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SEA

SERVICE DATE – MARCH 30, 2009

SURFACE TRANSPORTATION BOARD
WASHINGTON, DC 20423

ENVIRONMENTAL ASSESSMENT

STB Docket No. AB-1023 (Sub-No. 1X)

**Puget Sound & Pacific Railroad Company – Abandonment Exemption –
In Grays Harbor, WA**

BACKGROUND

In this proceeding, the Puget Sound & Pacific Railroad Company (PSAP), a subsidiary of RailAmerica, has filed a petition for exemption under 49 U.S.C. 10502 from the prior approval requirements of 49 U.S.C. 10903 seeking to abandon 8,344 feet (1.58 miles) of a line of railroad that begins just south of where the railroad line crosses U.S. Highway 101 and proceeds north to the end of the line in Grays Harbor County, Washington. PSAP states that the rail line proposed for abandonment begins 3424 feet north of the main track clearance off of the Elam Main line and is part of the Horn Spur. The line travels through the City of Hoquiam along Polk Street for about five blocks, then parallels River Street and Perry Street. The rail line then crosses the East Fork of Hoquiam River and terminates on the east side of the East Fork at the Hoquiam Plywood Company, Inc.

PSAP indicates that the proposed abandonment would result in the elimination of twelve public road crossings and six private crossings. The rail abandonment also includes three bridges that are 50 years old or older and are described as follows (traveling south to north): Bridge 1 is wood open deck with wood trestle design, the date of construction is not known; bridge 2, constructed in 1910, consists of a moveable span (swing) bridge with a wood open deck design; and bridge 3 consists of an open deck with wood trestle design, the date of construction is not known.

PSAP states that if the abandonment is approved, it would either sell the line or salvage the track and materials and dispose of the real estate. PSAP believes that if the abandonment is not approved, any revenue generated from future traffic would not be sufficient enough to cover operational or rehabilitation expenses. The right-of-way width varies from approximately 15 feet within the City of Hoquiam to 100 feet in outlying areas. The rail line proposed for abandonment traverses U.S. Postal Service zip code 98550 and to the best of PSAP's knowledge, does not contain any federally granted rights-of-way. A map depicting the line in relationship to the area served is appended to this Environmental Assessment (EA).

ENVIRONMENTAL REVIEW

PSAP submitted an environmental report that concludes the quality of the human environment would not be affected significantly as a result of the abandonment or any post-abandonment activities, including salvage and disposition of the right-of-way. PSAP served the environmental report on a number of appropriate Federal, state, and local agencies as required by the Surface Transportation Board's (Board) environmental rules [49 CFR 1105.7(b)].¹ The Board's Section of Environmental Analysis (SEA) has reviewed and investigated the record in this proceeding.

Diversion of Traffic

According to PSAP, the rail line proposed for abandonment served only one shipper, Hoquiam Plywood, who used the rail line to transport veneer in boxcars inbound to Hoquiam Plywood and plywood in boxcars outbound from the facility. The rail line was embargoed on February 28, 2008 (Embargo Number PSAP000108) due to poor track conditions and since that time, Hoquiam Plywood has been transloading materials at a warehouse in Aberdeen, WA, some two miles away. There has been no traffic on the line since the embargo and according to PSAP, the rail traffic has been diverted to truck transportation over local roads.

PSAP states that in 2005 and 2006, it provided service to Hoquiam Plywood five days per week, and transported inbound and outbound 532 and 470 rail carloads of material, respectively. In 2007, traffic volume decreased to 335 rail carloads and PSAP subsequently reduced its service to two to three days per week. In the first two months of 2008, prior to the embargo, PSAP delivered 36 rail carloads to Hoquiam Plywood. SEA used the truck traffic figure from 2007, the last full year of operation, to calculate the diversions of traffic from rail to truck. Using the conversion factor of four trucks per railcar,² SEA determined that there would be 1,340 truckloads (2,680 assuming an empty backhaul) of traffic on area roadways per year. Based on a 240 day work year, SEA calculates that 2,680 truck trips would add approximately 11 new trucks per day to area roads.³

¹ The railroad's environmental and historic reports are available for viewing on the Board's website at www.stb.dot.gov by going to "E-Library," selecting "Filings," and then conducting a search for AB-1023 (Sub-No. 1X).

