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October 8, 2020 – **VIA EMAIL**

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

RE: M-CORES Task Force Reports.

Dear Secretary Thibault:

As you know, 1000 Friends of Florida opposed the 2019 legislation authorizing the three Multi-use Corridors of Regional Economic Significance (M-CORES). Nevertheless, we sought and accepted your appointments to the M-CORES task forces to advocate, in good faith, a strict adherence to the statutory commandment to “evaluate the need for, and the economic and environmental impacts of, hurricane evacuation impacts of, and land use impacts” of each of the corridors. (Emphasis added).

Our organization was founded in 1986 to promote a sustainable approach to development, deter sprawl, and protect Florida’s unique natural environment. It is widely documented that transportation systems are the prominent driver of land use patterns – good and bad. The enormity of the M-CORES project, unless it is thoughtfully planned and properly targeted, can be a formidable stimulator of inappropriate growth. We maintain that the priority for limited transportation dollars should be to address transportation issues in existing communities and provide multiple transportation options.

1000 Friends’ bi-partisan Board of Directors met last week and discussed the M-CORES task force reports. The Board is unanimous in its determination that there are three major shortcomings to the reports that must be addressed as follows:

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. If both transportation need and financial feasibility are found, require the purchase or protection of key environmentally sensitive lands at interchanges PRIOR to construction to protect natural lands and waters from the impacts of sprawl.
3. If both transportation need and financial feasibility are found, require the protection through easement or other means of key interchange lands within a 5-mile radius UNLESS those lands are currently served by municipal water and sewer or are designated for future development as an industrial job center.

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Each of these requirements are discussed in greater detail below and have been shared previously. We also note with concern a lack of clarity on the role of local and state government in the comprehensive planning process, also discussed below.

Undertake preliminary determination of transportation need and financial feasibility:

The task forces' opportunities to influence this process were sharply and summarily curtailed by the Florida Department of Transportation (FDOT) and its consultants for M-CORES "due to the early stage of planning ... and the limited data and analysis on potential need and impacts available at this time," according to language that appears in all three draft task force reports. This was a major concession, legally and practically, for task force members and the organizations they represent. It was never formally proposed to members for approval before it appeared in the draft reports.

This might have been mitigated by an explicit commitment from FDOT to suspend planning for M-CORES pending a preliminary determination of transportation need and financial feasibility prior to the PD&E process — the sequence called for under the state's corridor planning process. Each of our task force members proposed this provision for inclusion in their task force reports. However, it was not adopted in any of the reports.

Because of this, hundreds of millions of public dollars are being spent on the PD&E process with the possibility of an eventual determination that the roads are neither needed nor financially feasible. Furthermore, by its automatic inclusion in FDOT's 5-year work program without meaningful legislative or gubernatorial oversight, M-CORES will have a significant impact on the state transportation system, with the rest of the state subsidizing these corridors for a generation at the expense of their own transportation needs. We consider the absence of any commitment from FDOT to undertake a preliminary determination of need and financial feasibility before moving ahead with the PD&E process a serious obstacle to our ultimately supporting the reports.

If need and feasibility are established, implement the following changes:

1. Protect key natural lands at interchanges:

Also under the M-CORES legislation, the program is legally obligated to "protect the environment and natural resources" and "revitalize rural communities." These are higher-than-usual standards for transportation projects implemented under state law. Each of our task force representatives submitted two proposals to ensure M-CORES complies with these statutory requirements. These proposals are consistent with provisions in the Wekiva Parkway plan — touted early on by FDOT as a model for the M-CORES process — namely, that provisions be included to limit the potential of interchanges to induce sprawl, and that significant natural lands should be acquired before funding of construction.

One proposal would have fulfilled the legal obligation to protect the environment and natural resources by preventing the loss of sensitive land and impairment of vulnerable waters where they would be most at risk, in the proximity of M-CORES interchanges. It would have required the protection within 10 miles

of each planned interchange by acquisition, easement or other legal instrument — *before* construction begins — of the following: lands identified as Clip 1, 2 or 3 in the Florida Natural Areas Inventory; all lands identified for purchase by Florida Forever, Rural and Family Lands, and other state, county and municipal conservation land acquisition programs; springs and locally designated springs protection zones and resource preservation areas; and Florida Ecological Greenways priorities 1 or 2.

Far from being arbitrary or excessive, this proposal is appropriate to meet the high standard dictated in the law. It was not adopted, however.

2. Limit sprawl at interchanges:

The other proposal would have promoted the revitalization of rural communities by protecting their character, agricultural lands and existing businesses from the negative impacts of new interchanges nearby. It would have barred construction of any interchanges until all land not currently served by municipal water and sewer or not designated for future development as an industrial job center within a 5 mile radius of the future interchange is protected by conservation easement, agricultural easement, purchase of development rights or other similar instrument. This also was not adopted.

We are of course aware that there are numerous provisions in the task force reports intended to provide some measure of protection for sensitive environmental assets and rural communities. Some of these provisions were proposed by our representatives. We appreciate their inclusion.

However, the reports fail to guard adequately against the heightened threat posed by interchanges to both vulnerable natural resources and rural communities. Rather than commit to acquiring conservation lands, the reports call for FDOT and its partners to identify *opportunities* to *advance* acquisition and funding priorities — an aspirational goal that falls short of a requirement and fails to specify a complete list of priorities.

3. Address comprehensive planning issues:

Regarding the protection of land and environmental assets surrounding interchanges, the reports leave it up to local governments to consider whether land uses and environmental protections are appropriate or whether comprehensive plans need to be amended. It is indeed fitting for local governments to have a say in these decisions, but not the last word. A decision by a local government not to amend its comprehensive plan should be respected by FDOT, even if it forces a rerouting of a transportation corridor or rules out a local interchange. However, if local governments allow interchanges to become engines of sprawling development, the harmful impacts will almost certainly be felt far beyond their boundaries and impact resources of regional and even statewide significance, thus requiring state oversight per Florida's adopted comprehensive planning process.

It is important to understand that future development in many of these rural counties would be stimulated primarily due to the investment of hundreds of millions of public dollars over the coming decade. This clearly reflects that the state indeed has a vested interest in and responsibility for what occurs in these rural counties, as it is financing the road system stimulating this development and its associated impacts. It would be more effective and cost-efficient for the state to invest in broadband, independent of the construction of roads, as a much-needed rural economic development strategy that would enhance employment, education and other opportunities without stimulating sprawl.

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Further, the impacts of the toll roads are not confined by any county's borders. Water is a prime example. Should one county choose sprawling development patterns that increase water withdrawals and degrade water quality, those impacts can be manifested throughout the corridor. Given that the waters in most of the corridor feed the Floridan Aquifer, in comprehensive planning parlance a "resource of statewide significance," again the state should play a leading role in the planning process to protect Florida's drinking water.

Concluding thoughts:

Additionally, the process for final review and approval of the task force reports at the final meetings later this month has not been settled for task force members. We request a formal vote to register either support, conditional support, or cannot support on the final report so that each task force representative's position can be clearly indicated for the record.

Unless the draft task force reports are amended to require a determination of need and economic feasibility before M-CORES planning continues into the PD&E process, and then amended to meet the higher legal standards for environmental protection and community revitalization through the protection of key lands at interchanges as outlined in this letter and previous task force submissions, we will be unable to support them.

Sincerely,



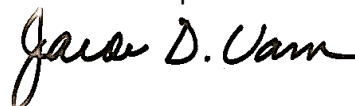
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cc: Will Watts, Chief Engineer, Florida Department of Transportation
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