



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

April 7, 2017

Thomas A. Eye
Director, Plans and Programs
45 SW/XP
1201 Edward H. White II Street
Patrick AFB, FL 32925-3238

Re: Docket No. FD 35852, Canaveral Port Authority — Construction and Operation Exemption — Rail Line Extension to Port Canaveral, Florida; Request for Your Review of Applicant's Feasibility Study of a Potential CCAFS Rail Alternative

Dear Mr. Eye:

The Board's Office of Environmental Analysis (OEA) requests your review of the attached feasibility study of a potential rail route through the Cape Canaveral Air Force Station (CCAFS). The feasibility study was completed by TranSystems on behalf of the Canaveral Port Authority (CPA). OEA requests that you review and address the issues, topics and resources relevant to your jurisdiction or expertise, as well as any observations the 45th Space Wing (45 SW) may have about the overall feasibility of this potential rail route. Your responses will assist OEA in formulating recommendations on which alternatives should be carried forward for detailed evaluation in the environmental impact statement (EIS) for this proposed rail line.

Background

CPA plans to file a request with the Board for authority to construct and operate a new rail line to Port Canaveral (Port) in Brevard County, Florida. As initially proposed by CPA, the new rail line would extend approximately 11 miles beginning at the Port, include a crossing of the Banana River, and travel north through Merritt Island until it connects with approximately 17 miles of existing rail line at the National Aeronautics and Space Administration's (NASA) John F. Kennedy Space Center (KSC). The existing KSC rail line connects with a main line of the Florida East Coast Railway (FEC) north of Titusville at the west end of the Jay-Jay Bridge. The proposed rail line would provide the Port with direct freight rail service.

OEA initiated the EIS process for the proposed rail line with issuance of a Notice of Intent (NOI) to prepare an EIS and a Draft Scope of Study for the EIS on October 27, 2014. The NOI encouraged interested parties to comment not only on the potential impacts of the

proposed rail line, but also to identify potential alternatives to the Banana River - Merritt Island rail line route proposed by CPA.

Post Scoping Activities - Consideration of Potential Build Alternatives

After the scoping comment period ended on December 19, 2014, OEA began reviewing and evaluating the scoping comments. On the topic of potential build alternatives, commenters encouraged the consideration of potential rail alternatives that would either (1) exit the Port to the west, parallel State Route 528 and connect with the FEC main line just west of U.S. Route 1 and north of Cocoa; or (2) exit the Port from the east, extend north through CCAFS (generally parallel to Phillips Parkway), turn west to cross the Banana River to KSC via NASA Parkway East, and finally connect with KSC's existing rail line. Commenters also suggested localized variations of the Banana River – Merritt Island route originally proposed by CPA.

To assist in OEA's evaluations of all these potential alternatives, OEA formally requested additional information from CPA on three separate occasions. OEA submitted Information Request #2 to CPA on February 5, 2015¹ (*Click to follow hyperlinks to documents in the footnotes below*), and CPA responded to this request on March 26, 2015,² May 22, 2015,³ and July 14, 2015.⁴ (Note: Information Request #1 from October 2014 pertains to preliminary project information required by OEA to prepare the NOI). OEA submitted Information Request #3 to CPA on June 9, 2015⁵ and CPA responded on June 22, 2015.⁶ Finally, OEA submitted Information Request #4 on February 12, 2016⁷ to which CPA requested an extension and has not yet replied.⁸ Consequently, OEA has been unable to complete its assessment of the Banana River – Merritt Island or State Route 528 alternatives to determine which should be carried forward for detailed evaluation in the Draft EIS.

Dave Navecky, of my, staff also traveled to CCAFS in July 2015, met with you and other 45 SW personnel to discuss a potential CCAFS alternative, and received a tour of the CCAFS grounds encompassing the corridor of a potential rail alternative. Following this site visit, OEA sent a letter dated August 10, 2015⁹ to the 45 SW requesting written confirmation of the information conveyed during our July 2015 meeting and site visit as well as additional information OEA needed to complete a feasibility evaluation of the potential CCAFS alternative. The 45 SW's written reply was received on October 6, 2015.¹⁰

¹ [February 5, 2015 Information Request #2 from OEA to CPA.](#)

² [March 26, 2015 Information Request #2 Reply from CPA to OEA.](#)

³ May 22, 2015 Information Request #2 Reply from CPA to OEA [here](#) and [here](#).

⁴ [July 14, 2015 Information Request #2 Reply from CPA to OEA.](#)

⁵ [June 9, 2015 Information Request #3 from OEA to CPA.](#)

⁶ [June 22, 2015 Information Request #3 Reply from CPA to OEA.](#)

⁷ [February 12, 2016 Information Request #4 from OEA to CPA.](#)

⁸ [April 14, 2016 Request from CPA for Extension to Respond to OEA's Information Request #4.](#)

⁹ [August 10, 2015 Letter from OEA to 45 SW.](#)

¹⁰ [October 6, 2015 Reply from 45 SW to OEA.](#)

Additional Study of a Potential CCAFS Alternative

In an October 29, 2015 letter from CPA to OEA, CPA requested that OEA suspend its environmental review while CPA gathered additional information and further evaluated the feasibility of a potential CCAFS rail alternative.¹¹ In a November 9, 2015 reply, OEA agreed to the suspension.¹² However, based on OEA's July 2015 site visit and the 45 SW's October 6, 2015 written reply, OEA noted in its reply that there are numerous and substantial constraints associated with siting, constructing and operating a common carrier rail line through CCAFS. Collectively, these constraints suggest that it is not reasonable or feasible to site, construct or operate a common carrier rail line through CCAFS, and that a potential CCAFS alternative should not be studied in the Draft EIS.

