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ENVIRONMENTAL MATERIALS

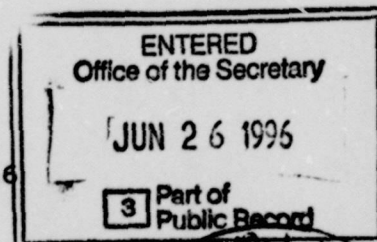
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KECK, MAHIN & CATE

FILE NUMBER Z9990-005

DIRECT DIAL (202) 789-8931

February 15, 1996



Elaine K. Kaiser
Chief, Section of Environmental Analysis
Surface Transportation Board
1201 Constitution Avenue, N.W., Room 3219
Washington, D.C. 20423

Re: F.D. No. 32760 UP-SP Merger Application
Environmental Analysis Project.

Dear Ms. Kaiser:

This will update you on the status of investigations presently being undertaken by the State of Nevada in general, and the City of Reno in particular, to assess the potential for adverse effects to the environment, as well as to public health and safety, as a result of the proposed merged operations of the Union Pacific and Southern Pacific.

The State of Nevada through the Nevada Department of Transportation (NDOT) and the Nevada Public Service Commission (NPSC) has filed Notice of Intent to Participate. NDOT has undertaken review of various aspects of proposed rail operations. NPSC has scheduled public hearings in Reno - February 12; in Lovelock - February 13, in Winnemucca - February 14, and in Las Vegas - February 15. The first three meetings involve northern Nevada communities along the Central Corridor/Overland Route, the last meeting involves southern Nevada. A copy of the NPSC notice is attached as Item 1.

The City of Reno has also filed Notice of Intent to Participate. As you may know, the SP line segment between Roseville, CA and Ogden, UT bisects the City of Reno, generally, and its downtown business and hotel/casino district, specifically. The line divides the City, separating schools, hospitals, business and residential areas. Thus, education, commerce, housing and health care activities require crossing the rail line. The current impact of SP rail operations on environment, public health and safety will be dramatically

Item No. _____

Page Count 59

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A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

CHICAGO, ILLINOIS HOUSTON, TEXAS LOS ANGELES, CALIFORNIA NEW YORK, NEW YORK
PEORIA, ILLINOIS SAN FRANCISCO, CALIFORNIA OAKBROOK TERRACE, ILLINOIS SCHAUMBURG, ILLINOIS

KECK, MAHIN & CATE

Elaine K. Kaiser
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Page 2

altered and surely aggravated in the future as a result of the proposed merged UPSP operations.

The merger applicants apparently intend to enhance the Central Corridor/Overland Route to improve transit times and distances between northern California and the Midwest (Chicago, St. Louis and Kansas City). Construction improvements in the Roseville Yard and the Sierra Nevada Mountains combined with directional changes propose to shorten routing by almost 400 miles.

The proposed merged operations will almost double the train frequency (from 13 to 23 trains/day) through the downtown Reno hotel/casino district. Tonnage is projected to increase some 67%, with intermodal and automotive traffic being the focus.

The BNSF trackage rights agreement anticipates access and utilization of the Central Corridor/Overland Route as well. Including BNSP and Amtrak trains, the total projected train frequency will increase to over 30 trains per day, not including local service.

Reno's principal business is tourism. Downtown is the primary location for hotels and casinos. Of the 15 at-grade crossings in the City, 8 are downtown. The local traffic using the at-grade crossings at each block involves substantial pedestrian and vehicular traffic, not to mention fire, police and ambulance equipment.

Using either the UP 8,000 foot standard train length or the SP current 6,000 foot length, it becomes evident that at-grade crossings along a mile of line would be impacted by one train.

Environmental impacts on air quality, congestion and noise levels as a result of the proposed merger are under study. The recent opening of a 2,000 room hotel little more than 1/2 block from the rail line adds substantial number of noise receptor sites. The significant level of pedestrian traffic is also under study.

I am enclosing a preliminary report of the City of Reno's investigation as Item No. 2. The Executive Summary from a recent Traffic Study Report is attached as Item 3.

Given the STB's procedural schedule constraints on time available for assessment, I thought it appropriate to share these

KECK, MAHIN & CATE

Phyllis K. Kaiser
February 15, 1996
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early reports. Final Report and Comments will be filed as soon as practicable to aid your evaluation and assessment.

Very truly yours,

Paul E. Lamboley

PHL/ss
Enclosures

ITEM 1

BOB MILLER
Governor

STATE OF NEVADA
PUBLIC SERVICE COMMISSION OF NEVADA

Grant Sawyer State Office Building
888 E. Washington Avenue, Room 4800
Las Vegas, Nevada 89101
(702) 486-2830

Commissioners:
JOHN P. MENDOZA
Chairman

JO ANN KELLY
GALEN S. DENIO
JUDY M. SHELDREW
DONALD L. SODERBERG



TIMOTHY HAY
Counsel

WILLIAM M. VANCE
Secretary

FOR IMMEDIATE RELEASE
February 8, 1988

Contact: Michael Campbell
486-2637

PUBLIC MEETINGS ON PENDING UNION PACIFIC-SOUTHERN PACIFIC MERGER

The Nevada Public Service Commission is holding public meetings next week throughout Nevada on the proposed merger between Union Pacific and Southern Pacific rail corporations.

There will be public meetings in Reno on Feb. 12, in Lovelock on February 13, in Winnemucca on Feb. 14, and in Las Vegas on February 15.

The rail corporations' application is now pending before the U.S. Department of Transportation's Surface Transportation Board, and the PSC has filed a letter of intent to be an active participant in their application.

"The purpose of each public meeting is to provide an opportunity for the public to offer comments on the proposed merger so that the Commission is adequately informed in order to participate," said Commissioner Galen Denio.

Each public meeting may also include presentations by the applicant railroads and interested entities. The public comments and the presentations may include discussion of operational plans and changes, environmental effects, crossing safety, and impacts on shipping.

The meeting in Reno on Feb. 12 starts at 6 p.m. on the second floor of the Peppermill Hotel and Casino. The meeting in Lovelock on Feb. 13 starts at 5 p.m. in the Rochester Room of the Pershing County Community Center.

The meeting in Winnemucca on Feb. 14 starts at 6 p.m. in the Jackson Mountain Room of the Winnemucca Convention Center. The meeting in Las Vegas on Feb. 15 starts at 6 p.m. in the PSC offices in the Sawyer State Office Building.

BEFORE THE PUBLIC SERVICE COMMISSION OF NEVADA

NOTICE OF PUBLIC MEETINGS

On November 30, 1995, Union Pacific Corporation, Union Pacific Railroad Company, Missouri Pacific Railroad Company, Southern Pacific Rail Corporation, Southern Pacific Transportation Company, Saint Louis Southwestern Railway Company, STCSL Corporation, and The Denver and Rio Grande Western Railroad Company filed an application with the Interstate Commerce Commission ("ICC").

That application seeks approval and authorization under 49 U.S.C. 11343 to 49 U.S.C. 11345, inclusive, for (1) the acquisition of control of Southern Pacific Rail Corporation by Union Pacific Acquisition Corporation, an indirect wholly owned subsidiary of Union Pacific Corporation; (2) the merger of Southern Pacific Rail Corporation into Union Pacific Railroad Company; and (3) the resulting common control of Union Pacific and Southern Pacific by Union Pacific Corporation.

The application was designated by the ICC as Finance Docket No. 32760. After the filing of the application, the responsibilities for reviewing the application have been transferred by federal law under the ICC Termination Act of 1995 from the ICC to the Surface Transportation Board of the United States Department of Transportation. Finance Docket No. 32760 is now pending before the Surface Transportation Board.

The Public Service Commission of Nevada ("Commission") has filed a letter of intent to be an active participant in Finance Docket No. 32760. The Commission will hold public meetings to receive comments and information to assist in its participation in Finance Docket No. 32760 as follows:

MONDAY, FEBRUARY 12, 1996

The Peppercorn, 2nd floor
2707 South Virginia Street
Reno, Nevada
6 p.m.

TUESDAY, FEBRUARY 13, 1996

Rochester Room
Pershing County Community Center
820 Sixth Street
Lovelock, Nevada
6 p.m.

WEDNESDAY, FEBRUARY 14, 1996

Jackson Mountain Room
Winnemucca Convention Center
30 West Winnemucca Boulevard
Winnemucca, Nevada
6 p.m.

THURSDAY, FEBRUARY 15, 1996

Office of the Public Service Commission
The Sawyer Building
333 East Washington Avenue, 4th floor
Las Vegas, Nevada
6 p.m.

The purpose of each public meeting will be to provide an opportunity for the public to offer comments on the proposed merger so that the Commission would be adequately informed in order to participate in Finance Docket No. 32760. Each public meeting may also include presentations by the applicant railroads and interested entities. The public comments and the presentations may include discussion of operational plans and changes, environmental effects, crossing safety, and impacts on shipping.

By the Commission,

William H. Vance
WILLIAM H. VANCE, Commission Secretary

Dated:

Cannon City, Nevada

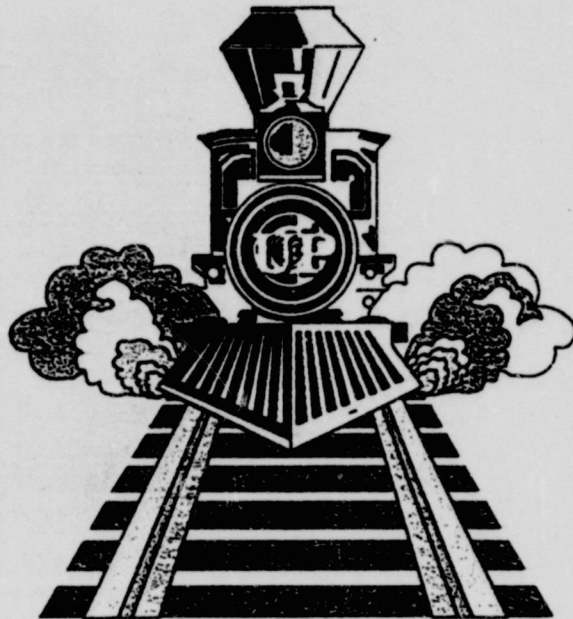
1/26/96

ITEM 2

CITY OF RENO

FACT FINDING REPORT

Railroad Merger Study



DRAFT
DATE

February 1996

NA NOLTE and ASSOCIATES, Inc.
Engineers / Planners / Surveyors
KH KLEINFELDER

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1.0 Introduction

In the summer of 1995 the Union Pacific Corporation (UP) announced that it had reached agreement with and would acquire the Southern Pacific Corp. (SP). On November 30, 1995, they filed an application with the Interstate Commerce Commission (ICC) for approval of this merger. In December, 1995, the City of Reno (City) retained the services of Nolte and Associates (Nolte) along with Kleinfelder Associates to perform this study on the UP/SP merger.

2.0 Project Approach

Our team started this project by meeting with the City, railroad personnel, local engineering professionals, legal experts, and in-house railroad specialists. We gathered information on past, present, and future surface transportation issues related to the railroad through Reno. Our team examined historical data, reviewed the UP/SP merger application, and developed estimates on the rail traffic changes. The objective of this study was to determine the pertinent facts surrounding the effects of this merger on the City and assist the City in establishing their position on the merger. The study team was also to be available to provide a verified statement if needed. This report summarizes, in draft form, these findings and estimates.

3.0 Railroad Operations through Downtown Reno

Railroad operations through northern Nevada utilize two main line routes. The first is the UP's line from Sacramento to Winnemucca via the Feather River canyon. The second is the SP route from Roseville through Reno and Winnemucca via the Donner pass. The SP route is at least 136 miles¹ shorter than the UP route between Oakland and Salt Lake City, saving an estimated two crews per train between those points. The UP line consists of single track with maximum 1.5% grade, while the SP line is double track with maximum 2.6% grade. The gradient of the SP track through downtown Reno ranges from 0.28% to 0.84% downward to the east². The UP route is cleared for maximum-height double-stacked containers while the SP route is not³. Appendix A contains route maps and track charts illustrating these lines.

Union Pacific accesses Reno via its Reno Branch. This branch connects to the UP main line at Reno Junction about 28 miles north of UP's yard at their station of North Reno and 33 miles north of downtown Reno. The North Reno yard consists of 4 tracks, 2 used for intermodal

¹ ICC Finance Docket No. 32760, Railroad Merger Application, Volume 3, Attachment 13-6, Pages 378, 384, and 385.

² SP Main Line Track Profile Plan, Section V-1/P-5.

³ The merger application indicates the costs of increasing overhead clearances on SP's route to be \$18 million. A similar program was completed on UP's route around 1990.

loading and 2 for manifest storage and switching⁴. North Reno also contains the local UP intermodal facility (trailers and containers on flat cars). Appendix A also contains a UP diagram illustrating these tracks.

3.1. Current SP Reno Operations

Reno is located on the Roseville Subdivision of the SP at Mile Post (MP) 242.8. Two main tracks pass through downtown Reno, identified as No. 1 for westward trains and No. 2 for eastward. Established train operating rules mandate maximum train speeds of 20 mph for both passenger and freight between MP 243.2 and MP 242.0 as locomotives pass through these limits. The maximum authorized westward speed through downtown after locomotives have passed through these limits is 45 mph for passenger trains and 40 mph for freight trains. The eastward maximum authorized speed for passenger and freight trains is 25 mph due to the Sparks yard.

Presently, Amtrak operates 4 trains east and 4 trains west through Reno each week. These trains are generally about 1,200 to 1,500 feet long including locomotives. Reno is a regular station stop for intercity passenger trains.

Approximately 13 freight trains⁵ presently operate through Reno. SP train density records from 1994 validate this number. These trains consist of expedited automobile, intermodal, manifest (box car), unit grain, and coal trains operating 24 hours per day, seven days per week. Train lengths vary depending on train type, tonnage, and commodity. Auto and intermodal trains are generally 5,000 to 6,000 feet long and are operated at faster speeds than the heavier, longer manifest and unit trains. The manifest trains can range from 5,000 to 8,000 feet long and are much heavier. Unit grain and coal trains usually operate with 65 to 75 cars and approximately 7,500 to 10,000 tons at lengths from 5,000 to over 6,000 feet.

An actual 24-hour lineup of trains through Reno on January 19, 1996, showed 15 trains. The same lineup on January 22, 1996, showed a total of 14 trains. Neither of these lineups showed the daily switch engine that travels from Sparks to West Reno and back approximately once each day. These trains included all categories of passenger and freight operating over Donner Summit.

Southern Pacific conducts its yard and intermodal operations at its terminal in Sparks. SP's Sparks yard consists of 16 tracks with a holding capacity of 800 cars plus a small intermodal facility (trailers and containers on flat cars). The Sparks terminal is served by 4 yard engines spread around the clock. Up to two local trains operate east out of Sparks daily. The SP

⁴ UP-SP Common Point Team #3 report on Area #6.

⁵ This number was generated from an analysis of SP train density records showing train traffic through Reno on two representative days in 1994.

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⁵ This number was generated from an analysis of SP train density records showing train traffic through Reno on two representative days in 1994.

intermodal facility utilizes 3 tracks, two of which are for loading or unloading, and uses a single PC-90 sidelif loader⁶.

3.2 Current UP Reno Operations

Union Pacific runs one local train from North Reno MP 28.3 to Reno Junction MP 0 six days per week. They also operate a local switcher from North Reno to Martin MP 21.3 as needed to service industries in the area. The UP intermodal facility can hold up to 41 intermodal flat cars on two tracks and uses one PC-90 sidelif loader. North Reno also supports and automobile unloading operation.⁷

Union Pacific and SP have an interchange track near 4th and Record Streets connecting the UP Reno Branch with the SP main line for exchanging rail cars. We received information from local SP operating representatives that this interchange is currently inactive. An inspection of this interchange track confirms this information.

3.3 Proposed Merged UP/SP Operations

The merged railroads' operating plan (Plan) included in the merger application shows one passenger and 20 freight trains per day through Reno for an increase of 7 trains per day from current levels.⁸ These numbers do not include Burlington Northern Santa Fe (BNSF) trains, Reno Fun trains, Ski and special excursion trains, or local operations. The Plan calls for an increase in train tonnage through Reno from the present level of 20 million to 33 million gross tons per year, an increase of 63%. The environmental report section of the merger application, however, indicates an increase in train traffic of 9 trains per day,⁹ different than Volume 3. Also, the Plan only looks at what traffic levels will be the day after the merger changes and construction projects take place with no provision for growth.

Hazardous materials are most generally handled in manifest trains under strict positioning rules and regulations. Cars must be placard identifying the commodity or chemical being moved. According to statistics from the American Association of Railroads (AAR) movement of these chemicals by rail is considerably safer than movement over the road. It is possible that a modest increase of this traffic will occur through Reno as a result of this merger. However, heavier and slower manifest trains most likely to carry these commodities will probably be routed through the Feather River line to avoid delaying the expedited intermodal and auto trains using the Donner route.

⁶ UP-SP Common Point Team #3 report on Area #6.

⁷ Ibid.

⁸ ICC Finance Docket # 32760, Railroad Merger Application, Volume 3, Page 385.

⁹ Ibid, Volume 6, Page 2, Pages 56 and 93.

Similarly, unit coal, grain, and ore trains (80 to 90 cars, 12,000 tons, 5,000 feet) will also probably operate via the Feather River route.

We estimate post-merger traffic at 30 freight, 2 passenger (on average), and 2 local trains per day through Reno for a total of 34 trains per day.¹⁰ Historical trends factored into this estimate take into account the 22 trains per day moving through Reno in 1980¹¹, the former Western Pacific Railroad (WP) operation of 6 trains per day, anticipated BNSF traffic of 2 trains per day, expected and historic passenger train activity at 2 trains per day on average, and 2 movements of the local switch engine between Sparks and West Reno. This projection also takes into account the growth anticipated in rail traffic in and out of the Port of Oakland as part of their major expansion plans. The Port of Oakland is anticipating 6% average annual growth in rail demand. With UP's enhanced competitive position over the central corridor brought on by this merger, intermodal traffic through Reno should grow at a rate at least equivalent to this rate.

Southern Pacific historically operated over Donner Summit with trains that ranged up to 8,000 feet in length and 10,000 tons. Trains of 7,000 feet (8,000 tons) or greater generally required helper locomotives to negotiate the 2.6% grade and heavy curvature. SP trains historically averaged around 6,000 feet in length.¹² Union Pacific operating personnel have indicated that they will probably operate most trains on this route without helper locomotives, indicating that most trains will not exceed 7,000 feet. We believe average post-merger train lengths will be around 6,500 feet with a few in the 7,000 to 8,000 foot range using helper locomotives.

The merged railroad operating plan showing 21 trains per day does not include the expected 2 BNSF trains, 1 Reno fun or ski train, or 2 local switching movements. In addition, the merged operating plan shows 10 trains diverted away from the UP's Feather River route while only 7 are added to the Donner route.¹³ Based on conversations with SP operating officers we believe that some trains might be diverted from the Feather River route to other rail routes including Roseville to Oregon and Roseville to southern California. We believe that the operating plan might also not be accounting for peak volumes that occur seasonally.

The merged operating plan indicates that the UP will reduce their Reno branch operation to one local train per day from North Reno to Reno junction. They will also move their intermodal and automotive operations from North Reno to Sparks. This move will require and eventual expansion of SP's current intermodal facility at Sparks.¹⁴

¹⁰ Based on the knowledge of railroad operating specialists and historical trends in northern Nevada.

¹¹ 1980 represents the year of the Reno trainway bond issue vote.

¹² According to a former SP Sacramento Division operating superintendent.

¹³ The 7 trains would increase to 9 if the figures in Volume 6, Part 2 are used.

¹⁴ UP-SP Common Point Team #3 Report, Area #6, and Intermodal Rationalization Summary.

3.4 Other Railroad Corridor Issues

The SP right-of-way through downtown Reno also contains two other significant features, a 6 inch petroleum product pipeline and an MCI fiberoptic cable. The pipeline is provides finished petroleum products to a large tank farm terminal in Sparks. This terminal is the easternmost outlet for pipeline-delivered petroleum products in northern Nevada. The fiberoptic cable is the principle "information superhighway" between Sacramento and Salt Lake City. Both facilities are buried at various depth and locations adjacent to the SP tracks.

4.0 Railroad Crossings in Downtown Reno

Reno streets cross the SP main line at-grade 15 times. These include the following:

1. Woodland Ave.
2. Del Curto Drive
3. Keystone St.
4. Vine St.
5. Washington St.
6. Ralston St.
7. North Arlington St.
8. West St.
9. Sierra St.
10. Virginia St.
11. Center St.
12. Lake St.
13. Morrill Ave.
14. Sutro St.
15. Sage St.

Galletti Way is not included in this list since it is in the City of Sparks. Other crossings of SP tracks not on the main line include Fourth St., Record St., and Fifth St., all of which are on inactive SP rail spurs. Appendix B contains a SP list of these crossings along with maps showing their location. All public crossings in Reno have active warning devices (flashers, gates, or both).

4.1 Traffic Levels

Traffic models for downtown Reno forecast significant growth in vehicular and pedestrian traffic on nearly every street. For instance, from 1990 to 2015 traffic volumes across

the tracks on Virginia Street could increase by 7,400 vehicles per day, Center St. by 7,400 vehicles per day, and Sierra St. by 9,600 vehicles per day.¹⁵ With train traffic doubling, conflicts between trains and vehicles or pedestrians could represent the greatest potential constraint to the smooth flow of traffic in the downtown area.¹⁶ Appendix C contains excerpts from Barton-Aschman's Reno Downtown Traffic/Parking Study report showing these traffic estimates.

4.2 Potential Traffic Delays

As part of this study our team calculated the average time crossing gates would be down at a typical downtown Reno crossing for a variety of train lengths. We determined that a 6,000 foot train traveling at 20 mph would result in gates down for 3.9 minutes; a 6,500 foot train would hold gates down for 4.2 minutes; and a 1,500 passenger or local freight train would keep gates down for 1.4 minutes. We estimated that current gate down time based on 14 trains per day (11 freight, 1 passenger, and 2 local switching movements) would be 52.7 minutes per day. This number compares well with actual field measurements made by the City's traffic control computer for 4 downtown crossings in January, 1996.¹⁷ Based on these assumptions we estimated that downtown traffic on the 8 crossings from and including Washington to Lake are presently causing around 4,344 minutes of delay to vehicles stopped for trains. Using this same methodology we estimated the delay that might occur by 2015 based on projected train and vehicular traffic levels downtown. For the same crossings we calculated a total of 18,952 minutes of delay to vehicles stopped for trains, an increase of 339%. This corresponds to each crossing being blocked about 133 minutes each day. See the table in Appendix D for a detail of these estimates.

These crossing blockage estimates do not account for a situation where two trains simultaneously converge on the downtown area. In this case some crossings would stay down for up to 8.5 minutes. Traffic stopped on streets such as Virginia, Center, or N. Arlington would probably gridlock several cross streets under such conditions.

Based on available figures, we estimate that current levels of crossing delay are costing motorists \$163,000 per year. Without mitigation, this cost could climb to \$720,000 per year by the year 2015.

¹⁵ Reno Downtown Traffic/Parking Study, Dec. 1995, Barton-Aschman Assoc. & Strategic Project Management.

¹⁶ Ibid.

¹⁷ Memo dated 1/30/96 from Mr. Jim Position, City of Reno traffic department, copy on file, showing a range of total crossing closures from 41 min. 33 sec. To 54 min. 21 sec. on Sierra, Center, Virginia, and Sutro Streets from 5 Jan. to 25 Jan, 1996.

4.3 Accident History

Police files indicate that 3 people have died in railroad crossing accident in Reno from 1970 through 1995. During that same period 18 people have been injured in vehicles, and 41 collisions have resulted in some level of damage. Three pedestrians have been killed and 2 more injured. These figures do not include trespasser incidents between crossings. Appendix E contains a summary of these accident statistics.

As mentioned in a previous section, all at-grade public crossings in Reno are equipped with active warning devices including bells, flashers, and gates. The crossing detail table in Appendix B provides a summary of the present warning systems.

4.4 Emergency Access

The Regional Emergency Medical Services Authority (REMSA) indicates that they received 28,956 calls requesting service in 1995. Of these calls, 835 patients were transported code 3 to hospitals with life threatening illness or injuries. A significant number of these code 3 transports traveled over railroad crossings. Longer queues and more frequent blockages will cause problems for some patients. Also, two crossings at the west end of town, Woodland Ave. and Del Curto Drive, are the only ingress or egress for the surrounding area. Emergency access is cut off during train blockages in these neighborhoods.

4.5 Public Transit

The Regional Transportation Commission (RTC) advises that 704 bus trip cross the railroad tracks in Reno each day. These buses are on routes 1, 6, 9, 10, 13, 14, 16, 18, 19, and 24. These buses carry 8,713 rider across the tracks each day. These crossings are taking place primarily at Sierra, Center, and Lake Streets. Current rail traffic delays buses for 2 to 3 minutes according to RTC. However, Amtrak trains have been known to delay buses for as much as 20 to 30 minutes.¹⁸

Another transit issue is trains blocking pedestrian access between the CitiCenter transit center and points south of the tracks. Passenger transferring from one bus to another will often miss their connection due to crossing blockages. As some routes currently operate at a one-hour frequency transit riders can be delayed up to an hour by even a short train. Longer or more frequent trains will exacerbate these problems.

¹⁸ Statistic provided by RTC in Jan. 29, 1996 letter to Reno Redevelopment Agency, copy on file.

5.0 Property Issues in Reno Raised by the Merger

The issue divides into two sub issues. The first concerns ownership of the railroad right-of-way and the second the ownership of the right to cross the railroad over a City street.

The first issue concerns both the size and type of title of the existing right-of-way through Reno. Pending further study, we believe that from Lake Street east, there is a Land Grant Station Reservation 400 feet in width. From Lake Street west, the right-of-way width is probably the two-hundred foot strip provided by the Congressional Grant. Southern Pacific has disposed of some of this property. However, since the ownership of much of the right-of-way results from the Congressional Land Grant, SP and UP may still have some control over the property occupied by others, even after the merger.

Two methods of disposal of land grant property are most common. The first is an Act of Congress granting title to a purchase. The second is a long term lease giving the railroad the right to cancel the lease if the property is needed for railroad operating purposes. Southern Pacific has also used other means of conveying title. A thorough analysis of the present status of title to the property composing the original land grant is needed.

The second issue, that is who owns the property needed to cross the City streets over the railroad, depends on whether the street was in use by the public before the railroad was built. If the railroad came first, they own the property under the street and will usually grant the City easement to cross the tracks. If the street existed before the railroad was built, the City owns the property under railroad and will generally grant the railroad a franchise to cross the street.

Whether the railroad or the City owns the property has a direct bearing on how the costs of improving grade crossings are allocated according to Nevada PSC and federal rules. The agreement contained in a deed of easement or the franchise usually control. We believe that Lake Street and possibly Virginia Street were public streets before the railroad was built. The rest of the streets in Reno were most likely built after the railroad.

6.0 Environmental Issues

The ICC requires an environmental analysis when increases in rail traffic exceed the thresholds established in 49 CFR 1105.79(e)(5)(i) and (ii). These thresholds include air quality for line segments with increases of 8 trains per day in attainment and 3 trains per day in non-attainment areas. They also include noise for line segments with increases of 8 trains per day or 100% of annual gross ton miles. The SP route through Reno exceed these thresholds. The merger application therefore includes a air quality and noise analysis for the increased rail traffic through Reno.

The ICC thresholds also apply to railroad yards and intermodal facilities. Based on criteria contained in the merger application,¹⁹ the virtual doubling of activity at SP's intermodal facility at Sparks should require both an air quality and noise analysis for that location. However, the merger application does not contain such an analysis.

6.1 Air Quality

The merger application indicates an increase in air pollutants proportional to the anticipated increase in train traffic of 9 trains per day.²⁰ These pollutants include 8.23 tons per year of CO and 1.34 tons per year of PM, both of which non-attainment in Air Quality Control Region (AQCR) 148 that includes Reno and Sparks. It appears that these numbers do not include any adverse air quality impact from idling vehicles stopped at crossings which could be significant.

6.2 Noise

Page 56 of Volume 6, Part 2, Page 56 of the merger application contains the following quote,

"Reno, NV: The line runs through the center of Reno. There are several grade crossings along the tracks. The area is mainly industrial and commercial, but there are residential areas near Sparks, on the western edge of town, and near the tracks throughout the middle of town."

Table 2-14 on page 58 indicates that Reno has 41 sensitive receptors pre-merger and 146 post-merger.

In fact downtown Reno is a high-density commercial and recreational area with 13,075 licensed hotel and motel rooms within one-half mile of the tracks along with 362 single family and 1,770 multi-family residential units. Hotel and motel room capacity has grown by over 18% in the last 5 years.

6.3 Groundwater and Toxics

Groundwater issues have a significant bearing on any major infrastructure changes made to remediate the effects of this merger in the downtown area. Groundwater was one of the major

¹⁹ ICC Finance Docket No. 32760, Railroad Merger Application, Volume 6, Part 1, Page 5.

²⁰ Ibid., Part 2, Table 2-22, Page 85.

concerns voiced by SP engineers during the planning of the proposed depressed trainway in 1980.

Groundwater depth is controlled to a large extent by surface flows in the Truckee River. Water is shallowest adjacent to the river with depths ranging from 10 to 15 feet. Water depths increase to the north in proportion to the distance from the river. Water in the area of the SP tracks is on the order of 20 to 30 feet deep. This depth typically decreases during the spring and early summer when high snow melt flows in the river recharge basin. In the fall and winter, groundwater levels decline as the underground flows reverse and the river becomes the gaining stream. Groundwater depths may vary 5 to 10 feet depending on the season.

Groundwater quality has been impacted by a variety of historical activities over the years. Kleinfelder performed a preliminary assessment of hydrocarbons in the groundwater for the City in the early 1980's. This study revealed the presence of floating products including heating oil. This material was being intercepted by various basement drainage systems and discharged to the Truckee River. Dissolved constituents of gasoline and diesel fuels (BTEX) have also been encountered in the uppermost unconfined aquifer. Several small scale remedial projects are now underway.

The State commissioned a study which revealed widespread presence of chlorinated solvents at relatively low concentrations. These pollutants have also been discovered in at least one municipal well (Morrill Street site). The Washoe County Regional Water Management Agency is pursuing the creation of a remediation district ~~encompassing~~ most of the downtown to effect a clean-up.

7.0 Economic Effects of Merger

The combined UP/SP route between Oakland and Chicago will be shorter than the UP or the SP route. Mileage reductions will come from combining parts of the UP and SP routes to create a new route much shorter than either railroad's present system. Oakland to Chicago, via Reno, will show a reduction of 388 miles from SP's present route and 189 miles from UP's line.²¹

This merger will generate significant net savings to the UP. Overall it will benefit the merged system approximately \$750 million.²² Operating saving coming from changes to yards and intermodal facilities in Reno and Sparks contribute about \$400,000 annually to this figure.²³

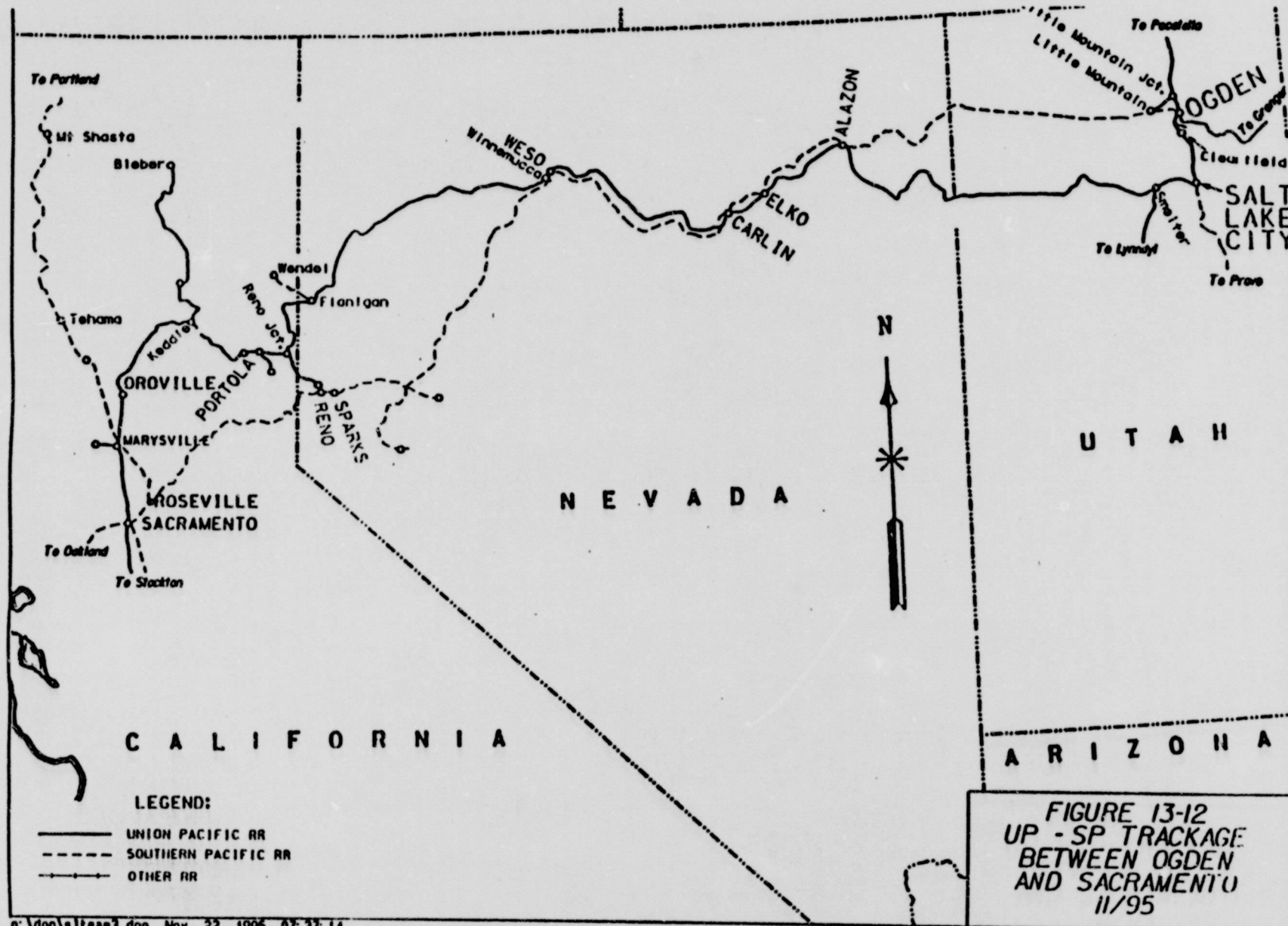
²¹ Ibid., Volume 1, Pages 29 & 30.

²² Ibid., Page 93.

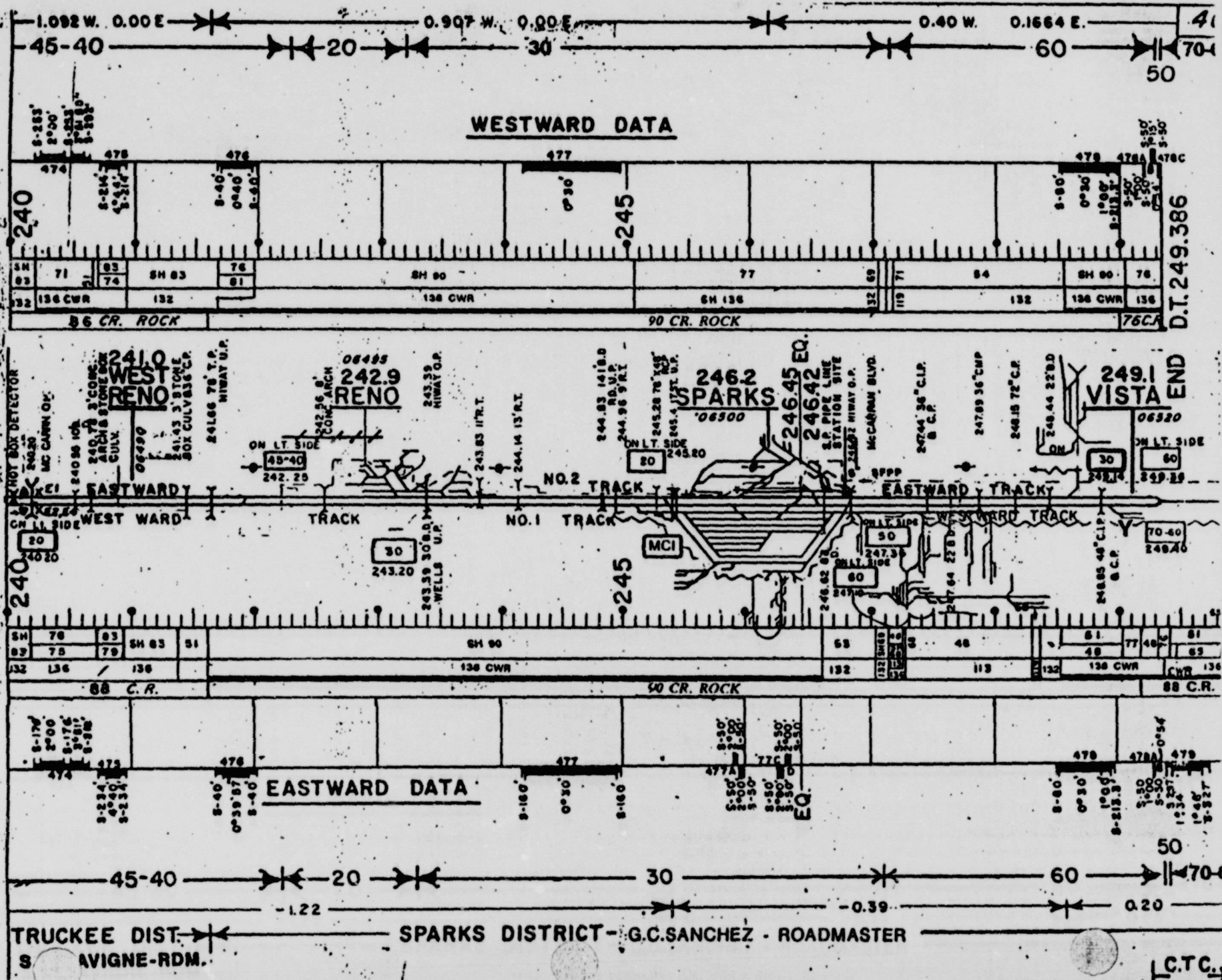
²³ UP-SP Common Point Team #3 Study, Page 2.

