

OPPENHEIMER

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October 19, 2007

Honorable Chairman Charles D. "Chip" Nottingham
Surface Transportation Board
395 E Street SW
Washington D.C. 20423-0001

Honorable Vernon A. Williams
Secretary
Surface Transportation Board
395 E Street SW
Washington D.C. 20423-0001

Re: Finance Docket No. 35081 – *Canadian Pacific Railway, et al – Control – Dakota, Minnesota & Eastern Railroad Corp., et al*

Request to Reconsider Prior Decision Denying Mitigation to City of Winona

Dear Chairman Nottingham and Secretary Williams:

I am writing on behalf of my client, the City of Winona, Minnesota, to request that the Surface Transportation Board reconsider its prior decision that mitigation should not be imposed on behalf of Winona in connection with the Dakota Minnesota & Eastern Railroad Corporation's ("DM&E") Powder River Basin Expansion Project. Relief was previously denied because the rail line in Winona is owned by Canadian Pacific Railway Company ("CP Rail") rather than by DM&E. Now that CP Rail has filed an application to acquire DM&E, the Surface Transportation Board will have jurisdiction to impose mitigation on the impacted rail line in Winona. Moreover, the Surface Transportation Board now has an obligation, pursuant to the National Environmental Policy Act, 42 U.S.C. § 4321, et seq., to examine the environmental impacts caused by Powder River Basin coal trains traveling on the CP Rail lines in Winona, Minnesota.

For the past ten years, the City of Winona has been concerned about the impact that the Powder River Basin Expansion Project will have on the City of Winona. The City of Winona participated in the Surface Transportation Board's proceedings related to the DM&E's Powder River Basin Expansion Project (Finance Docket No. 33407) and the DM&E's acquisition of I&M Rail Link (Finance Docket No. 34177) in an attempt to have its concerns

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addressed by the Surface Transportation Board and to require that a mitigation plan benefiting the City of Winona be imposed as a condition to the Powder River Basin Project. A copy of the Mitigation Plan previously submitted by the City of Winona is attached hereto as Exhibit A.

In denying the City of Winona's past requests for mitigation in relation to DM&E's Powder River Basin Project, the Surface Transportation Board stated:

Winona is not located on the DM&E line. While Winona would experience down-line impacts if DM&E should interchange coal traffic with the Canadian Pacific Railroad (CP) line, which goes through Winona, we cannot require DM&E to take action on property it does not own. Nor can we impose requirements on CP, which is not before us in this proceeding. Therefore, while potential project-related impacts on Winona have been analyzed in the EIS, no mitigation for Winona will be imposed.

See Decision Giving Final Approval to DM&E for PRB Expansion, page 27 (January 30, 2002).

On October 5, 2007, CP Rail filed an Application for Approval of Control of Dakota, Minnesota and Eastern Railroad Corporation, et al, Finance Docket No. 35081. Throughout its application, CP Rail references the Powder River Basin Expansion Project and its intent to pursue the project.

CP Rail "will work diligently with DM&E to accomplish these necessary prerequisites to construction of the proposed PRB line." See October 5, 2007 Application by CP Rail, at page 3.

"[T]he proposed transaction presents a unique opportunity for CPR to assist DME in pursuing its goal of constructing and operating a rail route to serve the Powder River Basin." See October 5, 2007 Application by CP Rail, at page 10.

"CPR's greater financial capability, its demonstrated expertise in designing and constructing new rail lines, and its extensive coal hauling experience will lend credibility to DM&E's ongoing efforts to bring the PRB project to fruition." See October 5, 2007 Application by CP Rail, at page 10.

If CP Rail's acquisition of DM&E is approved, the previous impediments to granting mitigation to the City of Winona, i.e. that the owner of the proposed Powder River Basin line did not own the rail line going through Winona, and that CP Rail was not a party to a Surface Transportation Board proceeding related to the Powder River Basin Project, will no longer exist. Moreover, as CP Rail and DM&E expressly recognize in their application, the Surface Transportation Board has an obligation under the National Environmental Policy Act, 42 U.S.C. § 4321 et seq., "to examine the environmental impacts of the transportation of PRB coal trains over the lines of IC&E and CPR." See October 5, 2007 Application by CP Rail, at

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page 25. Accordingly, the City of Winona respectfully requests that in reviewing CP Rail's Application for Acquisition of DM&E, the Surface Transportation Board reconsider its previous decision denying mitigation to the City of Winona and that it impose mitigation for Winona.

