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Mr. John Winkle
Federal Railroad Administration
1200 New Jersey Avenue, SE Room W38-311
Washington, DC 20590

December 1, 2014

RE: Comments to Draft Environmental Impact Statement (DEIS)
Project: "All Aboard Florida" (AAF)

The City of Sebastian has reviewed the DEIS for AAF (the Project) and have identified numerous comments and deficiencies within the technical document per the NEPA process. Attached to this comment letter are letters, surveys and correspondence received by the City regarding concerns of this project which the City is officially submitting to be addressed as part of the NEPA review process.

In addition, the City believes that the document is inadequate and does not follow the "Scoping" process as stated in the DEIS, page S-4, which states,

> "Scoping- an early and open process for identifying significant issues related to a project. As part of the scooping process, agencies and the public are invited to participate and provide comment. A series of public scooping meetings for the Project were held in April and May 2013 in Orlando, Fort Pierce, West Palm Beach, Fort Lauderdale and Miami and an agency scooping meeting was held in April 2013. Agencies and the public provided input that informed the scope and content of the environmental studies conducted for the DEIS, including concerns about noise and vibration impacts, impacts to navigation, impacts to wildlife and protected species, safety and traffic operations at grade crossings. The public comments also indicated in interest in additional stations and the opportunity to include a bicycle trail within the railroad right-of-way (ROW)."

As stated above, no where does it state that Indian River County or any of the cities within Indian River County near or along the railroad tracks which includes

the City of Sebastian were contacted to participate in the "early and open process". Therefore, information, appendices, maps, etc., in the DEIS is insufficient, incomplete or missing.

Additionally, the public meeting held on November 5, 2014 at Indian River State College, Mueller Center displayed a map that did not include the City of Sebastian or the City of Vero Beach. Also, where are the comments from these meetings? They were not provided.

CITY OF SEBASTIAN COMMENTS

INTRODUCTION

Section 1.1 and 1.1.2 states, "FRA and AAF conducted an environmental review of Phase 1 in 2012/2013, including preparing and issuing both an Environmental Assessment (EA) (Environmental Assessment and Section 4(f) Evaluation for the All Aboard Florida Passenger Rail Project West Palm Beach to Miami, Florida)", "As a result of the environment review process conducted by FRA in cooperation with AAF for Phase I, AAF is authorized to construct the Phase I component of the Project as reviewed and approved in the 2012 EA and FRAs subsequent FONSI. Since the FONSI, AAF proposed and FRA has evaluated a new location for the proposed ..."; "...impacts exclusively from Phase 1 have already been addressed in the 2012EA and FONSI and will not be reanalyzed in the DEIS."

Comment: Justify why the project was split into two phases. The typical NEPA process cannot split a corridor project. The Project needs to be independent.

Section 1.1.2 states, "The Project includes purchasing five additional passenger train sets, and would add 16 new round trip intercity passenger train trips (32 one-way trips) on the new railroad segment and on the FECR Corridor between Cocoa and West Plan Beach. No additional trips beyond those considered in the 2012 EA (16 round-trip) intercity passenger train trips [32 one-way trips]) would be added on the West Palm Beach to Miami section."

Comment: What about freight trains? Note the existing number of freight trains and the additional freight train trips.

Section 1.3 states, "FRA requested that FAA act as a cooperating agency on the EIS, and the FAA agreed. The Project will require FAA review and approval over changes to FOAA property. Under 49 USC sub-section 401, the FAA has jurisdiction over the layout of airports, including but not limited to approval of airport layout plans, airspace, and facility development."

Comment: The City of Sebastian requested to be part of the cooperating agency due to local knowledge and expertise and was excluded as being a cooperating agency. Why?

Purpose and Need for the Proposed Action

Section 2.1 states, "Project would consist of a 235-mile long intercity passenger rail service with anticipated three-hour travel time. Improvements needed to support the service would include both construction within existing railroad rights-of-way (ROW) and new construction outside of existing railroad corridors.

Comment: The DEIS does not identify where outside? The following are not specified in the DEIS: New Construction activity, existing street crossing impacts and limits outside the corridor.

