

E0 - 2471



FD 35852: Draft Work Plan

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Kathryn -

Pursuant to Section VI.A of the Memorandum of Understanding (MOU) among the Board, Canaveral Port Authority (CPA), and ICF for the subject case, please find attached the draft Work Plan for preparation of the environmental impact statement. The Work Plan was initially prepared by ICF and submitted to OEA for review and comment. As specified in the MOU, ICF submitted the draft Work Plan to OEA within 30 days after the MOU was executed.

The attached draft reflects OEA's input to the document. OEA will finalize the Work Plan upon receipt and consideration of any comments by CPA.

Please let me know if you have any questions.

Thanks,

Dave

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**Work Plan for the Environmental Impact Statement
on the Proposed Port Canaveral Rail Extension
January 2015**

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SECTION 1

Introduction

1.1 Purpose of Work Plan

As required by the Memorandum of Understanding (MOU) among the Surface Transportation Board (Board), Canaveral Port Authority (CPA) (the Applicant), and ICF International (ICF), ICF must prepare a Work Plan in consultation with the Board's Office of Environmental Analysis (OEA) and the Applicant. The Work Plan addresses the requirements of the MOU by describing the work to be performed, the projected schedule for completing the various tasks, identification of staff members to perform the environmental review, and an outline of the environmental analysis. This document is organized into two sections. Section 1 contains the Purpose of the Work Plan, a Description of the Proposed Action, the Approach to the Environmental Review, Approach to the Project, and the Schedule and Organization Chart. Section 2 encompasses the tasks that comprise the Work Plan.

1.2 Description of Proposed Action

The CPA plans to file a request with the Board, pursuant to 49 U.S.C. § 10502, for authority to construct and operate approximately 11 miles of new rail line to Port Canaveral (Port) in Brevard County, Florida. The proposed Port Canaveral Rail Extension (PCRE) would also utilize 17 miles of existing rail line at the National Aeronautics and Space Administration's (NASA) John F. Kennedy Space Center (KSC) to make a connection with a main line of the Florida East Coast Railway (FEC). The proposed PCRE would provide the Port with direct access to freight rail service. As proposed by CPA, the new rail line would begin near the Port's North Cargo Area, extend west across the Banana River, enter KSC on Merritt Island south of Kars Park, and then turn north through KSC grounds where it would connect with KSC's existing rail line.

1.3 Approach to Environmental Review

OEA, with the assistance of its third-party contractor ICF, will prepare a Draft EIS for agency and public review followed by a Final EIS. OEA will have the ultimate responsibility for the EIS. OEA's primary responsibility in this environmental review is to ensure compliance with the requirements of the National Environmental Policy Act (NEPA), the Board's environmental rules, and other applicable environmental statutes and regulations by preparing appropriate environmental documentation. OEA will direct ICF in the preparation of the environmental documentation. ICF's scope of work, approach,

and activities shall be under the sole supervision, direction, and control of OEA. The Applicant's primary responsibilities include retaining ICF as a third-party contractor to assist OEA in preparing all required environmental documentation and performing project administrative services. The Applicant is also responsible for providing OEA and ICF with the appropriate project information and analysis necessary to prepare the environmental documentation. ICF's primary responsibility is to assist OEA in the environmental review process, including preparing appropriate environmental documentation, providing technical guidance on the environmental analysis, and related activities. Should any policy issues arise during the environmental review process, ICF will consult OEA for direction or clarification.

1.4 Project Approach

The project is comprised of six main tasks:

- Project Management
- Agency and Tribal Consultation
- Public Involvement
- Environmental Data Collection and Analysis
- Document Production
- Data Issue/Management

Each of these tasks is described in Section 2.

