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240085

ENTERED
Office of Proceedings
February 9, 2016
Part of
Public Record

February 8, 2016

Karl Morell

E-FILED

Ms. Victoria Rutson, Esq.
Environmental Analysis Chief
Surface Transportation Board
395 E Street, SW, Room 1106
Washington, DC 20423

Re: STB Docket No. AB 6 (Sub-No. 492X), BNSF Railway
Company -- Abandonment Exemption -- In Thurston County,
Washington

Dear Ms. Rutson:

Attached for filing is a copy of BNSF Railway Company's ("BNSF")
Environmental and Historic Reports prepared pursuant to 49 C.F.R.
§§1105.7 and 1105.8.

BNSF anticipates filing a Notice of Exemption seeking authority to
abandon the 1.43-mile rail line on or after February 29, 2016.

Sincerely,



Karl Morell

EXHIBIT A

EXHIBIT B



Emily Thompson
Paralegal
Law Department

BNSF Railway Company
2500 Lou Menk Drive - AOB-3
Fort Worth, Texas 76131-2828

tel 817-352-2376
fax 817-352-2367

Email - emily.thompson@bnsf.com

July 29, 2015

Keith Stahley, Director
Department of Planning and Development
City of Olympia
601 4th Ave. E
Olympia, WA 98501

**Re: STB Docket No. AB 6 (Sub-No. 492X); BNSF Railway Company –
Abandonment Exemption – in Thurston County, Washington**

BNSF Railway Company ("BNSF") anticipates filing in about 60 days a Notice of Exemption seeking Surface Transportation Board ("STB") authority in the above-referenced docket to abandon 1.43 miles of rail line in Thurston County, Washington, between Milepost 14.57 and Milepost 16.0.

As part of the environmental report, BNSF is required to contact you to determine if the proposed abandonment is consistent with existing land use plans. If applicable, please describe any inconsistencies.

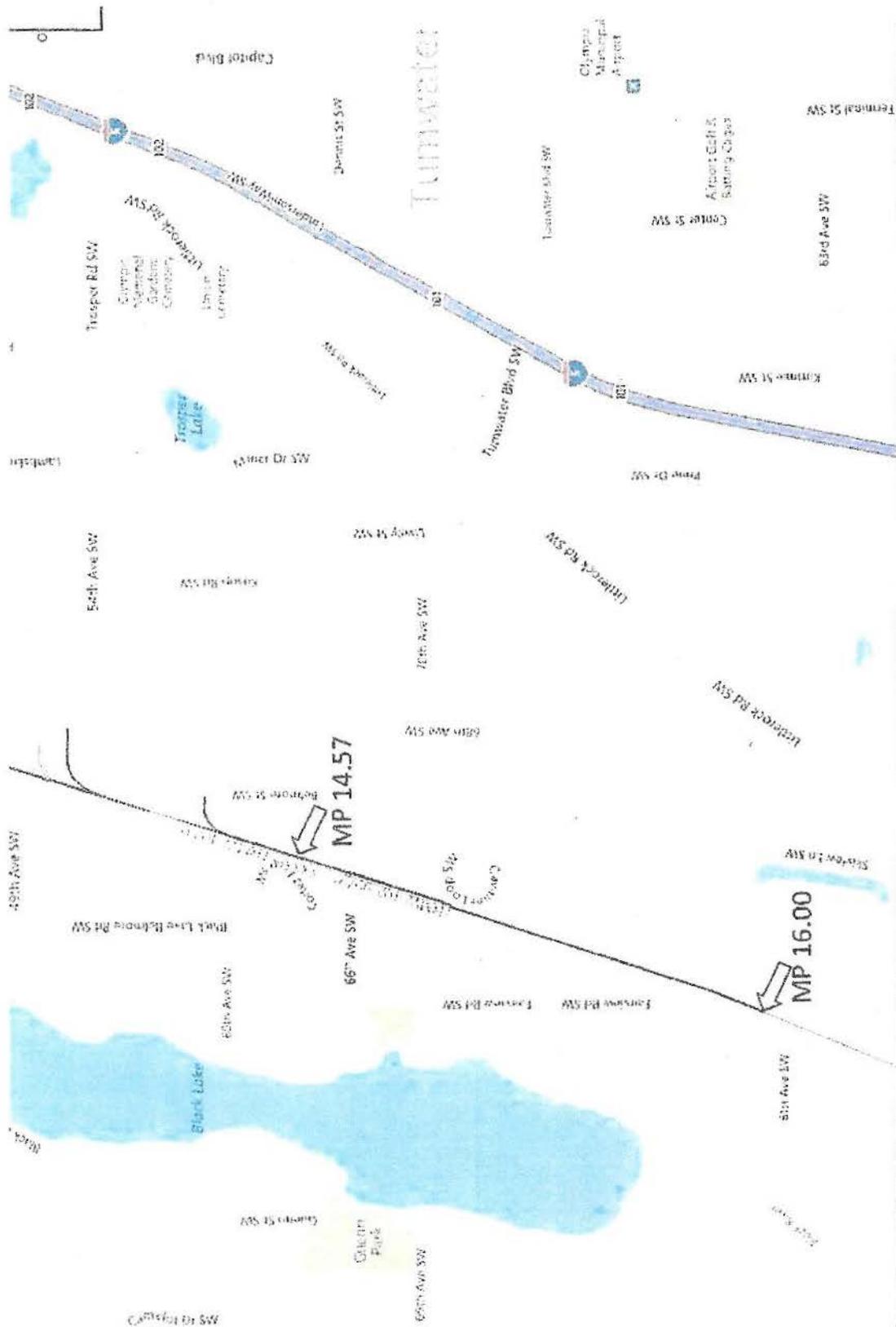
Your assessment and comments are respectfully requested. For your reference a map of the subject railroad line is enclosed. Please provide your response to me at the address above, if at all possible, by October 2, 2015. You may contact me by email or telephone with any questions or concerns. Thank you in advance for your time and contribution.

