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The purpose of this letter is to set forth the comments and concerns of The Nature Conservancy (TNC) regarding the proposed M-CORES corridors of the Suncoast Connector, Northern Turnpike Connector and Southwest-Central Florida Connector as we approach the half-way point of the M-CORES Task Force process. We appreciate that FDOT staff and consultants have been generous in their outreach to stakeholders, including with TNC. From the perspective of TNC, we are evaluating each corridor through the following criteria:

- 1) Are the corridors needed and has the need been demonstrated for each of the individual corridors based on robust data and modeling?
- 2) Will the proposed new toll road corridors be economically self-sufficient such that state transportation trust fund money will not be used to fund shortfalls in revenue and potentially divert funds away from projects that improve existing transportation infrastructure and fund low-carbon transportation alternatives?
- 3) Will the corridors undermine key conservation objectives to preserve existing conservation lands and lands identified for future protection as vital habitat and wildlife corridors? Particularly for the Southwest-Central Florida Connector – will the lands identified as critical for Florida panther protection - Primary, Secondary and Dispersal Zones – be negatively impacted and fragmented posing yet another threat to our state animal and one of the most endangered species in the World?
- 4) Will the corridors be designed to factor in the future effects of sea level rise over the useful life of the roadways?
- 5) Will the corridors induce development in areas that are identified as critical habitat, important wildlife corridors, and important to maintaining the water quality and quantity of important surface and groundwater resources?
- 6) Will the new corridors significantly increase Florida's greenhouse gas emissions?

Need

At this juncture in the task force process, TNC is not convinced of the need for the Suncoast Connector, Northern Turnpike Extension Connector or the Southwest-Central Florida Connector. We take seriously the task force charge set forth in s. 338.2278(3)(c)4, that states:

*Each corridor task force shall evaluate **the need for**, and the economic and environmental impacts of, hurricane evacuation impacts of, and land use impacts of, the related corridor as identified in subsection (2).*

While we appreciate that detailed modeling will not occur until the PD & E stage of corridor development, we suggest that a more thorough discussion of need be undertaken. For example, with respect to the Suncoast Connector, the only information that has been provided to the task force depicts light to moderate traffic volumes in the study area and the only high traffic volume areas depicted are on I-75. While FDOT staff and some stakeholders have identified the Suncoast Connector as a potential reliever road to I-75, we have not been provided with origin and destination data that indicate that users from eastern origin and destination points would use a Suncoast Connector alignment that connects to I-10. Similarly, the Task Force has not been provided with hurricane evacuation behavioral data that demonstrates the need for the Suncoast Connector. Finally, while certain data points within the Suncoast Connector study area have high truck traffic volume, it is important to identify whether the truck traffic is associated with local agricultural and silvicultural trucking vs. through freight trucking. As stated by the representative of the Florida Trucking Association, long haul truckers avoid toll roads because of their narrow business margins. As the planned Suncoast 2 extension, when complete, will bypass the only densely populated area of the focus area, the Crystal River/Homossassa Springs area of Citrus County, we question whether adding additional toll facilities along US 19/27 corridor is necessary to address future traffic needs north of the terminus of Suncoast 2.

While the Northern Turnpike Extension Connector is closer to I-75, a needs assessment for this corridor should also evaluate origin and destination data in determining the extent to which the toll road relieves congestion on I-75, particularly for traffic originating outside of Florida whose destination is not the Tampa Bay Area.

Finally, the Southwest-Central Florida Connector study depicts the highest traffic volumes on I-75 and I-4 with moderate volumes within most of the study area and high truck traffic by percentage in agricultural areas versus on I-75 and I-4. As stated above, data on the origin and destination of I-75 users within the study is necessary to understand the extent to which traffic from I-75 and I-4 is relieved by a new corridor, or whether the majority of demand for a new toll road corridor is generated by induced residential development in Southwest Florida.

Financial Feasibility

*Section 338.223 (1)(a), Florida Statutes states: ... **A proposed project or group of proposed projects may not be added to the turnpike system unless such project or projects are determined to be economically feasible***

Economic feasibility is defined by s. 338.221(8), F.S. to mean:

(a) For a proposed turnpike project, that, as determined by the department before the issuance of revenue bonds for the project, the estimated net revenues of the proposed turnpike project, excluding feeder roads and turnpike improvements, will be sufficient to pay at least 50 percent of the annual debt service on the bonds associated with the project by the end of the 12th year of operation

and to pay at least 100 percent of the debt service on the bonds by the end of the 30th year of operation. In implementing this paragraph, up to 50 percent of the adopted work program costs of the project may be funded from turnpike revenues.

