

**City of Coral Gables:
Temporary Trolley Maintenance
and Storage Facility
Title VI Equity Analysis**

March 2015

Completed by: **RS&H**

Completed for: The City of Coral Gables, Florida

Introduction

This report has been developed as part of a Title VI compliance plan developed by the City of Coral Gables (“Coral Gables”) and City of Miami (“Miami”), in coordination with Miami-Dade Transit (“MDT”) for property to serve as the Coral Gables Trolley Maintenance and Storage Facility (“the Facility”). The Facility provides storage and maintenance capabilities for the Coral Gables Trolley, which is a free service provided by the City of Coral Gables and assisted by the Miami-Dade County Half Penny Transportation Surtax, the Florida Department of Transportation, and the Miami-Dade Metropolitan Planning Organization. The north/south trolley route runs along Ponce de Leon Boulevard from the Douglas Metrorail Station to Flagler Street.

The property site proposed to house the new facility (“the proposed Facility”) is located at 525 South Dixie Highway in the Riviera neighborhood of Coral Gables near the intersection of Riviera Drive and Dixie Highway. The proposed Facility would replace the existing Trolley Maintenance and Storage Facility located at 4133 South Le Jeune Road (“the South Le Jeune Road Facility”). While the proposed facility is being designed and constructed, the City must use a temporary site to maintain and store the trolley vehicles until the new facility is completed.

Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” Per FTA C 4702.1B, Chapter III, “Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.” Also per FTA C 4702.1B, a Title VI equity analysis shall be completed “during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.”

The purpose of this study was to perform a Title VI equity analysis to determine whether and to what extent the location of a temporary site has a disparate impact on the surrounding residents. The objective of the analysis is to compare the equity impacts of two temporary site options relative to each other.

Background

In 2010, the City of Coral Gables entered into an exchange agreement with Astor Development Group (“Astor”). As part of the 2010 agreement, the City agreed to convey the property which contained the South Le Jeune Road Facility to Astor, which planned to build a condominium project on that site and an adjacent site. In exchange for the City’s conveyance of the site, Astor agreed to build the City a new trolley maintenance and storage facility on an alternative site. The new trolley facility built by Astor was on a site located within the City of Miami.

Subsequently, a member of the public filed a discrimination complaint with the Federal Transit Administration (“FTA”) about the City of Miami trolley facility, asserting a violation of Title VI of the Civil

Rights Act of 1964 (“Title VI”). The FTA commenced an investigation of the City, the City of Miami and Miami-Dade County. After the discrimination complaint was filed, the City filed a lawsuit against Astor concerning the 2010 land exchange agreement and the placement of the new trolley facility.

In 2014, the discrimination complaint with the FTA was resolved. As part of this resolution, the City agreed that it would adopt a Title VI program plan (which was approved by the City on June 25, 2014) and that it not move its trolley operations to the City of Miami site, but instead would select an alternative site. Additionally, the City agreed that it would not take possession of or use the City of Miami site for any other purpose.

Pursuant to a September 17, 2014 settlement agreement with Astor, the City sold the property containing its current trolley facility the South Le Jeune Road Facility to Astor in exchange for a monetary amount, which the City will use toward the construction of a new permanent trolley facility.

The new facility cannot be completed before the deadline for the City to vacate the South Le Jeune Road Facility, which may be as early as April 15, 2015. As a result, the City will require a temporary location for the maintenance and storage of its eleven (11) trolleys. The City anticipates using the temporary location for approximately one (1) year, with the possibility of an extension for an additional one (1) year, after which it will move its maintenance and storage operations to the new permanent facility. The trolley dispatchers and trolley supervisor will not move to the temporary location, but rather will operate from a location within the City.

Methodology

The steps outlined in this section were completed to find the temporary site and evaluate potential impacts. First, Coral Gables established preliminary criteria required for the temporary site candidates, and evaluated various potential sites based on these criteria. Second, potential impacts to the surrounding community were identified based on the operational characteristics of the trolleys in relation to the temporary sites. Third, an analysis area was defined through coordination with FTA to encompass anticipated impacts related to the use of the temporary sites. Finally, the minority composition of the analysis area was calculated and compared to that of the comparison population for each temporary site to determine if a disparate impact exists.

Identification of Siting Alternatives

Because the City may have to vacate the South Le Jeune Road Facility as early as April 15, 2015, the City determined that the temporary site must be immediately available to house the City's trolley storage and maintenance operations. The City further determined that there were no such sites within the City itself, so City staff looked for sites outside of the City that would satisfy these criteria:

1. **Use:** Due to the City's time constraints, the temporary site needed to include a vehicle maintenance facility on site sufficient to accommodate the large trolley vehicles. It would need to have large garage bays that could allow mechanics to access the underside of the trolleys to perform work tasks, either by raising the trolleys off of the ground or by providing an underground space. The temporary site would also need to have sufficient parking for trolley drivers and maintenance staff, and adequate space to store the trolleys.
2. **Location:** The location of the facility had to be close to the start of the trolley's existing route. The purpose of this was to minimize travel time and operating costs (fuel, driver time), which would be higher if traveling from a site far away from the City's trolley route.
3. **Availability:** The City determined that the facility had to be immediately available for trolley maintenance and storage because the City would need to vacate the South Le Jeune Road Facility as early as April 15, 2015. The facility would also need to be continually available until construction of the permanent facility could be completed.

