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241414

August 31, 2016

Cynthia T. Brown  
Chief of the Section of Administration, Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, D.C. 20423

ENTERED  
Office of Proceedings  
August 31, 2016  
Part of  
Public Record

Re: **Docket No. AB-55 (Sub-No. 750X), CSX Transportation, Inc.—  
*Discontinuance of Service Exemption—in Clay, Marion and Clinton Counties,  
IL***

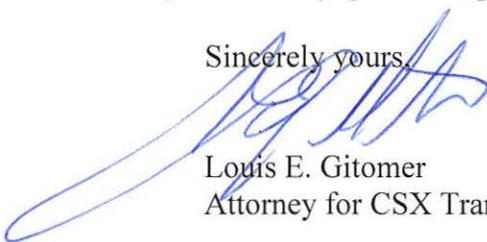
Dear Ms. Brown,

Enclosed are the original and 10 copies of a Petition for Exemption for CSX Transportation, Inc. ("CSXT") to discontinue service over an approximately 59.3-mile rail line on its Southern Region, Nashville Division, Illinois Subdivision from milepost BC 244.7 near Flora, IL, to milepost BC 304.00 near Aviston, in Clay, Marion, and Clinton Counties, IL. Also enclosed are a check for the filing fee of \$6,700 and a CD containing the Notice in WORD and pdf format.

Please time and date stamp the additional copy of this letter and return it in the self-addressed prepaid envelope.

Thank you for your assistance. If you have any questions, please contact me.

Sincerely yours,



Louis E. Gitomer  
Attorney for CSX Transportation, Inc.

Enclosure

FEE RECEIVED  
August 31, 2016  
SURFACE  
TRANSPORTATION BOARD

FILED  
August 31, 2016  
SURFACE  
TRANSPORTATION BOARD

BEFORE THE  
SURFACE TRANSPORTATION BOARD

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DOCKET NO. AB-55 (Sub-No. 750X)

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CSX TRANSPORTATION, INC.  
--DISCONTINUANCE EXEMPTION--  
IN CLAY, MARION AND CLINTON COUNTIES, IL

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PETITION FOR EXEMPTION

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Steven C. Armbrust, Esq.  
CSX Transportation, Inc.  
500 Water Street  
Jacksonville, FL 32202  
(904) 359-1229

Louis E. Gitomer, Esq.  
Melanie B. Yasbin, Esq.  
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600 Baltimore Avenue, Suite 301  
Towson, MD 21204  
(410) 296-2250  
Lou@lgrailaw.com

Attorneys for: CSX TRANSPORTATION,  
INC.

Dated: August 31, 2016

BEFORE THE  
SURFACE TRANSPORTATION BOARD

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DOCKET NO. AB-55 (Sub-No. 750X)

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CSX TRANSPORTATION, INC.  
--DISCONTINUANCE EXEMPTION--  
IN CLAY, MARION AND CLINTON COUNTIES, IL

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PETITION FOR EXEMPTION

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CSX Transportation, Inc. (“CSXT”) petitions the Surface Transportation Board (“Board”) to exempt, under 49 U.S.C. § 10502, CSXT’s discontinuance of service over an approximately 59.3-mile rail line on its Southern Region, Nashville Division, Illinois Subdivision between milepost BC 244.7 near Flora, IL, and milepost BC 304.00 near Aviston, in Clay, Marion, and Clinton Counties, IL (the “Line”), from the prior approval requirements of 49 U.S.C. § 10903.

Local traffic on the Line has fallen to two cars in 2015 and no traffic to date in 2016 and all overhead traffic has been rerouted. CSXT has kept ProBuild East, LLC (“ProBuild”), the last active shipper located on the Line, apprised of the condition of the Line and the embargo of the Line on June 10, 2016. CSXT does not believe that ProBuild will oppose the proposed discontinuance of service.

Discontinue of service over the Line will allow CSXT to avoid maintenance, inspection, and operating costs while leaving the Line in place to be reactivated in the event traffic reemerges on the Line. Rehabilitation costs will also be avoided. CSXT will not remove the track and material from the Line. CSXT recognizes that abandonment authorization is required from the Board if it decides to abandon the Line in the future.