² The conversion factor is an estimate used to calculate the rail to truck conversion of varied commodities.

³ The conversion factor is an estimate used to calculate the rail-to-truck conversion of varied commodities added to area roadways during a 240 workday year.

Transportation Impacts

The proposed abandonment would result in an overall decrease in energy consumption due to a decrease in fuel usage, as detailed below. Under the Board's environmental regulations at 49 CFR 1105(e)(4)(iv)(B), if the proposed action would cause diversions from rail to motor carriage of more than an average of 50 rail carloads per mile per year for any part of the affected line, then the resulting net change in energy consumption must be quantified. As stated above, the 335 rail carloads from the base year would be diverted to 1,340 loaded trucks and 1,340 empty trucks. PSAP calculates that the loaded trucks would consume about 596 gallons of diesel fuel based on 1,340 truckloads times two miles divided by 4.5 miles per gallon. The empty trucks would consume 412 gallons based on 1,340 truckloads times two miles divided by 6.5 miles per gallon. The total fuel consumed in trucking the traffic roundtrip from Hoquiam Plywood to the transloading facility would be about 1,008 gallons of diesel fuel.

For calculating fuel consumption during freight operations, PSAP states that the round trip run would take two hours (including switching), use two locomotives, and burn about 7.8 gallons of diesel fuel per hour, two to three times per week. PSAP used the more conservative value of two days per week to calculate fuel consumption. Freight transport would use about 1,622 gallons per year roundtrip based on 104 work days per year (two days per week and 52 weeks per year) multiplied by two hours travel and then multiplied by 7.8 gallons of fuel burned per hour (or 15.6 gallons roundtrip). The total fuel consumption for freight operations would be 1,622 gallons, or 614 gallons of additional diesel fuel burned per year. Therefore, the transportation by truck would result in a reduction in diesel fuel consumption.

The Board has established air quality and noise level thresholds set forth at 49 CFR 1105.7(e)(5) and (e)(6). These thresholds are guidelines that are considered, along with other supporting information, to determine if the air pollution and noise levels generated by rail traffic diverted to alternative modes warrants detailed analysis. The applicable threshold level when assessing air pollution is an average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment. As stated above, the proposed abandonment, including the addition of 11 new trucks per day onto local roads, is not likely to generate traffic above the Board's threshold for analysis. In addition, Grays Harbor County is currently in attainment with the Environmental Protection Agency's (USEPA) National Ambient Air Quality Standards (NAAQS) for all priority pollutants.

Noise disturbance from the salvage activities would be temporary and should not have a significant impact on the area surrounding the proposed abandonment. The major noise source would be additional truck traffic on local roads. SEA estimates that during an 8-hour work day, an additional 11 trucks would travel on area roadways. The resulting increase in noise levels would not exceed the Board's noise threshold under 49 CFR 1105.7(6).

Accordingly, the proposed abandonment would not adversely impact the development, use and transportation of energy resources or recyclable commodities; transportation of

ozone-depleting materials; or result in the diversion of rail traffic to truck traffic that could result in significant impacts to air quality, noise, or the local transportation network.

Salvage Activities

Impacts from salvage and disposal of a rail line typically include removal of tracks and ties, removal of ballast, dismantling of any bridges or other structures that may be present on the rail right-of-way, and regrading of the right-of-way. Salvage may be performed within the right-of-way, or, if necessary, via the construction of new access points to the right-of-way. PSAP states that it does not intend to disturb any subgrade or subgrade structures during salvage and would leave the bridges in place. If the line is used for interim trail use/rail banking, PSAP indicates that it would salvage the track and materials, but leave the ballast, ties, bridges and culverts in place for the use of the trail.