OEA's November 9, 2015 letter granting the suspension also stated that if, after completing its feasibility study, CPA believes that a potential rail line through CCAFS remains potentially reasonable and feasible, CPA should provide OEA with specific details on where and how a common carrier rail line through CCAFS could be successfully sited, constructed and operated. These details should include a preliminarily engineered route through the CCAFS that addresses siting constraints and should provide a thorough explanation of how the potential common carrier rail line could successfully operate under, or mitigate for, the extensive number and specific types of mission critical or no dig days that would occur annually (i.e., days on which trains could not operate through CCAFS).

OEA received CPA's feasibility study of a potential CCAFS rail alternative on January 17, 2017.¹³ In its letter transmitting the feasibility study, CPA concluded that "the CCAFS has enough feasibility to be included in the environmental impact statement process." Through its transmittal letter, CPA also requested that OEA reinstate the EIS process with the CCAFS alternative identified as CPA's preferred alternative.

Additionally, CPA's January 17, 2017 transmittal letter requested that all other routes be removed from consideration and only the CCAFS route be carried forward for detailed analysis in the Draft EIS. However, as noted earlier, CPA has yet to respond to Information Request #4; and therefore, OEA is unable to conclude if any of the Banana River-Merritt Island or State Route 528 alternatives should be discarded or whether they should be carried forward for detailed analysis in the Draft EIS. Once OEA receives CPA's response to Information Request #4 and has evaluated the information therein, OEA will provide recommendations to the five federal cooperating agencies on these potential EIS alternatives.

Request for 45th Space Wing Input on a Potential CCAFS Rail Alternative

Today, OEA is requesting that the 45 SW review CPA's feasibility study of a potential rail alternative through CCAFS. As noted earlier, OEA is particularly interested in comments on issues, topics and resources relevant to potential rail line through CCAFS and its potential

¹¹ [October 29, 2015 letter from CPA to OEA.](#)

¹² [November 6, 2015 letter from OEA to CPA.](#)

¹³ [CPA's Feasibility Study of a CCAFS Alternative.](#)

impacts on 45 SW missions at CCAFS. Examples of general and specific topics that OEA would like you to consider addressing in your comments are:

- Overall feasibility of constructing and operating the proposed rail line through CCAFS;
- Potential project-related impacts to CCAFS operations and missions.
- Feasibility of the CPA-proposed rail route and associated design considerations (e.g., placement of the rail line in the Phillips Parkway median; placement and number of at-grade crossings, and relocation of a portion of Phillips Parkway, as depicted in the KMZ file noted below).
- Potential project-related impacts not addressed or adequately addressed in the feasibility study.
- The feasibility study estimates that 50 launches occur per year at CCAFS. Is this a reasonable estimate? Does the 45 SW have an estimate of the number of launches expected for 2017? Does the 45 SW have projections for the number of launch days per year for the period from 2018 through 2022 (e.g., a 5-year planning period beyond the current year)?
- Accuracy and reasonableness of assumptions and calculations used in the feasibility study, particularly those related to “mission critical” or “no-dig” days on which rail operations would be prohibited. For example, the feasibility study concludes that “. . . the number of red days during which rail operations are actually prohibited should not exceed 70 days.” Does the 45 SW concur with the study conclusion that caps no-dig days per year at 70 (see Feasibility Study, p. 9, para. 2)? If not, what would the 45 SW consider a more accurate estimate for the number of no-dig days per year based on 2017 circumstances?
- Type and nature of any additional studies that the 45 SW believes would need to be completed before the 45 SW could evaluate potential project-related impacts or the adequacy of the CPA-proposed mitigation in the feasibility study (e.g., building or activity-specific noise and vibration studies, and the suitability of the CPA-proposed railcar inspection portal with integrated x-ray cargo scanner to mitigate security concerns).
- Does the 45 SW concur with a statement in the feasibility study that “an amendment to the existing QD Arc waivers [for proposed freight train operations] is highly probable” (see Feasibility Study, p. 9, para. 4)? If not, can or how would the 45 SW characterize the likelihood of an amendment being granted to the existing QD Arc waivers for proposed freight train operations?

OEA is also providing a CPA-supplied KMZ file, which can be accessed through Google Earth, of CPA’s proposed CCAFS alternative. As proposed by CPA, please note that the yellow line represents the potential centerline of the proposed rail line, the turquoise lines represent the extent of a proposed 100-foot right-of-way (i.e., 50 feet either side of the centerline), the red line

represents a potential new emergency access road, and the lime green line represents the potential relocation of a portion of Phillips Parkway.

OEA looks forward to receiving the 45 SW's comments on CPA's feasibility study. We request that you provide any comments on the potential CCAFS rail alternative by May 12, 2017. Please send your response to Dave Navecky at 395 E Street, SW, Washington, DC, 20423, 202-245-0294 (David.Navecky@stb.gov). Please feel free to contact Dave if you have any questions. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Rutson". The signature is fluid and cursive, with a large initial "V" and "R".

Victoria Rutson
Director
Office of Environmental Analysis

Attachments: 1. CPA's Feasibility Study of a Potential CCAFS Rail Alignment
2. KMZ File for Use with Google Earth