U.S. Department
of Homeland Security

**United States
Coast Guard**

Commander
Seventh Coast Guard District

909 SE 1st Ave Rm 432
Miami, FL 33131-3050
Staff Symbol: (dpb)
Phone: (305) 415-6989
Fax: (305) 415-6763
Email: Evelyn.Smart@uscg.mil

16591/AAF
02 June 2014

Charlene Stroehlen PE
Senior Associate Engineer
AMEC - Environment & Infrastructure
404 SW 140th Terrace
Newberry, FL 32669

Dear Ms. Stroehlen:

In March 2014, the U.S. Coast Guard received a draft copy of the Navigation Discipline Report (NDR) for the AAF Passenger Rail Project from Orlando to Miami, Florida. The Coast Guard reviewed and provided comments on the NDR on April 4, 2014. Since then a revised advance copy of the NDR was given to the Coast Guard for a second review on May 8, 2014.

The Coast Guard agrees the revised NDR is more comprehensive than the first study and provides useful data on current use of three major waterways with drawbridges along the AAF corridor (New River in Broward County, Loxahatchee River in Palm Beach County, and the St. Lucie River in Martin County). In Sections 2.6.2 and 6.0, the NDR addresses evaluation criteria and a criteria matrix for assessing the No-Build Alternative and the Proposed Action's impact on identified navigation needs. While information on the impacts on navigation received from the applicant will be analyzed, the Coast Guard will make the ultimate determination as to whether or not the impacts on navigation are unreasonable.

The Coast Guard, in making a permit decision, must preserve the public right of navigation while maintaining a reasonable balance between competing land and waterborne transportation needs. We do so by taking a balanced approach to total transportation systems, both land and water modes, in all bridge actions. At this time, we are unable to fully assess the potential impacts and will require more information on the following issues prior to making a permit decision:

1. The impacts on navigation from the natural flow of these waterways, including currents and water velocity fluctuations, while vessels await openings at these drawbridges, remain unknown;

2. The affected drawbridges set the most restrictive vertical clearance on these waterways, and a large percentage of vessels cannot transit the bridges in the closed position;

3. Any increase in the existing closure periods at the drawbridges spanning these waterways may not provide for the reasonable needs of navigation;

4. The methodology used in the NDR may be sufficient to assess the waterways' trends and uses for purposes of making a navigation impact determination. However, the Coast

Guard is unfamiliar with the model and needs to evaluate the assumptions and data therein.

Accordingly, additional study will be required to determine the reasonable needs of navigation on these three waterways in the vicinity of the drawbridges. To advance the NEPA process, we support including the NDR as an attachment to the DEIS as it informs the choice of alternatives for analysis. The DEIS should note that the Coast Guard still must make a determination as to the prospective impacts on navigation in the vicinity of the three drawbridges spanning the New River in Broward County, Loxahatchee River in Palm Beach County, and the St. Lucie River in Martin County and that the DEIS will be used to inform that Coast Guard determination.

If the Coast Guard determines the proposed AAF operating schedule unreasonably impacts navigation on the New River, Loxahatchee River and St. Lucie rivers, it may be necessary for the Coast Guard to amend existing bridge regulations and require modifications to those bridge operations so that navigation is not unreasonably burdened.

(Miss) Evelyn Smart will continue to be the contact for your project.

Sincerely,

Barry L. Dragon
Director, District Bridge Program
Seventh Coast Guard District
By direction

Copy: Commander, Coast Guard Sector Miami (s, sp)
Commandant (CG-BRG), U.S. Coast Guard
Jose Gonzalez, FECI/AAF
Alex Gonzalez, FECI/AAF
Mr. Chris Bonanti, FECI/AAF