



CITY OF FORT PIERCE

PLANNING DEPARTMENT

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HISTORIC PRESERVATION ♦ URBAN DESIGN ♦ URBAN FORESTRY ♦ ZONING

TO: Treasure Coast Regional Planning Council and the Federal Railroad Administration

FROM: Rebecca Grohall, Planning Manager

RE: City Of Fort Pierce Staff Comments on the Draft Environmental Impact Statement For The All Aboard Florida Project

DATE: November 14, 2014

Purpose

The purpose of this report is to outline Fort Pierce City staff comments in response to the recent Federal Railroad Administration (FRA) release of their Draft Environmental Impact Statement (DEIS) for the All Aboard Florida (AAF) Orlando to Miami Intercity Passenger Rail Project. The FRA is required by the National Environmental Policy Act (NEPA) to analyze the potential environmental impact that may result from this project. According to NEPA, the intent of a DEIS is to facilitate public discourse, allow federal agencies to study environmental impacts and assess alternatives, and inform decision makers and the public. The study evaluates the project comprehensively, but focuses primarily on Phase II West Palm Beach to Orlando. Overall recommendation is further comprehensive analysis needs to be completed with identified deficiencies being addressed, so that a complete understanding of increased train travel can be obtained.

The following report is divided into five major sections, Transportation, Land Use, Noise, & Vibration, Environmental Conditions, Hazardous Materials and Solid Waste Disposal, and Social, Economic, & Community Impacts, these sections correspond to major sections in the DEIS report.

Transportation

Roadway Network and Grade Crossings:

The proposed All Aboard Florida Orlando to Miami Intercity Passenger Rail project is expected to run 32 passenger trains per day. In addition, Florida East Coast Railway (FEC) freight train trips are expected to increase from 14 to 20, thus approximately 52 trains per day would run on the FEC rail line, by 2016. This is a tremendous increase in train activity for the Fort Pierce area. A rapid increase such as this is obviously a concern to the community. Below are the major concerns that have been identified regarding the transportation section.

Road Analysis- Currently train routes intersect vital thoroughfares for the community. These roads include:

- Seaway Drive
- Orange Avenue
- Avenue A
- Avenue D Fisherman's Warf
- North Causeway
- Avenue C (A.E Backus Ave)

Undoubtedly, a rapid increase in trains per day will negatively affect the City's roadways. FRA did analyze traffic operations at grade crossing sections (Appendix 3.3 Grade Crossing Details); however, they only analyzed the largest volume arterial roads. Specifically for Ft. Pierce, they studied North Causeway and Seaway Drive. These are major thoroughfares, connecting the mainland to the islands, but they are not the City's only major roads. Consequently, without complete analysis of all grade crossings, we contend the report is inadequate and are requesting that AAF complete a full analysis of all grade crossings.

Level of Service- Reviewing the information available in the report estimated crossing grade for North Causeway during normal cycle is expected to be at Grade A. When freight trains cross Level of Service will be at Grade C and when Passenger trains cross level of service will be at Grade B. Weighted average is expected to be at Grade A. This is above minimum level of service standards, which is a D or better.

In contrast, the estimated crossing grade for Seaway Drive during normal cycle will be at Grade A. When freight trains cross level of service will be at Grade F and when Passenger trains cross level of service will be at Grade F. Weighted average is expected to be at Grade B. The change to level of service for Seaway Drive is alarming. However, it is unclear by the report why this crossing will fall below acceptable grade levels due to train traffic.

While the report offered no suggestions as to why Seaway Drive would operate at LOS F, perhaps the answer is at the Avenue C Bridge. The bridge is a single track; presently daily operations often necessitate trains to switch to allow others to bypass. Added passenger service will presumably increase the need for railroad switching in this area. The report does not clearly state what actions will be taken to improve this crossing, in the report there is no indication FEC or AAF will be updating this bridge. In order to maintain level of service above standard grade during crossing, it will be necessary to upgrade this bridge and now would be the best time to take action.

Traffic operations- The DEIS report of North Causeway and Seaway Drive states these crossings will individually remain above acceptable level of service, but does not provide impact analysis of when trains cross multiple arterial roads simultaneously. In the case of multiple crossing closures, it is reasonable to predict further delays, as well as increase in road traffic on minor roadways which do not have the capacity for high volume traffic. The report does convey the increase in trains will cause additional closure events, but does not provide further research to understand the impact of the closures. In the report it states since passenger trains are shorter in length than existing freight, the additional impact from freight and passenger will be minimal. However supporting detail is vague and the report never addresses the overall impact of additional freight and passenger trains.

Moreover, the report does not provide any analysis on bicycle and pedestrian level of service. For the Ft. Pierce area this is important to identify, because of the City's growing alternative transportation users. Given the report's incomplete analysis of level of service, the report does not provide a full picture of the true impact of increased train activity at the City's grade crossings.

