

STB

FD-33388

2-3-98

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ID-CITIES

PRESIDENT:
CHRISTOPHER SMITH

PRESIDENT PRO TEM:
CLAY JANSSON

VILLAGE OF MILFORD



COUNCILMEMBERS:
JERRY AUBRY
LESLIE KETTREN
JAMES KOVACH
THOMAS NADER
NANCY WEEKS

January 30, 1998

Attn: Elaine K. Kaiser
Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
1925 K Street, NW
Washington D.C. 20423-0001

ENVIRONMENTAL
DOCUMENT



RE: Finance Docket No. 33388 -CSX and Norfolk Southern - Control and Acquisition -
Conrail: Draft Environmental Impact Statement

I am writing in response to the request for comments regarding the EIS of CSX acquisition of Conrail lines within Michigan.

As a community currently served by CSX we have concerns regarding the policy of maintenance and service CSX will afford those communities now on the Conrail system that will shortly be served by CSX. Issues we feel should be addressed include:

1. Replaced wooden ties are disposed of by simply throwing them down on the embankment forming the right-of-way for the track. We believe that a developed urban area should be given more consideration especially given the prominent and visible location of the rail lines as it passes in a community.
2. Cutting and trimming of brush and junk trees is not regularly done. We believe that a developed urban area should be given more consideration, especially given the prominent and visible location of the rail lines as it passes through town.
3. The deterioration of overpasses, both for safety concerns which are probably more the accepted topic of the railroad, and the general upkeep of rusty unpainted overpasses as they clearly occupy a prominent role to the community.
4. The location of pedestrian crossings (for pedestrians only) in a downtown setting, currently requires the installation of a fully automatic roadway-style signalization totally installed at the municipality expense.

January 30, 1998

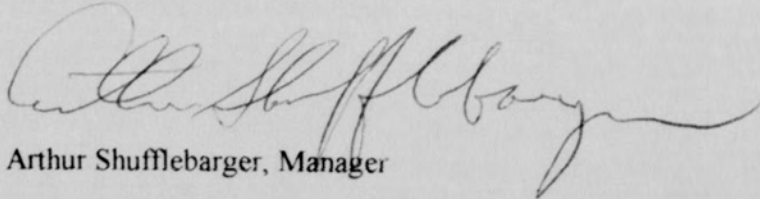
Page 2

5. The continued maintenance of the track base is accomplished by raising the tracks by 4 - 5 inches every 2 to 3 years. At street crossings the roadways are gradually starting to "peak", making the approach increasingly dangerous. The approaches to the crossings must be corrected.

Thank you for the opportunity to air our concerns. Please call if I maybe of any assistance.

Sincerely,

VILLAGE OF MILFORD



Arthur Shufflebarger, Manager

cc : L. Brooks Patterson, Oakland County Executive
Dennis Powers, County Commissioner
Nancy Cassis, State Representative
Bill Bullard, State Senator

STB

FD-33388

2-3-98

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ID-FEDS



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
NEW YORK DISTRICT, CORPS OF ENGINEERS
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, N.Y. 10278-0090

JAN 29 1998



Regulatory Branch

SUBJECT: Comments to the Draft Environmental Impact Statement for
Proposed Conrail Acquisition

Ms. Elaine K. Kaiser, Chief
Section of Environmental Analysis
Surface Transportation Board
1925 K. Street, NW
Washington, D.C. 20423-0001

ENVIRONMENTAL
DOCUMENT

Dear Ms. Kaiser:

This is in response to your October 1, 1997 letter requesting comments on the Draft Environmental Impact Statement (DEIS) for the proposed acquisition of Conrail's assets by Norfolk Southern Railroad and CSX Railroad.

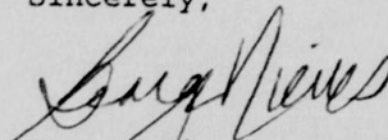
We have reviewed the DEIS and noted that the map of Little Ferry, Bergen County, New Jersey in Figure 5-NJ-5, Volume 3B of the DEIS depicts wetland areas regulated by New Jersey Department of Environmental Protection. Work in these and/or nearby areas may also be regulated by the U.S Army Corps of Engineers. Our jurisdiction would include the discharge of dredged or fill material into any wetlands, freshwater or tidal, on the site or into the waterway waterward of the spring high tide line. If such work is proposed within waters of the United States at Little Ferry, a Department of the Army permit from the New York District will be necessary. In order for us to accurately determine the extent of our jurisdiction on the site, a wetland delineation would need to be submitted for our review and approval. Once we receive a wetland delineation for the site, we will then be able to schedule a site inspection.

If the proposed work would not involve work within our jurisdiction, a permit will not be required and no further contact with this office will be necessary. If work is proposed within our jurisdiction, the appropriate application documents should be submitted at an appropriate juncture.

For impacts to waters of the United States at the Gardenville Junction at the City of Buffalo, Erie County, New York you will need to contact the US Army Corps of Engineers Buffalo District at 1776 Niagara Street, Buffalo, New York 14207-3199, ATTN: NCBCO-S.

If you have any questions regarding this letter, please
contact Mr. James Cannon, of my staff, at (212) 264-0184.

Sincerely,

A handwritten signature in dark ink, appearing to read "George Nieves". The signature is fluid and cursive, with the first name "George" written in a larger, more prominent script than the last name "Nieves".

George Nieves
Chief, Western Permits Section

STB

FD-33388

2-3-98

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ID-GOV



DIVISION OF NATURAL RESOURCES

Wildlife Resources Section

Operations Center

P.O. Box 67

Elkins, West Virginia 26241-3235

Telephone (304) 637-0245

Fax (304) 637-0250

Cecil H. Underwood
Governor



John B. Rader
Director

January 30, 1998

Office of the Secretary
Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K Street
Washington, DC 20423-0001

**ENVIRONMENTAL
DOCUMENT**

Attention:
Elaine K. Kaiser
Chief, Section of Environmental Analysis
Environmental Filing

Dear Ms. Kaiser:

The West Virginia Division of Natural Resources (WVDNR) has reviewed the Draft Environmental Impact Statement for the "Proposed Conrail Acquisition" prepared by the Surface Transportation Board. The WVDNR anticipates few adverse impacts to fish and wildlife to result from the acquisition of Conrail by CSX and Norfolk Southern.

Sincerely,

A handwritten signature in cursive script that reads "James W. Rawson".

James W. Rawson, Supervisor
Environmental Coordination

JWR/sk

STB

FD-33388

2-3-98

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ID-CITIES

GREGORY E. PITONIAK
Mayor

DOROTHY R. WEST
City Clerk

JACK HAYDON
Treasurer

City of Taylor

23555 GODDARD ROAD
TAYLOR, MICHIGAN 48180

PHONE: (734) 287-6550 (Menu) • FAX: (734) 374-1343

CITY COUNCIL

GREGORY BZURA
Chairman

MARY ANN RILEY
Chairwoman Pro-Tem

DELORES CHORKALUK

PAULINE ETTORE

DAVID W. GEISS

DENNIS McDERMOTT

JACKLYN MOLNER

ENVIRONMENTAL
DOCUMENT



February 1, 1998

Ms. Elaine K. Kaiser
Environmental Project Director
Environmental Filing
Office of the Secretary
Case Control Unit
Finance Docket #33388
Surface Transportation Board
1925 K Street, NW
Washington, D.C. 20423-0001

Re: Proposed acquisition of Conrail by Norfolk Southern Railroad
& CSX Railroad

Dear Ms. Kaiser:

The City of Taylor upon review of Chapter 5 of the Environmental Impact Statement (EIS) for the acquisition of Conrail by Norfolk Southern Railroad and CSX Railroad would like to address the following concerns.

The average daily traffic (ADT) counts utilized in the December, 1997 EIS, do not match the information the City of Taylor has attained from Wayne County Department of Public Service (WCDPS). The (WCDPS) "24 Hour Traffic Volume Counts", dated December 1, 1996, shows significantly higher traffic counts than those shown in the EIS. A change in traffic counts will affect the analysis of highway/rail at grade crossings and the analysis of highway/rail crossing delays. We request that the correct traffic counts be considered.

We are also concerned that the additional train traffic through the City of Taylor proposed in the EIS may affect the emergency response activities of police, fire and rescue. Obviously anything that could reduce response time will impede and threaten the health, safety and welfare of our citizens.



Ms. Elaine K. Kaiser
February 1, 1998
Page 2

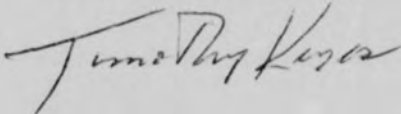
The summary of potential affects of rail transport of hazardous materials was vague. The estimated carloads of hazardous materials between Carleton, MI and Toledo, OH doubles according to the EIS, but there is no reference to any increase between Carleton, MI and Ecorse, MI. Are all hazardous materials off-loaded in Carleton?

The increase in train traffic, according to the EIS, will increase noise. The EIS suggests various methods to mitigate the impact of noise. The EIS also recommends the railroads meet with the communities to decide how best to accomplish mitigation. To date, we have not had any contact with the railroads.

We have many concerns relating to the proposed acquisition. Foremost, is the lack of information the City of Taylor has received from the Section of Environmental Analysis of the Surface Transportation Board. Secondly, the City has serious concerns relating to traffic delay problems and the associated level of service of our roads due to the increased train traffic.

Please feel free to call me at (734) 374-2733 to further discuss these issues.

Very truly yours,



Timothy Keyes,
Special Projects Manager

xc: Mayor Gregory E. Pitoniak
Frank Bacha, Executive Director, DPW
Tom Bonner, Police Chief
Ted Swope, Fire Chief
Gerald Couch, Executive Director, O.D.S.

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FD-33388

2-2-98

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ID-CITIES



City of Cleveland
Office of the Council

Roosevelt Coats

Councilman, 10th Ward • Majority Leader

*Committees: Public Service, Chairman • Community & Economic Development
Finance • Public Utilities • Rules*

**ENVIRONMENTAL
DOCUMENT**

January 22, 1998



Office of the Secretary
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423-0001

Dear Secretary and Members of the Surface Transportation Board:

I am writing in opposition to the CSX/Conrail merger that will negatively affect the residents of Ward 10 located in the northeast portion of the City of Cleveland. In light of the research prepared by the City presented in the environmental impact statement by the surface transportation board, and the concerns I hear from neighborhood residents, it is clear to me the proposed merger between CSX and Conrail is at the cost of residents in neighborhoods I represent.

The proposed increase of trains comes on tracks that cut right through my ward. These tracks are rarely used at present, and in some places run through densely populated neighborhoods. An increase in train traffic would affect many people in profound ways.

Delays in traffic at crossing, especially delays in emergency vehicle traffic could create a life-threatening problem for Ward 10 residents. As the shipping of train cargo is virtually unregulated, in the event of an accident, the proposed train traffic is more likely to create a significant health hazard and emergency situation in Ward 10, for which the City must be constantly prepared. The value of real property for residents adjacent to the tracks could plummet, as the location would be increasingly less desirable. Finally the quality of life would be diminished from such dramatic increases in train traffic, and the resulting loss of air quality and increase in noise.

The City prepared and filed a great deal of information in this regard, and indicated that the neighborhoods most affected are black and low-income neighborhoods. Ward 10 includes the Euclid Green, Collinwood and Forest Hills neighborhoods. My community is among those proposed to receive the most damage from this proposal, therefore, I oppose the CSX/Conrail merger.

Sincerely,

Roosevelt Coats
Councilman, 10th Ward
Majority Leader

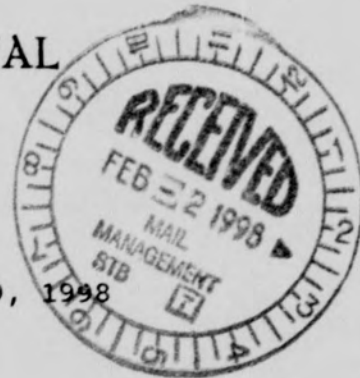
Residence • 1775 Cliffview Road • Cleveland, Ohio 44110 • (216)486-2323
Ward Office • 14036 St. Clair Avenue • Cleveland, Ohio 44110 • (216)851-8880
City Hall • Room 220 • 601 Lakeside Avenue • Cleveland, Ohio 44114 • (216) 664-4743 • Fax (216) 664-3837

STB FD-33388 2-2-98 K ID-CITIES



TOWN OF FRONT ROYAL

P.O. BOX 1560
FRONT ROYAL, VIRGINIA 22630
(540) 635-8007
FAX: (540) 636-7475



January 29, 1998

Office of the Secretary
Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423-0001

ENVIRONMENTAL
DOCUMENT

ATTN: Elaine K. Kaiser
Environmental Project Director
Environmental Filing

Dear Ms. Kaiser,

The Front Royal Town Council, during its regular meeting held January 26, 1998, voted to adopt a resolution pertaining to Finance Docket #33388 regarding the CSX and Norfolk Southern Control and Acquisition of Conrail Draft Environmental Impact Statement. I have enclosed the original, plus ten copies, of the resolution for your consideration.

Very truly yours,

Rhonda S. North, CMC/AAE
Clerk of Council

RSN\

cc: Director of Planning

RESOLUTION
REGARDING FINANCE DOCKET NO. 33388
CSX AND NORFOLK SOUTHERN
CONTROL AND ACQUISITION OF CONRAIL
DRAFT ENVIRONMENTAL IMPACT STATEMENT



WHEREAS, the Town of Front Royal, Virginia and Warren County are currently served by the Norfolk-Southern Railway; and,

WHEREAS, in the last decade, this community has experienced a significant increase in rail traffic as a result of express freight traffic on the line from Riverton Junction to Manassas; and,

WHEREAS, the citizens of the Town of Front Royal and Warren County have experienced impacts due to noise, air quality and significant traffic conflicts at grade crossings during this period; and,

WHEREAS, industrial development in the County, including the Virginia Inland Port, has occurred because of the availability of local rail service, but has not been the main cause of traffic increases; and,

WHEREAS, the Environmental Report received July 1997 projected changes in the three major rail segments centered on Riverton Junction in Front Royal – north toward Harrisburg, a 77% increase from 11.1 to 19.6 trains per day; south to Roanoke, a 210% increase from 3.9 to 12.3 trains per day; and east to Manassas, a 22% reduction from 11.3 to 8.8 trains per day; and,

WHEREAS, the Draft Environmental Impact Statement dated December 12, 1997 concludes there is only minimal impact for air quality, noise, grade crossing conflicts and accidents for the Town of front Royal and Warren County, despite the fact that air quality and noise impacts exceed the Surface Transportation Board's thresholds; and,

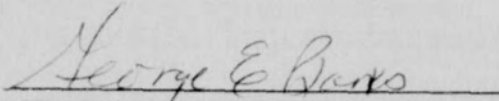
WHEREAS, the train traffic projections are highly speculative given the strategic location of Riverton Junction for east coast and midwestern rail traffic and the high probability of increased through freight traffic; and,

WHEREAS, the citizens of the Town of Front Royal are already coping with the current increases in through traffic as previously noted.

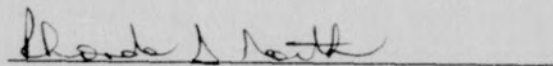
NOW, THEREFORE BE IT RESOLVED, that the Front Royal Town Council petitions the Surface Transportation Board to consider the high probability of more significant environmental impacts on this community due to the proposed acquisition; and,

AND BE IT FURTHER RESOLVED, that the Final Environmental Impact Statement include a requirement for a five year review period from the effective date of the final decision for the assessment of environmental impacts and remediation options.

APPROVE:


GEORGE E. BANKS, MAYOR

ATTEST:


RHONDA S. NORTH, Clerk of Council

This resolution was adopted by the Town Council of the Town of Front Royal, Virginia, on the 26th day of January, 1998.

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CITY of FOSTORIA

P. O. Drawer H
FOSTORIA, OHIO 44830



January 28, 1998

Office of the Secretary
Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K. Street, NW
Washington, DC 20423-0001

ENVIRONMENTAL
DOCUMENT

Board Members:

The City of Fostoria is concerned that its safety concerns are almost completely ignored and inadequately addressed in the Draft Environmental Impact Statement, in fact, the lack of comments would leave one to wonder if the City's comments, submitted with the State of Ohio during the Preliminary Safety and Environmental Comment Period, were considered.

Although segments C-070 (Marion-Fostoria) and C-075 (Willard-Fostoria) are identified as meeting the threshold for analysis by the SEA neither the individual nor the cumulative impacts of the increased rail traffic are considered on a community wide basis for safety and grade crossing delays.

The foremost item of concern remains the ingress/egress issues raised in the Preliminary Safety and Environmental Comment Period. The measurable delay for emergency responders will be dramatically increased as a result of the acquisition. Our estimates indicate that with nearly a 30% increase in rail traffic throughout the community, utilizing the SEA's formula, a at-grade crossing will be blocked over 12 of the 24 hours, which is over 50% of the day. Under the existing current volume levels, a train is blocking one or more at-grade crossing in Fostoria nine and one quarter (9.25) hours out of each twenty-four hour day.

We agree that not all of the crossing will be blocked at the same time, however an emergency vehicle has no schedule as to what time of day the crossing it needs will be blocked. With any given rail crossing blocked over half of the day, it becomes apparent that some alternative provision needs to be made for the safety of the residents within the Iron Triangles in particular.

It is strongly recommended that the potential for these two areas to become isolated by rail movements, and the unreliability and unpredictability of direct emergency service routes, be

considered in addition to the established SEA criteria. The construction of grade separations in both areas is highly recommended.

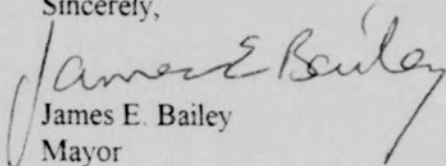
As a result of the acquisition, the City of Fostoria stands to be significantly impacted in the amount of Hazardous Material rail car loads on an annual basis. The Draft EIS indicates an increase of forty (40%) percent, from 85,530 car loads per year to 119,710 when evaluating the cumulative impacts of all three rail lines within the community. Mitigation recommendations are included within the State of Ohio filing.

Additional evaluation by SEA is necessary to totally realize the impact within Fostoria, the Draft EIS fails to recognize that the rail systems not only intersect in the center of the community, but also have a interchange capability, both having a negative impact when considering Emergency Responders.

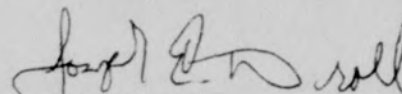
The City has participated in the preparation of the recommendations being submitted by the State of Ohio and fully concur with them.

Your consideration is greatly appreciated.

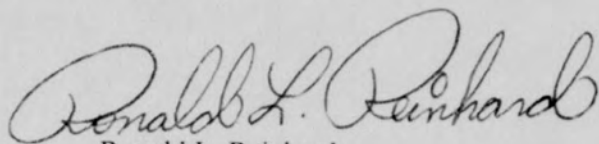
Sincerely,



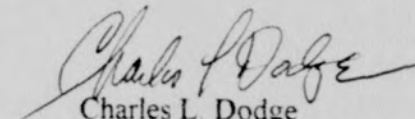
James E. Bailey
Mayor
City of Fostoria, Ohio



Joseph E. Droll
President
Fostoria City Council



Ronald L. Reinhard
Safety-Service Director
City of Fostoria, Ohio



Charles L. Dodge
Administrative Assistant to the Mayor
City of Fostoria, Ohio

STB

FD-33388

2-2-98

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ID-CITIES

ENVIRONMENTAL DOCUMENT

Schuyler County Environmental
Management Council
c/o Schuyler County Dept. of Planning
208 Broadway
Montour Falls, NY 14865
January 29, 1998

Elaine K. Kaiser
Environmental Project Director
Office of the Secretary
Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K Street NW
Washington, DC 20423-0001



Dear Ms. Kaiser,

The Schuyler County Environmental Management Council is an advisory body appointed by the County Legislature to address matters of local environmental concern. In such capacity we have received and reviewed the Draft Environmental Impact Statement, "Proposed Conrail Acquisition", Finance Docket No. 33388.

Data within this document indicates that the rail line within Schuyler County, a 15-mile piece of Segment ID# N-060 (Corning, NY - Geneva, NY), can expect a 500% increase in gross freight tonnage, should the Conrail Acquisition proceed. Although the absolute increase in the number of trains per day is small (from 0.2 to 1.6/day), this nonetheless constitutes a significant change in the status quo for our community and we wish to make known concerns that we hope can be addressed in the final draft of the impact statement. Our concerns are as follows:

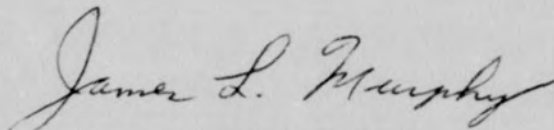
- A rural route of such limited use may not receive the necessary line upgrades expected for line segments having a comparable percent increase in tonnage but more heavily trafficked in numbers of trains per day.
- There is a large number of rural at-grade crossings whose traffic levels are below the threshold for mitigation measures as described in the impact statement. Many of these crossings occur on secondary roads leading to farms, wineries and private homes. Will our 500% increase be sufficient to result in upgraded traffic warning signals?

- Training and equipment are needed for local volunteer emergency response teams who may be required to respond to accidents involving hazardous materials. Our concern here is heightened because the rail line through our county will traverse farmland and vineyards. Responding emergency volunteers must be prepared to protect themselves and effectively contain spills of hazardous materials should they occur. To what extent would the Conrail Acquisition result in such training and equipment for our local volunteers?

There is no doubt that the increase in rail traffic as outlined in the draft statement will result in significant positive environmental impacts such as more efficient use of fossil fuels, reduced truck traffic on highways and lessened air pollution. The Schuyler County Environmental Management Council supports this change as it strives to protect our local environment from any adverse consequences resulting from this change.

We look forward to your timely response to our concerns.

Sincerely,

A handwritten signature in cursive script, reading "James L. Murphy". The signature is written in dark ink and is positioned above the printed name and title.

James L. Murphy, Chair
Project Review Committee,
Schuyler County EMC

STB

FD-33388

2-2-98

/K

ID-CITIES

ENVIRONMENTAL
DOCUMENT



January 30, 1998

Office of the Secretary
Case Control Unit
STB Finance Docket NO. 33388
Surface Transportation Board
1925 K. Street, NW
Washington, D.C. 20423-0001

Re: Finance Docket #3338-CSX and Norfolk Southern-Control and Acquisition-
Conrail: Draft Environmental Impact Statement.

The comments to the Draft EIS are submitted from the City of Wixom, Michigan. We are commenting on safety issues concerning site-specific highway/road-at-grade-crossings and hazardous materials along key routes C-220 (Holly to Wixom, MI) and C-221 (Wixom to Plymouth, MI).

Wixom is located in the western part of Oakland County. The county has had about a 10% increase in population over the last ten years. Wixom had a 34% population increase between 1990 and 1995. Population estimates from the Southeast Michigan Council of Governments projects that Wixom's population growth from 1990 - 2000 will be 57%.

In addition to the population, businesses in Wixom increased by 62 (13.25%). We expect a growth of 18.5% this year for a total of 628 businesses in the community.

In an analysis of federal railroad safety records, the Detroit News reported in their issue of December 29, 1996 that Wixom, MI had the 92nd and 213th riskiest crossings among the 163,000 public railroad crossings in the nation. We believe that most accidents are the fault of motorists and have attempted to lower the possibility of accidents through law enforcement, education and working with the local CSX representatives. We still have concerns that the consolidation of rail lines will increase rail traffic and these are not addressed in the Draft EIS.

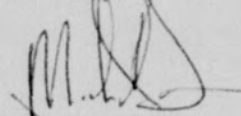
1. The first comment concerns highway/rail at-grade crossings in Wixom, MI
 - a. A Detroit News article, dated December 16, 1997, shows that the last traffic analysis of this intersection was done on January 7, 1985. The source is the Federal Railroad Administration whose database shows a daily total of 17 trains and a traffic volume of 14,700 automobiles. Traffic surveys used in a 1994 Environmental Assessment of possible changes to this intersection show a traffic count of 24,700 from data collected in 1992. The P.M. peak hour results show a total delay of 37,175 minutes with probable costs of \$2,738,225. The Level of Service (LOS) was rated as F.

- b. The Draft EIS indicates there are 12 trains per day and that there would be a negligible increase in that number but an increase in tonnage of about 20%. (Draft EIS, Attachment ES-B, page 1 of 13). There may be several reasons for the different count. One could be that the crossings are positioned close to a Bulk Intermodal Distribution Services (BIDS) yard. During switching operations, the trains either activate the road crossing signals or enter the intersection and then reverse and reenter the yard. While this may not trigger a count as a "through train," the effect of these movements is to increase the delay time and the risk of accidents.
 - c. An analysis of the crossings and a consideration of site-specific mitigation should be part of the final EIS.
2. The second area of comment is the increase of hazardous material along the two routes.
- a. Our concern is to ensure that the municipalities along the route in Oakland County are prepared to assist in and properly react to any emergency involving the hazardous materials.
 - b. In response to an accident several years ago, there was a decrease in the amount of hazardous waste shipped along the routes. We have been informally notified by local CSX officials to expect an increase in the number of trains. The estimates were for a 50% increase. This is a strong indicator that traffic is being diverted to a more northerly route to relieve congestion.

The City of Wixom acknowledges that a measurable factor of the City's growth and prosperity is due to the proximity of the railroad for our businesses, such as Ford Motor Company. We wish to continue to work with CSX to ensure that effects of the consolidation do not damage the other contributing factors to the City's prosperity.

The point of contact for the City of Wixom is Frank Sheridan, Assistant City Manager, phone is (248) 624-0894, fax is (248) 624-0863.

Sincerely,



J. Michael Dorman
City Manager

JMD/jp

Cc: Oakland County
SEMCOG

STB FD-33388 2-2-98 K / ID-CITIES

Before the
SURFACE TRANSPORTATION BOARD
Washington, D.C. 20423

**ENVIRONMENTAL
DOCUMENT**

Finance Docket No. 33388

CSX Corporation and CSX Transportation Inc.,
Norfolk Southern Corporation and
Norfolk Southern Railway Company
-- Control and Operating Leases/Agreements --
Conrail Inc. and Consolidated Rail Corporation



VERIFIED STATEMENT OF EMMANUEL ONUNWOR

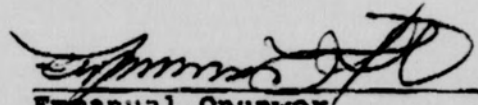
1. I am Emmanuel Onunwor, Mayor of the City of East Cleveland. I submit this verified statement on behalf of the City of East Cleveland regarding the environmental and safety effects of the above-captioned transaction.
2. We have reviewed the issues facing the City of East Cleveland as addressed in the Draft Environmental Impact Statement ("DEIS") prepared by the Section of Environmental Analysis ("SEA"). We are deeply concerned about the adverse impacts the people of the City of East Cleveland will face as a result of this transaction if proper mitigation measures are not imposed.
3. Specifically, we oppose the current DEIS and Application because they do not adequately address issues regarding safety, transportation of toxic materials and substantial increase in volume of rail traffic in and around the City of East Cleveland.
4. The people of the City of East Cleveland will experience the significant effects the City of Cleveland has described in detail in their Comments filed October 21, 1997 and in the Comments on the DEIS which they are filing today. We are working closely with the City of Cleveland to develop alternative

routing scenarios in order to diminish the environmental impacts on our residents. We, like the City of Cleveland, strongly believe that aggressive alternatives, such as re-routing trains, are necessary to avoid serious adverse impacts upon our residents. The mitigation proposed by the SEA in the DEIS is insufficient to address the environmental impacts on our residents.

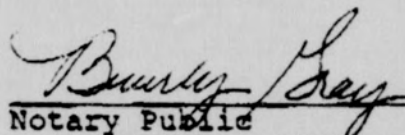
5. The City of East Cleveland, therefore, urges the SEA to reexamine the environmental impacts of the transaction upon the City of East Cleveland and the City of Cleveland. Particularly, we suggest the SEA examine alternatives, such as re-routing of trains, in order to avoid serious adverse impacts upon our residents. We are anxious to consider suggestions and recommendations, including those proposed by the City of Cleveland, that adequately address these significant issues.

VERIFICATION

I, Emmanuel Onunwor, verify under penalty of perjury that I have reviewed the foregoing Verified Statement, and that all of the facts stated therein are true and correct. Further, I certify that I am qualified and authorized to verify and file this Verified Statement. Executed on this 2nd day of February, 1998.


Emmanuel Onunwor

Subscribed and sworn to
before me this 2nd
day of February, 98.


Notary Public
BEVERLY GRAY
Notary Public, State of Ohio, Cuy. Cty.
My Commission Expires July 20, 2000
My commission expires:

July 20, 2000

STB FD-33388 2-2-98 K ID-CITIES 2 OF 2

Bergen County (and places like us across the nation) adapt our needs to the highway portions of our transportation system, our cars are overpowering the road network and threatening to suffocate the economy they started out serving. The Routes 4/17 interchange and the Model A were perfect technology companions in 1935.

II. *Since 1988* is the second "Since" theme, when Cross Acceptance One arrived on our doorsteps with some remarkable opportunities we saw and seized together, but with others more visible to us today because we can now see the outcomes of that incredible 1980's boom.

Here is a third. *Since* Cross Acceptance began in 1988, yet another transportation initiative landed in our laps -- the 1991 *Intermodal Surface Transportation Efficiency Act* of 1991, many of whose purposes for the nation's Metropolitan Areas matched those that New Jersey's State Development and Redevelopment Plan held for our own Metropolitan landscapes -- part urban, part suburban, and part rural. I S T E A.

ISTEA and Cross Acceptance II.

Because the traffic we were experiencing tied so directly to the new landscape of our economy, ISTEA said, we had to rethink transportation, as well. The new transportation system we could build *inside the one we already have (it's much too expensive to dismantle)* would have to be *Intermodal*. Then it could turn the *separate pieces* of our system back into a *network* again, each of whose parts could help and serve the others.

So while the State Plan was focusing on our *landscapes* that were being overrun, ISTEA focused on the transportation system's inadequacies *for serving these same landscapes*. ISTEA went a giant step further than had other transportation bills before it, however. It instructed us to find ways to focus on *land use while we focused on transportation*. Cross Acceptance Two gives us excellent chances to revisit and strengthen the capacity based planning perspective we invented and applied eight years ago, starting with the capacity of the land to contain the buildings that our collective zoning assigns to it.

In ISTEA, the word *Intermodal* means *among the modes*, and the "modes" include roads -- state, local, county and Interstate, and the cars, buses and trucks that converge on them; rails -- for rail transit and rail freight of the various types; airports -- for air passenger and air freight of many new types; harbors -- and their transcontinental and global freight shipping opportunities (and impediments), along with their places where freight is exchanged to other freight modes; and the whole new infrastructure of information transmission. We work in this last vineyard, as well.

ISTEA also focused on the word *Efficiency* -- among the modes, across the economy, and within the new land use settings described at the beginning of this Planning Essay. The two in combination, intermodal and efficiency, liberate terrific possibilities for setting up an *intermodal network approach* to integrated transportation investment in Bergen County.

Among other things, this Intermodal Surface Transportation Efficiency Act also seized upon extensive Circle of Mobility planning already in place in our state, and embodied its

major elements into an Urban Core that brought the Secaucus Transfer and the Hudson Bergen Light Rail Transit line to the forefront of Northern New Jersey's and Bergen County's intermodal opportunities.

Planning is first *about* something — in this case about our economy, our environment, our landscape patterns, and about the much too disparate transportation elements that cross our county from our region without connecting very well to any of our determinants of economic success. With transportation the most prominent public investment we ever make in our economy, the opportunities and obligations are large here.

Second, planning becomes *for* something. Springing from the research recounted in this Planning Essay, what recommendations for action surface? Here are ours:

FIRST: From the extensive research discussed above, we come first to the conclusion that, among the few modes remaining at our disposal for moving people across our economy's landscape, *Light Rail is the logical technology of intermodal choice*. It rises and bends, jump starts and quick-stops, glides and slides more silently and less interruptedly through our settled landscape than any of the other modes. Moreover, it can knit together our present array of passenger carrying roads and rails such that the *people who use both* can travel much more productively on *each* of them and on *both of them in various combinations*. Better than any other mode at our disposal, it can make a *network* (again) out of a disconnected entanglement.

Who knows better than those who live here that Bergen County is the place where scores of transportation investments have been made at different times and which, for today's needs, do not connect together well. Picture how Routes 4, 46, 17, 80, the Turnpike, the Parkway and our commuter rail lines appear *on a map* like they actually meet here to serve one another's purposes. But try making the connections *on the ground* to actually accomplish such miracles. In spite of this, the state's greatest economic concentration has been assembled here in Bergen County on but 3% of the state's land mass.

So hit or miss will no longer suffice. The great preponderance of our transportation analysis and investment energy since 1988 has focused on the mismatches recited throughout this Planning Essay. As pointed out above, another such mismatch is between the sheer size of the 1950's commuter rail network that passes through Bergen County and the small number of people who find productive ways to utilize the service available on it in 1997. Two percent of Bergen's residents who get up on Monday morning to go to work take the train from one of our 28 commuter rail stations. Saddle Brook is a prime example of a centrally located place, in the heart of Bergen County's economic core and at the junction of several transportation lifelines — none of them Intermodal — and that has not been able to benefit precisely because of the many disconnects. Rather, Saddle Brook and the towns adjacent endure the traffic that is led to and through this place. We have formed a multi-party partnership to tackle these issues. The goal is to add economic strength while reducing congestion.

As the technology of choice:

- Light Rail, more nimbly and with much greater flexibility than commuter rail, can respond to economic change and opportunity. That is, the economy is not

forced to adapt to IT;

- Light Rail's station sites have strong economic development and redevelopment capacity, offering excellent opportunities to the private sector and to municipalities which need to strengthen and sustain their changing economic base;

With its service/information economic base already in place, Light Rail offers more powerful connective support than any other mode for businesses and residents alike;

- Light Rail permits small stations to be added without large parking lots;
- The Light Rail system is easily expandable. It can start with one-car trains and expand to two and three car trains as the market grows;
- Light Rail's quick starts and stops do not create congestion at the center of the towns it passes through;
- Through feeder bus or feeder van loops, known to be effective with Light Rail, ridership can be increased and service areas expanded;
- An eventual interconnection with the West Shore at the Vince Lombardi Park-Ride would offer excellent potential access from the north to the Hackensack Meadowlands, the Sports Complex, and the Secaucus Transfer/Allied Junction site; and,
- Light Rail, with its 12 minute service frequencies all day long, is capable of competing with the automobile in convenience and speed. It will also provide greater reliability of travel times, for our business and residents, than do our cars so often trapped in traffic with no escape.

SECOND: Our greatest transportation needs, for both roads and rails, are for much improved EAST-WEST capabilities that tap into, protect and sustain the prodigious economic asset base in the County's Core.

The Bergen Cross County Light Rail line, running parallel to Routes 80, 4 and 46, can both rescue the core of Bergen County's economy -- the county's largest concentration in the state's largest economic stronghold -- and stimulate greater economic strength, staying power and redevelopment opportunities keyed to transit friendly land use choices. The days when we can reach onto the shelf for congestion-generating, auto dependent uses in such crowded landscapes are numbered and counterproductive.

Neither of the two lines under consideration for selection as the first operable segment in the Major Investment study being jointly conducted by New Jersey Transit and Bergen County can accomplish this. They both run north-south; neither contains the sheer volume

of economic assets so vital to the entire county's economic future; and neither makes connectable contact with so many of the county's and the region's transportation lifelines. *Both, however, are and will be needed in the intermodal transportation network of transportation network of our economic future, and both can connect into the intermodal spine that the Cross County Light Rail line would provide.* This is to day that Bergen County has largely lived off of the transportation investments in place in the 1950s, as has our region with its huge increases in regional travelers who use and depend on these same lifelines.

THIRD: This Planning Essay also shows how the Core of Bergen's economy -- the state's most concentrated such place -- is also where the worst of our congestion can be found. It is also the place, however, where our best transportation opportunities reside, because *here is where our transportation links to our region also converge with the best opportunities for interlinkage.* The Hudson Bergen Light Rail streams northward to us from Hudson County, with a key intermodal link in Weehawken from and to New York City. It will carry regional and local travelers to and from economic destinations very attractive to us, and that make us very attractive to them. Bergen and Hudson hold 700,000 jobs between them; *this represents one fifth of all the jobs in New Jersey.*

FOURTH: The Bergen Cross County Rail line, better and sooner than can either of the two other lines under study, "pulls together" the major strands of the transportation network strategy we have been pursuing for eight years since Cross Acceptance One. As described above, these include the Routes 4/17 interchange, designed to permit much easier capacities for drivers to change directions, the Secaucus Transfer with its potential to connect to 100 commuter rail stations in our region as parking and reverse commuting capabilities are established, and the Hudson Bergen Light Rail Transit line with its enormous inter-regional and intermodal opportunities. Without the Cross County, however, the Vince Lombardi is only a place from which to take a cab, after being dropped off by the Hudson Bergen, to one of Bergen's 550,000 job opportunities.

FIFTH: Better than can either of the other two lines under examination in the Major Investment Study, the Bergen Cross County Light Rail line makes possible the delivery of thousands of new passengers/customers from Bergen County's 848,000 population base, the state's largest, to the New York Waterway Ferry at Port Imperial in Weehawken. Used "in reverse" -- we used to call this "cross commuting" before travel in the service/information economy became so multi-directional -- the Cross County also enables the delivery, via the Hudson Bergen Light Rail line, of thousands of additional Hudson Bergen riders to Bergen's 550,000 job base from work force strongholds in Hudson County, Manhattan, and Newark. Today's congestion on major and "minor" highways, including the narrow, two mile, two lane strand called River Road on north Hudson's waterfront, make this impossible to accomplish.

Through well chosen interconnections, we can *strengthen our roads by strengthening our transit services.* Intermodal Surface Transportation Efficiency Act. As well, this Planning Essay shows how the Core of our economy is also where our best transportation opportunities reside, because *here is where the strongest transportation links to our region also converge with the best opportunities for interlinkage.*

The results from our nine years of research since 1988, including the most recent of our rail analyses conducted by investing \$1.5 million in county dollars into Fatal Flaw engineering and environmental analysis, show us the Cross County Line's unmatched integrative capacity to bring the three major investments described above together such that a network is re-established here.

SIXTH: Once we saw this potential for the Cross County line, we invested \$1.5 million in county dollars to put its possibilities to a series of feasibility tests. What bridges could block our way? Did existing freight travel close out our Light Rail possibilities on the portion of the Susquehanna and Western from which this service could be extracted? Did we have to go into the Vince Lombardi Park Ride — with its daunting wetland problems and high structure costs — in order to get started? Were there other environmental puzzles that could turn this into a typical, multi-year marathon? Would Light Rail have to travel on local streets? Could it occupy a right of way that would not tie up traffic in the center of towns along its path? Could it curve and bend over and around other major obstacles in its path (existing rail yards, for example)? Would it require new bridges with their typical delays and perplexing permit tangles? Could it merge seamlessly with the Hudson Bergen without disrupting in any way the impressive results of its Final Environmental Impact Statement already in hand?

Wherever any potential impediments were encountered in our engineering analyses, each and every one was solved.

SEVENTH: Using completely integrated, high speed, 12 minute frequency service all day long, the Bergen Cross County Light Rail line, in combination with the Hudson Bergen Light Rail, will also link all of these economic assets to Hoboken with its intermodal exchanges to PATH east to downtown Manhattan and west to Journal Square and Newark, and to the southern Jersey City waterfront with the same intermodal choices east and west bound, and as well, to Bayonne. All of these destinations are multi-directional and reverse linked as well. The West Shore and the Northern Branch lines can contribute in these ways, but not to the extent that the Cross County can.

So in its county-wide anti-congestion, economic strengthening, and inter-regional and intermodal connecting capacities, the Bergen Cross County Light Rail line's east-west linkage to the Hudson Bergen Light Rail Line offers the greatest mobility and benefit mix among the three lines under study in the NJ Transit/Bergen County Major Investment Study partnership. Its role as an integrative spine, however, offers strong opportunities, as well, for the West Shore and the Northern Branch as north-south connectors to the entire regional transit network now coming our way. As the work already completed to date shows, a solid variety of connecting possibilities is coming into focus. For some examples:

- As Light Rail, the Northern Branch could slip easily and seamlessly into the Hudson Bergen Light Rail line;
- The same is possible for the West Shore via an achievable link to the Cross County line in Ridgefield Park where, literally, one station could serve both lines and, for whoever needed them, offer transfers between them;

- The Vince Lombardi hub could also offer the West Shore line a commuter rail link southward to the Hackensack Meadowlands, the Sports Complex, the Secaucus Transfer/Allied Junction station, and Hoboken;
- There may also be opportunities, not yet examined in detail, that could offer both the West Shore and the Northern Branch, through the utilization of Multiple Unit Light Rail Vehicles, compatible access to both the Weehawken Tunnel and the Secaucus Transfer using trackage along the west side of the Palisades;
- It would be possible as well, for both the West Shore and the Northern Branch to start up Light Rail service at their southern ends where job opportunities, residential concentrations and congestion levels are highest, with stations added northward as passenger market conditions and transit friendly land use beckoned; and,
- Were commuter rail to emerge as the rail technology of choice for either the West Shore or the Northern Branch, the information available in the Major Investment Study to date suggests that this service would likely have to originate in Rockland County.

Several regional maps are incorporated into this document which show where and how all of these interconnections are located and can function in integrated fashion. And all of these travel opportunities *will grow more valuable and will gain higher and higher use as our highway network, formerly the key to this portion of our region's economic success but now largely maxed out in its possibilities, grows more congested as the outer region around this inner region grows and expands.* So these strategies are focused jointly on protecting and sustaining the region's center.

As the many costs of operating densely settled landscapes rise, attacking congestion involves more than modeling, inventorying and counting the traffic. We have certainly done that here as prelude. It also involves understanding the new congestion's new economic, demographic and land settlement determinants. They, too, have been investigated on the way to making the recommendations you see here.

