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Date Issued: April 9, 2010
Comments due: May 12, 2010

SURFACE TRANSPORTATION BOARD
Section of Environmental Analysis

DRAFT ENVIRONMENTAL ASSESSMENT

STB Docket No. AB-1043 (Sub-No. 1)

Montreal, Maine & Atlantic Railway, Ltd. –
Discontinuance of Service and Abandonment –
In Aroostook and Penobscot Counties, ME

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

April 9, 2010

Re: STB Abandonment Docket Number AB 1043 (Sub-No. 1), Montreal, Maine & Atlantic Railway, Ltd. – Discontinuance of Service and Abandonment – In Aroostook and Penobscot Counties, ME

Dear Reader:

The Surface Transportation Board's Section of Environmental Analysis (SEA) is pleased to provide you with your copy of the Draft Environmental Assessment for the proposed abandonment of approximately 233 miles of rail line owned by the Montreal, Maine and Atlantic Railway, Ltd (MMA). This Draft Environmental Assessment analyzes the environmental impacts that might occur if the Applicant railroad – MMA – receives authorization to discontinue rail service and abandon the rail line segments currently providing service to shippers in the northern Maine Counties of Aroostook and Penobscot.

The Draft Environmental Assessment presents SEA's preliminary findings regarding the environmental impacts that could occur from the proposed abandonment and also examines possible alternatives to abandonment. These alternatives include continued rail operations by another rail carrier, funding assistance for the current rail operator, discontinuance of rail service with no abandonment, use of the rail right-of-way for railbanking/interim trail use, and the "No-action" alternative, which would maintain the current situation.

As we have worked on this Draft Environmental Assessment, we have heard many concerns from representatives of the people of Maine, the shippers, the railroad, and some Maine agencies. In the process of preparing this Draft Environmental Assessment, we have done our best to reflect the importance of the railroad to the citizens of Northern Maine and the hope for prosperity that the presence of the railroad represents to these citizens. Our responsibility in this document is to disclose to the public and to the decision-makers of the Surface Transportation Board – the Board members themselves – what environmental impacts could result to both the human and natural environment if the Board decides to grant this abandonment. We also, as explained above, set forth potential alternatives to the abandonment, and propose mitigation that could lessen the environmental harms of abandonment.

We have received two requests to prepare an "Environmental Impact Statement" rather than an Environmental Assessment for this proposed abandonment. We have also received a response from MMA regarding these two requests. An Environmental Impact Statement

contains the same basic elements as an Environmental Assessment, but is typically larger and more detailed, takes more time, and costs more money to prepare. Agencies must prepare Environmental Impact Statements for actions that would likely result in “significant environmental impact.” Whether an impact is considered to be “significant” depends on the context of the proposal and the intensity or severity of the impact. Potential environmental impacts may be adverse without being significant.

Here, based on the information that SEA has gathered to date, we believe that the likely environmental impacts that could occur if the Board were to grant this abandonment would be those associated with transporting goods by truck instead of by rail. These potential environmental impacts include increased air emissions, possible decrease of safety on the roadways, wear and tear on the roads, and some increase in noise to people living or attending school in buildings located close to the roadways that the trucks would likely traverse. The likely effect to the economy of Northern Maine, and perhaps to the entire State, should the shippers lose rail service and have to depend on trucking instead, primarily will be examined by the Board as part of the “transportation merits” of this proposed abandonment and not as part of its consideration this environmental review. This approach is consistent with the requirements of the National Environmental Policy Act, which asks agencies to consider the harms (and benefits) to the environment that would likely result from their decisions.

As explained in the Draft Environmental Assessment, SEA has preliminarily concluded that, based on the information available to date, the increased truck traffic would be within the level of traffic accommodated by area roads. And it appears that some of the potential effects on the environment, though adverse, would not be significant with the addition of the mitigation measures recommended. But we have not yet heard directly from a pivotal group--the citizens of Maine--on our preliminary conclusions. We, therefore, will revisit the request for us to prepare an Environmental Impact Statement after we have received the public’s comments on the Draft Environmental Assessment.

After you have had a chance to review our Draft Environmental Assessment, we would appreciate your comments on ways to improve our analyses, your identification of corrections that should be made and areas that you feel warrant further work, and your ideas about mitigation that could reduce potential environmental impacts. The more specific your comments are, the better we will be able to respond to them. We invite you to comment on all aspects of this Draft Environmental Assessment and we are providing a 30-day public comment period for this purpose. Written comments on the Draft Environmental Assessment must be **postmarked by May 12, 2010** and may be submitted by following the instructions below.

- **By mail:** Please send an original to Surface Transportation Board, Case Control Unit, Washington, DC, 20423, attention Diana Wood. Please reference Docket No. AB 1043 (Sub-No. 1).
- **Electronically:** Access the Board’s Web site at www.stb.dot.gov, click on “E-FILING” link. Please reference Docket No. AB 1043 (Sub-No. 1).

After the close of the public comment period on the Draft Environmental Assessment, the Board will carefully consider whether to prepare an Environmental Impact Statement or whether

a Final Environmental Assessment responding to the comments should be prepared. If we prepare a Final Environmental Assessment, we will make that document publicly available. The Board will then issue its final decision on this proposed abandonment, considering both the record on the transportation merits and the full environmental record, which includes the Draft Environmental Assessment, all comments received (including environmental comments made during the hearing in Maine), and the Final Environmental Assessment.

This Draft Environmental Assessment is also available for viewing (and downloading if you wish) on the Board's Web site at www.stb.dot.gov, under "E-Library," then under "Decisions & Notices," beneath the date "4/09/10." If you have questions or would like to speak with me or a member of my staff, please feel free to call or email either me or Ms. Diana Wood at the information below:

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Finally, on March 12, 2010, the Board announced that it would hold a public hearing in Maine following the close of the written record on the transportation merits. Please check the Board's Web site at www.stb.dot.gov for additional information regarding the public hearing.

We appreciate your time and energy and look forward to receiving your comments.

Sincerely,



Victoria Rutson
Chief,
Section of Environmental Analysis

SEA's Summary of Preliminary Major Conclusions

The Section of Environmental Analysis (SEA) at the Surface Transportation Board, has concluded its preliminary review of the potential environmental impacts that could result from the proposed discontinuance of service and abandonment of 233 miles of rail segments of the Montreal, Maine & Atlantic Railway, Ltd. (MMA) in Aroostook and Penobscot Counties, Maine. Based on information provided by the railroad, comments received to date, and independent analysis conducted by SEA, this Draft EA sets forth the following preliminary conclusions:

1. The proposed discontinuance of service over and abandonment of the MMA rail segments would not significantly affect the quality of the human or natural environment, if the Board imposes the mitigation measures recommended.
2. The majority of freight (more than 90%) transported by shippers located along the MMA rail segments proposed for abandonment already moves by truck. Application at 7. In this Draft EA, SEA has conducted a Traffic Diversion analysis assuming that four trucks would be needed to move the amount of freight currently moved by one MMA rail car. Using this 4:1 diversion ratio, SEA assessed two scenarios: the first "without bridge traffic" and the second scenario "with bridge traffic" or a worst case scenario. Under either scenario, traffic diversion "without bridge traffic" of 48,352 trips per year and "with bridge traffic" of 73,344 trips per year, would not increase beyond the current vehicular capacities of any of the affected roadways.
3. SEA has examined a number of alternatives to the proposed discontinuance of service and abandonment of the MMA rail segments that could potentially result in the continuation of rail service by MMA or another operator. SEA has also considered the No-Action alternative, which would maintain the status quo.
4. The increased truck traffic for the worst case scenario ("with bridge traffic" of 73,344 one-way trips per year) that would be diverted from the rail segments proposed to be abandoned would have minimal impact on overall highway safety in the region. Because trucks have generally not been involved in the majority of accidents on the potentially affected roads, the small increase in diverted truck traffic that would result from the proposed abandonment should have a negligible impact on safety. In addition, the Maine Department of Transportation (Maine DOT) has been working to improve traffic flow, mobility, and access in various sections of the I-95, SR-11, and US-1 corridors in Aroostook County.
5. Noise disturbance from the proposed salvage activities would be temporary and would not have an impact on the area surrounding the proposed abandonment. Noise from the increased truck traffic would be below the Board's thresholds on US-1 and I-95, but above on some areas along SR-11. SEA found that the additional trucks would not

introduce a new noise source to this primarily rural and undeveloped wooded area. Therefore, the increased truck traffic would not be a significantly adverse impact.

6. In this Draft EA, SEA has recommended conditions designed to minimize potential impacts to threatened and endangered species, historic and cultural resources, water, air, biological resources, and geodetic station markers. SEA believes that, with the imposition of this mitigation, the potential impacts of the proposed abandonment on these environmental resource areas would not be significant.

