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October 5, 2004

Ms. Victoria Rutson, Chief
Section of Environmental Analysis
Room 504
Surface Transportation Board
1925 K Street, NW
Washington, DC 20006

Re: STB Finance Docket No. 34435, Ameren Energy Generating Co. - Construction and
Operation - Between Coffeen and Walshville, Illinois

Dear Section Chief Rutson:

American Resources Group, Ltd. ("ARG") was hired as a subcontractor to Dawkins Environmental Consulting, the third party contractor. ARG has completed a Phase I archaeological survey report that will be submitted to the Illinois Historic Preservation Agency by ARG as part of the Section 106 process. The survey report recommends that four sites along the routes undergo Phase II testing.¹ CWRC has been asked to review the four sites and determine whether the alignments could be changed to avoid these sites during construction. In consultation with Design Nine, Inc., an engineering railroad firm, CWRC provides the following reasons why it will not be able to avoid these sites by altering the alignment of the routes.

Site 11 MY 137 is located approximately between Station 304+50 and Station 305+50 on Route A. Site 11 MY 138 is located approximately between Station 292+50 and Station 295+00 on Route A. Site 11 MY 137 and site 11 MY 138 are interconnected as far as the railroad alignment is concerned because the sites are located on either side of Bearcat Creek. The best attempt to avoid the 11 MY 137 and 11 MY 138 sites would involve trying to slide the alignment further south which might minimize the impact to site 11 MY 137; however, because site 11 MY 138 is located on a knoll, an alternative alignment is not possible given the existing land contours

¹ The four sites are designated in ARG's report as 11 MY 137, 11 MY 138, 11 MY 141, and 11 MY 150.

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and grading needed and the fact that additional wetland impacts and adverse effects to MACTEC stream 15² would be created by a shifted alignment. This attempted alignment is not feasible.

Site 11 MY 141 is located approximately between Station 553+00 and Station 556+00 on Route A. The alignment bisects the site and any adjustment to the alignment in this area is difficult. The alignment in this area is affected by the combined crossing of the county road (CR 300) and Lake Fork Creek. A grade separated crossing has been proposed at this location because of the alignment needed to accommodate the crossing of Lake Fork Creek and CR 300. If the alignment is moved north, the crossing of Lake Fork Creek and CR 300 gets more complicated and the potential for wetland and safety impacts are increased. If the alignment is moved south, the crossing of CR 300 again is complicated and the property owner on the south side of CR 300 and west of Lake Fork Creek with existing farm facilities is negatively impacted. Neither attempted realignment is feasible.

Site 11 MY 150 is located approximately between Station 111+00 and Station 113+50 on Route B. No alternative alignments are feasible in this area because there are other structures and a cemetery which would be encroached upon by alternative alignments.

If you have any questions regarding this information, please do not hesitate to call me at (202) 274-2959.

Very truly yours,



Sandra L. Brown

cc: David Navecky
Glennon Hof
Carole Dawkins

² The number designation of this stream is from the wetlands report prepared by MACTEC Engineering and Consulting, Inc., dated August 27, 2004.