



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

February 28, 2023

Justin Marks
Clark Hill
1001 Pennsylvania Avenue, NW
Suite 1300 South
Washington, D.C. 20004

RE: Docket No. FD 36575, Townline Rail Terminal, LLC – Construction and Operation Exemption – Hamlet of Kings Park, Town of Smithtown, Suffolk County, NY; **Information Request No. 3**

Dear Mr. Marks:

Consistent with 40 C.F.R. § 1506.5(b)(1), the Surface Transportation Board's (Board) Office of Environmental Analysis requests the information below, which is needed to support the environmental review in connection with the above-referenced proceeding. This information will be used to describe current operations, the proposed action, and alternatives, and analyze impacts. Please provide responses to the questions below.

1. Provide detailed information on the anticipated operations associated with the four proposed yard tracks and the 5,000-foot rail line, including:
 - a. Various operations related to the yard tracks and the operational timeframes for those operations.
 - b. Freight operations on site and timeframe for those operations, including potential duration.
 - c. Equipment to be used during operations.
2. What type of lighting will be included in the proposed action for the operations associated with the rail line and yard tracks, e.g., high mast lighting poles?
3. Provide information on the existing road traffic/truck operations of the project site, including number of trucks, how and where material is transported to other areas of Long Island.
4. Describe locomotive refueling operations associated with the proposed action.
5. Describe the revegetation plan for the proposed 150-foot buffer and confirm whether native plant species will be used.

Please provide your response as soon as possible and no later than March 6, 2023. If you have any questions, please feel free to contact Andrea Poole of my staff at 202-245-0305 or by email at Andrea.Poole@stb.com. Thank you for your assistance in this matter.

Sincerely,

Danielle Gosselin
Director
Office of Environmental Analysis

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March 7, 2022

Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20024

Re: Townline Rail Terminal, LLC
– Construction and Operation of a Line of Railroad –
In Suffolk County, NY
Surface Transportation Board Finance Docket 36575
Information Request No. 3

Dear Ms. Gosselin:

Please find the enclosed responses of Townline Rail Terminal, LLC ("Townline") to Information Request No. 3 that the Surface Transportation Board's Office of Environmental Analysis ("OEA") submitted seeking detailed operational information of Townline's proposed rail line.

Introduction: The Operation of Townline Will Result in a Reduction of Certain Recycling Operations at the CarlsonCorp Facility

CarlsonCorp is proposing to develop the Townline rail line on a portion of its New York State Department of Environmental Conservation ("NY DEC") permitted recycling facility - facility permit #1-4734-00304/05. Currently, CarlsonCorp's NY DEC permitted recycling activities allows for outdoor recycling operations over 66 acres of the CarlsonCorp property for CarlsonCorp to receive and process recognizable uncontaminated concrete, brick, asphalt pavement, rock or soil; general fill; unadulterated wood; tree debris; yard trimmings; animal manure and associated bedding material. The NY DEC permit limits the total processing capacity of the CarlsonCorp facility to 365,000 tons per year at a rate not to exceed 1,500 tons per day.

In addition to seeking STB authority for Townline, CarlsonCorp intends to seek NYS DEC permission to modify its existing permit to include two additional waste streams; 1) Non-Hazardous Municipal Solid Waste Combined Incinerator Ash ("incinerator ash") and 2) Non-Hazardous Construction and Demolition Debris ("C&D"). However, CarlsonCorp **is not** planning to request NYS DEC permission to increase the permitted capacity of the facility.

Due to the operations of the proposed Townline rail project, CarlsonCorp will reduce the quantities of organic materials, construction aggregates and soils stored onsite for two reasons.

First, the development of the Townline rail line and associated side track will result in a smaller CarlsonCorp facility footprint for recycling activities from approximately 66 acres to approximately 25 acres. Further, since CarlsonCorp is seeking to add incinerator ash and C&D to its NYS DEC permit, an increase in the processing of incinerator ash and C&D will directly correlate with a decrease in the facility processing capacity of other permitted materials.

Response to Question 1(a): Detailed information on the anticipated operations associated with the Townline Rail Line and side tracks:

Townline intends to serve CarlsonCorp and other Smithtown and Huntington shippers from 6:00 am to 6:00 pm, Monday through Saturday. Townline's hours of operation reflect the hours of operations permitted under the NY DEC facility permit which establishes permissible CarlsonCorp hours of operation.

Townline's daytime operations will consist of Townline crews switching incoming trains to service various yard operations. Additionally, Townline crews will build outgoing train at the end of daily operations for interchange with the New York & Atlantic Railway (NYA). Internal switch activities will occur throughout the day as required by the makeup of the incoming train.