Upgrades and Maintenance- The City is concerned about the initial cost and future maintenance of crossing guards and surrounding area. Not only would the City's roadway crossings, which include gates, lights, signalization, medians, and other items, have to be upgraded, pedestrian crossings will need to be improved as well, which can include sidewalks, pedestrian guards and signs, pavement markings, and raising the approach to tracks. Supplementary documents from AAF state they would cover costs for upgrading and maintenance associated with double tracking only, not including quiet zones upgrades. At present it is unclear what upgrades and maintenance will be covered by AAF, the report did not include this information.

In addition, upgrading and maintenance of two bridges, Taylor Creek and Avenue C, is also a concern for the City. According to the DEIS report, the Taylor Creek bridge would be rehabilitated, though details were not presented in the report. Avenue C Bridge however was not discussed at all in the document. The AAF project

will increase the number of trains per day, and as a result frequency of road closures will also rise. A result, road closures will impact shifts in traffic patterns. Commuters will presumably utilize Avenue C as well as Citrus Avenue overpass more frequently to bypass the increased train traffic.

As previously stated the Avenue C Bridge (Figure 1), an older single track bridge, needs to be upgraded to assist with train and road traffic flow. Since it is a single track, only one train can cross at a time, thus train switching before or after the crossing is necessary. This creates traffic flow problems at crossing intersections. Consequently, we will see traffic build ups at crossing intersections, such as Seaway Dr., Avenue D, Avenue A, Cedar Place, Avenue C, and the Citrus overpass.



Figure 1: Avenue C Bridge



Figure 2: Citrus Avenue Overpass

Traffic increase on Citrus Avenue overpass (Figure 2) is also concerning. If the AAF project moves forward the overpass will require inspection. Additional traffic, an expected result from the AAF project, will put increased stress on the overpass. AAF should work with the City to assist with upgrading and maintaining the overpass. Their assistance will help ensure the overpass meets safe load carrying capacity standards. For the safety of travelers going over the train tracks on Citrus Avenue Overpass, it is imperative that it undergoes rehabilitation.

Speed- The DEIS report estimates train speeds may be in excess of 110 miles an hour at the Savannah Road crossing. Speed in the downtown area is expected to be between 40- 60 miles per hour. Trains moving through City center at those speeds pose obvious concern for community and wildlife safety. The report acknowledges a sealed corridor will be in place, but does not provided detailed information on the type of sealed corridor. An 8ft chain link fence would not be aesthetically pleasing, nor is it consistent with our code standards for our historic district and redevelopment areas. Since the FEC rails run through the middle of our community the material of the sealed corridor must be compatible with the aesthetics in our area. This is to avoid disruption to the look and feel of our areas. With trains moving through our community on a regular basis, an unattractive, sealed corridor will create the feel of a barrier between neighborhoods.

Marine Navigation:

The DEIS report states the Taylor Creek railroad bridge would be rehabilitated. However, no details were provided. In 2007, the Taylor Creek Charrette was completed. At that time it was recommended to replace the current Taylor Creek Bridge with a vertical lift style bridge. The Treasure Coast Regional Planning Council team, during this time met with an FEC Representative, whom deemed a Vertical Lift bridge feasible and the preferred option (TCRPC, 2007).

Replacing the bridge would allow boats to travel from the Indian River Lagoon through Taylor Creek and spurring economic development. A major facet of the Taylor Creek Charrette was the discussion of expanding marine industry opportunities. To accomplish expansion of the marine industry it was identified improvements of the bridge were necessary. If the bridge were to be modernized to a vertical lift bridge it would not only update an old outdated bridge, but also be a catalyst for redevelopment, by allowing for marine navigation into the area.

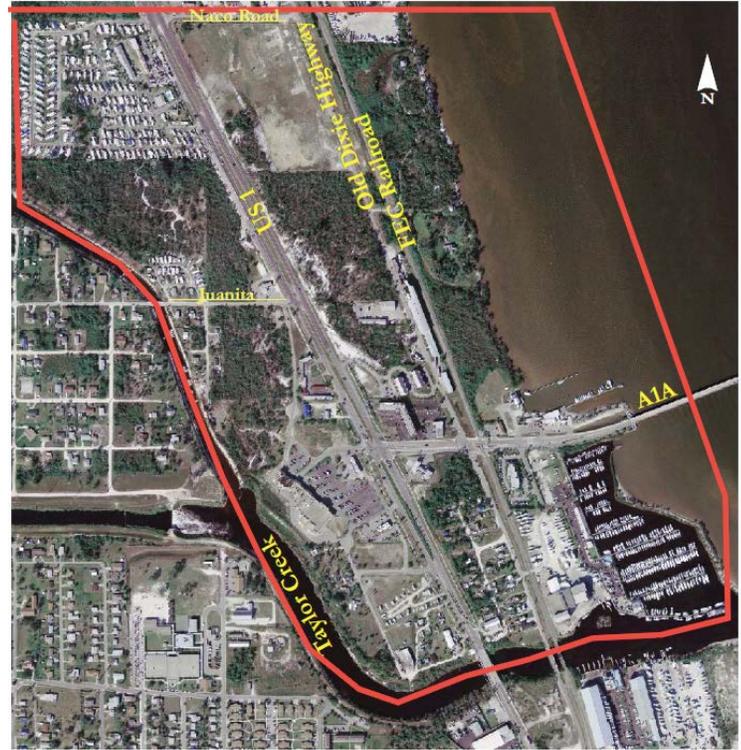


Figure 3: Taylor Creek Charrette area.

