

The R.J. Corman Railroad Company Pennsylvania Lines formally petitioned the federal Surface Transportation Board (STB) to take over ownership of the existing rails-to-trails recreation area (Snow Shoe Rail Trail) from Wallacetown (Clearfield County) to Gillingtown (Centre County), and to initially construct and operate a rail line on that portion from Wallacetown to Gorton (Centre County).

The purpose of this rail line is to run trash trains from large New York and New Jersey cities to a giant landfill proposed by Resource Recovery, LLC in the Gorton area in Rush Township. The funding source and co-petitioner of this rail line is Resource Recovery. In fact, without Resource Recovery's initiative and funding there would be no STB petition.

This strategy employs a back-door approach to Resource Recovery's successive attempts to get this proposed landfill permitted by the Pennsylvania Department of Environmental Protection (DEP). From 2004, when Resource Recovery first announced plans for the landfill, trash delivery was to be by road. To achieve this, Resource Recovery proposed to fund and build a dedicated I-80 interchange near Gorton. Resource Recovery failed to get the approvals and/or support needed from Centre County Commissioners, Planning Office, Metropolitan Planning Organization; PennDOT; and the Federal Highway Administration among others. As a result, DEP suspended their application in October 2006 until Resource Recovery could solve and clarify their road access issue.

Without this rail line, Resource Recovery's chances for a landfill permit for any significant amount of tonnage are virtually nil.

RJCP and Resource Recovery augmented their STB petition with letters from *potential* rail line users -- primarily coal, gas, and quarry-based industries. They hoped to convince the STB that their rail line can be justified without the landfill being the dominant customer.

Although most of these letter endorsements they recruited may be well intentioned, they are -- at best -- minor users of the proposed rail line.

The result is, by law, the STB's EIS analysis must assess the impacts of the landfill-rail line system which is directly linked. The rail line cannot be viewed as a separate, single action which allows the EIS to assess only the environmental impacts of the rail line construction and operation and exclude the impacts of the landfill and the cargo (trash). Instead, as appropriate to NEPA and the STB's own regulations, the rail line construction, operations, hauled contents, and full range of landfill operations must be viewed as an *interdependent* connected action because the rail line's purpose and justification is to service the landfill -- the only *significant* shipper of record in the draft EIS.

These proposed industrialization activities are being targeted to a prime, highly valued, recreational and wild area that already provides a substantial and rapidly-growing, outdoor recreation-based business and economy. The seemingly superficial rather than careful deliberative analysis of impacts to rural outdoor recreation will cost our local communities economically and business-wise much more than

our communities could possibly gain in the short-term from a full-time landfill and a part-time railroad. Because the proposed landfill "benefits" are projected, the harms to our outdoor recreation economy should be adequately and accurately projected based on historical growth and including loss of revenue to all the mom-and-pop businesses that cater to the area's visitors and given equal weight. It's not just the rail-trail.

I believe you will find the lost long-term outdoor recreation revenues will easily out distance any short-term proposed landfill-rail line projections.

Consider seasonal properties (including their valuation and tax base), hunting and the impacts to lost foraging areas; fishing and the impacts to sensitive fish habitat; trapping, biking, ATV use, wildlife watching, bird watching, walking, jogging, loss of access to historic and cultural sites.... The list goes on.

Submitted on this 14th Day of September in Philipsburg, PA by
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