The City evaluated the three properties shown in **Table 1** for suitability as the temporary facility site. After an in-person visit to 6980 SW 58th Place in South Miami (Temporary Site Option 3), the City discontinued consideration of the site. Temporary Site Option 3 is a privately owned site that currently operates as a body shop. This site did not have sufficient parking for trolley staff (maintenance workers and drivers) or sufficient storage space for trolleys, which would require City to store numerous trolleys at another location. As to the maintenance area, there was no underground workspace for the City's mechanics to get underneath the trolleys and the ceilings were too low for the trolleys to be raised up for maintenance work. Accordingly, the City determined that this site was not feasible as a temporary location.

Only two temporary sites met the City's use, location, and availability criteria for relocation and temporary use. Temporary Site Option 1 is the Limousines of South Florida (LSF) Shuttle site located at

2766 NW 62nd Street, Miami, Florida 33122 (LSF Shuttle Site). Temporary Site Option 2 is the Miami-Dade County Central East Transportation Center, located at 7001 SW 4th Street, Miami, Florida 33144 (School Board Site).

Table 1: Properties Considered for the Proposed Temporary Facility

Temporary Site Option	Folio Number	Physical Address	Property Size (sq. ft.)	Distance from Trolley Route (mi.)	Reason for Elimination
1	30-3116-009-7520	2766 NW 62 nd Street, Miami, FL 33147	93,782	5.0	None
2	01-4002-012-0010	7001 SW 4 th Street Miami, FL 33144	517,057	3.4	None
3	09-4025-028-2060	6980 SW 58 th Place, South Miami, Florida 33143	49,500	2.5	Insufficient Parking & Maintenance Area

SOURCE: Miami-Dade County Property Appraiser, 2015

Identification of Potential Impacts

The temporary site selected would be used by the approximately 6 to 7 trolley drivers who would be on site between shifts (the City's trolley dispatcher and supervisor would remain within the City). The temporary facility would replace the one currently operating at 4133 South Le Jeune Road. This existing facility is not climate controlled, and so the garage bays at the existing site remain open while trolley maintenance work is performed on the vehicles. The temporary use of either site would replace the use of this existing facility and eliminate any impacts to the surrounding residents. The Coral Gables Trolley operates Monday through Friday between 6:30 a.m. and 8:00 p.m., except the first Friday of each month when it runs until 10:00 p.m. on 10 to 15 minute headways. The trolleys do not operate on municipal holidays.

Temporary Site Option 1: LSF Shuttle Site

Temporary Site Option 1 is located near the intersection of NW 62nd Street and NW 27th Avenue, approximately five (5) miles north and east of the trolley's route within unincorporated Miami-Dade County. The site is 93,782 square feet and owned and operated by LSF Shuttle for its trolley and transit business operations. LSF's draft proposal is to lease space to the City for storage and to provide light maintenance services (i.e., in order to ensure start-up of the trolleys each day) on the site. The maintenance would be performed by the LSF employees, rather than the City's mechanics, as there is no separate space for the City's mechanics to work on the trolleys. Any major mechanical work would be conducted at the City's 72nd Street Fleet Services Center. The cost of this arrangement would be approximately \$243,815 for one year. If the City elects to use LSF Shuttle for storage and full maintenance (as opposed to light maintenance only), the cost of that arrangement would be \$367,511.

The cost of the lease selected by the City would be added to its existing operating costs for the trolleys.

If Temporary Site Option 1 is selected as the temporary facility location, trolley drivers would report to work at the LSF Shuttle Site and depart by travelling south on NW 27th Avenue, and west on Flagler Street before picking up the trolley route on Ponce de Leon Boulevard. Drivers would return to the LSF Shuttle Site by the same route at the end of their shifts. The trolleys would continue to refuel at the current location they use on their route (525 South Dixie Highway in Coral Gables).

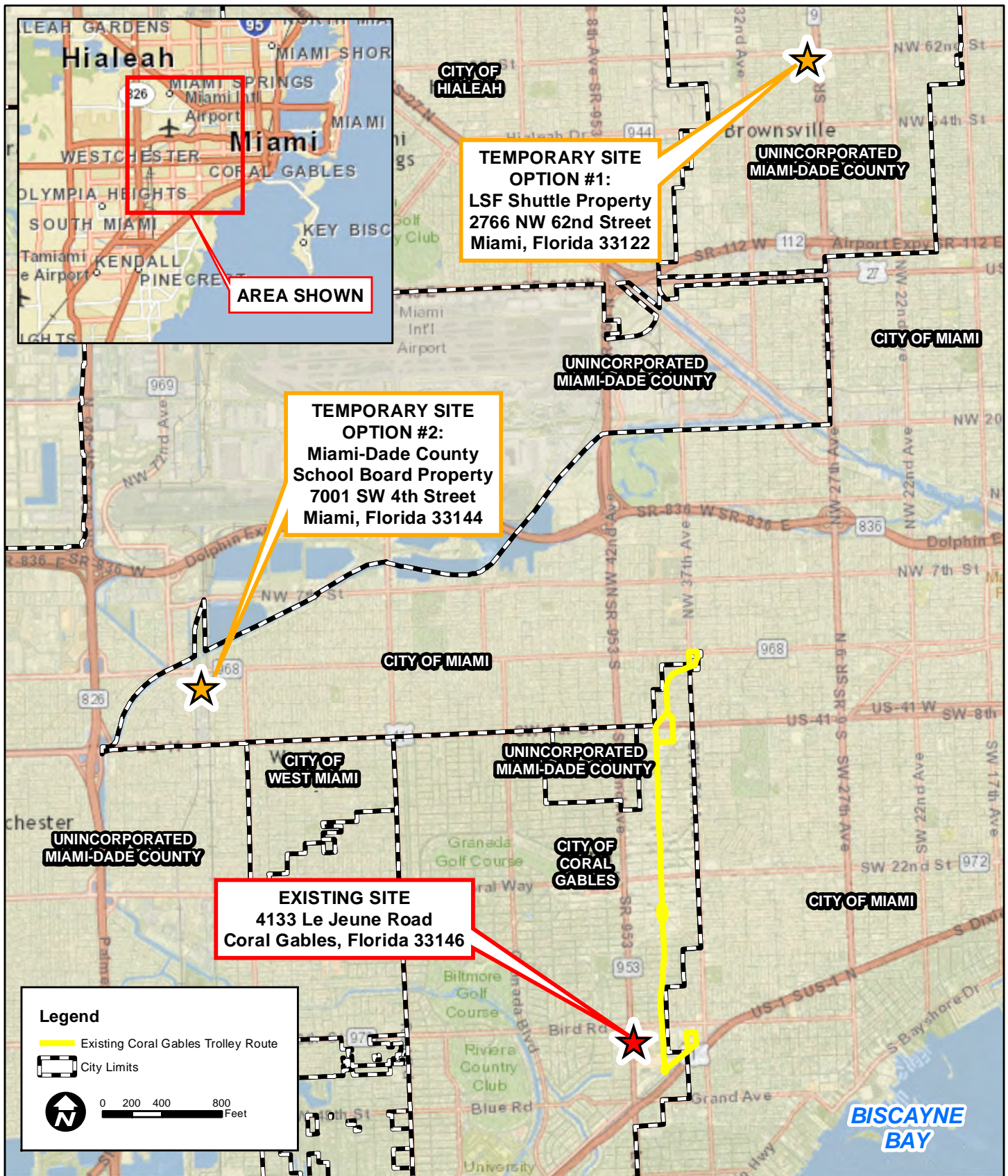
Temporary Site Option 2: School Board Site

