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November 7, 2016

Ms. Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW, Room 1110
Washington, DC 20423-0001

Re: STB Docket No. FD 34284, Southwest Gulf Railroad Company

Dear Ms. Wood:

This will respond to Robert Fitzgerald's September 30, 2016 letter on behalf of the Medina County Environmental Action Association (MCEAA) to the STB and others concerning changes made the location of the loading loop for the Southwest Gulf Railroad line in Medina County. By that letter, MCEAA requests that supplemental environmental analysis be undertaken by the Surface Transportation Board. As you know, the Board completed an Environmental Impact Statement for this project in May 2008 and issued a final decision approving construction of the SGR rail line in December 2008. The U.S. Court of Appeals for the Fifth Circuit affirmed the Board's decision in *MCEAA v. STB*, 602 F.3d 687 (5th Cir. 2010). In recent months, SGR has been acquiring property for construction of the rail line and the loading loop, and implementing the Programmatic Agreement that is in place for this rail line project.

No supplemental environmental analysis is required. The shifting of the loading loop tracks proximate to the quarry being served by the SGR line to a new location just east of the location originally contemplated by SGR will have no adverse environmental impacts and in fact is environmentally preferable for the reasons discussed below.

During the course of negotiating with property owners affected by the proposed alignment of the SGR line, SGR (or its parent, Vulcan Materials Corp.) had the opportunity, not previously available, to purchase the property on which the loading loop will be relocated. That property is located east of the originally proposed loading loop location. A detailed map showing new and prior locations of the loading loop is attached.

In the course of the due diligence process associated with the purchase of this property, it was determined by SGR that this newly available acreage would facilitate a new, eastern location for the loading loop that would further minimize impacts to sensitive features of the area. Specifically, SGR determined as follows relative to the prior and new loading loop locations:

- Flood Plain designation for both Zone A and X surrounded the originally proposed loop location. By relocating to the new, eastern location, this impact was completely eliminated since the new eastern location is entirely outside the Flood Plain Boundaries.

- Elm Creek and Polecat Creek (tributary to Elm Creek) both would require crossings prior to entering the originally proposed loop location. By relocating to the eastern location, all creek crossings were eliminated.

- The Edward Aquifer Recharge Zone was impacted by the originally proposed loop location. By relocating to the eastern location, the impacts to the Edward Aquifer Recharge Zone will be reduced.

- Bridge construction was planned to access the originally proposed loop location. By relocating the loop to the eastern location, no bridge construction is required to support the railroad alignment to/from the loop location.

With the reduction of impacts as described, the relocation of the proposed loop was determined to be in the best interest of the environment and the surrounding area. Further, SGR has not identified any environmental detriment from relocating the loop to the eastern location and MCEAA does not identify any such detriment. SGR will of course adhere to all mitigation measures specified in the STB's December 18, 2008 final decision addressing the construction of the rail line and loading loop, including Measures 78 and 79, which address Karst features relative to the loading loop.

Further, in August 2016 Vulcan submitted a new Water Pollution Abatement Plan to the TCEQ for approval of the move of the loading loop to the eastern location. That application remains pending. Vulcan has also received an amended air quality permit from the TCEQ based on the relocation of the loading loop.

Finally, the relocation of the loading loop to the east will not require any change to the location of the rail line studied by the STB or to the location of the quarry or any quarry-related

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facilities. Nor will it have any impact on the volume or nature of the traffic handled by the line, on the loading process or on rail operations.¹

Please advise if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David H. Coburn", with a long, sweeping horizontal line extending to the right.

David H. Coburn

cc: Vicki Rutson, STB
Cathy Nadals, STB
Charlene Dwin-Vaughn, ACHP
Bill Martin, SHPO
Dawn Whitehead, USFWS

¹ It bears note that the rail operations on the rail loop will consist entirely of loading of rail cars. The loop thus constitutes industrial track.

