



April 16, 2015

Mr. Louis Laubscher, President  
Florida Development Finance Corporation  
c/o Enterprise Florida  
800 N. Magnolia Ave., Suite 1100  
Orlando, FL 32803

RE: FDFC public hearing on AAF

Dear Mr. Laubscher:

I am writing on behalf of 1000 Friends of Florida, a nonprofit smart growth membership organization, to express our grave concerns regarding the bond application for All Aboard Florida being discussed at your April 20 hearing in Tallahassee. Due to many significant and unresolved concerns raised by our members in the "North Corridor" area defined in the Draft Environmental Impact Statement (DEIS) and shortcomings we have identified, we respectfully request that the bond application not be approved.

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 do not believe that using bond proceeds to support the AAF project as currently planned is consistent with the quality of life and viability of communities in this part of Florida.

Our preliminary and final reviews of the DEIS identified important, unresolved issues impacting 40 communities between Jupiter and Cocoa Beach related to safety, access and costs associated with the project. Approving the bond application would mean subjecting area local governments to undetermined costs and expenses and citizens to significant impacts.

The primary community economic benefits of the project occur at 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 throughout the length of the project.

We trust you have seen and reviewed the October 14, 2014, letter submitted by six (6) area legislators within the North-South Corridor (copy attached). 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 but clearly raise many red flags.

Additionally, quality of life concerns are reflected in the many opposing resolutions adopted by the following municipalities, counties, associations and agencies:

**1000 Friends of Florida** P.O. Box 5948 • Tallahassee, FL 32314-5948 • PHONE 850.222.6277 • FAX 850.222.1117

**Board of Directors** Timothy Jackson, *Chair*; Victoria Tschinkel, *Vice Chair*; F. Gregory Barnhart, *Secretary*; Terry Turner, *Treasurer*  
Jim Nicholas, Roy Rogers, Mark Watts • Nathaniel P. Reed, *Chairman Emeritus*; Lester Abberger, *Emeritus*; Robert Davis, *Emeritus*; Earl Starnes, *Emeritus*  
**President** Ryan Smart

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• Treasure Coast League of Cities	• Vero Beach
• Port St. Lucie	• Village of Tequesta
• Sebastian	• Mariner Sands
• Barefoot Bay	• Jupiter Inlet Colony
• Town of Jupiter	• Town of Jupiter Island
• City of Stuart	• Sailfish Point
• Ft. Lauderdale City Commission	• Ft. Pierce
• St. Lucie Village	• North Hutchinson Island
• Sewall's Point	• Indian River County
• Martin County	• St. Lucie County
• Preservation Pointes Property Owners Association	• Indian River Taxpayer Association
• Guardians of Martin County	• St. Lucie County Fire District
• Micco Homeowners Association	• Overtown Residents
• Marine Industries Treasure Coast	• The Oaks at Indian River
• Jupiter Inlet District.	• North Beach Civic Association

1000 Friends of Florida's concerns are as follows:

1. **Delays Related to AFF** – Construction of AFF will result in 32 additional trains crossing the Loxahatchee and St. Lucie rivers via almost century-old draw bridges, causing delays to private and commercial recreational boats, commuters and emergency vehicles due to frequent closures. While the DEIS was to address this concern, only very perfunctory assurances were provided.
2. **Cumulative Delays** -- Currently, freight trains use the tracks 12 to 14 times a day, with each lowering of the bridge closing the waterway for up to 20 minutes. Recently, the lifting mechanism at New River Bridge failed, causing an almost 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.
3. **Potential Delays** -- The planned expansion of Port Everglades and possibly the Port of Miami to accommodate PANAMAX ships means freight traffic is expected to increase, as acknowledged in the DEIS. These closings will also impact access to the Okeechobee Waterway as well as upstream marinas. 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 fear expressed by many of our members is that the second track being constructed for passenger

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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.

