

September 14, 2010

Surface Transportation Board
395 E. Street, S.W.
Washington, DC 20423-0001

RE: HCT Comments at 6:00 PM, 9/14/10, STB Public Meeting on 9.3 Rails to Trails Railroad Request for Reactivation

The Headwater Charitable Trust (HCT) is a 501(c) 3 organization formed to promote improved quality of life through natural resource conservation projects that result in community improvement, rural economic stability, and environmental enhancement projects in an 8 county area, including Centre and Clearfield Counties. The Headwaters Charitable Trust is a partnering organization to the Headwaters Resource Conservation and Development Council.

Headwaters Charitable Trust is the owner of the Snow Shoe Rails to Trails trail system. The Trust has invested years of effort and hundreds of thousands of dollars into the development, improvement, and maintenance of the Snow Show Rails to Trails system. Headwaters Charitable Trust considers this trail system as one of our greatest successes for the following reasons:

- This trail system has become a major recreational asset to the local communities, and a regional asset drawing users from a much larger area, including both Pennsylvania and surrounding states.
- The trail system is estimated to bring \$8 million annually to the surrounding local communities, through trail users who spend money in the area while enjoying use of the trail.
- The trail system provides a recreational link between local communities.

The Snow Shoe Rails to Trails has reached this level of success because it is a vital link to approximately 95 miles of other trail systems, creating 126 miles of connected trails (see attached map). It is the trails "connectivity" created by the Snow Shoe Rails to Trails system, that is a major factor in its success.

Loss of the 9.3 miles of trail due to reactivation, without requiring its replacement, would sever the connected 126 mile trail system, and severely degradate this local and regional recreational asset. Communities would no longer be linked by a connected recreational trail. Users from beyond the local area would have less reason to travel to the area to use the connected trails, and the economic impact of the connected trail system would be severely diminished.

Headwaters Charitable Trust believes replacement of the 9.3 mile trail system will allow this local and regional recreational asset, and its important local economic impact to continue. That cannot happen without the Surface Transportation Board's (STB) requirement that the new rail user replace and reconnect the 9.3 mile "missing link" in the connected trail system, should the STB rule to allow reactivation. This condition for replacement of a suitable trail is imperative for the recreational, economic, and community link aspects that this trail system provides.

Additionally, Headwaters Charitable Trust has spent \$655,995 for repairs to the Peale Tunnel to prevent the collapse of that tunnel. \$555,195 of that cost was provided through Federal Transportation Enhancements (TE) funding. If the Rails to Trails is reactivated as a rail line system, Headwaters Charitable Trust must repay the \$555,195 Transportation Enhancements funded portion of the Peale Tunnel repair work completed. If HCT had not undertaken these repairs, it is likely that the tunnel would have collapsed. Millions of dollars would have been required to reconstruct the tunnel by a new rail user. Thus, HCT's work on the tunnel has a direct economic benefit to a new rail user.

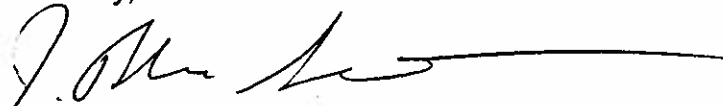
HCT does not oppose or support the reactivation of the 9.3 mile section. Rather, we request that if the STB should rule to reactivate the 9.3 mile section, as part of that ruling the STB require the new rail user to:

- 1. Replace the 9.3 miles with a suitable trail to reconnect the otherwise severed 126 mile trail systems.**
- 2. Require that the \$555,195 TE monies spent to repair the Peale Tunnel be repaid to the HCT, so that we can meet our obligation to repay the Transportation Enhancement Peale Tunnel repairs funding.**

Should the STB act to allow the reactivation of the 9.3 miles of trail system with the above two conditions, the HCT stands ready to work with the new rail owner to find a suitable trail replacement link, vital for the surrounding local communities, **to mitigate the impact of a trail reactivation.**

Thank you for the opportunity to give additional comments on the "draft" Environmental Impact Statement (EIS), for the proposed Snow Shoe Rails to Trails reactivation.