## PROPOSED TRANSACTION

CSXT proposes to discontinue service over the an approximately 59.3-mile rail line on its Southern Region, Nashville Division, Illinois Subdivision between milepost BC 244.7 near Flora, IL, and milepost BC 304.00 near Aviston, in Clay, Marion, and Clinton Counties, IL (the “Line”). The Line traverses Zip Codes 62839, 62899, 62849, 62881, 62870, 62882, 62801, 62231, 62230, and 62216. The Line serves the stations of Kenner at milepost BC 247, Xenia at milepost BC 251, Greendale at milepost 258, Bannister at milepost BC 265, Salem at milepost 268, Odin at milepost BC 274, Shattuc at milepost 281, Ferrin at milepost BC 286, Carlyle at milepost BC 291, Beckemeyer at milepost BC 294, and Breese at milepost BC 299.

A map of the Line is attached as Exhibit A. The verified statement of Brendan Lynch, a Finance Associate for CSXT is in Exhibit B. Exhibit C contains the Federal Register notice, Exhibit D contains the certificate of publication, and Exhibit E contains the certificate of service.

CSXT is proposing to discontinue service over the Line. CSXT will not salvage the track and materials on the Line. Because CSXT is only discontinuing service and not removing the track and material, environmental and historic reports are not required. There will be no impact on historic properties. Therefore CSXT does not have to prepare or file an Historic Report. 49 C.F.R. §1105.8(a). If CSXT seeks to abandon the Line in the future, it will file the required environmental and historic reports as part of its abandonment request.

Based on information in the possession of CSXT, the Line contains the following federally granted rights-of-way between: BC 274 to BC 274.9 by Legislative Act; BC275 .2 to BC275.6 by Legislative Act; BC 280.35 to BC 281 by Legislative Act; BC 285.5 to BC 285.9 by Legislative Act; BC 292.5 to BC 293 by Legislative Act; and BC 295.5 to BC 296 by Legislative

Act. Any documentation in CSXT's possession concerning title will be made available to those requesting it.

## **BACKGROUND**

CSXT operated the Line until June 10, 2016 when the Line was embargoed because of the condition of the ties on the Line. CSXT incurred avoidable costs of \$606,599 in 2015, and projects the same losses in the forecast year and subsidy year. See Exhibit B. Exhibit B also shows opportunity costs of \$999,874 in the Forecast Year and rehabilitation costs of an additional CSXT \$7,020,000 in the Subsidy Year. Subsidy Year losses are projected to be \$8,619,929. The current level of traffic does not justify such an expenditure. However, CSXT is hopeful that traffic will return to the Line, and is therefore only seeking discontinuance authority to reduce its costs in the interim.

Before the embargo, the only commodity ProBuild shipped on the Line was lumber. ProBuild shipped two carloads in 2014, two carloads in 2015, and no carloads during the first six months of 2016. ProBuild has used alternative transportation instead of using CSXT service. IN discussions with ProBuild, CSXT does not believe that ProBuild will oppose the proposed discontinuance of service.

There is adequate alternate transportation available, which ProBuild is using. There are motor carrier options in the area. In addition, rail loading and unloading facilities are available at East St. Louis, IL.

### **C. CSXT will incur costs to maintain the Line.**

The Line is 59.3 miles in length. CSXT will continue to incur inspection and maintenance costs for the Line if service is not discontinued. In Exhibit B, Mr. Lynch has calculated the maintenance costs to be \$543,000. At two carloads per year, local traffic on the

Line has not generated enough revenue to cover the maintenance costs on the Line, much less the rehabilitation costs.

**D. Summary.**

Continued operation of the Line by CSXT will create a burden on CSXT and interstate commerce. The traffic on the Line is not sufficient to offset maintenance costs or the costs to rehabilitate the ties. There is no CSXT overhead traffic on the Line. In the Forecast Year, CSXT will incur an avoidable loss of \$1,606,473.

CSXT contends that in balancing the harm to itself and interstate commerce against the absence of harm to shippers and local interests, the balance clearly favors the discontinuance of service.

**ARGUMENT SUPPORTING THE DISCONTINUANCE OF SERVICE**

CSXT seeks an exemption under 49 U.S.C. § 10502 from the applicable requirements of 49 U.S.C. § 10903 in order to discontinue service over this lightly used 59.3-mile line of railroad.

