



**MARTIN COUNTY**  
**BOARD OF COUNTY COMMISSIONERS**  
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June 29, 2015

**DOUG SMITH**  
Commissioner, District 1

**ED FIELDING**  
Commissioner, District 2

**ANNE SCOTT**  
Commissioner, District 3

**SARAH HEARD**  
Commissioner, District 4

**JOHN HADDOX**  
Commissioner, District 5

Rear Admiral Scott A. Buschman, Commander  
United States Coast Guard District Seven  
Bridge Administration Branch  
Brickell Plaza Federal Building  
909 SE First Avenue  
Miami, Florida 33131-3050

**RE: Obstruction of Navigable Waterways – St. Lucie River**

Dear Rear Admiral Buschman:

Martin County has important new information to share about the number of vessels transiting the St. Lucie River at the Florida East Coast Railway Bascule Bridge. The bottom line is that the new data indicates there is far more vessel traffic than projected in the Draft Environmental Impact Statement (DEIS) for the All Aboard Florida (AAF) Passenger Rail Project. This new data indicates the expected increase in bridge closures is an even more serious problem, due to the larger number of vessels.

**Background**

On November 13, 2014, the Coast Guard held a public meeting at the Blake Library in Stuart, Florida to provide an opportunity for oral and written comments regarding current and future operations of the Florida East Coast Railroad Bridge across the St. Lucie River. The meeting was directed by Gene Stratton, Bridge Management Specialist of the Seventh Coast Guard District.

On November 19, 2014, the Martin County Board of County Commissioners submitted comments on Docket USCG-2014-0937. The comments included 81 days of boat count data from June 12, 2014 to August 31, 2014 at the St. Lucie River Railroad Bridge and a commitment to continue to collect data for a one year period. Martin County also committed to make the count data available to the Coast Guard for evaluation of the St. Lucie River Railroad Bridge's current navigation issues, and for future Rulemaking.

Further, in their November 2014 letter, the Martin County Board of County Commissioners also urged the Coast Guard to immediately initiate the

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Rulemaking Process on the St. Lucie River Railroad Bridge to establish predictable hourly opening times with minimum safe vessel transit times. The proposed AAF Passenger Rail Project will create additional impacts on a bridge that is already an unreasonable obstruction to navigation. A similar request was made by the community group Citizens Against Rail Expansion in Florida (CARE FL), following the research and analysis performed for CARE by retired U.S. Coast Guard Captain and U.S. federal Senior Executive Service maritime navigation authority, Mr. Dana Goward.

### **Taylor Engineering:**

With respect to vessel traffic at the St. Lucie River Railroad Bridge, the attached report from Taylor Engineering, Inc. includes eleven (11) months of data collected from June 12, 2014, to April 30, 2015. Peak travel hours are from 10 AM to 5 PM, however substantial additional boat traffic is seen between 6 AM and 8 PM daily. Boat counts in the report reflect traffic during daylight hours only and therefore under count the total boat traffic.

### **The DEIS:**

The Navigation Discipline Report included in the DEIS utilized vessel traffic data extracted from “peak vessel traffic season”—a two-week video assessment of the St. Lucie River Bridge, from January 3, 2014, to January 17, 2014. Page 4-21 of the DEIS states:

“The vessel traffic data show an average of 102 vessel crossings per day (Min=28; Max=263) from Monday to Friday, compared to about 315 vessels (Min=157; Max=413) per day on a weekend. Sundays had the most vessel activity, with a range of 296 to 395 vessel counts.”

Table 4.1.3-2, Daily Vessel Traffic at the St. Lucie, Loxahatchee, and New River Bridges, January 2014 on Page 4-22 of the DEIS states :

“Vessel traffic was assessed during January daylight hours, from 6:00 am to 6:30 pm.”

Table 4.3-6 on Page 4-22 of the Navigation Discipline Report for the AAF Passenger Rail Project from Orlando to Miami, Florida in Appendix 4.1.3-C of the DEIS states:

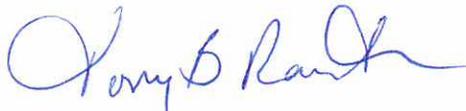
“Vessel traffic was assessed primarily during daylight hours (from 6:00am to 6:30pm), but casual observations were also recorded later at night.”

