



Headwaters Charitable Trust

EI-16387

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478 Jeffers Street
DuBois, Pennsylvania 15801

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February 16, 2009

Danielle Gosselin
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

RE: Environmental Filing STB Finance Docket No. 35116

As an interested party we are submitting written comments regarding potential socio-economic and recreational impacts associated with the reactivation of the Beech Creek Rail Line as per the Surface Transportation Board's invitation issued in Environmental Filing STB Finance Docket No. 35116.

The Headwaters Charitable Trust is a 501(c)3 organization that works to improve quality of life through natural resource conservation projects and grants that result in community improvement, rural economic stability and environmental enhancement. The Trust currently holds title to the 9.3-mile section of the Snow Shoe Rail Trail (that includes the Peale Tunnel and Viaduct Bridge) which it leases to the Snow Shoe Rails to Trails Association (SSTRA).

Recreational Impacts

In terms of recreational impacts associated with reactivation of the former Beech Creek Rail Line, most obvious would be the loss of a much-valued regional recreation asset, the Snow Shoe Rails to Trails network.

The Snow Shoe Rails to Trails Association (SSTRA) currently has close to 2400 members from across the Commonwealth that regularly utilize this recreational asset, year round. This trail, which is open to both motorized and non-motorized users, extends approximately 19 miles from the town of Clarence to the town of Winburne. Users include hikers, bikers, all terrain vehicle (ATV) & snowmobile operators, and cross-country skiers. Reactivation of the rail line would essentially eliminate over nine miles within the heart of this multi-use trail.

Not only does reactivation directly impact the Snow Shoe Rail to Trail itself, it would have a regional recreational impact since the Snow Shoe trail provides linkages to a significant amount of additional miles of recreational trails. For example, the trail links to over 23 miles of Township roads that are legally open for ATV use. Also, within the next year or so, the Snow Shoe Rail to Trail will connect via Snow Shoe Township roads



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to the Bloody Skillet ATV Park on the east end of the trail. The Bloody Skillet ATV riding area, located in Centre County, consists of 37 trail miles. This planned extension to the east segment of the Snow Shoe Rail to Trail also provides linkage to another recreational trail, the Allegheny Front Trail, which has an estimated trail length of 40 miles. Plans are also in place to extend the Snow Shoe Rail to Trail west into Philipsburg connecting the new Black Bear Trailhead with a local restaurant, the Casanova Nostalgia.

The majority of SSRTA's membership is ATV enthusiasts, some of which travel great distances to utilize this extensive trail network. Finding locations to legally ride ATV's is a critical issue in PA as identified by the PA Department of Conservation & Natural Resources (DCNR). According to the DCNR study entitled "Pennsylvania's ATV Riders and their Needs", all terrain vehicle (ATV) riding in Pennsylvania is a fast growing activity. Much of the riding is taking place on private land, but the availability of that land is declining. Problems with the availability and accessibility of trails and riding opportunities were of primary importance.

Socio-Economic Impacts

A significant investment of federal, state, and local dollars and resources would be lost if the line was reactivated. Over \$1 million has been invested in the development of the Snow Shoe Rail to Trail. See attached documentation.

In terms of trail replacement costs, we obtained an estimate from our engineer of \$200,000 per mile for new trail, \$2-2.5 million for construction of a bridge to cross the Moshannon Creek and \$1 million per bridge needed to cross Black Bear Run and Six Mile Run. This does not include the cost of design and permitting, which could be quite costly due to the amount of stream crossings and associated wetlands. As the numbers reveal, it would be significantly more costly to replace this recreational asset.

Another significant economic impact would be to the local communities and their businesses that rely on these trail users for generating income. New businesses have been created due to the popularity of this trail system. According to the 2004 DCNR study mentioned earlier, ATV riders spend a sizable amount of money pursuing their sport with a typical ATV trip within Pennsylvania involving over \$200 of expenditures. Such trail users require maintenance and repair services for their equipment, supplies, fuel, food, and lodging.

