

Surface Transportation Board

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Group's Address:	3535 Savannahs Trail		
		Phone Number:	
Group's City:	Merritt Island	Email Address:	
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Submitter's Comments

STB's Comments

Image Attachment(s)

An attachment has not been added.

EI-20812

Rec'd 12/18/14

Port Canaveral Rail Extension
Scoping Comments to Surface Transportation Board
Docket No. FD 35852

Submitted by Kathleen Helton, MBA, MSPM
12/16/14
3535 Savannahs Trail
Merritt Island, FL 32953

December 16, 2014

Mr. Dave Navecky
Surface Transportation Board
395 E Street, SW, Washington, D.C. 20423-0001
Attention: Environmental filing
Docket No. FD 35852

RE: Port Canaveral Rail Extension

Dear Mr. Navecky, et. al:

I am submitting comments in reference to the proposed Port Canaveral Rail Extension, and am in strong opposition to the proposed rail extension. The rail extension would have severe, devastating and quite possibly catastrophic impacts to the environment, community and economy of Merritt Island, surrounding areas, and the state of Florida. I hope that the information provided in this letter will serve to illustrate the negative impact of the proposed rail extension, as well as show that the Canaveral Port Authority (CPA) is primarily concerned with their own interests, and not the preservation of the ecological system, the environment, concerned citizens and/or area homeowners.

The environmental impact alone would be devastating to several species of wildlife in the Merritt Island Wildlife Refuge, Banana River, and Indian River, such as bald eagles, herons, ibis, spoonbills, mallards, alligators, dolphins, bobcat, otters, and deer, as well as endangered species including scrub jays, manatees and the Florida panther. These wildlife species were to be protected by the Merritt Island Refuge! For example, to protect the endangered manatees in the area, the U.S. Fish & Wildlife Service (USFWS) created a sanctuary in 1990 for manatees, which covers the majority of the KSC section of the Banana River. Water and air quality in the area would also be severely impacted, as well as increased risk of safety hazards to citizens living in the area, highly decreased home values, and increased noise levels.

People travel from all over the world to visit this area and its pristine environment for boating, fishing, hiking and wildlife viewing. In the past, NASA KSC has indicated that it is committed to stewardship of land and water resources in the area, and remains the single largest ecological preserve on the east coast of Florida. Along with the St. John's River Water Management District (SJRWMD) and the U.S. Fish and Wildlife Service, NASA has helped to implement many initiatives to increase and enhance fish and wildlife populations in the area and at NASA's Kennedy Space Center. This includes reduced discharges of domestic and industrial wastewater, creation of storm water management systems, remediation of past contamination sites, implementation of hazardous waste management systems, and creation of a culture of sustainability. Ongoing Ecological Program projects are directed at development of information and knowledge to address future KSC management questions, including the transition to a joint government and commercial launch facility, enhanced habitat management requirements for wetlands and scrub, potential impacts of emerging contaminants, and adaptation to climate change including elevated CO² and projected sea level rise over the next 50-75 years.

The rail line would also just be another way to negatively impact the area even further than the Space program already has. "Establishment of the space program at the Kennedy Space Center in the early 1960s led to explosive growth along the Indian River Lagoon, bringing prosperity but also negatively impacting water quality in the lagoon system... The Indian River Lagoon (IRL) watershed is an important economic and biological resource within Florida. More than 50 percent of the Florida east coast fish catch and historically 90 percent of Florida's clam harvest came from the basin (declining in recent years). The basin is also an important producer of Florida's Indian River citrus. Biological diversity is high, with more than 4,000 animal and plant species recorded, including 36 rare and endangered animal species... The large tracts of land needed for security and spaceport facilities resulted in the acquisition of 140,000 acres of beaches, dunes, flatwoods, wetlands, and marshes for the Merritt Island National Wildlife Refuge." ¹

On July 8, 2014, it was announced by the St. Johns River Water Management District that "The Board approved an agreement with the Florida Department of Environmental Protection (DEP) to receive \$10 million, appropriated by Florida Governor Rick Scott and the 2014 Legislature for the first phase of the Eau Gallie River Muck Dredging Project." As stated by Florida State House Representative Steve Crisafulli, "The Indian River Lagoon is a priceless resource to our communities and its ecological health is critical to the Space Coast economy and our quality of life. I'm proud to serve as a member of the Brevard legislative delegation which was responsible for securing this funding to restore the health and viability of our Indian River Lagoon." ²

In addition to the detrimental ecological impacts, the proposed rail line/berm/trestle will deeply impact flooding in the area, as the current access road (Hall Road) is prone to flooding. If excess water is pumped into the Indian River Lagoon, there would be impacts to homeowners in the area, and the area would then be considered a flood zone and residents would be required to pay for and maintain flood insurance. ³

The Canaveral Port Authority (CPA) employed TranSystems to perform a feasibility study to research other routes of connections to the Port. Five other routes for transport that had much less detrimental impact have been considered and discarded, yet two things *clearly* stood out - financial and self-interest benefits remain a top priority over wildlife and ecological preservation, environmental preservation, and concern for the safety and well-being of citizens and their homes.