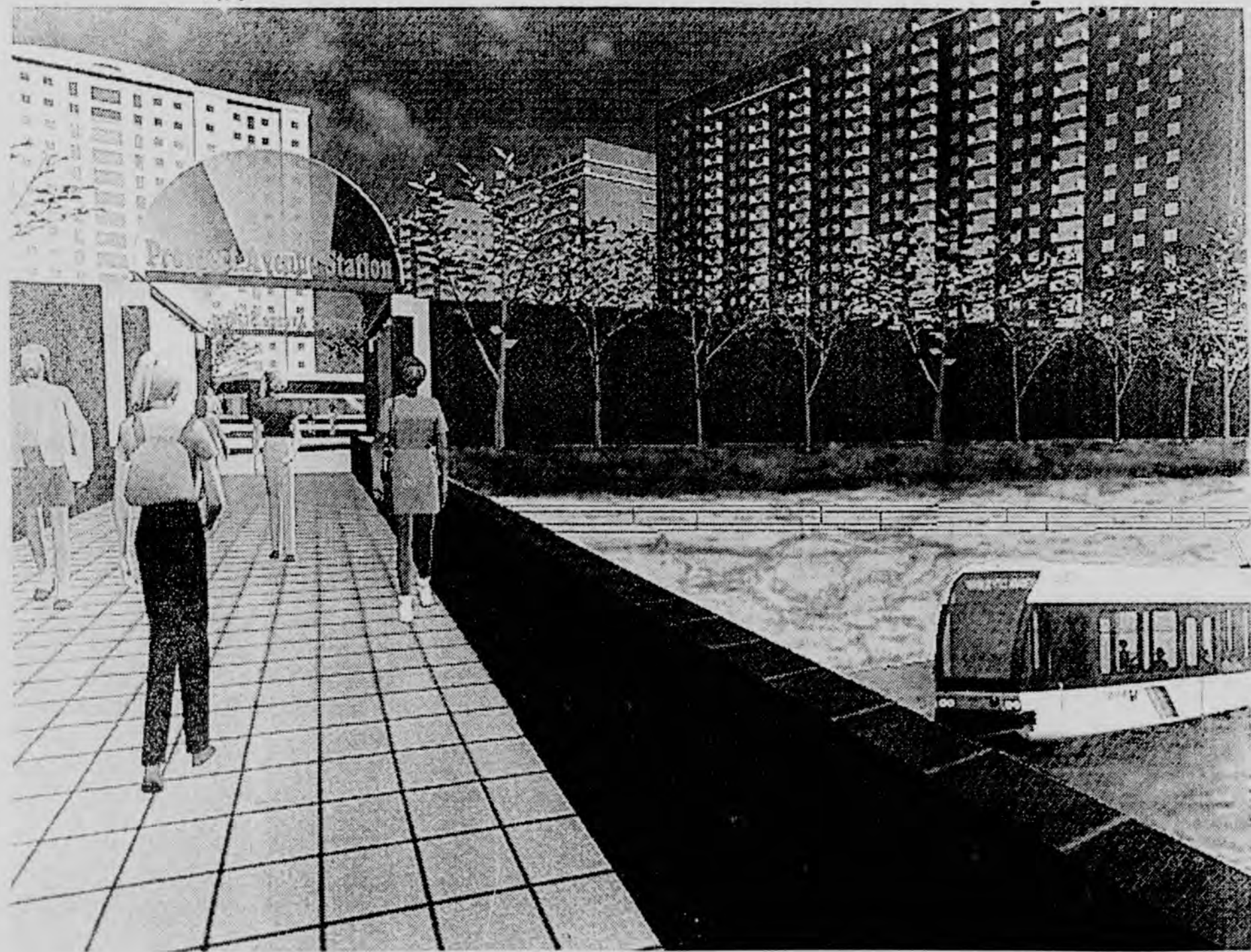
The twin ideas that new roads generate more traffic and that new ratable pay the costs of dealing with it are too dismissive on their face for the hard thinking we have ahead of us. Women didn't enter the work force in droves in the 1980s because roads were built. Transit, too, provides new opportunities for its new users. So do new restaurants, new jobs and day care centers. Are we to avoid all of these in the name of avoiding the symptoms of the transportation pickle we are in? The pickle we're in covers 40 years of growing in new ways and at unprecedented speed without giving enough thought to the transportation consequences.

In Bergen County, where location, location, and location have earned us a traffic jam, it's clear that Light Rail transit carefully chosen and carefully captured in its opportunities is now the prime remedy of choice. It doesn't end there, however. ISTE and the State Development and REDEVELOPMENT Plan are a couple of pretty good dance partners for

the Cross Acceptance work ahead of us. *Transit friendly land use can be pursued very profitably in this setting.* Matching the two to other infrastructure scales, like sewers and water supply, is a pretty good idea, too. At the base of these questions is one we asked each other in 1988: What does the zoning of available land and redevelopable land portend for the infrastructure systems that help deliver us or deny us a quality of life?

The "re-words" will also come into play in the planning that we are all called upon to consider doing next — words like redevelopment, re-use, rethinking, recreating, and remembering. Redevelopment, for example, need not only be about bigger or better buildings on land cleared of their former structures. It can also be about recouping open spaces, at those wonderful smaller scales at we also know how to work, and that also got overlooked in the eight business cycles we experienced since World War II. Redevelopment *this time around* can and ought to be about how we can link together the land use friendly transit on our near horizon with transit friendly land use ideas. The way land is developed next will be central to how well these new transportation network improvements, should we be fortunate and passionate enough to get them funded, can last and can serve us.

We will be suggesting some approaches to redevelopment in these contexts at the Cross Acceptance regional meetings coming up.



STB FD-33388 2-2-98

K ID-CITIES 1 OF 2



COUNTY OF BERGEN

Administration Building • Court Plaza South • 21 Main St. • Room 300E • Hackensack, N.J. 07601-7000
(201) 646-3630

William P. Schuber
County Executive

ENVIRONMENTAL
DOCUMENT



January 30, 1998

Office of the Secretary
Case Control Unit
Surface Transportation Board
1925 K Street NW
Washington, DC 20423-0001

Attn.: Ms. Elaine K. Kaiser, Environmental Project Director

Re: Finance Docket No. 33388

Dear Ms. Kaiser:

According to the National Ambient Air Quality Standards(NAAQS) set by the Clean Air Act Amendments(CAAA), Bergen County, NJ is designated as severe non-attainment for both Ozone and CO. A major objective of the County is to achieve healthful levels of air quality to both improve the quality of life for Bergen County residents and advance the important goals of the CAAA. The County has recently reviewed the Draft Environmental Impact Statement (DEIS) for the "Proposed Conrail Acquisition." We are taking this opportunity to comment on two issues.

After reviewing the New Jersey section of *Volume 3b: State Settings, Impacts and Proposed Mitigation* we concluded that section 5-NJ9 New Jersey Air Quality could be violating the General Conformity Rule. The General Conformity Rule was established in response to Section 176 of the CAAA. The General Conformity rule includes emissions thresholds. If they are exceeded by any Federal action, the General Conformity Rule is triggered. For Bergen County, a severe non-attainment area, any action that emits more than 25 tons of NO_x annually, triggers the General Conformity rule. For Bergen County an increase in 208 tons of NO_x annually will occur as a result of the Conrail acquisition.

Ms. Elaine K. Kaiser
January 30, 1998
Page 2

For Bergen County with a population of 848,000 and a private sector workforce of 420,000, any increase in harmful pollutants - such as NO_x will be felt by our residents and workers.

After reviewing the New Jersey section of *Volume 3b: State Settings, Impacts and Proposed Mitigation* we concluded that section 5-NJ9 New Jersey Air Quality could be violating the General Conformity Rule. The General Conformity Rule was established in response to Section 176 of the CAAA. The General Conformity rule includes emissions thresholds. If these thresholds are exceeded by any Federal action, the General Conformity Rule is triggered. For Bergen County, a severe non-attainment area, any action that emits more than 25 tons of NO_x annually triggers the General Conformity rule. For Bergen County an increase in 208 tons of NO_x annually will occur as a result of the Conrail acquisition.

Additionally, the rule indicates that an emissions off-set must occur within the same non-attainment area that the increase occurred. The way the analysis is presented in the DEIS, it looks like they used the entire 26 state acquisition area to calculate the emissions off-set. This seems to be in direct violation of the General Conformity Rule.

Issue 2: the Economy

Our second major area of concern relates to Bergen County's transportation capacity to move people and goods, by road and rail, both within our highly congested landscape and between it and the region surrounding us at all compass points.

As described in detail in the enclosed Planning Essay, our six-year analysis of our economy and its transportation assets has produced the following conclusions. All are discussed in detail in our Planning Essay, enclosed.

Bergen County is New Jersey's economic engine. Inside our boundaries on but 3% of the state's land mass are found the state's highest and densest concentrations of population, people in the work force, number of businesses, number of jobs -- all generating the states highest total value of real estate, its highest total of state income tax dollars, and total of retail sales tax dollars.

Further, the great preponderance of this economic power is squeezed into 40% of our county's land mass. Shown on Figure 28 of the Planning Essay, that core is also the place where the county's highest levels of congestion are

concentrated. This congestion relates not only to the concentration of economic assets just described, but to the fact that the preponderant volumes of regional

Ms. Elaine K. Kaiser

January 30, 1998

Page 3

traffic we experience also travel the regional roads that cross that core. Figure 26 shows that the number of trips taken within the county's economic core each day is three times larger than the number in the balance of the county.

Our research also reveals the near impossibility of expanding existing road and bus capacity to sustain the core's present economic strength into the future. Therefore new rail transit capacity has become absolutely essential. Three critical rail lines cross that core -- the Susquehanna and Western, the West Shore and the Northern Branch. All three were examined in detail in the Planning Essay, and all three offer important rail transit opportunities. *We are concerned that the large increases in freight traffic contemplated in the Impact Assessment will also generate the capacity to undercut our direly needed rail transit relief.*

Of these three corridors, however, one -- *the Susquehanna and Western carrying Light Rail eastward from the I-80's junction with the Garden State Parkway* -- best addresses the following critical economic conditions. Of the three rail corridors, the Susquehanna and Western contains:

- o 48% of the population found in all three;
- o 61% of the employment found in all three;
- o 51% of all the households found in all three;
- o 45% of the real estate value found in all three;
- o 64% of the office space found in all three;
- o 51% of all work trips taken each day in all three.

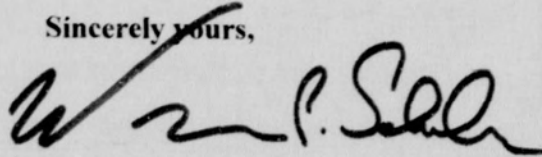
As well, the work trips taken inside the Susquehanna corridor are 51% higher in number than those taken in the other two corridors combined.

In sum, then, both areas of our concern -- air quality and economic -- are important to our county's capacity to continue to serve the key roles it plays in our metropolitan region and state.

We stand ready to discuss any of these issues with you.

Ms. Elaine K. Kaiser
January 30, 1998
Page 4

Sincerely yours,

A handwritten signature in black ink, appearing to read 'W. P. Schuber', written over the typed name.

William "Pat" Schuber
Bergen County Executive

/cm

enclosure: *Planning Essay*

**Bergen County Department of Planning and Economic Development
1997 State Development and Redevelopment Plan
Cross Acceptance Planning Essay**

Back in 1988, Bergen County and its 70 municipalities conducted a "Cross Acceptance" process as our substantial input to the new State Development and Redevelopment Plan as drafted for our response. Over a 14 month period, we held 210 meetings with you, and several other joint sessions among municipal and business leaders. To help guide our deliberations, we also shared a "straw poll" with each other that took the temperature of our planning sentiments, preferences and needs.

In the heat of what would turn out to be an unprecedented burst of growth in our county's and state's history, we invented, together, a *capacity based approach to planning* – the first attempted in our state. It was designed to anticipate future growth in Bergen County by measuring, together, how much open land remained to be developed according to the zoning in place in each municipality.

With each municipal delegation, we also took a crack at a "20 year capital plan" – another first – in which we estimated together, using cost criteria culled from conversations with municipal engineers and public works managers, such municipal items as fire engines, back hoes, ambulances, street maintenance, replacing roofs on public buildings and the like.

We also made lists, together, of what we called "environmental treasures" that our sentiments told us to try to protect, if only ways to do this could be mustered as our landscapes were crowding while filling in and closing in. We could see redevelopment already taking hold, popping up lot by lot, often in the form of large houses rebuilt in place next to small ones. We knew it would take new zoning and planning tools to keep the best pockets remaining in our natural landscapes, to find ways to capture the redevelopment phases instead of being captured and that it would be expensive to buy land in the path of development driving up acquisition costs.

These data became a supplement to the already prodigious body of information describing each of our county's six, planning "subregions" over time in our traditional and detailed, yearly Bergen County Data Books.

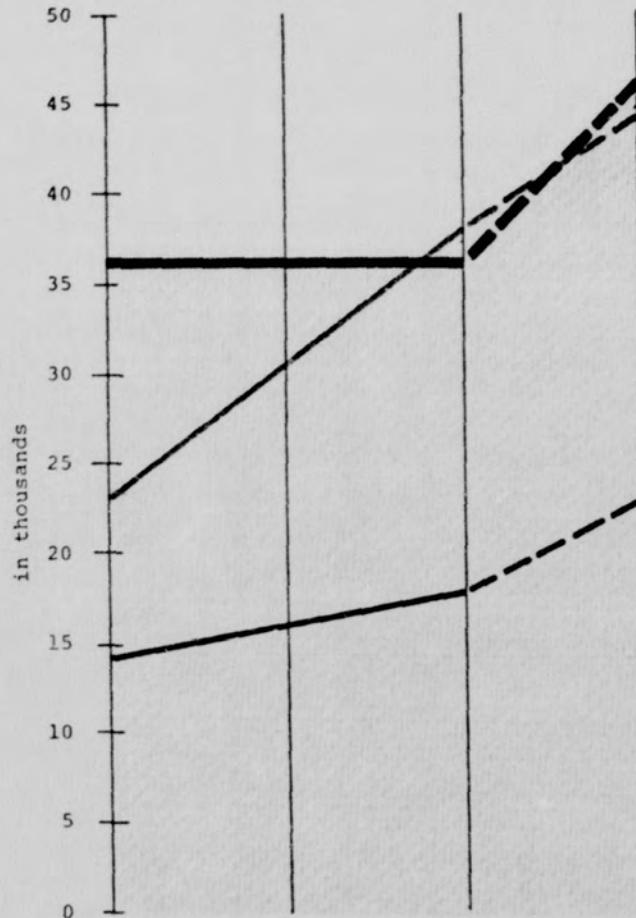
From that effort, Figures 1 and 2, on the following pages and sampled from Volume II of our 1989 Cross Acceptance Report, show Hackensack's land capacity for population and employment growth as estimated then, along with the total of such samplings for all 14 municipalities in its Central Bergen subregion. These would become known as the "pink charts."

This is a Planning Essay, similar in form to the one we wrote back in 1988 at the beginning of that Cross Acceptance effort. From our discussions, it became part of the Introduction to the Report we wrote back then. *Its purpose here is to show how and where we have sustained and expanded this capacity based approach to planning since then.* So this chance to revisit and update the New Jersey State Development and Redevelopment Plan provides an excellent

Figure 1.

Hackensack

GROWTH CAPACITY	1970	1980	1987	2010	GROWTH 1987-2010
POPULATION	36,008	36,039	35,954	46,125	10,171
HOUSING UNITS	13,915	16,304	17,578	22,500	4,922
EMPLOYMENT	23,008	30,311	36,198	45,000	8,802



Development Applications in Bergen County	Approved 1975-1989	Pending May 1989
MULTI-FAMILY & TOWNHOUSE: Individual Dwellings	2,821	334
COMMERCIAL, RETAIL, HOTELS: Sq. ft.	975,356	94,348
OFFICE: : Sq. ft.	1,517,021	145,749
INDUSTRIAL & WAREHOUSING: Sq. ft.	541,017	33,224
TOTAL NEW SQUARE FOOTAGE FOR ALL USES, Including residential & public facilities	6,984,556	731,020

POPULATION
 HOUSING UNITS
 EMPLOYMENT

Figure 2.

GROWTH CAPACITY 1970

1980

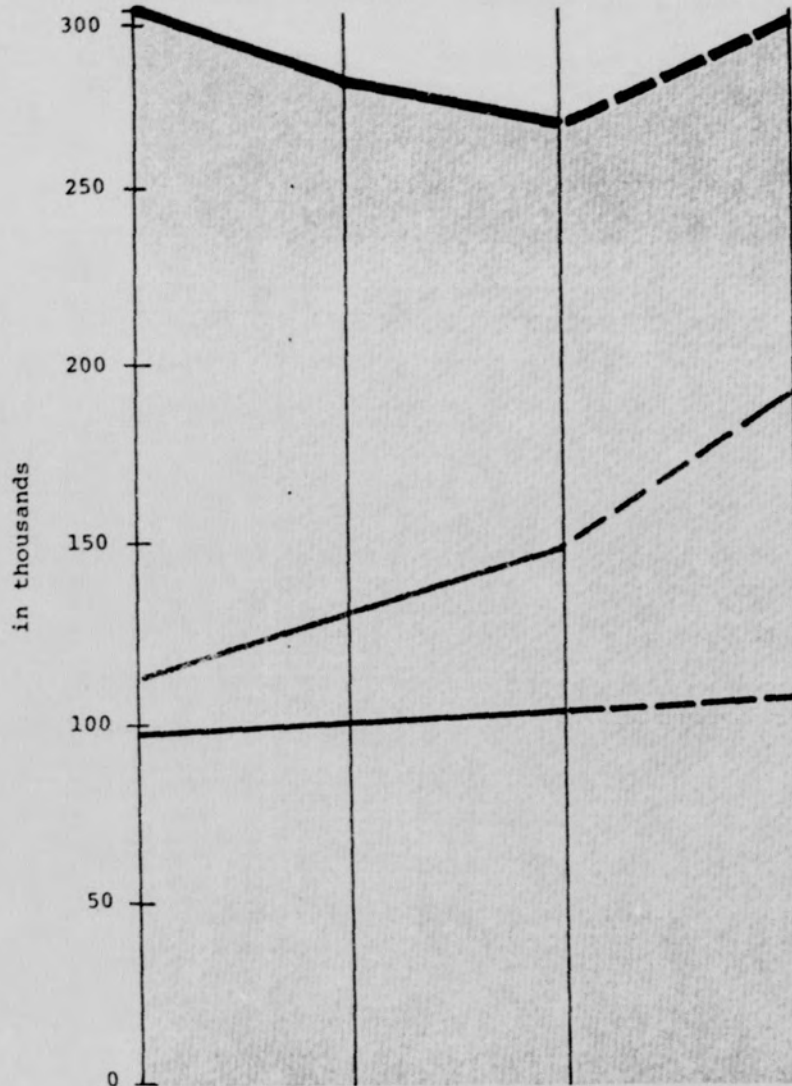
1987

2010

1987-2010

Central Bergen

POPULATION	304,494	277,456	268,046	297,645	29,599
HOUSING UNITS	97,890	103,012	106,012	118,675	12,663
EMPLOYMENT	112,177	130,362	150,698	187,275	36,577



	Approved 1975-1989	* Pending May 1989
Multi-Family and Townhouse: Individual Units	4,610	598
Commercial Retail, Hotel : Sq. ft.	4,164,939	375,970
Office : Sq. ft.	9,243,338	1,039,605
Industrial and Warehouse : Sq. ft.	3,565,162	241,379
Total New Square Footage for All Uses Including Residential and Public Facilities	23,413,125	2,629,262

POPULATION
 HOUSING UNITS
 EMPLOYMENT

Figure 3.

BERGEN COUNTY SECTORS



opportunity for us to revisit these topics over the next few months.

This 1997 essay opens with many of the insights from our County's first Cross Acceptance Report to the State in 1989. It outlined the emergence of suburban counties in major metropolitan areas as the major locus of the US economy. Coming at the end of the "go-go-1980s" Bergen County's response was dominated by a concern with the "consequences" of this growth on our scarce infrastructural and environmental capacity. So, in a straw poll conducted with our mayors and planning board member in each one of our 70 municipalities we identified major concerns with:

- Environmental Planning and loss of open space (71%);
- Traffic congestion (90%), especially the potential impact of opening I-287 on northwest Bergen; and
- Fiscal capacity to pay for growth (82%) as the supply of vacant developable land began to dry up.

Yet, almost while we were working, New Jersey entered a period that turned out to be the most profound economic recession since the Great Depression of the 1930s. Many of the service sector jobs created during the 1980s were lost, compounding the effects of a shrinking manufacturing base. Although New Jersey is still in a long economic expansion and has regained the same number of jobs back, they are different in nature. So, today, we face the challenges of sustaining economic performance in New Jersey's single largest economy while erecting the land use and infrastructure foundation for the 21st Century economy.

This draft essay also expands the framework established in Cross Acceptance-1988 to take into account the new economic, land use and transportation investment context that has emerged more clearly since then, and particularly how this new context is reflected in several new transportation initiatives we have taken since then in response.

Planning Context 1997. Some of it is the same. And some has changed. The Future Isn't
What It Used To Be.

Forty years ago, little more than a generation, Bergen County and our geographic counterparts in metropolitan areas across the nation were predominantly low-density suburban, cradled in pleasant natural settings, and growing energetically. The nation's economy was expanding on a strong industrial base, its big cities were places of manufacture and trade, freight moved predominantly by rail, open land was referred to as "undeveloped," and an airplane trip was a big adventure.

Most all commuting occurred *between suburbs and cities* and *within cities*, families were "headed" by a father who worked and nurtured by a mother who stayed home, and big stores, called "department stores," were a relatively quick trip to the city away (the mall had not yet been invented). The big Interstate Highways were under construction but not yet in use. "Someday," people said, "when all this construction is over with, we'll be able to drive all the way from Boston to San Francisco without hitting one traffic light." Imagine.

And oh yes, back then "country" air was "fresh," drinking water was clean and plentiful, abundant land was over the next ridge, poison ivy, treated with calamine lotion, was what you got while playing in vacant lots and nearby woods, and Norman Rockwell was memorializing all these vignettes in the Saturday Evening Post.

Can this snapshot of an economic past be only a generation removed from the plans we now set out to make? *Yes it can.* For momentous changes over the intervening 40 years *have made the future for today's parents something it didn't used to be for theirs.* Put most simply, and still surprising to many in the enormity of its dimensions, the nation's economic geography — where we place our buildings and the roads, rails, pipes and wires to support them — has changed steadily into something remarkably different from what it used to be. So have our lives.



Looking back, and assisted mightily by a broad body of new information, we can now see post-World War II New Jersey in new retrospect. We were, indeed, growing rapidly into a collection of "bedroom" suburbs and small cities just a short drive to the two large cities just beyond our borders. (People still repeated Ben Franklin's quip that New Jersey was a "keg tapped at both ends.") The same land pattern characterized many other such places across the nation. Spurred by returning soldiers starting families, and by federally supported home mortgages, then by sewers, and then by revenue sharing dollars to local governments, our state's economy bounded ever more exuberantly into the countryside. Bergen County grew more and it grew faster than any county in New Jersey, and among the fastest in the nation.

A powerful new idea started to take hold — that this kind of growth opportunity would have tremendous staying power, and even that its capacity to create new wealth to divide up was becoming a "tide to lift all boats". It might even bless generations yet to come with higher standards of living than their parents had had. The words "A New American Century" crept into the language. "If we can go to the moon," people said more frequently, "why can't we" (you fill in the blank).

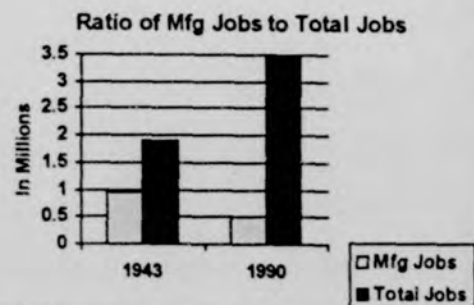
Across the country in places like ours, population and employment forecasts were nearly impossible to make. Schools were built and filled in waves. As all these new families grew, the many segments of the economy grew to meet, absorb and incorporate them into it. Somewhere along the line, the kids would come to be called Baby Boomers. Hula Hoops. Woodstock. Employment. Life Insurance. With the first of the Boomers having reached age 50 on January 1, 1996, pensions and social security are next.

The State Plan and the Emergence of a Suburban Economy, 1950-1990: Three Trends.

The first round of "Cross Acceptance" in 1988 occurred against the backdrop of major structural shifts in the US economy. These were the outcome of *three national trends, each with its own momentum but with their collective effects awesome in combination, that came to dominate a rapidly changing economic landscape.* Over these last 40 years:

- The nation's job base has been shifting inexorably from manufacturing to services. In 1943, New Jersey's manufacturing jobs numbered 961,200, our high water mark, and constituted 55.4% of the state's employment base. By 1990, two huge shifts had occurred. Total manufacturing jobs statewide *had decreased by almost half* (to 500,000), and service jobs had grown so rapidly that manufacturing's share of total employment inside our state's borders

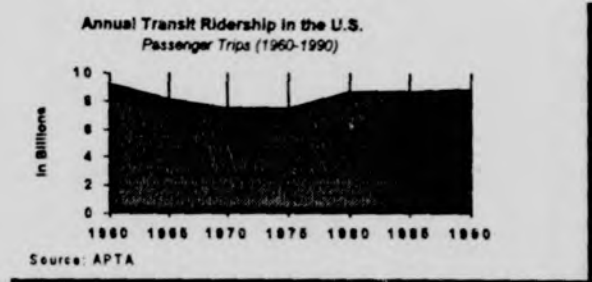
had dropped steadily *from one out of every two jobs to one in seven.*



- As the national economy grew to absorb the Baby Boom's unprecedented numbers, *both jobs and population were moving to and growing side by side within suburbs* in such increasing numbers that a land use and nationwide economic revolution has become the cumulative effect. The Interstate Highway system did get to San Francisco from Boston, but its second phase of "rings," built outside the cities within the nation's metropolitan areas (Rte. 495 outside Boston, Rtes. 287 and 295 around Trenton, etc.), ended up feeding the suburban land use revolution.

Our New Jersey Turnpike and Garden State Parkway run pretty much north – south, but, today, the majority of their daily users are not traveling from New York to Philadelphia. They carry north-south and east-west regional and local travelers who jump on and off to get to hundreds and hundreds of disparate destinations. To illustrate these changed patterns, Bergen County gathers 200,000 of its daily work force of 550,000 from 330 municipalities outside Bergen and in four states. The Ben Franklin anecdote died along the way to this momentous change.

- And American as apple pie, the car would become how 85% of our much larger work force now commutes – *now mostly between suburban homes and suburban jobs* rather than between suburbs and cities or within cities. *While the total number of Americans who take transit to work has grown hardly at all over this entire, 37 year period, the number who now work has more than quintupled.*



The consequences of three trends merged to create a massive new land form called the "metropolitan area" — offering yet another new word for planners to use. They also became the basis for new formulas for the Federal Government to use in distributing and redistributing the nation's wealth. In great surges and migrations of population and employment, the largest of these metropolitan areas formed and grew outward from the country's rims — on our East and West coasts, and along the shores of the Great Lakes and the Gulf of Mexico.

Back in the 1960s, the Interstate Highways were popping up all over the country. But their consequences for land development had not yet taken hold. The economy and its transportation support systems, and the land settlement patterns that are the consequences of both in combination, were focused predominantly at the region's center. All three were centralized. The further one traveled from the center, the lower the population densities and the more rural the landscapes became. Transportation, with common and central destinations, could pursue economies of scale with considerable efficiency and ease of choice.

But note these statistics: While New Jersey was losing 850,000 acres of farmland between 1950 and 1990, the entire state was gaining 2.7 million in population, and 1.7 million in jobs. And Newark, our largest city, was experiencing a population loss of 163,555 (from 438,776 to 275,221); and a job loss of 83,915 (from 201,067 to 117,152). Newark's 1950 total was 14.8% of all jobs in New Jersey; by 1990, it represented 3.9%. Our state's remaining five largest cities (Jersey City, Camden, Paterson, Trenton and Elizabeth) saw their combined employment drop by 170,120, from 274,559 in 1950 to 188,354 in 1990.

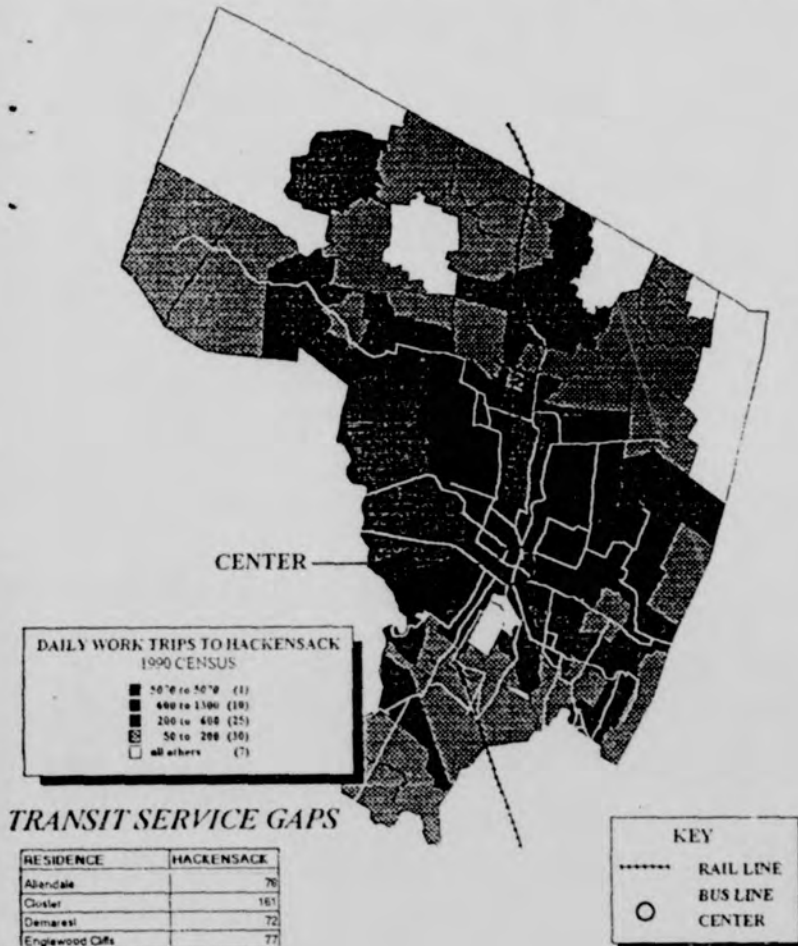
The biggest surprise has been that, of the two reciprocally pulsing expansions of population and of jobs, the relocation of *where business is conducted* has had much the more telling effects on the new suburban futures we were inventing back then in the 1950s and 1960s with such gusto. Companies to which employees had traveled to center cities were deciding *not to stay put*. In a growing swarm, they were choosing, instead, to *pick up and move to where the expanding numbers of their customers were choosing to live*. (See Figure 4 on the next page.)

Entrepreneurs from the retail sector became the first of many to respond to this rising suburban market. Alexander's was the first free-standing mall built in the United States, landing in 1957 as if dropped by helicopter onto Paramus' smooth flowing, largely local Routes 4/17 interchange. The new store had a big parking lot easy to get to. *Who would have pictured here the nation's mightiest retail concentration 20 years later?* And its multi-purpose,

Figure 4.

HACKENSACK COMMUTERSHED'S TRANSIT OPTIONS

Bergen County residents who work in Hackensack live in these towns.



TRANSIT SERVICE GAPS

RESIDENCE	HACKENSACK
Alendale	76
Cluster	161
Demarest	72
Englewood Cliffs	77
Franklin Lakes	146
Glen Rock	229
Hamington Park	54
Haworth	88
Hillside	226
Hoboken	55
Montvale	97
Northvale	79
Nonwood	92
Oakland	149
Old Tappan	43
Park Ridge	69
Ramsey	216
River Vale	233
Saddle River	48
Tenafly	242
Upper Saddle River	167
Waldeck	159
Washington Township	194
Woodcliff Lake	82

COMMUTERSHED

RESIDENCE	HACKENSACK
TOTAL BERGEN	29611
Hackensack	6070
Teaneck	1254
Lodi	877
Bergenfield	782
Englewood	699
New Milford	685
Paramus	673
Maywood	629
Bogota	612
Garfield	606
Dumont	604
Far Lawn	542
Little Ferry	526
Ridgewood Park	518
River Edge	486
Hazbrouck Heights	464
Parkside Park	429
Fort Lee	397
Cliffside Park	382
Saddle Brook	377
Elmwood Park	369
Ridgewood	359
Oradell	319
Rutherford	310
Wallington	250
Fairview	243
Tenafly	242
Westwood	240
Wyckoff	240
River Vale	233
Glen Rock	229
Rochelle Park	226
Hillside	226
Ramsey	216
Woodcliff Lake	194
Washington Township	194
Upper Saddle River	167
Cluster	161
Waldeck	159
Ridgewood	151
Oakland	149
Carlsbad	147
Franklin Lakes	146
Emerson	136
Leonia	129
Lynhurst	122
Edgewater	114
Montvale	97
Moonsachie	96
Nonwood	92
East Rutherford	88
Haworth	88
Woodcliff Lake	82
Cresskill	81
Northvale	79
Alendale	76
Englewood Cliffs	77
Midland Park	75
Demarest	72
Park Ridge	69
North Arlington	68
Hoboken	55
Hamington Park	54
Saddle River	48
Old Tappan	43

BUS SERVICE: HACKENSACK EMPLOYMENT CENTER

Name	AMPeakHwy	ORPeakHwy	PMPeakHwy	LOSPeak	LOSOPeak	LOSOneWay
165A16	15	20	15	I	I	I
158B1	6	0	5	#	#	#
108D1	12	0	20	I	#	#
178A16	30	30	30	#	I	I
182A16	15	60	20	I	I	I
712A16	30	60	30	#	I	I
75LA16	15	30	20	I	I	I
76MA1	40	0	60	#	#	#
76KA1	25	0	30	I	#	#
77GA16	20	30	20	I	I	I
83A16	15	40	20	I	I	I
812A16	60	60	60	#	I	I

KEY: TRANSIT LEVELS OF SERVICE

Service	LOS_I	LOS_II	LOS_III
AM Peak	0-25 minutes	30-45 minutes	60+ minutes
PM Peak	0-25 minutes	30-45 minutes	60+ minutes
Off Peak	0-60 minutes	60+ minutes	No Service
One Way	Both Ways	Not Applicable	One Way to NYC

multi-directional, all day, *regional* traffic jam.

Just outside Boston, a rube back then in 1957's Massachusetts was someone who still thought Jordan Marsh was a swamp. Becoming famous in suburb talk the nation over were the new subdivisions named for the ecosystems they were displacing. Hickory Acres.

As the full dimensions of this population and real estate explosion became visible — 76 million children were born between 1946 and 1964, comprising the largest such event in our history — other businesses picked up and followed the retail pioneers in ever more expansive waves. Still other start-up companies chose this expanding suburban market. They all saw this rising tide of new residents as not only constituting a new and rapidly expanding *customer base*. It would become their new *work force*, as well. *And as the baby boomers have grown up and entered the work force, most have chosen to live, work, and then to start families in the suburbs as their parents had done. Their children are now doing the same.*

Meanwhile, the suburban schools built to accommodate all these new families became magnets for more homeowners, helping to drive upward the new spirals of real estate development. The people who were building the new stores and homes in farm and wood lots would become known as "real estate developers." Those that inhabited them would become the economy.

To accommodate these surges, zoning was re-invented by municipal leaders, in ever more ingenious ways, to "attract" the "best" mix of burgeoning opportunities that each town decided it wanted to assemble. Jeffersonian democracy in action. Some got their way — particularly in places where the booming markets were strongest. Others didn't. Rural towns engaged in the very same exercise, but fewer things came their way — to start with.

The Federal Government, urging each municipality to fashion its own menu of residential and commercial "sectors," sweetened the advice by sending money to each town to do its own "Master Plan" to shape its own destiny. To read those master plans today is to discover that they all looked and sounded pretty much alike. They are probably part of the origin of the term "cookie cutter suburbs." As the economy grew and new markets developed, each town could always *adjust the zoning of remaining land* to capture the best of the expanding markets. An apt comparison is this: corporations expend their financial assets in pursuit of their economic goals; municipalities "spend" their land.

And as the need for new and expanding municipal services grew — police, road repair, libraries, schools, parks, hospitals — local Master Plans were adjusted to attract businesses with high tax potential. As this became more common, it became known as "fiscal zoning." As well, State governments grew, supported by national taxes *sent back* to the states from Washington, to provide "regional" services — sewage treatment, reservoirs, colleges, high capacity regional roads, regional parks and nature preserves. In time, these and other regional facilities *would compete with one another for scarcer (and more expensive) sites in more crowded landscapes*. The same competition arose inside the changing master plans of more crowded municipalities.

As these powerful changes developed momentum, single municipalities evolved into clusters of municipalities who came to share similar fates and fortunes. An example of the former is Edison, whose employment growth symbolizes this enormous economic/spatial shift across New Jersey and many metropolitan areas like our own. By 1990, the township of Edison's employment (62,935) had eclipsed the job bases of four of the state's six largest cities, approached that of Jersey City's (63,412), was more than half again that of Elizabeth (39,117), was nearly double that of Paterson (34,568), was more than double that of Camden (28,028), and nearly triple that of Trenton (23,225). In higher density suburban and metropolitan landscapes like these, transportation planners and investors have new clusters of customers to serve, and more difficult decisions to make.

As jobs and population dispersed into some 25 large, metropolitan areas, travel patterns shifted away from the traditional suburb to city flow, towards the more familiar -- and more perplexing -- overlapping rivulets and streams of traffic, many of which do *not* lead to major cities. So a great many more trips are now being taken across our metropolitan transportation networks and in hundreds of different directions in each one of them than was the case in 1960.

Yet, our investments have not kept up with the great surges of growth between 1950 and 1990. In 1960, investment in public infrastructure was 2.5% of Gross National Product. By 1990, after a period of national growth unprecedented in our history, that number had dropped to 1%. So, we are challenged to find transportation solutions to the unprecedented growth in demand on a network designed for a different economic geography and with rising costs for maintenance and rehabilitation in a difficult investment climate. As the current debates about reauthorization of ISTEA clearly show, the stakes are high and the competition deadly.

In sum, over the past forty years we have seen a number of dramatic shifts in:

- what our economy now produces;
- who now produces it and where;
- who purchases the goods and services we produce;
- where and at what densities we now live and work;
- how we travel about the landscape of our work residence and recreation; and
- what we import and what we used to export.

We discover ourselves inhabiting a transformed economy on a transformed landscape and in need of a transformed transportation system. Bergen County has been an active participant in the creation of this new economy and as the next sections show is developing an investment agenda to protect the economic power we have in place while preparing for the new rounds of growth and re-use that lie ahead. (See Figures 5, 6, 7 and 8 following.)

Figure 5.

Bergen County is New Jersey's Economic Engine:

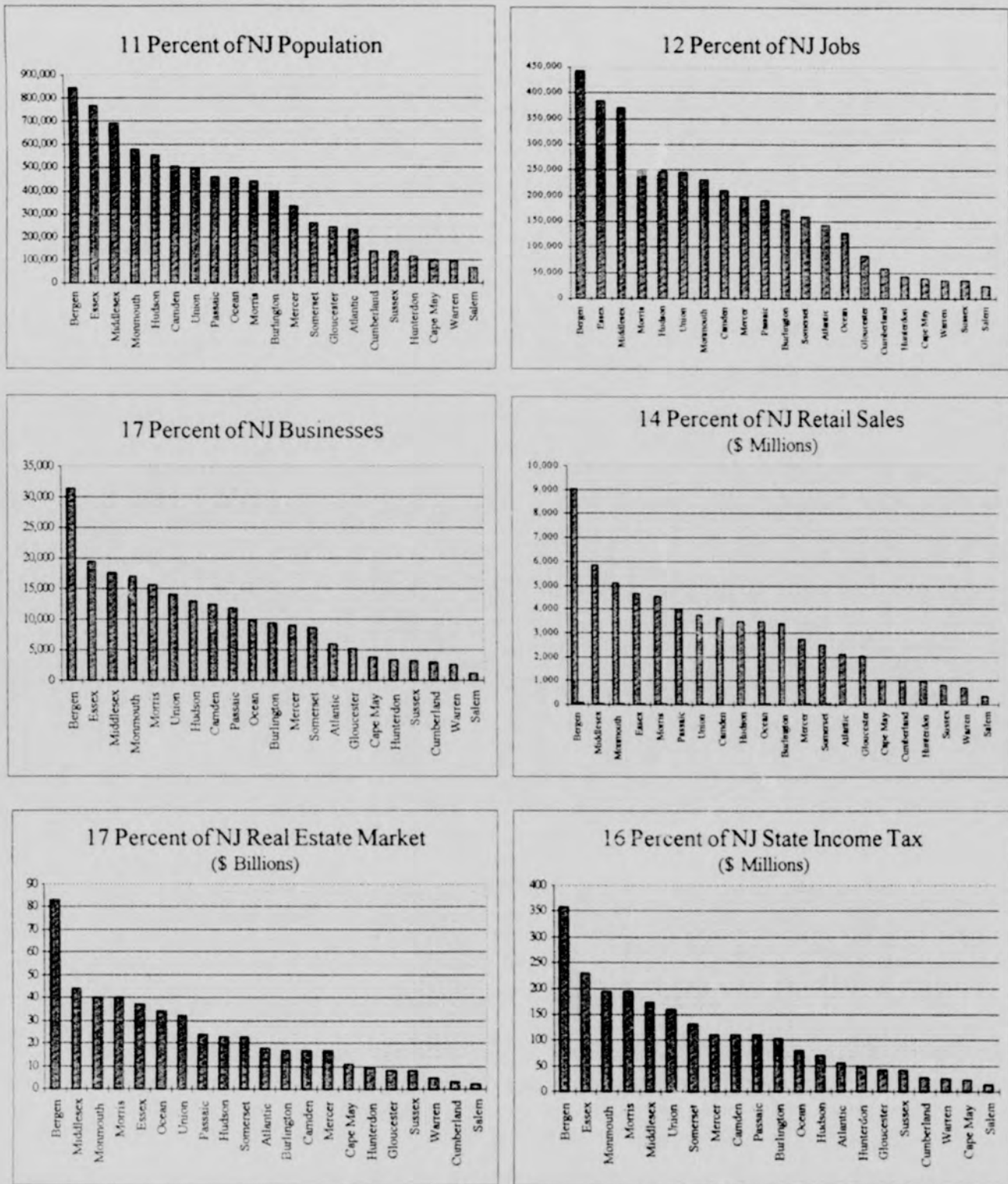


Figure 6.