Under 49 U.S.C. § 10502, the STB must exempt a transaction from regulation when it finds that:

(1) regulation is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101; and

(2) either:

(a) the transaction is of limited scope, or

(b) regulation is not necessary to protect customers from the abuse of market power.

The legislative history of Section 10502 reveals a clear Congressional intent that the STB should liberally use its exemption authority to free certain transactions from the administrative

and financial costs associated with continued regulation. In enacting the Staggers Rail Act of 1980, Pub. L. No. 96-488, 94 Stat. 1895, Congress encouraged the STB's predecessor agency to liberally use the expanded exemption authority under former Section 10505:

The policy underlying this provision is that while Congress has been able to identify broad areas of commerce where reduced regulation is clearly warranted, the Commission is more capable through the administrative process of examining specific regulatory provisions and practices not yet addressed by Congress to determine where they can be deregulated consistent with the policies of Congress. The conferees expect that, consistent with the policies of this Act, the Commission will pursue partial and complete exemption from remaining regulation.

H.R. Rep No. 1430, 96 the Cong. 2d Sess. 105 (1980). See also *Exemption From Regulation--Boxcar Traffic*, 367 I.C.C. 424, 428 (1983), vacated and remanded on other grounds, *Brae Corp. v. United States*, 740 F.2d 1023 (D.C. Cir 1984). Congress reaffirmed this policy in the conference report accompanying the ICC Termination Act of 1995, Pub. L. No. 104-88, 109 Stat. 803, which re-enacted the rail exemption provision as Section 10502. H.R. Rep. No. 422, 104th Cong., 1st Sess. 168-69 (1995).

**A. The Application of 49 U.S.C. § 10903 Is Not Necessary to Carry Out the Rail Transportation Policy**

Detailed scrutiny of this transaction is not necessary to carry out the rail transportation policy. An exemption would minimize the unnecessary expenses associated with the preparation and filing of a formal discontinuance of service application, expedite regulatory decisions and reduce regulatory barriers to exit. 49 U.S.C. § 10101 (2) and (7). Since there has been no local traffic on the Line in 2016, even prior to the embargo, the discontinuance of service by CSXT will result in no loss of rail service. Two carloads per year on a 59.3-mile line is insufficient to cover the costs of operating and maintaining the Line.

Granting this exemption, therefore, fosters sound economic conditions and encourages efficient management by permitting the rationalization of an unnecessary rail line. 49 U.S.C. §10101 (3), (5) and (9). “An exemption would also foster sound economic conditions and encourage efficient management by relieving [the railroad] of the out-of-pocket expenses ... associated with retaining the underutilized line [49 U.S.C. 10101(5) and (9)].”<sup>1</sup>

Other aspects of the rail transportation policy are not adversely affected. For example, competition and the continuation of a sound rail transportation system are not affected since the public will not be deprived of any needed rail services.

Finally, CSXT is not abandoning the Line. It is discontinuing service to reduce the burden on CSXT of between \$600, 055 (Base Year Avoidable Loss) and \$8,619,929 (Estimated Subsidy Year Loss from Operations. See Exhibit B. A discontinuance of service will leave the track and assets available to be reactivated. CSXT recognizes that it cannot remove the track and

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<sup>1</sup> *Georgia Southwestern Railroad, Inc.—Abandonment and Discontinuance Exemption—in Harris and Meriwether Counties, GA*, STB Docket No. AB-1000 (Sub-No. 1X) (STB served December 10, 2007) at 3.

material on the Line and abandon the Line until it applies for and receives authority from the Board.

**B. This Transaction Is Of Limited Scope**

The proposed transaction is of limited scope. CSXT seeks to discontinue service over its 59.3-mile line in three counties in Illinois. Additionally, the limited use made of the Line, demonstrates the limited scope of CSXT's proposed discontinuance.

**C. This Transaction Will Not Result In An Abuse Of Market Power**

There is no overhead freight traffic on the Line. ProBuild, the only customer on the Line, has alternate transportation service available, whether it is through a transload facility offered by CSXT or motor carrier service.

Discontinuance of service over the Line will not leave ProBuild without reasonable transportation alternatives since it is using those alternatives today. With transportation alternatives available, CSXT's discontinuance of service over the Line will not result in an abuse of market power.

**FEDERAL REGISTER NOTICE**

A draft Federal Register notice is attached hereto as Exhibit C.