Temporary Site Option 2 is located between two railroad lines near the intersection of SW 4th Street and W 69th Avenue, approximately 3.4 miles west of the trolley's route within the City of Miami city limits. The site is owned and operated by the Miami-Dade County Public Schools as the Central East Transportation Center for the maintenance and storage for over 100 school buses. The site has one vacant building, which contains a maintenance and storage bay, and covered outside storage for vehicles. At this site, the City's mechanics will be able to perform the same type of maintenance activities performed at the City's current trolley facility and there is space to store eight to nine trolleys (the remaining would be stored on other City property). There are also 20 parking spaces available for the City's mechanics and the trolley drivers. Miami-Dade Public Schools has agreed to make the building and associated outdoor space available for lease on a short-term basis to the City. The proposed lease would be for one year, with the option to renew for an additional one (1) year. The cost of the lease would be approximately \$200,000 (to be paid by the City to replace seats in the Coral Gables High School Auditorium), and the City would be responsible for its portion of the utilities, security and tax payments for the lease building on the site. The site is framed by railroad tracks on the east and west sides, with residential areas adjacent to the tracks.

If Temporary Site Option 2 is selected as the temporary facility location, drivers would be transported to the site by van from the LSF Shuttle Site, and the trolleys would depart the School Board Site by 6:30 a.m., fifteen minutes ahead of the school buses. The trolleys would exit the School Board Site onto eastbound SW 4th Street and proceed to their route by turning south on SW 67th Avenue and east on SW 8th Street to Ponce de Leon Boulevard. Drivers would return to the School Board Site by the same route at the end of their shifts. The trolleys would continue to refuel at the current location they use on their route (525 South Dixie Highway in Coral Gables). All trolley maintenance would be conducted at the School Board Site.

Figure 1 shows the temporary site locations in relation to the trolley route. The primary impacts that were identified in conjunction with the use of the temporary facility include:

- Noise impacts from the trolley vehicles going to and from the facility, from maintenance work being performed on the trolley vehicles, and potentially from employees gathering outside the facility;
- Air quality impacts from trolley and employees' private vehicles going to and from the facility;
- Traffic impacts from increased trips near each site due to both trolley movements and employee trips to and from work. The analysis also considered impacts to traffic along the potential paths trolleys would use to access the trolley route from the site.



CITY OF CORAL GABLES
 BUS MAINTENANCE DEPOT CENTER
 TITLE VI EQUITY ANALYSIS
 Coral Gables, Florida

FIGURE 1:
 TROLLEY MAINTENANCE AND STORAGE FACILITY
 TEMPORARY SITE OPTIONS LOCATION MAP

Identification of the Analysis Area

The disparate impact analysis involves comparing the racial makeup of some defined “analysis area” around the proposed site to a defined comparison population. Per FTA C 4702.1B, “for a statistical measure of disparate impact” the comparison population is defined as “all persons who are either affected by....changes or who could possibly be affected by the...change.” For the purposes of this study, the comparison population was defined as all residents within the city limits of the City of Coral Gables.

The goal for the analysis areas was to define an area around the proposed temporary site that would encompass the anticipated impacts if the trolley operations were temporarily being conducted there. The analysis area for the proposed site was defined as a half mile buffer in accordance with FTA Guidance. The racial makeup for the analysis areas of the proposed site was compared against that of a comparison population to determine if a disparate impact exists. The comparison population was determined by the location of the temporary site. The LSF Shuttle Site is located within unincorporated Miami-Dade County, and so Miami-Dade County’s population was used as the comparison population. The School Board Site is located within the City of Miami, and so the City of Miami’s population was used as the comparison population.