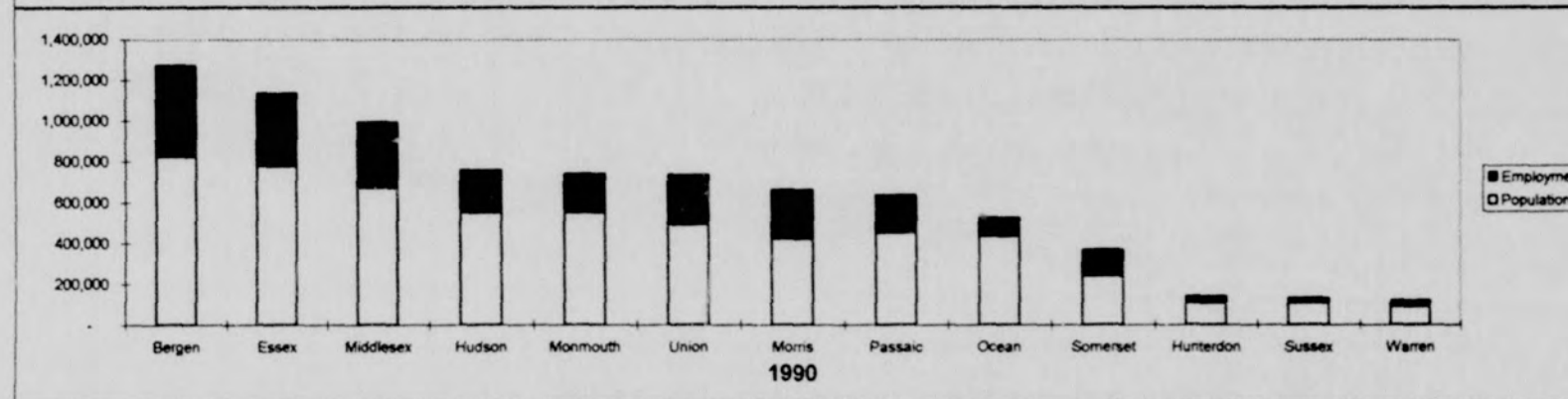
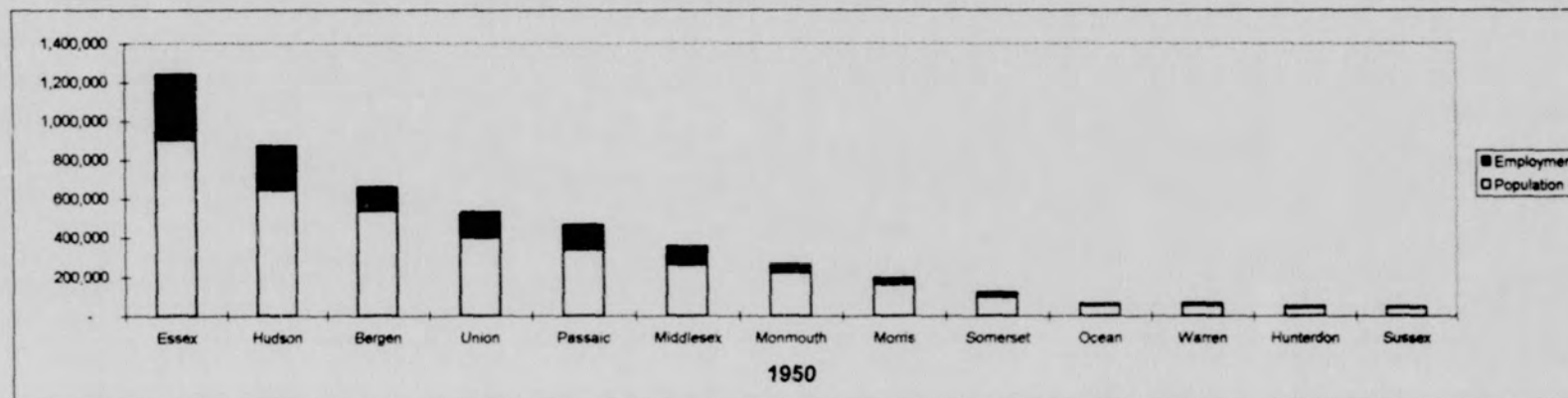
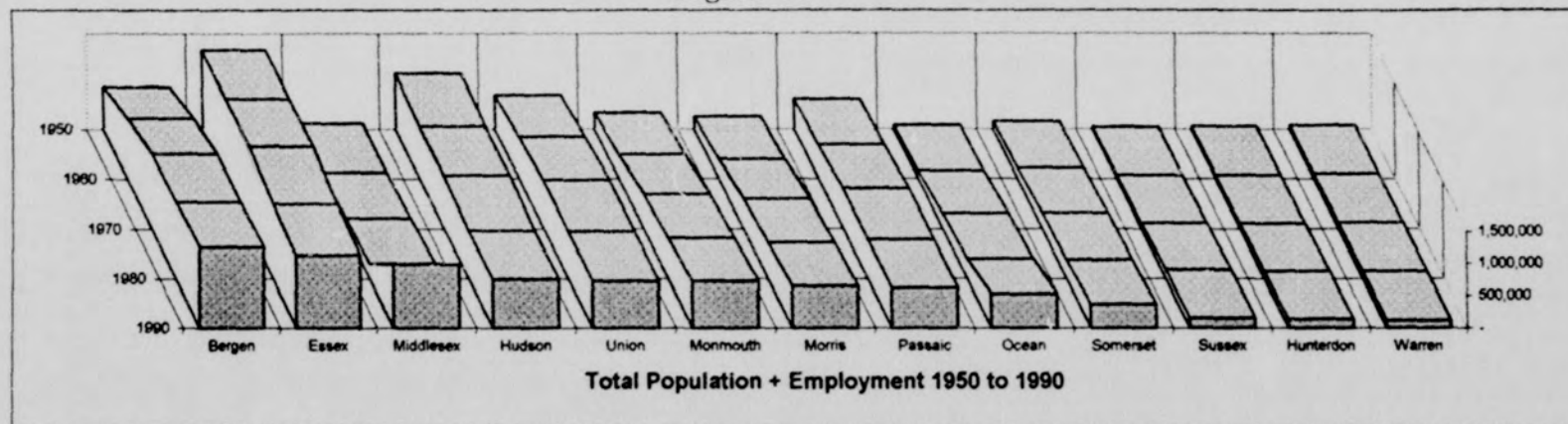
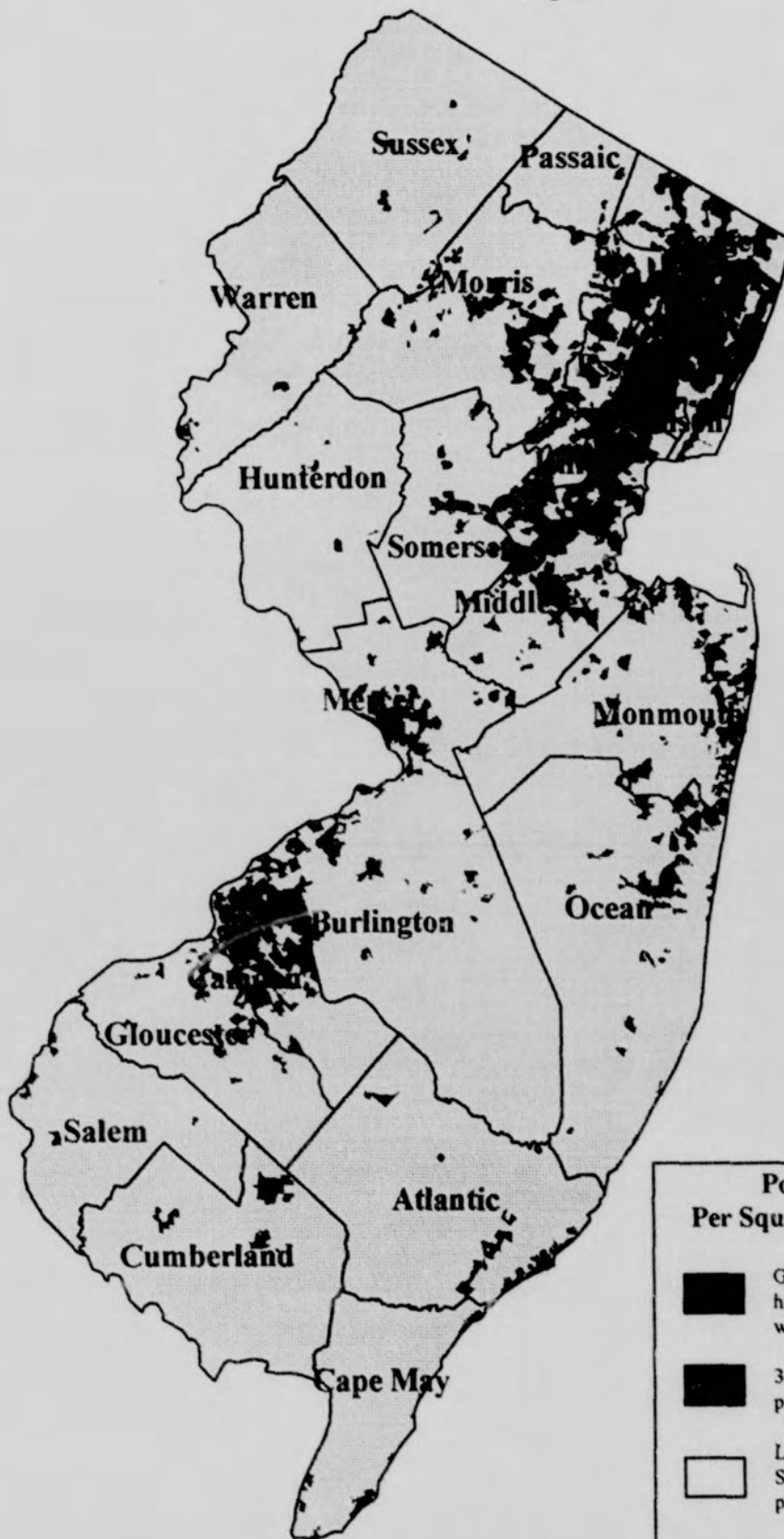


Figure 7.

STATE OF NEW JERSEY

**POPULATION AND
EMPLOYMENT
DENSITY PER SQUARE
MILE BY CENSUS
BLOCK GROUP**



Population Plus Employment Per Square Mile by Census Block Group




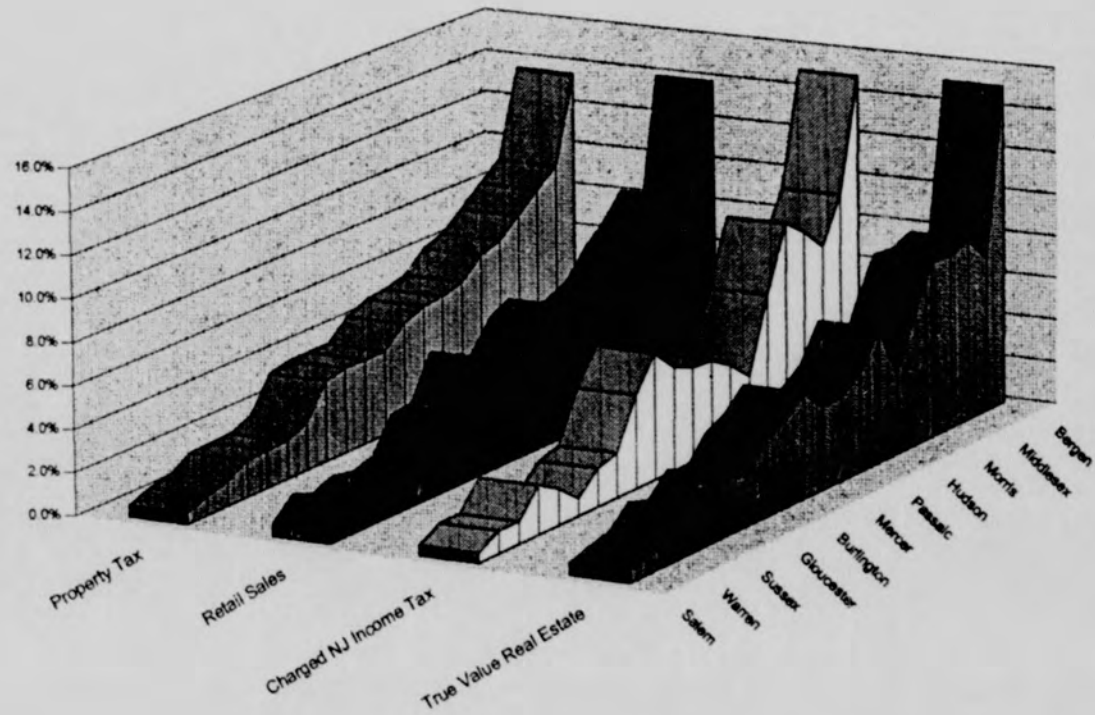
-  Greater than 10,500 - High Frequency, high speed transit possible, but not widely available.
-  3,200 to 10,500 - Hourly local bus, plus commuter rail to Manhattan.
-  Less than 3,200 - Any local transit is rare. Some rush hour long distance bus, via park-ride.

Figure 8.

Comparative Tax Analysis for NJ Counties

*BERGEN TOPS
EVERY CATEGORY...*

County	Property Tax	Retail Sales	Charged NJ Income Tax	TRUE Value Real Estate
Bergen	13.5%	13.9%	14.9%	15.1%
Essex	9.4%	7.1%	9.5%	7.3%
Middlesex	8.6%	9.0%	7.4%	8.6%
Monmouth	7.8%	7.9%	8.5%	8.2%
Morris	6.9%	7.0%	9.3%	8.3%
Union	6.6%	5.8%	6.3%	6.3%
Hudson	5.7%	5.3%	2.8%	3.9%
Ocean	5.4%	5.3%	3.8%	6.3%
Passaic	5.3%	6.1%	4.4%	4.6%
Camden	4.9%	5.6%	4.5%	3.9%
Mercer	4.0%	4.2%	4.9%	3.8%
Somerset	4.0%	3.9%	5.9%	4.9%
Burlington	4.0%	5.2%	4.4%	4.0%
Atlantic	3.8%	3.2%	2.1%	3.5%
Gloucester	2.2%	3.1%	1.8%	2.3%
Cape May	1.8%	1.5%	0.8%	2.6%
Sussex	1.8%	1.2%	1.7%	1.7%
Hunterdon	1.7%	1.5%	2.3%	2.0%
Warren	1.1%	1.1%	1.0%	1.1%
Cumberland	0.9%	1.5%	1.1%	0.8%
Salem	0.5%	0.6%	0.5%	0.6%



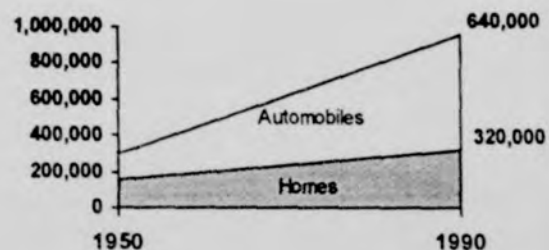
Source (Chart utilizes latest data available):
 1996 Property Tax and True Value Real Estate (State of NJ, Department of the Treasury, Division of Taxation)
 1993 Charged NJ Income Tax (Reported April 15, 1994 - Statistics of Income, State of NJ, Department of the Treasury, Office of Tax Analysis)
 1992 Retail Sales (Census of Retail Trade, Bureau of the Census)

Bergen County Department of
 Planning & Economic Development
 October 1997

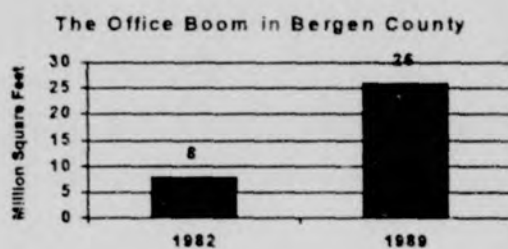
The New Service/Information Economy: Bergen County's All Day Economic Landscape.

As our nation's life was unfolding like this, so was our state's. By 1990, New Jersey, the nation's fifth smallest state, had become the eighth largest economy among the 50 states. Were we a nation, our economy would constitute the world's 18th largest. But among these eight, New Jersey possesses *the most compact economy of them all*. And within New Jersey, among the 21 counties, Bergen County *continues to constitute the state's largest single economic concentration, and on but 3% of the state's land mass*.

Bergen County's economic geography was transformed in much the same way as was the nation's, *but with greater intensity and speed*. Between 1950 and 1996 our population increased by more than half to 848,000 while our housing stock doubled to 324,000, and while total employment and vehicle miles driven within our borders more than *quadrupled* to 550,000, and 5.0 billion, respectively.



No other county in the State of New Jersey contains economic concentrations this large, or endures more miles driven in and through it. (See Figure 9 on the next page.) *And we are still growing.* The 1996 Census estimates put Bergen's population up by 41,000 since the 825,000 recorded in the 1990 Census.



The office boom in Bergen County that occurred between 1982 and 1989 came at the tail end of this

30-year economic revolution and concentrated its dynamics. Over that short, unprecedented spurt Bergen County's stock of rental office space increased by 308% from 8 million square feet to 26 million square feet, also the highest in the state. This yields a strong economic base, but it is the land use that generates the most traffic all day long.

This burst, representing the embedding of the service/information economy into our already crowded landscape, would upset and come close to overturning the present transportation network's now-limited capacities to handle the new traffic flows. During the most rapid interval of this transformation, between 1970 and 1995, the number of trips per day inside our county shot upward from 2.8 million to 3.2 million. In highway terms, this increase would have required us to build 248 new lane miles of road to keep up with the

Figure 9.

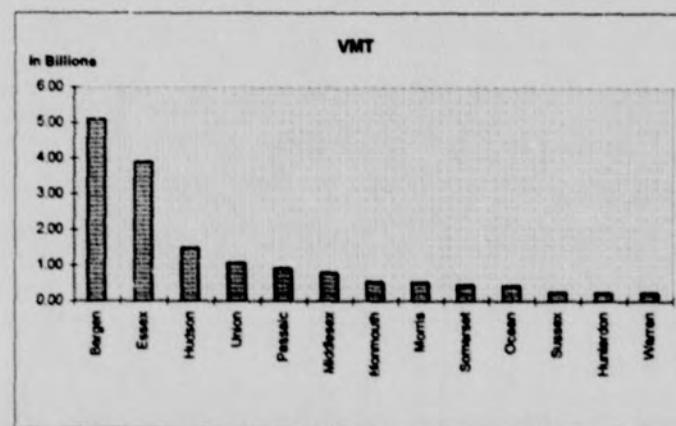
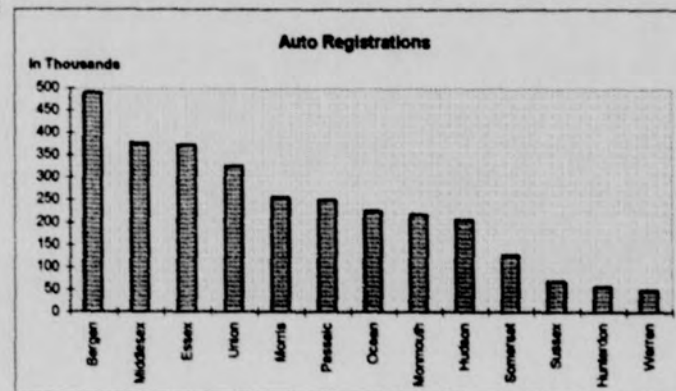
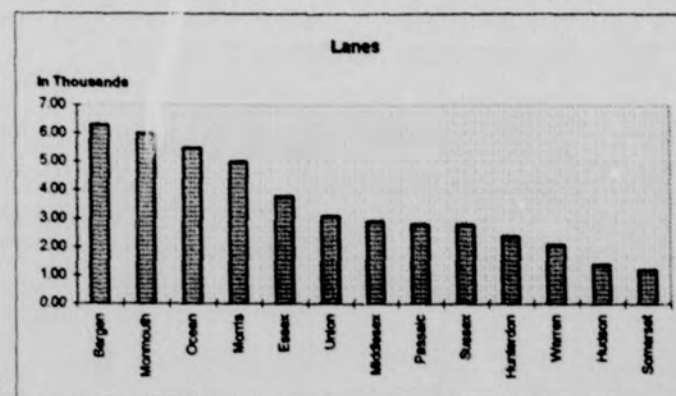
NEW JERSEY IN THE TRAFFIC ZONE

In New Jersey, Bergen County has the:

Most Lanes

Most Auto Registrations

Most Vehicle Miles Traveled



onslaught -- enough to add a lane stretching from Hackensack to Atlantic City and back. We did not.

This is the radically changed metropolitan landscape, designed specifically for the automobile *but now being overpowered by it, for which newly conceived forms of transit are needed.* In metropolitan regions like ours the nation over, this has become a matter of substantial economic urgency. As we come to grips with these changes, and with the service economy now generating heavy, mixed traffic *all day long*, we discover that different balances of different mixes of transit service are necessary in different landscapes -- urban, suburban, and rural.

From Growth Management to Sustained Economic Performance: Cross Acceptance 1997.

Back in 1988, during our first Cross Acceptance marathon, we knew we were in an unusual economic expansion. But we didn't know how it would turn out. Now we do. The results would be eye-popping. This section describes these changes and shows the way in which key themes of congestion, economic performance and stretched transportation capacity come together in Bergen County's economic core. The critical role of transportation in sustaining the economic heart of New Jersey's largest county economy is identified as a prelude to the new array of intermodal transportation investments identified below.

New Jersey's 1989-1992 recession, our worst and most painful in the 60 years since the Great Depression, would stop dead in its tracks the astonishing, six year employment boom that had just preceded it and that had crystallized our planning during Cross Acceptance One. The largest and longest since World II, our extraordinary 1980's boom had contributed 621,500 new jobs to the state's economy at an unprecedented rate of 90,000 new jobs per year. This contrasts with the *annual average rate of job growth, across eight business cycles since 1950, of 50,000 new jobs per year.*

Then, and at a comparably dizzying pace, the recession saw the state abruptly lose 242,000 jobs over the next 3 years -- *more than 4 of every 10 added during the boom.* Having added jobs at 90,000 per year over 7 years, we then lost jobs at 80,000 per year over 3 years. The ones we *lost* would not all come from the huge increment we had *added*, however. The other, more tenacious economic forces described here were still at work.

Finally, in September of 1997, the state would finally have gained back the *number of jobs* - - 242,000 -- *lost between 1989 and 1992* -- making this five-plus year recovery cycle our longest on record, as well, since the Great Depression. Again, *these would not all be the same jobs we lost* -- powerful forces still at work and expected to remain at work. This is to say that, beyond these wild swings in the business cycle, the clear imprint of the major *economic trends* since 1950 remains in place. The '80s speeded them up, and the '90s slowed them down.

Now we're back on the job creation track. And the congestion of the late '80s is back and growing. It contributes to the thinking we must do about expanded roles for transit. The future isn't what it used to be.

Bergen County's Targeted Response to Cross Acceptance in 1988.

Open Space Initiatives

In 1990, after a period of intense analysis of land development and growth capacity launched with our 70 municipalities during State Plan Cross Acceptance in 1988, and in response to straw polls we took of this entire delegation, Bergen County launched a 5,000-acre open space crusade. Over these nine years, we are closing in on doubling all the acreage we had assembled in county parks and natural areas in all the years prior to 1988.

Capital Planning Capacity

As an extension of the land and zoning capacity calculations we performed with all 70 municipalities during Cross Acceptance in 1988, we then developed a series of computer-based models to help us anticipate traffic growth lurking in land available as zoned, and traffic to anticipate with the upcoming (1992) completion of Interstate 287's "missing link" and its interchanges in Bergen County in Oakland (at Route 208) and in Mahwah (at Route 17 and Interstate 84 in New York State).

We also launched an associated analysis of our transportation network's present and future conditions and needs. We began by determining the central relationships between our economic assets and the capacities of the regional and local roadway and transit systems to sustain them into the future. Our investigation incorporated a careful look at the economy of the county *and its economic distribution* -- the *density* of its key land uses for defining transit opportunities. We discovered that we had, and have, new and growing transportation needs to address for our transformed landscape.

Bergen County's Five Major Transportation Investment Initiatives Since Cross Acceptance in 1988.

All of the changes discussed here -- economic, geographic, spatial and demographic - have contributed mightily to the massive changes in the make-up of our transportation needs -- for moving people and goods -- by road and rail, by car, truck and bus, and by train, plane and ship. Most of these facilities, local and regional, do not match up very well today, with the major elements now in place having been built in a different era for a different economy in a different competitive atmosphere.

In Bergen County, cars, buses and trucks compete for limited space on roads. One of our recent studies showed us that Bergen County draws 40% of its daily work force from 330 municipalities outside of Bergen County in 4 states. In 1990, trucks now handle some part of their trip to market *for 90% of what we manufacture, import, grow and sell*. They are everywhere. Just as competitively, rail freight, commuter rail and Light Rail compete for limited track and terminal capacity. Close by in our region, air freight competes for ground and runway space with air passenger space, shipping competes for landside space with new urban waterfront-oriented homes and jobs, and *all of these compete with each*

other and with natural ecosystems for precious waterfront space. Intermodal planning as compared with Intramodal planning is urgent stuff.

Every one of these competitors is supported by major interest groups pursuing economic strength, and each has a competing vision for what the "balance" should be. Those who plan in order to forge a compatible mix of all of these have their hands more than full. That includes us. We have thought hard about all of these in the preparation of the five major transportation initiatives described here.

Improving the Efficiency of the Existing Highway Network

On the highway side, depicted in Figure 10, we saw the vital importance of expanding the Routes 4/17 Interchange -- both in its future capacity to absorb larger traffic flows from the surrounding region, and of greater importance, to help attack East-West congestion by expanding the ease and speed with which of all of its users can change direction to gain access to more destinations. We began our work to design its future for the mix of local and regional travelers whose thousands of separate paths converge here daily. At county scale, nearly all of Bergen County's 37,000 private sector businesses -- the largest concentration in the state -- find some members of their work force dependent on this congealing interchange in their journeys to and from work. To expand and re-align it, then, is also a decision to strengthen the business climate in our county.

Pretty much the same number of people pass through this interchange daily -- the number hovers around 250,000 -- as cross the Hudson River from all of New Jersey every morning by bridge, train, tunnel and PATH. Its present loop system was built with pride in 1934, but for Model A's putt-putt putting through a landscape of homes amidst celery farms. We formed a partnership of mall owners, municipal officials, county engineers and NJ Department of Transportation engineers, rolled up our sleeves and turned on the Computer Aided Design software. The preliminary design was complete and acceptable to all parties in 14 months and is funded in the Transportation Improvement Program. See Figure 11.

Enhancing the Capacity of the Existing Commuter Rail Transit System

On the transit side, we discovered first that while buses now carry the majority of our transit users, their ability to sustain our economic and transportation future is seriously limited by the Lincoln Tunnel, its crowded Exclusive Bus Lane on Routes 3 and 495, and by the congested roadways leading to both. In short, buses traveling our 124 routes are trapped in the traffic they seek to displace, including the large, long distance complement of them that passes through Bergen County with "closed doors."

This led to our concentration on advocating for the Secaucus Transfer and its ability to induce more rail riders as parking can be assembled at upwards of 100 New Jersey stations along all of its connecting lines. Three -- the Main, Bergen and Pascack Valley lines -- currently carry commuter rail traffic southward across Bergen County to Hoboken. Rail freight grows steadily on two of them.

To best prepare ourselves for the benefits this magnificent new rail facility will deliver to

Figure 10. Regional Highway Network

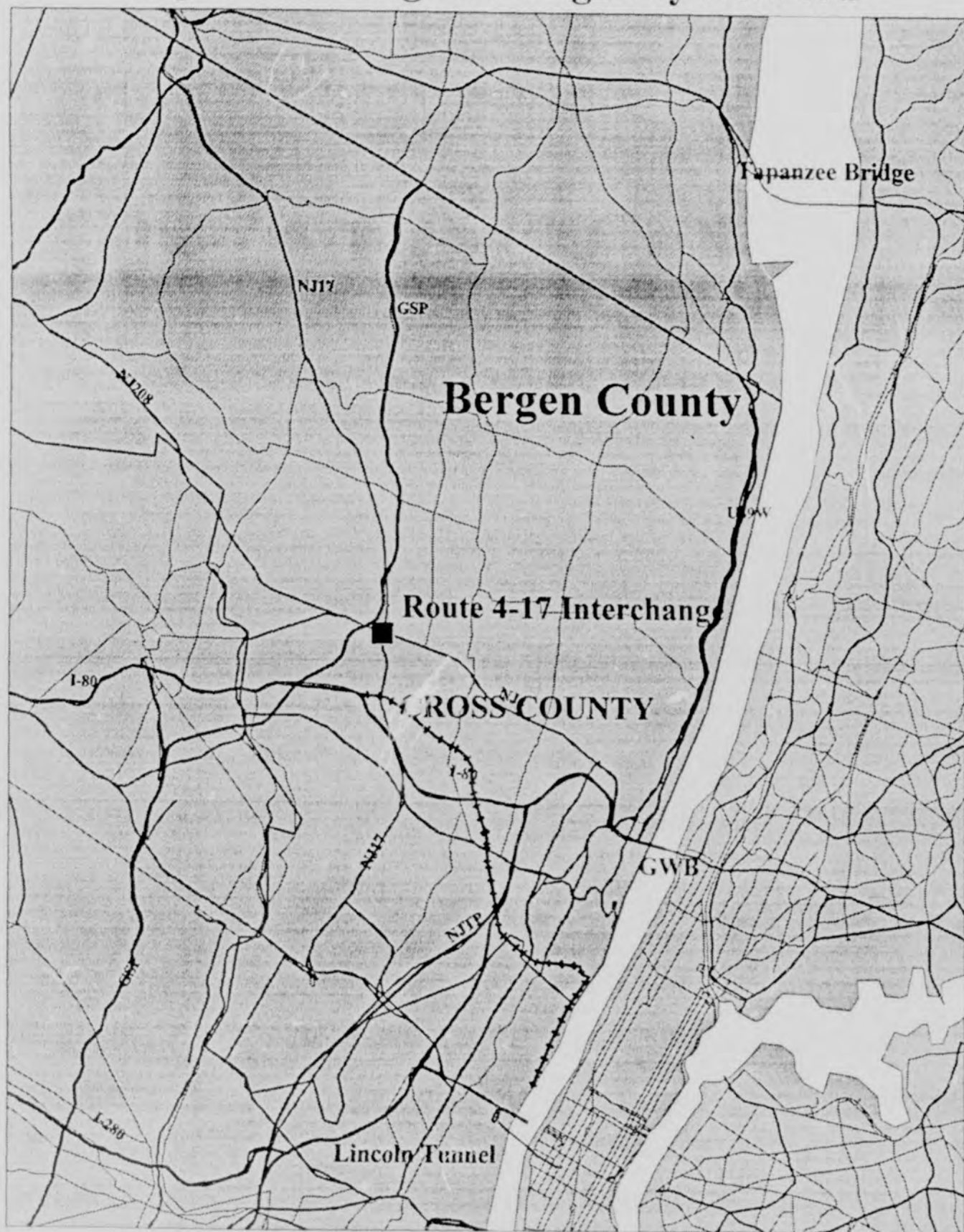
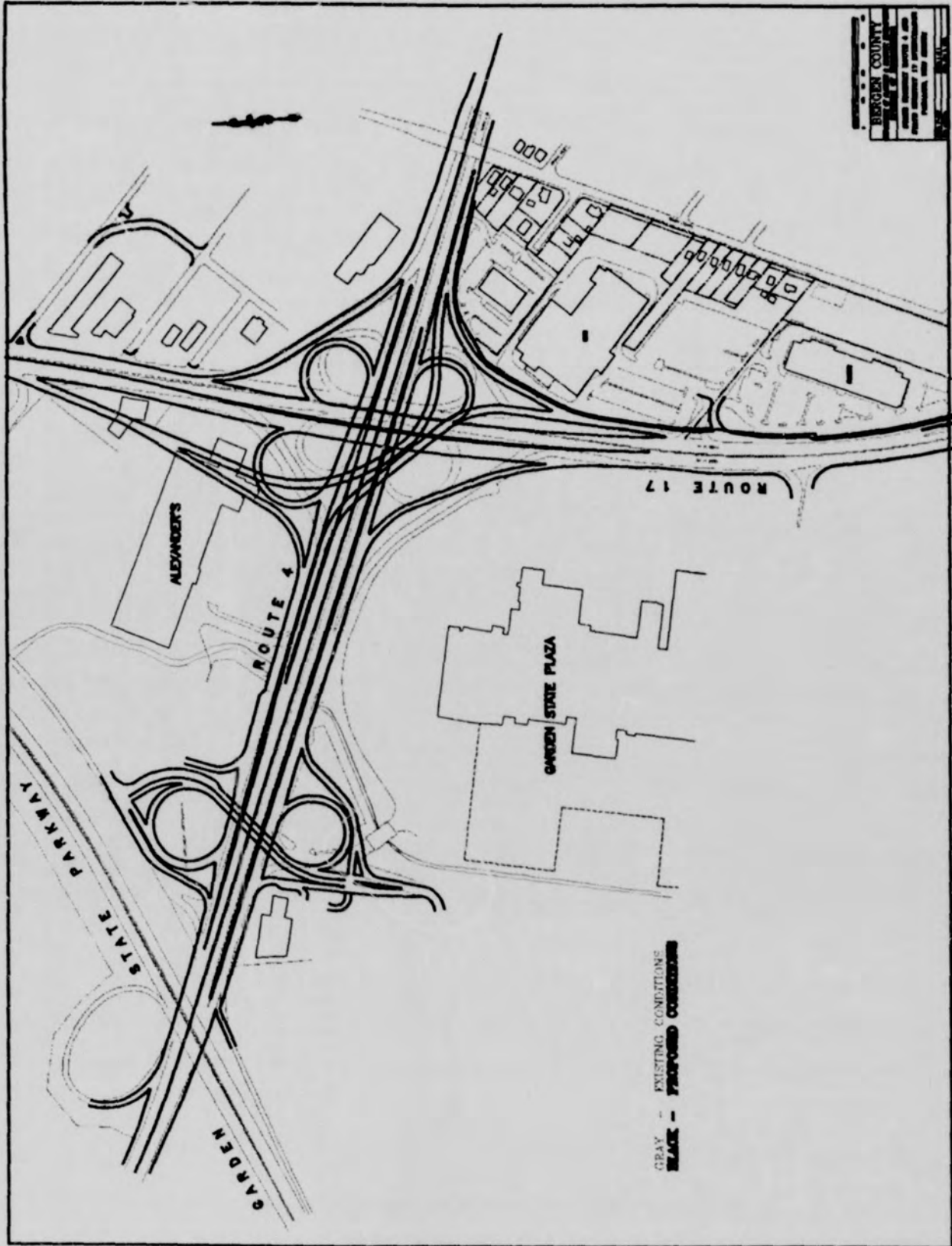


Figure 11.



Bergen County and our entire region, we joined NJ Transit's ambitious effort to double the parking spaces along the Bergen, Main and Pascack Valley lines -- from 4,000 to 8,000 -- in time for its opening. The Secaucus Transfer/Allied Junction project, a public/private partnership with enormous potential for helping induce transit friendly land use, will also increase substantially the number of destinations our rail riders can reach along these three lines. Put simply, the greater the number of riders, the better and more frequent, and thus the more attractive the service can be.

The Bergen, Main and Pascack lines could potentially be joined at the Secaucus Transfer by a fourth and or fifth -- the West Shore and/or the Northern Branch -- as future products, not yet tested, from another, ongoing Bergen County/NJ Transit partnership. In this partnership formed in September of 1996, Bergen County and New Jersey Transit are conducting, together, a Major Investment Study of the comparative mobility strengths offered by various combinations of three potentially new rail transit services in Eastern and central Bergen County -- along all or portions of the West Shore, the Northern Branch, and of what we call the "Cross County Line" from central Bergen to Weehawken on half of the existing Right of Way of the Susquehanna and Western line. (See Figure 12, following.)

Both the Routes 4/17 interchange and the Secaucus Transfer have been funded, with the Secaucus Transfer under construction and scheduled to open in 2002. The Routes 4/17 interchange, along with other nearby components adjusted to fit its design, is scheduled for construction in 1998, 1999 and 2000.

The Hudson Bergen Light Rail Transit line: It can tie Bergen County's residents, work force and economy to Hudson County, its Waterfront, Weehawken's New York Waterway Ferry, Hoboken (to downtown Manhattan via Ferry and Path); Jersey City's Journal Square and Newark by PATH from Hoboken, Newport and Exchange Place; Liberty State Park, and Bayonne.

Since Cross Acceptance in 1988, a third major, regional transportation initiative has also entered our planning landscape -- the Hudson Bergen Light Rail Transit line. As was the case with the Routes 4 and 17 projects which we initiated, and the Secaucus Transfer which we advocated strongly for, the Hudson Bergen Light Rail immediately became another major investment opportunity for us to study, to influence in its configuration, and join in its funding advocacy. Figure 13 shows the route that was chosen, in 1993, from eight alternatives studied and evaluated over its seven year gestation period.

This major new Light Rail project, whose first funded segment was chosen for construction between Bayonne and Hoboken, named the Vince Lombardi Park-Ride in Ridgewood as its final and northernmost destination, and Bergen County's only stop on the 32-stop line. Its arrival date was estimated, by NJ Transit, for the year 2010. As was the case with the 4/17 interchange, we have worked strenuously in many forums over the last four years to bring its final design, funding and construction much closer to the present.

This choice for its northern terminus was not a good place for us. People coming in on its trolleys from Hoboken and Weehawken to the south will step off into a Park-Ride nestled between two spurs of the NJ Turnpike. So they will have no easy way to get to our offices, homes, hospitals, colleges and all the other auto-attractive destinations listed in Bergen's

Figure 12.

The Bergen Cross County Light Rail Adds Two Extensions to The Hudson Bergen Light Rail

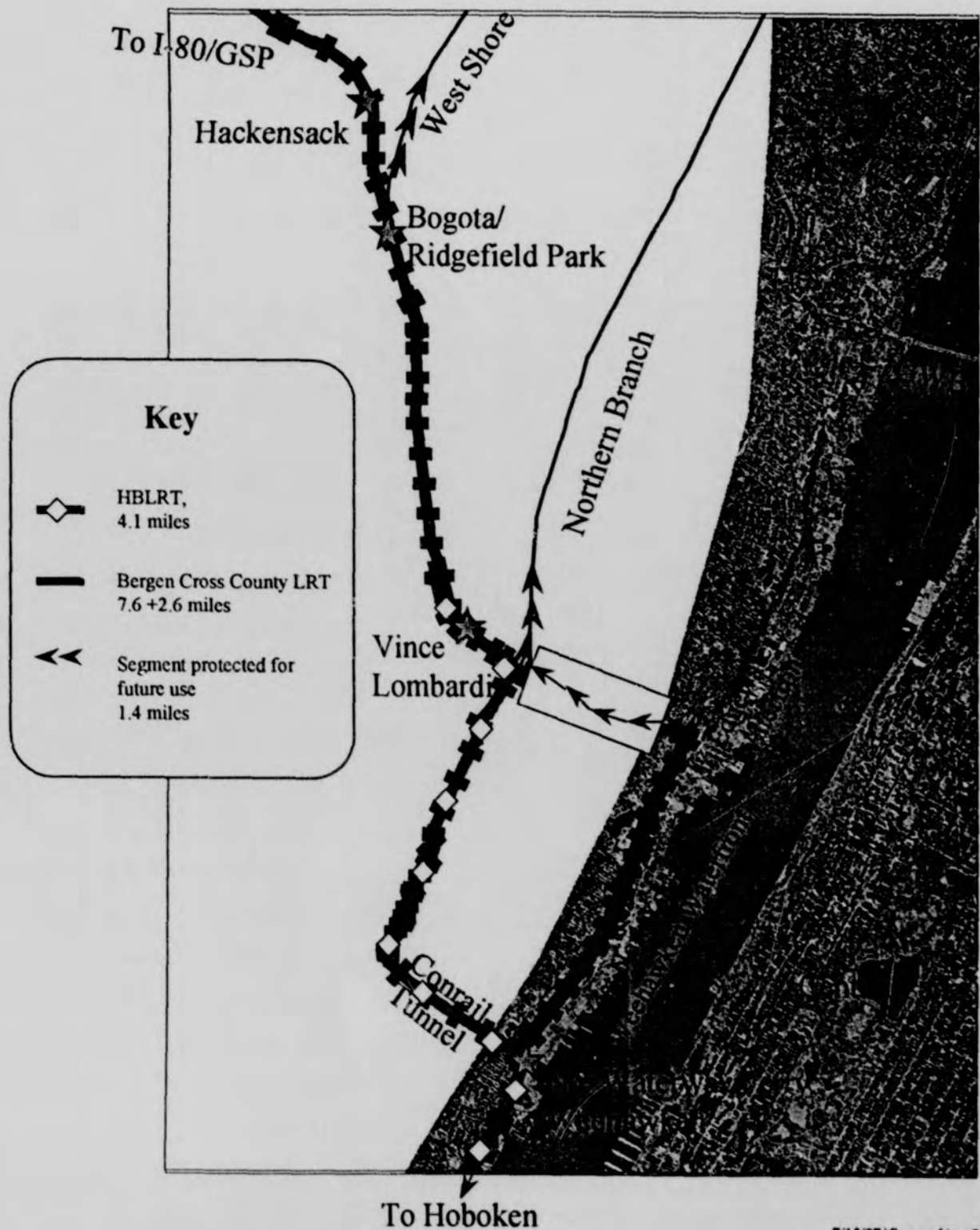


Figure 13.



Waterfront Corridor Preferred Alternative

Yellow Pages. As configured, then, it effectively carries passengers in only one direction -- southbound -- and from a point hard to reach for our 848,000 residents.

