



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

August 10, 2015

Thomas A. Eye
Director, Plans and Programs
U.S. Air Force
45 SW/XP
1201 Edward H. White II Street
Patrick AFB, FL, 32925

Re: Docket No. FD 35852, Canaveral Port Authority — Rail Line Extension to Port
Canaveral, Florida — Data Request Letter

Dear Mr. Eye:

Thank you for hosting the Surface Transportation Board's Office of Environmental Analysis (OEA), to discuss the Environmental Impact Statement (EIS) in connection with the above-referenced proceeding and for providing my staff and our third-party contractor (ICF International) with a site tour on July 16, 2015.

As you know, OEA is in the process of determining a range of reasonable alternatives for study in the EIS. As outlined in OEA's letter to you dated February 20, 2015, a number of commenters during the EIS scoping phase proposed rail alignments that would traverse the Cape Canaveral Air Force Station (CCAFS), an installation of the U.S. Air Force Space Command's 45th Space Wing (45th Space Wing). In your letter to OEA received March 19, 2015, it was noted that the 45th Space Wing did not consider the potential CCAFS rail alignments identified as 1a and 1b to be feasible, and that additional information would be needed to assess the feasibility of rail alignment 1c (see attachment, "Proposed CCAFS and SR-528 Rail Alignments").

OEA believes that alignments 1a and 1b are unlikely to be feasible. However, the information requested in the following list will assist OEA in determining whether to carry rail alignment 1c forward for detailed analysis in the EIS process. As such, OEA respectfully requests the information listed below.

1. In a response to OEA's request for information about the potential feasibility of a rail alignment through CCAFS, the Canaveral Port Authority (CPA) responded on March 26, 2015 (see attachment, "CPA's March 26, 2015 Response"), and identified "critical days" and their associated limits as a principal reason a rail alignment through CCAFS would not be operationally feasible. In a supplemental response to the Board dated July 14, 2015 (see attachment, "CPA's July 14, 2015 Response"), CPA provided additional documentation about critical days and no-dig days. The Board requests that the 45th Space Wing provide the following information pertaining to critical days, no-dig days, or other similar types of CCAFS closures or restrictions, to better understand the possible restrictions that could be placed on rail line construction and operation. For critical days, no-dig days, and other types

of closures or restrictions (including but not limited to launch preparations, Force Protection measures, and Trident Turning Basin activities) please:

- a. Provide the CCAFS bulletin on critical day designations.
 - b. Define the types of recurring closures that could preclude rail line construction or operation.
 - c. Describe the nature of the restrictions or limitations that could be placed on freight rail movements on CCAFS property during critical days, no-dig days, and other types of closures or restrictions.
 - d. Specify the duration of critical days, no-dig days, and other types of recurring closures or restrictions in hours. If these durations vary, what is the range of duration? What is the approximate average duration?
 - e. From 2005 to 2014, indicate the annual number of historical critical days, no-dig days, and other types of recurring closures or restrictions.
 - f. If CPA or its designated rail operators were operating a rail line through CCAFS, specify how notification of critical days or other restrictions could be conveyed.
 - g. Provide a projection of future critical day designations and other closures. If there are specific projections for future years, please provide these.
2. The 45th Space Wing letter to OEA dated December 9, 2014 addressed potential considerations associated with an Option A rail alignment and two facilities located on KSC property.

- a. Radar 19.14 (see attachment “PCRE Opt A B Radar 19.14”). The 45th Space Wing letter states, *“The 45th Space Wing’s Radar 19.14 is located south of the rail route shown as Option A. The Option A route would likely disrupt line-of-sight to future launch support locations. As such we consider the Option A route to be unacceptable unless it is determined there will not be any line-of-sight issues in the design process of the Option A route.”*

OEA notes that the constructed elevation of a trestle for any rail crossing of the Banana River would be approximately 18 feet above sea level, and that the maximum height of a rail car moving double-stacked cargo containers would be approximately 20 feet. Therefore, the maximum elevation of a train crossing the Banana River would be approximately 38 feet above sea level. To assist OEA in determining whether there could be potential line-of-sight obstructions posed by a train moving across the Banana River, please specify:

