

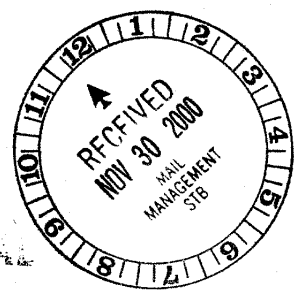
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November 22, 2000

Office of the Secretary
Case Control Unit
STB Finance Docket No. 33407
Surface Transportation Board
1925 K Street, NW
Washington D.C. 20423-0001

**ENVIRONMENTAL
DOCUMENT**



Attention: Victoria Rutson
Environmental Project Manager

The Brookings County Farm Bureau again wishes to express our support for the DM&E Powder River Basin Project and recognizes the many advantages an upgraded rail infrastructure will provide. At the same time we strongly oppose a bypass of the City of Brookings as outlined in the DEIS as Alternatives B-3 and B-4 and support Alternative B-2.

As agricultural producers, one of our most common frustrations with the current conditions of the DM&E track is its inability to carry fully loaded cars or to travel at a reasonable rate of speed. This prevents local grain elevators from being able to quickly move grain and forces them to either refuse grain until they have room or to pile it on the ground, risking losses in quality to the elements and ultimately slowing harvest progress for producers.

We agree with the SEA conclusion that B-3 would prevent Brookings shippers from realizing this improvement and essentially limit all DM&E customers from utilizing full weight and speed advantages. Furthermore, B-4 would eliminate all service to local shippers, which negates the benefits of the overall project. We have doubts that highway infrastructure can support the 400 semi-trucks needed to replace the service of every train that is denied access to 7 local customers.

Brookings County Farm Bureau believes that this region should have efficient transportation to commodity markets in the Pacific Northwest. Other regions have the opportunity to meet export needs served by the Gulf of Mexico and Great Lakes ports. This access gives the upper Midwest the opportunity to supply Asian and Pacific Rim markets, for the first time, with large volumes of specialty grains and high quality grains and byproducts.

One of the original purposes of the overall project is to improve track quality and install better safety devices at track crossings. Alternative B-3 dictates that the City of Brookings will continue to have the deteriorated track with unimproved crossings posing the same safety problems year after year. We note that an act of vandalism that caused a major derailment within the city would likely have been prevented had the technology of a Class 1 Railroad been installed.

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We understand that the DM&E has offered to develop B-2 to achieve a level of safety above and beyond the industry standard for similar situations, which city officials have refused to accept. The City of Brookings has not offered to incorporate this level of safety with B-3 and B-4.

Farm Bureau notes that B-3 and B-4 places a rail line that separates Brookings from 12 or more rural housing developments or towns that commuters travel from daily. The route also travels through areas containing many small rural acreages, livestock and horse operations, and irrigated land. Consequently, a new rail line bisecting these types of operations creates unforeseen and extremely challenging circumstances by crossing many small fenced paddocks and grazing areas, and eliminating the ability to use center pivot irrigation. Many of the farm fields that are crossed are sized and shaped to accommodate degree of slope and available natural or man-made drainage. Farming these fields becomes very difficult for some distance beyond the right of way.

Additionally, several commercial and home-based business are within and near the proposed B-3 and B-4 routes. Farm Bureau notes that for all of these situations, the perceived problems of noise, vibration, pollution, and quality of life issues are just as much a factor for people along B-3 and B-4 as they are for people along B-2. Therefore, there is not an improvement in nuisance mitigation by shifting the problem onto others.

Farm Bureau wishes to contest the possible assumption by the City of Brookings that future industrial development will be encouraged along B-3 and B-4. Only a very small portion of this total area has been designated for future growth. The majority of this land is within the established flood plain and has been determined unfit for most development that could utilize a railroad. We encourage the SEA to re-evaluate the environmental effects of B-3 and B-4 versus B-2. We do not believe those environmental effects can be mitigated as adequately as was previously assumed.

Finally, Brookings County Farm Bureau is extremely critical of the process, or lack of process, with which B-3 and B-4 were developed by the city of Brookings. Many, if not all affected landowners first found out that a mile or more of new track would go across their land by reading it in the local newspaper. This is not typical of the forthright protocol the DM&E has demonstrated with other landowners and that citizens expect in the United States.

For these reasons, we encourage the STB to maintain the established 90 day comment period without an extension and to grant DM&E approval of their application and give explicit direction that Alternatives B-3 and B-4 be eliminated and preference be given to Alternative B-2.

Sincerely,



Brookings County Farm Bureau
Jim Gilkerson, President
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CC: Senator Tom Daschle
Senator Tim Johnson
Representative John Thune
Kevin Schieffer, DM&E