If the Surface Transportation Board is not willing to immediately address the City of Winona's request for mitigation, it requests that the condition proposed by CP Rail and DM&E on page 25 of their Application be adopted by the Surface Transportation Board. That proposed condition states:

Applicants may not transport coal unit trains originating on the new rail line approved for construction in *DME PRB Construction* over lines currently operated by IC&E or CPR¹ until the Board has completed any required review of, and has issued a final decision addressing, the environmental impacts of such coal operations.

If Applicants commence construction of the new rail line approved in *DME PRB Construction*, applicants shall notify the Board that such construction has commenced, and shall submit to the Board such information regarding the volume of PRB coal traffic that Applicants estimate will be transported on the rail lines of IC&E and/or CPR, the destinations of such shipments beyond DM&E's lines as may be required for the Board to conduct any required review of the environmental impacts of such extended coal operations.

See October 5, 2007 Application by CP Rail, at page 25. The City of Winona is aware that the Board previously imposed a condition prohibiting the movement of PRB coal trains over IC&E's lines until an environmental review of the impacts of such Operation was completed and that an Environmental Impact Statement (EIS) would be needed to comply with this condition. See Iowa, Chicago & Eastern RR Corp. – Acquisition and Operation Exemption – Lines of I&M Rail Link, LLC, STB Finance Docket No. 34177 (July 22, 2002)(modified October 17, 2006); Memo to Section Chief Rutson (January 30, 2007). If the City of Winona's mitigation requests are not considered in connection with CP Rail's acquisition of DM&E, it requests that they be included with the required EIS related to the transportation of Powder River Basin coal over former IC&E lines, and as suggested by CP Rail in its application, the transportation of Powder River Basin coal of CP Rail lines.

In conclusion, the City of Winona respectfully requests that the Surface Transportation Board reconsider its previous denial of mitigation to Winona in connection with CP Rail's application to acquire DM&E. CP Rail's acquisition of DM&E, and of the DM&E's Powder River Basin Project, will create a common owner of both the Powder River Basin rail lines and the Winona rail line that will be subjected to substantial increased traffic created by the Powder River Basin line. As an alternative, the City of Winona requests that its proposed

¹ This would include the CP Rail tracks running through the City of Winona.

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mitigation plan be considered as part of the mandated EIS that is required prior to the transportation of coal over former IC&E lines and over CP Rail lines, as suggested by CP Rail in its application to acquire DM&E.

Please let me know if you require additional information in order in connection with the City of Winona's requests for relief and mitigation.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stacey Drentlaw". The signature is fluid and cursive, with the first name "Stacey" written in a larger, more prominent script than the last name "Drentlaw".

Stacey Drentlaw

cc: Judith Bodway
Eric Sorenson

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, I caused to be filed with the Surface Transportation Board the foregoing Request to Reconsider Prior Decision Denying Mitigation to City of Winona and I further certify that I have caused a true and correct copy thereof to be served upon the following via deposit in the United States Mail in Minneapolis, Minnesota, with proper postage paid:

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Robert P. Vom Eigen
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3000 K Street NW, Suit e500
Washington, DC 20008

Counsel for Metra

Exhibit A



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Winona, MN 55987-0378
FAX: 507/457-8212

March 2, 2001

Office of the Secretary
Case Control Unit
STB Finance Docket No. 33407
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

RECEIVED
OCT 03 2007
STACEY L. DRENTLAW

Attention: Elaine K. Kaiser, Chief
Section of Environmental Analysis

The City of Winona is submitting comments to the Surface Transportation Board concerning the Draft Environmental Impact Statement for the Dakota Minnesota and Eastern Railroad Corporation Application, STB Finance Docket No. 33407. The City reserves the right to submit additional comments to the STB and cooperating agencies as the review process continues if significant changes occur that warrant such additional information.

The City of Winona has reviewed the Draft Environmental Impact Statement (DEIS) and is concerned over the lack of direct mitigation requirements imposed for Winona. For the DEIS to be silent on all the impacts that the DM&E expansion project will have on the City of Winona and to be silent on how these impacts will be mitigated and who is responsible for the cost of the mitigation is a fatal flaw and must be addressed and corrected. It is the City's opinion that a full and complete mitigation plan should be part of the final environmental impact statement. The City knows that there will be direct impacts as a result of the Project even though the DM&E does not have track within the city limits. The City will propose mitigation projects that will lessen the impacts the proposed project will have on the City. The STB must require the DM&E be responsible for all mitigation costs.

