



Marine Industry Concerns on AAF Draft EIS Must be Addressed

Issue: The Federal Railroad Administration's recently released Draft Environmental Impact Statement on the All Aboard Florida project (<https://www.fra.dot.gov/Page/P0672>) has understated the impact of bridge closures on the marine traffic on affected waterways and needs to be revised to address those concerns.

Overview: The marine industry is concerned directly regarding the opening and closure schedules of the bridges that cross three of the region's rivers, the New River in downtown Fort Lauderdale; the Loxahatchee River in Jupiter; and the St. Lucie River, Okeechobee Waterway, in Stuart.

Economics of South Florida: The marine industry is the backbone of the South Florida economy (tri-county area comprised of Broward, Dade, and Palm Beach counties) and a significant sector of Florida's economy. It represents:

- 136,465 jobs regionally in marine businesses.
- Over \$11.5 billion in gross output
- Nearly \$4.1 billion in wages and earnings.
- 75% of South Florida's recreational vessel repair facilities are upstream from the bridges to be used by AAF.
- Needless to say changes in bridge closures from current practice will directly affect the users of the waterways by making the channels under each bridge less available for vessel traffic. In essence the new operational schedule of the All Aboard Florida train will change the bridge operations by increasing the number of closures of the bridges and, consequently, the increased of the number of closures will result in a decrease in the time that a bridge will be open for this important industry. Thus, the Association is concerned that the waterways on which our membership and their customers rely will be less available to the detriment of this vital and growing industry.

Bridge Closure Impacts: The following factors can only be detrimental to the economics of this vital marine industry:

- Changes in bridge closures from current practice will directly affect the users of the waterways by making the channels under each bridge less available for vessel traffic; i.e., increasing the number of closures and, consequently, a decrease in the time that a bridge will be open for this important industry.
- Additional closures may result in bridge malfunctions that would result in extended closures and business disruption.
- Train schedule or operational disruptions may disrupt planned closures in an unpredictable.
 - Recently there have been numerous closures that were extensive and unscheduled causing serious disruptions in marine traffic on the affected waterways.

Specific Industry Concerns: Specific concerns of the industry regarding the effect of the increased rail traffic on our industry include:

- Increased closure time. We understood the goal was to keep the bridges in the open position a minimum of 40 minutes per hour. Now the proposed train schedule will keep it open only 30 minutes.
- Disruption of vessel traffic.
- Incompatibility with tide changes.
- Bridge failures and time of repair.
- Mobility of the industry and potential for stranded assets.
- Train schedule changes and resultant disruption to bridge closure schedule.

FRA Draft EIS is Inadequate: There was a complete failure to consult marine industry in preparing the DEIS. Thus, the Draft EIS exhibits a complete misunderstanding of what the marine industry is and completely missed the economic significance in the area affected by the proposed train operation.

- Completely understates the economic importance of the industry and the economic impact the All Aboard Florida train operations will have on it.
- Uses flawed economic measures and employment metrics.
- Little if any recognition of the multiplier effects (real estate, businesses, etc.).

- Fails to take into account the substantial and continuing dredging investments that federal, state and local authorities have made to facilitate this industry.
- Has not adequately addressed alternatives that could obviate the effects of the proposed train operations.
 - For example, if raised bridges were constructed, there would be no closures to hamper the vessel traffic on the affected waterways.
 - Inadequate consideration has been given to alternative routes to minimize impact on the waterways, i.e., shift the freight traffic to routes west of the affected navigable waters and urban areas.
 - Not adequately address the corridor capacity issues.
 - Future increase in train traffic will only make this worse and must be considered and addressed now.

Mitigation Measures Need to be Strengthened: Mitigation measures may minimize the impact that the train schedule could have. Those offered by All Aboard Florida are minimal and need to be expanded.

- Mitigation measures (including some of which have been suggested by AAF) should include:
 1. Addition of a tender at the New River Bridge to allow better communication with commercial vessels.
 2. Develop a schedule for the down times of the bridge for passenger rail service.
 3. Provide public access to the bridge closure schedules in an internet-accessible format.
 4. Schedules for each bridge may be posted on the AAF website and/or the USCG website. This will allow the boating community to plan their trips to avoid wait times and related costs associated with the Proposed Action.
 5. Implement a notification sign/signal/horn at each bridge location with countdowns to indicate the times at which the bridge will begin to close and open.
 6. Develop formal contact with first responders and emergency personnel.
 7. Develop coordination plans between AAF and local authorities during peak vessel travel times on holidays and major public events.

8. Develop coordination plans between AAF and the USCG to promote communication with the commercial and recreational boating communities.
 9. Manage train operations to minimize bridge closures.
 10. Set schedule of bridge closures.
 11. Publish bridge closure schedule to be readily available for waterway users (internet, notice to mariners, etc.).
 12. Fund a bridge tender with ability to communicate with waterway users.
 13. Prompt notification of bridge closure schedule changes.
 14. Signal and PTC upgrades.
 15. Penalties for unscheduled bridge closures.
 16. Stockpile spare parts to facilitate prompt repairs in the case of a bridge failure.
 17. Establish a fund to provide compensation for interruptions to waterway use, e.g. in the case of bridge failure.
 18. Establish and fund a citizens' advisory committee as a watchdog to oversee train operations and make recommendations to public officials.
 19. Provide for mooring for vessels forced to wait in the event of an unscheduled closure.
 20. Provide for response vessels to be able to render assistance to vessels in the waterway in the case of sudden or disruptive bridge closures.
 21. Determine future corridor capacity needs to evaluate potential impacts.
 22. Publish a periodic report on bridge closures and impact on waterways use, including projections on corridor capacity.
- All of these measures must be implemented so that the proposed train operations will minimize the negative impacts on the marine industry.

Revise the EIS: The marine industry urges the Federal Railroad Administration to revise the EIS and to include these measures in the final EIS.