Figure 2 illustrates the defined analysis area around the LSF Shuttle Site, an area encompassing approximately 582 acres. As shown in the existing land use map (**Figure 3**), nearly half of this acreage consists of residential land (46%) or transportation/utilities (30%). The analysis area is generally divided by NW 27th Avenue and NW 62nd Street. NW 27th Avenue is a major north-south corridor lined with commercial and institutional land uses on both sides, and NW 62nd Street, a major east-west corridor lined with the same land uses. The residential areas in all quadrants are located generally behind the commercial and institutional uses and not along the two major corridors. The LSF Shuttle Site is zoned commercial-liberal, and in the immediate vicinity of the site, land uses generally include other vehicle maintenance and storage uses, including a storage lot, a gas station, and some vacant land. The Miami-Dade County School Board’s Northeast Transportation Center, which includes a maintenance and storage facility serving over 200 school buses, is located opposite the LSF Facility on NW 27th Avenue. Originally constructed in 1955, the LSF Facility has been under its current ownership since 1993 according to Miami-Dade County Property Appraiser records, and a review of historic aerial photography shows the facility being used to store vehicles at least since 1999.

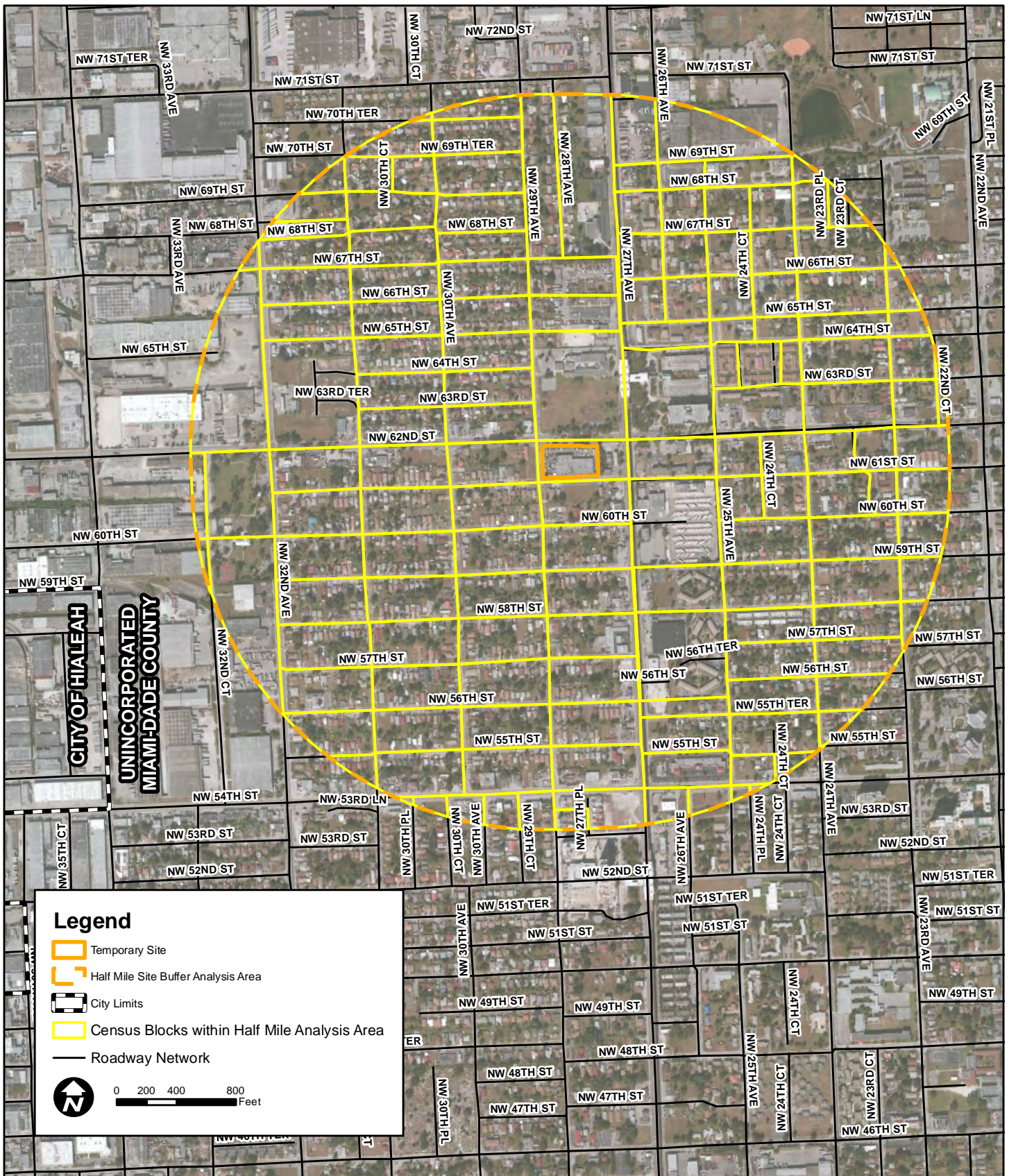
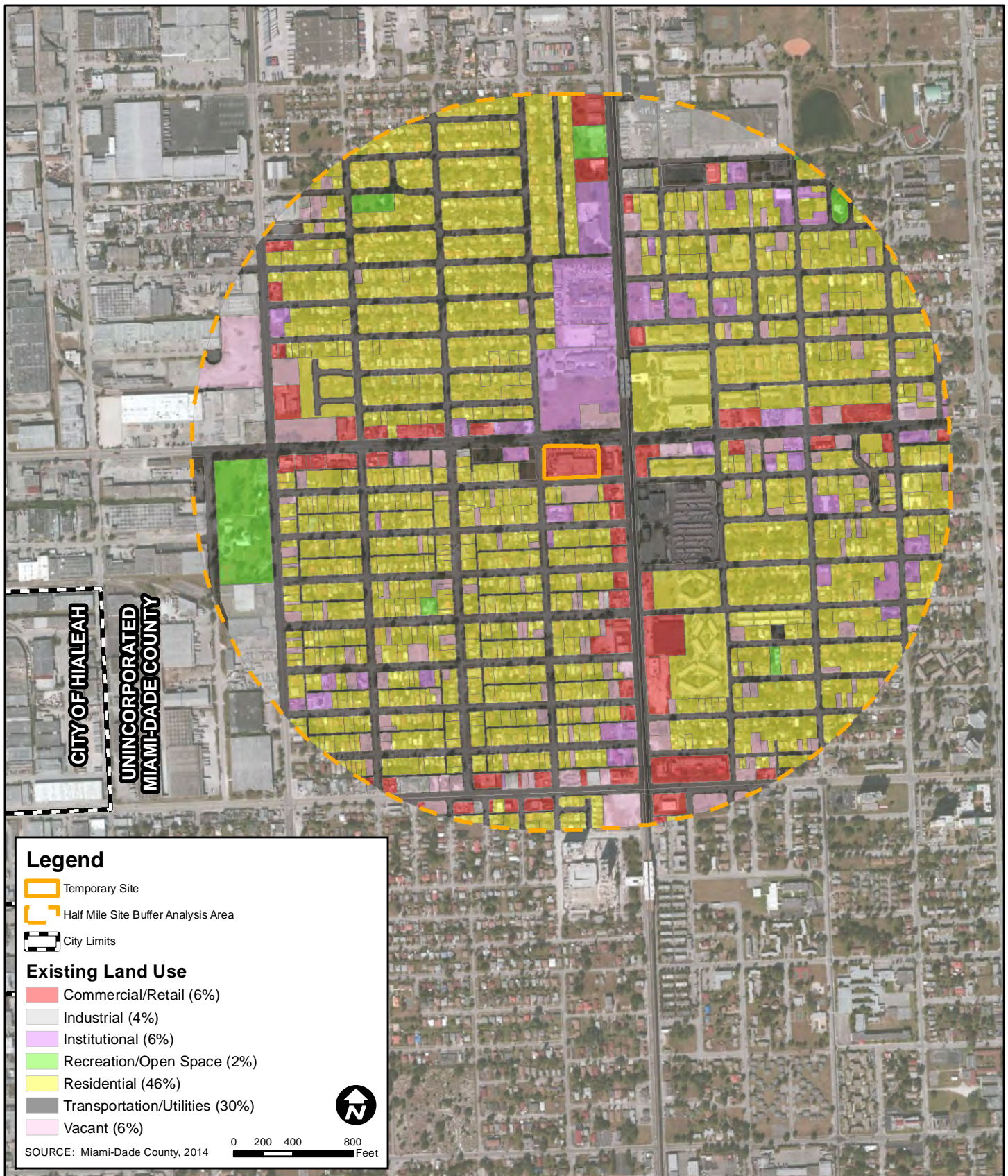


