

HE-1424
RS

Surface Transportation Board
Case Control Unit
Washington, DC 20423
Attn: Ms. Rini Ghosh, Project Manager

10 January 2005

Re: STB Docket No. FD 34284

Dear Ms. Ghosh:

My name is Lester Landrum. My wife and I have been Quihi residents for the past 14 years and live in the home we built at 776 CR 354 and it includes one Edwards well. Our home is about .6 mile east of the proposed rail and about 1.1 miles from the proposed quarry site. Our home is on registered heritage land that has been in the same family for 124 years.

In general, the EIS with three volumes was hard to read, illegible on many pages and some data was blacked out. The number of drafts was not adequate. Data varied widely without notations and comments. I question if this EIS is of a quality for public records and archives. It appears that this report was not complete, was hurried and underfunded. It was necessary to add 10 omitted pages after publication. Our appeal for additional time for study to make rational and inquiring comments was denied.

This EIS did not address the safety issue of the SGR and UP interface. The UP past and most recent history does not confirm that this railroad can handle added traffic safely. STB knows and has full knowledge of the Bexar-Medina County accidents over the last two years plus it has direct knowledge of UP operations during "Fall peak" operations by limiting rock carloading and train operation in this area. Note this topic was not included with this report. Any mitigation should be aided by STB Director, Office of Compliance and Enforcement, to reflect local UP operations. This mitigation could extend to the Houston destination area. It did not fully address the operation to existing network rail line.

Floods have caused a greater loss of life and property and have devastated more communities in the United States than any other natural hazard. Flash flooding is common in this area of Texas. Bridges, berms, piles of rubble and debris do alter flood water and can intensify flooding with damming actions. These latter damming actions often fail, and produce sudden added flood waters. Any mitigation should include the routine removal of debris from all railroad ditches, culverts, and bridges. This could be included with the often noted grass maintenance. This debris should include sand, gravel, rock, etc. If after some period of time a local flood control organization is necessary, then the railroad should contribute its shared part for flood corrections for the life of the railroad.

Quihi is a pristine rural area in and around the intersection of FM 2676, Quihi creek, and Quihi lake. This FM 2676 is the only major road from this area. This area and road will be inside the new proposed loop around the San Antonio area. This new loop is to incorporate state highway 173, just west of Quihi. With this new loop and a rapidly expanding population growth west from San Antonio, a grade-separation is required. Please note that no comments were included on this proposed new loop. Mitigation should revisit this omission with analysis.

How will SGR interface and move trains to and from the UP line? Will SGR move directly from the quarry to main line without pausing? What will be the average speed of the train entering or exiting the quarry at CR 353? What will be the estimated speed of the train entering/exiting the UP line? How much time is required for a loaded train to accelerate from rest to 20 mph? What will be the average speed of the train as it crosses CR 353 from the quarry? What will be the days and hours of the trains movements? Will UP "Fall peak" period effect the quarry movements? All these and other questions need to be addressed in mitigation to insure SGR's 3-4 minute delay at each crossing. This 3-4 minute period was quoted in several SGR letters. I could see no train idle time included in the noise studies, and it should be included in the mitigation.

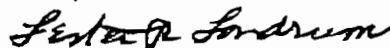
The quarry and railroad are connected to our environment by sun, air, water, land, and time. The quarry and railroad would be connected with ownership, products, money, management, profits, and equipment. Common carrier status, with eminent domain powers, would seal the connection of the rails and quarry. This whole and complete project should be studied as one. I see this study to also include the actions and reactions with the Union Pacific rail to include safety, traffic, and the environment of neighbors to the east. The EIS has included an analysis of the potential environment effect of the loading rack. It was not clear if this included the cars and the engines. Will the loading dust, drainage, and noise be included? Again, as environmental effects are cumulative, these items should be included in all noise, dust, and water environment reviews.

On the "Risk of Accidents", the SEA used national statistics to calculate the risk of accidents over the proposed railroad. TxDot statistics should also be considered as Texas was first in grade-crossing fatalities. With recent UP accidents over the last two years a more local statistic should be included for benchmarks. We all want the controlling statistics to help save lives.

The SEA's recommended mitigation for ground water did not follow Edwards Aquifer Authority's request of February 26, 2004. In this letter it requested an inventory of all wells within the SGR project area. "Locate all water wells in the project area and identify the aquifer in which they are completed." All wells within the project's site and right-of-way should be properly abandoned.

Vulcan's lack of concern, skew of data, incomplete data, and failure to address real everyday issues is apparent in most of Mr. David H. Coburn's letter to you. With the above premise all mitigation should be well understood, exact, with follow-up and enforcement for exact periods or junctures. All mitigations should have oversight by persons with no Vulcan ties. All mitigation progress should be well publicized.

Sincerely yours,



Lester R. Landrum
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cc: US Representative Henry Bonilla
US Senator John Cornyn
US Senator Kay Bailey Hutchison