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RJ

Surface Transportation Board
Case Control Unit
1925 K Street NW
Washington, DC 20423-0001
Attn: Rini Ghosh
34284

February 25, 2004

RE: STB Finance Docket No.

(Draft Scope)

Received
2/25/04

Dear Ms. Ghosh:

My name is Lester R. Landrum, and my wife and I reside at 776 CR 354 which is about 0.7 miles east of the proposed railroad and is about 1.5 miles southeast of the proposed quarry. I built my home here some 12 years ago on property that has been in my wife's family for 100 years and is recorded in the Texas Family Land Heritage Program.

The STB railroad-quarry facts sheet were incomplete and could produce less than accurate meanings in many cases. Many major and controlling issues were omitted on the facts sheet. I believe other meetings or a canvas of the area should be held to better accumulate concerns. It appears that a complete quarry design with exact equipment, exact quantities, and specific procedures is needed to evaluate, compare, study and judge. Written communication is not adequate. More adequate maps with details are needed for all proposed routes. All previous maps were cryptic and incomplete. Clearly the railroad and the quarry are joined by ownership and have operations concurrent, and/or connective to produce cumulative environmental impacts along with a combined economic impact. All railroad operations, equipment and capacity should be enumerated. All quarry operations, equipment, and capacity should be enumerated. The sum of these two operations would be used for actual cumulative impacts.

My major concern is the protection of the sole source Edwards Aquifer as we have several hundred users in this area. This aquifer meets the water needs of over one million users in a six county area of central Texas region and is the sole source of San Antonio, our nation's eighth largest city. In our area new heavy industry has the potential for serious damage and/or contamination to this aquifer; and once water in this vast reservoir becomes fouled it will be difficult, if not impossible, to clean; or once the underground strata is damaged it will be difficult to restore or repair. In the northern area of the proposed rail, the roof of this aquifer is only some 150-200 feet thick. This roof is in fault zones, with fissures, voids, caves, large sink holes, and is mainly porous, spongy carbonate deposits. Sink holes are common here where the land is underlain by limestone or other carbonate rocks.

Vibrations due to quarry explosions, excavations, material movements or train movements could readily influence the aquifer water turbidity or availability. With this porous roof, this recharge zone could easily transfer any surface contaminants into the aquifer. These contaminants could be train diesel fuels, lube oils, greases, anti-freeze, hydraulic fluids, nitrates, and any other material these trains would haul. Undetected contaminants could seep into the aquifer in only hours. With so much exposure, should test wells be required with analyzers, recorders, transmitters, and alarm systems to detect any contamination or damage to our thin roofed aquifer? Seismographs with referees should encompass this area for several miles. Shallow wells in the Leona Gravels Aquifer and around the project area could be disrupted. These springs feed Quihi Creek and various ponds and collection areas. Some owners use these wells for watering their livestock and for limited irrigation. These shallow waters feed the Quihi wetlands. Local maps of wells can be superimposed over your existing maps. Wild game and wild birds also use these waters for subsistence. Will the rail line alter this shallow water source, and could we need an alternate supply of

water? As with the Edwards Aquifer these wells and springs could also be easily fouled. Do we need test wells, analyzers, recorders, and alarms for these systems? The Glen Rose Aquifer is also on north boundary of the site. Areas just 35-40 miles away are experiencing major shallow well aquifer problems due to contamination in south Bexar county near Kelly Field. Costly cofferdams, test wells, evacuation wells are being installed and health research continues on these problems. It appears that this work will be ongoing for years with no total solution in sight. We should learn from their problems and mistakes. We cannot afford an aquifer disaster, big or small. As ground water receives increasing attention, particularly because of toxic chemicals contamination, a written legal document verifying an adequate water supply from new or old wells can be as important as a property deed.