**Comparison:**

The DEIS is misleading in terms of 1) what the “peak vessel traffic season” is for Martin County, 2) what the average daily boat count is in those “peak” months, and 3) what the average boat count is on weekends. First, the DEIS collected data in January 2014, which indicates that the winter months are the “peak vessel traffic season,” while the data collected by Taylor Engineering shows that the “peak vessel traffic season” for Martin County is the spring and summer months, with April boat counts 83% higher than January counts. Second, the DEIS shows the average daily boat count, from January 3, 2014 to January 17, 2014, to be 121 boats per day, while data collected from Taylor Engineering shows the average daylight boat count in the month of April 2015 to be 280.9 boats per day. Third, the DEIS shows that Sunday has the highest daily count, with an average ranging between 296 and 395 boats. Taylor Engineering shows the highest daily count to occur on Sunday as well, but with an average of 420.3 boats per day, with the highest actual count on a Sunday of 880 boats. This is a significant fact, assuming that the highest number of riders on the passenger rail would likely be the weekends. This information is yet another indication that the flawed DEIS does not provide an accurate depiction of the negative impacts that AAF will have on Martin County.

Martin County will continue to collect boat count data and share it with the Coast Guard through August 2015. Please keep us informed on any actions the Coast Guard initiates on correcting the current navigation issues at the St. Lucie River Railroad Bridge.

Sincerely,



Terry B. Rauth, P.E.  
Deputy Director of Engineering

Enclosures: Vessel Traffic Data, Taylor Engineering, Inc.

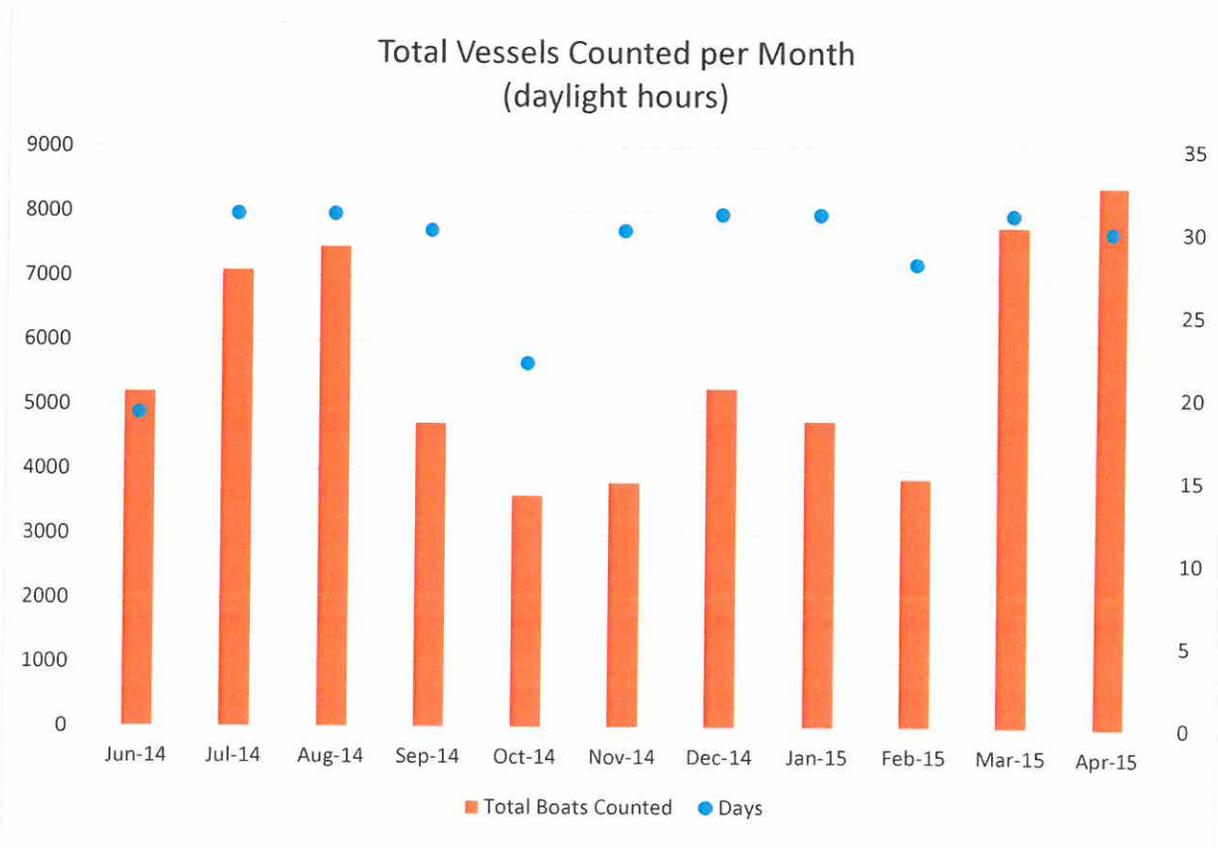
CC: Martin County Board of County Commissioners  
Michael Durham, Martin County Attorney  
Stephen M. Ryan, Martin County Legal Counsel  
John Winkle, Federal Railroad Administration  
Osvaldo Collazo, U.S. Army Corps of Engineer  
Barry Dragon, USCG Chief, Bridge Branch