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APPENDIX A: Correspondence

1.0 Introduction and Background

1.1 Introduction

The Section of Environmental Analysis (SEA) at the Surface Transportation Board (the Board) has prepared this Draft Environmental Assessment (Draft EA) to identify and evaluate the potential environmental impacts of the Montreal, Maine & Atlantic Railway, Ltd. (MMA) proposal to discontinue service and abandon approximately 233 miles of main line and branch line tracks in Penobscot and Aroostook Counties, Maine (see Figure 1). This Draft EA identifies potential environmental impacts that could occur if rail service is discontinued, all rail traffic currently moving over the MMA rail lines is diverted to truck, and MMA salvaged the 233 miles of rail line that it is seeking to abandon. This Draft EA concludes that, based on the information available to date, those impacts to the environment, though generally adverse, would not be significant. Also in this Draft EA, SEA is recommending mitigation measures that would lessen some, but not all, of these impacts.

SEA has received two requests (one from shippers and one from the Maine Department of Transportation) to prepare a full Environmental Impact Statement (EIS) rather than an EA.¹ SEA has also received a reply from MMA to these two requests. As discussed later in this Draft EA, it does not appear, based on the information available to date, that either request demonstrates that the potential impacts to the environment from this proposed abandonment and discontinuance would be significant. But SEA is expressly reserving judgment on this matter until after we have heard from the public. After the close of the public comment period on this Draft EA (which is May 12, 2010), and careful consideration of all comments received, a final determination will be made as to whether preparation of an EIS is warranted.

SEA welcomes public review and comment on all aspects of this Draft EA. After the close of the public comment period, all comments received will be fully considered and, a decision made as to whether to prepare an EIS or move forward with a Final EA addressing the comments and presenting SEA's final recommendations and additional analysis, if warranted. In either event, when the environmental review process has concluded, the Board will consider the entire environmental record—the Draft EA, all public comments, and either the EIS or the Final EA, including SEA's final environmental mitigation recommendations—in making its final decision on the proposed discontinuance of service and abandonment.

¹ Actions that may significantly affect the environment generally require the Board to prepare an EIS to meet its obligations under the National Environmental Policy Act, 42 U.S.C. 4321. 40 CFR 1501.4(a)(1); 49 CFR 1105.4(f). Actions that may or may not have a significant environmental impact ordinarily require the agency to prepare a more limited EA. 40 CFR 1501.4(c); 49 CFR 1105.4(d). An EA is a concise public document issued by the agency that contains sufficient information for determining whether to prepare an EIS or to make a finding of no significant impact. 40 CFR 1508.9; 49 CFR 1105.4(d). Under the Board's environmental rules, only proposals to build new rail lines typically require the preparation of an EIS. 49 CFR 1105.6(a). EAs normally are prepared for proposals to abandon or discontinue service on rail lines. 49 CFR 1105.6(b)(2). The EA is based on information supplied by the applicant (or an agency-approved third-party consultant that works under SEA's direction and control), and upon independent investigation and verification by SEA that reflects any public comments that have been received. See 40 CFR 1506.5(c), 49 CFR 1105.10(d) (describing the third-party consultant process); 49 CFR 1105.7. Whether an EA or an EIS is prepared, the Board's environmental documentation always is issued first in draft form to allow the opportunity for public review and comment. 49 CFR 1105.10(b), (d).

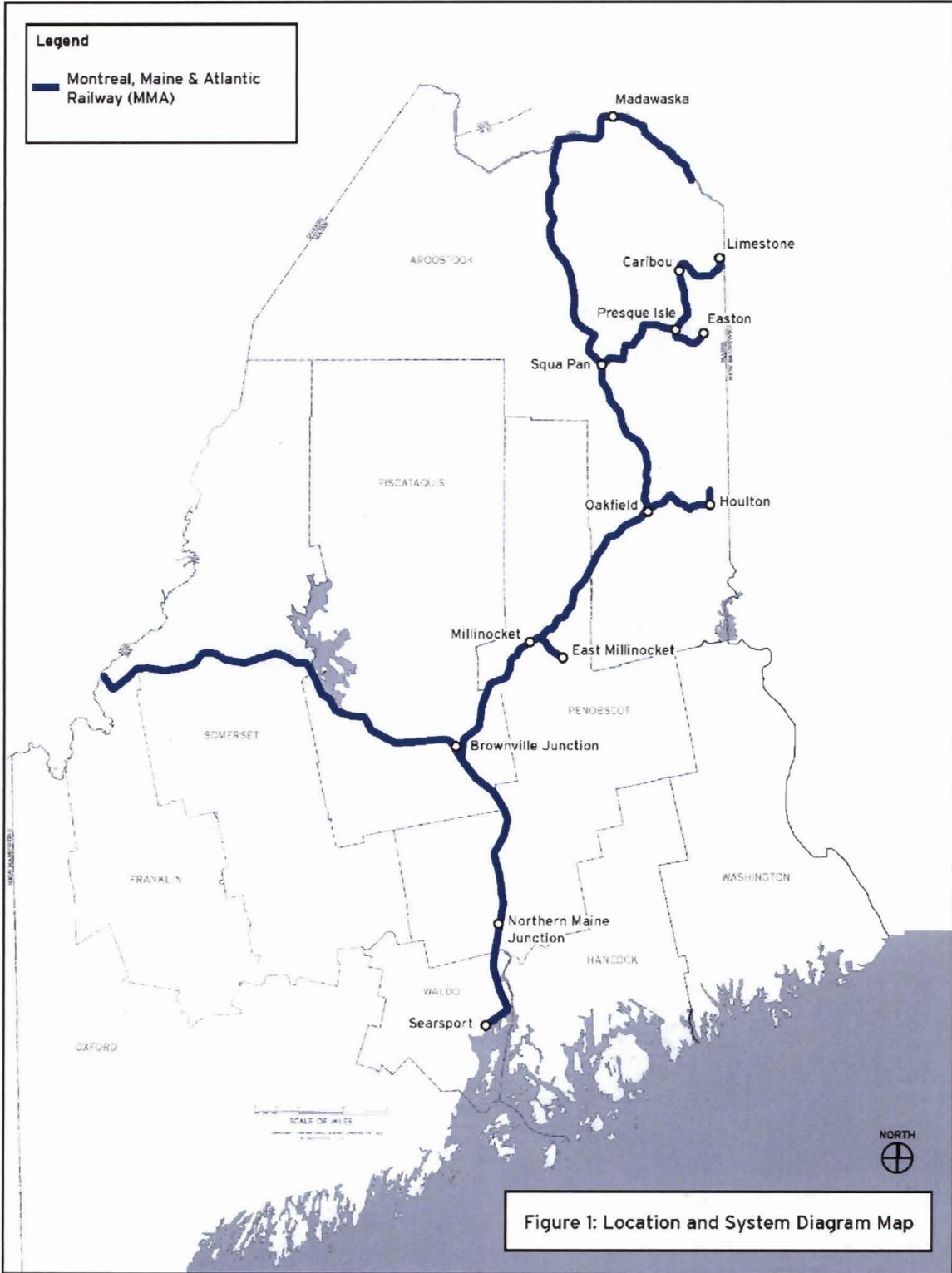


Figure 1: Location and System Diagram Map

1.2 Background

Montreal, Maine & Atlantic Railway

Montreal, Maine & Atlantic Railway, Ltd. (MMA) is a class II rail carrier² that operates approximately 745 miles of rail line in Maine, Vermont, New Brunswick, and Québec. MMA acquired its current rail system from assets of the Bangor and Aroostook Railroad (BAR), a rail line with long history in Maine dating back to 1891. In January 2003, the BAR assets were acquired by Rail World, Inc. and the name of the railroad was changed to the Montreal, Maine & Atlantic Railway. MMA began operating in January 2003 and employs approximately 350 people. See MMA Web site at www.mmarail.com/profile.

On February 25, 2010, MMA filed an application to seek the Board's authority to discontinue service and abandon the 233 miles of its rail line. MMA states that trucking has become increasingly a more competitive alternative to freight rail in Northern Maine and that MMA's carloads and revenues have declined. Despite reducing its operating expenses, MMA says that it has continued to suffer losses from 2007 and sees no end to the downward spiral. MMA explains in its application that it has taken the step to file for discontinuance and abandonment authority at the STB as a step of last resort. Application at 5.

