

Surface Transportation Board

Incoming Correspondence Record

#EI-20745

Correspondence Information

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Recorded by David Navecky on 12/29/2014

*Docket #:	FD 35852 0	Affiliation:	Self / Individual
*Name of Sender:	David Rust	Letter Type:	Letter w/ Attachments
Group:			
Attention Of:			
*Date Received:	12/15/2014	NEPA Type:	Scoping
Date of Letter:	12/09/2014	In Public Docket?	☐ Yes ☒ No
Group's Address:	3485 Sunset Ridge Dr		
		Phone Number:	
Group's City:	Merritt Island	Email Address:	
Group's State:	FL	Group's Zip Code:	32953-

Submitter's Comments

STB's Comments

Image Attachment(s)

An attachment has not been added.

EI-20745
Rec'd 12/15/14

December 9, 2014

Col (R) David H Rust
3485 Sunset Ridge Dr
Merritt Island, Florida 32953

Mr Dave Navecky
Surface Transportation Board
ATTN: Environmental Filing
Docket No. F35852
395 E Street, SW
Washington, DC 20423-0001

Dear Sir:

I am writing to submit comments regarding the proposed rail extension from the Port of Cape Canaveral across the Banana River, part of the Indian River Lagoon.

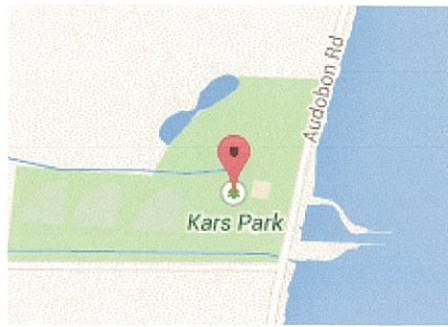
I would like to point out to the STB that a few years ago environmentalists were calling for the removal of all causeways in the Indian River Lagoon as a means of restoring the Lagoon to its original healthy state. Now this proposal would add to the causeway disruption of natural water flows.

During the recent mid-term elections, we had a number of politicians promise to seek money for the restoration of the Lagoon. We had NONE promise to support measures that would add to the continuing destruction of the Lagoon. In fact this rail extension was a closely held proposal until after the election. Announcing it in the Federal Register on October 27 carried little risk that average citizens in the impacted area would note it and contact their politicians.

You will hear much more about the effects of the proposed rail on the Indian River Lagoon. My own question is: Why build a rail line through a protected area when there is an existing road bed that could be used?

The eastern boundary of Kars Park features a north/south road (Audoban Road) that could be developed as a rail bed at significantly less cost than the proposed route and would avoid much of the damage that would be inflicted on the currently protected

Merritt Island Wildlife Refuge.



The obvious problem is that this is the main service road in Kars Park (see attachment 1). It is my contention that Kars Park is run down and excess to NASA needs. It was initially developed for the use of NASA employees. NASA now has only a fraction of the employees it had when this park was opened. As a result, the Agency has resorted to extension of eligibility to use the park to all manner of people unrelated in any way to NASA or the Space Center. Current eligibility (from the Kars web site):

Active, badged NASA / KSC / CCAFS / PAFB Civil Service, Military and Contractor employees, their family members and guests, and official visitors of KSC

- Other NASA employees who are KSC tenants
- NASA / KSC / CCAFS / PAFB Civil Service and Contractor retirees (must provide evidence of NASA / KSC / CCAFS / PAFB employment at the time of retirement)
- Current Grandfathered club, sports league, and affiliated organization members who possess a current calendar year KARS membership card will be permitted to renew their KARS membership
- Active or retired military personnel must have DOD identification. A Veterans Administration health medial card does not qualify.

Even this extended membership eligibility does not justify the existence of this ancient operation so the guest policy limits those with Kars passes to ten guests. TEN! In short, a Patrick Air Force Base contractor can bring ten guests to use the Kars facilities. It is apparent that these facilities are excess to the needs of Kennedy Space Center.

Even stretching the eligible population does not make Kars Park a feasible operation. To further expand their identity, they sell parking spaces to anyone with five dollars to watch NASA launches. Is it even legal for a non-appropriated fund activity to rent government property to individuals to watch a federal government operation? Most of us (tax payers) feel we have already paid for this.

Kars buildings are ancient. The launch ramp is largely unused because once you launch, you can only go east or south. The pier ends in about eight inches of water so there is never any fishing done there.

