

October 15, 2025

Jay C. Johnson

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Adam Assenza
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36633, Plaquemines Port Harbor and Terminal District
(PPHTD) – Construction and Operation Exemption – Line of Railroad in
Plaquemines Parish, Louisiana; Response to Information Request No. 1

Dear Mr. Assenza:

This letter responds to the Office of Environmental Analysis's first information request in Docket No. FD 36633.

1. Proposed Action:

IR1-1. *Please provide shapefiles or .kmz files for the centerlines, right-of-way (ROW), and access roads, with annotation, consistent with what is shown in the Preliminary Design Drawings for PPHTD's preferred alignment provided to OEA on September 2, 2025. If shapefiles or .kmz files are not available, please provide CAD files that we may use for conversion.*

The requested .kmz files are being transmitted via email with this letter.

IR1-2. *Please provide shapefiles or .kmz files for any staging areas or laydown yards proposed along PPHTD's preferred and any alternative rail alignments.*

PPHTD is negotiating the purchase of property that is adjacent to the rail extension right-of-way. This property would be available for storage, staging, and laydown. Because negotiations are ongoing, PPHTD will provide more details about the location when the negotiation is complete.

It remains possible that the preferred storage, staging, and laydown site could change based on additional engineering and construction planning. But given the Board's "discretion" and "broad latitude to draw a 'manageable line'" in preparing its NEPA

review, *Seven County Infrastructure Coalition v. Eagle County*, 145 S. Ct. 1497, 1513 (2025), PPHTD believes that identifying the currently planned site in the EA (once the purchase is complete) will be sufficient to “inform” the Board’s decisionmaking, *id.* at 1507. This is especially true because the impacts from staging areas and laydown yards are temporary, and any impacts outside the rail right-of-way will be mitigated when construction is complete.

IR1-3. *Please provide information about PPHTD’s approach to securing right-of-entry for the parcels identified in Attachment A so that OEA can conduct appropriate field work.*

To secure the right-of-entry for the parcels listed in Attachment A, PPHTD has taken the steps described below:

- Parcel ID 1601611 - Alliance River Properties: discussions are ongoing.
- Parcel ID 1176225 – NOLA Oil Terminal, LLC: right-of-entry is secured.
- Parcel ID 1119300 – IMT: right-of-entry is secured.
- Parcel ID 1269400 – IMT: right-of-entry is secured.
- Parcel ID 1172955 – Woodland Borrow Pits, LLC: no right-of-entry is needed (see discussion below).
- Parcel ID 8337286 – Plaquemines Land Ventures LLC: discussions are ongoing.
- Parcel ID 1616913 – Plaquemines Land Ventures LLC: discussions are ongoing.
- Parcel ID 1172967 – Plaquemines Land Ventures LLC: discussions are ongoing.
- Parcel ID 1614351 – Bolsu PCF LLC: PPHTD has acquired a letter of intent to secure a right-of-entry.

IRI-4. *Please provide the design information for the first mile of new rail line and the crossing at the Venture Global, LLC property.*

As mentioned during PPHTD’s September monthly applicant meeting, this information is in progress and will be provided once complete. PPHTD is working with the residents of Ironton and with Venture Global to ensure its design has the greatest practicable degree of stakeholder buy-in.

2. Construction/Design

IR1-5. *Please confirm whether all construction and potential ground disturbances would be confined to a 40- to 100-foot ROW for PPHTD's preferred alignment and any alternative rail line alignments.*

PPHTD does not anticipate that any construction or ground disturbances will fall outside of the rail right-of-way. If any disturbance were to occur, it would be restored when construction is complete.

IR1-6. *Please describe the general construction process for the proposed rail line, including the materials that would be used and the anticipated railbed width (in feet).*

Construction of the proposed rail corridor will follow standard railroad construction practices, including AREMA and Union Pacific Railroad specifications. Work will include clearing and grubbing, earthwork and subgrade preparation, placement of subballast and ballast, and installation of the complete track structure.