Sincerely,

Emily Thompson
Paralegal

Enclosure as stated

cc via email: Courtney Estes – BNSF – courtney.estes@bnsf.com
Tyler White – BNSF – tyler.white2@bnsf.com
Karl Morell – Karl Morell & Associates – karlm@karlmorell.com
Mark Norton – BNSF – mark.norton@bnsf.com
John Sims – BNSF – john.sims@bnsf.com



MP 14.57

MP 16.00



Emily Thompson
Paralegal
Law Department

BNSF Railway Company
2500 Lou Menk Drive – AOB-3
Fort Worth, Texas 76131-2828
tel: 817-352-2376
fax: 817-352-2397
Email – emily.thompson@bnsf.com

July 29, 2015

Thurston County Planning Department
2000 Lakeridge Dr. SW
Olympia, WA 98502-6045

**Re: STB Docket No. AB 6 (Sub-No. 492X); BNSF Railway Company –
Abandonment Exemption – in Thurston County, Washington**

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As part of the environmental report, BNSF is required to contact you to determine if the proposed abandonment is consistent with existing land use plans. If applicable, please describe any inconsistencies.

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John Sims – BNSF – john.sims@bnsf.com

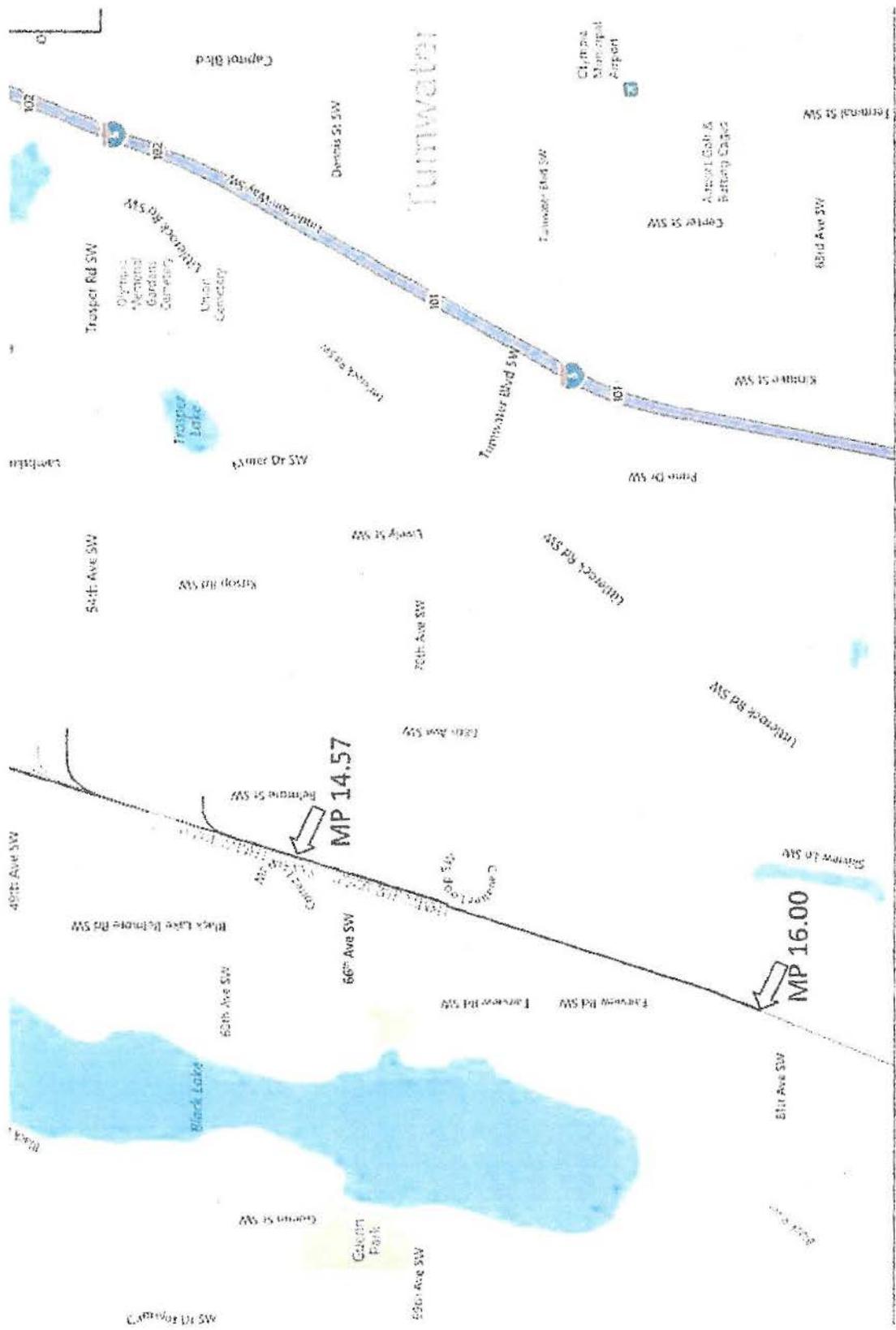


EXHIBIT C



Emily Thompson
Paralegal
Law Department

BNSF Railway Company
2500 Lou Menk Drive - AOB-3
Fort Worth, Texas 76131-2628
tel 817-352-2376
fax 817-352-2397
Email emily.thompson@bnsf.com

July 29, 2015

Ms. Roylene Rides-at-the-Door
Washington NRCS State Office
316 W. Boone Ave., Suite 450
Spokane, WA 99201-2348

**Re: STB Docket No. AB 6 (Sub-No. 492X); BNSF Railway Company –
Abandonment Exemption – in Thurston County, Washington**

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As part of the requisite environmental report, BNSF needs to know whether or not the proposed abandonment will have any effect on prime agricultural lands. Your assessment and comments are respectfully requested.

For your reference a map of the subject railroad line is enclosed. Following is information on BNSF's salvage process as it relates to this project that should also be of use:

The proposed abandonment will include the removal of the rails and ties; however, the railroad right of way, ballast and culverts will remain in place.

The salvage process begins with the unbolting of the track materials or rails. With the use of specialized machinery placed on the railroad right of way, the rails and related steel (angle bars, tie plates, spikes, switches and any other metal parts) are removed. Next the wooden ties are raised from among the ballast with a tool designed for minimum disruption of ground material. The ties are separated into three groups as follows: (1) good quality ties that will be re-used in rail service, (2) landscape-quality ties that will be re-sold to lumber dealers for landscaping and (3) scrap ties. Scrap ties are loaded into railcars and shipped by BNSF to an EPA-approved disposal site.

The culverts, ballast and right of way will remain intact so as not to alter the prevailing waterflows along the line. In addition, BNSF salvage contractors are required to limit their activities to the width of the right of way and not to place fills or other material in water bodies, including inland waterways. When the salvage process is complete, waterflows in the area should not be disrupted. Finally, road crossings are removed and remediated, then repaved with gravel, asphalt or concrete, as required by governing authority. Any signals are also dismantled and removed.

