

City of Lauderhill  
5581 W. Oakland Park Blvd.  
Lauderhill, FL 33313



# Finding of Necessity

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Lauderhill Southeastern CRA

Produced by:  
EDSA &  
Carras Community Investment, Inc.

September 28, 2018

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# EXECUTIVE SUMMARY

In accordance with Chapter 163, Part III, Florida Statutes, EDSA and Carras Community Investment, Inc. (CCI) conducted this Finding of Necessity to assess conditions of slum and blight in the following study area. The Finding of Necessity provides a detailed review of existing land use characteristics, socioeconomic conditions, and physical features, and finds the existence of slum and blight conditions in the study area as defined in Section 163.355, F.S. With this finding, the study area meets the requirements for the creation of a Community Redevelopment Agency and ultimately a Community Redevelopment Area.

A Community Redevelopment Agency will have the ability to focus redevelopment resources into the proposed Community Redevelopment Area, which will help reduce and eliminate slum and blight and improve the livability of the study area. Improving living conditions will reverse trends of economic, socioeconomic, and physical decline, and provide the critical incentives for redevelopment and growth to maintain a vibrant and thriving community.

# INTRODUCTION

On March 26, 2018, the Lauderhill City Council approved Resolution 18R-03-47, initiating this Finding of Necessity to determine if a Community Redevelopment Area is needed. To create a Community Redevelopment Area, a city first must conduct a “Finding of Necessity” to determine if an area contains slum and/or blight. If a Finding of Necessity determines that such conditions exist, a city then has the authority to create a Community Redevelopment Agency, which is tasked with developing a Community Redevelopment Plan. A Community Redevelopment Plan delineates the boundaries of a Community Redevelopment Area and outlines the methods to reduce slum and blight in the proposed area.

## Community Redevelopment Act

This document has been produced in accordance with Finding of Necessity requirements, as stipulated by the Community Redevelopment Act of 1969, Chapter 163 Part III, Florida Statutes (the “Act”). The Act authorizes local governments to establish Community Redevelopment Agencies to improve slum and blighted areas within their jurisdiction. The Act also sets forth the legal process by which local governments may establish Community Redevelopment Agencies and implement financing and regulatory processes aimed at addressing the underlying causes of slum and blight in declining areas. The following statutes have been provided for reference.

## Relevant Florida Statutes

### 163.355 Finding of necessity by county or municipality.

*No county or municipality shall exercise the community redevelopment authority conferred by this part until after the governing body has adopted a resolution, supported by data and analysis, which makes a legislative finding that the conditions in the area meet the criteria described in s. 163.340(7) or (8). The resolution must state that:*

- (1) One or more slum or blighted areas, or one or more areas in which there is a shortage of housing affordable to residents of low or moderate income, including the elderly, exist in such county or municipality; and*
  
- (2) The rehabilitation, conservation, or redevelopment, or a combination thereof, of such area or areas, including, if appropriate, the development of housing which residents of low or moderate income, including the elderly, can afford, is necessary in the interest of the public health, safety, morals, or welfare of the residents of such county or municipality.*

### 163.356 Creation of community redevelopment agency

*(1) Upon a finding of necessity as set forth in s. 163.355, and upon a further finding that there is a need for a community redevelopment agency to function in the county or municipality to carry out the community redevelopment purposes of this part, any county or municipality may create a public body corporate and politic to be known as a “community redevelopment agency.”*

### **163.340 Definitions (Slum)**

(7) "Slum area" means an area having physical or economic conditions conducive to disease, infant mortality, juvenile delinquency, poverty, or crime because there is a predominance of buildings or improvements, whether residential or nonresidential, which are impaired by reason of dilapidation, deterioration, age, or obsolescence, and exhibiting one or more of the following factors:

- (a) Inadequate provision for ventilation, light, air, sanitation, or open spaces;
- (b) High density of population, compared to the population density of adjacent areas within the county or municipality; and overcrowding, as indicated by government-maintained statistics or other studies and the requirements of the Florida Building Code; or
- (c) The existence of conditions that endanger life or property by fire or other causes.

### **163.340 Definitions (Blight)**

(8) "Blighted area" means an area in which there are a substantial number of deteriorated or deteriorating structures; in which conditions, as indicated by government-maintained statistics or other studies, endanger life or property or are leading to economic distress; and in which two or more of the following factors are present:

- a) Predominance of defective or inadequate street layout, parking facilities, roadways, bridges, or public transportation facilities.
- b) Aggregate assessed values of real property in the area for ad valorem tax purposes have failed to show any appreciable increase over the 5 years prior to the finding of such conditions.
- c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness.
- d) Unsanitary or unsafe conditions.
- e) Deterioration of site or other improvements.
- f) Inadequate and outdated building density patterns.
- g) Falling lease rates per square foot of office, commercial, or industrial space compared to the remainder of the county or municipality.
- h) Tax or special assessment delinquency exceeding the fair value of the land.
- i) Residential and commercial vacancy rates higher in the area than in the remainder of the county or municipality.
- j) Incidence of crime in the area higher than in the remainder of the county or municipality.
- k) Fire and emergency medical service calls to the area proportionately higher than in the remainder of the county or municipality.