Other Transit:

The City wants to maintain our multi-modal connectivity and optimal level of service. However, the DEIS report did not speak to this issue specifically for Fort Pierce.

Bicycle/ Pedestrian:

Ensuring safety near the tracks is another concern, especially for residents who travel by alternative transportation modes such as walking and bicycling. The FEC rail line runs through Ft. Pierce's lowest income areas (Census tracts 380100, 380200, 381000) the residents in these neighborhoods are more likely to use alternative forms of transportation and have higher probability to travel back and forth over the tracks. With the increase in trains per hour, risk for these travelers will greatly increase. Safety of these travelers is very important to the community, the DEIS does not provide in depth information on its plans to create safe pedestrian areas near and around the rails.

Public Safety and Emergency Response:

Consistent with impediment of traffic operation level of service, is the obstruction of connectivity between major areas of the City. While once considered a benefit when passenger rail stopped in the community, the train is now seen as a disadvantage. The rail line currently cuts through major economic hubs and divides the mainland from North and South Hutchinson Island. The City sees the influxes of trains passing through the community as a hindrance to ensuring levels of connectivity between neighborhoods as well as between the mainland and the islands. Maintaining connectivity is important, especially for ensuring our emergency responders, Fire, Rescue and Police response, can respond without hindrance. The DEIS does not address the impact the additional trains will have on our emergency responders. Additionally, in the event of an evacuation be it manmade or natural, how would the FEC respond? Would they stop the trains? Do they have an evacuation plan in place? Furthermore if these trains were used to evacuate other communities in Florida, what is the FEER response to the

negative impact it would oppose on our community. All these questions are not sufficiently answered by the report.

Recommendations:

- Analyze of all our grade crossings, so that we have sufficient information on the impacts to the community;
- Provide further information regarding bicycle and pedestrian level of service;
- Implement adequate safety measures for pedestrian and bicycle areas around and on the track;
- Update crossings, ensuring they are ADA compliant;
- Implement improvements to Avenue C bridge;
- Implement improvements, such as vertical lift, to Taylor Creek bridge;
- Provide detailed information of the sealed corridor ;
- Research multi-modal connectivity and level of service in the Fort Pierce area; and
- Provide plans demonstrating how evacuation procedures will be impacted by trains, especially for trains that may be stopped for switching and blocking evacuation routes.

Land Use, Noise, & Vibration

Existing Land Use:

The description of St. Lucie County as “low density and undeveloped lands” is a clear misrepresentation of our area. The City of Fort Pierce, established in 1901, is one of the oldest communities on the east coast of Florida. Ft. Pierce today remains a vibrant community with a rich history that includes a close relationship with the FEC rail line. The City became an important location for the rail line when Henry Flagler designated Fort Pierce as a division point in 1911. Earning this designation facilitated exponential growth for the City, as well as establishing Fort Pierce as a pivotal location for freight train operations. Even though Fort Pierce is a significant location for the FEC, land use information provided within the DEIS report relating to Fort Pierce was incomplete and inaccurate.

Noise:

Noise pollution, already a negative externality currently impacting our residents, is one concern Ft. Pierce wants to be proactive in mitigating. Noise pollution includes noise generated by wheels, flanging, idling, whistles blowing, and railroad switching. With additional trains running through the middle of the community, increased noise will unquestionably bolster the negative externalities already impacting residents, something the City is very concerned about. The DEIS report did not adequately address the negative externalities associated with increased train trips. The report addresses existing conditions, but we contend the report did not sufficiently forecast future conditions. It is important to understand fully the noise impacts, so that plans can be made for mitigation efforts.

Quiet Zones:

The possible need and costs to the municipality for Quiet Zones or other noise mitigation alternatives is a concern for the City. If the AAF project moves forward and noise is an issue, it is recommended that the AAF upgrade all FEC crossings guards to meet Quiet Zone standards at their costs and not pass those costs onto Cities. Alternatively, if AAF does not fully fund Quiet Zones, and the City wishes to pursue them – Staff recommends that they join with other governments to work with the Treasure Coast Regional Planning Council in a joint application for funding.