MMA Railway's Discontinuance and Abandonment Proposal

MMA filed its application with the STB pursuant to 49 U.S.C. 10903 and 49 CFR 1152.50 seeking the Board's authority to discontinue service and abandon approximately 233 miles of main line and branch line tracks in Penobscot and Aroostook Counties, Maine (see Figure 2).³ MMA identifies the 233 miles of rail line in its application as "Abandonment Lines." The rail line segments proposed for abandonment by MMA comprise the following:

1. The Madawaska Subdivision, located in Penobscot and Aroostook Counties, between milepost 109 in Grindstone Township near Millinocket and milepost 260 in Frenchville near Madawaska;
2. The Presque Isle Subdivision, located in Aroostook County, between milepost 0.0 at Squa Pan in the town of Masardis and milepost 25.30 in Presque Isle;
3. The Fort Fairfield Subdivision, located in Aroostook County, between milepost 0.0 in Presque Isle and milepost 10.0 in Easton;

² The classification of railroads in the United States was begun by the Board's predecessor agency, the Interstate Commerce Commission, and was based on the operating revenue of the railroads. The largest railroads with the greatest operating revenues are Class I, mid-sized and smaller railroads with less revenue are Class II and Class III. Under the Board's current regulations at 49 CFR 1201, a Class II railroad is defined as a railroad with operating revenues of less than \$250 million but in excess of \$20 million (as adjusted for inflation).

³ Figure 1 depicts all the rail lines in Maine owned by MMA.

4. The Limestone Subdivision, located in Aroostook County, between milepost 0.0 near Presque Isle and milepost 29.85 in Limestone; and

5. The Houlton Subdivision, located in Aroostook County, between milepost 0.0 near Oakfield and milepost 16.9 in Houlton.

The rail segments proposed for abandonment are located in the northeastern edge of Penobscot County (comprising 20 miles in length) and in eastern Aroostook County (comprising 213 miles in length) (see Figure 2), in a heavily forested and rural section of northern Maine. Agriculture and forestry are the principal industries of this area. In particular, the area supports the potato, beef, dairy, broccoli, organic farming, and forest and lumber industries.

The area traversed in Penobscot County by the rail segments proposed to be abandoned is heavily forested and very rural; for example, the town of Staceyville through which the rail line runs has an estimated population of 405 residents. There are over 2000 lakes, rivers, streams, and ponds located within Aroostook County. Aroostook County, with a population of 73,938,⁴ is Maine's largest county, consisting of 6,672 square miles.⁵ Aroostook County's area is larger than the states of Connecticut and Rhode Island combined.⁶

The 233 miles of rail line proposed to be abandoned includes 98 public at-grade road crossings and 214 at-grade private crossings along with 41 bridges over the area's streams and waterways. The railroad right-of-way is generally 100 feet wide. Ownership of the railroad right-of-way for most of the rail line segments proposed to be abandoned is allegedly held by MMA in fee simple title. The right-of-way follows streams and valleys since the topography is hilly and trends toward higher elevations from south to north.

⁴ US Census 2000.

⁵ Aroostook County Web site, www.aroostook.me.us.

⁶ Maine Department of Transportation, TIGER Grant Application, Northern Tier Rail Preservation Project (September 15, 2009) at 8.

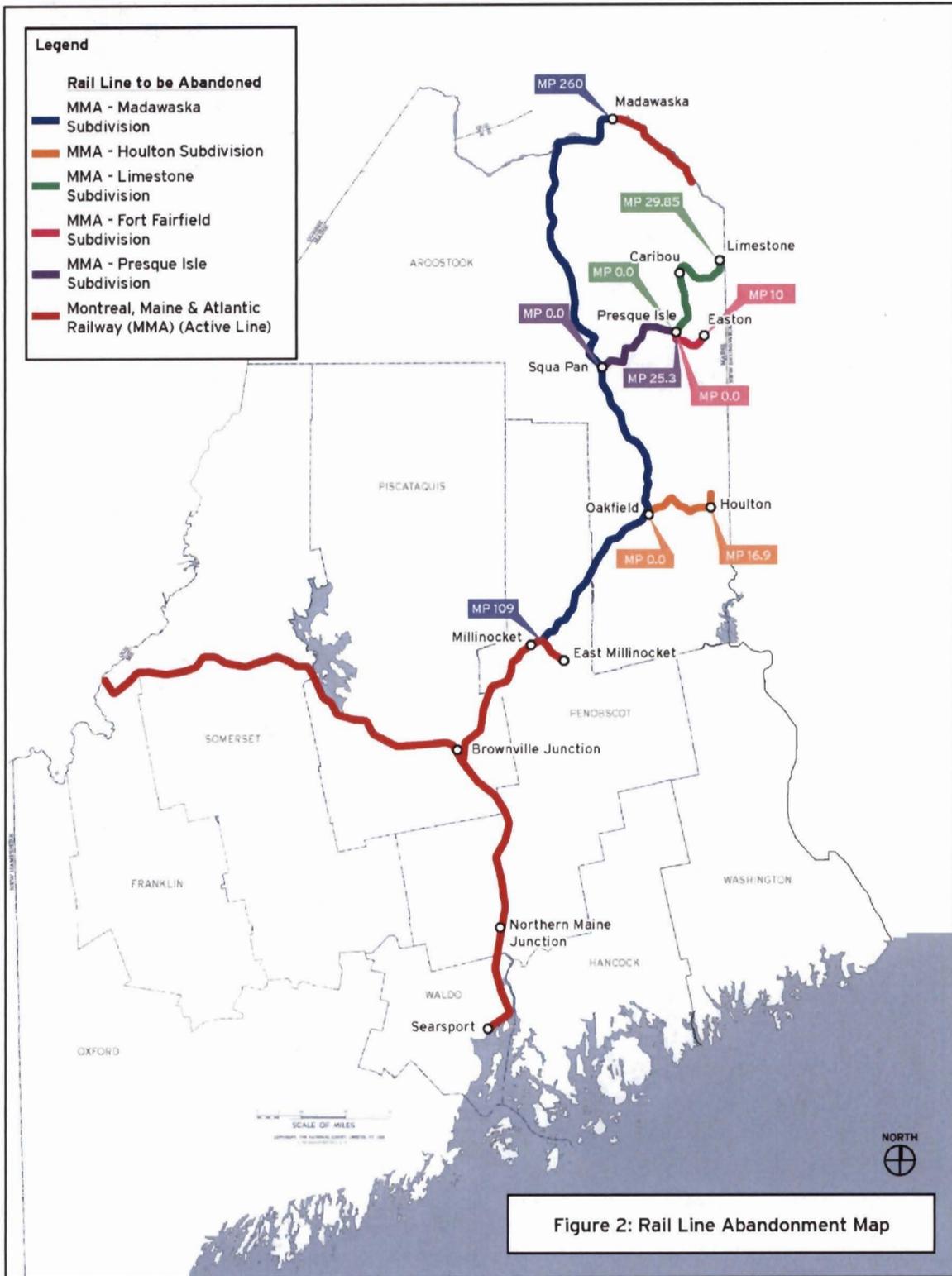


Figure 2: Rail Line Abandonment Map

At the present time, the rail segments proposed to be abandoned are operating at reduced speeds because of the condition of the tracks. The Madawaska Subdivision is in FRA⁷ Class 2 (maximum speed of 25 mph) condition; three branch lines, Houlton, Presque Isle and Fort Fairfield are in FRA Class 1 (maximum speed of 10 mph) condition; and the Limestone Subdivision is mostly FRA "excepted" track (maximum speed of 10 mph and limited hazardous materials). MMA estimates that it would cost millions of dollars for essential upgrades to restore the lines to a condition that would be sustainable given adequate revenues from rail traffic. Completion of this work would restore the Madawaska Subdivision to FRA Class 3 condition (maximum speed of 40 mph) and three of the four branch line subdivisions to FRA Class 2 condition (maximum speed of 25 mph). According to MMA, the Limestone Subdivision would cost additional millions to restore the entire 29.85 miles to FRA Class 1 condition (maximum speed of 10 mph). Application at 17.

If the Board were to authorize this proposed discontinuance and abandonment, MMA states that it would salvage track, ties, and other track materials and sell the underlying real estate. The rail right-of-way and existing private and public roads would be used to access and remove track materials as part of salvaging activities. MMA states that it plans to remove most, if not all, of the track material by rail, starting the process from the north end of the lines to be abandoned and transporting track material south by rail as the track, ties and other track materials are picked up. No new access roads would be contemplated by MMA.

In salvaging the rail segments proposed to be abandoned, MMA does not intend to disturb any of the underlying ballast or track bed or perform any activities that would cause sedimentation or soil erosion. In addition, MMA does not anticipate any dredging or use of fill in the removal of track material. Crossties and any unsalvageable debris would be transported away from the line and would not be discarded along the railroad right-of-way, in streams or wetlands, or along the banks of the waterways.

MMA states that during track removal, it would take appropriate measures to prevent or control the spills of fuels, lubricants, and any other possible pollutant materials resulting from salvage work from entering any waterways. MMA also states that it does not plan to remove any bridges on the line and does not anticipate any dredging or use of fill in the removal of track material near or adjacent to the railroad bridges.

⁷ Federal Railroad Administration, U.S. Department of Transportation, Track Safety Standards at 49 CFR Part 213.9.