APPENDIX A

RAILROAD TRACK CHARTS AND MAPS



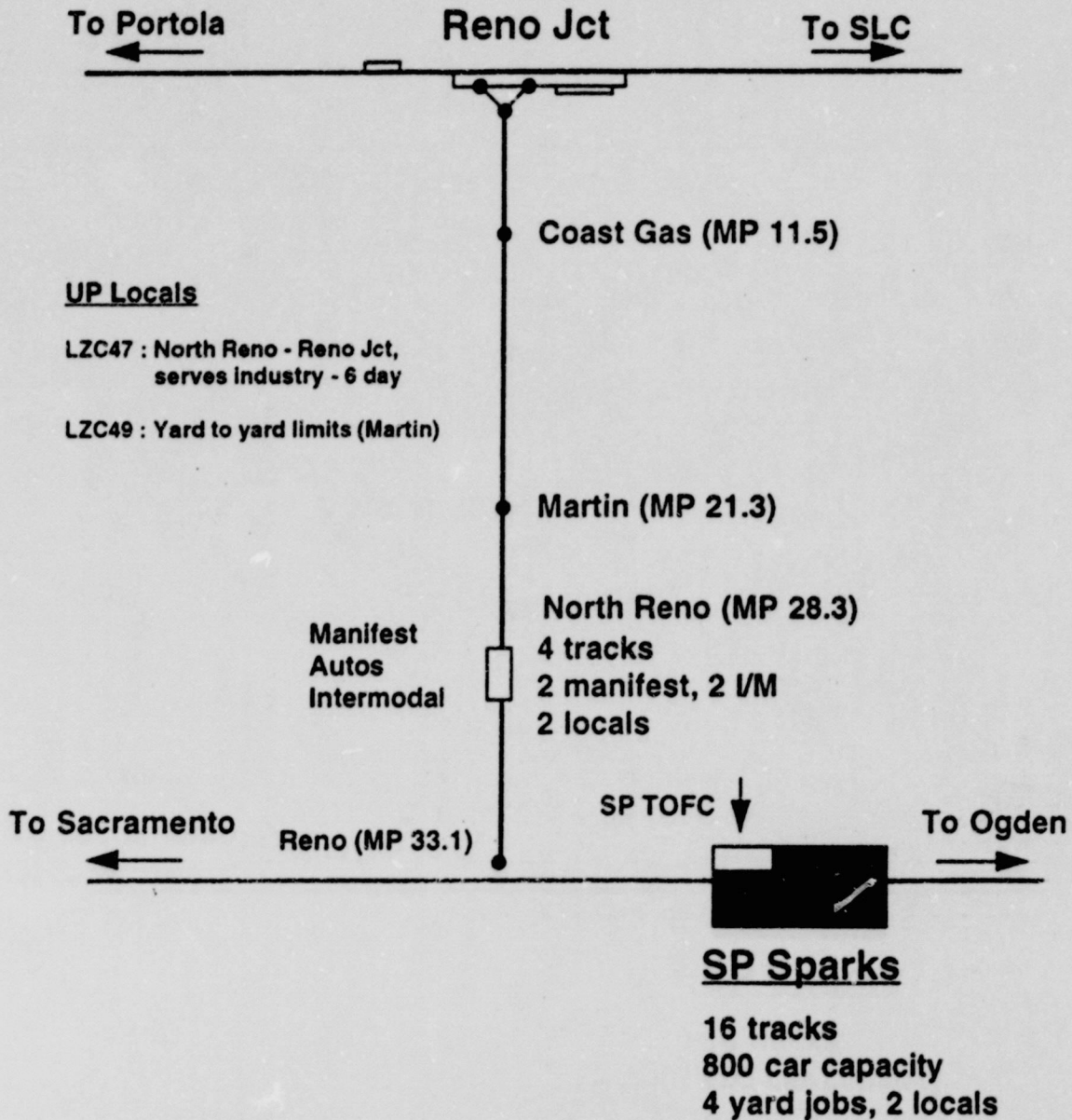
REVISED: JANUARY 1, 1996



APPENDIX B

CROSSING DATA AND LOCATIONS

UP/SP Reno Current Operations



X TLOC

DETAIL OF CROSSINGS BY LOCATION

R. ROAD ID	FEDERAL DOT NUMBER	STATION	STREET OR ROADWAY	PRESENT WARNING SYSTEM	DATE IN SERVICE	CROSSING SURFACE
A - 234.58-A	740713A	MOGUL	I 80 OVERPASS			
A - 234.98-BX	740712T	MOGUL	PRIVATE UNDERPASS			
A - 235.40-X	740714G	MOGUL	CANEPA RD (PRIVATE)			FULL PLANE
A - 235.50-	740715M	MOGUL	MOGUL ROAD	2 9	11/09/83	PLASTIC
A - 235.81-	740716V	MOGUL	MOGUL ROAD	2 9	11/09/83	PLASTIC
A - 236.10-X	740717C	MOGUL	PRIVATE CROSSING			FULL PLANE
A - 237.00-X	740718J	LAWTON	GEORGE I. BENNY KING.	2 9 2 8	03/14/66	FULL PLANE
A - 237.75-C	740903D	LAWTON	WHITE FIR			ASPHALT
A - 238.00-	740719R	LAWTON	① WOODLAND AVE.	2 9	04/06/73	ASPHALT
A - 238.40-B	752080T	LAWTON	MAYBERRY RD UNDERPAS			
A - 238.75-X	740720K	LAWTON	PRIVATE CROSSING			ASPHALT
A - 240.00-A	753563G	WEST RENO	MCCARRAN BL OVERPASS			
A - 240.40-	740722Y	WEST RENO	② DEL CURTO DRIVE	2 9	07/31/80	HEADERS
A - 241.53-B	740723F	WEST RENO	WEST SECOND ST U.P.			
A - 241.85-C	740893A	WEST RENO	WEST FOURTH STREET			
A - 242.10-	740724M	RENO	③ KEYSTONE ST	2 9A	07/18/80	RUBBER
A - 242.20-	740725U	RENO	④ VINE ST	2 9A	12/07/77	PLASTIC
A - 242.30-	740726B	RENO	⑤ WASHINGTON ST	2 9	05/23/80	PLASTIC
A - 242.38-C	740896V	RENO	FIFTH STREET	NOT ON MAIN LINE		ASPHALT
A - 242.45-	740727H	RENO	⑥ RALSTON STREET	2 9	07/25/80	PLASTIC
A - 242.60-	740728P	RENO	⑦ N ARLINGTON ST	2 9A 3G10	03/12/80	RUBBER
A - 242.70-	740729V	RENO	⑧ WEST ST	2 9A 4G10	09/04/80	PLASTIC
A - 242.74-	740730R	RENO	⑨ SIERRA ST	2 9A 4G10	04/16/80	RUBBER
A - 242.81-	740731X	RENO	⑩ VIRGINIA ST	2 9A 4G10	04/18/80	RUBBER
A - 242.88-	740732Z	RENO	⑪ CENTER ST	2 9A 4G10	05/16/80	RUBBER
A - 242.95-	740733L	RENO	⑫ LAKE ST	2 9A 4G10	06/27/80	PLASTIC
A - 243.11-C	752076J	RENO	RECORD			
A - 243.37-C	740734T	RENO	FOURTH STREET	2 8A	NOT ON MAIN LINE	01/30/81
A - 243.40-A	740735A	RENO	WELLS AVE OVERPASS			
A - 243.50-	740736G	RENO	⑬ NORRILL AVENUE	2 9	04/24/81	ASPHALT
A - 243.68-	752088D	RENO	⑭ SUTRO STREET	2 9A 2 9	06/16/89	RUBBER
A - 243.91-	753815F	RENO	⑮ SAGE STREET	2 9	07/10/90	RUBBER
A - 244.23-A	740739C	RENO	US 395 OVERPASS			
A - 244.33-C	752072G	RENO	HAROLDS SPUR			
A - 244.38-C	752073N	RENO	NEV PURCHASING RD	PRIVATE		GRAVEL/DI.
A - 244.41-C	752074V	RENO	NEV PURCHASING SP			
A - 244.46-C	752075C	RENO	NEV PURCHASING RD			ASPHALT
A - 244.65-	740740W	SPARKS	GALLETTI WAY	2 9	11/02/76	RUBBER
A - 244.80-B	740741D	SPARKS	KIETZEE LANE U.P.			
A - 245.34-C	752065W	SPARKS	18TH ST			ASPHALT
A - 245.40-B	740742K	SPARKS	ROCK BLVD UNDERPASS			
A - 245.69-C	752066D	SPARKS	15TH ST EXTENSION			ASPHALT
A - 246.27-C	740898J	SPARKS	FREEPORT BLVD			ASPHALT
A - 246.29-C	740899R	SPARKS	GREG STREET	2 9A	02/10/86	ASPHALT
A - 246.40-C	740857C	SPARKS	GLENDALE AVE	2 9A	01/04/85	HEADERS
A - 246.45-C	752071A	SPARKS	SEARS			GRAVEL/DI
A - 246.90-A	740743S	SPARKS	MCCARRAN BLVD O.P.			
A - 246.95-C	740900H	SPARKS	EAST GLENDALE			ASPHALT
A - 247.19-C	752070T	SPARKS	S S KRESGZ CO			

ESTIMATED VEHICULAR DELAY

Crossing	1995						2015					
	ADT	Freight Trains (6000')*	Delay (min.)	Other Trains (1500')**	Delay (min.)	Total Delay (min.)	ADT	Freight Trains (6500')***	Delay (min.)	Other Trains (1500')**	Delay (min.)	Total Delay
Keystone	N/A	11	-	3	-	-	N/A	30	-	4	-	-
Vine	N/A	11	-	3	-	-	N/A	30	-	4	-	-
Washington	2,000	11	117	3	4	121	1,900	30	348	4	5	353
Ralston	2,800	11	163	3	6	169	3,300	30	604	4	9	613
N.Arlington	15,200	11	886	3	32	918	20,300	30	3,715	4	57	3,772
West	3,200	11	187	3	7	194	7,400	30	1,354	4	21	1,375
Sierra	10,800	11	630	3	23	653	18,200	30	3,330	4	51	3,381
Virginia	15,200	11	886	3	32	918	22,200	30	4,063	4	62	4,125
Center	12,700	11	740	3	27	767	15,900	30	2,910	4	45	2,955
Lake	9,500	11	554	3	20	574	12,800	30	2,342	4	36	2,378
Morrill	N/A	11	-	3	-	-	N/A	30	-	4	-	-
Sutro	N/A	11	-	3	-	-	N/A	30	-	4	-	-
Sage	N/A	11	-	3	-	-	N/A	30	-	4	-	-
Total						4,314						18,952
Increase												339%

* A 6,000 foot train causes 3.9 minutes of gate-down time @ 20 MPH

** A 1,500 foot train causes 1.4 minutes of gate-down time @ 20 MPH

*** A 6,500 foot train causes 4.2 minutes of gate-down time @ 20 MPH

APPENDIX E

CROSSING ACCIDENT DATA

RAILROAD GRADE CROSSING COLLISIONS 1970 - 1995

SOUTHERN PACIFIC RAILROAD MAINLINE IN DOWNTOWN RENO

STREET NAME	DOT NO.	RRMP	RR ADT	HWY ADT	FATAL	COLLISIONS	
						PROPERTY DAMAGE	PERSONAL INJURY
WOODLAND AVE	740-718R	237.98	19.00	1,800	2	1	2
DEL CURTO AVE	740-722Y	240.82	19.00	130	0	0	0
KEYSTONE AVE	740-724M	242.10	23.00	20,800	0	8	4
VINE ST	740-725J	242.21	23.00	3,500	0	1	0
WASHINGTON ST	740-726B	242.30	25.00	1,700	0	0	0
RALSTON ST	740-727H	242.45	25.00	4,000	0	1	0
ARLINGTON AVE	740-728P	242.60	25.00	12,723	0	3	4
WEST ST	740-729W	242.70	25.00	4,700	0	0	0
SIERRA ST	740-730R	242.75	25.00	11,320	0	2	0
VIRGINIA ST	740-731X	242.80	25.00	16,300	1	10	3
CENTER ST	740-732E	242.90	25.00	13,781	0	4	0
LAKE ST	740-733L	242.95	25.00	10,700	0	6	1
MORRILL AVE	740-738G	243.50	25.00	500	0	1	0
SUTRO ST	762-098J	243.70	25.00	13,000	0	0	1
SAGE ST	763-816F	243.91	24.00	1,600	0	3	2
GALLETTI WAY	740-740W	244.85	27.00	9,119	0	1	1

NOTE: THIS COLLISION DATA INVOLVES MOTOR VEHICLE INCIDENTS ONLY. PEDESTRIAN V.S. TRAIN COLLISIONS ARE NOT INCLUDED AS THE DATA IS NOT REPORTED TO NDOT OR DMV.

**PEDESTRIAN INCIDENTS AT RAILROAD CROSSINGS IN DOWNTOWN RENO
SOUTHERN PACIFIC MAINLINE
1970 THRU 1995**

<u>STREET NAME</u>	<u>INJURY ACCIDENT</u>	<u>NUMBER INJURIES</u>	<u>FATAL ACCIDENT</u>	<u>NUMBER FATALITIES</u>
WOODLAND AVE				
DEL CURTO AVE				
KEYSTONE AVE				
VINE ST				
WASHINGTON ST				
RALSTON ST			1	1
ARLINGTON AVE				
WEST ST				
SIERRA ST				
VIRGINIA ST			1	1
CENTER ST	1	1		
LAKE ST			1	1
MORRILL AVE				
SUTRO ST	1	1		
SAGE ST				
GALLETTI WAY	—	—	—	—
TOTALS	2	2	3	3

NOTE: NDOT DOES NOT AUTOMATICALLY RECEIVE REPORTS OF TRAIN VS PEDESTRIAN COLLISIONS, THEREFORE THIS DATA ONLY REPRESENTS THOSE REPORTS THAT BEEN SECURED WHEN INCIDENTS HAVE COME TO THE ATTENTION OF NDOT AND IS NOT NECESSARILY COMPLETE.

**Union Pacific/Southern Pacific Merger
CITY OF RENO
COMMUNITY IMPACTS AND CONCERNS**

Tourist destination

Increased trains through a major tourist destination

Public safety concerns

Emergency response jeopardized when trains are blocking access across tracks

Emergency access

Tracks separate two major hospitals from ambulance/paramedic provider

Air quality management

Increased vehicular traffic waiting at train crossings

Crossings

Public endangerment at protected and unprotected crossings

Hazardous material transportation

Increased risk transporting more hazardous materials by rail

RENO FREIGHT TRAIN IMPACTS*

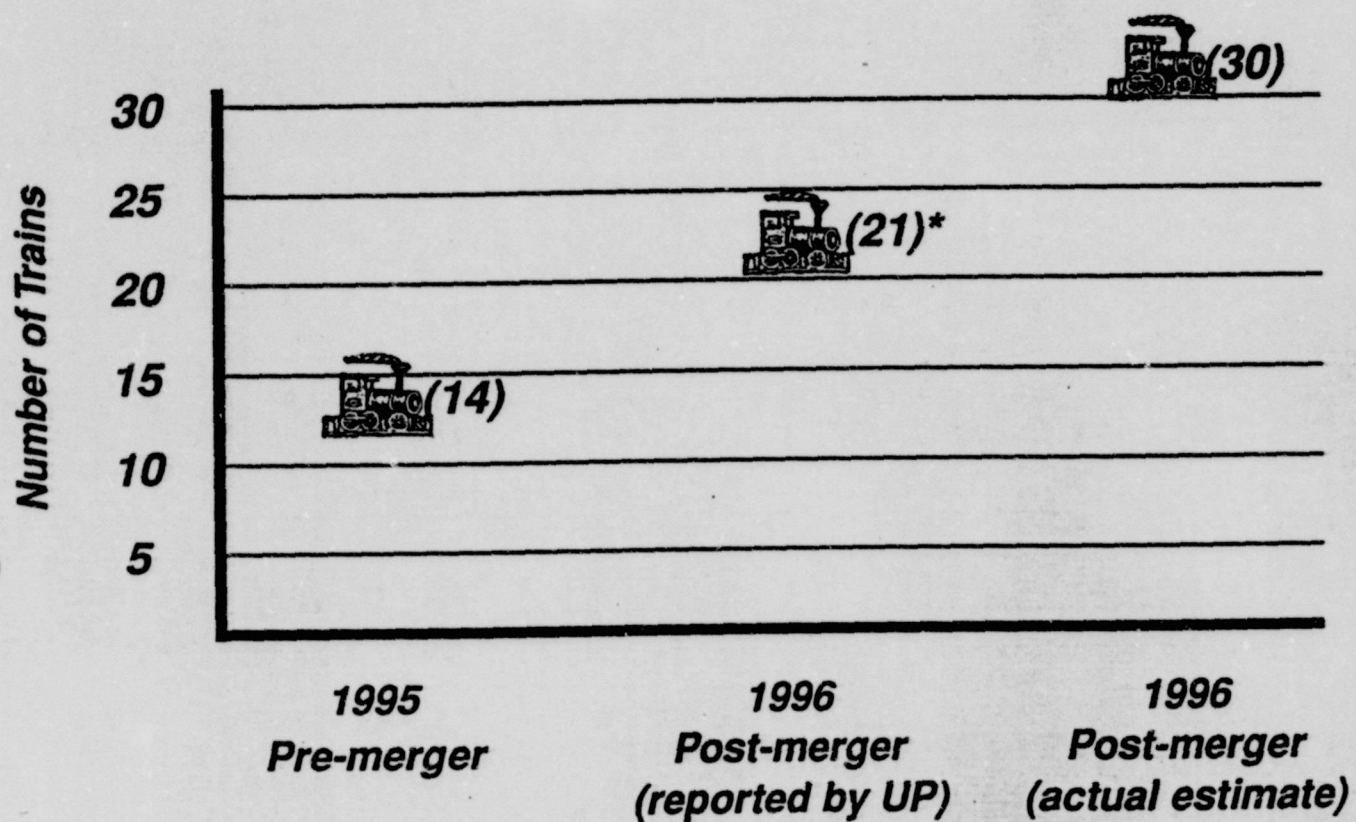
Prior/After Union Pacific/Southern Pacific Merger

	PRIOR TO MERGER	AFTER MERGER
TRAIN LENGTH	5,000 feet	8,000 feet
AVERAGE TRAIN SPEED	10 mph	10 mph
TRAIN FREQUENCY	14 per day	21-30** per day
ESTIMATED DELAY TIME AT DOWNTOWN CROSSINGS	80-110 minutes	6 hours

*Source: Reno Downtown Traffic/Parking Study
December 1995

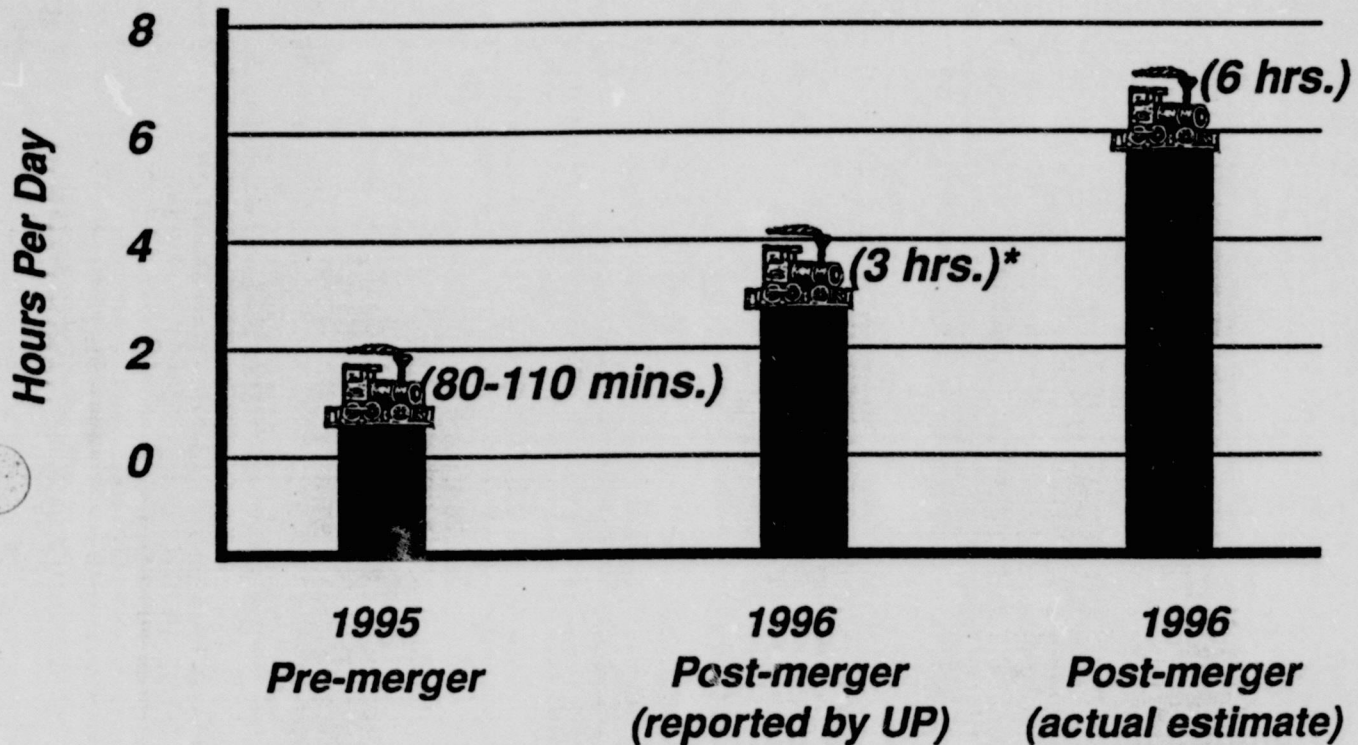
**Union Pacific projected seven additional trains per day in their operating plan filed with the merger application. We anticipate this figure to be higher due to the elimination of the Feather River route, increased traffic from the Port of Oakland and trackage rights guaranteed to Burlington Northern Santa Fe after the merger.

Downtown Reno Freight Train Traffic Prior to and after UP/SP Merger



** UP projects increased train traffic to be seven additional trains. We anticipate this figure to be higher due to the elimination of the Feather River route, increased traffic from the Port of Oakland, and Burlington Northern Santa Fe.*

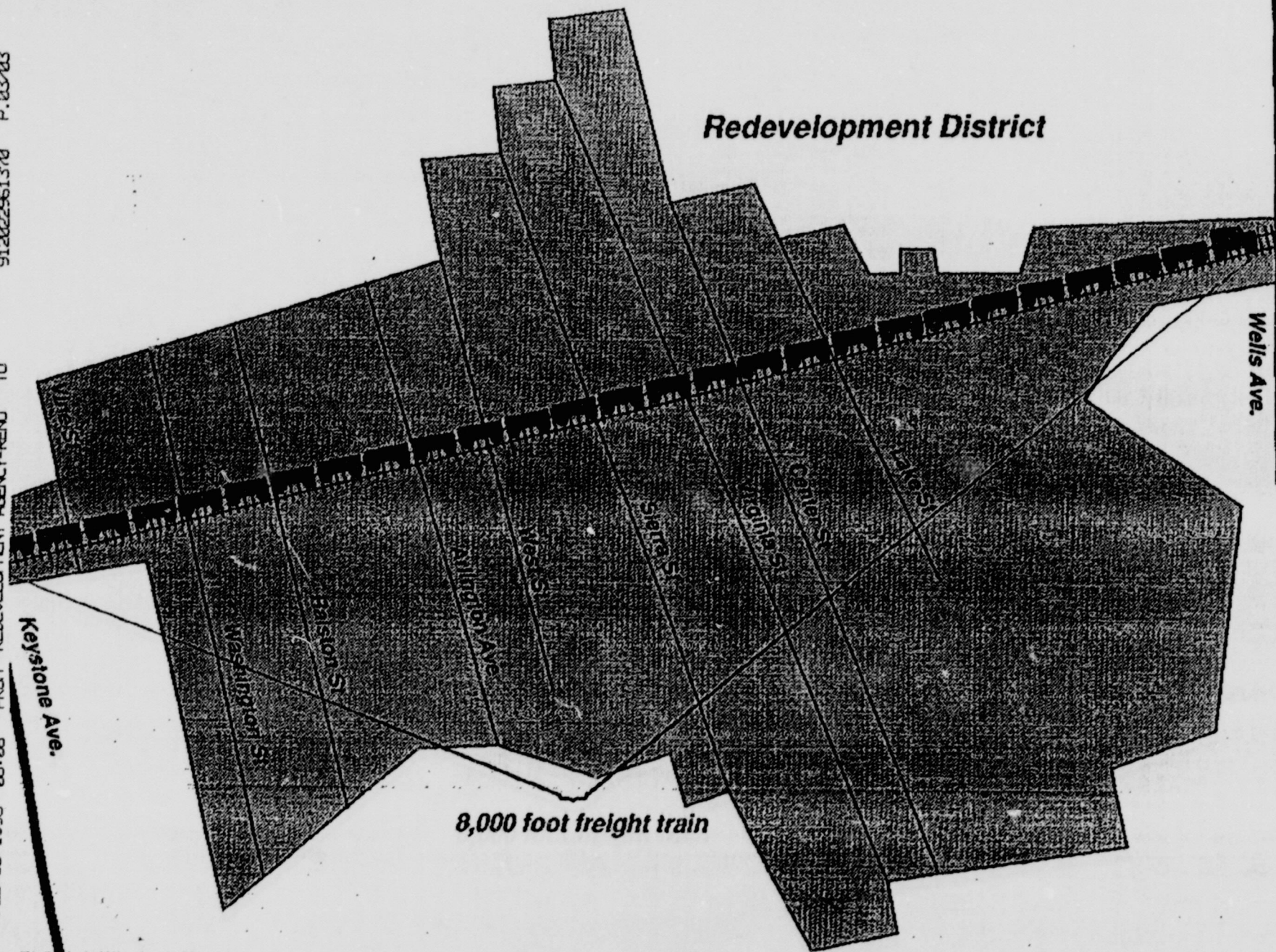
Estimated Delay Time & Blockage at Reno Downtown Crossings



* UP projects increased train traffic to be seven additional trains. We anticipate this figure to be higher due to the elimination of the Feather River route, increased traffic from the Port of Oakland, and Burlington Northern Santa Fe.

Note: The majority of train traffic is estimated to occur between 6 am and 6 pm—peak downtown business hours.

Keystone Ave.



Redevelopment District

8,000 foot freight train

Wells Ave.

ITEM 3

Final Report



RENO DOWNTOWN TRAFFIC / PARKING STUDY

Submitted to
Redevelopment Agency of the City of Reno

Submitted by
Barton-Aschman Associates, Inc.
Strategic Project Management
Lumos & Associates, Inc.



December 1995

RENO DOWNTOWN TRAFFIC AND PARKING STUDY

Prepared for

City of Reno

Prepared by

**Barton-Aschman Associates, Inc.
Strategic Project Management
Lumos Associates**

December 1995

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Executive Summary

Background and Overview

The Redevelopment Agency has recognized the importance of the transportation system in supporting market-driven development which may occur in downtown Reno. This report summarizes a series of study tasks undertaken to carefully evaluate the ability of the transportation system to support growth which may occur. As part of the assessment, a circulation plan has been developed which provides guidelines for the City and Redevelopment Agency to use in carefully crafting a transportation system which will serve downtown Reno well into the future.

Transportation Resources

Early study activities were structured to include development and reconciliation of a number of data resources which served as a base for developing the downtown circulation and parking plan. In recent years, the City of Reno has undertaken a number of special studies including parking, parking management, a "Blueprint" for downtown Reno redevelopment, a "Strategy for Revitalization of the Truckee River Corridor," and other study efforts intended to bolster and promote the redevelopment effort in downtown Reno. To the extent possible, the consulting team accessed available information and in addition has undertaken a series of activities to develop independently generated data concerning downtown Reno. The report includes a detailed summary of transportation resources, provided in an inventory format.

The report also includes a parking survey which was taken in downtown Reno in an attempt to separate casino or business-related parking from private parking. Location of entrances and exits were noted by street location in order to utilize the information subsequently in the traffic modeling process and development of the circulation plan. Street information and facility inventories have been refined after review by technical staff. Additional data were collected and was utilized in the technical analysis but may not be included in the figures and tables included in the report.

Opportunities and Constraints

In order to assure that all available strategies for transportation system improvement were considered, the study effort included an activity to classify and catalogue transportation resource opportunities and constraints. Data which was generated in earlier study tasks were expanded to include a "laundry list" of opportunities and constraints. The listing does not imply that any of the opportunities necessarily should be implemented. The listing simply represents potential improvements that could be packaged into alternative transportation networks for testing. In addition, many of the opportunities for street system improvement could be implemented over time as the downtown continues to redevelop.

A significant effort was undertaken to secure traffic counts from local governmental agencies, including the Nevada Department of Transportation, the Regional Transportation Commission, City of Reno, and a number of private engineering firms. Recent year traffic counting is somewhat suspect due to the construction which has been in steady progress in downtown Reno for the past 2-3 years. We believe the variety of sources which have been available have yielded reasonably accurate traffic counts and these were used as necessary for modeling purposes.

Specific parking locations have been identified with the number of spaces available, and where appropriate, typical or maximum occupancy have been identified. These parking summaries are referenced to maps included in the body of the report.

The report also includes a lengthy discussion concerning multi-modal issues. Employee shuttle bus services and tourist shuttles are two major issues which have been included in the study to address internal circulation issues within the downtown area. The report includes information developed by the Regional Transportation Commission staff at the request of a number of downtown property owners concerning a proposed downtown Reno trolley system. The information was developed in 1995 and provided to the private property owners. No specific action has been taken by the property owners. The report also includes a discussion concerning development of employee parking at various satellite locations near the downtown. It appears that the development of satellite parking will be a costly enterprise and it may be in the best interest of the City to consider alternative means of developing parking. A number of alternatives are included in the report.

Information is included in the report concerning the possible expansion of utilization of the Southern Pacific railroad corridor. Depending on whether the Southern Pacific/Union Pacific merger is approved and the sale of SP trackage rights to Burlington Northern and Santa Fe Railroads are completed, the freight train frequency in downtown Reno could increase significantly. It appears reasonable to expect the volume of freight trains to at least double. Length of delay will also increase and it is recommended that the City of Reno evaluate all of the mitigation alternatives which may be available before making any decision to move forward with Railroad mitigation strategies.

Review of Redevelopment Prospects and Known Plans

Interviews were conducted with City staff, technical personnel from the City of Reno and Regional Transportation Commission, businessmen, representatives of the Downtown Renovation Association, and private property owners who might have interest in or knowledge concerning the downtown area.

Many other individuals were also contacted via telephone for information concerning current or future development in the downtown. The report includes general observations gleaned from the discussions with the individuals contacted.

Although limited, a summary of known redevelopment plans was assembled and summarized in the report. The redevelopment plans which were identified include those projects which have either been approved, tentatively planned, or are of common knowledge in the community. A summary table is included identifying the projects.

Redevelopment Alternatives

Information was also developed concerning opportunity zones and sites in the downtown. The development of opportunity zones and sites allowed creation of a future year scenario which could be modeled. In order to provide a margin of safety, a relatively aggressive growth scenario was utilized. The purpose of creating an aggressive growth pattern in the downtown is to ensure the ultimate integrity of the circulation plan. If a slower growth scenario evolves, the transportation system will simply provide a higher level of service. The opportunity zones and sites are not intended to represent a master plan of development for the downtown.

This growth scenario suggests a total of 12,938 hotel rooms could be constructed over a 20 year time frame. This growth represents approximately 646 rooms per year, which is in excess of recent historical trends. The calculation does not include the Silver Legacy (1,700 rooms) or the Hampton Inn (408 rooms). If the Reno area were to sustain a burst of growth such as occurred in the late seventies, such a rate of growth may be considered more realistic. The real test of the validity of the assumptions does not relate as much to where and how many hotel rooms are to be built, as to structuring the transportation system and circulation plan to accommodate the largest growth which might be expected to occur. The consulting team believes the opportunities zones and sites offers a sufficiently conservative estimate of possible growth as to adequately protect the integrity of the circulation plan which will be proposed.

Transportation Requirements

The report includes a brief summary of values which were used in developing components of the transportation model. The trip generation rates which have been used are based upon either standard rates as included in the Institute of Transportation Engineers Publication, rates included in other technical studies developed for the City of Reno or Regional Transportation Commission, and where appropriate, City code. Current land use has been merged with known or projected development and

Executive Summary

the proposed opportunity zones and sites in order to arrive at projected estimates of traffic demand for downtown Reno.

2015 Traffic Projections

This section of the report includes the evaluation of alternative circulation plan concepts. The study objective was to determine the optimal combination of transportation system improvements to support the downtown development scenarios identified in earlier study efforts. The transportation system requirements were evaluated using a sub-area enhancement to the RTC Regional Travel Demand model. The downtown roadway network and traffic zones were re-coded to more precisely simulate the location of vehicle origins and destinations at actual parking entrances and exits.

A traditional modeling approach traces person-trips to and from downtown attractions, which may or may not provide parking on-site. The focused model was used to identify deficiencies in the future base roadway network and to test the adequacy of proposed network modifications. The resulting circulation plan contains recommendations for specific transportation system improvements. In addition, the plan lists general policies to guide future construction activities, development and planning of loading areas, parking management practices, zoning requirements, bicycle and pedestrian planning, provisions for public transit service, and railroad planning.

Traffic forecasts for the year 2015 were prepared for the future roadway network as described above. The forecast included the master plan roadway network as approved by local governments and maintained by the Regional Transportation Commission as well as a few minor changes suggested by staff. The consulting team incorporated in the model effort the redevelopment scenarios which were developed in previous tasks. Construction of the known or planned projects in downtown Reno would generate approximately 11,400 new daily trips. The anticipated redevelopment of the opportunity sites as described earlier is estimated to generate an additional 91,800 daily trips in the horizon year.

Since the estimate was based upon current code related to parking requirements, it is assumed that there will be a large projected deficit for unplanned parking in the downtown area and much of this problem will be resolved through the provision of additional employee parking on-site as new casinos are built on the opportunity sites.

The traffic model forecasts predict a substantial growth in traffic during the 25 year period between 1990 and 2015. Nearly every street in the downtown study area would see a significant increase in traffic volume. On Virginia Street, the traffic volume would increase between 3,000 and 7,400 vehicles per day on the segment between Maple Street and Liberty Street. The traffic on Center Street would increase by as much as 7,400 vehicles per day; while on Sierra Street, a traffic increase of 9,600 vehicles per day is expected on the segment between Second and Third Streets. Similar increases were noted on other streets in the downtown.

Although development of the opportunity sites would cause a substantial increase in the daily traffic volume on most downtown streets, the volume to capacity ratio on all but one street in the downtown areas would remain within acceptable levels (LOS D or better). A capacity deficiency is expected on Lake Street, between Second Street and Fourth Street. This deficiency is due to development of

numerous opportunity sites that abut Lake Street. Lane configuration changes may mitigate this deficiency somewhat.

I-80 freeway ramps to and from the east at Center Street are projected to have traffic demands that exceed the capacity of a one lane ramp. Clearly, the existing interchange is insufficient to carry the magnitude of traffic that would be generated by development of all the known projects and opportunity sites. Modifications to the freeway will likely be required in the vicinity of the interchange.

The report includes a summary of intersections which are expected to drop to LOS D and, in some instances, without improvements, additional development will cause other intersections to drop in the level of service evaluation.

A number of changes to the existing street and highway network were suggested for model evaluation. These included the extension of Evans Avenue across the Southern Pacific Railroad tracks, abandonment of portions of Commercial Row, Plaza and First Streets, the connection of Mill Street to State Street and California to Stewart were also considered. The redistribution of traffic volumes which occur as a result of these modifications have been noted in the report.

Alternative Circulation Plan Concepts

The circulation plan for downtown Reno describes the transportation infrastructure necessary to serve the existing and anticipated future development levels. The plan attempts to balance the general public need for adequate circulation through and within the downtown with the interests of visitors and the development community. If the proposed policies are carefully blended with development proposals, the effort may potentially enhance the vitality of the downtown area.

The recommendations for changes in the Reno circulation plan include the following:

1. Evans Avenue should be extended across the Southern Pacific Railroad tracks. This new connection should be pursued only after a larger and more detailed railroad planning analysis is completed to ensure that any change at the Evans Avenue crossing be compatible with an overall railroad plan.
2. Certain roadway segments have been identified as candidates for abandonment. These segments should not be considered for abandonment unless the Regional Transportation Commission, the Reno Police and Fire Departments all agree to the abandonment. These include:

Plaza Street between Center Street and Evans Avenue,
First Street between Sierra Street and Virginia Street,
First Street between Lake Street and Second Street, and
Commercial Row (all segments).

3. The I-80 freeway ramps to and from the east should be widened to include two lanes.

Intersection Improvements

A number of intersection improvements are also recommended:

4. A number of intersection improvements can be accomplished within the existing street width by re-striping. In some instances, the removal of on street parking will be required. Minor street widening would be necessary at a few locations to accommodate the additional lanes.
5. Consider the installation of traffic signals at Sierra Street and Seventh Street, Virginia Street and Seventh Street, Center Street and Seventh Street, and West Street and Sixth Street.
6. Add left turn phasing on the east and west approaches at a number of intersections on Sierra Street, Virginia Street, and Center Street.
7. It is recommended that left turns be prohibited on Virginia Street at Fifth, Fourth, and Plaza Street.
8. One-way streets are not recommended in the downtown. Though a system of one-way streets can generally carry more traffic than a system of two-way streets because there are fewer conflicts at intersections, one-way streets can be confusing and difficult for visitors to negotiate. In addition, the one-way street operation hampers property access and leads to circuitous travel.

Circulation Plan Policies

Circulation plan policies are included and relate to construction activities, loading areas, parking, vehicle circulation, pedestrian circulation, public transit, and the railroad. Each of the policies which are recommended are intended to support and enhance the efficiency and level of service which will be provided by the street network in the future. It is suggested that careful attention be given to each of the proposed policies and that where appropriate, the policies be incorporated in planning documents, conditions of approval and other plans for redeveloping the downtown area.

Conclusion

Perhaps the most troublesome aspect of the circulation plan evaluation has been the Southern Pacific Railroad tracks. The location of the railroad in the center of downtown Reno has created ongoing problems for many years. Problems related to traffic circulation, noise, air pollution, hazardous materials, and public safety issues suggest that the railroad, if not relocated out of the downtown, should at least be addressed in a manner that mitigates to the greatest extent possible the impact of the railroad on downtown Reno.

The consultant has reviewed the earlier 1980 report prepared by SEA, Inc., which proposed to lower the railroad tracks through the downtown area from the intersection of West Second Street to Wells Avenue. The financing proposal included funds from various sources and a major bond issue. The bond issue was defeated. Today, the problems with the railroad tracks continues unabated.

If it can be agreed that the problems with the railroad constitute a nuisance, it should be anticipated that the proposed merger of Southern Pacific and Union Pacific as well as the purchase of trackage rights by Burlington Northern and Santa Fe will significantly increase the impact of the railroad on the downtown Reno area.

The consultant has recommended that the railroad again be reviewed and a plan developed for either lowering the tracks or providing crossings at key locations throughout the downtown.

Special Events Traffic Policy

The City staff has developed a draft special events policy. The proposed policy defines streets which will be available for special events and suggests policy for the administration of special events and related traffic activities. The consultant has reviewed the proposed policy and determined that the policy is in harmony with the proposed circulation plan. Recommendations are included in the report concerning special events traffic issues which reinforce recommendations identified in the traffic circulation plan.

Signage Plan

As part of the study activity, a sign inventory was prepared on a number of the major arterials in downtown Reno. The inventory includes approximate locations of signs, the specific legend or information included on the sign and other locational information. A number of suggestions for change in sign placement are included in the report and a concerted effort was made to identify new information signs which would be of use to visitors and locals. The information signs include signage related to special event venues, city/county offices, parks, scenic drives, museums, etc. As part of the review, it was suggested that an effort be made to further review current signage and remove signs which appear to be repetitive.

