CHAPTER 2
PROPOSED ACTION AND ALTERNATIVES

This chapter describes the Proposed Action and outlines the alternatives that OEA has studied throughout the environmental review process. In this chapter, OEA has updated the information presented in Chapter 2, Proposed Action and Alternatives, of the DEIS to reflect RJCP's potential transport of ethanol over the proposed rail line and the status of the Black Rock Road alternative, where appropriate. This chapter also identifies OEA's recommendation for the environmentally preferable alternative.

2.1 ALTERNATIVES

As discussed in the DEIS, NEPA regulations require federal agencies to consider a reasonable range of feasible alternatives to the Proposed Action. However, NEPA does not mandate consideration of every conceivable variation of an alternative.[1] In this context, OEA decided early on that the analysis of "off-line" or "new location" build alternatives (i.e., totally new rail line in new location) would not be reasonable for this project. Given the scope of RJCP's Proposed Action (i.e., construction within an existing rail right-of-way and reactivation of rail service over an existing graded roadbed), the analysis of more costly, off-line/new location build alternatives would be more environmentally damaging because the existing rail right-of-way would not be used. For comparison purposes, construction of a new 20-mile "off-line" railroad alternative having a 66-foot wide right-of-way would impact a minimum 160 acres of varied land uses. These varied land uses would likely include a diverse and scattered mixture of undeveloped (i.e., forestland, old field/herbaceous upland, and wetland) and developed (i.e., residential and commercial) parcels pending the exact location of the alternative. This 160-acre impact estimate does not account for the relatively flat grades (i.e., generally less than 2%) required for new railroad track construction and operation. Achieving this maximum grade in the rolling/mountainous terrain of Clearfield and Centre Counties would likely result in even greater acreage impacts due to new cuts/fills and/or the potential need for switchbacks along the rail line. Any "off-line" alternative would have a greater potential to impact threatened and endangered species, historic properties, and community facilities. Residential relocations and the introduction of multiple new grade crossings of state and local roadways where none existed previously would also be unavoidable.

Thus, the DEIS focused on the Proposed Action, an alternative to the Proposed Action (known as the Modified Proposed Action), three no-build alternatives, and the no-action alternative. These alternatives are further summarized below:

- **Build Alternative (Proposed Action)** – The Proposed Action is presented in RJCP's petition for exemption filed with the Board and consists of the originally proposed Eastern Segment and Western Segment. The Proposed Action's Western Segment would follow the Wallaceton to Munson Route and then continue east to Winburne. If the Proposed Action is authorized by the Board, R.J. Corman Railroad Group's own construction crew would construct the proposed rail line. RJCP estimates that construction of the Proposed Action would take approximately 12 to 18 months to complete. The line

[1] See CEQ Forty Questions, Question 1.

would be constructed on a 66-foot right-of-way owned/controlled or to be owned/controlled by RJCP.

- **Build Alternative (Modified Proposed Action)** – The Modified Proposed Action consists of the same Eastern Segment, but the Modified Proposed Action's Western Segment would follow the Alternate Route from Philipsburg to Munson and then continue east to Winburne. Construction activities for the Modified Proposed Action would be the same as the Proposed Action, and there would be no change in the width of the right-of-way or ownership. RJCP has identified this alternative as its preferred alignment.

- **No-Build Alternative (I-80 Interchange)** – The I-80 Interchange involves no physical rail improvements. Under this alternative, the construction of a new interchange on Interstate 80 would be used to provide direct vehicular access to RRLLC's proposed waste-to-ethanol facility/development site and to other interested shippers. This alternative was not advanced for detailed analysis in the DEIS because FHWA had not (and to date still has not) granted approval of the new interchange.

- **No-Build Alternative (Local Road System Upgrade)** – Much like the I-80 Interchange, the Local Road System Upgrade alternative involves no physical rail improvements. Rather, under this alternative the existing local road system would be improved to accommodate the anticipated volume of truck traffic that would be generated by RRLLC's proposed waste-to-ethanol facility/development site and other shippers located in the project area.

- **No-Build Alternative (Black Rock Road)** – A variation on the Local Road System Upgrade alternative, the Black Rock Road alternative involves no physical rail improvements. Rather, under this alterative the existing local road system would be improved and a new access road would be constructed to accommodate the anticipated volume of truck traffic generated by RRLLC's proposed waste-to-ethanol facility/development site and the traffic of other area shippers. This alternative was not advanced for detailed analysis in the DEIS because when the DEIS was prepared, RRLLC's subdivision plan had not been approved by the Centre County Planning and Community Development Office. As discussed below, this alternative has been carried forward for detailed analysis in this SDEIS because RRLLC has since received the necessary County approval to implement the Black Rock Road No-Build Alternative.

- **No-Action Alternative** – This alternative involves retaining the status quo and taking no action, rail or otherwise. Under this alternative, RJCP would not provide rail service to RRLLC's proposed waste-to-ethanol facility/development site (or to any of the other interested shippers located along the proposed line), nor would the improvements needed to provide an acceptable means of vehicular access be undertaken. In short, this alternative would result in no change in access to RRLLC's proposed waste-to-ethanol facility/

development site beyond use of the existing local road system in its current physical condition.

2.2 ALTERNATIVES CONSIDERED AND CARRIED FORWARD IN THE DEIS

This section summarizes the alternatives that were considered and carried forward for detailed analysis in the DEIS. These alternatives were studied in detail as part of OEA's environmental review for this project.