(b) For turnpike projects, except for feeder roads and turnpike improvements, financed from revenues of the turnpike system, such project, or such group of projects, originally financed from revenues of the turnpike system, that the project is expected to generate sufficient revenues to amortize project costs within 15 years of opening to traffic.

This subsection does not prohibit the pledging of revenues from the entire turnpike system to bonds issued to finance or refinance a turnpike project or group of turnpike project

Given the magnitude of the cost of building three major new toll road corridors at the same time, and potential limits on the ability to bond the entire cost of construction of three major new toll roads, TNC is concerned the projects will require funding greater than the potential amount that can be generated through revenue bonding alone and beyond the schedule of appropriations set forth in the M-CORES authorizing statute. During meeting 4, a slide depicting the cost estimation process included three steps: 1) Estimate Net Revenue (through an Investment-Grade Level Traffic & Revenue Study); 2) Determine Turnpike Funding Contribution; and 3) **“Address Funding Shortfall,”** which could include funding from the Transportation Trust Fund. The likely prospect that the roads cannot be funded through tolls alone is extremely troubling as it means Transportation Trust Fund dollars that could be used for improving existing transportation infrastructure and providing transit and light rail capacity in urban areas are directed to toll road construction; hence, Florida taxpayers and not road users, will be shouldering cost.

Key Conservation Objectives

The Nature Conservancy is extremely concerned about the impacts of the proposed toll roads on critical land, water and habitat resources that we have been working for over 50 years to protect, through P-2000, CARL, Florida Forever, and TNC donor funded, the full fee purchase of land and conservation easements over agricultural land through private easements, the Rural and Family Lands Protection Act, USDA NRCS easements, DoD REPI conservation easements. In addition, our work includes advocacy for springs, ground and surface water protection, hands-on land management work, and the protection of Gulf of Mexico estuaries. One of TNC's Florida Chapter's most important and long-standing protection priorities is acquiring land (fee and less-than-fee) for the Federally endangered Florida panther. The focus of the past ten years had been to protect habitat that will provide a safe corridor for the panthers to cross the Caloosahatchee River for passage into habitat north of the river. For example, in 2012, the Nature Conservancy initiated a project that combined funding from the Florida Fish & Wildlife Conservation Commission, and the U.S. Department of Agriculture and private funding to purchase a conservation easement over ranch land adjacent to the Caloosahatchee River and has subsequently purchased conservation easements on the adjacent the Black Boar Ranch and the Cypress Creek Grove, a working citrus operation north of the river.

We believe the Southwest-Central Florida Connector threatens these and other important panther habitat linkages that TNC and many partners have worked hard to establish. Construction of a new toll road will induce development on the last remaining Florida panther habitat in Southwest Florida. It is not an overstatement to conclude that the Southwest-Central Florida Connector threatens the future of the Florida panther. The avoidance map for the Southwest-Central Florida Connector should depict the areas identified as Primary and Secondary habitat zones and the Dispersal Zone, which depicts land that is critical for Florida panther movement from South to Central Florida across the Caloosahatchee River.

TNC is a stakeholder in the Suncoast Connector and the Southwest-Central Florida Connector areas in that, in addition to the conservation easements projects referenced above, TNC holds an over 8,000-acre conservation easement on a portion of Avalon Plantation and a 2,250-acre conservation easement on Turkey Scratch Plantation in Jefferson County. TNC owns and manages two significant nature preserves - the 830-acre Saddle Blanket Scrub Preserve and the 4,915-acre Tiger Creek Preserve in Polk County. Conservation easements are just as important as fee acquisitions completed under the P2000, CARL and Florida Forever programs for protecting critical habitat and connecting wildlife corridors. Accordingly, TNC believes all conservation easements (Federal, State, Local and Non-Profit) should be depicted on the avoidance maps prepared for each of the corridors.