FIGURE 2:
LSF SHUTTLE SITE
ANALYSIS AREA MAP



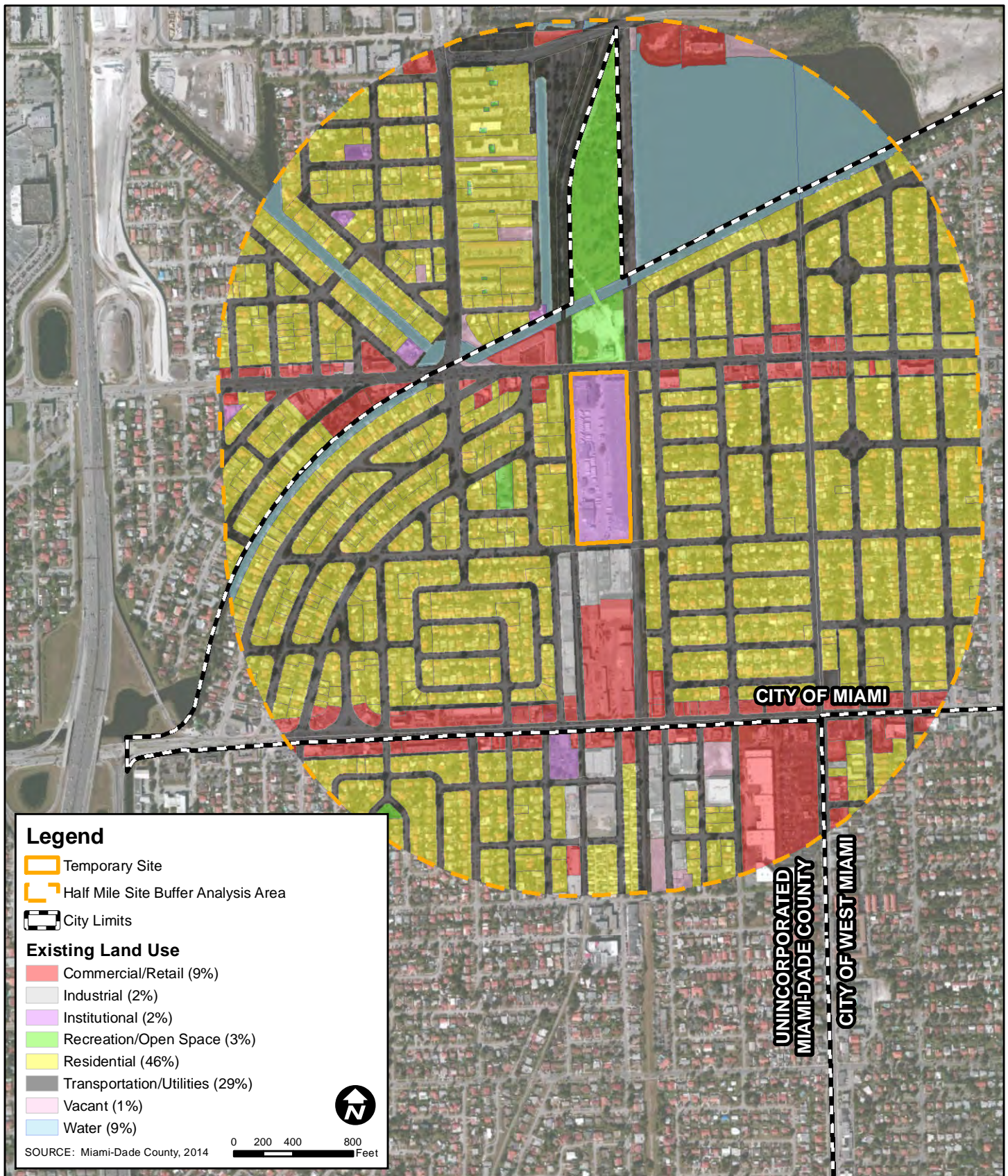
CITY OF CORAL GABLES
BUS MAINTENANCE DEPOT CENTER
TITLE VI EQUITY ANALYSIS
Coral Gables, Florida