BNSF salvage work for abandonments is always performed by experienced rail material salvagers and is generally bid on the open market. Each salvage contract includes detailed information on any environmental or historical conditions recommended by the Office of Environmental Analysis and imposed by the Surface Transportation Board in their final decision. Completed work is independently inspected by a BNSF roadmaster (or equal representative) to ensure compliance with BNSF standards of quality and all contractual obligations, including STB-imposed conditions, if applicable.

Please provide your assessment and comments to me at the address above, if at all possible, by October 2, 2015. You may contact me by email or telephone with any questions or concerns.

Thank you in advance for your time and contribution.

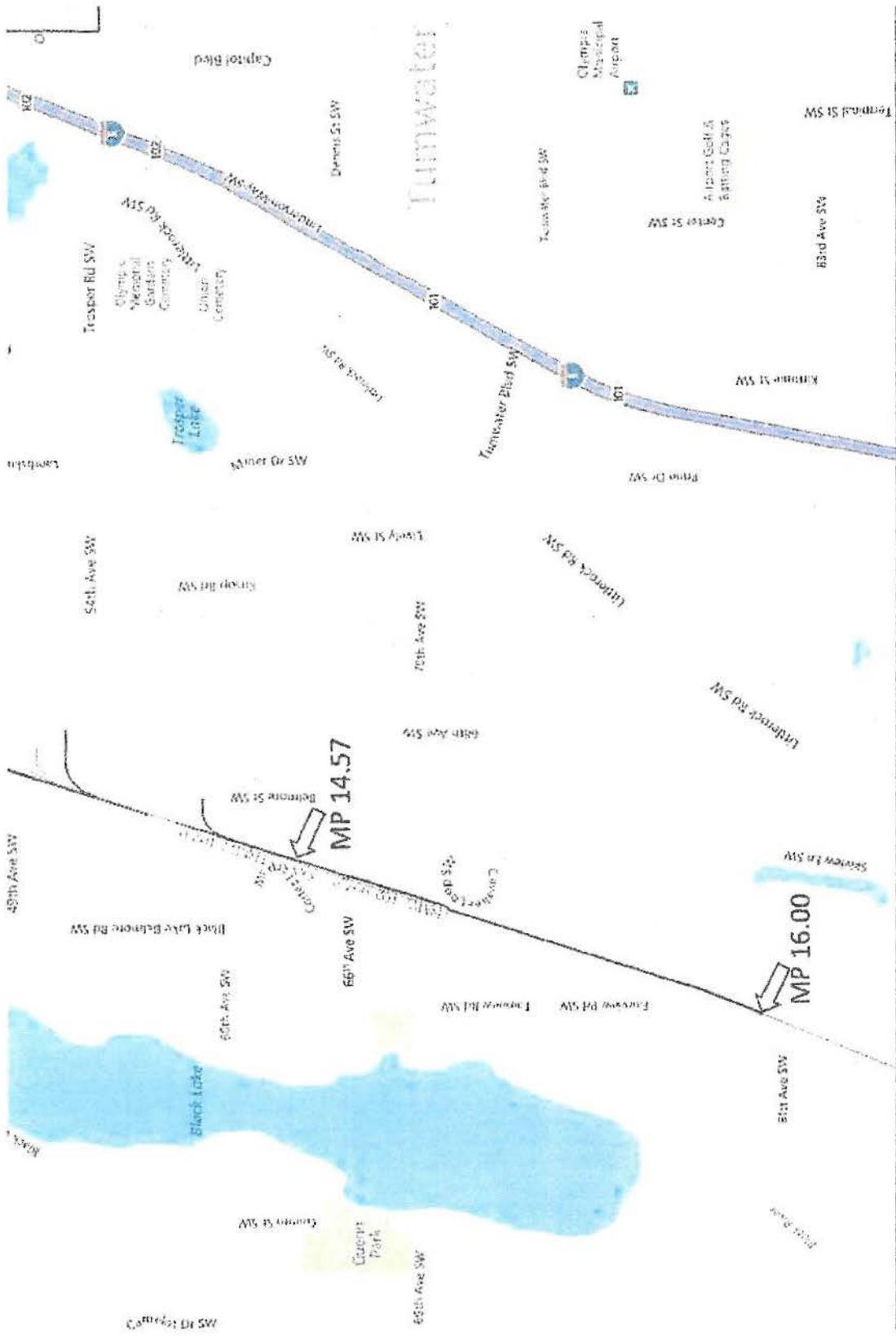
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MP 14.57

MP 16.00

Tumwater



EXHIBIT D



Emily Thompson
Paralegal
Law Department

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2500 Lou Menk Drive - AOB-3
Fort Worth, Texas 76131-2628
tel 817-352-2376
fax 817-352-2387
Email - emily.thompson@bnsf.com

July 29, 2015

Josh Baldi, Director
Department of Ecology
Northwest Regional Office
State of Washington
3190 - 160th Ave. SE
Bellevue, WA 98008-5452

**Re: STB Docket No. AB 6 (Sub-No. 492X); BNSF Railway Company -
Abandonment Exemption - in Thurston County, Washington**

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As part of the environmental report, BNSF is required to contact your agency to determine if the proposed abandonment:

1. will affect land or water uses within a designated coastal zone;
2. is consistent with applicable Federal, State or local water quality standards (with a description of any inconsistencies identified); and
3. will require permits under Section 402 of the Clean Water Act (33 U.S.C. § 1342).

For your reference I have enclosed a map of the subject railroad line. Following is information on BNSF's salvage process as it relates to this project that should also be of use:

The proposed abandonment will include the removal of the rails and ties; however, the railroad right of way, ballast and culverts will remain in place.

The salvage process begins with the unbolting of the track materials or rails. With the use of specialized machinery placed on the railroad right of way, the rails and related steel (angle bars, tie plates, spikes, switches and any other metal parts) are removed. Next the wooden ties are raised from among the ballast with a tool designed for minimum disruption of ground material. The ties are separated into three groups as follows: (1) good quality ties that will be re-used in rail service, (2) landscape-quality ties that will be re-sold to lumber dealers for landscaping and (3) scrap ties. Scrap ties are loaded into railcars and shipped by BNSF to an EPA-approved disposal site.