Section 2.3.4 states, "The municipal areas at the two ends of the project corridor are among the five largest cities in Florida, with .... Miami, at the southern end of the Project Corridor, is the second largest city in Florida (BEBR 2011a; Schlueb 2013)."

Comment: There isn't any mention of Indian River County or other local cities between the two destinations, why not?

Section 2.3.4 illustrates in Table 2.3-4 Population Employed Outside of the County of Residence. It states that 85% are employed in County of residence while 15% are not.

Comment: The DEIS needs to provide support on where the resident population are employed outside the County?

Section 3.2 states, "Level 2 was more fine-grained and evaluated segment alternatives within the preferred route."

Comment: DEIS report does not provide evaluation of preferred route in relation to Indian River County and the local cities.

Section 3.2 states, "FRA has independently evaluated AAF's analysis, validated assumptions, and has prepared the following summary of the alternatives evaluation process." The "Screening Alternatives Chart shows a Process at "Level 2 Connection Alternatives".

Comment: What about the impacts to Indian River County crossings and the seven street crossings within the City of Sebastian.

Section 3.2.1.1 states, "The primary screening criteria used at this level was developed to assess (1) whether the alternative satisfies the purpose and need of the Project, (2) whether the alternative is practicable to construct and operate (satisfies AAF's specified critical determining factors), and (3) to what degree the alternative would have impacts to key environmental resources."

Comment: What is the purpose and need of the project? Who and what determines whether the alternative is practicable to construct and operate? What are the AAF's critical determining factors? What degree is considered to have impacts or not to key environmental resources?

Section 3.2.1.1 states, "...a 300-foot wide corridor centered on the track. This corridor includes the 100-foot ROW in which direct consequences (losses) of the resource would be anticipated, and an additional 100 feet on either side of the ROW where indirect effects to the resource could occur."

Comment: Environmental impact is within 300 foot width---there are many homes and businesses within 300' of the corridor in Sebastian. This was not addressed within the North-South Corridor and the area along the City of Sebastian. Please address.

Section 3.2.1.3 states, "The CSX Route Alternative does not meet the Project purpose. Trip times would exceed the 3-hour target." Table 3.2-1 Screening Analysis Results – Level 1 Route Alternatives.

Comment: The purpose is not stated. What is the purpose and the time of the CSC route?

Comment: Under FECR columns clarify: What is meant by "Partial" for sections: "Use of Existing Infrastructure" and "Train Signaling and Control Systems".

Comment: Under FECR columns, how were the quantities calculated for sections: Environmental: Wetlands and Waterways – Amount of resource directly or indirectly affected (134 acres); Conservation Lands – Amount of resource potentially affected (5 miles); Threatened and Endangered Species – Number of habitats directly or indirectly affected (11).

Section 3.2.2 states, "The FECR Route Alternative (connecting Orlando at the proposed GOAA Intermodal Station to the proposed AAF West Palm Beach Station) consists of a sequence of connected segments. The segments include the western terminus at MCO (the MCO Segment), the East-West Corridor (E-W Corridor), the connection between the E-W and the North-South Corridors (E-W/N-S Connector), and the North-South Corridor (N-S Corridor)."

Comment: There isn't any mention of an Alternate route within Indian River County and City of Sebastian crossings. Why?

Section 3.2.2.1 states, "The total number of at-grade crossings would potentially impact train speeds as trains must reduce speeds in some areas with at-grade crossings;" "New at-grade crossings would add to the Project cost and would impact traffic on local roads. Improvements or widening of existing at-grade crossings would also impact Project cost. The number of at-grade crossings for each alternative was estimated using GIS mapping."
Comment: What is the total number of at-grade crossings?

Comment: What are the costs for the safety improvements at each grade crossing and what are the cost for the seal corridor safety improvements?

Section 3.2.2.6: Table 3.2-2 presents the results of the Level 2 screening analysis. Column Criterion "At-Grade Crossings" number of new or extended crossings states a number "8" under column 2A.

Comment: Why weren't impacts evaluated to street crossings and the nearby intersection of US1 within Indian River County and the City of Sebastian?