So while this station helps the rest of the line with ridership derived via Park-Ride from Interstate 95 drivers -- a positive feature -- the whole system's ridership is *not* increased in its strength by rail riders from the south, including cross commuters from New York City. So an additional consequence is financial. Without much "reverse commuting" capacity, it loses customers whose fares could help support its operating costs if only northbound users could be accommodated, and southbound passengers could be substantially increased in their numbers. *Further, the loss of Light Rail access to Edgewater and to the Hudson River Waterfront southward to Weehawken, now booming along a two lane (Level of Service F) road was a substantial one.*

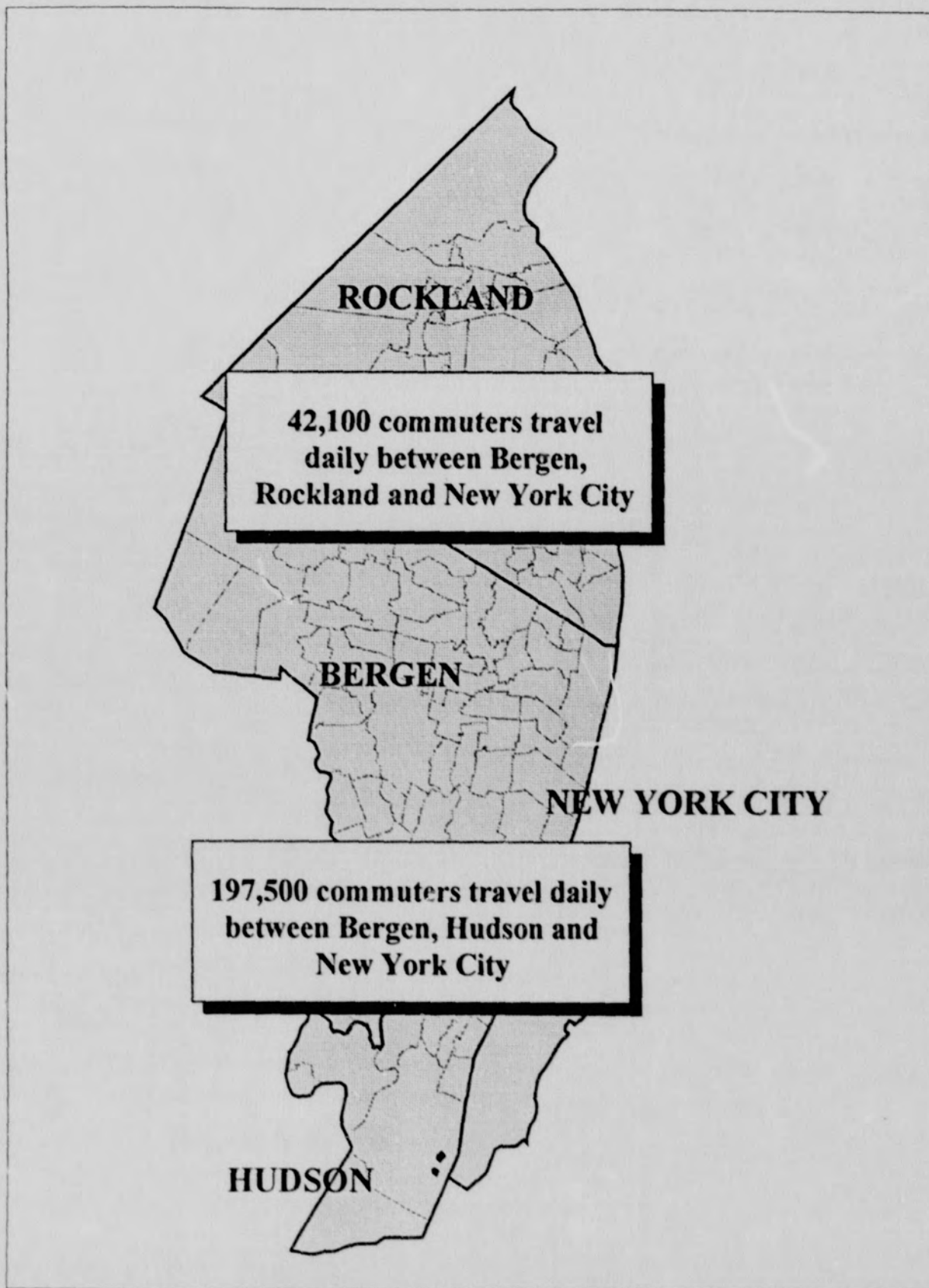
To correct these deficiencies without disturbing its standing in the Urban Core as a completed FEIS project with a full funding agreement for its first, Bayonne to Hoboken stage, we have devised and tested the engineering and environmental feasibility of the project we call the Cross County Line. More on that below.

Missing Mobility Options: New Transit Investments and Economic Performance.

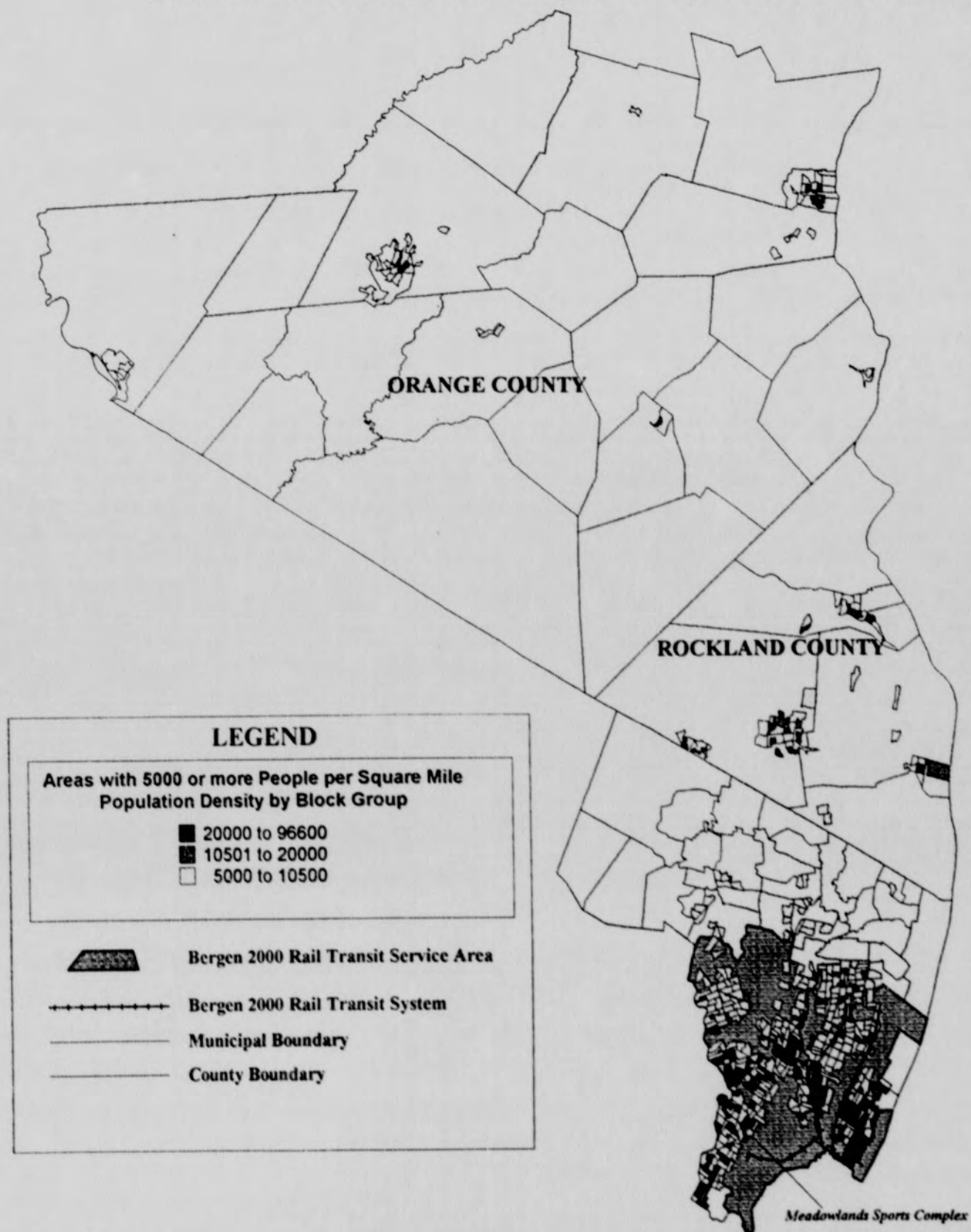
There has always been a close connection between transportation capacity and land use and economic development in Bergen County. The transit connections along our commuter rail roads and bus network have linked Bergen County's residential values to Manhattan's high-wage jobs sustaining local tax bases and schools. The highway connections to the nation have been the pathways along which the explosive growth in jobs outlined earlier have grown. Yet, as growth has matured, and regional investment lagged the explosive growth in regional commuters headed to -- and through -- Bergen County four new investment principles have emerged.

1. Our transportation investments must be targeted to areas where the outcomes for economic performance are highest. Here we must always balance the need to protect the results of past growth and the need to liberate the possibilities for the new high value service economy emerging in our midst. We must consider:
 - where our needs and our opportunities most strongly merge in the rail choices available to us;
 - who our most productive economic partners in the region are; and
 - which rail transit linkages offer us the best opportunities to link together our most important, shared assets. For example, our strongest linkages are to Hudson County and Manhattan, and not to Rockland County (See Figures 14 and 15 on the next pages).
2. We need to think in terms of a single integrated multi-modal transportation network that can accommodate the competing needs of its many customers that have different needs at different times of the day. Although investment has lagged behind demand in Bergen County, the in-place investment in roads and rail has a replacement value in excess of \$25 billion -- more than the entire projected federal funding for north Jersey over the next 20 years. So looking for places where we can increase the productivity of the existing system by connecting its disparate pieces, filling service gaps, or providing for easy changes

Figure 14.



Transit Investments Should be Targeted to High density areas first



between modes (rail to bus, bus to Light rail, auto to light rail) will not only provide new capacity but increase the return on investments already made. We can no longer afford to make investments without regard to their implications for the efficiency of the overall network both in terms of existing facilities and services and other investments they may induce.

3. We need to tailor solutions, both in terms of their scale and timing, to the available funding sources. Despite the heroic efforts of ISTEA to reverse the decline in spending identified above, it is likely that the flow of federal and state funds to transit and other transportation projects in northern New Jersey will lag behind the rising needs for system maintenance and capacity expansion. So in developing transportation investments we must think not only in terms of the "ultimate" or "perfect" solution, but also in terms of a "phased approach". In some cases it might be possible to advance the goals of a specific transportation investment by beginning with a "critical component" or by a more limited service configuration, or lower cost technology that can be expanded as the market grows and/or funding becomes available. Even when this might increase the overall cost of the project these costs must be weighted against the benefits that are delivered earlier. There is nothing more futile than developing the perfect solution for which funding is not available.

In doing this we must consider new sources and partnerships. *What private sector assistance can be enlisted?* Bergen County has already established a record of success in integrating our own planning and investment with the planning and investment of others — very much at the heart of the State Development and Redevelopment Plan's major goals. Examples are Routes 4/17, the Edgewater Waterfront, the Hackensack Medical Center, our Essex Street initiative, which includes the redesign of the Essex Street interchange with Route 17, and others.

4. Investment choices must be supported by our municipal partners who are keen to take advantage of the economic benefits of transit investments through matched land use and transportation investments. For a transit system to be truly successful, the design process must encourage active participation from those who will help determine its outcome.

These themes come together in *Bergen County's economic and transportation core*, described in the next section.

Investing in Economic Performance in Bergen County's Economic & Transportation Core.

Our investigations of the key relationships between the patterns of economic development, land use and transportation countywide led us unerringly to the identification and detailed description of Bergen County's economic and transportation core. In a 98 square mile, centrally located core — several illustrations follow — are concentrated, first, our county's highest concentration of population per square mile and employment per square occurring in combination with each other (Figure 16).

Figures 17 and 18, following, show how a much broader and related series also occur coterminously here. For example, this economic core is also the county's financial core, including its capacity to generate our highest concentrations of assessed value, offices, income earned and taxes — sales, property, and income — generated. As Bergen County is the State's economic engine, this is the county's.

Figure 16.

**THE CORE HAS DENSE POPULATION
AND EMPLOYMENT CONCENTRATIONS
WITH THE TWO OCCURRING
IN COMBINATION ...**

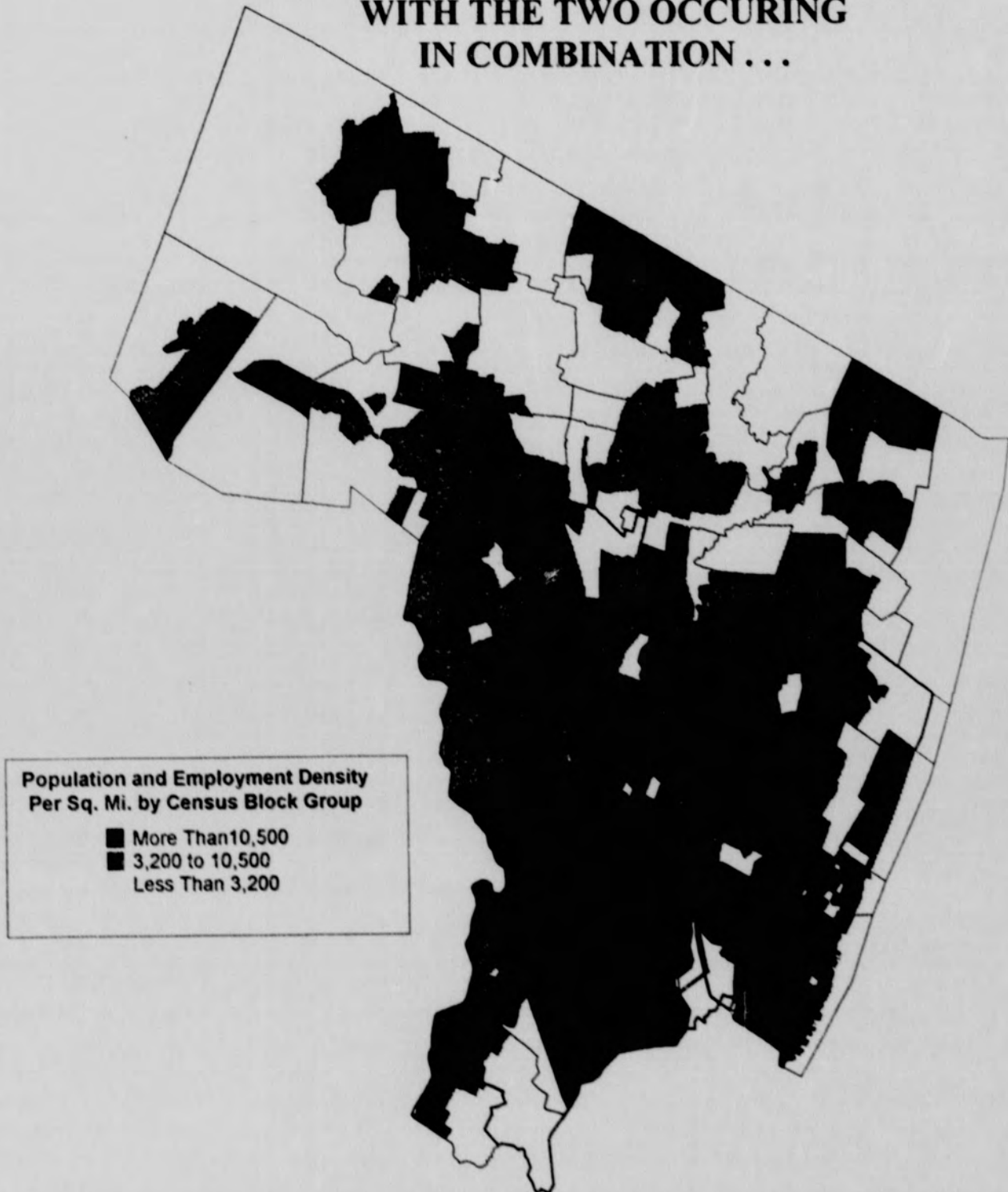
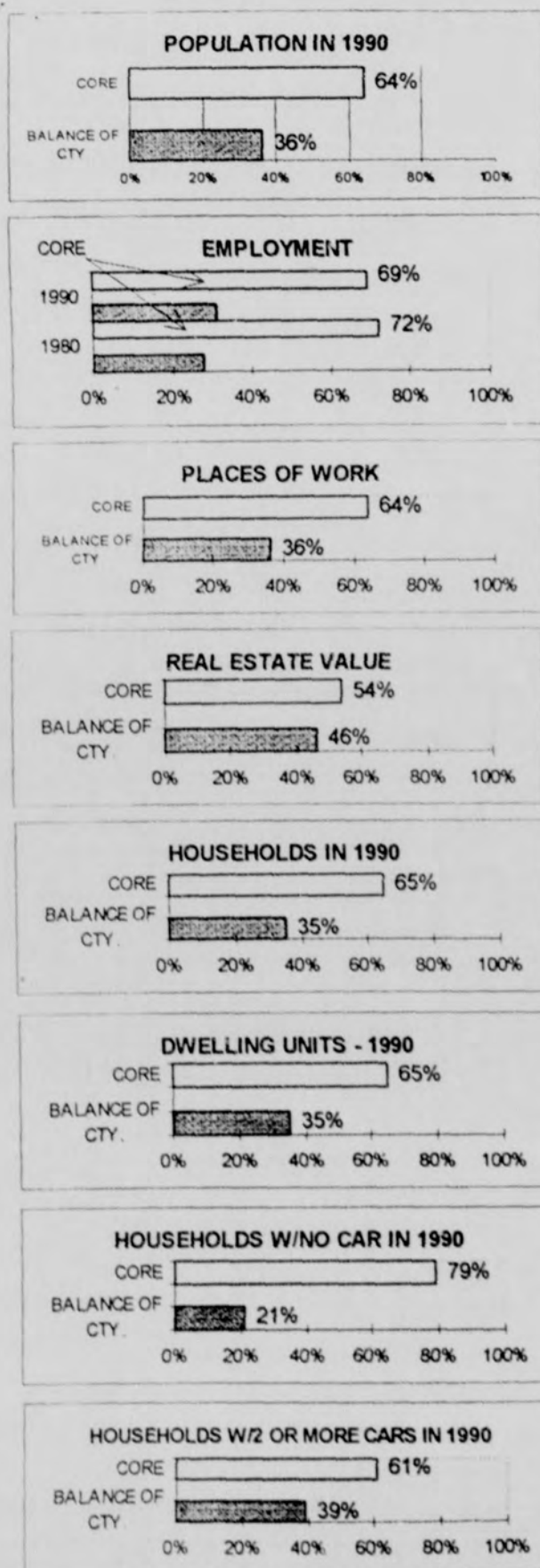


Figure 17.



FEATURES OF BERGEN COUNTY'S ECONOMIC CORE

Category	1990
Population in Core	526,368
Population in Balance of County	299,011
Employment in Core	300,216
Employment in Balance of County	136,484
Places of Work in Core	24,126
Places of Work in Balance of County	13,728
Real Estate Value in Core	\$44,105,877,091
Real Estate Value in Balance of County	\$37,164,578,766
Households in Core	202,023
Households in Balance of County	106,857
Dwelling Units in Core	212,344
Dwelling Units in Balance of County	112,473
Households w/no Car in Core	21,573
Households w/no Car in Balance of County	5,786
Households w/2 or more Cars in Core	72,123
Households w/2 or more Cars in Balance of County	46,700

Figure 18 - Features of Bergen County's Economic Core:

CATEGORY	Core	Core as a % of the County Total	Balance of County
POPULATION IN 1990	526,368	64%	299,011
COVERED EMPLOYMENT IN 1980	245,312	72%	94,984
COVERED EMPLOYMENT IN 1990	300,216	69%	136,484
RESIDENT COMMUTERS IN 1990	219,944	64%	122,893
DAYTIME POPULATION IN 1990	606,640	66%	312,602
CHANGE IN DAYTIME POPULATION	80,272	99%	1,185
NIGHT TIME POPULATION	526,369	64%	299,011
SQUARE MILES	98	40%	148
POPULATION DENSITY IN SQ. MILES	5,371	73%	2,020
HOUSEHOLDS 1970	189,218	68%	90,407
HOUSEHOLDS 1990	202,023	65%	106,857
DWELLING UNITS 1970	191,531	68%	91,780
DWELLING UNITS 1990	212,344	65%	112,473
RESIDENTS COMMUTING 25 TO 29 MIN.	13,326	62%	8,300
RESIDENTS COMMUTING 30 TO 34 MIN.	32,844	65%	17,399
RESIDENTS COMMUTING 45 TO 59 MIN.	18,792	60%	12,523
HOUSEHOLDS WITH NO CARS IN 1990	21,573	79%	5,786
HOUSEHOLDS WITH ONE CAR IN 1990	78,516	72%	29,971
HOUSEHOLDS WITH 2 CARS IN 1990	72,123	61%	46,700
HOUSEHOLDS WITH 3 CARS IN 1990	29,811	55%	24,400
TOTAL FLOOR AREA IN 1991	970	66%	489
WHITE	168,819	64%	96,532
BLACK	11,832	92%	1,000
ASIAN	8,775	57%	6,583
HISPANIC	12,164	82%	2,670
UNEMPLOYED	14,508	72%	5,746
COMMUTERS	267,719	64%	150,121
PLACES OF WORK	24,126	64%	37,854

Other of the Core's features -- showing its sustained role in these categories -- are also displayed (Figures 19 - 24). Also depicted are such relationships as:

- Population Distribution by Municipality, past, present and future ;
- Population Density by Municipality, past, present and future;
- Employment Distribution by Municipality, past, present and future; and
- Transit Density (Population Plus Employment per Square Mile) by Municipality, past, present and future.

Displayed, as well, here, is the mismatch between rail commuter ridership within this core as contrasted in contrast with the remainder of the county (Figure 25).

Figure 19.

Population has and will concentrate in our Core

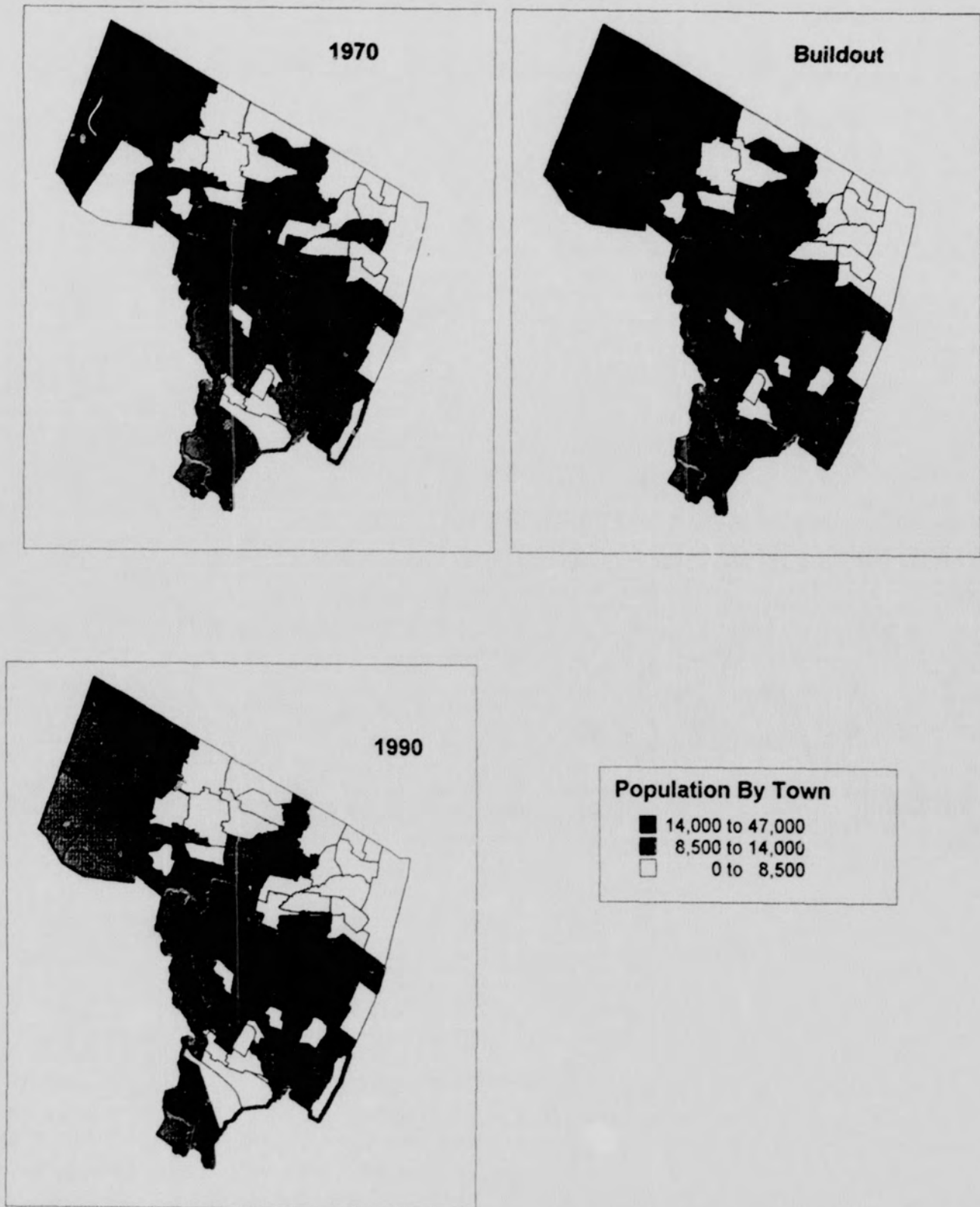


Figure 20.

Population Density has and will concentrate in our Core



Figure 21.

Employment has and will concentrate in our Core

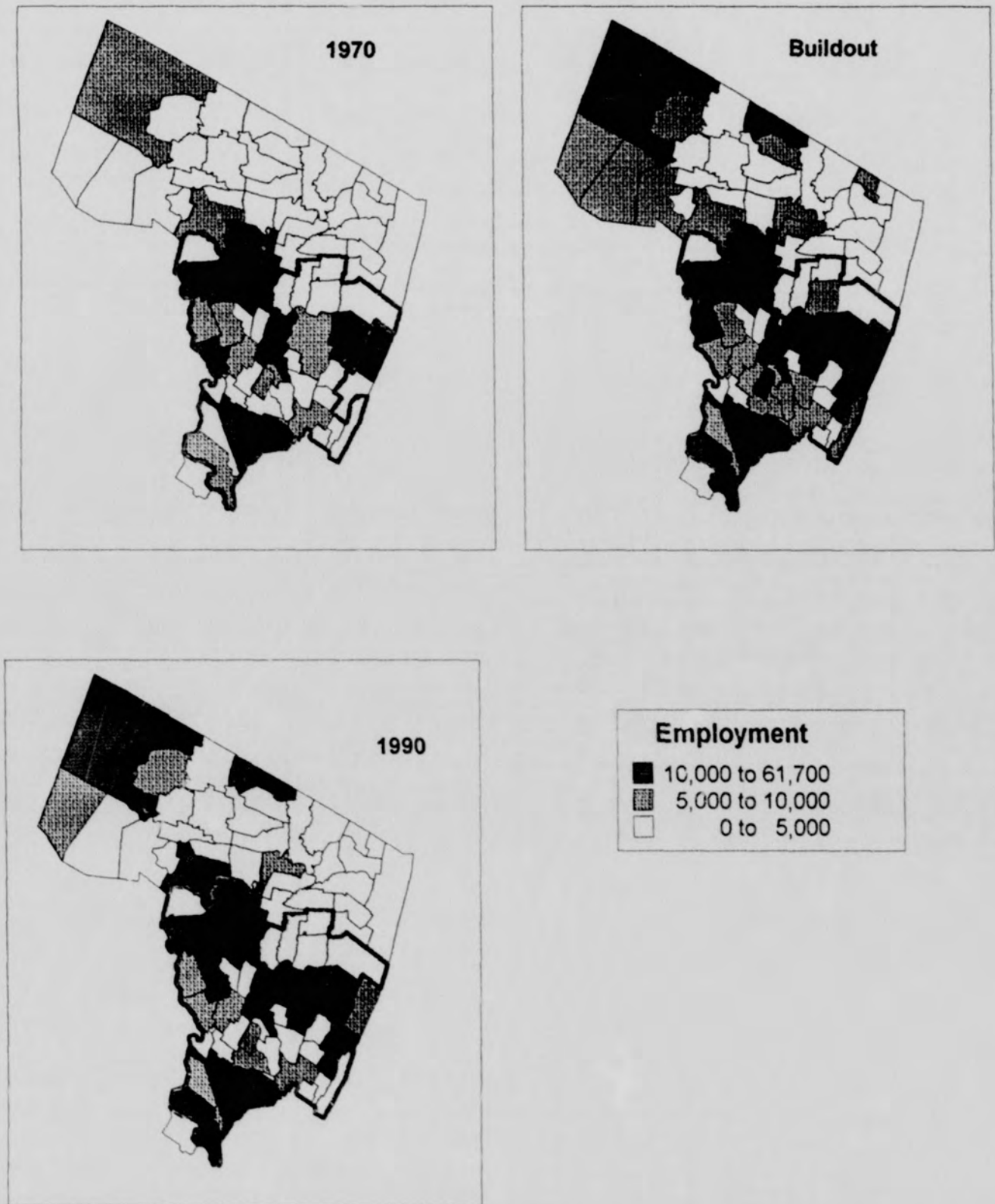
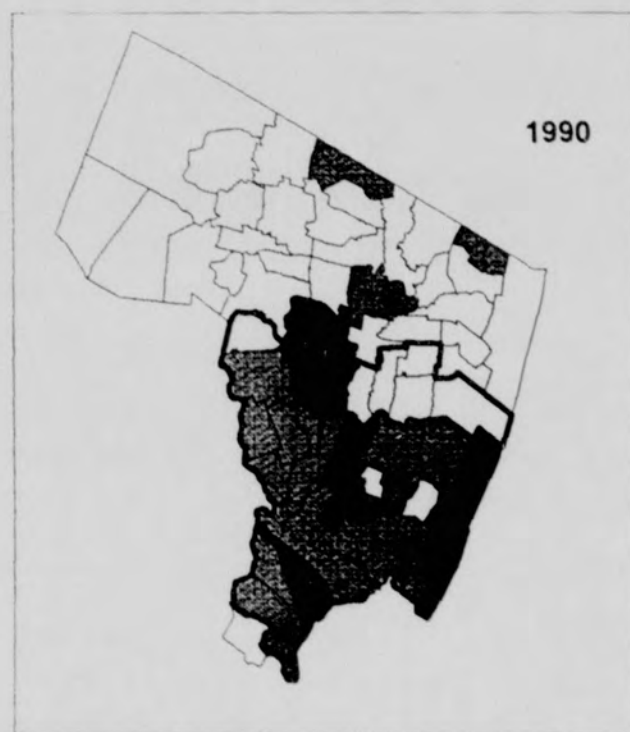
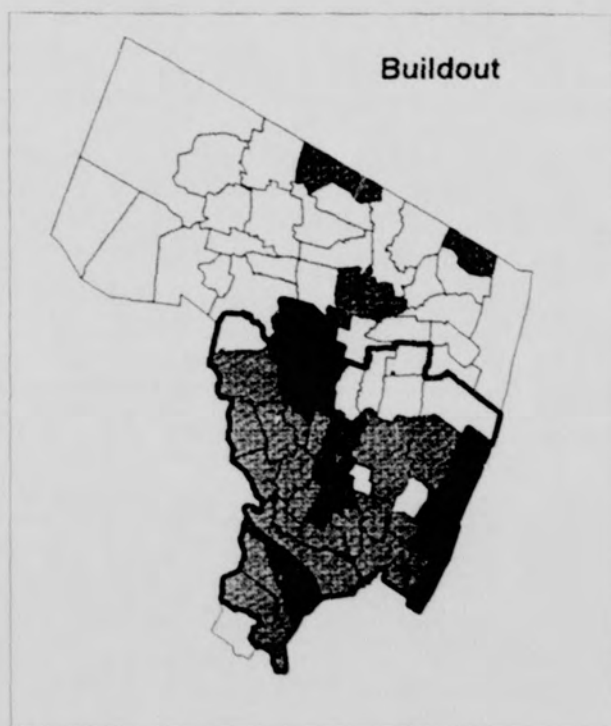
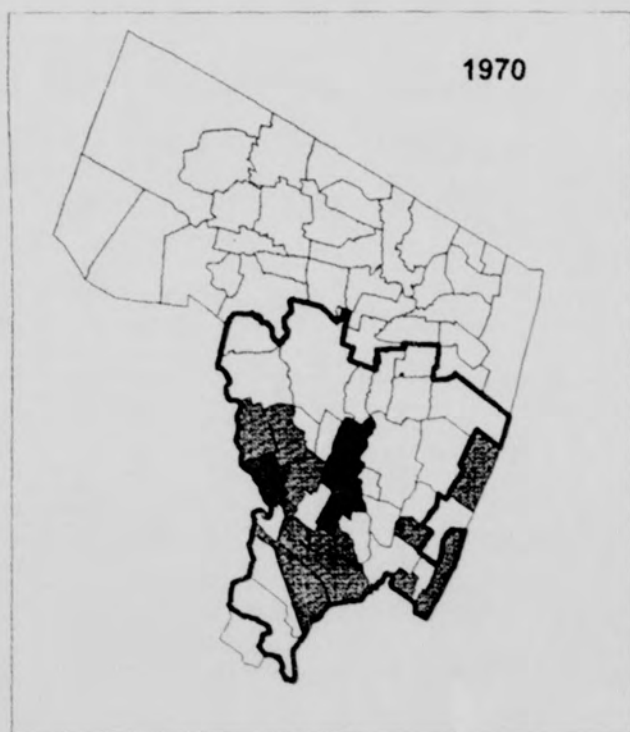
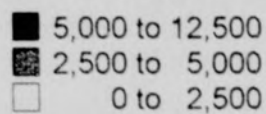


Figure 22.

Employment Density has and will concentrate in our Core



Jobs Per Square Mile



Year	1970	1990	Buildout
Land Area in Sq. Miles			
Core	94	94	94
Rest Of County	141	141	141
County	234	234	234
Percent in Core	40%	40%	40%
Employment Density Per Sq			
Core	2,327	3,206	4,131
Rest Of County	531	971	1,239
County	1,249	1,865	2,396

Figure 23.

Transit Density has and will concentrate in our Core



Daytime & Nighttime Population In Bergen County In 1990

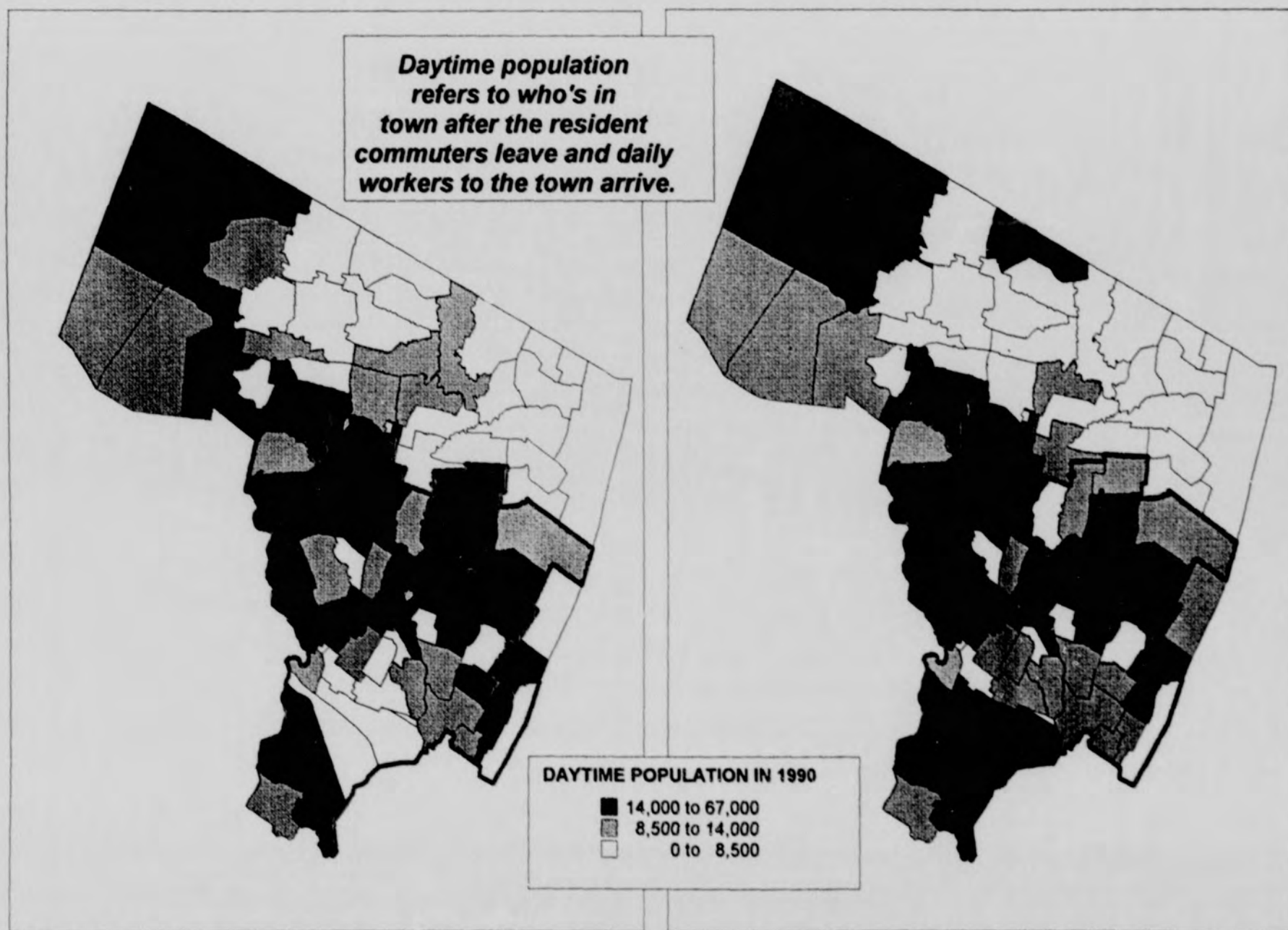
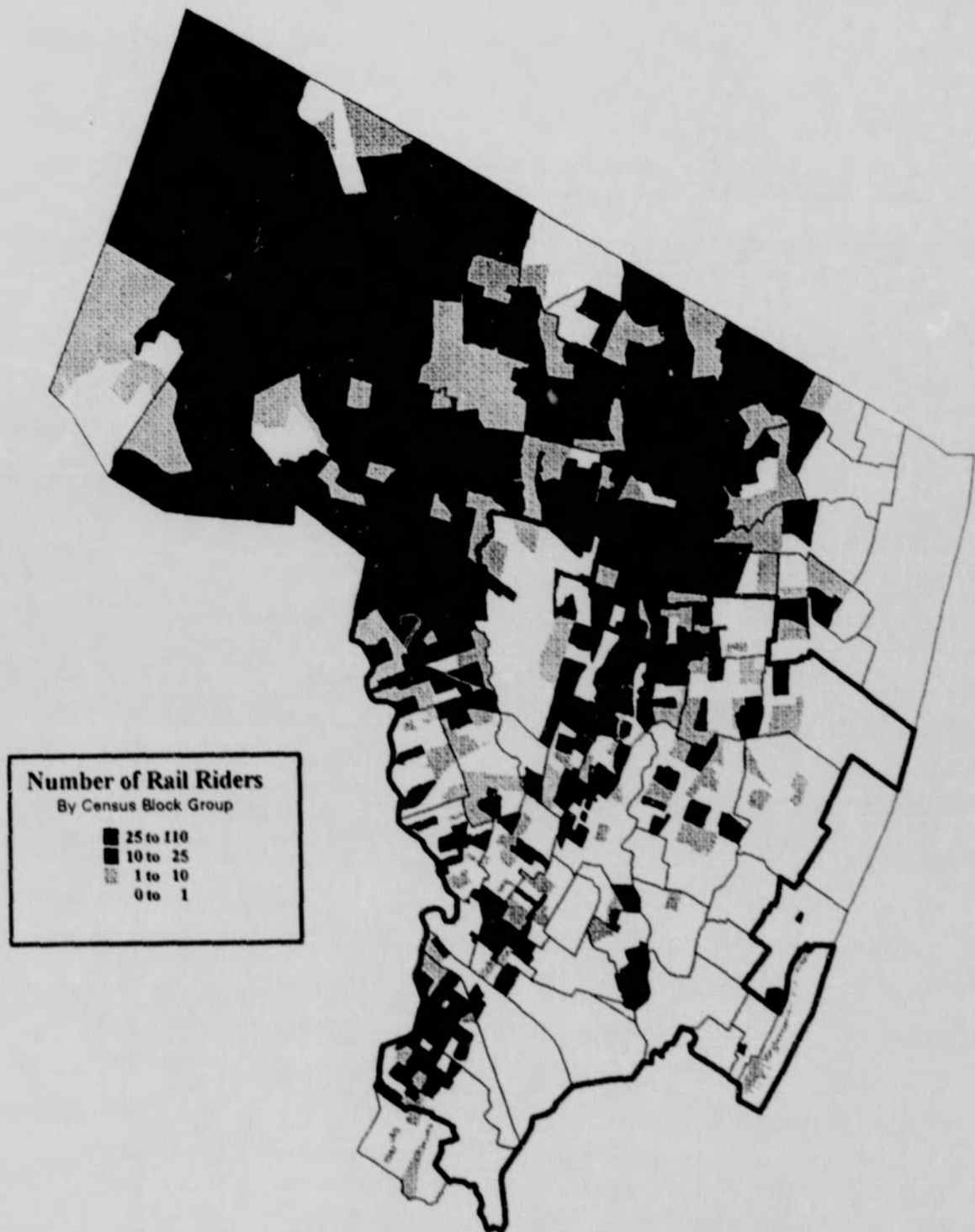


Figure 24.

Figure 25.

Number of Rail Commuters in Bergen County, 1990



Unrelieved Congestion as Consequence.