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fills or other material in water bodies, including inland waterways. When the salvage process is complete, waterflows in the area should not be disrupted. Finally, road crossings are removed and remediated, then repaved with gravel, asphalt or concrete, as required by governing authority. Any signals are also dismantled and removed.

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Thank you in advance for your time and contribution.

Sincerely,



Emily Thompson
Paralegal

Enclosure as stated

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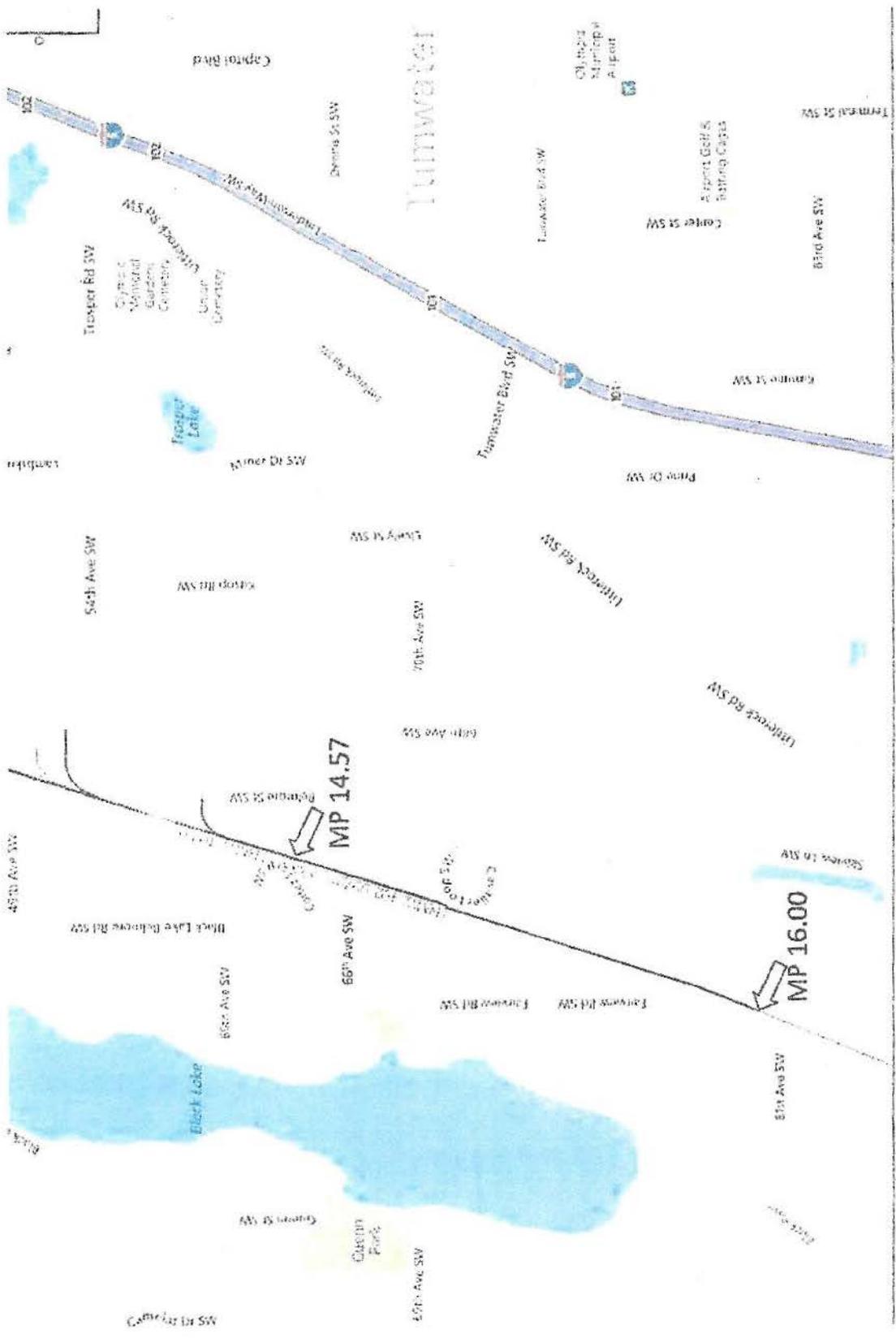


EXHIBIT E

From: [Burgdorf, Shirley](#)
To: [Thompson, Emily Jean](#)
Subject: BNSF Railway Company Abandonment Exemption in Thurston County, Washington
Date: Thursday, August 13, 2015 3:57:24 PM

Hi Emily,

The process for obtaining an official species list for your project is to go to the USFWS' Information Planning and Conservation (IPaC) website and request an Official Species List. If the project is submitted for consultation under ESA, the official species list (not the natural resources list) should be included in the information packet. The following is a list to help navigate the IPaC website.

To obtain an official species list:

1. Go to <https://ecos.fws.gov/ipac>
2. Click on Get Started
3. Begin the process by clicking on ENTER PROJECT LOCATION
4. You may type in a name of an area to zoom into, or you may skip this step and go directly to "Upload shape file", or "Select by state or county"
5. Once you are zoomed in to the area of your action, you may define the area by drawing the area, uploading a shape file, or by selecting a state or county.
6. Confirm your area
7. This brings up a page where you may view a list of all natural resources in the area or you may go directly to "Request an official species list" under the Tasks heading on the left side of the webpage.
8. Next click on REQUEST OFFICIAL SPECIES LIST.
9. Fill out the required information on this new page and click on SUMMIT OFFICIAL SPECIES LIST REQUEST at the bottom of the page.
10. An official species list will be sent to the email address entered in the step above.

