



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

October 30, 2019

Kathryn Floyd, Esq.
Venable, LLP
600 Massachusetts Avenue, NW
Washington, District of Columbia 20001

Re: Docket No. FD 36284, Seven County Infrastructure Coalition—Construction & Operation Exemption—in Utah, Carbon, Duchesne, and Uintah Counties, Utah; Information Request #3

Dear Ms. Floyd:

Consistent with 40 C.F.R. § 1506.5(a), the Surface Transportation Board's Office of Environmental Analysis (OEA) requests the information listed below, which is necessary for the Environmental Impact Statement (EIS) that will be prepared for the above referenced proceeding. Please provide this information by **November 22, 2019** in order to avoid unnecessary delay in the environmental review process. Some of the requested items are a follow-up request to incomplete or inadequate responses provided by the Seven County Infrastructure Coalition (Coalition) as a response to Information Request #1. OEA is also requesting additional detail, as needed.

OEA is aware that, in some cases, requested information may not yet be available. In those cases, we request that the Coalition develop a likely scenario on which the environmental analysis can be based.

Please provide responses to the following requests.

Generally:

1. Please clarify "both routes" as used in responses. All responses should include information for all routes under consideration.
2. To inform OEA's analysis of potential socioeconomic and air quality impacts, please clarify "work season" as used in responses. The clarification should include the specific months that constitute a work season for each of the stated anticipated 2-year construction time frames.

Specifically:

3. From Information Request #1, Item #2
 - a. **OEA Request:** Description of temporary uses or disturbances outside of the proposed footprint (e.g., staging areas).
 - b. **Coalition Response:** There will be staging areas for tunnel and bridge construction. There will be laydown yards for construction equipment and storage of construction materials. Location of these will be near the tunnel portals and one or both sides of proposed bridge crossings [sic]. Where possible right-of-way will be purchased for bridge [sic] and tunnel sites. Staging of construction material and construction equipment locations will be determined with help of a contractor and will be in large and flat areas, ideally they would be in strategic spacing for multiple work fronts and on both ends of the project vicinity. Unable to determine exact temporary disturbance locations. Some easements outside of yet to be determined right-of-way may be needed. Item 6 contains KMZs that show anticipated bridge locations.
 - c. **OEA Follow-up Request:** Please provide a scenario against which analysis can be conducted. This could include estimated locations and estimated acres of areas outside of the ROW needed for the disturbances itemized in the Coalition response.
4. From Information Request #1, Item #9
 - a. **OEA Request: Railbed Construction:** Description of rock quarry and borrow locations/size, footprint, quantity of material extracted, etc., if relevant.
 - b. **Coalition Response:** The material may be local or shipped in on train to nearby location to the project. (Possibly [sic] from UT and/or CO) Exact quantities will be determined during the detail design phase.
 - c. **OEA Follow-up Request:** To inform OEA's analysis of potential impacts to local transportation patterns, please clarify if the intent is to use material from existing quarries or if a new source would have to be developed. If a new source would be developed, identify the anticipated location of the source.
5. From Information Request #1, Item #12
 - a. **OEA Request: Material Acquisition for Construction:**
 - If site-specific cut volumes are insufficient, where would the fill come from?
 - Where would sub-ballast material be obtained? What quarries are nearby?
 - Where would ballast material be obtained?