Comment: What does the number "8" represent?

Comment: Explain the 2A, 2B, 2B GOAA and 2C.

Comment: Under Threatened and Endangered Species – Number of habitats directly or indirectly impacted under 2B states "11". Where are the 11?

Section 3.3.2 states, "3.3-1 shows the future freight operations within the FECR Corridor that would occur in the absence of the Project. "

Comment: Table 3.3-1 illustrates in 2013 there are 14 trains on average. Total existing trains "14" is not consistent in DEIS.

Section 3.3.2 states, "Currently, the prevailing train control system on the FECR Corridor is commonly known as a "cab with wayside" type system. It utilizes wayside color light signals at interlockings that control safe switching trains from mainline track to mainline track to controlled sidings. The control system is "route-signaling" augmented y in-cab.... FECR is required by FRA regulations to implement a new signal system that will provide positive train control (PTC) by 2015 (49 CFR Part 229). PTC systems are integrated command, control, communication, and information...."

Comment: How does PTC coordinate at existing traffic signal crossings with the existing traffic signal systems along US 1 which are operated by local agency or FDOT?

Section 3.3.3 states, "A new signal system would be implemented as part of the Project that will provide a PTC overlay system with a back office server in the operations control center to achieve compliance with 49 CFR part 229."

Comment: State how train PTC System will work with the existing traffic signal systems since they are two different systems?

Section 3.3.3.3 – North-South Corridor – "The approximately 128.5 miles of the N-S Corridor between Cocoa and West Palm Beach (3.3-3) is part of a larger existing 351-mile system currently operating as a freight railroad."

Comment: What are the project miles within Indian River County and within the City of Sebastian?

Section 3.3.3.3 states, "The proposed improvements include upgrades to bridges and grade crossings, as well as new signalization, new communication systems, and PTC systems. ... The new construction and improvements proposed along the FECR Corridor are: Improve approximately 128.5 miles of rail line; ... Eight miles of new third track; Upgrade highway and pedestrian crossings; and upgrade signals and grade crossings."

Comment: Where are pedestrian crossings and safety upgrades for the grade crossings within the City of Sebastian since the city has identified to AAF sidewalk improvements to the three grade crossings on Barber Street, Schumann and Main Street?

Section 3.3.3.3 states, "Drainage would be accommodated using an existing channel along the east or west side of the ROW. In some cases, this would require relocating existing drainage channels within the ROW"; "At-Grade Crossings – There are approximately 170 highway-rail crossings within the N-S Corridor, of which 159 are at-grade and 11 are grade-separated"..."FECR is responsible for maintenance of the crossing equipment. Each affected highway-rail grade crossing will go through a diagnostic team review to determine the appropriate level of warning. To mitigate noise impacts from train horns AAF has committed, as part of the Project description, to install pole-mounted horns at all highway-rail grade crossings on the N-S Corridor and the WPB-M Corridor unless the community establishes a quiet zone."

Comment: Where is the report and findings from the Field Diagnostic Review that was completed on July 14m 2014? Where is the report and findings for the safety improvements and grade crossing improvements in Indian River County?

Comment: The DEIS did not address the cities that have submitted for the Notice of Intent for Quiet Zones and how does that differ from the AAF sealed corridor improvements? The DEIS needs to identify and address the quiet zones and sealed corridors.

Comment: Project Mitigation is to install pole mounted horns? Are these wayside horns? Where will they be located?

Section 3.3.3.6 states, "Positive Train Control (PTC) System – AAF will implement a PTC system throughout the Project, including the E-W Corridor between Orlando and Cocoa, and the N-S Corridor between Cocoa and Miami. The new PTC system will be interoperable between the AAF and FECR trains. AAF will outfit 55 FECR locomotives as well as its own locomotives to avoid any incompatibility issues. ... AAF will use the existing FECR Radio Base Stations. Parallel additional 11 towers in the planning process."

Comment: Where will the towers be located? Specify sites and heights.

