SOUTH FLORIDA
WILDLANDS ASSOCIATION

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Mayra Diaz
Miami Dade Expressway Authority
3790 NW 21 Street
Miami, FL 33142

Via electronic submission to: tgarcia@mdxway.com

Dear Ms. Diaz:

South Florida Wildlands Association (SFWA) recently provided oral comments at the public meeting in Kendall on the SR 836/Dolphin Expressway Southwest Extension (Kendall Parkway) Project. We appreciate the opportunity to provide some brief additional comments here as well.

Founded in 2010, SFWA is a local non-profit dedicated to the protection of wildlife and habitat in the Greater Everglades. However, we are also aware that the needs of healthy ecosystems go hand-in-hand with a healthy human environment.

At the recent public meeting and at several meetings held at the Miami-Dade County Commission Chambers, we have heard the desires of residents for this highway. Their commutes are nightmares and they are looking for a quick solution. Unfortunately, the 836 extension is not it.

We strongly believe that this project will greatly increase traffic on the existing 836 through funneling the growing population which surrounds the new 14-mile corridor onto the current highway. Not only is that population presently expanding – but it will grow even more with the added capacity this new highway will provide. There is a housing shortage in Miami – and developers realize that there is an enormous amount of money to be made by increasing the level of density in western Miami-Dade. Local developers have also been relentless in pushing for the westward expansion of the county's Urban Development Boundary (UDB). This project is a prime example of that push – and referring to it as "infrastructure" as opposed to "development" appears to be a semantic work-around for a project which ordinarily could not be built according to the restrictions of the County's UDB.

As we stated during several meetings on this topic, the best way to alleviate traffic problems on the expressway is to move vehicles off of highways. City after city around the globe has faced this same problem – congestion on area roads caused by simple lack of capacity – area roads are not large enough to handle the number of vehicles. The 836 during morning and evening rush-hour simply cannot handle the level of traffic it is being forced to carry. But most metropolitan areas now turn to greatly expanded mass transit as the solution.

As I said at the previous meeting, some cities had the foresight to build mass transit into their growth models. Boston and New York City are two examples of that. Rail lines were built into urban areas – but also into areas that were not even developed yet. Communities developed along those lines with stations becoming the center for new neighborhoods. Other cities such as Bangkok, Thailand, Taipei, Taiwan, and Washington D.C. built extensive urban rail systems on top of existing dense cities. In both scenarios, significant investments of public funds were made for the purpose of a better-functioning city and a better quality of life for visitors and residents alike.

Miami-Dade County is by far the largest county in the state of Florida population-wise. It is also the hub of the Miami Metropolitan Area – the 7th largest metropolitan area in the United States and the second largest in the southeast United States. The City of Miami's skyline has shot up to become the third largest in the U.S. following New York City and Chicago. It seems that all that growth should have generated by now a system of mass transit equal to Miami-Dade's growing population and status as a true "world-city" – a term that is tossed around a lot these days. Yet a quick look at the chart provided in this article shows that even with vastly over-crowded roads and highways and horrible commute times (even for short distances), Miami-Dade's anemic Metrorail has by far the lowest ridership of the 10 largest urban rail systems in the U.S. – as well as one of the shortest lengths – just 24.4 miles. Recent decisions not to fund the extension of the Metrorail line south to Homestead or to fund with a specified budget its extension north to the county line, only underscore this region's lack of commitment when it comes to mass transit.

https://en.wikipedia.org/wiki/List_of_United_States_rapid_transit_systems_by_ridership

A major problem with the current system is that, unless you're lucky enough to live and work within walking distance to Metrorail – the commute can involve a complex combination of Metrorail and buses to get you to and from work. And with connections and long wait-times, commutes can total hours in each direction. It is simply an unworkable system – and forces even poor residents to try and purchase and maintain a vehicle they can ill-afford. Many of these residents are only one major vehicle repair away from being back on Miami-Dade's poor system of mass-transit.

We can also point out that, compared to single-occupant commutes by car – by far the most common commute in Miami-Dade – rail lines are much greener with respect to carbon emissions. According to this review (see link below), .14 pounds per mile for heavy rail (such as Miami-Dade's Metrorail) vs. .89 pounds per mile for a single-occupancy vehicle. Or almost 5 times more for vehicle vs. train. The article also makes this interesting observation about the type of growth fostered by an extensive mass transit system – and what it means for quality of life for residents:

https://www.citylab.com/transportation/2012/11/can-we-please-stop-pretending-cars-are-greener-transit/3960/

"This chart doesn't even take into consideration the fact that transit often begets sustainable land development. Highway building tends to promote a vicious transport circle: the more lanes you create, the more latent demand you invite. Transit creation, meanwhile, tends to partner with high-density, mixed-use development that promotes a culture of walking, biking, and alternative transport in general. Non-rider residents of a transit-oriented area still often end up driving less than they might otherwise, because their desired destinations are built closer together."