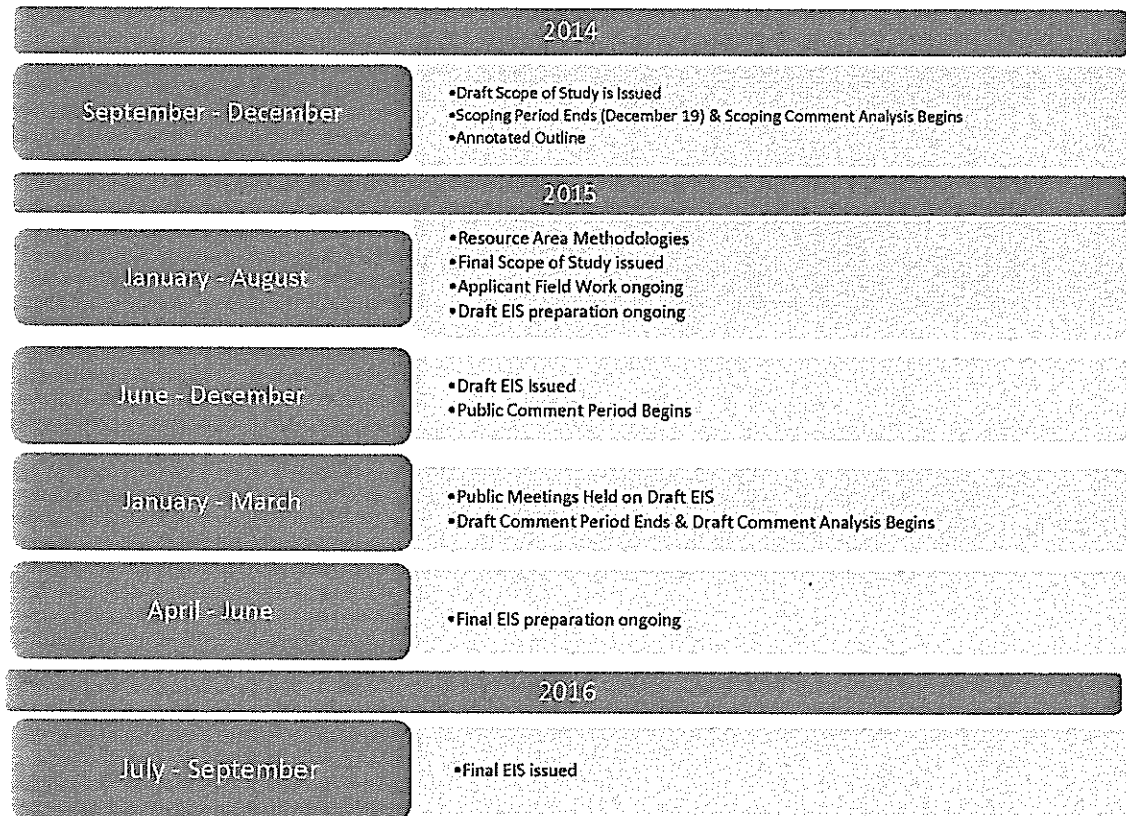
1.5 Preliminary Schedule and Organization Chart

The preliminary schedule and project organization chart are shown on the following pages. The preliminary schedule is subject to revision at OEA's discretion and the issues and challenges encountered during the EIS process. The schedule uncertainties include but are not limited to: (1) the ability of five cooperating agencies to provide timely reviews of EIS components; (2) complexities of environmental issues identified; (3) scope and timing of field work and field studies; and (4) scope of comments on the Draft EIS particularly those suggesting the need to perform additional data analyses or field studies.