Historical Structures and Districts:

The DEIS report currently does not specify how additional vibration will affect homes and business located near the FEC rail. A majority of housing and commercial stock in the City of Fort Pierce is located near the rail line. A fuller understanding is needed to evaluate the true consequence of vibration to our structures, since a majority

of our historically significant properties, both commercial and residential, as well as an entire community enclave, Edgartown, is located very close to the rail line. Many of these buildings were built between late 1900's to 1950. The report poorly conveys how the vibration will negatively affect these areas. Concerns regarding vibration on these older buildings are a great concern for the City. Three different historic districts are located throughout the FEC corridor: the Downtown Historic District, as well as the Edgartown Settlement and the Rivers' Edge Historic Districts. Additionally, numerous properties are on the National Register of Historic Places but not addressed – including the Sunrise Theater, Cresthaven/Boston House, Old City Hall, the Moore's Creek Bridge (aka "tummy tickle hill") and Old Fort Park. The Sunrise Theater may be part of the number of auditoriums listed that are impacted by noise and vibration; however they were presented as a number only without a corresponding list, it is impossible to determine what the impacts are to the theater both to the structure and to performances.

Along with vibration is the concern about the possibility of a sealed corridor. If a sealed corridor is to be built in the downtown, the City does not want chain link fence to be an option. Aesthetically it does not fit the look and feel of downtown nor is it allowed or compatible with the design standards. A chain link fence will be a hindrance to the City's redevelopment and historic preservation efforts. The FRA did not reach out to City staff to get a better understanding of the City's historic area, which calls into question their ability to evaluate the effects of vibration to these buildings. Chain link is not an allowed use in our redevelopment area, nor is it an allowed material in the historic areas.

Recommendations:

- Provide a more in-depth quantitative and qualitative evaluation on spill-over costs and negative externalities from noise;
- Provide further detailed research on impact of noise and vibration on historic structures; and
- Improve communication with City of Fort Pierce Planning Department staff.

Environmental Conditions

It's imperative that environmentally sensitive locations such as Savannah Preserve, Old Fort Park archeological site, Indian Hills Recreation Area, the Indian River Lagoon and other coastal waterways are not destroyed or in any manner damaged. Savannah Preserve is a State Park running through Fort Pierce and St. Lucie County comprised of environmentally sensitive land in freshwater marshes and is perhaps the largest single remaining piece of east coast savanna land. In addition to other environmentally sensitive lands adjacent to the tracks, the report does not address impacts to the migration corridors. Also missing is a discussion impacts to threatened and endangered species like gopher tortoises, indigo snakes, bobcats, scrub jays and numerous other birds, on the "protected species" lists. Nor does the report address impacts any of the protected plants that are on the state or federal lists. The DEIS report does not address in any detail on how train traffic will impact these areas, nor offers any mitigation measures to ensure these sensitive areas will be protected over time. Thus, the City contends the DEIS is incomplete in this section.

Recommendations

- Provide detailed impact analysis on our local environmental areas;
- Provide wildlife crossing areas through the use of culverts; and
- Provide detail environmental mitigation plans

Hazardous Materials and Solid Waste Disposal

Hazardous materials and solid waste disposal is not discussed except during construction period. This section is vague and does not give any substantive detail specific to any area. The report also is ambiguous about how they will handle mitigation efforts after construction period. How the AAF will prevent or mitigate any hazardous

material spills or solid waste leakage is unclear. Additionally, the report claims there are 337 potential contaminated sites, but does not discuss any details regarding any of the sites.

Recommendations:

- Provide detailed information on prevention and mitigation of hazardous material spills or solid waste leakage;
- Provide detailed information on where the contaminated sites are located; and if sites are located in our area provide plans of site cleanup.

Social, Economic, & Community Impacts

Environmental Justice:

The majority of minority and low income residents in St. Lucie County identified by the DEIS report live in Ft. Pierce. The City has been working toward improving the quality of life not only for these community members, but for the entire Ft. Pierce community. Increased train traffic running three times per hour will negatively affect the quality of life, resulting in lasting negative effects for the entire community. Although the report drew attention to the low income and minority census tracts, it failed to provide any research on passenger rail and social equity. They failed to address issues such as barriers to integration, taking of land, and health. Until this section of the DEIS report addresses those and similar issues, the section should be considered incomplete.

Economic Impacts:

The AAF project is expected to create spill-over costs. Negative externalities such as increased train noise and vibration, additional traffic delays, and an unattractive sealed corridor may spur direct and indirect negative economic impacts to the Fort Pierce community. Loss of investment in Historic Fort Pierce Downtown, real estate degradation of commercial and housing properties, and loss of tourists' dollars to the local area, have all been identified as most concerning to the City.

Fort Pierce and surrounding Treasure Coast communities will be absorbing all the costs with no benefits. Economically, the current proposed project does not benefit our local area. The DEIS report did not sufficiently discuss potential positive or negative economic impacts to Fort Pierce or similar areas, that will not be getting a stop. The report only discussed positive externalities and economic opportunities that will be spurred in cities with train stops. It is imperative the report identify both positive and negative impacts for all areas that will be affected by the project.