Townline estimates carloads per day to be as follows, depending on demand:

- Approximately 4-5 incinerator ash cars will be switched to the transfer station. The incinerator ash will be received via truck in an enclosed transfer station equipped with dust suppression, negative air system with filtration, and high speed roll up doors. The incinerator ash will be unloaded indoors and loaded into the railcars that are equipped with steel lids. The loaded cars would then be moved onto the railcar storage tracks.
- Approximately 3-4 C&D cars will be switched and loaded within the transfer station. The C&D will be transported into the same facility as the incinerator ash but will be loaded into different railcars that are covered with a tarp.
- Approximately 4-5 aggregate cars will be switched to the aggregate unloading track for unloading operations.
- Approximately 1-2 material cars, including commodities such as equipment and lumber, will be switched to the freight unloading track with material unloaded and stored within the onsite enclosed material storage enclosure.

Response to Question 1(b): Detailed information of anticipated freight operations on site and timeframe for those operations, including potential duration.

Townline will interchange with New York & Atlantic Railway ("NYA"). Townline and NYA will interchange once per day consisting of one train arriving and one train leaving. Train length will **average 16 cars** per day not to exceed 27 cars. NYA will interchange with Townline at night due to passenger operations on the single-track Long Island Railroad ("LIRR") Port Jefferson Branch.

NYA operations are estimated to have a duration of approximately 2 hours depending on the number of cars to be set out and picked up. Daily activities will likely include the following:

- NYA train with approximately 2 locomotives and 16 cars will arrive and stop at the main track switch to the Townline facility east of the Bread and Cheese Hollow Road Bridge on the LIRR Port Jefferson Branch.
- The NYA conductor will reverse the main track switch, the NYA train will proceed into the yard to clear the switch. The conductor will return the main track switch to normal and will walk east to the head end of the train.
- After setting the appropriate handbrakes, incoming cars will be cut off. The NYA locomotives will proceed to the tail track and then proceed west on the escape track to the west end of the yard.
- Locomotives will then tie onto the outgoing cut of cars, a brake test will be conducted, and the train proceeds to the main track switch.
- After receiving permission from the dispatcher, the NYA conductor reverses the main track switch and the outgoing train proceeds onto the LIRR Port Jefferson Branch far enough to clear the switch. The NYA conductor will then return the main track switch to normal and walks to the locomotives at the west end of the train. The NYA train then proceeds west to Fresh Pond Yard.

Response to Question 1(c): Detailed information related to equipment to be used during operations.

Townline will utilize a Trackmobile on site to handle daily switching activities. It is anticipated that the Trackmobile will be a diesel-powered engine sufficient to handle 4-5 car cuts at a time. As an alternative to a diesel Trackmobile, Townline would utilize an electric Trackmobile vehicle dependent upon market availability of an electric model.

NYA will decide on the equipment it utilizes to interchange with Townline. It is anticipated that NYA would utilize 2-3 locomotives. The NYA fleet currently includes 2 PR20B Tier III+ locomotives.

Response to Question 2: Lighting to be included for the proposed Townline rail line.

The proposed Townline rail line and associated track will utilize lighting poles not to exceed 25 feet in height.

During interchange, NYA crews would utilize lighting in accordance with AREMA recommended levels of illumination for flat switching yards. As such, a recommended illumination of 2.0 foot-candles will be provided at the east and west ladders and along the pathway between the east and west end of the yard.

Response to Question 3: Information on the existing road traffic/truck operations of the project site, including number of trucks, how and where material is transported to other areas of Long Island.

Incinerator Ash

CarlsonCorp currently transports approximately 80,000 tons of incinerator ash from Covanta Huntington 26 miles east to the Brookhaven Landfill via truck. This incinerator ash is transported utilizing approximately 4,444 tractor trailer trips per year totaling 231,000 lane miles. In other words, transporting to the Covanta Huntington incinerator ash requires five tractor trailers hauling 6 days per week 6:00 am – 6:00 pm.

Under the proposed Townline rail project, those truck trips would be replaced by one truck hauling 1-mile round trip to the CarlsonCorp facility for a total of 4,444 lane miles per year. Under the propose Townline project, utilizing rail to transport the incinerator ash will require approximately 3.5 railcars per day or a total of 800 railcars per year.

If the Brookhaven Landfill were to continue its operations, the Townline rail project would save approximately 226,000 truck lane miles per year for the transportation of incinerator ash. However, considering that the Brookhaven Landfill will be closing and there will be no alternative disposal option on Long Island, this estimate of truck lane miles saved per year is a conservative estimate of truck lanes saved if Townline becomes operational.

