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November 13, 2020

Ms. Cynthia Brown, Section Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings
November 13, 2020
Part of
Public Record

Re: FD 36447, Lake Providence Port Commission—Feeder Line Application—Line of
Delta Southern Railroad Located in East Carroll and Madison Parishes,
Louisiana

Dear Ms. Brown:

Accompanying this letter for filing in the referenced docket are corrected pages 2 and 27. On page 2, the final sentence of the first full paragraph has been corrected to reflect the milepost designations of the "20-mile segment of the Corridor" as being "between MP 471 and MP 491." On page 27, the same correction has been made to the third line from the bottom of the page.

If you have any questions, please give me a call.

Respectfully submitted,

/s/ Richard H. Streeter

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RHS:rs

Cc: All parties previously served.

As explained in the accompanying Petition Seeking Expedited Consideration and as confirmed below, this Application must be considered in conjunction with the *Southeast Arkansas and Northeast Louisiana Multimodal Freight Corridor Improvement Project* and an INFRA Grant awarded to SEAEDD on behalf of a public-private partnership composed of SEAEDD, LPPC, the Madison Parish Port Commission, NLA and DSR by the United States Department of Transportation (DOT). The Grant funds are to be used to reopen the entire Corridor, including the segment at issue herein which is impassable and has not been used for common-carrier rail service for at least three years. Because DSR has declined to commit the needed funds to restore these tracks, the Board should authorize LPPC to acquire ownership of the 20-mile segment of the Corridor between MP 471.0 and MP 491.0.

I. SHOWINGS UNDER SECTION 1151.3

A. Identification of Line to be Purchased (49 CFR § 1151.3(a)(1))

1. The name of the owning carrier

The name and address of the incumbent carrier is as follows:

Delta Southern Railroad, Inc.
469 Port Road
Madison Parish Port
Tallulah, LA 71282

2. The exact location of the line to be purchased including milepost designations, origin and termination points, stations located on the line, and cities, counties and States traversed by the line.

The segment of the Corridor that LPPC seeks to acquire extends between MP 471.0 and MP 491.0 and various ancillary tracks attached thereto. This

O. Owning Railroad's Employees Who Service the Line (49 CFR 1151.3(a)(15))

No common carrier service is provided over this segment of DSR's Line. LPPC is not aware that DSR performed any maintenance over this segment of its Line.

II. ENVIRONMENTAL ISSUES

LPPC respectfully submits that the Transaction will not result in any action that would normally require environmental documentation. Plainly, had DSR decided to rehabilitate the segment, no authority or environmental documentation would have been required.

LPPC further notes that in FRA has already undertaken an evaluation of the environmental impact of the entirety of actions covered in the INFRA Grant:

in accordance with NEPA (NEPA 42 U.S.C. 4321 et seq.), other environmental statutes, related regulatory requirements, and FRA's NEPA implementing regulations (23 CFR part 771, Environmental Impact and Related Procedures.

As of this moment, FRA has determined that the preliminary actions funded under the grant are categorically excluded from detailed environmental review pursuant to 23 CFR 771.116(c)(1), (3), and (4). In addition, SEAEDD is required by the terms of the Statement of Work to submit documentation that FRA determines is necessary to comply with the NEPA. Because this Feeder Application is not linked to the need to rehabilitate the entire Corridor, but only the segment that is located between MP 471.0 and 491.0, LPPC submits that there is good cause for the Board to accept its Feeder Application for filing without any duplication of FRA's environment review. The Board should note