Historical & Cultural Resources:

Preservation of Historical and Cultural Resources is important to the City of Fort Pierce. The City's restoration and preservation efforts have been and continue to be a top priority. Fort Pierce historical buildings were built as long ago as 1882. The typologies of these historic buildings vary from wooden frame, clay, concrete, and marble. Many of the oldest buildings are concentrated downtown and along the river and railroad (Appendix A: Historic Structures and Sites). The impact of additional trains per day on these various historical structures in these areas is unknown. Review of the DEIS report found the FEC did not sufficiently research Fort Pierce historical and archeological sites, nor did they adequately seek local planner comments regarding local historic resources. The report states they contacted our department, however there is not a planner on staff with the City or County who can verify that. There was no reporting or researching included regarding the archeological site at Old Fort Park, the Ais Indian burial mound at Old Fort Park.

Since the FRA did not accurately or sufficiently identify local resources, they did not address the possible negative economical and physical impacts to our community. Increased trains will impact our historical, archeological, and culture resources, but the impacts are currently unknown, due to their lack of research.

Furthermore, FRA did not discuss any mitigation plans addressing how AAF would protect historic and archeological sites. Overall we find this section of the report lacks completeness. We have attached several maps in the Appendix showing the historical resources.

Recreational Resources:

The FEC rail travels along or near several parks including Savannas Preserve State Park , Indian Hills Golf Course, Heathcote Botanical Gardens, Ilois Ellis Park (aka “Open Space Park”) and Indian Hills Recreation Area. Concerns over maintaining and preserving these open, passive spaces have been identified. The report stated there will be some impact from noise and vibration, however they do not speak specifically to our park areas nor do they offer any mitigation plans to protect these valuable areas.

Recommendations:

- Research the economic impacts on historical areas;
- Reevaluate of all historical structures and sites;
- Address impacts on all historical building typologies;
- Improve communication with City of Fort Pierce Planning Department staff; and
- Reevaluate impact on local recreation areas.