APPENDIX C

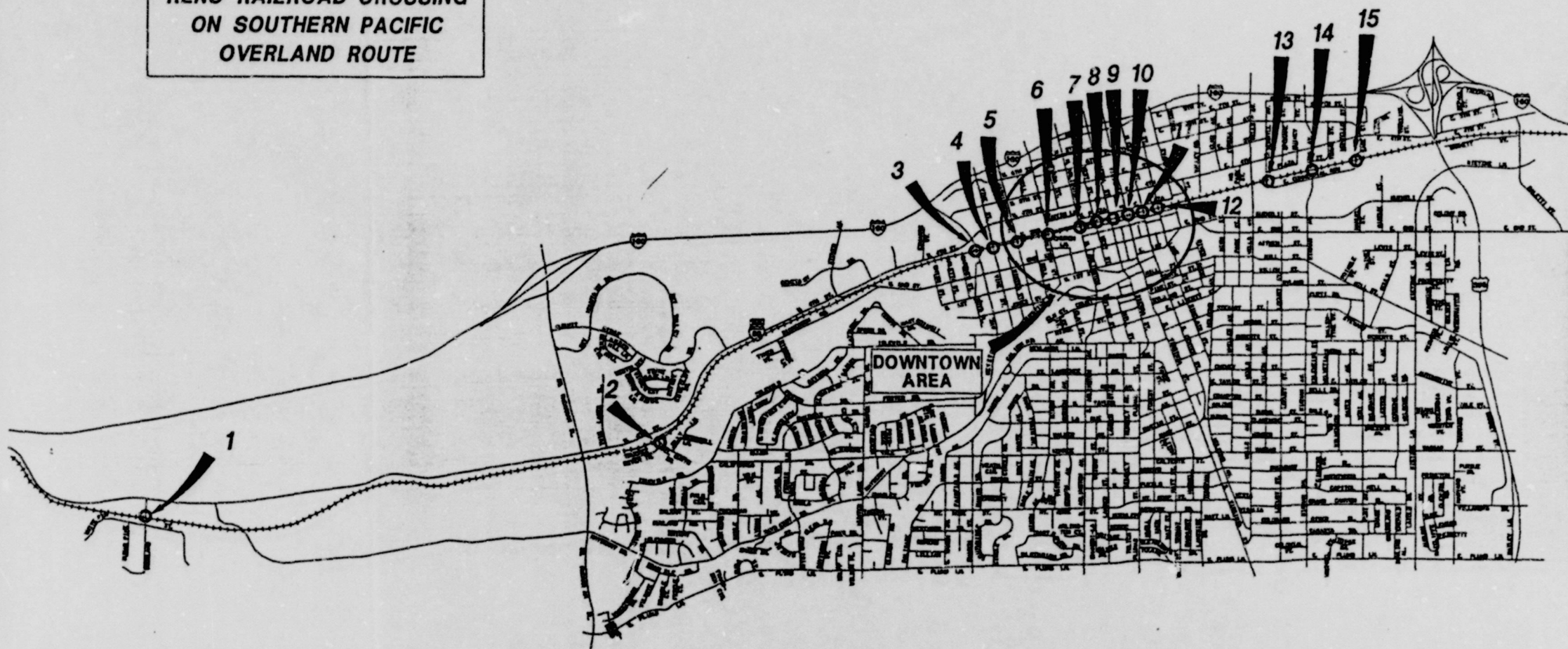
CROSSING TRAFFIC LEVELS

22100C

DETAIL OF CROSSINGS BY LOCATION

RAILROAD ID	FEDERAL DOT NUMBER	STATION	STREET OR ROADWAY	PRESENT WARNING SYSTEM	DATE IN SERVICE	CROSSING SURFACE
- 247.35-C	740902V	SPARKS	GREG STREET			
- 247.40-C	740901P	SPARKS	EAST GLENDALE AVENUE	2 9A	03/18/86	HEADERS
- 247.43-C	762067K	SPARKS	BALSTON PURINA WE	2 9A	04/29/91	RUBBER
- 247.50-C	762069F	SPARKS	S & N -INDUSTRY			
- 247.53-C	762081F	SPARKS	GREG STREET	2 9A		
- 247.62-C	753631S	SPARKS	EAST GLENDALE AVENUE	2 9A	02/13/86	ASPHALT
- 247.64-C	762068S	SPARKS	BALSTON PURINA EE		07/13/84	ASPHALT
- 248.13-A	753564N	VISTA	SPARKS BLVD OVERPASS			
- 248.43-BC	753718W	VISTA	I 80 UNDERPASS			
- 248.88-C	762095V	VISTA	FRANKLIN WAY			ASPHALT
- 248.93-A	753713D	VISTA	VISTA WAY OVERPASS			
- 249.00-	740744Y	VISTA	KLEPPE LANE	2 3	04/10/59	
- 251.95-A	740745F	HAFED	LOCKWOOD RD OVERPASS			
- 253.13-X	740746M	HAFED	MUSTANG BRIDGE RANCH			
- 253.78-B	748380D	HAFED	MUSTANG RANCH U.P.			
- 253.34-X	753720X	PATRICK	MC CARRAN PVT. XING	2 9	12/19/79	ASPHALT
- 257.20-X	740748H	PATRICK	MCCARRAN RANCH ROAD			FULL PLAN
- 257.30-X	753721E	PATRICK	MC CARRAN RANCH XING	1 3	01/01/22	FULL PLAN
- 257.50-X	740749H	PATRICK	EAST MCCARRAN RANCH			FULL PLAN
- 260.13-X	740750C	WUNOTOO	TRACY POWER PLANT			FULL PLAN
- 262.20-	740752R	CLARK	EAGLE PITCHER RD.	2 9 1 8	07/01/91	RUBBER
- 264.93-X	740753X	THISBE	ICID PVT CROSSING			FULL PLAN
- 265.00-BX	740754E	THISBE	DERBY DAM U.P.-PVT			
- 266.50-X	740755L	THISBE	THISBE RD (PRIVATE)			FULL PLAN
- 269.30-	740756T	THISBE	CANAL ROAD	2 9	11/03/94	CONCRETE
- 269.44-BX	740757A	THISBE	PRIVATE UNDERPASS			
- 270.00-X	740758G	THISBE	FROSDICK RANCH			FULL PLAN
- 273.11-BX	740759N	FERNLEY	PRIVATE UNDERPASS			
- 275.40-B	740760H	FERNLEY	US 40 UNDERPASS			
- 276.36-AC	740966H	FERNLEY	IN 80 OVERPASS			
- 276.63-C	740967P	FERNLEY	NEVADA CEMENT			
- 277.51-A	740761P	FERNLEY	US 40 OVERPASS			
- 277.53-C		FERNLEY	DUPONT WAY			
- 277.60-CX	740968V	FERNLEY	PRIVATE CROSSING			
- 277.70-C	740969D	FERNLEY	LINCOLN HIGHWAY			ASPHALT
- 278.10-	740970X	FERNLEY				ASPHALT
- 278.52-CX	740971E	FERNLEY	PRIVATE CROSSING			
- 278.70-CX	740972L	FERNLEY	TRUCKEE STREET			
- 284.60-X	740762W	DARWIN	PRIVATE CROSSING			FULL PLAN
- 287.90-	740763D	HAZEN	CALIFORNIA RD			FULL PLAN
- 313.00-X	740764K	FARRAN	PRIVATE CROSSING			FULL PLAN
- 318.60-	740765S	OCALA	STATE ROUTE 95	2 9	09/24/75	RUBBER
- 328.40-X	740765T	TOY	PRIVATE CROSSING			FULL PLAN
- 331.90-X	740767F	TOY	PRIVATE CROSSING			FULL PLAN
- 335.80-	740768M	GRANITE POINT	DERBY AIRPORT ROAD	2 9	06/07/85	FULL PLAN
- 340.20-	740769U	PERTH	LOWER VALLEY WESTFLD	2 9	06/21/75	RUBBER
- 341.50-	740770N	PERTH	MEADOW ROAD			ASPHALT
- 342.60-	740771V	LOVELOCK	BIG MEADOW ROAD			FULL PLAN
- 343.60-A	753649R	LOVELOCK	I-80 OVERPASS			

RENO RAILROAD CROSSING
ON SOUTHERN PACIFIC
OVERLAND ROUTE



APPENDIX D

VEHICULAR DELAY CALCULATION

↑
Not to Scale

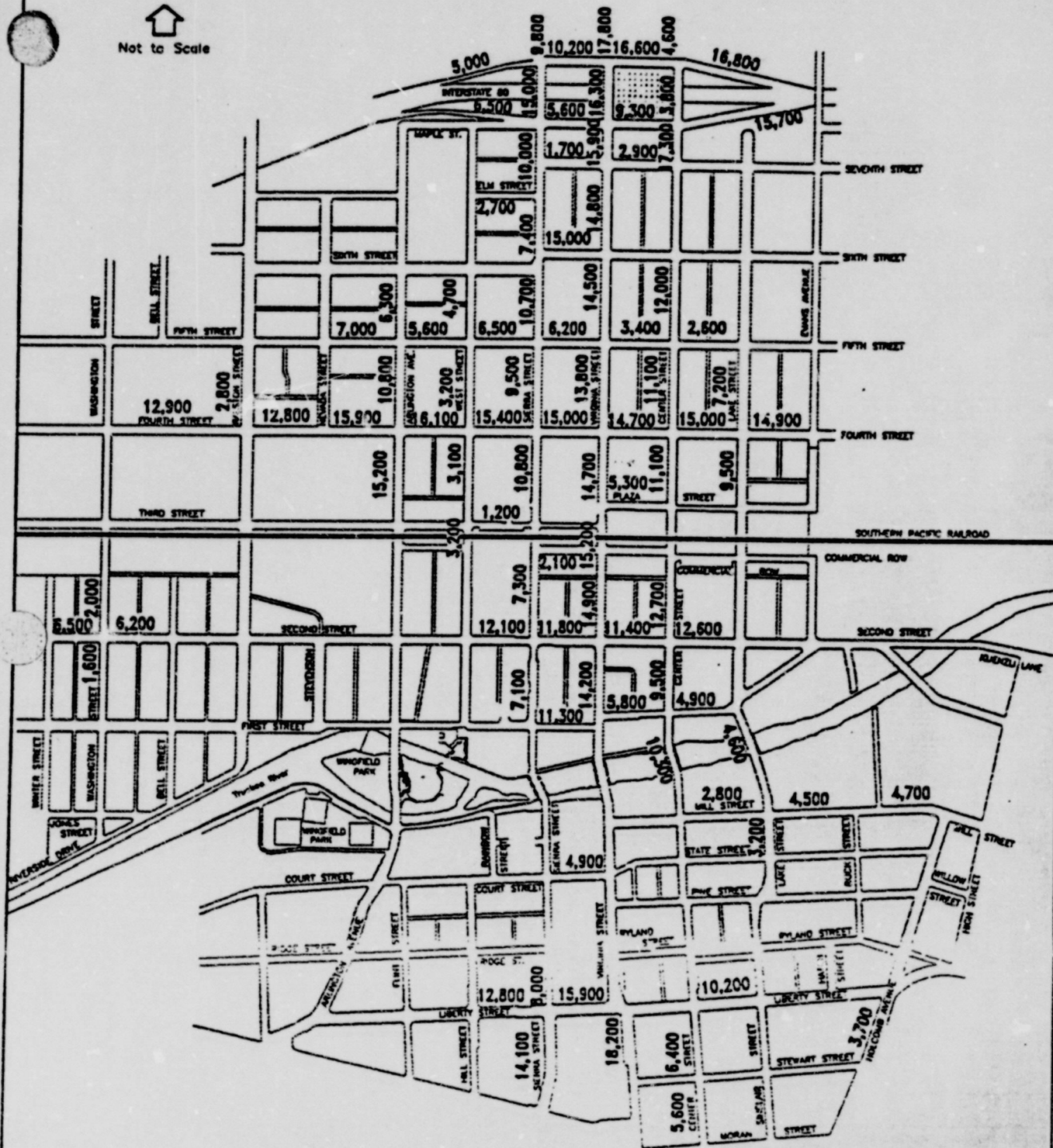


Figure 11
EXISTING AVERAGE DAILY
TRAFFIC VOLUMES

Not to Scale

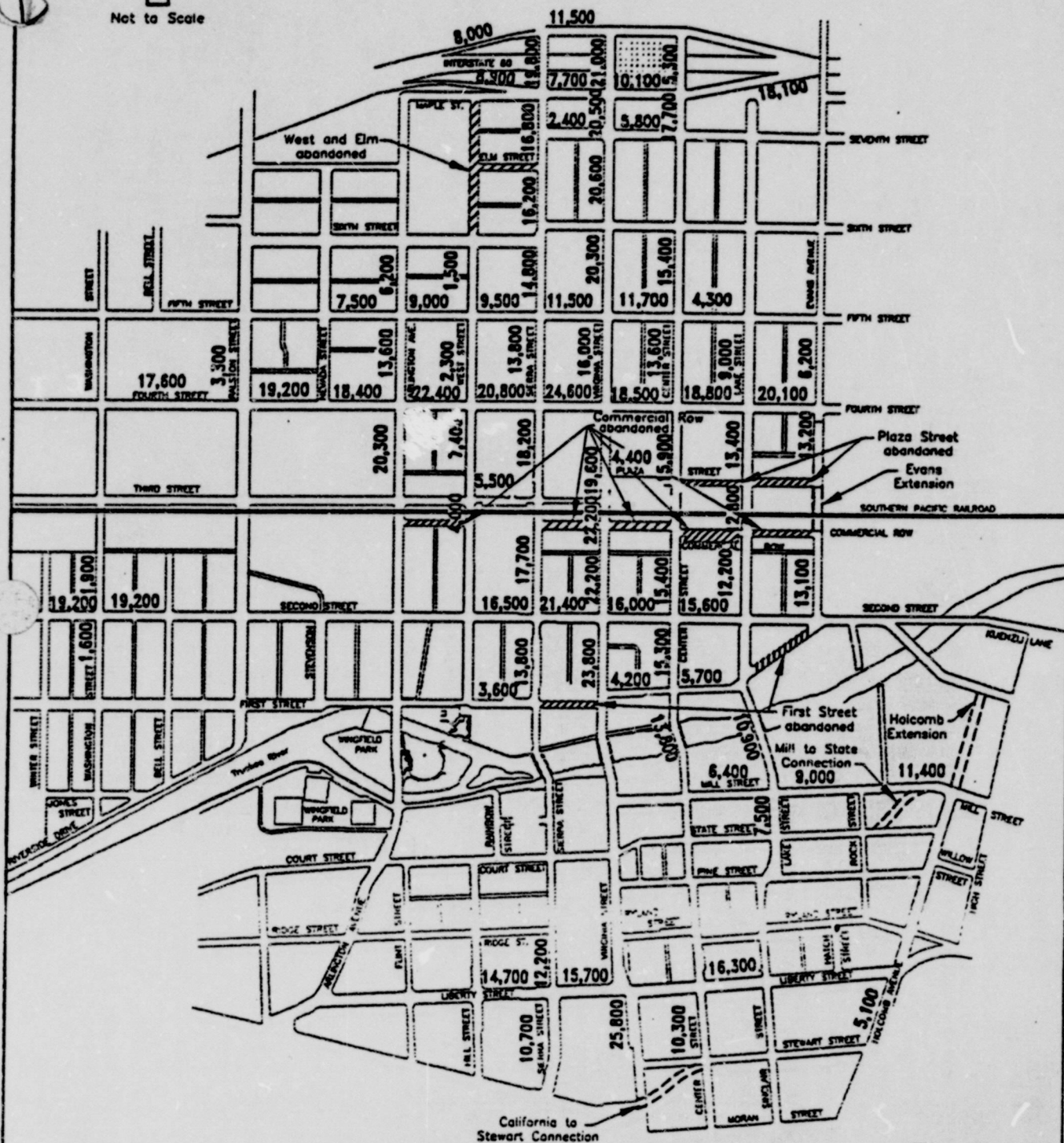


Figure 23

YEAR 2015 AVERAGE DAILY TRAFFIC VOLUMES (Modified Network)



LAKE COUNTY BOARD OF COUNTY COMMISSIONERS



February 14, 1996

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, DC 20423-0001

Attention: Finance Docket No. 32760 - Comments

Dear Ms. Kaiser:

This letter is in response to your request of January 29, 1996, for comments on the potential environmental impacts of the proposed merger, and its related activities, between the Union Pacific and Southern Pacific Railroads. Given the short time frame allowed for a response, we are unable to provide you with information or data pertaining to potential environmental impacts. We have, however, identified several potential environmental concerns which should be evaluated in the Surface Transportation Board's review of the Control and Merger Application.

In your January 29 request, you identify several areas of environmental concern that our comments should address (p.2). The potential impacts of the proposed merger that we identify below may pertain to one or more of the following areas of environmental concern:

- ① Existing local, regional, and national transportation systems
- ② Local land use
- ③ Air emissions and ambient air quality conditions
- ④ Public health and safety, including hazardous materials

The part of the proposed merger that directly affects the City of Leadville and Lake County is the abandonment of the rail lines from Sage to Leadville and from Malta to Canon City (January 29 letter, Attachment 1). As proposed, the abandonment would deprive Lake County of any rail services, which could have substantial adverse impacts on the County and its residents, now and into the future.

COMMISSIONERS

James E. Martin-Chairman • Robert W. Casey • Earl Boeve • Timothy H. Berry-County Attorney
P.O. Box 964 • Leadville, Colorado 80461 • (719) 486-0993 • Fax (719) 486-3972

00

Mining has been an important part of the Lake County economy since the late 1800's. It has provided jobs for generations of Lake County residents and is an important part of our heritage. Although our mining operations have suffered a downturn in recent years, there are still ongoing mining activities. In the time allowed for these comments, we have not determined the extent of present use of the rail lines for mining materials or supplies, but that information should be readily available from the mine operators, or the railroads themselves. Regardless of the current use, the abandonment of the above lines deprives the Lake County area of this transportation resource.

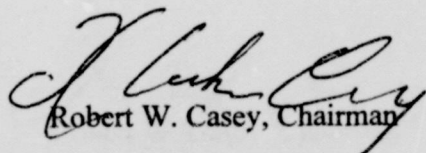
Historically, it is our understanding that ASARCO has shipped by rail up to 400 cars of concentrate per year. The concentrates have a high metal content which raises potential health and environmental concerns in the event of spills. Without the rail lines, the only source of transportation for these concentrates, or other mining related ores or materials, is by truck. The potential increase in truck traffic on our local highways and roads could result in a number of environmental concerns: increased air emissions; increased risks to public health and safety, including potential exposure to high metal content materials; increased environmental risks due to accidents or spills; and increased damage and related costs to our highways, roads, bridges and other infrastructure.

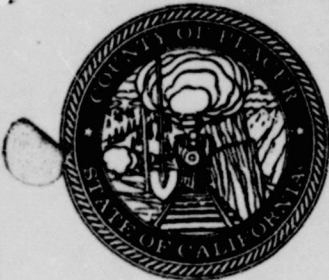
The potential adverse impact of the proposed merger on mining in Lake County pertains not only to current operations, but to our mining future as well. The downturn in mining may not last forever. In fact, there are some indications that mining may have a better future. The lack of rail lines as a potential source of transportation may have a negative impact on the recovery of mining in Lake County.

We are also concerned about the impact the abandonment of the rail lines will have on activities being undertaken at the California Gulch Superfund Site, pursuant to CERCLA. The Denver & Rio Grande Western Railroad (D&RGW) has indicated that it intends to remove certain slag piles and reuse the materials as ballast. If the rail line is abandoned, we are concerned as to how these materials will be moved. If they are transported by truck, then some of the issues raised above with regard to the transport of mining materials would apply. We are also concerned about the impact of the abandonment on the potential cleanup of any remaining slag fines that may be required under CERCLA.

We appreciate the opportunity to provide these comments. Although we do not pretend to have all the answers at the present time, we have attempted to identify potential environmental concerns that must be evaluated.

Sincerely,


Robert W. Casey, Chairman



**PLACER COUNTY
DEPARTMENT OF PUBLIC WORKS**

February 15, 1996

Ms. Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 20423-0001

Attention: Finance Docket No. 32760 - Comments

Dear Ms. Kaiser:

Placer County, California has been following with interest the proposed merger of the Union Pacific (UP) and Southern Pacific (SP) Railroads. We are concerned that post-merger rail traffic will increase substantially on the Roseville, California to Sparks, Nevada route (Donner Route) and on the Roseville to Marysville, California route (Marysville Route). An increase in rail activity on either or both of these routes has the potential to create significant and adverse environmental impacts. These impacts include the following:

Existing Local and Regional Transportation Systems. Both the Donner Route and the Marysville Route have numerous at-grade rail crossings of local and regional roadways. In many circumstances, no alternative roadways are available. Increased blockage of these roadway crossings by more and/or longer trains could result in significant travel delays and congestion. Specific roadways that could experience adverse impacts are listed in Exhibit A, which is attached.

Air Emissions and Ambient Air Quality Conditions. The majority of Placer County is located in a federal Ozone non-attainment area and portions of the County are in non-attainment for State PM₁₀ standards. Increased train activity could lead to an increase in PM₁₀ emissions and an increase in the emission of ozone precursors. In addition, increased delays to vehicular traffic at the above-cited at-grade crossings could also adversely impact air quality.

Noise. Increased train activity will lead to an increase in noise in the vicinity of at-grade crossings due to the train using whistles or horns to provide advance warning.

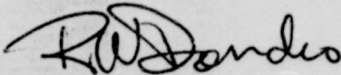
Ms. Elaine K. Kaiser
February 15, 1996
Page 2

Public Health and Safety. Because of the largely rural nature of Placer County, many of the above-cited at-grade crossings are on roadways that provide the only means of access to large areas. Increased blockage of these roadways due to increased train activity (and longer trains) presents public safety concerns for fire, police and medical emergency services. In addition, the increased transport of flammable and hazardous materials pose an impact on the County.

Each of these issues are very important to Placer County. We believe that the environmental documentation for the proposed merger should provide a full discussion of each, including the identification and implementation of appropriate measures to mitigate any adverse impacts.

Thank you for the opportunity to comment on this project. Please feel free to call Mr. Thomas F. Brinkman at 916-889-7514 if you have any questions.

Sincerely,



Rick Dondro
Senior Civil Engineer

RD:TFB:ct

Attachment

cc: Don Lunsford, County Executive Officer
John Marin, Board of Supervisors
Fred Yeager, Planning Director
Dick Swenson, Environmental Health

EXHIBIT A
AT-GRADE CROSSINGS OF SOUTHERN PACIFIC RAIL LINES

Donner Route:

Farron Street in the City of Rocklin
Midas Avenue in the City of Rocklin
Del Mar Avenue in the City of Rocklin
Sierra College Boulevard in the Town of Loomis
King Road in the Town of Loomis
English Colony Road in Placer County
Main Street in the Newcastle area Placer County
Luther Road in Placer County
Auburn Ravine Road in Placer County
Chubb Road in Placer County
Clipper Gap Road in Placer County
Ponderosa Way in Placer County
East and West Weimar Cross Roads in Placer County
West Grass Valley Street in the City of Colfax
East Cape Horn Road in Placer County
Lincoln Road in Placer County
Sacramento Street in Placer County
Main Street in the Dutch Flat area of Placer County
Alta Bonny Nook Road in Placer County

Marysville Route:

Athens Avenue in Placer County
Moore Road in the City of Lincoln
1st, 3rd, 4th, 5th, 6th and 7th Streets in the City of Lincoln
Wise Road in Placer County
SR 65 in Placer County

STB

FD

32760

6-26-96

K

84442

ENVIRONMENTAL MATERIALS 84442
COUNTY OF NEVADA

PLANNING DEPARTMENT

Eric Rood Adm. Bldg.
950 Maidu Avenue
Nevada City, CA 95959-8617
(916) 265-1440
Fax (916) 265-1798

ENTERED Office of the Secretary	
JUN 26 1996	
3	Part of Public Record

February 14, 1996

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3210
Washington, D.C. 20423-0001

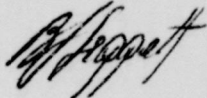
FD 32760

Item No. _____
Page Count 4
Inv# 186

Dear Ms. Kaiser:

We have previously commented on the potential impacts from the U.P. and S.P. merger, and I've attached our two letters to your consultant, Dames & Moore, Inc. Please contact me if you have additional questions.

Sincerely,



Robert Leggett, Assistant Planning Director

cp3\spenviii

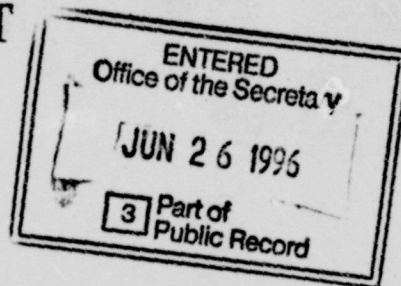


COUNTY OF NEVADA

PLANNING DEPARTMENT

Eric Rood Adm. Bldg.
950 Maidu Avenue
Nevada City, CA 95959-8617
(916) 265-1440
Fax (916) 265-1798

November 22, 1995



Julie Donsky, Environmental Scientist
Dames & Moore
One Continental Towers
1701 Golf Road, Suite 1000
Rolling Meadows, IL 60008

Re: Environmental Issues on the Union Pacific and Southern Pacific Railroads' Donner Pass Tunnel Project

Dear Ms. Donsky:

This is in response to your October 30, 1995 letter requesting comments on the potential environmental impacts of this project. Your description states that the project will "remove snow sheds, increase the clearance in tunnels and construct by-passes." Your maps for the area affecting Nevada County show only three tunnels in our county, and no indication of snow shed removal or by-pass construction. If that's correct, then our comments are as follows:

1. Tunnels 35, 36, and 37 are located in the vicinity of two habitats that may support federal or state listed wildlife species, the Wolverine and the Monadenia Mormonum Buttoni (no common name). I've attached a copy of a map relating to this from our County General Plan (Special Status Species). As you can see, this information is from the California Department of Fish and Game, and not from our detailed investigations of the habitats. Therefore, we can't advise about actual locations or potential impacts and mitigations, so for more specifics please contact Fish and Game.
2. Tunnel 41, in the Norden area, is at the head waters of the South Fork Yuba River, but outside of Nevada County. However, as you can see from our second map (Drainage Basins), it traverses a large portion of the county, and provides both recreation and water supply throughout most of its course. Our concern is that the project not result in either an activity or the deposition of any material that would degrade this water quality. Is there any potential for hazardous substances to leach out from newly deposited and exposed materials? Will the excavated material be removed from the site? Will any material deposited on site be likely to erode into the river?

Although this map shows Lake Van Norden, its dam was breached several years ago, and there's no formal plan to reconstruct it. It exists today as a large meadow.

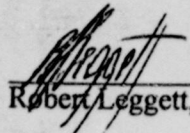
3. Tunnel 42 is in Placer County, but above Donner Lake State Park, and the town of Truckee, in Nevada County. I expect that both entities will want to review your plan, and will therefore defer comment to them.

Thanks for the opportunity to review and comment on your project. Please contact me at the address above, or by phone at (916) 265 1345, if you have questions on these issues.

Very truly yours,

Thomas Miller, Acting Planning Director

By:


Robert Leggett, Assistant Planning Director

TM/RL:dk

Enclosures

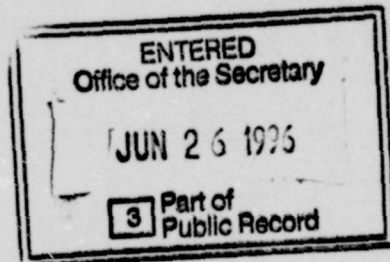
cc: Supervisor Sam Dardick

COUNTY OF NEVADA

PLANNING DEPARTMENT

Eric Rood Adm. Bldg.
950 Maidu Avenue
Nevada City, CA 95959-8617
(916) 265-1440
Fax (916) 265-1798

December 26, 1995



Julie Donsky, Environmental Scientist
Dames & Moore
1701 Golf Road, Suite 1000
Rolling Meadows, IL 60008

Re: Additional Environmental Issues on the Union Pacific and Southern Pacific Railroads' Donner Pass Tunnel Project and Route Expansion

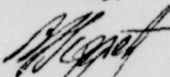
Dear Ms. Donsky:

This is in response to your letter of November 27, 1995, inquiring about what issues would be raised by the increased route activity on this rail line. I believe that my previous letter covers the issues that concern this county (I've attached a copy, not including my original map attachments). We foresee no additional issues beyond those listed in that letter.

However, since the line runs through the town of Truckee (an incorporated town within this county), and has surface crossings which presently affect their traffic, I'm sure that they will want to review and comment on your plan.

Again, thanks for keeping us informed and for the opportunity to comment

Sincerely,


Robert Leggett
Assistant Director

Attachment

CC: Board of Supervisors
Town of Truckee

STB

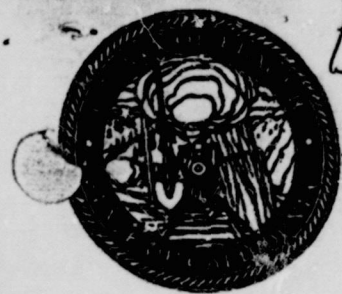
FD

32760

6-26-96

K

84441



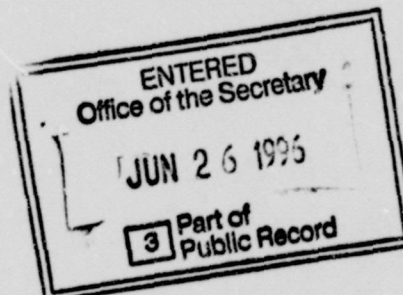
ENVIRONMENTAL MATERIALS

PLACER COUNTY DEPARTMENT OF PUBLIC WORKS

84441

February 15, 1996

Item No. _____

Page Count 4Jan # 185

Ms. Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 20423-0001

Attention: Finance Docket No. 32760 - Comments

Dear Ms. Kaiser:



Placer County, California has been following with interest the proposed merger of the Union Pacific (UP) and Southern Pacific (SP) Railroads. We are concerned that post-merger rail traffic will increase substantially on the Roseville, California to Sparks, Nevada route (Donner Route) and on the Roseville to Marysville, California route (Marysville Route). An increase in rail activity on either or both of these routes has the potential to create significant and adverse environmental impacts. These impacts include the following:

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Ms. Elaine K. Kaiser

February 15, 1996

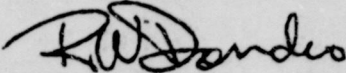
Page 2

Public Health and Safety. Because of the largely rural nature of Placer County, many of the above-cited at-grade crossings are on roadways that provide the only means of access to large areas. Increased blockage of these roadways due to increased train activity (and/or longer trains) presents public safety concerns for fire, police and medical emergency services. In addition, the increased transport of flammable and hazardous materials pose an impact on the County.

Each of these issues are very important to Placer County. We believe that the environmental documentation for the proposed merger should provide a full discussion of each, including the identification and implementation of appropriate measures to mitigate any adverse impacts.

Thank you for the opportunity to comment on this project. Please feel free to call Mr. Thomas F. Brinkman at 916-889-7514 if you have any questions.

Sincerely,



Rick Dondro
Senior Civil Engineer

RD:TFB:ct

Attachment

cc: Don Lunsford, County Executive Officer
John Marin, Board of Supervisors
Fred Yeager, Planning Director
Dick Swenson, Environmental Health

EXHIBIT A
AT-GRADE CROSSINGS OF SOUTHERN PACIFIC RAIL LINES

Donner Route:

Farron Street in the City of Rocklin
Midas Avenue in the City of Rocklin
Del Mar Avenue in the City of Rocklin
Sierra College Boulevard in the Town of Loomis
King Road in the Town of Loomis
English Colony Road in Placer County
Main Street in the Newcastle area Placer County
Luther Road in Placer County
Auburn Ravine Road in Placer County
Chubb Road in Placer County
Clipper Gap Road in Placer County
Ponderosa Way in Placer County
East and West Weimar Cross Roads in Placer County
West Grass Valley Street in the City of Colfax
East Cape Horn Road in Placer County
Lincoln Road in Placer County
Sacramento Street in Placer County
Main Street in the Dutch Flat area of Placer County
Alta Bonny Nook Road in Placer County

Marysville Route:

Athens Avenue in Placer County
Moore Road in the City of Lincoln
1st, 3rd, 4th, 5th, 6th and 7th Streets in the City of Lincoln
Wise Road in Placer County
SR 65 in Placer County



..... FAX FROM PLACER COUNTY DPW

DATE: 15 Feb 96

TIME: _____

RECEIVING PHONE NO: _____

TO: Ms. Elaine Kaiser (202-927-6225)FROM: Rick DondroSUBJECT: Finance Docket No. 32760 - Comments

COMMENTS: _____

_____TOTAL # OF SHEETS INCLUDING COVER SHEET: 4IF YOU HAVE ANY QUESTIONS, PLEASE CALL (916) 889- 7514
(Tom Brinkman)

PLACER COUNTY DPW FAX # IS (916) 885-3159

STB

FD

32760

6-26-96

K

84440

ENVIRONMENTAL MATERIALS

84440



Acadia Parish Police Jury

Post Office Box A

Crowley, Louisiana 70527-6001

OFFICE: (318) 788-8800

FAX: (318) 788-2421



GLEN BIHM

President

JOHN W. HUMBLE, SR.

Vice-President

KATRY MARTIN

Secretary-Treasurer

DISTRICT 1

JOSEPH CHARLES JOHNSON

P.O. Box 2372

Crowley, LA 70526

(318) 788-1228

DISTRICT 2

CATHERINE R. LACOMBE

P.O. Box 155

Egan, LA 70531-0155

(318) 783-4564

DISTRICT 3

JOHN W. HUMBLE, SR.

P.O. Box 253

Morse, LA 70559-0274

(318) 783-4238

DISTRICT 4

DAVID LEE BROUSSARD

222 Apple Drive

Crowley, LA 70526

(318) 334-8119

DISTRICT 5

CURTIS PELLERIN

2329 Grand Prairie Hwy.

Rayne, LA 70578

(318) 334-2392

DISTRICT 6

CHARLES A. LABBE

164 Cypress Lane

Church Point, LA 70525

(318) 684-3429

DISTRICT 7

GLEN BIHM

2630 Perchville Road

Eunice, LA 70535

(318) 457-4353

DISTRICT 8

CLAUDE "JIMMY" COURVILLE

2754 Fournerat

Eunice, LA 70535

(318) 457-9724

(318) 457-1155

February 13, 1996

ENTERED
Office of the Secretary

JUN 26 1996

3 Part of
Public Record

Ms. Elaine K. Kaiser,
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, DC 20423-0001

RE: Surface Transportation Board Request for Environmental Comments
on the Potential Environmental Impacts of the Control & Merger
Application between the Union Pacific & Southern Pacific Railroads
Attention: (Finance Docket No. 32760) - Comments

Dear Ms. Kaiser:

These comments are in response to the proposed merger of Union Pacific Railroad Company and Southern Pacific Transportation Company and its potential environmental impacts on our area.

After conversation with Mr. Winn Frank it is understood that:

Approximately 11 trains now operate from the IOWA junction to Lafayette.

UP/SP operations will decrease approximately 50%

BNSP will begin operations increasing approximately five trains

An increase in inter-modal and non-stoppers through area.

Subsequently, no net change in rail traffic or differences in existing cargo will be realized. As a result, Acadia Parish of Louisiana will see no additional adverse impact due to the merger of UP/SP. However, should plans change or our information is incorrect, we would wish to reconsider our position.

Item No. _____

Page Count 2

Sur # 184



RECYCLED

"AN EQUAL OPPORTUNITY EMPLOYER"

Ms. Elaine K. Kaiser
February 13, 1996
Page 2

We hope this will be of assistance to you.

Sincerely,

Katry Martin
Katry Martin
Secretary-Treasurer

mtl
xc: Police Jurors

STB

FD

32760

6-26-96

K

8443939

ENVIRONMENTAL MATERIALS

SEVERSON & WERSON

84439

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

ONE EMBARCADERO CENTER

SAN FRANCISCO, CALIFORNIA 94111

FAX (415) 956-0439

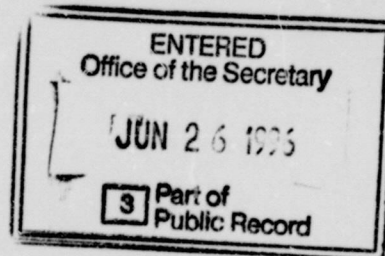
TELEPHONE (415) 398-3344

Item No. _____

Page Count 7

144 #183

LARRY W. TELFORD
DIRECT NO. (415) 677-5605



February 15, 1996

VIA FACSIMILE - ORIGINAL TO FOLLOW BY FEDERAL EXPRESS

Elaine K. Kaiser
UP/SP Environmental Project Coordinator
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 20423-0001



Re: Finance Docket No. 32760 - Comments; Town of Truckee, California

Dear Ms. Kaiser:

This firm represents the Town of Truckee in connection with the subject merger proceeding, and filed a Notice of Intent to Participate on behalf of the Town with the Board on January 8, 1996. I have been regularly receiving copies of pleadings from the parties, as well as copies of Decisions and Orders issued by the Board. On Tuesday, February 13, I became aware of your letter of January 29, 1996 addressed to Ms. Karen Knecht, Board of Supervisors Chair, Nevada County, California requesting information regarding potential environmental impacts of the proposed merger. Apparently copies were not delivered to the service list of parties intending to participate. Since there are many independently incorporated cities and towns which may suffer adverse environmental impacts as a result of the merger I am surprised at the limited distribution of your letter. In many of our California counties the county seat may be quite some distance away (as in this case, where Nevada City is literally on the other side of the Sierra Nevada from Truckee), and the County government may not be particularly aware of urgent environmental concerns of all the municipalities within its boundaries.

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SEVERSON & WERSON

A PROFESSIONAL CORPORATION

Elaine K. Kaiser
February 15, 1996
Page 2

Truckee's concerns with the merger. The purpose of this letter is to call to your attention in a general way the serious consequences of the merger on the air quality non-attainment status of Air Quality Control Region ("ACQR") 508 in which Truckee is located.

The principal difficulty with the proposed merger from Truckee's perspective is the substantial adverse impact of increased rail traffic through Truckee and on the California State Highway 267 grade crossing of the SP's Donner Summit line. The Highway 267 grade crossing is located near the east end of Truckee, and crosses SP's mainline tracks in a north-south direction. Immediately north of the crossing is a "T" intersection of the highway and Donner Pass Road, a highly congested two lane road which is the main street through Truckee's historic commercial center. Truckee is the gateway to the North Lake Tahoe resort area. Travelers coming from the metropolitan areas of Northern California and from Reno and points east on Interstate 80 bound for the Northstar ski resort area and the North Lake Tahoe resort area must leave the Interstate, travel over Donner Pass Road through the historic commercial center of Truckee, and thence over this crossing to reach their destinations. Highway 267 and the crossing also serve the Truckee-Tahoe Airport, as well as developing commercial and residential areas to the south of the SP tracks and the Truckee River, which parallels the railroad at this location. All of the emergency service providers serving the Truckee area are located on the north side of the crossing. A substantial volume of the calls for ambulance, fire and police services originates south of the crossing.

California Department of Transportation records for 1994 indicate that an average of 16,900 vehicles per day used the Highway 267 grade crossing. An environmental impact report prepared for the Town reported that the intersections on either side of the crossing were operating at peak hour levels of service near or at capacity (LOS "D" or "E"). At these traffic levels, any significant increase in crossing blockage time will result in LOS "F" (failure mode) of these and other adjacent intersections due to traffic queuing for the crossing. A study performed for Truckee on February 7, 1996 in connection with this proceeding revealed that the crossing was blocked during the afternoon commute hours fourteen percent of the time. California Highway Patrol accident statistics reveal 94 reported accidents in the last ten years at the Donner Pass Road and East/West River Street intersections adjacent to the crossing.