FIGURE 3:
LSF SHUTTLE SITE - EXISTING LAND USE MAP

Figure 4 illustrates the defined analysis area around the School Board Site, an area encompassing approximately 718 acres. As shown in the existing land use map (**Figure 5**), nearly half of this acreage consists of residential land (46%) or transportation/utilities (29%). The School Board Site is zoned for industrial use, and bordered on the east and west sides by railroad tracks, Flagler Street on the north, and an industrial area on the south. Single family residential homes are separated from the School Board site by railroad tracks. A review of Miami-Dade County Property Appraiser records and historic aerials show no significant change in land use over the past decade.



FIGURE 4:
SCHOOL BOARD SITE
ANALYSIS AREA MAP



CITY OF CORAL GABLES
BUS MAINTENANCE DEPOT CENTER
TITLE VI EQUITY ANALYSIS
Coral Gables, Florida

FIGURE 5:
SCHOOL BOARD SITE - EXISTING LAND USE MAP

Equity Analysis

U.S. Census 2010 data was used to determine the racial make-up of the analysis areas for each of the temporary site options as well as that for the comparison population. All Census Blocks within the defined analysis area for the proposed site were included in the calculations. **Table 2** shows the total population, minority population and minority percentage within each analysis area for the temporary site options, as well as the figures for the comparison population.

For the purposes of this evaluation, “minority persons” include the following:

- (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

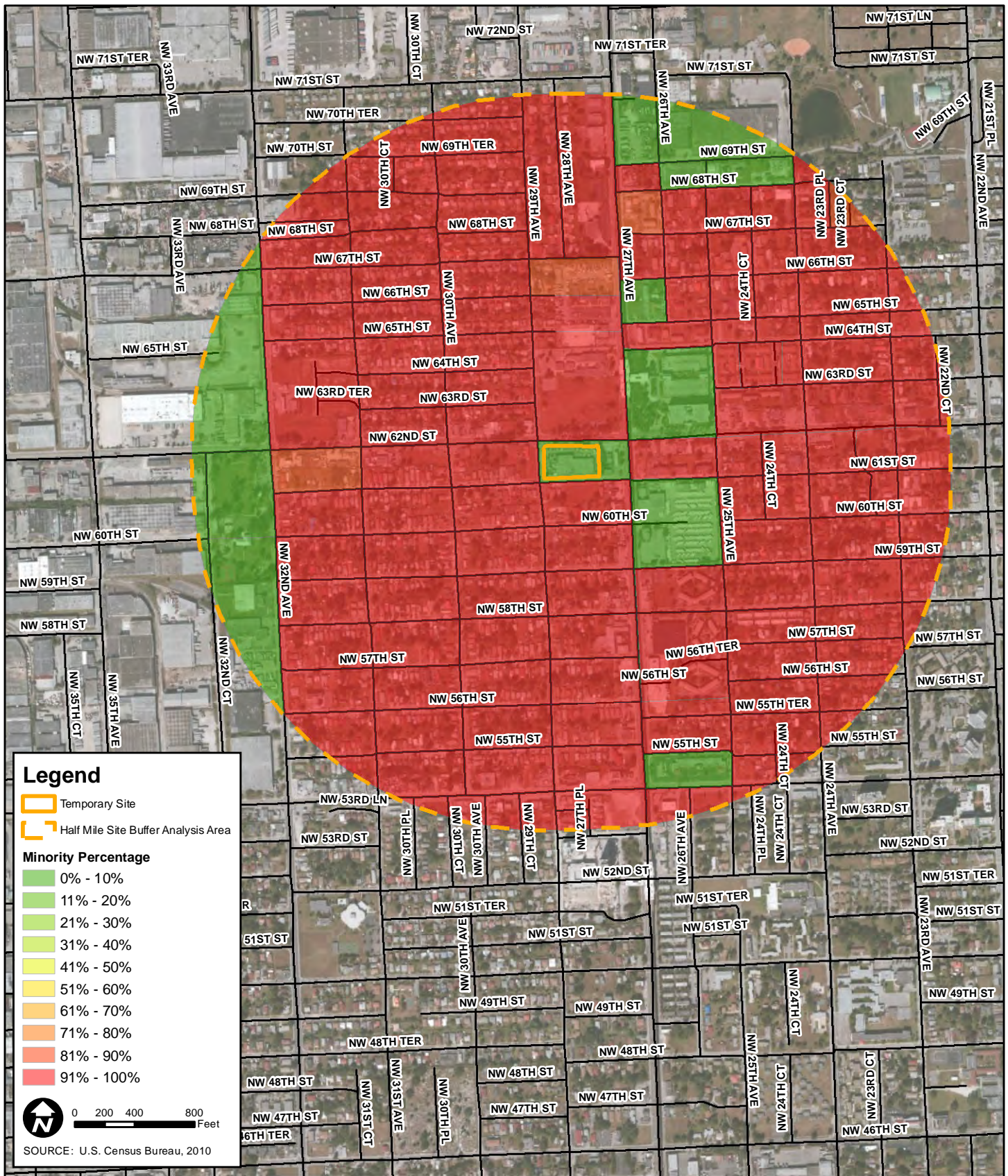
Table 2: Minority Composition – Temporary Site Options and Comparison Populations