Section 3.4 Operations – Table 3.3.9 – The projected Average Passenger Rail Operating Speeds by County indicate in 2013/2016 Freight No-Action Alternative speed at 38.57 mph; in 2016 Freight (with Project) 43.45 mph, and 2016 Passenger speed at 103.34 mph.

Comment: The Freight and Passenger speeds vary in other reports.

Alternatives Considered in this DEIS

Why aren't the tracks being built in the center of the state, along I-95?

Why weren't overpasses considered for certain railroad crossings?

Environmental Effects

What are the environmental effects for the City of Sebastian?

Land Use and Transportation

Section 4.1 states, "The Project Study Area for land use includes the 50-foot wide existing track bed along the N-S Corridor plus 125 feet on either side (east-west) (east and west) and a 50-foot central track bed plus 125 feet on either side (north-south) for each of the E-W Corridor alternatives"; "Indian River County: Commercial and Services, Industrial, and undeveloped lands."

Comment: 125' + 125' + 50' = 300'; Note: The study corridor width is 300' wide, why are homes and businesses within the 300' not addressed?

Comment: What about residents, homes and mobile homes within the 300' width in the City of Sebastian?

Section 4.1 states, "The N-S Corridor passes through several incorporated municipalities: Cocoa, Melbourne, Vero Beach, Fort Pierce, Jupiter, Palm Beach Gardens, Riviera Beach, and West Palm....The existing FECR Corridor traverses established and heavily developed areas of the three counties. Land uses transition from high density, central business district urban, to medium density residential, to industrial and commercial uses."

Comment: The City of Sebastian was not included. Why?

Section 4.1 – Land Use Plans states, "Table 4.1.1-1 lists the relevant land use plans for those counties crossed by the Project." The Table 4.4.4-1 lists various counties and cities master plans.

Comment: The City of Sebastian has a Comprehensive Master Plan. DEIS does not include it. Why?

Section 4.1.2.1 states, "The existing freight traffic consists of an average 15 trains per day with a low of nine daily trains on Saturday and a high of 17 daily trains Tuesday through Thursday."

Comment: This statement does not match page 3-26 – 14 trains average.

Section 4.1.2.6 states, "The N-S Corridor crosses 159 roadways at grade between Cocoa and West Palm Beach (AAF 2013c)." Table 4.1.2-3.

Comment: The statement above is not consistent with the statement between pages 3-37 stating 170 roadways and 11 grade separations. Explain.

Section 4.1.2.6 Table 4.1.2-4 shows 18 Crossings in Indian River County.

Comment: The total train crossings are not consistent with page 4-8 which has has 14 trains and not 18?

Section 4.1.3.2 states, "St. Sebastian River is a tidal waterway on the border between Brevard and Indian River Counties."

Comment: The St. Sebastian River is within both Brevard and Indian River County.

Section 4.2.1 states, "The primary type of emissions contributing to air pollution in the Project Study Areas is mobile source emissions from combustible engines such as automobiles. Table 4.2.1-3 shows existing mobile source emissions for 2008, the most recent year available, for the Phase II Project area."

Comment: Was a comparison study conducted regarding the figures shown for Indian River County emissions of CO, NO_x? If so, where is the comparison? If not, why wasn't it conducted?

Section 4.2.2.1 states, "Environmental noise fluctuates over time, so noise levels over a stated period of time (1 hour) are commonly represented by the "equivalent sound level," L_{eq}. The "day-night average" sound level (L_{dn}) is a noise metric that represents the equivalent sound energy over a 24-hour period, with a 10-db penalty added to noise events occurring between 10:00 PM and 7 AM. This penalty is intended to compensate ..."

Comment: What about the increment impact of train horns X 32 trains and the freight trains X 14, or X 18?

Section 4.2.2.2 states, "Vibration that propagates into buildings can cause the floors, walls, and ceilings of a room to radiate sound called ground-borne noise (GBN). GBN normally is characterized as a low frequency 'rumbling' sound. GBN is often not a concern for at-grade transit sources and buildings with windows and doors exposed to the transit sources because the contribution of noise from airborne paths can be more significant than the contribution of GBN.