If you have any questions, please contact me.
Shirley

Shirley Burgdorf
Fish & Wildlife Biologist
U.S. Fish & Wildlife Service
510 Desmond Dr. SE, Suite 102
Lacey, WA 98503
360/534-9340



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Washington Fish and Wildlife Office
510 DESMOND DRIVE SE, SUITE 102
LACEY, WA 98503
PHONE: (360)753-9440 FAX: (360)753-9405
URL: www.fws.gov/wafwo/

Consultation Code: 01EWF00-2016-SLI-0092

November 03, 2015

Event Code: 01EWF00-2016-E-00073

Project Name: Thurston County, WA rail line abandonment

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated and proposed critical habitat, and candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. The species list is currently compiled at the county level. Additional information is available from the Washington Department of Fish and Wildlife, Priority Habitats and Species website:

<http://wdfw.wa.gov/mapping/phs/> or at our office website:

http://www.fws.gov/wafwo/species_new.html. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether or not the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species, and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.). You may visit our website at <http://www.fws.gov/pacific/eagle/for> information on disturbance or take of the species and information on how to get a permit and what current guidelines and regulations are. Some projects affecting these species may require development of an eagle conservation plan: (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Also be aware that all marine mammals are protected under the Marine Mammal Protection Act (MMPA). The MMPA prohibits, with certain exceptions, the "take" of marine mammals in U.S. waters and by U.S. citizens on the high seas. The importation of marine mammals and marine mammal products into the U.S. is also prohibited. More information can be found on the MMPA website: <http://www.nmfs.noaa.gov/pr/laws/mmpa/>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Related website:

National Marine Fisheries Service:

http://www.nwr.noaa.gov/protected_species/species_list/species_lists.html

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: Thurston County, WA rail line abandonment

Official Species List

Provided by:

Washington Fish and Wildlife Office
510 DESMOND DRIVE SE, SUITE 102
LACEY, WA 98503
(360) 753-9440
<http://www.fws.gov/wafwo/>

Consultation Code: 01EWF00-2016-SLI-0092

Event Code: 01EWF00-2016-E-00073

Project Type: LAND - EASEMENT / RIGHT-OF-WAY

Project Name: Thurston County, WA rail line abandonment

Project Description: Salvage of BNSF rail line within the city streets of Thurston County, WA. Salvage will be done within railroad right-of-way.

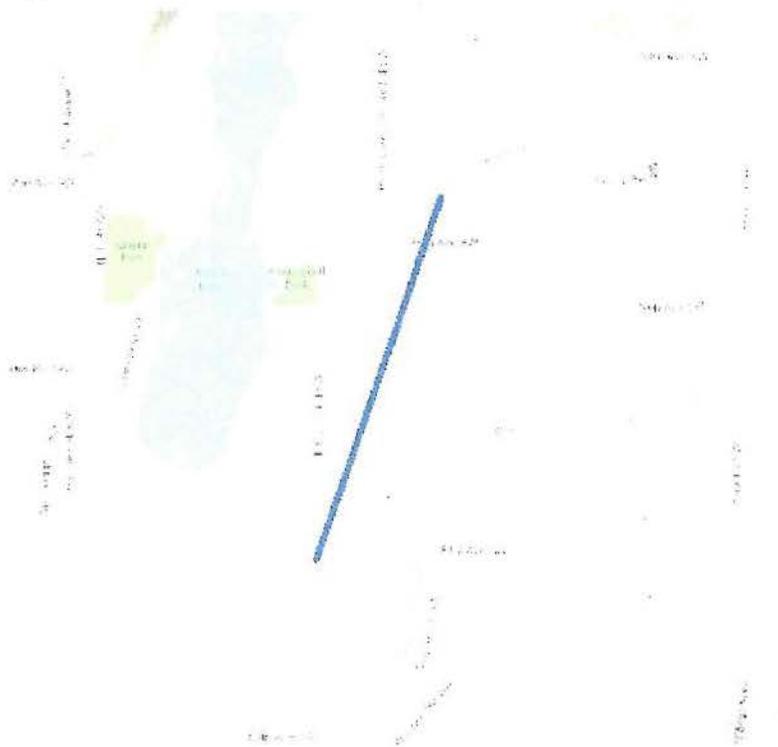
Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.



United States Department of Interior
Fish and Wildlife Service

Project name: Thurston County, WA rail line abandonment

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-122.9713070584936 46.97034076975765, -122.97138630516372 46.97027189184083, -122.9714910450636 46.97027922365661, -122.97155992298042 46.97035847032673, -122.97155259116464 46.97046321022662, -122.96094391754505 46.99173702591872, -122.96086467087493 46.991805903835534, -122.96075993097504 46.99179857201975, -122.96069105305823 46.991719325349635, -122.96069838487401 46.991614585449746, -122.9713070584936 46.97034076975765)))

Project Counties: Thurston, WA



United States Department of Interior
Fish and Wildlife Service

Project name: Thurston County, WA rail line abandonment

Endangered Species Act Species List

There are a total of 12 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Amphibians	Status	Has Critical Habitat	Condition(s)
Oregon Spotted frog (<i>Rana pretiosa</i>)	Threatened	Proposed	
Birds			
Marbled murrelet (<i>Brachyramphus marmoratus</i>) Population: CA, OR, WA	Threatened	Final designated	
Streaked Horned lark (<i>Eremophila alpestris strigata</i>)	Threatened	Final designated	
Yellow-Billed Cuckoo (<i>Coccyzus americanus</i>) Population: Western U.S. DPS	Threatened	Proposed	
Fishes			
Bull Trout (<i>Salvelinus confluentus</i>) Population: U.S.A., conterminous, lower 48 states	Threatened	Final designated	
Flowering Plants			
Golden Paintbrush (<i>Castilleja levisecta</i>)	Threatened		



United States Department of Interior
Fish and Wildlife Service

Project name: Thurston County, WA rail line abandonment

Kincaid's Lupine (<i>Lupinus sulphureus</i> <i>ssp. kincaidii</i>)	Threatened	Final designated	
Nelson's checker-mallow (<i>Sidalcea</i> <i>nelsoniana</i>)	Threatened		
Water howellia (<i>Howellia aquatilis</i>)	Threatened		
Mammals			
Olympia pocket gopher (<i>Thomomys</i> <i>mazama pugetensis</i>)	Threatened	Final designated	
Tenino pocket gopher (<i>Thomomys</i> <i>mazama tumuli</i>)	Threatened	Final designated	
Yelm pocket gopher (<i>Thomomys</i> <i>mazama yelmensis</i>)	Threatened	Final designated	



United States Department of Interior
Fish and Wildlife Service

Project name: Thurston County, WA rail line abandonment

Critical habitats that lie within your project area

The following critical habitats lie fully or partially within your project area.

