

JACK SCHRAMM COX, ESQ.

General Counsel

THE GUARDIANS OF MARTIN COUNTY, INC.

12171 S.E. HECKLER DRIVE

HOBE SOUND, FLORIDA 33455

JSCOXPA@GMAIL.COM

(561) 801-5134

Pipeline and Hazardous Materials Safety Administration
U.S. Dept. of Transportation, Docketing Management System
West Building, Ground Floor, Room W12-140
Routing Symbol M-30
1200 New Jersey Avenue S.E.
Washington, D.C.

RE: Docket Number PHMSA-2018-0025 (HM-264) and RIN 2137-AF40

Notice of proposed rulemaking(NPRM) to authorize the transportation of methane, refrigerated

liquefied gas (A/K/A liquefied natural gas or "LNG") by the rail in DOT 113C120W specification rail

tank cars

Dear Pipeline and Hazard Materials Safety Administration (PHMSA),

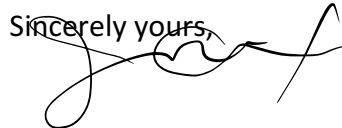
As General Counsel, on behalf of The Guardians of Martin County, Inc. a Florida based 501c3, not for profit corporation, I wish to acknowledge and to incorporate herein by reference the comments and the position statement of the Martin County Board of County Commissioners dated December 20, 2019.

The Guardians of Martin County recognize the ultra-hazardous risks inherent in the transportation of LNG through the narrow and heavily populated corridor of coastal south Florida. The proposal under consideration is that the LNG activity will share the same rail bed on which high speed passenger trains, currently operating between Miami and West Palm Beach (and eventually to be extended to Orlando) in their first two years have killed over three dozen citizens in many collisions. All this current activity is, and related future activity will be, conducted on tracks, road beds and bridges all now in deteriorated and antiquated condition, with some over 100 years old.

The Guardians request a full and complete review, examination and testing of the facts, evidence and design of the equipment, the infra structure and the safety devices and plans of the proposed LNG operations along this route. Without specialized equipment, supervised oversight and extensive safety devices and improvements, and critical and intensive emergency training for dealing with possible operational catastrophes in this corridor, such LNG activity represents simply too great of a foreseeable but avoidable risk to our citizens and our environment.

As an IRS 501c3 tax-exempt organization, The Guardians are authorized and able to assist governmental agencies to gather data, engage experts and provide independent analysis of designs, plans and protocols for this kind of activity, upon the receipt of a written request of any agency. If you wish this kind of assistance, we stand ready willing and able to be as helpful as possible.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jack Schramm Cox", written over the text "Sincerely yours,".

Jack Schramm Cox, Esq., General Counsel, The Guardians of Martin County, Inc.