

STEPTOE & JOHNSON <sup>LLP</sup>  
ATTORNEYS AT LAW

#E1-3225  
DAW

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November 15, 2007

Ms. Victoria Rutson  
Chief  
Section of Environmental Analysis  
Surface Transportation Board  
395 E Street, S.W.  
Washington, D.C. 20423

**Re: STB Finance Docket No. 34284, Southwest Gulf Railroad Company –  
Construction and Operation Exemption – Medina County, TX**

Dear Ms. Rutson:

In a letter dated July 21, 2007 and received by SEA on August 15, 2007, MCEAA asks once again that SEA further study the environmental impacts of the quarry as a so-called “connected action.” Specifically, MCEAA points to heavy rainfall and flooding that occurred in Texas in June and July, 2007 and asks that SEA study the question of whether the quarry will increase the risk or severity of flooding.

MCEAA’s letter overlooks several critical points. First, SEA already did look at the implications of the quarry on potential flooding in the area as part of the extensive cumulative impacts analysis it undertook. At page 4-108 of the Draft EIS issued in this proceeding, SEA stated as follows:

The proposed quarry would be built in the topographically higher elevations of the project site. Because of this only minor run-off water and water from direct rainfall would enter the area around the quarry. In addition, the use of Best Management Practices would prevent and control any stormwater run-off from the quarry site, as well as prevent the release of suspended sediment into local surface waters. Accordingly, no potentially significant adverse cumulative effects to water quality or surface water resources in the proposed project area are expected as a result of the quarry.

In the Supplemental Draft EIS, SEA re-adopted these same findings during the course of its consideration of the Eastern Alternative Routes. See SDEIS at page 3-52.

Second, MCEAA overlooks that Vulcan is required to obtain, and did obtain, from the Texas Commission on Environmental Quality, approval for a Water Pollution Abatement Plan (WPAP). In a September 14, 2006 letter to SEA reporting on TCEQ's approval of that plan (over the objection of MCEAA), Vulcan explained that the WPAP addresses stormwater runoff issues and requires the use of Best Management Practices by Vulcan at the quarry to, among other things, limit the risk of stormwater runoff at the quarry site.

Third, Vulcan is engaged in active consultations with the Medina County Floodplain Administrator about the design of the quarry so as to address any concerns that the Administrator might have. SGR has also committed to consult with the Floodplain Administrator and the U.S. Army Corps of Engineers to ensure that its rail line does not contribute to flooding, as is obligated to do so by proposed Mitigation Measures 24 (Floodplain Administrator permits required) and 25 (Corps of Engineers permits required). As noted in the SDEIS, SEA, through consultation with the Federal Emergency Management Agency (FEMA), has confirmed that Medina County participates in National Flood Insurance Program. In order for any community to participate in the program, that community must have regulations that meet the federal requirements for flood plain management and appoint a Floodplain Administrator who has the responsibility, authority and means to implement those regulations, as Medina County has done. See 44 C.F.R. § 59.22. The federal requirements for flood plain management are described in 44 C.F.R. Part 60. Consistent with these requirements, the Medina County Floodplain Administrator's duties include, but are not limited to, determining the boundaries of special flood-hazard areas and whether a project is in such an area, reviewing and acting on permits, and maintaining the carrying capacity of watercourses. See, e.g. Texas Commission of Environmental Quality, *Floodplain Administrator's Handbook* (2006). The Floodplain Administrator has detailed knowledge of the local flooding issues and the related federal, state and local regulations relevant to flood plain management. Thus, the Floodplain Administrator has both the knowledge and the authority to address any flooding issues and issue the permits that SGR must obtain for each floodplain crossing under recommended Mitigation Measure 24.

Fourth, relative to the rail line, SEA carefully studied the impacts of the line on surface water and flooding and has already imposed several mitigation measures described in the DEIS and SDEIS. In addition, SGR has offered extensive voluntary mitigation to address surface water and wetlands issues, and this mitigation has been incorporated into the proposed mitigation for the rail line. See proposed Mitigation Measures VM 2 and 20-32.

Finally, in the MCEAA letter noted above and in various other comment letters submitted to SEA, it is suggested that the rail line loading loop and the plant facility are located on a floodplain. This is also suggested by Figure 3-4 of the Supplemental Draft EIS. In fact, based on more refined engineering work done to date, neither the loading loop nor the plant facility will be located in the floodplain. The attached map makes this clear. This map reflects the

Ms. Victoria Rutson  
November 15, 2007  
Page 3

actual planned location of the loading loop and maintenance facility and is fully consistent with the prior comments of Vulcan/SGR in this proceeding that it would seek to avoid placing structures in the floodplain.

Please advise if you have any questions. .

Respectfully,

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

David H. Coburn  
Attorney for Southwest Gulf Railroad

cc: Ms. Diana Wood  
Ms. Jaya Zyman-Ponebshek

1st Row  
for left

UNNAMED TRIBUTARY  
TO POLECAT CREEK

WZB-2

(11) 100yr Ws ELEV = 970.65

(10) 100yr Ws ELEV = 96

WZ-S  
(GD)

(12) 100yr Ws ELEV = 972.01

(9) 100yr Ws ELEV = 971.00

EXISTING FEMA ZONE A  
FLOODPLAIN-MEDINA COUNTY  
FIRM # 480472015013  
DATED: AUGUST 15, 1980

PRELIMINARY  
100 YEAR FLOOD  
PER STUDY BY  
DESCAMPS ENGI

COUNTY ROAD 252

WZ-S60  
(SF)

WZ-S52  
(GD)