The DEIS states on page 3.2-32, footnote 6, the "*SEA would not normally evaluate down-line impacts of a construction project on rail line owned and operated by another rail carrier. However, in this case, because SEA determined it appropriate to evaluate*

increases in rail traffic due to the eastward transport of coal all the way to the eastern terminus of DM&E's system because no contracts for coal are in place and no levels of rail interchange can be assumed, SEA recognized that DM&E's coal trains would have to go somewhere once arriving at the eastern end of the system. Based on an evaluation of projected coal markets discussed in the Board's December 10, 1998 decision, SEA determined the majority of coal traffic reaching Winona would interchange with CP for movement south, through Winona. Because it is reasonable that such movement of trains would occur and the citizens and elected officials in Winona expressed concern for noise, air quality, transportation, safety in their community due to this increase in rail traffic, SEA determined it appropriate to consider these potential impacts along the CP rail line in Winona."

Winona is pleased with the finding by the SEA that impacts in Winona will be considered. In light of this decision, Winona will propose mitigation measures that lessen the impacts of the proposed project on the citizens of Winona. The mitigation projects included in this document are to be the responsibility of the DM&E. The STB may require additional mitigation activities that may not be included in this document. The City would support those additional mitigation measures as required in the final EIS.

The City is concerned about such mitigation issues as grade separations, crossing improvements, maintenance of the whistle free corridor, emergency vehicle response delays, residential homes and businesses impacted by the increase in noise and vibration, fencing for pedestrian safety, pedestrian/bicycle crossings, and the funding of such improvements. These issues will be discussed below. The City takes the position that the funding of these mitigation measures must be paid by the DM&E. The City has consistently taken the position that the DM&E railroad existing rail improvements are supported by the City to provide more efficient service to the existing customers. However, the City does not support the expansion to the Powder River Basin unless the negative impacts to Winona are mitigated. The City has taken this position since 1998, and the resolutions the City Council has passed are attached to this document.

The following mitigation measures are those the City of Winona is proposing to the STB be required to be undertaken in Winona if the DM&E project is approved.

CROSSING IMPROVEMENTS

The City has seventeen at grade crossings along the Canadian Pacific main line. The City does not have a grade separation anywhere within the community. The proposed increase of traffic of thirty-four trains per day in a community which has been identified in the DEIS as having an average of twenty-eight trains a day is of immediate concern for public safety and the movement of emergency vehicles. The hospital is located on the south side of the rail line while the ambulance service is located on the north side. The Fire Department has a main fire station staffed with three firefighters on the north side of the tracks while a west station with two firefighters is located south of the tracks. The west station personnel are generally at the main station during the day for training purposes. This means the south side of the community may not be able to be served by emergency medical and fire vehicles if the crossings were blocked in Winona. The

citizens and city administration are concerned over the increase in train traffic and the ability to provide immediate and necessary medical and fire fighting capabilities to all areas of the City.

The following mitigation improvements will help to alleviate the concerns for the citizens of Winona:

Grade Separations

The City has been identified as having seven rail crossings which meet the indicators for a grade separation if the DM&E project is approved (Southern Minnesota Rail Corridor Safety Plan, Minnesota Department of Transportation, February 15, 2000). City topography does not allow for easy construction of grade separations without causing major disruptions within the City. The City is requesting an east and west end overpass along with an additional crossing in the central city with the specific site to be determined. The DM&E shall be responsible for all of the costs related to the three proposed grade separations

Pelzer Street - This street has been identified as the desired west end overpass. Pelzer Street serves as truck route to the west end industrial areas, the Commercial Harbor, and downtown Winona. The area is mostly industrial in nature and will cause limited impact to residential neighborhoods. The cost of this overpass with land acquisition and construction is estimated to be \$5,000,000. A map showing the location and design of this overpass is attached to this document.

Louisa Street - This street is the proposed location of the east end overpass. Louisa Street is located in the east end industrial area and serves the existing industrial users and will serve the new retail development and the expanded Riverbend Industrial Park. The City is proposing a new truck route to Highway 61, which will connect to this overpass. The overpass is also within ten blocks of Community Memorial Hospital. The surrounding area is industrial and will cause the least impact to residential neighborhoods. This overpass is estimated to cost \$2,750,000 for land acquisition and construction. A map showing the location and design of this overpass is attached to this document.

