

Tom and Ouida Schliesing

P.O. Box 1458
Uvalde, Texas 78802
tgschliesing41@gmail.com
830-278-0442
April 10, 2025

Surface Transportation Board

395 E Street SW
Washington, DC 20423

Subject: Formal Opposition to Burnet-Lampasas Rail Expansion (STB Docket No. 36815)

Dear Members of the Surface Transportation Board,

I am writing to formally oppose the proposed Burnet-Lampasas rock-hauling rail line due to its severe environmental impacts on biodiversity, water quality, and the rural landscape of the Texas Hill Country. This project threatens vital ecosystems, protected species, and water resources that are essential for the health and sustainability of our communities. As parents of a landowner in the Texas Hill Country, I urge the STB to reject this project unless these critical concerns are fully addressed:

1. Impacts on Biodiversity

The Texas Hill Country is home to numerous federally endangered and vulnerable species that depend on its unique ecosystems. The proposed rail line would fragment habitats critical to species such as the **Golden-Cheeked Warbler**, **Black-Capped Vireo**, **Guadalupe Bass**, as well as the **Bone Cave Harvestman spider**. The Texas Hill Country's unique karst topography and riparian zones cannot withstand the disturbance of riparian zones along Sulphur Creek and subsequent Lampasas River watershed caused by 14.4 miles of new rail construction. These areas are essential for wildlife movement, breeding, and feeding. Habitat destruction from construction would further accelerate the decline of these species, many of which have already suffered due to unchecked development in the region.

2. Threats to Water Quality

Sulphur Creek is a spring-fed tributary of the Lampasas River and serves as a vital waterway supporting aquatic life designated as "high aquatic use" by the Texas Commission on Environmental Quality (TCEQ). Construction activities would increase sedimentation, nutrient loading, and pollution runoff into Sulphur Creek, which flows directly into the Lampasas River.

3. Destruction of Fragile Ecosystems

The rail line's construction across **Sulphur Creek** threatens one of Central Texas' most vital waterways. This creek is a breeding ground for the **Guadalupe bass** (Texas' state fish) and supports clean-water species classified as "high aquatic life use" by the TCEQ. Sedimentation, pollution, and habitat fragmentation from rail construction would degrade this ecosystem, with cascading harm to the **Lampasas River** downstream. The creek's base flow, sustained by Hancock and Hanna Springs, is already vulnerable to contamination, as noted in historical TCEQ reports.

4. Threats to Landowners and Rural Communities

The rail line would fragment agricultural and ranch lands, reducing property values and hindering wildlife movement.

Over **1,800 residents** have petitioned against this project, citing inadequate public notification and rushed deadlines for input. The use of eminent domain to seize private land for a privately owned rail line sets a dangerous precedent, undermining property rights.

5. Cultural and Historic Preservation

The route passes near **Thornal Cemetery** (est. 1900) and **Scott Hollow**, a historic settlement. Construction noise, vibrations, and land disruption risk irreparable damage to these cultural landmarks.

6. Destruction of Native American Historical Areas

The proposed 27-mile rail line between Burnet and Lampasas, Texas, poses significant risks to Native American historical areas and artifacts in the Texas Hill Country, a region with deep Indigenous heritage. The Texas Hill Country is rich with Native American history, including ancient trails, settlements, and artifacts. For example:

- **Pinta Trail:** The proposed rail route could intersect with or parallel historical pathways like the Pinta Trail, an Indigenous route later adapted for Euro-American wagon roads and railways. Construction risks destroying undiscovered artifacts or burial sites along similar corridors.
- **Battlefields and Sacred Sites:** Areas near Lampasas were sites of 19th-century conflicts, such as the Battle of Kickapoo Springs (1870), where U.S. forces clashed with Apache communities. Rail construction could disturb such historically sensitive areas.

Similar to the Transcontinental Railroad's history of displacing Native communities and ignoring treaties, the current project is facing criticism for inadequate community engagement. Local landowners report being "left in the dark", raising concerns that Indigenous stakeholders may also lack representation.

Federal laws like the National Historic Preservation Act (NHPA) require consultation with tribes to protect cultural resources, but rushed permitting processes risk bypassing these safeguards. The Surface Transportation Board's environmental review must address compliance with **NAGPRA** (Native American Graves Protection and Repatriation Act) and NHPA. However, the project's accelerated timeline risks inadequate archaeological surveys. Historical parallels, such as the displacement caused by the San Antonio and Aransas Pass Railway, highlight the irreversible consequences of prioritizing infrastructure over cultural preservation.

7. Inadequate Environmental Review

The draft Environmental Impact Statement (EIS) does not account for cumulative impacts on the Lampasas River watershed, already stressed by failing septic systems and agricultural runoff. It fails to provide meaningful mitigation for diesel emissions, noise pollution, or habitat restoration. And it does not address alternatives like upgrading existing roads or rail lines to reduce truck traffic without new infrastructure.

Requests for Action

1. **Halt the project** until a comprehensive, independent environmental review is conducted.
2. **Prioritize upgrades to existing infrastructure** (e.g., Highway 281 or the Austin Western Railroad) over new construction.
3. **Require robust community engagement**, including extended public comment periods and hearings in Burnet/Lampasas counties.
4. **Protect Sulphur Creek** with enforceable buffer zones and stormwater controls to prevent sedimentation and pollution.

The Texas Hill Country's ecological integrity, rural character, and clean water resources are irreplaceable. This project prioritizes corporate interests over the health of our communities, ecosystems, and future generations. I stand with the 1,800+ petitioners in demanding the STB reject this ill-conceived proposal.

Sincerely,
Tom and Ouida Schliesing