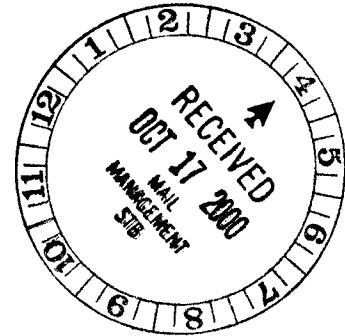


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October 10, 2000

Office of the Secretary
Case Control Unit
STB Finance Docket No. 33407
Surface Transportation Board
1925 K St. NW
Washington DC 20423-0001



Attn: Victoria Rutson
Environmental Project Manager
Environmental Filing

Dear Ms. Rutson:

I read with interest the Executive Summary of the Draft Environmental Impact Statement, Finance Docket 33407, regarding the proposed expansion into the Powder River Basin, of the DME Railroad Corporation. I previously wrote two letters to the STB stating my concerns on July 3, 1998, and March 11, 1999, which are attached. After carefully reading the Executive Summary I do not feel that the concern that I previously raised about public safety has been adequately addressed in the Impact Statement.

Section ES.8.1 (no-Action Alternative A) contains the only substantive discussion of public safety in the Executive Summary. This section paraphrases statements regarding safety made by DM&E. I was surprised that no other independent sources or public safety experts had been consulted for this report. I find the statement from DM&E that it would likely continue to have a poor accident record, and that the safety of existing road crossings would continue to deteriorate (unless the expansion were approved) to be very troubling. Statements such as these from a railroad company should raise serious concerns about their current and past business priorities regarding public safety, and any future plans that they propose. I believe that this should be more thoroughly evaluated prior to any decision regarding railway expansion.

Specifically, in section ES.9.3.2 (Rochester Alternatives) I do not see any indication that safety experts were consulted, or that a public safety comparison of the three Rochester alternatives, R-1 (No Action), R-2 (Reconstruction of the existing rail line), and R-3/R-4 (Bypass Alternatives), was conducted. I would like to see an independent projection of public safety data comparing these three alternatives for projected train/vehicle accidents (number, severity, deaths) and derailments (number, severity, deaths) and other public safety issues. I would like to see existing data from other similar U.S. communities with similar rail lines. I find it difficult to believe the implication from DM&E that an increased number of high speed coal trains on upgraded track through downtown Rochester will be safer than a limited number of low speed trains on existing track or a bypass route. This requires further study.

I continue to support alternatives R-1 and R-3/R-4. I am opposed to R-2.

Sincerely,

JW Charboneau, MD

J. William Charboneau, MD
500 20th Street NE
Rochester, MN 55906