Central City Area - The specific area for a third overpass in the City has not been clearly identified. The City and the Minnesota Department of Transportation are conducting a Comprehensive Railroad Study, which will assess location of a third overpass within the City. The construction of an overpass must not destroy established neighborhoods. It is estimated that this overpass could cost as much as \$7,500,000 for land acquisition and construction. More specific information will be part of the comprehensive railroad study to be completed in 2001.

Pedestrian/Bicycle

The City of Winona sees the importance of having pedestrian/bicycle overpasses in the central city area. The City would propose three such overpasses, two in the area of Winona State University on Huff Street and Main Street and at Franklin Street. There are over 7,000 students located on this small urban campus. The campus is located on

both sides of the rail line with the main buildings on the north and the athletic fields and a commercial area on the south. In addition, Lake Winona, which is a year round recreational facility, including a bike and running trail, is on the south side of the tracks. There is significant pedestrian traffic crossing the tracks at Huff Street, which is a crossing, protected with signals and cross arms. College students live and park on both sides of the railroad while attending WSU. This then encourages crossing of the tracks by numerous pedestrians, especially during the school year. As traffic increases on this rail line, there is the potential for more delays, inconvenience, and accidents to occur between pedestrians and trains.

To assure the safe passage of pedestrians and bicycles, a pedestrian/bicycle overpass should be constructed at Huff Street and at Main Street. These two overpasses would serve Winona State University and the general public in crossing the rail lines at very busy pedestrian areas. The Franklin Street crossing is an area that serves the east central area of the City and is a direct link to Lake Park and the softball complex in the Park. In addition, the Winona State Foundation will be constructing a 300 bed housing facility for college students adjacent to this intersection and the railroad track. Students will need to cross the rail line from the south side to the north side to access the main campus putting increased traffic at this major rail crossing. These facilities are estimated to cost \$4,500,000 and must be paid for by the DM&E.

TRAIN LOCATION MONITORING SYSTEM

The DEIS recommends a real time train location monitoring system for some communities. The City of Winona is requesting such a system. The real time train location monitoring system, which connects grade crossing warning devices to nearby traffic signals and provides a display in the local emergency response center sharing the position of the grade crossing warning signals, shall be required for Winona. With the situation of emergency vehicles being on one side of the rail tracks that divide the whole city, such a system could be used by medical and fire emergency vehicles for the most efficient way to respond to the emergency calls. Eventually this system could be located in the emergency vehicles as they respond to the emergency calls. This would improve the citizens concern over trains blocking the ability of police, fire, and medical vehicles responding to emergencies.

Winona is requesting this system be installed in Winona and Goodview and that the cost of such a system be borne by the DM&E.

WHISTLE FREE CORRIDOR/CROSSINGS IMPROVEMENTS

Winona has seventeen at grade crossings on a rail line that bisects the whole community from west to east on a diagonal. A significant amount of the developed community is located in the valley and close to this rail line. The City currently has a local ordinance that prohibits whistle blowing in the city limits. All seventeen crossings have signals and cross arms but will not meet the increased requirements for a whistle free corridor if the Federal Transportation Board enacts new standards.

The City is requesting that all crossings be improved to assure that the new whistle free requirements will be met at all the crossings. The City is assuming this improvement

will be needed for fifteen at grade crossings that will remain after two overpasses are constructed. The improvements should be four quadrant gates including those for pedestrians. It is estimated that these improvements would cost \$1,875,000. The City further requests that the DM&E fund the improvements.

NOISE AND VIBRATION

The City of Winona has the dubious distinction of having the largest number of noise sensitive receptors as identified in the DEIS in Tables 3.2-13 and 3.2-14.

Table 3.2-13 Existing and Projected Train Traffic - Winona* Number of Noise Sensitive Receptors - 65 dBA L_{dn}				
Winona	Wayside	Wayside/Horn	Horn	Total
28 trains per day - existing	8	857	2,889	3,754
34 trains per day - projected (20MNT)	8	981	2,935	3,924
42 trains per day - projected (50MNT)	14	1,204	2,944	4,162
54 trains per day - projected (100MNT)	14	1,296	3,846	5,156
*Includes 28 existing trains per day operated by Canadian Pacific Railway (CP) trains through Winona.				

Table 3.2-14 Existing and Projected Train Traffic - Winona* Number of Noise Sensitive Receptors - 70 dBA L_{dn}				
Winona	Wayside	Wayside/Horn	Horn	Total
28 trains per day - existing	0	355	1,948	2,303
34 trains per day - projected (20MNT)	1	396	2,098	2,495
42 trains per day - projected (50MNT)	2	564	2,131	2,697
54 trains per day - projected (100MNT)	8	749	2,894	3,651
*Includes 28 existing trains per day operated by Canadian Pacific Railway (CP) trains through Winona.				