The Applicants' evidence indicates a present rail traffic volume over the Donner Summit line of 13.6 trains per day, estimated to increase to 22.6 trains per day upon consummation of the merger. Truckee believes the Applicants' evidence significantly understates the increase in train traffic which will occur over time. Further, we note that the Applicants' estimate does not include any BNSF trains which will use this line as a result of the trackage rights agreement between the Applicants and that carrier. That agreement

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Elaine K. Kaiser

February 15, 1988

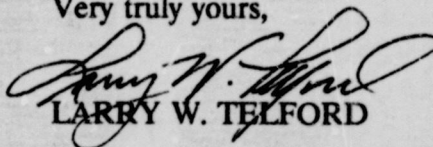
Page 3

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The historic commercial center of Truckee already experiences total gridlock because of this crossing with existing rail traffic flows, with accompanying contributions to the non-attainment status of Ozone (O_3) levels in ACQR 508 arising from stalled traffic. Ozone is formed during a photochemical reaction between Nitrogen Oxides (NO_x) and Hydrocarbons (HC) in the presence of sunlight. According to the merger application and some simple calculations, a typical two mile stretch of railroad through Truckee could add over 16 tons per year of HC and NO_x to the air as a result of an additional nine 6,000 ton trains per day. This number does NOT include additional pollutants from idling vehicles waiting in traffic due to the blocked crossing, which are estimated to be significant. Truckee is studying the additional pollutants expected from idling traffic, and the results of this study will be included in its verified statements. A traffic study performed in an adjacent City on this line showed an anticipated 340% increase in vehicular delay as a result of the increased rail traffic volumes expected from the merger. Truckee believes that this figure could be much higher in Truckee because of the gridlock potential at intersections adjacent to the crossing. Increased crossing blocking proportional to a train traffic increase from 14 to 32 trains per day could result in the Highway 267 crossing being blocked 32% of the time. Increased vehicular delay would result in a proportional increase in air pollutants due to vehicles idling.

Truckee believes that because of its unique geographical situation, with the SP tracks and the Truckee River isolating a major part of the community from the rest of the Town, and with the only east end access between the two parts being over the Highway 267 crossing, the consummation of the merger will inevitably result in a significant worsening of the existing grid lock condition and Ozone non-attainment status, and therefore presents a matter which requires detailed study in the Environmental Analysis being prepared by your group.

Very truly yours,


LARRY W. TELFORD

SEVERSON & WERSON
A Professional Corporation
One Embarcadero Center
San Francisco, California 94111

Telephone
(415) 398-3344

Fax No.
(415) 956-0439

Telecopier
(Groups 1-3)

FACSIMILE TRANSMISSION

Date: February 15, 1996 Time: 1:03pm No. of Pages: 4
(Including this page)

TO: Elaine K. Kaiser, STB Section of Environmental Analysis

FAX NO. 202/927-6225

FROM: Larry W. Telford, Esq.

OUR REFERENCE: 09662.0001; STB Finance Docket 32760; UP/SP

COMMENTS:

**IF YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL THE PERSON
SENDING THE DOCUMENTS.**

IMPORTANT NOTICE

THIS FACSIMILE TRANSMISSION IS INTENDED ONLY FOR THE PERSON TO WHOM IT IS ADDRESSED. THIS FAX MAY CONTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL, OR EXEMPT FROM DISCLOSURE BY APPLICABLE LAW. UNLESS YOU ARE THE INTENDED RECIPIENT OF THIS FAX, DO NOT READ, USE, DISTRIBUTE, OR COPY IT. IF YOU HAVE RECEIVED THIS FAX BY MISTAKE, THEN PLEASE CALL US IMMEDIATELY AT (415) 398-3344 (COLLECT) AND RETURN THE ORIGINAL FAX TO US AT THE ABOVE ADDRESS. THANK YOU.

SEVERSON & WERSON

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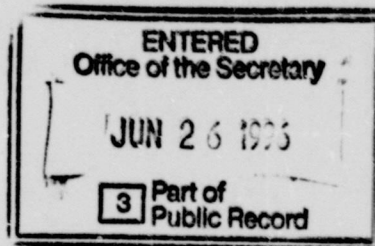
ATTORNEYS AT LAW

ONE EMBARCADERO CENTER

SAN FRANCISCO, CALIFORNIA 94111

FAX (415) 956-0439

TELEPHONE (415) 398-3344



LARRY W. TELFORD
DIRECT NO. (415) 677-5605

February 15, 1996

VIA FACSIMILE - ORIGINAL TO FOLLOW BY FEDERAL EXPRESS

Elaine K. Kaiser
UP/SP Environmental Project Coordinator
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 20423-0001

Re: Finance Docket No. 32760 - Comments: Town of Truckee, California

Dear Ms. Kaiser:

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Elaine K. Kaiser
February 15, 1996
Page 2

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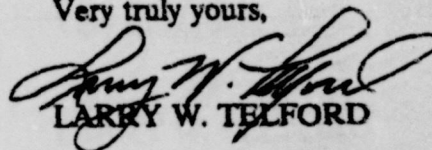
Elaine K. Kaiser
February 15, 1996
Page 3

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Very truly yours,


LARRY W. TELFORD

STB

FD

32760

6-26-96

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84437

ENVIRONMENTAL MATERIALS 84437

Cowlitz-Wahkiakum Council of Governments

ADMINISTRATION ANNEX
207 NORTH FOURTH AVENUE
KELSO, WA 98626-4195

Item No. _____

Page Count 3

Jun 4 1996

PHONE (360) 577-3041
SCAN 862-3041
FAX (360) 425-7760
TDD PHONE (360) 577-3061

COWLITZ
COUNTY

February 14, 1996

CITY OF
LONGVIEW

CITY OF
KELSO

CITY OF
CASTLE ROCK

CITY OF
WOODLAND

CITY OF
KALAMA

TOWN OF
CATLAMET

PORT OF
LONGVIEW

PORT OF
KALAMA

PORT OF
WOODLAND

COWLITZ
COUNTY
PUD NO. 1

LONGVIEW
SCHOOL
DISTRICT

KELSO
SCHOOL
DISTRICT

WOODLAND
SCHOOL
DISTRICT

CASTLE ROCK
SCHOOL
DISTRICT

BEACON HILL
SEWER DISTRICT

WAHIAKUM
COUNTY
PORT NO. 1

WAHIAKUM
COUNTY
PORT NO. 2

WAHIAKUM
COUNTY
PUD NO. 1

WAHIAKUM
COUNTY

Elaine E. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 20423-0001

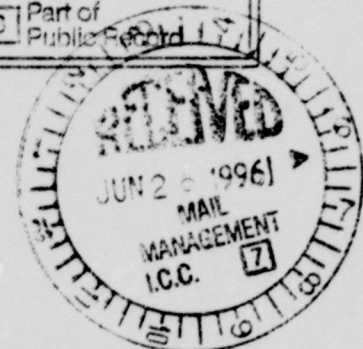
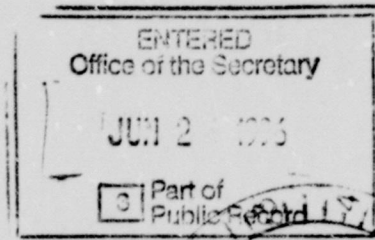
Attention: Finance Docket No. 32760 - Comments

Dear Ms. Kaiser:

We were informed by the Cowlitz County Commissioners of this opportunity to comment on the environmental impacts of the proposed merger of the Union Pacific and Southern Pacific Railroads. The Council of Governments serves as the metropolitan planning organization for the Longview-Kelso-Rainier, Oregon urban area and lead agency for the Southwest Washington Regional Transportation Planning Organization (SWRTPO). The SWRTPO includes Cowlitz and Lewis counties which are traversed by the Burlington Northern/Santa Fe mainline.

The summary material in Attachment 1 indicates the primary impact of the merger upon the rail line segment between Seattle and Portland, Oregon, will be an unspecified increase in traffic. We are presently working with BN/SF and UP on a variety of alternatives to improve rail service off of the mainline into the Port of Longview and nearby industries and businesses. Development proposals in the industrial area may involve the addition of 7,000 foot long unit trains plus overall increases in rail traffic to serve growing production and import/export activities. The BN/SF projects a 10 percent average annual increases in mainline trips. The unspecified increased traffic due to the merger, plus the current projected annual growth and the addition of traffic in the Longview-Kelso-Kalama region demands that this situation be addressed in the upcoming environmental analysis.

With this level of expected growth in freight traffic and the initiative to increase passenger rail trips, we urge that steps be taken to add capacity to the rail system to accommodate this growth. Item No. 5, Rail Line Construction Projects, however, indicates no construction projects are planned for the state of Washington. The public and private sectors in this region are already working together to address off-system rail transportation and the state Department of Transportation has identified a third freight track between Kalama and Longview-Kelso as the third highest priority in its Cascadia

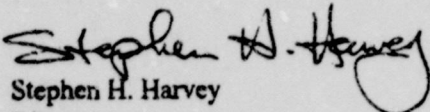


Elaine Kaiser
February 14, 1996
Page 2

Corridor rail improvements program. We emphasize the need for the merged company to work with state and local public and private interests to see that the track project is accomplished in time to meet growth projections.

Thank you for the opportunity to comment on the environmental effects of the proposed merger. Should you or others have any questions, please contact me or Rosemary Brinson Siipola at (360) 577-3041.

Sincerely yours,


Stephen H. Harvey
Director

SHH:nh

cc: Ireda Grohs, CWCOC Chair
Cowlitz County Commissioners
Jim Slakey, Public Transportation and Rail Division, WSDOT
Rosemary Brinson Siipola

626MERGE.SH2

Cowlitz-Wahkiakum Council of Governments

ADMINISTRATION ANNEX
2100 N. H. FOURTH AVENUE
KELSO, WA 98626

PHONE (360) 577-3041
SCAN 562-3041
FAX (360) 425-7760
TDD PHONE (360) 577-3061

FD 32760

COWLITZ
COUNTY

CITY OF
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KELSO

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CASTLE ROCK
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WOODLAND

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SEWER DISTRICT

WAHIAKUM
COUNTY
PORT NO. 1

WAHIAKUM
COUNTY
PORT NO. 2

WAHIAKUM
COUNTY
PUD NO. 1

WAHIAKUM
COUNTY

TELEFAX COVER SHEET

DATE: February 14, 1996

TO: Elaine E. Kaiser

UP/SP Environmental Project Director

Section of Environmental Analysis

Surface Trans. Board

FAX#: (202) 927-6225

FROM: Stephen H. Harvey, Director

CWCOG

COMMENTS:

Attached is a 2 page document. Please deliver to the above named recipient. Thank you.

FAX NUMBER IS:

(360) 425-7760

STB

FD

32760

6-25-96

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84426



ENVIRONMENTAL MATERIALS

Mesa County, Colorado

84426

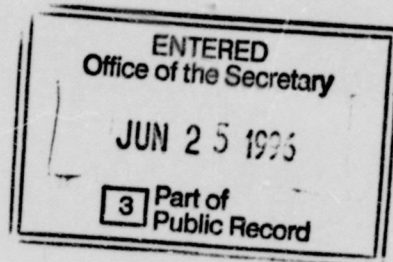
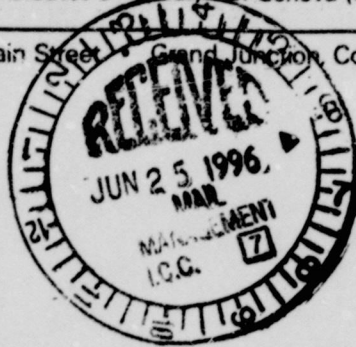
BOARD OF COUNTY COMMISSIONERS

District 1 - John R. Crouch (303) 244-1605

District 2 - Kathryn H. Hall (303) 244-1604

District 3 - Doralyn B. Genova (303) 244-1606

P.O. Box 20,000 • 750 Main Street • Grand Junction, Colorado 81502-5010 • FAX (303) 244-1639



February 12, 1996

Ms. Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 20423-0001

Subject: Finance Docket No. 32760 - Comments

Item No. _____
Page Count 1
177

Dear Ms. Kaiser:

Thank you for the opportunity to comment on the impacts of the proposed UP/SP merger. The data supplied to Mesa County from DeLeuw, Cather & Company indicates that the activity at the existing SP rail yard in Grand Junction, Colorado will increase by more than 20%. The impact on Mesa County citizens will be significant. The urban area of Mesa County has a population in excess of 80,000. The population is distributed in an area bisected by the SP rail line and rail yard. The majority of our rail/highway crossings are at grade. The conflicts that arise from this situation, given the present level of rail traffic, are significant.

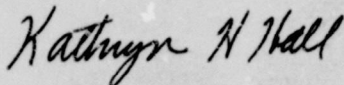
Specifically, our concern is focused on one at grade rail crossing that serves a major population center of our county. It is located adjacent to the east end of the SP rail yard, at Mesa County Road 30 and the SP mainline. It is not unusual for this crossing to be blocked by rail yard activity, on a daily basis, for periods of time in excess of twenty minutes. This is a major threat to public safety, and impacts both law enforcement efforts in the region and emergency vehicle response time. We have repeatedly raised this issue with the SP, but railroad response and assistance has been less than forthcoming. They explain the blocking of the road by the trains as "the result of rail yard operations". We have a real concern that increases in rail yard operations will result in exacerbating an already dangerous situation at this location, and make the situation intolerable. If the merger is approved, we request that two conditions of the merger be:

1. The UP/SP cooperate with Mesa County in locating a site for a grade separated crossing over the Grand Junction rail yard; and
2. The UP/SP participate with Mesa County in financing the construction of a grade separated crossing to alleviate the impacts to local traffic caused by increased rail yard operations.

Ms. Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
February 12, 1996
Page 2

Thank you for the opportunity to comment on the proposed merger. The results of your review are extremely important to us. Please keep us informed as to the response to our comments and the final disposition of the merger under consideration.

Sincerely,



Kathryn H. Hall, Chairman
Board of Commissioners

cc: Commissioners Doralyn Genova and John Crouch
Senator Campbell
Senator Brown
Representative McInnis
Representatives
Governor Romer
Senator Bishop
Representative Foster
Representative Prinster
Secretary of Transportation
Colorado Public Utilities Commission
Bob Jasper, County Administrator
Joe Crocker, Public Works Director

STB

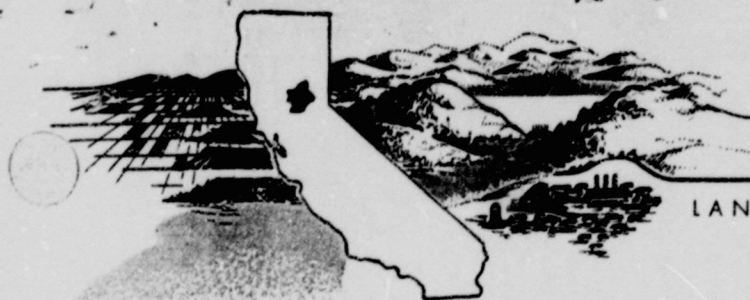
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6-25-96

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84424

Butte County

LAND OF NATURAL WEALTH AND BEAUTY

DIRECTOR'S OFFICE**DEPARTMENT OF DEVELOPMENT SERVICES**

7 COUNTY CENTER DRIVE - OROVILLE, CALIFORNIA 95965-3397

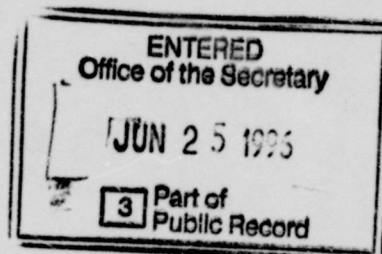
TELEPHONE: (916) 538-7601

FAX: (916) 538-7785

ENVIRONMENTAL MATERIALS

February 21, 1996

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 20423-0001

**Attention: Finance Docket No. 32760 - Comments**

Dear Ms. Kaiser:



The proposed merger between Union Pacific and Southern Pacific Railroads will not result in any new track construction nor any track abandonments within Butte County. The object of the merger is to optimize rail traffic on a national level with a resulting decrease in overall fuel usage and an increase in shipping efficiency. There will be increases of rail traffic on some rail segments and decreases on others. Butte County will experience an increase in rail traffic on the Marysville to Dunsmuir segment which passes through Gridley, Durham, and Chico. The increase is projected at 5.2 trains per day as compared to the existing volume of 16.7 trains per day. Locally, there will be an increase in associated emissions of air pollutants along the rail line but, when all train traffic within Sacramento Air Quality Control Region is considered, the merger is expected to result in a decrease in nitrous oxide emissions.

Noise will also increase along this section of track through the environmental study did not analyze the increase because the increase in train traffic did not meet the threshold point as determined by the Interstate Commerce Commission.

The environmental documents prepared for the project also assessed the potential for increased accidents. Based on a nation wide increase of approximately 6.2 million miles of travel and an accident rate of 4 accidents per million miles, about 25 accidents per year can be anticipated. In 1994, there were a total of 2,669 accidents, so this increase is not considered significant.

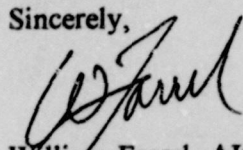
Item No. _____

Page Count 1Jun 4 1995

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
February 21, 1996
Page 2

In closing, we appreciate being able to comment on the above-referenced docket, however, we would like to continue to be able to review and comment on future environmental documents. Thank you!

Sincerely,



William Farrel, AICP
Director of Development Services

WF:jb

cc: John Blacklock, Chief Administrative Officer

STB

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• 32760

6-25-96

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• 84420

ENVIRONMENTAL MATERIALS

84420



Mel Carnahan, Governor • David A. Shorr, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF STATE PARKS

P.O. Box 176 Jefferson City, 65102-0176 (573) 751-2479

FAX (573) 751-8656

February 26, 1996

Ms. Elaine K. Kaiser
Chief, Section of Environmental Analysis
Surface Transportation Board
Washington, DC 20423-0001

ENTERED
Office of the Secretary

JUN 25 1996

3 Part of
Public Record

Subject: Surface Transportation Board Request for Environmental Comments on the Potential Environmental Impacts of the Control and Merger Application between the Union Pacific and Southern Pacific Railroads (Finance Docket No. 32760)

Dear Ms. Kaiser:

The Department of Natural Resources, Division of State Parks, has reviewed the request for environmental comments. We offer our review of the potential environmental impacts surrounding the merger application between the Union Pacific and Southern Pacific Railroads.

The Historic Preservation Program's comment relates to the phase-out of existing Union Pacific rail yard on Lesperance Street in St. Louis. We are concerned that this phase-out will result in demolition or abandonment/surplusing. If so, a review of the rail yard needs to occur to determine if it has any historic significance.

The Outdoor Recreation Grant Program has also reviewed the information supplied. Listed below are the cities and parks located within a quarter mile of the railroad tracks that have utilized federal grant funds through the Land and Water Conservation Fund program.

<u>City</u>	<u>Facility</u>
Dexter	Airport Park
Dexter	Boon city Park
Dexter	Dudley Community Park
Poplar Bluff	Eugene Field Recreation Area
Poplar Bluff	Koors Whitley Park
Poplar Bluff	Ridge Property
Poplar Bluff	Hillcrest Pool
Poplar Bluff	Poplar Bluff Municipal Golf Course
Poplar Bluff	Popular Bluff Soccer Field Complex
St Louis	Tower Grove Park
St Louis	Neighborhood Park
St Louis	Walnut Park



Item No. _____

Page Count 2

Jun 27

Ms. Elaine K. Kaiser
February 26, 1996
Page 2 of 2

County:

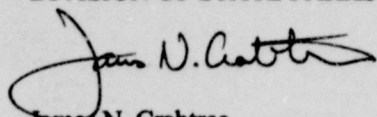
Facility

St Louis	Brentwood Park System
St Louis	Olivette Public Park
St Louis	Central Park
St Louis	Warson Park
St Louis	Vinita Park
St Louis	Bella Park
St Louis	Deer Creek Park
St Louis	Oakhaven Park
St Louis	Wellston Park
St Louis	Rock Hill Oak Trail Nature Park
St Louis	G. Sweet Park

If you have any questions, do not hesitate to contact me at (573) 751-5374.

Sincerely,

DIVISION OF STATE PARKS



James N. Crabtree
Director
Planning and Development Program

JNC:wg

c: Tom Lange, Planner, Department of Natural Resources
Doug Eiken, Director, Division of State Parks

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6-25-96

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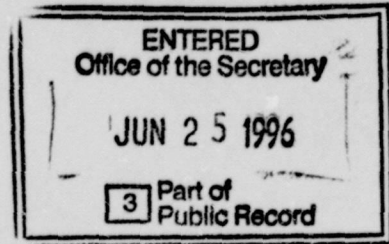
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March 4, 1996

Elaine K. Kaiser
Chief, Section of Environmental Analysis
Surface Transportation Board
Washington, D.C. 20423-0001



RE: The Control and Merger Application between Union Pacific and Southern Pacific Railroads; STB

Dear Ms. Kaiser:

ENVIRONMENTAL MATERIALS

**ARIZONA
STATE
PARKS**

1300 W. WASHINGTON
PHOENIX, ARIZONA 85007
TELEPHONE 602-542-4174

FIFE SYMINGTON
GOVERNOR

STATE PARKS
BOARD MEMBERS

RUKIN JELKS
CHAIR
ELGIN

BILLIE A. GENTRY
SCOTTSDALE

WILLIAM G. ROE
TUCSON

JOSEPH H. HOLMWOOD
MESA

SHERI J. GRAHAM
SEDONA

RUTH U. PATTERSON
ST. JOHNS

M. JEAN HASSELL
STATE LAND COMMISSIONER

KENNETH E. TRAVOUS
EXECUTIVE DIRECTOR

CHARLES R. EATHERLY
DEPUTY DIRECTOR

Thank you for consulting with this office on the possible environmental impacts of the above referenced merger. Pursuant to 36 CFR Part 800, the implementing rules and regulations for Section 106 of the National Historic Preservation Act, our office is concerned with impacts to cultural resources, be they prehistoric or historic in age. Thus, I have reviewed the extensive documentation that you sent for proposed Arizona projects and have the following comments, again pursuant to 36 CFR Part 800:

1. In general, our office needs to be consulted on those projects that will involve new ground disturbance/impacts to lines over 0.5 miles in length and/or over 1.0 acres in area. If, however, any railroad lines that are over 50 years in age will be impacted, then those projects also need to come to our office for review and comment, as the lines may be eligible for, or listed on, the National/State Registers of Historic Places.

2. Based upon a check of our cultural resource files and on professional judgment, the likelihood appears fairly good that cultural resources may be located within many of the project areas for which you are proposing ground disturbance. In addition, our records check indicates that much of this area has never been surveyed for cultural resources.

3. Therefore, it is my recommendation that any proposed project (associated with changes resulting from this merger) that has the potential to disturb ground that has not been impacted previously, be surveyed by a qualified archaeologist in order to locate and evaluate any existing cultural remains (i.e., archaeological sites and/or historic railroad-associated features, camps, etc.). Attached is a list of consulting archaeologists who could do the work in Arizona.

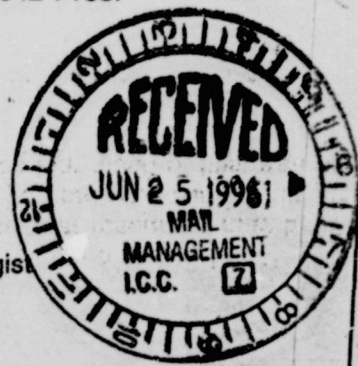
4. Once the survey(s) has been completed, a copy of the report(s) by the archaeologist should be sent to this office for review and comment prior to project implementation.

Your cooperation with this office in considering the impacts of federally licensed undertakings on historic preservation is greatly appreciated. If you have any questions, please feel free to contact me at 602/542-7138.

Sincerely,

Ann V. Howard

Ann Valdo Howard
Public Archaeology Programs Manager/Archaeologist
State Historic Preservation Office



Item No. _____
Page Count 3
Sum # 176

**ARIZONA SHPO ARCHAEOLOGICAL AND ETHNOGRAPHIC
CONSULTANTS LIST**

(Revised February 6, 1996)

**--THIS LIST IS NOT A COMPREHENSIVE LIST OF QUALIFIED
CONSULTANTS IN THE STATE OR AN OFFICIAL ENDORSEMENT
BY THE SHPO--**

CRITERIA FOR INCLUSION ON THIS LIST:

- 1) Firm or individual must be based in or have an office in Arizona.
Note: The SHPO does maintain a file on out-of-state firms that is available to the public upon request.
- 2) Firm or individual must meet the Secretary of Interior's Standards for professional qualifications.
- 3) Firm or individual must have successfully completed a project reviewed by the SHPO within the last 5 years.
- 4) Firm or individual must have submitted a written request to be on the list and documentation of professional qualifications to the SHPO.

Archaeological Consulting Services, Ltd., Attn: Margerie Green, Ph.D.
424 W. Broadway Road, Tempe, AZ 85282. Phone: (602) 894-5477.
Fax: (602) 894-5478.

Archaeological Research Services, Inc., Attn: Lyle M. Stone, Ph.D.
2124 S. Mill Avenue, Tempe, AZ 85282. Phone: (602) 966-3508.
Fax: (602) 303-0080.

Aztlan Archaeology, Inc., Attn: Laurie V. Slawson, Ph.D.
P.O. Box 44068, Tucson, AZ 85733-4068. Phone: (520) 620-1480.
Fax: (520) 620-1432.

Belagana Research Institute
P.O. Box 44068, Tucson, AZ 85733-4068. Phone: (520) 620-1480.
Fax: (520) 620-1432.

David S. Boloyan, Archaeologist/Ethnologist
1323 West Laird Street, Tempe, AZ 85281. Phone: (602) 858-9563.

Cultural & Environmental Systems, Inc., Attn: Mary Lou Heuett
P.O. Box 2324, Tucson, AZ 85702-2324. Phone: (520) 622-2782.
(Same as Phone #) Fax: (520) 622-2782.

Dames & Moore, Inc., Attn: J. Simon Bruder, Ph.D.
7500 N. Dreamy Draw Drive, Suite 145, Phoenix, AZ 85020. Phone: (602) 371-1110.
Fax: (602) 861-7431.

Desert Archaeology, Inc., Attn: William H. Doelle, Ph.D.
3975 N. Tucson Boulevard, Tucson, AZ 85716. Phone: (520) 881-2244.
Fax: (520) 881-0325.

Kinlani Archaeology Ltd, Cultural Resource Consultants, Attn: Deborah Dosh
2101 N. Fourth Street, Suite 220, Flagstaff, AZ 86004. Phone: (520) 556-9797.
Fax: (520) 556-9798.

Robert A. Larkin, M.S., M.A.
7776 Pointe Parkway West, Suite 290, Phoenix, AZ 85044. Phone: (602) 438-2200.
Fax: (602) 431-9562.

Northland Research, Inc.
(Flagstaff) P.O. Box 1401, Flagstaff, AZ 86002. Phone: (520) 774-5057.
Attn: William S. Marmaduke, Ph.D. Fax: (520) 774-3089.

(Tempe) 2308 S. Rural Road, Tempe, AZ 85282-2425. Phone: (602) 894-0020.
Attn: Ms. Johna Hutira Fax: (602) 894-0957.

P.A.S.T. - Professional Archaeological Services & Technologies
5036 Golder Ranch Road, Tucson, AZ 85739-9602. Phone: (520) 825-3536.
Fax: (520) 825-2636.

Pima Community College, Archaeology Centre, Attn: David V.M. Stephen, Director/Professor
2202 W. Anklam Road, Tucson, AZ 85709-0001. Phone: (520) 884-6022.

Plateau Mountain Desert Research, Attn: Donald E. Weaver, Jr.
P.O. Box 3463, Flagstaff, AZ 86003. Phone: (520) 779-3274.

Dr. Glen E. Rice, Head, OCRM/Department of Anthropology
Arizona State University, Box 872402, Tempe, AZ 85287-2402. Phone: (602) 965-7181.

Rincon Archaeology/SEC, Inc., Attn: Noel Logan, /Sarah Horton
(Rincon) - P.O. Box 85, Williams, AZ 86046. Phone: (520) 635-1441.

(SEC) - 20 Stutz Bearcat #6, Sedona, AZ 86336. Phone: (520) 282-7787.
Fax: (520) 282-0731.

Roadrunner Archaeology & Consulting, Attn: K. J. Schroeder
725 West 12th Street, Tempe, AZ 85281-5460. Phone: (602) 921-4055.

Scientific Archeological Services, Attn: James B. Rodgers, P.I.
2542 W. Monterey Way, Phoenix, AZ 85017-5104. Phone: (602) 257-8398.
(Same as Phone #) Fax: (602) 257-8398.

Soil Systems, Inc. (SSI), Attn: Cory Dale Breternitz, President
1121 North 2nd Street, Phoenix, AZ 85004. Phone: (602) 253-4938.
Fax: (602) 253-0107.

Statistical Research, Attn: Jeffrey H. Altschul, Ph.D.
2500 N. Pantano, Suite 218, P.O. Box 31865, Tucson, AZ 85751. Phone: (520) 721-4309.
Fax: (520) 298-7044.

(OVER)

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BOB MILLER
Governor

STATE OF NEVADA

JOHN P. COMEAUX
Director

ENVIRONMENTAL
MATERIALS

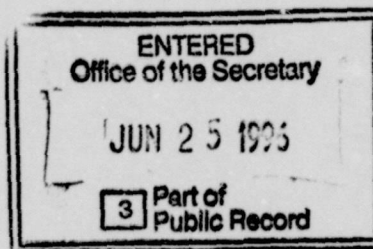


DEPARTMENT OF ADMINISTRATION

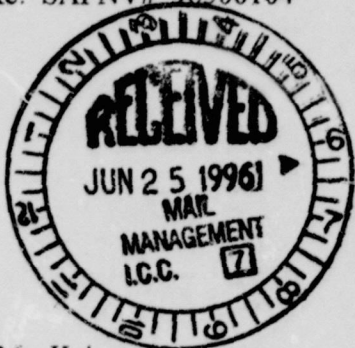
Capitol Complex
Carson City, Nevada 89710
Fax (702) 687-3983
(702) 687-4065

March 1, 1996

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation
12th and Constitution Avenue, Room 3219
Washington, DC 20423-0001



Re: SAI NV# 96300104



Project: ER -- Union Pacific Corporation, Union Pacific Railroad Company and Missouri Pacific Railroad Company Control and Merger Southern Pacific Rail Corporation, Southern Pacific Transportation Company, St. Louis Southwestern Railway Company, SPCSL Corp. and the Denver and Rio Grande Western Railroad Company (Finance Docket No32760)

Dear Ms. Kaiser:

Enclosed is an additional comment from the Nevada Department of Transportation that was received after our previous letter to you. Please incorporate this comment into your decision making process. If you have any questions, please contact either me, at 687-6382, or Julie Butler, Clearinghouse Coordinator/SPOC, at 687-6367.

Item No. _____
Page Count # 3
Jun 16 9

Sincerely,

Terri Rodefer, Environmental Advocate
Nevada State Clearinghouse

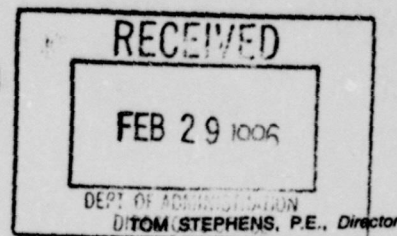
Enclosure



BOB MILLER, Governor

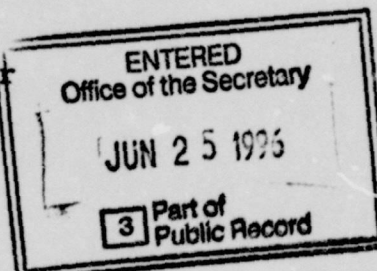
STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 S. Stewart Street
Carson City, Nevada 89712

February 27, 1996



In Reply Refer to:

Ms. Julie Butler, Coordinator
Nevada State Clearinghouse
Department of Administration
Budget Division
Blasdel Building, Room 204
Carson City, NV 89701



PSD 7.01

Dear Ms. Butler:

The Nevada Department of Transportation has reviewed the project titled ER--Union Pacific Corporation, Union Pacific Railroad Company and Missouri Pacific Railroad Company Control and Merger Southern Pacific Rail Corporation, Southern Pacific Transportation Company, St. Louis Southwestern Railway Company, SPCSL Corp. and the Denver and Rio Grade Western Railroad Company SAI#96300104-2.

Based on the information submitted, we have the following comments on the proposed project.

1. Rail Line Segment: The increased traffic volumes will require re-analyzing the Statewide Hazard Index based on the projected traffic counts on each line segment. This could either raise or lower individual projects and affect our short range project list. The local entities would be affected also for off system crossing improvements in their budgeting process.
2. Rail Yards: The closure of the Carlin yard would require the signals (flashing lights) to be relocated to their proper position in relation to the remaining tracks. Removal of tracks through the crossing will require PSC approval. Any released material may have salvage value credited to the State, or be transported and stored for future use. Assignable costs would have to be determined.
3. Intermodal: The Parr TOFC facility was improved with an FRA grant and certain payback procedures will come into effect if the yard is closed. Rail traffic changes would affect the entire Reno Branchline and future safety

Julie Butler
February 27, 1996
Page 2

projects that are planned. The Safety Engineering Division has requested clarification in this matter from UPRR but has not yet received a reply. If the TOFC yard remains in service and it served from the southern end (off the SP), major traffic disruptions can be expected on the local streets and the existing crossings will have to be upgraded at a cost of \$500,000+.

4. & 5. The abandonments in other States would probably have no affect on our plans unless traffic is diverted through Nevada, then the HAZ-Index would be affected and project schedules rearranged.

We have formally intervened in the pending merger application between the UP and SP and will be providing comments as appropriate throughout the merger proceedings. The merger is being deliberated by the surface Transportation Board which replaced the Interstate Commerce Commission.

Thank you for the opportunity to review this project.

Sincerely,

Thomas J. Fronapfel

Thomas J. Fronapfel, P.E.
Assistant Director - Planning

TJF:PAF:dg

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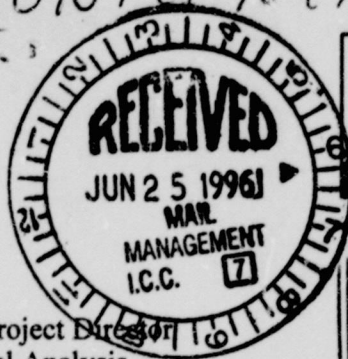
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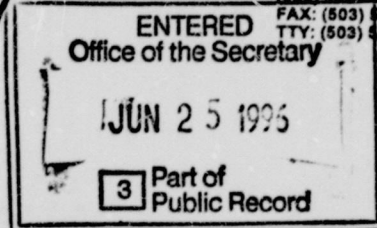
February 23, 1996

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington D.C. 20431-0001



**CITY
OF SALEM,
OREGON**
City Hall/555 Liberty Street SE
Zip Code 97301-3503

Public Works Department
FAX: (503) 588-8025
TTY: (503) 588-6292



Item No. 84413
Page Count 2
JUN 25 1996

SUBJECT: SURFACE TRANSPORTATION BOARD REQUEST FOR ENVIRONMENTAL COMMENTS ON THE POTENTIAL ENVIRONMENTAL IMPACTS OF THE CONTROL AND MERGER APPLICATION BETWEEN THE UNION PACIFIC AND SOUTHERN PACIFIC RAILROADS (Finance Docket No. 32760)

Dear Ms. Kaiser:

This letter is in response to your request for comments on the above-referenced subject. The City of Salem was not directly notified of the request for comments. We obtained a copy of your January 29, 1996, letter to the Hon. Mary Pearmine, Chair, Board of Marion County Commissioners, through our regional inter-governmental notification process. Unfortunately, we received the copy after the comment deadline had passed. The potential impacts to the safety, traffic flow, ambient air quality, and overall quality of life of our citizens due to the proposed merger of the Union Pacific and Southern Pacific Railroads is of critical importance to us. Thus, while we realize that our comments are being provided to you after the close date, we hope that they will be given due consideration.

In your letter, you request comments on the potential impacts of the merger on a number of impact areas that pertain to our jurisdiction. The following comments are organized under the categories you suggested.

Existing local, regional, and national transportation systems The Oregon-specific information attached to your letter indicates that an increase in train traffic is probable within our area. The City of Salem currently has 15 at-grade railroad crossings, the majority of which are located on the eastern fringe of the central business district.¹ Increased train traffic along the SP line will certainly impact our citizen's ability to travel into and out the CBD. All of the at-grade crossings are locally-maintained roadway facilities.

Local land use, including parks and refuges The southern portion of the SP line through Salem generally traverses land that is agriculture, ex-urban, or industrial in nature. The central and northern portions of the line however, is directly adjacent to a number of commercial, institutional, and historic areas. These include: Willamette University, Tokyo International University of America, State of Oregon Supreme Court, Mission Mill Historic District, North Salem High School and

¹Salem's central business district is made up of a downtown core area, state capitol and associated office buildings, and Willamette University. It is generally bounded by the Southern Pacific Railroad Line on the east, Willamette River on the west, State Road 22/Business 99E on the south, and Marion Street on the north.

Elaine K. Kaiser
February 23, 1996
Page 2

Parrish Middle School, and Barrick Field (park). The line also bisects three vital residential areas consisting of Southeast Salem (SESNA), Northeast Neighbors (NEN), and Northgate Neighborhood Associations.

Air emissions and ambient air quality conditions The Salem metropolitan area (Salem/Keizer) is designated as a non-attainment area for both carbon monoxide (CO) and ozone (O₃). Potential impacts to the area's air quality due to automobile delays at the at-grade crossings is of concern to not only the City of Salem, but the participating governments of the Salem/Keizer Transportation Study (the locally-designated MPO). As you may know, air quality non-attainment may lead to the curtailment of federal funding of roadway projects for the region.

Noise Given the new rules pertaining to train whistle and horn blowing required by the Swift Rail Development Act of 1994, increased train traffic will result in a decline of quality of life for the residents who live adjacent to the SP line, and will impact the other land uses that abut it.

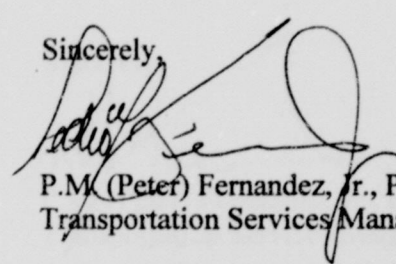
Public Health and Safety, including hazardous materials The City of Salem's public health and safety concerns are two-fold. First is safety at the railroad crossings. The City of Salem has experienced four pedestrian accidents at railroad crossings over the past twelve months. Given the SP line's location, motorists and pedestrians are equally at risk. Second is train derailments. A number of derailments have be felled the SP line in Salem recently. The hazard of the derailment itself, combined with the potential for hazardous materials spills is of great concern to us.

Historic, cultural, or archeological resources As previously noted in this letter, the SP line is directly adjacent to a number of historic and cultural land uses.