Stockpile Area  
10.7 ac

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

Animal Burrow

CL-35

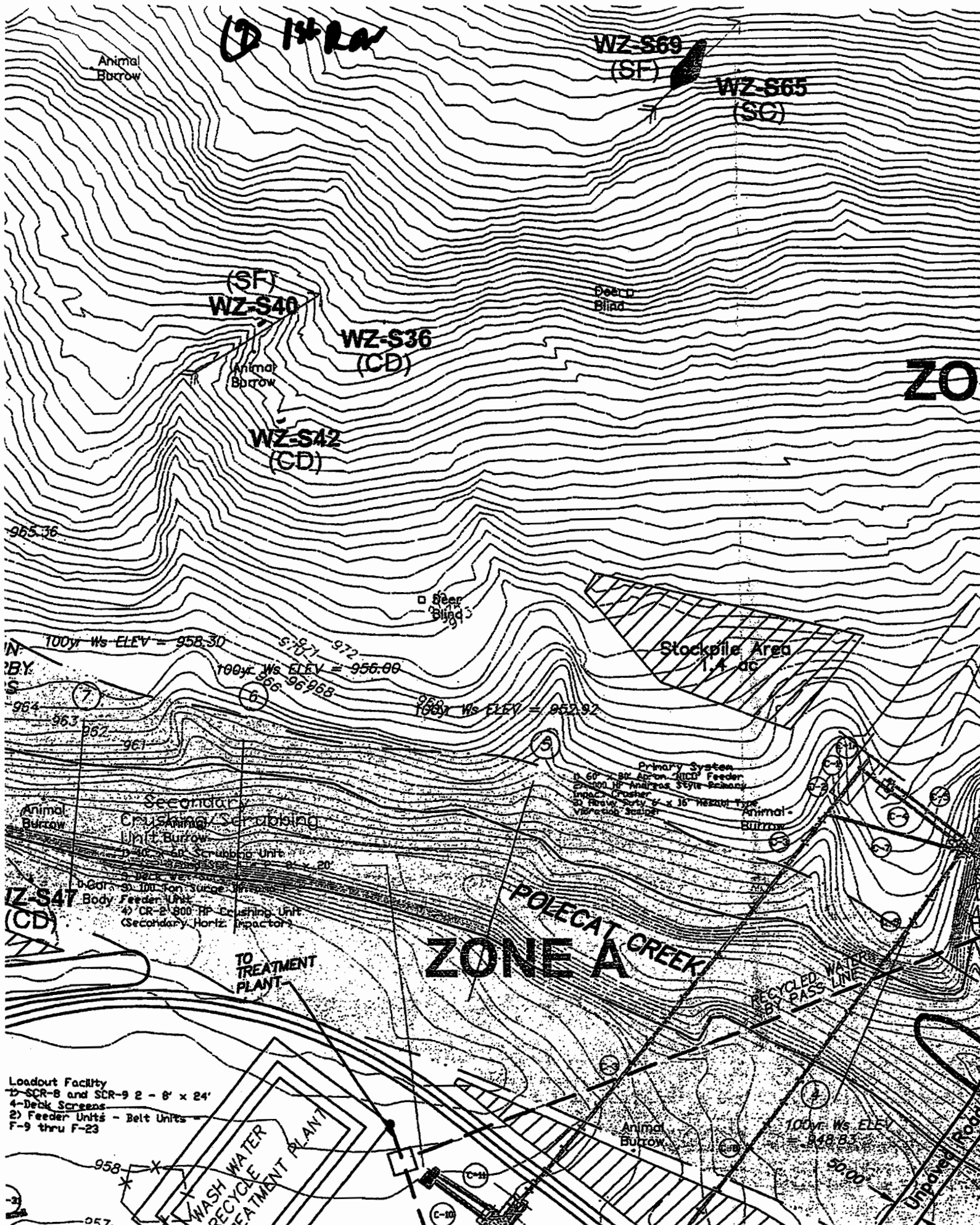
CL-36

CL-37

CL-38

CL-39

CL-40



(D) 142a

Animal Burrow

WZ-S69 (SF)

WZ-S65 (SG)

(SF) WZ-S40

WZ-S36 (CD)

Deer Blind

ZO

WZ-S42 (CD)

Deer Blind

Stockpile Area 1.4 ac

100yr Ws ELEV = 958.30  
100yr Ws ELEV = 956.00

100yr Ws ELEV = 952.92

Animal Burrow

Secondary Crushing/Screening Unit

2-40' x 60' Scrubbing Unit

3-100-ton surge hoppers

4) CR-2 800 HP Crushing Unit (Secondary Horiz Impactors)

WZ-S47 (CD)

Primary System  
1-60' x 80' Apron Feeder  
2-600 HP Anderson Style Rotary Impact Crusher  
3-Feeder Units 6' x 16' Mesabi Type Vibrating Screens

Animal Burrow

POLECAT CREEK  
ZONE A

TO TREATMENT PLANT

RECYCLED WATER BY PASS LINE

Loadout Facility  
1) SCR-8 and SCR-9 2 - 8' x 24'  
4-Deck Screens  
2) Feeder Units - Belt Units F-9 thru F-23