- Will water be required for dust suppression and soil compaction? If so, where would this water come from?
- b. **Coalition Response:** Balancing the Cut and Fill material is the goal for the design of the railroad. Ballast and subballast material may be local or shipped in on train to nearby location to the project. Water will be required for both suppression and soil compaction, and the water will likely be trucked in from approved locations. The material will be required to meet all specifications and if water is extracted it will have to be done following all rules and regulations.
 - c. **OEA Follow-up Request:** To inform OEA’s analysis of potential impacts to local transportation patterns, please indicate whether ballast and subballast material would be available from local quarries. To inform OEA’s analysis of potential impacts to water resources, please indicate whether the approved water locations are anticipated to be groundwater sources, surface water sources, or both. Please identify estimated water volumes needed, including per track mile.
6. From Information Request #1, Item #13
- a. **OEA Request:** Bridges, Culverts, and Other Surface Water Crossings: Description of location and types of bridges, culverts, or other undesignated drainage structures used to cross streams, rivers, or ditches. Would there be any in-water structures associated with bridges? If so, please describe in detail.
 - b. **Coalition Response:** Attached is the current preliminary list for both routes for bridges. Culverts have not been detailed at this time. All bridges and culverts will be designed to appropriate means for railroad loading.
 - c. **OEA Follow-up Request:** To inform OEA’s analysis of potential impacts to water resources, please provide a list of bridge crossings for the Whitmore Park route with an equivalent level of detail as included in the lists provided for the Indian Canyon and Wells Draw routes. Define the acronyms used in the “BR Type” column in all lists. Identify which bridges over water bodies are anticipated to be clear span (i.e., no structures placed below the ordinary high water mark) and which are anticipated to include structures in-water or below the ordinary high water mark. Provide example information on culverts, such as typical culvert type (i.e., round pipe, box, double barrel, pipe-arch), material (i.e., corrugated metal, concrete), and size range (i.e., diameter ranges). Please also provide hydraulic basis for culvert design, specifically the flow event that culverts and bridges would be designed to accommodate (e.g., 100-year flood).
7. From Information Request #1, Item #14
- a. **OEA Request:** Construction Schedule:
 - Description of construction schedule, for example:

- How many months would it take to construct and what is the overall time period? Consider weather restrictions in the project area.
 - b. **Coalition Response:** 24 month or less construction time is the current estimation taking on weather considerations.
 - c. **OEA Follow-up Request:** To inform OEA’s analysis of potential socioeconomic and air quality impacts, please clarify the anticipated months of the year during which construction would occur for each alternative.
8. From Information Request #1, Item #15
- a. **OEA Request:** Grade Crossings: Planned (including voluntary mitigation) safety protection at new at-grade crossings.
 - b. **Coalition Response:** See item 6 for both route features KMZ that shows locations of grade crossings. Grade crossings will be protected in accordance with all rules and requirements. Each crossing will be looked at and designed based on the established criteria for which type of protection will be used.
 - c. **OEA Follow-up Request:** Please provide a KMZ file with route features for the Whitmore Park Route. Please confirm that paved public roadway crossings would be equipped with active warning devices (bells, flashers, and gated) in addition to constant warning time devices. Please confirm that for gravel and unsurfaced public crossings and private crossings, passive warning devices consisting of stop signs and crossbucks would be used.
9. From Information Request #1, Item #20
- a. **OEA Request:** Proposed Rail Line Operation
 - Description of proposed operations, including:
 - Number of days per week and year that trains would operate.
 - Number of locomotives used to move the unit trains and horsepower.
 - Maximum and average length of trains.
 - Average operating speeds including speed at each new at-grade crossing.
 - Description of proposed maintenance.
 - Specific information on rail route and length (for operations, not just what would be built), intended track class, any additional speed restrictions beyond those for the track class (such as on steep inclines).