SEA believes that any air emissions associated with salvage operations would be temporary and would not have a significant impact on air quality.

PSAP states that the proposed abandonment would not affect the transportation of hazardous materials. Furthermore, PSAP states that it has no knowledge of hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way or in adjacent areas.

PSAP indicates that the proposed abandonment would have no adverse effect on public health and safety because it intends to remove twelve public road crossings and six private crossings, as well as the portion of line that runs down Polk Street.

The City of Hoquiam (the City) commented on a number of issues regarding the proposed abandonment. First, the City states that it has not been in communication with PSAP regarding the removal of the twelve public road crossings and six private crossings, and is not clear on what standards PSAP intends to use for street restoration. The City is assuming and expecting that the roads would be restored to the City of Hoquiam's road standards. Second, the City is concerned about unsafe conditions (broken pavement, raised planks, and uneven track) associated with the rail line traversing Polk Street, and has requested that PSAP address these safety issues during the abandonment process. Third, contrary to PSAP's statement that the proposed abandonment is consistent with land use plans, the City notes that the land use plans show rail service to Hoquiam Plywood. Fourth, the City questions whether the bridges are historic since the rail line has been in service since 1892, and what their future status is if the abandonment is approved. The City does not want the community to be burdened with maintenance costs and unsafe conditions. Lastly, the City is concerned that the transloading facility, some two miles away, could cause job losses for the City. To ensure that the proposed action does not adversely impact the City of Hoquiam and surrounding community, SEA is including a condition in this EA that requires PSAP to consult with the City of Hoquiam prior to salvage operations and to report the results of communications between both parties back to SEA in writing.

The National Geodetic Survey (NGS) commented that there are approximately two geodetic marks that may be located within the area of the proposed abandonment. SEA is including a consultation condition that requires PSAP to consult with NGS at least 90 days prior to salvage activities for possible relocation of the geodetic marks.

The Washington State Department of Ecology, Shorelands and Environmental Assistance Program commented that coastal management consistency certification is not required in accordance with the Coastal Zone Management Act, 16 U.S.C. 1451 et seq. Therefore, no further consultation is required.

Based on all information available to date, SEA does not believe that salvage activities would cause significant environmental impacts. In addition to the parties of record on the Board's service list for this proceeding, SEA is providing a copy of this EA to the following agencies for review and comment: U.S. Environmental Protection Agency, the National Geodetic Survey, the Natural Resources Conservation Service, the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, Washington Department of Ecology, Washington Department of Fish and Wildlife, Washington Department of Natural Resources, Washington Department of Archaeology and Historic Preservation, Washington Utilities and Transportation Commission, and the City of Hoquiam.

HISTORIC REVIEW

PSAP submitted an historic report as required by the Board's environmental rules [49 CFR 1105.8(a)]. PSAP served the report on the Washington Department of Archaeology and Historic Preservation (State Historic Preservation Office or SHPO) pursuant to 49 CFR 1105.8(c). The SHPO submitted comments to SEA recommending that PSAP conduct a formal survey and inventory of the rail line proposed for abandonment to determine if the line (believed to have been constructed in the late 1800s), or any portion of the line, is eligible for inclusion in the National Register of Historic Places (National Register). No determination of eligibility has been made at this time; however, given the age of the line and length of service, SEA and the SHPO have determined that the three previously mentioned bridges are most likely eligible, and that other portions of the line, such as the bridge approaches, could be deemed eligible as well. Accordingly, PSAP shall retain its interests in and take no steps to alter the historic integrity of all sites and structures on the right-of-way that are eligible for listing or listed in the National register of Historic Places until completion of the Section 106 process of the National Historic Preservation Act, 16 U.S.C. § 470(f).