Comment: There needs to be more specific evaluations regarding soil types and how vibration passes through soil since soil material type determines propagation.

Comment: Were any bores conducted and tested and at what depth? If so where and what were the results?

Section 4.2.4.2 states, "Surrounding land uses include undeveloped, residential, commercial, and light industrial properties. As shown in Table 4.2.4-1, 337 potentially contaminated sites occur within 200 feet of the N-S Corridor."

Comment: Where are these 337 locations?

Section 4.3.2 is the section entitled "Wild and Scenic Rivers".

Comment: Where is Indian River Lagoon?

Section 4.3.3.2 states, "Streams and waterways communities include rivers, creeks, canals, and other linear waterways. Freshwater rivers and streams cross the E-W Corridor, the N-S Corridor..."

Comment: What about the Indian River Lagoon?

Section 4.3.4.2 Table 4.3.4-2 indicates that the St. Sebastian River is located in St. Lucie County."

Comment: The St. Sebastian River is located in Brevard and Indian River Counties.

Section 4.4.1.2 states, "The N-S Corridor is within the existing FECR Corridor, and passes through numerous incorporated municipalities: Cocoa, Melbourne, Vero Beach, Fort Pierce, Jupiter, Palm Beach Gardens, Riviera Beach, and West Palm Beach. Among these municipalities, West Palm Beach has the highest population (98,795), while Vero Beach has the lowest total population (15,664) (USCB 2011)".

Comment: What happened to the City of Sebastian? The City has a population of approximately 24,000.

Section 4.4.1.2 states, "Vero Beach's tourist attractions are an important part of the city's economy and the greater region known as the "Treasure Coast" (Vero Beach, Florida n.d.). Recreational activities and attractions in Vero Beach including golfing, water sports, fishing, beaches, museums, and nature tours (Visit Florida 2013b). Vero Beach has a land area of 11.4 square miles: its population density is approximately 1,374 persons per square mile (USCB 2013)

Comment: Where are the tourist attractions and importance of the economy for the City of Sebastian?

Comment: Consistency is lacking in the USCB dates, using population in years USCB 2011 but persons per square mile uses USCB 2013.

Section 4.4.2.2 titled "Affected Environment". It states, "For this analysis, the minority or 'non-White' population refers to persons who reported their ethnicity and race as something other than 'White alone' during the 2010 Census (USCB 2010a)...and shown in Appendix 4.4.2-A." Table 4.4.2-1 Summary of the Minority/'Non-White' Populations per County shows population and percent for 'Non-White'.

Comment: There is a large senior base population. Add seniors as an environmental justice. There are impacts to seniors, noise, vibrations and reaction time at crossings and medical transportation.

Section 4.4.2.2 titled "Low Income". It states, "CEQ's guidance for environmental justice indicates that low-income populations in an affected area .... Table 4.4.2-3 Summary of Poverty Data Status in the past 12 months at the State, County, and Census Tract Level within the Project Study Area shows Indian River County's population for which Poverty is Determined at 134,445 with a population below poverty as 16,984 or 12.6%. In addition, it states that the Median Household Income is $46,363.

Comment: Senior information needs to be included.

Section 4.4.4 titled Public Health and Safety with sub-section 4.4.4.1 Methodology states, "Highway/rail at-grade crossing information was collected from the FRA Grade Crossings database (FRA n.d.). This database provides spatial crossing information that originates from the National Highway-Rail Crossing Inventory Program."

Comment: There is no mention of the 7/23/14 Field Diagnostic review of the crossing and proposed improvements.

Section 4.4.4.2 titled Public Safety states, "The N-S Corridor crosses approximately 171 at-grade crossings. Two of these, located in Palm Beach County... Table 4.4.4-1 N-S Corridor At-Grade Crossing Accident Data by County states there were 31 at-grade crossings in Indian River County.

Comment: Where were these incidents, at what street crossings?

Comment: There isn't any mention of reduction of response time with increase of trains. There isn't any mention of reduction of response time with increase in trains at gate crossings.

Comment: There isn't any mention of local police or fire response times or how response time will impact local emergency response time.

The following are additional comments related to the DEIS.

