectivity in rural areas. Additional strategies might include creating the foundation for an interconnected statewide passenger rail and transit system that could provide more options for long-distance trips.

Comments:

The first sentence contradicts the previous paragraph on increasing flexibility. Regarding page 19, "Clarify the definition of interregional, consistent with statute.", the statute also states the importance of travel between economic centers, of which several may exist in a single region. Page 19, goes on to promise potential strategies to develop projects, but there are no policies to apply.

Edits/Changes:

We support the use of economic centers as interregional and will even take on the responsibility of defining economic centers either through the Long Range Transportation Plan or through the Regional Transportation Plan in a similar way to how the regional network is defined for Transportation Regional Incentives Program funding eligibility.

Define "fixed guideway transit" in the policy document to align MPO Long Range Transportation Planning with the State's goals. By not having a definition in this document, precious time and efforts will be lost.

Once again, we thank you for the opportunity to participate in the SIS Policy Process and look forward to having our comment incorporated into the final document.

Sincerely,

A handwritten signature in blue ink, appearing to be "Gregory Stuart". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Gregory Stuart
Executive Director
Broward MPO

Enclosure



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Cc: (Via email)
Aileen Bouclé
Valerie Neilson
Gerry O'Reilly