The table shows the significant impact train noise has on the community. No other community in the State of Minnesota has the number of noise receptors that Winona has and will have with the increased rail traffic as proposed by the DM&E Project. The City is concerned that there be increased noise and vibration as a result of the project.

While the existing rail has a significant impact, the citizens and affected property owners should not have to have any additional noise and vibration related to the potential of an additional thirty-four trains per day.

The City requests that the DM&E be responsible for improvements to homes most severely impacted by the increase in rail traffic. According to the tables above, there are fourteen homes that are severely impacted by noise. These same homes would be those most severely impacted by vibration issues. While the City does not want to lose residential units, the best solution is to acquire, relocate, and demolish these fourteen homes. This action will result in a reduction in the number of structures impacted by noise and vibration and will take care of those most directly impacted by this project. The City estimates acquisition, at fair market value, of fourteen residential units along the rail line at \$1,050,000. Relocation costs would be \$350,000 and demolition \$200,000. The DM&E must be required to pay for these costs to assure those properties with the most severe impacts be protected from the increased noise. The total cost for the fourteen properties is \$1,600,000.

Another area of concern is for structures impacted by vibration. Again, the magnitude of the problem in Winona is greater than any other community along the rail line in Minnesota. The City would propose that mitigation be required to assure that no additional vibration is caused by the increase of rail traffic. The following excerpt is from a table in the DEIS:

Table 3.2-21 Existing Rail Line –Minnesota Structures Potentially Impacted by Vibration				
	0-100 Feet	101-200 Feet	201-400 Feet	Total
Winona	121	217	498	836

The City is very concerned about the vibration impact 34 additional trains will have on these structures. The DEIS states that ground vibration is a concern for several reasons. These include:

- Structural damage to buildings and residences
- Concern for structural damage
- Nuisance or inconvenience
- Affects on sensitive equipment

Public meetings on this project have confirmed that citizens along the rail line are also concerned about the damage to their structures and more are concerned about the potential for damage. Mitigation procedures should be undertaken to assure that

additional damage does not occur and eliminates some of the concern that such damage might occur. The closeness of the homes may limit the type of vibration mitigation which may be possible. The acquisition of the fourteen structures, most impacted by noise and vibration, will help to meet this mitigation need.

There are still a significant number of homes impacted by vibration and, of course, noise. At the very least, those homes within one hundred feet of the rail line should receive monies to protect their structure from the increased impacts of the rail traffic. The money should be used to super insulate the homes and to improve foundations which have structural problems with the increase in rail traffic. The City estimates the cost for improvements to one hundred homes within one hundred feet of the tracks to be \$2,000,000. The DM&E should pay for this cost.

The City of Winona is also concerned with the 217 structures which have been identified as being within 101 to 200 feet. The City proposes each house be improved to provide increased protection from the increased vibration caused by the coal project. The City would propose improvements of \$5,000 per structure for a total cost of \$1,085,000. The DM&E shall be required to pay for this cost.

There may be vibration mitigation devices that could be built along the rail line to lessen the vibration impact to the surrounding structures. This may be an option for the mitigation for vibration. The STB should require the DM&E to investigate and build any appropriate vibration mitigation devices that would solve the increased vibration issue especially for those properties within 100 feet of the railroad. These vibration devices would keep any increased vibration within acceptable limits.

Sound barriers may be appropriate in certain areas along the rail line adjacent to residential homes or businesses impacted by the increased sound. The installation of the sound barriers would be only in areas where the barriers will not disturb the surrounding residential or business areas but provide appropriate relief from the increased sound. These sound barriers would be coordinated with the mitigation requested in the following safety area. The sound barriers are estimated to cost \$600,000. The DM&E shall be responsible for this cost.

SAFETY

The City proposes the construction of fencing along the rail line in the residential neighborhoods. The citizens have expressed their concerns about the increase in rail traffic and children who live along the rail line. The City agrees with this concern about the safety of children and others along the rail line. The best way to assure that children are kept away from the rail line is to put fencing along the line in the residential areas to discourage access to the rail line except at marked crossings. This fencing could be solid in those areas, where appropriate, and open in other areas. The City further requests landscaping be added to the fencing at locations that would allow such to occur. This fencing and landscaping could be designed to provide mitigation from the noise and vibration issues discussed above. The property proposed to be acquired, earlier in the report, could be locations for significant landscaping for sound and vibration protection for the surrounding properties.