The above is an excellent lesson which residents who live near downtown Miami (and can afford it) are well aware of. And there are no examples anywhere in fast-growth Florida where a new expressway didn't quickly reach traffic capacity. Growth begets growth – and sprawl begets sprawl. I-595 was built not that long ago through low-density and even agricultural sections of western Broward County. Massive growth in that part of the South Florida illustrates the impact I-595 had. We should have learned that lesson by now.

We also take issue with comments that were made by representatives from MDX that money from tolls are "completely separate" and cannot be used to fund mass transit projects. That appears to be contradicted by this section of the Florida Expressway Authority Act - see 348.0004(8):

"In any county as defined in s. 125.011(1), an expressway authority may finance or refinance the planning, design, acquisition, construction, extension, rehabilitation, equipping, preservation, maintenance, or improvement of a public transportation facility or transportation facilities owned or operated by such county, an intermodal facility or facilities, multimodal corridor or corridors, including, but not limited to, bicycle facilities or greenways that will improve transportation services within the county, or any programs or projects that will improve the levels of service on an expressway system, subject to approval of the governing body of such county after public hearing."

Nothing "will improve transportation services within the county" or "improve the levels of service on an expressway system" like replacing vehicle commutes with mass transit in Miami-Dade County. Toll money from MDX should be used accordingly.

Other concerns we have which has led to SFWA's opposition to this project have already been well-covered by numerous environmental organizations within this community. We quote our partner organization on this project, Tropical Audubon, and simply bring these points to your attention:

· Endanger Freshwater Resources. The road itself stretches over a large portion of our West Wellfield, an area where surface water and drinking water intermix most heavily, threatening to pollute and deplete the drinking water resources of the very residents this road is meant to serve.

· Harm Important Everglades restoration projects. The Bird Drive Basin project, a component of the Comprehensive Everglades Restoration Plan (CERP) is set to reduce seepage from Everglades National Park, recharge one of the county's largest sources of underground drinking water and extend wetlands that serve as a buffer zone for Miami-Dade County. This proposed expansion would interfere with this crucial project.

· Increase tolls. Residents who live west of I-95 pay the most tolls in Miami-Dade County, paying more than anyone — even tourists — to get to the urban core, or the coast.

· Be Financially Irresponsible. Tolls have not yet paid for Florida highways. How is this different? There is no proposed plan, and no precedence of success in the state of Florida. How is this to be achieved?

· Promote Sprawl. With the numbers of residents moving to Miami-Dade County each year — and based on what we can sustain — westward expansion is not the answer. To say that there will be no more development around the road is a fallacy. Studies show that growth begets growth.

· Place the Resilience of Miami-Dade County at risk. Wetlands serve as a natural buffer to natural disasters such as hurricanes and sea level rise. Building more roads goes against science.

· Set Precedent. Allowing this project to move ahead sets the precedent of going "just a little more" westward, and distracts from the implementation of SMART GROWTH Plan solutions.

To the above we would add that the location of the 836 Extension brings a massive new highway very close to the Everglades and Everglades National Park. Impacts to the ecosystem not already mentioned are the increase in light pollution severe impacts from road-runoff (e.g., rubber, paint, exhaust, metal, oil, gasoline, anti-freeze) to the ecology of this highly sensitive area. Though this article from the current Environmental Protection Agency website has been "archived" – it is still available for public viewing and contains valuable information on a topic which should be considered in any evaluation of his project.

https://archive.epa.gov/owow/NPS/roads.html

We would also strongly invite you to speak at length with the Miami-Dade County's Office of Resilience about this project for much more detailed discussion on the impacts of developing wetlands in the western part of the county. This office is well aware of the critical role the wetlands which would be impacted by this project play in aquifer recharge, preventing salt-water intrusion into the Biscayne Aquifer, flood control, and other key functions. They can also explain to you the likely (and soon-to-come) impacts from climate change to this low-lying section of the county. More information on this office along with their contact information can be found here:

https://www.miamidade.gov/planning/resilience.asp

In short, we believe this project involves destruction and degradation of vital wetlands and will facilitate dense suburban growth in close proximity to Everglades National Park. It also uses financial resources which would be much better invested in the creation of viable mass transit which would serve the entire population of Miami-Dade County.

Best regards and best wishes for the New Year,

Matthew Schwartz
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