A local economic impact evaluation of the Snow Shoe Rail to Trail was prepared back in 2004 and most recently was updated to reflect 2008 dollars. According to the addendum, it is projected that the impact of over 2,350 motorized users on the Snow Shoe Rail to Trail equates to over \$8 million in annual expenditures. See attached documentation.

Your contribution is tax-deductible. The Headwaters Charitable Trust is a nonprofit 501 (c) 3 organization registered in Pennsylvania. A copy of the official registration and financial information may be obtained by calling toll free, within Pennsylvania, 1-800-732-0999. Registration does not imply endorsement.



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As the trail expands and membership continues to increase this economic impact will also continue to grow. In a rural area where manufacturing and other traditional forms of economic growth are insignificant or non-existent, tourism is crucial to growing new economies for our rural communities.

In closing, we ask that the Surface Transportation Board thoroughly evaluate the economic and recreational impacts that we have outlined above before formulating any decisions regarding reactivation of the Beech Creek Rail Line. We request that any action to reactivate the rail system require that the party petitioning for reactivation be required to construct an alternate trail system connecting the otherwise severed sections of the trail, or that the petitioning party provide Headwaters Charitable Trust with sufficient funds to replace the 9.3 mile trail system in addition to supplying funds to reimburse DCNR and Headwaters Charitable Trust for grant monies and other costs incurred in development of the 9.3 mile trail section.

Sincerely,

J. Alan Stewart, Chairman
Headwaters Charitable Trust

SNOW SHOE TRAIL

ADDED EXPENSES

NOVEMBER 2004 THROUGH SEPTEMBER 30, 2008

9.3 MILES

PUBLIC GRANT OBLIGATIONS REMAINED THE SAME

PRIVATE ENDEAVORS - IN-KIND

GILLETOWN TRAILHEAD IN-KIND STAFF HOURS

\$ 1,184.12 \$ -

MANAGEMENT -- DEVELOPMENT -- OVERHEAD

LIABILITY INSURANCE COSTS

\$ 3,549.00 \$ 1,699.97

AUDIT AND 990 PREPARATION COSTS

\$ 980.00 \$ 469.42

LEGAL FEES AND MILEAGE

\$ 6,405.50 \$ 6,405.50

STAFF HOURS NOT REIMBURSED ON GRANTS
OR USED AS IN-KIND

\$ 8,008.06 \$ 8,008.06

TOTAL ADDED EXPENSES

\$ 20,126.68 \$ 16,582.95

TOTAL EXPENDITURES AS OF NOVEMBER 2004 BEFORE LETTER OF UNDERSTANDING

\$ 1,002,722.51 \$ 687,904.81

TOTAL EXPENDITURES AS OF SEPTEMBER 30, 2008

\$ 1,022,849.19 \$ 704,487.76

SNOW SHOE

PUBLIC GRANT OBLIGATIONS 9.3 MILES OF TRAIL

Updated to September 30, 2008

GRANTOR	PROJECT TITLE	GRANT PERIOD	GRANT AWARD	9.3 MILES
DCNR	RAILS TO TRAILS FEASIBILITY STUDY	07-01-1995 TO 12-31-2000	\$ 15,000.00	\$ 2,595.00
EPA	ALLIANCE FOR CHESAPEAKE BAY	05-11-1998 TO 06-30-1999	\$ 10,000.00	\$ 1,730.00
DCNR	SNOW SHOE DESIGN SAFETY REPAIRS	06-04-1999 TO 12-31-2003	\$ 95,800.00	\$ 65,548.00
PDOT	SNOW SHOE CONSTRUCTION SAFETY REPAIRS	02-10-2000 TO 02-10-2005	\$ 555,195.00	\$ 555,195.00
USDA FORESTRY	SNOW SHOE ATV TRAIL	09-30-2001 TO 09-30-2005	\$ 30,000.00	\$ -
DCNR	SNOW SHOE TRAIL DEVELOPMENT REPAIRS TO SMALL BRIDGES	05-01-2002 TO 12-31-2005	\$ 105,000.00	\$ 28,452.76
DCNR	GILLETOWN TRAIL HEAD	01-01-2006 TO 12-31-2009	\$ 100,000.00	\$ -
TOTAL GRANTS			\$ 910,995.00	\$ 653,520.76

