



**Planning and Development
Services Department
Planning Division**

M E M O R A N D U M

TO: Board of County Commissioners

FROM: Mark Satterlee, AICP, Planning & Development Services

DATE: November 13, 2014

SUBJECT: All Aboard Florida Draft Environmental Impact Statement - Staff Report

Background

The All Aboard Florida (AAF) project proposes passenger rail service between Miami and Orlando with stops in Fort Lauderdale and West Palm Beach. The project consists largely of the installation of a second track in the existing FEC right-of-way.

AAF has applied for a Railroad Rehabilitation and Improvement Financing (RRIF) loan from the Federal Railroad Administration (FRA). As part of the National Environmental Policy Act (NEPA), an Environmental Impact Statement (EIS) is part of the federal process to receive funds from any federal agency. The Draft EIS report was issued on September 19, 2014 and has a 75-day comment period. The comment period ends on December 3, 2014.

On October 1, 2014, St. Lucie County staff initiated a review of the DEIS with regard to the required analysis of the projected impacts on St. Lucie County.

Staff Review

The bulk of the analysis is contained in the 500-page document is in Chapters 4 and 5. Most of the comments, concerns and questions are directed at the information contained therein. Staff also pointed out obvious errors in the report.

This memorandum consists of the dozens of comments generated by staff and also includes comments from St. Lucie Village, Fort Pierce Police and the St. Lucie County Fire District Resolution. The staff review consisted of parceling up the document into sections to be reviewed by the department and staff most closely aligned with the subject matter. That said, staff cannot claim to have the professional expertise to conduct substantive review or analysis of some document segments – such as noise and vibration. So, even if the analysis were more complete, staff would likely recommend that other experts be retained to assist in the review. For these reason, a primary recommendation should be that St. Lucie County be afforded an opportunity to

provide supplemental comments to FRA particularly as it relates to Economic, Environmental Justice, Noise, Vibration and Public Safety concerns.

St. Lucie County response to the DEIS provided by:

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Leslie Olson, AICP, Planning Manager
Monica Graziani, Building & Code Regulation Manager
Amy Griffin, Regulations Manager, Environmental Resources Department
Donald West, P.E., Public Works Director
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Jason Bessey, Stormwater Program Coordinator, Water Quality Division
Beth Ryder, Director, Community Services
Tom Daly, Emergency Management Coordinator
City of Fort Pierce Police Department
Richard V. Neill, Jr., Esquire, St. Lucie Village
St. Lucie County Fire District

Findings

In general, it is the opinion of staff the AAF DEIS is mostly a glossing over of a majority of the issues required to be analyzed in the document. While it appears that some issues did receive a more substantive review – the Environmental and Navigation issues, in particular – close analysis reveals that specific impacts to St. Lucie County are simply not addressed. Further, impacts such as Economic, Transportation, Environmental Justice, Noise, Vibration and Public Safety were not subject to a meaningful and substantive review. The bottom line is that the County will receive all the impacts and none of the benefits from the project.

The tone of the entire DEIS clearly favors the desired outcome of using the existing FEC corridor with the primary rationale being that because the FEC corridor has been in existence for such a long time that any new or additional impacts are marginal at best and in most cases simply not significant enough to warrant deeper analysis. As a result, staff's comments, concerns and questions are directed towards the lack of information or omitted information. Further, it appears that specific impacts on St. Lucie County have mostly been ignored since there is almost no acknowledgement of the potential impacts of significant increase in rail activity to such places as the City of Fort Pierce, St. Lucie Village, residents in northern Fort Pierce and along Indian River Drive or the numerous County Preserves that line the corridor.

It is also the opinion of staff that the Route Alternatives section of the report did not conduct a meaningful analysis of routes other than the existing FEC right-of-way. It is understood that from a purely economic view, use of the existing corridor is the easiest and most cost effective solution for FEC and AAF. However, for the impacted communities and the interests of the greater good of the transportation needs of

Southeast and Central Florida, it would seem that the EIS process would be the obvious venue to require this broader alternative analysis be performed in a truly meaningful way.

Planning & Development Services

Chapter 4 – Affected Environment

Page 4-2 - 4.1.1.2 Affected Environment: Existing Land Uses. In addition to low density residential uses and undeveloped lands, the FEC ROW passes through preserve and park lands, commercial and services, industrial and medium density residential.

Page 4-4 – Comprehensive Plans: Only plans are listed for counties on the route. All municipalities along the route also have comprehensive plans, including the City of Fort Pierce and St. Lucie Village in St. Lucie County.

Page 4-13 – Table 4.1.2 – 1: This table is out of date as it lists I-95 through SLC as consisting of 4-6 lanes. FDOT has nearly completed the 6-8 lanes through the entire county. The DEIS purports to consider transportation infrastructure in Section 4.1.2. However, it does not acknowledge the following St. Lucie County transportation infrastructure: 4.1.2.3: Does not address St. Lucie County's transit program; and 4.1.2.4: Does not address St. Lucie County's International Airport or customs facility.

Page 4-27 – 29 Economic Impact: There is no meaningful economic analysis related to the impacts of additional trains and crossing closings frustrating access to businesses. Nor is there any analysis of potential impacts to property values of increased noise, vibrations and access to business or residences. Of particular concern is the lack of awareness of the potential economic/property value impact in downtown Fort Pierce, the barrier islands, along Indian River Drive and St. Lucie Village.

Page 4-37 – Figure 4.2.2-1 Sound Levels of Typical Noise Sources: This figure leaves out the noise level (dBA) created by a diesel locomotive traveling at 90+ miles per hour which is the speed suggested in the EIS for St. Lucie County.

Page 4-59 – Map: Taylor Creek is mislabeled as "Taylors Creek."

Page 4-60 – Table 4.3.4-2: Moore's Creek is mislabeled "Moore Creek."

Page 4-77 – Table 4.3.4-2 Floodway Crossings: St. Sebastian Creek is in Indian River and Brevard Counties.

Page 4-104 – Table 4.4.1-1: St. Lucie Village is not identified in the table nor is it described in the ensuing text in this section.

Page 4-102 – Environmental Justice: The DEIS recognizes the high concentration of Environmental Justice communities in St. Lucie County but fails to perform an adequate analysis of the impacts and benefits of this project on these communities:

Executive Order #12898 acts to ensure that federal funding balances the impacts and benefits of funded projects on minority and disadvantaged persons and communities. The DEIS accurately identifies but does not adequately assess the Environmental Justice communities within the project study area. It shows St. Lucie County has the second highest population of non-white populations, and the lowest median income of all counties within the project area. It identifies St. Lucie County as the second lowest household income of all affected census tracts and second highest concentration of low-income populations within the project area.