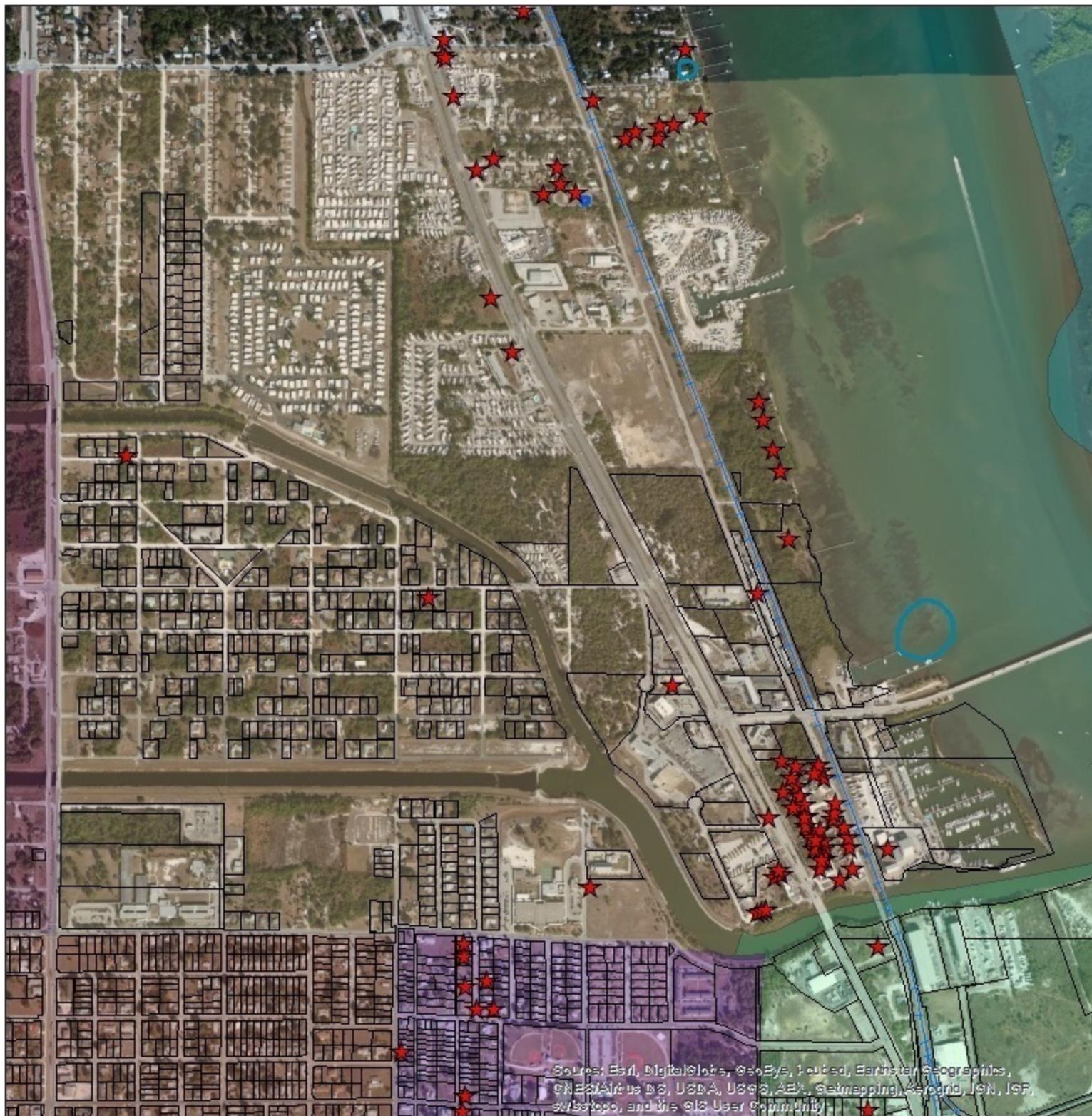
Conclusion

The AAF project is expected to impact the City, however there is not enough information presented in the DEIS to fully evaluate the report and gauge the full extent of the impact. The report lacked meaningful, quantifiable data that could be utilized to evaluate the additional traffic delays; impacts to grade crossings, effects on roadways and adjacent neighborhoods, and most importantly the true costs to the City. The City of Fort Pierce respectfully requests that All Aboard Florida reevaluate the report and provide actual data, not brushstroke statements.

Attachments – Appendix A: Historical Resources in Fort Pierce

Appendix A: Historic Structures and Sites

Fort Pierce Historic Resources



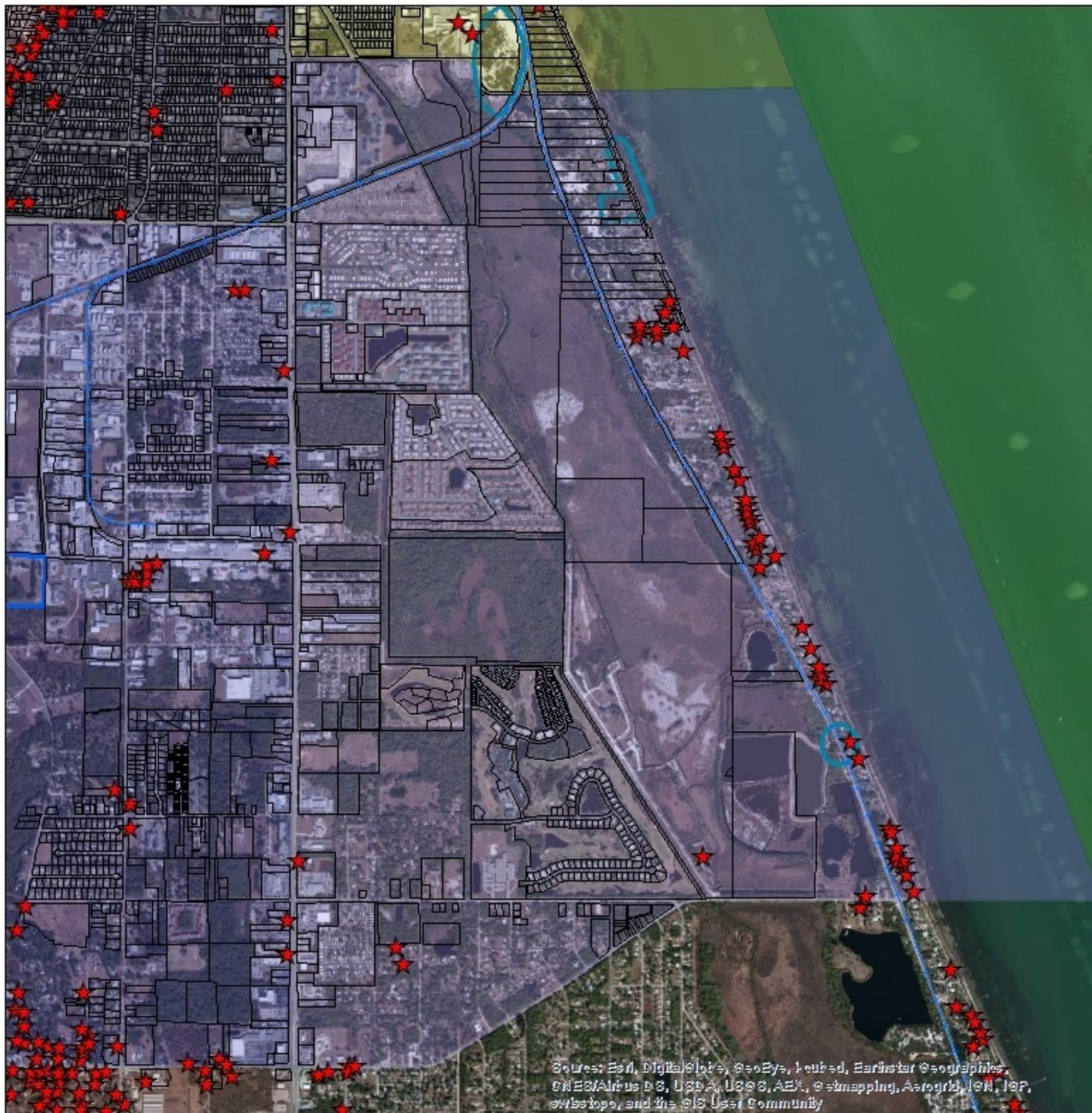
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- +— FEC Rail Tracks
- Historical Cemeteries with FMSF Site ID
- Archaeologic Sites with FMSF Site ID
- U.S. Census Tract**
- 3809.01
- 3802
- 3801
- 3803
- 3809.02
- Fort Pierce City Wide Parcels