Navigation
What improvements are being taken for the railroad bridge in the City of Sebastian or will a new bridge be built? If a new bridge is planned, when will the new bridge be built and what impacts will the building of the bridge have on the residents in the area of the bridge as well as the City of Sebastian?

Comment: How will the new bridge affect boat traffic?

Noise
Were there noise studies conducted in the City of Sebastian and if completed when? If they were conducted why aren't they included in the appendix? If not why weren't they conducted?

Comment: why were they not completed?

Vibration
Was there vibration studies conducted along the tracks in the City of Sebastian? If so, when and where are the results? If not, why were they not completed?

Comment: Was there vibration studies conducted near residences and historical buildings or landmarks? If not, why?

Hazardous Materials and Solid Waste Disposal
What type of safety measures are in place for the safety of pedestrians and vehicles?

Comment: What preventative measures are in place in the event there is a derailment and/or a spill of hazardous materials/liquids since the lagoon, river and ocean are in the proximity of the railroad tracks?

Threatened and Endangered Species
Comment: What environmental procedures are being taken to protect the scrub jays, tortoises, manatee, and trees within the City of Sebastian since there are conservation areas close to the railroad tracks? AAF did not contact the City to find out where the protected areas are located.

Communities and Demographics
Comment: The map displayed at Indian River State College on November 5, 2014, did not name the City of Sebastian let alone any other City along the railroad tracks in Indian River County. Why?

Economic Conditions
According to an article on the St. Johns Water Management District website entitled, "*The Indian River Lagoon: An estuary of national significance," states*,

> "The Indian River Lagoon is a diverse, shallow-water estuary stretching across 40 percent of Florida's east coast. Spanning 156 miles from Ponce de Leon Inlet in Volusia County to the southern boundary of Martin County, the lagoon is an important commercial and recreational fishery and economic resource. The total estimated annual economic value of the lagoon is $3.7 billion, supporting 15,000 full and part-time jobs and providing recreational opportunities for 11 million people per year.
>
> The people attracted to the lagoon by its features — its vast diversity of marine life, plants and animals; temperate climates; accessibility and direct links to the Atlantic Ocean — have changed those characteristics over the last century and particularly within the last 50 years. Throughout recorded history, there have been fish kills, algal blooms and changes in water quality. The lagoon has had a natural ability to absorb a certain amount of pollutants. However, when overloaded, the lagoon suffers.

Comment: Explain why the City of Sebastian was excluded.

Comment: Explain how the increase in freight trains and high speed passenger trains provide benefits to the City of Sebastian as well as Indian River County and Vero Beach?

Comment: What will happen to the second set of tracks if the high speed passenger train is not profitable and fails?

Comment: Who will pay for the loss in property value with the additional tracks and the increased freight train trips and high speed passenger trips?

Comment: Who will pay for the maintenance of the railroad crossings?

Comment: What does maintenance programs are in place for the track, anti-vibration pads, RR crossing facilities, etc.? How often will the tracks be inspected?

Comment: How many passengers are anticipated for all 32 trips? What is the price of a ticket? What kinds of profit margins are being considered so the high speed train reports a profit? And if this is not profitable, who will be using the tracks?

Public Health and Safety

Comment: What type of safety measure such as quiet zones, quad gates, pedestrian gates, anti-vibration pads, sound walls, etc. were or are considered along the railroad tracks in residential area?

Comment: Due to the hospital and physician office being on the east side of the tracks and the residence on the left, how long will it take for a freight train to pass through a station? A freight train even 1 mile long will block all main intersections in the City of Sebastian which will prevent emergency vehicles from crossing the tracks. Therefore, what are the lengths of the freight trains traveling through the City 20 times a day? Will the trains be 2 miles long?

Comment: How fast will a freight train travel? How fast will the freight train be traveling if 2 miles in length? What are the plans for increased freight service in the future?

Comment: What safety measures are in place for the high speed passenger train if it derails? What will the speed of the high speed passenger train be as it travels through the City of Sebastian?