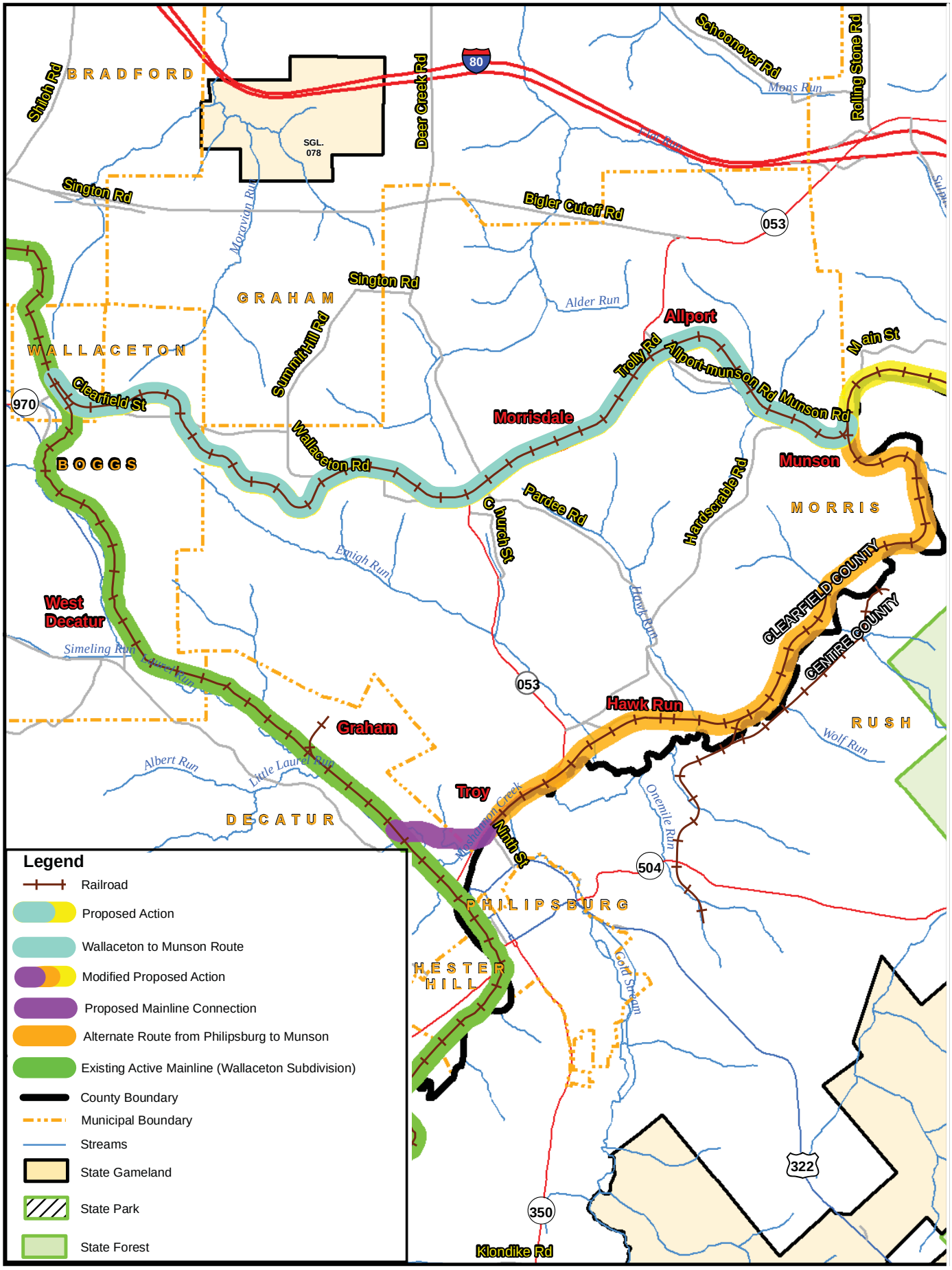
2.2.1 Proposed Action and Modified Proposed Action

The Proposed Action would involve construction and operation over the abandoned Western Segment and reactivation of service over the Eastern Segment. Because a member of the public identified an alternate route for a portion of the Western Segment, OEA has considered an alternative to the Proposed Action (known as the Modified Proposed Action). Both the Proposed Action and the Modified Proposed Action would provide common carrier rail service to RRLLC's proposed waste-to-ethanol facility/development site located near Gorton as well as to several other interested shippers along the line. Figure 2-1 shows the locations of the Proposed Action and the Modified Proposed Action.

The Proposed Action's Western Segment would follow the Wallaceton to Munson Route and would connect to the existing Wallaceton Subdivision Line at Milepost 11.7 (i.e., Beech Creek Branch Line Milepost 75.32)[2] in Wallaceton Borough, Clearfield County. It would then proceed in a generally eastward direction passing through part of Boggs and Morris Townships to the small village of Munson. Along the way, this route would roughly parallel and cross S.R. 2034 (Wallaceton Road), S.R. 0053 (Kylertown-Drifting Highway), S.R. 2032 (Old Turnpike/Allport-Munson Road), and S.R. 2035 (Main Street). In addition to passing through the residentially developed area of Wallaceton Borough, the Wallaceton to Munson Route would also pass through the small residential villages of Morrisdale and Allport before arriving at Munson. From Munson, the remaining portion of the Western Segment would parallel the Moshannon Creek and Sawmill Road (T-707) as it winds north and east through Cooper Township to Winburne, where it then would cross the Moshannon Creek and enter Rush Township, Centre County (i.e., the approximate beginning of the Eastern Segment). In total, the Proposed Action's Western Segment would involve 19 public road crossings, including 9 crossings of numbered state routes, and 13 private driveway crossings. Of these 19 public road crossings, only 2 would be grade-separated. The remaining 17 public road crossings would consist of at-grade intersections. Of the 13 private driveway crossings, only 1 would be grade-separated. The remaining 12 would be at-grade.

The Modified Proposed Action's Western Segment would follow the Alternate Route from Philipsburg to Munson and would entail use of the existing Wallaceton Subdivision Line south of Wallaceton Borough to a point near Philipsburg in Decatur Township where a new 4,000-foot connection would be built to tie into another 5.8-mile abandoned rail line leading northeast to Munson. Located entirely within Morris Township, Clearfield County, this 5.8-mile section

[2] The milepost numbering system for the Proposed Action used throughout this SDEIS refers to the original milepost numbering established for the former Beech Creek Railroad when it stretched 112 miles from Jersey Shore (Milepost 0) in Lycoming County to Mahaffey Junction (Milepost 112) in Clearfield County. The 20-mile section of rail line that this SDEIS addresses is roughly situated between Milepost 75 in Wallaceton and Milepost 55 in Gorton.