Thank you for the opportunity to provide you with our comments. Please include the City of Salem in future mailings on this issue. The City's contact is:

Peter Fernandez, P.E.
Transportation Services Manager
City of Salem Public Works Department
555 Liberty Street SE, Room 325
Salem, OR 97301-3503

Sincerely,



P.M. (Peter) Fernandez, Jr., P.E.
Transportation Services Manager

:\PERSONAL\POSTIER\CORR96\KAISER.223

Attachment:

cc: Richard Schmid, Mid-Willamette Valley Council of Governments
Bob Hansen, Marion County Public Works Director
John Morgan, City of Keizer
Frank Mauldin, Public Works Director

STB

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6-25-96

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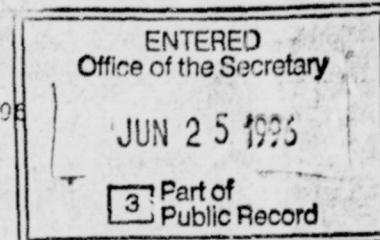
Kiowa County Commissioners

Commissioners
J.D. Wilson
Sheridan Lake, Colorado
Nutch Elkenberg
Haswell, Colorado
Cardon Berry
Eads, Colorado

1305 GOFF
P.O. BOX 591
EADS, COLORADO 81036
(719) 438-5810
(719) 438-5615
FAX (719) 438-5327

Commissioners Meet
Twice Monthly

February 14, 1996



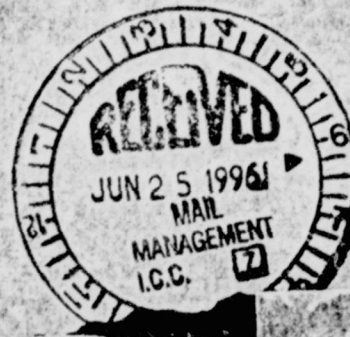
Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th & Constitution Avenue, Room 3219
Washington, D.C. 20423-0001

RE: Finance Docket No. 32760 - Comments
Potential Environmental Impacts

Dear Ms. Kaiser,

Pursuant to your letter dated January 29, 1996, we would like to voice our concerns of the potential Environmental Impacts in regards to the potential UP/SP Merger and abandonments. We would like to address the following:

1.) Existing Local & Regional Transportation Systems - Our constituents the Kiowa County farmers along with neighboring county farmers annually produce well over 5 million bushels of grain with a potential production of 9 million bushels in the upcoming years in the event the Conservation Reserve Program (CRP) is not extended thus releasing current grasslands back into producing farmground. We feel that this increase of production along with the railroad abandonment will greatly impact our highways which are already significantly deteriorated. Also, if abandonment is awarded and land is reverted back to original state, the Colorado Department of Transportation may be required to install bridges where needed at Colorado's expense. We would respectfully request that UP be required to compensate CDOT for these unanticipated bridge costs.



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Page Count 3
JUN 16 1996



2.) **Local Land Use** - Enclosed are photographs of dirt dikes which the railroad built. We request that with the adjoining landowner's express consent that these dikes and track bed be leveled, cleaned and reclaimed to their original state. This is to include the leveling, fertilizing and seeding to a well-established native grass. Please note that fencing of these lands will be required. We feel that this should not be up to Colorado Government to provide and we further would request that UP be ordered to provide sufficient funds if the abandonment is awarded. Whenever the railroad was established fencing was a requirement.

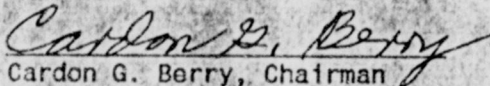
3.) **Public Health & Safety** - If the abandonment is awarded and the land is reverted back to the landowner, we request that UP run soil tests at each derailment site over the past 20 years. These tests should include but not be limited to meet all EPA standards for hazardous materials. Also, a mailing of these results should be provided to the local Board of Health.

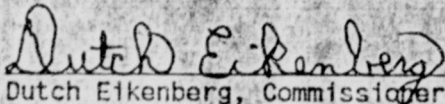
4.) **Water Resources (Wetlands)** - Inasmuch as we have three (3) major creeks that are part of the Arkansas River drainage system, we have great concerns for our creek systems.

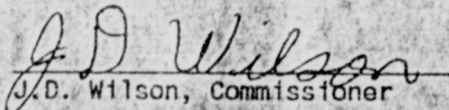
We sincerely appreciate the opportunity for allowing Kiowa County to voice to its concerns on the above-mentioned matter. If we can be of more assistance, please do not hesitate to contact us.

Sincerely,

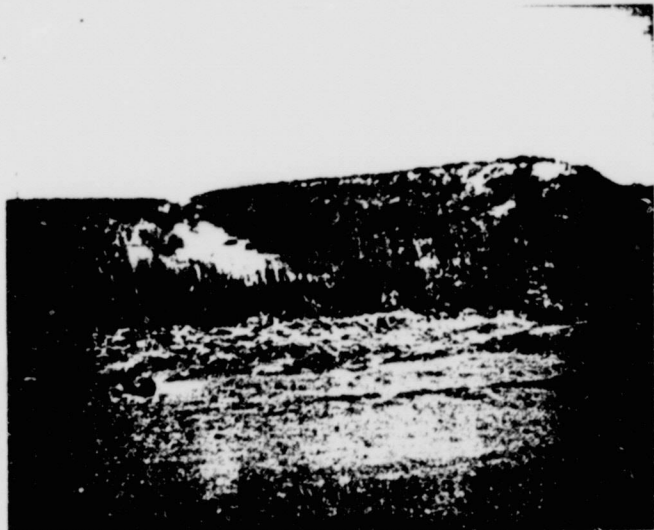
Kiowa County Commissioners


Cardon G. Berry, Chairman


Dutch Eikenberg, Commissioner


J.D. Wilson, Commissioner

PHOTOS ATTACHED TO
KIOWA County Commissioners (CC)
response to SEA dtd 2/15/96



STB

FD

32760

6-25-96

K

84410

84410

NEVADA COUNTY
TRANSPORTATION COMMISSION

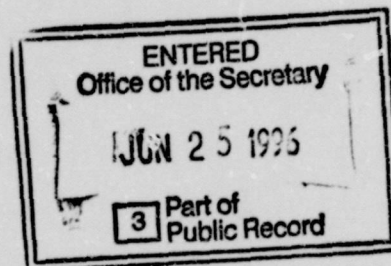
Mass Valley • Nevada City

Nevada County • Truckee

February 29, 1996

Files: 1200.7
1450.0

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 29423-0001



Attention: Finance Docket No. 32760 - Comments

Dear Ms. Kaiser:

ENVIRONMENTAL
MATERIALS

This letter is written on behalf of the Nevada County Transportation Commission regarding the environmental impacts of the proposed Union Pacific and Southern Pacific railroad merger.

The Nevada County Transportation Commission is the regional transportation planning agency for Nevada County, California. In preparing the environmental assessment for the proposed merger, we hope you will consider the substantial impact increased train traffic will have on the Town of Truckee at the crossing of State Highway 267 and the railroad. Currently, there are 8-12 trains per day through Truckee. Each time a train moves through the town, auto traffic comes to gridlock near the railroad crossing. During peak times, traffic queues extend from the train tracks one to two miles south into the Martis Valley. Emergency vehicles are frequently blocked from exiting the nearby fire station. Also, increased rural traffic combined with the natural increase in vehicular traffic will compound the potential for rail/vehicle accidents at this grade crossing.

If you need further information from this office, you may contact me at (916) 265-3202. Thank you for your assistance in ensuring that these concerns are addressed in the environmental documentation.

Sincerely,

Daniel B. Landon
Daniel B. Landon
Executive Director

DBL:nh

cc: Julie Donsky, Environmental Scientist
Dames and Moore



Item No. _____
Page Count 3
Jun 27 1996

**NEVADA COUNTY
TRANSPORTATION COMMISSION**

Grass Valley • Nevada City

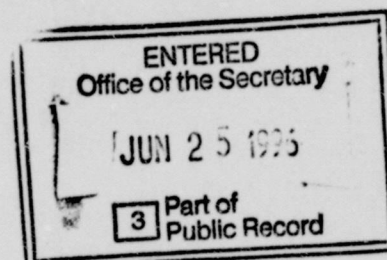
Nevada County • Truckee

February 29, 1996

Files: 1200.7

1450

Elaine K. Kaiser
UP/SP Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
12th and Constitution Avenue, Room 3219
Washington, D.C. 29423-0001

**Attention: Finance Docket No. 32760 - Comments**

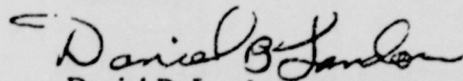
Dear Ms. Kaiser:

This letter is written on behalf of the Nevada County Transportation Commission regarding the environmental impacts of the proposed Union Pacific and Southern Pacific railroad merger.

The Nevada County Transportation Commission is the regional transportation planning agency for Nevada County, California. In preparing the environmental assessment for the proposed merger, we hope you will consider the substantial impact increased train traffic will have on the Town of Truckee at the crossing of State Highway 267 and the railroad. Currently, there are 8-12 trains per day through Truckee. Each time a train moves through the town, auto traffic comes to gridlock near the railroad crossing. During peak times, traffic queues extend from the train tracks one to two miles south into the Martis Valley. Emergency vehicles are frequently blocked from exiting the nearby fire station. Also, increased rural traffic combined with the natural increase in vehicular traffic will compound the potential for rail/vehicle accidents at this grade crossing.

If you need further information from this office, you may contact me at (916) 265-3202. Thank you for your assistance in ensuring that these concerns are addressed in the environmental documentation.

Sincerely,


Daniel B. Landon
Executive Director

DBL:nh

cc: Julie Donsky, Environmental Scientist
Dames and Moore

**NEVADA COUNTY
TRANSPORTATION COMMISSION**

Valley • Nevada City

Nevada County • Truckee

FAX TRANSMISSION COVER SHEET

DATE: February 29, 1996

TO: Elaine K. Kaiser

COMPANY: UP/SP Environmental Project Director

FROM: Daniel B. Landon

NUMBER OF PAGES BEING TRANSMITTED 2 **(INCLUDES COVER SHEET)**

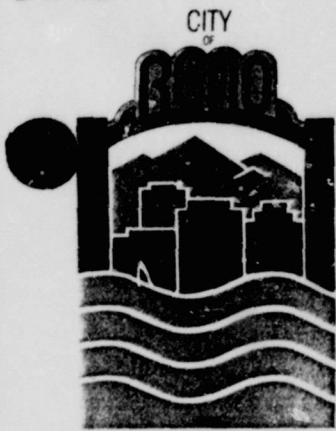
CONTENTS: Finance Docket No. 32760-Comments

RETURN FAX NUMBER: (916) 265-3280

STB FD 32760

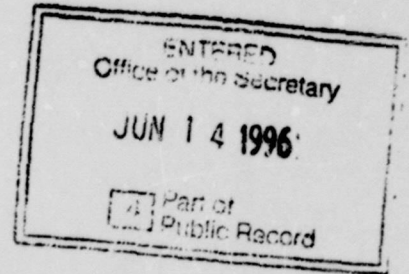
6-11-96

84243



P.O. Box 1900
Reno, Nevada 89505

June 3, 1996



Elaine Kaiser
Chief of Environmental Analysis
Surface Transportation Board
1201 Constitution Ave., N.W.
Room 3210
Washington, D.C., 20423



Item No. _____

Dear Ms. Kaiser,

Page Count 1

JUNE 1996 # 130

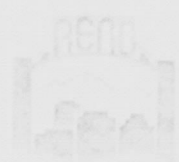
I want to thank you and the other members of the Environmental Analysis Section of the Surface Transportation Board for making the visit to Reno. It was very important to the City of Reno that your group see first-hand the negative safety and environmental impacts the proposed railroad merger will have on the City of Reno.

The only way to truly get a perspective on the problem is to stand by the tracks at one end of downtown and look down them to see how the grade crossings literally cut off the traffic between the north and south part of town.

I am hopeful that you will take a strong stand in support of our plan to mitigate the negative impact of the railroad merger by moving the tracks to the I-80 corridor. The City is working very hard to come up with a win/win situation for the City and Union Pacific and Southern Pacific railroad in the event that the merger is approved.

Sincerely yours,

Charles E. McNeely
Charles E. McNeely
City Manager



RENO
NATIONAL PARK
CALIFORNIA
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

STB

FD

• 32760

6-8-96

K

• ✓ 84171

Item No. 85-337

Page Count 2

44-1996 # 11

LAW OFFICES
McCARTHY, SWEENEY & HARKAWAY, P. C.
1750 PENNSYLVANIA AVE., N. W.
WASHINGTON, D. C. 20006
TELEPHONE (202) 393-5710
TELECOPIER (202) 393-5721

ANDREW P. GOLDSTEIN
Counsel

DOUGLAS M. CANTER
JOHN M. CUTLER, JR.
WILLIAM I. HARKAWAY
STEVEN J. KALISH
KATHLEEN L. MAZURE
HARVEY L. REITER
DANIEL J. SWEENEY

August 20, 1996

ENVIRONMENTAL
DOCUMENT



Ms. Elaine K. Kaiser
Chief
Mr. Michael Dalton
Team Leader
Office of Economic and Environmental Analysis
Surface Transportation Board
Washington, D.C. 20423

Re: Finance Docket No. 32760, Union Pacific
Corporation, et al. -- Control and Merger --
Southern Pacific Rail Corporation, et al.

Dear Ms. Kaiser and Mr. Dalton:

Wichita and Sedgwick County look forward to working cooperatively and productively with you and the other members of your team in the preparation of the studies mandated by Decision No. 44. Toward that end, we have three initial requests.

First, in order to avoid any misunderstandings on our part as to the scope of the consultant's services, we would appreciate it if you could provide us the current working version of the scope of services document.

Second, in order to start us all off on the right foot, we suggest that a meeting be scheduled between the consultant and appropriate Wichita and Sedgwick County officials at the earliest possible date. That meeting will allow interested persons to be introduced to each other and to develop early working relationships between specialists in various fields.

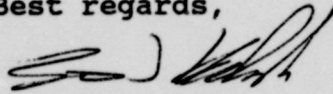
Third, Wichita and Sedgwick County have designated Willard L. ("Bill") Stockwell, Chief Planner, Wichita-Sedgwick County Metropolitan Area Planning Department, as their coordinator for working with the Board's consultant. It is our hope that, in order to avoid confusion and in order to ensure the most prompt possible responses to informational requests of the consultant, all requests for meetings and/or information be addressed to Mr. Stockwell. He may be reached at City Hall -- Tenth Floor, 455 North Main Street, Wichita, Kansas 67202-1688, phone (316) 268-4421, fax (316) 268-4390. Of course, we would appreciate it if I

ENTERED	
Office of the Secretary	
AUG 23 1996	
5	Part of Public Record

- 2 -

could be copied on all correspondence as attorney for the City and County.

Best regards,

A handwritten signature in dark ink, appearing to read "S. J. Kalish", written in a cursive style.

Steven J. Kalish

STB

FD

32760

6-6-95

K

84265

84265

6/6/96 11:18:57 AM

Arkansas

THE NATURAL STATE

ENVIRONMENTAL DOCUMENT

March 15, 1996

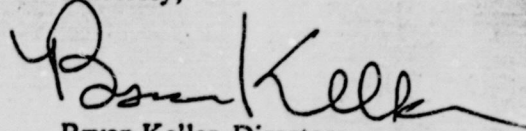
Ms. Julie Donsky, Environmental Scientist
Dames and Moore
One Continental Towers
1701 Golf Road, Suite 1000
Rolling Meadows, Illinois 60008

Dear Ms. Donsky:

Enclosed is the information your requested for the addendum to the Environmental Report for the application for merger of the Union Pacific and Southern Pacific Railroads.

Attached is an inventory of all parks in that area.

Sincerely,



Bryan Kellar, Director
Outdoor Park Recreation Grants

BK:wb

Enclosure

Item No. _____

Page Count 21

Jim 103



DEPARTMENT OF PARKS & TOURISM

One Capitol Mall
Little Rock, AR 72201
Phone: 501-682-7777
FAX: 501-682-1364

History Commission:
501-682-6900 (V/TT)

Personnel Section:
501-682-7742 (V/TT)

State Parks Division:
501-682-1191 (V/TT)

Tourism Division:
501-682-7777 (V/TT)

Internet Addresses:
<http://www.ark.com/arkansas>
<http://www.state.ar.us>
74143.456@compuserve.com

Jim Guy Tucker
GOVERNOR

Richard W. Davies
EXECUTIVE DIRECTOR

STATE PARKS, RECREATION & TRAVEL COMMISSION:

Anna Kay Mottelson
CHAIRMAN

Danny Ford
VICE-CHAIRMAN

Jane Christensen

Steve Chyrchal

Ed Fohwell

Jim Gaston

Billy Lindsey

Montine McNulty

Dean Murphy

Billy St. James

Nease Sechrist

J.D. "Bud" Shamburger

Ovid Switzer

Charles Yeargan

DIVISION DIRECTORS:

Larry Cargile
ADMINISTRATION

Greg Bufts
STATE PARKS

Joe David Rice
TOURISM

Nancy Clark
GREAT RIVER ROAD

John L. Ferguson
HISTORY COMMISSION

Anita Middleton
KEEP ARKANSAS
BEAUTIFUL

AN EQUAL
OPPORTUNITY/
AFFIRMATIVE ACTION/
AMERICANS WITH
DISABILITIES ACT
EMPLOYER

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK\REC SITE Hicks Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION\ADDRESS South 25th Street

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Parks and Recreation

LAST INV. DATE 7/93.

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres) _____ 1/

Recreational Water Area (acres) _____ 0

PLAYING FIELDS

Baseball/softball fields - unlighted (number) _____ 0

Baseball/softball fields - lighted (number) _____ 1

Open Play Fields (number) _____ 1

Soccer Fields (number) _____ 0

COURTS

Tennis Courts - Unlighted (number) _____ 1

Tennis Courts - Lighted (number) _____ 0

Basketball Gor' - Unlighted (number) _____ 6

Basketball Goals - Lighted (number) _____ 4

GOLF

Golf Course (number of holes) _____ 0

Miniature Golf/Putt-Putt Courses (number) _____ 0

Golf Driving Ranges (number) _____ 0

SWIMMING

Swimming (number of pools) _____ 0

Swimming (total sq. ft. area of pools) _____ 0

Non-Pool Swimming Areas (number) _____ 0

PLAYGROUNDS

Equipped Playgrounds (number) _____ 1

Equipped Tot Lots (number) _____ 1

TRAILS

Hiking/Nature Trails (number) _____ 0

Hiking/Nature Trails (miles) _____ 0

Hiking/Nature Trails (names) _____

Running/Jogging Trails (number) _____ 0

Running/Jogging Trails (miles) _____ 0

Running/Jogging Trails (names) _____

Exercise Trails/Fitness Course (number) _____ 0

Is there a Running Track at the Site? _____ No

TRAILS (cont'd)

Bicycle Trails (number) _____

Bicycle Trails (miles) _____

Bicycle Trails (names) _____

RV Trails (number) _____

RV Trails (miles) _____

RV Trails (names) _____

Horse Trails (number) _____

Horse Trails (names) _____

Horse Trails (miles) _____

WATER ACCESS

Fishing (surface acres of water) _____

Fishing Piers or Docks (total number) _____

Are there Handicap. Access. Piers/Docks at the Site? _____

Boating (number of launching ramps) _____

Marina (number of slips or stalls) _____

CAMPING

Camping - RV/Trailer Sites (number) _____

Camping - Tent Sites (number) _____

Camping - Cabins/Shelters (number) _____

Camping - Primitive (acres) _____

PICNIC FACILITIES

Picnic Tables (number) _____

Picnic Shelters/Pavilions (number) _____

Are there Handicap. Access. Picnic Facilities at the Site? _____

RANGES

Rifle/Pistol Ranges (number of positions) _____

Skeet/Trap Ranges (number of positions) _____

Archery Ranges (number of positions) _____

OTHER FACILITIES

Is there a Rodeo Arena at the Site? _____

Amphitheater (number) _____

Arboretum (number) _____

Vehicle Parking (number of spaces) _____

Are Handicap. Parking Spaces Available? _____

Are Restroom Facilities Available at the Site? _____

Are the Restroom Facilities Handicap Accessible? _____

Are there Water Fountains Located at this Site? _____

Concession Stands/Snack Bars _____

Is there a Community/Recreation Center on the Site? _____

Comments? _____

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK\REC SITE Grimsley Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION\ADDRESS North Balfour Road

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Park and Recreation

LAST INV. DATE 7/93.

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres) _____

6.5

Recreational Water Area (acres) _____

0

PLAYING FIELDS

Baseball/softball fields - unlighted (number) _____

1

Baseball/softball fields - lighted (number) _____

0

Open Play Fields (number) _____

1

Soccer Fields (number) _____

1

COURTS

Tennis Courts - Unlighted (number) _____

1

Tennis Courts - Lighted (number) _____

0

Basketball Goals - Unlighted (number) _____

2

Basketball Goals - Lighted (number) _____

0

GOLF

Golf Course (number of holes) _____

0

Miniature Golf/Putt-Putt Courses (number) _____

0

Golf Driving Ranges (number) _____

0

SWIMMING

Swimming (number of pools) _____

0

Swimming (total sq. ft. area of pools) _____

0

Non-Pool Swimming Areas (number) _____

0

PLAYGROUNDS

Equipped Playgrounds (number) _____

1

Equipped Tot Lots (number) _____

1

TRAILS

Hiking/Nature Trails (number) _____

0

Hiking/Nature Trails (miles) _____

0

Hiking/Nature Trails (names) _____

Running/Jogging Trails (number) _____

0

Running/Jogging Trails (miles) _____

0

Running/Jogging Trails (names) _____

Exercise Trails/Fitness Course (number) _____

0

Is there a Running Track at the Site? _____

No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	0
Fishing Piers or Docks (total number)	_____	0
Are there Handicap. Access. Piers/Docks at the Site?	_____	No
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	8
Picnic Shelters/Pavilions (number)	_____	1
Are there Handicap. Access. Picnic Facilities at the Site?	_____	Yes

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	0
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	25
Are Handicap. Parking Spaces Available?	_____	Yes
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	No
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	0
Is there a Community/Recreation Center on the Site?	_____	No
Comments?		

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK\REC SITE 10th Street Mini-Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION\ADDRESS Located at 10th and Jackson

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Parks and Recreation

LAST INV. DATE 7/93,

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres) _____ 0.12

Recreational Water Area (acres) _____ 0

PLAYING FIELDS

Baseball/softball fields - unlighted (number) _____ 0

Baseball/softball fields - lighted (number) _____ 0

Open Play Fields (number) _____ 0

Soccer Fields (number) _____ 0

COURTS

Tennis Courts - Unlighted (number) _____ 0

Tennis Courts - Lighted (number) _____ 0

Basketball Goals - Unlighted (number) _____ 0

Basketball Goals - Lighted (number) _____ 2

GOLF

Golf Course (number of holes) _____ 0

Miniature Golf/Putt-Putt Courses (number) _____ 0

Golf Driving Ranges (number) _____ 0

SWIMMING

Swimming (number of pools) _____ 0

Swimming (total sq. ft. area of pools) _____ 0

Non-Pool Swimming Areas (number) _____ 0

PLAYGROUNDS

Equipped Playgrounds (number) _____ 0

Equipped Tot Lots (number) _____ 0

TRAILS

Hiking/Nature Trails (number) _____ 0

Hiking/Nature Trails (miles) _____ 0

Hiking/Nature Trails (names) _____

Running/Jogging Trails (number) _____ 0

Running/Jogging Trails (miles) _____ 0

Running/Jogging Trails (names) _____

Exercise Trails/Fitness Course (number) _____ 0

Is there a Running Track at the Site? _____ No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	0
Fishing Piers or Docks (total number)	_____	0
Are there Handicap. Access. Piers/Docks at the Site?	_____	No
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	0
Picnic Shelters/Pavilions (number)	_____	0
Are there Handicap. Access. Picnic Facilities at the Site?	_____	No

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	0
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	0
Are Handicap. Parking Spaces Available?	_____	No
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	Yes
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	0
Is there a Community/Recreation Center on the Site?	_____	No
Comments?		

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK/REC SITE Willie Mae Rowe Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION/ADDRESS N. 11th Street

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Park and Recreation

LAST INV. DATE 7/93,

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres) _____

0.3

Recreational Water Area (acres) _____

0

PLAYING FIELDS

Baseball/softball fields - unlighted (number) _____

0

Baseball/softball fields - lighted (number) _____

0

Open Play Fields (number) _____

0

Soccer Fields (number) _____

0

COURTS

Tennis Courts - Unlighted (number) _____

0

Tennis Courts - Lighted (number) _____

0

Basketball Goals - Unlighted (number) _____

0

Basketball Goals - Lighted (number) _____

4

GOLF

Golf Course (number of holes) _____

0

Miniature Golf/Putt-Putt Courses (number) _____

0

Golf Driving Ranges (number) _____

0

SWIMMING

Swimming (number of pools) _____

0

Swimming (total sq. ft. area of pools) _____

0

Non-Pool Swimming Areas (number) _____

0

PLAYGROUNDS

Equipped Playgrounds (number) _____

1

Equipped Tot Lots (number) _____

0

TRAILS

Hiking/Nature Trails (number) _____

0

Hiking/Nature Trails (miles) _____

0

Hiking/Nature Trails (names) _____

Running/Jogging Trails (number) _____

0

Running/Jogging Trails (miles) _____

0

Running/Jogging Trails (names) _____

Exercise Trails/Fitness Course (number) _____

0

Is there a Running Track at the Site? _____

No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	0
Fishing Piers or Docks (total number)	_____	0
Are there Handicap. Access. Piers/Docks at the Site?	_____	No
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	4
Picnic Shelters/Pavilions (number)	_____	1
Are there Handicap. Access. Picnic Facilities at the Site?	_____	Yes

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	0
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	5
Are Handicap. Parking Spaces Available?	_____	Yes
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	Yes
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	0
Is there a Community/Recreation Center on the Site?	_____	No
Comments?		

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK\REC SITE Horton Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION\ADDRESS East Barton Road

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney

LAST INV. DATE 7/93,

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres)	0.3
Recreational Water Area (acres)	0

PLAYING FIELDS

Baseball/softball fields - unlighted (number)	0
Baseball/softball fields - lighted (number)	0
Open Play Fields (number)	1
Soccer Fields (number)	0

COURTS

Tennis Courts - Unlighted (number)	0
Tennis Courts - Lighted (number)	2
Basketball Goals - Unlighted (number)	0
Basketball Goals - Lighted (number)	1

GOLF

Golf Course (number of holes)	0
Miniature Golf/Putt-Putt Courses (number)	0
Golf Driving Ranges (number)	0

SWIMMING

Swimming (number of pools)	0
Swimming (total sq. ft. area of pools)	0
Non-Pool Swimming Areas (number)	0

PLAYGROUNDS

Equipped Playgrounds (number)	0
Equipped Tot Lots (number)	0

TRAILS

Hiking/Nature Trails (number)	0
Hiking/Nature Trails (miles)	0
Hiking/Nature Trails (names)	

Running/Jogging Trails (number)	0
Running/Jogging Trails (miles)	0
Running/Jogging Trails (names)	

Exercise Trails/Fitness Course (number)	0
Is there a Running Track at the Site?	No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	0
Fishing Piers or Docks (total number)	_____	0
Are there Handicap. Access. Piers/Docks at the Site?	_____	No
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	6
Picnic Shelters/Pavillions (number)	_____	1
Are there Handicap. Access. Picnic Facilities at the Site?	_____	Yes

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	0
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	1
Are Handicap. Parking Spaces Available?	_____	Yes
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	Yes
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	1
Is there a Community/Recreation Center on the Site?	_____	No
Comments?	_____	

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?
 NAME OF PARK/REC SITE Matthews Park
 CLOSEST MAJOR HIGHWAY

SITE LOCATION\ADDRESS S. Vanderbilt Street

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Parks Director

LAST INV. DATE 7/93.

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres)	_____	1.14
Recreational Water Area (acres)	_____	0

PLAYING FIELDS

Baseball/softball fields - unlighted (number)	_____	0
Baseball/softball fields - lighted (number)	_____	1
Open Play Fields (number)	_____	1
Soccer Fields (number)	_____	0

COURTS

Tennis Courts - Unlighted (number)	_____	0
Tennis Courts - Lighted (number)	_____	1
Basketball Goals - Unlighted (number)	_____	0
Basketball Goals - Lighted (number)	_____	0

GOLF

Golf Course (number of holes)	_____	0
Miniature Golf/Putt-Putt Courses (number)	_____	0
Golf Driving Ranges (number)	_____	0

SWIMMING

Swimming (number of pools)	_____	0
Swimming (total sq. ft. area of pools)	_____	0
Non-Pool Swimming Areas (number)	_____	0

PLAYGROUNDS

Equipped Playgrounds (number)	_____	1
Equipped Tot Lots (number)	_____	1

TRAILS

Hiking/Nature Trails (number)	_____	0
Hiking/Nature Trails (miles)	_____	0
Hiking/Nature Trails (names)	_____	

Running/Jogging Trails (number)	_____	0
Running/Jogging Trails (miles)	_____	0
Running/Jogging Trails (names)	_____	

Exercise Trails/Fitness Course (number)	_____	0
Is there a Running Track at the Site?	_____	No

TRAILS (cont'd)

Bicycle Trails (number) _____	0
Bicycle Trails (miles) _____	0
Bicycle Trails (names) _____	
ORV Trails (number) _____	0
ORV Trails (miles) _____	0
ORV Trails (names) _____	
Horse Trails (number) _____	0
Horse Trails (names) _____	
Horse Trails (miles) _____	0

WATER ACCESS

Fishing (surface acres of water) _____	0
Fishing Piers or Docks (total number) _____	0
Are there Handicap. Access. Piers/Docks at the Site? _____	No
Boating (number of launching ramps) _____	0
Marina (number of slips or stalls) _____	0

CAMPING

Camping - RV/Trailer Sites (number) _____	0
Camping - Tent Sites (number) _____	0
Camping - Cabins/Shelters (number) _____	0
Camping - Primitive (acres) _____	0

PICNIC FACILITIES

Picnic Tables (number) _____	14
Picnic Shelters/Pavilions (number) _____	2
Are there Handicap. Access. Picnic Facilities at the Site? _____	Yes

RANGES

Rifle/Pistol Ranges (number of positions) _____	0
Skeet/Trap Ranges (number of positions) _____	0
Archery Ranges (number of positions) _____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site? _____	No
Amphitheater (number) _____	0
Arboretum (number) _____	0
Vehicle Parking (number of spaces) _____	0
Are Handicap. Parking Spaces Available? _____	No
Are Restroom Facilities Available at the Site? _____	Yes
Are the Restroom Facilities Handicap Accessible? _____	No
Are there Water Fountains Located at this Site? _____	Yes
Concession Stands/Snack Bars _____	1
Is there a Community/Recreation Center on the Site? _____	No
Comments? _____	

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK\REC SITE Franklin Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION ADDRESS North Avalon Avenue

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Parks and Recreation

LAST INV. DATE 7/93.

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres)	_____	0.92
Recreational Water Area (acres)	_____	0

PLAYING FIELDS

Baseball/softball fields - unlighted (number)	_____	0
Baseball/softball fields - lighted (number)	_____	0
Open Play Fields (number)	_____	1
Soccer Fields (number)	_____	0

COURTS

Tennis Courts - Unlighted (number)	_____	0
Tennis Courts - Lighted (number)	_____	0
Basketball Goals - Unlighted (number)	_____	0
Basketball Goals - Lighted (number)	_____	1

GOLF

Golf Course (number of holes)	_____	0
Miniature Golf/Putt-Putt Courses (number)	_____	0
Golf Driving Ranges (number)	_____	0

SWIMMING

Swimming (number of pools)	_____	0
Swimming (total sq. ft. area of pools)	_____	0
Non-Pool Swimming Areas (number)	_____	0

PLAYGROUNDS

Equipped Playgrounds (number)	_____	1
Equipped Tot Lots (number)	_____	1

TRAILS

Hiking/Nature Trails (number)	_____	0
Hiking/Nature Trails (miles)	_____	0
Hiking/Nature Trails (names)	_____	

Running/Jogging Trails (number)	_____	0
Running/Jogging Trails (miles)	_____	0
Running/Jogging Trails (names)	_____	

Exercise Trails/Fitness Course (number)	_____	0
Is there a Running Track at the Site?	_____	No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	0
Fishing Piers or Docks (total number)	_____	0
Are there Handicap. Access. Piers/Docks at the Site?	_____	No
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	4
Picnic Shelters/Pavilions (number)	_____	0
Are there Handicap. Access. Picnic Facilities at the Site?	_____	Yes

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	0
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	0
Are Handicap. Parking Spaces Available?	_____	Yes
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	Yes
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	0
Is there a Community/Recreation Center on the Site?	_____	No
Comments?	_____	

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK\REC SITE Hightower Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION\ADDRESS Located at Broadway and 14th Street

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney

LAST INV. DATE 7/93.

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres) _____ 0.34

Recreational Water Area (acres) _____ 0

PLAYING FIELDS

Baseball/softball fields - unlighted (number) _____ 0

Baseball/softball fields - lighted (number) _____ 0

Open Play Fields (number) _____ 1

Soccer Fields (number) _____ 0

COURTS

Tennis Courts - Unlighted (number) _____ 0

Tennis Courts - Lighted (number) _____ 0

Basketball Goals - Unlighted (number) _____ 2

Basketball Goals - Lighted (number) _____ 0

GOLF

Golf Course (number of holes) _____ 0

Miniature Golf/Putt-Putt Courses (number) _____ 0

Golf Driving Ranges (number) _____ 0

SWIMMING

Swimming (number of pools) _____ 0

Swimming (total sq. ft. area of pools) _____ 0

Non-Pool Swimming Areas (number) _____ 0

PLAYGROUNDS

Equipped Playgrounds (number) _____ 1

Equipped Tot Lots (number) _____ 0

TRAILS

Hiking/Nature Trails (number) _____ 0

Hiking/Nature Trails (miles) _____ 0

Hiking/Nature Trails (names) _____

Running/Jogging Trails (number) _____ 0

Running/Jogging Trails (miles) _____ 0

Running/Jogging Trails (names) _____

Exercise Trails/Fitness Course (number) _____ 0

Is there a Running Track at the Site? _____ No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	0
Fishing Piers or Docks (total number)	_____	0
Are there Handicap. Access. Piers/Docks at the Site?	_____	No
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	5
Picnic Shelters/Pavilions (number)	_____	1
Are there Handicap. Access. Picnic Facilities at the Site?	_____	Yes

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	0
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	16
Are Handicap. Parking Spaces Available?	_____	Yes
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	Yes
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	0
Is there a Community/Recreation Center on the Site?	_____	No
Comments?		

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK/REC SITE Worthington Park

CLOSEST MAJOR HIGHWAY

SITE LOCATION\ADDRESS Located at the corner of Worthington and Missouri Streets

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Park and Recreation

LAST INV. DATE 7/93,

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres) _____

14

Recreational Water Area (acres) _____

0

PLAYING FIELDS

Baseball/softball fields - unlighted (number) _____

0

Baseball/softball fields - lighted (number) _____

0

Open Play Fields (number) _____

1

Soccer Fields (number) _____

1

COURTS

Tennis Courts - Unlighted (number) _____

0

Tennis Courts - Lighted (number) _____

0

Basketball Goals - Unlighted (number) _____

0

Basketball Goals - Lighted (number) _____

0

GOLF

Golf Course (number of holes) _____

0

Miniature Golf/Putt-Putt Courses (number) _____

0

Golf Driving Ranges (number) _____

0

SWIMMING

Swimming (number of pools) _____

0

Swimming (total sq. ft. area of pools) _____

0

Non-Pool Swimming Areas (number) _____

0

PLAYGROUNDS

Equipped Playgrounds (number) _____

1

Equipped Tot Lots (number) _____

1

TRAILS

Hiking/Nature Trails (number) _____

1

Hiking/Nature Trails (miles) _____

1.4

Hiking/Nature Trails (names) _____

Running/Jogging Trails (number) _____

0

Running/Jogging Trails (miles) _____

0

Running/Jogging Trails (names) _____

Exercise Trails/Fitness Course (number) _____

0

Is there a Running Track at the Site? _____

No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	0
Fishing Piers or Docks (total number)	_____	0
Are there Handicap. Access. Piers/Docks at the Site?	_____	No
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	10
Picnic Shelters/Pavilions (number)	_____	0
Are there Handicap. Access. Picnic Facilities at the Site?	_____	Yes

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	1
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	40
Are Handicap. Parking Spaces Available?	_____	Yes
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	Yes
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	0
Is there a Community/Recreation Center on the Site?	_____	No
Comments?		

12:36:28 PM

DOES LOCALITY HAVE LAND OR. FAC.?

NAME OF PARK/REC SITE Tilden-Rogers Complex

CLOSEST MAJOR HIGHWAY

SITE LOCATION/ADDRESS 826 N. Airport Road

OPER. BODY City

COUNTY Crittenden

CITY West Memphis

OPER. AGENCY City of West Memphis

OWNER City of West Memphis

CONTACT PERSON Scott McKinney-Park and Recreation

LAST INV. DATE 7/93.

PHONE NUMBER 732-7610

US CONGRESS. DIST. 1 - Lambert

STATE SEN. DIST.

STATE REP. DIST.

SIZE OF THE AREA

Recreational Land Area (acres) _____

88

Recreational Water Area (acres) _____

11

PLAYING FIELDS

Baseball/softball fields - unlighted (number) _____

0

Baseball/softball fields - lighted (number) _____

9

Open Play Fields (number) _____

0

Soccer Fields (number) _____

0

COURTS

Tennis Courts - Unlighted (number) _____

0

Tennis Courts - Lighted (number) _____

12

Basketball Goals - Unlighted (number) _____

0

Basketball Goals - Lighted (number) _____

0

GOLF

Golf Course (number of holes) _____

0

Miniature Golf/Putt-Putt Courses (number) _____

0

Golf Driving Ranges (number) _____

0

SWIMMING

Swimming (number of pools) _____

0

Swimming (total sq. ft. area of pools) _____

0

Non-Pool Swimming Areas (number) _____

0

PLAYGROUNDS

Equipped Playgrounds (number) _____

1

Equipped Tot Lots (number) _____

0

TRAILS

Hiking/Nature Trails (number) _____

0

Hiking/Nature Trails (miles) _____

0

Hiking/Nature Trails (names) _____

Running/Jogging Trails (number) _____

0

Running/Jogging Trails (miles) _____

0

Running/Jogging Trails (names) _____

Exercise Trails/Fitness Course (number) _____

0

Is there a Running Track at the Site? _____

No

TRAILS (cont'd)

Bicycle Trails (number)	_____	0
Bicycle Trails (miles)	_____	0
Bicycle Trails (names)	_____	
ORV Trails (number)	_____	0
ORV Trails (miles)	_____	0
ORV Trails (names)	_____	
Horse Trails (number)	_____	0
Horse Trails (names)	_____	
Horse Trails (miles)	_____	0

WATER ACCESS

Fishing (surface acres of water)	_____	11
Fishing Piers or Docks (total number)	_____	1
Are there Handicap. Access. Piers/Docks at the Site?	_____	Yes
Boating (number of launching ramps)	_____	0
Marina (number of slips or stalls)	_____	0

CAMPING

Camping - RV/Trailer Sites (number)	_____	0
Camping - Tent Sites (number)	_____	0
Camping - Cabins/Shelters (number)	_____	0
Camping - Primitive (acres)	_____	0

PICNIC FACILITIES

Picnic Tables (number)	_____	24
Picnic Shelters/Pavilions (number)	_____	1
Are there Handicap. Access. Picnic Facilities at the Site?	_____	Yes

RANGES

Rifle/Pistol Ranges (number of positions)	_____	0
Skeet/Trap Ranges (number of positions)	_____	0
Archery Ranges (number of positions)	_____	0

OTHER FACILITIES

Is there a Rodeo Arena at the Site?	_____	No
Amphitheater (number)	_____	0
Arboretum (number)	_____	0
Vehicle Parking (number of spaces)	_____	344
Are Handicap. Parking Spaces Available?	_____	Yes
Are Restroom Facilities Available at the Site?	_____	Yes
Are the Restroom Facilities Handicap Accessible?	_____	Yes
Are there Water Fountains Located at this Site?	_____	Yes
Concession Stands/Snack Bars	_____	2
Is there a Community/Recreation Center on the Site?	_____	No
Comments?		