4. **Economic Impacts** -- Identified adverse economic impacts were brushed off as not significant to the public in the North-South Corridor due to positive benefits elsewhere. This ignores impacts on recreational fishermen who won't be spending money because of such delays and marina owners who will lose business.
5. **Health and Safety Impacts** -- Delays of the nature described above have special significance for emergency vehicle operators (police, fire, ambulance, etc.) and citizens due to life and death situations which often are measured in minutes.
6. **Noise Impacts** -- Page 5-39 of the DEIS cover these impacts noting that "The project would result in long-term noise and vibration adverse impacts to residents and properties primarily along the N-S Corridor." AFF committed to mitigate this through installation of wayside horns to lessen the impacts of noise, but no documentation confirms this. The DEIS also notes that construction noise at the "human annoyance" level would impact 693 residential and 61 institutional impacts (p.5-54) in the N-S Corridor. There is 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."
7. **Hazardous Materials** -- Although the proposed passenger service would not transport hazardous materials (DEIS Table 5.2.4-1), the freight trains do. We found nothing addressing potential impacts for a passenger/freight collision or a freight accident/derailment in the North-South Corridor. Can bond covenants adequately address this situation? 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.
8. **Sea Level Rise** -- Given the vulnerability of this area to sea level rise, there is a pressing need to address this through construction standards that should be part of any bond consideration.
9. **Property Values** -- 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 the Martin County Property Appraiser is now conducting an assessment study. A cursory scan of available literature does not rule out a decline in values for properties not in the vicinity of a station.

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10. **Incomplete Analysis** -- At this time, we find that the DEIS is at best incomplete, especially with respect to the proposed project's North-South Corridor. It is thus an inadequate basis for making an informed decision on bond approvals. While it is our understanding that the bond proceeds would not be used in this area, it is not reasonable to consider the impacts of the AAF project here. The quality of life issues of importance to us would be adversely impacted by the proposed project in the North-South Corridor given the information currently available. We reach this conclusion in light of negative economic impacts to the marine industry, and public and private land values within the buffer areas. We found that substantial and competent information gathered by Martin County calls into question both transportation and boating navigation assessments found in the DEIS. Additionally, impacts to Community Redevelopment Areas, including minority populations, need more current data and analysis than what was used. We also found that the DEIS did not fully explore alternative routes due to a narrowly defined project consideration heavily weighted on economic factors. This approach meant that the alternative route using the CSX line for both passenger and freight service received a negative assessment even though it avoided many of the adverse impacts that would otherwise be found in the North-South Corridor. How can a bond decision be appropriately made without such critical information?

For all of the above reasons, we ask that you not approve the AAF bond request at this time. Thanking you for your time and considerations, I am

Sincerely,



Charles G. Pattison, FAICP

Policy Director

Attachment: October 14, 2014 Comment Letter



# TREASURE COAST LEGISLATIVE DELEGATION

751 SE PORT ST. LUCIE BLVD.  
PORT ST. LUCIE, FL 34984  
(772) 871-7660  
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CHAIR

REP. GAYLE HARRELL  
VICE-CHAIR

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DISTRICT 84

MARYLYNN MAGAR  
DISTRICT 82

DEBBIE MAYFIELD  
DISTRICT 54

CARY PIGMAN  
DISTRICT 55

John Winkle, Director  
Federal Railway Administration  
1200 New Jersey Ave, S.E., Room W 38-31  
Washington, D.C. 20590  
Via email: [AAF\\_comments@vhb.com](mailto:AAF_comments@vhb.com)

Re: Draft Environmental Impact Statement on All Aboard Florida

Dear Sir:

The intent of the Draft Environmental Impact Statement (DEIS) regarding All Aboard Florida's (AAF) proposal to provide intercity passenger rail service between Miami and Orlando is to disclose all environmental effects associated with the project whether they are beneficial or adverse and allow the public to comment on them. Please accept this letter as the combined comments of the undersigned Members of the Legislative Delegations for Martin County, St. Lucie County and Indian River County.

Having read the DEIS, we would like to express our deep concern over the findings of the report. We share the concerns of our fellow citizens of the Treasure Coast as they have expressed them to us individually or corporately through their elected bodies in Resolutions passed by Martin, St. Lucie and Indian River counties, along with the cities of Stuart, Port St. Lucie, Fort Pierce, St. Lucie Village and Vero Beach.

