

Darcy Mitchem, Recreation Chair
Toutle Valley Community Association
1405 Sightly Rd
Toutle, Wa 98649

Sept 17, 2017

Surface Transportation Board
Case Control Unit,
Washington, DC 20423
Attn. Josh Wayland

Re: Docket AB1244X and AB 1243X

Dear Mr. Wayland,

Thank you for this opportunity to review the EA and Historical Report for the Columbia & Cowlitz Railway and the Patriot Woods Railway abandonment exemption. The Toutle Valley Community Association is a group of Toutle residents that work on economic, recreational, and quality-of-life issues in our community. Much of the railway traverses our community, and is an integral part of our history and culture. Please consider the following comments, which apply to both lines.

HISTORY:

Although the EA/Historical Report correctly identifies the line as important to the history of the Weyerhaeuser Company and local logging, the railway's historical and cultural importance is understated, and the findings are incomplete. Although Weyerhaeuser acquired the line in 1928, portions of the railroad are much older and tell an even more compelling story, not just of Weyerhaeuser, but of the Collins Companies, industrial collaboration of the gilded age, and how railroad logging and logging camps built the region into one of the epicenters of timber production in the world.

According to the history of the Collins Companies (www.collinsco.com) Everell Stanton (E.S.) Collins began building his company in Ostrander, which is near milepost 8.5 on the line.

“The operation became known as Ostrander Railway & Timber Company (ORT), which incorporated in 1896. The ORT was the **third logging railroad in the Northwest**. Twelve miles of standard gauge line was handled by Shay, Heisler, and Climax steam locomotives. E.S. expanded his operations by forming the Silver Lake Railway & Lumber Company (1903) and the Cowlitz Development Company (1923). To add to all of this, in 1902, E.S. was elected to the Washington State Legislature.”

The 1910 Railroad Commission map of the state of Washington clearly shows the Ostrander Railway and Timber Company railroad in the current location of the Patriot Woods/Columbia & Cowlitz junction at Ostrander. It also depicts portions of the Columbia & Cowlitz line west of the Cowlitz River. The map is housed digitally by Washington State University:

<http://content.libraries.wsu.edu/cdm/singleitem/collection/maps/id/568/rec/3>

While the railway structures such as bridges and trestles are easily recognized for their historic importance, the corridor and grade of the railway itself are also of great historic and cultural significance as one of the oldest--and one of the last--logging railroads in the state. This line hauled wood from 1896 until the last lumber was shipped from Green Mountain mill.

Another vital historical feature of the Patriot Woods Railway is the railway's part in the story of the eruption of Mount St. Helens in 1980. Although the eruption occurred less than 50 years ago, this spectacular geologic event is so key to the history of Washington, that structures may be considered for historical listing anyway due to their "exceptional significance". The railroad bridge across the South Toutle River was destroyed by the mudflows, but it was rebuilt for rail use. Piers of the pre-eruption bridge are still there below the newer bridge. The EA/Historic Report does not mention the South Toutle Bridge at all, and it should be included.



South Toutle Bridge during reconstruction



Railway eruption damage (USGS photos)

Before the eruption, the logging railway passed what is today the "end of the line" at mp 30 proceeded up the Toutle Valley to Camp Baker. A side spur traveled to 12 Mile Camp. All that is left is a few bridge piers and some buried railway that has been converted to logging road. The mudflows continued to the Cowlitz River and passed under the main bridge on the Columbia & Cowlitz Railway. The EA/Historic Report should include the railway's overall contribution to the story of the eruption of Mount St. Helens.

On a cultural, and more personal, note, many of the families in the Toutle Valley have lived here for generations, and we grew up listening to the stories our fathers, grandfathers, or even great-grandfathers told of working in and around this logging railroad. From riding the "speeders" to Camp Baker or Headquarters Camp, to falling old growth that was reloaded, to listening to the trains pass with their logs and lumber, to watching the Baird Creek trestles slowly slip into the past, many of us have a deep cultural connection to this railway. We need to preserve this important part of our shared history.

Because of these unique cultural and historic features of the railway, and its importance as a symbol of our past, the Toutle Community strongly supports railbanking as a trail instead of abandonment.

LAND USE:

Most local land use and economic development plans in the region call for more trails, outdoor recreation, improvement in quality-of-place, and better access to our rivers and streams. By railbanking and converting to a trail, all these items can be improved. Outright abandonment, without railbanking and trail, would be adverse to the goals of these plans, and represents a huge missed opportunity.

Cowlitz County Comprehensive Plan

Cowlitz County Parks, Recreation and Habitat Plan

Cowlitz County Shoreline Master Plan

Fire and Ice Scenic Loop

USFS Strategic Investment Plan

Mount St Helens Wildlife Area Plan

Toutle Valley Community Action Plan

2009 Metropolitan and Regional Transportation Plan

SW Washington Economic Development District Comprehensive Economic Development Strategy 2016

Cowlitz/Lewis Economic Development District Plan

Washington State Trails Plan 2013

Washington State Outdoor Recreation Strategy (SCORP) Plan

Cowlitz Economic Development Council Strategic Plan

Governor's Blue Ribbon Coalition on Outdoor Recreation

2016 SW Wash. Bicycle/Pedestrian Assessment

WATER RESOURCES

The EA fails to state that the line crosses the South Toutle River and several other fish bearing streams including Hemlock Creek, Wyant Creek and Studebaker Creek. These waterways contain federally listed species of fish. The map of the Patriot Woods Railway should include all these stream crossings. Some long segments of the line are stream adjacent and water quality may be affected during salvage or abandonment activities. The ties and rails from the area of the

Landfill to Milepost 30 were removed several years ago, prior to the abandonment process. The grade and wooden culvert across Studebaker Creek have already been removed, and the fill has been end hauled onto the railroad grade, increasing the height of the grade by several feet and making public use as trail more difficult. It appears these abandonment and salvage activities proceeded without STB approval or oversight.

HAZARDOUS MATERIALS

Railroad ties have already been removed and disposed of between the landfill and end of line.

BIOLOGICAL RESOURCES

The EA is incomplete in the list and treatment of affected threatened/endangered species. In addition to the federal species listed, several state priority habitats and species occur along the line. At least one run of each of the following species is federally threatened including: Lower Columbia Chinook, Chum, Coho and Steelhead. The railway crosses the South Toutle River which is critical habitat for winter run Lower Columbia Steelhead Trout. Smelt (eulachon) in the Cowlitz River are federally threatened, and the river lamprey is a federal species of concern. All these aquatic species live in the waters adjacent to or under the railway. Many of these species exist in tributary streams crossed by the railway like the South Toutle River (not just the Cowlitz River) which is the only waterway the EA addresses.

Western Wahoo (state species of concern plant) grows along Studebaker Creek, and when the culvert was removed at least one wahoo plant was also removed.

CONCLUSION

The Toutle Valley Community Association strongly supports Cowlitz County's railbanking the line as a trail instead of abandonment of the Columbia & Cowlitz and Patriot Woods Railways, and suggests our comments be incorporated into an updated EA/ Historic Report. Given the changes that need to be made to more accurately reflect the history and environmental conditions of the railway, a stay or an additional historic review may be necessary.

Sincerely,

Darcy Mitchem



Toutle Valley Community Association

Recreation and Access Chair