1.3 The Board and Its Abandonment and Environmental Review Process

Role of the Board. The Board is an independent Federal regulatory agency with jurisdiction over certain surface transportation matters, including railroad abandonments. Before a railroad may close (abandon or discontinue service over) a rail line that is part of the interstate rail network, it must obtain approval from the Board.

The Abandonment Process. As explained above, on February 25, 2010, MMA filed an application under 49 U.S.C. 10903 for authority to abandon and discontinue service over the approximately 233 miles of line at issue here. MMA's application cites substantial operating losses on the segments proposed for abandonment as the reason for its application. To date, the State of Maine, by and through its Department of Transportation (Maine DOT), has expressed opposition to the proposed abandonment and discontinuance of service. The State asserts that these line segments are vital to northern Maine and the shippers and communities in that area. To preserve service over the lines, the State has expressed its intention to seek to procure funds to purchase the lines. A number of shippers have also expressed interest in the future of these lines.

As required by section 10903, the Board will determine whether "the present or future public convenience and necessity require or permit" the proposed abandonment or discontinuance. In applying this broad public interest standard, the Board employs a balancing test in which it weighs shipper and community need for the line (including any "serious, adverse impact on rural and community development") against the burden that keeping the line open would impose on the railroad and on interstate commerce. This decision by the Board and the record that is established by the railroad applicant and others who participate is known as the "transportation merits" part of an abandonment case.

The transportation merits part of the case proceeds on a different schedule than environmental review and requires formal filings rather than the more informal comment process that is part of the environmental review process. Information submitted on the transportation merits must be served on all parties.

Issues that have been raised in this proceeding such as the likely effect of the proposed abandonment on the economy of Northern Maine, and perhaps to the entire state, should the shippers lose rail service and have to depend on trucking. The financial burden on MMA and on interstate commerce of keeping the rail segments in operation will be considered by the Board when it addresses the transportation merits of this abandonment proposal.

The Separate NEPA Process. Environmental review under the National Environmental Policy Act, 42 U.S.C. 4321 (NEPA), and the Board's environmental rules at 49 CFR Part 1105, takes place at the same time that the record on the transportation merits is being developed, and is a separate process, described below. NEPA applies to all proposals to abandon or discontinue service on rail lines. NEPA requires agencies to consider the harms (and benefits) to the environment that would likely result from their decisions. SEA is responsible for conducting the environmental review on behalf of the Board, evaluating the significance of potential environmental impacts, and making final environmental mitigation recommendations to the Board. The purpose of the NEPA process is two-fold: first, to disclose potential environmental

impacts of the proposed action, and second, to provide an opportunity for public review and comment so that the decision makers – here, the Board – can make a fully informed decision that takes into account the potential environmental consequences to their action.

In performing its environmental analysis for proposed rail abandonment cases, SEA typically prepares an EA. 49 CFR 1105.6(b)(2). The EA process typically begins by evaluating and verifying the Environmental and Historic Reports prepared by the railroad applicant containing the information required by the Board's environmental rules, which must be served on appropriate agencies and other entities at least 20 days prior to the railroad seeking abandonment authority from the Board. See 49 CFR 1105.7 and 1105.8. But in this case, MMA sought SEA's permission to submit environmental information to SEA in the form of a more detailed Preliminary Draft Environmental Assessment (PDEA).⁸ SEA granted MMA's request. After reviewing and verifying the PDEA, on February 4, 2010, SEA served the PDEA on a wide range of Federal, State, and local agencies, and Federally-recognized Indian Tribes in Maine for their preliminary review and comment. Comments on the PDEA were to be submitted in time for MMA to consider them in its application, which was submitted on February 25 (21 days after service of the PDEA).

Three comments were received on the PDEA prior to the filing date of MMA's application (comments from Penobscot Court of County Commissioners, the Maine State Historic Preservation Office, and the Maine Department of Conservation). On March 30, however, SEA received additional comments from the Maine DOT in response to the PDEA. SEA has endeavored to consider and respond to Maine DOT's comments later in this Draft EA, despite their submittal close to the issuance of the Draft EA. Maine DOT's comments and SEA's response are summarized at the end of Section 3.

In preparing this Draft EA, SEA, with the assistance of its independent third-party contractor, HNTB, has reviewed and verified the information in the PDEA, conducted independent analysis, and considered the information provided by MMA in its application and the comments that have received to date. SEA has also developed the recommended mitigation measures set forth below in Section 5.0.

Specifically, SEA has carefully assessed the extent and potential significance of environmental effects related to the proposed abandonment and discontinuance. Consistent with applicable Board precedent and case law, SEA's analysis has focused on the potential environmental impacts that would be associated with diversion of rail traffic to truck and salvage of the rail segments proposed for abandonment.

In its environmental review of MMA's proposal, SEA evaluated the following alternatives and environmental issue areas. First, alternatives to abandonment and discontinuance are:

⁸ The rules of the President's Council on Environmental Quality specifically permit applicants to prepare their own EAs. The PDEA process gives the railroad applicant the opportunity to provide the Board and the agencies that receive copies of it with information specifically targeted to the facts at issue in the proceeding.

- Offer of Financial Assistance under 49 U.S.C. 10904 to preserve rail service by allowing for continued service by another operator or a subsidy
- continued operation under a “modified certificate” or a voluntary sale
- possible funding opportunities that Maine Senators and Representatives are currently pursuing
- preservation of the rail corridor as part of the national rail transportation system under the National Trails System Act, 16 U.S.C. 1247(d), which allows railbanking and interim trail use on lines authorized to be abandoned
- discontinuance of service without abandonment
- public use under 49 U.S.C. 10905
- No-Action alternative, which would maintain the status quo but would not stem the financial losses MMA states it is experiencing.

SEA evaluated the following environmental issues:

- Land Use.
- Transportation, including Traffic Diversion Analysis
- Transportation Safety
- Energy.
- Air Quality and Noise.
- Safety on the rail right-of-way, including an analysis of hazardous materials that may be present or transported on the rail right-of-way.
- Socioeconomic impacts that would result from changes to the physical environment.
- Biological Resources.
- Water Resources, including impacts to wetlands, streams, lakes, ponds, and rivers.
- Historic and Cultural Resources.

Based on the information available to date, SEA concludes that these adverse impacts would not be significant if the preliminary recommended mitigation in this Draft EA is imposed and implemented. As discussed in more detail below, SEA did identify certain adverse impacts, including increased emissions, potential decreased safety on roadways, and some increased noise to people living or attending school in buildings located close to the roads that additional trucks would likely traverse as a result of the proposed abandonment. However, SEA welcomes comments and suggestions on appropriate environmental mitigation from all interested parties during the comment period on this Draft EA. Based on the information that is currently available, SEA intends to recommend that the Board impose the measures in this document as conditions in any final decision that might approve this abandonment and discontinuance proposal. Should another option be pursued, such as an Offer of Financial Assistance or railbanking/interim trails use, the mitigation would not be necessary because there would be no abandonment.

Finally, a word regarding “socio-economic” impacts of rail line abandonments. Some shippers have asked SEA to assess the socio-economic harms that would likely befall many communities in Northern Maine and possibly the entire state if the Board were to allow this

abandonment and the shippers lost rail service. By having to further rely on trucks, the shippers argue, they would suffer further economic harms that could drive them to the point of ceasing their operations and closing their business. Workers would lose their jobs in areas where well paying jobs are scarce.

It is well settled that socio-economic impacts are only required to be assessed in a NEPA analysis to the extent that the potential economic harms are a result of changes in the physical environment. For example, if an agency approved an action that caused wide-spread erosion into waterways and the water quality degraded to the point where fisherman could no longer make a living fishing those waters, that would be a socio-economic impact that must be assessed in the environmental review process. Based on the available information, it does not appear that the socio-economic concerns that have been raised in this case, if they occur, would be caused by changes to the physical environment. Thus, these socio-economic concerns, though very serious for the people of Maine and those of us who are studying, analyzing, and considering options to abandonment, do not require the kind of detailed environmental analysis that some have suggested should be prepared here. Rather, such socio-economic concerns are best addressed as part of the transportation merits of this proceeding. SEA believes this approach is appropriate and reasonable under the circumstances presented in this case.

Public Participation: As previously noted the Board's environmental review process includes consultation with other governmental agencies and involves the public throughout the environmental review process. SEA's purpose in conducting public involvement and agency consultation activities is to gain vital input on the environmental analysis. SEA must be able to assess the public's concerns and communicate them effectively to the Board. In this proceeding, the Board members also will be conducting a public hearing in Maine, which will help the decision makers arrive at a full appreciation of the many issues involved in this abandonment and discontinuance proposal.

After the public has reviewed this Draft EA, SEA would appreciate comments on ways to improve our analyses, make corrections, and supplement what may need further work. SEA invites comment on all aspects of this Draft EA during the 30-day public comment period. Written comments on the Draft EA must be postmarked by **May 12, 2010** and may be submitted by following the instructions below.

