

July 9, 2008

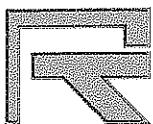
Mr. Keith Orris
Executive Director
Franklin & Marshall College
P.O. Box 3003
Lancaster, PA 17604-3003

**RE: COMMENTS ON PROPOSAL TO RELOCATE NORFOLK SOUTHERN
RAILYARD AND REMEDIATE THE LANCASTER COUNTY SOLID WASTE
MANAGEMENT DISPOSAL AREA
RT PROJECT #71384-01**

Dear Mr. Orris:

To follow up on the recent public forum, and in response to statements made at the forum, I am forwarding the following comments on behalf of TRRAAC and other parties:

- Unless significant further information is provided, statements made by Norfolk Southern and Franklin and Marshall College officials at the public meeting, as well as the June 12, 2008 letter prepared by Gannett Fleming and recently posted on the F&M Website provides confirmation that expansion of the existing railyard to the west, does not appear justified. The Gannett Fleming letter indicates that the Dillerville Road Bridge is a constriction, but any competent transportation engineer knows that the bridge can be rebuilt to accommodate in-place expansion and improvement of the existing railyard.
- Mr. Rudy Husband of the Norfolk Southern Railroad said that Gannett Fleming should be consulted for the calculation justifying the removal on the order 50,000 trucks per year from area highways. Gannett Fleming indicated to me prior to the meeting that they were not responsible for this calculation; rather, this calculation was prepared by the Lancaster County Planning officials. The College President, Mr. Fry repeated this project justification at the public meeting, but it is misleading. It is my understanding that the actual calculation is related to the potential amount of cargo that may be moved in boxcars given the increased *capacity* that is proposed to built. I have never heard that "*capacity* to be built" alone is justification for a major expenditure of federal funds, which in this case also involves large scale disruption of a landfill, on the order of 100,000 cubic yards of material.
- Justification for expansion of the railyard to the west is also not provided because Norfolk Southern has already been observed building trains, and making certain movements, which are claimed by Gannett Fleming to be justification for the need for the new railyard to the west. In all candor, it appears that Norfolk Southern has requested more improvements than those that may really be needed for the foreseeable future.
- TRRAAC has had an engineer rail expert comment on the situation. A recently constructed "cork track" has already been built which will double outbound train length. Although the need for closure of the lower "dead end" portion of the



Dillerville Railyard appears obvious, no objective justification has been provided as to why one or more bridges under Dillerville Road could not be reconstructed to provide needed movements, and the existing rail line right-of-ways to the east and west could be utilized to assemble trains along with a rebuilt railyard. He recommends that one could review the feasibility of providing NS capacity requirements by locating all capacity at the existing yard by eliminating or reconfiguring the Dillerville Road overpass and using the space north of the NS Main.

The format for the public forum did not allow me adequate time to ask questions, on behalf of TRRAAC, Manheim Township, Lancaster Township, and East Hempfield Township. In my opinion, a proper public meeting under Act 2 Public Involvement Program is still needed. As you stated during the public meeting, written information in terms of the actual reports was not available prior to the Public Meeting.

Additional questions for which responses are requested include:

- Will the detention basins proposed in the plans be lined, so as to be able to contain a sudden spill?
- Will there be written Federal and State PPC and SPCC Contingency and Emergency Response Plans prepared for the new Railyard and in effect before any new rail facilities open?
- As low level groundwater contamination will remain at the proposed site due to historic groundwater impacts, has Norfolk Southern agreed that if future rail yard operations exacerbate impacted groundwater contamination, that they would be responsible for any further needed groundwater cleanup?
- When and where will NEPA environmental documents be publicly available?
- What will be the procedure for submitting comments on the NEPA documents and how long will the public comment period be open?
- Can a map be produced that shows rail crossing closing durations and frequencies, currently, and projected for the future?
- Is excavation of 100,000 cubic yards of waste considered an avoidable impact for NEPA purposes, and will they be described as such in the NEPA environmental documents? As your consultant has confirmed that the waste could be fully addressed from an environmental standpoint by capping, and closure in-place, and as there apparently is existing exposed asbestos containing material at landfills on both sides of the creek, has the Lancaster County Solid Waste Management Authority agreed to properly cover and maintain the final cover in both landfill areas, regardless of whether or not the rail yard expansion is built?

- Who has determined that Vermont Avenue is suitable for carrying 70 trucks per day? (This roadway has a minimal width, has utility poles within the cartway, and the road has apparently been expanded by Franklin Marshall College for athletic field parking. Further, the roadway from the end of Vermont Avenue to what will apparently be a railroad crossing to the remediation area does not appear to be paved.) Will the roadways be improved, and poles moved in the paved portion of Vermont Avenue, or will truck traffic be limited to one way during the project? If so, what guarantee is there that trucks will not back up on the Harrisburg Pike, as trucks tend to travel in bunches, on projects such as this?
- Will Vermont Avenue, and the roadway extension be properly upgraded and/or widened before the start of the work?
- Will there be decontamination areas and 100% wheel washing for trucks leaving the site, as crushed asbestos containing material tiles or flooring is considered friable asbestos?
- Has the railroad made specific date commitments as to when the latest low emission diesel locomotive technology will be deployed at the Dillerville Railyard?

It is our belief that public confidence is being lost on the project because credible information is not technically available, specifically, on the need for the railyard expansion to the west. The recent Gannett Fleming letter dated June 12, 2008 indicates that an adequate evaluation of alternatives by a competent transportation engineer has simply not been completed. We would recommend that an independent engineer review the statements made by Gannett Fleming, Norfolk Southern, and Lancaster County Planning, as observation of train movements at the rail yard, and misleading statements made about removing trucks from highways, (which is really only a back calculation from future capacity), is causing opposition to the project.

Finally, the summary information provided on the poster board on the historic preservation resources review does not meet typical minimum requirements to allow the public to review and comment upon the adequacy of the work provided. No details on the extent of research provided were shown on the poster board.

We recommend that the project be delayed until complete and objective information for the railyard expansion to the west is provided, and once full information and all reports are at hand, a follow up public meeting can be held, and then, final decisions can be made based on real information, with reasonable alternatives not dismissed "out of hand".

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Thank you for the opportunity to comment.

Very truly yours,

RT ENVIRONMENTAL SERVICES, INC.



Gary R. Brown, P.E.
President

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