The City estimates the cost of this fencing at \$750,000 with landscaping at \$1,000,000. The DM&E shall pay the full cost of this safety fencing and landscaping to provide safety and sound/vibration barriers.

AIR QUALITY

The City of Winona is concerned about the increase in air pollution as a result of the increased rail traffic. The City wants to be assured that all railroad equipment, including all diesel engines operated by the DM&E, meet all federal and state air quality standards. The transporting of coal through the City must also meet any federal or state regulations on air emissions. The STB shall require that the DM&E operations meet any changes in air quality standards. The DM&E must also be responsible for all costs associated with any ill affects in air quality proven to be a result of the DM&E coal trains traveling through the City of Winona.

BARGE LOADING IN THE COMMERCIAL HARBOR

The City has had discussions with the DM&E about the possibility of transloading coal to barges in the Winona Commercial Harbor. The DM&E has stated that the majority of the coal shipments will interchange with other rail carriers or be loaded on to barges in Winona. The increase in barge loadings for coal would significantly tax the current infrastructure in the Commercial Harbor. This increase in shipping coal from train and transloading to barge will require additional rail access to the Commercial Harbor.

The City requests that the DM&E be required to detail any potential new construction of rail into the Commercial Harbor. The STB should require the DM&E to detail all plans for new construction of infrastructure to the Commercial Harbor and the STB should review any such plans as part of the EIS process. The STB should review these plans and identify any mitigation measures which arise as a result of this new infrastructure. We further request that the DM&E pay for any new construction and mitigation for this infrastructure to the harbor area.

SUMMARY

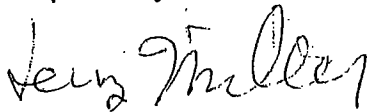
The City of Winona is the eastern termination of the DM&E Railroad. As such, the City receives all traffic from the DM&E as it is transferred to the Canadian Pacific or Union Pacific Railroads. The current level of operation is important to Winona businesses and to the transloading of agricultural commodities to barges on the Mississippi River. Winona requests the STB require the DM&E to continue service to existing customers at or above current service levels and at rates that are fair and reasonable. This continued service is critical to the future of our current business community and must not be reduced or made noncompetitive as a result of the coal project.

It is possible that in the future the Canadian Pacific or other railroad companies located in Winona may decide to construct additional trackage in order to accommodate the added DM&E coal trains and increase their own traffic. If that does happen, the City reserves the right to address the impacts the additional rail volume will have on the City and what has to be done to mitigate those impacts. The City of Winona requests the STB require the DM&E to establish a fund to be used to address impacts which may be

produced by future rail construction in Winona due to the DM&E expansion project for the transport of coal as it affects Winona.

The City of Winona requests that the mitigation proposed in this document be included in the final EIS. The City further requests that the STB order that all costs of mitigation be the sole responsibility of the DM&E railroad.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Jerry Miller".

Mayor Jerry Miller
City of Winona

**CITY OF WINONA
COST ESTIMATE SUMMARY**

Grade separations:

Pelzer Street	\$5,000,000
Louisa Street	\$2,750,000
Central City	\$7,500,000

Pedestrian/Bicycle Overpasses

Huff Street	\$1,500,000
Main Street	\$1,500,000
Franklin Street	\$1,500,000

Crossing improvements

15 crossings	\$1,875,000
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Structural Improvements For Noise and Vibration

Acquisition, Relocation, Demolition	
14 homes	\$1,600,000
Residential 100 feet -100 homes	\$2,000,000
Residential 200 feet -217 homes	\$1,085,000
Sound barriers	\$ 600,000

Safety

Fencing and Landscaping	\$1,750,000
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Signal System	NA
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Air Quality	NA
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Rail access to Commercial Harbor	NA
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TOTAL	\$28,660,000
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The STB is requested to make the DM&E responsible for any cost of living increase in the cost of the mitigation projects.

Pelzer Street Railroad Overpass



500 0 500 1000 Feet

Louisa Street Railroad Overpass



300 0 300 600 Feet





East Section



400' rail offset



200' rail offset



100' rail offset

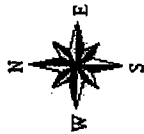
Railroad

500

0

500

1000 Feet



West Section

400' rail offset

200' rail offset

100' rail offset

Railroad

0

500

1000 Feet