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, Aero, Getmapping, Aerotri, IGN, IGF, swisstopo, and the GIS User Community

Map prepared November 4, 2014

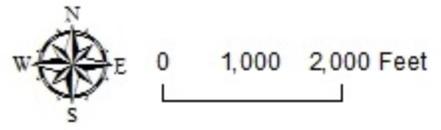
Fort Pierce Historic Resources



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U.S. Census Tract

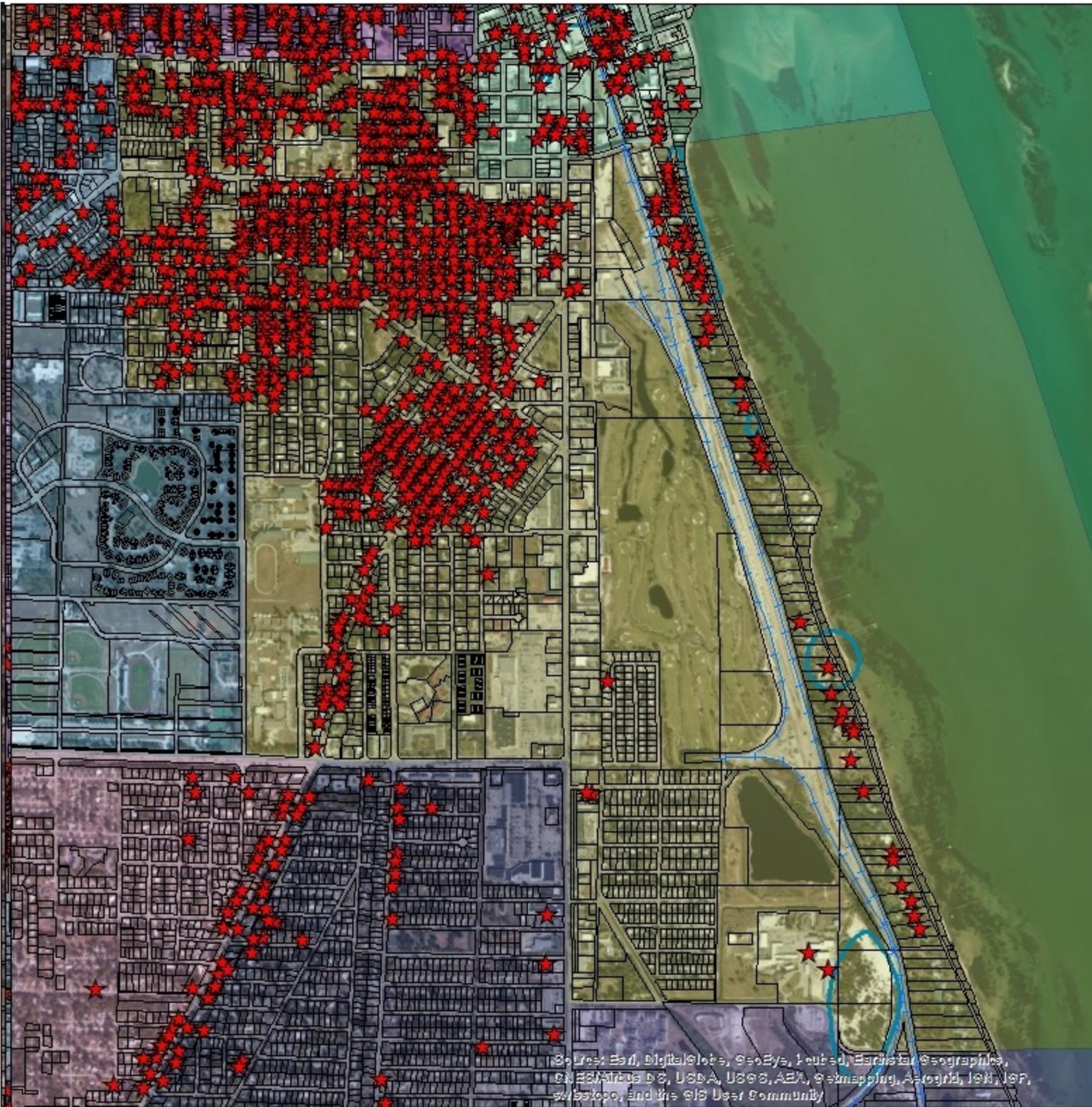
- 3805
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- Fort Pierce City Wide Parcels



