



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

November 30, 2022

Justin Marks
Clark Hill
1001 Pennsylvania Avenue, NW
Suite 1300 South
Washington, D.C. 20004

RE: Docket No. FD 36575, Townline Rail Terminal, LLC – Construction and Operation Exemption – Hamlet of Kings Park, Town of Smithtown, Suffolk County, NY; **Information Request No. 2**

Dear Mr. Marks:

Consistent with 40 C.F.R. § 1506.5(b)(1), the Surface Transportation Board's (Board) Office of Environmental Analysis requests the information below, which is needed to support the environmental review in connection with the above-referenced proceeding. This information will be used to describe Townline's development of the proposed action and any other alternatives that it considered.

The environmental review is required to include a discussion of alternatives, pursuant to section 102(2)(E) of the National Environmental Policy Act (NEPA). Any alternatives considered but dismissed from detailed analysis need to be briefly described and the reasons for their elimination clearly explained. Please provide responses to the questions below. Alternatives and/or design options that were rejected due to increased environmental impacts should be discussed here as well.

1. What were the selection criteria and/or site considerations used to design the proposed rail line?
2. What were the engineering considerations that were included in designing the proposed rail line?
3. Are there other alignments that Townline considered and dismissed, and if so, why were they dismissed?
4. How did Townline determine that 5,000 feet of rail line was needed? Does the proposed length allow for additional cars to accommodate future growth?
5. Do the anticipated 25 cars per train address current needs or allow for future growth?
6. What agencies and organizations did Townline consult, if any, in designing the proposed rail line? What feedback has the Town of Smithtown provided on design options?
7. Do existing agreements only allow for a single switch?
8. Will the daily trip to the proposed rail line be by an existing NYA freight train or is the proposed action anticipated to add an additional train to the LIRR?

Please provide your response as soon as possible and no later than December 19, 2022. If you have any questions, please feel free to contact Andrea Poole of my staff at 202-245-0305 or by email at Andrea.Poole@stb.com. Thank you for your assistance in this matter.

Sincerely,

Danielle Gosselin
Acting Director
Office of Environmental Analysis

Justin J. Marks
T (202) 772-0916
F +12027720919
Email:jjmarks@ClarkHill.com

Clark Hill
1001 Pennsylvania Avenue N.W.
Suite 1300 South
Washington, DC 20004
T (202) 772-0909
F (202) 772-0919

December 5, 2022

Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20024

Re: Townline Rail Terminal, LLC
– Construction and Operation of a Line of Railroad –
In Suffolk County, NY
Surface Transportation Board Finance Docket 36575
Information Request No. 2

Dear Ms. Gosselin:

Please find the enclosed responses of Townline Rail Terminal, LLC ("Townline") in response to Information Request No. 2 that the Surface Transportation Board's Office of Environmental Analysis submitted to us in your November 30, 2022 letter.

1. What were the selection criteria and/or site considerations used to design the proposed rail line?

Response:

The Town of Smithtown planning department selected the final draft plan as the best layout of all options presented to it. The final is the result of 22 different configurations developed since 2015, that is the culmination of design efforts by HDR, planning suggestions by the Town of Smithtown, logistics suggestions from New York and Atlantic Railway ("NYAR") and property acquisitions made by Carlson.

2. What were the engineering considerations that were included in designing the proposed rail line?

Response:

Engineering considerations included in the design of the proposed rail line include:

- a. Topography of the site, including the existing 0.7% grade of the existing LIRR Port Jefferson Branch.

- b. NYAR's operating environment on the LIRR. To provide adequate interchange services, NYAR prefers that the rail line and storage yard be capable of interchange without switching on the main. As a result, a tail track and engine escape are essential for the proper operation of the facility.
 - c. Design considerations from the Town of Smithtown, including the addition of a vegetative buffer and 500' residential buffer to the transfer station location.
 - d. Inclusion of storage tracks adequate to accommodate Townline's daily needs in addition to storage buffer in case interchange services are delayed.
 - e. AREMA design criteria and engineering best practices for industrial yards inform the geometric design of the yard. Geometry approved by NYAR as their equipment will operate over the proposed rail line.
3. Are there other alignments that Townline considered and dismissed, and if so, why were they dismissed?

Response:

Townline considered three general concepts, designed to meet the engineering and operating considerations discussed in Question #2. The general concepts included:

- a. Yard accessed from the west with a right-hand turnout on the LIRR Port Jefferson Branch
- b. Yard accessed from the east with a left-hand turnout on the LIRR Port Jefferson Branch.
- c. Double ended yard, with a connection on both ends to the LIRR Port Jefferson Branch.

Option B, above, was dismissed in consultation with the NYAR, the sole interchange railroad for the proposed facility.

Option C, above, was dismissed due to the increase in construction and maintenance cost and lack of operational need for a double ended yard. Further, it was dismissed because of considerations since tying into both ends would result in unacceptable grade of ~0.7% for the storage tracks.

4. How did Townline determine that 5,000 feet of rail line was needed? Does the proposed length allow for additional cars to accommodate future growth?