Medina county FM 2676 runs north and at an angle to US 90 and joins SH 173 on the west at Hondo and joins FM 471 at Rio Medina on the east. Paved CR 4516 joins Quihi-New Fountain to Castroville and is just north of US 90 and intersects at Castroville. These two roads are arteries of a fast growing rural community that connects this area to San Antonio, Hondo, Castroville, Rio Medina, Devine, Bandera, etc. Without grade level separation road traffic problems and dangers for commuters, school buses, fire protection, medical services, police protection, farm-ranch machinery, local hay transfers, local grain shipments, local cattle shipments, and commercial traffic would be caused by one-mile long trains crossing these roads four times daily for 250 days per year or more. A letter from J. L. Randall, P.E., TxDOT on April 30, 2003 to US Surface Transportation Board outlined our above concerns and stated. This road has four school buses which travel along FM 2676 and cross it twice daily. "The combination of school children traveling along the route and the transportation of potentially hazardous materials present significant safety concerns at highway-rail grade crossings". This letter also said that in the United States, Texas ranked first in the number of grade crossing fatalities and that "Federal Railroad Administration is encouraging states to reduce the number of at-grade crossings by consolidating, closing, or with grade-separation wherever possible". This letter also noted a large agricultural supply and grain terminal on east end of FM 2676 but failed to add the terminal on the west end that also supplies significant quantities of fertilizer and insecticides to the local areas. Mr. Randall said in the last paragraph, "We are requesting that STB require SGR to construct a grade-separation at FM 2676 to eliminate all rail grade crossing conflicts". This same logic and conclusion should apply to other county roads on the considered Vulcan railroad. One proposed route crosses CR 353 twice in a distance of about two miles and then crosses FM 2676 in a few feet to compound the congestion. The FM 2676 is the major and only artery from this area. We cannot afford long trains at slow speeds to block this road with a grade crossing. The proposed train times or durations are not set, and no future expansion estimates were added. Traffic on CR 354 would have increases, and this road has three cattle guards with some 1.25-1.75 miles of open range. All comments cannot be formulated as the total quarry design and quarry operation procedures and philosophies are not presented.

The very dusty product of limestone in rail cars will impact air quality and will add to the cumulative effect of this quarry and others. Any air quality models should include the Mexico farmer fires in the Spring, the ozone alert effect in all adjacent counties, and auto emission testing on adjacent counties.

The cumulative noises related to rail shipments from expanded quarrying, added common carrier customers, and population expansion should be included; this noise level should also be adjusted for winter north winds, prevailing southeast winds, and temperature changes. Quarry explosions do add to noise input as do whistles, bells, warning signals, quarry loaders, trucks, conveyors, crushers, etc.

The "no build" alternate that was presented June 12, 2003, has some advantages; but no definitions as to routes, type roads or other logistics was presented for study and judgements. The previously used "Old Medina Lake" rail line has some merit with fewer impacts than other SGR proposals.

Floods have caused a greater loss of life and property which devastated more communities in this country than any other natural hazard. Any railroad berms, trestles, quarry stockpiles and quarry trash intensifies flooding results. Trestles often collect trash and act as dams. The elevated rail bed also can act as a dam. Flood zone maps should have mapped areas with full understanding. The "no build" alternate appears to be the least objectionable to the wetlands.

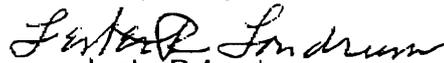
The Quihi-New Fountain Historical Society was formed to help identify historical buildings and sites. This group has volunteered help to study the local indian artifacts and sites of the Quihi Lake area. The "Medina Lake" rail line may effect these cultural resources the least.

Although tax revenues, jobs, and economics are paramount for this project, the information offered is too sketchy to form comments. Will any rail-quarry equipment be owned or leased? Will any rail-quarry operations be sub-contracted? How is the rail rendered for taxes? How is the quarry rendered for taxes? A base line "no quarry-no railroad" needs to be established to compare; then summarize all the proposed routes, equipments, impacts, and moneys.

I hope my comments on information requested at the June 12, 2003, Public Open House will be revisited and weighed. Full public hearings and complete widely publicized information is needed. Our pending problems and rights will not be properly addressed on this project unless this is done. Please supply additional design information as it is available. We are grateful for governmental agencies and their representatives with stamina, strength, knowledge, and foresight to spearhead our concerns and our rights.

cc: The Honorable Henry Bonilla
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Respectfully,


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