- l) *A greater number of violations of the Florida Building Code in the area than the number of violations recorded in the remainder of the county or municipality.*
- m) *Diversity of ownership or defective or unusual conditions of title which prevent the free alienability of land within the deteriorated or hazardous area.*
- n) *Governmentally owned property with adverse environmental conditions caused by a public or private entity.*
- o) *A substantial number or percentage of properties damaged by sinkhole activity which have not been adequately repaired or stabilized.*

**163.340 Definitions (Community Redevelopment)**

*(9) "Community redevelopment" or "redevelopment" means undertakings, activities, or projects of a county, municipality, or community redevelopment agency in a community redevelopment area for the elimination and prevention of the development or spread of slums and blight, or for the reduction or prevention of crime, or for the provision of affordable housing, whether for rent or for sale, to residents of low or moderate income, including the elderly, and may include slum clearance and redevelopment in a community redevelopment area or rehabilitation and revitalization of coastal resort and tourist areas that are deteriorating and economically distressed, or rehabilitation or conservation in a community redevelopment area, or any combination or part thereof, in accordance with a community redevelopment plan and may include the preparation of such a plan.*

**163.340 Definitions (Community Redevelopment Area)**

*(10) "Community redevelopment area" means a slum area, a blighted area, or an area in which there is a shortage of housing that is affordable to residents of low or moderate income, including the elderly, or a coastal and tourist area that is deteriorating and economically distressed due to outdated building density patterns, inadequate transportation and parking facilities, faulty lot layout or inadequate street layout, or a combination thereof which the governing body designates as appropriate for community redevelopment. For community redevelopment agencies created after July 1, 2006, a community redevelopment area may not consist of more than 80 percent of a municipality.*

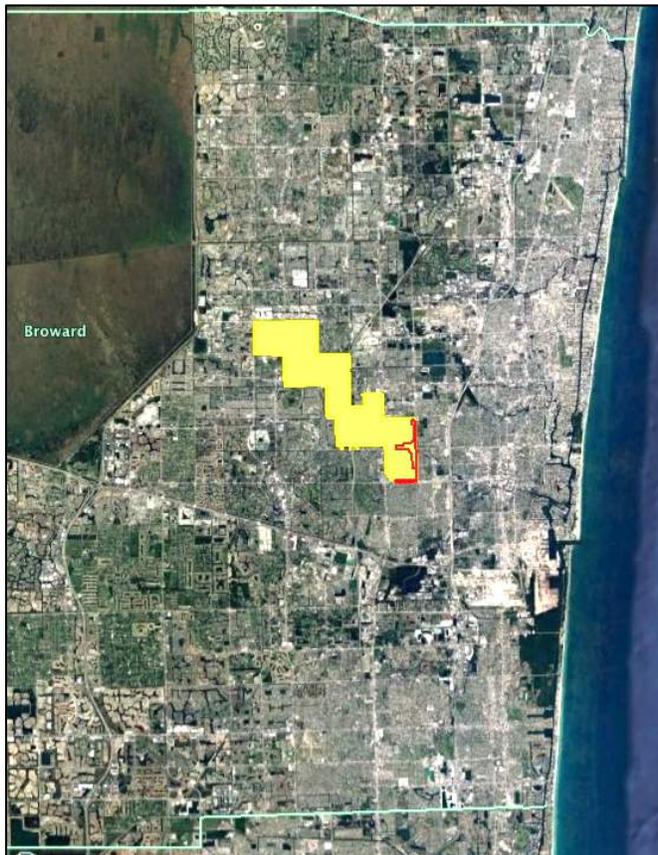
**163.340 Definitions (Community Redevelopment Plan)**

*(11) "Community redevelopment plan" means a plan, as it exists from time to time, for a community redevelopment area.*

## STUDY AREA

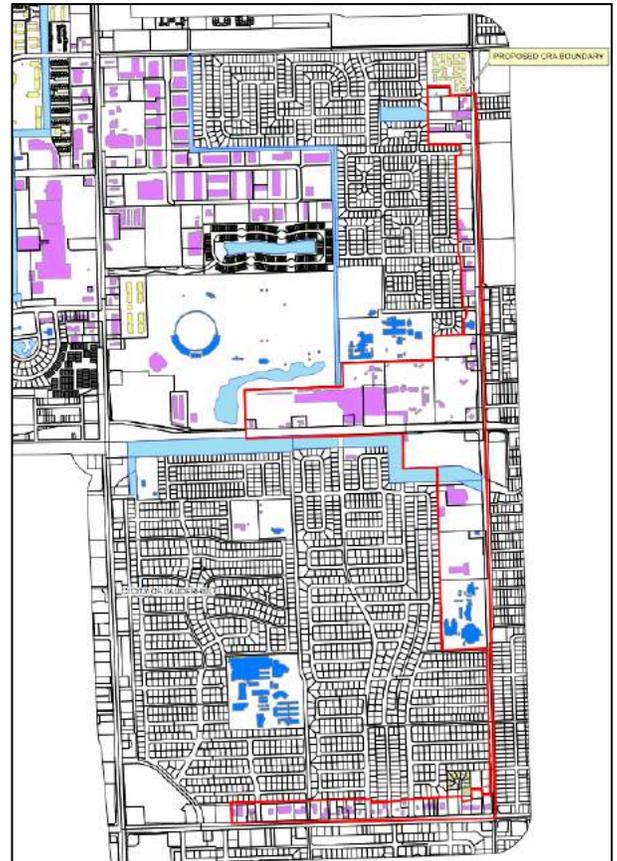
The study area is within the municipal boundaries of the City of Lauderhill, which is centrally located in Broward County, Florida. The majority of the study area is adjacent to Northwest 31<sup>st</sup> Avenue, Sunrise Boulevard, and Broward Boulevard, and is just west of I-95 and east of the Florida Turnpike.