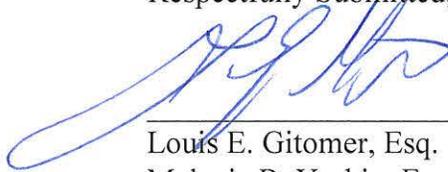
**LABOR PROTECTION**

The interests of railroad employees of CSXT who may be adversely affected by the proposed discontinuance of service will be adequately protected by the labor protective conditions in *Oregon Short Line R. Co.--Abandonment--Goshen*, 360 I.C.C. 91 (1979).

## CONCLUSION

Application of the regulatory requirements and procedures of 49 U.S.C. § 10903 is not required to carry out the rail transportation policy set forth in 49 U.S.C. § 10101, as previously shown. Nor is STB regulation required to protect customers from the abuse of market power. Moreover, this discontinuance of service is of limited scope. Accordingly, CSXT respectfully requests the STB to grant the proposed discontinuance of service of the 59.3-mile Line.

Respectfully Submitted,



Steven C. Armbrust, Esq.  
CSX Transportation, Inc.  
500 Water Street  
Jacksonville, FL 32202  
(904) 359-1229

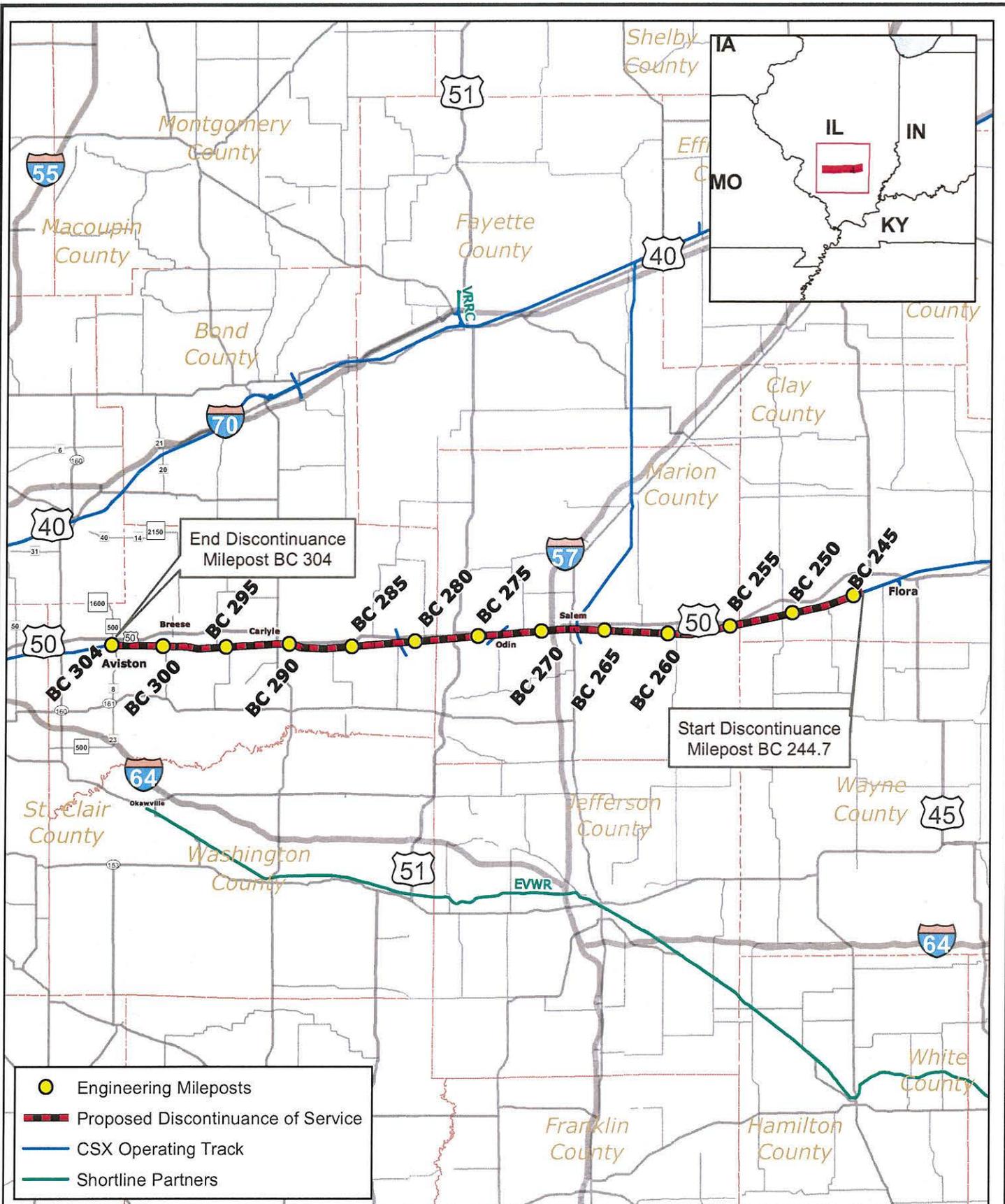
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Louis E. Gitomer, Esq.  
Melanie B. Yasbin, Esq.  
Law Offices of Louis E. Gitomer, LLC  
600 Baltimore Avenue, Suite 301  
Towson, MD 21204  
(410) 296-2250  
Lou@lgraillaw.com