Cultural Resources

S-18 last paragraph, states that, "The Project will not adversely affect ("use") any public parks, recreation areas, or wildlife refuges. Collectively, these properties are protected under Section 4(f) of the Department of Transportation Act, as are historic properties."

Comment: AAF representatives for the DEIS never attempted to contact local expert historians from the Sebastian Historical Society to discuss historical buildings, landmarks, etc. Instead, information that was provided from all other Southern Counties and cities was used which was their attempt to mask the lack of Indian River County participation. The DEIS is not reflective of the City's cultural heritage information. This is unacceptable.

Comment: It fails to recognize any historic sites in the City of Sebastian. This needs to be addressed.

Comment: The study needs to determine if the vibration of the freight trains and high speed trains will damage historical buildings, landmarks, etc.?

Recreation and other Section 4(f) Resources
S-18 last paragraph, states that, "The Project will not adversely affect ("use") any public parks, recreation areas, or wildlife refuges. Collectively, these properties are protected under Section 4(f) of the Department of Transportation Act, as are historic properties."

Comment: The DEIS fails to recognize any recreation, public park areas or wildlife refuges in the City of Sebastian. This needs to be addressed?

Comment: The DEIS fails to recognize the Indian River Lagoon in the City of Sebastian. This needs to be addressed. (See article in section "Economic Conditions".)

Visual and Scenic Resources
S-19 Visual and Scenic Resources states, "viewsheds along "N-S" Corridor would remain primarily unchanged."

Comment: This area of the document addresses mostly those areas along SR528 while barely noting the railway immediately adjacent to US 1 that runs from Wabasso (in Indian River County) to Roseland Road. It fails to mention the Indian River Lagoon, Riverview Park or Indian River Drive impacts.

Technical review comments on the Draft Transportation and Railroad Crossing Analysis for AAF dated September 2013 by AMEC Consultants

1. The introduction needs to provide information regarding the AAF field review diagnostic on the North-South corridor, mainly the 32 railroad crossings with Indian River County and the 7 crossings within the City of Sebastian which took place on 7/14/2014 with representatives from FRA, FEC, FDOT and the local agencies.

2. The introduction should include a description of the 32 railroad crossings within Indian River County and the local cities of Vero Beach and Sebastian and the safety improvements required at each of the railroad crossings to ensure a safety seal corridor as mentioned by AAF during public workshops and presentations.

3. Existing Rail and Bus System needs to include a list of all existing transit services and providers along the North-South corridor. It should include the transit service within Indian River County and City of Sebastian known as the Go-Line Transit Service which is provided by the Senior Resource Service. It crosses all 7 crossings within the City of Sebastian.

4. Existing Roadway Network – Table 2-2 contains existing street connections to I-95. It should also list all other parallel regional streets such as US 1, Old Dixie Highway and Indian River Drive within Indian River County and the City of Sebastian. In addition, the Table identifies a segment Level of Service (LOS), but does not identify the location of this segment LOS in relation to the railroad crossings or the street segment.

5. Existing Highway Rail Grade Crossings – Table 2-3 provides a summary of total existing street crossings by County. The number of crossings in Indian River County is listed as 30 crossings, but the actual number of rail crossings within Indian River County is 32 crossings per the AAF field diagnostic data list provided by FEC and AAF for the field review completed in July 14, 2014 which identified design improvement plans that are still not available for review.

6. The FEC/AAF Field Diagnostic Report and improvement plans for each of the North-South Corridor crossings within Indian River County and the City of Sebastian needs to be included with this report and the DEIS to allow for public and local agency review comments

7. Section 3 Railroad Crossing Analysis identifies Indian River County. It should include all the existing regional roadways with AADT within Indian River County and City of Sebastian such as Barber Street, Schumann Drive, CR 512 EB, CR 512 WB and Main Street as well as any pedestrian counts at these crossing.

8. As noted in comment 7, the additional regional street crossings within the City of Vero Beach and City of Sebastian should include aerial maps of the these street crossings with AADT per the field diagnostic study conducted on July 14, 2014 and any safety. Street crossing improvements need to be shown on these aerial plans to allow the public and local agencies to review and provide comments on the crossing improvements as it relates to the local streets.