In our search to find where and how these land uses in the Core best reinforce one another in the transit opportunities they are capable of spawning, we have also discovered and catalogued the following:

- three times the car trips per square mile in the core than we find within the remaining 60% of the county (Figure 26);
- the core contains the most highly congested portions of the county, because here is where the worst traffic entanglements in the county occur all day long between *regional travelers streaming into the county from without to work, shop or pass through to more distant destinations, and the local voyages of our residents to places of work and other destinations inside the county and beyond* (Figure 27). As noted, this traffic, an earlier signal of economic success, has now become a suffocating force. A series of graphics illustrates these points;
- the preponderant *growth capacity* of the core, measured in land available as zoned, and in terms of transportation capacity *unavailable to support that growth*;
 - the relatively small share of in-core commuting that commuter rail transit carries today *from the core to the region beyond and the negligible share from the region into the core*. Only 2% of Bergen's 420,000 residents who leave for work each morning take the commuter rail service offered at today's 28 stations on the Main, Bergen and Pascack Valley lines;
 - the near impossibility of expanding existing road and bus capacity *to sustain the core's present economic strength into the future*; the long standing absence of east-west roadway AND transit capacity *in the core, within the county at large, and within the region whose transportation facilities extend us the possibilities that are ours to use, influence, and to adapt to in the transit-friendly development and redevelopment planning we are capable of putting into place*; and of great significance; and,
 - *realizable rail capacity within the core that can fill key transportation voids to highly positive results using existing rail rights-of-way. Our findings about this last characteristic are described below.*

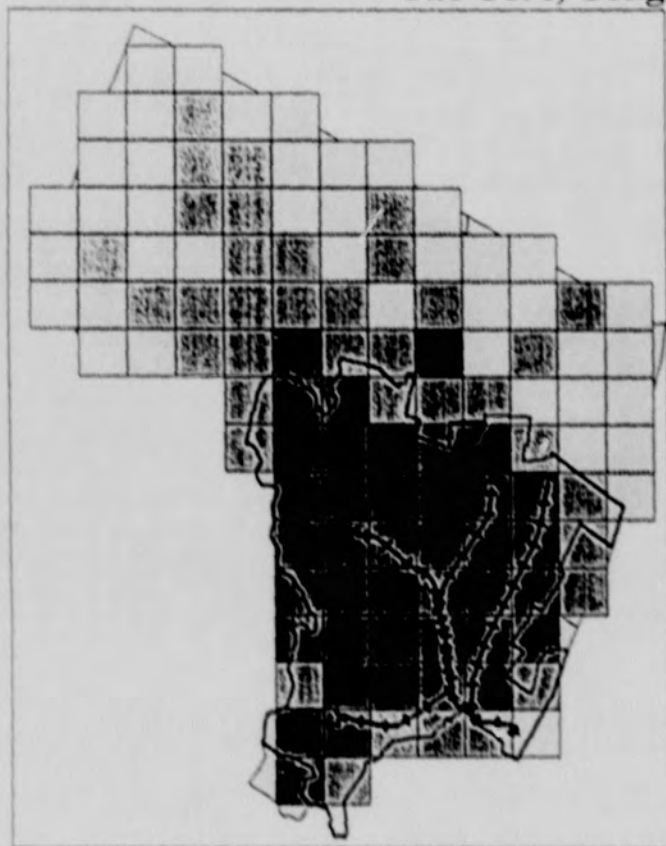
Three Rail Transit Options Under Study for Eastern Bergen County.

As summarized above, the County's Core was identified and evaluated in the contrast of its key features with the remaining 60% of the County's land mass.

At this point, the inquiry becomes finer grained. The following maps, charts and graphics (Figures 28-33) summarize this evaluative process as applied to each of the three rail lines under the joint Major Investment Study being conducted by New Jersey Transit and Bergen County:

- **all or part of the West Shore Line;**
- **all or part of the Northern Branch Line; and**
- **a portion of the New York Susquehanna line from I-80/Garden State Parkway to the Vince Lombardi Park Ride in Ridgefield, with an additional leg northward from the Weehawken Light Rail Terminal/NY Waterways Ferry on the Hudson Bergen Light Rail Transit line. Its name is the Cross County Line.**

The Core, Congestion, and Rail Service



The core is where the county's highest concentrations of congestion are found - right where the highest employment and population concentrations are also located. This graphic shows that the number of trips per square mile *inside the core area* is three times larger than the number *in the balance of the county*.

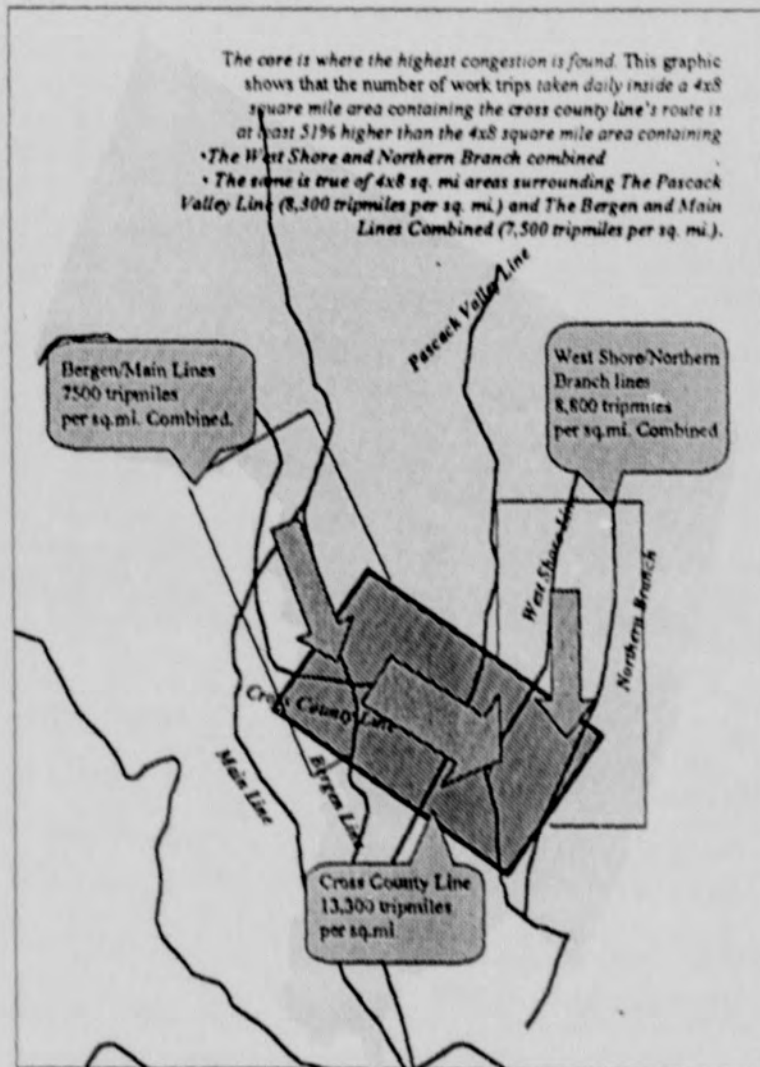


Figure 26.

Figure 27.

ROADWAY CONGESTION INTENSITY BERGEN COUNTY



Figure 28.

Rail Transit Network Serving The Core

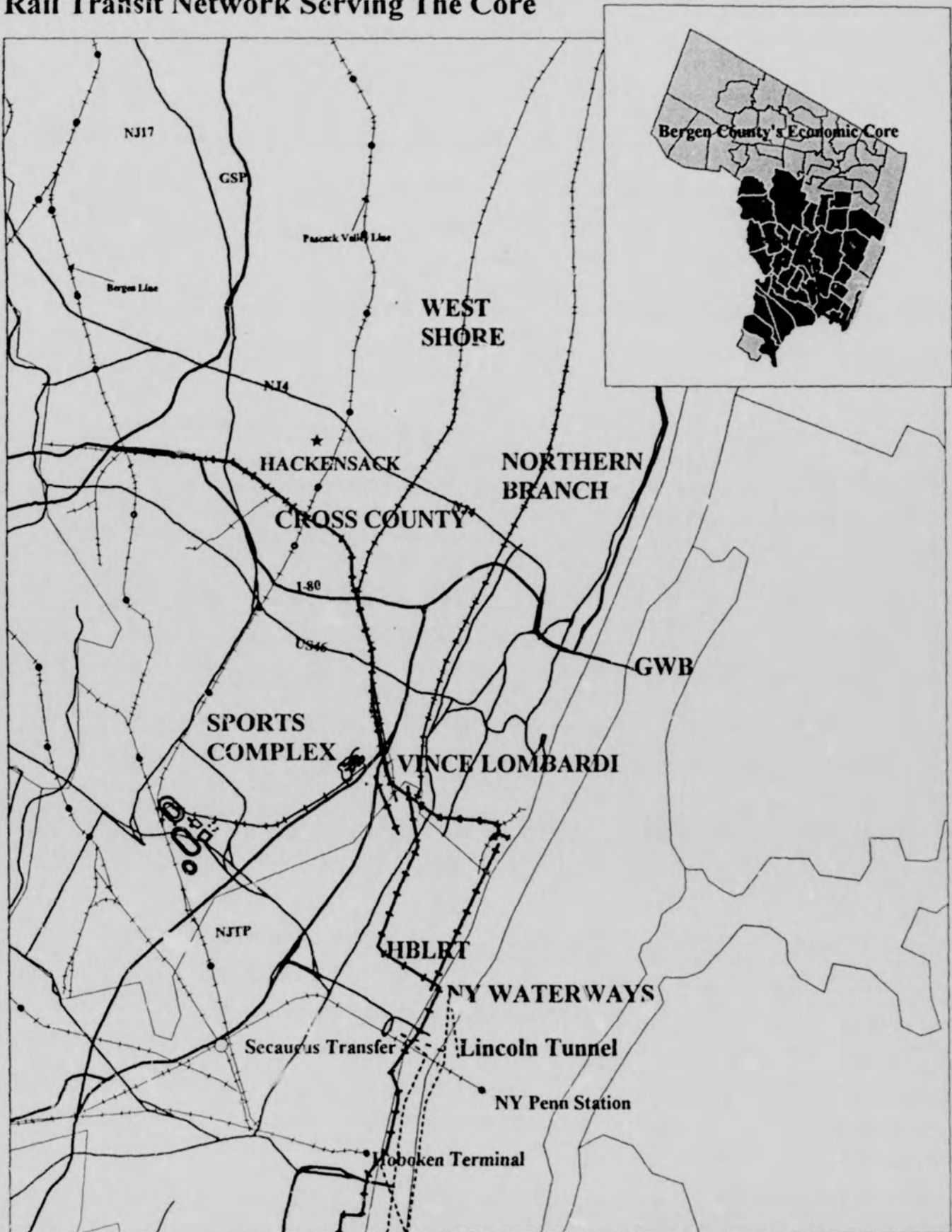
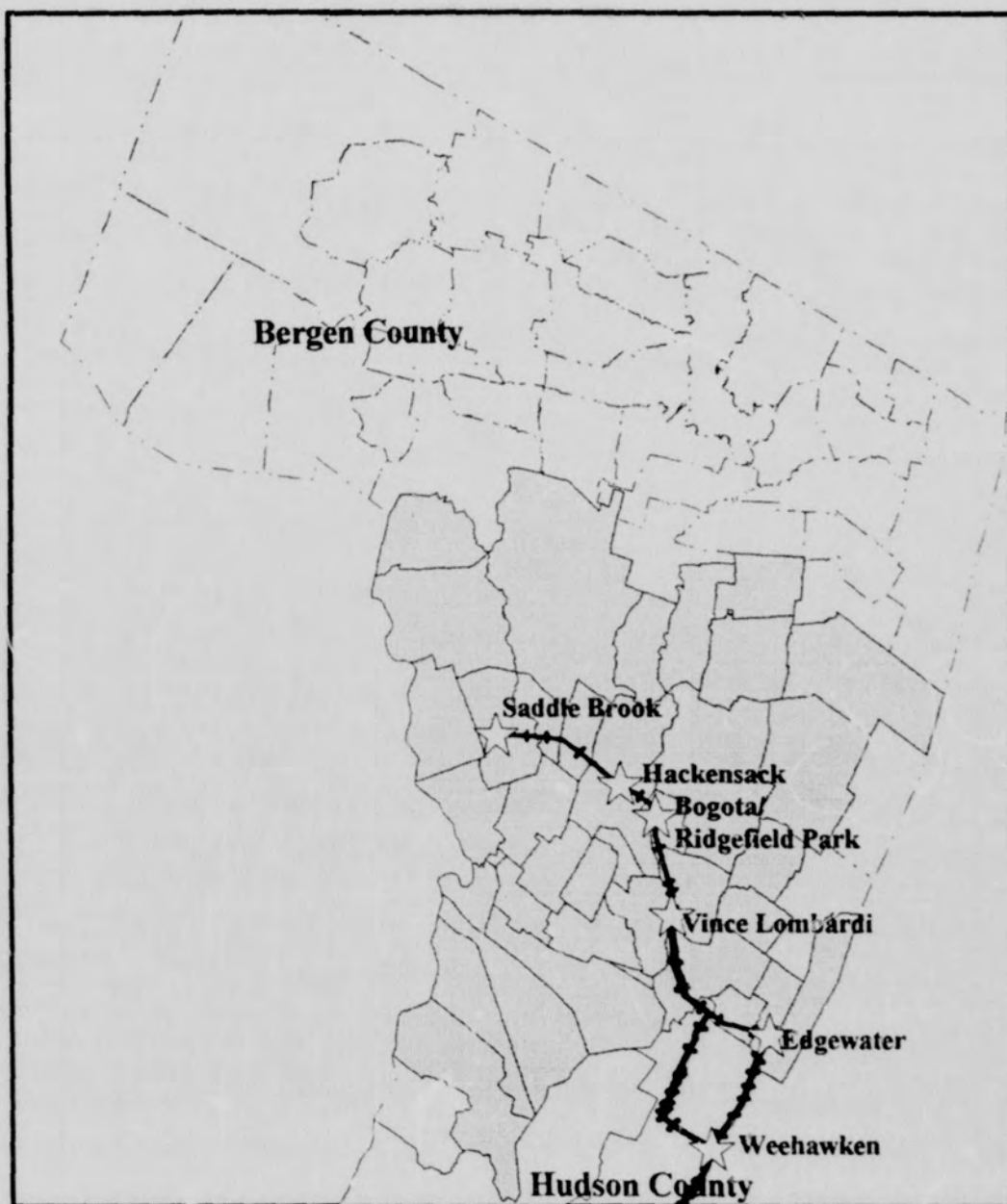


Figure 29.



Bergen County's Economic Core occupies 40% of the county's land base. Traversed by the Cross County Line's 3 segments, this core contains:

- 70% of the County's 420,000 residents in the work force
- 72% of the County's 550,000 jobs
- 64% of the County's population of 845,000
- 65% of the County's 310,000 households
- 64% of the County's 417,840 commuters

FEATURES OF BERGEN COUNTY'S RAIL CORRIDORS:
CROSS-COUNTY, NORTHERN BRANCH & WEST SHORE

CATEGORY	CROSS-COUNTY CORRIDOR	AS % OF COUNTY TOTAL	NORTHERN BRANCH CORRIDOR	AS % OF COUNTY TOTAL	WEST SHORE CORRIDOR	AS % OF COUNTY TOTAL
Population in 1990	183,942	22.29	81,806	9.91	119,733	14.51
Covered Employment in 1990	96,599	24.38	32,586	8.22	29,995	7.57
Covered Employment in 1980	87,995	25.86	28,858	8.48	25,850	7.60
Resident Commuters in 1990	79,163	23.09	30,727	8.96	52,459	15.30
Daytime Population in 1990	212,173	25.71	86,551	10.49	101,451	12.29
Square Miles	25	10.33	16	6.61	17.4	7.30
Population Density in Sq. Miles	7,456	215.66	5,181	149.85	6,873	198.80
Households in 1970	61,901	23.21	28,141	10.06	42,640	15.25
Households in 1990	74,738	24.20	30,491	9.87	43,697	14.15
Dwelling Units in 1970	67,336	23.77	28,575	10.09	42,680	15.06
Dwelling Units in 1990	79,667	24.53	32,487	10.00	45,200	13.92
Residents Commuting 25 to 29 min.	4,932	22.81	2,264	10.47	2,989	13.82
Residents Commuting 30 to 34 min.	11,441	22.77	5,538	11.02	7,733	15.39
Residents Commuting 45 to 59 min.	6,053	19.33	3,757	12.00	4,930	15.74
Residents Commuting 60 to 89 min.	6,991	17.71	4,326	10.96	5,963	15.10
Households w/no Cars 1990	9,268	33.88	3,931	14.37	4,174	15.26
Households w/1 Car in 1990	32,098	29.59	12,307	11.34	15,661	14.44
Households w/2 Cars in 1990	24,206	20.37	10,722	9.02	16,975	14.29
Households w/3 Cars in 1990	9,160	16.90	3,890	7.18	6,887	12.70
No. of Places of Work - 1996 *	6,939	18.33	3,629	9.59	3,378	8.92
No. of Employees - 1996 *	82,160	17.37	33,501	7.08	32,590	6.89
Tax Contribution	\$13,599,486,961	16.73	\$8,904,822,202	10.96	\$8,065,108,956	9.92

* Based on 1996 Equifax

Source: Planner's Data Book for Bergen County: Vol. 1, 1987, 1995

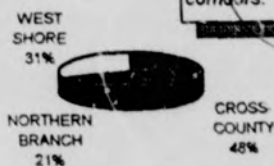
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Figure 30.

Figure 31.

THE THREE RAIL CORRIDORS

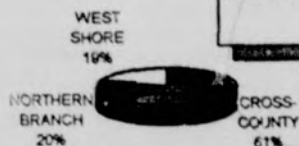
POPULATION 1990



Inside the Core and among the 3 Rail Corridors and study area in the MIS, The Cross-County corridor contains 48% of the population found in all three rail corridors.

CROSS-COUNTY	183,942
WEST SHORE	119,733
NORTHERN BRANCH	81,806

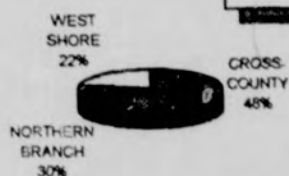
EMPLOYMENT 1990



The Cross-County Corridor contains 61% of the employment found in all 3 rail corridors under study.

CROSS-COUNTY	96,599
WEST SHORE	29,995
NORTHERN BRANCH	32,586

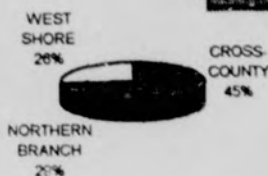
PLACES OF WORK



Protect and grow from real estate value in place.

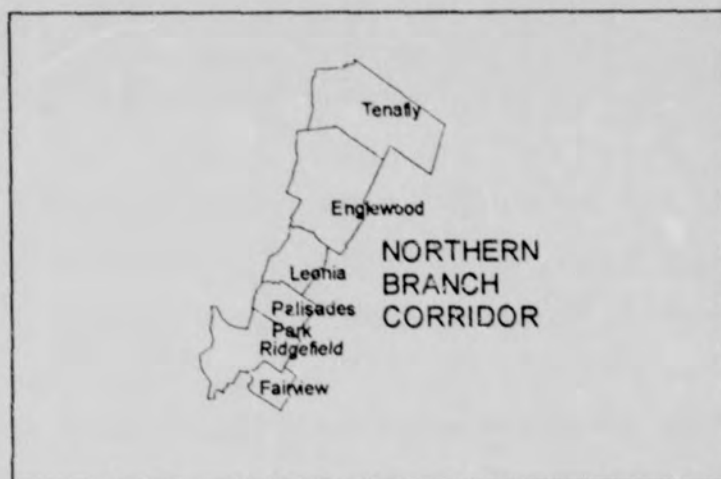
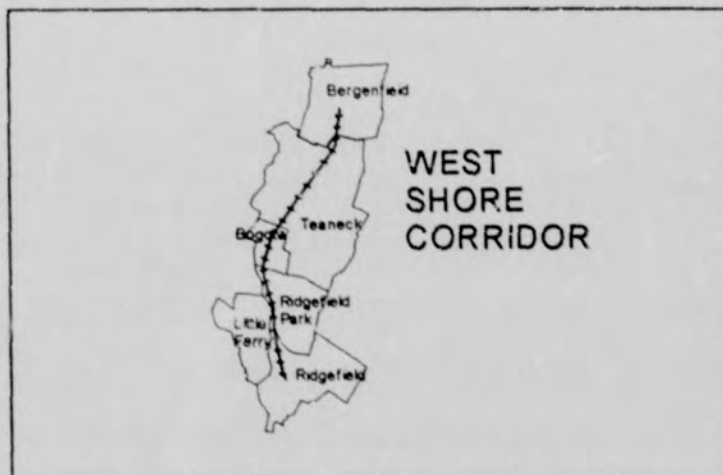
CROSS-COUNTY	7,233
WEST SHORE	3,378
NORTHERN BRANCH	4,594

REAL ESTATE VALUE



Nurture the economic stability of population in place and grow from it.

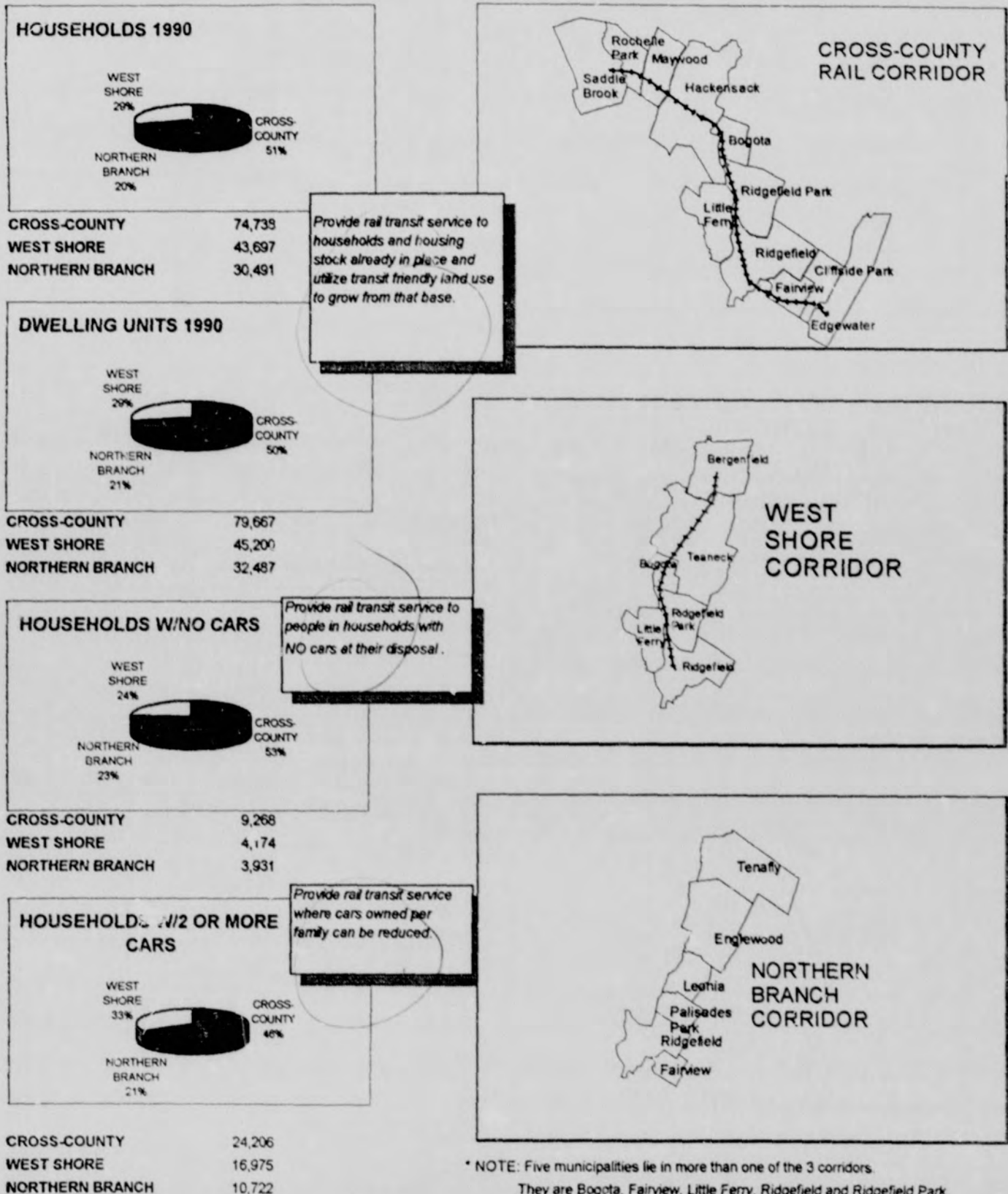
CROSS-COUNTY	\$13,599,486,961
WEST SHORE	\$8,065,108,956
NORTHERN BRANCH	\$8,904,822,202

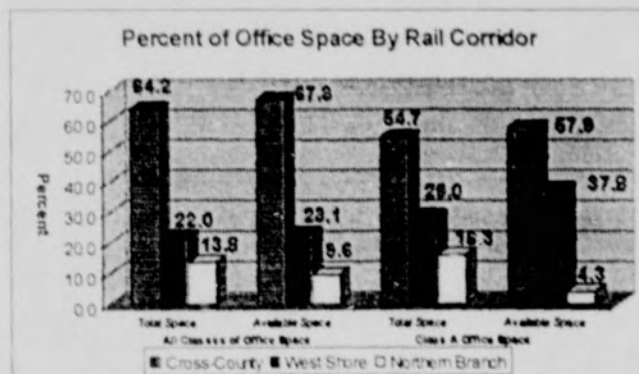
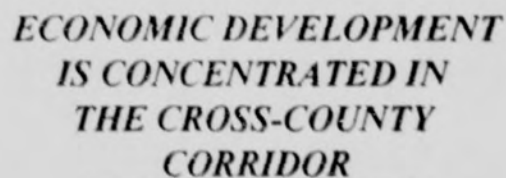


* NOTE: Five municipalities lie in more than one of the 3 corridors. They are Bogota, Fairview, Little Ferry, Ridgefield and Ridgefield Park.

Figure 32.

THE THREE RAIL CORRIDORS





The blue bars show that the Cross-County Corridor contains by far, the most office space, available (or vacant) office space, Class A office space, and Class A office space available (or vacant) of all the rail corridors combined. The Cross-County Corridor also contributes the greatest percent in tax rateables of the 3 corridors combined.

Intelligent Transit Systems Link Roads to Rails.

A fifth initiative, one which some of you have seen (Lodi, Hackensack, Rochelle Park, Maywood, Teterboro, South Hackensack, Bogota, Teaneck, Paramus, River Edge and Saddle Brook in some exploratory public outreach), is something we call the Community Commuter.

Designed as an integral part of this multi-faceted transit solution, Bergen County's concept for a demand-responsive, 16 hour per day, customer generated van service has now been fleshed out as part of a simultaneous research effort funded by the North Jersey Transportation Planning Authority, the Metropolitan Planning Organization for our 13-county region. Because expanded transit carries with it an appropriately scaled set of parking opportunities for its new customers, and because we present this idea as a way to provide access to the Light Rail all day long as a way to minimize the need for new parking, we see the benefit of advancing the two companion projects together in integrated fashion for simultaneous implementation. The on-demand van system uses state-of-the-art Global Positioning technology, on-board computer access, and adapts existing software already developed for rail freight dispatching and for package delivery systems like those utilized by UPS. We are currently seeking funding for the first phase.

We see this kind of service as a superb complement to the Light Rail transit opportunities advanced here, and for greater commuter rail access without having to rely completely on expanded parking lots at or near the center of town. *As narrated in our study (see Figures 34 to 36 beginning on the next page), this on-demand van system, utilizing small loops or a large network we picture as overlaying much of the County's core, has dozens of other applications as well.*

Figure 34.

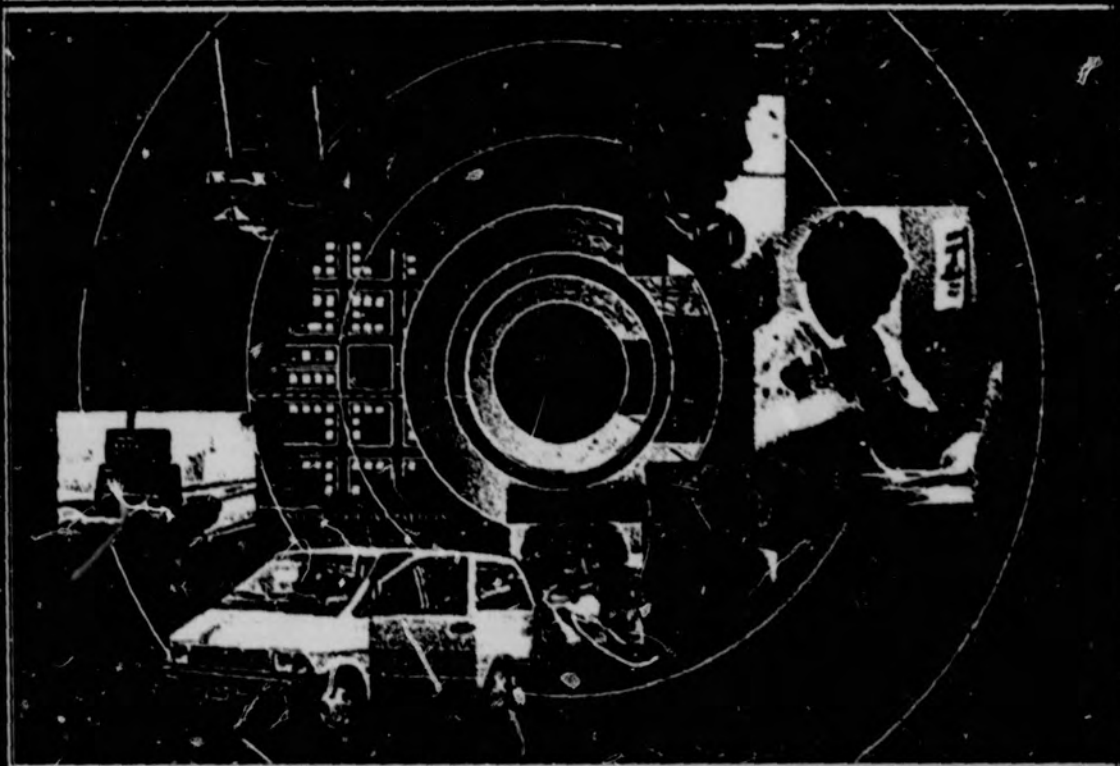


THE COMMUNITY COMMUTER TRANSIT FOR SUBURBAN AMERICA

BERGEN COUNTY TRANSIT ENHANCEMENT STUDY

F-2215

EXECUTIVE SUMMARY



Prepared for
Bergen County Department of Planning and Economic Development
by

A. Nelessen Associates, Inc.

in association with

SG Associates, Inc.,

HNTB, Inc.

October, 1996



Figure 36.



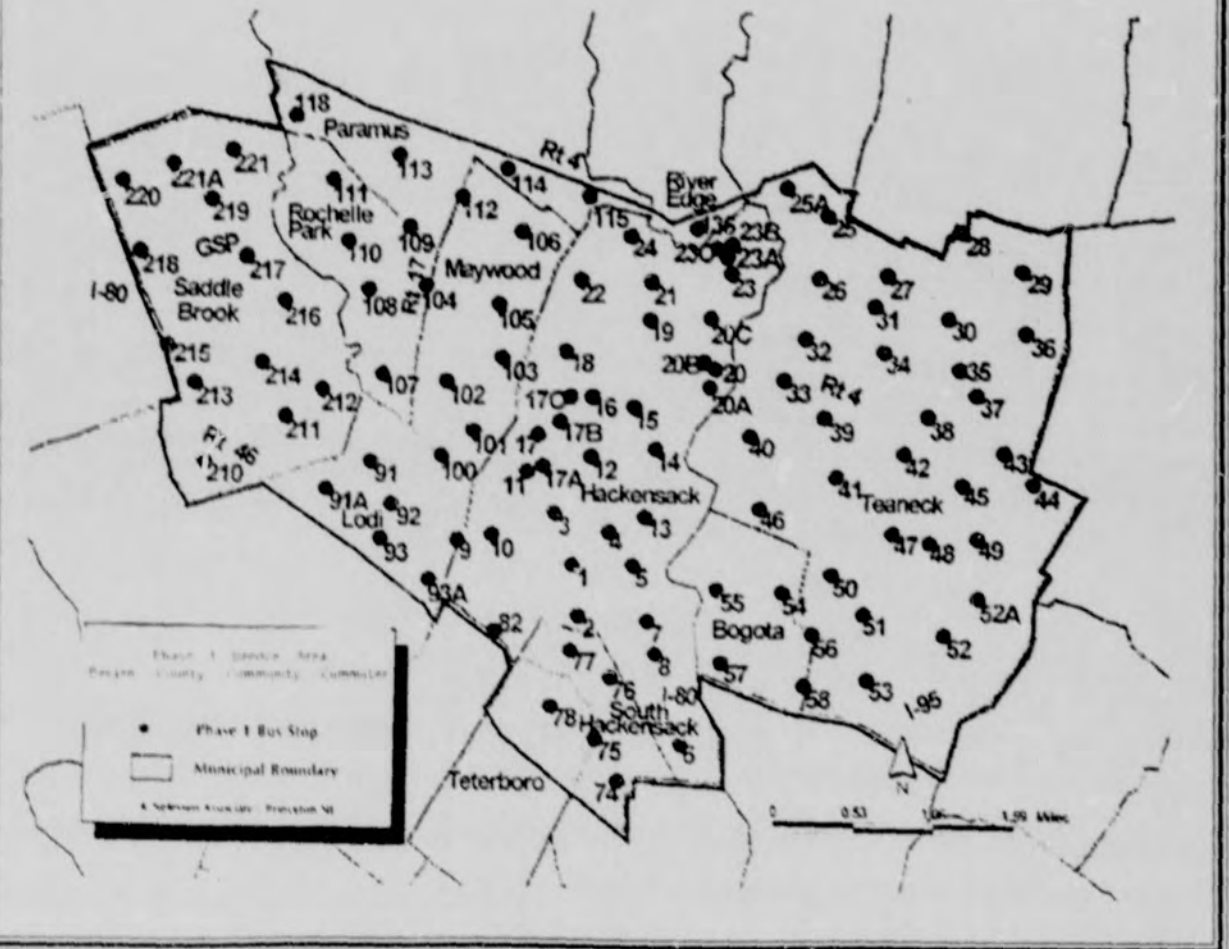
Service Area

Hackensack was selected as the "center" of the study area because of its high ratio of jobs to housing. From there, an initial market area for the service was selected by driving **fifteen minutes** from the county courthouse in all directions during weekday and weekend peak hours, as well as the mid-morning, midday and evening hours. The map below indicates the extent of the area.

In order to further contain the scope of this experiment and the costs for start-up service, this initial market area was further reduced to a first phase service area shown below.

Eleven (11) towns are included in the first phase service area. Of these eleven towns, eight are totally within the service area and three are partially within in the service area. The first phase service area contains:

- an 18 square mile area
- 123, 945 residents;
- over 62,787 jobs;
- 28,904 AM work trips made by people who live and work in first phase service area;
- 57,808 total work trips;
- 371,835 total trips (assuming that work trips are approximately 16% of total trips).



Executive Summary

Economic Performances Influences the Choice of Technology.

In selecting a rail transit technology which provides the best match to the new all-day economy?

Which investment choices, considered in combination, offer us the best opportunities to connect productively together, for the first time, the now separate and distinct elements of our present transportation network — our highways and Interstates?

Which rail transit alternative is the best choice in this arena as the first buildable stage of a larger network of choices not foreclosed but advanced in their possibilities by such a choice?

Summary and Conclusions

There are two "Since" themes in this planning essay:

I. *Since 1950*, when they used the parts of the today's transportation system that were available then, but for different purposes and to travel to different destinations than we travel to today. So it was a *network* back then. The linebackers, safeties, and interior linemen functioned as a unit.

Back then, the Interstate Highways were popping up all over the country. But their consequences for land development had not yet taken hold. *The economy and its transportation support systems, and the land settlement patterns that are the consequences of both in combination, were focused predominantly at the region's center.* All three were centralized. The further one traveled from the center, the lower the population densities and the more rural the landscapes became.

Transportation, with common and central destinations, could pursue economies of scale with considerable efficiency and ease of choice.

No longer.

Between 1950 and 1990, our economy and its geography have changed enormously, converting yesterday's network into a series of pieces that do not work well today for most of the trips most of us now take across most of the day. These prodigious changes were taking place over a 40 year period during which, save for the Interstates, investment in public infrastructure, including in transportation, was dropping from 2.5% of GNP in 1950 to 1.0% in 1990 during a period of unprecedented population and employment growth in the nation and in our state.

The automobile, with which we are said to have fallen irrationally in love, solved these economic and transportation mismatches for awhile. And it has also helped create the other mismatches we face today. But along with the buses and trucks that have helped

STB

FD-33388

2-2-98

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ID-CITIES

*Board of Trustees of
Vermilion Township
P.O. Box 83
Vermilion, Ohio 44089*



*Clerk's Office
216-967-3251*

January 28, 1998

Office of the Secretary
Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K Street, NW
Washington, D.C. 20423-0001

**ENVIRONMENTAL
DOCUMENT**

Attention: Elaine K. Kaiser
Environmental Project Director
Environmental Filing

Dear Sir or Madam:

We are writing to express our concerns regarding the proposed acquisition of Conrail by Norfolk and Southern Railroad and CSX Railroad.

Vermilion Township is targeted to receive a proposed connection that will join Conrail and Norfolk and Southern rail lines on Coen Road. This connection will cause added congestion to traffic in the Vermilion City and Vermilion Township areas. This increased activity will have an enormous impact on crossings being blocked to emergency vehicles, pedestrians and other modes of transportation. Hazardous material is also a concern to all affected by the increased use of the rail system in this area. Crossing gates and lights are a priority in this area for any new intersection that will be added because Coen Road is a heavily traveled roadway to by pass Vermilion.

Vermilion Township has experienced severe seasonal drainage problems in the area targeted for the new connection. A large area to the south is drained by the culverts under the railroad and the size of these culverts would need to be increased to provide adequate drainage.

Vermilion Township also has two railroad crossings not protected by crossing gates and lights just west of the new merge area, which are on the Norfolk and Southern line. They are the Stanley Road crossing and the Barnes Road crossing. These two crossings will need gates and lights because of the proposed increase of train traffic.

Office of the Secretary

January 28, 1998

Page 2

To sum up our concerns, safety and drainage are a priority and unless these concerns are resolved to our satisfaction, we must oppose the merger.

Preservation of public peace, health and safety have always been a priority in Vermilion Township, and one in which we wish not to compromise.

Sincerely,

Board of Trustees
Vermilion Township

Charles W. Kishman, Chairman

Charles W. Kishman

Janet E. Knittle, Trustee

Janet E. Knittle

Donald J. Kishman, Trustee

Donald J. Kishman

cc Erie County Commissioner's Office

STB

FD-33388

2-2-98

K

ID-GOV

ENVIRONMENTAL DOCUMENT



PENNSYLVANIA TURNPIKE COMMISSION

COMMONWEALTH OF PENNSYLVANIA
Post Office Box 67676
Harrisburg, PA 17106-7676
January 30, 1998



Office of Secretary
Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K Street NW
Washington, DC 20423-0001

Attn: Ms. Elaine K. Kaiser
Environmental Project Director
Section of Environmental Analysis (SEA)

**RE: Environmental Filing
Proposed Conrail Acquisition**

Dear Ms. Kaiser:

The Pennsylvania Turnpike Commission is grateful for the opportunity to comment on the *December 12, 1997, Draft Environmental Impact Statement (DEIS)* for the Proposed Conrail Acquisition. For the past eight years, the Pennsylvania Turnpike Commission has been planning improvements for the regional transportation system for Southwestern Pennsylvania. The result is a multi-billion dollar expansion program that consists of more than 90 miles of new roadway which includes a program of seven independent projects that comprise the Mon/Fayette Expressway and Southern Beltway Projects (see attached regional map). Attached to this letter as part of our comments, we have included testimony presented by the Pennsylvania Turnpike Commission to the Pennsylvania State House Transportation Committee on Conrail Acquisition.

The Mon/Fayette Expressway and Southern Beltway Projects have been authorized and funded through three acts of the Pennsylvania General Assembly (Act 61 in 1985, Act 26 in 1991, and Act 3 in 1997). All of the seven projects comprising more than 90 miles of toll road expansion in Southwestern Pennsylvania have been approved in accordance with the Federal Joint Planning Regulations which were promulgated subsequent to passage of the Intermodal Surface Transportation Efficiency Act (ISTEA). In particular, the Mon/Fayette Expressway project from PA 51 to Pittsburgh, which has the most involvement with existing Conrail and CSX rail lines, is included on the Long Range Plan for the Southwestern Pennsylvania Regional Planning Commission (SPRPC) as well as the Regional Transportation Improvement Plan (TIP). In addition, a combined Congestion Management Study (CMS)/Major Investment Study (MIS) for this project has been completed in accordance with 23 CFR 450.318 (and related regulations). Both the CMS and MIS have been approved by SPRPC with input from the Pennsylvania Department of Transportation and the Federal Highway Administration in accordance with applicable Federal Regulations. In summary, this project is well along in the planning process and has received all required Federal, State and Local planning approvals at this stage of project development. We have invested considerable time and money in this process and would hope that our plans could be coordinated with your plans for the benefit of Southwestern Pennsylvania.

January 30, 1998

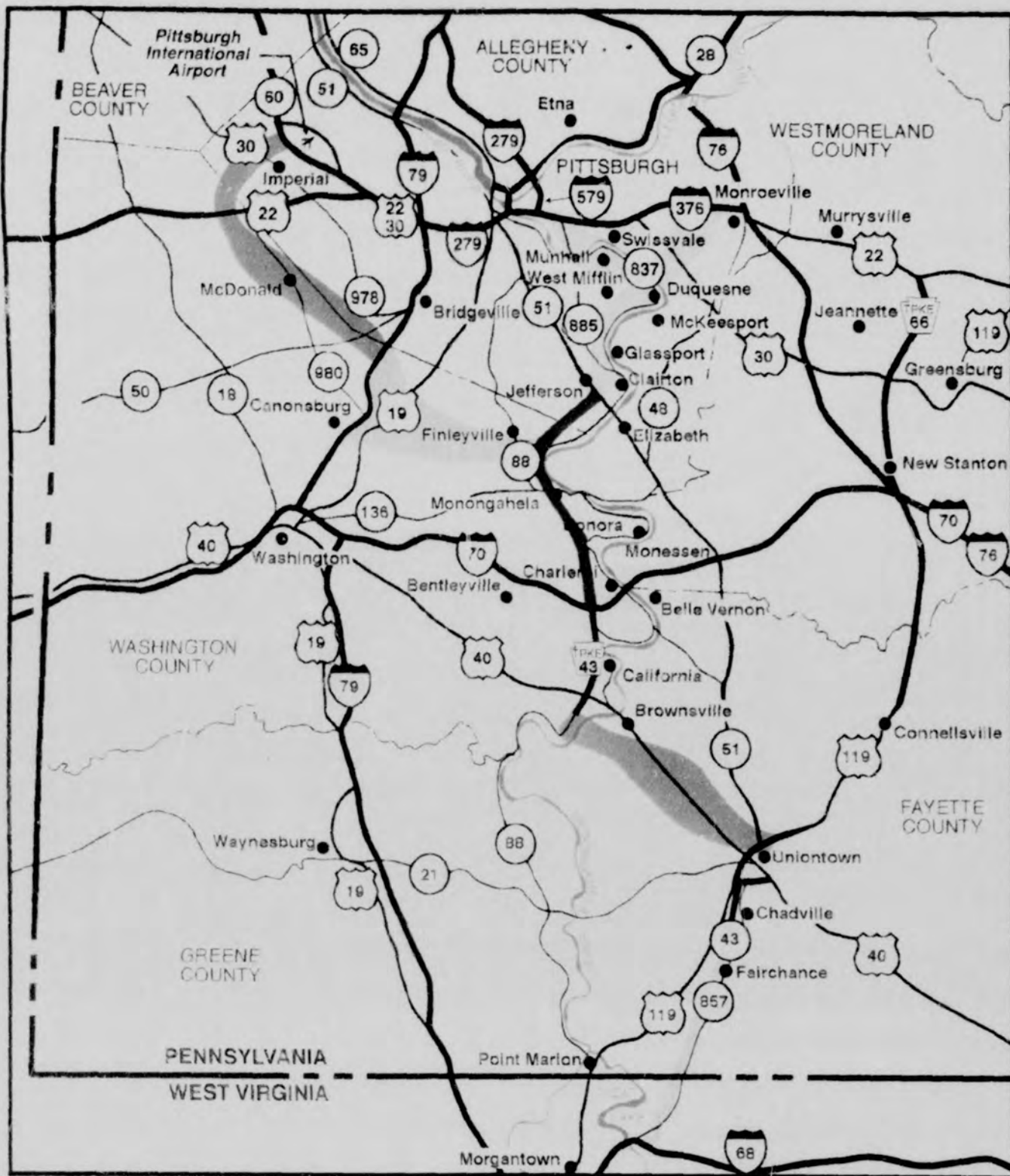
The Mon/Fayette Expressway and Southern Beltway projects have continued support from the Federal Highway Administration (FHWA). The following are our comments on the Proposed Conrail Acquisition, and the anticipated changes, as they relate to the Mon/Fayette Expressway and Southern Beltway Projects.