While the fundamental goal of environmental justice intends to balance benefits with impacts on identified minority and disadvantaged communities, this project places all impacts on a community with a very high concentration of environmental justice communities while providing no benefits. It is significant that this is a multi-modal transportation project which proposes no transit benefits to environmental justice communities in need of such facilities. This issue is not identified and should be addressed and analyzed in final EIS. Providing a rail station for the City of Fort Pierce could act to mitigate this environmental justice conflict.

Page 4-115 – Table 4.4.4-1: 27 crossings are listed in this table for St. Lucie County. However, other tables list 21 crossings.

Page 4-119 – Barriers to Handicapped and Elderly: No analysis.

Page 4-125 – Cultural Resources: The DEIS does not recognize a number of historic and archeological resources in unincorporated St. Lucie County. Therefore, the DEIS cannot accurately analyze the impacts to the following resources:

The following archeological resources are within the subject study area as defined on figure 4.4.5-1, and are identified on their Florida Master Site Files as “recommended for preservation and further study,” and “insufficient information to determine National Register eligibility.” Upon development review, if such a resource is identified, the County requires a Phase One archeological survey in order to commence development. The following archeological sites were not listed in the DEIS:

1. 8SL 3063 Savannahs North Dune
2. 8SL 1720 4521 South Indian River Drive
3. 8SL 1719 1811 South Indian River Drive
4. 8SL 292 Walton Railroad #2

The following historic cemetery is not listed in the FMSF or this DEIS, but must be considered as it falls within the project study area:

- Palms Cemetery: 7201 South Indian River Drive

The County also owns an archeological site lying within the project study area, and in City of Fort Pierce limits: Old Fort Park (8SL3). This site is the location of a significant 10,000 year old burial mound (one of the largest on the East Coast of Florida,) the site of an Ais Indian village, and is significant for historical events, as it is the site of the U.S. military installation during the second Seminole War. Old Fort Park is listed both on the National Register and the local City of Fort Pierce register of historic places, and is not mentioned the DEIS.

Furthermore, the entirety of the FEC ROW and project study area falls within the Indian River Archeological Zone as identified in “An Archeological Survey of St. Lucie County, Florida,” (2002). The Indian River Archeological Zone is identified in the Archeological Survey as containing “more [archeological] sites than any other in the [countywide] survey. This is due to the fact that the Indian River Lagoon was used heavily during prehistoric times for procurement and settlement... This area, especially the western shore of the Indian River in the Fort Pierce and St. Lucie Village areas also played an important role in the early history of the County, and it is likely that many military and early pioneer sites are or once were located in this vicinity.” The Indian River Archeological Zone Archeological zone is listed as an “A” density rating in the 2002 survey. This means that the Archeological Zone has a demonstrated high archeological site density. Section 4.11.13 of the St. Lucie County Land Development Code requires a Certificate to Dig for any “construction, demolition, large-scale digging, removal of trees or any activity which may reveal or disturb an archeological site in an archeological zone.” For any development application within an archeological zone, St. Lucie County requires the completion of a Phase One archeological survey in the affected area. A Phase One archeological survey should be performed along the length of this route through St. Lucie County in keeping with the adopted Land Development Code, prior to any development activity in the project study area. The fact that the entirety of the project study area falls within an Archeological zone with a “A” site density rating increases the importance of a Phase One archeological survey prior to any development activity.

Chapter 5 – Environmental Consequences

Page 5-3 – Land Use – North-Corridor: The DEIS indicates that the St. Lucie County Comprehensive Plan supports the reestablishment of passenger rail service along the east coast. This is a true statement. However, what those policies represent is a desire for passenger rail service that provides service to the County. For many years, the City of Fort Pierce and St. Lucie County has sought the establishment of either Amtrak and/or Tri-Rail service and the comprehensive plan recognizes this aspirational goal. All Aboard Florida provides no service to St. Lucie County. Rather, the County only receives the impacts and no benefits. This is not consistent with the comprehensive plan.

Page 5-4 – Section 5.1.1.2 – Indirect and Secondary Impacts: The DEIS references “induced growth” but provides no definition. Presumably, this means that implementation of the project would stimulate development or other potentially beneficial economic benefit. The plan indicates that there is no induced growth other than that proposed at Orlando International Airport. Again, this underscores that the project provides no meaningful benefit to St. Lucie County. The County receives the impacts and no benefits. Further, without a station - which might induce activity in downtown Fort Pierce - the opposite may occur and the negative impacts of additional train traffic frustrating access to downtown may spur disinvestment or discourage new investment. However, this scenario is not covered here or in the economic impact section.

Page 5-8 – No Action Alternative: This section declares under the no-build option freight train configurations would increase to incorporate the anticipated annual cargo growth of approximately 3% annually through increase in train length and speed. The report further states that the demand for freight capacity is expected to grow along the North-South Corridor up to 18 trains per day in 2016. The projected increase in freight activity would result in minor increases in local roadway closures, but total impacts relative to existing conditions would be minimal. The report then pivots to indicate that failure to build the passenger train would result in greater congestion on SR 528, I-95 and the Turnpike.

What the report does not sufficiently address here or elsewhere is the increase in freight traffic with the build option and the resultant impacts across the system in St. Lucie County. With two tracks, freight traffic will be able to increase substantially even with the passenger service. This scenario addressed only to the extent there will be impacts on two of 27 crossings in St. Lucie County.

Page 5-27 – Fixed Bridges: EIS states that the conclusion of FRA is that elevating fixed bridges would not be feasible because of significant delays, costs, and risks associated with the use of elevated structures makes raising any of the corridor bridges not feasible. In the opinion of staff, this lack of substantive analysis is indicative of the pre-ordained, self-serving conclusions throughout the DEIS that any activity other than as proposed will not receive a meaningful review.

Pages 5-39 through 5-52 – Noise and Vibration: The conclusion of the Noise analysis is that despite increases in both passenger and freight train activity the proposed project will have no permanent noise impacts as a result of using wayside horns at crossing versus locomotive horns. Staff is not qualified to analyze the findings and suggests that professional technical assistance would benefit the County in better understanding the analysis provided and the actual impacts. However, consistent with much of the analysis contained in the DEIS that the findings are indicative of the pre-ordained conclusions that what is proposed will not substantively impact St. Lucie County.