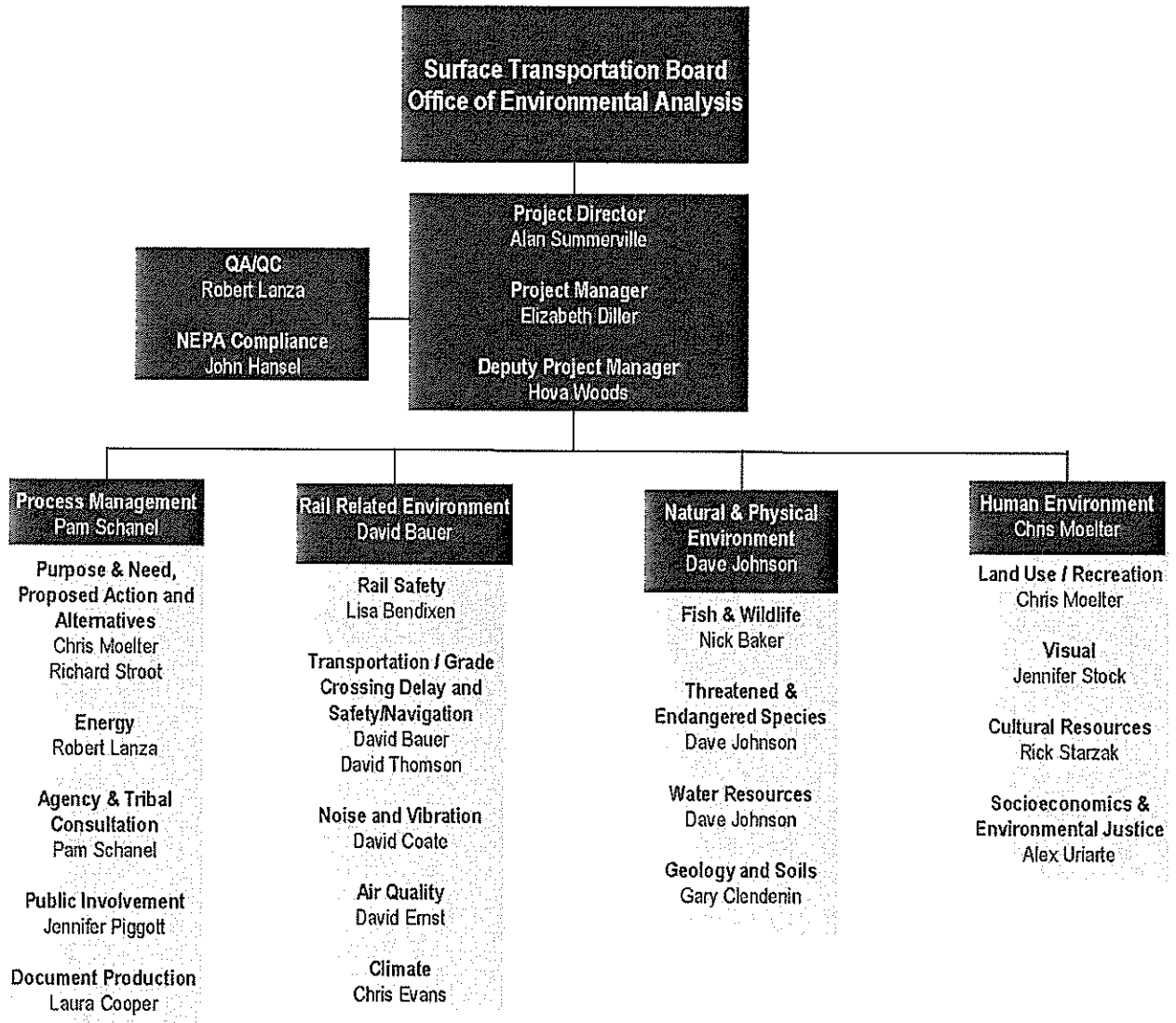
PCRE EIS Preliminary Schedule

This preliminary schedule reflects the NEPA process from issuing the NOI and draft scope of study

(October 27, 2014) to the publication of the Final EIS in 2016.



Organization Chart



SECTION 2

Task Plans

Task 1: Project Management

Approach

The Task Plan for Project Management is designed to maintain effective management and coordination of project activities, schedule, and cost. The activities below describe the management approach for coordinating the environmental review process directed by OEA and implemented by ICF.

Activities

The Project Management task is organized into three activities:

- Prepare Work Plan
- Maintain Project Coordination & Communication
- Maintain Project Controls, Schedule, and Budget

Prepare Work Plan

ICF prepared this Work Plan with six major tasks to support the efficient organization and management of project activities. The Work Plan describes each of these six tasks, including the approach, activities, and key resources for completing the task.

Maintain Project Coordination and Communication

Project coordination and communication provides support and processes required to ensure timely, efficient, and appropriate assignment, follow-through, and closure of project tasks and activities. This provides for critical coordination and communication links among OEA, the third-party contractor, and the Applicant for effective and efficient work performance.

- Establish and maintain project communication/information dissemination
- Coordinate regular conference calls and meetings
- Maintain Action Item tracking

Maintain Project Controls, Schedule, and Budget

This task involves the application of project management knowledge, skills, tools, and techniques to project activities to ensure efficient project team performance. ICF utilizes a systematic approach to ensure timely and cost-effective completion of the required environmental review activities. Because the project schedule is important to OEA and the Applicant, ICF's project management approach begins with detailed and efficient project scheduling. The schedule and resource assignments provide the framework to address the project scope, cost, and quality while adhering to OEA's environmental review schedule. ICF evaluated each task and assembled estimates of the level of effort to complete each task. ICF established a cost/schedule control system that will provide standardized cost and schedule performance reporting.