BRADFORD
Smith Rd
SGL. 078
Sington Rd
Dear Creek Rd
80
Schoonover Rd
Mons Run
Rolling Stone Rd
Moravian Run
Bigler Cutoff Rd
053
GRAHAM
Sington Rd
Alder Run
WALLACETON
Summit Hill Rd
Allport
Trolly Rd
Allport-munson Rd
Main St
Clearfield St
970
Morrisdale
Munson Rd
Wallaceton Rd
BOGGS
Munson
Church St
Pardee Rd
Hardscrabble Rd
MORRIS
Emigh Run
CLEARFIELD COUNTY
CENTRE COUNTY
West Decatur
Hawk Run
Simeling Run
Graham
053
Hawk Run
RUSH
Wolf Run
Albert Run
Little Laurel Run
Troy
Onemile Run
DECATUR
Ninth St
504
PHILIPSBURG
HESTER HILL
Gold Stream
322
350
Klondike Rd
Legend
Railroad
Proposed Action
Wallaceton to Munson Route
Modified Proposed Action
Proposed Mainline Connection
Alternate Route from Philipsburg to Munson
Existing Active Mainline (Wallaceton Subdivision)
County Boundary
Municipal Boundary
Streams
State Gameland
State Park
State Forest

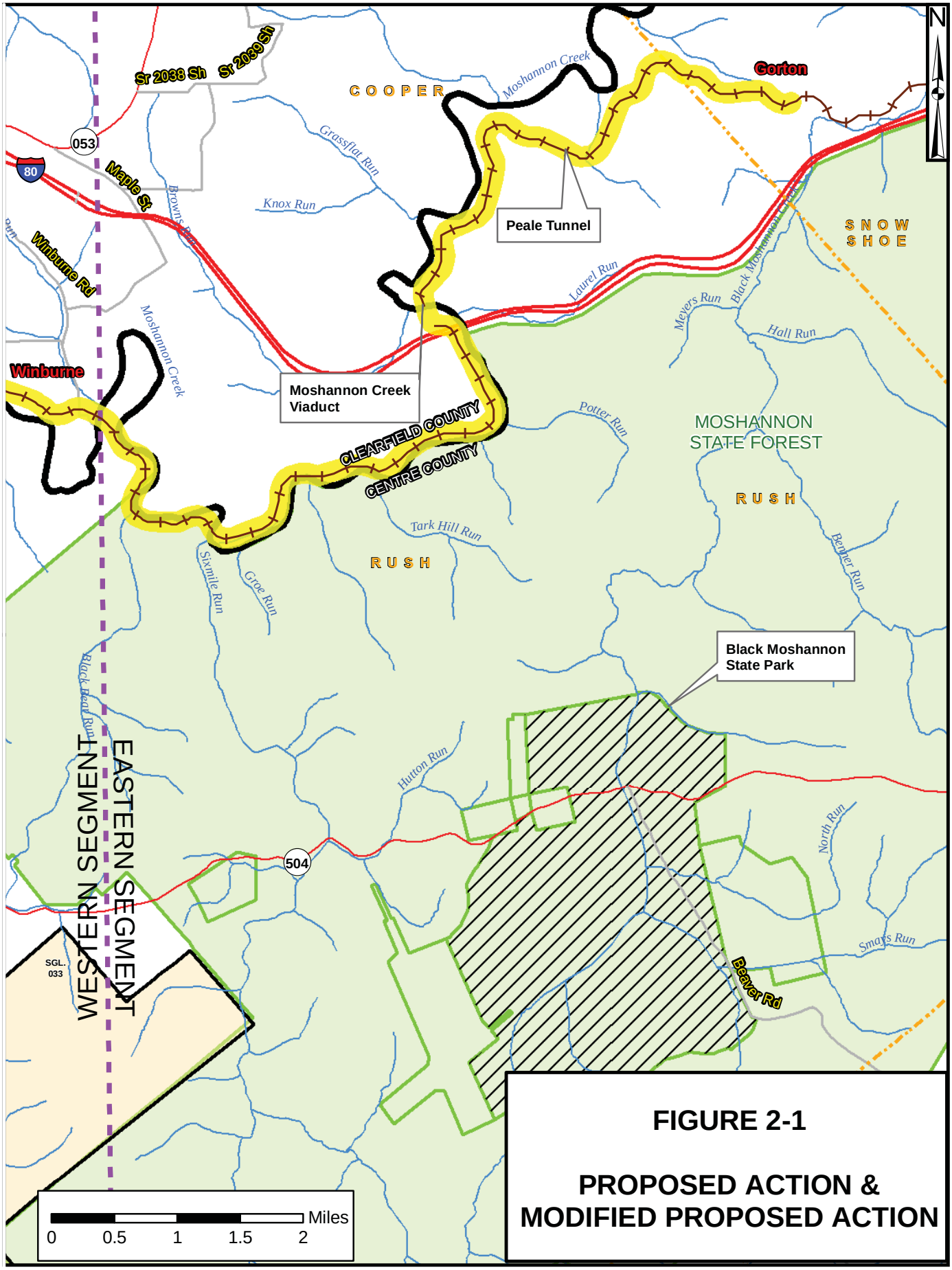


FIGURE 2-1

PROPOSED ACTION & MODIFIED PROPOSED ACTION

of Conrail's former Philipsburg Industrial Track would parallel Moshannon Creek as it winds its way northeast to Munson. This route would pass adjacent to the small residential villages of Troy and Hawk Run. From Hawk Run, the remaining portion of this route would pass adjacent to undeveloped former coal mining areas up to Munson. From Munson east to the Moshannon Creek Bridge Crossing at Winburne, the Modified Proposed Action's Western Segment would be the same as the Proposed Action's Western Segment described above. For comparison purposes, the Modified Proposed Action's Western Segment would be approximately one mile shorter than the Proposed Action's Western Segment and would involve only five public road crossings (four at-grade and one grade-separated) and two private driveway crossings (one at-grade and one grade-separated). Of these five public road crossings, three would occur at numbered state routes while the remaining two would occur at local township roads.