Staff has the following questions and comments related to the information provided:

- It is not clear that this analysis includes locally requested quiet zones and what impact the implementation of quiet zones might have at crossings;
- As questioned earlier, the noise level information provided on Page 4-37 – Figure 4.2.2-1 Sound Levels of Typical Noise Sources, leaves out the noise level (dBA) created by a diesel locomotive traveling at 90+ miles per hour which is the speed suggested in the EIS for St. Lucie County.
- **The summary of projected noise levels found on page 5-48 shows the dBA levels at crossings and along the mainline no higher than 63.1 dBA.** However, this appears to contradict the noise level figure on page 4-37, which indicates that sound levels for an idling locomotive is more than 70 dBA and a diesel locomotive traveling at 50 mph at nearly 90 dBA.
- Table 5.2.2-10 Summary of Noise Levels for Residential Receptors, further confuses the issue stating that existing noise levels are more consistent with the findings on page 4-37 - but, despite increasing train traffic the future noise level will be consistent with a train traveling at 50 mph – or 74 dBA – versus what is stated in the table on page 5-48.
- The No-Action alternative actually appears to increase noise impacts because of the increase in freight activity – longer, faster and more frequent trains. However, the DEIS concludes that there would be no increase in noise impacts from the No-Action alternative.

The Vibration analysis is similarly difficult to analyze without technical expertise. The DEIS summary states that the greatest potential for vibration impact along the North-South Corridor is due to the increase in passenger train service to the existing freight activity. The report states on page 5-51 that “Ground-borne vibration levels already exceed the FRA criteria along the North-South Corridor due to the frequency and nature of freight operations.”

Page 5-122 – Social and Economic Environment – North-South Corridor: The report concludes early on in the analysis that because the train corridor has been in existence for more than 100 years, expanding the capacity within the corridor will not result in residential displacement, neighborhood fragmentation or the loss of community between neighborhoods. However, what the report doesn't consider is that the dramatic increase in activity will create the following new impacts:

- Significant increase in crossing being blocked will serve to further frustrate access for residents living along Indian River Drive, St. Lucie Village and the barrier islands;
- Similarly, the increased closings will serve to frustrate business owners, customers, government officials, emergency responders, police, court officials and others accessing downtown Fort Pierce. There is no analysis of the traffic

impacts to increasing congestion, potential significant changes to the traffic pattern along with access in and out of downtown.

Page 5-123 – 5.4.1.2 – Indirect and Secondary Impacts: This section states that the project will have positive indirect and secondary beneficial impacts by improving accessibility between Miami and Orlando. The section focuses on projected population growth in Orange County and WPB south. There is no mention of impacts (negative or positive) in the North-South Corridor.

Page 5-125 - Environmental Justice: This section evaluates whether environmental justice communities would bear impacts from the project would be predominantly borne by low-income or minority populations. The report states that the focus is on residential or job displacement due to property acquisition, neighborhood fragmentation, increase in noise levels and effects to other resources. The report concludes in the summary that impacts to environmental justice communities would result in no job loss, residential displacement, or neighborhood fragmentation – and that there would be no disproportionate impacts to environmental justice communities. Staff has reviewed that analysis and data in the report and has the following comments:

- St. Lucie County has the highest percentage of non-white population in the census tracts bisected by the project on the Treasure Coast. This is significant in that it is likely that these census tracts have a higher probability of being impacted by noise, vibration and other adverse impacts on residential areas created by additional train traffic. Moreover, unlike the environmental justice communities in Palm Beach, Broward and Dade counties, the communities in St. Lucie County receive none of the increased accessibility benefits of passenger rail.
- The rail bridge over Taylor Creek in St. Lucie County is so low that there is no potential for boat access to the Indian River Lagoon or Atlantic Ocean from homes and businesses. This makes development of the upstream portions of Taylor Creek envisioned in the 2007 Taylor Creek Charrette moot. The Taylor Creek Charrette was undertaken by the City of Fort Pierce along with the Treasure Coast Regional Planning Council to spur economic development in and adjacent to an environmental justice section of north Fort Pierce. A focus of the study was expanding marine industry opportunities by opening up Taylor Creek to boat traffic. The study indicated a key to implementing the project would be replacement of the FEC bridge across Taylor Creek. Details of the plan and recommendation are available at the following link:

http://www.tcrpc.org/departments/studio/fort_pierce_taylor_creek/charrette_report_taylor_creek_draft.pdf

Page 5-129-130 – Economic Conditions - Indirect and Secondary Impacts: The report concludes that because no land is being acquired to implement the project and there will be no loss of municipal tax revenue, commercial displacement, or loss of jobs, there

is no economic impact. Further, the report goes on to state that the indirect and secondary benefits will be created by development activity around the stations in West Palm Beach, Fort Lauderdale and Miami. Additional economic benefit of the project will be realized through cost savings associated with reduced highway maintenance and reduced congestion.

Staff has the following comments:

- That there is no impact identified in the DEIS belies the continued point that no real economic impact analysis was performed on how 32 new passenger trains and additional freight trains will have on congestion and frustrating access to the US 1 commercial corridor and downtown Fort Pierce, for example.
- Again, the only identifiable potential economic benefit will be to areas outside of St. Lucie County. Only the negative impacts will be experienced here. Also, on Page 5-4, the report indicates that the only “induced growth” would be at the Orlando Airport. This section appears to add the prospect of induced growth via Transit Oriented Development (TOD) around the stations in the southern communities.
- The last argument that additional benefit of reduced congestion and highway maintenance is self-serving at best and specious at worst. Where the congestion would be relieved is unlikely to be in areas of St. Lucie County. Rather, it is the position of staff that congestion in St. Lucie County is much more likely to increase because of so much additional train traffic adjacent to busy commercial and residential areas. Further, any cost savings for road maintenance is not going to accrue to any noticeable benefit to the tax payers of St. Lucie County.

Page 5-130 -134 – Public Health & Safety: The report states that the project would result in no negative impact to public health or safety. Rather, the project would enhance public safety with improvements to grade crossings signal equipment for vehicular and pedestrian safety. This section does not address the public health and safety concerns resulting from increased delays experienced at crossing for emergency services. All major medical facilities in St. Lucie County lie west of rail corridor.

Page 5-137 – 144 – Cultural and Archeological Resources:

Page 5-155 – Utilities – North-South Corridor: The report fails to include the Fort Pierce Utilities Authority (FPUA) as an electrical transmission/distribution provider along the corridor.