Construction and Demolition Debris (C&D)

Currently, CarlsonCorp works with other local C&D facilities in the Kings Park Industrial Area. These C&D facilities independently process approximately 60,000 tons of C&D per year. These local facilities must also transport the resulting waste 26 miles to the Brookhaven Landfill. The transportation of this C&D requires approximately 4,600 tractor trailer trips per year traveling 239,000 lane miles. In order to transport this material, five tractor trailers haul 6 days per week from 6:00 am through 6:00 pm. Townline provides a new transportation option for this C&D.

If Townline is utilized in place of those truck trips, the result would be one truck hauling 5 miles round trip to the CarlsonCorp facility for a total of 23,000 lane miles per year. If the C&D is transitioned to rail via Townline, transporting the C&D by rail would require approximately 5.5 railcars per day or 1,250 railcars per year.

If the Brookhaven Landfill were to continue its operations, Townline would save approximately 216,000 truck lane miles per year for the transportation of C&D. Considering that the Brookhaven Landfill will be closing, the anticipated truck lane miles saved per year (once Townline is operational) would likely exceed this estimate since any alternative landfill will be off Long Island.

Recyclable Materials

The CarlsonCorp facility currently processes 365,000 tons per year of recyclable materials which would be reduced to 215,000 tons if the Townline project is completed. Currently, residual materials and other non-recyclable materials that are a byproduct of CarlsonCorp's recycling operation are transported for disposal at the Brookhaven Landfill.

CarlsonCorp estimates that its recycling operations will produce 30,000 tons of residual materials and other non-recyclable materials that would need to be disposed of at the Brookhaven Landfill. Without a rail option, transporting this material requires approximately 1,050

tractor trailer trips per year totaling 54,600 lane miles. This requires one tractor trailer hauling 6 days per week 6:00 am through 6:00 pm.

Once the Townline rail project is operational, those truck trips would be fully eliminated. This material would be moved onsite to the indoor transfer station and loaded into a C&D railcar. Moving these residual materials by rail would require 1 railcar per day at a total of 50 railcars per year.

If the Brookhaven Landfill were to continue its operations, the Townline rail project would save 54,600 truck lane miles traveled per year for this material. However, since Brookhaven Landfill is closing, this material will need to be disposed of elsewhere. Therefore, this estimate of truck lane miles saved by the operation of Townline is conservative and the lane miles traveled savings would likely be far greater.

In total, once operational, Townline's proposed rail line has the potential to save a conservatively estimated 496,600 lane miles traveled per year for incinerator ash, C&D, and recyclable byproducts. As stated, these calculations are conservative because they are based on transportation to the (soon to close) Brookhaven Landfill. Without a rail option, the incinerator ash, C&D, and recyclable byproducts will need to be trucked off Long Island and therefore the proposed Townline rail line is likely to save a far greater amount of truck lane miles per year than is estimated here.

Aggregate and Construction Materials

CarlsonCorp and Townline also propose to use the Townline proposed rail line to import aggregate and construction materials to supply the local Huntington and Smithtown communities and businesses. The proposed Townline rail line and CarlsonCorp are located within the Kings Park Industrial Park along with several businesses which consume aggregates and construction materials.

Townline could potentially provide aggregate service to these companies that include a local asphalt plant, cement ready-mix plant, and a precast producer. These companies use approximately 125,000 tons of aggregate per year. This equates to approximately 7,000 truck trips per year. Currently, those aggregates and materials travel no less than 70 round trip miles totaling 490,000 lane miles per year. Transport of this material requires six tractor trailers per day hauling 6 days per week 6:00 am through 6:00 pm.

Under the proposed Townline rail line, aggregates and construction materials would be shipped via rail and stockpiled at the CarlsonCorp facility. During normal operation hours, the aggregates and construction materials would be loaded and shipped locally using one tractor trailer. These local businesses are located within 2 miles of the Townline proposed rail line and transportation by truck is estimated to be 1,400 lane miles per year. If these aggregate and construction materials were transitioned to Townline, truck lane miles would potentially be reduced by 488,600 lane miles by utilizing a total of 5.25 railcars per day or 1,250 rail cars per year.

Cement for Concrete Producers

The local precast and ready-mix businesses consume 10,000 tons of bulk Portland Cement per year. This represents 375 truck trips per year 60-miles roundtrip totaling 23,000 lane miles traveled. All lane mile impacts would be eliminated as the ready-mix plant is located onsite at

the CarlsonCorp facility. One railcar every other day would be required to offset the 23,000 lane miles traveled per year.