Does Kars Park serve a useful function for Brevard County? Here are the “near-by”

park facilities:

- Kings Park
- Kelly Park
- Jetty Park
- Banana River Aquatic Preserve
- Merritt Island National Wildlife Refuge
- Parrish Park
- William Beardall Tosohatchee State Preserve
- Saint Johns National Wildlife Refuge
- Fox Lake Park
- Canaveral National Seashore
- Hatbill Park
- Christmas Park
- Mosquito Lagoon Aquatic Preserve
- Brevard County Game Refuge
- Spessard Holland Park
- Bull Creek Wildlife Management Area
- Moss Park
- Jay Bergman Field
- Farmton Wildlife Management Area
- Lake Claire Recreational Area
- Eddie Graham Sports Stadium

In fact, Brevard County has 108 parks. There are no residences in Kars Park so it is safe to say that everyone who uses the KSC park lives closer to a Brevard or Titusville park.

Everyone who enters Kars Park must pass the entrance to Mitchell Ellington Park. This park features:

Ball Fields

- 4 baseball fields (lighted): 2-story facility with restroom, concession, sound booth
- 6 soccer fields (2 lighted)
- 2 softball fields (lighted): 2-story facility with restroom, concession, sound booth
- 2 football fields: 2-story facility with restroom, concession meeting room
- 2 tennis courts (lighted)
- Boardwalk
- Pedway (0.93 miles)
- Playground
- 2 pavilions 40x60 ft (serving area & restroom)

- Open grassy area

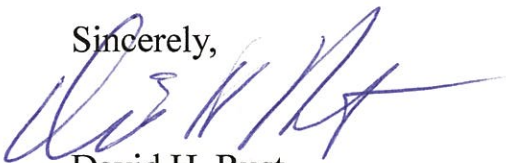
It should be apparent that Kars Park serves no useful function and is, in fact, excess to the needs of both Brevard County and KSC. There is a Kars Park II (See attachment 2) that remains to serve the recreational needs of KSC civil servants.

The current preferred option has the rail line entering Merritt Island and proceeding West until it can turn north while avoiding Kars Park. Once the line gets north of Kars park, it swings back east and follows the shore line. This option vastly extends the environmental damage to the Merritt Island Wildlife Refuge, expands the cost and puts the rail line approximately .30 miles closer to the residential area on the west side of the preserve. It is obviously cheaper and less destructive to follow the shore line through Kars Park. The road bed presently exists so the environmental damage has already been done (see attachment 3)

The major problem with this EIS system is the lack of credibility. A huge project such as the rail extension demands that the operators seek the largest return on investment that can be achieved. Yet, we are given load numbers that indicate minimum usage. No one believes that, especially following comments by the designers of the Affordable Care Act that we, as voters, are considered "stupid".

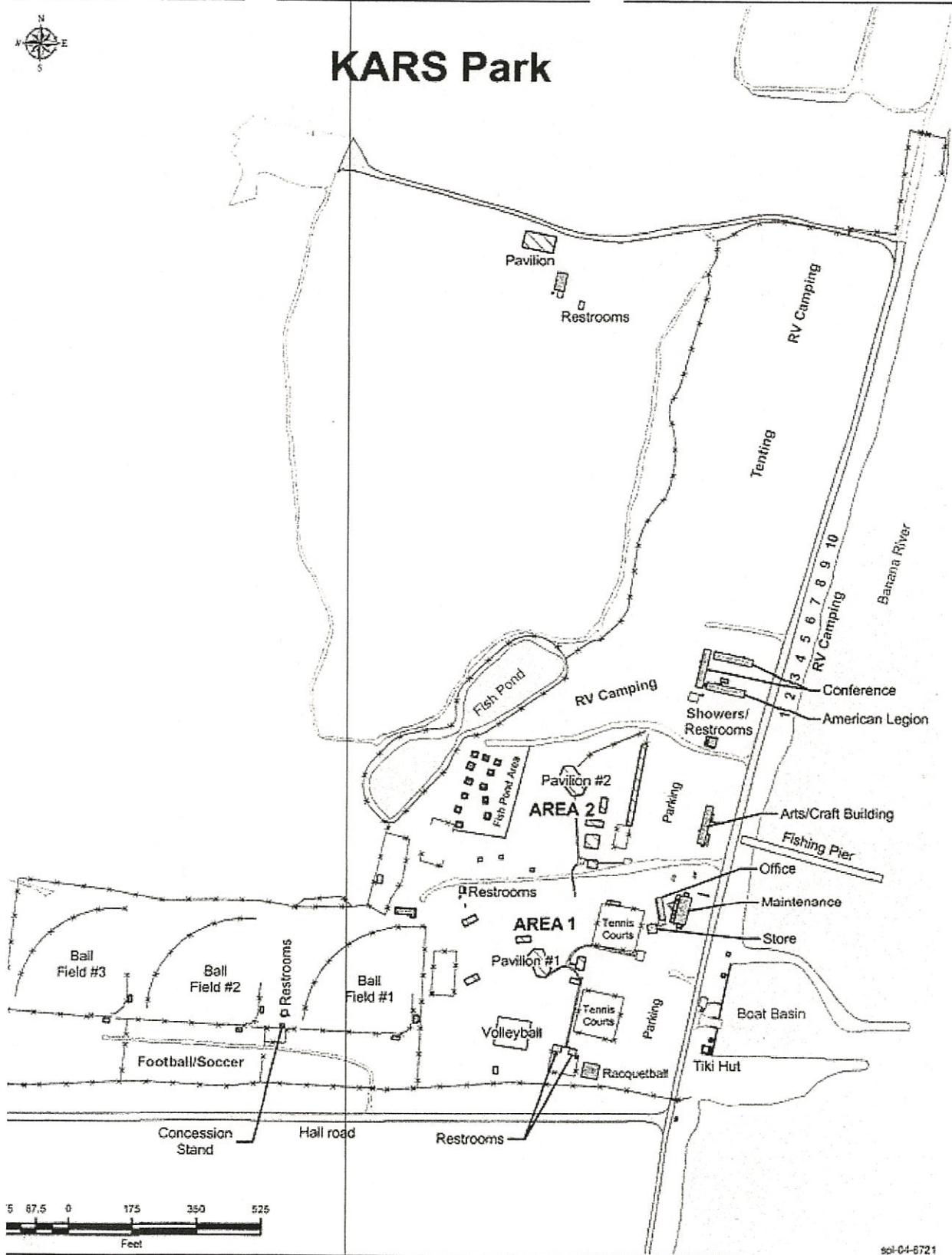
I urge you first, to deny the causeway across the Banana River and direct the Port to pursue the option of extending the rail through the Canaveral Air Station. Failing that, they should be directed to proceed with a route that takes the rail down Audobon Road on the east side of Kars Park.