Page 5-158 – Cumulative Impacts: With respect to the broader subject of the social, environmental, economic and transportation impacts on St. Lucie County, the report largely glosses over the actual impacts of the dramatic increase in rail activity anticipated with new passenger service and increases of freight. Examples of the complete ignoring of potential future impacts on St. Lucie County are highlighted in the following statements:

- Page 5-165 – Cumulative Impacts of the Project – Transportation: This section states that the only adverse impacts would be temporary delays during construction and the benefits would be regional improvements to the transportation system for the communities along the east coast. This completely overlooks St. Lucie County which will receive no such benefits and only the impacts.
- Page 5-166 – Cumulative Noise Impacts: This section basically states that noise and vibration impacts will be temporary during construction. Long-term impacts from noise and vibration would not cumulatively increase when considered with the project.

Page 7-3 – Table 7.2-2 Project Mitigation Measures for Unavoidable Impacts – Operational Period: This segment summarizes the proposed mitigation for impacts created by the project. The lack of mitigation measures for nearly all of the impacts staff has identified above underscores the lack of substantive analysis conducted in the DEIS. Moreover, it supports staff’s opinion that the findings of the study were pre-ordained and the analysis that was conducted was tailored to produce the desired outcome. There is no true analysis of impacts so there is no proposed mitigation for: traffic congestion, economic impacts to small businesses, environmental impacts to preserve areas and endangered species, reduced access to residential neighborhoods already impacted by the current level of rail activity, environmental justice, archeological and cultural resources and public safety.

Code Regulation Division – Planning & Development Services

The Draft EIS states the project will result in long-term noise and vibration adverse impact to residents and properties along the N-S Corridor. However, in staff’s view, the report does not provide sufficient detail regarding mitigation of such impacts.

- The report states that vibration levels from the passenger rail may damage fragile structures but does not catalogue the historic establish baseline data on structures and evaluate how the vibration levels may impact or damage fragile structures and provide the necessary mitigation of such adverse impacts. (Pg. 5-44)
- The Draft EIS does not sufficiently detail abatement measures to be taken during construction (Pg. 5–45) The construction noise impact does not include the impact and duration of the noise exposure by type of construction equipment.
- The Draft EIS Report does not sufficiently identify specific land uses in St. Lucie County along the mainline such as schools, theatres, outdoor recreation/preservation areas, golf courses and neighborhoods, that will be most affected by the dramatic increase in heavy rail activity (Pg. 5-44). The Draft EIS

states the North – South Corridor has the greatest potential for vibration impacts and only very generally discusses land uses and buildings, such as concert halls, TV studios, recording studios, auditoriums and theaters that may be impacted by ground borne vibration and noise. Special buildings and historic buildings for each municipality should be mapped, analyzed and recommendations of mitigation provided to lessen adverse impacts. (Pg. 5-44)

- The DEIS states that AAF will pole-mounted wayside horns at all intersections to reduce noise impacts from locomotive horns. However, the specific locations where severe impacts may occur have not been provided or the documentation to justify not using a wayside horn at some intersections. (Pg. 5-39). There are no details as to the tones or frequencies of a wayside horn.
- The Draft EIS stated AAF is working with local communities to create quiet zones as an alternative noise abatement measure to wayside horns and locomotive horns - but there has been a lack of coordination by the AAF within the Treasure Coast area. Further studies are necessary to determine locations of quiet zones to include costs of construction, available funding and input from other jurisdictions. A regional approach on this project with either the TPO or the TCRPC as the lead entity would be highly beneficial with respect to mitigation issues such as noise and quiet zones.
- Concerns of wildlife area, pristine open space and environmentally sensitive lands should be mapped, analyzed and adverse noise impacts explained. Noise impacts can result in adverse impacts to wild and domesticated animals, including various species of livestock and poultry which have not been addressed by the Draft EIS as it relates to the North - South Corridor. Noise exposure limitations shall be provided for each animal category and necessary mitigation improvements.

Public Works and Engineering

The All Aboard Florida project raises concerns as to cost, safety, noise and traffic delays at crossings:

- St. Lucie Village is bisected by the FEC right-of-way and rail line, with residential development on both sides of the tracks. The homes are very close to the tracks and will undoubtedly experience additional noise impacts.
- There are six crossings in the 2.5-mile length of St Lucie Village, four of which offer the only means of access to the neighborhoods they serve. Four crossings are dead end streets that do not connect with adjacent crossings. If these crossings are blocked, there is no other means of ingress and egress.
- The grade crossing plans show a third “center siding” track through almost the entire length of the Village, where the freight trains will be diverted to allow the faster passenger trains to pass by.
- The Fort Pierce switching yard south of Citrus Avenue Overpass appears to have the capability to store multiple trains on parallel tracks. Could the switching yard serve as an alternative to eliminate the need for the “center siding” track through St. Lucie Village?
- The requirements for sounding horns or other warning signals will greatly increase the noise levels throughout the Village. St. Lucie Village has been told they would be responsible to upgrade crossings as required to establish “quiet zones”. Specific costs for crossing improvements have not been received but estimates for similar improvements are well beyond the financial means of St. Lucie Village.
- The County, City of Fort Pierce and St. Lucie Village pay for periodic maintenance of railroad crossings. Staff is very concerned that future crossing maintenance costs will increase significantly. Railroad crossing maintenance is already one of the largest single items in the St. Lucie Village annual budget.
- We are very concerned about safety along the railroad corridor and who will be responsible for paying for safety features such as quad gates at crossings and pedestrian access points.
- There are concerns about traffic delays at all railroad crossings. The frequency of traffic delays could increase significantly with the anticipated increased freight traffic associated with the widening of the Panama Canal and increased Port activity. Could the Fort Pierce switching yard serve to alleviate some of the delays associated with freight trains and/or during business hours? The switching yard does not impact crossings and appears to have adequate space for storage and stacking of freight trains.
- Many of the railroad crossings in St. Lucie County do not have adequate space to provide median dividers at the approaches. The installation of quad gates seems to be the logical solution to provide for safety. However, there are concerns about who will pay for the additional gates and safety improvements.