It is evident from the DEIS that the AAF proposal to run 16 round trip, high speed trains from Miami to Orlando concentrates the public benefit in communities where stations are proposed, Miami, Fort Lauderdale, West Palm Beach and Orlando, with virtually no public benefits north of Palm Beach County. We also feel that the DEIS does not adequately address the specific negative impacts AAF would have on the citizens of the Treasure Coast. It minimizes or narrowly touches on the health, safety and traffic operations, economic, fiscal, environmental and quality of life impacts our residents and local governments will experience as a result of the approval of All Aboard Florida. **(See attached list.)**

The addition of a second track, the straightening of curves and modification of bridges by AAF will also significantly increase the capacity of the Florida East Coast Railroad to transport freight. We have great concerns about the anticipated increase in the number and length of

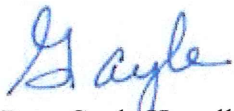
freight trains that will pass through our communities. The DEIS estimates that the number of trains will increase from 10 to 20 per day by 2019 and the length of each train will increase to over 8,100 feet. The negative impact on vehicular and marine traffic of 52 road and bridge closures per day (20 freight and 32 passenger trains) on our communities will be very significant, especially given the fact that the AAF tracks run through the downtown sections of several cities on the Treasure Coast and cross the St. Lucie River and Loxahatchee River at various locations.

In addition to the above concerns, we question the accuracy of the estimated ridership of approximately 3.5 million passengers per year in 2019 and exceed 4 million by 2030. At a time when most passenger rail in the United States has to be subsidized by government in order to remain operational and has limited ridership, we question the assumption that by 2019 3.5 million visitors or local residents per year will forgo driving or flying between Miami, Ft. Lauderdale or West Palm Beach to Orlando to use AAF.

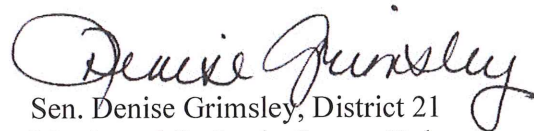
The undersigned Members of the Martin County, St. Lucie County and Indian River County Delegations respectfully request that prior to approving the All Aboard Florida loan or project you carefully and specifically address the concerns expressed in this letter as well as those presented by local governmental entities and the citizens of the Treasure Coast. Should AAF be unable to ameliorate adequately the specific negative impacts of this project on the citizens of the Treasure Coast, we recommend that the loan be denied and the project rejected.

Thank you for your careful consideration of this very important matter.

Sincerely,



Rep. Gayle Harrell, District 83  
Martin and St. Lucie County Delegation



Sen. Denise Grimsley, District 21  
Martin and St. Lucie County Delegation



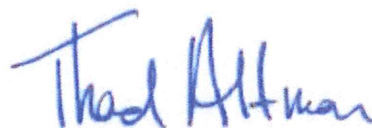
Rep. MaryLynn Magar, District 82  
Martin County Delegation



Rep. Larry Lee, Jr., District 84  
St. Lucie County Delegation



Rep. Debbie Mayfield, District 54  
St. Lucie and Indian River County Delegation



Sen. Thad Altman, District 16  
Indian River County Delegation

### **Public Health**

According to the DEIS, “the project would have an overall beneficial effect on public health, safety and security in the rail corridor.”

We believe this is to be inaccurate regarding the Treasure Coast.

- Fifty two closures a day will have significant negative impact on emergency vehicles, patients and on-call physicians traveling to our communities’ hospitals. For patients being transported by ground or water for cardiac, stroke, neurological, OB, or respiratory problems even slight delays in accessing critical services can result in adverse patient outcomes and possibly death.
- There is only one track through downtown Stuart and the plan does not envision the construction of a second track thus eliminating the coordination of simultaneous train crossing to reduce the number of street closures.
- The railroad bridge was constructed in 1894 and frequently takes up to 20 minutes to close. Trains coming from the south must wait for the closure of the bridge to transverse it. This blocks traffic coming from the east to access Martin Memorial Hospital North.
- Fifty two closures a day of these roads will make it very difficult for patients living east of the railroad track to access the services of Martin Memorial Hospital North

### **Safety and Traffic Operations**

According to the DEIS, there are 78 grade crossings on the Treasure Coast. Road closures and traffic delays along major roads will have a significant impact on the following roads:

#### **Indian River County**

- Oslo Road at U.S. 1
- Oslo Road at Old Dixie Highway
- East and westbound State Road 60, known as the Twin Pairs

#### **St. Lucie County**

- Seaway Drive at Florida East Coast Railroad
- Seaway Drive at U.S. 1
- North Causeway Bridge at Old Dixie Highway

#### **Martin County**

- Southeast Indian Street at Florida East Coast Railroad
- Southeast Dixie Highway at Southeast Indian Street
- East Monterey Road at Florida East Coast Railroad
- Monterey Road at Southeast Dixie Highway

According to the DEIS the addition of 32 passenger trains per day would create “some degradation” in the level of service at grade crossings.