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, IGP, swisstopo, and the GIS User Community

Map prepared November 4, 2014

Fort Pierce Historic Resources



★ Historic Structures with FMSF Site ID

— FEC Rail Tracks

□ Historical Cemeteries with FMSF Site ID

□ Archaeologic Sites with FMSF Site ID

U.S. Census Tract

3801

3802

3804

3805

3814.01

3808

□ Fort Pierce City Wide Parcels



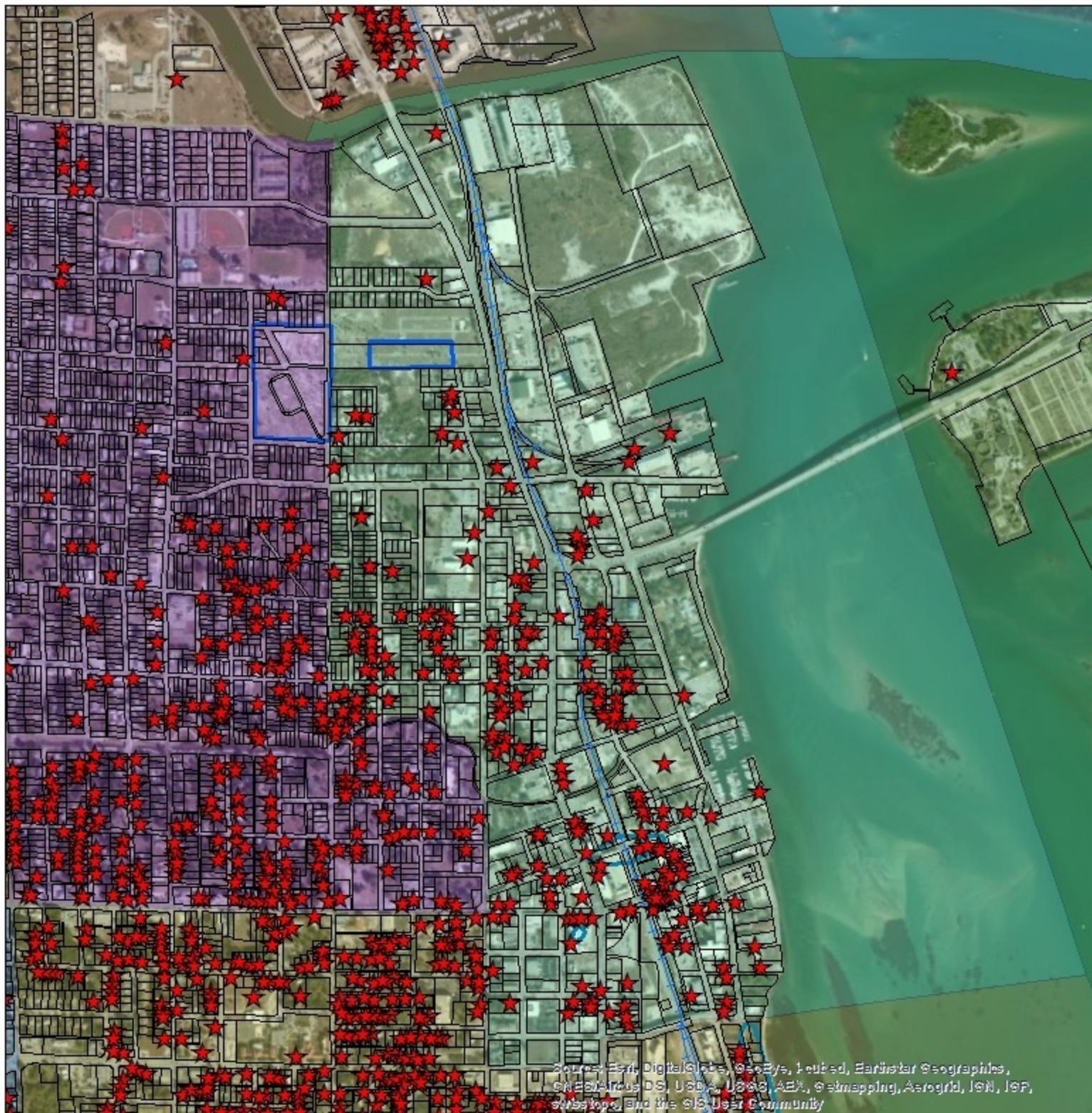
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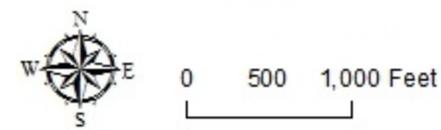
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Fort Pierce Historic Resources



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