## Summary Statistics

The summary statistics presented below cover the period from **June 12, 2014** to **April 30, 2015**. All data represent daylight hours only. During this period reviewers counted 62,006 boats.

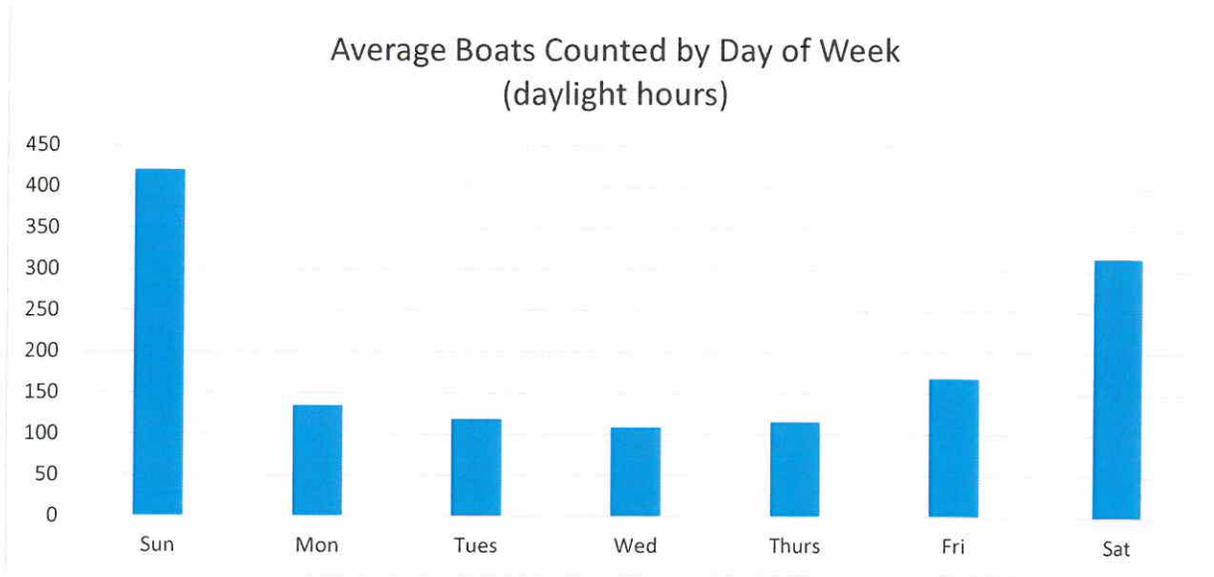
Month	Days	Total Boats Counted	Average Boats per Day
Jun-14	19	5,204	273.9
Jul-14	31	7,091	228.7
Aug-14	31	7,461	240.7
Sep-14	30	4,731	157.7
Oct-14	22	3,604	163.8
Nov-14	30	3,806	126.9
Dec-14	31	5,265	169.8
Jan-15	31	4,760	153.5
Feb-15	28	3,867	138.1
Mar-15	31	7,789	251.3
Apr-15	30	<u>8,428</u>	280.9
		<b>62,006</b>	



