

HEI-26126

Ms. Diana Wood
Surface Transportation Board
Office of Environmental Analysis
Washington, DC 20423

25 June 2017

Re: May 30, 2017 Draft Resolution Plan on SGR Right-of-Way
STB Finance Docket No. 34284

We received the draft resolution plan from David H. Coburn, attorney for SGR and first have questions on the letter and attachments.

1. Where is the draft introduction page with names, locations, etc. as was in February 2017 letter? Who did the study and preparation? Are signatures needed?
2. In general, maps are too small and difficult to note the full details. Some map details are hidden with posted small route sketches. Road numbers are very dim and blurry.
3. Programmatic Agreement (Appendix A) is blank. Should it read "see B-4"? as old agreement?
4. On August 12, 2016 Programmatic Agreement, page B-4, it indicates SGR seeks to construct and operate approximately 9 miles of single-track railroad while in project description on page 2 it is planned to extend for approximately 12.04 miles. The May 20, 2015 HDR letter from Clayton Tinsley to STB, page 1, denotes a new rail line of 14.53 miles.
5. The Texas Historical Commission letter of Justin Kockritz, Historian, is printed poorly and is difficult to read.
6. The 81 environmental mitigation measures should be included for quick reference
7. Each archeological site noted or enumerated should include Voluntary Mitigation Measures 2d, 2f, and 2g to insure high water protection. Elevated rail beds can change drainage and/or damming of waters that result in damage to the site..

New circumstances appear daily in UQRHD as SGR now has two quarry neighbors. The first road west, CR 351, has a new quarry, and the first road east, CR 265, is a new quarry under construction and is to be on line by winter 2017. These 3 quarries do directly add to the sum of undesirable effects. Three quarries produce traffic problems (safety, egress, ingress, safety waiting, noise, etc.). Three quarries produce added road repairs, road construction, and drainage, and also added enforcement. Added fencing, gates, wells, water lines for livestock will be needed. We must realize that the planning of a 50-year railroad must reflect the past and the future. The 2003 fifty-year SGR plans have substantially changed and are new and precarious. We are asked to review 20 years of folly with incomplete plans that have major impact. As relayed in the past, local citizens do know that a railroad plus a Martin-Marietta quarry was installed in Medina county, and is now operating in about 5 years with little or no major objections.

Because the proposed project has whole power to effect the UQRHD, so other properties such as egress and ingress to the area should be considered. The trains entering and leaving the SGR loading loop could block a county road 353 twice in about 1 mile with

train lengths 1- 1.25 miles long. Total crossing time of this road could easily be 6 -15 minutes or more with each train, which is up to 24-60 minutes daily. SGR via Sgrr.com tells their local partnership "unit trains are expected to travel at an average speed of 20-25 mph and clear road crossings in approximately 3-4 minutes". The total roads crossed by each train trip is 18 (11 private +7 named roads). The three quarries could easily add over 500 truck trips daily. This sum of traffic does make an impact on this area. Simple landscape will not solve a fraction of the problems.

The planning and implementation of systems of vegetative buffers is very weak, undefined, and a makeshift solution. I would hope we are seeking sound 50+ year solutions and not just a token of greenery. The burden of care and the charge for this concealment would be left to owners while the problems still exist. This will not be effective.

The Resolution of Adverse Effect strategies appear less than sincere when offering to disseminate the problems with project booklets. Will these booklets subjects include pollution, eminent domain, covenants, road safety, etc.? These booklets should tell the real story and record this for time. Any story should be publicized and authenticated..

"Well, we know what ugliness is and the processes that create it. In the haste to gain material welfare we have forgotten, or chosen to forget; and the bill has now come due" by Freeman Tilden in Interpreting Our Heritage. SGR continues to fail to offer exact, sound, and workable solutions to save UQRHD eligibility for the National Register of Historical Places. Avoidance of the historical area by the proposed SGR or abandonment of the proposed SGR to save this Quihi-New Fountain Historic District and the archeological area is paramount to preserve Medina county part of Texas history.

cc: Texas Historical Commission
Justin Kockritz
P. O. Box 12276
Austin, Texas 78711-2276
cc: Advisory Council on Historic Preservation
Charlene Dwin Vaughn, AICP
401 F street Northwest, suite 308
Washington, DC 20001-2637

Lester R. Landrum
Joyce M. Landrum
Lester R. Landrum
Joyce M. Landrum
776 CR 354
Hondo, TX 78861