



October 27, 2014

Mr. John Winkle  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Room W38-311  
Washington, DC 20590

RE: Preliminary Comments on All Aboard Florida

Dear Mr. Winkle:

1000 Friends of Florida, a statewide 501(c)(3) nonprofit membership organization which promotes building better communities and saving special places in Florida, has been actively following the proposed All Aboard Florida (AAF) high speed rail project. We remain committed to the reintroduction of passenger rail service between Orlando and Miami, but in keeping with our mission of building better communities, community compatibility is in the forefront of our priorities.

We are presenting these initial comments prior to the public workshops being held by FRA between October 27 – November 13, 2014, and will be supplementing these comments with a final comment letter prior to the December 2, 2014, comment deadline. Our preliminary review of the Draft EIS has identified numerous important, unresolved issues needing attention. We cannot support a project which does not adequately address the quality of life, safety, access and cost issues associated with the entirety of this project. If that proves impossible, then 1000 Friends will enter its strong objections to the project as proposed.

With many members in the North-South Corridor between Cocoa Beach and north of West Palm Beach, we are particularly concerned with project impacts that adversely affect the quality of life currently enjoyed by citizens in this area. As the primary community economic benefits reside with station stops outside of the North-South Corridor, we believe it is incumbent upon AAF and the Federal Railroad Administration (FRA) to ensure that quality of life impacts are appropriately mitigated. Unfortunately, the Draft EIS remains fixated on the terminuses of the AAF project, virtually ignoring the many communities and citizens in between Cocoa Beach and Jupiter.



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One of our issues is the proposition of 32 additional trains crossing the Loxahatchee and St. Lucie rivers via **draw bridges** that are almost a century old. With delays to private and commercial recreational boats, and the related **economic harm** to marine businesses, as well as delays to emergency vehicles caused by frequent closures, we understood that the DEIS would address this concern. Only very perfunctory assurances were provided, and to the extent that adverse economic impacts were identified, these were brushed off as not being significant to the public in the North-South Corridor due to positive benefits elsewhere. We believe this has significant impacts to the economy due to impacts on recreational fishermen and marinas. It also has serious implications emergency vehicle operators (police, fire, ambulance, etc.) for whom life and death situations are often measured in minutes.

Although only freight trains currently use the tracks, each lowering of a bridge closes the waterway for up to 20 minutes. These are old bridges which frequently require repairs, including one incident at the New River Bridge that caused almost a 1 hour delay. Under AAF's proposal, the freight trains would continue to use these bridges as well, to make a total of 42 to 46 trains a day. The planned expansion of Port Everglades, and possibly the Port of Miami to accommodate PANAMAX ships, means freight on the tracks is expected to increase which the DEIS acknowledges. These closings will also impact access to the Okeechobee Waterway as well as upstream marinas.

We believe these concerns are particularly critical for the bridges across the St. Lucie River at Stuart, the New River in Ft. Lauderdale and the Loxahatchee River in Jupiter. The magnitude of these concerns, and the number of public comments received to date by the US Coast Guard caused it to postpone scheduled public hearings in an attempt to adequately respond. Can the DEIS realistically move forward without resolving this?

We do support alternative modes of travel that among other things can help alleviate **traffic congestion in corridors such as I-95**. However, it is disingenuous to state as the DEIS does that one of the justifications for the project is the freed up capacity on I-95. The contribution from AAF ridership will be small, and FDOT projections, even without this project, show that I-95 will be over capacity in the near future regardless. As a result, the Vehicle Miles Traveled (VMT) savings for cars that otherwise might use the I-95 corridor overstate the supposed benefits related to air quality, energy and related savings.

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Regarding **noise impacts**, we note on Page 5-39 of the DEIS, "The project would result in long-term noise and vibration adverse impacts to residents and properties primarily along the N-S Corridor." Mitigation to eliminate this is based on an AAF commitment to install wayside horns, but no documentation confirms this. Note also though that construction noise at the "human annoyance" level would impact 693 residential and 61 institutional impacts (p.5-54) in the N-S Corridor. Again, we find no documentation regarding how such impacts are to be mitigated. In addition, it remains unclear as to the local government costs associated with installation and maintenance of "quiet zones".

Although the proposed passenger service would not transport **hazardous materials** (Table 5.2.4-1) as would the increasing freight activity, we found nothing that recognized the potential impacts for a passenger/freight collision or a freight accident/derailment in the North-South Corridor. Given the projected population increases in this corridor, it would seem prudent to either restrict the transport of hazardous materials or identify additional safety measures now prior to any increase in freight and passenger service.

We have heard repeatedly about the impacts of the existing **freight trains**, currently running 12 times/day in this area. With an average length of more than 1.5 miles and projected increases coming due to the PANAMAX improvements, accommodating this increase while adding passenger service can only mean additional delays for the public and service vehicles. The DEIS acknowledges this without providing any details as to why this will be manageable. The fear expressed by many of our members is that the second track being constructed for passenger service could also accommodate significantly more freight trains which would bring even longer delays at intersections. We were unable to identify any safeguards that address this very real concern.

1000 Friends is involved with ongoing efforts to deal with climate change in a variety of venues, especially **sea level rise**. While the DEIS acknowledges the need to address this through construction standards, it simply says that such construction will be subject to USACE permit requirements. We would like to know what such standards involve and how they would ultimately be implemented.

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Without documentation, the DEIS says that the only **property value** impacts are positive and are attributed to projected increase values in and around the stations in Miami, Ft. Lauderdale and Miami. No mention is made of property value declines in the North-South Corridor. This is an issue that bears further review, and we will revisit this after the Martin County Property Appraiser complete the assessment study he is now conducting. A cursory scan of available literature does not rule out a decline in values for properties not in the vicinity of a station.

Other than acknowledging that the North-South Corridor bisects Jonathan Dickinson State Park (2 crossings) and borders the Hobe Sound National Wildlife Refuge, **wildlife impacts** assessments at these two facilities is limited at best. We would like more information before agreeing that there are no adverse impacts here.

1000 Friends read with great interest the recent **October 14, 2014, letter submitted to you by six (6) area legislators** within the North-South Corridor. The extensive list of concerns involving public health, safety and traffic operations, economic, fiscal, environmental and quality of life impacts do not need repeating in our comments. We do, however, look forward to a robust and complete response to those inquiries, the delivery of which will enable us to make our final comments.

Thanking you for your time and considerations, I am

Sincerely,



Charles G. Pattison, FAICP  
Policy Director

Cc: Office of the Commander  
Seventh Coast Guard District  
Brickell Plaza Federal Building  
909 Southeast 1st Avenue, Suite 432,  
Miami, Florida 33131