Location	Totals within Analysis Areas				
	Total Population	Minority Population	Percent Minority	Percent Hispanic	Percent Black
Comparison Population (Miami-Dade County)	2,496,435	2,112,884	88%	65%	19%
2766 NW 62 nd Street (LSF Shuttle Site)	5,969	5,886	99%	24%	76%
Comparison Population (City of Miami)	399,457	351,922	88%	70%	19%
7001 SW 4 th Street (School Board Site)	11,120	10,506	94%	90%	6%

SOURCE: U.S. Census Bureau, 2010

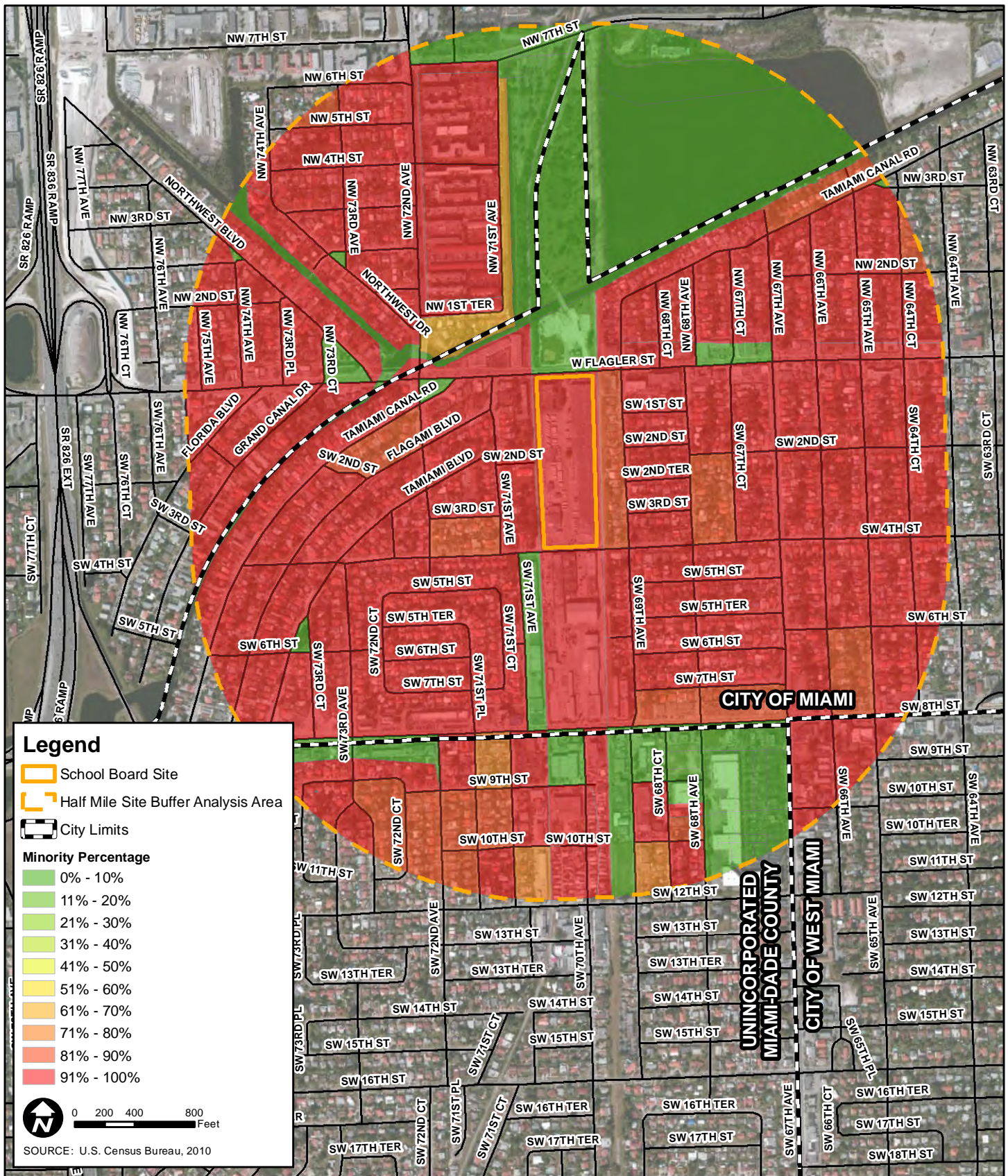
The LSF Shuttle Site’s minority percentage within the analysis area is more than ten (10) percentage points higher than the Miami-Dade County comparison population, indicating that the overall minority composition of the analysis area is higher than that of the County as a whole. The LSF Shuttle Site’s analysis area’s Hispanic percentage is more than 40 percentage points lower than the County’s, while the percentage of the Black population within the analysis area is over 50 percentage points higher. **Figure 6** shows the LSF Shuttle Site analysis area by minority composition.