Amphibians	Critical Habitat Type
Oregon Spotted frog (<i>Rana pretiosa</i>)	Proposed

EXHIBIT F



Emily Thompson
Paralegal
Law Department

BNSF Railway Company
2500 Lou Menk Drive – AOB-3
Fort Worth, Texas 76131-2828
tel 817-352-2376
fax 817-352-2397
Email -- emily.thompson@bnsf.com

July 29, 2015

U.S. Department of the Interior
Bureau of Land Management
915 Walla Walla Avenue
Wenatchee, WA 98801

**Re: STB Docket No. AB 6 (Sub-No. 492X); BNSF Railway Company –
Abandonment Exemption – in Thurston County, Washington**

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As part of the requisite environmental report, BNSF needs to know: 1) whether or not there are any endangered or threatened species, wildlife sanctuaries or refuges, or areas designated as critical habitat adjacent to or near the line, and 2) if so, what effects the proposed action may have on same.

For your reference I have enclosed a map of the subject railroad line. Following is information on BNSF's salvage process as it relates to this project that should also be of use:

The proposed abandonment will include the removal of the rails and ties; however, the railroad right of way, ballast and culverts will remain in place.

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Thank you in advance for your time and contribution.

Sincerely,



Emily Thompson
Paralegal

Enclosure as stated

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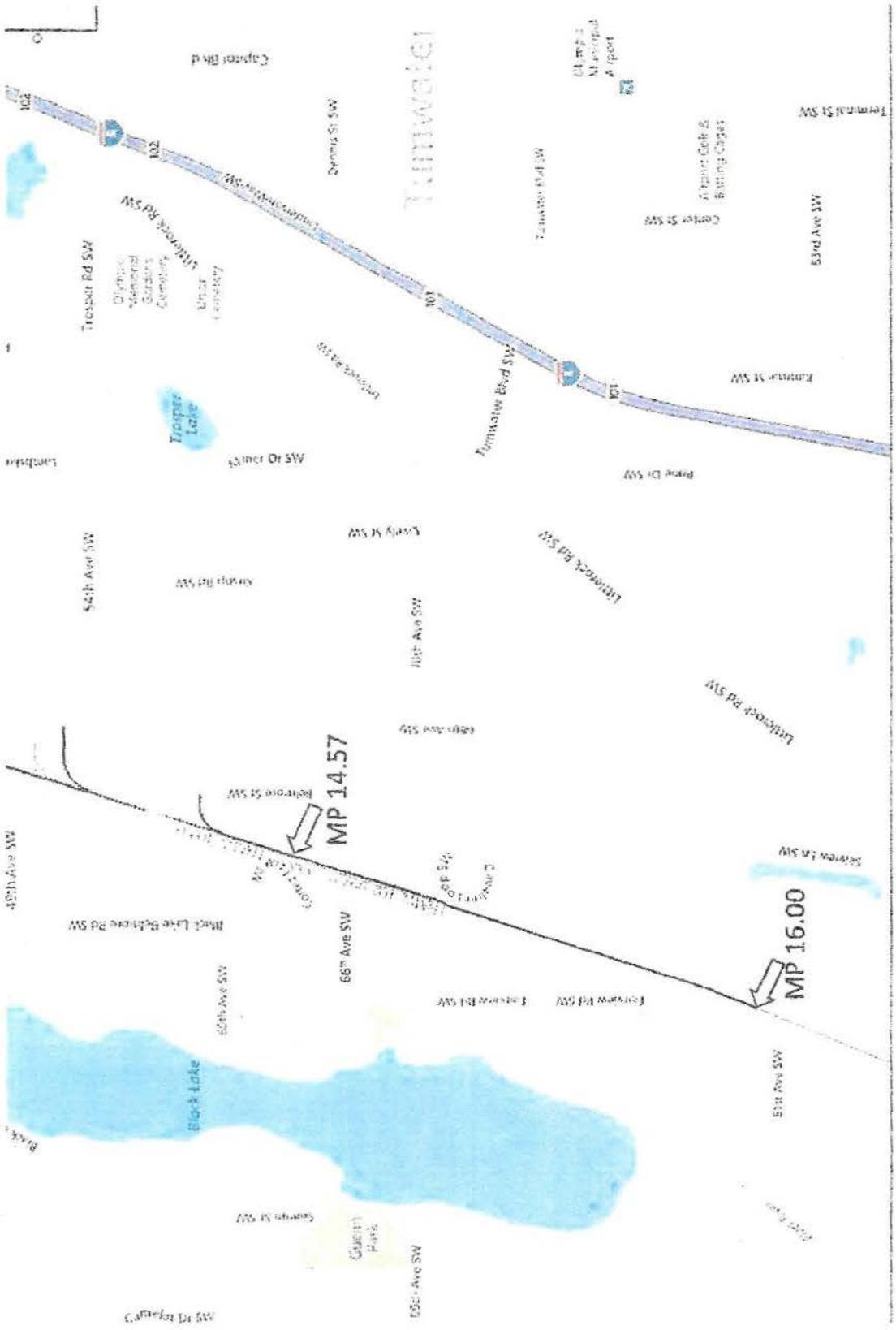


EXHIBIT G



Emily Thompson
Paralegal
Law Department

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Fort Worth, Texas 76131-2828
tel 817-352-2376
fax 817-352-2397
Email - emily.thompson@bnsf.com

July 29, 2015

Ms. Christine Lehnertz, Regional Director
National Park Service
Pacific West Region
333 Bush Street, Suite 500
San Francisco, CA 94104-2828

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As part of the requisite environmental report, BNSF needs to know: 1) whether or not there are any wildlife sanctuaries or National or State parks or forests adjacent to or near the line, and 2) if so, what effects the proposed action may have on same.

For your reference I have enclosed a map of the subject railroad line. Following is information on BNSF's salvage process as it relates to this project that should also be of use:

The proposed abandonment will include the removal of the rails and ties; however, the railroad right of way, ballast and culverts will remain in place.

The salvage process begins with the unbolting of the track materials or rails. With the use of specialized machinery placed on the railroad right of way, the rails and related steel (angle bars, tie plates, spikes, switches and any other metal parts) are removed. Next the wooden ties are raised from among the ballast with a tool designed for minimum disruption of ground material. The ties are separated into three groups as follows: (1) good quality ties that will be re-used in rail service, (2) landscape-quality ties that will be re-sold to lumber dealers for landscaping and (3) scrap ties. Scrap ties are loaded into railcars and shipped by BNSF to an EPA-approved disposal site.

The culverts, ballast and right of way will remain intact so as not to alter the prevailing waterflows along the line. In addition, BNSF salvage contractors are required to limit their activities to the width of the right of way and **not** to place fills or other material in water bodies, including inland waterways. When the salvage process is complete, waterflows in the area should not be disrupted. Finally, road crossings are removed and remediated, then repaved with gravel, asphalt or concrete, as required by governing authority. Any signals are also dismantled and removed.