From the Moshannon Creek Bridge Crossing at Milepost 65.21 for both the Proposed Action and the Modified Proposed Action (i.e., the approximate beginning of the rail banked Eastern Segment), the rail line would pass through undeveloped forestland and un-reclaimed strip mine areas. There are no public road or private driveway crossings, nor are there any residential, commercial, or industrial buildings on this part of the proposed right-of-way. There are, however, three bridge crossings and a tunneled section within the Eastern Segment. In addition to the Moshannon Creek Bridge Crossing at Milepost 65.21, these bridge crossings include Black Bear Run at Milepost 64.24, Six-mile Run over Moshannon Creek at Milepost 63.53, and the Moshannon Creek Viaduct at Milepost 59.72. The Peale Tunnel, a 1,277-foot tunnel, is located at Milepost 57.35. Continuing east from the Peale Tunnel, the proposed rail line would cross into Snow Shoe Township before terminating at Gorton Road (T-355) in the general vicinity of Milepost 55. Two other notable features of the Eastern Segment include the presence of the Moshannon State Forest and I-80. An approximate 4,400-foot section of the Eastern Segment from just west of the Black Bear Run Bridge to the Six-mile Run Bridge passes through the northwestern corner of Moshannon State Forest. The Eastern Segment also passes under a large bridge carrying I-80 over the Moshannon Creek from Rush Township, Centre County to Cooper Township, Clearfield County.

Under either alternative, RJCP proposes to construct a single-track line over the approximate 20-mile project length and to operate common carrier service over the 20 miles of line. At peak capacity, RJCP anticipates that it would serve the RRLLC waste-to-ethanol facility/development site and other local shippers with one or at most two trains daily. As discussed in Chapter 3 of this SDEIS, RJCP has stated that any additional cars carrying ethanol would simply be added to the daily train. Therefore, the additional rail cars carrying ethanol would not alter rail operations (expected to be one inbound train and one outbound train each day). Section 2.2.1.1 of the DEIS contains a more detailed description of RJCP's proposed construction activities, and Section 2.2.1.2 contains a more detailed description of RJCP's proposed rail operations.

2.2.2 No-Build Alternative (Local Road System Upgrade)

The Local Road System Upgrade alternative would involve improving the existing local road system to accommodate the anticipated volume of truck traffic generated by RRLLC's proposed waste-to-ethanol facility/development site and interested shippers who would use the rail line if it were available. Figure 2-2 and Table 2-1 illustrate the general location and summarize the extent of roadway improvements associated with the Local Road System Upgrade alternative. Under this alternative, RRLLC would acquire improved access to its proposed waste-to-ethanol facility/

development site, but that access would be provided by way of motor vehicle via improvements to the existing local road system, and not by way of rail. This alternative would require no rail involvement whatsoever. From OEA's perspective, the Local Road System Upgrade alternative is part of the No-Build Alternative because it does not involve building, constructing, reactivating or operating any rail line.