Response:

The length of rail line is based on the maximum allowable length within the constraints of the site. This length will accommodate a 25-car train, which was determined to be adequate for Townline's current and future needs.

5. Do the anticipated 25 cars per train address current needs or allow for future growth?

Response:

The 25 cars per train is the maximum the site can support for interchange with NYAR without switching on the LIRR Port Jefferson Branch, which is the preferred operation for NYAR and LIRR. This accommodates a tail track and engine escape adequate for two (2) locomotives to drop off 25 cars and pick up 25 cars per interchange. This car quantity was determined to be adequate for Townline's current and future needs.

6. What agencies and organizations did Townline consult, if any, in designing the proposed rail line? What feedback has the Town of Smithtown provided on design options?

Response:

Townline included the Town of Smithtown and their design suggestions were implemented in the final draft facility layout. Townline has requested a letter from the town supporting this statement.

7. Do existing agreements only allow for a single switch?

Response:

The existing agreement with NYAR and LIRR allows for a single right-hand No. 10 turnout at Milepost 41.7 on the LIRR Port Jefferson Branch. Accommodating a second switch is not required for the operation due to the addition of an engine escape and would result in an unacceptable grade of ~0.7% for the storage tracks.

8. Will the daily trip to the proposed rail line be by an existing NYA freight train or is the proposed action anticipated to add an additional train to the LIRR?

Response:

NYAR service to the facility depends on other NYAR customer requirements and will be at NYAR's discretion. It is currently anticipated that NYAR will service the facility with an additional train hauling in empties and carloads of commodities and hauling out loaded cars and empties in one move.

If you have any questions related to these responses, please let me know.

Sincerely,



Justin J. Marks
Counsel for Townline Rail Terminal, LLC

Justin J. Marks
T (202) 772-0916
F +12027720919
Email:jjmarks@ClarkHill.com

Clark Hill
1001 Pennsylvania Avenue N.W.
Suite 1300 South
Washington, DC 20004
T (202) 772-0909
F (202) 772-0919

December 7, 2022

Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20024

Re: Townline Rail Terminal, LLC
– Construction and Operation of a Line of Railroad –
In Suffolk County, NY
Surface Transportation Board Finance Docket 36575

Supplement to Information Request No. 2

Dear Ms. Gosselin:

Please find the enclosed supplement to the responses of Townline Rail Terminal, LLC ("Townline") to Information Request No. 2 that Townline provided on December 5, 2022.

In Question #6, OEA asked: What agencies and organizations did Townline consult, if any, in designing the proposed rail line? What feedback has the Town of Smithtown provided on design options?

Townline responded that it "included the Town of Smithtown and their design suggestions were implemented in the final draft facility layout. Townline has requested a letter from the town supporting this statement."

The Town of Smithtown has provided a response via email that Townline is enclosing herein as a supplement to this answer. In its email, the Town states that it has no objections to "placement of the rails as depicted on the layout plan." Further, the Town states that it is "encouraged to see that this plan moves the rails further from the residences north of the LIRR as opposed to locations shown in prior layout plans." The Town refers to the rail layout plan as the "'Kings Park Conceptual layout revised April 13, 2022'".

The Town's reference is to the same map that Townline included in Exhibit A of its November 17, 2022 Petition for Exemption.

December 7, 2022
Page 2

If you have any questions related to this supplement, please let me know.

Sincerely,

A handwritten signature in blue ink that reads "Justin J. Marks". The signature is written in a cursive, flowing style.

Justin J. Marks
Counsel for Townline Rail Terminal, LLC

Enclosure

Marks, Justin J.

From: Toby Carlson <Toby@carlsoncorp.com>
Sent: Wednesday, December 7, 2022 11:00 AM
To: Marks, Justin J.
Subject: FW: Townline Rail Terminal, LLC - Docket No. FD 36575

[External Message]

From: "Jennifer Juengst (Town Attorney)" <JJuengst@smithtownny.gov>
Date: Wednesday, December 7, 2022 at 10:59 AM
To: Toby Carlson <Toby@carlsoncorp.com>
Cc: "Allyson Murray (Planning)" <Amurray@smithtownny.gov>, "Peter Hans (Planning)" <phans@smithtownny.gov>, "DBarnes@smithtownny.gov" <DBarnes@smithtownny.gov>, "Richard.Semenick@hdrinc.com" <Richard.Semenick@hdrinc.com>
Subject: Townline Rail Terminal, LLC - Docket No. FD 36575

This email confirms our conversation today regarding the rail layout in the concept plan entitled, "Kings Park Conceptual Layout" revised April 13, 2022.

The Town has no objection to placement of the rails as depicted on the layout plan. The Town is encouraged to see that this plan moves the rails further from the residences north of the LIRR as opposed to locations shown in prior layout plans.

Jennifer A. Juengst
Assistant Town Attorney
Town Attorney's Office
99 West Main Street
Smithtown, New York 11787
Tel. 631-360-7570
Fax 631-360-7719
jjuengst@smithtownny.gov

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