Sincerely,



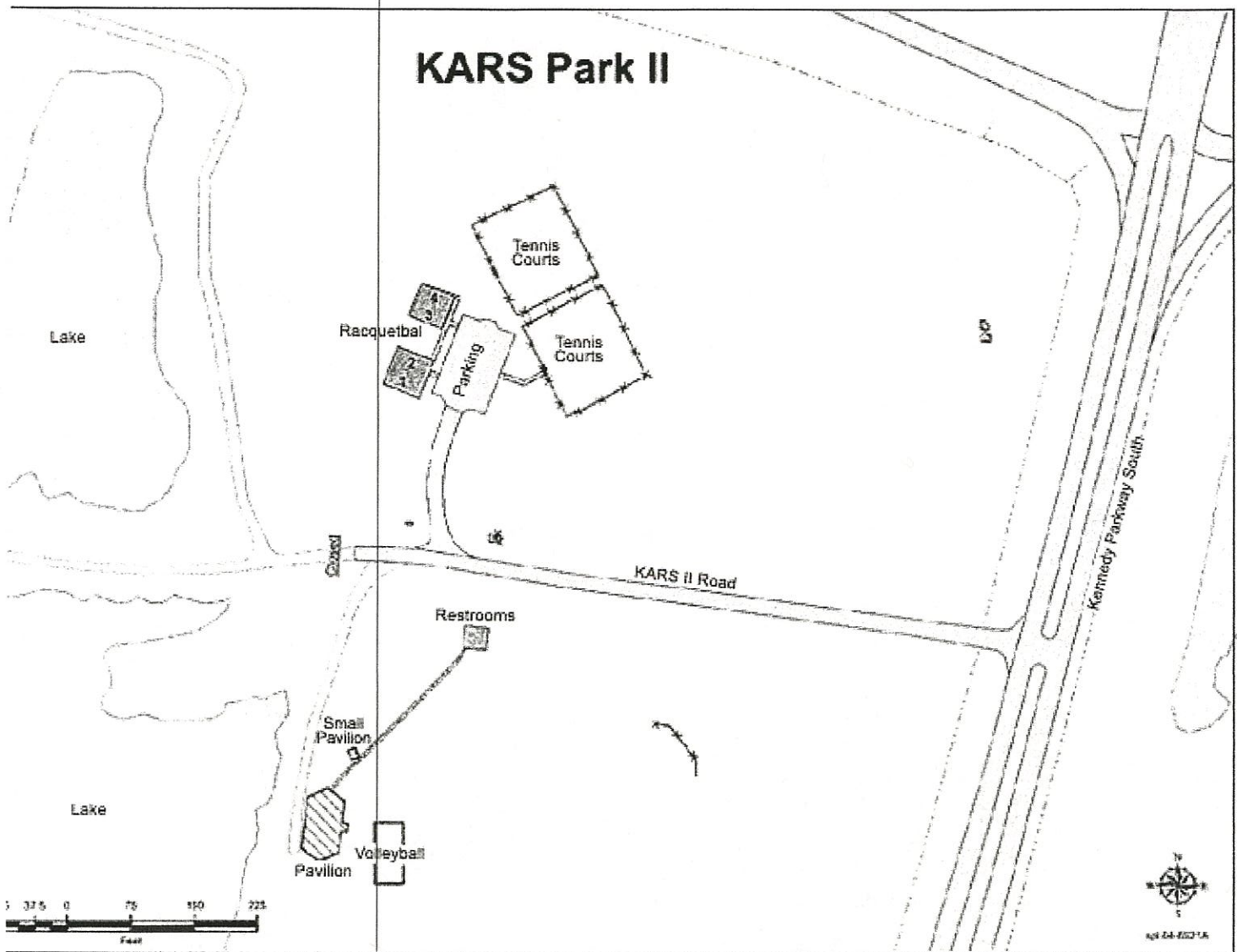
David H. Rust
Col USA (Retired)