Finally, the use of prescribed fire for the management of public lands and conservation easements over privately owned agricultural and silvicultural lands is important to maintaining the habitat values for which the lands were purchased or protected. Prescribed fire management should be a factor that is evaluated in determining avoidance areas and when evaluating alternatives in the PD & E process. One of the most important aspects in conducting prescribed fires is mitigating the impacts of smoke. Wind direction and atmospheric conditions are key components of the fire plan that relate directly to the dispersion of smoke. The preferred wind direction is often based on the proximity of existing roadways and developments, and so the addition of new roads could limit the wind direction options of any planned fire, directly impacting the landowner's ability to manage the land with fire.

As part of the prescribed burn authorization process, the Florida Forest Service (FFS) utilizes a Smoke Screening Tool in order for a determination to be made whether or not the FFS will issue a burn authorization for a proposed date and location based on predicted weather conditions and the presence of identified smoke-sensitive features, such as roads. New roads planned nearby to existing conservation and private agriculture lands that utilize fire as part of the economic value of the land may preclude prescribed burning in some areas, thereby reducing the economic and ecological value of the land. If there are less fires conducted due to a reduced "burn window" then the natural fuels will accumulate, leading to a greater chance of uncontrolled fires.

Sea-Level Rise

TNC believes that new state infrastructure projects should be designed to address the effects of future sea level rise over the life of project and are very concerned that FDOT's drainage and engineering design standards have not been modified to address future sea level rise impacts. The Suncoast Connector study

area includes areas vulnerable to flooding, sea level rise and flooding due to rainfall. Given the identification of hurricane evacuation as a purpose for constructing the toll roads, addressing sea level rise in the evaluation of the feasibility of any alignment and subsequent design is a mandatory rather than an optional design consideration.

Induced Sprawl

The potential adverse impact of the toll roads to Florida's environment is greatest from the potential of the roads to induce sprawl that eliminates and fragments remaining Florida panther habitat and wildlife corridor connections, and negatively effects water quality and quantity. The history of growth in Florida does not inspire confidence that toll road features such as limited access and interchange planning will prevent inevitable growth associated with the construction of major highways. The Northern Turnpike Connector and Southwest-Central Connector toll roads will likely exacerbate urban sprawl growth patterns that are already evident along the Florida Turnpike between Ocala and Orlando, for example, in the vicinity of The Villages. The erosion of state review of local government comprehensive plan amendments has limited the ability of FDOT to comment on amendments that have an adverse impact on state transportation facilities, including interstates and turnpike facilities.

Greenhouse Gas Emissions

As the third most populous largest state in the United States, Florida is one of the top ten carbon emitting states in the United States with emissions from the transportation sector nearing the point of exceeding emissions from the energy sector. Moreover, Florida is particularly vulnerable to the effects of climate change including sea level rise and increased temperature. The Nature Conservancy views the greenhouse gas impact of the proposed toll roads as a negative impact that must be evaluated in assessing the feasibility of construction and the opportunity cost of spending taxpayer dollars on new road construction versus investment in transportation options that encourage compact development and transit. We request that the greenhouse gas emissions impact of the proposed toll roads be conducted as part of the environmental feasibility analysis conducted for each toll road segment.

In summary, as the M-CORES Task Forces continue their work, The Nature Conservancy is focusing on the six criteria identified in this letter. In addition, we recommend adding to the avoidance area maps the conservation lands and hydrologic features identified in the TNC list we provided to you on March 10, 2020. We appreciate that FDOT consultants are evaluating the list against the original avoidance maps and considering the addition of new hydrologic data layers. At this point in the process, we continue to have serious concerns about the lack of evidence for need and the environmental impacts of the proposed toll roads on land and water resource protection. Many of our members and donors are reaching out to us with their concerns.

Indeed, the Winter edition of the national Nature Conservancy magazine that is received by all TNC members, highlights the threat that loss of habitat and new and expanded roads pose to the future of panthers in Florida. We are not comfortable that the proposed Southwest-Central Florida Connector,

and potential induced growth that follows, are compatible with Florida panther recovery efforts. We hope the issue of impacts to Florida panther will receive a more detailed discussion during the remaining Southwest-Central Florida Connector Task Force meetings.

Thank you for your consideration and we look forward to providing additional input during the remaining M-Cores Task Force meetings.

