

ITEM #73

**ADDITIONAL MATERIAL
10:00 A.M. REGULAR MEETING**

JUNE 13, 2017

**SUBMITTED AT THE REQUEST OF
COMMISSIONER DALE V.C. HOLNESS**

From: Marie Huntley <mhuntleyocl@gmail.com>
Sent: Monday, June 12, 2017 2:24 PM
To: Rich, Nan; Bogen, Mark; Udine, Michael; Lamarca, Chip; Geller, Steve; Furr, Beam; Ryan, Tim; Sharief, Barbara; Holness, Dale; Henry, Bertha; victoria.smith@dot.state.fl.us; Brittany Wallman; rohara@sunsentinel.com; Sue Gallagher; doretha.foster@dot.gov; eichelbaum@marketingdevelopments.com; al_calloway@verizon.net; Naomi Cobb; Frank Schnidman; Richards, Heidi; caldeal@gate.net; browardbeat@hotmail.com; Scott Strawbridge
Subject: Request for Master Transit Equity Analysis

June 11, 2017

To: Broward County Board of County Commissioners
Re: WAVE Streetcar – Request for Further Equity Analysis
Via: Email

Dear Broward County Board of County Commissioners:

PLEASE REVIEW LINK WITH INFORMATION:

<https://drive.google.com/drive/folders/0B5mQ8HNVKPgkbERhOGFoVXIYSzA?usp=sharing>

As you know, Broward County has an item related to the WAVE Streetcar on your June 13, 2017 Commission Agenda. As stated in your backup:

"This item is in furtherance of the Board's Value of "Cooperatively delivering an efficient and accessible regional intermodal transportation system" and the attendant Goal to, "Implement the Wave Streetcar project while seeking local, state, federal funding and public support for rail projects that connect to existing rail corridors, balancing ridership with community redevelopment demands."

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Home Beautiful Park Civic Association is located within the City of Fort Lauderdale's Northwest Progresso Flagler Heights Community Redevelopment Area. Along with other sources, our CRA Redevelopment Trust Funds are being used to capitalize the proposed WAVE Streetcar Loop segment, and to subsidize operating costs of our existing Sun Trolley/TMA local Community Bus System.

The Home Beautiful Park Civic Association membership has grown concerned that existing and proposed community transit routes, fares, and funding schemes may tend to favor higher-income transit riders over lower-income transit riders, and white riders over black riders.

Our neighbors are further concerned that those people of color and people with disabilities who are disproportionately poor, and concentrated in the Northwest CRA and the 33311 zip code, bear the brunt of these transit trends. This in turn affects our ability to access jobs, education,

nutritious foods, preventive health care, and other social necessities. For this reason alone, transit investment options bear consideration beyond that of headways, route efficiencies, and future real estate development opportunities.

Home Beautiful believes that lower-income and disabled riders might now, or in the future be directly or indirectly subsidizing the trips of higher-income riders and/or being asked to accept lesser service in the interest of furthering premium transit options in other parts of the community. For example: Sun Trolley and CRA documents suggest that the CRA pays 100% of the operating cost share of the Sun Trolley route within its boundaries and 100% of the capital cost for the WAVE Loop. This effectively frees up County gas tax, Federal funds, grants and sponsorship funds to pay for transit enhancements in more affluent areas and outside CRA boundaries

The City of Fort Lauderdale is currently proposing route truncation and fare increases for the Community Link Bus service in the Northwest that would connect us to the WAVE and other regional transit options. Home Beautiful wonders if there may be potential disparate benefits and burdens that have not been considered in a full community context.

Home Beautiful is deeply concerned that the **Fort Lauderdale CRA Board of Commissioners unlawfully encumbered our CRA Redevelopment Trust Fund with a \$7.5 million debt to provide advance funding for 100% of the WAVE Loop Expansion.** Florida Law prohibits CRA's from allocating CRA funds for projects not contemplated in their adopted redevelopment plan. The approved and adopted CRA Redevelopment Plan contained no language that suggested the CRA would invest in mass transit of any type. Further, the plan relied upon outdated (1990) Census Data.

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Public input on the NW CRA Redevelopment Plan Amendment was not taken until long after the debt for the Wave Loop was incurred. Our right to due process was not respected. We don't believe those most vulnerable were sufficiently engaged during the CRA or NEPA approval processes. Public comments were immaterial to the Board's decision to amend the Redevelopment Plan, as the \$7.5 mm CRA WAVE Loop debt was obligated long before the CRA Plan was presented to our community.

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The WAVE's environmental consultant determined in the NEPA documents that the WAVE Loop extension would provide a positive impact stating: **“the low-income population will be provided greater access to the Wave Streetcar system and connectivity to destinations and employment opportunities along the alignment.”**

In February 2016 Fort Lauderdale City Manager Lee Feldman told the Broward County Board of Commissioners: **“We did not do a study for the ridership of the (WAVE) Northern Loop.”**

Home Beautiful does not understand how such a significant route amendment was designed and fully funded without the benefit of a ridership study. We are seeking assurances that no decisions have been made without a full understanding of the Environmental Justice and Title VI implications of this community investment.

By Federal standards, Environmental Justice should be considered in all NEPA decision-making. Our local standards are no different. Broward County recently adopted the following policy; we think it applies to your decision to move forward with FDOT.

ENVIRONMENTAL JUSTICE

POLICY 2.36.1 For local and regional land use policy and public infrastructure and services decisions, local governments and agencies should ensure environmental justice when considering the impacts to vulnerable populations, including but not limited to, the economically disadvantaged, racial and ethnic minorities, the uninsured, low-income children, the elderly, the homeless and those with chronic health conditions, including severe mental illness.

Home Beautiful has been told that our Community Bus routes might be running on a “wave

and ride” basis to avoid substantive compliance with an ADA consent decree the City of Fort Lauderdale entered into in 2003. As the Trolley service is anticipated to be our principal link to the WAVE, we are seeking assurances that the needs of the disabled are being taken into account across the transit network.

Our CRA Redevelopment Trust funds, County Transit funds, and Federal funds are tied up in the WAVE project and the greater mobility network. Home Beautiful is calling upon the City of Fort Lauderdale and Broward County to give further consideration to the benefits and burdens that will result from your actions. This evolving project warrants ongoing consideration of Title VI and Environmental Justice implications along with greater consideration of our existing community conditions.

Public transit is not an amenity or a trophy project for our neighbors, it is a daily necessity that is vital to our ability to live healthy and successful lives. Transit providers’ responsibilities to engage environmental justice populations do not end with the completion of any long-range plan, fare amendments, local plans, etc. Regular and open dialogue is vital to preserving the rights of those populations. So too is the continued study of community conditions, and the tracking of performance and outcomes across our community’s transit network.

Please delay approval of the pending WAVE contract amendments and direct your Staff to work with the City of Fort Lauderdale in the interest of allowing our community the benefit of more substantial understanding of potential Title VI, ADA, and Environmental Justice, and legal impacts related to this important community project. Thorough, meaningful, and continuous equity analysis is warranted.

Thanks for your service. Please let us know if you have any questions.

Sincerely yours;

Marie “Miss Peaches” Huntley, Pres.

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