

October 13, 2020

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Florida Department of Transportation
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Via online portal and FDOT.Listens@dot.state.fl.us

RE: Joint Comments regarding Central-Southwest, Northern Turnpike, and Suncoast Connector Corridor Draft Task Force Reports (M-CORES)

Secretary Thibault:

SB 7068 and section 338.223, Florida Statutes, charge each of the Task Forces to evaluate their respective Multi-use Corridors of Regional Economic Significance (M-CORES) Program corridors. The Florida Department of Transportation (FDOT), and the respective Task Forces, ultimately failed to provide comprehensive forecasts for future population, environmental and land use impacts, employment, traffic, and usage rates at the level of detail needed to warrant the continuation of the M-CORES program.

The work that FDOT failed to share with Task Force members was taken on by outside analysts. Using FDOT's "economically feasible" framework and 500 simulated model trials, Cornell Consulting's financial underwriting analysis (see [here](#)) found all of the M-CORES connectors to be financially infeasible.

Cornell Consulting estimated construction alone to be \$10.3 billion for the three new toll roads. Meanwhile, in assessing the economic impact of toll roads, they found that the average rate of return for highways today are diminishing compared to early periods and are simply not worth the cost.

FDOT has not provided reliable robust traffic information to validate the need for these proposed toll roads through rural Florida that would address problems the existing FDOT work plan is not already aiming to solve. FDOT claims that increasing road capacity will reduce congestion are unfounded; in fact, examples abound from Florida and elsewhere of additional or widened highways leading to more rather than less congestion.

Broadband is a necessary utility that does not depend on the construction of new roads. In assessing broadband deployment, Cornell Consulting identified aerial fiber optic cable installation as a more efficient method of connecting underserved communities within the M-CORES study areas. Their projections saw that aerial fiber optic cable installation could be achieved for a fraction of the cost.

While hurricane preparedness is necessary, the Florida Division of Emergency Management states on its website: "Select an evacuation destination that is nearest to your home, preferably in the same county, or at least minimize the distance over which you must travel in order to reach your intended shelter location." Encouraging Floridians to attempt to outrun a hurricane is contrary advice. It has been over ten (10) years since a comprehensive statewide hurricane evacuation plan has been completed; a

prerequisite before any new roads are proposed with the stated purpose of aiding in hurricane evacuation. Any funding for broadband deployment or hurricane preparedness now part of the M-CORES budget should instead, through legislative action, be directed to the local governments or state agencies actually tasked with providing those services. Providing these services should not be tied to the development of new roads, as suggested in FDOT's definition of "no build."

In order for the goal of restoring and protecting Florida's beleaguered water resources, including its springs, lakes, rivers, bays, and the Everglades to be achieved, it is imperative that no road project directly or indirectly impede or otherwise impact current or future restoration activities. Florida's state waters are in crisis already.

The locations of all three M-CORES corridors are contrary to the protection and acquisition of state conservation lands critical to the preservation of the state's remaining wild lands, for the people who explore them and the wildlife that depends upon them. Highways fragment wildlife habitat and collisions with vehicles are among the top causes of wildlife mortality. The science is clear regarding the endangered Florida Panther – additional fragmentation of remaining habitat will imperil their existence. On the other hand, protecting umbrella species like the panther and the Florida Black Bear will thereby protect other listed and non-listed species as well.

These proposed corridor study areas encompass huge swaths of Florida's agricultural land base. These ranchlands are indispensable to maintaining connectivity among existing conservation lands, many of which have been proposed for protection as approved Florida Forever projects and/or Rural and Family Lands projects. Agriculture's contribution to Florida's economy is second only to tourism and is at risk from these proposed corridors.

Floridians deserve the choice to enjoy the quality of life and natural beauty afforded in rural communities. Rural Florida residents and local governments are rightly concerned about the impact of toll roads on existing local businesses and their iconic way of life. History has shown that toll roads will either bypass historic downtowns altogether or replace them with mega gas-stations, fast food chains, and sprawl. Nothing in the reports, or in recent Florida history, provides any assurances that these fears are not warranted.

Any transportation capacity, operational or safety deficiencies within the state's transportation system should first be met by improvements to existing transportation corridors. This is reflected in the draft task force reports, all of which express a preference for improvement or expansion of existing roadways and consideration of a "no build" option for the proposed M-CORES corridors.

The COVID-19 pandemic has underscored the need to prioritize human health and welfare in Florida; the priority should be responding to critical state needs resulting from the COVID-19 pandemic. Siphoning billions of dollars from the state budget and directing FDOT to study and build these toll roads has already taken resources away from legitimate, identified state projects and must be stopped before more tax dollars are wasted. A delay of a "no build" decision until the Project Development and Environment (PD&E) study phase and continued funding of the M-CORES program would be an astronomical waste of taxpayer dollars, and contrary to the wishes of an overwhelming majority of Floridians. M-CORES would dramatically strain the state budget while Florida is facing massive

revenue shortfalls. We have already witnessed this: Governor DeSantis vetoed \$1 billion from the state budget – including \$83 million for critical water quality projects – while the M-CORES project budget was increased.

SB 7068 in no way requires that any new toll road be built for any segment, let alone all segments of the three study areas. FDOT's normal systematic approach to planning for the state's transportation future had not, prior to the passage of SB 7068, identified a factual, objective specific transportation problem to be solved by any of these roads. The M-CORES process, a failed attempt to bypass the state's normal transportation planning process, has neither evaluated nor identified any such factual, objective specific transportation problem to be solved.

In order to protect Florida's taxpayers, environmental assets and resources, and preserve areas providing habitat for plants and wildlife, rural lands, the agriculture industry, and the quality of life of our citizens, the only reasonable outcome of the three task force processes is a clear "no build" recommendation.

Respectfully submitted,

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