WASH WATER RECYCLE TREATMENT PLANT

Animal Burrow

100yr Ws ELEV = 848.83

Unpaved Road

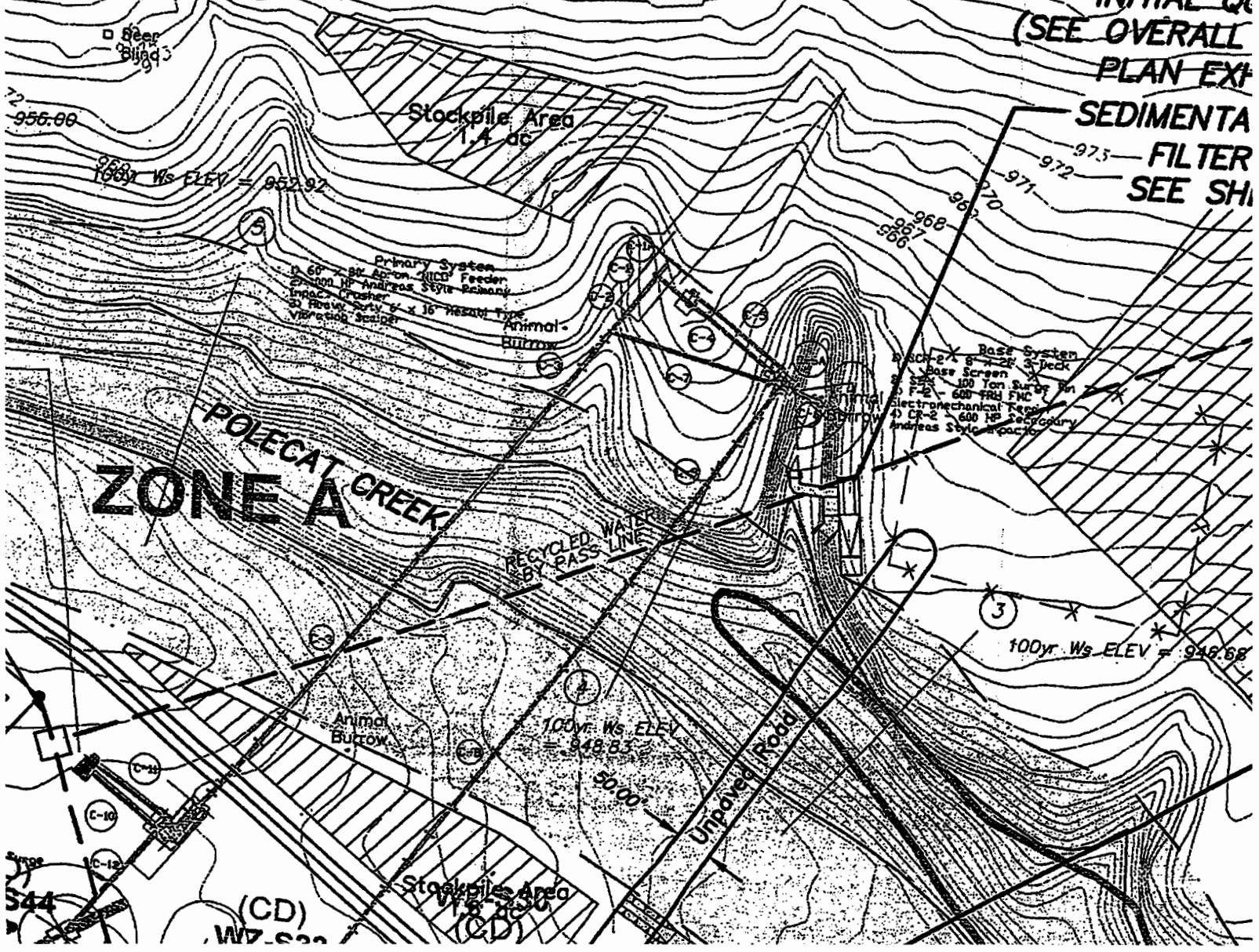
WZ-S69 (SF)  
WZ-S65 (SC)

WZ-S36 (CD)

Deer Blind

# ZONE C

INITIAL Q  
(SEE OVERALL  
PLAN EX)  
SEDIMENTA  
FILTER  
SEE SH



(4) 1st ROW

Animal  
Burrow

Kdvru

TIAL QUARRY PIT  
OVERALL QUARRY SITE  
AN EXHIBIT 2.1)

SETTLING POND IN MINED OUT-PIT  
(SEE OVERALL QUARRY  
SITE PLAN EXHIBIT 2.1)

IMENTATION AND SAND  
-FILTER BASIN "B"  
SEE SHEET 8 OF 9

TO SETTLING POND

WZB-1

Animal  
Burrow

Deer  
Blind

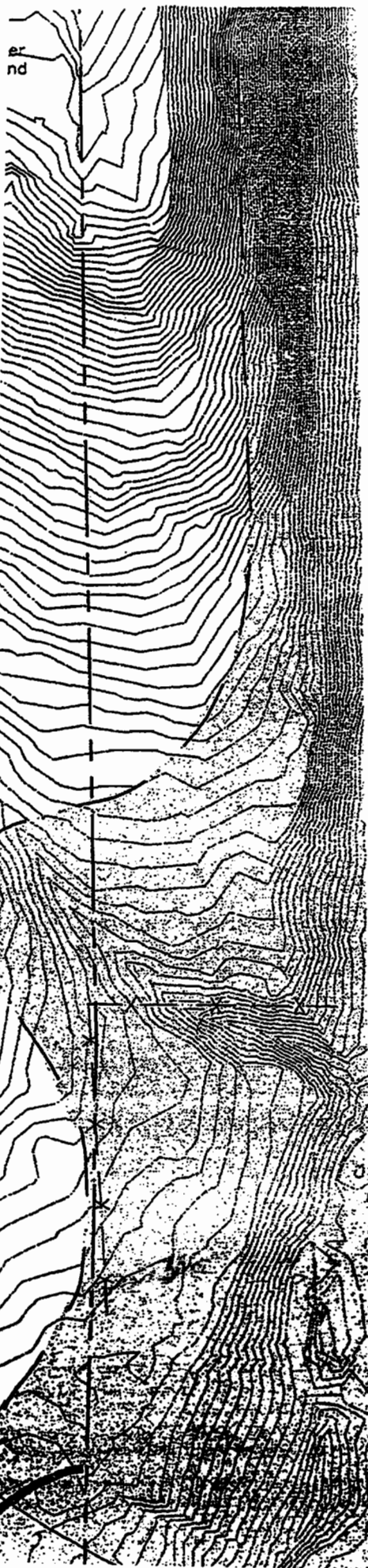
Stockpile Area  
38.2-60

ELEV = 948.68

SEDIMENTATION AND SAND  
FILTER BASIN "A4"  
SEE SHEET 8 OF 9

(2)