- Number of anticipated rail cars by commodity or group of like commodities.
- b. **Coalition Response:** Anticipated volumes range from 2 to 7 trains per day each way, dependent on market conditions and shipper acceptance of the railway. Maximum train length will vary and may be up to 10,000 feet long or 150 60' cars with locomotives and buffer cars. Railroad [sic] operations will be anticipated at all hours of the day and over the entire year. Locomotives per train will vary from 1 to 12 locomotives per train depending on length, load and operations. Types of cars are potentially the following: open and covered hopper, well cars, flat cars, plain and equipped box cars, any typical car carried by a north American railroad, open and covered gondola, refrigerator car, tank car train can are possibly be anticipated for this area. Operating maximum speed is 40 mph and average speed for a loaded train up the may roughly average between 10 to 20 MPH. Commodities will include energy fuels, bulk refined and unrefined commodities, manufactured goods, animal products and agriculture products, consumer goods, building materilas [sic], industrial materials, autos and trucks, machinery, other mobile machinery, chemicals, forest products, etc. Speed restrictions on curves and descending grades will be be [sic] based on typical north America railroad standards. The item 1 above includes KMZ for both routes for the lengths of track. Locomotive and their horsepower will be similar to north American fleet averages for tiers and types. Proposed maintenance may include activities on the tracks, such as surfacing the rail, cleaning the ballast, tamping the ballast, checking gauge, rail grinding, fixing rail pull aparts and rail kinks. Maintaing [sic] signals. Maintaing [sic] rail sensors and rail lubrication. Replacing rail, ties and ballast over time. Maintaing [sic] tunnels and regularly inspecting tunnels. Regular track inspection. Various other maintenance items needed to operate a railroad.
- c. **OEA Follow-up Request:** Please see STB Information Request #2, for follow up requests related to this response. Also, please indicate whether it would be reasonable to assume that the main locomotives used during operations for incoming and outgoing trains would be newly built GE ES44AC locomotives and that ES44AC locomotives would be used to supplement the main locomotives.

10. From Information Request #1, Item #21

- a. **OEA Request:** Proposed Rail Line Operation: Train operations for each alternative, including:
- EPA Tier emissions ratings of locomotives to be used.
 - Amount of diesel fuel to be used.
- b. **Coalition Response:** Locomotives will be similar to north American fleet averages for tiers. A preliminary estimation of diesel fuel to be used may be

between 40 - 70 gallons per car cycle which is a full cycle of a loaded and unloaded train trip.

- c. **OEA Follow-up Request:** To inform OEA's air quality analysis, please provide the most representative scenario of the EPA Tier emissions ratings of the locomotives that would be used. Please confirm whether the midpoint of the provided range (55 gallons per car cycle) is most representative of diesel fuel usage.

11. From Information Request #1, Item #22

- a. **OEA Request:** Employment: Estimated Construction Expenditures
- b. **Coalition Response:** Currently construction expenditures are based on estimates with 25% contingency. For the Indian Canyon Route the Cost is currently estimated around \$1.2 to \$1.5 Billion. For the Wells Draw route the Cost to construct is roughly \$2.5 to \$2.8 Billion.
- c. **EA Follow-up Request:** To inform OEA's analysis of potential socioeconomic impacts, please provide estimated construction expenditures for all routes.

12. From Information Request #1, Item #23

- a. **OEA Request:** Estimated employment in full time equivalent (FTE) employees during construction.
- b. **Coalition Response:** 5000 to 7000 person years is the rough estimate for construction at this time. Over a 2 year period this is roughly 2500 people.
- c. **OEA Follow-up Request:** To inform OEA's analysis of potential socioeconomic impacts, please provide estimates for each alternative route. Additionally, please include annual average and peak workforce estimates, and time of year for peak estimate for each year of construction.

13. From Information Request #1, Item #24

- a. **OEA Request:** Employment: Number and characteristics of property acquisitions and displacements.
- b. **Coalition Response:** On Indian Canyon and Wells Draw around 100 property owners could be impacted. Property will be acquired and displacements determined if necessary. Standard steps will be followed for this process. The detailed design to be completed in the future will allow for exact dimensions for each right-of-way acquisition.
- c. **OEA Follow-up Request:** Please provide the requested information for each alternative route.