SEA conducted a search of the National Park Service's Native American Consultation Database <http://home.nps.gov/nacd/> to identify Federally recognized tribes which may have ancestral connections to the project area. SEA is required to consult with tribes pursuant to 36 CFR 800.3(f)(2) to seek their input regarding National Register eligible properties of traditional religious and cultural significance that may be affected by the proposed abandonment. The data base indicated that the following two Federally recognized tribes may have ancestral connections to the project area: the Confederated Tribes of the Chehalis Reservation and the

Quinault Indian Nation. SEA has added the tribes to the service list for this proceeding to ensure that they receive a copy of this EA for comment.

CONDITIONS

We recommend that the following environmental conditions be placed on any decision granting abandonment authority.

1. Prior to commencement of salvage activities, Puget Sound & Pacific Railroad Company (PSAP) shall contact the City of Hoquiam in order to discuss local concerns regarding the safety and condition of the bridges, railroad trestles, infrastructure in the railroad right-of-way along Polk Street, permit requirements for closing crossings, and any other reasonable requirements. PSAP shall report the results of the consultations back to the Section of Environmental Analysis (SEA) in writing.
2. PSAP shall consult with the National Geodetic Survey (NGS) and notify NGS at least 90 days prior to beginning salvage activities that will disturb or destroy any geodetic station markers and report the results of its consultation to SEA in writing.
3. PSAP shall retain its interest in and take no further steps to alter the historic integrity of all sites, buildings, and structures within the project right-of-way (area of potential effects) that are eligible for listing or listed in the National Register of Historic Places until the Section 106 process of the National Historic Preservation Act, 16 U.S.C. § 470(f), has been completed. PSAP shall report back to SEA regarding any consultations with the Washington Department of Archaeology and Historic Preservation and any other Section 106 consulting parties. PSAP may not file its consummation notice or initiate any salvage activities related to abandonment until the Section 106 process has been completed and SEA has removed this condition

CONCLUSIONS

Based on the information provided from all sources to date, SEA concludes that, as currently proposed, and if the recommended condition is imposed, abandonment of the line will not significantly affect the quality of the human environment. Therefore, the environmental impact statement process is unnecessary.

Alternatives to the proposed abandonment would include denial (and therefore no change in operations), discontinuance of service without abandonment, and continued operation by another operator. In any of these cases, the existing quality of the human environment and energy consumption should not be affected.

PUBLIC USE

Following abandonment and salvage of the rail line, the right-of-way may be suitable for other public use. A request containing the requisite four-part showing for imposition of a public use condition (49 CFR 1152.28) must be filed with the Board and served on the railroad within the time specified in the Federal Register notice.

TRAILS USE

A request for a notice of interim trail use (NITU) is due to the Board, with a copy to the railroad, within 10 days of publication of the notice of exemption in the Federal Register. Nevertheless, the Board will accept late-filed requests as long as it retains jurisdiction to do so in a particular case. This request must comply with the Board's rules for use of rights-of-way as trails (49 CFR 1152.29).

PUBLIC ASSISTANCE

The Board's Office of Public Services (OPS) responds to questions regarding interim trail use, public use, and other reuse alternatives. You may contact OPS directly at (202) 245-0230, or mail inquiries to Surface Transportation Board, Office of Public Services, Washington, DC 20423.

COMMENTS

If you wish to file comments regarding this Environmental Assessment, send an **original and two copies** to Surface Transportation Board, Case Control Unit, Washington, DC 20423, to the attention of Diana Wood, who prepared this Environmental Assessment. Environmental comments may also be filed electronically on the Board's web site, www.stb.dot.gov, by clicking on the "E-FILING" link. **Please refer to Docket No. AB-1023 (Sub-No. 1X) in all correspondence, including e-filings, addressed to the Board.** If you have any questions regarding this Environmental Assessment, please contact Diana Wood, the environmental contact for this case, by phone at (202) 245-0302, fax at (202) 245-0454, or e-mail at woodd@stb.dot.gov.

Date made available to the public: March 30, 2009.

Comment due date: April 30, 2009.

By the Board, Victoria Rutson, Chief, Section of Environmental Analysis.

Anne K. Quinlan
Acting Secretary

Attachment