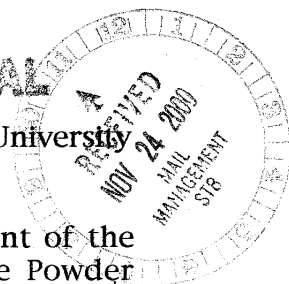


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I wish to comment on just the Biological Assessment of the Draft Environmental Impact Statement prepared for the Powder River Basin Expansion Project.

Minnesota is blessed with an amazingly rich diversity of living organisms which consists of over 1800 vascular plants, 600 invertebrates and literally thousands of invertebrate animals and non vascular plants. Despite this rich diversity, this study chose to discuss the possible impact of this project on just 20 species which have Federal status as Endangered, Threatened or are potential candidates for Federal Status. Does this mean that the other Minnesota species are irrelevant? I think not. Minnesota biologist, Harrison Tordoff, has reminded us " that extinction of species, the silent crisis of our time, diminishes our world."

Minnesota has a painful history of losing species by exploitation of the environment, and it is imperative that we not repeat the mistakes of the past. In retrospect, who would have thought at the time of Minnesota statehood, that the Carolina parakeet, heath hen and passenger pigeon would be annihilated in less that a half century? Who among the early naturalists would have thought that the whooping crane, long-billed curlew, McCown's longspur and several other species would be completely gone from Minnesota by 1900? Who could have guessed that ginseng, *Panax quinquefolia*, a plant that inhabited Minnesota woods by the millions would become commercially extinct and survive only in limited numbers in isolated pockets in Southern Minnesota?

In 1981, the Minnesota legislature mandated the Department of Natural Resources to prepare a list of Minnesota plants and animals whose populations were in jeopardy. An expert advisory committee selected over 300 species for this list and each species was placed in a defined category of *endangered*, *threatened* or *special concern* as mandated by Minnesota Statute 84.0895

The purpose of this list was not only to help preserve the diversity and abundance of plant and animal species in the State, but also to alert biologists of potential problems here in Minnesota before problems became paramount at the federal level. What is interesting about the draft environmental impact statement is that there is only a limited discussion concerning possible impact on Minnesota's *endangered*, *threatened* and *special concern* species. Also missing from the draft EIS is any mention of the most important book ever published on Minnesota diversity and biology. Failure to include the

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1988 book, "Minnesota's Endangered Flora and Fauna", edited by Barbara Coffin and Lee Pfannmuller clearly indicates that the draft EIS is flawed and incomplete. This book contains county distribution maps for Minnesota species considered to be *endangered*, *threatened* or *special concern* and the reasons why they are listed. Since the rail expansion project proposes to traverse counties where some of these species are located, it is imperative that we know if this project may impact their existence.

Due to time constraints, a detailed compilation of Minnesota *endangered*, *threatened* and *special status* species for each county in the proposed rail expansion project was not completed, but I did prepare a list for Blue Earth county. Appendix A-B lists the common name, scientific name and special status category for each species.

In the plant category in Blue Earth County, 2 species are *endangered*, 5 *threatened* and 11 are of *special concern*. In the animal category, 1 species is *threatened* and 6 are of *special concern*.

How will Minnesota's *threatened*, *endangered* and *special concern* species be impacted by the proposed rail expansion? Answer: we do not know because most of them were not included in the draft EIS.

To illustrate why this draft EIS is incomplete let me demonstrate why additional study is needed by focusing on just two plants that may possibly survive in the proposed rail corridor.

The only known location of the lichen, *Leptogium apaachense* in the entire state of Minnesota is from Blue Earth Co. This lichen has not been recollected since 1890 and may be extinct, but the authors of "Minnesota's Endangered Flora and Fauna" believe it may still survive along the Minnesota River.