Attorneys for: CSX TRANSPORTATION,  
INC.

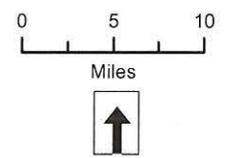
Dated: August 31, 2016

# EXHIBIT A-Map



**CSX Transportation, Inc.**  
**Proposed Discontinuance of Service**  
**Clay, Marion, and Clinton Counties, IL**

Milepost BC 244.7 to BC 304  
 Total Distance of approx. 59.3 Miles  
 Nashville Division - Illinois Subdivision  
 STB Docket No. AB 55 (Sub-No. 750X)



**EXHIBIT B-**  
**Verified Statement of Mr. Lynch**



Jacksonville, FL 8/11/2016

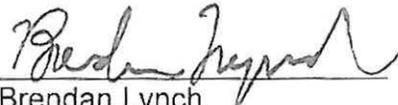
Re: Net Rat File IL 308A – CSXT Proposed Abandonment – Southern Region, Nashville Division, Illinois Subdivision from Railroad Milepost BC 244.7 near Flora IL to Railroad Milepost BC 304.00 Near Aviston a distance of approximately 59.3 miles in Clay, Marion and Clinton Counties, Illinois. STB Docket Number AB 55 (Sub No. 750X)

In preparation for filing a Petition for Exemption on the above-referenced line segment, listed below are the carloads handled over the line for the years 2014, 2015 and 2016.

<u>PATRON</u>	<u>STATION</u>	<u>COMMODITY</u>	<u>CARLOADS</u>		
			<u>2014</u>	<u>2015</u>	<u>2016</u>
ProBuild East LLC Michael Nance, General Manager 8120 Old US Highway 50 Breese, IL 62230	43150	Lumber	2	2	0

An embargo was placed on the rail line that serves the above customer effective June 10, 2016 due to tie conditions. Non-rail transportation options available to the customer include motor carriers that serve the area. In addition, rail loading and unloading facilities are available at East St. Louis Illinois.

There are no defense installations served by this line or in the immediate vicinity.

  
 \_\_\_\_\_  
 Brendan Lynch  
 Finance Associate  
 CSX Transportation

SUBSCRIBED AND SWORN TO before me this 8 day of August, 2016.