PRIVATE ENDEAVORS

IN-KIND

9.3 miles

PURCHASE FROM CONRAIL REAL ESTATE DEPARTMENT	\$	5,000.00	\$	2,396.90
ASSOCIATED COSTS/DEED RECORDING ETC.	\$	164.50	\$	78.85
STAFF IN-KIND	\$	19,838.64	\$	6,215.51
Snow Shoe Feasibility Study	9.3 miles	\$ 865.00		
Snow Shoe Design Safety Repairs	\$ 1,701.40	\$ 1,164.15		
Snow Shoe Small Bridge Repairs	\$10,465.90	\$ 4,186.36		
Gillentown Trail Head	\$ 2,671.34	\$		
HISTORICAL REVIEW	\$	5,500.00	\$	5,500.00
OTHER IN-KIND	\$	38,756.43	\$	9,534.00
Snow Shoe Small Bridge Repair				
Snow Shoe Rails to Trails Group				
Quehanna Boot Camp				
TOTAL PRIVATE ENDEAVORS	\$	69,259.57	\$	23,725.26

IN-KIND

MANAGEMENT--DEVELOPMENT--OVERHEAD

			9.3 Miles
LIABILITY INSURANCE	\$	9,755.68	\$ 4,672.97
NOVEMBER 1995 THROUGH SEPTEMBER 2008			
AUDIT COSTS AND 990 PREPARATION	\$	2,630.00	\$ 1,259.77
1995 THROUGH 2007			
GILLETOWN SURVEY	\$	4,692.84	\$ -
VOLUNTEER INSURANCE, LEGAL FEES AND MILEAGE	\$	2,213.79	\$ 1,942.47 *
1995 THROUGH MARCH 25, 2005			
LEGAL FEES	\$	5,135.44	\$ 5,135.44
MARCH 26, 2005 THROUGH AUGUST 31, 2008			
STAFF HOURS NOT REIMBURSED ON GRANTS OR USED AS IN-KIND THROUGH MARCH 25, 2005	\$	14,471.19	\$ 10,535.41 *
MARCH 25, 2005 THROUGH SEPTEMBER 30, 2008			
	\$	3,695.68	\$ 3,695.68
TOTAL MANAGEMENT, DEVELOPMENT & OVERHEAD	\$	42,594.62	\$ 27,241.74

TOTAL EXPENDITURES

		9.3 Miles
SNOW SHOE PUBLIC GRANT OBLIGATIONS	\$ 910,995.00	\$ 653,520.76
PRIVATE ENDEAVORS----IN-KIND	\$ 69,259.57	\$ 23,725.26
MANAGEMENT, DEVELOPMENT AND OVERHEAD	\$ 42,594.62	\$ 27,241.74
GRAND TOTAL	\$ 1,022,849.19	\$ 704,487.76

Updated to September 30, 2008

For Verification or Clarification

on these figures, please contact

Pamela Vota
814-375-1372 ext. 4

THE TRUST RECENTLY SUBMITTED THREE GRANT APPLICATIONS FOR THIS AREA.

PA DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES	VIADUCT SAFETY CONCERNS	\$	109,402.00
PA DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES	MANAGEMENT PLAN TRUST PROPERTY ADJACENT TO THE RAIL TRAIL	\$	109,800.00
CENTRE COUNTY COMMUNITY FOUNDATION	VIADUCT BRIDGE INSPECTION	\$	8,000.00 **
		\$	227,202.00

**THIS GRANT WAS TENTATIVELY APPROVED FOR \$2,000