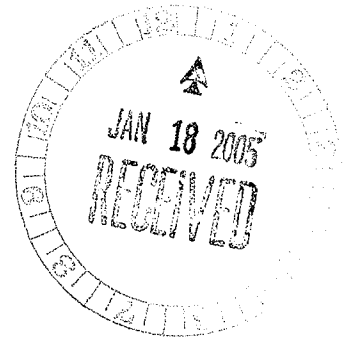




6.10-1.1-5

January 7, 2005

Ms. Rini Ghosh
Surface Transportation Board
Case Control Unit
1924 K Street, NW
Washington, D.C. 20423-0001

FD 34284

EI-1314

Dear Ms. Ghosh:

The purpose of this letter is to provide comments on the Surface Transportation Board (STB) Finance Docket No. 34284 regarding Southwest Gulf Railroad Company's proposed construction and operation of seven miles of railroad track in Medina County, Texas. On November 15, 2004, the Edwards Aquifer Authority (Authority) received the Draft Environmental Impact Statement (DEIS) from the Section of Environmental Analysis (SEA) of the STB. Authority staff has reviewed the DEIS and presents the following comments:

Regarding Section 4.5.2 Groundwater – Operational Impacts to Groundwater:

The second paragraph of this section (pg. 4.31) indicates that there is a small risk of petroleum entering groundwater and that to reduce the risk, fueling and maintenance of locomotives will be conducted in an area off of the Edwards Aquifer Recharge Zone (EARZ). Based on the geologic map presented on Figure 3.6-1 (pg. 3-39), it appears that the maintenance and fuel storage area will be located on an outcrop of Del Rio Clay immediately south the EARZ. Authority staff recommends that the maintenance and fuel storage area be located as far south of the EARZ as possible in an area that will drain away from the EARZ and in area where, at a minimum, the full thickness of Del Rio Clay is present. This precaution will provide additional protection for the Edwards Aquifer from spills at the maintenance and fueling facility.

Authority regulations prohibit the installation of new aboveground and underground storage tanks that contain hazardous materials on the EARZ. (EDWARDS AQUIFER AUTHORITY RULES, ch. 713, subch. G). Any excavations into Del Rio Clay that encounter Edwards Limestone will be considered as being on the EARZ; therefore, the installation of tanks containing regulated materials into any such excavation will be prohibited.

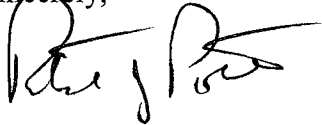


If the maintenance and fuel storage area must be located in an area of Del Rio Clay outcrop, Authority staff recommends that any storage tanks be constructed with tertiary containment. Many consider the Del Rio Clay to act as a barrier to contaminants and water from entering the Edwards Aquifer; however, naturally occurring fractured clays are not engineered fills and should not be considered as imparting protection to the Edwards Aquifer.

The referenced DEIS section also discusses the need for a Spill Prevention, Containment, and Countermeasures (SPCC) Plan. Authority staff emphasizes the need for an aggressive SPCC Plan for the portion of the rail line that crosses the EARZ. Due to the potential for rapid infiltration of any spills on the EARZ and due to the rapid groundwater flow rates in this karst aquifer, spill prevention will be essential to preventing aquifer contamination.

The Authority appreciates the opportunity to comment on the subject DEIS. If you have any questions regarding these comments, please contact Ms. Robin L. Tremallo, P.G., Environmental Coordinator, at (210) 477-5141, or by e-mail at rtremallo@edwardsaquifer.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert J. Potts', with a stylized flourish at the end.

Robert J. Potts
General Manager

RP:RLT:JRH/ev