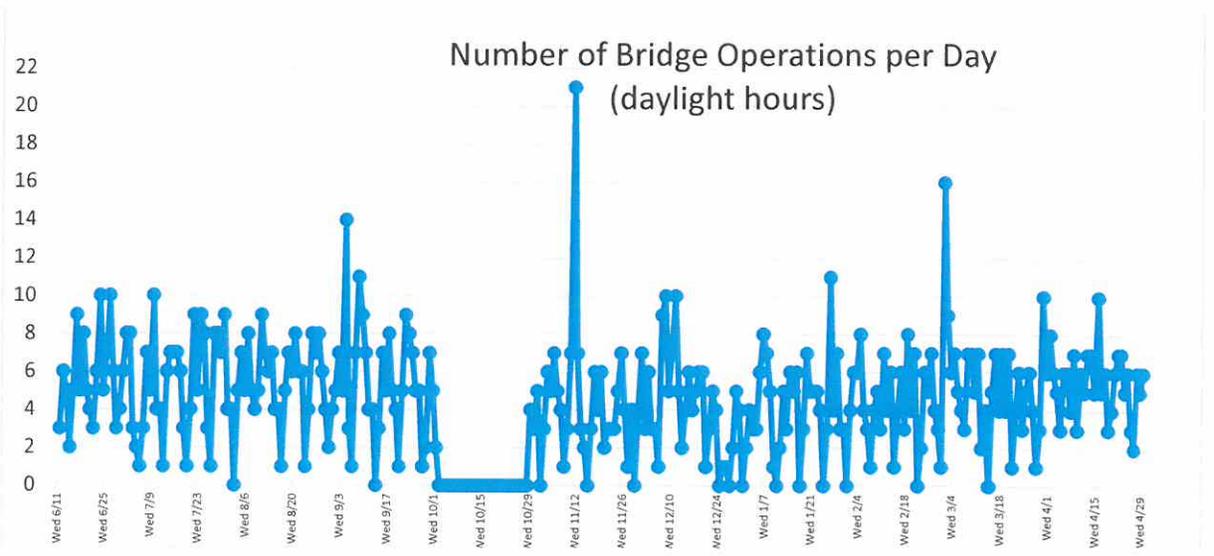


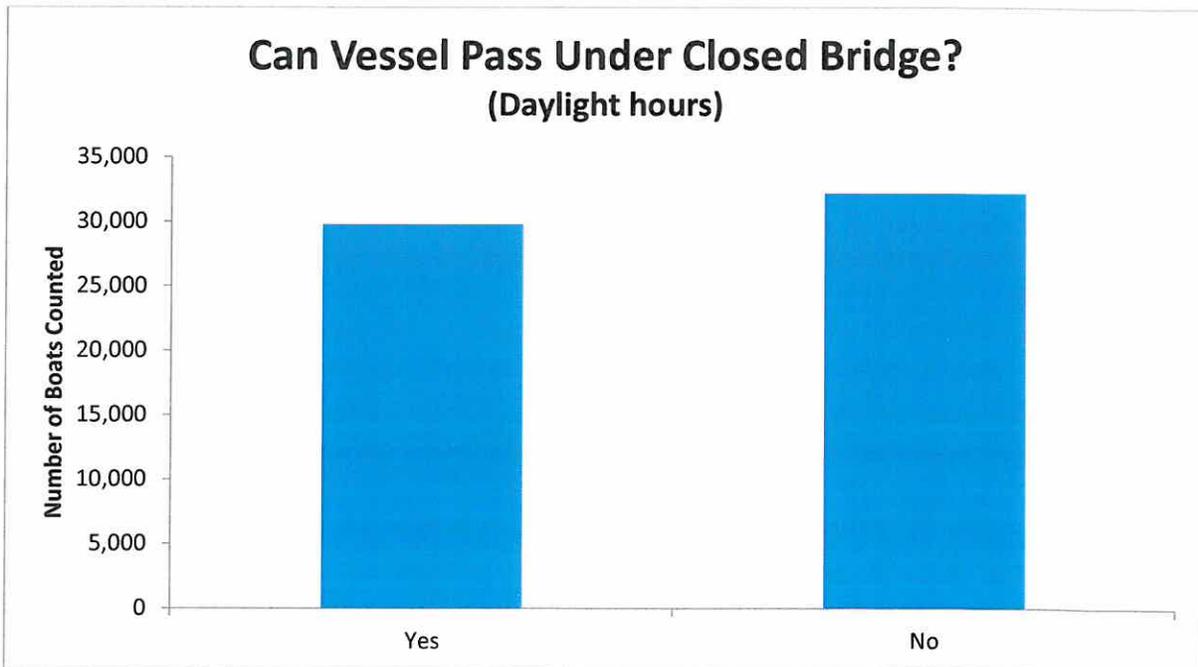
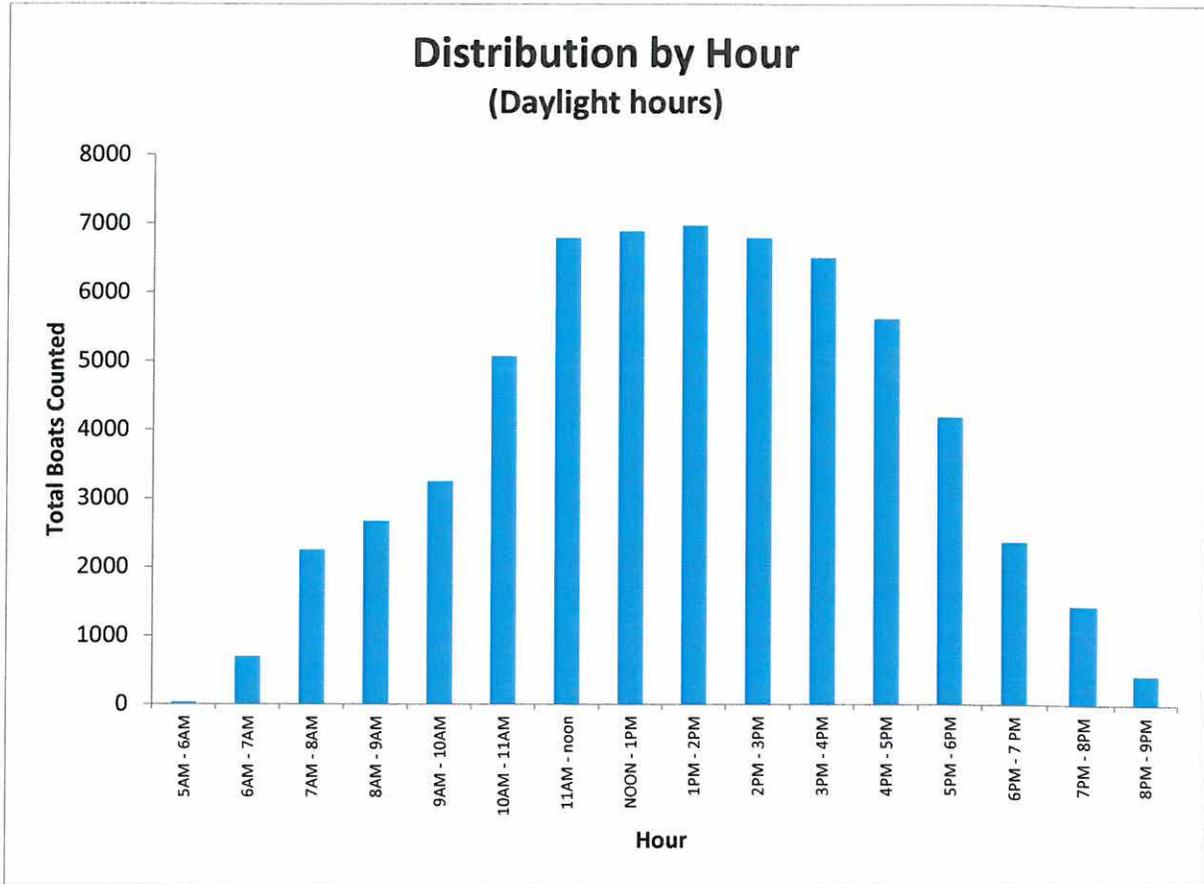
Day of Week	Total Boats Counted	Count	Average Boats Counted
Sun	18,915	45	420.3
Mon	6,053	45	134.5
Tues	5,212	44	118.5
Wed	4,763	44	108.3
Thurs	5,299	46	115.2
Fri	7,570	45	168.2
Sat	<u>14,194</u>	45	315.4
	62,006		

