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VIA EMAIL

October 23, 2020

Kevin J. Thibault, P.E.
Secretary
Florida Department of Transportation
605 Suwannee Street
Tallahassee, FL 32399-0450

RE: M-CORES Task Force Reports – NO SUPPORT

Dear Secretary Thibault:

We appreciate your giving us the opportunity to participate on the three M-CORES task forces. Our representatives have taken that responsibility very seriously, actively participating in the meetings, submitting numerous comments and raising concerns throughout the process. But as expressed by each of the representatives at their final task force meetings, the final reports fail to address 1000 Friends' priority recommendations related to preventing sprawl.

For this reason, we would like 1000 Friends of Florida's opposition formally included in each of the three task force reports that are to be submitted to the Governor and Legislature on November 15, and the word "consensus" removed from the term "consensus recommendations" wherever it appears for the reasons discussed more fully below.

As you know, we advocated strongly against SB 7068 when it was before the Florida Legislature in 2019. Our leadership subsequently decided that, despite our opposition to the M-CORES legislation, we could move forward in good faith to address the threats we saw to our state's most fragile natural resources and rural communities, not only from the construction of the M-CORES roads, but from the sprawl they could generate.

We raised concerns and proposed recommendations on these issues throughout the task force process. We formalized many recommendations in our guiding principles comments submitted on July 20, 2020, and then refined them considerably to our top priorities in the PD&E recommendations on August 24, 2020. Individual task force members reinforced these top priorities in discussions with staff.

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These priorities were reiterated again in our letter to you, dated October 8, 2020. In this letter we noted that 1000 Friends of Florida's Board of Directors unanimously agreed, and our three task force representatives concurred, that our minimum expectation was that the final task force reports would:

1. Require a preliminary determination of transportation need and financial feasibility **PRIOR** to the PD&E process, to prevent hundreds of millions of taxpayer dollars being spent designing roads that may be neither needed nor financially feasible according to FDOT standards.
2. Require the purchase or protection of key environmentally sensitive lands at interchanges within a 10-mile radius **PRIOR** to construction to protect natural lands and waters from the impacts of sprawl.
3. Require the protection through easement or other means of key interchange lands within a 5-mile radius to protect rural communities **UNLESS** those lands are currently served by municipal water and sewer or are designated for future development as an industrial job center.

We appreciate language in each of the three task force reports indicating that a preliminary determination of transportation need and financial feasibility will be undertaken PRIOR to the PD&E process. But the other two amendments related to land acquisition at interchanges were submitted again by our representatives as final amendments and ultimately were either watered down or rejected at the final task force meetings for each of the three corridors.

When the issue of whether the prevention of sprawl at interchanges should be a state or local responsibility arose, FDOT staff repeatedly maintained it is a local responsibility. Please understand, 1000 Friends of Florida firmly defends local home rule each legislative session, filed an amicus brief supporting Coral Gables' plastic bag ban to uphold the rights of local governments to make local decisions, and continues to advocate strongly for local government home rule. We also ardently believe in the supremacy of local comprehensive plans and have achieved significant legal victories over the years on this very issue.

But these interchanges would be built at the **state's initiative** and with a massive infusion of **state taxpayer dollars** through M-CORES. Further, these roads would have significant impacts on **resources of state significance**, including the vulnerable Floridan Aquifer, which provides drinking water to millions of Floridians. Therefore, it is the **state's responsibility** to require responsible sprawl-prevention measures such as the above-outlined land protection **to ensure that state dollars for interchanges do not destroy state resources such as drinking water**. At the same time, **local governments should adopt and enforce responsible comprehensive plan amendments** to further curtail sprawl and protect significant local, regional and state natural and other resources and promote sustainable community revitalization.

The failure to protect natural resources and rural communities from the impacts of sprawl leaves the distinct impression that one of the purposes of these highways is to spur new residential development in rural areas, and that purpose is not found anywhere in the M-CORES statute. At the end of the day, we think the directives in the report fall short of the mandate in the statute—and our bottom line—to protect the environment and revitalize rural communities.

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On another matter, we register our concern over the use of the word “consensus.” The law only required FDOT to “utilize an inclusive, consensus-building mechanism.” It did not demand “consensus” among the stakeholders on the entire report. “Consensus” is between the stakeholders and not the stakeholders and the department. We understand the statutory obligation to submit the reports by November 15. However, because we do not agree with the three final reports, we request that the word “consensus” be removed from each of them.

For the reasons expressed herein and in our prior communications, 1000 Friends of Florida is NOT in support of the final reports prepared by FDOT pursuant to the Multi-Use Corridors of Regional Economic Significance program, F.S. 338.2278. Please note this when submitting the reports to the Governor and the Legislature.

Thank you.

Sincerely,



Susan L. Trevarthen, Board Chair



Andrew Dickman, Board Member
Southwest-Central Florida Corridor Task Force Representative



Paul Owens, President
Northern Turnpike Corridor Task Force Representative



Thomas Hawkins, past Policy & Planning Director
Suncoast Corridor Task Force Representative

cc: Will Watts, Chief Engineer, Florida Department of Transportation
Huiwei Shen, Chief Planner, Florida Department of Transportation