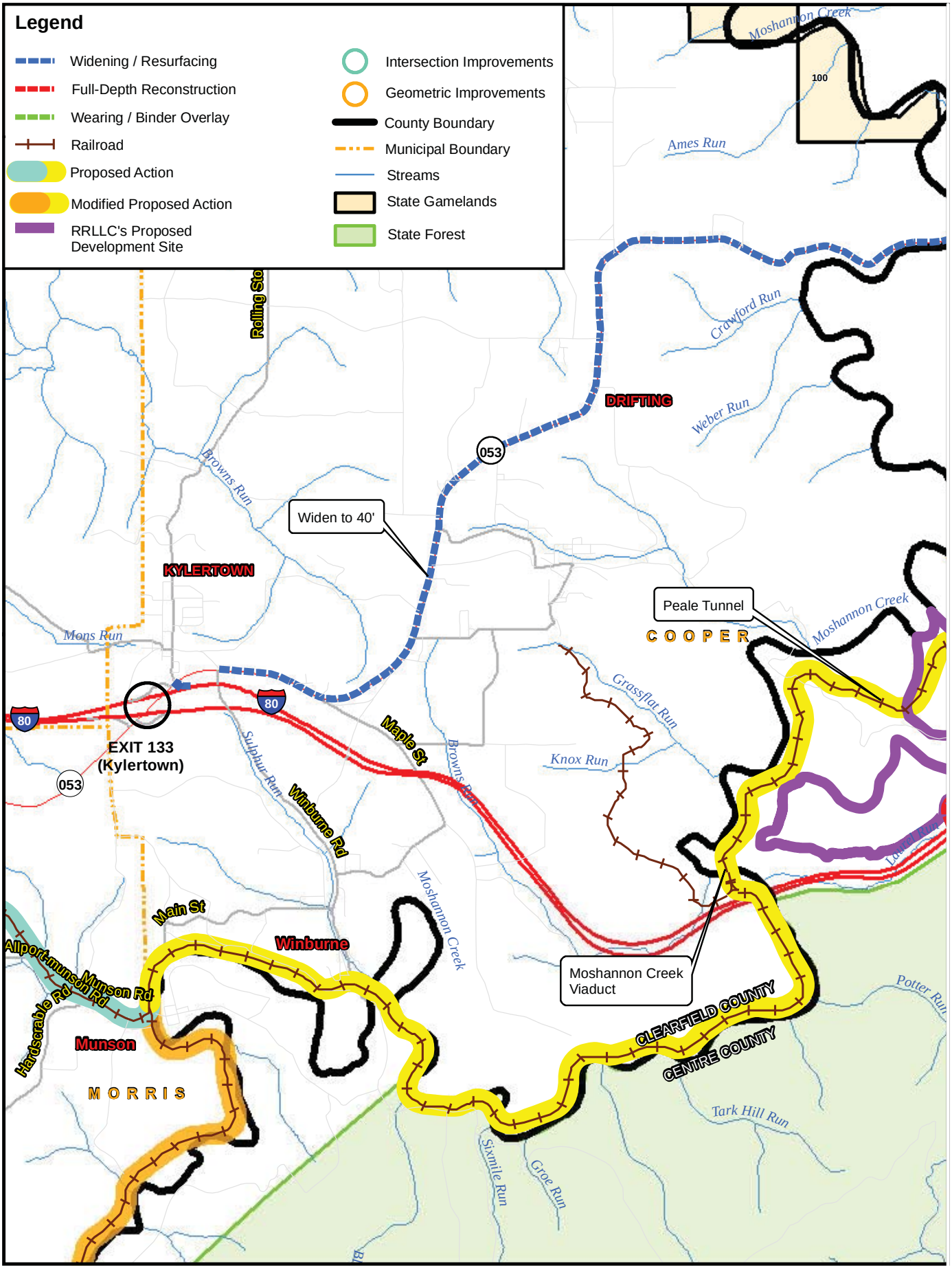
TABLE 2-1
LOCAL ROAD SYSTEM UPGRADE

ROAD/INTERSECTION	PROPOSED IMPROVEMENT
S.R. 0053/S.R. 0144/Gorton Road	• Pavement widening to accommodate turning trucks • Building demolition (two residential structures) in southwest and southeast quadrants
S.R. 0144/S.R. 4005 (Cherry Run Road)	• Signalization (warranted for peak hour volumes) • Widen intersection approaches to provide eastbound right-turn and northbound left-turn lanes
S.R. 0053	• Widen to 40 feet and resurface (two 12-foot lanes and two 8-foot shoulders) from the intersection with S.R. 2037 (Winburne Road) in Kylertown east to the intersection with S.R. 0144 in Moshannon
S.R. 0144	• Widen to 40 feet and resurface (two 12-foot lanes and two 8-foot shoulders) from the S.R. 0053 intersection in Moshannon east to the Cherry Run Road intersection
I-80 Kylertown Interchange Westbound Exit Ramp (Exit 133)	• Lengthen diverge area of ramp (weaving section) by 50 feet
I-80 Snow Shoe Interchange Westbound Exit Ramp (Exit 147)	• Lengthen diverge area of ramp (weaving section) by 150 feet
Gorton Road (Snow Shoe Township)	• Widen to 40 feet (two 12-foot lanes and two 8-foot shoulders) • Full-depth pavement reconstruction or overlay • Widen 90 degree bend to accommodate turning trucks • Replace bridge over Black Moshannon Creek to accommodate heavy vehicles and two-way traffic • Roadway realignment at Snow Shoe Multi-Use Rail Trail crossing
Gorton Road (Rush Township)	• Relocation from the Rush Township/Snow Shoe Township Line to RRLLC's proposed waste-to-ethanol facility/ development site

Section 2.2.2 of the DEIS contains additional information about the Local Road System Upgrade alternative.

2.2.3 No-Action Alternative

In accordance with NEPA regulations, OEA analyzed a No-Action Alternative to serve as a basis for the comparison of impacts to RJCP's Proposed Action. This alternative would involve taking no action, rail or otherwise, but maintaining the status quo. Under the No-Action Alternative, RJCP would not provide rail service to RRLLC's proposed waste-to-ethanol facility/development site (or to any of the other interested shippers along the line), nor would an acceptable means of vehicular


Legend
Widening / Resurfacing
Full-Depth Reconstruction
Wearing / Binder Overlay
Railroad
Proposed Action
Modified Proposed Action
RRLLC's Proposed Development Site
Intersection Improvements
Geometric Improvements
County Boundary
Municipal Boundary
Streams
State Gamelands
State Forest
Moshannon Creek
100
Ames Run
Crawford Run
Weber Run
DRIFTING
053
Browns Run
Widen to 40'
KYLERTOWN
Mons Run
Peale Tunnel
COOPER
Moshannon Creek
Grassflat Run
Knox Run
80
EXIT 133
(Kylertown)
Sulphur Run
Maple St
Winburne Rd
Main St
Winburne
Allport-Munson Rd
Munson Rd
Hardscrable Rd
Munson
MORRIS
Moshannon Creek Viaduct
CLEARFIELD COUNTY
CENTRE COUNTY
Potter Run
Tark Hill Run
Sixmile Run
Groe Run

