



National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899

January 9, 2015

Reply to Attn of: TA-A4C

Surface Transportation Board
Attn: David Navecky
395 E Street SW
Washington, DC 20423

Subject: Surface Transportation Board (STB) Notice of Intent to Prepare an Environmental Impact Statement (EIS) and Conduct EIS Scoping for the Canaveral Port Authority Rail Extension Project

KSC has reviewed the information provided in the Federal Register and at public and agency scoping meetings held November 18-19, 2014. The following scoping response is provided in reference to STB's Notice of Intent (STB Docket No. FD 35852) to prepare an EIS evaluating the potential environmental impacts of the construction and operation of approximately 11 miles of new rail line to Port Canaveral (Port) in Brevard County, Florida utilizing approximately 17 miles of existing rail line at the National Aeronautics and Space Administration's (NASA) John F. Kennedy Space Center (KSC) to make a connection with a main line of the Florida East Coast Railway (FEC).

This written submittal is intended to provide information to support the EIS scoping process and to identify issues and concerns that should be addressed in the evaluation of the Proposed Action. Based upon our evaluation and understanding of the proposed project we respectfully offer the following:

RAIL OPERATIONS

The EIS should describe in detail the proposed and future projected rail operations as well as the construction, maintenance and operational activities associated with the proposal. It is imperative that KSC understand these and the potential effect that they may have on KSC's operational posture.

It is our position that the operation of the proposed rail would be permitted on KSC between sunset and sunrise any day of the week conditional on scheduling approval from KSC and there would be no more than three trains per week with a maximum of 100 cars per train. Trains transiting the center must comply with speed limits of 5 mph on Jay Jay Bridge, 15 mph thru rail yards & populated areas and 25 mph in all other areas. The inclusion of a mid and long-term forecast of rail line operations will be needed to adequately analyze the potential impacts to KSC operations. Additionally, KSC will permit the transport of bulk and containerized cargo only. No hazardous materials will be permitted to travel through KSC property. This includes both solids and liquids. The EIS should analyze all forecast cargo types and their potential effects on the

environment as well as human health and safety. No passenger train operations will be permitted on KSC property.

For any proposed marshalling yards located on KSC property it will be necessary to coordinate the siting and location with the KSC Master Planning office. If there are new proposed marshalling yards located on KSC property these areas will need to be delineated and assessed for potential environmental impacts and consistency with the KSC Master Plan. Such areas should be identified and assessed as part of the alternatives considered in the EIS.

The EIS should evaluate the number of new road and pedestrian crossings that traverse the proposed and existing alignment both inside and outside of the KSC secure perimeter. This evaluation should include a detailed analysis of any potential impacts to the KSC workforce, operations and public use of the Merritt Island National Wildlife Refuge (MINWR) and the Canaveral National Seashore (CNS), and the use and operations of KARS Park.

The proposed rail project must operate in accordance with all applicable KSC, local, state and federal regulations. A comprehensive list of these regulations should be included in the EIS as well as a regulatory compliance analysis.

ALTERNATIVE ANALYSIS

We have reviewed the two alternative rail alignments that were presented as part of the public scoping meetings held November 18-19, 2014. Additionally, KSC personnel attended both the agency and public scoping meetings. Based on the feedback and public comment received at the scoping meetings KSC has determined that there is a strong desire by the general public to have a range of alternative alignments evaluated as part of the EIS.

The SR-528 corridor as intimated at both of the public scoping meetings should be analyzed as a potential alternative in the project proposal. In general this alignment would exit the port and follow the SR-528 corridor west crossing the Banana River and intersecting with the Florida East Coast rail line near US-1.

Additional consideration and alignment alternatives for the crossing of the Banana River should include a rail line that does not include the construction of a causeway in the eastern half of the river. The potential environmental effects of such a proposal could be extremely damaging to the sensitive aquatic habitats and the species that utilize them. It is not likely that KSC would support the concept of a causeway traversing the southern portion of the Banana River. For the segments of the proposed rail line that crosses the Banana River we suggest that a structural trestle be incorporated into all design alternatives.

In a combined review of the proposed rail line alternatives with Merritt Island National Wildlife Refuge (MINWR) and KSC there were concerns raised about habitat fragmentation within the segment of the proposed rail line that traverses the TEL-4 area. The maps that were presented at the public and agency scoping meetings seem to be somewhat inconsistent with previous alignments that were developed as part of the planning study conducted in early 2014. In general, we request that alternatives for the rail segment within the TEL-4 area be evaluated either as far to the east or west as practicable. Additionally, we request that an alternative be evaluated that crosses the Banana River and enters the TEL-4 area north of KARS Park. All of the proposed design alternatives would lessen the effects of habitat fragmentation within this area. Please see the attached map for further clarification.

KSC looks forward to working with you on this new endeavor. Please do not hesitate to contact me if you have any questions or need additional information. You can reach me at (321) 861-1196 or by email donald.j.dankert@nasa.gov.

Sincerely,

//original signed//

Don Dankert
Acting Lead KSC Environmental Planning

Enclosures:

Map

