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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.

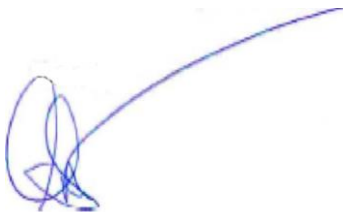
- S. 339.63, F.S. entitled “System facilities designated; additions and deletions” enumerates the process for adding and removing facilities to the SIS. FDOT’s promulgated procedures and policies are far too restrictive and should be expanded to support both Intercity and multimodal systems.
- Lastly, 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



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Cc: (Via email)
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Jamie Christian, Federal Highway Administration, Division Administrator
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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
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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
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Teresa Sarnoff, Florida Transportation Commission, Commissioner



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Ken Bryan, Rails-to-Trails Conservancy, State Director
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