Figure 1. City of Lauderhill and Study Area



Source: Google Earth

Figure 2. Study Area Boundary

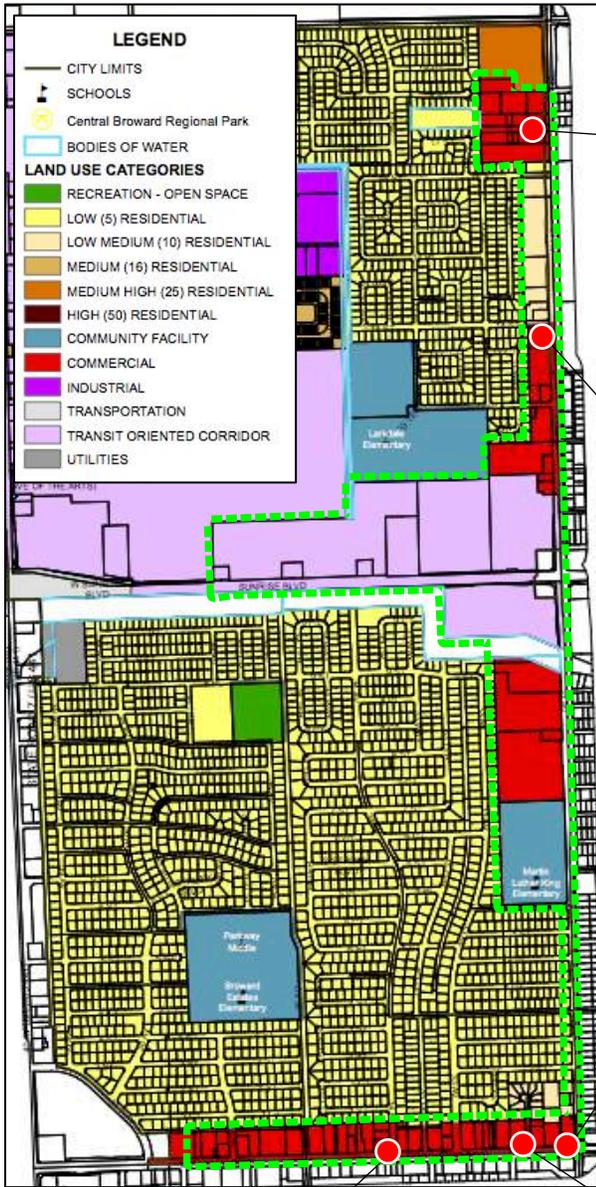


Source: Lauderhill GIS

### Land Uses

The study area consists of outdated industrial and commercial land uses. In particular, Northwest 31<sup>st</sup> Avenue contains numerous junkyards, automotive repair facilities, and the Wingate landfill and incinerator, which is no longer in operation and has been designated by the Environmental Protection Agency as a Superfund site.<sup>1</sup> The study area has a large Transit Oriented Development (TOD) Corridor comprised of the Swap Shop, however, significant redevelopment hurdles remain to transition this land to an active TOD.