KARS Park

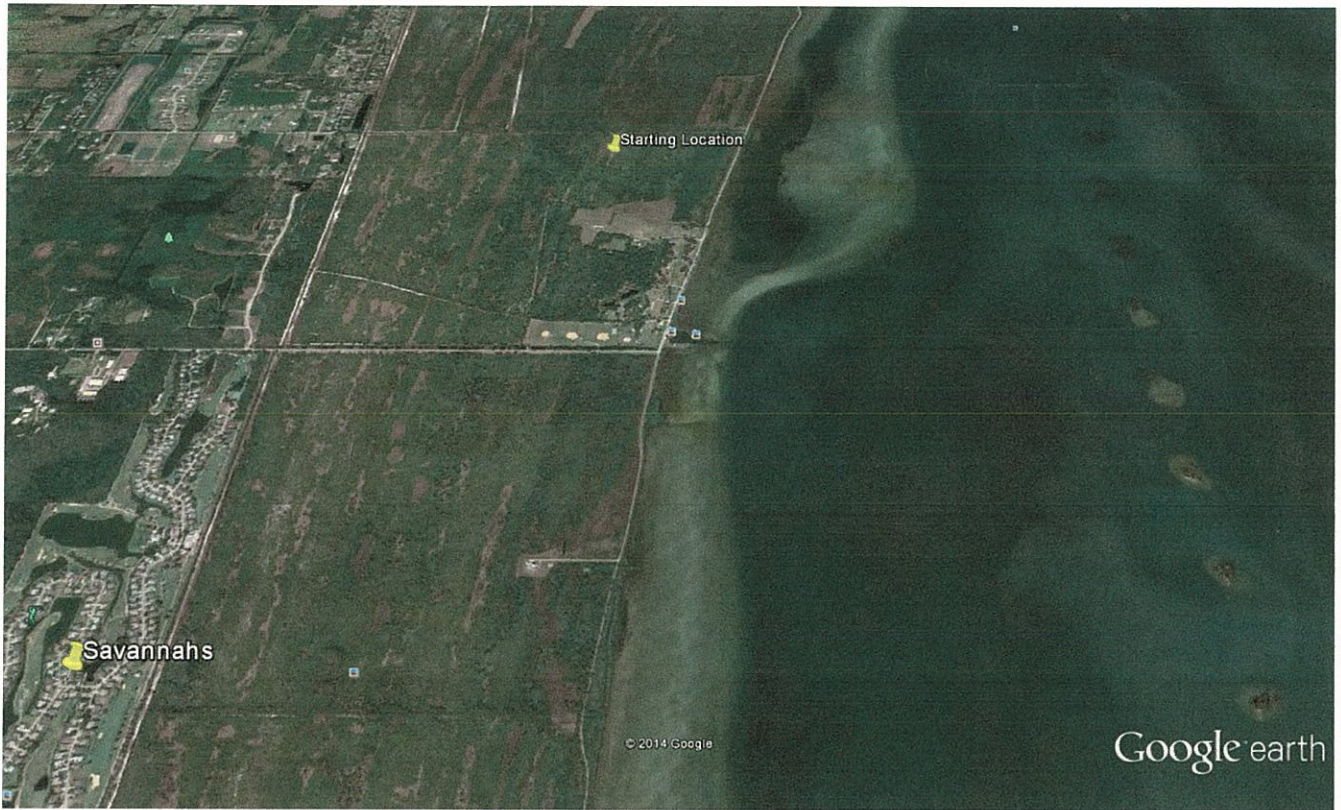


ATTACHMENT 1

KARS Park II



ATTACHMENT 2



ATTACHMENT 3