- By mail: Please send an original to Surface Transportation Board, Case Control Unit, Washington, DC, 20423, attention Diana Wood. Please reference Docket No. AB 1043 (Sub-No. 1).
- Electronically: Access the Board's Web site at www.stb.dot.gov, click on "E-FILING" link. Please reference Docket No. AB 1043 (Sub-No. 1).

After the close of the public comment period on the Draft EA, and consideration of all the comments received, the Board will decide whether to prepare an EIS or whether it is appropriate to prepare a Final EA responding to the comments SEA has received. If a Final EA is prepared, SEA will make that document publicly available. The Board will then issue its final decision on this proposed abandonment, considering both the record on the transportation merits of the proposed abandonment and the full environmental record, which includes the Draft EA, all

comments received (including any environmental comments made during the hearing in Maine), and the Final EA.

This Draft EA is also available for viewing (and downloading if you wish) on the Board's Web site at www.stb.dot.gov, under "E-Library," then under "Decisions & Notices," beneath the date "4/09/10." If you have questions or would like to speak with me or a member of my staff, please feel free to call or email either me or Ms. Diana Wood at the information below:

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2.0 Alternatives to Abandonment

NEPA requires agencies to consider not just the proposed action during the environmental review process, but all reasonable and feasible alternatives to the proposed action as well. Here, MMA has explained in its application that its decision to seek abandonment and discontinuance authority from the Board was not an easy decision and is, in fact, the step of last resort, given the financial losses that MMA is currently experiencing. Application at 5. This section of the Draft EA sets forth potential reasonable and feasible alternatives to abandonment that would allow rail service in Northern Maine to be preserved or, at least, keep the right-of-way within the national rail transportation system and available for possible reactivation in the future if a voluntary agreement for rail banking/interim trail use could be reached.

2.1 Offer of Financial Assistance

Once abandonment authorization is sought, any person may file an "offer of financial assistance" (OFA) under 49 U.S.C. 10904 and 49 CFR 1152.27 to seek to acquire a line through a forced sale to keep it available for continued rail service. Offers also can be filed to subsidize a line that is the subject of an abandonment application, but no subsidy arrangement approved under the OFA provisions can remain in effect for more than one year, unless otherwise mutually agreed by the parties. See 49 U.S.C. 10904(f)(4)(B).

Once an OFA is filed, the Board reviews it to determine if the offeror is financially responsible.⁹ To establish that it is financially responsible, an offeror must demonstrate that it has, or within a reasonable time will have, the financial resources to fulfill its proposed contractual obligations (which include purchasing the line at the offeror's proposed purchase price). The offeror's initial offer must also be sufficiently reasonable to start negotiations. See 49 U.S.C. 10904(d)(1).

When the Board determines that an OFA by a financially responsible person or organization has been made, the Board must postpone the abandonment to see whether an OFA

⁹ OFAs sometimes are filed by states or local government entities. In that event, the Board assumes that the offeror is financially responsible.

transaction can be accomplished. See 49 U.S.C. 10904(c), (d)(2). The parties then have 30 days to negotiate a voluntary sale of the line. 49 U.S.C. 10904(e). If the parties reach an agreement regarding the price and terms of sale for the line, the Board will authorize the sale of the line and will then dismiss the abandonment proceeding. See 49 CFR 1152.27(f)(2). The parties then are free to consummate the sale. Id.

If the parties cannot agree on a sale price, then either party may ask the Board to set the price, in which case the Board has 30 days to render a decision. 49 U.S.C. 10904(f)(1)(A). After the Board establishes terms and conditions, the offeror has 10 days to withdraw its offer. 49 U.S.C. 10904(f)(2). But if the offeror accepts the Board-set terms and conditions, the railroad is bound to proceed with the sale. Id.

If the rail segments proposed to be abandoned are sold or subsidized under the OFA process there would be no environmental impacts. The MMA rail segments proposed for abandonment would continue to be operated, either by another entity if the rail segments are purchased or by MMA if an offer of subsidy is made. There would be no abandonment or discontinuance, so rail freight would not be diverted from the rail segments to truck and MMA would conduct no salvage activities on the rail segments.

2.2 Continued Operations Under “Modified Certificate” or Voluntary Sale

A modified certificate is a type of license crafted by the agency in a decision entitled Common Carrier Status of States, State Agencies, 363 I.C.C. 132 (1980), aff’d Simmons v. ICC, 697 F.2d 326 (D.C. Cir. 1982). In that decision, the Board’s predecessor agency, the Interstate Commerce Commission (ICC), used its exemption authority in 49 U.S.C. 10505 (now 49 U.S.C. 10502) to authorize states and state agencies to acquire, for the purpose of preserving the opportunity for rail service, rail lines that had been approved for abandonment or had been fully abandoned. The ICC believed that states would be more likely to acquire such lines if the acquisition, and any future termination of service, could be accomplished without the need to comply with traditional regulatory requirements. As part of this process, the ICC established “modified certificates,” under which operators over such state-owned lines could obtain and relinquish operating authority merely by providing notice to this agency pursuant to 49 CFR 1150.21-23. To come to the Board for a modified certificate, the state must have acquired the property through purchase or lease. 49 CFR 1150.21.

Alternatively, proposals for voluntary acquisitions of rail lines that might otherwise be abandoned can be authorized by the Board outside of the OFA process under 49 U.S.C. 10901, 10902, and 11323, as appropriate. Like the OFA process explained above, a modified certificate issued to continue operation of the MMA rail segments proposed for abandonment, or a voluntary acquisition under sections 10901, 10902, and 11323 would not result in any environmental impact. Because there would be no abandonment or discontinuance, the rail segments would continue to be operated and rail freight would not be diverted to truck. Salvage of the rail line segments also would not occur.

2.3 Funding Opportunities to Purchase or Subsidize MMA Rail Segments

The State of Maine is seeking funds to purchase the rail segments proposed to be abandoned. Moreover, bonds might be authorized for that purpose by the State legislature.

One way in which funds might be obtained is through the Railroad Rehabilitation & Improvement Financing (RRIF) Program, which provides direct Federal loans and loan guarantees to finance development of railroad infrastructure. The RRIF program is authorized by the Federal Railroad Administration (FRA) to provide direct loans and loan guarantees up to \$7 billion for projects benefiting freight railroads other than large Class I carriers. The funding may be used to acquire, improve, or rehabilitate intermodal or rail equipment or facilities, including track, components of track, bridges, yards, buildings and shops; refinance outstanding debt incurred for the purposes listed above; and develop or establish new intermodal or railroad facilities. Direct loans can fund up to 100% of a railroad project with repayment periods of up to 35 years and interest rates equal to the cost of borrowing to the government. Eligible borrowers include railroads, state and local governments, government-sponsored authorities, and corporations, joint ventures that include at least one railroad and limited option freight shippers who intend to construct a new rail connection.

Maine DOT had applied for TIGER (Transportation Investments Generating Economic Recovery as authorized by the American Recovery and Reinvestment Act of 2009, Title XII) seeking to obtain funding to purchase and rehabilitate the MMA rail segments proposed for abandonment. When USDOT announced the awards on February 17, 2010, Maine DOT's TIGER grant was not awarded. USDOT did recently award \$14 million in TIGER grant funds to the State of Maine for the enhancement of three ports: Searsport (served by MMA), Eastport, and Portland. The port projects are expected to improve the economic competitiveness in the forest products, wind energy, and bulk containers markets, but they are not specifically targeted at improving the MMA rail segments proposed for abandonment.

With respect to funding through the issuance of bonds, Maine State Senate President Elizabeth Mitchell, Maine House Speaker Hannah Pingree, and Governor John Baldacci recently announced two separate bond initiatives that could provide \$17 to \$20 million to purchase and maintain the MMA lines at issue here. However, a referendum will be required before the State could issue the bonds.

2.4 Discontinuance of Service

Another potential alternative to the proposed abandonment would be for the Board to approve only the discontinuance of freight service, and to deny MMA's request for authority to abandon. Under this option, no salvage activities would occur, and the right-of-way, track, and ties would be left intact for possible active rail use in the future. The culverts and bridges also would continue to be inspected and maintained under this alternative. If there is a discontinuance of service, there would still be a diversion from railroad cars to trucks but salvage activities would not occur.

2.5 Railbanking/Interim Trail Use

Under 16 U.S.C. 1247(d) (the Trails Act), the STB must “preserve established rights-of-way for future reactivation of rail service” by prohibiting abandonment where a trail sponsor¹⁰ offers to assume responsibility for management, payment of taxes and legal liability for the right-of-way. *Id.* The Trails Act--which followed a history of Congressional concern about the loss of rail corridors as a national transportation resource, see Preseault v. ICC, 494 U.S. 1, 5 (1990)---expressly provides that “such interim [trail] use shall not be treated, for [any] purpose . . . as an abandonment. 16 U.S.C. 1247(d). Instead, the right-of-way is “railbanked,” which means that the railroad is relieved of the current obligation to provide service over the line but that the railroad (or any other approved rail service provider) may reassert control in order to restore service on the line at any time in the future.