One route that was considered includes the Canaveral Lock system. Why is this not a viable option for heavy cargo? The Canaveral Lock is the largest navigational lock in Florida, and was initially designed to permit passage of the huge Saturn rocket boosters during the Apollo program. In more current years, solid rocket boosters for the Shuttle program passed through the locks to NASA. ⁴

The State Road 528 route was also an option, with one eastward route parallel to Route 528, two lines through KSC and two lines through both Cape Canaveral Air Force Station (CCAF) and NASA KSC. CCAFS did not reject rail access but warned there may be limited service, delays at launch windows; extensive security and ARC issues to resolve, and overall, planners were not in

favor of routing rails through the Base. It was determined that the Air Force direction, while slightly more cost efficient, was far less desired and life cycle cost would “likely” be higher. The CEO of the Canaveral Port Authority stated to Congress in February 2014 that the Cape Canaveral Air Force Station was an option but “just not in their best interests.” Again, the key words in that statement are the words “THEIR best interests” – Not ecological or environmental; NOT “area citizens,” etc. – but “their” interests.

From all appearances, it seems that the Canaveral Port Authority (CPA) is *already* assuming that the NASA KSC rail extension is a “done deal,” but it has constraints and detrimental impacts that they have already acknowledged! As stated by the CPA, “Based on the work that it has already performed, CPA recognizes that the undeveloped portion of the KSC south of the industrial complex—where the new rail connection will be located—contains a number of environmental and physical constraints that would affect the alignment of the new rail connection. These constraints include at least one protected species, wetlands, sea grasses and setbacks from the radar installations.”⁵

Safety issues are also a concern. Rail accidents do occur, and as plans include transport of hazardous wastes, if an accident does occur, there not only would be large scale evacuations that would have to be implemented, but there is also the possibility of catastrophic loss of life. This is a HUGE risk. In addition, with global terrorism rampant, this system would be a prime target. How would a threat like that be mitigated and controlled? The simple and honest answer that no one will admit to is that it CAN’T be controlled, as there are several nearby public areas, neighborhoods, tourist locations, etc. People from all over the world visit this area. “If a 90-ton rail car loaded with chlorine were intentionally ruptured or detonated, it could kill or injure 100 people per second and be fatal to anyone within five miles. Within the first 30 minutes of such an event in a densely populated city... 100,000 people could be killed,” experts estimate.⁶ In addition, this rail extension opens up risks to national security and defense capabilities, and could cause national economic harm.

Of course, if a rail line is established as proposed, there will be deep impact to recreational activities that will have a negative impact on tourism in the area, as well as water-related activities (fishing, boating, paddling, kayaking, etc.) in the Indian River Lagoon (IRL), due to the 50 acres of the Banana River that would be filled in for a rail line berm/trestle. The IRL is a “complex association of terrestrial, wetland and estuarine ecosystems which combine to create a complex ecosystem mosaic with high habitat diversity.”⁷

The proposal cites creation of thousands of jobs (Blue collar? Professional? Doubled from 5,000 to 10,000?) and that there will be no more than four round trips per week. Everyone reading justifications like this should have a flashing red light going off in their head, as the creation of thousands of jobs for this project is all just conjecture, as well as the idea that there would be “four round trips per week.” How long would that be for? Who would monitor it? Who would monitor the speed of the train at only 10 mph? With 17 miles of rail at 10 mph, it would take a minimum of three hours to complete a trip. How do the projected number of “jobs” double, and are they blue collar or professional jobs? There are other considerations as well – if “thousands” of jobs ARE created, where will these people live? Where will their children go to school? What about traffic concerns in the area? With the influx of “thousands of jobs,” schools would

no doubt suddenly become overcrowded, etc., forcing taxpayers to pay for new schools and increasing taxes. Then, when the temporary construction project ends, people will then lose their jobs. These are just a few of the hundreds of questions, issues and risks that are involved. There are SO many other vague "arguments" that the Canaveral Port Authority has used to try and promote the proposal to the public and politically, but there is no substantiated evidence, and too many questions left unanswered that the CPA simply has no answers to and cannot provide.

In summary, the devastating impact of this proposal is evident. There are far too many impacts and negative repercussions of such a project on the area, surrounding communities and homeowners, state, and environment. The only benefit for completion of this project will be a great financial benefit to the Canaveral Port Authority. The fact that the CPA admitted environmental "constraints" (a word carefully chosen to somehow "soften" the blow to the environment and surrounding areas, as opposed to the word "impact") should be further evidence that this proposal should be denied and not be granted further consideration.

Respectfully,

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