STB

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6-6-96

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ENVIRONMENTAL
MATERIAL



84247

Environmental
Document

P.O. Box 1900
Reno, Nevada 89505

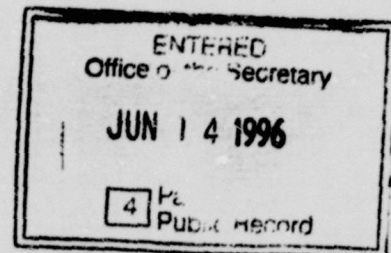
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May 30, 1996

Mr. Vernon A. Williams
Secretary
Surface Transportation Board
1201 Constitution Avenue, N.W., Room 3219
Washington, D.C. 20423

Attn: Ms. Elaine Kaiser, Chief
Section of Environmental Analysis

Subject: Union Pacific/Southern Pacific
Railroad Merger Environmental Assessment



As a follow-up to your visit to the City of Reno and in response to your conversation on May 22, 1996, with our Environmental Team, please find attached a copy of a memorandum from Carl Cahill, Director of Washoe County District Health Department to Jerry Hall dated February 28, 1996, elaborating on railroad hazardous material incidents.

This memo was submitted to the Surface Transportation Board (STB) as an attachment to our *Comments and Verified Statement*, submitted to the STB on March 29, 1996.

In response to your request for clarification of the number of trains ("38") used in the City of Reno's *Comments on Preliminary Draft Environmental Assessment*, submitted to the STB, dated May 3, 1996, I refer you to the "Fact Finding Report", Section 8, attached to our *Comments and Verified Statement*, submitted to the STB, on March 29, 1996 (pgs. 12-13 attached).

We anticipate Jerry Hall's team will be responding to you directly on the "number of trains" matter.

If we can provide any additional information or clarification on the City of Reno's comments please do not hesitate to call.

Sincerely,

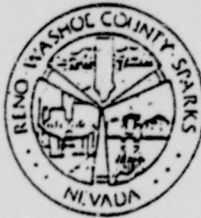
Ralph Jaeck
Assistant City Manager

cc: Colleen Bathker, Summit Envirosolutions, Inc.
Eric Ruby, WESTEC, Inc.
Mark A. Demuth, MADCON Consultation Services
Jerry Hall, Strategic Project Management, Inc.

Item No. _____

Page Count _____

Jan 114



DISTRICT HEALTH DEPARTMENT

DATE: February 28, 1996
TO: Jerry Hall
FROM: Carl Cahill, Director
SUBJECT: Railroad Issues

Per your request, the following information is provided:

RAILROAD INCIDENTS

Washoe County District Health Department (WCDHD) was notified (not by fire or emergency management authorities) of a derailed train near the Sparks yard and WCDHD investigated. Two Liquified Petroleum Gas (LPG) tank cars derailed less than 100 yards west of the McCarran Avenue overpass just before noon. Upon arrival no fire response personnel were present. Shortly after, it was reported that a long train with many railcars loaded with explosives came into the area and parked alongside the derailed cars. Fortunately, the LPG cars did not leak and there was no further incident.

Local agencies responded to a train derailment caused by a switching error in which two trains collided at the Rock Boulevard overpass in Sparks. The saddle tanks on the train were ruptured, spilling diesel fuel which required remediation. Fortunately, no rail cars fell off the overpass and no other hazardous materials were involved.

Local agencies have responded to two large phosphoric acid spills at the Sparks terminal. Both spills were in the range of 6,000 gallons each. One tank car leaked acid along the tracks all the way to the Washoe County line to the east - a distance of over 20 miles. Both spills were caused by tank failure.

Local agencies have responded to several incidents of train tank cars containing anhydrous ammonia in which ammonia odors were detected along the tracks. The largest involved a train of 22 tank cars of ammonia. The problems encountered have been caused by the pressure relief valve venting excess pressure caused by the change in vapor density due to the difference in elevation and weather

conditions here and at the loading facility.

Another railcar venting incident occurred when a tank car loaded with wine spirits (95% ethanol) was found leaking severely at the top hatch flange. A large puddle of flammable alcohol also formed under the tank car. Again, the vapor pressure inside the car was much more than atmospheric pressure. Instead of attempting to tighten the flange bolts it was recommended to open the pressure relief valve which had not functioned. This equalized pressure in the tank car and a clean-up of the track area was conducted.

On Thanksgiving morning, local agencies responded to a train accident in which a semi-tractor trailer got stuck on the track crossing at Patrick and could not move. Local residents attempted to pull the vehicle off the tracks with their private vehicles but were unsuccessful. An eastbound train did not see the truck in time to stop and struck the truck rupturing its fuel tanks. The fuel along the tracks ignited along the 1/4 mile it took to stop the train. No other hazardous material was involved.

WCDHD was informed several days after the occurrence of a fuel spill along the tracks west of Reno. It was determined that a boulder rolled down the hill in the Mayberry area and struck the locomotive's saddle tank tearing a hole in it. The engineer was unaware of the incident until he reached the terminal. The amount of fuel spilled was not a quantity which could be cleaned up because it sprayed lightly along the track.

These are just some of the rail related incidents WCDHD and other local agencies have responded to - more than 20 in the past 8 years. Others incidents include releases from valves which could be closed, rupturing of drums or other containers that were being transported, and transloading operations. These incidents have occurred on both Union Pacific and Southern Pacific lines, and in some cases, have required extensive response and clean-up activities and severely depleted the local community manpower and equipment resources.

RECOMMENDATIONS

The following suggestions are presented for discussion:

1. Electronic control measures should be looked at for isolation and diversion of the ditch system, which is fed from the Truckee River. The ditch system flows throughout the Truckee Meadows Basin. If a hazardous material were to get into the river upstream from ditch entrances no expedient method to shut the flow off is available, allowing the contaminant to flow unabated.

contaminant to flow unabated. These ditches flow through many residential subdivisions, through populated industrial areas, and significant water recharge areas.

2. Road access to the rail line must be improved to allow vehicle access for emergency responders to an accident. Throughout Washoe County the Southern Pacific line can be extremely difficult to access for single vehicles, let alone a county-wide response to a hazardous materials incident along the tracks. Where there is locked gate access to the rails keys should be provided to certain agencies for emergency response and remediation activities.
3. With the increased potential of hazardous materials incidents originating from rail transportation, local railroad response personnel must be available and trained to the level needed when dealing with rail and tank cars. This is not the case at this time. The closest Hazardous Materials Control Officer in the Southern Pacific system who would respond to the Sparks terminal is stationed in Sacramento and when he is not available, one must be dispatched by vehicle from Oakland. This is seriously inadequate for this community. A Hazardous Materials Control Officer should be stationed at the Sparks Terminal to respond to Nevada incidents.
4. Due to the limited hazardous materials response capability from the private sector, additional spill control and containment equipment must be strategically located in the area and made available for immediate use by responding agencies. This must include such things as containment booms, absorbent materials, pneumatic transfer pumps, and other specialized equipment.
5. In conjunction with the railroad company, install a computer system or devise a method in which responding agencies could have immediate access to waybills, consists, or other documentation pertinent to transportation of hazardous materials through the terminal.
6. Provide specialized training to responding agencies in Nevada and eastern California who are involved with emergency response to railroad accidents. Hazardous materials incident response in the Truckee River corridor on the California side has a direct bearing on emergency actions taken by local agencies.
7. Working with Local Emergency Planning Committees (LEPC),

February 28, 1996
Railroad Issues
Page Four

the railroad should provide funding and resources in developing evacuation and emergency action plans for the populated areas along the rail corridor.

8. Installation of crossing signals and gates at all at-grade crossings in the Truckee River corridor and watershed should be considered.
9. Enhanced notification procedures should be developed for reporting of rail incidents. Current procedures call for railroad personnel to contact their Denver office, who in turn make the calls within their system and to appropriate agencies, which sometimes causes delays in local response time.

The State commissioned a study which revealed widespread presence of chlorinated solvents at relatively low concentrations. These pollutants have also been discovered in at least one municipal well (Morrill Street site). The Washoe County Regional Water Management Agency is pursuing the creation of a remediation district encompassing most of the downtown to effect a clean-up.

5.0 IMPACTS OF MERGER

5.01 Proposed Merged UP/SP Operations

The merged railroads' operating plan (Plan) included in the merger application shows one passenger and 20 freight trains per day through Reno for an increase of 7 trains per day from current levels.¹⁶ The Plan calls for an increase in train tonnage through Reno from the present level of 20 million to 53 million gross tons per year, an increase of 63%. However, the Plan's estimates are not consistent and don't seem to match historic data or projected future traffic levels. For instance, the numbers in the Plan do not include Burlington Northern Santa Fe (BNSF) trains, Reno Fun trains, Ski and special excursion trains, or local operations. The environmental report section of the merger application, however, indicates an increase in train traffic of 9 trains per day,¹⁷ which is different than Volume 3. Also, the Plan only looks at what traffic levels will be the day after the merger changes and construction projects take place with no provision for growth.

The Plan showing 21 trains per day does not include the expected 6 BNSF trains, 1 Reno fun or ski train, or 2 local switching movements. In addition, it shows 10 trains diverted away from the UP's Feather River route while only 7 are added to the Donner route.¹⁸ Based on conversations with SP operating officers we believe that some trains might be diverted from the Feather River or Donner Pass routes to other rail routes including Roseville to Oregon and Roseville to southern California. We cannot, however, account for all trains removed from the Feather River route. We also believe that the Plan does not account for peak volumes that occur seasonally.

¹⁶ ICC Finance Docket # 32760, Railroad Merger Application, Volume 3, Page 385.

¹⁷ Ibid., Volume 6, Page 2, Pages 56 and 93.

¹⁸ The 7 trains would increase to 9 if the figures in Volume 6, Part 2 are used.

We estimate that actual post-merger traffic will be 34 through-freight, 2 passenger (on average), and 2 local trains per day through Reno for a total of 38 trains per day.¹⁹ Historical trends factored into this estimate take into account the 22 trains per day moving through Reno in 1980,²⁰ the former Western Pacific Railroad (WP) operation of 6 trains per day, anticipated BNSF traffic of 6 trains per day,²¹ expected and historic passenger train activity at 2 trains per day on average, and 2 movements of the local switch engine between Sparks and West Reno. This projection also takes into account the growth anticipated in rail traffic in and out of the Port of Oakland as part of their major expansion plans. The Port of Oakland is anticipating 6% average annual growth in rail demand. With UP's enhanced competitive position over the central corridor brought on by this merger, intermodal traffic through Reno should grow at a rate at least equivalent to this rate.²²

Southern Pacific historically operated over Donner Summit with trains that ranged up to 8,000 feet in length and 10,000 tons. Trains of 7,000 feet (8,000 tons) or greater generally required helper locomotives to negotiate the 2.6% grade and heavy curvature. SP trains historically averaged around 6,000 feet in length.²³ Union Pacific operating personnel have indicated that they will probably operate most trains on this route without helper locomotives, indicating that most trains will not exceed 7,000 feet. We believe average post-merger train lengths will be around 6,500 feet with a few in the 7,000 to 8,000 foot range using helper locomotives. UP could, however, choose to operate standard-length 8,000 foot trains should business and locomotive availability favor the use of helper locomotives on this route segment.

Hazardous materials are most generally handled in manifest trains under strict positioning rules and regulations. Cars must be placarded identifying the commodity or chemical being moved. According to statistics from the American Association of Railroads (AAR) movement of these chemicals by rail is considerably safer than movement over the road. It is possible that a modest increase of this traffic will occur through Reno as a result of this merger. However, heavier and slower manifest trains most likely to carry these commodities will probably be routed

¹⁹ Based on the knowledge of railroad operating specialists and historical trends in northern Nevada.

²⁰ 1980 represents the year of the Reno trainway bond issue vote.

²¹ Verified statement of Mr. Neal D. Owen in BN/Santa Fe's Comments on the Primary Application, December 29, 1995, representing a possible diversion from their Southern California to Chicago route. This study assumes all 6 BNSF trains will use the Donner Pass route due to its reduced operating costs. Diversion to the Feather River route would reduce this number; however, increases due to additional business could offset these reductions.

²² Western Region Automotive Intermodal Terminal Rationalization, Revised 9/21/95, Page 13, indicates that 50,000 additional containers will be handled through the Oakland railroad intermodal yards per year, post merger, due to truck-to-rail traffic diversions.

²³ According to a former SP Sacramento Division operating superintendent.

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Page Count 5
JUNE, 1996 #98

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4 June, 1996

Elaine K. Kaiser, Esq.
Chief, section of Environmental Analysis
Surface Transportation Board
12th & Constitution Ave., N.W.
Washington, DC 20423-0001

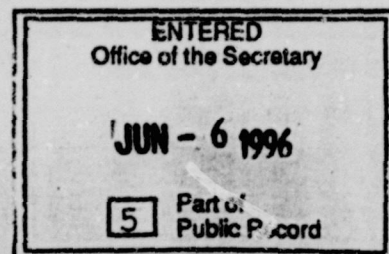
Re: ~~Union Pacific~~ -- Control and Merger -- Southern Pacific, Finance Dkt.
32760 -- Abandonment of Hope to Bridgeport Line in Kansas, AB-3
(Sub-no. 131) and AB-8 (Sub-no. 37)

Dear Ms. Kaiser:

This letter, on behalf of Serenata Farms Equestrian Therapy Foundation (SFETF) is in response to the environmental assessment required by the Surface Transportation Board in the above proceeding. SFETF is a non-profit corporation specializing in preserving out of service rail lines for future transportation purposes in the state. SFETF is the holding organization for the Union Pacific line between Osawatomie and Herington Kansas and would like to preserve this property as one continuous corridor. SFETF intends to use this corridor for compatible interim public uses, including especially use as recreational trails. The Hope to Bridgeport line would be a logical extension of our Osawatomie to Herington project.

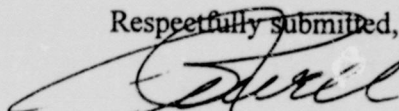
Loss of important transportation corridors unequivocally would constitute a significant adverse environmental impact flowing from the merger proceeding. A full EIS evaluating the merger-related abandonment should be prepared to ensure the adverse impacts of loss are fully mitigated. The only way to avoid the EIS requirement would be to condition the merger authority so as to ensure that the various corridors are preserved for railbanking/interim trail use purposes, at least in all instances in which a qualified entity files a "statement of Willingness" as provided in 49 C.F.R. § 1152.29 (invocation of Trails Act). The Commission has broad authority to condition mergers to protect the public interest, and this extends to authority to require mitigation of adverse consequences flowing from merger-related abandonments. SFETF is filing a statement of willingness in connection with the Hope to Bridgeport line in AB-3 (Sub-no. 131).

The Kansas Horse Council, Kansas Horse Foundation, Kansas Trails Council, and SFETF all support preservation of the Bridgeport to Hope line as a railbanked trail.



By my signature below, I certify service on the date above by U.S. Mail, postage pre-paid, first class, as indicated in the Appendix annexed to this letter.

Respectfully submitted,



Bud Newell

Serenata Farms Equestrian Therapy Foundation
1895 E. 56 Rd.
Lecompton, KS 66050

Of counsel:

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Hon. Jerome Nelson
Administrative Law Judge
Federal Energy Regulatory commission
825 North Capitol, N.W.
Washington, DC 20426

BEFORE THE SURFACE TRANSPORTATION BOARD

The Denver and Rio Grand. Western
Railroad Company -- Discontinuance
of Trackage -- Hope-Bridgeport Line
in Dickinson and Saline Counties, KS

Missouri Pacific Railroad Company --
Abandonment -- Hope-Bridgeport Line
in Dickinson and Saline Counties, KS

AB-8 (Sub-no. 37)

AB-3 (Sub-no. 131)



[merger-related: Finance Dkt. 32760, UP/SP]

Statement of Willingness to Assume
Financial Responsibility

Item No. _____

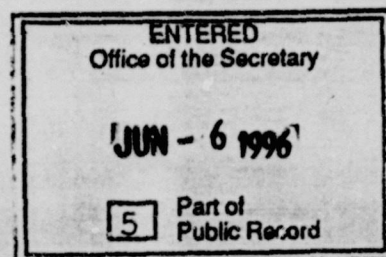
Page Count 2
JUNE, 1996 #95

In order to establish interim trail use and rail banking under 16 U.S.C. 1247(d) and 49 CFR 1152.29, the Serenata Farms Equestrian Therapy Foundation (hereinafter "SFETF" or "interim Trail User"), is willing to assume full responsibility for management of, for any legal liability arising out of (unless the user is immune from liability, in which case it need only indemnify the railroad against any potential liability), and for the payment of any and all taxes that may be levied or assessed against the right-of-way owned and operated by Missouri Pacific Railroad Company ("Railroad"), with trackage rights held by The Denver and Rio Grande Western Railroad Company ("DRG") The property extends from MP 459.20 near Hope to MP 491.20 near Bridgeport, a distance of approximately 31.24 miles (an equation at MP 478.05 = 478.81) in Dickinson and Saline counties, Kansas. The right of way is part of a line proposed for abandonment in Docket AB-3 (Sub-no. 131), and for discontinuance of trackage rights in Docket AB-6 (Sub-no. 37).

A map depicting the property is attached.

SFETF acknowledges that use of the right-of-way is subject to the user's continuing to meet its responsibilities described above and subject to possible future reconstruction and reactivation of the right-of-way for rail service. A copy of this statement is being served on the Railroads on the same date it is being served on the Commission.

Bud Newell
Serenata Farms Equestrian Therapy Foundation
1895 E. 56 Rd.
Lecompton, KS 66050
(913) 887-6422



Counsel:

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426 NW 162d St.
Seattle, WA 98177
(206) 546-1936

cc. Robert Opal, Esq.
Union Pacific Railroad
1416 Dodge St.
Omaha, NE 68179

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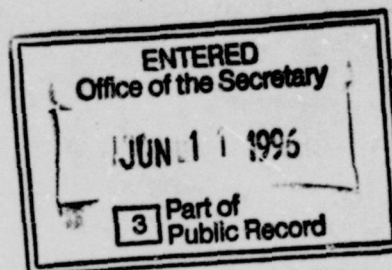
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ENVIRONMENTAL
MATERIAL 84055

4 June, 1996



Elaine K. Kaiser, Esq.
Chief, section of Environmental Analysis
Surface Transportation Board
12th & Constitution Ave., N.W.
Washington, DC 20423-0001

Re: Union Pacific -- Control and Merger -- Southern Pacific, ~~Finance Dkt~~
~~32760~~ -- Abandonment of Hope to Bridgeport Line in Kansas, AB-3
(Sub-no. 131) and AB-8 (Sub-no. 37)

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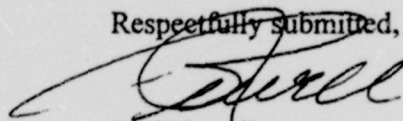
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Item No. _____
Page Count 5
160 # 95

By my signature below, I certify service on the date above by U.S. Mail, postage pre-paid, first class, as indicated in the Appendix annexed to this letter.

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The Denver and Rio Grand. Western
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AB-8 (Sub-no. 37)

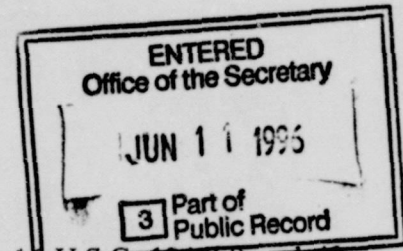
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AB-3 (Sub-no. 131)

[merger-related: Finance Dkt. 32760, UP/SP]

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STB

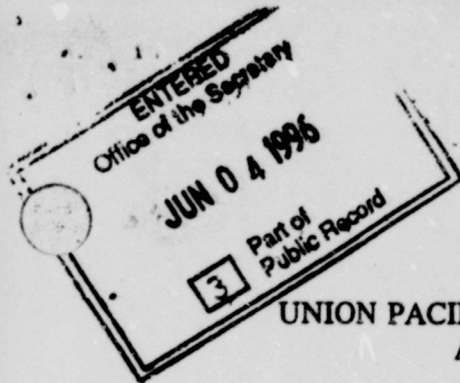
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UP/SP-261

6/4/96 2:35:38 AM

BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY
AND MISSOURI PACIFIC RAILROAD COMPANY
-- CONTROL AND MERGER --
SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY
COMPANY, SPCSL CORP. AND THE DENVER AND
RIO GRANDE WESTERN RAILROAD COMPANY

APPLICANTS' REPLY TO KCS' COMMENTS
ON SUPPLEMENTAL ENVIRONMENTAL INFORMATION

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Union Pacific Railroad Company and
Missouri Pacific Railroad Company

ENVIRONMENTAL DOCUMENT

Page Count
Item No.
JUN 3, 1996



BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY
AND MISSOURI PACIFIC RAILROAD COMPANY
-- CONTROL AND MERGER --
SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY
COMPANY, SPCSL CORP. AND THE DENVER AND
RIO GRANDE WESTERN RAILROAD COMPANY

APPLICANTS' REPLY TO KCS' COMMENTS
ON SUPPLEMENTAL ENVIRONMENTAL INFORMATION

Union Pacific Corporation ("UPC"), Union Pacific Railroad Company ("UPRR"), Missouri Pacific Railroad Company ("MPRR"),^{1/} Southern Pacific Rail Corporation ("SPR"), Southern Pacific Transportation Company ("SPT"), St. Louis Southwestern Railway Company ("SSW"), SPCSL Corp. ("SPCSL"), and The Denver and Rio Grande Western Railroad Company ("DRGW"),^{2/} collectively, "Applicants," submit this reply to "The Kansas City Southern Railway Company's Comments on Supplemental Environmental Information" (KCS-58).

KCS' pleading purports to offer comments on the supplemental environmental information submitted by Applicants on May 21, 1996, but its wide-ranging

^{1/} UPC, UPRR and MPRR are referred to collectively as "Union Pacific." UPRR and MPRR are referred to collectively as "UP."

^{2/} SPR, SPT, SSW, SPCSL and DRGW are referred to collectively as "Southern Pacific." SPT, SSW, SPCSL and DRGW are referred to collectively as "SP."

pleading offers very few comments on that information. Instead, KCS uses the pretext of commenting on Applicants' information to seek various forms of procedural relief and pursue other objectives. Specifically, KCS in substance petitions the Board or the Board's Section of Environmental Analysis ("SEA") to conduct additional environmental studies and issue a new Environmental Assessment ("EA") (pp. 1-2, 17-18, 23-24, 26, 34, 35, 37), to reject all environmental information filed by Applicants (p. 4), to make new findings regarding terminal trackage rights (which have nothing to do with the supplemental information) (pp. 32-33) and to accept briefing and evidence on a variety of subjects in circumvention of the 50-page limit governing briefs. More generally, KCS-58 is part of KCS' ongoing campaign to delay this proceeding (e.g., KCS-49; KCS-57; KCS-58, pp. 17-18, 34, 37).

Applicants will confine this response to correcting KCS' misleading arguments and its misuse of deposition testimony.

A. KCS' Calls for Delay and a New EA

No one can take issue with KCS' proposition that "SEA has an affirmative duty to conduct an independent review and investigation of the operational changes in connection with this merger and their associated environmental impacts." KCS-58, p. 35. As KCS notes (p. 36 n.7), SEA is fulfilling that duty in part by requesting supplemental information from Applicants, and it is conducting its own inquiries of other parties.

It does not follow, however, that SEA must start the entire environmental assessment process from scratch by issuing a new EA every time it acquires new in-

formation, as KCS repeatedly argues (pp. 2, 4, 34, 35, 37). Nothing in the Board's regulations requires reissuance of an EA in these circumstances, and KCS cites no decision as precedent for its position. Under the procedure demanded by KCS, SEA cannot consider information submitted in comments on an EA or obtained in response to independent SEA inquiries without issuing a new EA and seeking a new round of public comments (p. 35). This would lead to a virtually endless cycle of EA promulgations and comments, because SEA would be required to restart the entire process each time it receives and makes use of additional facts.

B. KCS' Claims About BN/Santa Fe Traffic

KCS continues to attempt to mislead the Board into believing that the record does not include a study of the traffic impacts of the BN/Santa Fe and CMA settlement agreements. KCS-50, pp. 5-6; KCS-58, pp. 5-10. That is incorrect.

Although BN/Santa Fe did not perform such a traffic study, Applicants did. They performed a thorough study which evaluated the effects of the BN/Santa Fe settlement (UP/SP-23, Peterson, pp. 292-99), took account of those traffic diversions in preparing their Operating Plan, offered witnesses for cross-examination, provided voluminous supporting workpapers, and, after other parties submitted different traffic estimates, submitted detailed rebuttal testimony (UP/SP-231, Peterson, pp. 161-94), again supported by workpapers and cross-examination.

In the original Traffic Study described in the application, Applicants assumed that BN/Santa Fe would be able to compete effectively for traffic using the BN/Santa Fe trackage rights, including traffic routed via St. Louis (UP/SP-23, Peterson,

pp. 292-99). The later CMA agreement merely addresses concerns raised by some parties about this assumption. As KCS knows, but never discloses in KCS-58, it elicited testimony from Applicants' traffic expert at a May 8 deposition that "we don't anticipate any sizable changes in traffic diversions or traffic flows because of the CMA settlement." Peterson Dep., May 8, 1996, pp. 295-96 (copy attached). KCS elected not to explore the bases for Mr. Peterson's judgments, although he was prepared to describe them.

KCS relies on the testimony of BN/Santa Fe's operating consultant, Neal D. Owen, for the proposition that the CMA agreement may stimulate additional traffic, but KCS leaves unanswered the question, "Additional to what?" KCS-58, pp. 5, 8-9. Since BN/Santa Fe did not perform its own traffic study, and Mr. Owen is an operating expert, not a traffic expert, KCS did not establish that Mr. Owen knew anything about Applicants' Traffic Study. KCS did not even ask him about it. The entire foundation for KCS' argument is a mirage.^{3/}

Equally faulty is KCS' claim that the record contains no information about internal reroutes of BN/Santa Fe's current traffic due to new trackage rights. KCS-58 pp. 8-9. Applicants evaluated the changes in traffic volumes resulting from BN/Santa Fe internal reroutes, and included the resulting data in their Environmental

^{3/} KCS' lengthy discussion of traffic at West Lake Charles (KCS-58, pp. 6-8) is vastly overblown. That area generates a significant amount of traffic, but the CMA agreement expands BN/Santa Fe access only to the comparatively modest volumes of traffic moving between the Lake Charles area and Mexico or the New Orleans gateway. Moreover, shipments diverted from SP to BN/Santa Fe would continue to use the same tracks as today, so there would be no environmental impact.

Report. See also UP/SP-231, Peterson, pp. 169, 178-79, 184-85. Mr. Owen's testimony on the subject is again irrelevant, because the EA is based on reroute data from Applicants' study, not from BN/Santa Fe or Mr. Owen.

C. KCS' Arguments About the BN/Santa Fe Implementation Process

KCS has become fixated in recent weeks on BN/Santa Fe's aggressive efforts to be fully prepared to commence operations under the BN/Santa Fe settlement agreement as soon as possible after the merger is approved. With Applicants' cooperation, BN/Santa Fe is pursuing operating details and implementation issues that normally are not addressed until after a merger is approved. UP/SP-231, Rebensdorf, pp. 2-4. (For example, SP was not able to commence all operations over the trackage rights it obtained in the BN/Santa Fe merger proceeding until March, 1996 (KCS-58, p. 18 n.5).) KCS attempts to construe this implementation process as creative massive uncertainty that makes environmental evaluation impossible. KCS-58, pp. 10-18.

KCS does not explain how any of the items being negotiated would affect environmental analysis. For example, KCS discusses the details of BN/Santa Fe's use of the SIT yard at Dayton, Texas (p. 15), but it does not claim that BN/Santa Fe would be unable to use the yard as contemplated or that its use of the yard would have substantial environmental impacts. Similarly, KCS refers to negotiations about the "physical parameters of where the two-to-one locations start and stop, by a milepost, switching limit" (p. 16). But it does not explain why the definition of those limits would make any difference for environmental analysis. And how is the environment affected if a shipper

is served by a third-party switch engine instead of a UP/SP switch engine (pp. 11-13).

KCS offers no theory.

KCS also focuses on transitional details, such as whether, at the outset, BN/Santa Fe will briefly use UP/SP haulage or immediately use its own trains (pp. 14-15). But SEA should evaluate full implementation of the merger, not how BN/Santa Fe will initiate operations in the days and weeks immediately following consummation. Apparently, KCS wants a separate environmental evaluation of each evolutionary operating decision.

KCS established during its deposition questioning that none of these implementing details is significant. As Mr. Owen testified in response to a KCS inquiry, the issues under discussion today will not affect any of the train frequencies and operations he predicted in his written testimony. Owen Dep. Tr., May 9, 1996, pp. 14-15 (copy attached). Similarly, Mr. Ongerth explained to KCS' counsel that the types of issues being discussed today by BN/Santa Fe, UP and SP are details normally resolved after approval of a merger, as exemplified by the fact that UP and SP themselves have not even started their own merger implementation process. Ongerth Dep. Tr., May 17, 1996, pp. 46-47 (copy attached).

D. The Alleged "Environmental Audit"

KCS devotes almost six pages to its claim that Applicants are preparing an "environmental audit" of all the UP and SP lines BN/Santa Fe will use, which will disclose the locations of hazardous materials spill sites (pp. 27-32). KCS claims that SEA must have this audit, but does not explain why (p. 32). Applicants provided

information on "known hazardous waste sites" along their properties, as required by Commission regulations, in Part 6 of their Environmental Report. UP/SP-27. More important, no one contends that either the merger or the BN/Santa Fe agreement would have any effect on any such site, except possibly along lines to be abandoned.

As a precaution, Applicants will promptly determine whether the implementation process has identified any additional hazardous waste sites during BN/Santa Fe inspections of UP and SP lines and will provide any such information to SEA. However, the alleged "environmental audit" does not exist. That is a term used repeatedly by KCS' lawyers in questioning Applicant witnesses, but the testimony of Messrs. Rebensdorf and Clifton, quoted at length by KCS, shows that the witnesses never adopted that term and merely described the inspections previously disclosed to the Board. See KCS-58, pp. 29-33. KCS' lengthy excerpt from Mr. Ongerth's testimony (KCS-58 at 27-29), which KCS falsely claims is about "The Audit" (p. 27), is not about this case at all, and is merely a general discussion of how environmental issues are handled in joint facility agreements, which, accordingly to Mr. Ongerth, is normally by indemnification, not audit. Ongerth Dep. Tr., May 17, 1996, pp. 17-18 (copy attached). KCS invented "The Audit."

E. KCS' Comments on Terminal Trackage Rights

KCS' inapposite comments about its opposition to terminal trackage rights for BN/Santa Fe in Beaumont and Shreveport (pp. 32-33) make little sense. KCS maintains that its own arguments against terminal trackage rights are so powerful that SEA must consider alternatives routings for BN/Santa Fe traffic that would use those

segments. As Applicants have already demonstrated, KCS' arguments consist of smoke and mirrors, are utterly without precedent, and in every respect are contradicted by the directly opposite arguments made by its own affiliate, Tex Mex. UP/SP-232, Tab F. In any event, denial of the terminal trackage rights request would so thoroughly disrupt BN/Santa Fe service that there would be no viable alternative to evaluate.

CONCLUSION

For the foregoing reasons, the Board should not agree to the delays requested by KCS, and the Board and SEA should exercise caution before relying on KCS' characterizations of the record.

Respectfully submitted,

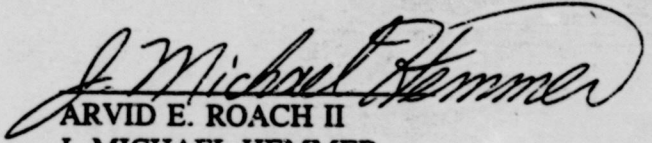
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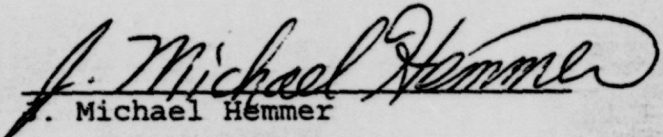
June 3, 1996

CERTIFICATE OF SERVICE

I, J. Michael Hemmer, certify that, on this 3rd day of June, 1996, I caused a copy of the foregoing document to be serviced by first-class mail, postage prepaid, or by a more expeditious manner of delivery on all parties of record in Finance Docket No. 32760, and on

Director of Operations
Antitrust Division
Suite 500
Department of Justice
Washington, D.C. 20530

Premarmer Notification Office
Bureau of Competition
Room 303
Federal Trade Commission
Washington, D.C. 20580


J. Michael Hemmer

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BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD
COMPANY AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN
PACIFIC TRANSPORTATION COMPANY, ST. LOUIS
SOUTHWESTERN RAILWAY COMPANY, SPCSL CORP. AND THE
DENVER AND RIO GRANDE WESTERN RAILROAD COMPANY

HIGHLY CONFIDENTIAL

Washington, D.C.

Wednesday, May 8, 1996

Deposition of RICHARD B. PETERSON, a
witness herein, called for examination by counsel
for the Parties in the above-entitled matter,
pursuant to agreement, the witness being duly
sworn by JAN A. WILLIAMS, a Notary Public in and
for the District of Columbia, taken at the
offices of Covington & Burling, 1201 Pennsylvania
Avenue, N.W., Washington, D.C., 20044, at
10:05 a.m., Wednesday, May 8, 1996, and the
proceedings being taken down by Stenotype by
JAN A. WILLIAMS, RPR, and transcribed under her
direction.

1 about a customer's requirements and things like
2 that. So yes, we participate. It's not -- you
3 know, given the incredibly short time frames and
4 the amount of work to be done, each person pretty
5 much has to concentrate on his own assignment.
6 But we coordinate to the extent we can.

7 Q. Have there been meetings with regard to
8 the operating plan because of or since the CMA
9 agreement has been entered into?

10 A. I have not attended -- well, I seldom
11 attend meetings involving the operating plan.
12 The involvement I have would be a phone call or
13 something of that nature to answer a question or
14 to do something of that nature.

15 With regard to the CMA agreement, I'm
16 not aware of any meetings that have been held to
17 restructure the operating department or --
18 restructure the operating plan or change the plan
19 in any major way or anything like that.

20 Q. Will the CMA agreement result in a
21 change to your proposed operating plan?

22 A. Well, I can't answer that with
23 certainty. But I would doubt it mainly because
24 we don't anticipate any sizable changes in
25 traffic diversions or traffic flows because of

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1 the CMA agreement.

2 MR. MOLM: No further questions.

3 (Thereupon, at 8:15 p.m., the taking of
4 the instant deposition ceased.)
5

6

7

8

Signature of the Witness

9

SUBSCRIBED AND SWORN to before me this _____

10 day of

11 _____, 19__.

12

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14

NOTARY PUBLIC

15 My Commission Expires

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17

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BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

Union Pacific CORPORATION, Union Pacific RAILROAD
COMPANY AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL MERGER --

Southern Pacific RAIL CORPORATION, SOUTHERN
PACIFIC TRANSPORTATION COMPANY, ST. LOUIS
SOUTHWESTERN RAILWAY COMPANY, SPCSL CORP. AND THE
DENVER AND RIO GRANDE WESTERN RAILROAD COMPANY

HIGHLY CONFIDENTIAL

Washington, D.C.

Thursday, May 9, 1996

Deposition of NEAL D. OWEN, a witness
herein, called for examination by counsel for the
Parties in the above-entitled matter, pursuant to
agreement, the witness being duly sworn by ANN L.
BLAZEJEWSKI, CM, a Notary Public in and for the
District of Columbia, taken at the offices of
Mayer, Brown & Platt, 2000 Pennsylvania Avenue,
N.W., Washington, D.C., 20006-1882, at
11:15 a.m., Thursday, May 9, 1996, and the
proceedings being taken down by Stenotype by
ANN L. BLAZEJEWSKI, CM, and transcribed under her
direction.

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1 commence the implementation process?

2 A. I have no information in that regard.

3 Q. You have not talked to anybody on the
4 team?

5 A. Yes, I have talked to people on the
6 team since it was commissioned. Mr. Clifton,
7 specifically, several times.

8 Q. In your deposition of February 23rd you
9 describe the operating description and contrasted
10 it to a formal operating plan that might be
11 submitted to the ICC, then ICC. Have you had
12 occasion to update whatever it is you call your
13 operating predictions?

14 A. Yes.

15 Q. Were they provided in your work papers?

16 A. The updating was done just in
17 conjunction with the time that had passed since
18 the description was filed in December, and
19 particularly in conjunction with the CMA
20 agreement. All events that I reviewed and
21 circumstances that I reviewed confirmed what I
22 had said in December and that there's no need to
23 change anything that was said in December.

24 Q. Well, have you updated your
25 description?

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1 A. There's no need to provide a written
2 update in that the review disclosed there was no
3 change really in the December description.

4 Q. So you stick with the description that
5 you made in December of 1995?

6 A. That's correct. There have been some
7 very minor modification in the implementation
8 process, which I agree with, but they have been
9 very minor, and the description as of December is
10 still valid.

11 Q. And the CMA agreement did not change
12 that description?

13 A. The CMA agreement did not change the
14 train frequencies and the elements that were
15 contained in the December description, so the
16 train frequencies, in my opinion, were still
17 valid, the crew change points, the locations
18 where traffic could be switched were all still
19 valid. To the extent that there has been any
20 information developed since that time that
21 allowed me to expand on the December 29th
22 statement, it's in my current statement or in
23 Mr. Clifton's statement.

24 Q. On page 24 of your statement in the
25 second paragraph you discuss BN/Santa Fe's

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BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD
COMPANY AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN
PACIFIC TRANSPORTATION COMPANY, ST. LOUIS
SOUTHWESTERN RAILWAY COMPANY, SPCSL CORP. AND THE
DENVER AND RIO GRANDE WESTERN RAILROAD COMPANY

-- HIGHLY CONFIDENTIAL --

Washington, D.C.

Friday, May 17, 1996

Deposition of MICHAEL D. ONGERTH, a
witness herein, called for examination by counsel
for the Parties in the above-entitled matter,
pursuant to agreement, the witness being duly
sworn by FERNITA R. FINKLEY, RPR, a Notary Public
in and for the District of Columbia, taken at the
offices of Harkins & Cunningham 1300 19th Street,
N.W., Washington, D.C., at 10:05 a.m., Friday,
May 17, 1996, and the proceedings being taken
down by Stenotype by FERNITA R. FINKLEY, RPR, and
transcribed under her direction.

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1 chain of title.

2 Q. Now, how do these environmental issues
3 come to light? Does one or the other party
4 involved in negotiations conduct an environmental
5 audit?

6 A. In the transactions which I have been
7 involved with, audits are rare unless you are
8 working with a -- certainly in the joint facility
9 sense, become much more common in a spin-off or
10 sale transaction which, by the way, may very well
11 involve grant of trackage rights.

12 But in the context used here,
13 environmental investigations, what you'd call a
14 phase one or phase two assessment, are not
15 common. What is common is an agreement or a
16 failure to reach agreement, you either reach it
17 or you don't, where one party indemnifies the
18 other in some way which satisfies the other party
19 that he isn't unduly assuming unknown risks.

20 Q. You indicated that it comes up in
21 connection with line sales that may also involve
22 trackage rights. How would it come up in that
23 context?

24 A. I believe I've already stated in a
25 previous answer that it is very common in a sale

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1 transaction or a lease transaction in a strictly
2 trackage rights case where there's no sale or
3 lease but simply a grant of rights, it's much
4 less likely there.

5 What you really are dealing with is
6 agreement in your joint -- within your joint
7 facility contracts that deal with liability for
8 potential spills in the future, not past actions.