Figure 3. Land Use Map



Source: City of Lauderdale

Abandoned Building – 3351 West Broward Blvd



International Global Metals – 1701 Martin Luther King Jr Ave



Mr Bs Auto Sales LLC – 1391 NW 31 Ave



Flamingo Liquors No 4 – 3101 W Broward Blvd



Empty Lot – 3201 West Broward Blvd



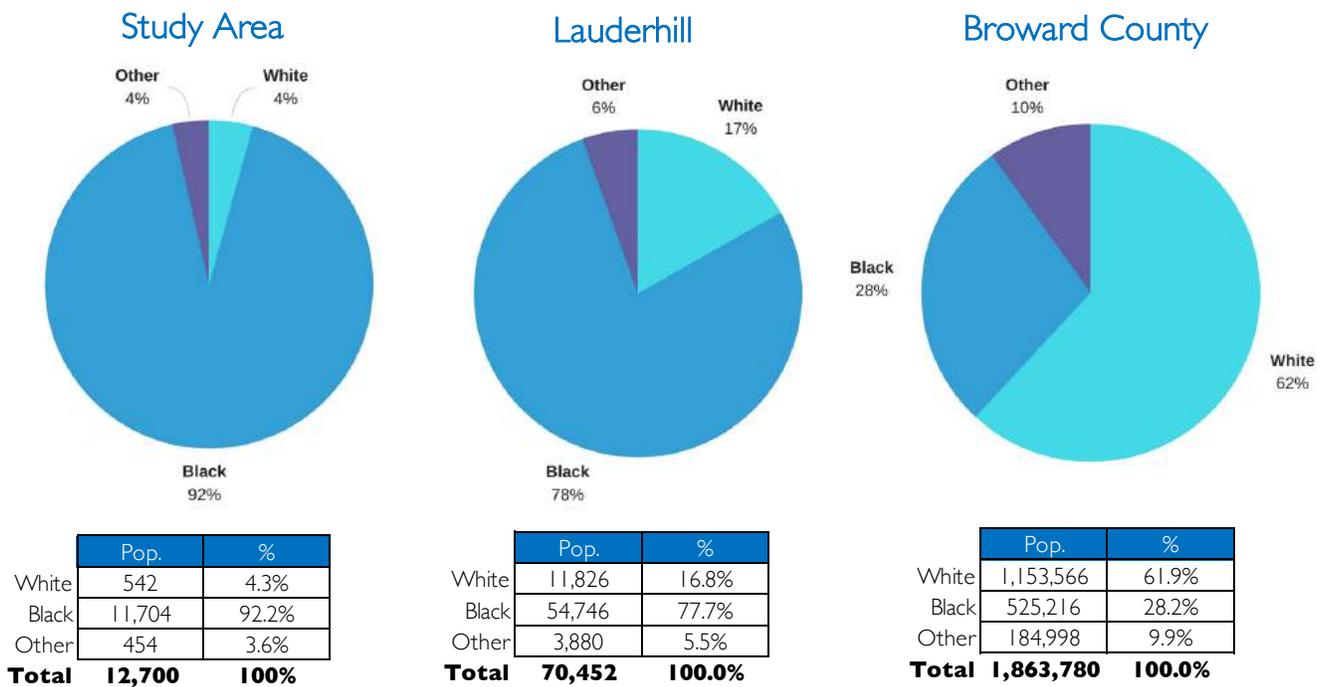
## Socioeconomic Data

CCI utilized census data to extract various data sets for the study area, the City of Lauderhill, and Broward County. This allows for a direct comparison of the study area to surrounding areas and provides clarity regarding the study area's needs. CCI extrapolated data from the United States Census American Community Survey 2016 datasets for the two census tracts that cover the study area: 12011041200 and 12011041300. This is the most recent and geographically specific data that can be found for the study area.

### Demographics

The study area has a total population of 12,700 people.<sup>2</sup> Like the City of Lauderhill, the study area has a majority minority population, with African Americans constituting 92% of the population.<sup>3</sup> Compared to the City of Lauderhill (78% African American) and Broward County (28% African American), the study area has one of the larger minority populations in the County (based on a percentage of the total population for the census tracts).<sup>4</sup>

Figure 4. Demographics



Source: U.S. Census Bureau; American Community Survey, 2016

### Economic Data

Compared to the City of Lauderhill and Broward County, the study area has a lower median household income, higher rate of poverty, higher rate of unemployment, and higher number of individuals requiring food assistance. Combined, these factors illustrate a community that is economically depressed.

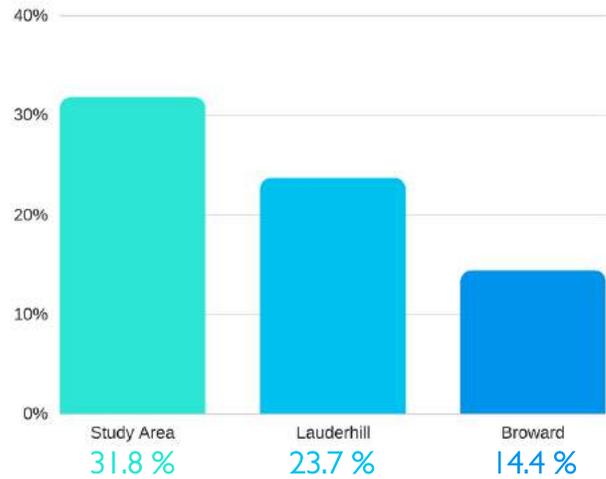
The study area's median household income is \$35,414 (when averaged between the two census tracts), while the median household income in Lauderhill is \$37,597 and \$52,954 in Broward County. The study area's challenging economic circumstances are further highlighted by the relatively high rate of poverty (31.8% below poverty), high unemployment rate (16.9%), and number of individuals on food assistance programs (41.3%). The following charts illustrate the aforementioned comparison and demonstrate these challenging economic conditions.

Figure 5. Median Household Income



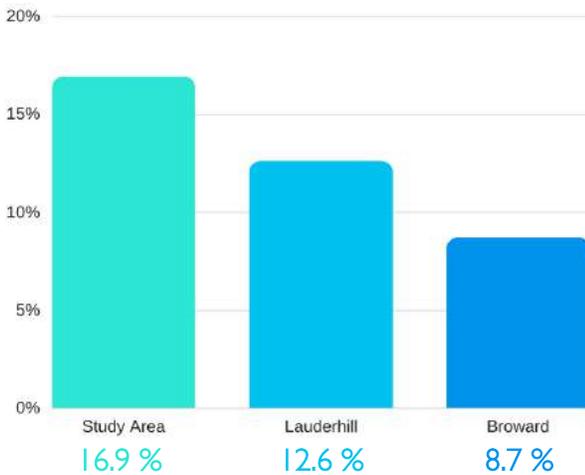
Source: U.S. Census Bureau; American Community Survey, 2016