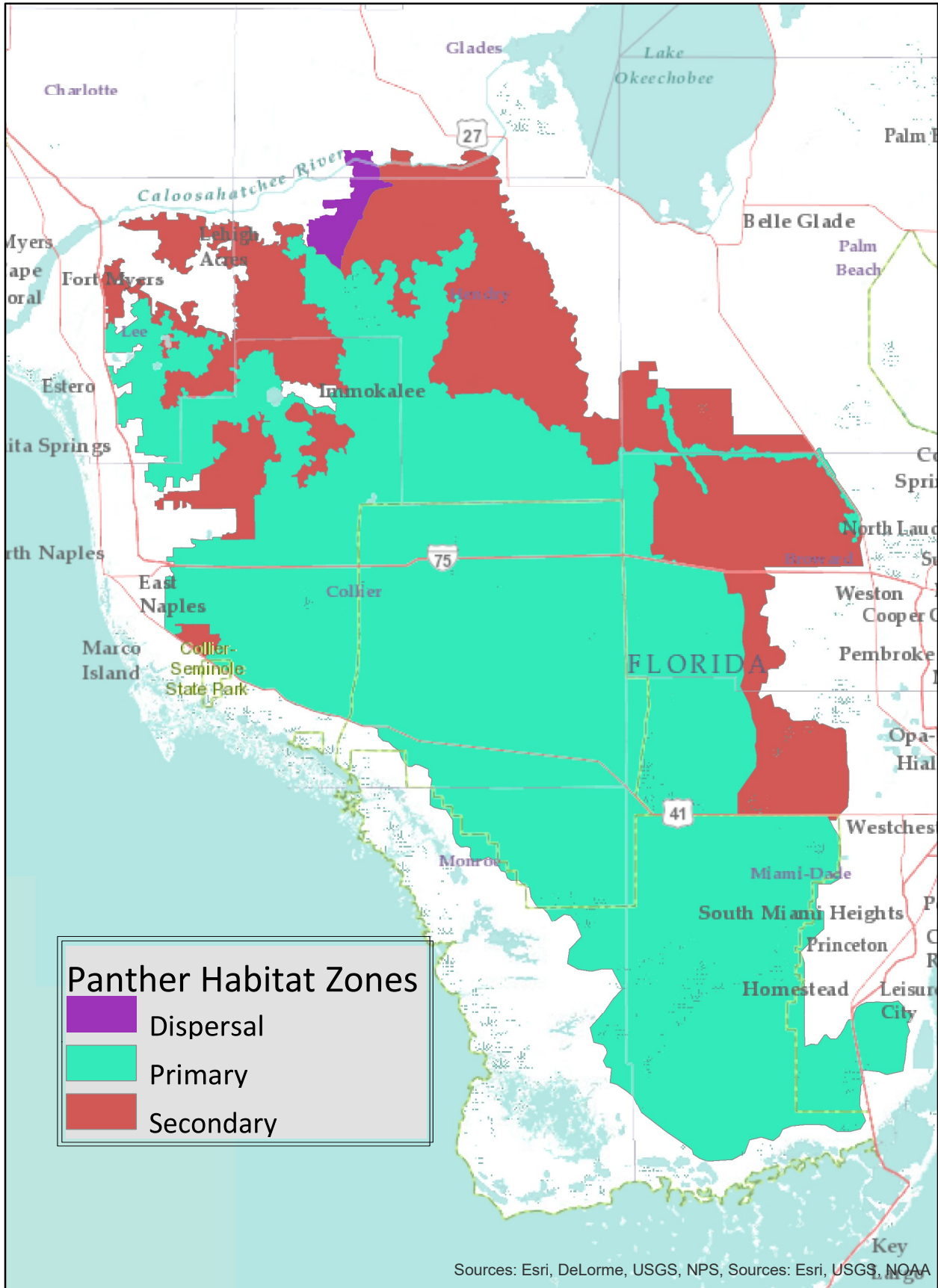
Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Knecht". The signature is fluid and cursive, with a large loop at the end.

Greg Knecht
Deputy Director
The Nature Conservancy

Enclosure(s): FL Panther Habitat Zones Map/ Identified Conservation Features Missing from Avoidance Maps

Florida Panther Habitat Zones



Panther Habitat Zones

- Dispersal
- Primary
- Secondary

March 10, 2020--Nature Conservancy Identified Conservation Features Missing from Avoidance Maps

Suncoast Connector

21,205-acre Gulf Hammock Conservation Easement managed by Suwannee River Water Management District connecting Goethe State Forest to the Gulf Coast.

Aquifer Recharge and Surface Water Resource Priorities identified on CLIP Version 4 maps.

Aquifer recharge areas identified by the Suwannee River and Southwest Water Management District for springs and surface water bodies with adopted minimum flows and levels and/or recovery plans.