BNSF salvage work for abandonments is always performed by experienced rail material salvagers and is generally bid on the open market. Each salvage contract includes detailed information on any environmental or historical conditions recommended by the Office of Environmental Analysis and imposed by the Surface Transportation Board in their final decision. Completed work is independently inspected by a BNSF roadmaster (or equal representative) to ensure compliance with BNSF standards of quality and all contractual obligations, including STB-imposed conditions, if applicable.

Please provide your assessment and comments to me at the address above, if at all possible, by October 2, 2015. You may contact me by email or telephone with any questions or concerns.

Thank you in advance for your time and contribution.

Sincerely,



Emily Thompson
Paralegal

Enclosure as stated

cc via email: Courtney Estes – BNSF – courtney.estes@bnsf.com
Tyler White – BNSF – tyler.white2@bnsf.com
Karl Morell – Karl Morell & Associates – karlm@karlmorell.com
Mark Norton – BNSF – mark.norton@bnsf.com
John Sims – BNSF – john.sims@bnsf.com

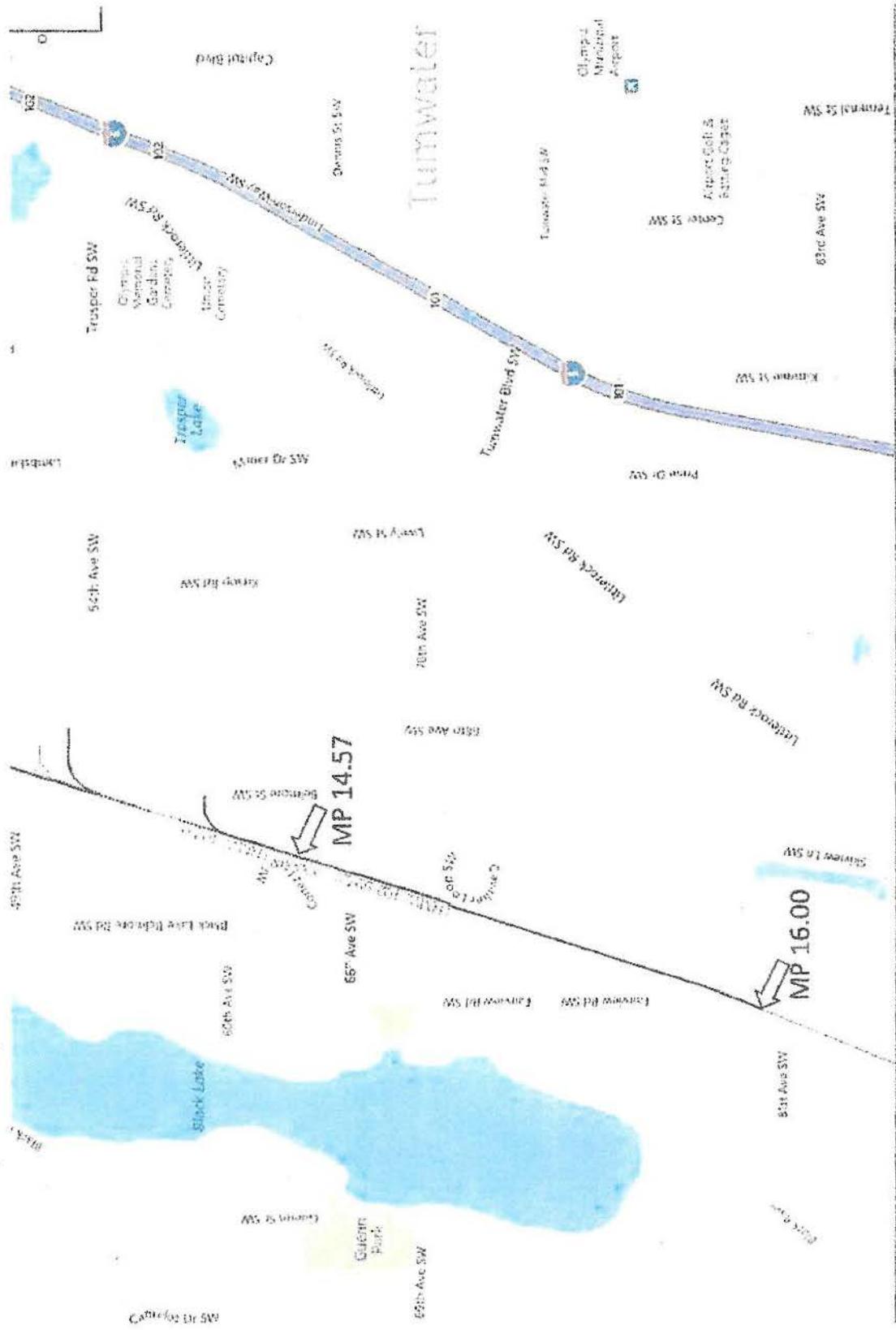


EXHIBIT H

From: [McCauley, Margaret](#)
To: [Thompson, Emily Jean](#)
Cc: [Moon, Amy \(ECY\)](#)
Subject: STB Docket No AB 6 (Sub-No. 492X); BNSF Railway Company- Abandonment Exemption Thurston County
Date: Tuesday, October 13, 2015 3:26:27 PM
Attachments: [BNSF letter.pdf](#)

Hello,

Today I received the letter you sent to EPA dated July 29, 2015. I am not sure where it has been in the interim. Reviewing the information provided and assuming the area of disturbance including support areas remains below an acre, it does not appear that the work would need to get construction storm water permit coverage.

However, as you likely have ascertained in the time since you sent the letter, the Washington State Department of Ecology is the Clean Water Act Section 402 permitting authority for this area, unless it is within tribal lands or is an action by a federal agency. I am cc'ing Amy Moon, who is a construction permit storm water administrator for Washington State.