- There are concerns about drainage impacts from raising the height of the approach roads at crossing locations.
- How will the bridge crossings be handled? Will additional tracks be placed on the existing bridges?
- Can Taylor Creek Bridge be raised higher to provide for water (boat) traffic underneath?
- Will the railroad bridge at Avenue “C” be replaced to accommodate two tracks? The existing bridge does not appear to be wide enough to fit two (2) parallel tracks. Will AAF perform work outside of the railroad right-of-way, to address drainage impacts resulting from raising the approach roadways at crossing locations? Will annual lease fees to Cities and Counties be increased as a result of the new improvements at railroad crossings?
- Some of the railroad crossings are privately maintained. These private crossings are critical for providing access. However, there is concern about who would pay for improvements to the privately maintained crossings.
- If Intersection signal improvements are needed for roadways located immediately adjacent to the railroad crossings (outside of RR right-of-way) will AAF help to pay for these costs?
- Pp S-8 and S-9 detail the methodology for studying the transportation effect on local roadway networks. Using the two largest arterials, by volume, for any County may not sufficiently capture the effect on roadways that will be impacted by the additional train crossing wait times.
- Page S-2 states stormwater ditches will be modified along the corridor, but in many locations, there are no existing stormwater ditches and the proposed improvements may preclude the ability to place any stormwater treatment areas in FECR right of way.
- It is noted that St. Lucie County employment data is absent from Table 2.3-4 on page 2-8.
- Although specific information is not provided, it is noted that many of the purported hardships indicated as eliminating factors for utilizing the CSX route (sharing common resources between freight and passenger, operational agreements, etc.) are still required along the FECR route (pp 3-4 and 3-5).
- St. Lucie County was provided 30% plans showing 3 tracks from south of St. Lucie Lane north to the Indian River County line. Page 3-35 does not indicate this location of proposed third tracks along the corridor.
- It is indicated that the two bridges in St. Lucie County (Moore’s Creek and Taylor Creek) will be either retained or rehabilitated. St. Lucie County has concerns that AAF is missing the opportunity to replace and upgrade the Taylor Creek Bridge. This bridge has a very low clearance over the water and is the primary obstruction to navigation for points upstream of the bridge.
- The ridership estimate methodology contained in the DEIS would require additional analysis beyond the expertise of staff at this time, but appears questionable given the current Amtrak ridership values presented.

- The land use for St. Lucie County is described as low density residential and undeveloped lands. It must be noted that the FECR corridor runs directly thru downtown City of Fort Pierce, which has significant commercial, industrial and much more intensive uses than “low density residential”. Significant negative effects would be borne upon these uses by the additional rail trips.
- Discrepancies in the listed number of at-grade crossings are found throughout the report. As an example, Table 4.1.2-3 lists 21 crossings for St. Lucie County, while Table 4.4.4-1 lists 27, and Table 5.1.2-4 lists 20.
- Discrepancies in the average freight train speed thru the County were found throughout the report. Table 4.1.2-4 has lower average speeds than the data presented in Table 3.3-9. Furthermore, the listed source for Table 4.1.2-4 data does not exist within this report. Utilizing these lower numbers artificially inflates the existing time of closure at any given crossing within the County.
- The DEIS assumes in section 5.1.2 that there will be “no significant impact to transportation as a result of this project”. The section goes on to further state “no significant adverse impacts would occur if the future LOS is D or better, and if the LOS below “D” does not deteriorate”. By the report’s own definition, the reduction in levels of service at both at-grade crossings studied for St. Lucie County will result in significant adverse impacts.
- Many of the at-grade crossings are the sole access point to neighborhoods, and will create a life safety concern with the additional times of closure.
- The Average Annual Daily Traffic (AADT) utilized for the evaluation is dated and far lower than current traffic counts. It is of note that the two greatest impacted roadways in St. Lucie County (Seaway Drive and North Causeway) are hurricane evacuation corridors and the primary routes to Lawnwood Regional Hospital for the residents of North and South Hutchinson Island. Seaway Drive currently operates at a level of service (LOS) D and North Causeway currently operates at LOS B.
- The analysis studied for 3 train crossings per hour is not the not indicative of the likely worst-case scenario, as indicated on page 5-7. Further analysis should be performed for the most restrictive case to determine actual impacts.
- It is noted that of the entire North-South Corridor, both intersections in St. Lucie County will suffer the greatest increases in delay time with no direct benefit to the community.
- The FDOT has programmed the north causeway bridge for replacement in 2019. How will the increase of the tracks along the corridor be integrated into the bridge improvements?
- The addition of two tracks along Seaway Drive and North A1A would not permit sufficient room for a large vehicle to stage between the traffic signal and the tracks, thereby increasing the probability of an accident. How will this be mitigated?
- On average, more than 400 fatalities per year occur as a result of pedestrian and train interaction. In a location such as St. Lucie County, with a greater distribution of elderly and low-income population, what steps will be taken to counteract the potential interaction?

- The tabulated substantial, negative fiscal impacts to the local maritime industry contained in the DEIS would require additional analysis beyond the expertise of staff.
- The DEIS states that there will be no adverse impacts to public health and safety. The statement does not appear plausible for the areas such as the Treasure Coast that will receive no direct benefit from the added train trips thru and across local roads.
- Upgrades to road crossings to create sealed corridors will require additional maintenance costs, diverting funds from competing roadway and other maintenance liabilities.
- The statement that the project would “benefit elderly and handicapped individuals by providing a transportation option that will enhance mobility and livability in their communities” should be qualified, as St. Lucie and Martin Counties have the greatest percentage of elderly residents, and will not be served by the project.

Water Quality Division – Public Works

- Ch. 1: 1.2.3. Second track roadbed clarification/detail. What physical construction improvements to land will be completed to build the second track? Is this an increase in impervious surface over existing conditions?
- 1.4. There is no mention or description of the Multi-Sector Generic Permit for Stormwater Discharges Associated with Industrial Activity for the VMF issued by DEP (NPDES Stormwater permit.)
- Ch. 2: Table 2.3-4 is missing SLC census data.
- 2.3.5. Pursuant to the 2025 Florida Transportation Plan, the Florida Rail Project Plan (2009 referred) is to be updated every two years. Is a more current plan available? Is there a more current Investment Element of the plan (after 2010?)
- Ch. 4: 4.1.3.1. How was the month of January determined to be the “peak season for vessel traffic?” It is generally believed the summer months will yield the highest vessel counts and therefore should be used for calculations.
- 4.3. Effects to Savannas State Preserve? No mention of this State Park in the Affected environment.
- Table 4.3.5-4. ‘Counties’ column is incorrect (St. Lucie is not shown) so that water bodies are erroneously listed in the wrong counties. Moore’s Creek is in St. Lucie County and Warner and Unnamed Creeks are in Martin County – not Indian River. Also, Taylor Creek is missing (in St. Lucie County.)
- Table 4.3.4-2 has an error in that St. Sebastian River is in Brevard County.