9 Q. In connection with the sale, however,
10 how does the environmental issue come to light?

11 MR. NORTON: Generalize about all such
12 transactions or --

13 MR. MOLM: He's had experience, I
14 presume, in that area. And this is not fishing.
15 It will all come together.

16 MR. NORTON: I'm trying to see what the
17 material issue of disputed fact that has any
18 relation to KCS in this context is, but I'll wait
19 a little longer, I guess.

20 THE WITNESS: Would you read back his
21 question, please.

22 THE REPORTER: "Question: In
23 connection with the sale, however, how does the
24 environmental issue come to light?"

25 BY MR. MOLM:

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1 could, but the common definition would be an SP
2 terminal would involve only SP access and only
3 direct SP switching, but there are exceptions.

4 There will be -- there may be joint
5 facilities within a terminal, there may be a
6 joint drill track, there may be an area within a
7 terminal complex -- I've introduced a new term
8 here, complex -- which involves more than one
9 railroad.

10 You may have an industrial area where
11 the responsibility for servicing local customers
12 is swapped back and forth between carriers on a
13 periodic basis which might be monthly. It might
14 be every six months. It might be every year. It
15 could be a period of years like three or five.
16 It might involve small joint facilities where one
17 railroad crosses the other and have no other
18 common trackage or it could have a series of
19 these other arrangements which I have just
20 previously described.

21 Q. Are you familiar with the term
22 operating plan?

23 MR. NORTON: In a particular context?

24 THE WITNESS: It can mean many things,
25 but I use the term myself, and there are

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1 operating plans such as the operating plan
2 prepared by Union Pacific and Southern Pacific in
3 this case which is a conceptual plan for purposes
4 of the application, then there are much more
5 detailed plans which you would call an
6 implementation plan.

7 Union Pacific and Southern Pacific are
8 not in a position to be formulating
9 implementation plans prior to Surface
10 Transportation Board approval. There are other
11 uses of the term, but I don't think they apply
12 here. I'll not go into those at this point.

13 BY MR. MOLM:

14 Q. Does an operating plan depend in part
15 on the number of trains?

16 A. That certainly is going to be one
17 element.

18 Q. And the priority given to different
19 trains?

20 A. That would certainly be an element.

21 Q. And the schedule of trains?

22 A. The plan would imply schedule, yes.

23 Q. And all of that is derived from what
24 the customer needs are; is that correct?

25 A. The industry is certainly moving in

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Page Count 37

May, 1996 # 117

UP/SP-252

BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY
COMPANY, SPCSL CORP. AND THE DENVER AND
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APPLICANTS' SUBMISSION OF SUPPLEMENTAL
ENVIRONMENTAL INFORMATION CONCERNING SETTLEMENT WITH CMA

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May 21, 1996



BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC
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COMPANY, SPCSL CORP. AND THE DENVER AND
RIO GRANDE WESTERN RAILROAD COMPANY

APPLICANTS' SUBMISSION OF SUPPLEMENTAL
ENVIRONMENTAL INFORMATION CONCERNING SETTLEMENT WITH CMA

Applicants submit herewith supplemental environmental information concerning Applicants' settlement with CMA.

The CMA settlement, which grants BN/Santa Fe trackage rights over additional UP and SP line segments between East St. Louis and Houston, will not result in abandonment of any line segments, require any additional construction or change projected activity at UP or SP freight yards. Because Applicants assumed that BN/Santa Fe would provide fully competitive service in competition with UP/SP between Houston and the St. Louis gateway as a result of the original BN/Santa Fe settlement, Applicants' projections of traffic levels as reflected in UP/SP-194 are not affected, except to a very minor extent, by the CMA settlement.

Attached is a report by Applicants' environmental consultants, which evaluates the environmental effects on UP/SP rail line segments should BN/Santa Fe elect to make maximum use of the new trackage rights. For purposes of this

report, Applicants and their consultants assumed that BN/Santa Fe would operate all trains between Houston and Memphis or St. Louis on a directional basis with the flow of UP/SP trains in the same corridor and that BN/Santa Fe would operate trains between Houston and the St. Louis area on UP/SP lines, rather than using its own line along the Mississippi River.

Respectfully submitted,

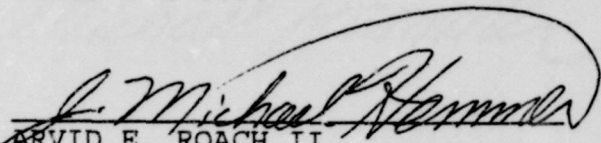
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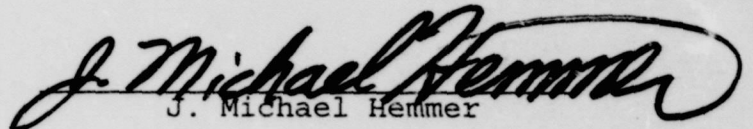
May 21, 1996

CERTIFICATE OF SERVICE

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J. Michael Hemmer

**SUPPLEMENTAL REPORT
RAIL LINE SEGMENTS
UNION PACIFIC/SOUTHERN PACIFIC
MERGER**

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May 20, 1996

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1.0 INTRODUCTION

1.1 OVERVIEW OF THE PROPOSED MERGER

This document supplements the six-part Environmental Report (ER) (dated November 30, 1995) prepared in connection with the Railroad Merger Application submitted to the Interstate Commerce Commission (ICC) in Finance Docket No. 32760, Union Pacific Railroad Company and Missouri Pacific Railroad Company - Control and Merger - Southern Pacific Rail Corporation, Southern Pacific Transportation Company, St. Louis Southwestern Railway Company, SPCSL Corp., and The Denver and Rio Grande Western Railroad Company¹ and the related PDEA filed on March 29, 1996.

1.2 OVERVIEW OF THE SUPPLEMENTAL REPORT

This report analyzes potential environmental impacts on rail line segments in the UP/SP system that might result from Applicants' agreement with the Chemical Manufacturers Association (CMA). Applicants do not expect UP/SP's rail traffic levels or overall rail traffic levels to change, except to a very minor extent, as a result of the CMA agreement. However, BN/Santa Fe may decide to use the trackage rights provided by the CMA agreement to reroute some of its traffic to UP/SP trackage. Based on Applicants' assumptions as to the traffic changes that would result if BN/Santa Fe made maximum use of the trackage rights provided by the CMA agreement, there are three rail line segments on the UP/SP system which might experience increased train traffic as a result of the CMA agreement and two segments that might experience decreased train traffic. All five segments were previously identified and analyzed for air quality and noise impacts in Part 2 of the ER and/or in the PDEA filed March 29, 1996. These line segments are analyzed in this report, and are listed in Table 1-1 and shown on Figure 1-1. Those segments that exceed the STB threshold for noise study are summarized in Table 1-2.

The rail line segments are generally described in Section 2.0. The air quality and noise effects of increased operations on the affected rail line segments are described in Section 3.0. Suggested mitigation actions are described in Section 4.0.

Appendix A presents a list of acronyms and abbreviations, as well as a glossary.

The Surface Transportation Board ("STB") succeeded to the functions of the ICC on January 1, 1996.

1.3 POTENTIAL IMPACT AREAS AND METHODOLOGIES

This report summarizes the types of potential environmental impacts associated with changes in traffic activity on the rail line segments referred to above. These impacts pertain to air quality, noise, and safety. Increases in rail traffic are not expected to cause physical disturbances to land use, water, historical, archeological or biological resources and, accordingly, these issues are not addressed.

The methodologies used for this Supplemental Report were similar to those previously described in Part 6 of the ER.

1.3.1 Air Quality Impacts

Air quality impacts are defined as the increase or decrease in emissions from a source to the ambient air. The source evaluated for rail segment traffic changes is diesel locomotive engine emissions. Diesel locomotives are a mobile rather than a stationary source of emissions. The U.S. Environmental Protection Agency (USEPA) has developed National Ambient Air Quality Standards (NAAQS) for the following six criteria pollutants to protect human health and welfare:

- | | |
|--------------------------------------|---|
| •Sulfur Dioxide (SO ₂) | •Carbon Monoxide (CO) |
| •Nitrogen Dioxide (NO ₂) | •Lead (Pb) |
| •Ozone (O ₃) | •Particulate Matter (TSP and PM ₁₀) |

Table 3-3 shows air emissions in hydrocarbons (HC), carbon monoxide (CO), nitrogen oxides (NO_x), Sulfur Dioxide (SO₂), and Particulate Matter (PM). Ozone (O₃) is formed during complex photochemical reactions between nitrogen oxides (NO_x) and volatile hydrocarbons (HC) in the presence of sunlight. Lead (Pb) is present in trace quantities in fuel oils. However, for purposes of this study, the magnitude of lead emissions associated with diesel fuel combustion is not anticipated to be significant and therefore, is not shown in the table.

Contiguous areas of the country having similar topography and air quality management needs are grouped into Air Quality Control Regions (AQCRs). The ambient air quality concentrations in a given AQCR may exceed these NAAQS, making the AQCR a nonattainment area. If pollutant concentrations are less than the standards, the AQCR is referred to as an attainment area. Part 6 of the ER presents the attainment status of the AQCRs in all states affected by the proposed UP/SP merger. Air quality impacts associated with the proposed merger were evaluated for each affected AQCR. In some cases, a rail line segment crosses more than

one AQCR. For purposes of this analysis, a conservative approach was taken; if a portion of an AQCR is designated as nonattainment for one or more pollutants, the entire AQCR is assumed to be nonattainment.

Some areas of the country, such as National Parks and National Wildlife Areas, are further designated as Prevention of Significant Deterioration (PSD) Class I air quality areas. There are no rail line segments in PSD Class I areas which will experience increases exceeding STB thresholds.

The threshold values which determine whether the impact to ambient air quality adjacent to a rail segment must be assessed are specified in 49 CFR 1105.7(e)(5) and summarized below.

STB AIR QUALITY THRESHOLDS FOR IMPACT ANALYSIS

ACTIVITY	THRESHOLD
Attainment Areas [49 CFR 1105.7(e)(5)(i)]	
Rail line segment	Increase of 8 trains/day or 100% as measured in gross-ton miles annually
Nonattainment Areas or PSD Class I Areas [49 CFR 1105.7(e)(5)(ii)]	
Rail line segment	Increase of 3 trains/day or 50% as measured in gross-ton miles annually

1.3.2 Noise

The STB regulations require the performance of noise studies for all rail line segments on which traffic will increase by at least 100% as measured by gross ton miles annually or at least eight trains per day. Noise-sensitive land uses where the weighted 24-hour sound exposure level L_{dn} will increase by 3 decibels (dBA) or will meet or exceed 65 dBA are required to be identified. Methodologies used to evaluate noise impacts along rail line segments were previously discussed in Part 6 of the ER. For this study, any increase in L_{dn} less than 2 dBA was considered insignificant, and only segments where the projected change in traffic would cause at least a 2 dBA increase in L_{dn} were evaluated.

Details of the approach used to identify noise impacts on the above-threshold segments and the models used to project noise exposure were previously presented in Part 6 of the ER. Following is a summary of the steps taken:

1. Noise-sensitive land uses near line segments were identified. When possible, the towns that the rail segments pass through were visited to inventory the noise-sensitive land uses. For towns that were not visited, land use along the line was analyzed on the basis of USGS 7.5-minute quad maps. In some locations it is unclear from the USGS maps whether land use is residential or commercial/industrial. In most cases, residential land use was assumed, to ensure that potential noise impacts are not overlooked.
2. L_{dn} 65 contours were drawn on the USGS maps for each community. For the noise projections, the average train was assumed to be pulled by 3.5 locomotives, 5,000 feet long, and traveling at 50 mph. It was assumed that train horns are sounded starting $\frac{1}{4}$ mile before all grade crossings and continuing until the locomotive is through the grade crossing. Where, based on either a site visit or information on USGS maps, buildings along the tracks act as acoustical shielding for buildings farther from the tracks, an assumption, based on available data was made. It was assumed that the acoustical shielding reduces levels of train noise by 5 dBA. This is an important assumption since acoustical shielding by buildings can greatly reduce the extent of noise impacts.
3. Approximate counts were made of the number of residences, schools, nursing homes and libraries and churches within the L_{dn} 65 contour for both the pre-merger and post-merger train volumes.

Table 1-2 summarizes the two line segments that exceed the STB threshold for a noise study and reevaluates one segment previously analyzed in the PDEA. Also shown in Table 1-2 are the total number of trains using the line segment for the pre- and post-merger cases, the estimated sound exposure increase caused by the increase in train traffic, and whether the increase is greater than 2 dBA requiring tabulation of the noise impacts. With the information available, it was not feasible to estimate the number of noise-sensitive land uses where L_{dn} will increase by 3 dBA in addition to counting the number where L_{dn} will exceed 65 dBA.

In addition, for two segments (Paragould to Fair Oaks and Fair Oaks to Brinkley, previously analyzed in Part 2 of the ER), a simplified approach has been used. On site counts of noise sensitive receivers for these two rail line segments developed by SEA's third party consultant² using standard noise measurement methodology and train counts shown in the ER were adjusted to reflect the revised post-merger train volumes based on the assumptions stated in Section 1.2 hereof. This simplified methodology was used to generate a representative estimate of the noise-sensitive receivers within the post-merger L_{dn} 65 contours. The procedure used to estimate the increase in the number of residences within the L_{dn} 65 contour based on the previous estimates was:

1. The distances to the L_{dn} contours were estimated for post-merger train volumes using the train noise model described in Part 6 of the ER.
2. The projected post-merger increase in the number of residences within the L_{dn} contour was scaled up using the ratio of the increase in the impact distances.

Since the change in distances to the L_{dn} 65 contours is less than 50 feet near grade crossings and less than 10 feet away from grade crossings, this procedure will give a reasonably accurate estimate of the increase in the number of residences inside the L_{dn} 65 contour in areas where population density is relatively uniform. Numerical values used to adjust the third-party consultant projections are shown in Table 1-3.

For both segments that trip the STB threshold for a noise study, the modified train projections are one train per day greater than those used in the ER. This increase in train volume will increase the distance to the L_{dn} 65 contour by only 3 to 4 percent.

² SEA's on-site counts of noise sensitive receivers replace estimates of noise sensitive receivers for these two rail line segments shown in the ER, and are reflected in Tables 3-1 and 3-2.

1.3.3 Safety

Public safety considerations related to rail line traffic increases include accidents at highway grade crossings, spills and releases of hazardous materials.

The proposed merger, including the settlement with BN/Santa Fe and the agreement with CMA, will result in a rerouting of train traffic within the consolidated system, generating increased train traffic densities on some line segments and decreases on other segments. On a particular rail line, the number of accidents/incidents related to train/vehicle collisions is statistically likely to vary in relation to rail and vehicle traffic volumes as well as with the number of grade crossings.

TABLE 1-1

**SUMMARY OF RAIL LINE SEGMENTS
MEETING STB EVALUATION THRESHOLDS**

RAIL SEGMENT		LENGTH (MILES)	TRAINS PER DAY*			PERCENT CHANGE IN GROSS TON-MILES PER YEAR
ORIGIN	DESTINATION TO		PRE MERGER	POST MERGER	CHANGE IN TRAINS PER DAY	
DEXTER JUNCTION, MO	PARAGOULD, AR	69	16.0	23.3	7.3	49
PARAGOULD, AR	FAIR OAKS, AR	69	11.4	20.7	9.3	77
FAIR OAKS, AR	BRINKLEY, AR	26	11.4	22.7	11.3	106
**BRINKLEY, AR	PINE BLUFF, AR	71	22.6	29.6	7.0	71
**SHREVEPORT, LA	LUFKIN, TX	116	8.3	9.8	1.5	-26

Notes:

* Includes BN/Santa Fe trains.

** These rail segments (Brinkley to Pine Bluff and Shreveport to Lufkin) exceeded the STB thresholds in previous analyses but would not exceed the thresholds using Applicants' assumptions as to traffic changes that would occur if BN/Santa Fe made maximum use of the trackage rights provided by the CMA agreement. These segments are discussed in detail in Sections 3.4 and 3.5 of this report, respectively.

TABLE 1-2
RAIL SEGMENTS EXCEEDING STB TRAFFIC THRESHOLDS
FOR NOISE ASSESSMENT

RAIL SEGMENT		LENGTH (MILES)	TRAINS PER DAY*			dB** INCREASE	NOISE IMPACT ASSESSMENT
ORIGIN	DESTINATION TO		PRE MERGER	POST MERGER	CHANGE IN TRAINS PER DAY		
PARAGOULD, AR	FAIR OAKS, AR	69	11.4	20.7	9.3	2.6	Yes
FAIR OAKS, AR	BRINKLEY, AR	26	11.4	22.7	11.3	3.0	Yes
***BRINKLEY, AR	PINE BLUFF, AR	71	22.6	29.6	7.0	1.2	No

Notes:

- * Includes BN/Santa Fe trains.
- ** dB sound exposure increases in decibels. Only segments with a minimum of 2 dBA sound exposure increases were evaluated for noise impacts.
- *** This rail segment (Brinkley to Pine Bluff) exceeded the STB thresholds in previous analyses but would not exceed the thresholds using Applicants' assumptions as to traffic changes that would occur if BN/Santa Fe made maximum use of the trackage rights provided by the CMA agreement. This segment is discussed in detail in Section 3.4 of this report.

TABLE 1-3
NOISE ASSESSMENT PROJECTIONS

SEGMENT	TRAIN VOLUME (trains per day)*						
	VALUES FROM APPLICANTS' ENVIRONMENTAL REPORT				MODIFIED VALUES		
	Exist	Future	Increase		Future	Increase	
			Trains	dB		Trains	dB
Paragould, AR to Fair Oaks, AR	11.4	19.7	8.3	2.4	20.7	9.3	2.6
Fair Oaks, AR to Brinkley, AR	11.4	21.7	10.3	2.8	22.7	11.3	3.0
**Brinkley, AR to Pine Bluff, AR	22.6	31.6	9.0	1.5	29.6	7.0	1.2

Notes:

* Includes BN/Santa Fe trains.

** This rail segment exceeded the STB thresholds in previous analyses but would not exceed the thresholds using Applicants' assumptions as to traffic changes that would occur if BN/Santa Fe made maximum use of the trackage rights provided by the CMA agreement. This segment is discussed in detail in Section 3.4 of this report.

2.0 RAIL LINE SEGMENTS

Rail line segment traffic increases proposed as part of the UP/SP merger, including Applicants' estimates of BN/Santa Fe trains operating on the UP/SP system as a result of the settlement, were described in detail in Part 2 of the ER. The three rail line segment traffic increases and two rail line segment decreases addressed in this report reflect estimates of the trains BN/Santa Fe would operate on the UP/SP system if it made maximum use of the trackage rights provided by the CMA agreement, combined with prior estimates of Applicants' and BN/Santa Fe's traffic on the UP/SP system. Air quality and noise impacts related to the individual rail line segments are described in Section 3.0.

3.0 IMPACTS TO RAIL LINE SEGMENTS

The following text summarizes the emission increases for the five rail line segments identified in this report. The projections for post-merger train traffic in this section are based on Applicants' estimate of Applicants' trains on the line segments after the merger, plus BN/Santa Fe's estimates of its trains on the segments after the merger as a result of the BN/Santa Fe settlement agreement, and Applicants' estimates of traffic changes that would occur if BN/Santa Fe made maximum use of the trackage rights provided by the CMA settlement agreement.

Table 3-3 summarizes the estimated emission increases generated by each of these rail line segments and indicates the AQCR. Some of the rail line segments analyzed affect more than one AQCR; also, a given AQCR may be impacted by several segments. The emissions increases in each AQCR shown on Table 3-3 are attributable solely to the increases on the rail lines. Table 3-3 does not attempt to show the merger's overall effect on emissions within the AQCRs because it does not take into account appropriate offsets from abandonments, diversions from other rail lines, and truck diversions.

The results of the noise impact assessment are summarized in Table 3-4, which shows the number of noise impacts for the pre- and post-merger train volumes. Table 3-4 shows the number of noise-sensitive receptors exposed to noise levels exceeding L_{dn} 65. At most of these receptors, the increase in noise exposure will be between 2 and 3 dBA. The increase in noise exposure will be solely due to more trains operating on the tracks; no change is expected in the noise emission on individual trains.

A large majority of the noise impact is due to train horns being sounded starting ¼ mile prior to grade crossings. The train horns are much louder than the trains, which means that for ¼ mile either side of a grade crossing the horns are the dominant rail noise source. In a number of the small towns that the trains pass through there are a sufficient number of grade crossings that the train horns should be sounded virtually continuously as the trains pass through the community.

3.1 DEXTER JUNCTION, MISSOURI TO PARAGOULD, ARKANSAS

3.1.1 Air Quality Analysis

This rail segment (refer to Figure 3-1) will experience an increase of 7.3 trains per day (previously shown in Part 2 of the ER as 6.3 trains per day). It crosses two states and two AQCRs (20 and 138). AQCR 20 is designated as attainment for all criteria pollutants. AQCR 138 is designated as attainment for all criteria pollutants except PM and lead. The revised projected increases in pollutant emissions on this rail segment are estimated in tons per year, as follows: HC 16.81, CO 52.27, NO_x 391.25, SO₂ 28.35, and PM 8.48.

3.1.2 Noise

The projected increase in train volume on this segment does not meet the STB analysis threshold for noise.

3.2 PARAGOULD, ARKANSAS TO FAIR OAKS, ARKANSAS

3.2.1 Air Quality Analysis

This rail segment (refer to Figure 3-1) will experience an increase of 9.3 trains per day (previously shown in Part 2 of the ER as 8.3 trains per day). It crosses one state and one AQCR (20). AQCR 20 is designated as attainment for all criteria pollutants. The revised projected increases in pollutant emissions on this rail segment are estimated in tons per year, as follows: HC 19.42, CO 60.39, NO_x 452.01, SO₂ 32.75, and PM 9.80.

3.2.2 Noise

This rail segment currently has an average of 11.4 trains per day and is expected to experience an increase of 9.3 trains per day and an increase of 77 percent in gross ton-miles per year as a result of the proposed merger. The change in train volume would result in an Ldn increase of 2.6 dB. Train horns sounded before grade crossings are the dominant noise source in most of this corridor. It is projected that, with the existing train traffic, there are 857 residences, one school, and 14 churches along this segment exposed to noise levels exceeding Ldn 65 dBA. With the projected increase in train traffic, the noise-sensitive land uses within the Ldn 65 contour are projected to include 1,178 residences, 2 schools, and 18 churches.

TABLE 3-1

**NOISE SUMMARY
PARAGOULD, ARKANSAS TO FAIR OAKS, ARKANSAS**

COMMUNITY	NUMBER OF SENSITIVE RECEPTORS					
	PRE-MERGER			POST-MERGER		
	RESIDENCE	SCHOOL	CHURCH	RESIDENCE	SCHOOL	CHURCH
Paragould, AR	284	1	2	402	1	3
Bethel, AR	8	0	1	9	0	1
Brookland, AR	75	0	2	104	0	2
Jonesboro Jct., AR	4	0	0	4	0	0
Jonesboro, AR	168	0	2	232	0	4
Otwell, AR	11	0	0	19	0	0
Weiner, AR	10	0	0	30	0	1
Waldenburg, AR	10	0	1	13	0	1
Fisher, AR	109	0	3	148	0	3
Prittinger, AR	14	0	0	19	0	0
Hickory Ridge, AR	150	0	2	182	1	2
Tilton, AR	8	0	0	8	0	0
Fair Oaks (North), AR	6	0	1	8	0	1
TOTAL	857	1	14	1178	2	18

3.3 FAIR OAKS, ARKANSAS TO BRINKLEY, ARKANSAS

3.3.1 Air Quality Analysis

This rail segment (refer to Figure 3-1) will experience an increase of 11.3 trains per day (previously shown in Part 2 of the ER as 10.3 trains per day). It crosses one state and one AQCR (20). AQCR 20 is designated as attainment for all criteria pollutants. The revised projected increases in pollutant emissions on this rail segment are estimated in tons per year, as follows: HC 10.02, CO 31.16, NO_x 233.28, SO₂ 16.90, and PM 5.06.

3.3.2 Noise

This rail segment currently has an average of 11.4 trains per day and is expected to experience an increase of 11.3 trains per day and an increase of 106 percent in gross ton-miles per year as a result of the proposed merger. The change in train volume would result in an Ldn increase of 3.0 dB. Train horns sounded before grade crossings are the dominant noise source in most of this corridor. It is projected, that with the existing train traffic, there are 158 residences and 6 churches along this segment

exposed to noise levels exceeding Ldn 65 dBA. With the projected increase in train traffic, the noise sensitive land uses within the Ldn 65 contour are projected to include 223 residences and 8 churches.

TABLE 3-2

**NOISE SUMMARY
FAIR OAKS, ARKANSAS TO BRINKLEY, ARKANSAS**

COMMUNITY	NUMBER OF SENSITIVE RECEPTORS					
	PRE-MERGER			POST-MERGER		
	RESIDENCE	SCHOOL	CHURCH	RESIDENCE	SCHOOL	CHURCH
Fair Oaks (South), AR	9	0	1	13	0	1
Hillemann, AR	11	0	0	19	0	0
Hunter, AR	53	0	1	78	0	1
Zent, AR	5	0	0	8	0	0
Fargo, AR	4	0	0	4	0	0
Brinkley, AR	76	0	4	101	0	6
TOTAL	158	0	6	223	0	8

3.4 BRINKLEY, ARKANSAS TO PINE BLUFF, ARKANSAS

This rail segment exceeded STB thresholds in previous analyses, but would not exceed the thresholds based on the assumptions described above concerning the CMA agreement. Therefore, an additional analysis for air quality and noise impacts was conducted and is presented below.

3.4.1 Air Quality Analysis

This rail segment (refer to Figure 3-1) will experience an increase of 7.0 trains per day (previously shown in the PDEA as 9.0 trains per day). It crosses one state and two AQCRs (16 and 20) which are designated as attainment for all criteria pollutants. The revised projected increases in pollutant emissions on this rail segment are estimated in tons per year, as follows: HC 22.25, CO 69.17, NO_x 517.78, SO₂ 37.52, and PM 11.23. These increases in emissions (change in emissions from pre- to post merger) are less than the increases (change in emissions from pre- to post merger) presented in Table 3-5 of the PDEA, due to the projected reduction in train traffic. These absolute reductions can be quantified in tons per year as follows: HC 6.56, CO 20.42, NO_x 152.82, SO₂ 11.07, and PM 3.31.

3.4.2 Noise

This rail segment will experience an increase of 7.0 trains per day (previously shown in the PDEA as 9.0 trains per day). The increase in train volume would cause a 1.2 dBA increase in the noise exposure (previously shown in the PDEA as 1.5 dBA increase in the noise exposure), which is below the 2 dBA threshold for a detailed noise assessment.

3.5 SHREVEPORT, LOUISIANA TO LUFKIN, TEXAS

This rail segment exceeded STB thresholds for air quality in previous analyses, but would not exceed the thresholds based on the assumptions described above concerning the CMA agreement. Therefore, an additional analysis for air quality was conducted and is presented below.

3.5.1 Air Quality Analysis

This rail segment (refer to Figure 3-1) will experience an increase of 1.5 trains per day (previously shown in the PDEA as 3.5 trains per day). It crosses two states and two AQCRs (22 and 106). AQCR 22 is designated as attainment for all criteria pollutants. AQCR 106 is designated as attainment for all criteria pollutants except ozone. The revised projected change in pollutant emissions on this rail segment are estimated in tons per year, as follows: HC -8.86, CO -27.54, NO_x -206.17, SO₂ -14.94, and PM -4.47. These changes in emissions (change in emissions from pre- to post merger) are less than the increases (change in emissions from pre- to post merger) presented in Table 3-5 of the PDEA due to the projected reduction in train traffic. These absolute reductions can be quantified in tons per year as follows: HC 9.75, CO 30.32, NO_x 226.98, SO₂ 16.45, and PM 4.87.

3.5.2 Noise

The projected increase in train volume on this segment does not meet the STB analysis threshold for noise.

TABLE 3-3

SUMMARY OF RAIL LINE SEGMENT EMISSION CHANGES

SEGMENT ORIGIN	SEGMENT DESTINATION	AFFECTED AQCR	ATTAINMENT STATUS	TRAINS PER DAY CHANGE	GROSS TONS PER YEAR CHANGE	CRITERIA POLLUTANT EMISSIONS IN TONS PER YEAR				
						HC	CO	No _x	SO ₂	PM
DEXTER JUNCTION, MO	PARAGOULD, AR			7.3	13.91	16.81	52.27	391.25	28.35	8.48
		138	NA			7.90	24.57	183.89	13.32	3.99
		20	A			8.91	27.70	207.36	15.03	4.49
PARAGOULD, AR	FAIR OAKS, AR	20	A	9.3	16.07	19.42	60.39	452.01	32.75	9.80
FAIR OAKS, AR	BRINKLEY, AR	20	A	11.3	22.01	10.02	31.16	233.28	16.90	5.06
BRINKLEY, AR	PINE BLUFF, AR			7.0	17.89	22.25	69.17	517.78	37.52	11.23
		20	A			14.24	44.27	331.38	24.01	7.19
		16	A			8.01	24.90	186.40	13.51	4.04
SHREVEPORT, LA	LUFKIN, TX			1.5	-4.36	-8.86	-27.54	-206.17	-14.94	-4.47
		22	A			-3.19	-9.91	-74.22	-5.38	-1.61
		106	NA			-5.67	-17.63	-131.95	-9.56	-2.86

Notes:

Emission Factors (lb/1,000 gallons diesel fuel consumed):

Pollutant	Emission Factor
HC	22
CO	68.4
No _x	512
SO ₂	37.1
PM	11.1

Emission Factors adapted from "Locomotive Emission Study," Booz, Allen, & Hamilton, January 1991.

Fuel efficiency factor = 628 (gross-ton miles/gallon)

TABLE 3-4

NOISE IMPACT ASSESSMENT FOR RAIL LINE SEGMENTS

RAIL SEGMENT		LENGTH (MILES)	NOISE-SENSITIVE RECEPTORS		
ORIGIN	DESTINATION TO		PRE MERGER	POST MERGER	INCREASE
PARAGOULD, AR	FAIR OAKS, AR	69	872	1198	326
FAIR OAKS, AR	BRINKLEY, AR	26	164	231	67
BRINKLEY, AR	PINE BLUFF, AR	71	**	**	**

Notes:

- * L_{dn} exceeds 65 dBA at noise-sensitive receptors (residences, schools and churches).
- ** Less than a 2 dBA increase in noise exposure.

4.0 MITIGATION

4.1 AIR QUALITY

The air emissions which have been calculated for each of the AQCRs from increases in train activity are from diesel locomotives operating on these line segments. Calculations were made on the basis of a 1991 study which calculated emission factors for pounds of HC, CO, NO_x, SO₂ and PM per 1000 gallons of diesel fuel consumed. These factors will change as improvements in locomotive fuel efficiency and controls are implemented. Changes in emission regulations, under the Clean Air Act currently under consideration, if implemented, will require significant reductions in emission factors for some criteria pollutants, most notably NO_x. UP/SP continues to study ways to reduce emissions and intends to work with all appropriate agencies as well as locomotive builders to reduce air emissions from locomotives.

4.2 NOISE

It is important to recognize that the increase in noise impacts along the evaluated segments are spread out over hundreds of miles of track and that they will be, in some circumstances, partially counterbalanced by decreases in noise impact on lines that will be abandoned or will see a decrease in train traffic. The majority of noise impacts are in neighborhoods within 1/4 mile of grade crossings. For the noise analysis it was assumed that all trains sound their horns for the full 1/4 mile before all grade crossings. This may not be the case at all crossings, however, since local or state requirements may prohibit train whistles. Recent research by the Federal Railroad Administration has shown that the accident rate is higher at grade crossings where warning horns are not sounded.

Any effort to mitigate the principal noise impacts from train operations must focus on the noise from the train horns. In most cases, the elimination of train whistles or reduction in decibel levels could create safety concerns for vehicular or pedestrian traffic.

5.0 REFERENCES

5.1 AIR QUALITY

5.1.1 References

40 CFR Part 81, Designation of Areas for Air Quality Planning Purposes, Appendix A to Part 81.

40 CFR Part 81, Designation of Areas for Air Quality Planning Purposes, Sub Part C Section 107, Attainment Status Designation.

40 CFR Part 52, Approval and Promulgation of Implementation Plans.

40 CFR Part 70, State Operating Permit Programs.

40 CFR Part 1105, Procedures for Implementation of Environmental Laws.

Booz, Allen, & Hamilton, Inc., 1991 Locomotive Emission Study (Emission Factors for Locomotives), Provided by the Santa Fe Railway Company.

Booz, Allen, & Hamilton, Inc., 1991. "Locomotive Emission Study," California Air Resources Board.

EPA Mobile Emissions Factors for 1995 (Heavy Duty Trucks), Provided by the Santa Fe Railway Company.

National Emissions Report, 1985. National Emissions Data System of the Aerometric and Emissions Reporting System, EPA, Research Triangle Park, North Carolina, September 1988.

Union Pacific Railroad Company, 1995 and 1996. Data for rail line segments base case and post-merger scenarios.

United States Environmental Protection Agency, 1995. "Compilation of Air Pollution Emission Factors," Volume 2, January 1995.

United States Environmental Protection Agency, 1985. "Compilation of Air Pollution Emission Factors," Volume 2, January 1985.

5.2 NOISE

5.2.1 References

Union Pacific Railroad Company, 1995 and 1996. Data for rail line segments base case and post-merger scenarios.

APPENDIX A

LIST OF ACRONYMS AND ABBREVIATIONS

10 log	Log base 10
A	Attainment
ADT	Average daily traffic
AHPP	Arkansas Historic Preservation Program
AQCR(s)	Air Quality Control Region(s)
BMPs	Best Management Practices
BN	Burlington Northern Railroad Company
BN/Santa Fe	The new railroad system created by the merger of the holding companies of BN and Santa Fe
CBC	Cannot be classified
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
CI	Construction at Intermodal Facility
CO	Carbon Monoxide
COE	United States Army Corps of Engineers
COFC	Container on flatcar
CPC	Common Point Connection
CT	Construction at Rail Yard
CTC	Centralized Traffic Control
CU	Corridor Upgrade
db	Decibel
dBA	Decibels (of sound) A range

DNL	Day-night equivalent level
DOT	United States Department of Transportation
DRGW	The Denver and Rio Grande Western Railroad Company
DTSC	Department of Toxic Substances Control
EPA	Environmental Protection Agency
ER	Environmental Report
ERNS	Emergency Response Notification System
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Maps
FRA	Federal Railroad Administration
HC	Hydrocarbons (in air)
HMMH	Harris, Miller, Miller & Hanson, Inc.
ICC	Interstate Commerce Commission
IHPA	Illinois Historic Preservation Agency
KSHS	Kansas State Historical Society
L_{dn}	Day-night equivalent sound level
L_{max}	Maximum sound level during train passby, dBA
LUST	State Inventory of Leaking Underground Storage Tanks
NA	Non-attainment
NAAQS	National Ambient Air Quality Standards
NAP	Portion of AQCR designated as non-attainment
NHPA	National Historic Preservation Act of 1966
NO_2	Nitrogen dioxide

NO_x	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NS	Not Significant
NWI	National Wetlands Inventory
O₃	Ozone
OBS	Office of Biological Services/United States Fish and Wildlife Service
OSHA	Occupational Safety and Health Administration
PM₁₀	Particulate Matter (under 10 microns in diameter)
POTO	Power Operated Turnout
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
ROW	Right of Way
SCS	Soil Conservation Service (currently named Natural Resources Conservation Service, Division of United States Department of Agriculture)
SEL	Source sound exposure level at 100 feet, dBA
SHPO	State Historic Preservation Office
SO₂	Sulfur dioxide
SP	Southern Pacific Rail Corporation, includes SPT, SSW, SPCSL and DRGW
SPL	State Priority List
STATSGO	State Soil Geographic Database
SWLF	State Inventory of Solid Waste Facilities

TOFC	Trailer on flat car
TSD	Treatment, Storage, or Disposal sites
TSP	Total Suspended Particulates
U	Unclassifiable
UP	UPRR, MPRR, and CNW
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VISTA	VISTA Environmental Information, Inc.

GLOSSARY

borrow material	Earthen material used to fill depressions to create a level right-of-way.
construction footprint	The area at a construction site subject to both permanent and temporary disturbances by equipment and personnel.
criteria pollutant	Any of six substances (i.e., lead, carbon dioxide, sulfur dioxide, nitrogen dioxide, ozone and particulate matter) regulated under the Clean Air Act, for which areas must meet national air quality standards.
dBA	Adjusted decibel level. A sound measurement that adjusts noise by filtering out certain frequencies to make it analogous to that perceived by the human ear.
decibel	A logarithmic scale that comprises over one million sound pressures audible to the human ear over a range from 0 to 140, where 0 decibels represents a reference sound level necessary for a minimum sensation of hearing and 140 decibels represents the level at which pain occurs.
endangered	A species that is in danger of extinction throughout all or a significant portion of its range and is protected by state and/or federal laws.
fill	The term used by the United States Army Corps of Engineers that refers to the placement of suitable materials (e.g., soils, aggregates, formed concrete structures, sidecast material, etc.) within water resources under Corps jurisdiction.
flat yard	A system of relatively level tracks within defined limits provided for making up trains, storing cars, and other purposes which requires a locomotive to move cars (switch cars) from one track to another.
Flood Insurance Rate Maps	Maps available from the Federal Emergency Management Agency that delimit the land surface area of 100-year and 500-year flooding events.
floodplain	The lowlands adjoining inland and coastal waters and relatively flat areas and flood prone areas of offshore islands including, at a minimum, that area inundated by a 1 percent (also known as a 100-year or Zone A floodplain) or greater chance of flood in any given year.
frog	A device used where two running rails intersect that provides flangeways to permit wheels and wheel flanges on either rail to cross the other.
habitat	The place(s) where plant or animal species generally occur(s) including specific vegetation types, geologic features, and hydrologic features. The continued survival of that species depends upon the intrinsic resources of

the habitat. Wildlife habitats are ~~often~~ further defined as places where species derive sustenance (foraging habitat) and reproduce (breeding habitat).

haulage right

The limited right of one railroad to operate trains over the designated lines of another railroad.

hump yard

A system of tracks within defined limits provided for making up trains, storing cars, and other purposes which utilizes an artificial hill or "hump" to use gravity to sort cars into classification tracks.

interlocker

An arrangement of switch, lock, and signal appliances interconnected so that their movements succeed each other in a predetermined order.

intermodal facility

A site or hub consisting of tracks, lifting equipment, paved areas, and a control point for the transfer (receiving, loading, unloading, and dispatching) of intermodal trailers and containers between rail and highway or rail and marine modes of transport.

intermodal train

A train consisting or partially consisting of highway trailers and containers or marine containers being transported for the rail portion of a multi-modal movement on a time-sensitive schedule. Also referred to as piggyback, TOFC (Trailer on Flat Car), COFC (Container on Flat Car), and double stacks (for containers only).

L_d

Level of noise (measured in decibels) averaged over the daytime period (0700-2200).

L_{dn}

Nighttime noise level (L_n) adjusted to account for the perception that a noise level at night is more bothersome than the same noise level would be during the day.

lift

A lift is defined as an intermodal trailer or container lifted onto or off of a rail car. For calculations, lifts were used to determine the number of trucks using intermodal facilities.

locomotive, road

One or more locomotives (or engines) designed to move trains between yards or other designated points.

locomotive, switching

Locomotive (or engine) used to switch cars in a yard, industrial, or other area where cars are sorted, spotted (placed at a shipper's facility), pulled (removed from a shipper's facility), and moved within a local area.

merchandise train

A train consisting of single and/or multiple car shipments of various commodities.