1. **Pitcairn Intermodal Facility** - The increased activity at the Pitcairn Intermodal Facility and its effect on the existing highway network and our proposed Mon/Fayette Expressway has not been addressed. As written, **Chapter 5-PA.10 Pennsylvania Transportation: Roadway Effects from Rail Facility Modifications** of the DEIS does not address impacts to the proposed roadway network.
2. **Increased Traffic on CSX Line - Attachment ES-B, Master Table of All Rail Line Segments** provides information on rail lines that appear to be involved under the Proposed Conrail Acquisition. Six of these rail segments (C-082, C-086, N-263, N-268, N-269, and N-270) are directly affected by the PA 51 to Pittsburgh Mon/Fayette Expressway Project. Rail line segments C-082 and C-086 are projected to increase by 74 and 77 percent (million gross tons), respectively. The preliminary design for the Mon/Fayette Expressway, specifically the PA 51 to Pittsburgh project, proposes the relocation of up to eight miles of this CSX track. The potential inability to relocate this track because of the increase in use of the line caused by the Proposed Conrail Acquisition may require us to reevaluate this highway alternative. We are concerned that this impact to our planned project was not considered in this DEIS and therefore mitigation for this impact may not be included in your potential approval of the Conrail Acquisition.
3. **Early Coordination** - As discussed above, there are six rail segments that appear to be directly affected by our PA 51 to Pittsburgh Mon/Fayette Expressway Project. Work will include bridging over, and the relocation of numerous railroad tracks, signals, communication, and other railroad facilities. **Attachment ES-B** indicates that all six rail segments are expected to remain in use after the Proposed Conrail Acquisition. Early coordination with Conrail, Norfolk Southern and CSX during the Preliminary Design phase of our project is necessary for its successful completion. In some cases, the railroad involvements are so substantial that the proposed highway alternatives may not be feasible without total commitment for cooperation by the owners of the railroad facilities. We request that this issue be described along with SEA's recommendation for mitigation in **Chapter 5-PA.16 Pennsylvania Area of Concerns**.

The Turnpike Commission would like to acknowledge that initial coordination with Conrail and Norfolk Southern took place during a meeting on January 20, 1998. In addition, there has been contact between the Turnpike Commission and CSX. While the Turnpike Commission has raised a few of these comments of concern to Conrail, CSX and Norfolk Southern, these issues have not been totally resolved. We request that the SEA consider these issues during their review of State and Agency Comments on the DEIS and their discussion of mitigation measures. The success of the Mon/Fayette Expressway and the improvements to the regional transportation system in Southwestern Pennsylvania which would also support efficient railroad operations, depend on the successful coordination of all parties. If you have any questions regarding the issues we have raised, or require additional information, please call me at (717) 986-9688.

Sincerely,

David P. Willis for
David E. Zazworsky, P.E.
Special Assistant to the
Turnpike Commissioners



MON/FAYETTE EXPRESSWAY AND SOUTHERN BELTWAY PROJECTS



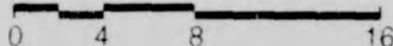
Pennsylvania Turnpike Commission

Commonwealth of Pennsylvania
P.O. Box 67676
Harrisburg, PA 17106-7676

Prepared By: McCormick, Taylor & Associates, Inc.
REVISED: 11-3-97



Scale: 1" = approx 8 miles



MON/FAYETTE

- I-68 to Route 43 (ROD 9/94)
- Uniontown to Brownsville
- I-70 to PA-51 (ROD 5/94)
- PA-51 to Pittsburgh

SOUTHERN BELTWAY

- PA-60 to US-22
- US-22 to I-79
- I-79 to Mon/Fayette

**Testimony of John T. Martino
Legislative Liaison
Pennsylvania Turnpike Commission**

**Submitted to:
Pennsylvania House Transportation Committee
Honorable Richard A. Geist, Chairman**

**Presented:
October 16, 1997**

**Testimony to the
Pennsylvania House Transportation Committee
Concerning the Acquisition of Conrail
by CSX and Norfolk Southern**

Chairman Geist, and other members of the Pennsylvania House Transportation Committee, I want to thank you for the opportunity to come before your Committee today with testimony concerning the proposed acquisition of Conrail by CSX and Norfolk Southern railroads.

The five-member Pennsylvania Turnpike Commission was created in 1937 with powers to construct, finance, operate and maintain the Pennsylvania Turnpike System. Since opening in 1940 with 160 miles of road, the Turnpike System has been continually growing, building and expanding. Currently, the Turnpike System consists of 506 miles of limited access highways.

In the mid-80's, the Turnpike Commission began an ambitious, multi-billion dollar expansion program. Authorization for these improvements came through three acts of the Pennsylvania General Assembly. In 1985, the General Assembly passed Act 61. This Act, the Turnpike Organization, Expansion and Toll Road Conversion Act, directed the Pennsylvania Turnpike Commission to construct and enhance the existing Turnpike and to expand the toll highway system. In 1991, Act 26 allocated 14 percent of a 55 mill increase of the Oil Company Franchise Tax to the Turnpike Commission which provides approximately \$40 million annually for the construction of Act 61 and Act 26 projects. In 1997, Act 3 provided the Commission with an additional \$28 million per year for Act 61 and Act 26 projects.

Among the projects authorized by these Acts are the Mon/Fayette Expressway and the Southern Beltway projects. Consisting of seven independent projects, the planned improvements stretch from the West Virginia border in the South to I-376 in Pittsburgh to the North, and from Jefferson Borough in the East, to the Pittsburgh International Airport in the West. These seven projects are shown on the attached color-coded map.

These transportation projects will bring much needed highway capacity, congestion relief, and highway access improvements; will stimulate economic development efforts; and will provide employment opportunities for Southwestern Pennsylvania. When all these projects are completed, the Commonwealth will have made a multi-billion dollar investment in the economic prosperity of Southwestern Pennsylvania.

A project critical to making the Mon/Fayette Expressway a reality, and the subject of our concern here today, is the proposed expressway from Route 51 in Jefferson Borough to I-376 in Pittsburgh and Monroeville. This highway will carry the most traffic of all the proposed projects, will provide an expressway alternative around the Squirrel Hill Tunnel, and will be a key component of a potential beltway south of the City of Pittsburgh. Currently, a Draft Environmental Impact Statement is being developed and is scheduled to be circulated in the Spring of 1998.

However, another equally important component of redevelopment and economic vitality for the region is efficient and effective rail service. Both highway and rail facilities are needed to provide the flexibility in transportation options needed for the movement of freight and people in the region. We wish to start working together now with the current or future owners of the railroads so that we can complete this needed improvement to the region's transportation network. This is our prime motivation for appearing before your Committee at this hearing today.

Construction of the Mon/Fayette Expressway from PA 51 to I-376 in Pittsburgh and Monroeville will require the bridging over and relocation of numerous railroad tracks, signals, communications and other railroad facilities. In order for the Pennsylvania Turnpike Commission to proceed toward construction, we need the involvement of the owners of these railroad facilities now during the Environmental Impact Statement and Preliminary Design phase of our project. Usually, final approvals by railroad companies come at the final design stage of a highway project, when very specific engineering details are available. In this particular situation, the railroad relocations are so substantial that some of the highway alternatives may not be feasible without a total commitment of cooperation by the owners of the railroad facilities.

Cooperation, as well as timely coordination, to accommodate rail and highway needs in this severely restricted, narrow corridor is paramount to the achievement of our goals. Without appropriate review and approvals from the railroads during this Environmental Impact Statement phase, the alternative selected may be invalidated, which would cause a significant delay in project development and substantially increase the cost of the proposed transportation improvements.

Our project will have direct effects on Conrail, CSX and Union Railroad tracks and related facilities. Our initial estimate indicates that approximately 10 miles of railroad tracks belonging to Conrail, CSX and Union railroads would have to be relocated. In addition, numerous grade-separated crossings over existing tracks and yards will need to be constructed. This construction can be potentially disruptive to railroad operations if not thoroughly coordinated. These railroad relocations may also affect other facilities located in the railroad right-of-way. I have provided copies of maps that show the general locations where these relocations would be required.

Because of the number of parties involved and the complexity of the issues to be resolved, it is imperative that the Pennsylvania Turnpike Commission get early and full cooperation from the affected railroad companies - especially Conrail, Norfolk Southern and CSX - so that a mutually satisfactory resolution - on a timely basis - can be achieved for both the highway and railroad facilities.

Immediate cooperation is needed so that the Commission can proceed in a timely manner to complete the Environmental Impact Statement and obtain a Record of Decision for this major project. By working through these issues at this time, we can develop an alignment that will mutually accommodate and benefit both transportation modes - highway and rail - and serve the residents and businesses of the Commonwealth of Pennsylvania and our interstate clients.

We have begun the necessary coordination with Conrail, CSX and Union Railroad. We have provided preliminary plans of our project to the Engineering Department of each Railroad. We are concerned that the pending acquisition will limit Conrail's ability and willingness to work with us.

Summary

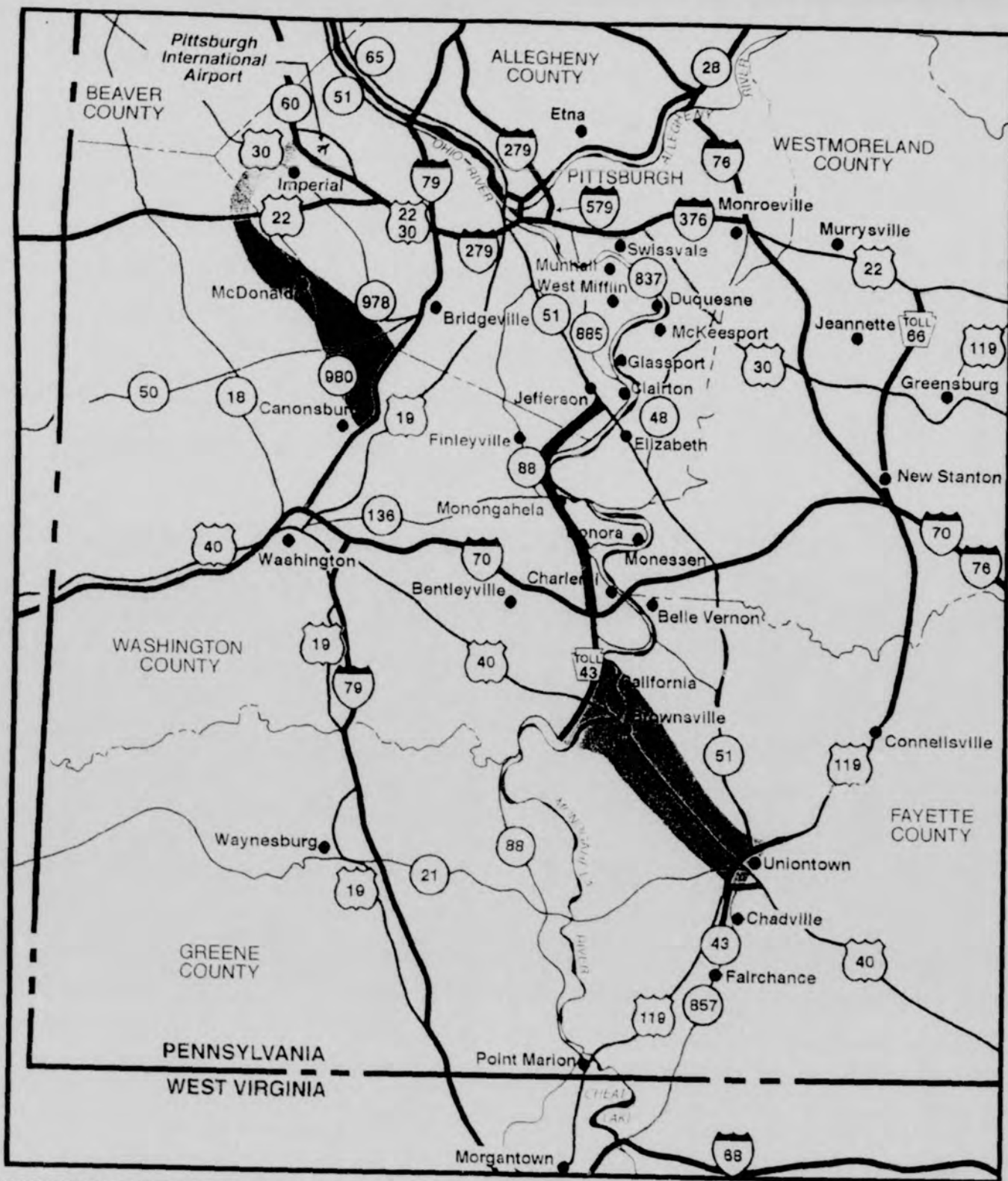
Allow me then to summarize the needs of the Pennsylvania Turnpike Commission related to the effect of the acquisition of Conrail on our plans for the Mon/Fayette Expressway Project from PA 51 in Jefferson Borough to I-376 in Pittsburgh and Monroeville.

1. We need a commitment from Conrail, CSX and Norfolk Southern to coordinate, cooperate and accommodate our highway. Unless we have such a commitment, our plans for a multi-billion dollar investment in the Mon Valley will be significantly delayed.
2. We need to expedite coordination with the current and future owners of the railroad facilities. This coordination must take place prior to completion of our Draft Environmental Impact Statement so that we can be assured of the feasibility of our alternatives.
3. We must be assured that any agreements we make now with Conrail regarding relocation or reconstruction of their facilities will be honored by the eventual owners of these facilities (CSX and Norfolk Southern).
4. We need the timely review and approval of our proposed plans by all appropriate railroad officials, before the sale of Conrail is complete, to avoid delays and attendant increased costs.

5. We would appreciate the support of this Committee before the Surface Transportation Board (formerly the Interstate Commerce Commission) to achieve the four needs I have just enumerated, and to incorporate appropriate conditions in any Surface Transportation Board Order approving the acquisition of Conrail.

Thank you Chairman Geist, for providing the opportunity to testify on behalf of the Pennsylvania Turnpike Commission for this very important project that is extremely important to the future of the City of Pittsburgh and Southwestern Pennsylvania.

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MON/FAYETTE EXPRESSWAY AND SOUTHERN BELTWAY PROJECTS



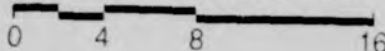
Pennsylvania Turnpike Commission

Commonwealth of Pennsylvania
PO Box 67676
Harrisburg PA 17106-7676

Prepared By: McCormick, Taylor & Associates, Inc.
REVISED: 2-24-97



Scale: 1" = approx 8 miles



MON/FAYETTE

I-68 to Route 43 (ROD 9/94)

Uniontown to Brownsville

I-70 to PA-51 (ROD 5/94)

PA-51 to Pittsburgh

SOUTHERN BELTWAY

PA-60 to US 22

US 22 to I-79

I-79 to Mon/Fayette

CONTINUED ON SHEET 1

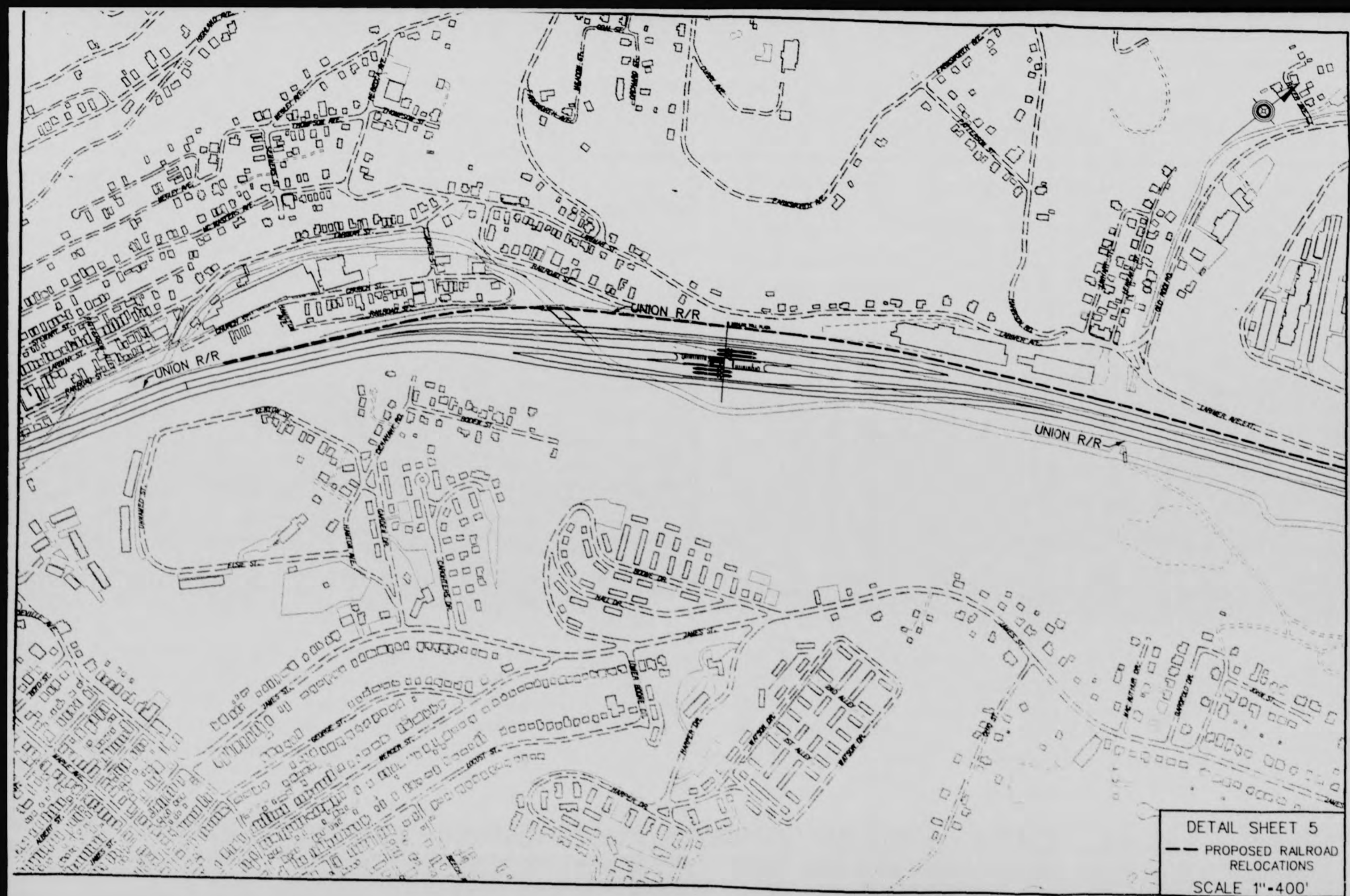


DETAIL SHEET 2

— — PROPOSED RAILROAD
RELOCATIONS

SCALE 1"-400'







DETAIL SHEET 6
--- PROPOSED RAILROAD
RELOCATIONS
SCALE 1"=400'

STB

FD-33388

2-2-98

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CHARTER TOWNSHIP OF HIGHLAND

205 North John Street • P.O. Box 249 • Highland, Michigan 48357-0249 • (248) 887-3791

ENVIRONMENTAL DOCUMENT

January 28, 1998

Ms. Elaine K. Kaiser
1925 K Street, N.W.
Washington D.C. 20423-0001



Dear Ms. Kaiser:

I have been informed that Highland Township will be affected by a recent joint acquisition of Conrail Incorporated by CSX Corporation and Norfolk Southern Railway. It is my understanding the merger will result in a 20% increase in tonnage shipped per day requiring longer trains and an average of 1.2 additional trains daily.

These increases are a source of concern and I think it's reasonable to expect assurances that all safety issues associated with this increased rail traffic will be addressed by CSX prior to its implementation. A letter to that effect would be appreciated. I look forward to hearing from you.

Sincerely,

John P. Stakoe
Highland Township Supervisor

STB

FD-33388

2-2-98

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ID-CITIES

OKI Ohio • Kentucky • Indiana
Regional Council of Governments

Larry Crisenbery, President
James Q. Duane, Executive Director

January 29, 1998

Office of the Secretary - Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K Street NW
Washington, D.C. 20423-0001

**ENVIRONMENTAL
DOCUMENT**



ATTENTION: ELAINE K. KAISER

Dear Secretary:

We have reviewed the Draft Environmental Impact Statement "Supplemental Errata" and offer comments on Table 5-OH-11 (dated 1/20/89).

For Hamilton County, Ohio, the grade crossings listed at Winton Road (Segment No. C-063) and Mitchell Avenue (Segment No. C-063) do not exist anymore. The track which crossed these roads was used as an industrial spur track until a few years ago before it was abandoned and the track taken up. The mainline CSX tracks which run parallel to this line (see map) are the line which you referring to. This line, however, does not cross Winton Road or Mitchell Avenue. On the map, the mainline CSX line is shown in pink and the abandoned CSX industrial spur is shown in yellow.

We have enclosed the original plus ten copies as you requested. If you have any questions regarding the above information, please call me at (513) 621-6300.

Sincerely,

Reginald G. Victor
Transportation Engineer

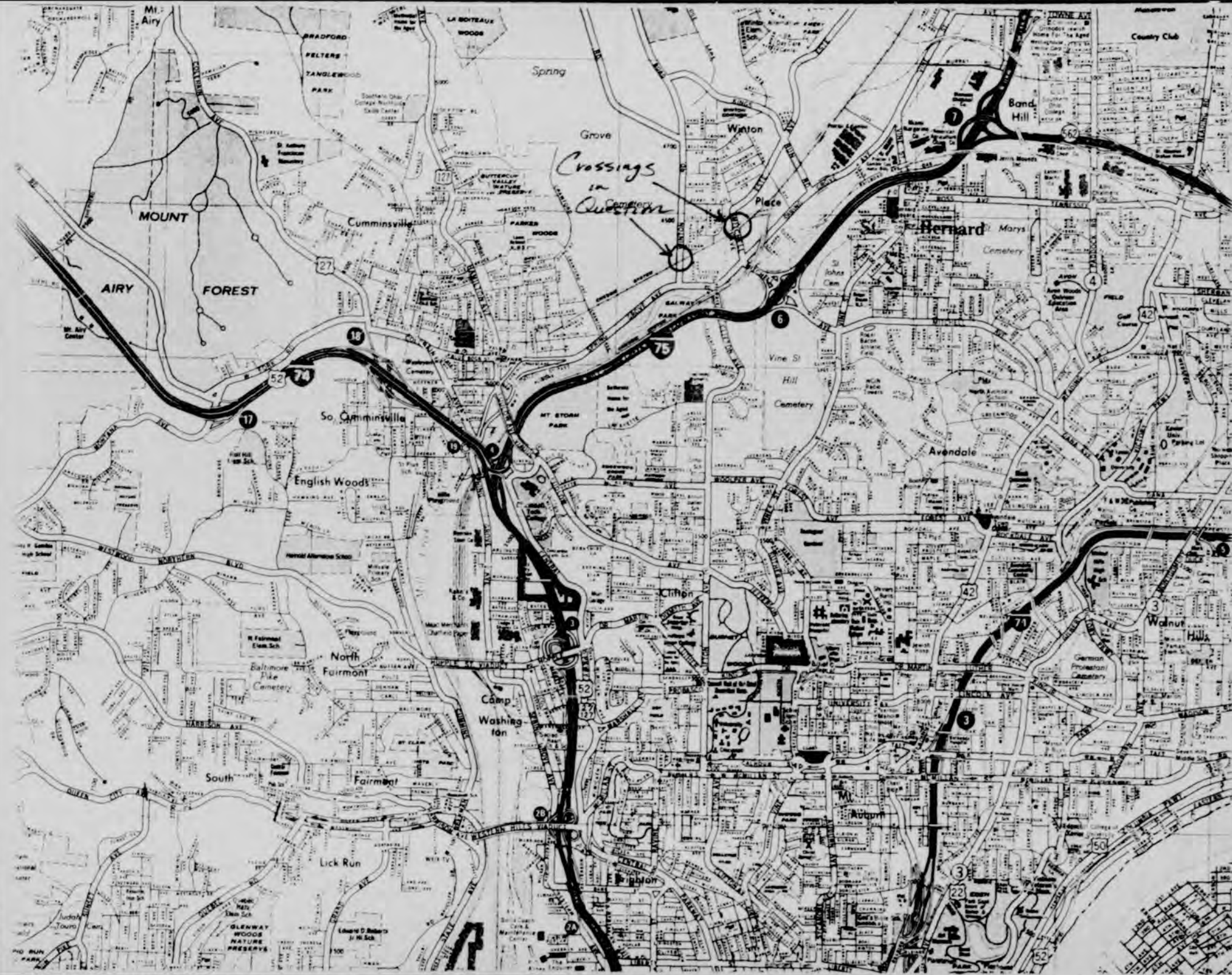
Enclosures

Serving the Counties of

Boone • Butler • Campbell • Clermont • Dearborn • Hamilton • Kenton • Warren

801-B West Eighth Street - Suite 400, Cincinnati, Ohio 45203-1607 Phone: (513) 621-6300 Fax: (513) 621-9325

Web Site: <http://www.oki.org>



PROPOSED CONRAIL ACQUISITION
FINANCE DOCKET NO. 33388
DRAFT ENVIRONMENTAL IMPACT STATEMENT SUPPLEMENTAL ERRATA

Table 5-OH-11 (Revised)
Ohio
Highway/Rail At-Grade Crossing Vehicle Delay and Queues

County	Seg. No.	Crossing FRA ID	Roadway Name	Number of Roadway Lanes	ADT	Pre Acquisition							Post Acquisition							Level of Service	Level of Service with Mitigation	
						Trains per day	Train Speed (mph)	Train Length (feet)	No. of Veh. Delayed per day	Max. No. of Veh. in Queue per lane	Crossing Delay per stopped veh. (min./veh.)	Avg. Delay per Vehicle (All vehicles) (sec./veh.)	Level of Service	Trains per day	Train Speed (mph)	Train Length (feet)	No. of Veh. Delayed per day	Max. No. of Veh. in Queue per lane	Crossing Delay per stopped veh. (min./veh.)			Avg. Delay per Vehicle (All vehicles) (sec./veh.)
Franklin	N-073	481472X	LINCOLN	2	9,810	26.0	40	4,869	334	18	1.33	5.43	B	34.3	40	5,000	449	19	1.36	7.44	B	
Franklin	N-073	481467H	WEBER	2	8,678	26.0	40	4,869	295	16	1.27	5.18	B	34.3	35	5,000	439	18	1.43	8.69	B	
Franklin	N-073	481470J	COOK	2	11,424	26.0	40	4,869	388	22	1.43	5.82	B	34.3	40	5,000	523	22	1.45	7.99	B	
Hamilton	C-063	152346W	WINTON RD	4	21,820	28.2	20	6,000	1670	43	2.89	26.59	D	31.2	20	6,200	1902	44	2.98	31.15	D	
Hamilton	C-063	152347D	MITCHELL AVE	2	14,930	28.2	20	6,000	1143	58	3.52	32.31	D	31.2	20	6,200	1301	60	3.62	37.86	D	
Hamilton	C-063	152355V	TOWNSHIP AVE	2	9,270	28.2	20	6,000	710	36	2.70	24.80	C	31.2	20	6,200	808	37	2.78	29.05	D	D (b)
Hamilton	C-063	152356C	SEYMOUR	2	6,560	28.2	35	6,000	314	16	1.52	8.75	B	31.2	35	6,200	357	16	1.56	10.20	B	
Hamilton	C-063	152357J	NORTHBEND	2	6,360	28.2	35	6,000	305	16	1.51	8.69	B	31.2	35	6,200	346	16	1.55	10.13	B	
Hamilton	C-063	152368W	WYOMING AVE	2	7,230	28.2	35	6,000	346	18	1.56	8.97	B	31.2	35	6,200	393	18	1.60	10.45	B	
Hamilton	C-063	152370X	MARIOS RD	2	6,260	28.2	35	6,000	300	15	1.50	8.65	B	31.2	35	6,200	341	16	1.54	10.09	B	
Hamilton	C-063	152376S	SHARON RD	3	14,040	28.2	35	6,000	673	23	1.70	9.76	B	31.2	35	6,200	764	24	1.74	11.38	B	
Hamilton	C-063	152380D	PRINCETON PIKE	4	25,630	28.2	35	6,000	1,229	31	1.98	11.38	B	31.2	35	6,200	1396	32	2.03	15.27	B	
Hamilton	C-063	152381K	CRESENTVILLE RD	4	8,740	28.2	35	6,000	419	11	1.41	8.09	B	31.2	35	6,200	476	11	1.44	9.44	B	
Hamilton	N-076	524743Y	VINE ST	4	8,560	33.9	35	5,600	467	10	1.33	8.70	B	38.6	35	5,600	487	9	1.22	8.71	B	
Hamilton	N-076	524746L	REICH ST	2	11,660	33.9	35	5,600	604	26	1.73	11.32	B	38.6	35	5,600	630	27	1.58	10.81	B	
Hamilton	N-078	524719X	SMALLEY RD	2	9,680	11.7	35	5,600	182	22	1.63	7.68	A	18.9	35	5,000	270	21	1.49	4.90	A	
Hamilton	N-078	524767D	HAI CK RD	2	6,200	11.7	35	5,600	117	14	1.42	3.21	A	18.9	35	5,000	173	13	1.30	4.35	A	
Hamilton	N-078	524712A	KEMPER RD	2	5,980	11.7	35	5,600	113	14	1.43	3.19	A	18.9	35	5,000	167	13	1.29	4.32	A	
Hamilton	N-078	524713G	READING RD	4	11,820	11.7	35	5,600	223	14	1.41	3.18	A	18.9	35	5,000	329	13	1.29	4.31	A	
Hamilton	N-078	524740D	TOWNSHIP AVE	2	7,520	11.7	35	5,600	142	17	1.49	3.38	A	18.9	35	5,000	210	16	1.37	4.57	A	
Hamilton	N-078	524722F	WYOMING ST	2	9,270	11.7	35	5,600	175	21	1.60	3.62	A	18.9	35	5,000	258	20	1.47	4.90	A	
Hamilton	N-078	524742S	MURRAY ST	3	5,830	11.7	35	5,600	110	9	1.31	2.96	A	18.9	35	5,000	162	8	1.20	4.02	A	
Hamilton	C-062	532679X	MAIN ST	2	6,310	5.9	40	5,600	54	13	1.29	1.32	A	17.9	40	6,200	138	14	1.39	3.65	A	
Hamilton	C-067	51848H	MAIN ST	2	5,100	14.5	50	5,600	91	9	1.04	2.24	A	31.3	48	6,200	229	11	1.22	6.56	B	
Lake	C-060	523829E	LAKE ST SR 528	2	8,810	48.3	50	5,600	524	16	1.20	8.57	B	54.2	50	6,200	673	17	1.29	11.16	B	
Lake	C-060	523803K	HOPKINS RD	2	8,850	48.3	50	5,600	526	16	1.20	8.50	B	54.2	50	6,200	676	17	1.30	11.17	B	
Lake	C-060	523800G	PITTON RD	2	5,650	48.3	50	5,600	536	10	1.07	7.60	B	54.2	50	6,200	496	11	1.15	9.89	B	
Lake	C-060	523793Y	FRIS ST	2	8,700	48.3	50	5,600	494	15	1.18	8.40	B	54.2	50	6,200	596	16	1.27	10.93	B	
Lake	C-060	523791K	BEIDLER RD-1561ST	2	5,450	48.3	50	5,600	324	10	1.06	7.55	B	54.2	50	6,200	392	10	1.14	9.82	B	
Lake	C-060	523789J	1561ST	2	11,170	48.3	50	5,600	664	20	1.33	9.47	B	54.2	50	6,200	803	21	1.43	12.33	B	
Lake	C-060	523787Y	LLOYD RD	2	7,400	48.3	50	5,600	440	13	1.14	8.14	B	54.2	50	6,200	532	14	1.22	10.56	B	
Lake	N-075	472017E	LAKE ST	2	8,810	13.0	50	4,869	128	14	1.09	1.89	A	36.6	50	5,000	366	14	1.11	5.53	B	
Lake	N-075	472039J	LIBERTY ST	2	7,580	13.0	50	4,869	142	16	1.34	3.03	A	36.6	50	5,000	409	16	1.37	8.88	B	
Lake	N-075	472040Y	CHESNUT ST	2	4,980	13.0	50	4,869	112	12	1.27	2.84	A	36.6	50	5,000	323	13	1.29	8.36	B	
Lake	N-075	472044C	MELBOR AVE	4	19,260	13.0	50	4,869	279	15	1.13	1.96	A	36.6	50	5,000	801	16	1.15	5.75	B	
Lake	N-075	472045J	JACKSON ST	3	5,230	13.0	50	4,869	76	8	0.95	1.66	A	36.6	50	5,000	218	9	0.97	4.84	A	
Lake	N-075	472046R	HEINLEY RD	2	6,760	13.0	50	4,869	92	10	0.99	1.72	A	36.6	50	5,000	265	10	1.01	5.04	B	
Lake	N-075	472048E	HOPKINS RD	2	5,460	13.0	50	4,869	79	9	0.96	1.67	A	36.6	50	5,000	225	9	0.98	4.88	A	
Lake	N-075	472056W	FRIS ST	2	8,570	13.0	50	4,869	124	14	1.08	1.88	A	36.6	50	5,000	350	14	1.10	5.48	B	
Lake	N-075	472064N	RUSS RD	4	6,164	13.0	50	4,869	80	5	0.88	1.54	A	36.6	50	5,000	250	5	0.90	4.50	A	
Lake	N-075	472068R	LLOYD RD	2	7,400	13.0	50	4,869	139	15	1.33	3.01	A	36.6	50	5,000	399	16	1.36	8.82	B	

STB FD-33388 2-2-98 ✓ K ID-CITIES.

**A RESOLUTION OF THE
WARREN COUNTY BOARD OF SUPERVISORS
RE: FINANCE DOCKET NO. 33388 – PROPOSED ACQUISITION OF CONRAIL BY
NORFOLK SOUTHERN RAILROAD AND CSX RAILROAD: DRAFT
ENVIRONMENTAL IMPACT STATEMENT**



Whereas, Warren County, Virginia is currently served by the Norfolk-Southern Railway, and

Whereas, in the last decade, this community has experienced a significant increase in rail traffic as a result of express freight traffic on the line from Riverton Junction to Manassas; and

Whereas, the citizens of Warren County have experienced impacts due to noise, air quality and significant traffic conflicts at grade crossings during this period; and

Whereas, industrial development in the county, including the Virginia Inland Port, has occurred because of the availability of local rail service, but has not been the main cause of traffic increases; and

Whereas, the Environmental Report received July, 1997 projected changes in the three major rail segments centered on Riverton Junction in Front Royal – north toward Harrisburg a 77% increase from 11.1 to 19 trains per day; south to Roanoke, a 210% increase from 3.9 to 12.3 trains per day; and east to Manassas, a 22% reduction from 11.3 to 8.8 trains per day, and

Whereas, the Draft Environmental Impact Statement dated December 12, 1997 concludes there is only minimal impact for air quality, noise, grade crossing conflicts and accidents for Warren County, despite the fact that air quality and noise impacts exceeded the Surface Transportation Board's thresholds; and

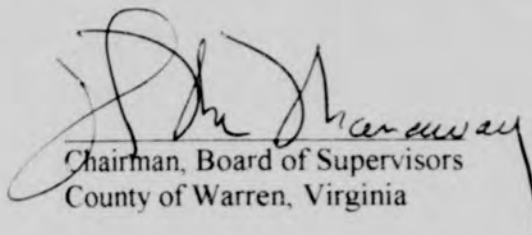
Whereas, the train traffic projections are highly speculative given the strategic location of Riverton Junction for east coast and Midwestern rail traffic and high probability of increased freight through traffic, and


Whereas, the citizens of Warren County are already coping with the current increases in through traffic as previously noted,

NOW, THEREFORE, BE IT RESOLVED the Warren County Board of Supervisors petitions the Surface Transportation Board to consider the high probability of more significant environmental impacts on this community due to the proposed acquisition; and

BE IT FINALLY RESOLVED that the Final Environmental Impact Statement include a requirement for a five year review period from the effective date of the final decision for the assessment of environmental impacts and remediation options.

Adopted: January 20, 1998


Chairman, Board of Supervisors
County of Warren, Virginia


Clerk, Board of Supervisors
County of Warren, Virginia

**ENVIRONMENTAL
DOCUMENT**

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DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
P. O. BOX 4970
JACKSONVILLE, FLORIDA 32232-0019



REPLY TO
ATTENTION OF

Regulatory Division

Office of the Secretary
Attention: Ms. Elaine K. Kaiser
Case Control Unit
Finance Docket No. 33388
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

ENVIRONMENTAL
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Dear Ms. Kaiser:

Thank you for mailing to us a copy of the Draft Environmental Impact Statement (DEIS) for the proposed acquisition of Conrail, Inc., by Norfolk Southern Railroad and CSX Railroad.

We note that the description of the analysis methods used in the preparation of the DEIS, at paragraph 3.15.3, specifically included consideration of U.S. Army Corps of Engineers permitting requirements under Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act. This office, the Regulatory Division of the Jacksonville District of the U.S. Army Corps of Engineers, administers the permitting program for activities occurring in Florida.

The Executive Summary, at page ES-24, and the specific discussion for Florida, at page FL-2, reports no construction activity in Florida. Therefore, an application for a permit is not required to be submitted to this office. However, if there are any changes that result in work in Florida, please advise this office at the address above. We will assist in determining whether the construction is in the location and of the nature that requires a permit.

Feel free to contact Bob Barron at the letterhead address or by telephone at (904) 232-2203.

Sincerely,

Hanley K. Smith
Acting Chief, Regulatory Division

Attention: Elaine K. Kaiser
Environmental Project Director
Environmental Filing

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CITY OF MONROE

ENVIRONMENTAL DOCUMENT

Office of City Manager

January 30, 1998

**Ms. Elaine K. Kaiser
Environmental Project Director
Section of Environmental Analysis
Surface Transportation Board
1925 K Street NW
Washington, DC 20423-0001**



**RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT
ON THE PROPOSED ACQUISITION OF CONRAIL
BY NORFOLK SOUTHERN RAILROAD AND
CSX RAILROAD**

Dear Ms. Kaiser:

The City of Monroe wishes to express two concerns requiring the environmental impact of the acquisition of Conrail by Norfolk Southern Railroad and the CSX Railroad.

Due to the City of Monroe's proximity to Detroit much of the freight traffic generated by the greater Detroit Area travels through the City of Monroe bound for the rest of the county. The rail portion of this freight utilizes five main line tracks, two Conrail tracks, two CSX tracks and a Canadian National (Grand Trunk Western) track. The southbound Conrail track traverses a residential area in the east-central part of Monroe, and closely abuts a City street, Kentucky Avenue. In this area, some of the rail track lies less than thirty feet (30') from residences. The track prevents vehicle access to homes by eliminating the possibility of driveways and parking, and lies within a few feet of pedestrian sidewalks with no barrier protection. Besides the potential safety concerns, noise and vibration generated by daily rail operations (thru and yard movements) negatively impact local residents and a nearby school and playground. Residential property values in this area are adversely affected and all manner of daily living activities are worsened by the close proximity of this rail line.

The Norfolk Southern Railroad has expressed strong support for the Monroe Area Rail Consolidation project which would lead to the elimination of the southbound Conrail line. We believe that their strong commitment to safety will lead to the eventual abandonment of this track either by the full implementation of the Monroe Area Rail Consolidation or by their use of northbound Conrail as a bi-directional line through the Monroe area.

Ms. Elaine K. Kaiser
Environmental Project Director
Page Two
January 30, 1998

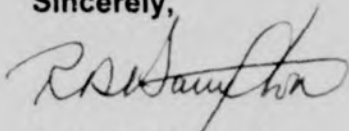
The City of Monroe requests that the Surface Transportation Board support the need to eliminate the southbound Conrail track thru the Monroe Area and encourage the Federal Highway Administration to fully fund the Monroe Area Rail Consolidation plan as approved June 2, 1997 by the FHWA.

The second concern involves the reports indication of increased train movements, including hazardous materials, on the existing CSX tracks in the western part of the City of Monroe. Table 5-MI-5 of the Draft Environmental Impact Statement indicates an increase in trains per day of 11.2 on this line and Table 5-MI-9 indicates an increase in annual hazardous material car loads from 14,000/year to 31,000/year as a result of the acquisition of certain Conrail lines by CSX.

The existing high level of train movements on the CSX track already causes the residents and motoring public much aggravation. The residential properties abutting these tracks will be negatively impacted by the increased traffic and the property owners have a right to be concerned by the significant increase in hazardous cargo being transported. The City Council was concerned enough by the blockages caused by the existing train movements along CSX tracks to commission a feasibility study for a grade separation on a selected street (see attached report). With an anticipated increase of train movements of approximately fifty percent (50%), the problem will be even more acute.

