Date: December 1, 2014

To: Lauren Milligan, Florida State Clearinghouse Coordinator
Florida Department of Environmental Protection

From: Martin Markovich, Senior Economic Analyst
Florida Department of Transportation, Office of Policy Planning

Re: U.S. Department of Transportation, Federal Railroad Administration Draft Environmental Impact Statement and Section 4(f) Evaluation for the All Aboard Florida Intercity Passenger Rail Project – Orlando to Miami, Florida

The Florida Department of Transportation ("Department") has reviewed the Draft Environmental Impact Statement and Section 4(f) Evaluation ("DEIS") issued by the U.S. Department of Transportation, Federal Railroad Administration ("FRA") for the All Aboard Florida Intercity Passenger Rail Project – Orlando to Miami, Florida ("AAF"). The affected Department Districts and respective counties are: District 4 (Broward, Palm Beach, Martin, St. Lucie, and Indian River), District 5 (Brevard and Orange) and District 6 (Miami-Dade). The Department offers the following comments to the DEIS:

1. Additional comprehensive traffic impact studies and capacity / delay modeling and analysis are recommended. (Page S-8 / Transportation)

2. Traffic impacts resulting from freight diversion (negative and positive) impact support documentation recommended. (Page S-8 / Transportation)

3. Additional detail on the traffic congestion impacts along the N-S corridor is recommended. (Page S-9 / Transportation)

4. Additional analysis and documentation on the impacts that the greater frequency of trains will have on the increased opportunities for conflict between trains and vehicles or people is recommended in the DEIS. (Page S-17 / Freight Impacts)

5. Table S-2 should include more details and references for potential negative impacts along with project benefits. (Page S-22 / Comparing Alternatives)
6. Intuitively, it does not seem the average train speed is twice as fast (59.4 vs 28.5 mph) in Palm Beach County compared to all other counties. (Page 2-2 / Table 2.1)

7. Describe the rail capacity analysis that was performed to verify that the Build alternative would have a beneficial impact on existing freight traffic. (Page 4-1)

8. It is not indicated if new track construction will be performed in a manner that would maintain rail operations. (Page 4-2)

9. The Department recommends that a vehicle queuing analysis and comparison to available storage length between crossings and adjacent signalized intersections to identify locations where a propensity for vehicles stopping on the tracks is present.

10. While the proposed rail construction will be located within railroad right of way, the project will intersect and impact state roads at a number of railroad crossings. The DEIS should evaluate and account for additional AAF costs necessary to achieve a compatible design transition as the rail crossing surface transitions to the adjacent connecting roadway and document all AAF associated costs for design and construction. This request is based on observations made on prior crossing upgrades in which surfaces were not compatible and resulted in additional costs to the public to improve the interface between the rail and roadway components.

11. As described in the DEIS, AAF will be responsible for obtaining all environmental permits and clearances and easements required under the National Environmental Policy Act (“NEPA”) and various federal, state and local laws and regulations. If there are any environmental permitting or mitigation questions, please contact the Florida Department of Transportation Central Office Environmental Management Office at (850) 414-4447.

12. Operation of overweight/over-dimensional vehicles by AAF on the Department’s right-of-way will be subject to the requirements of Sections 316.550 and 316.535, Florida Statutes, and Rule Chapter 14-26, Safety Regulations and Permitting Fees for Overweight and Over-dimensional Vehicles, Florida Administrative Code.

Overweight/over-dimensional Permits are handled by FDOT Central Office. Additional information regarding those permits can be found at: https://www3.dot.state.fl.us/OneStopPermitting/Permits.aspx/OverweightOverdimensionalPermits.

13. If any hazardous materials will need to be transported on Department roads, a hazardous spills response plan will need to be prepared and coordination with the Department will be required.
14. It is anticipated that construction of railroad improvements will require railroad crossing closures that create impacts to the roadway network, including pedestrians and bicyclists. The temporary closures and/or lane reductions on the State Highway System will require the permitting of Maintenance of Traffic (MOT) Plans by the Department to mitigate for these impacts by safely redirecting, detouring and channelizing vehicles and pedestrians around the roadway closures required by the track and crossing upgrades. This can be accomplished through the affected Department District Operations Centers.

It is important that any MOT submitted to the Department conform to the most current edition of the Department’s Design Standards and the most current edition of the Department’s Standard Specifications for Road and Bridge Construction. These requirements include the Department’s Design Standard Index (600 series) and the most current edition of the Manual on Uniform Traffic Control Devices (MUTCD). Special attention should be given to Department Design Standard Index 611, 612, 613, and 660.