Figure 6. Percentage of Population Below Poverty Level



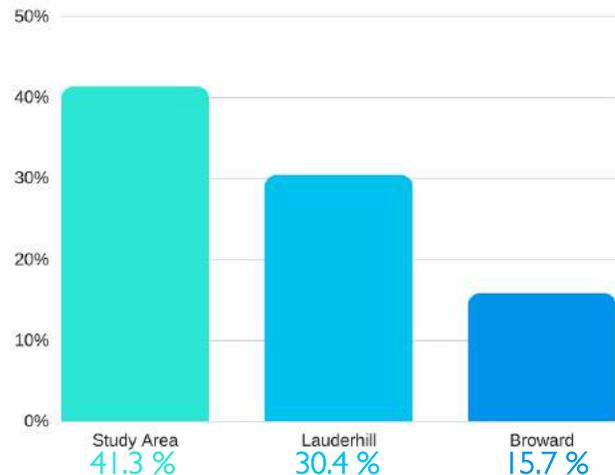
Source: U.S. Census Bureau; American Community Survey, 2016

Figure 7. Unemployment Rate



Source: U.S. Census Bureau; American Community Survey, 2016

Figure 8. Percentage of Households Receiving Food Stamps in the Past 12 Months



Source: U.S. Census Bureau; American Community Survey, 2016

## Challenges Facing the Study Area

The study area faces significant challenges. The surrounding residential neighborhood is economically disadvantaged, which is further exacerbated by failing infrastructure and an absence of diverse and thriving businesses. The study area is in need of substantial redevelopment to provide quality economic opportunities for surrounding households and to improve the general welfare of the community. While not exhaustive, the list below outlines some of these challenges.

### Summary of Challenges

- Badly maintained commercial properties
- Empty and vacant lots with visible garbage and waste
- Lack of access to healthy and nutritious foods
- Poor connectivity between subdistricts of the study area
- Presence of Wingate Incinerator and Dump Superfund Site
- Large area of land (Swap Shop) owned by a single entity
- Lack of quality mass transit options
- Numerous unsanitary and unsafe conditions, including homeless living in abandoned buildings
- Poor general community appearance
- Lack of singular focus and vision for redevelopment
- Lack of dedicated funds for revitalization

# PROJECT METHODOLOGY

CCI reviewed data from the Broward County Property Appraiser, the City of Lauderdale, and the United States Census. Additionally, site surveys were conducted on June 20, 2018, to support the results of the data analysis and confirm the blighted conditions. Observers documented the varying physical conditions in the study area, including: buildings, sidewalks, site layouts, swales, parking lots, and drainage areas. Findings and photographs of the site survey are discussed in each applicable “Blight Findings” section.

Statute	Data Source	Requirement Met
(a) Predominance of defective or inadequate street layout, parking facilities, roadways, bridges, or public transportation facilities.	Field Observations/GIS Analysis	Yes
(b) Aggregate assessed values of real property in the area for ad valorem tax purposes have failed to show any appreciable increase over the 5 years prior to the finding of such conditions.	NA	Inconclusive
(c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness.	NA	Inconclusive
(d) Unsanitary or unsafe conditions.	Field Observations	Yes
(e) Deterioration of site or other improvements.	Field Observations	Yes
(f) Inadequate and outdated building density patterns.	Zoning Code	Inconclusive
(g) Falling lease rates per square foot of office, commercial, or industrial space compared to the remainder of the county or municipality.	CoStar Report	Inconclusive
(h) Tax or special assessment delinquency exceeding the fair value of the land.	NA	Inconclusive
(i) Residential and commercial vacancy rates higher in the area than in the remainder of the county or municipality.	CoStar Report	Yes
(j) Incidence of crime in the area higher than in the remainder of the county or municipality.	GIS Analysis	Inconclusive
(k) Fire and emergency medical service calls to the area proportionately higher than in the remainder of the county or municipality.	GIS Analysis	Inconclusive
(l) A greater number of violations of the Florida Building Code in the area than the number of violations recorded in the remainder of the county or municipality.	Code Violation Report	Inconclusive

(m) Diversity of ownership or defective or unusual conditions of title which prevent the free alienability of land within the deteriorated or hazardous area.	Property Appraiser	Yes
(n) Governmentally owned property with adverse environmental conditions caused by a public or private entity.	Environmental Protection Agency	Yes
(o) A substantial number or percentage of properties damaged by sinkhole activity which have not been adequately repaired or stabilized.	NA	Inconclusive