Based on the lane miles saved relating to recycling and the importation of local business raw materials, there would be an estimated total of a total of 17,469 truck trips per year for a total of 1,008,200 lane miles eliminated per year. Under the proposed Townline rail line, the 15 trucks required to move the above aggregate/construction materials, and concrete would be reduced to only 3 trucks. This will be a 66% reduction in emissions, traffic and the negative impacts heavy truck traffic places on our infrastructure. This calculation is based on traveling to the Brookhaven Landfill for disposal, should no rail facilities be constructed to service the commodities and waste infrastructure on Long Island, it would mean a quintupling of transportation equipment needed to take materials off Long Island.

Other Potential Townline Customers

The proposed Townline rail line could potentially service other local businesses. For example, automobiles are currently imported into a permitted vehicle storage facility located in the Kings Park Industrial Park Area for storage on behalf of local dealerships. The proposed Townline rail line provides a rail option for these vehicles to be delivered in place of trucks.

Response to Question 4: Locomotive refueling operations.

If a diesel powered Trackmobile is utilized, refueling is anticipated to be direct-to-vehicle as required for Townline operations. If an electric Trackmobile is utilized, charging of the vehicle would be on-site as required for Townline operations.

NYAR locomotives will not be refueled on site.

Response to Question 5: A description of the revegetation plan for the proposed 150-foot buffer and confirmation that native plant species will be used.

The Townline vegetation plan will include a berm and planted buffer area. The Townline plan would include 16.4 acres of landscaped berm. The berm is envisioned to be 150 – 190 feet wide and 25' in height. Townline estimates that it will utilize native plant species to include over 1,700 evergreen trees planted in a staggered configuration comprised of the following mix of evergreen species: Arborvitae, Junipers, Leyland Cypress, Douglas Fir, Spruce and White Pines.

If you have any questions related to these responses, please let me know.

Sincerely,



Justin J. Marks
Counsel for Townline Rail Terminal, LLC

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March 20, 2023

Danielle Gosselin
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Re: Townline Rail Terminal, LLC
– Construction and Operation of a Line of Railroad –
In Suffolk County, NY
Surface Transportation Board Finance Docket 36575
Supplement to Information Request No. 3

Dear Ms. Gosselin:

Townline Rail Terminal, LLC ("Townline") is providing the following narrative as a supplement to Information Request No. 3, Question 3 which requests information on the existing road traffic/truck operations of the project site, including number of trucks, and how and where material is transported to other areas of Long Island.

Currently, CarlsonCorp provides services to neighboring industrial facilities utilizing fifteen (15) CarlsonCorp trucks and trucks owned by those neighboring businesses. Under the proposed Townline rail line and the associated proposed transfer facility, the CarlsonCorp property would reduce the number of trucks required to service these neighboring businesses down to an average of 3 trucks (owned by CarlsonCorp). The result would be a net reduction of at least twelve (12) trucks.

Currently, Carlson Corp utilizes a fleet of twenty-five (25) trucks to service numerous contracts across Long Island unrelated to the proposed Townline project. Those trucks leave the facility in the morning and generally return at the end of each day during normal operating hours. These trucks do not idle on the property throughout the day, and they do not enter and leave the facility multiple times per day. The trucks are all late model and meet or exceed Tier 4 emission and certified clean idle standards. Under the proposed action three (3) of these trucks will be repurposed to service the local industrial facilities neighboring the CarlsonCorp property.

CarlsonCorp is also home to a third party ready-mix concrete plant which has its own fleet of fifteen (15) ready mix trucks that service the local communities. Under the proposed Townline project those trucks would remain on site. In addition, CarlsonCorp maintains a fleet of five (5) service trucks for welding, maintenance, and repair to support ongoing CarlsonCorp operations. The proposed Townline project will not result in any changes to these activities.

March 20, 2023
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If you have any questions related to these responses, please let me know.

Sincerely,



Justin J. Marks
Counsel for Townline Rail Terminal, LLC

From: [Marks, Justin J.](#)
To: [Poole, Andrea](#)
Cc: [Anthony Viscoso](#); [Les Poinelli](#); [Toby Carlson](#); [Candice Andre](#)
Subject: Detailed Description of the Vegetative Buffer
Date: Wednesday, March 22, 2023 3:41:07 PM

Andrea/Candice:

The proposed berm along the northern LIRR ROW is 9.2 acres in size and will range from 150' to 190' in width at its base and will be 25' in height. It will be planted with 1,360 trees. The proposed berm on the remaining segments of the facility will include approximately 7.2 acres and will include the planting of 1,090 trees.

The total berm and buffering provided is approximately 16.4 acres and a total of approximately 2,450 trees.

Justin J. Marks

Attorney at Law

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