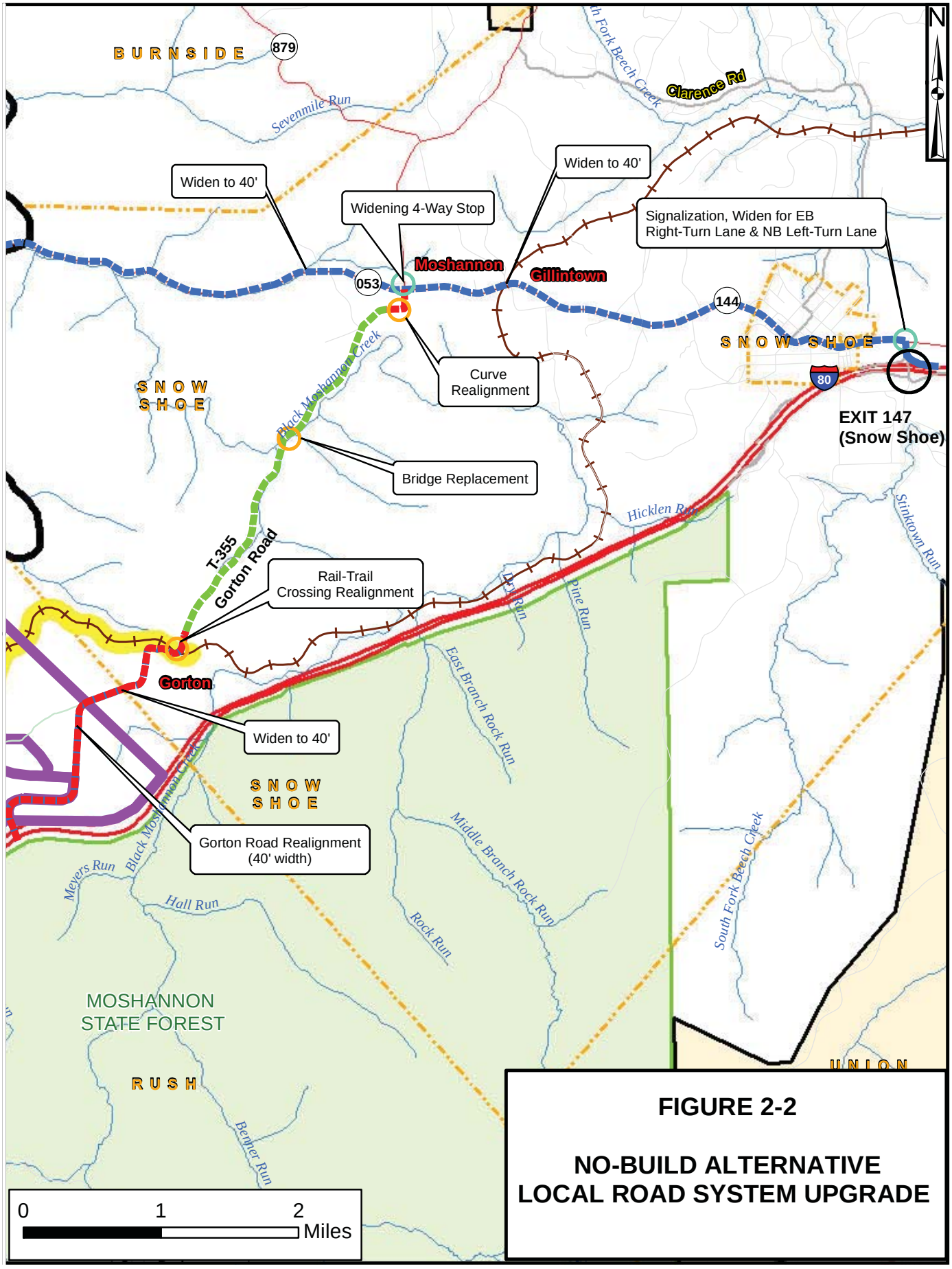


FIGURE 2-2

NO-BUILD ALTERNATIVE
LOCAL ROAD SYSTEM UPGRADE

access be provided. In short, this alternative would result in no change in access to RRLLC's proposed waste-to-ethanol facility/development site beyond use of the existing local road system in its current physical condition.

2.3 ALTERNATIVES CONSIDERED BUT NOT ADVANCED FOR DETAILED ANALYSIS IN THE DEIS

This section summarizes the alternatives that were considered but not carried forward for detailed analysis in the DEIS. These alternatives were not studied in detail as part of OEA's environmental review for this project.

2.3.1 No-Build Alternative (I-80 Interchange)

The I-80 Interchange would involve the construction of a new interchange on Interstate 80 to provide direct vehicular access to RRLLC's proposed waste-to-ethanol facility/development site. Under this alternative, RRLLC would acquire improved access to its proposed waste-to-ethanol facility/development site, but that access would be provided by way of motor vehicle via new interchange/roadway construction, and not by way of rail. This alternative would result in no rail service whatsoever. From OEA's perspective, the I-80 Interchange is considered part of the No-Build Alternative because it does not involve building, reconstructing, reactivating or operating any rail line.

As presented in the DEIS, the Federal Highway Administration (FHWA) did not approve the new interchange, finding that: 1) the Point of Access Study failed to demonstrate that the existing interchanges and/or local roads and streets in the corridor can neither provide the necessary access nor be improved to satisfactorily accommodate the design-year traffic demands while at the same time providing the access intended by the proposal, and 2) the Point of Access Study did not effectively demonstrate that the new interchange proposal is consistent with regional land use and transportation plans. Specifically, FHWA stated that the I-80 Interchange proposal appears to be inconsistent with both the Centre County Comprehensive Plan and the Centre County Metropolitan Planning Organization's (MPO) Long Range Transportation Plan. As a result of this regional land use and transportation planning inconsistency, the Centre County MPO declined to include the I-80 Interchange proposal as part of the Centre County Transportation Improvement Program (TIP). Since the I-80 Interchange was not included as part of the Centre County TIP, the Pennsylvania Department of Transportation (PennDOT) subsequently did not include it as part of the larger statewide TIP. Therefore, the I-80 Interchange proposal is not considered to be part of Pennsylvania's current transportation program. Given FHWA's denial of conceptual approval, and RRLLC's inability to resolve this alternative's regional land use and transportation planning consistency issue with the Centre County MPO, OEA did not consider the I-80 Interchange to be a feasible and reasonable alternative, and thus, did not advance it for more detailed analysis in the DEIS. Section 2.3.1 of the DEIS contains additional information about the I-80 Interchange alternative.

2.3.2 No-Build Alternative - Local Road System Upgrade (Black Rock Road)

OEA also considered a modified version of the Local Road System Upgrade alternative in the DEIS involving the construction of a new access road (Black Rock Road – incorrectly named

Black Bear Road in the DEIS) from S.R. 0053 to Gorton Road. Under this alternative, all of the proposed roadway improvements described above and in the DEIS for the Local Road System Upgrade alternative would apply except for the improvements to Gorton Road. Instead of those improvements, a new access road would be constructed from S.R. 0053 west of Moshannon across Black Moshannon Creek to a new intersection with Gorton Road. This new access road was proposed by RRLLC in June 2009 as part of a larger property subdivision plan. However, OEA did not advance this particular version of the Local Road System Upgrade alternative for further consideration because, at that time, RRLLC's preliminary subdivision plan was denied approval by the Centre County Planning and Community Development Office. Following issuance of the DEIS, OEA learned that RRLLC successfully challenged the Centre County Planning and Community Development Office's disapproval of its preliminary plan. In a court order issued by Judge Bradley P. Lunsford of the Centre County Court of Common Pleas (see Appendix C), RRLLC's preliminary subdivision plan was approved. Because the preliminary plan approval status of Black Rock Road has changed, OEA believes it would be appropriate to carry the Black Rock Road alternative forward for more detailed analysis in this SDEIS.