We feel that this is a significant understatement of the impact.

- With more than three trains per hour at some locations, a significant percentage of those hours would operate under unacceptable levels of service. This only addresses the addition of 32 passenger trains per day and does not include the anticipated increase in the number and length of freight trains.
- The worst stretches of delays would grow from 2½ minutes to 7½ minutes each peak hour at Oslo Road in Indian River County; from 2 to 6½ minutes at the eastbound and westbound State Road 60 crossings in Vero Beach; and from 2 to 5½ minutes at the Indian Street/Dixie Highway crossing in Stuart. Peak-hour traffic, which now grinds to a standstill 4 minutes of every hour, would hit gridlock for 11½ minutes of every hour.
- Traffic delays for motorists headed east to the barrier island on Seaway Drive and the railroad tracks in Fort Pierce would nearly triple.
- Currently, freight trains can tie up northbound U.S. 1 traffic at least a city block back from Seaway Drive, leaving drivers sitting several minutes in the right lane, waiting for the train to pass.
- There is only one track through downtown Stuart and the plan does not envision the construction of a second track thus eliminating the coordination of simultaneous train crossing to reduce the number of street closures.
- The railroad bridge was constructed in 1894 and frequently takes up to 20 minutes to close. Trains coming from the south must wait for the closure of the bridge to transverse it.
- Most of the other crossings studied also showed anticipated increases in wait times.

### **Economic impact**

We have great concerns about the impact of AAF on the economy of the Treasure Coast.

- Marine industries: The railroad bridge over the St. Lucie River in Martin County was built in 1894 and has a very low clearance. Most boats of any size or with a fishing tower cannot pass under a closed bridge. On a routine day the bridge is down approximately 5-10 minutes for each train traveling through down town Stuart. The impact on the local marine economy in Martin County will be devastating.
- Local businesses and restaurants: AAF tracks run through the heart of the downtown sections of Stuart and Ft. Pierce where many restaurants and business establishments are located. Fifty road closures of road going into the cities will make it difficult to citizens to enter the downtown area and have a significant negative impact on the business and tourist establishments.

### **Fiscal impact**

It is clear from the DEIS that a significant portion of the financial resources needed to provide the upgrades of infrastructure necessary to provide passenger rail service will not be coming from private sources, but will be paid for by a \$1.6 billion federal loan.

- We have grave concerns that AAF will not have the ability to repay a \$1.6 billion federal loan given the questionable estimated ridership.

- It is also evident from testimony of local cities and counties that there will be an additional fiscal impact imposed on the citizens of the Treasure Coast.
- There are a total of 352 rail crossings including 78 grade crossings on the Treasure Coast. Local governments may be required to bear the construction and maintenance costs of upgraded railroad crossings and the costs of installing and maintaining any quiet zones.
- AAF is creating unfunded mandates for cities and counties including the cost of crossing upgrades, quiet zones and increased leases.

### **Environmental Impact**

The report states, “the project has the potential to adversely affect land use, transportation (particularly traffic at-grade crossings), noise and vibration, water resources, wetlands and floodplains, biological communities, and protected species.”

We agree with this statement. However, the report does not address the necessary mitigation measures required to reduce the potential adverse effects.

- The project as proposed would significantly impact the Treasure Coast’s endangered environment, including our rivers and the Indian River Lagoon. The state and local county governments have spent billions on efforts to restore them and have great concern about the impact of 52 trains per day crossing these waterways.
- There are also many endangered species living in Jonathan Dickinson State Park which would be impacted.
- The Treasure Coast would not experience the projected air quality improvements and energy consumption improvements since there will be no stops of AAF along the Treasure Coast.

### **Quality of Life Impact**

The DEIS stated that this project would “benefit elderly and handicapped individuals by providing a transportation option that will enhance mobility and livability in their communities,” This is not true for the Treasure Coast.

- There will be no local access to the services provided by AAF.
- Riders will have to provide their own transportation to West Palm Beach in order to access AAF’s services.