If a request for a CITU were filed in this case, and the railroad agreed to negotiate and a Trails Act arrangement were reached, the potential environmental impacts of this proposed abandonment would not be eliminated because rail service would be discontinued and the line segments proposed for abandonment could be salvaged. However, railbanking/interim trail use would not result in potential impacts on historic resources because the rail corridor would remain intact. Most importantly, if there were railbanking/interim trail use on these line segments, the rail corridor would not have to be reassembled to permit active rail service in the future.

2.6 Other Public Use

If abandonment authority is granted, and the rail ties and other track material are removed during salvage activities, the MMA right-of-way also could be suitable for other public use under 49 U.S.C. 10905. Future enhancement for development as a transportation, utility corridor, or as discussed above, a trail, within the current right-of-way could be possible. The right-of-way could be used for public or private roads. The right-of-way could also be used as a power and communications corridor for electricity, pipelines, telephone and fiber optics. A timely request containing the requisite four-part showing for imposition of a public use condition (49 CFR 1152.28) would have to be filed with the Board and served on the railroad to pursue a public use condition.

2.7 No-Action

The No-Action alternative must be examined by all agencies conducting an environmental review under NEPA. In this proceeding, the No-Action alternative would result in preservation of the status quo. The abandonment and discontinuance would not be authorized, MMA would be required to continue to serve shippers on the segments proposed for abandonment, and MMA could not conduct any salvage activities on these segments. The potential environmental effects associated with abandonment and the discontinuance of service would not occur.

¹⁰ The trail sponsor can be a State, political subdivision, or qualified private organization. 16 U.S.C. 1247(d).

3.0 Existing Environment and Potential Environmental Impacts of Abandonment

This section presents both the existing environment and the potential environmental impacts of the rail segments that MMA is proposing to abandon and discontinue service over. The areas of upper Penobscot County and Aroostook County, Maine, through which these rail segments pass, are primarily rural and heavily forested. The rail segments proposed for the abandonment start north of the town of Millinocket, passing through the communities of Oakfield, Sherman, Masardis, Fort Kent and other smaller towns and unincorporated territories, and ending in Frenchville south of Madawaska. The branches extend from Oakfield to Houlton; and Squa Pan to Presque Isle, Easton, Caribou and Limestone (see Figure 2). The right-of-way for the rail segments is generally 100 feet wide throughout this area of northern Maine.

If the Board should decide to approve MMA's abandonment proposal and MMA exercises its authority to abandon the rail segments, MMA would have the authority to salvage track, ties, and other track materials and sell the underlying real estate. The right-of-way, as well as existing private and public roads, would be used to access the rail segments to permit MMA to remove track materials. MMA states that it plans to remove most, if not all, of the track material by rail, starting the process from the north end of the rail segments to be abandoned and transporting track material south by rail as the track, ties and other track materials are picked up. As a consequence, MMA would build no new access roads. MMA has stated that it does not intend to disturb any of the underlying ballast or track bed or perform any activities that would cause sedimentation or soil erosion. Moreover, MMA does not anticipate any dredging or use of fill in the removal of track material. To ensure that MMA's salvage activities would not result in sedimentation to water bodies, SEA is recommending a condition requiring MMA to comply with best management practices for preventing soil erosion while conducting any salvage activities of the rail segments.

MMA states that it would transport crossties and unsalvageable debris away from the rail segments, ensuring that these materials would not be discarded along the rail segments' right-of-way, in streams or wetlands, or along the banks of waterways. MMA states that during track removal, appropriate measures would be taken to prevent or control the spills of fuels, lubricants, and any other possible pollutant materials resulting from salvage work from entering any waterways. SEA is recommending a condition to ensure MMA's compliance with best management practices to prevent spills into waterways during salvage activities, should the Board approve MMA's proposed abandonment and should MMA salvage the rail segments.

MMA also states that it does not plan to remove any bridges on the line and does not anticipate any dredging or use of fill in the removal of track material near or adjacent to the railroad bridges. MMA has identified the location of 42 geodetic station markers within 25 feet of the right-of-way for the rail segments proposed for abandonment. MMA anticipates that there would be no disturbance to these geodetic markers during track salvage activities. SEA has included the National Geodetic Survey in its service list for this proceeding to ensure that it receives a copy of this Draft EA for review. SEA is also recommending a condition requiring MMA to notify the National Geodetic Survey 90 days before conducting any salvage activities

on the rail segments proposed for abandonment to avoid damage or loss of any geodetic station markers.

3.1 Land Use

As described earlier in this Draft EA, the landscape in the area of the proposed abandonment is primarily rural. Land adjacent to the railroad is generally wooded, interspersed with wetlands and waterways. Some of the land is in agricultural use. The rail segments proposed for abandonment also pass through commercial and industrial areas within the communities of Houlton, Caribou and Presque Isle. The Presque Isle branch connects to a small portion of the former Aroostook Valley Railroad owned by the Presque Isle Industrial Authority which serves the Skyway Industrial Park. This industrial park and the Presque Isle Airport were developed on the site of a former Strategic Air Command base and also include commercial facilities and an unused intermodal facility. At present, there are three customers served by MMA in the Park: Tater Meal, Columbia Lumber Products, and the Industrial Park itself.

Land use effects related to the proposed abandonment are likely to be minimal. The proposed rail line abandonment is not inconsistent with county and regional land use plans¹¹ and MMA states that any salvaging activities that could occur would be confined to the existing rail segments' right-of-way. The *Caribou Recreational Trails Development & Expansion Feasibility Study (Caibou Study)* published in November 2004, for the City of Caribou indicates that the MMA right-of-way would be suitable for other public uses--such as a trail corridor or tourist facility--should the proposed abandonment be approved and implemented. *The Caribou Study* indicates that the MMA rail corridor in the area would be a "priority corridor" that could be integral to the development of a planned tourist facility.¹²

3.2 Transportation

The region in which the rail segments proposed for abandonment are located is served by a number of public highways. The line between Millinocket and Madawaska is paralleled by Maine Route 11 to Fort Kent and US Route 1 to Madawaska and beyond. Caribou, Presque Isle, and Houlton are served by US Route 1. Route 11 and Route 1 connect with Interstate 95 at Sherman and Houlton, respectively, providing access to the national interstate highway system. Fort Kent, the northern terminus of US Route 1, is a port of entry to Canada. In addition, US Route 1 provides access to Canada at Madawaska, Van Buren, and Houlton as well as a number of smaller ports of entry (see Figure 3). East-west arteries include Maine Route 161, Maine Route 163 and Maine Route 227, which connect Route 11 and Route 1 and provide access to Caribou, Fort Fairfield, and Presque Isle. US Route 1A provides additional capacity from Mars Hill, south of Presque Isle, north through Fort Fairfield, rejoining US Route 1 at Van Buren (see Figure 3). These local routes provide the connections between freight shippers and the major state and interstate routes.

¹¹ For example, the Aroostook County Empowerment Zone Strategic Plan (2008) focuses on development of educational resources, health resources, and the development of tourism as an economic base for the region.

¹² Kent Associates Planning & Design in association with Wright-Pierce Engineers. *Caribou Recreational Trails Development & Expansion Feasibility Study*. November 2004. Information retrieved in October 2009 from www.cariboumaine.org/planning/trailplan.pdf.

