



May 10, 2013

Catherine Dobbs  
Transportation Industry Analyst  
Office of Railroad Policy and Development  
Federal Railroad Administration  
1200 New Jersey Avenue, SE,  
Washington, DC 20590

Reference: All Aboard Florida EIS Comment

Dear Ms. Dobbs,

The Marine Industries Association of South Florida is a 500 member, not-for profit, trade association established in 1961 to serve the interests of the recreational marine industry in South Florida. Our mandate is the advancement of the recreational marine industry through promotion, professionalism and advocacy.

The New River FEC Railroad Bridge has significant impact upon the recreational marine industry in Broward County, which is estimated to provide a \$7.4 billion annual economic impact and 92,000 jobs to the local economy. The New River provides the only access channel to key marinas and repair facilities that make up the heart of the recreational marine industry in South Florida. The data contained in the 2009 South Florida East Coast Corridor Transit Analysis Study: Phase 2 Navigable Waterway Analysis and Technical Memorandum confirms the significant vessel traffic that navigates daily through the bridge.

One area of particular concern, also confirmed by the 2009 study, is that the current rail traffic already results in a blockage of navigation along the New River for as long as six hours per day. Our concern is that the additional proposed rail traffic of 32 passenger trains per day, combined with the planned increased freight traffic generated by the new intermodal in Miami, as well as the on-dock transfer station in Port Everglades, will combine to create the cumulative effect of virtually closing navigational access to the New River.

A second area of concern is compliance with the Code of Federal Regulations, Title 33: Navigation and Navigable Waters. These regulations apply to the current and future navigation of the New River. Specifically, Part 117 of Title 33 relates to Drawbridge Operation Regulations and section 117.31 relates to the "operation of draw for emergency situations." We do not have reasonable assurance that the future operation of the New River FEC Railroad Bridge will be in compliance with these regulations and, in fact, we are concerned that compliance may be impossible as currently operationally contemplated. Regulatory compliance is a particularly complicated issue as the Broward County Hurricane Plan also requires that all New River bridges follow certain operational guidelines in a threatening storm condition and the role of passenger rail in such a condition has yet to be defined.

These concerns resulted in our conclusion that further definition of the operational policies and estimation of future railway traffic is required. Once defined, in compliance with regulatory requirements, we recommend that an economic impact assessment be made of the project based upon the actual operating plan. On behalf of the Marine Industries Association of South Florida, you have our commitment to assist in providing any information or assistance that you may require in your investigation.

Sincerely,

A handwritten signature in black ink, reading "Kristina Hebert". The signature is written in a cursive style with a large initial "K".

Kristina Hebert  
President  
Marine Industries Association of South Florida