Sincerely,

Margaret McCauley

U.S. EPA Region 10 | Office of Water & Watersheds | NPDES Permits Unit | 206-553-1772
<http://yosemite.epa.gov/r10/water.nsf/Stormwater/home>



Emily Thompson
Paralegal
Law Department

BNSF Railway Company
2500 Lou Menk Drive - AOB-3
Fort Worth, Texas 76131-2828
tel 817-352-2376
fax 817-352-2397
Email emily.thompson@bnsf.com

July 29, 2015

U.S. EPA Region 10
1200 6th Avenue, Suite 900
Seattle, WA 98101

**Re: STB Docket No. AB 6 (Sub-No. 492X); BNSF Railway Company -
Abandonment Exemption - in Thurston County, Washington**

BNSF Railway Company ("BNSF") anticipates filing in about 60 days a Notice of Exemption seeking Surface Transportation Board ("STB") authority in the above-referenced docket to abandon 1.43 miles of rail line in Thurston County, Washington, between Milepost 14.57 and Milepost 16.0.

As part of the requisite environmental report, BNSF needs to know: 1) whether or not this action will be consistent with Federal, State or local water quality standards, and 2) whether or not Section 402 and/or National Pollutant Discharge Elimination System ("NPDES") permits are required for performance of the salvage activity described below. Please note: **BNSF anticipates the proposed abandonment will not disturb more than one (1) acre of land.**

For your reference I have enclosed a map of the subject railroad line. Following is information on BNSF's salvage process as it relates to this project that should also be of use:

The proposed abandonment will include the removal of the rails and ties; however, the railroad right of way, ballast and culverts will remain in place.

The salvage process begins with the unbolting of the track materials or rails. With the use of specialized machinery placed on the railroad right of way, the rails and related steel (angle bars, tie plates, spikes, switches and any other metal parts) are removed. Next the wooden ties are raised from among the ballast with a tool designed for minimum disruption of ground material. The ties are separated into three groups as follows: (1) good quality ties that will be re-used in rail service, (2) landscape-quality ties that will be re-sold to lumber dealers for landscaping and (3) scrap ties. Scrap ties are loaded into railcars and shipped by BNSF to an EPA-approved disposal site.

The culverts, ballast and right of way will remain intact so as not to alter the prevailing waterflows along the line. In addition, BNSF salvage contractors are required to limit their activities to the width of the right of way and not to place fills or other material in water bodies, including inland waterways. When the salvage process is complete, waterflows in the area should not be disrupted.

Finally, road crossings are removed and remediated, then repaved with gravel, asphalt or concrete, as required by governing authority. Any signals are also dismantled and removed.

BNSF salvage work for abandonments is always performed by experienced rail material salvagers and is generally bid on the open market. Each salvage contract includes detailed information on any environmental or historical conditions recommended by the Office of Environmental Analysis and imposed by the Surface Transportation Board in their final decision. Completed work is independently inspected by a BNSF roadmaster (or equal representative) to ensure compliance with BNSF standards of quality and all contractual obligations, including STB-imposed conditions, if applicable.

Please provide your assessment and comments to me at the address above, if at all possible, by October 2, 2015. You may contact me by email or telephone with any questions or concerns.

Thank you in advance for your time and contribution.

Sincerely,



Emily Thompson
Paralegal

Enclosure as stated

cc via email: Courtney Estes – BNSF – courtney.estes@bnsf.com
Tyler White – BNSF – tyler.white2@bnsf.com
Karl Morell – Karl Morell & Associates – karim@karlmorell.com
Mark Norton – BNSF – mark.norton@bnsf.com
John Sims – BNSF – john.sims@bnsf.com

EXHIBIT I



Emily Thompson
Paralegal
Law Department

BNSF Railway Company
2500 Lou Menk Drive -- AOB-3
Fort Worth, Texas 76131-2828
tel 817-352-2376
fax 817-352-2397
Email - emily.thompson@bnsf.com

July 29, 2015

US Army Engineer District, Seattle
ATTN: Regulatory Branch
4735 East Marginal Way South
Seattle, WA 98134-2385

**Re: STB Docket No. AB 6 (Sub-No. 492X); BNSF Railway Company –
Abandonment Exemption – in Thurston County, Washington**

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As part of the requisite environmental report, BNSF needs to know: 1) whether or not Section 404 permits will be required for the performance of salvage activity, and 2) if the proposed abandonment will affect any 100-year floodplains or any designated wetlands. Your assessment and comments are respectfully requested. In addition, if it is your determination that floodplains will be affected please furnish, if available, 8½" x 11" black and white maps of each designated floodplain area. Please note: **BNSF does not anticipate any potential impacts to waters of the U.S. as a result of the proposed abandonment.**

For your reference a map of the subject railroad line is enclosed. Following is information on BNSF's salvage process as it relates to this project that should also be of use:

The proposed abandonment will include the removal of the rails and ties; however, the railroad right of way, ballast and culverts will remain in place.

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Please provide your assessment and comments to me at the address above, if at all possible, by October 2, 2015. You may contact me by email or telephone with any questions or concerns.

Thank you in advance for your time and contribution.

Sincerely,



Emily Thompson
Paralegal

Enclosure as stated

cc via email: Courtney Estes – BNSF – courtney_estes@bnsf.com
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Mark Norton – BNSF – mark.norton@bnsf.com
John Sims – BNSF – john.sims@bnsf.com

EXHIBIT J

MP 14.6





MP 14.6



MP 15.25



MP 15.25



MP 155

EXHIBIT K



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

November 17, 2015

Ms. Emily Thompson
BNSF Railway Company
2500 Lou Menk Drive -- AOB-3
Fort Worth, Texas 76131-2828

In future correspondence please refer to:

Log: 082415-12-STB
Property: STB Docket No. AB 6 (Sub-No. 492X), Abandonment
Re: Project Review, No Historic Properties

Dear Ms. Thompson:

Thank you for contacting our office and providing information regarding this abandonment in Thurston County, Washington. After numerous discussions with representatives from the Thurston County Public Works Department regarding the planned development of this portion of rail alignment, we have decided to forgo the need for a full cultural resources study for the purposes of abandonment. I have been assured that activities associated with abandonment will be restricted to the removal of rails and some appurtenances and that no modification of the rail corridor will occur in support of the abandonment. I have also been assured that Thurston County Public Works has agreed to complete a cultural resources survey of the entire project corridor when they convert the alignment to a bicycle/pedestrian trail in the coming years. If all of the information that I have repeated here is accurate and true, we can consider STB and BNSF's obligations under Section 106 of the National Historic Preservation Act fulfilled.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Should additional information become available, our assessment may be revised. In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and this office and the concerned tribes notified.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Matthew Sterner', with a long horizontal flourish extending to the right.

Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov

Cc: V. Rutson, Surface Transportation Board
R. Giebelhaus, Thurston County Public Works

