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John F. Durkee, Jr.
1700 Westport Rd
Merritt Island, FL 32952

Mr. Dave Navecky
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

RE: Environmental Filing, Docket No FD 35852

Mr. Navecky,

Thank you for the detailed presentation of the process and agencies that will be involved in the proposed cross Banana River rail line (requested by Port Canaveral).

As a resident of Merritt Island who lives roughly 3 miles south of the proposed route(s) and who fishes the Banana River routinely, I respectfully add my thoughts, questions and comments.

Considering the efficiencies of rail vs. over-road trucking, rail uses far less fuel and emits far fewer emissions. Thus I am not opposed to the use of rail in this situation.

I am however wholly opposed to the design using a wide fill roadway and relatively small trestle bridge and suggest an alternative design with (hopefully) less negative impact upon the waterway environment.

Living on the Banana for 25 years I have observed the continual decline in water quality. I have reviewed the monthly water samplings conducted by the St Johns Water Management Authority (documenting various metrics of water quality). I have observed the negative impact upon bottlenose dolphin, the (Florida) Manatee, water and shorebirds and the general game fish populations. The Banana, the Indian River Lagoon and National Wildlife Refuge exist in a delicate balance between development and nature.

Key to the health of the ecosystem, as there is no tidal flow in this area, is the wind driven flow of lagoon waters. Depending on the season and prevailing winds water flows generally north or south. The movement of waters is significantly restricted by fill and roadways constructed many years ago. These designs would not be acceptable today as we now understand the related benefits of free flowing waters: cleansing of nitrogen (through algae's and grasses), oxygenation and reduction of bottom muck build up. Today we would build bridges allowing the flow of waters.

There is a large population of the federally endangered manatee population in this area. I frequently observe manatee travelling below roadway bridges and between

bridge pilings. I have never observed a manatee crossing a filled roadway. During the period of September thru early November large schools of the protected game fish (Redfish) gather in schools for breeding. These large schools move (daily) throughout the Banana River from areas well north of the proposed rail line (in the No Motor Zone) south to below Cocoa Beach, and back again. Fishing this area regularly I observe the movement of these breeding schools of Reds. Like the manatee, I have never observed Redfish crossing a filled roadway.

As this is an environmental assessment specifically what impact would the proposed fill and roadway have on the flow of waters and water quality vs. a full-length bridge construction crossing the Banana River?

As the Redfish is a State of Florida protected game fish, what is the impact of the proposed fill and roadway during the months of September thru November on the travel and breeding patterns of the Redfish population in the Banana River?

My concerns are specific to the method of the proposed crossing of the Banana River as that is an area I am intimately familiar with. I will leave to others to discuss the impact (if any) of a rail travelling thru land sections KSC.

Proposed Alternative: based upon your findings regarding the impact on water quality due to restricted flow and potential impact on marine wildlife, I would encourage the rail crossing the Banana River be a full length bridge with very limited filled roadway.

As you consider the environmental impact of the proposal I ask you to consider that 'the Merritt Island National Wildlife Refuge is a place like no other. The 140,000 acre refuge ..mild climate enable many temperate and subtropical plants to intermingle providing habitat for rare and unusual species of wildlife. The refuge manages habitat for over 500 species of wildlife. Supporting one of the highest number of endangered and threatened species found with the Nation Wildlife Refuge system..' Sound familiar? This taken directly from the introduction of the pamphlet published by the US Fish & Wildlife Service, March 2014. It is through this habitat the proposed rail path runs.

Thank you for your sincere consideration of the proposal, objections and potential modifications.

Regards,

John F. Durkee Jr.