# ANALYSIS OF BLIGHT FACTORS

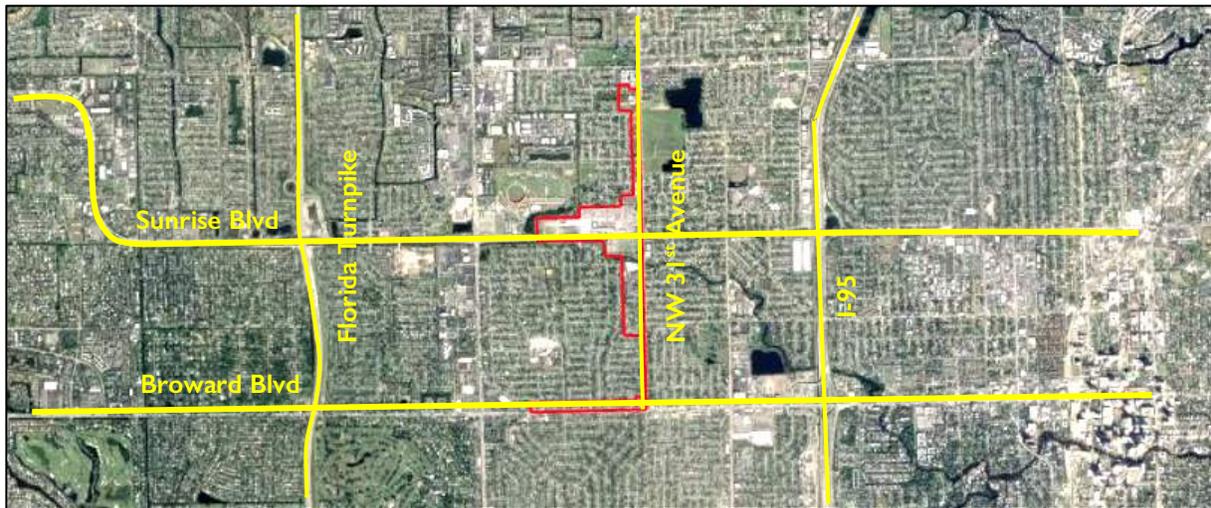
## Inadequate Transportation Facilities

Section 163.340(8)(a) Predominance of defective or inadequate street layout, parking facilities, roadways, bridges, or public transportation facilities.

### Dangerous Roadways

The study area has three major roadways: NW 31<sup>st</sup> Avenue, Sunrise Boulevard, and Broward Boulevard.

Figure 9. Study Area Roadway Network



Source: Google Earth

These are dangerous roadways, as roughly 10% of all vehicular accidents in the City of Lauderhill occur within and around the study area.<sup>5</sup> Sunrise Boulevard, which receives additional traffic from the Swap Shop and is a major connection between the Florida Turnpike, I-95, and downtown Fort Lauderdale, is particularly unsafe, accounting for approximately 60% of the accidents in the study area.<sup>6</sup>

Figure 10. Vehicular Accidents in Study Area, 2017

Study Area:	302	= 10.4%
Lauderhill:	2,913	

Source: Lauderhill Police Department



## Pedestrian Connectivity

Pedestrian facilities are inadequate and unsafe. The sidewalks are narrow and perilously close to speeding vehicles. There are no barriers (natural or artificial) between pedestrians and the street, which creates an uncomfortable and dangerous situation for the non-vehicular traveler.

The dangerous pedestrian conditions are particularly alarming considering that Martin Luther King Elementary School is located on 591 NW 31<sup>st</sup> Avenue. Roughly 480 students attend this school, many of them walking or biking from the surrounding neighborhoods.<sup>7</sup> Children on their way to school are forced to use dangerous sidewalks and cross large intersections prone to vehicular accidents, as described in the previous section.



Figure 11. Martin Luther King Elementary



Source: Google Earth

## Public Transit

The study area is served by the Broward County bus system and Lauderhill Community Bus Shuttle. While there are numerous stops in the study area, bus service is intermittent, and waiting stations are often completely exposed to the elements.



Bus travelers must endure harsh conditions, including high heat, thunderstorms, rain, and hail. The bus stations provide limited shade and protection from the elements, and bus travelers are often forced to wait in lawns, under trees, or at nearby businesses.

## Parking Facilities

Numerous parking facilities are inadequate or in need of repair. In numerous circumstances the asphalt is crumbling, striping is indiscernible, and parking stops/bumpers are not at the end of parking spaces. Few parking lots have landscaping, and many of the auto service facilities have overflow parking on the sidewalk and in the street.



## Unsanitary or Unsafe Conditions

Section 163.340(8)(d) Unsanitary or unsafe conditions.

### Dangerous Uses and Facilities

The study area contains unsightly and unsafe junkyards, scrapyards, and automotive repair facilities. These facilities are clustered along Northwest 31<sup>st</sup> Avenue, which exacerbates an already dangerous use and compounds deleterious environmental conditions.

These facilities often have poor lighting, are bordered by fences and barbed wire, have unsupervised alleys, and appear to contain large quantities of environmentally dangerous materials.



### Water Runoff Facilities

Water runoff facilities contain trash and debris. These facilities are not only unsightly but appear dangerous and unsanitary. Storm water collection facilities are in need of upgrades and routine maintenance. While pollution monitoring and collection are outside the scope of this study, the site survey found several instances of what appeared to be environmental hazards and water facilities in critical condition.



Street drainage systems also appear to be lacking routine maintenance. Gutters have accumulated large amounts of garbage, which slows water dispersion during periods of high precipitation. This garbage also accumulates in front of businesses, along sidewalks, and other locations frequented by customers and residents, which reduces "curb appeal" and can hurt commercial foot traffic.



## Site Deterioration

### Section 163.340(8)(e) Deterioration of site or other improvements.

Observers documented deteriorating conditions in the study area and found deteriorating buildings, lots, parking facilities, fencing, and landscaping.

#### Abandoned Buildings and Lots

Abandoned lots and buildings are unsightly and dangerous and have noticeable site deterioration. Homeless individuals appear to be residing in or around the structures of several buildings, producing unsafe conditions for the individual living at the facility and the surrounding community. Several abandoned lots on Broward Boulevard are littered with waste and lack adequate maintenance.



#### Building and Lot Deterioration

Several buildings and parking lots have fallen into disrepair. Not only do these structures exhibit decay, but many appear unsafe. It is questionable if these structures should even remain in use.