- i. The elevation above sea level of the radar antenna at the 45th Space Wing’s Radar 19.14 facility; and
 - ii. The range of angles (relative to the horizon) and absolute bearing that the Radar 19.14 facility needs to be unobstructed to support launch operations.
- b. ISTEF (see attachment, “Proposed Eastern KSC Rail Alignments”). The 45th Space Wing letter states *“Also, it appears that the proposed rail route will encroach on the northern 30% of the existing 1 km laser range at the Innovative Science Technology*

Experimentation Facility (ISTEF) located at KSC to the north of the Radar 19.14. Any rail route through that area must consider the need to resolve potential operational conflicts between the laser range and rail operations.”

- i. Although the ISTEF is operated by the University of Central Florida (UCF), based on your understanding of the facility, please describe any potential ISTEF operational concerns that would be associated with an operating rail line.
 - ii. The ISTEF location is in proximity to potential rail alignments other than Option A. Is the 45th Space Wing aware of other factors that OEA should consider in determining whether these alignments should be examined in further detail in the EIS?
3. Please indicate if there is an avoidance zone around the following 45th Space Wing facilities located on KSC. If there is an avoidance zone, please provide the radius of the avoidance zone, and please explain if rail construction and/or operation could be precluded in the avoidance zone.

45th Space Wing Facility on KSC	Avoidance Zone? (Yes/No)	Avoidance Zone Radius	Could rail construction and/or operation be precluded within Avoidance Zone?
Range Safety Radar 19.14			
Multiple Object Tracking Radar (MOTR)			
Tel-IV Telemetry Site			
ISTEF (operated by UCF)			

4. What are the potential processes for enabling the construction and operation of a freight rail line through CCAFS (i.e., processes for conveying a rail line right-of-way for use by CPA)? If an Enhanced Use Lease process would be an option, provide a summary of what the process entails.
5. The National Oceanic and Atmospheric Administration nautical charts indicate that a portion of the Banana River west of CCAFS is a “restricted zone” (see attachment “Banana River Restricted Zone Map”). The regulations at 33 C.F.R. § 334.560 indicate that this restricted

area will be closed when it is deemed necessary by the Commander, 45th Space Wing or his/her designee to address any perceived threat to the local area and that such closures may occur with little advance notice (see enclosure for map depicting the Banana River restricted zone). OEA requests the 45th Space Wing provide the following information pertaining to the restricted zone to better understand the possible restrictions placed on rail construction and operations in this area.

- a. Since the beginning of 2010, how many times has the 45th Space Wing ordered the closure of the Banana River restricted zone?
 - b. Typically, how much advance notice has been provided for these closures?
6. Based on our July 16, 2015 meeting and site visit, OEA understand that the following items present considerations for the potential construction and operation of a rail line on CCAFS. Does the 45th Space Wing confirm this summary?

Environmental

- a. Alignment 1c would cross several large ponds located south-southwest of NASA Parkway East. These ponds assist in managing a groundwater plume from the Industrial Area. The ponds also serve a storm water management function and enable CCAFS to meet state water quality standards (i.e., Total Maximum Daily Load or TMDL requirements).
- b. Alignment 1c would also traverse five solid waste management units that include groundwater and soil contamination areas and a closed landfill site.
- c. Several historic cemeteries and Native American burial sites are located within the Samuel C. Phillips Parkway (Phillips Parkway) corridor. The sites include the remains of numerous Native American individuals that were recently repatriated to CCAFS grounds.
- d. CCAFS is a National Historic Landmark district with many structures listed on or eligible for listing on the National Register of Historic Places.
- e. Scrub jay habitat exists along Phillips Parkway, and if disturbed, mitigation would be required.
- f. Endangered beach mice present on CCAFS could be adversely affected by a proposed rail line.
- g. CCAFS is home to approximately 2000 sea turtle nests per year. An approved light mitigation plan could be required for any potential rail line construction and operation.
- h. There are 800 acres of wetlands on CCAFS; any impact would likely require mitigation.
- i. Sea-level rise is a long-term consideration for future development at CCAFS, particularly for any non-mission construction such as the rail line; the average elevation at CCAFS is just six feet above sea level.
- j. The 45th Space Wing is identifying sites around Phillips Parkway for TMDL contaminant treatment.
- k. CCAFS has a large population of gopher tortoises, whose movement could be restricted by the placement of a rail line near the Phillips Parkway corridor.