Emergency Management & Solid Waste Departments

Most of the draft EIS is based on the FRA Environmental Assessment (EA) for Phase I (West Palm Beach to Miami) completed in 2012. St. Lucie is included in broad terms as part of the North – South corridor but potential impacts to St. Lucie County were not specifically studied. The 2012 EA concluded there were no Findings of Significant Impact (FONSI). There will be no EA done for phase 2.

Below are the sections and response from Public Safety:

Pages 4-47 – 4-51 - Hazardous Materials and Solid Waste Disposal: AAF is planned for passenger rail service not transport of large quantities of hazardous materials such as ammonia. The proposed Siemens Charger Diesel-Electric locomotive will have a diesel fuel capacity between 1,800 – 2,200 gallons. Current Florida East Coast GE locomotives have a significantly larger diesel fuel capacity at 5,000 gallons.

The possibility of a wider spread of diesel fuel due to a high speed crash with a fuel tank rupture could create a larger contaminated area resulting in a longer clean-up operation. Other additional concerns regarding hazardous materials due to AAF's proposed passenger service through St. Lucie County are not anticipated.

Pages 4-115 – 4- 127 - Public Health & Safety: The DEIS indicated that no accidents occurred at any at-grade crossings in St. Lucie County between 2008 and 2012. The addition of 32 trains per day at much higher speeds than FEC trains will likely create more opportunity for at-grade crossing accidents. It is recommended that all efforts be made to have AAF upgrade or improve all crossings. The proposed project will only benefit AAF and do nothing to lower the chance of accidents. No analysis was performed on the potential increase in accidents from additional trains moving at much greater speeds through heavily developed areas of the County. Passenger train derailments often result in Mass Casualty Incidents (MCI). A high speed derailment in any populated area of the County, especially downtown Fort Pierce would likely result in a large number of casualties.

Pages 5-58 - 5-62 - Hazardous Materials: See response to Chapter 4 viii

Environmental Resources Department

- It would be beneficial to request Environmental Resource Permits (ERP)/ACOE permit applications by County to clearly separate impacts to SLC and which mitigative measures presented in the plan would be implemented in SLC. This method would allow clear designation of agency oversight such as USFWS Jacksonville and USFWS Vero jurisdictions.
- It is unclear if listed species surveys or any ground reconnaissance occurred in SLC.

Air Quality

- St. Lucie County is identified in the DEIS as an attainment area for all criteria pollutants (i.e.; measured pollutants within the National Ambient Air Quality Standards for Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter, Airborne Lead, & Greenhouse Gases).
- The primary type of emissions contributing to air pollution in the Project Study Area is mobile source emissions from combustion engines such as automobiles. Table 4.2.1-3 shows existing mobile source emissions for 2008, the most recent year available.
- The report states that the air quality in the region would improve through the reduction of vehicles miles travelled as auto passengers are diverted to the new rail system.
- While the data provided do not appear negative, ERD is not fully qualified to review the air quality data presented nor evaluate the impacts that will result from this project. However, since there will not be a station in St. Lucie County to contribute to a decreased air pollution, there could be a substantial increase in the amount of exhaust fumes created by cars idling at crossings an additional 32 times per day.

Noise & Vibration (there appears to be no reference to impacts on the Savannahs)

- Noise and vibrations from this project should be considered in relation various factors such as disruption to foraging and nesting habits of listed species.
- Vibrations to radiate out a projected 600'. Gopher tortoise burrows within this distance may be compromised as a result of the vibrations.

- Noise will negatively impact the enjoyment of the County's Natural Areas.
- Noise and vibrations may impact the enjoyment and integrity of the 30 foot tall observation tower currently under construction at the Walton Scrub Preserve, located very near the railroad right-of-way for optimum viewing of the Savannas landscape and the Indian River Lagoon.

Climate Change - Water Resources

- The DEIS states the project may impact waters of the United States within the jurisdiction of the United States Army Corps of Engineers (USACE) under its authority granted by the Clean Water Act. USACE provide special expertise with respect to environmental issues concerning the potential discharge of dredged or fill materials into waters of the United States or the construction of any structure over navigable waters of the United States. USACE will also provide FRA with all EIS documentation requirements that are unique to its Regulatory Program outlined in 33 CFR part 325 Appendix B (i.e., which would not be addressed by FRA in FRA's implementation of its NEPA requirements). An example of a requirement that is unique to the USACE Regulatory Program and may be applicable to the USACE's participation as a cooperating agency is the identification and analysis of the Least Environmentally Damaging Practicable Alternative (LEDPA) and Public Interest Review as a requirement for compliance with the Section 404 permit program. USACE will complete its own Record of Decision including a Clean Water Act •] Section 404(b)(1) determination, public interest evaluation, R&HA Section 10, and engineering analysis to determine whether to issue authorization pursuant to R&HA Section 14 (33 USC 408) permit applications. According to the report, AAF has not yet submitted its application for Section 404 authorization to the USACOE and USACOE analysis and review will be part of a record of decision following publication of the Final EIS.
- BMP's and mitigation measures during construction will include sediment control via turbidity curtains and silt fences and development and implementation an rosion and Sedimentation Control Plan in EFH.

Essential Fish Habitat

- Project will require USACOE CWA Section 404 Permit/ Rivers and Harbors Act Section 10 and Section 14 Permit U.S. Fish and Wildlife Service Endangered Species Act as well as Section 7 concurrence National Marine Fisheries Service

Endangered Species Act Section 7 concurrence/ Magnuson-Stevens Fishery Conservation and Management Act – Essential Fish Habitat.

- NMFS commented early in the review process that they want AAF to approach in a stepwise process: Step 1- identify if there are salinity control structures downstream of any of the bridges- if there are we can eliminate those from consultation for Essential Fish Habitat; Step 2- identify the habitat at the bridges- mangroves, seagrasses, naturally occurring oyster habitat will require mitigation; Step 3- narrow list of fish down based on the habitat present at our sites and address them in the EFH (EFH vs. ESA- Essential fish habitat assessment is for marine fish and impacts will need to be addressed in the EFH, but mitigation is not required. Endangered Species Act Biological Assessment will be required for smalltooth sawfish and Johnson's Seagrass if determined to likely be impacted- The trigger for consultation for small tooth sawfish is impacts to red mangroves- the amount of impacts will trigger the formal consultation- however, by adhering the smalltoothed sawfish construction conditions impacts may be minimized). EFH consultation with NOAA is required if there are impacts to Johnson's Seagrass. Mitigation options for seagrass are limited. The survey period for seagrass ends September 30- to confirm presence/absence.
- Project will require Florida Department of Environmental Protection Clean Water Act Section 401 Water Quality Certification - Environmental Resource Permit; Sovereign Submerged Lands Approval for bridges/ Coastal Zone Management Act.
- The St. Lucie County portion of the WPB-Cocoa corridor crosses two surface waters. Table 4.3.1-2 identifies them as “North Coastal (St. Lucie/Loxahatchee)” and “Moore Creek” and identifies both as impaired.