**National Wetlands
Inventory**

An inventory of wetland types in the United States compiled by the United States Fish and Wildlife Service.

nonattainment

An area that does not meet NAAQS specified under the Clean Air Act.

pick up

To add one or more cars to a train from an intermediate (non yard) track designated for the storage of cars.

rail spur

A track that diverges from a main line, also known as a spur track or rail siding, which typically serves one or more industries.

right-of-way

The right held by one person over another person's land for a specific use; rights of tenants are excluded. The strip of land for which permission has been granted to build and maintain a linear structure, such as a road, railroad, or pipeline.

set out

To remove one or more cars from a train at an intermediate (non yard) location such as a siding, interchange track, spur track, or other track designated for the storage of cars.

take

Loss of individuals of a plant or wildlife species and/or any direct or indirect action that results in mortality and/or injury. Further defined to include actions that disrupt normal patterns of wildlife species behavior; specifically those that reduce the survival and reproductive potential of an individual. Also refers to loss and/or degradation of species' habitat.

threatened

A species that is likely to become an endangered species within the foreseeable future throughout all or part of its range, and is protected by state and/or federal law.

trackage right

The right or combination of rights of one railroad to operate over the designated trackage of another railroad including, in some cases, the right to operate trains over the designated trackage, the right to interchange with all carriers at all junctions, and the right to build connections or additional tracks in order to access other shippers or carriers.

turnout

A track arrangement consisting of a switch and frog with connecting and operating parts, extending from the point of the switch to the frog, which enables engines and cars to pass from one track to another.

unit train

A train consisting of cars carrying a single commodity, e.g., a coal train.

water resources

All-inclusive term that refers to many types of permanent and seasonally wet/dry surface water features including springs, creeks, streams, rivers, pond, lakes, wetlands, canals, harbors, bays, sloughs, mudflats, and sewage-treatment and industrial waste ponds.

wetland

As defined by 40 CFR 230.3, wetlands are "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas.

wye

A principal track and two connecting tracks arranged like the letter "Y," on which locomotives, cars, and trains may be turned.

STB

FD

32760

5-3-96

83331

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Item No. _____

Page Count 13

May #17

83331

ON FOR COMPETITIVE RAIL TRANSPORTATION

MOBILIZATION OFFICE

1029 North Royal Street

Suite 400

Alexandria, Va. 22314

Office: (800) 814-3531

Fax: (800) 641-2255

May 3, 1996

Via Hand Delivery

Honorable Vernon A. Williams

Secretary

The Surface Transportation Board

1201 Constitution Avenue, N.W.

Washington, D.C. 20423



Re: Finance Docket No. 32760, *Union Pacific Corporation, Union Pacific Railroad Company and Missouri Pacific Railroad Company -- Control & Merger -- Southern Pacific Rail Corporation, Southern Pacific Transportation Company, St. Louis Southwestern Railway Company, SPCSL Corp. and the Denver and Rio Grande Western Railroad Company*

Dear Secretary Williams:

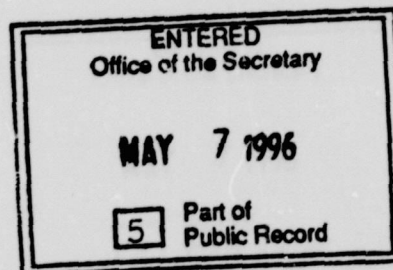
Enclosed for filing in the above-captioned case are an original and twenty copies of the Coalition for Competitive Rail Transportation's Request for Environmental Impact Statement identified as CCRT-10.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "John T. Estes".

John T. Estes

Executive Director





BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY
AND MISSOURI PACIFIC RAILROAD COMPANY
-- CONTROL AND MERGER --
SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY
COMPANY, SPCSL CORP. AND THE DENVER AND
RIO GRANDE WESTERN RAILROAD COMPANY

COALITION FOR COMPETITIVE RAIL TRANSPORTATION (CCRT)
REQUEST FOR ENVIRONMENTAL IMPACT STATEMENT

John T. Estes
Executive Director
Coalition for Competitive Rail Transportation
1029 North Royal Street, Suite 400
Alexandria, Va 22314
(800) 814-3531

May 3, 1996

ENTERED	
Office of the Secretary	
MAY 7 1996	
5	Part of Public Record

It is essential for the Surface Transportation Board (STB) to conduct an in depth and thorough environmental impact statement as part of its statutory evaluation of the proposed merger between the Union Pacific and Southern Pacific railroads (UPSP) or (Applicants). Such action is essential because:

- 1- This is the largest railroad merger in the history of the United States,
- 2- Thousands of cities and towns of all sizes will be affected,
- 3- Significant rail traffic will be rerouted resulting in new demands on both the existing transportation facilities and on emergency capabilities to cope with unforeseen accidental threats, hazardous spills and urban safety concerns,
- 4- There has been little or no evaluation of effective safety response capabilities on either a local or regional level,
- 5- Hundreds of miles of track is slated to be abandoned posing serious environmental degradation concerns,
- 6- Thousands of railroad employees will be laid off or reassigned posing serious training and safety related threats to both employees as well as the residents of the communities through which the affected railroads operate,
- 7- Currently approved municipal air and water pollution standards will be impacted as a result of an immense change in existing railroad traffic patterns which will in turn result in a cascade of additional changes in automotive and truck vehicular traffic pattern density levels, as sensitive surface transportation balances are altered,
- 8- Abandoned shippers must seek alternate transportation options placing new stress on the existing transportation infrastructure in numerous communities and regions of the country as well as resulting in potential land and water environmental damage to the vacated areas.
9. It is critical to a review of environmental considerations that the STB address the impact which result from the BNSF operations over the UP and SP tracks, and
10. It is respectfully submitted that it is the statutory responsibility of the STB in the public interest to address the cumulative environmental impact of the proposed merger as a whole (particularly where as here well over one half of the geographical area of the lower 48 states is involved) and not to merely target an analyses to separate geographical areas or regions.

These are the very types of concerns that the National Environmental Policy Act was designed to address and which the STB must carefully weigh. These environmental threats cannot be cavalierly examined nor can they be farmed out for other agencies to resolve. This is an STB issue which the STB must resolve on the record before it.

In a filing with the STB dated April 29, 1996 identified as CCRT-4 and CCRT-5, the Coalition for Competitive Rail Transportation (CCRT), an independent shipper driven and managed coalition, several hundred statements were submitted from shippers in many areas of the country who utilize and rely on services from various railroads. In addition a large number of press articles has been provided as part of this filing to the STB. This information reveals in detail both the voluntary expressions of shipper environmental concern about the merger as well as an analysis by media specialists trained in evaluating transportation issues.

Set forth herein is an annotated reference of those shipper environmental concerns keyed to the aforementioned CCRT filing. It is hoped the STB will agree that a review of this raw data will result in a decision, after considering the significant environmental damage that is expected from this shipper community, to aggressively pursue an environmental impact analysis.

It is earnestly hoped on behalf of shippers and communities whose only recourse is the protective shield of the STE that UPSP efforts will not succeed in bullying this merger through the evaluation process of the STB and leave in its wake not only a damaged environment, but also serious threats to the safety and welfare of innocent third parties.

Time is not of the essence in this merger application. It would be a disservice to the public interest to acquiesce in the persistent demands of the Applicants to rush this process in disregard of significant and far reaching issues affecting literally millions of people and their safety. What is of the essence is the health, safety and the preservation of environmental standards which need not be hurriedly and recklessly pushed aside and sacrificed in the interest of preserving the business objectives and plans of a very few individuals.

This statement is submitted on behalf of the members of CCRT who are engaged in shipping activities over the lines and in the geographical area covered by the proposed merger. They have a substantial interest in the outcome of this proceeding. Their comments which follow represent the day to day experience of men and women who are in the best position to assess the potential environmental harm which will result if the merger is approved as filed.

Evidence of Shipper Environmental Concerns

- From the weekly newsletter on transportation issues, which I receive, and from the *Wichita Eagle*, I have learned that the proposed merger of the UP/SP will cause at least 11 coal trains and many more grain trains to pass by our city of Elbing...We do not have regular crossing guides with red lights and levers. It is a country-type crossing. Trains usually pass by here at 40 miles per hour. In addition, the UP has another crossing a few miles south of Elbing. The school buses use this crossing when coming from the Wichita area. Like the city of Wichita and its citizens, I am concerned about these two crossing and the possibility of accidents which might occur because of those extremely long trains. (Statement of Edwin H. Adres before the Surface Transportation Board dated February 13, 1996.) CCRT-4 p. 295
- We have seen more and more shippers using trucks as an alternative, which increases traffic on an already congested highway system. It is important that Texas has a viable competitive rail system. (Texas Farm Bureau letter dated February 22, 1996.) CCRT-4 p. 654
- The result of such a merger would be higher rail rates and a diversion of traffic to the already heavily congested Texas highway system. (Texas Seed Trade Association letter dated March 13, 1996.) CCRT-4 p. 662
- But even more critical, what will happen to an already lacking service? It will deteriorate and the consumer and manufacturers will have to stand the liability. The railroads are already extremely independent and this move will undoubtedly force more freight to an already crowded highway transportation system. (Wortz Crackers & Cookies, letter dated March 12, 1996) CCRT-4 p. 707
- The added truck transportation on a deteriorating state highway system, will increase my state taxes and erode the profit margin even further. (Sibcy Enterprises, Inc., statement of Terry Laird before the Surface Transportation Board February 27, 1996.) CCRT-4 p. 608
- Another major concern I have is the resulting lack of competition in the rail business will cause increased heavy truck traffic on Texas highways.

This could lead to wear and tear on our roadway and more tax dollars to pay for repair and traffic congestion. (P&H Seed Company letter dated March 20, 1996.) CCRT-4 p. 508

- The Gypsum (Agri Producers, Inc.) elevator is within 10 miles of all my farming operation over gravel and blacktop roads. The proposed merger will result in the abandonment of the MP/UP/SP line from Hope to Bridgeport, thus eliminating rail service to Gypsum. Without rail service the Gypsum elevator will not be as competitive with their grain price bid, because all the grain will need to be trucked out. The trucking of all this grain will put an additional burden on county and state highways causing deterioration of these highways. (Statement of Dennis Cooley before the Surface Transportation Board March 11, 1996.) CCRT-4 p. 237
- Everyone in Kiowa will be directly or indirectly affected by the proposed merger and abandonment. It is necessary to have shipping availability within a short driving distance to keep up with the harvest. This merger and abandonment will reduce the availability for connection to main line ports and major grain buyers. One other concern that I have is the condition of the area highways. They are currently in poor condition and if the truck traffic would increase they would only get worse. I feel that this is a safety factor not only for ourselves driving under these conditions but for our children traveling to and from school daily. (Statement of Betty V. Crow before the Surface Transportation Board dated February 23, 1996.) CCRT-4 p. 250
- Because of the proposed Union Pacific-Southern Pacific merger, freight transportation in Arkansas will face the greatest change since the liquidation of the Rock Island Railroad in the early 1980s. The Rock Island debacle resulted in the dismantling of a railroad that paralleled Interstate 40 linking Memphis, Little Rock and Amarillo. This dumped thousands of carloads of freight into trucks, which continue to batter an already congested highway system. Anyone driving in the midst of I-40's bumper-to-bumper 80 mph truck traffic has cause to regret the demise of the Rock Island. (February 11, 1996, *The Brinkley Argus*, February 22, 1996, *The Times*) CCRT-5 p. 187
- More trains mean more traffic gridlock for downtown Reno. There is no way around the tracks between Dickerson Road and the Wells Avenue overpass. While the trains have long been an inconvenience, city

officials are concerned that longer delays could be a life-or-death issue for people hurt or in danger. (January 1, 1996, *Reno Gazette-Journal*) CCRT-5 p. 451

- ...auto traffic will be disrupted every day because of long waits as mile-long trains make their way through the county. (February 22, 1996, *The Wichita Eagle*) CCRT-5 p. 91
- Paul Lambole, Reno's Washington, DC-based lawyer working on the merger, said about 14 trains a day now pass through the city. That number would jump to 36 under the proposed merger, including 12 Burlington Northern-Santa Fe trains, he said. (February 24, 1996, *Reno Gazette-Journal*) CCRT-5 p. 79
- Many Wichitans already upset about the prospect of long traffic delays as they wait for trains to pass across heavily traveled streets. Those concerns won't ease much if the additional trains routed through the city are of the 100-car unit train variety.

Ed Trandhai, a spokesman for the Union Pacific Railroad in Omaha said his company routes about eight trains a day through Wichita. That could double after the merger, he said. (February 26, 1996, *Wichita Eagle*) CCRT-5 p. 70
- "Reno would be impacted most severely by addition train traffic," Hackman said. "The tracks cut through the casino corridor." Reno officials are expecting as many as 36 trains per day through the city if the merger goes through "so they've got a big, big problem," he added. The city now sees about 14 trains per day. (March 4, 1996, *Elko Daily Free Press*) CCRT-5 p. 29
- Union Pacific is also concerned about Sierra's worry that more rail traffic would mean a greater risk to the Truckee River, source of much of the area's drinking water. Southern Pacific now has 14 trains a day passing through Reno City. Officials contend that under the merger that number would rise to 36; the railroads estimate 27. (February 29, 1996, *Reno Gazette Journal*) CCRT-5 p. 63
- Mr. Knight is proposing a draconian demonstration project: deliberately closing a dozen major intersections for 15 minutes to show just how

nasty the new traffic jams would get. That's dramatic, but unnecessary. Mr. Knight doesn't really need to rally the troops, they're fighting mad already. (February 24, 1996, *The Wichita Eagle*) CCRT-5 p. 83

- The UP yard in Salt Lake City is already congested. With this proposed merger, it is a good assumption that within a few years, the UP would close the SP yard, if not entirely, and turn the UP yard to total confusion. (Utah Frieght Association letter dated February 4, 1996.) CCRT-4 p. 676
- Overall increases are predicted in emissions of nitrogen oxide and sulfur dioxide, which are the most prominent pollutants in locomotive fuel...Nearly 60 changes in rail terminal activities will affect local communities. Five local railyards will have at least 100% more traffic if the merger is approved, including a new facility in the Riverside, Calif., area, Salem, ILL., Herington, Kan., and Bellmead and Amarillo, Texas. Volume increases are expected at 23 terminals on Arizona, California, Colorado, Illinois, Kansas, Louisiana, Missouri, Oregon, Texas and Washington where regional air quality does not now meet national attainment standards. Projected rail increases could lead to 25 rail-highway crossing accidents, the applications said...(December 6, 1995, *The Journal of Commerce*) CCRT-5 p. 537
- Let me give you one example of an agricultural supplier/marketer in a Central Texas community that will be impacted. It is an agricultural supply cooperative organization in Bryan, Texas that provides feed, seed fertilizer, supplies, fuel and a number of other inputs to more than 8,000 farmer and rancher producers. It's known as Producers Cooperative Association. Their numbers indicate such a railway merger and subsequent loss of line will impact their bottomline to the tune of \$200,000 in an average year. This is a substantial increase in doing business and will certainly affect the price of service to their members. (Texas Agricultural Cooperative Council letter dated March 20, 1996.) CCRT-4 p. 650
- Our rail service to small communities has declined with too much abandonment. Ghost towns have resulted. (Texas Agri-Women letter dated March 19, 1996.) CCRT-4 p. 652
- If the merger passes, many rural areas in Texas will be without rail

service and it would create financial burdens on producers of agricultural products in Texas. (Texas Poultry Federation letter dated March 11, 1996.) CCRT-4 p. 657

- I've noticed in the past few years that a lot of service to small towns has been discontinued and in fact a lot of the tracks have been dismantled and removed. At one time we were involved in trying to purchase the short line that serves our number 2 plant because that line was being discontinued. Another group did out-bid us but it proved how businesses can be damaged by the discontinuance of service on marginal lines. I have been concerned that the railroads serving the Corpus Christi area might soon consider discontinuing or at least reducing their service here. This trend toward fewer service points has hurt some of our business associates and needs to be addressed. (Gulf Compress letter dated February 7, 1996.) CCRT-4 p. 350
- Today, only one of the country elevators is on rail, and our two sub-terminals and the Enid terminal elevator are on rail, due to the abandonment of rail service in Oklahoma, which has greatly increased our cost of transportation. (W.B. Johnston Grain Company, letter dated March 14, 1996) CCRT-4 p. 417
- Shell is one of the shippers that will face reduced alternatives for rail movements to and from our facilities. (Shell Chemical Company letter dated March 15, 1996.) CCRT-4 p. 595
- The Texas Wheat Producers Association consists of 4,000 members. As much as 80% of wheat is moved by rail for export. Obviously this issue is an important one and goes to the heart of our members' livelihood. The opposition of many of our members is based primarily on the very real possibility that a UP/SP merger could, for competitive reasons, force the closure of many short lines that service our producers. In many cases these lines service rural, isolated areas that a large rail company may find non-feasible. (Texas Wheat Producers Association letter dated March 20, 1996.) CCRT-4 p. 658
- This is of particular concern for small shippers or those geographically located in areas which do not fit in BNSF's strategic plans, or which would require significant capital for BNSF. It stands to reason that BNSF will choose to compete for only that business which fits its logistical

portfolio. (Vista Chemical Company letter dated February 22, 1996.)
CCRT-4 p. 680

- If the railroad to these elevators were to close, our grain would have to be hauled either to Larkin, 40 miles to the south, or Oakley, 65 miles to the north. (Statement of Wayne H. Smith before the Surface Transportation Board dated March 11, 1996) CCRT-4 p. 613
- The recently filed notice of the Union Pacific and Southern Pacific merger indicates that the rail line that runs near our feed mill site may be abandoned within three (3) years. If this action occurs, then we will have much less flexibility for transportation of feed ingredients to our feed mill. This will no doubt hinder our prospects for growth. (Newsham Hybrids (USA) Inc. letter dated September 25, 1995.) CCRT-4 p. 484-5
- Our other location for grain handling would be at Cheyenne Wells which is 80 miles from here. The facility there is owned and operated by Cargill, which also has many facilities on that rail line. I am afraid that if this line is abandoned, the price of our freight by rail and the price of our grain could very easily be controlled by the Up-SP and Cargill. That is not good! If Up-SP feels that they are losing money by having this line, then let them sell it, but it should not just be abandoned. Additional competition would benefit more than just our area. If a sale could take place and the new owners would have grain cars available at harvest time, I'm all for it as the present owners haven't always made cars available when they were needed. (Statement of Delmer Eikenberg before the Surface Transportation Board dated February 23, 1996) CCRT-4 p. 289
- If the successor to the Interstate Commerce Commission cannot stop abandonments of rail lines that affect thousands of customers and communities, how can there be a "public-interest standard: for anything it does? Is that actually "a railroad interest standard"? (Monday November 13, 1995, *Journal of Commerce*.) CCRT-5 p. 725
- Bob Glynn's giants come in the shape of iron horses. The difference is, Glynn's giants are real. The Hoisington man is convinced that the continuing mergers in the railroad industry spell disaster as in "abandonment" for his and other small towns across the mountains and

plains. And whatever one man can do about it, he's going to do.
(January 17, 1996, *Topeka Capital-Journal*.) CCRT-5 p. 370

- Union Pacific has said it will abandon the 173 mile line from Dotsero to Canon City, and it will limit freight on its Moffat Tunnel line to local products, largely coal and grain. Mixed freight bound across country will be run on UP's southern Wyoming line. (February 4, 1996, *The Daily Sentinel*) CCRT-5 p. 238
- "The merger not only threatens the livelihood of railroad employees, but it threatens the livelihood of entire communities," said Coalition chairman Junior Strecker of the Scott Co-op Association in Scott City. "We will do everything in our power to fight the merger and the proposed abandonments." The rail line from Kansas City to Pueblo, Colo., is at risk because of proposed abandonments from Towner to Pueblo and Canon City to Sage in Colorado, and Bridgeport to Hope in Kansas would be affected, Strecker said. (January 17, 1996, *Great Bend Tribune*.) CCRT-5 p. 368.
- The abandonments could eliminate Class I Carrier service along the current line through central Kansas. Class I refers to service on a transcontinental line. A shortline is not the answer, Strecker said, because service and accessibility would be so limited. (January 19, 1996, *Rocky Mountain News*.) CCRT-5 p. 338
- Denver Rio Grande, which owns Southern Pacific Rail Co., wants to abandon a stretch of local track as part of a pending merger with Union Pacific. The line extends from three miles west of Eagle to Canon City, near Colorado Springs. Local government officials had hoped to buy the Tennessee Pass line for use in a rails-to-trails program or for area light-rail transit. (February 11, 1996, *Vail Daily*.) CCRT-5 p. 188
- Union Pacific recently filed to abandon the line contingent upon the ICC's ruling on the merger. Rail traffic to and from Kasten's business will then cease, he said. "It means death for us," Kasten said. Kasten said the big business merger is forgetting the little guy. (November 14, 1995 *Intelligencer*.) CCRT-5 p. 679.
- As part of their merger application filed with the Interstate Commerce Commission last week, the Union Pacific and Southern Pacific railroad

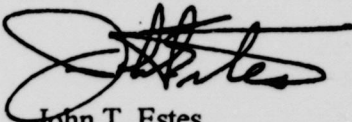
companies said they planned to abandon nearly 300 miles of Colorado rail lines. One corridor proposed for abandonment runs 170 miles from Canon City to Minturn, crossing the Continental Divide at Tennessee Pass near Leadville. The other corridor runs 120 miles from Pueblo to the Kansas border. The railroad company that owns the line can tear up the tracks and sell the land along the corridor. (December 7, 1995, *The Daily Times*.) CCRT-5 p. 536

- In addition, Rogers said the merger could force the closure of the Southern Pacific line from Brinkley to Memphis since Union Pacific already has an access to Memphis. (January 18, 1996, *Jonesboro Sun*.) CCRT-5 p. 346
- The impact of the Pueblo area wasn't indicated, but the UP want to abandon its tracks east of town as well as the SP's historic Royal Gorge route from Canon City to Dotsero. (December 1, 1995, *The Pueblo Chieftain*.) CCRT-5 p. 584
- At last month's hearings, James F. Jundzilo, transportation manager for Tetra Chemicals, told the committees, "The Class 1 railroads appear to be stripping down the track capacity to eliminate just the type of track we need to do business." (December 1995, *Traffic Management*.) CCRT-5 p. 453
- Captive shippers, located on only one line, are seeing transportation costs increase, often forcing a shift from rail to truck transportation. (February 11, 1996 *The Brinkley Argus*.) CCRT-5 p. 187
- The effects of reduced rail competition on rates is just one concern. The mergers also have caused shortages of rail cars during harvest, abandonment of track some shippers depend on to get products to market and concerns that ever-larger rail lines will ignore rural areas. (December 10, 1995, *The Hays Daily News*.) CCRT-5 p. 524
- But some shippers aren't convinced. The merger will not change the trend of the Class I railroads to bypass smaller grain elevators, says James J. Irlandi, advisor to the Kansas/Colorado Shippers Association. "The small shippers will not be served," Irlandi says. "And if you don't get cars and you are forced to truck, you have no five-year average

that you can use to order cars." In addition, says Irlandi, shippers are having a hard time getting grain outside of short-line territories as these short lines are often leased from the UP railroad and their rates aren't competitive enough to go beyond the short-line connection. (February, 1996, *Distribution*.) CCRT-5 p. 56-8

- If approved, opponents said the merger would create 5,000 miles of overlapping track, leaving abandoned tracks and facilities and causing massive job losses. (November 9, 1995, *San Angelo Standard - Times*.) CCRT-5 p. 781

Respectfully submitted,



John T. Estes
Executive Director
Coalition for Competitive Rail Transportation

May 3, 1996

STB FD

32760

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May # 67

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5	Part of Public Record



**PLACER COUNTY
DEPARTMENT OF PUBLIC WORKS**

May 2, 1996

Surface Transportation Board
Section of Environmental Analysis, Room 3219
Attn: Elaine K. Kaiser
1201 Constitution Ave., N.W.
Washington, D.C. 20423



SUBJECT: ENVIRONMENTAL ASSESSMENT OF PROPOSED UP/SP MERGER

Dear Ms. Kaiser,

Thank you for providing Placer County with the opportunity to review and comment on the Environmental Assessment of the proposed merger of the Union Pacific and Souther Pacific Railroads. The proposed merger is of interest to Placer County because of the potential for the merger to create adverse impacts. In summarizing our comments, Placer County is concerned with the adverse impacts related to:

- ☐ safety at at-grade crossings;
- ☐ safety with respect to blockage of emergency service responses;
- ☐ safety due to the increased likelihood of a hazardous material incident;
- ☐ regional and local transportation systems due to increased congestion and delay at at-grade crossings; and
- ☐ noise and air quality impacts.

We feel that the Environmental Assessment fails to address some very fundamental and crucial aspects of these issues. Finally, the mitigation measures that have been proposed are slanted toward consulting with appropriate agencies and developing plans, but lack requirements for implementation. We feel that this needs to be strengthened.

We offer the following specific comments on the Environmental Assessment of the proposed merger of the Union Pacific and Southern Pacific Railroads (Finance Docket No. 32760), for your consideration.

Volume 1, Page 1-10. The Surface Transportation Board's Air Quality and Noise Thresholds for Impact Analysis for Rail Yards is questionable. A percentage increase in carload activity does not seem to be an appropriate indicator of the potential for impact on

Elaine K. Kaiser
May 2, 1996
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noise or air quality. We believe that there needs to be another qualifying indicator, as with the other thresholds. An examination of Table 1-4 provides an indication of how such a threshold is flawed. The Roseville, California Rail Yard is expected to experience an increase of 584 rail cars per day which is not identified as having the potential for noise impacts. Yet, the Salem, Illinois Rail Yard will experience an increase of 69 railcars per day and has been identified as having the potential for noise impacts.

Volume 1, Page 2-20. The Environmental Assessment fails to adequately address impacts to local and regional systems. This is due to the fact that the definition of impacts to local and regional transportation systems is too narrow in focus. It therefore misses the most significant potential impact, which is the impact of additional train activity at at-grade crossings of the local and regional transportation system. With 39,884 at-grade crossings it is easy to see that the additional train activity will have far greater impact on local and regional transportation systems than the 2,648 additional trucks in the vicinity of intermodal facilities.

Volume 1, Page 2-22. Safety impacts fail to recognize the potential for an impact to safety due to additional trains at at-grade crossings. To limit the potential impact to "new rail-highway grade crossings" is inappropriate. Another safety issue that is not addressed is the impact to emergency service response times. This issue is critical to Placer County, where large areas become isolated with the blockage of at-grade crossings, blockages that will increase with more frequent and longer trains.

Volume 1, Page 2-22. The safety impacts at at-grade crossings are dismissed by the nonsensical statement that "51 percent of rail segments on the merged system would experience an increase in train traffic, 8 percent experience no change, and 41 percent would experience a decrease." This technique for measuring impact bears absolutely no relationship to the criteria stated earlier in the same paragraph. These criteria include train and highway traffic, the number of tracks, the pavement surface, the number of highway lanes, traffic and train speed, etc. The document should acknowledge that there will be a significant adverse safety impact at at-grade crossings in Placer County as a result of the tremendous increase in train activity on the Roseville to Sparks and Roseville to Marysville rail lines.

Volume 1, Page 2-23. There is no basis for the assertion that because some rail lines will experience a decrease in train activity and some will experience an increase that there will be a negligible increase in delay. In fact, it does not consider the factors which influence delay as cited in the previous paragraph (specifically train length and speed of train). Obviously, the impact of the merger on delay can not be assessed by only determining the number of lines that will experience an increase or decrease in rail traffic. These measures fail to recognize the vast differences that exist between the numerous lines. As an example, in Placer County, the Donner Route between Roseville and Sparks has two lines. One of

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May 2, 1996
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these lines has many more at-grade crossings than the other. An increase on this line will have a far greater delay impact than an increase on the other.

Volume 1, Page 2-24. Based on the projected increase in rail line traffic, the likelihood of a hazardous material incident will be increased by almost 50% in Placer County. Based on the increase in the number of rail cars handled at the Roseville yard, the projected increase in the likelihood of a hazardous material incident is over 50%. This is a significant impact that warrants discussion and mitigation.

Volume 1, Page 2-25. One of the fuel consumption impacts that has been dismissed is the effect of increased delays at at-grade crossings. Fuel consumption would increase with idling vehicles and with engine stops and starts.

Volume 2, Page 1-4. Again, the criteria for determining impacts on local and regional transportation systems is too narrow in focus. It misses the most important measure of potential impact: disruption of traffic flows at at-grade crossings.

Volume 2, Page 1-23. The conclusion that the merger will result in no adverse energy-related impacts fails to consider increased fuel consumption caused by delays at at-grade crossings. With 39,884 at-grade crossings, vehicular fuel consumption on roadways delayed by a passing train is obviously a more important consideration of fuel consumption impacts than the number of truck to train diversions.

Volume 2, Page 1-23 (and Appendix G). The air quality impact evaluation does not consider the impact of idling vehicles at at-grade crossing due to increased vehicular delay. Additional pollutants will be emitted due to this idling and engine stops and starts.

Volume 2, Page 4-2. A portion of the Sacramento Valley AQCR is in a non-attainment area for ozone. This appears to have been inadvertently omitted.

Volume 2, Page 4-21. The conclusion that no adverse air quality impacts will occur appears to be based on the amount of emissions at one crossing of 5,000 vehicles per day. We believe that two significant issues have not been considered in making this conclusion. First, the evaluation of air quality impacts at grade crossings fails to include automobile and truck engines stops and starts. Second, the evaluation does not consider the number of crossings effected or the actual traffic volume at the crossings.

Volume 2, Page 4-27. In the discussion of Auburn, it is stated that there are four crossings on the eastern line and none on the western. There are five on the eastern (Luther Road, Auburn Ravine Road, Agard Street, Pleasant Avenue, Sacramento Street) and one on the western (Blocker Drive).

Volume 2, Page 4-28. For Loomis, it is stated that there are two at-grade crossings. There are three (Webb Street, Sierra College Boulevard and King Road). The community of Newcastle, one of the few locations where both the eastern and western tracks are side-by-side, and with a population concentration much denser than many of the other cited communities, is conspicuously absent.

Volume 2, Page 4-29. As shown in the Table, which does not include the above mentioned omissions, the number of sensitive receptors will more than double in Placer County. This must be considered a significant adverse impact.

Volume 2, Page 4-42. The mitigation measures consist of consultations and development of plans, and lack any requirements for implementation. Each mitigation measure should be changed to include implementation. Specifically, the following changes are recommended:

Air Quality. The sentence "UP/SP shall advise SEA of the results of these consultations" should be changed to "UP/SP shall implement all reasonable mitigation measures developed jointly with appropriate Federal, State and local agencies and shall advise SEA of progress toward implementation of each measure."

Noise. The first sentence should be changed from "..., UP/SP shall consult with appropriate state and local agencies to develop noise abatement plans" to "..., UP/SP shall consult with appropriate state and local agencies to develop and implement noise abatement plans. The noise abatement plans shall be approved by the appropriate state and local agencies and SEA."

Transportation and Safety. The last sentence should be changed from "UP/SP shall periodically advise SEA of the status of these consultations ..." to "UP/SP shall submit the final mitigation plans to the SEA, shall implement the mutually agreeable mitigation plans, and shall advise SEA on a quarterly basis of the status of implementation."

Finally, mitigation measures will need to be identified when meaningful analysis of delay, safety, energy consumption and hazardous material impacts is performed. We have been in a dialogue with Union Pacific Railroad in an attempt to identify appropriate mitigation of the impacts that we can foresee.

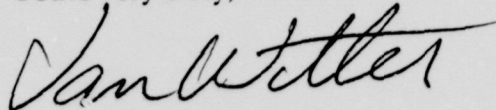
In conclusion, there are a number of issues that must be addressed before the SEA can make a defensible conclusion on the potential impact of the merger. Noise and air quality thresholds for rail yards must be re-visited, the focus of impacts to regional and local transportation networks must address at-grade crossings, the safety impacts analysis needs to provide a meaningful discussion of at-grade crossings and emergency service response

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May 2, 1996
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times, the increase in hazardous material incidents must be discussed and mitigated, the impacts due to delay need to be discussed, fuel consumption due to additional delays must be quantified, and emissions due to idling and engine stops and starts must be included in the air quality analysis.

Thank you for providing us the opportunity to review the environmental assessment. If you have any questions, please feel free to contact Mr. Thomas F. Brinkman at 916-889-7514 if you have any questions.

Yours very truly,

A handwritten signature in black ink, appearing to read "Jan Witter", with a stylized, cursive script.

Jan Witter
Director of Public Works

JW:TB:lb

cc: Don Lunsford, County Executive Officer
Anthony LaBouff, County Counsel
John Marin, Board of Supervisors
Fred Yeager, Planning Director
Tim Douglas, PCTPA

STB

FD

32760

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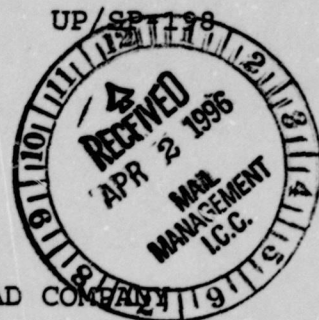
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BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY
AND MISSOURI PACIFIC RAILROAD COMPANY
-- CONTROL AND MERGER --
SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY
COMPANY, SPCSL CORP. AND THE DENVER AND
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ERRATA TO ENVIRONMENTAL REPORT

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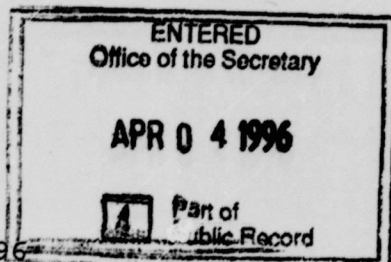
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April 2, 1996

BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY
COMPANY, SPCSL CORP. AND THE DENVER AND
GRANDE WESTERN RAILROAD COMPANY

ERRATA TO ENVIRONMENTAL REPORT

Applicants UPC, UPRR, MPRR, SPR, SPT, SSW, SPCSL and
DRGW submit the following errata to Volume 6, part 1 of the
Environmental Report in the primary application:

<u>Page</u>	<u>Line</u>	<u>Change</u>
53	7	<p>Change "train-miles traveled of 6,204,270 per year" to "train-miles traveled of 4,214,290 per year"</p> <p>The daily increase in train miles (z over y variance) of 11,546 multiplied by 365 days per year results in an increase of 4,214,290 train-miles traveled per year. The prior figure included changes in train-miles resulting from other mergers.</p>
53	9	<p>Change "a predicted increase of 25 accidents" to "a predicted increase of 17 accidents"</p> <p>There are 4.07 accidents per 1,000,000 train-miles traveled. Therefore, there will be 17 accidents for 4,214,290 train-miles traveled.</p>

Respectfully submitted,

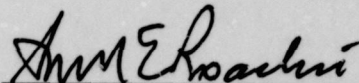
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Corporation, Union Pacific
Railroad Company and Missouri
Pacific Railroad Company

April 2, 1996

CERTIFICATE OF SERVICE

I, Michael L. Rosenthal, certify that, on this 2nd day of April, 1996, I caused a copy of the foregoing document to be served by first-class mail, postage prepaid, or by a more expeditious manner of delivery on all parties of record in Finance Docket No. 32760, and on

Director of Operations
Antitrust Division
Suite 500
Department of Justice
Washington, D.C. 20530

Premarmer Notification Office
Bureau of Competition
Room 303
Federal Trade Commission
Washington, D.C. 20580

Michael L. Rosenthal

Michael L. Rosenthal

STB

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3-5-96

✓ K



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
MUSKOGEE AREA OFFICE
101 N. 5th STREET
MUSKOGEE, OK 74401-6206

IN REPLY REFER TO:

Trust Operations
(Environmental Scientist)

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OFFICE OF SECRETARY

Surface Transportation Board
Section of Environmental Analysis
12th and Constitution
Washington, D.C. 20423-0001

FD 32760

To Whom It May Concern:

The Muskogee Area Bureau of Indian Affairs has reviewed the proposed merger between Union Pacific and Southern Pacific Railroads for areas of environmental concerns within the Bureau's jurisdiction.

Potential environmental impacts regarding increases in rail traffic on existing transportation systems near Indian lands were considered. An increase in traffic may result in more train derailments, hazardous releases, and train-vehicle collisions. The counties of Grady, Stephens, and Jefferson are within the Chickasaw Nation of Oklahoma territorial boundaries. The Chickasaw Agency, Bureau of Indian Affairs, provides the Chickasaw Nation with Law Enforcement and Emergency Response.

Tribal lands and Indian people are checkerboard throughout these counties and may be directly impacted by rail accidents should they occur. Coordination and notification of emergency situations with the Chickasaw Agency, Bureau of Indian Affairs, would be required for incidents involving counties of Grady, Jefferson, and Stephens, Oklahoma. A copy of Union Pacific's Emergency Response Plan is requested to complete the Bureau's Emergency Preparedness Plan. The Bureau will provide Union Pacific with a list of contacts during and after work hours to complete the information necessary for emergency response situations. Significant impacts to Public Health and Safety are not anticipated if Emergency Response Plans and Emergency Preparedness Plans are in place.

Significant impacts to tribal land use, air quality, noise, biological resources, water resources, historic, cultural, archeological, and tribal populations are not anticipated.

Thank you for the opportunity to comment on these proposed actions early in the planning stage.

Sincerely,

James S. Fultz
Acting Area Director



DEPARTMENT OF THE ARMY
GALVESTON DISTRICT, CORPS OF ENGINEERS
P.O. BOX 1229
GALVESTON, TEXAS 77553-1229

REPLY TO
ATTENTION OF:

December 19, 1995

Environmental
Resources Branch

Section of Environmental Analysis
Room 3219
Interstate Commerce Commission
Washington, DC 20423

To Whom It May Concern:

FD 32760

RECEIVED
OFFICE OF ECONOMICS
DIRECTOR'S OFFICE
INTERSTATE COMMERCE
COMMISSION

Dec 27 9 09 AM '95

This is in response to a letter with accompanying Environmental Report (Volume 6, Parts 1-6) from Union Pacific Railroad Company concerning the merger of Union Pacific Corporation, et al., with Southern Pacific Rail Corporation, et al., Finance Docket 32760, as submitted to us for review and comment. Consideration by elements of the Planning, Engineering, and Construction-Operations Divisions has determined that prior to actual abandonment/construction of rail segments within the jurisdiction of the Galveston District (boundary map enclosed), the Chief of Evaluation should be contacted at 409/766-3938. At that time, more detailed evaluation can be provided to determine if Department of the Army permits will be necessary. Please refer to File No. D-7279 in your communications.

We appreciate the opportunity to review and comment upon the proposed merger and trust that this response facilitates your planning and implementation process.

Sincerely,

Encl

James Shaw
for Richard Medina
Chief, Environmental
Resources Branch

TULSA DISTRICT

REGULATORY SECTION, CESWT-OD-RF

PO BOX 61

TULSA, OK 74121-0061

918-581-7261

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ALBUQUERQUE DISTRICT

REGULATORY BRANCH

CESWA-CO-R

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ALBUQUERQUE, NM 87103-1580

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PERMITS SECTION, CESWF-OD-O

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FORT WORTH, TX 76102-0300

817-334-2881

GALVESTON DISTRICT

REGULATORY BRANCH, CESWG-CO-R

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409-766-3930

STATE BOUNDARY

REGULATORY BOUNDARY

25 JUNE 1987