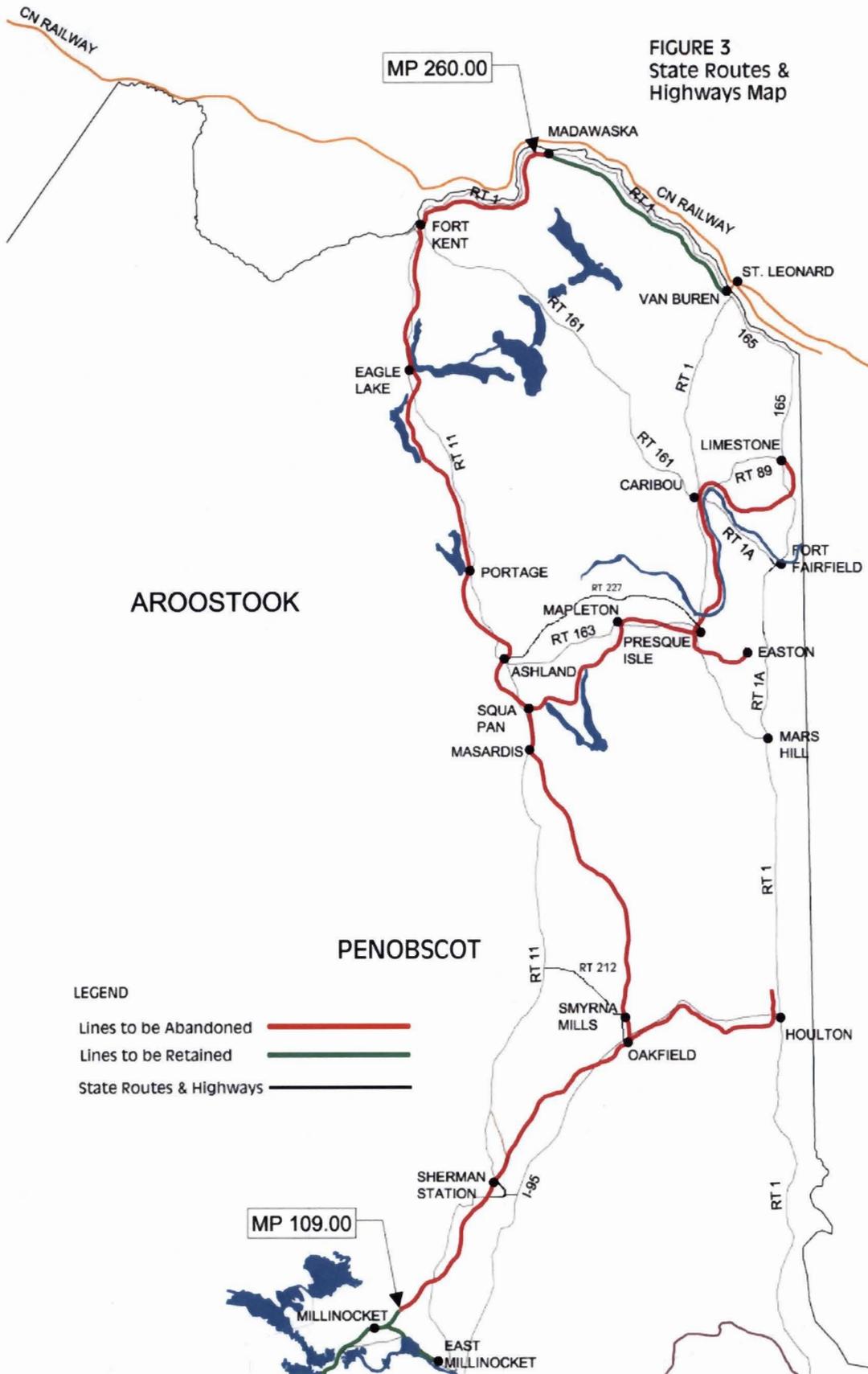


FIGURE 3
State Routes &
Highways Map

AROOSTOOK

PENOBSCOT

LEGEND

- Lines to be Abandoned —
- Lines to be Retained —
- State Routes & Highways —

Listed below are recent estimates of traffic volumes and road capacities (from 2008),¹³ as well as road speed limits, for certain major highways and roads. According to information on the Maine DOT Web site, each of the roads listed below have a weight restriction of 100,000 pounds.

State Route 11 (two lanes)

- Volumes – vary from 2000-4000 vehicles per day, depending on location
- Speed limits – typically 50-55 mph
- Capacity – about 15,000 vehicles per day

US Route 1 (two lanes)

- Volumes – vary from 2500 on rural stretches to 7000-8000 vehicles per day in urban areas (Presque Isle, Caribou)
- Speed limits – typically 50-55 mph, except in urban areas
- Capacity – 18,000 – 20,000 vehicles per day

State Route 163 (two lanes)

- Volumes – vary from about 3000 (on the Ashland end) to about 8000 (on the Presque Isle end)
- Speed limits – typically 50 mph, except in urban areas
- Capacity – about 15,000 vehicles per day

State Route 2 (two lanes)

- Volumes – vary from about 1500 (vicinity Oakfield) increasing to about 10,000 further south
- Speed limits – typically 50-55 mph, except in urban areas
- Capacity – about 15,000 vehicles per day

US Route 1A (vicinity Easton) (two lanes)

- Volumes – about 2000 vehicles per day
- Speed limits – 55 mph
- Capacity – 15,000 – 18,000 vehicles per day

Interstate 95 (four lanes, two in each direction)

- Volumes – vary from 5000-7000 vehicles per day. (The volumes gradually increase traveling from north to south.)
- Speed limits – 65 mph
- Capacity – 50,000 – 55,000 vehicles per day

In addition to these public highways, MMA states that there are numerous private roads within the region that provide truck transportation for the logging and forest products industry. The region in which the rail segments proposed for abandonment are located is also served by airports located at Presque Isle, Caribou, and Houlton.

¹³Maine Department of Transportation Traffic Volume Counts, Annual Report, 2008, and additional data from Maine DOT Bureau of Planning.

Traffic Diversion Analysis

Using public and MMA data on rail freight traffic for the rail segments proposed for abandonment and roadway traffic data from the Maine Department of Transportation (Maine DOT), SEA has preliminarily determined that the existing roadway network could support the additional truck traffic that could be generated as a result of the proposed abandonment.

Since 2005, MMA has experienced a steady decline in its rail freight traffic for shippers on the lines proposed to be abandoned. Indeed, the vast majority of the traffic of the shippers that use MMA's rail service already moves by truck on area roadways, and a significant portion of the decline in MMA's rail traffic volume relates to reduced production by the shippers, as well as closures of paper mills and periodic shutdowns at paper companies. Economic indicators¹⁴ suggest that these markets will continue to decline, resulting in further deterioration of the railroad's traffic base.

In addition to the overall economic downturn, competition from the trucking industry in northern Maine draws traffic away from the railroads in the region. According to modal market share data prepared for Maine DOT as part of the Maine State Rail Plan, which is currently being developed, trucking dominates the region's goods movement with a strong 85% market share. Rail's market share is approximately 5-6 %.

At public meetings held to gather public comments related to the Maine State Rail Plan, many rail shippers reported dissatisfaction with existing freight rail service, and noted that they often use trucks to transport their goods, with many using trucks more often than rail.¹⁵ Maine is served by many national trucking companies and smaller, privately owned local truckers. The trucking industry in the region appears to have sufficient capacity (equipment, drivers) to handle both current truck traffic as well as the additional truck traffic that could be diverted from rail if the rail segments at issue here were approved for abandonment.

According to information in the application, the majority of MMA's rail traffic is directly related to the paper and forest products industries, principally in the form of logs, lumber, wood chips, oriented strand board, wood pulp, and paper products. These products are shipped to markets within Maine and into the central US and eastern Canadian markets. Some paper products from Maine are also reaching overseas markets, moving via local ports and west coast ports via intermodal shipments (containers). MMA has estimated that system-wide, paper and forest products represent 24 percent of its overall business. For the rail segments proposed for abandonment, however, MMA states that this number constitutes 81 percent of business.

¹⁴ Based on draft reports submitted by Southern Maine University, Muskie School of Public Service, and Moody's Economy.com, the Maine State Rail Plan (currently under development by Maine DOT) indicates minimal to negative growth for rail dependent industries, especially in northern Maine. (2009 draft reports). Maine DOT has announced on its Main State Rail Plan Web site (www.maine.gov/mdot/railplan) that its "recent efforts on the potential MM&A abandonment, as well as the newly granted Portland-Brunswick ARRA funding, has delayed the release of the draft Maine State Rail Plan."

¹⁵ MSRP Web site (www.maine.gov/mdot/railplan); summaries of 2009 public meetings.

MMA’s application further indicates a lack of potential new customers and that increased rail use by MMA’s existing customers is unlikely.

In the PDEA (the preliminary environmental review that SEA submitted to agencies and Tribes in February 2010), MMA relied on a diversion ratio of 2.3:1—that is, if the rail traffic moving on the MMA rail segments proposed for abandonment were totally diverted to truck, 2.3 trucks would be needed to carry the amount of freight that one rail car could transport. Based on comments received from Maine DOT, and in order to present a conservative analysis, SEA has performed its diversion analysis in this Draft EA using a ratio of 4 trucks to 1 railcar. This 4:1 ratio is the conversion factor SEA typically uses in its rail abandonment environmental reviews. SEA sees no reason to depart from its normal procedures here. Also, SEA has performed a “worst case” analysis that adds so-called bridge traffic (overhead traffic that neither originates nor terminates on the rail segments at issue here) to the numbers of trucks resulting from the proposed abandonment. As discussed below, neither analysis—the 4:1 ratio without bridge traffic and the “worst case scenario” that includes bridge traffic—shows a discernable adverse effect to the regional or local transportation systems.

Diversion Analysis Scenarios

SEA based its traffic diversion analysis on the freight traffic information in MMA’s application for the MMA base year (October 2008 to September 2009). During this period, a total of 9,168 rail cars traversed the rail segments proposed for abandonment (6,044 with origination and destination (O&D) or local traffic on the rail segments, and 3,124 as bridge traffic. Table 1 breaks down these rail cars into their associated stations, based on available information.