#### Fencing

Poor fencing is another indicator of blight. Many of the structures in the study area are junkyards, scrapyards, and automotive repair facilities, which typically have walls and fencing. Many of these fences are in failing condition. Several abandoned lots also contain fencing that is unsightly and in disrepair.



## Vacancy Rates

Section 163.340(8)(i) Residential and commercial vacancy rates higher in the area than in the remainder of the county or municipality.

### Commercial Vacancy Rate

Vacancy rates can illustrate the desirability of a geographic region, and high vacancy rates are one indication of a struggling real estate market. Lauderdale's commercial vacancy rate is 12.2%, compared to Broward County at 5.6%. Other variables further demonstrate that commercial real estate in Lauderdale is performing poorly. As the tables indicate, Lauderdale's commercial property has low rental rates (\$11.01 sf per sf compared to \$17.46 per sf), high availability (19.1% compared to 8.7%), and spends more time on the market (11.9 months compared to 8.3 months).

Figure 12. Commercial Real Estate Indicators

#### Lauderhill

Availability	Survey	5-Year Avg
Rent Per SF	\$11.01	\$12.54
Vacancy Rate	12.2%	10.7%
Vacant SF	537,268	598,844
Availability Rate	19.1%	13.7%
Available SF	841,093	768,841
Sublet SF	11,772	5,836
Months on Market	11.9	22.9

#### Broward County

Availability	Survey	5-Year Avg
Rent Per SF	\$17.46	\$14.60
Vacancy Rate	5.6%	5.6%
Vacant SF	2,895,862	3,737,242
Availability Rate	8.7%	7.9%
Available SF	4,506,839	5,318,325
Sublet SF	228,804	206,597
Months on Market	8.3	14.4

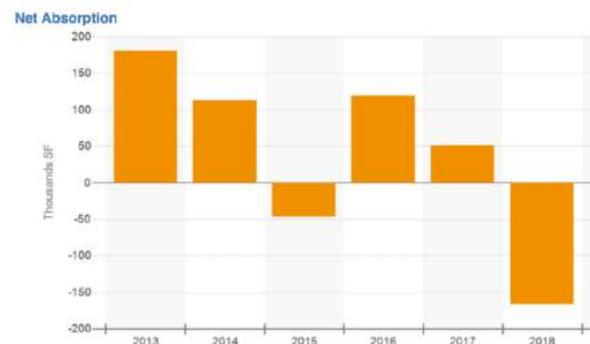
Source: City of Lauderdale

### Commercial Net Absorption Rate

Lauderhill has a dramatically lower commercial net absorption rate compared to its neighbors. Net absorption is the amount of commercial space that was leased compared to the amount of commercial space that became vacant in an area for a given time period. Positive net absorption is when more space is leased than becomes vacant, and negative absorption is when more space becomes vacant than is leased.<sup>8</sup> As the graphs illustrate, Lauderdale's commercial absorption rate has been trending lower, compared to Broward's, which has remained positive.

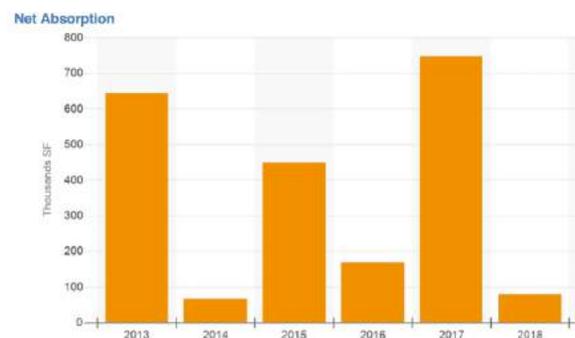
Figure 13. Net Absorption Rates

#### Lauderhill



Source: City of Lauderdale

#### Broward County



Diversity of Ownership

Section 163.340(8)(m) Diversity of ownership or defective or unusual conditions of title which prevent the free alienability of land within the deteriorated or hazardous area.

The Swap Shop

The most notable landmark in the study area is the “Swap Shop.” The Swap Shop is located along Northwest 31<sup>st</sup> Avenue and Sunrise Boulevard and is adjacent to the Central Broward Regional Park and Cricket Stadium. Originally constructed in 1963, the Swap Shop has grown in popularity and size, attracting roughly 12 million visitors each year, making it the second most visited tourist attraction in Florida behind Walt-Disney World.<sup>9</sup>



Source: Google Earth Pro Aerial Photo

Figure 14. The Swap Shop



Source: Google Earth

The Swap Shop covers approximately 65 acres, and accounts for a large percentage of developable land within the study area.<sup>10</sup> If redeveloped, it could become a major catalyst for growth. There are also potential synergies between the Swap Shop and the Broward County Regional Park. If the Park is properly leveraged, the area has the potential to transition into a major redevelopment anchor for the city and the county.



## Governmentally Owned Property with Adverse Environmental Conditions

Section 163.340(8)(n) Governmentally owned property with adverse environmental conditions caused by a public or private entity.

