

Exhibit 1 is too large to scan. Please contact
the Section of Environmental Analysis to view a copy.
Exhibit 2 originally in color.

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- *Quihi & New Fountain Historical Society*

- 202 CR 450

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January 21, 2007

Surface Transportation Board
Attn: Victoria Rutson
Section of Environmental Analysis
1925 K Street NW
Washington, DC 20423-0001

1/29/07

Re: Finance Docket #34284
Vulcan Materials/Southwest Gulf Railroad
Supplementary Draft Environmental Impact Statement (SDEIS)

Dear Ms. Rutson:

The Quihi and New Fountain Historical Society has the following comments to submit regarding the SDEIS:

Vulcan has submitted erroneous information regarding the number of trucks there will be each day, in addition to the rail line. They have stated there will be 24 trucks per day. It will actually be nearly 4 times that. They have stated that 10% to 15% of the production will be trucked to local markets. They have also stated that with no rail line there would be 850 trucks per day. If 850 trucks per day represented 100% of the transportation of product, then logically 85 trucks per day would be 10%. This gross understatement of traffic affects the traffic count, thereby affecting road upgrades that are projected to be needed, and the projected injuries and fatalities. The increase in vehicular traffic of the estimated 125 employees to and from the quarry was not noted, as well. Also, there is additional traffic that needs to be planned for from the growing subdivisions to the west of the proposed quarry site, as well as traffic from the Medina Oaks, Rocky Creek Acres, and Mountain View Subdivisions that use CR 265 as access to FM 2676. Could you please provide an accurate update on this information in road and bridges upgrades needed, and projected fatalities and injuries, in your final EIS?

We feel that there is a huge problem that has not been addressed yet regarding flooding that would be exacerbated by the placement of a rail line, and specifically by a rail loop, in this area. In March 2006, Overby and Descamps, Environmental Engineers, mapped the drainage area of the project area. This was submitted to the TCEQ as part of the WPAP. This map reveals that there is 18,301 acres of drainage upstream from the proposed rail loop on the southern end of the quarry site. This map indicates that there are 9 separate nodes that contribute to the drainage, all going through the planned quarry/rail loop site. When heavy rainfall occurs, floodwaters are funneled through the planned quarry site/rail loop area. Floodwaters then emerge from this area via the Elm Creek literally as a wall of water. Residents downstream from that point, along CR 351 and FM 2676 at Quihi, can actually hear the roar of the water as it comes through the Elm Creek, flowing south. The Quihi Creek joins the Elm just north of Quihi Lake, and both eventually join the Hondo Creek to the west at US Hwy 90. (Many pictures of the flooding, with their locations noted, were submitted on January 10, 2005, with comment on the Draft EIS.) Nothing can more vividly convey this information than the copy of the aforementioned map, showing the drainage area (upgradient areas)(Exhibit 1) Also enclosed is a copy of a map of the northeastern part of Medina County. On it, we have placed an illustration of the drainage area, and quarry area, as defined by the WPAP map. (Exhibit 2)

The flooding is real. We feel that there has not yet been enough attention given the flooding impacts. We want to know how Vulcan plans to control these floodwaters as they flow through the rail loop, as that will affect the very lives and homes and the many historic sites in the path of these floodwaters flowing south and westward. Does STB have any requirements for this? We will not accept 'Best Management Practices' (BMP) as an answer. We are very much aware of disasters that have happened, and are happening now, because such events were not anticipated and planned for. We are amazed that Vulcan would even consider placing a quarry and rail line in their chosen location, but are also reminded of the fact that Vulcan did not do much of its 'homework' in 1999 when scouting this area for their project.

We are very pleased that the Section 106 Cultural Rural Landscape study was done, and in such a thorough manner. We think this study accurately portrays the life and times of the early settlers to the present, and the evolution of agriculture, architecture, and the sense of community. We wish there were more information on the history of this area in Spanish Colonial and pre-history eras, as we have heard that there is very good evidence of significant habitation and events here. But we realize that all this cannot be investigated in the relatively short time allotted for such a study for the STB.

The SDEIS Section 106 Cultural Resources Study recognizes that the present day roads in the Quihi area are, for the most part, unchanged from the times of the settlers. We treasure this. This is part of our cultural landscape. We have documentation on the location of the historic General Wall's (Wool, Woll) Road, as it traversed through Medina County in the 1840's via Quihi itself and down CR 4516. We hope to preserve this as well.

We oppose having this project in this area. It was written in a prior letter to the STB by a renowned archeologist, Dr. Thomas Hester, P.H.D., (EI-1313, Nov 6, 2003) that Vulcan *couldn't have chosen a worse place in southcentral Texas for this quarry and rail project*. This is true from the standpoint of historical and archeological resources. In *December 2002*, Vulcan representative Tom Ransdell stated that he had no idea of the historic things in this area, which typifies another case of Vulcan not doing its homework before site selection. Close proximity of the Edwards Aquifer to the surface of the land at the quarry and rail loop area, and flooding of many creeks involved in the affected area, are among other things that should have been known by Vulcan before site selection. It is sad that we should have to figure out for Vulcan how to make their project work. We suggest that Vulcan go further west, to Knippa and beyond, where they say they are loved and wanted, instead of coming here. There is ample product out west, as well as rail availability.

We concur with SEA's recommendation that any route chosen would have to be away from the historic and archeological resources of the area, and that the eastern routes present the least harmful environmental impacts and thus should be selected. There is no way that the Vulcan/SGR Proposed Route could be changed or mitigated that would spare the historic and archeological resources it affects. The very presence of the rail and the train cars traversing it destroys the aesthetics of the historical area.

Thank you for the opportunity to submit comments for this SDEIS, and for the diligence SEA used in compiling it.

Respectfully,



Alyne Fitzgerald, President
Q&NFHS

CC: Senator John Cornyn
Texas Historical Commission, F. Lawrence Oaks, Executive Director