9. Traffic Data – Where are the traffic counts for the streets within the City of Sebastian which include Barber Street, Schumann Drive, CR 512 EB, CR 512 WB and Main Street that were conducted with the field diagnostic study?

10. The Traffic Data identifies a standard 2% truck (heavy vehicle factor) which is low for streets such as CR 512. CR512 is the only regional access into the City of Sebastian and therefore needs to be verified and revised.

11. The DEIS noted traffic signal system improvements needed at street crossings within the North-South Corridor. These improvements need to be identified in this Railroad Crossing Analysis as well as any improvements to the signal timing system. They need to be shown to allow for a technical review from the public and local agencies.

12. The FRA On-site Engineering Field Report – Part 1 dated March 2014 needs to be mentioned and included in the Railroad Crossing Analysis of the DESI document since it identified specific technical safety improvements relating to the crossings and the seal corridor.

13. The identified percentage for the manual turn movement counts need to be justified with actual turn counts to validate these percentages for turn movements within the City of Sebastian intersections.

14. Need to provide the support data or analysis regarding how some of the train data shown on Table 3-1 were determined, such as the "time to clear crossing of 5 sec" and "maximum closure time per hour of 1.7"

15. The Traffic Operational Analysis identifies using the Level of Service (LOS) per ICU method which is not used by FDOT and most local agencies when determining LOS for intersections and street segments. FDOT uses the Highway Capacity Method to determine LOS. Review and correct using the correct method.

16. Add tables to show the Level of Service (LOS) for the intersections and segments within the City of Sebastian at the railroad crossings along Barber Street at US 1, Schumann Drive at US 1, CR 512 EB at US 1, CR 512 WB at US 1 and Main Street at US1. In addition, add a street segment LOS at these street crossings showing the approach queue values.

17. Construction impacts should identify the impacts to the local street crossings and the adjacent intersections of US 1 to the street crossings in the City of Sebastian at US 1 and Barber Street, Schumann Drive, CR 512 EB, CR 512 WB and Main Street.

18. Regional Roadway Network impact needs to include the regional roadway crossings of Barber Street, Schumann Drive, CR 512 EB, CR 512 WB and Main Street and the adjacent parallel regional roadway of US 1 which is the only North-South corridor within the City of Sebastian.

19. Local Vehicular Transportation Impacts need to include the regional roadway crossings of Barber Street, Schumann Drive, CR 512 EB, CR 512 WB and Main Street as well as the adjacent parallel regional roadway of US 1 which is the only North-South corridor within the City of Sebastian.

20. Table 4-1 needs to include all of the street crossings and needs to include the regional roadway crossings at Barber Street, Schumann Drive, CR 512 EB, CR 512 WB and Main Street as well as the adjacent parallel regional roadway of US 1 which is the only North-South corridor within the City of Sebastian.

21. Table 4-2 shows the total number of crossings to be 30 within Indian River County; however the correct number is 32 crossings per the AAF/FEC field diagnostic review study.

22. Summary and reference need to note the AAF field review diagnostic on the North-South corridor, mainly the 32 railroad crossings within Indian River County and the 7 crossings within the City of Sebastian. The AAF field review diagnostic took place on 7/14/2014 with representatives from FRA, FEC, FDOT and the local agencies

23. The summary and report should have addressed pedestrian crossings at all of the street crossings within the corridor and in the City of Sebastian since the City has sidewalk design plans for each of the railroad crossings at Barber Street, Schumann and Main Street. Address this.

24. Barber Street grade crossing, in the City of Sebastian, is not officially listed in the FRA inventory of railroad crossings, so why was this not identified in the DEIS or the Additional Railroad Crossing Analysis?

The City of Sebastian encourages the Federal Railroad Administration, the All Aboard Florida consulting firm, and All Aboard Florida principals Final EIS incorporate provisions that will address the issues outline in the response document and in every other DEIS response document provided by organizations and individuals in the City of Sebastian, Florida.

Respectfully submitted,

Frank Watanabe,
City Engineer

Joe Griffin,
City Manager

cc: File