Sincerely,

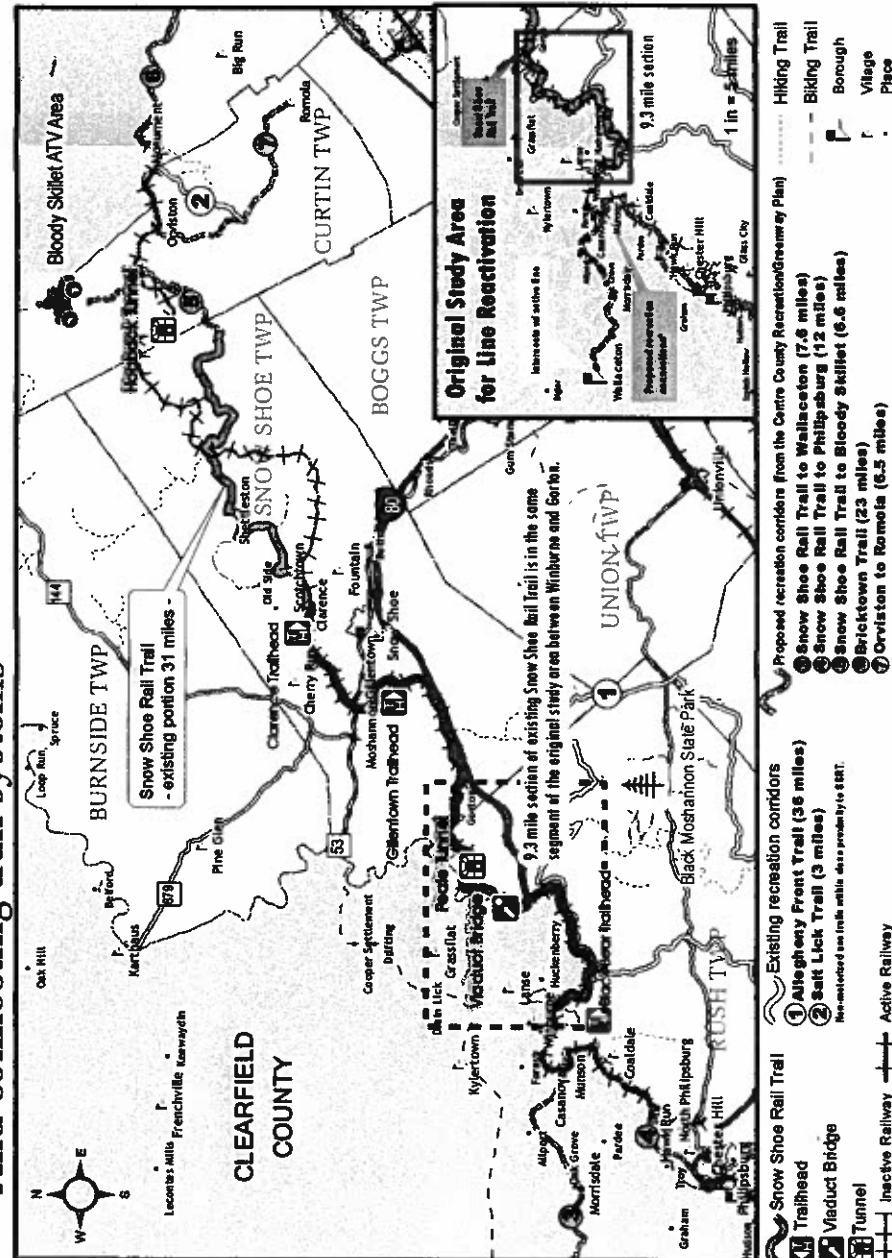


J. Alan Stewart, Chairman
Headwaters Charitable Trust, Inc.
478 Jeffers Street
DuBois, PA 15801

Snow Shoe Rail Trail And connecting trail systems

CENTRE COUNTY, PA

1 in = 3 miles
0 0.5 1 2 3 4 Miles



Prepared by the Centre County Planning & Community Development Office, 09-09-2010.