- Project schedule development and status reporting
- Manage tasks and sub-consultants
- Monthly progress report and invoice

Key Resources

ICF: Elizabeth Diller and Hova Woods, with guidance from Alan Summerville

Task 2: Agency and Tribal Consultation

Approach

The approach to the agency and tribal consultation task is to engage the relevant agencies in early and proactive consultation. In doing so, OEA and ICF hope to gain their input and reach consensus on the methodologies covering subjects where those agencies have regulatory jurisdiction or other review authority.

Activities

This task involves activities related to consulting with tribal governments, cooperating agencies, and other agencies on issues related to the proposed action. ICF will work with OEA to identify agencies having regulatory jurisdiction, other review authority, or relevant information, and schedule meetings or establish contacts as appropriate. These consultation efforts will be reflected back through the

methodologies and analyses as appropriate and will be documented in the Draft EIS. These activities include meetings with the agencies to present information on the proposed action and meetings with the agencies to discuss regulatory issues.

Key Resources

ICF: Elizabeth Diller, Hova Woods, Pam Schanel, Dave Johnson, Rick Starzak, Chris Moelter, and the subject matter expert staff shown on organization chart

Task 3: Public Involvement

Approach

This task describes implementation of the public involvement component of the EIS process. The task includes public involvement activities geared toward providing the public with proper outreach, notification and information, tracking and monitoring community and media issues and concerns, identifying areas of special concern, and facilitating public comment. These activities include developing notification lists, arranging and running public meetings, monitoring media coverage, and developing public notification and information materials.

The Public Involvement task will use the following communications procedures for working with OEA, team members and the public:

- Public involvement activities will be directed by OEA and implemented by ICF.
- Public involvement materials will be presented to OEA for review and approval.
- Communication with the public, affected communities, and government agencies will be directed through OEA and handled with sensitivity.
- Project team communication with the media concerning the project is prohibited. All media inquiries will be referred to OEA.
- The team will document verbal decisions, meetings, and activities to ensure clarity and follow-up.

Activities

The primary purpose in conducting public involvement during OEA's environmental review is to inform

the public about the opportunity to comment, the availability of documents for review, and the potential environmental effects. ICF will monitor relevant media coverage and provide the team with reports of important media information as needed. ICF will:

- Work with OEA on the Notice of Intent and Draft Scope of Study;
- Work with OEA on the Final Scope of Study;
- Develop project mailing lists;
- Prepare notification materials;
- Establish and maintain project web site;
- Arrange for and support public meetings; and
- Monitor media coverage and summarize key issues.

Key Resources

ICF: Elizabeth Diller, Hova Woods, Pam Schanel, and Jennifer Piggott

Task 4: Environmental Data Collection and Analysis

Approach

The Environmental Data Collection and Analysis task covers the review of all information provided by the Applicant, preparation of the purpose and need, development of a range of alternatives, and the environmental analyses.

Activities

ICF has delineated the work in this task into the activities indicated below.

- Review information submitted by the Applicant.
- Preparation of Chapters for Purpose and Need, and Proposed Action and Alternatives.
- For each resource area identified in the Final Scope of Study - preparation of Environmental Analysis Methodologies, Affected Environment, Environmental Consequences, Technical Appendices, Mitigation, and other sections of the EIS.
- Preparation of Responses to Substantive Comments on the Draft EIS.

Review Information Received from Applicant

The accuracy of the information contained in the filings before the Board and responses to OEA information requests is important for preparing the Draft EIS. The project description, construction information, and proposed railroad operations information feeds into the technical analyses in the Draft EIS.

ICF will identify critical rail operations data necessary for each environmental analysis topic area. An early understanding of the project description, alternative alignments, and operational assumptions will be important for the environmental review. ICF will brief OEA on the results of the review and if necessary, bring issues to their attention for resolution. The review of the Applicant submitted information includes the following:

- Review Applicant's preferred alignment and any other alignments; and
- Review construction information and rail operations information relevant to environmental analyses.

Preparation of Chapters for Purpose and Need, and Proposed Action and Alternatives

This task will include an analysis of the Applicant's filing and related information, upon which the development of the purpose and need chapter will be based. This chapter will be consistent with the information provided by the Applicant along with OEA's approach to this chapter as developed in previous OEA EISs.