A typical trackbed section will be constructed as follows:

- Subgrade: Compact to at least 95 percent of maximum dry density per ASTM D698 (Standard Proctor) with a 2 percent cross-slope to promote positive drainage. A nonwoven geotextile separator will be placed on the finished subgrade prior to subballast placement.
- Subballast: Place a minimum 12-inch compacted layer of well-graded crushed aggregate meeting AREMA Chapter 1, Part 2, section 5.1. The subballast will be compacted in lifts over the geotextile fabric.
- Ballast: Provide a minimum 12-inch layer of clean, angular ballast conforming to AREMA #4A gradation. Ballast will be tamped and regulated to achieve uniform bearing and alignment beneath the ties.
- Track Structure: Install 115-lb RE rail (min.) supported on 7" x 9" x 8'-6" timber ties (grade 5) spaced per AREMA/UPRR recommendations. Underdrains and retaining walls will be included where indicated in the typical sections.

Based on additional construction planning and engineering, the rail ROW width is generally 60 feet. The rail bed including all infrastructure's width for a single mainline track is 28 feet, increasing to 48 feet where mainline and siding tracks run parallel.

The estimated construction material quantities, derived from the 360 Rail Services 50% design geometry and plans (as sent to OEA on September 2, 2025) are summarized below.

TABLE 1

MATERIAL/ITEM	UNIT OF MEASURE	ESTIMATED QUANTITY
Cut Volume	Cubic Yard	92,290
Fill Volume	Cubic Yard	49,109
Subballast	Cubic Yard	83,804
Ballast	Ton	125,000
Cross Ties (Grade 5 Hardwood)	Each	29,721
Tie Plates	Each	59,442
Anchors (Boxed Every Other Tie)	Each	59,442
Spikes	Kegs	500
Rail (115-lb minimum)	Lineal Foot	118,884

PPHTD further notes that because it is a public entity, it must conduct a Request for Proposal process to select suppliers of construction materials. As a result, it does not and cannot know where those materials will come from at this time. All it can say at present is that materials and suppliers are readily available in the area, and may include New Orleans & Gulf Coast Railway Company, BOLSU PCF, Vulcan Materials, or Pontchartrain Materials. Further, the desired method will be to bring the track construction materials by rail, thus minimizing the truck traffic impact.

The most intensive equipment use will occur during subgrade and structural-fill placement, while lighter rail-mounted specialty equipment will be used during final track construction.

Table 2 lists the equipment anticipated to be used during construction.

TABLE 2

EQUIPMENT TYPE	NUMBER OF UNITS
<i>Subgrade construction and placement of structural fill</i>	
Excavator	6
Dozer	6
Compactor	12
Motorgrader	6

Water Truck	2
<i>Subballast construction</i>	
Dozer	2
Roller	2
Motorgrader	2
Water Truck	1
<i>Track Construction</i>	
Excavator	2
Rubber Tire Loader	2
Rubber Tire Backhoe	2
Hi-rail Boom Truck	1
Track Spiker	1
Track Tamper	1
Track Regulator	1
Track Broom	1

Most of the permanent railbed, including access road and shoulder drainage ditches, will be 100 feet wide. In a few areas, the railbed will be less than 100 feet to accommodate existing facilities and structures. These areas are shown in the drawings supplied on September 2, 2025. The railbed alone, without considering the planned access road and ditches, will be 28 feet wide for the primary track and 48 feet wide where the siding and primary track are parallel.

IR1-7. *Please provide the proposed construction timeline and hours of construction per day for the proposed rail line.*

As with materials suppliers, PPHTD must conduct a Request for Proposal process to choose a construction contractor. That process will not happen until the project has completed the regulatory process. Once a construction contractor is chosen, that contractor will have some discretion in deciding how construction progresses. PPHTD will use the following guidelines when it chooses a construction contractor.

Based on production sequencing developed by 360 Rail Services, construction is expected to occur in sequential work segments corresponding to the design mileposts.

The project includes five primary linear segments and one siding section, as shown in Table 3.