Security

- l. Personnel constructing, operating, and maintaining the rail line would all be required to go through a background check and receive authorization to be on-site. Currently all commercial and contractor vehicles are checked before entering CCAFS, and a similar procedure would need to be developed for rail traffic.
- m. Security would need to consider the potential risks associated with trains moving through CCAFS.
- n. Force Protection Level designations exist on CCAFS and dictate the need for different levels of screening personnel or cargo.
- o. Coordination and communication would be required for closures of various areas, from CCAFS to NASA Parkway East, due to launches and other activities, such as scenario exercises (see also Question #1).

Safety

- p. Explosive Quantity Distance (EQD) arcs
 - i. EQD arcs are driven by the requirements of the Department of Defense Explosive Safety Board (DDESB) – The DDESB’s requirements will apply to the construction and operation of a new rail line on CCAFS.
 - ii. Most EQD arcs are in effect 100% of the time.
 - iii. EQD arcs extend into the Phillips Parkway corridor and potential alignment 1c for multiple facilities.
 - iv. The Trident Turning Basin hosts naval submarine activities, which would likely prevent rail construction or operations when safety arc restrictions or closures are imposed.
- q. Potential hazards to rail construction and operation activities would be present because of the hazardous materials handled on CCAFS.

General and Operational

- a. Vibration impacts would need to be studied and addressed for mission essential facilities, equipment and operations, such as satellite and payload processing facilities, range operations facilities, and munitions storage sites. Vibration criteria would vary from building to building depending upon building-specific activities, equipment in use, distance from the rail line to the building, soil/geologic conditions and other factors.
- b. Utilities between CCAFS and NASA KSC run along Phillips Parkway and NASA Parkway East (water main; high pressure helium and nitrogen gas lines; communication lines; electric; sewer; and natural gas). Vibration (see a. above), as well as route location and rail construction impacts would need to be studied and addressed.
- c. The industrial area contains numerous communication lines and communication buildings.
- d. Trains would need to pre-coordinate any radio frequency (RF) transmitter equipment before entering the base; certain CCAFS operations require RF silence.
- e. Due to the density of facilities and other security and safety considerations, there would be insufficient space for an unrestricted rail line right-of-way that would avoid mission essential facilities.

- f. The presence of a rail line could have long-term impacts on future 45th Space Wing development.
- g. Train operation impacts including vibration would need to be taken into consideration on various mission essential facilities.
- h. A rail line through CCAFS would increase the 45th Space Wing's security manpower requirements because of rail-related safety and security implications.
- i. There could be safety, security, and operations impacts if a train were to stop and obstruct the Philips Parkway near the southern end of CCAFS.

We look forward to receiving this information at your earliest convenience and if possible, no later than September 18, 2015. If it would be helpful to speak to someone about the questions that we are posing in this letter, please do not hesitate to contact Mr. Dave Navecky of my staff at 395 E Street, SW, Washington, DC, 20423, 202-245-0294 (e-mail address: David.Navecky@stb.dot.gov). When your response is ready, please send it to Mr. Navecky by email. Thank you very much for your assistance.

Sincerely,



Victoria Rutson
Director

Attachments:

- Proposed CCAFS and SR-528 Rail Alignments
- CPA's March 26, 2015 Response
- CPA's July 14, 2015 Response
- PCRE Opt A B Radar 19.14
- Proposed Tel-IV Road Rail Alignments & Barge Options
- Proposed Eastern KSC Alignments
- Banana River Restricted Zone Map