The City of Monroe requests that every effort to divert unnecessary "hazardous material" freight around the Monroe Urban Area be made and adequate measures to safeguard the public be taken. We also ask the CSX Railroad be directed to grade separate Elm Avenue in the City of Monroe.

Sincerely,



Robert A. Hamilton
City Manager

CC: C.D. Cappuccilli, Mayor
D. Link, City Engineer

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MONROE COUNTY
EMERGENCY MANAGEMENT
DIVISION

MITCHELL V. YUDASZ, JR., DIRECTOR
MICHAEL M. KATALINICH, ASSISTANT DIRECTOR
GLENDA S. WHITE, EMERGENCY RESPONSE PLANNER

JAN 30 1998

January 30, 1998

ENVIRONMENTAL
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Mr. Royce Maniko, Director
Monroe County Planning Department
125 E. Second St.
Monroe, MI 48161

Dear Mr. Maniko:

I would like to offer some feedback from the members of this department in reference to the proposed acquisition of Conrail by CSX Transportation and Norfolk Southern Railroad. Pursuant to recent public information, we have some concerns reference the environmental impact and emergency preparedness issues:

1. Current transportation loads are approximately 14,000 cars annually. With the proposed acquisition, the load will increase to approximately 31,000 annually. As many of these rail cars transport hazardous materials, this will increase the potential for an accident involving these materials and ultimately, the safety of the public.
2. With the increased potential for accident, emergency management will have to provide planning, training and exercising to respond to these types of occurrences. In addressing this emergency response plan, the following is necessary:
 - a. Training for emergency responders (police, fire, emergency management, etc.
 - b. Specialized equipment for this type of response.
 - c. Exercise evaluators
 - d. Specialized emergency planning support, with expertise/guidance, if needed.
 - e. Assistance and support with public information and education.
 - f. Additional public warning capabilities (sirens, alert monitors, etc.)
 - g. Support for exercises and drills that must take place. Because Monroe County is mandated by the federal government to participate in a very costly series of full-scale exercises on a biannual basis (large expense in personnel, resources and supplies). Additional full-scale exercises would be extremely difficult to accomplish without support.

In reading the section of Environmental Analysis (SEA), we notice that railroads are encouraged to develop a hazardous materials response plan and exercise this plan biannually with local governments. In respect to the statement *volunteer*, what level of commitment will be made by CSX to communities affected by the increased hazard.

Thank you for considering our concerns

Very truly yours,

Mitchell Yudas, Jr., P.E.M.
Emergency Management Director

MVY/pal



MONROE COUNTY
PLANNING DEPARTMENT & COMMISSION

125 EAST SECOND STREET • MONROE, MICHIGAN 48161-2197
TELEPHONE: (734) 243-7093 • FAX: (734) 243-7572

ROYCE R. MANIKO, AICP
DIRECTOR

**ENVIRONMENTAL
DOCUMENT**



January 30, 1998

Office of the Secretary
Case Control Unit
Finance Docket No.33388
Surface Transportation Board
1925 K Street NW, Room 500
Washington DC 20423-0001

Attn: Elaine K. Kaiser
Chief, Section of Environmental Analysis
Environmental Filing

We would like to list issues of concern pertaining to the Environmental Impacts of the proposed acquisition of Conrail by CSX Transportation and Norfolk Southern Railroad. These concerns were expressed at a public information meeting held at Monroe County Community College on January 21, 1998.

1. **Hazardous Materials:**

- a) An increase is expected in traffic from 14,000 carloads annually to 31,000 carloads annually on CSX line between Carleton, MI and Toledo, OH. This will result in increased loads of hazardous materials traveling through the County, along with the potential for accidents resulting from these materials, thus endangering public safety.
- b) With increased potential for an accident, the Monroe County Emergency Management Division will have to provide planning, training, and exercises to respond to these types of occurrences. In addressing this emergency response plan, the following is necessary:
 - i) Training for emergency responders (police, fire, Emergency Management, etc.)
 - ii) Specialized equipment for this type of response
 - iii) Exercise evaluators

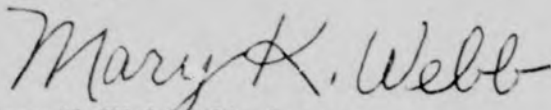
- iv) Specialized emergency planning support, with expertise/guidance, if needed
 - v) Assistance and support with public information and education
 - vi) Additional public warning capabilities (sirens, alert monitors, etc.
 - vii) Support for exercises and drills that must take place. Monroe County is presently mandated by the federal government to participate in a very costly series of full-scale exercises for the Enrico Fermi II Nuclear Power Plant, on a biannual basis (large expense in personnel, resources and supplies). At this time, our estimated start-up costs would be between \$12,000 and \$15,000, and ongoing expenses would be \$8,000 annually.
- c) According to the Section on Environmental Analysis (SEA), railroads are encouraged to develop a hazardous materials response plan and carry out biannual exercises according to this plan, in cooperation with local governments. What level of commitment will be made by CSX to communities affected by the increased hazard? Monroe County would request reimbursement for initial and ongoing costs for emergency preparations. We would be willing to work with CSX to negotiate a plan for this.
2. **Impact on Nuclear Plant Emergency Evacuation:** Increased rail traffic on NS and CSX, and faulty crossing warning systems could cause delays in evacuating the area around the Enrico Fermi II Nuclear Power plant in the event of an emergency. We do not find statements in the EIS regarding impacts on evacuation routes.
3. **Nuclear Waste:** The federal government will be assuming responsibility for all high-level radioactive wastes in the United States. They will be providing a central storage/disposal repository for these materials. As many of these materials will be transported by both truck and rail, what is the increased likelihood of an accident involving these items?
4. **Monroe Rail Consolidation Project:** Railroad support of Monroe's ongoing project to consolidate east side rail lines (Conrail/NS and CNNA) is essential to its success. This project has been in the planning stages for more than fourteen years, and preliminary engineering studies are being completed. Partial funding from the federal government has been secured, and phase one of the project, an underpass at the Conrail/North Dixie Highway grade

crossing is scheduled to get underway this spring. As additional funding is secured, ongoing phases will include the relocation of Conrail Warner Yard in Monroe, the needed crossovers to consolidate the Conrail lines with Grand Trunk CNNA lines through the City of Monroe, and Frenchtown and Monroe Townships, and construct the needed crossovers in order to abandon the redundant Conrail lines. Many years of planning for the project are just now beginning to result in implementation. Continued support from Conrail's successor is necessary for this project to be successful.

5. **Traffic Safety:** Significant increase in traffic on CSX line between Carleton, MI and Toledo, OH, and minor increase in traffic on Conrail (NS) line between Detroit and Toledo would mean more blocked grade crossings, causing delay of emergency vehicles, more potential train/car accidents, and general inconvenience to motorists. The Monroe County Road Commission needs railroad contact numbers to report problems on grade crossings. Problems observed at crossings along Telegraph Road and elsewhere need to be addressed.
6. **Economic Development Opportunities:** Cooperation of the railroads is essential to our local economic development efforts.
7. **Noise Mitigation:** With 11.2 more trains per day projected on the CSX line, railroads must continue efforts to mitigate noise impacts on local communities, especially residential areas. While this issue was addressed with regard to the line from Ecorse to Carleton, we feel it needs to be evaluated along the line running from Carleton to Toledo as well, including the City of Monroe.

We would like to thank SEMCOG for their assistance during the Environmental Review period.

Sincerely,



Mary K. Webb, Chairman
Monroe County Planning Commission

cc: Honorable Carl Levin, United States Senator
Honorable Senator Spencer Abraham, United States Senator
Honorable John D. Dingell, 16th District U. S. Congressman

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The Town of
HAYMARKET
-Established in 1799-

County of Prince William

ENVIRONMENTAL
DOCUMENT

November 21, 1997



Ms. Elaine K. Kaiser
Surface Transportation Board
1925 K Street, NW, Room 504
Washington, DC 20423-0001

Re: Finance Docket No. 33388
CSX/Norfolk Southern/Conrail

Dear Ms. Kaiser:

I write as the Mayor of the Incorporated Town of Haymarket, Virginia, approximately 40 miles west of Washington, DC. Our small historic town is transected by the "B Line" of the Norfolk Southern railroad that transports freight to and from the Hampton Roads port and points west.

We are extremely concerned about the safety of our area residents and the future impact of Norfolk Southern's use of the B Line. This freight rail line travels through a densely populated residential neighborhood in Haymarket, along a feeder stream for a major public water source, past a pre-Civil War church and across U.S. Route 29, one of the most heavily traveled highways along the East Coast and already the most dangerous rail/public highway crossing in Virginia.

In the last year alone there have been two major rail accidents and one death in our immediate area. On May 2, 1997, a freight train derailed at Route 29, narrowly missing an occupied day care center, a propane storage yard and a gas station. On July 11, 1997, a train struck a tractor trailer near the same crossing. Sadly, on November 21, 1996, a local resident was killed when her car was struck by a train at an unguarded crossing.

The potentials for environmental and public safety disasters are great along the B Line. Nearly two years ago Norfolk Southern announced it intended to greatly increase freight traffic along this line, which provoked substantial public outcry and expressions of concern by local fire and rescue agencies. However Norfolk Southern's organization plan filed before your agency in connection with the Conrail acquisition shows freight traffic not increasing, but in fact, slightly decreasing.

On behalf of the Town, I strongly appeal for your assistance in ensuring Norfolk Southern is held to its plan for not increasing freight traffic on the B Line after its acquisition of Conrail lines. We believe this commitment must be reflected as part of its safety integration plan -- ordered by your agency on November 3 -- exactly because this is a significant safety issue for our community.

Ms. Elaine K. Kaiser

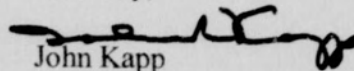
November 21, 1997

Page 2

Further, we request that the Surface Transportation Board retain jurisdiction over Norfolk Southern's future use of the B Line after its decision on the acquisition to assure the health and well-being of our local residents.

Thank you for your kind consideration.

Sincerely,



John Kapp
Mayor

cc: Ms. Jolene M. Molitoris
Administrator, Federal Railroad Administration
400 7th Street, SW ROA-1
Washington, DC 20590

Steven Kalish, Esq.
McCarthy Sweeney Harkaway
1750 Pennsylvania Ave. NW
Washington, DC 20006

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ENVIRONMENTAL DOCUMENT

Suite 560, National Place
1331 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 783-8124

November 24, 1997



Elaine K. Kaiser, Chief
Section of Environmental Analysis
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

Re: Finance Docket No. 33388/CSX
Post-Transaction Hazardous Materials Volumes

Dear Ms. Kaiser:

Pursuant to a request from the Section of Environmental Analysis ("SEA"), CSX provided SEA with information relating to the volumes and routing of hazardous materials on the pre-transaction CSX and Conrail systems. CSX also attempted to isolate the volumes and routings of hazardous materials on the post-transaction expanded CSX system within the traffic studies conducted for the Application, and provided SEA with these results.

When one compares the base and the estimated post-transaction volumes of hazardous materials provided by CSX, one finds some significant increases on certain line segments. This increase was surprising to CSX as CSX does not anticipate diverting significant volumes of hazardous materials from truck to rail, and does not anticipate major rerouting of existing traffic over the line segments where the greatest increases appear. Consequently, CSX undertook further analysis of the data.

Our reanalysis of the hazardous materials movements expected to be transported on the expanded CSX system after the transaction has revealed that the post-transaction numbers we provided to the SEA are overstated. Although our reanalysis is not yet complete, the overstatement appears to be in the range of 20 percent, or even greater. This overstatement appears to have resulted primarily from the fact that all movements of certain categories of commodities were presumed to be hazardous, even though only a small percentage of the movements were actually hazardous.

Elaine K. Kaiser, Chief
November 24, 1997
Page 2

For example, all movements of motor vehicle body parts (STCC Code 37-14790) were counted as hazardous in the post-transaction traffic volumes, even though only a very small percentage of such parts are actually hazardous.

This overstatement occurred because the traffic files used for the traffic studies that estimated the post-transaction movements underlying the Operating Plan characterized movements according to their STCC commodity code, and not by their STCC transportation hazard code (STCC codes 48 and 49). This is the first time that SEA has required applicants to conduct a detailed analysis of post-transaction movements of hazardous materials, and the traffic studies that support the Application and the CSX Operating Plan were not designed with all of the information required for this purpose.

CSX is reviewing its hazardous materials analysis using a more refined method for translating STCC commodity codes into STCC transportation hazard codes. We anticipate that another two to three weeks is required to reanalyze the data and translate the information into traffic volumes by line segments. We regret that this overstatement occurred and will submit the revised information to SEA as soon as it is completed.

Sincerely,

Peter J. Shudtz MKH
Peter J. Shudtz

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

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Section of Environmental Analysis

October 31, 1997

Honorable Michael R. White
City of Cleveland
City Hall
601 Lakeside Avenue, NE
Cleveland, Ohio 44114

Re: Finance Docket No. 33388 -- CSX and Norfolk Southern -- Control and
Acquisition -- Conrail

Dear Mayor White:

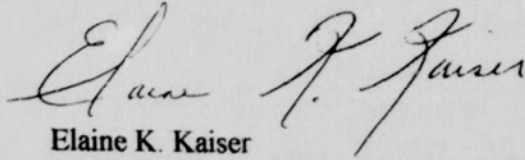
I would like to take this opportunity to acknowledge the concerns you raised in your comments regarding the proposed Conrail acquisition. Also, I would like to thank you for making your staff available to meet with members of our Cleveland Team on Thursday, October 30, 1997. I understand that your staff was very knowledgeable, committed, and helpful. I am interested in working with you and your staff in the coming months in order to fully understand the potential environmental impacts that the project could have on your City. We also welcome any specific environmental mitigation you might suggest.

As you know, the Surface Transportation Board (Board), as the Federal entity that approves, disapproves, or approves with conditions railroad mergers, is conducting an independent review of this proceeding. The Board's Section of Environmental Analysis (SEA) is charged with preparing an Environmental Impact Statement (EIS) to evaluate potential environmental effects of the proposed transaction. The City of Cleveland has been a major focus of our review. Our independent third-party contractors have visited Cleveland numerous times and have established a special Cleveland Team for the region. Our goal is to assess the potential environmental impacts that the project might have on Cleveland and identify possible mitigation measures.

SEA will release a Draft EIS this winter for public review and comment. After SEA assesses the public comments and conducts further environmental analyses, we will issue a Final EIS. For your reference, I have included a Fact Sheet on the proposed transaction and the Scope of the EIS.

In order to ensure proper and continued attention to Cleveland's concerns, we would like to maintain an on-going dialogue with you and your staff to effectively gauge local environmental concerns and provide helpful information to you. If you have any questions, please feel free to call me at (202) 565-1538. I look forward to speaking with you in the near future. Thank you and we appreciated the opportunity to meet with your staff

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Elaine K. Kaiser".

Elaine K. Kaiser
Chief

Section of Environmental Analysis

Enclosures

STB

FD-33388

10-30-97

K

ID-FEDS



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 24, 1997

CENTRAL ADMINISTRATIVE UNIT
REC'D: 10/30/97
DOCUMENT # 11/4/97 5:23:16 PM

Ms. Patricia Haman
U.S. Environmental Protection Agency
Office of Federal Activities
Ariel Rios Building, Room 7235
1200 Pennsylvania Avenue, NW
Washington, DC 20044

Re: STB/EPA October 9th Meeting on Air Quality Analysis for Proposed
Conrail Acquisition Draft EIS

Dear Ms. Haman:

My staff appreciated the opportunity to meet with you and EPA Region 2 staff in New York on October 9th to go over the approach we are developing to assess potential air quality impacts in the Draft EIS for the proposed Conrail Acquisition. The meeting was very helpful, and I would like in this letter to summarize my understanding of what was discussed and where we stand now.

At the meeting, staff from the Surface Transportation Board's Section of Environmental Analysis (SEA) provided an overview of the air quality analysis being undertaken in the Draft EIS for this 44,000 mile rail system project, and explained that our assessment encompasses local, regional, and systemwide air quality impacts. SEA staff also explained that train emissions from rail line segments and other facilities (rail yards and intermodal facilities), where traffic thresholds for air quality analysis in the Board's environmental rules would be triggered, have been used to determine which counties might have emissions increases above 100 tons per year (50 tons per year or 25 tons per year for NOx in serious or severe ozone nonattainment areas). NOx is the main pollutant of concern since other pollutants do not exceed emissions thresholds in the Board's environmental rules except for carbon monoxide at a few locations. Based on the SEA staff's description, EPA Region 2 generally viewed our approach to air quality analysis as reasonable and conservative. EPA staff also agreed that no impacts modeling is feasible in this case.

SEA and EPA staff then discussed different ways in which emission credits could be calculated to take into account the benefits of truck to rail diversions. SEA staff explained that

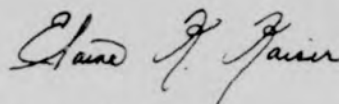
the agency's initial analysis had been done on a county-by-county basis, as provided in the railroads' environmental documentation, and expressed concern that approach did not accurately reflect potential truck to rail diversions because major highways do not always coincide with where train emissions arise. EPA staff agreed that a broader approach than a county approach would be appropriate in this proceeding. Specifically, EPA stated its concurrence with the Ozone Transport Assessment Group's (OTAG) findings that ozone formation is a large-scale process involving NOx emissions over the entire eastern half of the United States. EPA staff indicated that, given OTAG's findings, EPA was revising its view of ozone formation issues to broaden the geographic areas that may be considered as offset areas. EPA staff added that a regional or state-by-state approach might be appropriate in this case.

In addition, EPA staff noted that EPA has granted NOx waivers to certain areas including those that might be affected by the proposed Conrail Acquisition. EPA staff suggested that the Draft EIS could rely on these NOx waivers to show that NOx emissions above the 25, 50, or 100 ton thresholds discussed above are not significant. In response, SEA staff indicated that it would contact EPA regional offices to determine what nonattainment areas have NOx waivers and incorporate that information into the analysis in the Draft EIS.

Finally, SEA staff stated that it would contact you after they have ascertained where there are NOx waivers, and fine tuned the air quality analysis based on EPA's suggestions and the discussion at the meeting so that you are kept up to date.

If you disagree with my understanding of what transpired at the meeting please let me know as soon as possible. Again, we thank you for taking the time to come to New York and coordinating the meeting with EPA Region 2 staff and my staff. SEA appreciates the opportunity to go over these matters, consult with you, and clarify issues. We are looking forward to continuing to work with you as the EIS process progresses. Thank you again.

Sincerely yours,



Elaine K. Kaiser
Chief
Section of Environmental Analysis

cc: M. Arthurs, EPA
R. Kapichak, EPA
R. Kelly, EPA
J. Walsh, EPA
E. Liebsch, HDR
M. Wollschlager, HDR

STB

FD-33388

10-27-97

K

ID-CITIES



Erie County Dept. of Planning & Development
 Erie Regional Planning Commission

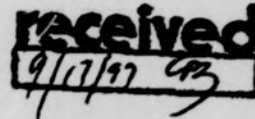
September 11, 1997

CENTRAL ADMINISTRATIVE UNIT

REC'D: 10/27/97

DOCUMENT # 11/6/97 11:17:20 AM

Mr. Carmen Gilotte
 DeLeur, Cather & Company
 1133 15th Street N.W.
 Washington, D.C. 20005



Dear Mr. Gilotte:

As per my telephone conversation with Jeff Johnson of your department, we have reviewed your proposal for construction of a rail line between Coen Road and Ridsen Road. As indicated to Mr. Johnson, the Comprehensive plan and zoning resolution for Vermilion Township designate the area between Coen Road and Ridsen Road as industrial and the area east of Coen Road is zoned Agricultural and it is noted that this area is not in designated a coastal management area and is not located in a floodplain; therefore, we are of the opinion that the construction of this line is consistent with our long-term and short-term planning documents. A copy of the Township Zoning Map is enclosed.

Sincerely,

Alex MacNicol
 Director

AM/jlk

Erie County - Lake Erie's Port of Opportunity

2900 Columbus Avenue,

Sandusky, Ohio 44870

(419) 627-7792

DEKALB COUNTY PLAN COMMISSIONOffice of the Building Commissioner

301 S Union St. - Auburn, IN 46706

August 25, 1997

CENTRAL ADMINISTRATIVE UNIT

REC'D: 10/27/97

DOCUMENT # 11/6/97 9:06:32 AM

Received

11/26/97

cm

Mr. Carmen Gilotte
DeLeuw, Cather & Company
1133 15th Street, N.W.
Washington DC 20005

RE: Finance Docket No. 33388 -- CSX & Norfolk Southern Control and Acquisition -- Conrail
Agency Consultation on Constructions

Dear Mr. Gilotte,

I received the above referenced documents from your department last Friday, August 22, 1997. As requested, I have reviewed the proposed rail segment connecting the existing NS and Conrail lines east of Butler, IN. As a result of this review, I have determined that the project lies within the corporate limits of the City of Butler. Note that the City of Butler has established a City Plan Commission which exercises zoning control within the city limits of Butler and as the jurisdiction of the DeKalb County Plan Commission stops at those city limits, I feel that the Butler City Planner, Mr. Joseph Iliff, should be contacted for additional comment on this project. Mr. Iliff can be reached at the following address.

JOSEPH ILIFF
City Planner

201 South Broadway
Butler, IN 46721
219-868-5200
Fax: 868-5852



With regards to the territory under the jurisdiction of the DeKalb County Plan Commission, I believe that the interconnection for between the NS and Conrail lines will substantially benefit the growing local industrial base in eastern DeKalb County by allowing transshipment from the NS along the CSX line to which there is an existing connection and along the Conrail line to which this project will make a new connection. Additionally, there is currently a large farmer's cooperative which relies on the existing Conrail line for shipments of grain to the eastern ports. For several years, individuals in the area have discussed exploring some way that the Conrail and NS lines could be connected thereby allowing local products more direct access to the southern ports and grain markets. Plans had progressed so far as to spur a feasibility study for a short line railroad operating as a switching yard between the Conrail and NS lines as well as serving the growing industrial corridor located Southwest of Butler along the NS line. The substantial

12-17-87 10:05 FROM DE LEW CHAIR AND CO 10 PAGE 4/52

DEKALB COUNTY PLAN COMMISSION

Office of the Building Commissioner

301 S Union St - Auburn, IN 46706

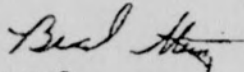
progress of the acquisition of Conrail by CSX and NS had placed the short line project on hold until the final impacts of the acquisition could be determined. It is my belief that the connecting rail segment between the Conrail and NS lines could reduce the immediate need for the short line project if not eliminate it entirely. Once NS has acquired the existing Conrail line and the new segment is in place, rail traffic from the existing Conrail line could possibly switch more easily to the NS line.

This project is consistent with the comprehensive land use plan for the county as it should support and further the present and future industrial growth in the area. The present and future zoning of the land involved is strictly the purview of the City of Butler.

The location of this project does not directly affect any prime agricultural lands. The land is within the Corporate Limits of Butler, is not used as agricultural land, is of such a size and shape that its agricultural use is extremely unlikely, and contains several existing structures.

The site is not within a designated coastal zone.

Respectfully,



Brad Stump
Zoning Administrator

O | R
P | C

OTTAWA REGIONAL PLANNING COMMISSION

COUNTY COURTHOUSE - Room 208 - 315 MADISON STREET - PORT CLINTON, OHIO 43452
Phone (419) 734-6780 - 898-7731 - 862-3232 - 855-8134 - FAX 734-6898

CENTRAL ADMINISTRATIVE UNIT

REC'D: 10/27/97

DOCUMENT # 11/10/97 1:12 42 PM

August 26, 1997

received
8/29/97

Mr. Carmen Gilotte
DeLeuw, Cather & Company
1133 15th Street, N.W.
Washington, D.C. 20005

RE: Finance Docket No. 33388
CSX and Norfolk Southern Control & Acquisition

Dear Mr. Gilotte:

You have requested information from my office relative to the environmental impact statement for the above referenced project. Please be advised that the following facts are submitted for your use in the preparation of said statement.

- 1a. The future land use plan for Salem Township identifies the area of the new construction for extensive type uses. Extensive is defined as agriculture, woodlots, and low density residential houselots on 2/3 of an acre or more of land. No specific review or recommendations are included in the plan for transportation.
- 1b. The proposed new construction would not be potentially inconsistent with the land use plan.
- 1c. The applicable zoning district is agricultural. In Ohio, Section 519.21.1 prohibits township zoning from regulating the location, erection, construction, reconstruction, change, alteration, maintenance, removal, use or enlargement of any buildings or structures of any railroad.
2. The area involved in the proposed construction is identified as prime agricultural lands. It would appear that only a very small amount of land will be removed from productivity by the proposed construction. Larger amounts would be removed if the land area were developed residentially.
3. The proposed construction location is not within a designated coastal zone nor would the construction adversely impact any existing land or water resources.

Should you have additional comments or questions, please do not hesitate to contact my office.

Sincerely,

Walter C. Wehenkel

Walter C. Wehenkel
Director

cc: file



City of Butler

201 South Broadway
Butler, Indiana 46721

Clerk Treasurer
(219) 868-5200
Department of
Water & Sanitation
(219) 868-5881
City Planner
(219) 868-5200
Fax
(219) 868-5882
E-mail
joe@butler.in.us

Wednesday, September 3, 1997

Carmen Gilotte
DeLeuw, Cather & Company
1133 Fifteenth Street, Northwest
Washington, DC 20005

received
9/8/97
CENTRAL ADMINISTRATIVE UNIT
REC'D: 10/27/97
DOCUMENT # 1164711 39.35 AM

Dear Mr. Carmen Gilotte,

This letter is in response to your request for review by the City of Butler, Indiana on the construction plans of the Norfolk Southern Railroad, pending their ownership of both rail lines that cross in Butler. I appreciate the information you have provided for us, and the conversation I had with Jeff Johnson to answers my questions. I would like to preface this by saying that I requested additional information on the projected traffic changes through town, but those have not arrived. With your deadline for my response so soon, I will have to base my review solely on the information you initially provided, but I would still like to receive additional details on the changes in traffic.

The last complete revision of the zoning map for the City of Butler was performed in 1991, and that map zones the areas immediately adjacent to the crossing of the railroads where the construction will take place as Local and General Business, Light Industrial, and a small amount of Two Family Residential and Mobile Home Residential. Today, the land uses at the crossing are similar. On the northwest side of US 6 and the NS tracks is city property, used by the utilities department. On the Northeast side is Evan's Equipment, a trucking company and heavy industrial use. On the westside of the NS Tracks, from US 6 to the Conrail tracks are a single family detached dwelling unit, and a bowling alley. On the eastside of the NS tracks from US 6 to the Conrail tracks is a small commercial site. On the westside of the NS tracks south of the Conrail tracks is railroad property, mainly unused, and a small unpaved access road from Beech Street to a few homes located on the eastside of the tracks, called Erie Street.

The Butler Plan Commission and I are in the process of developing new land use and zoning maps for the city. The maps drawn by me and reviewed by the plan commission so far show only minor changes. The house currently located between the bowling alley and the NS tracks would be zoned Two Family Residential rather than commercially. The two commercially zoned properties would both be General Business. The property zoned Mobile Residential would be changed to Single Family Residential, allowing single family detached dwelling units, but not mobile homes. All of these still proposed changes are minor, and are not inconsistent with the NS construction proposal.

Butler has no prime farmland or coastal zone areas to be affected by this construction.

The other concern of the City of Butler with the construction and projected traffic changes is with the safety equipment at two of our four railroad crossings in the city. The crossing of US 6 and the NS tracks is currently only one track, but the construction will make it double tracked. The safety equipment must satisfy the needs of a double track, and the projected increase in train traffic from 15 to 17 trains daily. The crossing of the current Conrail line and Federal Street on the westside of the city is the only one without the safety arms which block vehicular traffic during a train crossing. It has only constantly flashing yellow lights. Although the projected level of trains at that crossing is



City of Butler

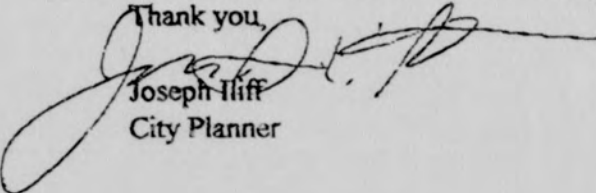
201 South Broadway
Butler, Indiana 46721

Clerk Treasurer
(219) 868-5200
Department of
Water & Sanitation
(219) 868-5881
City Planner
(219) 868-5200
Fax
(219) 868-5882
E-mail
joe@butler.in.us

expected to drop from 51 to 40 trains daily, the pedestrian and vehicular traffic is expected to increase along Federal Street as properties to the south and west of the city are developed into residential and recreational uses. Federal Street is an important collector street for the southwest corner of the city, and the safety equipment at that crossing needs to reflect the increased traffic along it.

In conclusion, I have found no inconsistencies between the proposed construction of Norfolk Southern, and the current and proposed land use plans of the City of Butler. I have enclosed copies of our zoning maps dated 1991 showing the two areas I have addressed. As I mentioned, I would still like to receive more detailed projections showing the changes in train traffic in every direction into and out of the city. Please contact me if you have further questions or concerns on this matter.

Thank you,

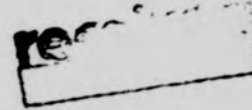

Joseph Illiff
City Planner



CITY OF PORTAGE

Department of Planning

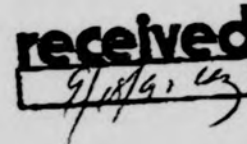
CITY HALL
6070 CENTRAL AVENUE
PORTAGE, INDIANA 46368
762-7607



CENTRAL ADMINISTRATIVE UNIT

REC'D: 10/27/97

DOCUMENT # 11/6/97 11:207 AM



September 11, 1997

Mr. Carmen Gilotte
DeLeuw, Cather & Company
1133 15th Street, N.W.
Washington, D.C. 20005

RE: Finance Docket No. 33388 - CSX and Norfolk
Southern Control and Acquisition - Conrail: Agency
Consultation on Constructions

Dear Mr. Gilotte:

This letter is in response to your request for a review of the proposed rail line construction in Portage. The existing rail lines are included in the land use map for the city. The railway is zoned I-1, Light Industrial. The property to the north is zoned Recreational/Open Space. The property to the south is zoned C-2, Community Business. The area to the west is zoned R-2, Single Family and the property to the east is zoned C-1, Local Business, and R-1, Single Family. There are no plans by the city to change that zoning.

There is a historic site and landmark on the north side of the railroad property in the city park.

The increase in the number of trains which will be traveling through the residential areas will present a problem to the adjacent neighbors. There is a visibility problem with the crossing which crosses Samuelson Road just south of Old Porter Road. This is a dangerous intersection because there is a change in the elevation of the road at that point. The intersection is on the north side of the track and lower than the tracks. There is another dangerous intersection approximately 1/4 of a mile to the east. Oak Tree Mobile Home Park is located on the south side of the tracks. The only

0-27-97 10:11 FROM: DE LEON CATHEN AND CO 10
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CITY OF PORTAGE, INDIANA
PLANNING/BUILDING DEPARTMENT

entrance from this Park is across the tracks. Most of the residents of the mobile home park are senior citizens and an increase in the number of trains traveling at the permitted speed limits create a dangerous combination. The crossing at the mobile home park has flashing lights but there are no gates.

There is no agricultural land within this construction area in the City of Portage.

This property is not within a coastal zone management area.

We understand the need to improve the rail lines. However, the permitted speed and the increase in the number of trains going through the city will create safety problems for residents in that area. The noise level is so high in the city park that conversation must stop when a train is passing through. Would it be possible for you to plant evergreen trees along your right of way to help screen out some of the noise? We would also like to request that you reduce the maximum speed allowed for passenger and freight trains in a residential area.

Thank you for any consideration which you may be able to give to our concerns. If you have any questions you may contact me at 219-762-7607.

Sincerely,

Janet K Barkowski

Janet K. Barkowski
Portage City Planner



CITY OF DETROIT
PLANNING & DEVELOPMENT DEPARTMENT

2300 CADILLAC TOWER
DETROIT, MICHIGAN 48226
PHONE 313-224-6380
FAX 313-224-1629

150 MICHIGAN AVE.
DETROIT, MICHIGAN 48226
PHONE 313-224-2560
FAX 313-224-4579

CENTRAL ADMINISTRATIVE UNIT

REC'D: 10/27/97

DOCUMENT # 11/6/97 10:58:03 AM September 29, 1997

Mr. Carmen Gilotte
Deleuw, Cather & Company
1133 15th Street, N.W.
Washington, DC 20005

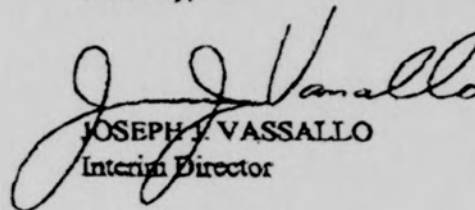
Dear Mr. Gilotte:

The City of Detroit Planning & Development Department has reviewed the environmental impact of the proposed rail line segment construction of Ecorse Junction. Based on our review, below are answers to the questions raised:

- 1) The proposed plan is consistent with the future land-use plan and current zoning.
- 2) The proposed plan has no effect on prime agricultural land.
- 3) The proposed plan has no effect on any land or water resources.

If you have any questions, please contact myself or Thomas Walters, Executive Manager of our Planning Section at (313) 224-1421.

Sincerely,


JOSEPH J. VASSALLO
Interim Director

JJV/vh

cc: Thomas Walters

DENNIS W. ARCHER, MAYOR

10-27-97 10:15 FROM DE LEW CHAIR AND CO 101
PAGE 46/52

ATTENTION: Carmen Gilotte

EDGAR COUNTY BOARD

SEPTEMBER 30, 1997

1. By abandoning the railroad it is consistent with the land use plan.
2. It would have no effect on prime farm land.
3. Coastal zone does not pertain to this area.
4. At this time we are not interested in getting involved with constructing anything in place of the railway.

Adonna Bennett

Adonna Bennett
Edgar County Board Chairman

received
10/1/97 az
3

STB

FD-33388

10-27-97

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ID-CITIES

COUNTY - PORTER



Administration Center
155 Indiana Avenue - Suite 304
Valparaiso, Indiana 46383

PLAN COMMISSION

(219) 465-3540

August 25, 1997

Mr. Carmen Gilotte
DeLeuw, Cather & Company
1133 15th Street, N.W.
Washington, DC 20005

CENTRAL ADMINISTRATIVE UNIT
REC'D: 10/27/97

DOCUMENT # 11/16/97 1:07:09 PM

received
8/29/97

Re: Finance Docket No. 33388 - CSX and Norfolk Southern.

Dear Mr. Gilotte,

In response to the Surface Transportation Board Letter for the rail line construction in Willow Creek. This construction is not within the unincorporated jurisdiction of the Porter County Plan Commission. The proposed construction is within the City of Portage, following is the Portage City Planner's name and address.

Janet Barkowski
Portage City Planner
6070 P. Central Ave.
Portage, IN 46368

(219) 762-7607

If could be of further help please contact my office.

Sincerely,

Robert W. Thompson, Jr.
Robert W. Thompson, Jr.
Executive Director

cc: file

STB

FD-33388

10-27-97

K

ID-CITIES

Area Plan Commission of St. Joseph County

1140 County-City Building
South Bend, Indiana 46601

Robert W. Sante
Executive Director

John W. Byorni
Assistant Director

Phone 219 235-9571

Fax 219 235-9813

August 29, 1997

CENTRAL ADMINISTRATIVE UNIT

REC'D: 10/27/97

DOCUMENT # 11/6/97 1:02:48 PM

received
9/5/97

Mr. Carmen Gilotte
DeLeuw, Cather & Company
1133 15th Street, NW
Washington, DC 20005

Re: Proposed South Bend to Dillon Junction Rail Abandonment

Dear Mr. Gilotte:

Thank you for the opportunity to review the proposed abandonment of the above referenced rail line. Unfortunately, the time frame in which you need to have our response, does not allow the staff sufficient time to fully review the proposed abandonment.

Based on a cursory review, it does not appear that the proposed abandonment would have any effect upon adjacent land uses or prime agricultural lands. It does appear that some, if not all of the line, would be suitable for a rails to trails corridor. Our agency is not directly involved in rails to trails planning. Some of the agencies that should address this issue would be the Michiana Area Council of Governments (MACOG), the City of South Bend Community Development Department, and the St. Joseph County Park and Recreation Department. It is my understanding that MACOG has already been notified of this proposal.

If you have any questions, please feel free to contact me.

Sincerely,

John W. Byorni
John W. Byorni



STB

FD-33388

10-27-97

K

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

CENTRAL ADMINISTRATIVE UNIT
REC'D: 10/29/97
DOCUMENT # 11/4/97 5:27:31 PM

Section of Environmental Analysis

October 27, 1997

Henry Kinsel, Chairman
La Porte County Commission
813 Lincoln Way
La Porte, Indiana 43650

Re: Finance Docket No. 33388 (AB 290 Sub 195X) -- CSX and Norfolk Southern --
Control and Acquisition -- Conrail: Proposed Action on the Dillon Junction to
Michigan City, Indiana Branch Line

Dear Mr. Kinsel:

Thank you for your inquiry of October 13, 1997 on behalf of your constituents in La Porte County, Indiana. This letter is in response to your concerns about Norfolk Southern's proposed abandonment of the branch line between Dillon Junction and Michigan City in La Porte County, Indiana.

On June 23, 1997, CSX Corporation and CSX Transportation, Inc. (CSX), Norfolk Southern Corporation and Norfolk Southern Railway Company (NS), and Conrail, Inc. and Consolidated Rail Corporation (Conrail) filed a consolidation application with the Surface Transportation Board (Board) under 49 U.S.C. 11323-25. NS, CSX, and Conrail are jointly seeking authority for NS and CSX to acquire control of Conrail and for the subsequent division of Conrail's assets. In the Environmental Report (ER) submitted by the applicants with the application (Environmental Report Volume 6C, pages 45-98), NS proposed and discussed the potential environmental impacts of two abandonment projects:

- Dillon Junction to Michigan City (21.5 miles)
- South Bend to Dillon Junction (21.5 miles)

On August 28, 1997, NS informed the Board in a Supplemental Environmental Report (SER) of a change in plans for the proposed Dillon Junction to Michigan City, Indiana abandonment. NS no longer plans to abandon the 21.5 mile branch line from Dillon Junction to Michigan City, and plans to sell the branch line to Chicago, South Shore & South Bend Railroad. On October 6, 1997, NS filed with the Board a Notice of Withdrawal of Related Petition for

Exemption, requesting that the Board consider this new plan. Board Decision No. 48, issued on October 23, 1997, acknowledged this request and ordered the discontinuation of the abandonment proceeding (AB 290 Sub 195X). NS, however, still proposes to abandon the branch line from South Bend to Dillon Junction.

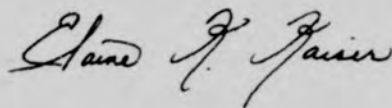
The Board's Section of Environmental Analysis (SEA) is conducting an environmental review of the potential environmental impacts associated with the proposed Conrail acquisition and will prepare an Environmental Impact Statement (EIS). As part of its environmental review, SEA will address the potential environmental impacts of all proposed rail line abandonments, including safety, transportation systems, land use, energy, air quality, noise, biological resources, water resources, environmental justice, and cultural and historic resources.

The Final Scope of the EIS was published on October 1, 1997 in the *Federal Register*. On September 30, 1997, this Scope was mailed to 1,950 public agencies, interested parties, and official parties of record to this proceeding. A copy of the Final Scope of the EIS, the relevant portions of the ER, SER (pages 40-50), Notice of Withdrawal of Related Petition for Exemption, and Board Decision No. 48 are enclosed for your reference.

Under the current procedural schedule adopted by the Board, SEA plans to issue the Draft EIS in November 1997, with a forty-five day public review and comment period. After conducting an independent environmental analysis, reviewing all environmental information available to date, consulting with appropriate agencies, and fully considering all public comments, SEA plans to issue a Final EIS in April 1998 for consideration by the Board. In its final decision, the Board will consider the entire environmental record, including all public comments, the Draft EIS, and the Final EIS. The Board will issue its final written decision in June 1998.

If you have additional questions concerning the environmental review process, please contact Mike Dalton, SEA Project Manager for the Conrail Acquisition, at (202) 565-1530.

Sincerely yours,



Elaine K. Kaiser
Chief
Section of Environmental Analysis

Enclosures

cc: Tim Janatik (all enclosures)
Jim Kruse (all enclosures)
Clay Turner (all enclosures)

STB

FD-33388

10-23-97

K

ID-GOV



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 23, 1997

Dr. Brent D. Glass
State Historic Preservation Officer
Pennsylvania Historical & Museum Commission
3rd & North Streets
Harrisburg, PA 17108

Re: Finance Docket No. 33388 - CSX and Norfolk Southern - Control and Acquisition - Conrail: National Historic Preservation Act, Section 106; Pennsylvania SHPO Reference Numbers: ER 97-0776-042-I, ER 92-1607-003-A, ER 97-1017-101-A, ER 97-0776-042-D, ER 97-0776-042-B, ER 97-0776-042-A, ER 97-0837-007-A

Dear Dr. Glass:

On June 23, 1997, CSX Corporation and CSX Transportation, Inc. (CSX); Norfolk Southern Corporation, and Norfolk Southern Railway Company (NS); and Conrail Inc. and Consolidated Rail Corporation (Conrail) filed a consolidated Railroad Control Application (RCA) with the Surface Transportation Board (STB) under 49 U.S.C. 11323-25. CSX, NS and Conrail (collectively the Railroads) are jointly seeking authority for CSX and NS to acquire control of Conrail, and for the subsequent division of Conrail's assets (the Acquisition). The RCA is the action that formally initiates this proposed undertaking and our role as the Federal lead agency.

The purpose of this letter is to initiate consultation with your office in accordance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing guidelines (36 CFR Part 800). Consequently, the Section of Environmental Analysis (SEA) is seeking your comment regarding those projects within our jurisdiction that may have the potential to affect historic properties.¹ This effort is being coordinated with preparation of an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA).

¹ STB may impose conditions on rail line abandonments and new construction, but has limited jurisdiction over the acquisition-related activities. See 49 CFR Part 1105.8.