Drinking Water – Ground Water

- The Florida Safe Drinking Water Act (Fla. Stat. §§ 403.850 – 403.8911) ensures that the existing and potential drinking water resources of the state remain free from harmful quantities of contaminants. Local officials of each county have been encouraged to handle pollution problems within their jurisdiction on a cooperative basis with the state. St. Lucie County has a wellfield protection ordinance. The report states there are no sole source aquifers in SLC. There are three hydrostratigraphic units in SLC including the surficial aquifer system, intermediate confining unit, and the Floridan aquifer system.

Wetlands

- For the purposes of the EIS preliminary jurisdictional determinations will treat all waters and wetlands, which would be affected in any way by the proposed activity as if they are jurisdictional waters of the United States.
- ERD has a concern that there is a potential for construction to interrupt the natural water seepage flowing from the Atlantic Coastal Ridge to several of our Natural Areas including D.J. Wilcox and Harbor Branch. These flows maintain hydroperiods of wetlands within those preserves.

Floodplains

- Portions of the Project Study Area of the N-S corridor (472 acres) are within the 100-Year Floodplain. No details are provided for St. Lucie County. On Page 4.3.4-2 it is not possible to analyze St. Lucie County section of map.
- Table 4.3.4-2 inaccurately shows the St. Sebastian River floodway crossing in St. Lucie County.
- DEIS identifies Taylor Creek as a Federal Flood Control Project.

Biological Resources and Natural Ecological Systems

- The existing tracks already cause habitat fragmentation and wildlife movement.
- Creative solutions such as wildlife under- and overpasses and fences should be implemented as part of this project.
- SLC has the following preserves/wildlife corridors: Harbor Branch Preserve (SLCERD), Indrio Scrub Preserve (SLCERD), D.J. Wilcox Preserve (SLCERD), St. Lucie Village Heritage Preserve (SLCERD), Walton Scrub (SLCERD), Savannas Recreation Area (SLCP&R), Savannas Preserve State Park (FDEP), as well as Heathcote Preserve/Indian Hills Linear Park (SLC/FP).
- The report states EFH and Habitat Areas of Particular Concern (HAPC) are located within the N-S portion of the study area.
- Page 4-89. Table 4.3.5-4 should include areas within St. Lucie County (Taylor Creek, Moore's Creek). Is the Moore's Creek shown under Indian River County, the Moore's Creek in St. Lucie County?
- The report states that desktop surveys identified 38 plant and animal species that are both federally and state listed and 36 listed only by the State. The eight

Natural Areas in SLC affected by the project potentially support listed species. It would be beneficial to break up the ERP/ACOE permit application by County to clearly separate issues such as jurisdictions, impacts, mitigation efforts. Secondary and cumulative impacts to wildlife including noise, vibration, habitat fragmentation, etc. must be thoroughly addressed in the biological assessment. USFWS suggests clearly outlining avoidance and minimization first, then mitigation for impacts to wildlife.

- Page 4-99. Table 4.3.6-3 should include Savannas Mint, *Dicerandra immaculata* var. *savannarum*.
- Florida Scrub-Jays - Were scrub-jay surveys conducted in the SLC portion of the AAF project right-of-way within the areas of suitable scrub-jay habitat during the designated survey season for this species during early spring (especially March). Will USFWS require a permit and best management practices for this species? The project is likely to result in increased risk of scrub jay strikes with the frequency and speed of the train. Adding the new rail will move the trains closer to the adjacent scrub habitat. The project should consider high fencing around the tracks to prevent scrub-jays from colliding with the trains however, this may impede movement of other species. So there should be space at the base of the fence to facilitate movement of species such as gopher tortoises.
- Eastern Indigo Snake - Will USFWS require Standard Protection Measures for the Eastern Indigo Snake including information signs to be placed in areas of Eastern indigo snake habitat along the AAF project right-of-way during times of construction. These signs are to serve as an educational tool to make construction workers aware of the snake's appearance and potential presence within the area. If snakes are observed, these signs instruct workers to, cease work and contact the environmental consultant and the USFWS office. Any dead snake that is discovered must be put on ice and again contact the USFWS.
- Wood stork – There are reportedly no wood stork rookeries located within the AAF project right-of-way. Project footprint is within 2,500 ft. of known colony. Unavoidable impacts to wetlands will be mitigated through purchase of credits at a USFWS approved mitigation bank. Will there be impacts to suitable foraging habitat? If so, will these impacts be mitigated?
- West Indian Manatee - Will all in-water work be conducted in accordance with standard manatee conditions?
- Gopher Tortoise (Candidate Species) - Species may be federally listed in the near future. FWC compliant survey and relocation will be conducted prior to construction. The project may require Florida Fish and Wildlife Conservation Commission Gopher Tortoise Permit. Page 7-13, Paragraph 7.2.11.7. Note:

Impacts within 25 feet of a gopher tortoise burrow (even if off-site) may also require relocation.

- Audubon's Crested Caracara - Were land use and aerial photograph evaluations of habitat conducted? Is there nesting activity along the corridor?
- Bald Eagle – The report states that bald eagle was observed during field surveys, along with suitable nesting habitat. Where? Are any known bald eagle *nest* located near the project?
- Will USFWS require manatee construction conditions, small tooth sawfish construction condition, indigo snake construction conditions, and sea turtle construction conditions (for work areas where these species may occur)? By adhering to these conditions does the USFWS assume not likely to affect? Exactly where in the Project Study Area will these measures be required?
- BMP's and mitigation measures during construction will include: siltation/turbidity barriers made of material that would not entrap/entangle species, and would not impede species movement, water vessels would operate at no wake/idle speeds at all times and in water depths where the draft of the vessel provides less than a 4-foot clearance from the sediment, vessels would follow routes of deep water, personnel would be instructed in the potential presence of threatened and endangered species in the vicinity, personnel would be advised of the civil and criminal penalties for harming species, if a manatee comes within 50 feet of the construction area or barrier, activities would cease, including vessels being shutdown, until the animal has moved on its own volition beyond the 50-foot radius of the construction operation, signs regarding species would be posted before and during in-water construction activities, feeding sites shall not be subjected to water management practices, construction would comply with the Bald Eagle Management Plan, a Bald Eagle Disturbance Permit will be obtained, eastern indigo snake monitoring report would be submitted to the appropriate federal and local field offices, construction activities would occur during daylight hours in areas that might be visible from any sea turtle nesting beaches, construction completed from the water would utilize floating barges and turbidity barriers, use bubble curtains during pile driving, and prior to ground disturbing activities, Florida Fish and Wildlife Conservation Commission- compliant gopher tortoise surveys shall be completed by a qualified gopher tortoise agent.