14. From Information Request #1, Item #25

- a. **STB Request:** Employment: Description of construction camps (if needed). If not needed, where is it assumed construction workers would reside?
- b. **Coalition Response:** Likely Helper/Price and Duchesne/Myton will host a number of the construction teams. Man camps may be used at certain remote areas and will provide all necessary requirements for suitable services such as catering and washroom facilities that will be properly maintained. If the contractor selects to use man camps, detailed camp information will be produced once a contractor is selected.
- c. **OEA Follow-up Request:** To inform OEA’s analysis of potential socioeconomic impacts, please indicate the size of each “construction team” by alternative route. Indicate, by alternative route, if those teams would lodge in one place and commute to current construction site for duration of construction or move as construction along the line progresses. Indicate if existing accommodations would be used first, and then man camps utilized as needed, or if man camps would be used for duration of construction.

15. From Information Request #1, Item #26

- a. **OEA Request:** Employment: Description of Staffing
 - Number of FTE employees necessary to operate the proposed alternative and their positions.
 - Number of FTE supervising trainmasters, train crew members, section gangs, track inspectors, carman/inspectors, signal technicians, communication technicians, etc.
- b. **Coalition Response:** Total estimated is 50 to 100 FTE including management. No detailed breakdown for supervisors, inspectors, etc. available at this time.
- c. **OEA Follow-up Request:** To inform OEA’s analysis of potential socioeconomic impacts, please provide likely scenarios of labor requirements for each alternative route, including job type, based on anticipated rail operations and maintenance needs.

OEA understands that certain information from Information Request #1, for example Items #27 and #28 regarding detailed water use, will be available later in the Coalition’s development process. OEA will request that information in an additional follow-up information request.

Please also provide the following to inform OEA’s analysis of potential socioeconomic impacts:

16. For construction phase, termini/station cost information, including the following:

- Stations and terminus point construction costs
- Associated employment/labor costs
- Percent of labor and materials supplied locally

17. For construction phase, track construction cost information, including the following:
 - Track, track structures, and communications and signals costs
 - Associated employment/labor costs
 - Percent of labor and materials supplied locally
18. For construction phase, rail car cost information, including the following:
 - New rail cars and engine costs
 - Percent purchased locally
19. For construction phase, other construction cost information, including the following:
 - Excavation, support and maintenance facilities (including any locomotive/car shops and storage sheds), yards, administration buildings, and other anticipated components, not already included above. Include costs of any fencing to restrict public access to the railway and related facilities.
 - Associated employment/labor costs
 - Percent of labor and materials supplied locally
20. For operation phase, expected operations and maintenance costs for rail/terminal upkeep, including employees or labor costs.
21. For operation phase, expected operations and maintenance costs, including employees or labor costs, or operations costs for a similar stretch of railway that can be adapted to estimate the alternative routes.
22. The Coalition's response to Information Request #2 indicated that the proposed rail line would likely not transport crude oil from the Uinta Basin to refineries in Salt Lake City, Utah. Please identify refineries that could potentially accept crude oil from the Uinta Basin or confirm that the following locations (identified in the 2018 Pre-Feasibility Study prepared on behalf of the Coalition by R.L. Bank & Associates, Inc.) represents a reasonable list of potential target markets:
 - Anacortes, Washington;
 - Cattlesburg, Kentucky;
 - Shreveport, Louisiana;
 - Baton Rouge, Louisiana;
 - Garyville, Louisiana;
 - Norco, Louisiana;
 - Convent, Louisiana;
 - Pascagoula, Mississippi;
 - Baytown, Texas;
 - Deer Park, Texas;
 - Galveston Bay, Texas; and
 - Port Arthur, Texas.

Thank you for your assistance. We look forward to receiving this information from you at your earliest convenience, but no later than the date specified above. In addition to Joshua Wayland of my staff, please provide a copy of your response to Debi Rogers of ICF, our independent third-party contractor at 9300 Lee Highway, Fairfax, Virginia, 22031. Please feel free to contact Joshua Wayland at 202-245-0330 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Victoria Rutson". The signature is written in a cursive style with a large initial "V" and "R".

Victoria Rutson
Director
Office of Environmental Analysis