TABLE 3

Segment	Limits (MP)	Length (LF)	Duration (Days)	Work Components
1	22.78 – 24.00	6,441	99.2	Civil, Track, Surfacing
2	24.00 – 26.00	10,560	94.2	Civil, Track, Crossings, Surfacing
3	26.00 – 28.00	10,560	79.2	Civil, Track, Crossings, Surfacing
4	28.00 – 30.00	10,560	64.2	Civil, Track, Crossings, Surfacing
5	30.00 – 32.40	12,714	55.2	Civil, Track, Turnouts, Surfacing
Siding	30.50 – 32.00	8,607	44.2	Civil, Track, Surfacing

Using the production rates included below, 360 Rail Services estimates that the total construction duration will be approximately 179 days.

- Civil Construction Production Rate: 386 LF/day
- Track Construction Production Rate: 400 LF/day
- Track Surfacing Production Rate: 833 LF/day (three lifts/day)
- Crossing Installation Rate: 100 LF/day
- Turnout Installation: 3.5 days each

Construction activities will occur Monday through Saturday, limited to daylight hours (10-hour shifts). No night or Sunday work is anticipated unless required for schedule recovery or under special approval.

IR1-8. *Please provide road crossing designs, including what types of safety equipment, barriers, and signaling would be used.*

The proposed route will cross two public roads, Ironton Road and Myrtle Grove Road, as well as a number of private roads.

All crossings will be protected in accordance with AREMA and Department of Transportation guidelines. These protections may include advance warning signage, crossing signage, crossbucks, flashers, or drop-arm barriers. The precise style of crossing

selected will depend on a number of factors, including community input and more detailed design and engineering work.

IR1-9. *Please provide the number, location, and types of crossings of any other existing infrastructure or utilities (e.g., transmission lines) anticipated, if any.*

The preferred route's only above-ground utility crossing will be the Venture Global LNG Plant pipe bridge located close to Station 359+55. The preferred route will also cross at Bolsu as well as cross at underground pipelines in five places. The preferred route will cross underground pipelines in five places.

3. Transportation/Traffic

IR1-10. *Please provide the maximum and average train operating speeds anticipated on the proposed rail line.*

The maximum train speed will be 10 mph. Average operating speeds will be between 5 and 10 mph.

IR1-11. *Please provide the anticipated length and composition of trains that would operate on the proposed rail line.*

The proposed rail line—the “project at hand,” in the Supreme Court phrasing—will connect the existing New Orleans & Gulf Coast Railway line with the proposed Louisiana Gateway Container Terminal. PPHTD notes that the container terminal must go through its own environmental review and permitting process, in addition to the commercial, real estate, and financing agreements that must be concluded, before it can be built.

For purposes of drawing a manageable line that will help the Board in its decisionmaking, PPHTD assumes that if and when the container terminal is built, it will send 2–3 container unit trains per week on the new line. These trains would have an average length of 2500 feet and would be powered by two GP-38-3 locomotives. Train length may vary, depending on the number of containers entering and exiting the port terminal, but the maximum length that existing NOGC infrastructure can accommodate is 4000 feet.

IR1-12. *Please provide the anticipated truck traffic that may be required during construction of the proposed rail line (i.e., trucks per day for delivery of construction materials, etc.).*

As noted above, PPHTD intends to deliver construction materials via rail and barge to the maximum extent practicable.

Rail and ballast in particular will likely be delivered by work train. These deliveries would be part of NOGC's rail operations and will not affect existing traffic through local communities.

Subballast material and other aggregates will likely be delivered by river barge. Using the estimates in Table 1 above, about 150 barge loads of subballast materials will be required. Barge delivery will not affect existing traffic in local communities.

To the extent materials cannot practicably be delivered by rail or barge, trucks would be used. If such deliveries are necessary, PPHTD anticipates that the number of truck trips would be minimal and would not affect traffic in the area.

IR1-13. *Please provide the number of trains per day anticipated to operate on the proposed rail line and any anticipated increases in number of trains per day for future rail operations.*

As noted above and in the information paper already submitted to the Board, PPHTD expects rail traffic in the range of 2–3 trains per week, assuming for purposes of drawing a manageable line that the container terminal goes into operation around the same time that the rail line does.

We hope that this information answers OEA's questions and facilitates its environmental review process.

Please don't hesitate to contact me if you have any questions.

Sincerely,



Jay C. Johnson

cc: Waymon T. Peer
Charles Tillotson
Celeste Bergeron
Cindy Gallo