100% W6 ELEV = 947.33



(5)  
1st Row



## LEGEND



FLOOD STUDY SECTION

12

FLOOD STUDY SECTION L



PRELIMINARY 100 YEAR  
PER STUDY BY OVERBY



EXISTING FEMA ZONE A

WZ-S50  
(CD)

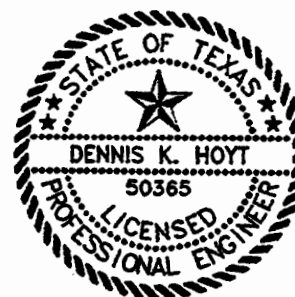
EXISTING GEOLOGICAL FE



FORCE MAIN BY VULCAN

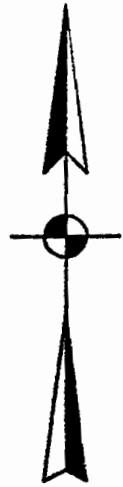
| Conveyor # | Conveyor Belt Description                    | Belt Size<br>BW x<br>Length |
|------------|----------------------------------------------|-----------------------------|
| C-1A       | Dribble Collection Conveyor                  | 48" x 25'                   |
| C-1        | Reversible Scalping Collection Conveyor      | 60" x 30'                   |
| C-2        | Crusher Discharge Conv. Belt                 | 60" x 60'                   |
| C-3        | Main Transfer Belt to Scrubber               | 48" x 950'                  |
| C-4        | Main Transfer Belt to Base Plant             | 36" x 245'                  |
| C-5        | Oversize Base Recrush Belt                   | 36" x 155'                  |
| C-6A       | RIP/RAP Transfer Belt                        | 36" x 30'                   |
| C-6        | RIP/RAP Oversize Belt                        | 36" x 80'                   |
| C-7        | Base Plant Return Belt to C-3                | 36" x 240'                  |
| C-8        | Base Product Transfer Belt                   | 36" x 1045'                 |
| C-9        | Base Product Stacker                         | 36" x 150'                  |
| C-10       | Scrubber Oversize to Secondary Crushing Feed | 36" x 125'                  |
| C-11       | Secondary Crushing Return Belt               | 36" x 160'                  |
|            |                                              | 42" x 230'                  |

REVISED 06/28/06  
03/09/06



LG  
First Row

*Dennis K Hoyt*



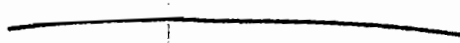
# LEGEND



FLOOD STUDY SECTION

12

FLOOD STUDY SECTION LABEL



PRELIMINARY 100 YEAR FLOODPLAIN  
PER STUDY BY OVERBY DESCAMPS



EXISTING FEMA ZONE A FLOODPLAIN

WZ-S50  
(CD)

EXISTING GEOLOGICAL FEATURE



FORCE MAIN BY VULCAN

## REVISIONS

REMOVED PER TCEQ COMMENTS

06/28/06



11815 WARFIELD  
SAN ANTONIO, TX 78216  
Tel: (210) 828-3520  
Fax: (210) 828-3599  
ode@overbydescamps.com

| Conveyor # | Conveyor Belt Description                    | Belt Size<br>BW x<br>Length | Belt<br>Capacity<br>TPH |
|------------|----------------------------------------------|-----------------------------|-------------------------|
| C-1A       | Dribble Collection Conveyor                  | 48" x 25'                   | 25                      |
| C-1        | Reversible Scalping Collection Conveyor      | 60" x 30'                   | 800                     |
| C-2        | Crusher Discharge Conv. Belt                 | 60" x 60'                   | 1500                    |
| C-3        | Main Transfer Belt to Scrubber               | 48" x 950'                  | 1500                    |
| C-4        | Main Transfer Belt to Base Plant             | 36" x 245'                  | 800                     |
| C-5        | Oversize Base Recrush Belt                   | 36" x 155'                  | 600                     |
| C-6A       | RIP/RAP Transfer Belt                        | 36" x 30'                   | 100                     |
| C-6        | RIP/RAP Oversize Belt                        | 36" x 80'                   | 300                     |
| C-7        | Base Plant Return Belt to C-3                | 36" x 240'                  | 600                     |
| C-8        | Base Product Transfer Belt                   | 36" x 1045'                 | 800                     |
| C-9        | Base Product Stacker                         | 36" x 150'                  | 800                     |
| C-10       | Scrubber Oversize to Secondary Crushing Feed | 36" x 125'                  | 500                     |
| C-11       | Secondary Crushing Return Belt               | 36" x 160'                  | 500                     |
| C-12       | Main Product Stacker                         | 36" x 160'                  | 500                     |



SURVEYING

①

2nd Row

958  
957  
956  
955  
954  
953  
952  
951

WZ-S59  
(SF)

Unpaved Road

MULTIPLE LOW  
HEAD CULVERTS

Rail Road

Stockpile  
Area  
(2.8 ac)