My Commission Expires: 9-11-2016

  
 \_\_\_\_\_  
 Notary Public



## CSX Transportation, Inc.

Line Segment: Illinois Sub Discontinuance of Service

	Most recent historic year	Forecast year	Subsidy year
	2015	2016	2015
<u>Carloads</u>	2	0	2
<u>Revenues Attributable</u>			
1. Freight Originated &/or Terminated On Branch			
a. CSX	\$6,544	\$0	\$6,544
2. Bridge Traffic	\$0	\$0	\$0
3. All Other Revenue and Income	\$0	\$0	\$0
4. Total Revenues Attributable (Lines 1 thru 3)	\$6,544	\$0	\$6,544
<u>Avoidable Costs</u>			
5. Total On-Branch Costs (Lines 5a thru 5k)	\$605,370	\$605,370	\$605,370
a. Maintenance of Way and Structures	\$543,000	\$543,000	\$543,000
b. Maintenance of Equipment - Locomotives	\$2,500	\$2,500	\$2,500
c. Transportation	\$1,870	\$1,870	\$1,870
d. Joint Facilities	\$0	\$0	\$0
e. Deadheading, Taxi and Hotel	\$0	\$0	\$0
f. Overhead Movement	\$0	\$0	\$0
g. Freight Car Costs (o/t Return on Freight Cars)	\$0	\$0	\$0
h. Return on Value - Locomotives	\$0	\$0	\$0
i. Return on Value - Freight Cars	\$0	\$0	\$0
j. Revenue Taxes	\$0	\$0	\$0
k. Property Taxes	\$58,000	\$58,000	\$58,000
6. Total Off-Branch Costs (Lines 6a and 6b)	\$1,229		\$1,229
a. Off-Branch Costs (o/t Return on Freight Cars)	\$1,229		\$1,229
b. Return on Value - Freight Cars			
7. Total Avoidable Costs (Lines 5 and 6)	\$606,599	\$606,599	\$606,599
<u>Subsidization Costs</u>			
8. Rehabilitation	xxxx	xxxx	\$7,020,000
9. Administration Costs	xxxx	xxxx	
10. Casualty Reserve Account	xxxx	xxxx	
11. Total Subsidization Costs (Lines 8 thru 10)	xxxx	xxxx	\$7,020,000
<u>Return on Value</u>			
12. Valuation of Property (Lines 12a thru 12c)	xxxx	\$11,611,727	\$11,611,727
a. Working Capital	xxxx	\$24,878	\$24,878
b. Income Tax Consequences	xxxx	(\$7,101,617)	(\$7,101,617)
c. Net Liquidation Value	xxxx	\$18,688,465	\$18,688,465
13. Nominal Rate of Return	xxxx	\$0	\$0
14. Nominal Return on Value (Line 12 * Line 13)	xxxx	\$1,100,792	\$1,100,792
15. Holding Gain (Loss)	xxxx	\$100,918	\$100,918
16. Total Return on Value (Line 14 less Line 15)	xxxx	\$999,874	\$999,874
17. Avoidable Loss from Operations (Line 7 less Line 4)	\$600,055	\$606,599	\$600,055
18. Estimated Forecast Year Loss from Operations (Lines 4 , less 7&16)		(\$1,606,473)	
19. Estimated Subsidy Year Loss from Operations (Lines 4 less Line7,11,16)			(\$8,619,929)

**EXHIBIT C**  
**Federal Register Notice**

CSX TRANSPORTATION, INC.— DISCONTINUANCE OF SERVICE EXEMPTION—  
IN CLAY, MARION AND CLINTON COUNTIES, IL

Notice of Petition for Exemption to Discontinue Service

On August 31, 2016 CSX Transportation, Inc. (“CSXT”) filed with the Surface Transportation Board, Washington, D.C. 20423, a petition for exemption for the discontinuance of service over a 59.3-mile rail line on its Southern Region, Nashville Division, Illinois Subdivision from milepost BC 244.7, near Flora, IL, to milepost BC 304.00, near Aviston, in Clay, Marion, and Clinton Counties, IL, all of which traverses through United States Postal Service ZIP Codes 62839, 62899, 62849, 62881, 62870, 62882, 62801, 62231, 62230, and 62216 (the “Line”). The Line for which the discontinuance of service exemption request was filed includes the following stations: Kenner at milepost BC 247, Xenia at milepost BC 251, Greendale at milepost 258, Bannister at milepost BC 265, Salem at milepost 268, Odin at milepost BC 274, Shattuc at milepost 281, Ferrin at milepost BC 286, Carlyle at milepost BC 291, Beckemeyer at milepost BC 294, and Breese at milepost BC 299.

Based on information in the possession of CSXT, the Line contains the following federally granted rights-of-way between: BC 274 to BC 274.9 by Legislative Act; BC275 .2 to BC275.6 by Legislative Act; BC 280.35 to BC 281 by Legislative Act; BC 285.5 to BC 285.9 by Legislative Act; BC 292.5 to BC 293 by Legislative Act; and BC 295.5 to BC 296 by Legislative Act.

Any documentation in the railroad’s possession will be made available promptly to those requesting it.

The interest of railroad employees of CSXT will be protected by *Oregon Short Line R. Co.—Abandonment—Goshen*, 360 I.C.C. 91 (1979).