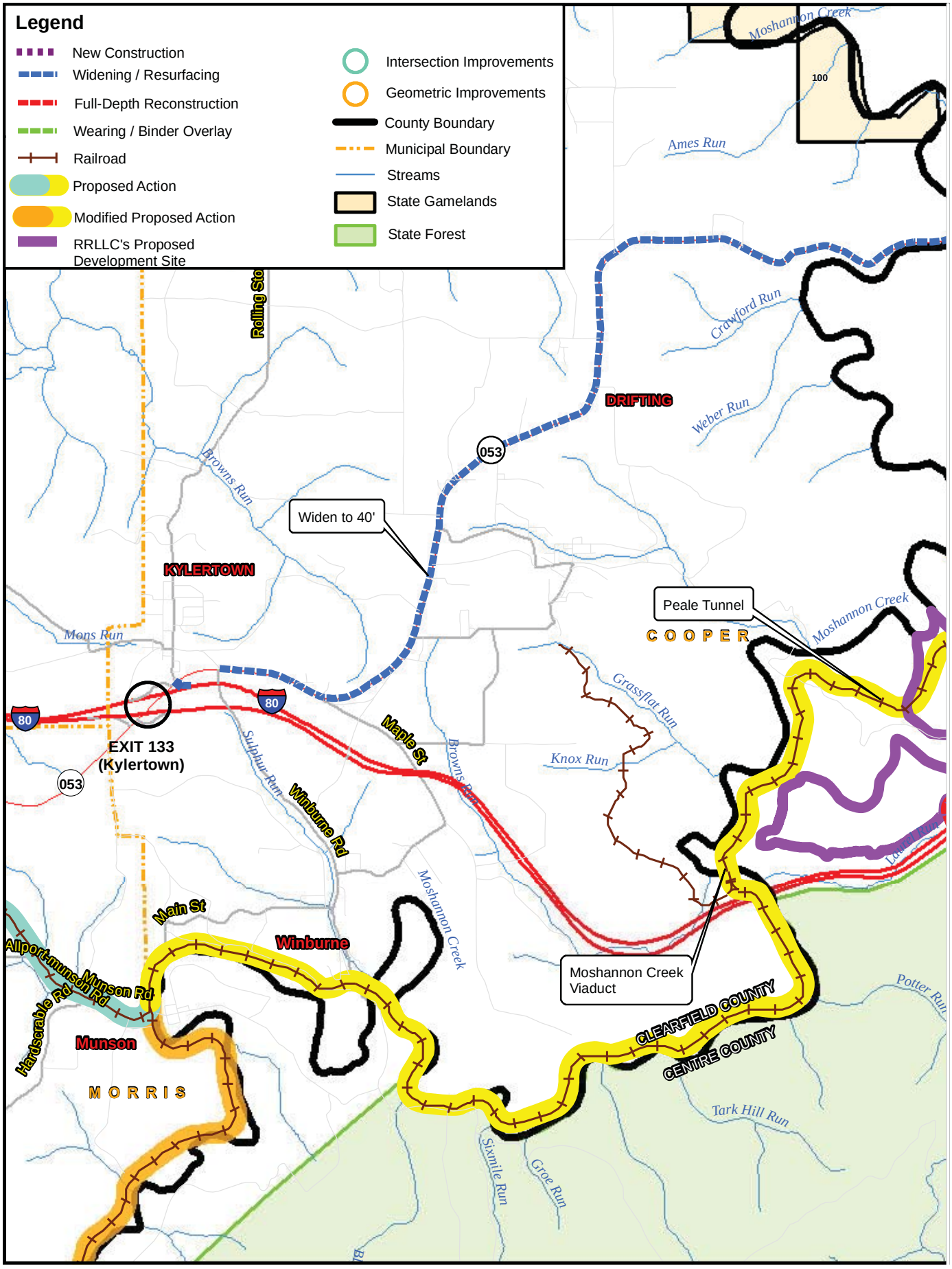
Black Rock Road would intersect S.R. 0053 at a new T-intersection approximately 2.3 miles west of the village of Moshannon. From this new intersection, Black Rock Road would cross over Black Moshannon Creek via a new, two-span bridge and head in a south-southeast direction for approximately 3.1 miles to a new intersection with Gorton Road. Figure 2-3 shows the proposed location of the new access road. Approximately 1.2 miles of this 3.1-mile project length have been designed to tie into the existing gravel road system that exists on RRLLC's property. A typical section of Black Rock Road would consist of two 11-foot travel lanes with 4-foot shoulders, except in curbed sections which would consist of 2-foot shoulders. Guidelines in the Centre County Subdivision and Land Development Ordinance would be used to establish the roadway geometry (i.e., line and grade), as appropriate. Detailed analysis of the environmental impacts associated with this alternative is presented in Chapter 4 of this SDEIS.

2.4 IDENTIFICATION OF THE ENVIRONMENTALLY PREFERABLE ALTERNATIVE

NEPA requires a comparison of the environmental impacts of the Proposed Action and its alternatives, in order to provide a clear basis for the selection of the Preferred Alternative (or Alternatives). Section 2.4 of the DEIS compares the environmental impacts of the various alternatives and includes a table (Table 2.2) summarizing the comparison. In Section 2.4 of the DEIS, OEA concluded that the Modified Proposed Action would be the environmentally preferable build alternative, due to its substantially fewer public road and private driveway crossings and fewer affected residences, and would also be the environmentally preferable alternative for this project. Based on the new information presented in this SDEIS, OEA continues to find that the Modified Proposed Action would be the environmentally preferable alternative.

In Chapter 3 of this SDEIS, OEA explained that, although highly unlikely on either build alternative,[3] a train accident resulting in a release of ethanol on the Proposed Action's Western Segment would generally be more significant than a train accident resulting in a release of ethanol

[3] OEA calculated a 0.0007 (0.07%) annual probability of occurrence for a mainline train accident resulting in a release of hazardous materials on the proposed rail line. This annual probability of occurrence would equal an estimated return year interval (an estimate of time between accidents) of one accident resulting in a release of hazardous materials every 1,428 years. See Chapter 3 of this SDEIS.


Legend
New Construction
Widening / Resurfacing
Full-Depth Reconstruction
Wearing / Binder Overlay
Railroad
Proposed Action
Modified Proposed Action
RRLLC's Proposed Development Site
Intersection Improvements
Geometric Improvements
County Boundary
Municipal Boundary
Streams
State Gamelands
State Forest
Moshannon Creek
100
Ames Run
Rolling Stone
Crawford Run
DRIFTING
Weber Run
053
Browns Run
Widen to 40'
KYLERTOWN
Peale Tunnel
COOPER
Moshannon Creek
Mons Run
Grassflat Run
80
EXIT 133
(Kylertown)
Maple St
Knox Run
Sulphur Run
Winburne Rd
Browns Run
Main St
Moshannon Creek
Winburne
Allport
Munson Rd
Hardscrable Rd
Moshannon Creek Viaduct
Potter Run
CLEARFIELD COUNTY
CENTRE COUNTY
Munson
MORRIS
Tark Hill Run
Sixmile Run
Groe Run