Development of the proposed action and alternatives chapter will be based on an analysis of the Applicant's filing and related information. This chapter will be consistent with the information provided by the Applicant. This task also includes the analysis effort necessary to help OEA determine the alternatives to be analyzed concordant with OEA's approach to developing a reasonable range of alternatives. OEA will provide direction in developing the reasonable range of alternatives. ICF will conduct technical and quality control reviews of these parts of the EIS.

Preparation of Environmental Analysis Methodologies, Affected Environment, Environmental Consequences, Technical Appendices, and Mitigation

ICF, under OEA's direction, will develop methods for analysis of the various technical study areas. These

methodologies are based on the approach taken in prior OEA environmental reviews, agency consultation, public comments, and the issues specific to this proposed action. The methodologies address transportation systems, safety, land use, recreation, biological resources, water resources, navigation, geology and soils, air quality, noise and vibration, energy resources, socioeconomics, cultural and historic resources, aesthetics, and environmental justice. This also comprises the outline of environmental analysis. Developing a common understanding of terminology, levels of impact, and other aspects of various methodologies is vital to ensure that the technical analyses conducted for the environmental review are adequate. In preparing these components of the EIS, ICF will conduct technical and quality control reviews. ICF will raise any policy issues to OEA for direction or clarification. OEA will direct ICF in the development of the analysis methodologies.

Where data is necessary to support the analysis, but is overly voluminous or highly technical, it will be appended to the Draft EIS as a technical appendix. A number of technical appendices may be necessary for technical analyses that are important to document in support of information and analyses in the main body of the EIS. GIS activities will include creating and maintaining GIS data files, metadata, and conducting analyses in GIS.

Preparation of Responses to Substantive Public Comments

ICF, under OEA's direction, will develop responses to substantive comments received during the comment period on the Draft EIS. The response to public comments on the Draft EIS will inform the content of the Final EIS.

Key Resources

ICF: Elizabeth Diller, Hova Woods, Pam Schanel, David Bauer, Dave Johnson, Chris Moelter and resource area expert staff shown on organization chart

Task 5: Document Production

Approach

The Document Production task involves activities related to the production and publication of the Draft EIS and Final EIS. ICF has developed an iterative process to ensure completeness, technical accuracy, and clarity of the document. Initial stages of the document development will focus on the EIS outline,

purpose and need, and proposed action and alternatives. After technical, quality control, and editorial review by ICF, OEA will review these parts of the Draft EIS so that they can become a foundation for the rest of the document. The focus turns to the methodologies, affected environment, impact analyses, mitigation and other sections of the Draft EIS. These activities will be completed and coordinated closely with OEA. When these activities are complete, the document production team will assemble the chapters for final technical, quality control, editorial review, and OEA review.

Activities

These activities include reviewing, editing, formatting, producing figures, managing EIS distribution, printing, and mailing. The document production team will prepare the document outline and the initial chapters for OEA review. ICF will provide the Draft Outline to OEA for review and approval. The intent of this activity is to provide clear direction and agreement on the document organization and reduce the editing and rewriting of the technical information.

ICF will prepare two preliminary drafts for OEA review. The second preliminary draft will be circulated to the cooperating agencies for review. Cooperating agencies will be provided with revised sections for review before the EIS is published, but not the entire revised document. ICF will use a continuous staggered approach for delivering chapters and appendices to OEA for review.

Key Resources

ICF: Elizabeth Diller, Hova Woods, and Laura Cooper

Task 6: Data Issue/Management

Approach

The data and issue management effort is the central activity for all project data and document information. This effort serves as the main repository of data files for use by the EIS team. This task provides the project support tools for managing data, information, communication, and document review for the project.

Activities

This task involves activities related to general information management and dissemination within the EIS

team. This includes activities such as managing project documents, tracking correspondence, and dissemination of data within the team. ICF will maintain information in electronic form, accessible to the project team through a secure internet site. The team will also use this site to document meetings, conference calls, and telephone contacts with OEA, the Applicant, agencies, and the public. The team will also use this site to post sections and chapters of the EIS for internal review and comment. This task involves processing the comments received during public review periods, such as Scoping and the comment period on the Draft EIS. Draft EIS comments will be processed using CommentWorks®, an ICF program, to manually process comments through a system of comment bracketing relevant text and assigning them to specific issue areas.

Key Resources

ICF: Elizabeth Diller, Hova Woods, and Gretchen Pinkham