



# Oregon

Theodore R. Kulongoski, Governor

E1-12775 CD

## Department of Transportation

Region 3

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September 15, 2008

FILE CODE:

SURFACE TRANSPORTATION BOARD  
WASHINGTON, DC 20423

Re: STB DOCKET NO. AB-515 (Sub-No. 2) Central Oregon & Pacific Railroad, Inc. –  
Abandonment and Discontinuance of Service - In Coos, Douglas, and Lane Counties, OR

Dear Board Members,

Please accept these comments on behalf of the Oregon Department of Transportation in reference to the proposed abandonment and discontinuance of rail service in Coos, Douglas, and Lane counties.

We are concerned for the traffic impacts resulting from increased truck traffic in downtown Coos Bay and North Bend. US 101 through these downtowns is already congested and experiences unstable traffic flows at peak times. The sudden addition of trucks has further degraded traffic operations within these communities and should be analyzed further.

The EA identifies Average Daily Traffic (ADT) at the Lane/Douglas County line as 4000. We note that this number could increase at least 25% during the summer peak travel and possibly as high as 37%. These numbers are based on Automatic Traffic Recorders (ATRs) along US 101. Truck volumes prior to rail service discontinuation were estimated to be 8.5% of the total volume. An extra 159 trucks would raise that to between 12 and 13%.

The study's "area highways" in the EA were limited to US 101 and OR 126. This works if one assumes the average beginning point for each loaded truck trip is Coos Bay. Since 95% of the trips haul forest products, and some of the mills are as far away as Coquille, other highways are impacted in addition to US 101 and OR 126. One such highway is OR 42. The impacts on OR 42 should be addressed in the EA.

For example, we assume Roseburg Forest Products (the largest rail customer on the Coos Bay Line) sends forest products to their Roseburg rail head which is in the 65-70 mile range via OR 42 as opposed to 135 mile range if the trip begins in the Coquille area. A significant increase in trucks on OR 42 will likely have an effect on key intersections in the Winston area and on motorists traveling to and from the coast. OR 42 has very few passing lanes and increases in truck traffic can be expected to impede more of the higher speed cars and cause queuing. Following slower trucks sometimes leads to underestimating risk taking values and underestimating distances in passing situations.

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Another item not adequately addressed are the shipments to and from American Bridge in Gardiner. That company periodically ships bridge girders that cannot fit under highway bridges on any of the routes between I-5 and the coast. Oversize loads are important to address when assessing the impacts from discontinuing rail service.

A lack of rail service will continue to have a dramatic effect on transportation to and from our southern coast. If you have any questions, please contact me at 541-957-3658.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Paul Mather', with a long horizontal stroke extending to the right.

Paul Mather, P.E.  
ODOT Region 3 Manager

Cc: Doug Tindall  
Chris Warner  
Kelly Taylor