WZ-S53  
(CD)

WZ-S50  
(CD)

100yr Ws ELEV = 939.84

COUNTY ROAD 252

RETENTION BASIN  
BASIN "A1"  
SEE SHEET 6 OF 9

100yr Ws  
ELEV = 944.33

100yr Ws  
ELEV = 942.99

UNNAMED TRIBUTARY  
TO POLECAT CREEK

COUNTY ROAD 351

WZ-S58  
(SF)

WZ-S21  
(SF)

WZ-S56  
(CD)

100yr Ws ELEV = 936.29  
100yr Ws ELEV = 935.18

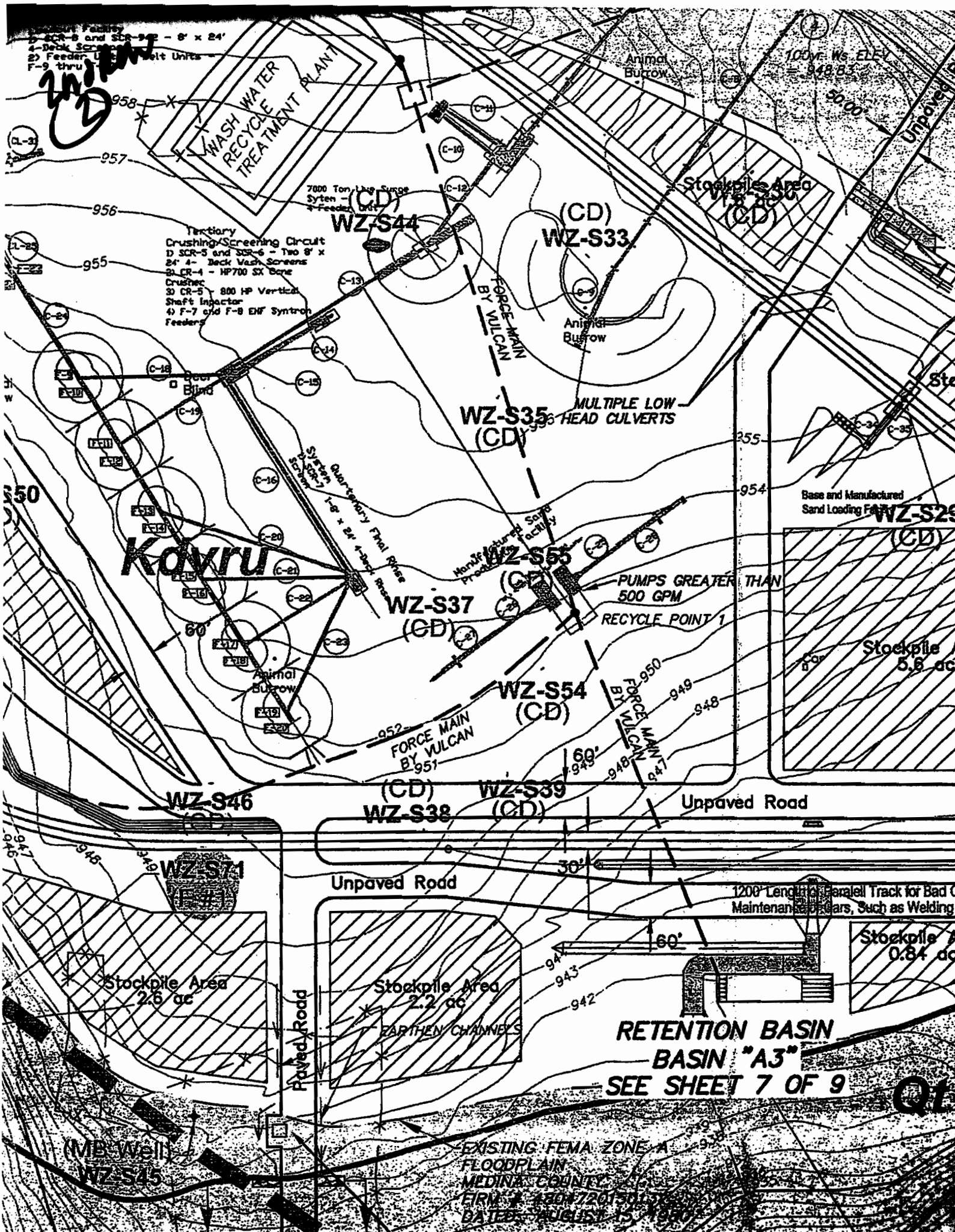
100yr Ws  
ELEV = 933.96

Animal  
Burrow

Deer  
Blind

Animal  
Burrow

L  
1  
4  
2  
F



Uniflow  
(3)

SEDIMENTATION AND SAND  
FILTER BASIN "A4"  
SEE SHEET 8 OF 9

Kdvru

(2)

100yr WS ELEV = 943.37

(1)

100yr WS ELEV = 940.90

Stockpile Area  
2.1 ac

EXISTING FEMA ZONE  
FLOODPLAIN  
MEDINA COUNTY  
FIRM # 480472015013  
DATED: AUGUST 15, 1980

EXISTING FEMA ZONE  
FLOODPLAIN  
MEDINA COUNTY  
FIRM # 4804720150  
DATED: AUGUST 15,

S29  
(2)

PRELIMINARY  
100 YEAR FLOODPLAIN  
PER STUDY BY OVERBY  
DESCAMPS ENGINEERS

le Area  
ac

(CD)  
WZ-S27

WZ-S19  
(CD)

WZ-S8  
(CD)

Bad Ordered Cars and Minor Deer  
Hiding (No Hydrocarbons) Blind

e Area  
ac

WZ-S17  
(CD)