Eared Gerardia, *Agalinis auriculata*, is known from only 3 counties in Minnesota. It was last seen in Dodge County in 1956, Blue Earth County in 1960 and in Nicollet County in 1892. This species may be extinct from all of these counties, but the authors of "Minnesota's Endangered Flora and Fauna" believe "there are suitable habitats scattered in the Minnesota River Valley..... that have not been adequately searched."

A few years ago, the former Prime Minister of Norway, Gro Brundtland, suggested that we must pursue intergenerational equity solidarity in our management plan for the planet. Resource use should not be avoided, but only on a scale that will leave room for future generations. She employs us to "consider our planet on loan from our children, rather than being a gift from our ancestors." We owe it to our children to make every effort to preserve Minnesota's biological diversity. This proposed rail expansion project is not

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important enough to totally ignore Minnesota's *threatened*, *endangered* and *special concern* species.

When 22% of all plant and animal species in the United States are considered threatened or endangered, it is irresponsible to consider approving a major rail project which traverses hundreds of miles and yet considers only the possible impact on just 20 species with Federal Status.

The draft EIS is incomplete and does not present sufficient evidence to support either the Mankato route or the Southern Bypass. Clearly, the most environmentally preferred alternative would be the No-Action Alternative. The application presented by DM&E based on information presented in the Biological Assessment, should not be approved.

References:

Coffin, Barbara and Lee Pfannmuller (Editors) 1988. *Minnesota's Endangered Flora and Fauna*. University of Minnesota Press, Minneapolis. 473 pp.

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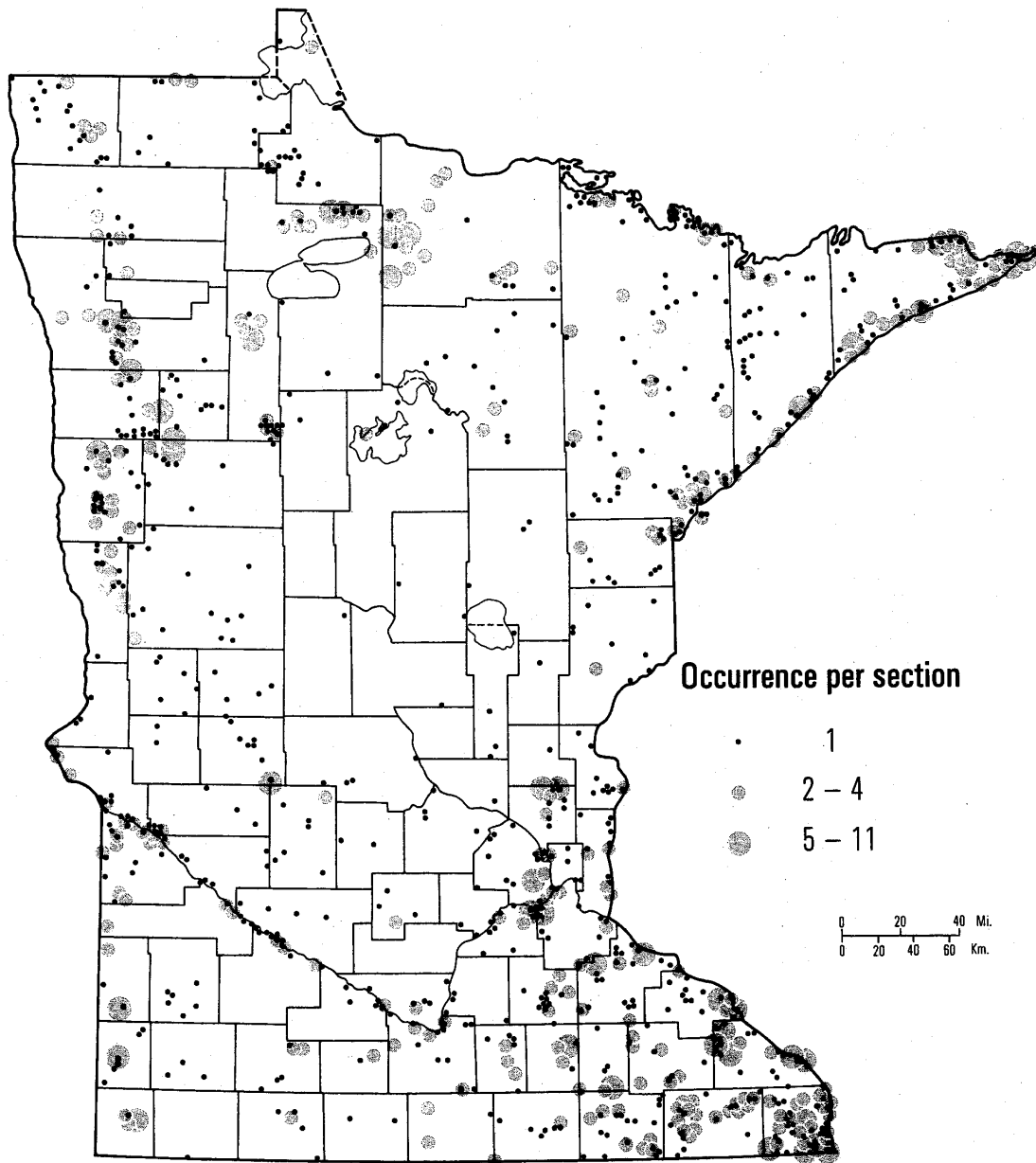
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Sierk, H. A. 1964. *The Genus Leptogonium in North America North of Mexico*. The Bryologist 67:245-317.

