

#E1-2716
RJ

Attn: Ms. Rini Ghosh
Surface Transportation Board
Washington, DC 20423-0001

Received
1/29/07

23 January 2007

Re: STB Docket No. FD 34284

Dear Ms. Ghosh:

My wife and I reside at 776 CR 354, Hondo, TX., which is about one mile from the proposed quarry in Quihi and about one-half mile from any of the seven proposed rail routes. Our home of sixteen years is located on property that has been in our family since 1881 and recognized by Texas Family Land Heritage. From our home location, one can clearly see that our property and way of life is in jeopardy regardless of route selection.

While the SDEIS is improved over the DEIS with its published data and quality of printing, many subjects were often repeated, many others not presented, and data is often clearly skewed. Some conclusions are waiting for future data and future analysis by FEMA and Corps. Many conclusions are made and glossed over with terms like BMP, but did not fully define these practices with details. Some prior comments do need repeating as these comments on major controlling effects were ignored or omitted on the DEIS and SDEIS.

The following additional analysis should be added by SEA on this project study:

1. Medina county growth was used in analysis while the SGR is in northeastern Medina county where the growth is 2-3 times the county average.
2. Flood data maps and other flood data were not up-to-date.
3. Accident rates and data were out of date. No railroad bridge data included. Bridge distances and/or heights add to accident exposures.
4. Local truck shipments by the quarry varied greatly and often did not reflect the 10% or 85 trucks per day as per EI-28, Feb. 27, 2003.
5. Quarry blasting data was not fully presented or analyzed and it appears that Vulcan biased data was used. (EI-2189).
6. Marshaling plans of trains and railroad cars are not included. Train wait times for pick up and locations of idle trains on SGR should be used in impacts. Idle trains produce vibration plus noise and could wait for crews and traffic clearance for hours.
7. Safety data did not reflect UP operations. Several SGR references noted this tie-in with UP possible operations of SGR.
8. Trestle bridge and culvert clean-up was omitted, but did repeat weed control many times.
9. Historical wells and fences not included in rural analysis.
10. Average plus minimum speed of trains entering and exiting the quarry and the UP line not included. Vehicle data studies incomplete. (page 82-83, SDEIS. Appen. B)

11. Wells along railroad right of way not cataloged and located. This well data should include all aquifers.
12. Flooding and water shed not fully included and analyzed.
13. No comments are extended on who or what could be the added carrier on this SGR. Have any questions been posed by STB or others for this information. All types of data presented by STB and SGR was presented as averages, projections, extrapolations, forecasts, etc. for 40-50 years in the future, but no information could be examined for other carriers although this permit presents itself as a common-carrier. Where are the environmental impacts of others to be using this rail? Should this existing impact be increased by some factor of 2-3? Could historical railroad data be used? Vulcan expresses ideas about potential other shippers in several letters and even location on SGR.
14. Grade-crossing safety and numbers are glossed over and not complete. Traffic numbers do not include local market Vulcan trucks plus employ vehicles with the rail routes analysis. Grade crossing statistics were not used for Texas records nor were they adjusted to reflect UP records in this area.

Mitigation:

All mitigation should be re-examined on issues of safety, out of pocket cost to tax-payers, impacted land owners, and to issue detailed complete information to all governments for planning the project.

It is clear that Vulcan's intent with its action is to dilute and reduce meaningful mitigations. Vulcan seeks to have tax-payers pay for many of the needs of the project. The rail route should be selected and then mitigated or mitigated separately by route so comments are not elusive. (Indirect impacts)

1. Impose mitigation on the loading loop at the quarry to require vibration, noise traffic, and flooding environmental conditions are met.
2. Impose mitigation on future carrier to insure that EIS is prepared so that no fast track analysis is made at the expense of environment.
3. In Vulcan's letter to STB, May 25, 2006, it describes some of the details for their blasting to fracture limestone at the quarry. This blasting data sums to 10.6 tons of explosive per event and thus some 13,000 events over the next 50 years. Should these vibrations and the noise be acknowledged as to railroad cumulative analysis? Impose mitigation along north end of track to protect track.
4. Water wells, both Edwards and Leon Gravel, should have imposed mitigation on areas adjoining the railroad. This should be cataloging all wells of any type within ¼ mile of railroad. (See Edwards Aquifer letters EI-55)

4. (cont'd.) As necessary, some wells should be properly plugged and then relocated for the owner. Note that the shallow wells range from 10-50 feet deep and the Edwards wells near the quarry are only 200-400 feet deep. (See EI-656 Edwards Aquifer).
5. Vehicular Delays: On SDEIS page 4-15, on average each train would block an intersection at grade crossing for approximately four minutes causing some traffic delay. Impose mitigation on all crossings with over four minute delays to include grade^{separation} crossings. Surely trains entering and exiting the quarry at CR 353 will not have an average speed of 25 mph. The train entering or leaving the quarry would be estimated to have an average speed of 6 mph or less resulting in at least a sixteen minute delay with no interrupted movements. Should any train find it necessary to start and stop with cars crossing CR 353 and quarry entrance, then the delay would be much longer. This same type of delay could be caused at UP railroad junction. Again a long vehicular delay. This problem has been posed to you in the past and no reply has been forth coming. Note (see page 82 SDEIS). None of these delays have been increased for growth of other carrier on local road activities and thus could be greater than sixteen minutes at several road crossings. Should other crossings have delays over four minutes, then the carrier should build grade^{separation} crossings at their expense and not at the tax-payers expense.
6. Trestle bridge debris collected should be cleared and removed by Vulcan similar to or in conjunction with weed control program.
7. Immediately upgrade all roads as per map (figure 4.17-2)VCM. These routes were reviewed on page 4-107 SDEIS.
8. Distribute maps with locations, elevations, and dimensions of all bridges to be used for analysis. It appears from materials presented that low water crossing rail lines could be used also.
9. Span bridges should be constructed to reduce flooding exposure

I believe the all-truck route is the most satisfactory for the following reasons:

1. Smaller eminent domain issues.
2. Smaller additional properties would need to be obtained and land divisions would not be required.
3. This all-truck plan by Vulcan is a hollow threat, and the chances of actual construction and sustained operation is very small. The 50-year quarry would seek other plans and solutions.
4. Existing roads of travel already exist.
5. Local and state government controls could be used quicker and more readily.
6. It spreads the overall impact to a wider area.

Rini Ghosh, STB, 23 Jan 07, (page 4)

7. If this selection did come to pass, it would result in more information with publicity to others.
8. All safety would be more transparent and advertised.
9. Several overpasses would be demanded for added traffic.
10. More direct historic input and local actions for Quihi from state and county.
11. This operation, if built, could not survive and be sustained. Logistics would be very expensive for equipment and fuels.
12. Fewer impacts to property owners lands, buildings, and homes.

Should it be necessary to pick one rail route of SGR of the seven proposed rail routes, all about one-half mile from my home, I would select the eastern course "MCEAA Medina Alternative" as it is less offensive to Quihi environments. The rail route with my most objections is the "Vulcan Proposed Route" as it most endangers cultural resources, aggravates flooding, and increases traffic congestion.

All these conclusions are made realizing it is not a passing slight inconvenience, but will be everlasting. No one of Quihi residence will be free of everlasting results from this intrusive rail line that degrades our environments and way of life.

Yours truly,

cc: Senator John Cornyn
Senator Kay Bailey Hutchison
Texas Representative Tracy King
County Judge James Barden



Lester R. Landrum