ZONE A

Qa1

CREEK

Animal  
Burrow

Dam

Animal  
Burrow

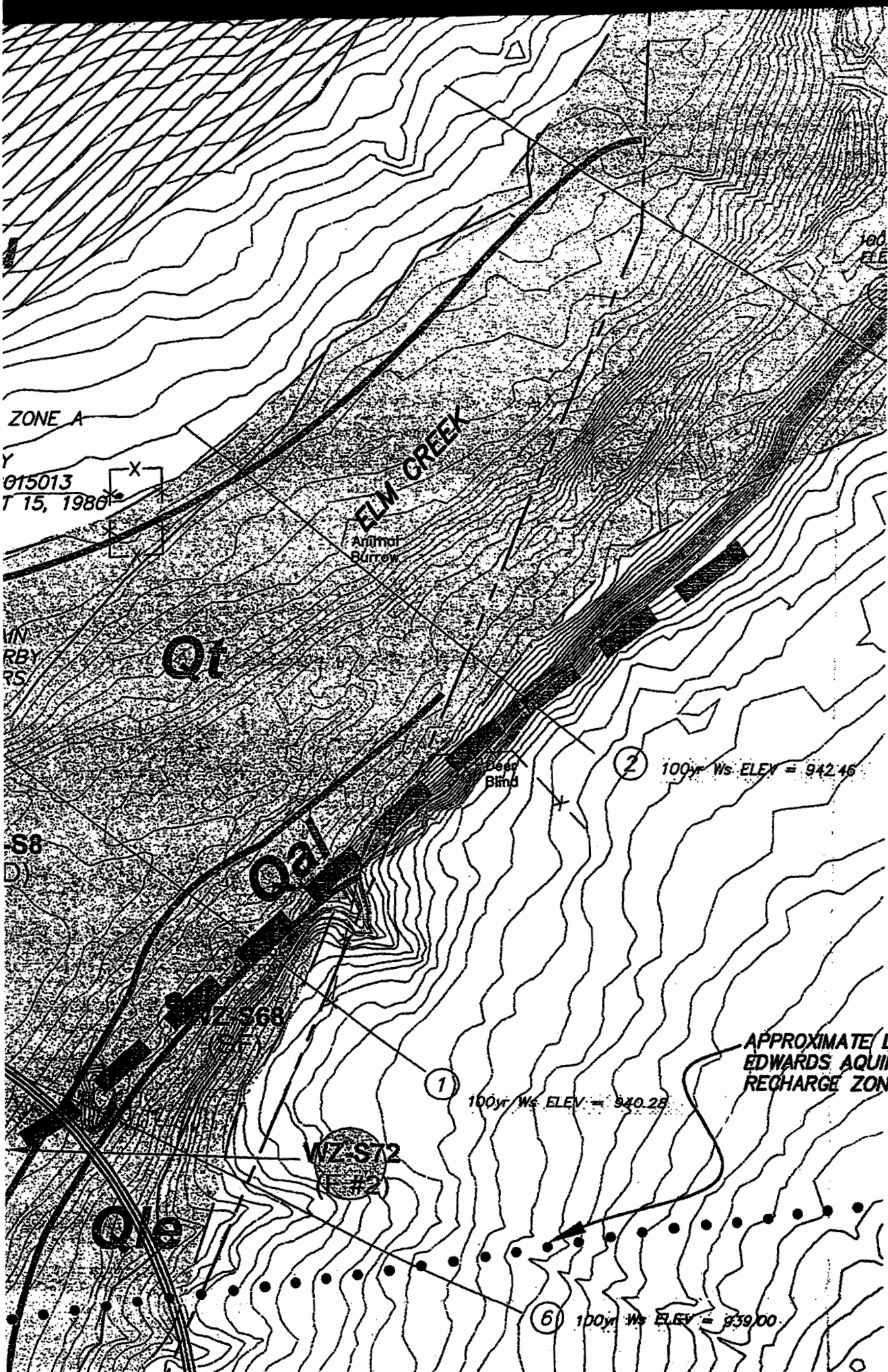
U

D

Animal  
Burrow

Animal  
Burrow

3rd  
2nd Row  
4



|       |                                                    |             |      |
|-------|----------------------------------------------------|-------------|------|
| C-1   | Reversible Scalping Collection Conveyor            | 60" x 30'   | 800  |
| C-2   | Crusher Discharge Conv. Belt                       | 60" x 60'   | 1500 |
| C-3   | Main Transfer Belt to Scrubber                     | 48" x 950'  | 1500 |
| C-4   | Main Transfer Belt to Base Plant                   | 36" x 245'  | 800  |
| C-5   | Oversize Base Recrush Belt                         | 36" x 156'  | 600  |
| C-6A  | RIP/RAP Transfer Belt                              | 36" x 30'   | 100  |
| C-6   | RIP/RAP Oversize Belt                              | 36" x 80'   | 300  |
| C-7   | Base Plant Return Belt to C-3                      | 36" x 240'  | 600  |
| C-8   | Base Product Transfer Belt                         | 36" x 1045' | 800  |
| C-9   | Base Product Stacker                               | 36" x 150'  | 800  |
| C-10  | Scrubber Oversize to Secondary Crushing Feed       | 36" x 125'  | 500  |
| C-11  | Secondary Crushing Return Belt                     | 36" x 160'  | 500  |
| C-12  | Main Surge Stacking Unit                           | 42" x 230'  | 1500 |
| C-13  | Main Tunnel belt to Tertiary Screen (SCR-5)        | 42" x 460'  | 1200 |
| C-14  | Return Belt to Tertiary Crushing Units             | 36" x 200'  | 800  |
| C-15  | Tertiary Crushing Product to SCR-6                 | 36" x 242'  | 800  |
| C-16  | Main Transfer to Quarternary Tower                 | 36" x 390'  | 800  |
| C-17  | Not Available - Eliminated in Refined Plant Design |             |      |
| C-18  | 1-1/2" x 1" Product Stacking Conveyor              | 30" x 295'  | 300  |
| C-19  | 1" x 3/4" Product Stacking Conveyor                | 30" x 261'  | 300  |
| C-20  | 3/4" x 1/2" Product Stacking Conveyor              | 30" x 348'  | 300  |
| C-21  | 1/2" x 3/8" Product Stacking Conveyor              | 30" x 283'  | 300  |
| C-22  | 3/8" x 1/4" Product Stacking Conveyor              | 30" x 278'  | 300  |
| C-23  | 1/4" x 1/8" Product Stacking Conveyor              | 30" x 335'  | 300  |
| C-24  | Main Loadout Conveyor                              | 60" x 1010' | 3000 |