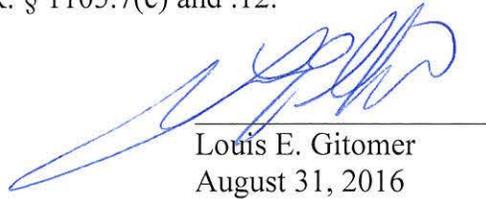
Any offer of financial assistance will be due no later than 10 days after service of a decision granting the petition for exemption.

Persons seeking further information concerning discontinuance of service procedures may contact the Surface Transportation Board or refer to the full discontinuance regulations at 49 CFR Part 1152.

# EXHIBIT D

## CERTIFICATE OF PUBLICATION

The undersigned hereby certifies that notice of the proposed abandonment in Docket No. AB-55 (Sub-No. 750X) in the following form was advertised on August 30, 2016, in the Advocate-Press, a newspaper of general circulation in Clay County, IL, and on August 31, 2016, in The Belleville News-Democrat, a newspaper of general circulation in Marion and Clinton Counties, IL, as required by 49 C.F.R. § 1105.7(c) and .12.



Louis E. Gitomer  
August 31, 2016

CSX Transportation, Inc. (“CSXT”) gives notice that on or about August 31, 2016, it intends to file with the Surface Transportation Board, Washington, DC 20423, a petition for exemption under 49 U.S.C. 10502 from the prior approval requirements of 49 U.S.C. 10903, et seq., permitting CSXT to discontinue service over an approximately 59.3-mile rail line on its Southern Region, Nashville Division, Illinois Subdivision from milepost BC 244.7, near Flora, IL, to milepost BC 304.00, near Aviston, which traverses United States Postal Service ZIP Codes 62839, 62899, 62849, 62881, 62870, 62882, 62801, 62231, 62230, and 62216 in Clay, Marion, and Clinton Counties, IL (the “Line”). The proceeding has been docketed as No. AB-55 (Sub-No. 750X).

The Board’s Office of Environmental Analysis (“OEA”) will generally prepare an Environmental Assessment (“EA”), which will normally be available 60 days after the filing of the petition for abandonment exemption. Comments on environmental and energy matters should be filed no later than 30 days after the EA becomes available to the public and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to OEA, Surface Transportation Board, Washington, DC 20423 or by calling OEA at 202-245-0295.

Appropriate offers of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance) must be filed directly with the Board’s Section of Administration, Office of Proceedings, 395 E Street, SW, Washington, DC 20423 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicant’s representative [See 49 CFR 1104.12(a)]. Questions regarding offers of financial assistance may be directed to the Board’s Office of Public Assistance, Governmental Affairs, and Compliance at 202-245-0233. Copies of any comments or requests for conditions should be served on the applicant’s representative: Louis E. Gitomer, Law Offices of Louis E. Gitomer, LLC, 600 Baltimore Avenue, Suite 301, Towson, MD 21204, 410-296-2250, email at Lou@lgraillaw.com.

# EXHIBIT E

## CERTIFICATE OF SERVICE

Pursuant to 49 C.F.R. § 1152.50 (d) (1), the undersigned hereby certifies that a copy of this Petition for Exemption in Docket No. AB-55 (Sub-No. 750X) was mailed via first class mail on August 31, 2016, to the following parties:

### State Public Service Commission

Illinois Commerce Commission  
Railroad Transportation  
Leland Building  
527 East Capitol Ave,  
Springfield, IL 62701

### Military Traffic Management Command

Headquarters  
Military Surface Deployment and Distribution Command  
Transportation Engineering Agency  
ATTN: SDTE-SA (Railroads for National Defense)  
1 Soldier Way, Building 1900W  
Scott AFB, IL 62225

### National Park Service

Mr. Rick Potts  
Chief, Conservation and Outdoor Recreation Division  
Rivers, Trails and Conservation Assistance Program National Park Service  
1849 C Street, N.W. (Org Code 2220)  
Washington, DC 20240

### National Park Service

U.S. Department of Interior  
National Park Service  
Land Resources Division  
1849 C Street, N.W.  
Washington, DC 20240

U.S. Department of Agriculture

U.S. Department of Agriculture  
Chief of the Forest Service  
1400 Independence Avenue, S.W.  
Washington, DC 20250-0003



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Louis E. Gitomer  
August 31, 2016