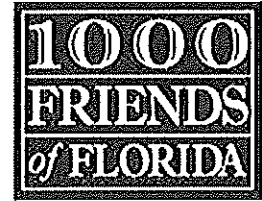
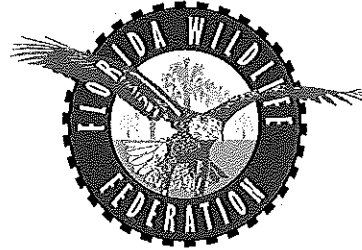




August 16, 2011

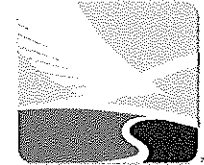
The Honorable Rick Scott, Governor
State of Florida, The Capitol
400 S. Monroe St.
Tallahassee, FL 32399-0001



Ananth Prasad, P.E., Secretary
Department of Transportation
605 Suwannee Street
Tallahassee, Florida 32399-0450



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CONSERVANCY
of Southwest Florida
OUR WATER, LAND, WILDLIFE, FUTURE.

RE: Florida Transportation Vision for the 21st Century

Dear Governor Scott and Secretary Prasad:

The above organizations asked me to present several recommendations and points of concern as the transportation “vision” process takes shape over the coming months. FDOT Secretary Prasad, during recent remarks said that DOT plans to revive work on its “Future Corridors Plan” that was previously presented prior to the economic collapse in 2008. The Secretary also said Florida will be down-playing local decision-making on transportation projects in favor of regional decision-making and implementing a policy that new capacity on interstates and expressways and widening and replacement of all major river crossings should be funded through tolls (or at least tolls as complements to traditional funding). For the record, the undersigned organizations believe that expanding the capacity of existing major interstates and expressways (including multi-modal options) and the replacement of aging infrastructure (such as outdated bridge structures) should constitute the highest transportation priority of the state with regard to highways. Improving roads “where the people are” and thereby facilitating the intensification of growth and expanding employment opportunities through economic development in our existing developed areas is in our view the highest and best use of transportation dollars.

Most of these organizations commented previously with significant concerns when the FDOT Future Corridors Action Plan was initially presented. Of critical importance were issues in the planning and development of these new corridors, such as:

- Consideration of the need and benefits of such projects in the context of an overall regional and statewide growth vision plan(s) before any new or extended corridors are designated;
- The costs and economic feasibility of the proposed infrastructure development without additional public subsidy [e.g., the proposed Manatee County to St. Lucie County (East-West Heartland Parkway) did not meet toll-road payback economic feasibility test even during good economic times under optimistic BEBR population projections];

- The enduring environmental impacts that the placement of new road corridors create, affect and shape such as fostering new development on lands along the corridor irrespective of suitability [including a wide diversity of impacts such as hydrological alterations, wildlife impacts, including habitat loss, fragmentation, degradation, and increasing land management challenges (e.g., within the dwindling Florida panther and bear habitat areas and lands tributary to the Everglades), impacts to publicly owned conservation land and increased risk of harm to people and property from flooding resulting from new communities in floodable areas].
- The cost-benefit analysis of funding new roadway corridors versus directing funds to improve existing transportation corridors, especially in urban areas where roads are operating at an unacceptable level of service and creating a safety concern.

The current economy requires careful consideration of regional governance, job creation and financial feasibility in order to plan and initiate needed economic growth. Nevertheless, we want to emphasize that a number of the proposed corridor projects will significantly affect our past (and likely future) public investments in Florida's natural lands and habitats. These investments purposely built a high-value green infrastructure portfolio of rural and natural lands, wildlife habitats and necessary ecosystem services to serve Florida's current and future generations. These investments conserve the valued essentials of Florida and directly link to the desirability of our state. One of the concerns expressed in 2006 regarding the proposed future corridors was that their development would accelerate development of environmentally sensitive lands slated for preservation as well as impacting existing publicly preserved lands, as the corridors were not designated with sensitivity to avoiding and minimizing impacts to important conservation areas.

Any Florida road corridor vision needs to be planned and implemented in coordination with robust land use and conservation priorities. In this regard, we believe no formal consideration of a corridor should take place outside of the context of an integrated regional vision (such as the My Region Plan of Central Florida and the upper Kissimmee River Northern Everglades planning currently under development). Without that type of approach, we will repeat the process that resulted in current backlogs, congestion and unsustainable economic and environmental land use patterns.