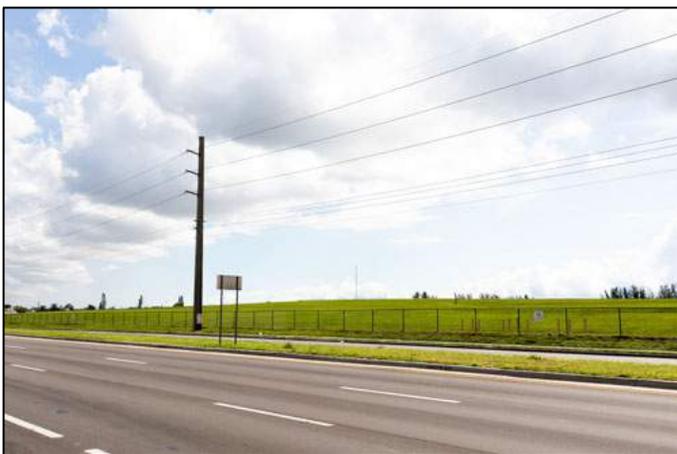
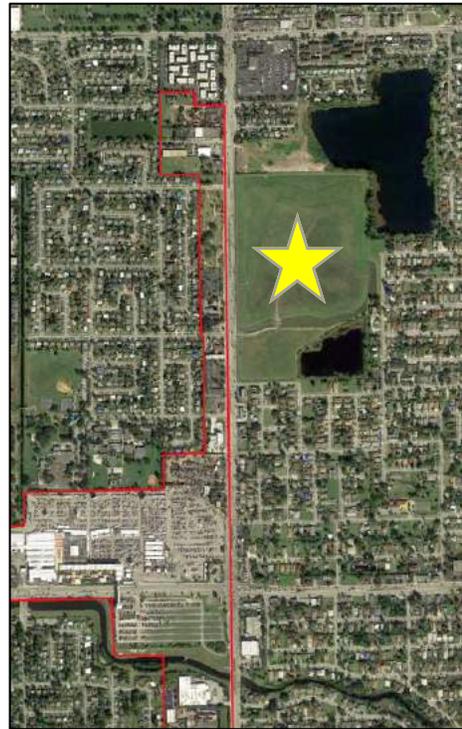
### Wingate Superfund Site

The Wingate Road Municipal Incinerator Dump was constructed in 1954 and operated until 1978.<sup>11</sup> In 1989, the Environmental Protection Agency placed the site on the Superfund National Priority List because it exhibited “contaminated soil, sediment, and surface water resulting from waste and disposal practices.”<sup>12</sup>

The site remains a controversial relic of past public initiatives that placed undesirable projects – like landfills, highways, and incinerators - in low-income areas.<sup>13</sup> The result has been possible contamination of surrounding residential and commercial areas and the loss of valuable land that could have been used for less environmentally damaging purposes. The site is now dormant, and except for continued monitoring by the Environmental Protection Agency, is fenced off and unused.

While not directly in the study area, the Wingate Superfund Site is adjacent to a large swath of the study area. As such, it directly impacts redevelopment in the area and acts as a major inhibitor to future growth.

Figure 15. Wingate Superfund Site



## FINDINGS AND CONCLUSION

This Finding of Necessity has identified several indications of blight as defined by Section 163.355, F.S. Additionally, the study area has a lower median household income, higher rate of poverty, higher unemployment rate, and higher percentage of households requiring food assistance than both the City of Lauderhill and Broward County. The study area is characterized by:

- Poor pedestrian connectivity
- Dangerous roadways
- Inadequate public transportation facilities
- Insufficient parking facilities
- Unsafe and unsightly land uses
- Polluted water runoff facilities
- Abandoned buildings and lots
- Deteriorating structures
- Poor fencing
- Single ownership of large swaths of land
- Adjacent Superfund Site

Therefore, the City of Lauderhill should pursue the creation of a Community Redevelopment Agency to address the many issues facing the study area. The Community Redevelopment Agency should develop a Community Redevelopment Plan with input from community stakeholders. The implementation of a Community Redevelopment Plan will help eliminate challenges that have historically encumbered the area, and provide a focused path forward.

## ENDNOTES

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<sup>1</sup> United States Environmental Protection Agency; *Wingate Road Municipal Incinerator Dump Fort Lauderdale, FL*. <https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0401078#bkgground>

<sup>2</sup> United States Census / American Fact Finder. U.S. Census Bureau's American Community Survey Office 2016.

<sup>3</sup> Id.

<sup>4</sup> Id.

<sup>5</sup> The City of Lauderhill. (June 26, 2018). *Lauderhill Police Department Accident Report*.

<sup>6</sup> Id.

<sup>7</sup> Dr. Martin Luther King, Jr. Montessori Academy. <https://www.browardschools.com/mlking>

<sup>8</sup> CREpedia. (September 28, 2018). *Commercial Real Estate Dictionary*.

<http://www.crepedia.com/dictionary/definitions/net-absorption/>

<sup>9</sup> Tanayshuk, John. *The Swap Shop*. <http://www.southflorida.com/sfl-swapshopstory-story.html>

<sup>10</sup> Pounds, Marcia. (May 1, 2017). *Iconic Swap Shop bequeathed to family: 'It's in the will,' founder said*.

<http://www.sun-sentinel.com/business/fl-bz-swap-shop-business-20170501-story.html>

<sup>11</sup> United States Environmental Protection Agency; *Wingate Road Municipal Incinerator Dump Fort Lauderdale, FL*. <https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0401078#bkgground>

<sup>12</sup> Id.

<sup>13</sup> Chabot, Lucy. (December 25, 1997). *The Killing Fields*. <https://www.browardpalmbeach.com/news/the-killing-fields-6332360>.

# APPENDIX – PHOTO SURVEY