| C-25  | Manufactured Sand Transfer Belt                    | 36" x 40'   | 400  |
| C-26  | Manufactured Sand Transfer Belt                    | 36" x 40'   | 400  |
| C-27  | Manufactured Sand Radial Stacking Conveyor         | 36" x 150'  | 400  |
| C-28  | Manufactured Sand Radial Stacking Conveyor         | 36" x 150'  | 400  |
| CL-25 | Loadout Bypass Belt                                | 60" x 150'  | 3000 |
| CL-26 | Transfer Belt                                      | 48" x 133'  | 1500 |
| CL-27 | Transfer Belt                                      | 48" x 133'  | 1500 |
| CL-28 | Bypass Transfer Conveyor                           | 48" x 21'   | 1500 |
| CL-29 | Bypass Transfer Conveyor                           | 48" x 21'   | 1500 |
| CL-30 | Transfer Belt to Loadout Bin                       | 60" x 223'  | 3000 |
| CL-31 | Bypass Product Radial Stacking Conveyor            | 48" x 150'  | 1500 |
| CL-32 | Bypass Product Radial Stacking Conveyor            | 48" x 150'  | 1500 |
| CL-33 | Scale Loadout Belt                                 | 60" x 80'   | 3000 |
| CL-34 | ManSand/Base Rail Loading System Belt              | 60" x 20'   | 1500 |
| CL-35 | ManSand/Base Rail Loading System Belt              | 60" x 130'  | 1500 |

### LEGEND

|            |                                        |
|------------|----------------------------------------|
| — X —      | FENCE                                  |
| — OE —     | OVERHEAD POWER LINE                    |
| ⊙<br>PP    | POWER POLE                             |
| — T —      | TELEPHONE LINE                         |
| ●<br>BHM-1 | COREHOLE DRILLED BY VULCAN MATERIALS   |
| —          | FORMATION CONTACT                      |
| ↗          | LINEATION IN EXPOSED LIMESTONE BEDROCK |

### GEOLOGIC FEATURES

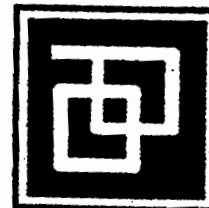
|      |                                                                                            |
|------|--------------------------------------------------------------------------------------------|
| (CD) | NON-KARST CLOSED DEPRESSION                                                                |
| (F)  | FAULT. DASHED WHERE INFERRED. U AND D INDICATE UPTHROWN AND DOWNTROWN SIDES, RESPECTIVELY. |
| (MB) | MANMADE FEATURE IN BEDROCK                                                                 |