Northern Turnpike Corridor

Portions of the Gum Slough Southwest Florida Water Management District (SWFWMD) Conservation Easement are missing.

Beville Ranch Conservation Easement (SWFWMD)

Aquifer recharge areas identified by the Suwannee River and Southwest Water Management District for springs and surface water bodies with adopted minimum flows and levels and/or recovery plans.

Marion County Local Comprehensive Plan Agricultural Protection Areas.

Southwest-Central FL Connector

Green Swamp largely missing – AREA OF CRITICAL STATE CONCERN

Florida Panther Habitat Priority 1 and 2 zones and the Dispersal Zone areas. (Map attached).

Aquifer recharge areas identified by the Southwest Water Management District for springs and surface water bodies with adopted minimum flows and levels and/or recovery plans. Upper Lakes Basin Watershed (SFWM), which includes substantial portions of Reedy Creek and Lake Marion Creek drainage basins. This area is the headwaters for the Kissimmee/Lake Okeechobee/Everglades ecosystem.

Additional SFWMD owned/managed lands missing - Kissimmee River, Paradise Run, N of Lake Okeechobee Storage Reservoir, River of Grass, Stormwater Treatment Areas, all Corkscrew Regional Ecosystem Watershed is missing, Corkscrew Regional Mitigation Bank, Caloosahatchee Basin Water Storage Reservoir, Bright Hour Watershed Conservation Easement.

Most Polk County Parks are missing – Saddle Creek County Park, Withlacoochee River Headwaters, Circle B Bar Reserve, Lakeland Highlands Scrub, Lake Lowery Marsh, North/Walk-in-Water Creek, IMC-Peace River Park.

Most Highlands County Parks missing – Sun 'n Lake Preserve

Florida Department of Agriculture and Consumer Services (DACS) Rural and Family Lands Conservation Easements such as K-Rocker, Goolsby Ranch, Sandy Gully, S.Y. Hartt, JB Ranch, Charlie Creek Cattle Company, Fussell Farms Old Town Creek.

FDEP, Division of Water Resource Management managed areas and conservation easements are missing - FPC Hines CE, Little Payne Creek, Hardee Lakes CE, Hookers Prairie CE's, Bowlegs Creek, South Fort Meade Hardee County CE, Hardee Lakes CE, South Prong Alafia River.

Natural Resource Conservation Service (NRCS) Water Resource Program (WRP) Conservation Easements such as #142, #200, #228, #153, 193, #221, #187, #205, #191, #197, #204, #186, #150, #151, #171, #120, #111, #169, #133, #177, #117, #189, #174, #126, #175, #185, #158, #139, #103, #106, #104, #105 are missing.

TNC, Readiness and Environmental Protection Integration Program (REPI), & NRCS ALE Conservation Easements such as Rafter T Ranch Phases I-IV, Bass Ranch, Cypress Creek Grove, Lone Ranger Forge Ranch, Black Boar Ranch, XL Ranch

Large portions of the Fisheating Creek/Lykes Brothers Conservation Easement

United States Fish & Wildlife Service (USFWS) Florida Panther Conservation Bank Conservation Easement

Florida Fish & Wildlife Conservation Commission (FWC) Panther Passage Conservation Bank Conservation Easement

FDEP LaBelle Ranch, Inc. Conservation Easement

Okaloacoochee Slough State Forest

TNC Preserves – Saddle Blanket Scrub Preserve, Tiger Creek Preserve

Archbold Biological Station

Collier County Parks – Dr. Robert H. Gore III Preserve, Camp Keais Strand, Winchester Head, Rivers Road Preserve, Pepper Ranch Preserve, Caracara Prairie Preserve,

Corkscrew Swamp Sanctuary (Audubon)

Lee County Parks – Edison Farms Preserve, Flint Pen Strand, Gator Hole Preserve, Airport Mitigation Park, Wild Turkey Strand Preserve, Six Mile Cypress Slough Preserve, Harn's Marsh, Buckingham Trails Preserve, Alva Scrub Preserve, Greenbriar Swamp Preserve, Bob Janes Preserve, Telegraph Creek Preserve

Babcock-Webb Wildlife Management Area (WMA)

Southwest Florida Water Management District – Deep Creek Preserve, RV Griffin Reserve

Charlotte County Parks – Prairie Creek Preserve, Shell Creek Preserve