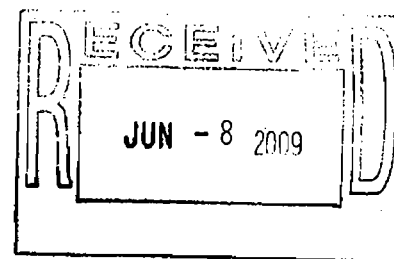




EI-17779



May 29, 2009

Ms. Sandy Basehore, serving as Surface Transportation Board, Office of Economics,  
Environmental Analysis and Administration, Section of Environmental Analysis' Independent  
Third Party Consultant  
Finance Docket No. 35116, RJ Corman Railroad Co., Beech Creek Branch Line – Construction  
and Operation – Between Wallacetown and Gorton, Pennsylvania; Alternative Route Evaluation

MS SANDY BASEHORE  
SKELLY AND LOY INC  
2601 NORTH FRONT STREET  
HARRISBURG PA 17110

Dear Ms. Basehore:

This is in response to your letter of May 6, 2009 concerning the R.J. Corman Railroad Company reactivation of the former Beech Creek Rail Line from Wallacetown to Gorton, PA and the new alternative that has been developed as a result of the public scoping process for the Environmental Impact Statement (EIS). The enclosure of your letter states that you are interested in information regarding potential environmental impacts associated with the new alternative, as well as identifying any resources that may be affected, including any permits and approvals that may be required.

In Pennsylvania, the Public Utility Commission (PUC) takes authority in the locations of railroad/highway crossings, both at-grade and over/under. In previous discussions with the PUC Rail Safety Manager, it was mentioned that appropriate applications would be required to activate the highway/rail grade crossings. The reactivation of the new alternative would establish a minimum of 3 public at-grade crossings. Of these at-grade crossings, one would cross a Minor Arterial Highway with current AADT of 6,973 and a 5% Truck Count; one would cross a local class State Route with current AADT of 7,120 and a 9% Truck Count; and the other at-grade crossing appears to be on a local road. Diagnostic analysis for each public crossing will have to be conducted to evaluate field conditions and types of protections required, which can range from advance warning signs, pavement markings and crossbucks including the possibility of flashing lights and gate systems. At-grade crossing surface types will also have to be designed and accounted for at each location.

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Preliminary investigations may have indicated that this alternative would avoid and minimize many of the socioeconomic and public safety concerns associated with the original Wallacetown to Munson route however the following general comments apply directly toward the Environmental Impact Statement:

- The proposed alternative between Graham Station and Munson/Casanova would be located almost entirely within floodplains, floodways and significant wetlands associated with Laurel Run, Moshannon Creek and their tributaries. The original proposed alternative would avoid these resources and the significant regulatory permitting processes/mitigation requirements for such a location.
- Many of the tributaries, floodplains, floodways and wetlands along this segment have been impacted by the presence of Acid Mine Drainage and associated deep mine subsidence/stability concerns.
- The majority of this segment has been dismantled, bridges removed, grades breached, drainage structures obstructed/non functional likely requiring complete reconstruction/elevation of the grade.
- Many portions of this segment are subject to frequent flooding and the rail grade is frequently inundated/saturated by elevated flows in the surrounding streams and wetlands.
- Significant private property impacts through existing wetlands would be required between Graham Station and the S. R. 0053/Ninth Street Intersection. Additional private property impacts include bisecting properties and possibly creating hardships/access concerns for adjacent residents along the entire alternative route. There are also discussions of property ownership. The rail line property may have been abandoned, sold and deeded to various purchasers.
- As with any active or abandoned rail corridor, the presence of hazardous/residual waste materials could impact any proposed alternative.
- As with any active or abandoned rail corridor, historic rail transportation-related resources and features could be present along the corridor.
- Highway Occupancy Permitting may be required at many locations where the new alternative and existing driveways encroach the State Highway System, jointly. This could result in driveway reconstruction with all of the above mentioned environmental interests applying to each location.

In completing an EA or an EIS, R.J. Corman would be required to address each of the environmental subject areas, including these mentioned and all others. This proposed alternative suggests a more intensive environmental effort than the original.

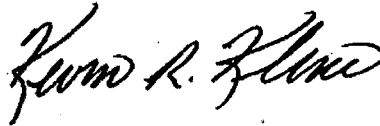
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The Pennsylvania Department of Transportation, Engineering District 2-0, appreciates  
the opportunity to respond to this subject and looks forward to participation in future planning  
efforts related to the potential reactivation of the former Beech Creek rail Line.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin R. Kline". The signature is fluid and cursive, with the first name "Kevin" being more prominent than the last name "Kline".

Kevin R. Kline, P.E.  
District Executive  
Engineering District 2-0