Much of the justification for the 2006 Action Plan was based on then available population projections. Accommodating an average of 900 people/day through the year 2035 looked likely until the economic crash. The current economic downturn has changed everything. The 2006 numbers and trip projections need significant re-examination, especially in view of the policy change to rely more heavily on toll income to cover the infrastructure development and management costs. We question current economic feasibility of many of these proposed road projects given that previous financial analyses showed that toll revenues were simply inadequate. The anticipated growth patterns of the past which drove the 2006 Corridors Plan may not be at all relevant to Florida's future. There is much to suggest that job creating businesses considering

Florida want the “sure thing” advantages of proximity to existing urban centers and intermodal transportation networks rather than more speculative anticipation of possible future urban nodes promising “Greenfield” sites far from existing pools of employees. Florida’s scarce transportation dollars need to carefully target “where the people are”, and “where the jobs are going to be”. The concept of “drive until you qualify suburbia” which dominated land use patterns over the last 50 years is almost certainly a thing of the past.

The Livability and Environmental Stewardship criteria in the 2006 Action Plan never suggest that consistency with local comprehensive plans is a consideration. We are concerned that under that plan, corridors could be justified on mobility and connectedness criteria alone, with community and environmental factors subordinate, implying that a simple tweaking of the location of a corridor can address major problems. If factors of consistency with local comprehensive plans are not taken into consideration, we fear results that will mean more poorly-placed development, environmental damage, sprawl, and higher costs for taxpayers forced to cover the cost of correcting or living within the outcomes of such mistakes. A more regional orientation is called for in selecting which new roads to build, and local community input and directives should be respected in adopted local comprehensive plans. Again, we suggest it may be through regional/inter-regional planning actions that important local issues can be vetted and addressed prior to any corridor selection.

There seems to be an inordinate reliance on roadway options with limited guidance being offered to help grow alternative modes of travel between regions of the state. We recognize there are valid rationales for some new inter-regional transportation connections, but trust that the vision being offered is not to see new highways interlaced across Florida without careful weighing of outcomes such as more costly sprawl, damaged ecosystems and inordinate payback and management costs. Expanding opportunities for regional and statewide travel using rail or air transit in close coordination with strategically chosen road and port projects can help the state grow, provide jobs, and encourage travel options and land development opportunities without repeating and adding to the negative impacts of the past.

In addition, the Department of Transportation’s planning initiatives should emphasize improvements to existing transportation corridors. Many current roadways are functioning at an unacceptable level of service. These roads already go through existing communities where urban infrastructure and services are available. Prioritization of transportation infrastructure improvements should be to improving existing transportation corridors that service existing communities rather than toward creating new corridors that primarily serve to spur new development in areas without the ancillary infrastructure to support it. New corridors cannot be justified and considered in the public’s best interest when existing infrastructure corridors are failing.

We are somewhat puzzled by the lack of emphasis on the rapid construction of a road which by all accounts represents Florida’s strongest economic and environmental consensus on concerning

future needed highway construction. The Wekiva Parkway in Orange, Lake, and Seminole Counties is nearly complete in its design, and has the strong support of all the undersigned organizations, as well as political and economic leaders in Orange, Lake and Seminole Counties. While the recent statement by Secretary Prasad includes a brief reference to a small part of this vitally needed roadway to complete the beltway around Orlando, the statement almost seems to downplay the overall project. There are tens of thousands of jobs to be gained immediately by starting construction on the entire Wekiva Parkway project. There is also an important environmental advantage, and the prospect of spurring well planned economic development in conjunction with the roadway. We consider this roadway, and the process that led to the consensus on building it to be a model, and hope that the state will give it greater support resulting in prompt action to begin construction.

Finally, we suggest that the better path forward is the use of the 2060 Florida Transportation Plan. As it states, "Transportation decisions should reflect community characteristics and values with a strong emphasis on engaging citizens in shaping these future choices. Transportation decisions should be made in the context of broader community, regional and state visions and coordination with other public and private investments and plans."

The natural features that make us such an attractive state have been heavily impacted by past, uncoordinated transportation decisions. We pledge to work with you to see that this does not happen again so that our citizens, communities and Florida's natural systems can prosper.

Sincerely,



Charles G. Pattison, FAICP
President of 1000 Friends of Florida

Rudy Scheffer, Chair
Sierra Club Florida Steering Committee

Andrew McElwaine, President & CEO
Conservancy of Southwest Florida

Charles Lee, Director of Advocacy
Audubon of Florida

Manley Fuller, President
Florida Wildlife Federation

Laurie A. Macdonald, Florida Program Director
Defenders of Wildlife