Table 1 – Rail Car Locations

Station	Rail Cars	
	Subject Lines	Bridge Traffic*
Ft. Kent	576	298
Portage	1044	539
Skerry	2,025	1,047
Ashland	576	298
St. Croix	343	177
Caribou	249	129
Presque Isle	576	298
Easton	343	177
Houlton	312	161
Total	6,044	3,124

* SEA has assigned bridge traffic to on-line stations to develop a “worst case” scenario for all rail cars that would be converted to trucks as a result of this proposed abandonment.

Table 2 estimates the number of trucks associated with each of the stations identified in Table 1, based on a ratio of 4 trucks to 1 rail car (4:1). In examining Table 2, it is important to note the following:

- The column labeled “Without Bridge Traffic” represents the volume of trucks that would result if *all bridge traffic shifted to another rail line*, with no diversion to trucks.
- The column labeled “Bridge Traffic”—the worst case scenario—represents the volume of trucks that would result if *all bridge traffic diverted to trucks*. It represents an upper limit to the estimate of the number of truck trips that would result from abandonment.

Table 2 – Trucks Associated with Rail Stations, based on 4:1 Ratio

Station	Additional Trucks	
	<i>Without Bridge Traffic</i>	<i>With Bridge Traffic*</i>
Ft. Kent	2,304	3,496
Portage	4,176	6,332
Skerry	8,100	12,288
Ashland	2,304	3,496
St. Croix	1,372	2,080
Caribou	996	1,512
Presque Isle	2,304	3,496
Easton	1,372	2,080
Houlton	1,248	1,892
Total	24,176	36,672

In other words, if all existing bridge traffic shifts to another rail route, then 24,176 trucks would be required to replace the cargo capacity of the 6,044 rail cars cited in Table 1. If all existing bridge traffic shifts to trucks, then 36,672 trucks would be required to replace the cargo capacity of the 9,168 rail cars (combined subject lines and bridge traffic).

The actual number of truck *trips* that would be added to the transportation system will be greater, since most trucks serving the area would be “deadheading” in either the inbound or outbound direction. This means that, for a cargo-carrying truck trips, there would be a corresponding empty trip. Therefore, the actual number of truck trips used to replace the MMA carrying capacity would be two times as great as the numbers cited in Table 2. For the “without bridge traffic” scenario, the actual volume of truck traffic would be 48,352 trips per year. For the “with bridge traffic” scenario, the truck volume would increase to 73,344 trips per year (cargo-carrying trips plus empty trips).

In terms of quantifying the impact to local roads, SEA made the following assumptions:

- Freight demand would continue to hold steady over the coming year.
- All rail traffic would convert to truck traffic.
- Traffic associated with the stations at Ft. Kent, Portage, Skerry, Ashland, and St. Croix would use State Route 11 (SR-11). This totals 36,512 trips per year in the “without bridge traffic” scenario, and 55,384 trips per year in the “with bridge traffic” scenario.
- Traffic associated with the stations at Caribou, Presque Isle, and Easton would use US Route 1 (US-1). This totals 9,344 trips per year in the “without bridge traffic” scenario, and 14,176 trips per year in the “with bridge traffic” scenario.
- Traffic from all stations would ultimately combine to travel on I-95. This would represent the full volume of traffic cited above—48,352 trips per year in the “without bridge traffic” scenario, and 73,344 trips per year in the “with bridge traffic” scenario.

In examining the potential impacts to local roads from increased truck traffic that would result from the proposed abandonment, SEA has preliminarily concluded that the large network of local roads combined with the wide geographic distribution of shippers in Aroostook and Penobscot Counties would likely result in minimal impacts to local roads.

Table 3 reflects the volume of additional average daily truck traffic that would result if this abandonment were to be approved, based on the assumption of 240 workdays per year (consistent with SEA's practice). The table then compares this volume of additional truck traffic with the average daily volume on each roadway. These volumes are based on traffic count data provided by Maine DOT.¹⁶ The top portion of the table summarizes the impact in the "without bridge traffic" scenario, while the bottom portion summarizes the impact in the "with bridge traffic" scenario.

Table 3 – Summary of Truck Impact on Average Daily Traffic

Scenario	Route	Additional Truck Traffic		Existing Daily Volume	%Increase due to Trucks
		Per year	Per day		
Without Bridge Traffic	SR-11	36,512	152	2,000	7.6%
	US-1	9,344	39	7,060	0.6%
	I-95	48,352	201	7,000	2.9%
With Bridge Traffic	SR-11	55,384	231	2,000	11.5%
	US-1	14,176	59	7,060	0.8%
	I-95	73,344	306	7,000	4.4%

Two-lane roadways such as SR-11 and US-1 typically have capacities of approximately 15,000 to 18,000 vehicles per day, while interstate roadways such as I-95 typically reach capacity at about 45,000 to 50,000 vehicles per day. Even under the worst case scenario—the "with bridge traffic" scenario—US-1 would be operating at less than 50% of its capacity. Table 3 above shows the existing volume of 7,060 vehicles per day on that road. The expected addition of 59 trucks per day that would result from the proposed rail abandonment would yield a daily volume of about 7,100 vehicles per day. This is less than half the expected capacity of 15,000-18,000 vehicles per day on US-1.

Similarly, in the "with bridge traffic" scenario, Route 11 would be operating at about 15% of its capacity ($2,231 \div 15,000$), while I-95 would be operating at 16% of its capacity ($7,306 \div 45,000$). For the purposes of this analysis, it was assumed that all additional truck traffic ultimately travels on I-95 to ship commodities and products throughout Maine and other states.

Besides measuring the impact on local roads, SEA also computed the total additional vehicle-miles traveled (VMT) that would be added by the additional truck trips. Table 4 summarizes the VMT calculations. The mileage figures are based on the assumption that 50% of the trips would stay within the state, while the other 50% of the trips would leave the state via I-95. The only exception would be traffic associated with Ashland, which—because of the unique characteristics of its cargo—was assumed to exhibit a split of 25% in-state vs. 75% out-of-state (O-O-S).

¹⁶ This data may be viewed on-line at <http://www.maine.gov/mdot/traffic-counts/2008tc.php>. The SR-11 count was taken at Masardis (south of Ashland), the US-1 count was taken at the Houlton/Littleton town line, and the I-95 count was taken from Medway.

Table 4 – VMT Summary, MMA-related Truck Traffic

Sc.	Location	Trucks			Trip Length (in Maine)		VMT		
		Total	In-State	O-O-S	In-State	O-O-S	In-State	O-O-S	Total
Without Bridge Traffic	Ft. Kent	4608	2304	2304	215	368	495,360	847,872	1,343,232
	Portage	8352	4176	4176	177	330	739,152	1,378,080	2,117,232
	Skerry	16200	8100	8100	175	328	1,417,500	2,656,800	4,074,300
	Ashland	4608	1152	3456	166	319	191,232	1,102,464	1,293,696
	St. Croix	2744	1372	1372	151	304	207,172	417,088	624,260
	Caribou	1992	996	996	201	354	200,196	352,584	552,780
	Presque Isle	4608	2304	2304	188	341	433,152	785,664	1,218,816
	Easton	2744	1372	1372	185	338	253,820	463,736	717,556
	Houlton	2496	1248	1248	148	301	184,704	375,648	560,352
							Total	4,122,288	8,379,936
With Bridge Traffic	Ft. Kent	6992	3496	3496	215	368	751,640	1,286,528	2,038,168
	Portage	12664	6332	6332	177	330	1,120,764	2,089,560	3,210,324
	Skerry	24576	12288	12288	175	328	2,150,400	4,030,464	6,180,864
	Ashland	6992	1748	5244	166	319	290,168	1,672,836	1,963,004
	St. Croix	4160	2080	2080	151	304	314,080	632,320	946,400
	Caribou	3024	1512	1512	201	354	303,912	535,248	839,160
	Presque Isle	6992	3496	3496	188	341	657,248	1,192,136	1,849,384
	Easton	4160	2080	2080	185	338	384,800	703,040	1,087,840
	Houlton	3784	1892	1892	148	301	280,016	569,492	849,508
							Total	6,253,028	12,711,624

As Table 4 indicates, it is anticipated that the additional truck traffic would increase statewide VMT by 12.5 million in the “without bridge traffic” scenario, and by 18.8 million in the “with bridge traffic” scenario. In either scenario, roughly one-third of this additional VMT would be generated by trucks making trips within the state of Maine, while the other two-thirds of the additional VMT would be generated by trips that either start or end their trip outside of the state of Maine.

Table 5 further breaks down the data to show the VMT that would occur (a) within Aroostook County, (b) within Penobscot County, and (c) elsewhere within the state of Maine.