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Distribution of Minnesota Endangered, Threatened or Special Concern Plant Species

Source: Barbara Coffin and Lee Pfannmuller (editors) 1988.
Minnesota's Endangered Flora and Fauna. University of Minnesota
Press, Minneapolis. 473 pp.

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Appendix A

Blue Earth County Plants	Status
<i>Agalis auriculata</i> ; Eared Gerardia	endangered
<i>Aristida longiseta</i> ; Red Threeawn	special concern
<i>Asclepias sullivantii</i> ; Sullivant's Milkweed	threatened
<i>Cacalia plantaginea</i> ; Tuberous Indian-plantain	threatened
<i>Cypripedium candidum</i> ; Small white Lady's slipper	special concern
<i>Desmanthus illinoensis</i> ; Prairie Mimosa	special concern
<i>Dryopteris goldiana</i> ; Goldie's Fern	special concern
<i>Eryngium yuccifolium</i> ; Rattlesnake -master	special concern
<i>Leptogium apalachense</i> ; lichen	endangered
<i>Lycopodium porophilum</i>	threatened
<i>Opuntia macrorhiza</i> ; Plain's prickly pear	special concern
<i>Panax quinquefolium</i>	special concern
<i>Rhynchospora capiillacea</i> ; Hair-like Beak-rush	threatened
<i>Rudbeckia triloba</i> ; Three-lobed Coneflower	special concern
<i>Sanicula canadensis</i> ; Canadian Black snakeroot	special concern
<i>Scleria verticillata</i> ; whorled Nut-Rush	threatened
<i>Triglochin palustris</i> ; Marsh Arrow-grass	special concern
<i>Trillium nivale</i> ; Snow Trillium	special concern

Appendix B

Blue Earth County Animals	status
Birds	
<i>Lamius ludovicianus</i> ; Loggerhead Shrike	threatened
<i>Rallus elegans</i> ; King Rail	special concern
Mammals	
<i>Spilogale putorius</i> ; Eastern spotted skunk	special concern
Amphibians and Reptiles	
<i>Elaphe vulpina</i> ; Fox snake	special concern
<i>Lampropeltis triangulum</i> ; Milk snake	special concern
<i>Pituophis melanoleucus</i> ; Gopher snake	special concern
Fish	
<i>Scaphirhynchus platyrhynchus</i> ;	special concern
Shovelnose sturgeon	