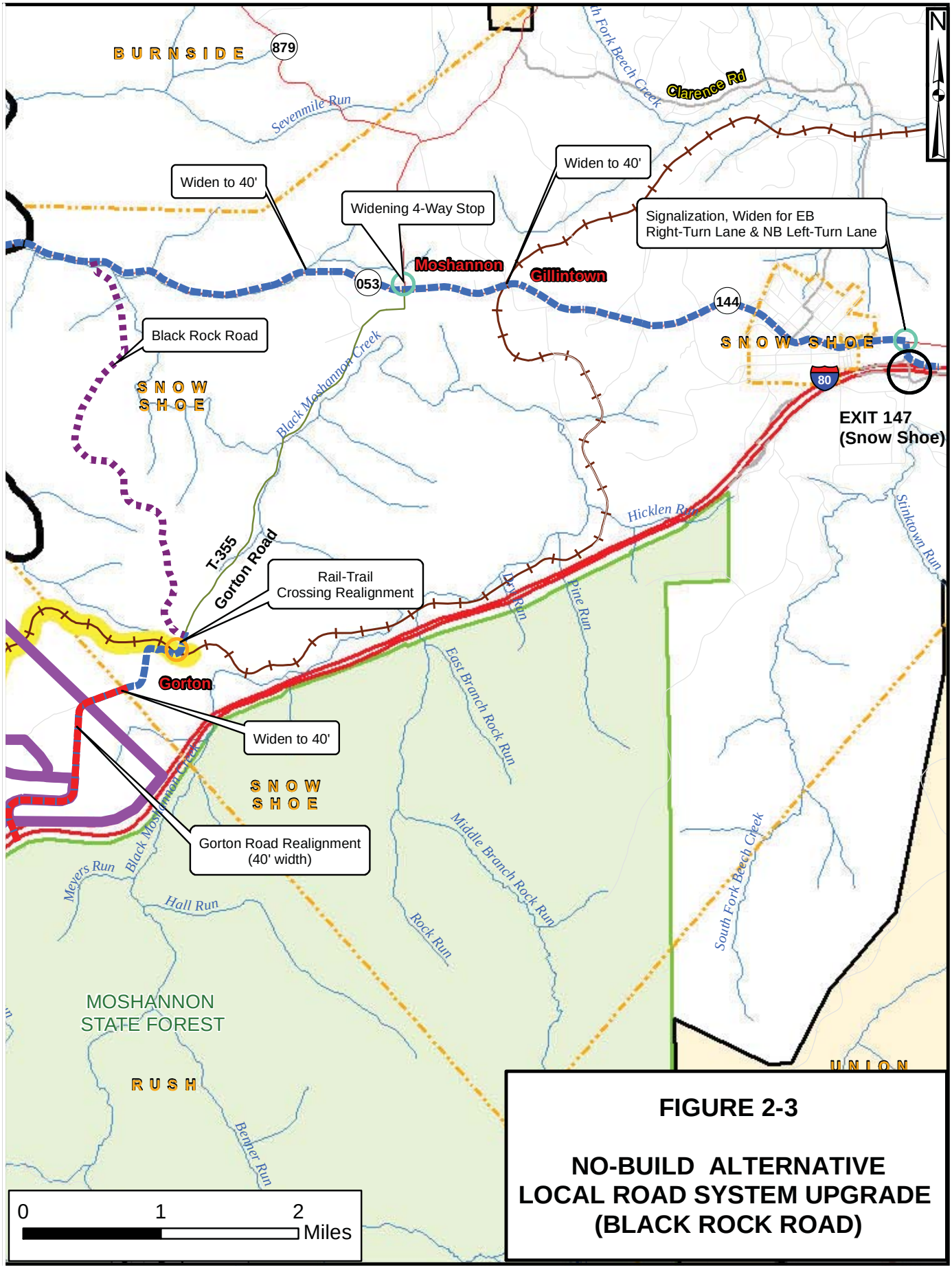


FIGURE 2-3

NO-BUILD ALTERNATIVE
LOCAL ROAD SYSTEM UPGRADE
(BLACK ROCK ROAD)

on the Modified Proposed Action's Western Segment. An ethanol spill along the Proposed Action would have a greater potential to impact people, whereas an ethanol spill along the Modified Proposed Action would have a greater potential to impact the natural environment (i.e., biological resources, water resources, etc.). This would result from the notable differences in land use between the Western Segment's two alternate routes to Munson. Impacts of a spill on the natural environment would, of course, also be undesirable. But potential impacts to people are generally considered more significant than potential impacts to natural resources. In addition, OEA concluded that the significantly greater number of grade crossings associated with the Proposed Action compared to the Modified Proposed Action (i.e., 17 versus 4) would likely increase the probability of occurrence of a train accident for the Proposed Action.

The Black Rock Road alternative, similar to the Local Road System Upgrade alternative, would be less environmentally preferable than either of the rail alternatives. As discussed in Chapter 4 of this SDEIS, the same transportation, operational, and economic inefficiencies exist with the Black Rock Road alternative as they do with the Local Road System Upgrade alternative, which would also result in substantially greater air quality, noise, and energy resource impacts than either of the rail alternatives. The operation of truck traffic over the Black Rock Road alternative would result in an estimated annual fuel requirement that is nearly six times greater than that calculated for the rail alternatives. As a result, this significantly greater fuel requirement would result in an equally greater air quality impact from mobile source emissions that would be generated from the greater fuel usage. From a noise perspective, the Black Rock Road alternative is expected to result in 171 noise-impacted sensitive land uses, compared to only 32 noise-impacted sensitive land uses for the Modified Proposed Action. Additionally, coordination with the U.S. Fish and Wildlife Service (USFWS), Pennsylvania Fish and Boat Commission (PFBC), Pennsylvania Game Commission (PGC) and PA DCNR indicated that the 3.1-mile new roadway construction associated with the Black Rock Road alternative would have a greater potential to impact threatened and endangered species than the original Local Road System Upgrade alternative or either of the rail alternatives. Given the presence of a National Register-listed resource and a potential National Register-eligible historic district, this alternative would also likely have greater adverse effects on historic resources. The major benefit of the Black Rock Road alternative is that it would avoid the Snow Shoe Multi-Use Rail Trail. However, it would result in a greater volume of truck traffic on local roadways, specifically S.R. 0053 and S.R. 0144, thereby impacting activities that take place on portions of the PA Wilds Elk Scenic Drive and PA Bicycle Route V.

As discussed in Chapter 6 of this SDEIS, additional field surveys conducted during the 2010 summer flowering/fruiting season have shown that the previously unidentified *Sparganium* species located in certain wetland habitats along the Western Segment of the Proposed Action and Modified Proposed Action is or likely is *Sparganium americanum*, not the endangered *Sparganium androcladum*.

For the reasons described above, OEA has once again concluded that, despite the additional information presented in this SDEIS, the Modified Proposed Action would continue to be environmentally preferable to the Proposed Action and would also continue to be the environmentally preferable alternative for this project.