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City of Coos Bay

Office of the City Manager

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July 31, 2008

Section of Environmental Analysis
Surface Transportation Board
395 E St. SW
Washington, DC 20423

Re: Docket No. AB-515 (Sub-No. 2X), *Central Oregon & Pacific Railroad Inc. – Abandonment and Discontinuance – in Coos, Douglas, and Lane Counties, OR (Coquille to Vaughn)*

Section of Environmental Analysis:

In my role as the City Manager of Coos Bay, Oregon, I received, on June 30th, "Combined Environmental and Historic Report" of the Central Oregon & Pacific Railroad ("CORP") regarding CORP's planned abandonment of the rail line which passes through my City and is utilized by local companies.

The City of Coos Bay is a coastal city with a population of approximately 16,210 people and has resource based companies dependent on low cost transportation to remain competitive. I am concerned about the increased truck traffic that will result from the abandonment of the rail line. The Report notes that a total of 37,656 truck trips per year (18,828 full and 18,828 empty) will be created by the abandonment, with the great majority of these truck trips traveling through the center of Coos Bay on U.S. Route 101.

U.S. 101 is mostly a two lane undivided highway. The magnitude of this truck traffic increase would negatively impact the quality of life in Coos Bay because Route 101 is Main Street in Coos Bay. In fact, we have already seen an increase in truck traffic since the rail line has been shut down over the past nine months. On page 9, the Report states that the increase only represents 5 trucks per hour, but such a calculation is based on a 24-hour work day, six days per week. When using a more conventional 9-hour work and 5-day work week, the increase in truck traffic is over 16 trucks per hour. Additionally, the Report appears to disregard the traffic and other truck impacts by stating that the rail line is in a "rural area," but Route 101 travels directly through Coos Bay.

Bay. If CORP is allowed to abandon the rail line, I urge the Section of Environmental Analysis to look closely at the traffic, safety, noise, and air pollution impacts of this abandonment and impose conditions to mitigate this harm.

Second, as stated on page 13 CORP does not believe that their proposed action will adversely affect endangered or threatened species or areas designated as critical habitat. If CORP is permitted to abandon and remove the like, significant mitigation measures will be required because the rail line currently runs parallel to the Coos Bay Estuary which is the nursery to many fish species under federal listing as endangered or at risk.

Chinook salmon, Coho Salmon, and Steelhead Trout are just a few of the fish that can be found in the Coos Bay Estuary. Crucially, all three of these species are born in the river, and then spend their adulthood in the ocean before returning to spawn in the estuary. I am concerned that CORP has not properly addressed environmental concerns associated with the removal of the rail lines, in the vicinity of the estuary. Without proper environmental mitigation, this salvage activity could potentially destabilize the adjacent river and stream banks increasing the possibility of future erosion from the riverbanks and stream banks in the area. Increased sedimentation will damage the water quality and may deter salmon and trout from reaching the ocean and/or returning to spawn.

I am also concerned CORP's Report does not address the fact that the bridge removal process itself may result in contamination of the water from things such as bridge debris, paint, oils, or grease. As described on page 15 of the Report, I notice that CORP is planning no mitigation actions in connection with the planned abandonment. I urge the Section of Environmental Analysis to carefully consider the water quality impacts of CORP's plan to de-construct and salvage the rail line and the Umpqua River Bridge and impose appropriate mitigation to ameliorate the harm it would otherwise cause.

Thank you for this opportunity to participate in the abandonment proceeding. Please do not hesitate to contact me if you have any questions.

Sincerely,



Charles Freeman
City Manager

cc: Mayor McKeown and City Councilors
Terence M. Hynes, Council for CORP
Nate McClintock, City Attorney
Senator Verger
Port of Coos Bay