Cultural Resources

- Page 4-132. Table 4.4.5-14 should include Ft. Pierce "fort site" and mound (8SL3). Artifacts have been reported immediately west of the tracks, and it is

presumed that a large mound system existed prior to construction of the railroad. Any construction activities may unearth archaeological resources.

- Page 5-140. Include discussion of Ft. Pierce “fort site” and the proposed impacts to the existing site as well as potential artifacts within the boundaries of the project immediately adjacent to 8SL3.

Recreation and other Section 4(f) Resources

- Section 4(f) resources are identified as parks, recreation areas, or wildlife and waterfowl refuges of national, state, or local significance that are available to the public. A park or recreation area is afforded federal protection under Section 4(f) if:
 - It is publicly owned, meaning the property is owned and operated by a public entity, or the public entity has a proprietary interest in the property, such as an easement;
 - It is open to the public for visitation for more than a select group of the public at any time during normal hours of operation;
 - The primary purpose of the property is recreation (lands used primarily for non-recreational purposes but that host recreational activities do not have recreation as a primary purpose); and
 - It is significant as a park or recreation area, meaning that the resource plays an important role in meeting the park and recreational objectives of the community, as determined by the official with jurisdiction over the property.
- SLC has the following preserves that should qualify as a 4(f) resource: Harbor Branch Preserve (SLCERD), Indrio Scrub Preserve (SLCERD), D.J. Wilcox Preserve (SLCERD), St. Lucie Village Heritage Preserve (SLCERD), Central Open Space (SLV), Old Fort Historic Site (FP), Walton Scrub (SLCERD), Savannas Recreation Area (SLCP&R), Savannas Preserve State Park (FDEP), as well as Heathcote Preserve/Indian Hills Linear Park (SLC/FP).
- None of SLC’s parks or other recreational facilities have been subject of LWCF Act grants, therefore would not be protected under Section 6 (f)(3).

Visual and Scenic Resources

- The proposed project will have a visual impact on all of the natural areas it will pass through.
- Most notable is impacts to the 30 foot tall observation tower currently under construction at the Walton Scrub Preserve, located very near the railroad right-of-

way for optimum viewing of the Savannas landscape and the Indian River Lagoon.

Natural Environment – p. 5-75 – 5-121

- The DEIS report states, “the project has the potential to adversely affect land use, transportation (particularly traffic at-grade crossings), noise and vibration, water resources, wetlands and floodplains, biological communities, and protected species.” We agree with this statement. However, the report does not address the necessary mitigation measures required to reduce the potential adverse effects.
- Water quality and quantity concerns associated with reconstructing the railbed to add a second track will be addressed as part of the FERP process.
- The report states BMP’s will be implemented but it does not identify which BMP’s or where they will be implemented.
- The report states negligible impacts to water quality will occur but it does not elaborate as to where or what those impacts are or what qualifies as negligible.
- The report states the project will pass through several wellfield protection zones through several counties including SLC. It states the project will comply with local ordinance for protection. What will trigger our involvement?
- The project will result in impacts to the aquatic environment. The report discusses numerous direct and indirect impacts. What will specifically occur in SLC?
- Habitat Fragmentation – During the November 2013 AAF meeting at the Fenn Center with environmental lands managers (County, State, etc.), there was concern about extra RR tracks that would only strengthen the fragmentation occurring to gopher tortoises as well as increase mortality rates. Gopher tortoises sometimes become trapped in between the tracks. Can small platforms be installed every 100’ that would allow gopher tortoises to escape from between the tracks? A consulting engineer for AAF seemed interested in coming up with a solution. The area between the City of Fort Pierce to the Savannas Preserve SP and JDSP were mentioned. There is some mention given to gopher tortoises on p. 5-115, paragraph 2. (DA)

Mitigation Measures and Project Commitments

In summary, there is insufficient information provided for staff to complete a comprehensive review of this project. Staff would request copies of field surveys conducted in St. Lucie County and recommends the Environmental Resource Permits (ERP)/ACOE permit applications for the project be separated out by County. This

method would allow staff to clearly distinguish impacts, BMP measures and mitigation specifically relevant to SLC.

St. Lucie Village

It is noted that on PDF page 134 (4-3) the discussion of existing land uses references incorporated municipalities that AAF goes through, but doesn't reference St. Lucie Village. Moreover, it needs to be emphasized that there is no exit other than these crossings in many St. Lucie Village neighborhoods.

Similarly, Table 4.1.1-1 (pg. 135, 4-4) lists land use plans of various counties and municipalities, but not the Village.

At page 234 (4-103), includes another reference to passing through numerous incorporated municipalities - - not including St. Lucie Village.

On page 256 (4-125) local government contacts are listed concerning locally designated cultural resources, however there is no contact for St. Lucie Village.

Page 263 (4-132) does designate Fort Capron as a historic resource in Table 4.4.5-14.

Page 272 (4-141) does include St. Lucie Village Heritage Park in Table 4.4.6-2.

Regarding the triple track, it is noted in Appendix 3.3-B-4, and that the trains turn onto and off of the center siding at sharp angles, implying a stopped or nearly stopped train.

Fort Pierce Police Department

Fort Pierce has some grave concerns about accidents at any of the downtown crossings: Seaway Drive, Citrus Avenue, Avenue A & C, Orange Avenue, not to mention North Causeway, Savannah Road, and Midway. Any accident at these locations would certainly a devastating impact on downtown (life, property and economic) for an extended period of time.

St. Lucie County Fire District

Please see the attached resolution by the district opposing the project.

Cc: Howard N. Tipton, County Administrator
Dan McIntyre, County Attorney
Robert Bentkofsky, Assistant County Administrator
Don West, Public Works Director