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1730 North Second Street
Mankato, MN 56001

November 30, 2000

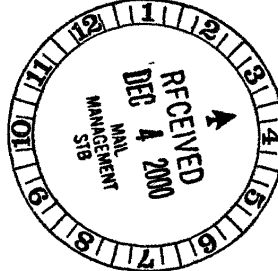
Office of the Secretary
Case Control Unit
STB Finance Docket No. 33407
Surface Transportation Board
1935 K St., NW
Washington DC 20423-0001

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507-388-6134



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Dear Ms. Rutson,

Two weeks ago I was elected to the City Council of Mankato to represent the people living in Ward 2. This ward is bisected by the proposed M-3 or thru city route. Needless to say, the proposed expansion of the DM&E railroad was a very hot topic.

After reading the Draft Environmental Impact Statement, several thoughts came to mind:

The Executive Summary, page 14, Section ES-4 states: "According to DM&E it is unlikely to upgrade its existing line because a "no action alternative" would not provide the financial resources needed to reconstruct its existing system." Question: Why did not the D.I.S. consider the Federal Railroad Rehabilitation and Improvement Financing Program (RRIF) for the DM&E upgrade? This fund has 3.5 billion dollars available at government subsidized interest rates to allow the DM&E to make necessary improvements without the coal hauling train.

The Executive Summary, page 47, Section E3-9 states: "Due to years of deferred maintenance, much of the existing DM&E railroad system is in poor condition, allowing speed restrictions of 5 mph on rails over 100 years old"! Question: Where are all the profits from the railroad from the last 100 years and why didn't the railroad take care of its tracks? They were given the land and ran the business into the ground with poor business practices and now want the public to bail them out with a hair-brained scheme to haul coal.

In addressing more local concerns the DIS has no specific information on the impact of 37 coal trains to the City of Mankato Flood Control Project. The failure of this wall during a high water period could cause millions of dollars of damage and possible loss of life and yet this fact has been largely ignored in the draft EIS. The study has covered Bald Eagles, Bob and Sturgeon

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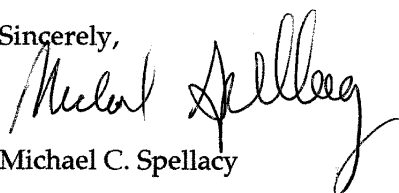
chubs but neglects the lives of human beings in Mankato. The residents and businesses in my ward, along with the rest of the City of Mankato, need the protection of the flood wall to survive during high water and the DIS has done no testing or analysis to this point.

The second major local concern is the impact the noise and vibration will have. In my best estimate there are over 5,000 people living within 6 blocks of the proposed M-3 route in both Mankato and North Mankato. According to the DIS, Chapter 3, Pages 3.3-4.3 there are 229 houses located within 500 feet of the proposed M-3 route. Many of these homes are owned by lower to moderate income residents. Running 37 unit coal trains through their neighborhood at up to 50 miles per hour, 7 days a week, 24 hours a day would make their lives a living hell. Their property would become worthless and their life savings obliterated.

In conclusion, the only correct choice you can make is to deny this project. There is no need for a third rail carrier to haul an 18th century fuel 1000 miles to outdated power plant. Should the DM&E want to upgrade its trackage there are federal programs such as the "Federal Railroad Rehabilitation and Improvement Financing Program to assist with the project. A recent study done by North Dakota State University for the US Department of Transportation concluded that "Class I railroads are natural monopolies over a fixed network size and that duplicate service of the Class I rail network would result in excess resource costs".

The worst possible choice would be the M-3 thru city route. With the issues of the flood wall integrity, noise and vibration to over 5,000 residents and unanswered safety questions, the M-3 route can not be considered a viable choice for this area. As stated in Table 3.3-10 in Chapter 2 of the DIS, there are 105 daily school bus crossings to contend with on the M-3 route. These are problems that mitigation cannot solve and therefore I ask that the M-3 option be abandoned.

Sincerely,


Michael C. Spellacy