A copy of the Environmental Report (ER) submitted with the RCA was sent to your office by the railroads. SEA has received copies of the following letters from you:

- January 22, 1997 requesting information on boundaries and scope for increases in traffic in rail yards in Beaver County northwest of Pittsburgh.
- January 24, 1997 requesting survey of historic structures adjacent to new rail line connections in Philadelphia and Pittsburgh.
- January 31, 1997 suggesting likelihood of historic resources adjacent to rail line segments expected to experience traffic increases.
- February 13, 1997 suggesting likelihood of historic resources adjacent to projects in Allegheny, Dauphin, Lehigh and Philadelphia Counties.
- February 24, 1997 stating adjacency of National Register properties to J & L Tunnel construction projects in Pittsburgh.
- March 24, 1997 stating adjacency of National Register properties to Greenwich Intermodal Facility in Philadelphia and to the Enola Yard in Harrisburg.
- July 31, 1997 stating ER fails to account for National Register listed properties including the Pennsylvania Main Line and the Rutherford Yard which are potentially affected by the merger.

SEA's review of the ER indicates that only two of the proposed acquisition-related activities in the Commonwealth of Pennsylvania may impact historic structures or sites. The first project is the proposed expansion of the existing intermodal facility at the yard in **Allentown** (CR to NS). The other project is the expansion of the Enola Yard in **Harrisburg** (CR to NS). SEA has requested additional detailed information from NS regarding the proposed work at these two yards so that a final determination of potential impacts can be made.

In addition, NS is considering a proposed 6.25 mile realignment of its right-of-way through Erie. At the present time, it is unclear whether this proposed realignment is part of the acquisition. The present Conrail and NS main lines run close and nearly parallel to each other from Cleveland, OH to Buffalo, NY, and separate for a few miles through Erie. The Conrail mainline runs through Erie on an elevated right-of-way constructed as part of a grade separation project completed in the late 1920's. The NS (former Nickel Plate) mainline runs down the middle of Nineteenth Street on an alignment dating to March 1882. Under the proposed realignment, NS trackage would cross over onto the Conrail (future CSX) right-of-way within the shared rights-of-way at each end of the realignment. This would eliminate the slow and

hazardous train movements running on Nineteenth Street for NS.

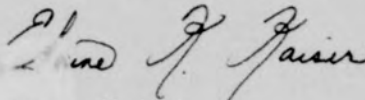
The existing Conrail right-of-way originally contained four to nine parallel tracks and now contains only three tracks, so it can easily accommodate another single line where the former track has been removed. There are no impacts to cultural resources along the existing Conrail right-of-way. If NS ultimately abandoned the Nineteenth Street line, the historic crossing guard shanties and traffic control systems along the street would be the only potentially historic resources under STB jurisdiction. If it is determined that this proposed realignment is part of the acquisition, STB will make a determination of effect and consult with you.

CSX has also proposed the construction of a new 4,900-foot connection at Grays Ferry Bridge and the 25th Street Viaduct in Philadelphia called the Eastwick Connection that may be a component of the acquisition. If it is determined that this proposed connection is a part of the acquisition, STB will make a determination of effect and continue consultation with you.

SEA requests your concurrence with its finding that the acquisition will have no effect on historic resources in the Commonwealth of Pennsylvania except for the expansion of the intermodal facility at Allentown, expansion of the Enola Yard in Harrisburg, and the two above-described projects which may become part of the acquisition.

We look forward to your response on this matter as rapidly as your schedule will allow. If you have any questions, please call SEA's cultural resources technical team leader for the acquisition, Barry Wharton of HDR Engineering, Inc., at (813) 287-1960 for assistance.

Sincerely yours,



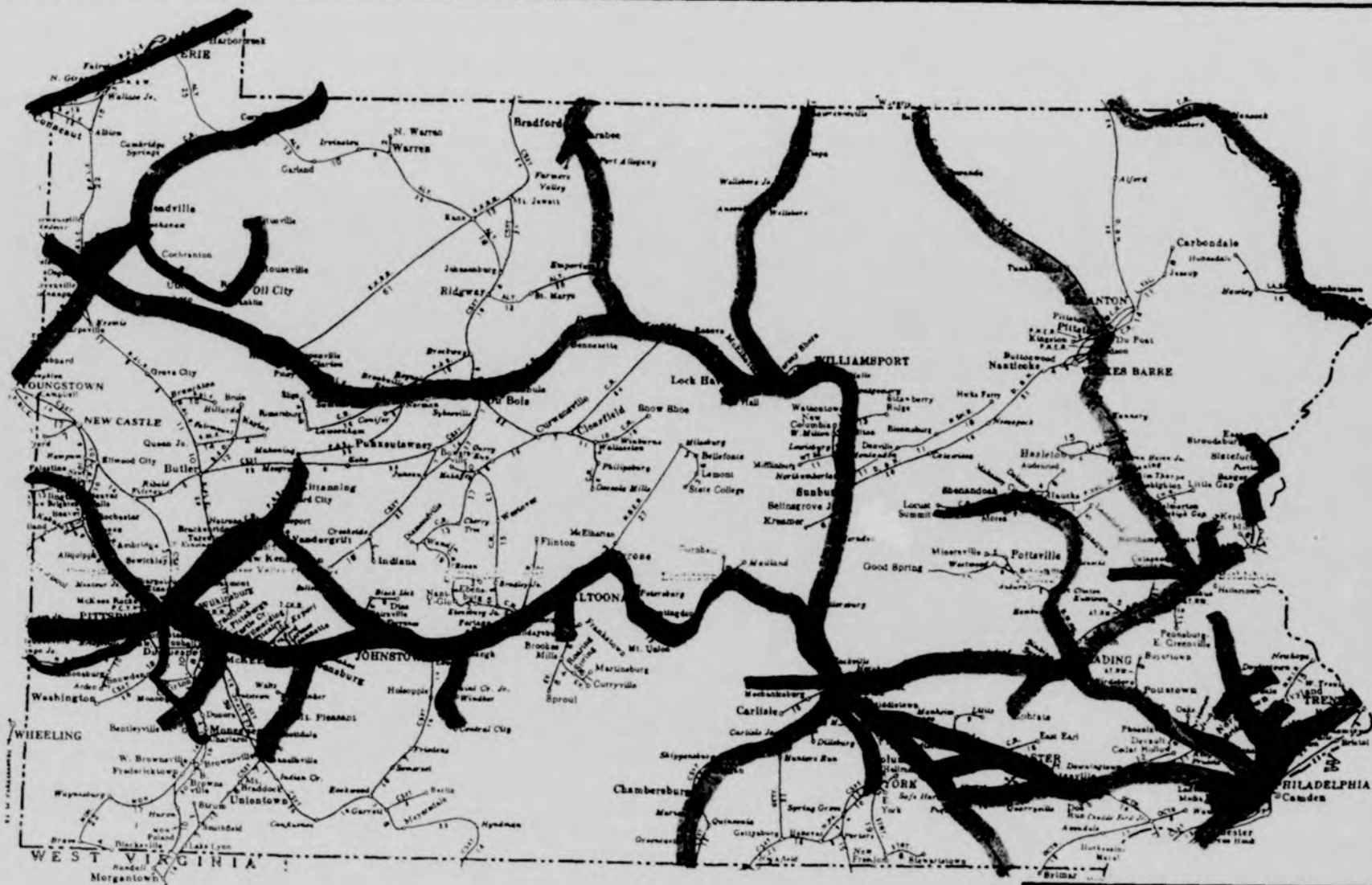
Thomas K. Kaiser

Chief

Section of Environmental Analysis

Enclosure: Pennsylvania Railroad Map

cc: Paul McGinley, MHA
John Morton, HDR
William Novak, DCCO
Barry Wharton, HDR



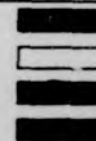
Pennsylvania

Conrail

CSX

NS

Acquisition Projects



STB

FD-33388

10-23-97

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 23, 1997

Mr. H. Alexander Wise, Jr.
State Historic Preservation Officer
Virginia Department of Historic Resources
221 Governor Street
Richmond, VA 23219

Re: Finance Docket No. 33388 - CSX and Norfolk Southern - Control and
Acquisition - Conrail: National Historic Preservation Act, Section 106
Virginia SHPO Reference Number: 97-0190-F

Dear Mr. Wise:

On June 23, 1997, CSX Corporation and CSX Transportation, Inc. (CSX); Norfolk Southern Corporation, and Norfolk Southern Railway Company (NS); and Conrail Inc. and Consolidated Rail Corporation (Conrail) filed a consolidated Railroad Control Application (RCA) with the Surface Transportation Board (STB) under 49 U.S.C. 11323-25. CSX, NS and Conrail (collectively the Railroads) are jointly seeking authority for CSX and NS to acquire control of Conrail, and for the subsequent division of Conrail's assets (the Acquisition). The RCA is the action that formally initiates this proposed undertaking and our role as the Federal lead agency.

The purpose of this letter is to initiate consultation with your office in accordance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing guidelines (36 CFR Part 800). Consequently, the Section of Environmental Analysis (SEA) is seeking your comment regarding those projects within our jurisdiction that may have the potential to affect historic properties.¹ This effort is being coordinated with preparation of an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA).

¹ STB may impose conditions on rail line abandonments and new construction, but has limited jurisdiction over the acquisition-related activities. See 49 CFR Part 1105.8.

A copy of the Environmental Report (ER) submitted with the RCA was sent to your office by the railroads. SEA has received copies of the following letters from you:

- February 19, 1997, to Burns & McDonnell requesting maps with boundaries of projects in the Commonwealth of Virginia.
- February 19, 1997, to Dames & Moore requesting maps with boundaries of projects in The Commonwealth of Virginia.
- March 5, 1997, to Dames & Moore requesting maps locating projects along right of way from Richmond to Doswell.

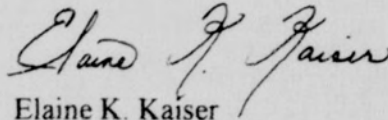
SEA's review of the ER indicates that acquisition-related activities are limited in the Commonwealth of Virginia to traffic increases on rail line segments between Riverton Junction and Randolph Street (Roanoke) and between Harrisburg, PA and Riverton Junction, VA. Increased traffic is limited to the moving and handling of more rail cars on the existing trackage. Increased traffic does not have the potential to affect historic or cultural resources since the railroad traffic is part of the historic setting and does not involve ground disturbance or physical alteration of the existing facilities.

No rail lines are proposed to be abandoned and no other acquisition-related activities are proposed except a potential expansion of a passing track of approximately 6,000 linear feet between mileposts 380.5 and 379.3 on the former Norfolk & Western main line in Glade Springs between Roanoke and Bristol, VA. Our review indicates the Glade Springs Historic District (NRHP Eligible) is bisected by this rail line and a prehistoric site and a NRHP structure abut the existing railroad right of way. SEA has requested additional information from NS to clarify whether this proposed project is part of the acquisition and to define the nature of the improvements. As soon as the railroad provides the requested information, SEA will determine whether the proposed passing track extension in Glade Springs is part of the acquisition and if so, will evaluate the potential for effect on historic and cultural resources under Section 106 and will continue consultation with your office.

Except for the proposed passing track extension in Glade Springs, SEA requests your concurrence with its finding that the acquisition would have no effect on historic resources in the Commonwealth of Virginia and that Section 106 consultation with your office has been

completed. We look forward to your response on this matter as rapidly as your schedule will allow. If you have any questions, please call SEA's cultural resources technical team leader for the acquisition, Barry Wharton of HDR Engineering, Inc., at (813) 287-1960 for assistance.

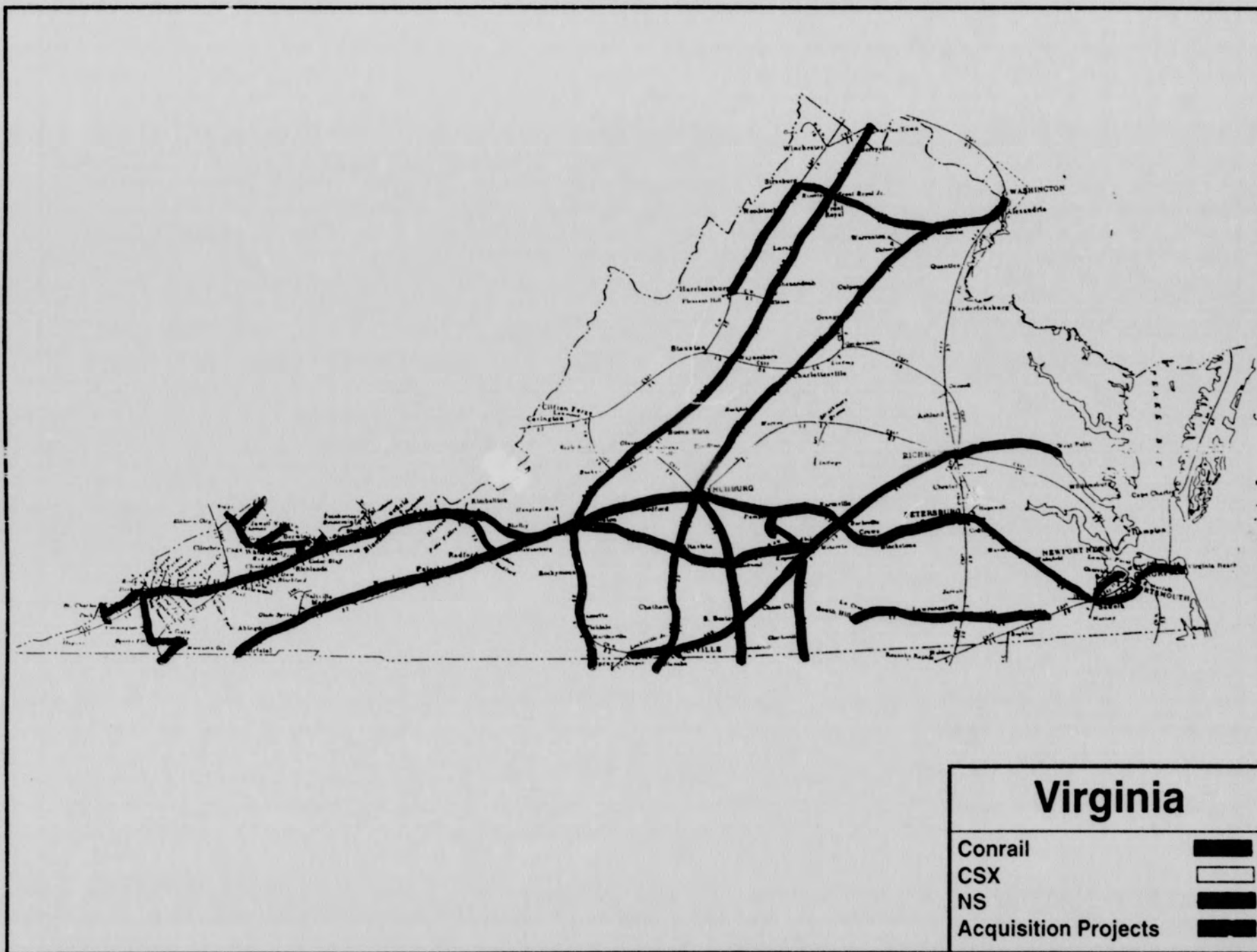
Sincerely yours,

A handwritten signature in cursive script, appearing to read "Elaine K. Kaiser".

Elaine K. Kaiser
Chief
Section of Environmental Analysis

Enclosure: Virginia Railroad Map

cc: Paul McGinley, MHA
John Morton, HDR
William Novak, DCCO
Barry Wharton, HDR



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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 23, 1997

Ms. Bernadette Castro
State Historic Preservation Officer
Parks, Recreation & Historic Preservation
Agency Building #1, Empire State Plaza
Albany, NY 12238

Re: Finance Docket No. 33388 - CSX and Norfolk Southern - Control and
Acquisition - Conrail: National Historic Preservation Act, Section 106;
New York SHPO Reference Number: 97PR0090

Dear Ms. Castro:

On June 23, 1997, CSX Corporation and CSX Transportation, Inc. (CSX); Norfolk Southern Corporation, and Norfolk Southern Railway Company (NS); and Conrail Inc. and Consolidated Rail Corporation (Conrail) filed a consolidated Railroad Control Application (RCA) with the Surface Transportation Board (STB) under 49 U.S.C. 11323-25. CSX, NS and Conrail (collectively the Railroads) are jointly seeking authority for CSX and NS to acquire control of Conrail, and for the subsequent division of Conrail's assets (the Acquisition). The RCA is the action that formally initiates this proposed undertaking and our role as the Federal lead agency.

The purpose of this letter is to initiate consultation with your office in accordance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing guidelines (36 CFR Part 800). Consequently, the Section of Environmental Analysis (SEA) is seeking your comment regarding those projects within our jurisdiction that may have the potential to affect historic properties.¹ This effort is being coordinated with preparation of an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA).

¹ STB may impose conditions on rail line abandonments and new construction, but has limited jurisdiction over the acquisition-related activities. See 49 CFR Part 1105.8.

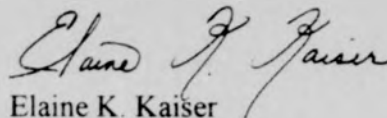
A copy of the Environmental Report (ER) submitted with the RCA was sent to your office by the railroads. SEA has received a copy of your March 11, 1997 letter stating that it is the SHPO's opinion that the project will have No Effect upon cultural resources eligible for inclusion in the National Register of Historic Places.

SEA's review of the ER indicates that acquisition-related activities in the State of New York are limited to: (1) construction of a 5,200-foot connection of the NS Erie Line from Gardenville Junction to the Conrail Main Line at Blasdell, New York (NS); (2) a 1,700-foot connection at Gardenville Junction from the Conrail Buffalo Line to the Conrail Ebenezer Secondary Line at West Seneca, New York; and (3) increased rail traffic at the Buffalo Junction Intermodal Yard (NS) in Cheektowaga, New York.

SEA's review of these three acquisition project sites indicates that there are no historic or cultural resources present except for an abandoned, two-span riveted Pratt through-truss bridge at the proposed connection at Blasdell, New York. The proposed connection is a re-establishment of a previously removed rail link and the existing bridge is in relatively good condition. The proposal will reactivate the use of this resource as a railroad bridge and ensure its preservation. In our opinion, the proposed action will have no effect on this resource.

Based on this information and in accordance with the rules and regulations found in 36 CFR Part 800.5b, SEA requests your concurrence with its finding that the acquisition would have no effect on historic resources in the State of New York and that Section 106 consultation with your office has been completed. We look forward to your response on this matter as rapidly as your schedule will allow. If you have any questions, please call SEA's cultural resources technical team leader for the acquisition, Barry Wharton of HDR Engineering, Inc., at (813) 287-1960 for assistance.

Sincerely yours,



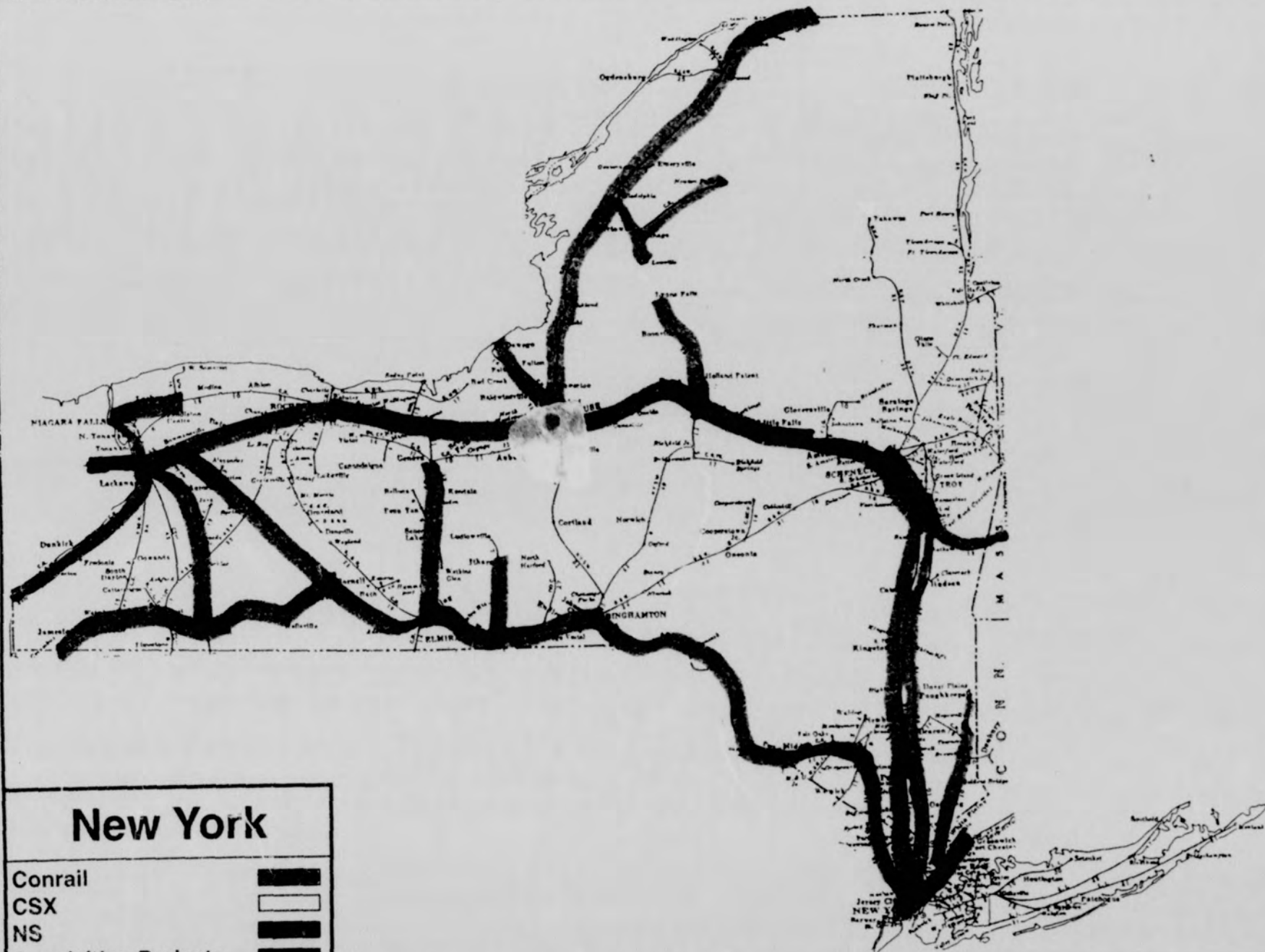
Elaine K. Kaiser

Chief

Section of Environmental Analysis

Enclosure: New York Railroad Map

cc: Paul McGinley, MHA
John Morton, HDR
William Novak, DCCO
Barry Wharton, HDR



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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 23, 1997

Mr. Robert Shinn
State Historic Preservation Officer
Department of Environmental Protection
CN-402, 401 East State Street
Trenton, NJ 08625

Re: Finance Docket No. 33388 - CSX and Norfolk Southern - Control and
Acquisition - Conrail: National Historic Preservation Act, Section 106;
New Jersey SHPO Reference Number: HPO-C97-33

Dear Mr. Shinn:

On June 23, 1997, CSX Corporation and CSX Transportation, Inc. (CSX); Norfolk Southern Corporation, and Norfolk Southern Railway Company (NS); and Conrail Inc. and Consolidated Rail Corporation (Conrail) filed a consolidated Railroad Control Application (RCA) with the Surface Transportation Board (STB) under 49 U.S.C. 11323-25. CSX, NS and Conrail (collectively the Railroads) are jointly seeking authority for CSX and NS to acquire control of Conrail, and for the subsequent division of Conrail's assets (the Acquisition). The RCA is the action that formally initiates this proposed undertaking and our role as the Federal lead agency.

The purpose of this letter is to initiate consultation with your office in accordance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing guidelines (36 CFR Part 800). Consequently, the Section of Environmental Analysis (SEA) is seeking your comment regarding those projects within our jurisdiction that may have the potential to affect historic properties.¹ This effort is being coordinated with preparation of an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA).

¹ STB may impose conditions on rail line abandonments and new construction, but has limited jurisdiction over the acquisition-related activities. See 49 CFR Part 1105.8.

A copy of the Environmental Report (ER) submitted with the RCA was sent to your office by the railroads. SEA has received a copy of your letter of March 5, 1997 stating that it appears unlikely that the acquisition will directly affect historic properties.

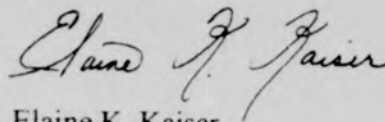
SEA's review of the ER indicates that acquisition-related activities in the State of New Jersey are limited to construction of 480-foot and 600-foot connections in Ridgefield (CR Shared Assets Area) and improvements within Conrail's E-Rail Intermodal Facility in Elizabeth. The shops of the former Central Railroad of New Jersey (CNJ) are located at E-Rail. There are no historic resources that will be affected by the two proposed connections at Little Ferry.

In addition, NS may be considering the construction of a 12,500-foot passing siding at Flemington Junction as part of the Conrail acquisition. This siding may impact an historic district, a depot and archaeological sites.

SEA has requested additional information from NS to clarify whether the proposed projects at Elizabeth and Flemington Junction are part of this acquisition and to define the nature of the proposed improvements. As soon as the requested information is received from NS, SEA will determine the area of potential effect on historic and cultural resources under Section 106 and will continue consultation with your office.

Except for the proposed projects at Elizabeth and Flemington Junction, SEA requests your concurrence with its finding that the acquisition would have no effect on historic resources in the State of New Jersey, and that Section 106 consultation with your office has been completed in accordance with the rules and regulations found in 36 CFR Part 800.5(b). We look forward to your response on this matter as rapidly as your schedule will allow. If you have any questions, please call SEA's cultural resources technical team leader for the acquisition, Barry Wharton of HDR Engineering, Inc., at (813) 287-1960 for assistance.

Sincerely yours,



Elaine K. Kaiser
Chief
Section of Environmental Analysis

Enclosure: New Jersey Railroad Map

cc: Paul McGinley, MHA
John Morton, HDR
William Novak, DCCO
Barry Wharton, HDR



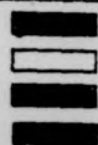
New Jersey

Conrail

CSX

NS

Acquisition Projects



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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 23, 1997

Mr. David A. Shorr
State Historic Preservation Officer
State Department of Natural Resources
205 Jefferson, P. O. Box 176
Jefferson City, MO 65102

Re: Finance Docket No. 33388 - CSX and Norfolk Southern - Control and
Acquisition - Conrail: National Historic Preservation Act, Section 106

Dear Mr. Shorr:

On June 23, 1997, CSX Corporation and CSX Transportation, Inc. (CSX); Norfolk Southern Corporation, and Norfolk Southern Railway Company (NS); and Conrail Inc. and Consolidated Rail Corporation (Conrail) filed a consolidated Railroad Control Application (RCA) with the Surface Transportation Board (STB) under 49 U.S.C. 11323-25. CSX, NS and Conrail (collectively the Railroads) are jointly seeking authority for CSX and NS to acquire control of Conrail, and for the subsequent division of Conrail's assets (the Acquisition). The RCA is the action that formally initiates this proposed undertaking and our role as the Federal lead agency.

The purpose of this letter is to initiate consultation with your office in accordance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing guidelines (36 CFR Part 800). Consequently, the Section of Environmental Analysis (SEA) is seeking your comment regarding those projects within our jurisdiction that may have the potential to affect historic properties.¹ This effort is being coordinated with preparation of an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA).

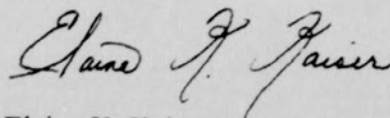
A copy of the Environmental Report (ER) submitted with the Railroad Control Application (RCA) was sent to your office by the Railroads. SEA's review of the ER indicates that in the State of Missouri there are no proposed changes to rail line segments, rail yards, or

¹ STB may impose conditions on rail line abandonments and new construction, but has limited jurisdiction over the acquisition-related activities. See 49 CFR Part 1105.8.

intermodal facilities, and no new construction projects. No rail lines are proposed to be abandoned, and no other acquisition-related activities are proposed.

Based on this information and in accordance with the rules and regulations found in 36 CFR Part 800.5(b), SEA requests your concurrence with its finding that the Acquisition would have no effect on historic resources in the State of Missouri and that Section 106 consultation with your office has been completed. We look forward to your response on this matter as rapidly as your schedule will allow. If you have any questions, please call SEA's cultural resources technical team leader for the acquisition, Barry Wharton of HDR Engineering, Inc., at (813) 287-1960 for assistance.

Sincerely yours,

A handwritten signature in cursive script, reading "Elaine K. Kaiser".

Elaine K. Kaiser

Chief

Section of Environmental Analysis

Enclosure: Missouri Railroad Map

cc: Paul McGinley, MHA
John Morton, HDR
William Novak, DCCO
Barry Wharton, HDR

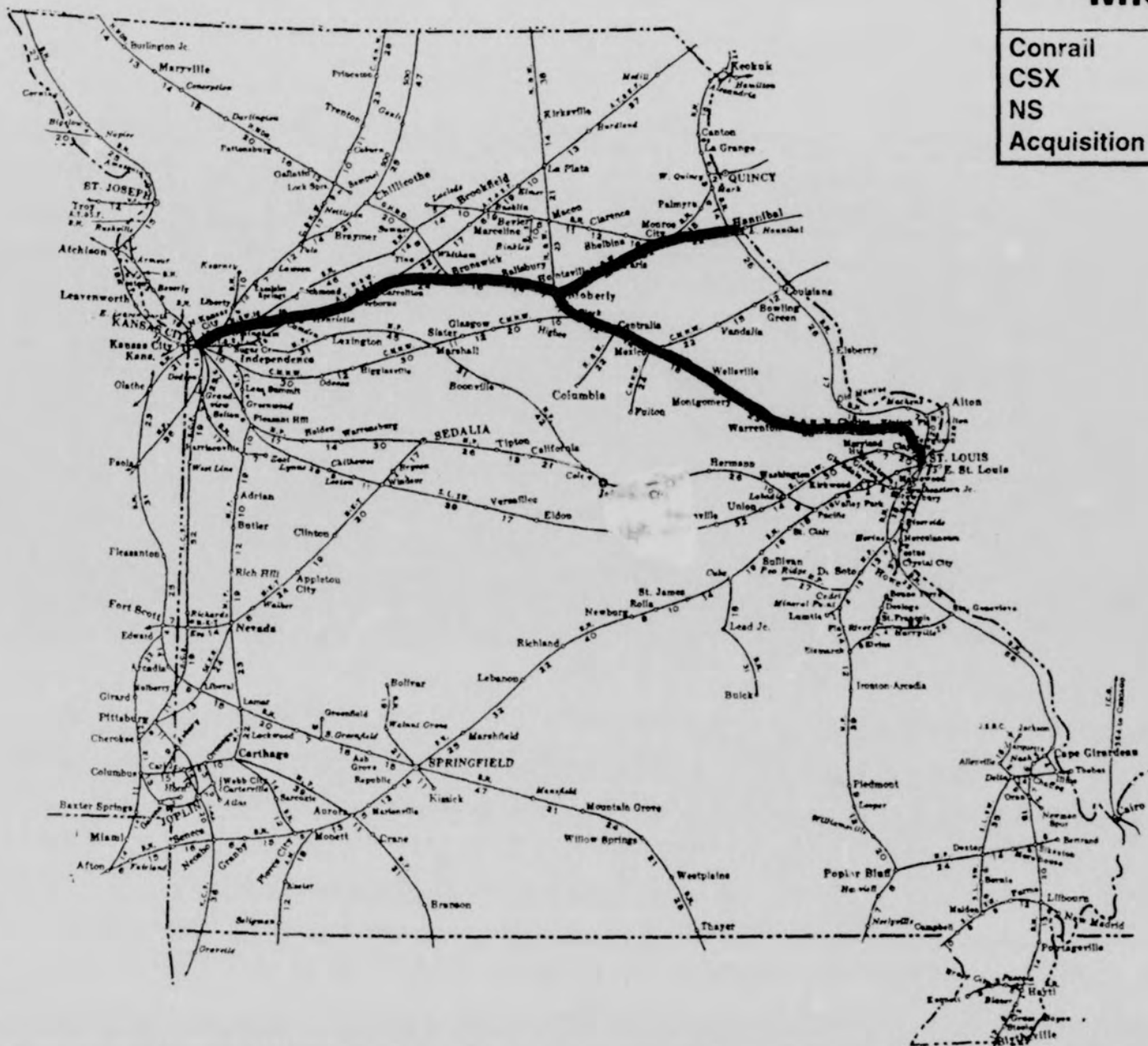
Missouri

Conrail

CSX

NS

Acquisition Projects



STB

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 23, 1997

Ms. Anne Haaker
Deputy State Historic Preservation Officer
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701-1512

Re: Finance Docket No. 33388 - CSX and Norfolk Southern - Control and
Acquisition - Conrail: National Historic Preservation Act, Section 106
Illinois SHPO Reference No. 12062497, 970107004P-S

Dear Ms. Haaker:

The purpose of this letter is to continue consultation with your office in accordance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing guidelines (36 CFR Part 800). This effort is being coordinated with preparation of an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA).

A copy of the Environmental Report (ER) submitted with the Railroad Control Application (RCA) was sent to your office by the railroads. The Section of Environmental Analysis (SEA) has received copies of the following letters from:

- January 14, 1997 requesting photos of standing structures in rail yards and intermodal facilities.
- January 29, 1997 stating requirement of Phase I archaeological survey at Exermont.
- February 4, 1997 stating no effect for rail line traffic increases.
- February 21, 1997 stating requirement of Phase I archaeological survey along abandonment from Paris to Danville.
- May 28, 1997 stating no effect for construction at Sidney.

- July 16, 1997 requesting map, description and photos of bridge at MP 144.59.
Indicates possibility of cultural resources near projects in Tolono and Kankakee.
Repeats request for Phase I archaeological survey at Exermont.

SEA and its independent historical consultants, together with a representative of CSX, met with your staff on August 5, 1997 to present the requested information and to review our identification of historic resources and our assessment of effects. A summary of this meeting was transmitted to Ms. Tracey Sculle of your staff on August 15, 1997. Two issues remain outstanding in the State of Illinois:

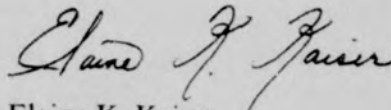
- The potential archaeological effects of the proposed railroad connection near the Cahokia Mounds historic site at Exermont in Caseyville.
- The potential effect on the interlocking tower at the CSX 75th Street Rail Yard in Chicago.

In accordance with the results of the August 5, 1997 consultation meeting, SEA has authorized a Phase I Archaeological Survey of the general alignment of the proposed Exermont Connection in Caseyville. This survey is being undertaken under the direction of Dr. John E. Kelly of the Central Mississippi Valley Archaeological Research Institute. As soon as preliminary results are available, we will contact you to arrange a consultation meeting for your review and input.

SEA has requested additional information from the railroad on the project that may affect the interlocking tower at the 75th Street Rail Yard. We are awaiting additional information from the railroad on this project to determine if it is part of the Conrail acquisition so that any potential historic resources can be identified and evaluated for a determination of effect.

SEA appreciates the assistance and cooperation of your staff and looks forward to continuing our Section 106 consultation as soon as the above information is developed. If you have any questions, please call SEA's cultural resources technical team leader for the Conrail acquisition, Barry Wharton of HDR Engineering, Inc., at (813) 287-1960 for assistance.

Sincerely,



Elaine K. Kaiser
Chief

Section of Environmental Analysis

cc: Paul McGinley, MHA
John Morton, HDR
William Novak, DCCO
Barry Wharton, HDR

STB

FD-33388

10-23-97

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Section of Environmental Analysis

October 23, 1997

Mr. J. Rodney Little
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place, Third Floor
Crownsville, MD 21032-2023

Re: Finance Docket No. 33388 - CSX and Norfolk Southern - Control and
Acquisition - Conrail: National Historic Preservation Act, Section 106;
Maryland SHPO Reference No. MD970114-0021

Dear Mr. Little:

On June 23, 1997, CSX Corporation and CSX Transportation, Inc. (CSX); Norfolk Southern Corporation, and Norfolk Southern Railway Company (NS); and Conrail Inc. and Consolidated Rail Corporation (Conrail) filed a consolidated Railroad Control Application (RCA) with the Surface Transportation Board (STB) under 49 U.S.C. 11323-25. CSX, NS and Conrail (collectively the Railroads) are jointly seeking authority for CSX and NS to acquire control of Conrail, and for the subsequent division of Conrail's assets (the Acquisition). The RCA is the action that formally initiates this proposed undertaking and our role as the Federal lead agency.

The purpose of this letter is to initiate consultation with your office in accordance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing guidelines (36 CFR Part 800). Consequently, the Section of Environmental Analysis (SEA) is seeking your comment regarding those projects within our jurisdiction that may have the potential to affect historic properties.¹ This effort is being coordinated with preparation of an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA).

¹ STB may impose conditions on rail line abandonments and new construction, but has limited jurisdiction over the acquisition-related activities. See 49 CFR Part 1105.8.

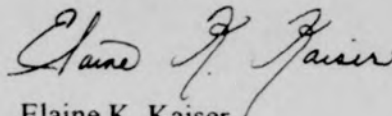
A copy of the Environmental Report (ER) submitted with the RCA was sent to your office by the railroads. SEA has received copies of the following letters from you:

- February 10, 1997, to Dames & Moore requesting detailed information and maps of all projects in the state and noting a wide variety of historic resources in the project areas.
- February 14, 1997, to Dames & Moore repeating comments of February 10, 1997.
- February 14, 1997, to Burns & McDonnell requesting detailed information and maps of all projects in the state and noting the possibility of a wide variety of historic resources in the project areas.

SEA's review of the ER indicates that acquisition-related activities in the State of Maryland are limited to two NS construction projects in Baltimore: (1) expansion of the Conrail Intermodal Facility and the construction of a new Triple Crown Services Facility on existing railroad property, and (2) construction of 800 feet of connecting track on existing railroad property at the NS/CR intersection in Hagerstown. The Baltimore project is unlikely to effect historic resources. SEA has determined that the Hagerstown project is located immediately adjacent to the **Hagerstown City Park Historic District**, which is a historic district listed in National Register of Historic Places, and on land previously used for railroad activity.

SEA has requested NS to clarify the above projects so that an area of potential effect can be established and a determination of effect on any potential historic resources can be defined. SEA looks forward to continuing our Section 106 consultation as soon as the above information can be developed. If you have any questions, please call SEA's cultural resources technical team leader for the acquisition, Barry Wharton of HDR Engineering, Inc., at (813) 287-1960 for assistance.

Sincerely yours,



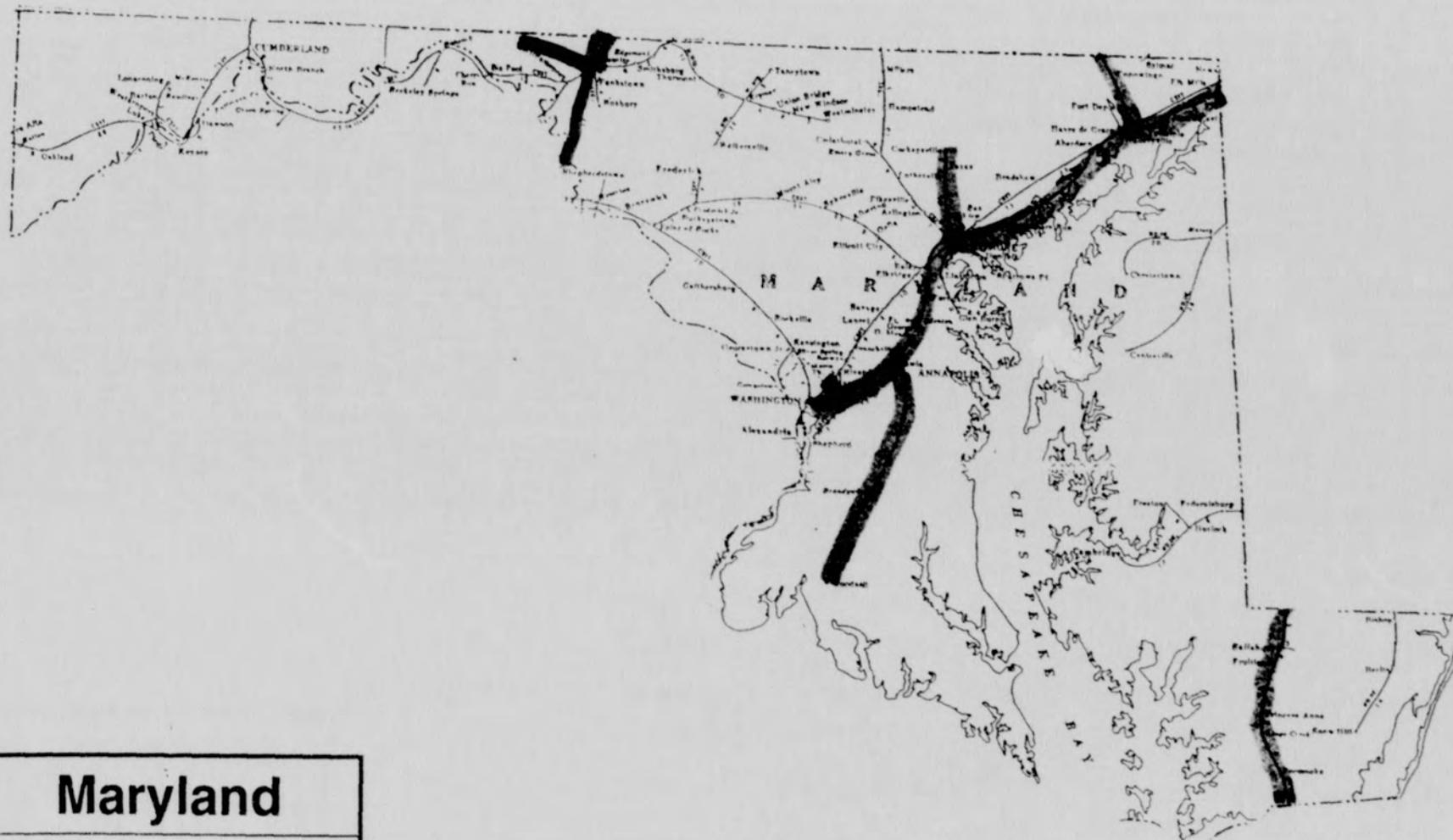
Elaine K. Kaiser

Chief

Section of Environmental Analysis

Enclosure: Maryland Railroad Map

cc: Paul McGinley, MHA
John Morton, HDR
William Novak, DCCO
Barry Wharton, HDR



Maryland

Conrail



CSX



NS



Acquisition Projects

