



MISSOURI FARM BUREAU FEDERATION

P.O. Box 658, 701 South Country Club Drive, Jefferson City, MO 65102 / (573) 893-1400

December 29, 2014

Ms. Diana Wood
Surface Transportation Board, Case Control Unit
395 E Street, SW
Washington, D.C. 20423

RE: Docket No. AB 1068 (Sub-No. 3X) Missouri Central Railroad Company—Abandonment and Discontinuance of Service Exemption—in Cass, Pettis, Benton, Morgan, Miller, Cole, Osage, Maries, Gasconade, and Franklin Counties, Missouri; and Docket No. AB 1070 (Sub-No. 3X) Central Midland Railway Company—Discontinuance of Service and Operating Rights Exemption—in Cass, Pettis, Benton, Morgan, Miller, Cole, Osage, Maries, Gasconade, and Franklin Counties, Missouri

Dear Ms. Wood:

On behalf of Missouri Farm Bureau, the state's largest general farm organization, I submit the following comments regarding the Environmental Assessment (Decision ID 44129) pertaining to the docket referenced above.

We submit for the Board's consideration the fact that prime farmland acreage adjoining the rail corridor could be significantly adversely impacted by the proposed abandonment and post-abandonment activities. According to information compiled by the Missouri Natural Resources Conservation Service, acreage designated as "prime farmland" or "prime if drained" adjoins sections of the corridor.

In comments submitted previously (Decision ID 237260 and 237261), we noted that if the corridor were converted to a recreational trail, many farms and ranches would be adversely impacted. Our concerns encompass not only the impact on prime farmland but on other productive farmland, including pasture operations. In addition to risks relative to access to the corridor and biosecurity, we are concerned that adjoining farmland will be adversely impacted by activities associated with salvage activities and trail construction and maintenance. If new access points are installed to accommodate salvage activities, increased farmland acreage could be adversely affected and more farming operations could be disrupted. Moreover, increased exposure to trespass and other unauthorized entry poses long-term risk to adjoining farms and ranches.

The Environmental Assessment notes the lack of input from several federal, state and local agencies, most notably, the U.S. Army Corps of Engineers, U.S. Environmental Protection

Agency, U.S. Department of Agriculture's Natural Resource Conservation Service, and U.S. Fish and Wildlife Service. Conditions recommended by the Office of Environmental Analysis to be imposed on any decision granting abandonment authority reflect potentially significant matters as yet unaddressed by these agencies as noted in the "Environmental Review" and "Historic Review" sections of the Assessment.

We again urge the Surface Transportation Board to ensure that the matters identified in the Assessment on which information is lacking be addressed before the exemption becomes effective and interim trail use is authorized. If a stay is not granted, we request that neither a Public Use Condition nor Interim Trail Use Condition be issued until the matters referenced previously are addressed.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Hurst". The signature is fluid and cursive, with the first name "Blake" and the last name "Hurst" clearly distinguishable.

Blake Hurst
President