Average Boats Counted by Day of Week (daylight hours)



Number of Bridge Operations per Day (daylight hours)





**ST. LUCIE RIVER FEC RAILROAD BRIDGE  
HIGHEST DAILY COUNTS – JUNE 12, 2014 to APRIL 30, 2015**

TOP 10 HIGHEST COUNTS IN RECORD* FOR EACH DAY OF THE WEEK													
Monday		Tuesday		Wednesday		Thursday		Friday		Saturday		Sunday	
9/1/2014	538	3/17/2015	287	3/18/2015	326	3/19/2015	227	7/4/2014	752	4/4/2015	736	8/31/2014	880
2/23/2015	264	12/30/2014	283	4/1/2015	234	1/1/2015	217	3/20/2015	390	6/28/2014	626	3/22/2015	770
3/30/2015	233	3/31/2015	245	1/21/2015	212	4/2/2015	216	4/3/2015	387	3/21/2015	594	6/22/2014	725
12/29/2014	224	4/7/2015	200	2/25/2015	181	7/3/2014	206	1/2/2015	249	4/25/2015	590	3/15/2015	715
3/2/2015	211	12/23/2014	184	4/15/2015	172	1/22/2015	200	6/27/2014	243	7/19/2014	536	4/19/2015	671
4/6/2015	200	2/24/2015	183	4/8/2015	171	3/12/2015	199	4/24/2015	242	8/23/2014	518	6/29/2014	664
3/16/2015	197	3/24/2015	170	7/30/2014	169	4/9/2015	190	4/10/2015	240	4/18/2015	506	6/15/2014	643
3/9/2015	189	4/14/2015	167	3/4/2015	163	4/16/2015	172	7/11/2014	224	7/5/2014	499	8/10/2014	606
2/9/2015	182	1/6/2015	166	3/25/2015	163	7/24/2014	160	7/25/2014	220	4/11/2015	495	4/26/2015	602
1/19/2015	172	6/24/2014	161	4/22/2015	155	11/13/2014	158	7/18/2014	212	7/12/2014	461	8/24/2014	595

\* June 12, 2014 to April 30, 2015



**ST. LUCIE RIVER FEC RAILROAD BRIDGE  
HIGHEST DAILY COUNTS – JUNE 12, 2014 to APRIL 30, 2015**

<b>TOP 20 HIGHEST DAILY COUNTS IN RECORD*</b>			
<b>Rank</b>	<b>Date</b>	<b>Day of Week</b>	<b>Count</b>
1	8/31/2014	Sunday	880
2	3/22/2015	Sunday	770
3	7/4/2014	Friday	752
4	4/4/2015	Saturday	736
5	6/22/2014	Sunday	725
6	3/15/2015	Sunday	715
7	4/19/2015	Sunday	671
8	6/29/2014	Sunday	664
9	6/15/2014	Sunday	643
10	6/28/2014	Saturday	626
11	8/10/2014	Sunday	606
12	4/26/2015	Sunday	602
13	8/24/2014	Sunday	595
14	3/21/2015	Saturday	594
15	4/25/2015	Saturday	590
16	12/28/2014	Sunday	574
17	8/17/2014	Sunday	571
18	9/1/2014	Monday	538
19	7/19/2014	Saturday	536
20	7/27/2014	Sunday	532

\* Period of record from June 12, 2014 to April 30, 2015