



Metropolitan Planning Organization

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January 7, 2022

Mr. Gerald Goosby
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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