11815  
SAN  
Tel:  
Fax:  
ode

2nd Row  
5

**OVERBY  
DESCAMPS  
ENGINEERS**

CIVIL ■ ENVIRONMENTAL ■ SURVEYING

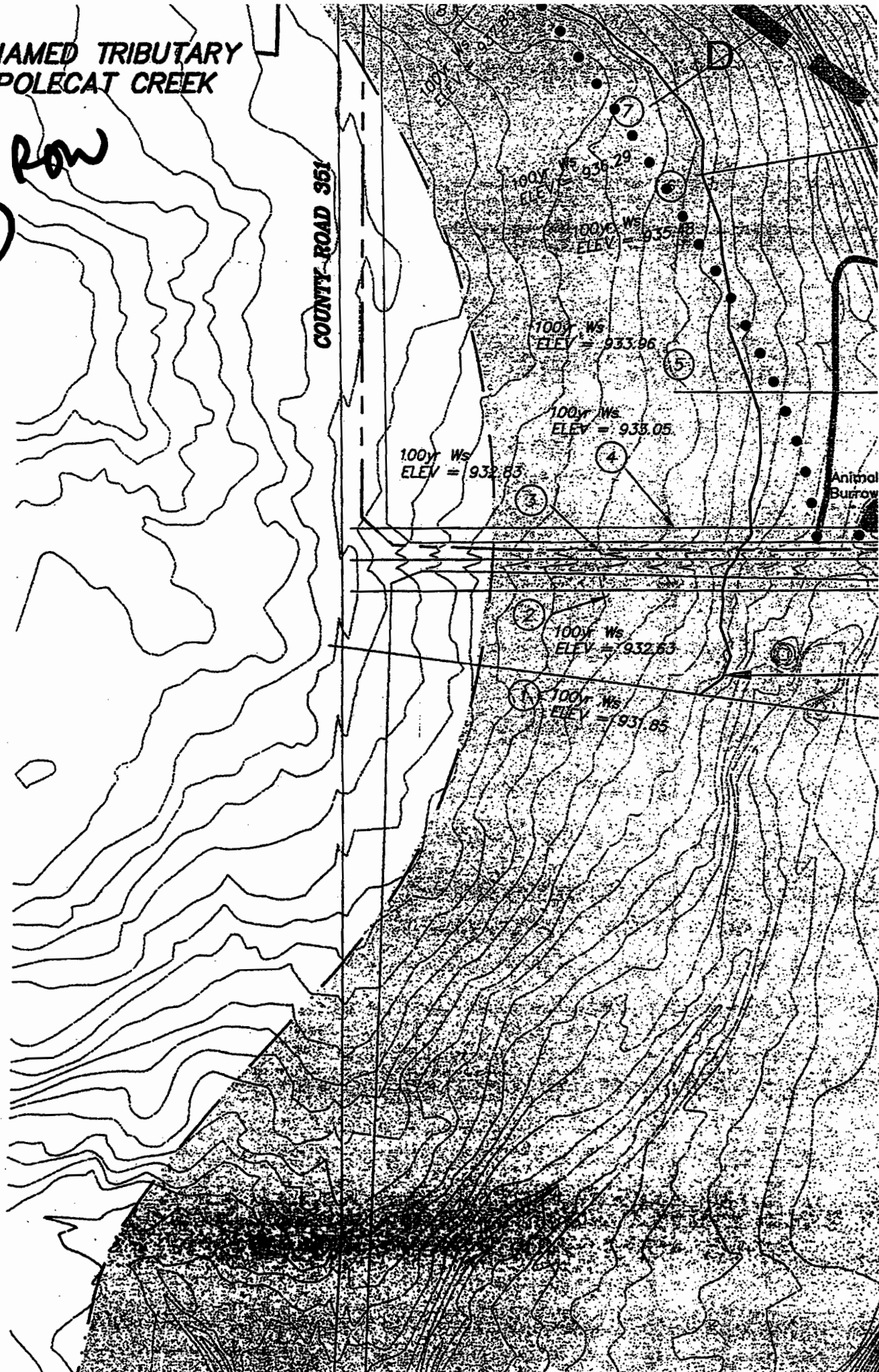


lina Quarry  
t Area

UNNAMED TRIBUTARY  
TO POLECAT CREEK

30 ROW  
①

COUNTY ROAD 361



Stockpile Area  
2.6 ac

Stockpile Area  
2.2 ac

EARTHEN CHANNELS

RETENTION BASIN  
BASIN "A3"  
SEE SHEET 7 OF 9

(MB Well)  
WZ-S45

EXISTING FEMA ZONE A  
FLOODPLAIN  
MEDINA COUNTY  
FIRM # 480472015013  
DATED AUGUST 15, 1980

12 Visitor Parking  
Spaces, Scale House  
& Office

Qt  
WZ-S1  
(CD)

Animal  
Burrow

COUNTY ROAD 353

Plant Entrance

PRELIMINARY  
100 YEAR FLOODPLAIN  
PER STUDY BY OVERBY  
DESCAMPS ENGINEERS

APPROXIMATE LIMIT OF  
EDWARDS AQUIFER  
RECHARGE ZONE

Access Road

Stockpile Area  
0.84 ac

WZ-S17  
(CD)

## Animal Buffow

# ZONE A

# Coal

## Animal Burrow

**Qt**

ELM CREEK

# Access Road

RECHARGE ZONE

100yr Ws ELEV = 940.28

WZ-S72  
(#2)

6 100yr Ws ELEV = 939.00

5 100yr Ws ELEV = 938.00

4 100yr Ws ELEV = 937.00

3 100yr Ws ELEV = 936.00

2 100yr Ws ELEV = 935.00

EXISTING FEMA ZONE A  
FLOODPLAIN  
MEDINA COUNTY  
FIRM # 480472015013  
DATED: AUGUST 15, 1980

COUNTY ROAD 555

Equipment Maintenance  
Parking and Above  
Ground Storage Tank  
Area Off Recharge Zone

FORMATION CONTACT

LINEATION IN EXPOSED LIMESTONE  
BEDROCKGEOLOGIC FEATURES

(CD)

NON-KARST CLOSED DEPRESSION

(F)

FAULT. DASHED WHERE INFERRED. U AND D  
INDICATE UPthrown AND DOWNthrown  
SIDES, RESPECTIVELY.

(MB)

MANMADE FEATURE IN BEDROCK  
WELL = WATER WELL  
PIT = ROCK-LINED PIT

(O)

OTHER NATURAL BEDROCK FEATURES:  
VUGGY ROCK, REEF DEPOSITS

(SC)

SOLUTION CAVITY

(SF)

SOLUTION-ENLARGED FRACTURE(S)

FEATURE THAT IS CONSIDERED TO BE  
SENSITIVESTRATIGRAPHY

Qal

ALLUVIUM

Qt

FLUVATILE TERRACE DEPOSITS

Qle

LEONA FORMATION

Kgt

GEORGETOWN FORMATION

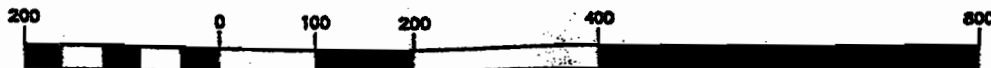
Kdvru

DEVILS RIVER LIMESTONE, UPPER

Kdvrl

DEVILS RIVER LIMESTONE, LOWER

## GRAPHIC SCALE



PROJECT NO. —

DATE 03/

Vulcan Materials, Medina Quarry  
Site Plan For Plant Area

3rd Rev  
(5)