The School Board Site's minority percentage within the analysis area is six (6) percentage points higher than the City of Miami comparison population, indicating an overall higher minority composition within the analysis area as compared to that of the City of Miami in which the site is located. The School Board Site analysis area's Hispanic percentage is approximately 20 percentage points higher than the City's, while the percentage of the Black population is approximately 13 percentage points lower. **Figure 7** shows the School Board Site analysis area by minority composition.



CITY OF CORAL GABLES
BUS MAINTENANCE DEPOT CENTER
TITLE VI EQUITY ANALYSIS
Coral Gables, Florida

FIGURE 6:
LSF SHUTTLE SITE ANALYSIS AREA
BY MINORITY PERCENTAGE MAP



CITY OF CORAL GABLES
BUS MAINTENANCE DEPOT CENTER
TITLE VI EQUITY ANALYSIS
Coral Gables, Florida

FIGURE 7:
SCHOOL BOARD SITE ANALYSIS AREA
BY MINORITY PERCENTAGE MAP

Impact Analysis

Both the LSF and School Board Sites currently function and have historically functioned as maintenance and storage facilities for transit vehicles. These sites, and similar uses located within each site's analysis area already generate noise, emissions that affect air quality, and traffic within the analysis area. Due to the existing conditions on these sites, any impacts within the analysis area would be those resulting from the *additional* noise, air quality, and traffic impacts associated with up to eleven (11) new trolleys and seven (7) additional drivers using the site over the one-to-two year time period. Assuming each employee drives to work each day and leaves the site at the end of the day, the addition of 7 employees to the site would generate an additional 14 trips to the site each day, and 42 trips if each drives to make a lunch trip as well. These trips would be dispersed throughout the day based on each employee's shift. Based on the hours of operation of the trolley, 6:30 a.m. to 8:00 p.m. or 10:00 p.m. on weekends, many of these trips would be occurring outside of peak morning and afternoon travel times.

LSF Shuttle Site

The City's temporary use of the LSF Shuttle Site is expected to create minimal impacts to the residents within the analysis area. Residents within the analysis area already experience increased noise, emissions, and traffic associated with the operation of the existing LSF Facility. They also experience increased noise emissions, and traffic associated with the hundreds of school busses that use the County's Northeast Transportation Center on NW 27th Avenue, and increased noise associated with the Metrorail line located above NW 27th Avenue. Currently, the trolley drivers already report to work at the LSF Shuttle Site, and are transported by shuttle to the location of their trolley before they start their route. Maintaining and storing the trolleys at the LSF Shuttle Site would eliminate the need to shuttle the drivers to their trolleys off site. Although the trolleys would be travelling along NW 27th Avenue and Flagler Street to reach their route on Ponce de Leon Boulevard, they would be leaving the site and returning outside of peak travel times. Traffic, air quality, and noise impacts are expected to be negligible at LSF Shuttle Site with the addition of the trolleys to the site's existing operations.

School Board Site

The City's temporary use of the School Board Site is expected to create minimal impacts to residents within the analysis area. Residents within the analysis area already experience increased noise, emissions, and traffic associated with the operation of the Central East Transportation Center and the hundreds of school bus trips access this site each weekday, the adjacent industrial land uses, and noise associated with the active railroad tracks adjacent to the site. Trolleys would be leaving the site in the morning in advance of school bus departure time (6:45 a.m.) and return after the school buses in the afternoon (5:00 p.m.). Driver trips to the School Board Site would be minimized as drivers report to the LSF Shuttle Site and would arrive by shuttle to the School Board Site to pick up their trolleys, and be picked up and returned to the LSF Shuttle Site by shuttle at the end of their shift. City mechanics might perform maintenance work on the trolleys at times when the School Board operations facility is otherwise closed.

Results and Conclusions

The minority compositions within the LSF Shuttle Site and School Board Site are both higher than their respective comparison populations by 6-10 percentage points, although the dominant minority group differs by analysis area. Within the LSF Shuttle Site's analysis area, the population is 76% Black and 24% Hispanic, and within the School Board Site's analysis area, the population is 6% Black and 90% Hispanic. For the Miami-Dade County and the City of Miami comparison populations, the population is 19% Black and 65%/70% Hispanic, respectively.

Both temporary sites are already located adjacent to existing land uses that have historically been associated with producing noise, vehicle emissions that effect air quality, and traffic on the local roadways. Both the LSF and School Board Sites are currently used for the maintenance and storage of transit vehicles, and have similar compatible uses located nearby. The LSF Shuttle Site is adjacent to an overhead Metrorail line and a large school bus maintenance and storage center with over 200 vehicles. The School Board Site stores and maintains over a hundred vehicles and is located between two active railroad tracks and adjacent to industrial land uses. Populations located within the analysis areas already experience the associated noise, air quality, and traffic impacts associated with the existing land use conditions, and so any additional impacts associated with the temporary use of the LSF Shuttle Site or School Board Site as a Trolley maintenance and storage facility for eleven (11) additional vehicles are expected to be negligible. Although both the LSF Shuttle Site and School Board Site analysis areas have a higher minority percentage than their respective comparison populations, neither is expected to be impacted by the City's temporary use of the existing facilities on either site.