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08/21/2008 07:05 PM

To <christa.dean@stb.dot.gov>

cc "Brown, Sandra L." <Sandy.Brown@troutmansanders.com>

bcc

Subject Environmental Assessment; STB Docket No. AB-515
(Sub-No. 2)

EI-8726
CO

Dear Ms. Dean:

I reviewed the STB's Environmental Assessment for STB Docket No. AB-515 (Sub-No. 2) and have three observations to offer.

1. Regarding the bridges, was the U.S. Coast Guard asked to comment? At least four bridges cross navigable waters (three of these are major center swing span structures: specifically, the spans crossing the entrance to Coos Bay, Siuslaw River and Umpqua River). Hard to believe that the Coast Guard would not require these major structures to be removed as well as the former but now inoperable drawbridge at Coalbank Slough.

2. On page 4, the assessment says: "*The City of Oakridge was designated a PM non-attainment area in 1994, and last exceeded the standard in 1993. Both areas [Oakridge and Eugene, OR] currently meet the standard and are in the process of formally regaining attainment status.*" A footnote indicates the STB confirmed this with the EPA on August 5, 2008. Apparently things have changed because today's (August 21) newspapers carry an Associated Press story reporting that the U.S. Environmental Protection Agency has designated Oakridge (and Klamath Falls, OR) as out of compliance with tightened standards for airborne particles.

3. At the top of page 6 the EA reports that CORP states there are eight tunnels on the portion of the line that is proposed for abandonment. I believe the correct number of tunnels is nine, unless CORP plans not to abandon the first tunnel west of Eugene, which is Tunnel No. 13. Also, the EA does not mention what will become of the tunnels. Shouldn't the disposition of these structures be of some concern too?

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