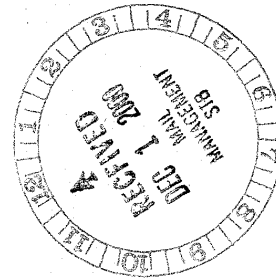


MANKATO AREA COAL TRAIN COALITION
P. O. BOX 106
MANKATO, MN 56001

NOVEMBER 27, 2000

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ENVIRONMENTAL DOCUMENT

Mr. Timothy Fell
U.S. Army Corps of Engineers
St. Paul District
190 Fifth Street East
St. Paul, MN 55101-1638

Re: STB Docket #33407
Powder River Basin Project - DM&E Railway
DM&E Section 404 Permit Application
Flood Control Project - Mankato, Minnesota

Dear Sir:

The Mankato Area Coal Train Coalition agrees with the DEIS (9/27/00) that the Mankato in-city route (Alternative M-3) is not the environmentally preferred route, and our position is that it must never become the environmentally preferred route. However, the Mankato Area Coal Train Coalition is deeply concerned about the integrity of the Mankato Flood Control Project if the STB were later to approve the M-3 route for DM&E Expansion.

Our position is that the DEIS (9/27/00) is inadequate and incomplete because no rigorous and comprehensive testing of the Flood Control Project (as requested in our letter of June 15, 2000, to the STB and to all cooperating agencies) was done and, therefore, no test results for public comment are presented in the DEIS. A new draft EIS including comprehensive test results should be compiled and opened for public comment, and we request that this be done.

Mankato suffered two major floods prior to the building of the Flood Control Project, and the people are well aware of the personal and economic devastation which resulted. In addition, twice within the past ten years water has risen to the top of the flood wall. Citizens of Mankato are justifiably concerned at the prospect of the projected increased train traffic near and on the flood control project. It seems to most of us that prudence would require that anything which could even remotely have the possibility of jeopardizing the flood control project should be denied.

We ask you to consider carefully the following points:

- (1) The railroad tracks projected to be rebuilt in the in-city corridor are only a few feet from the flood wall in Downtown Mankato and are actually on top of the levee in South Bend Township (LeHillier). The entire downtown from the Minnesota River to Fourth Street is in the flood plain, as is the LeHillier area. It is our understanding that the flood control project was originally designed to accommodate the train traffic at time of design. (The project was transferred from the COE to the City of Mankato in 1983.)

Page 2
Mr. Timothy Fell
STB Docket #33407
Flood Control Project - Mankato, MN
November 27, 2000

It is unclear if the flood wall could now withstand the increased number and frequency and weight of the DM&E-projected thirty-seven 100-car coal trains per day plus increased Union Pacific traffic. Over a period of time, repetitive loading and vibrations from passing trains, possibly two trains meeting and passing each other, as well as the extra weight from trains sitting on sidings, all within a few feet of the flood wall or on top of the levee, may adversely affect the flood wall and/or levee. Such adverse effects, together with possible saturation and liquefaction of the base during high water or flood stage, may cause the flood wall and/or levee to fail. The base of the floodwall is seventy feet deep and made up of soils which are known to be low-N and of erratic manmade fill with a low shear modulus.

(2) Problems which may develop from unforeseen circumstances are also of concern. Even if it might appear that there is no present threat to the integrity of the flood wall, one cannot anticipate every possible threat or circumstance. For example, experts who viewed the situation at Grand Forks, N.D., thought that the flood control project could withstand the recent flood, and it did not. Anything which might contribute to such an outcome at Mankato should be denied.

(3) Another aspect of this unique situation is that possible adverse effects to the integrity of the flood control project would affect only the Mankato side of the river, since there are no railroad tracks near the floodwall across the river on the North Mankato side. If the Mankato floodwall/levee were to be adversely affected by the increased train traffic, and if the Mankato flood project were to fail, Mankato would possibly be subject to a higher volume of water than might be expected, because if the North Mankato flood wall held then Mankato would receive the full force and volume of the flooding.

(4) The City of Mankato owns, operates, and maintains the Flood Control Project under the technical advice of the Corps of Engineers. If the M-3 route were approved by the STB and the COE, projected increased train traffic may result in costly added maintenance in the future. The question arises as to whether the city would have to bear the expense of added maintenance and repair or would the COE be responsible. Also, emergency payments from FEMA, if the flood control project were deficient at the time of a flood, should not be jeopardized, if the STB and COE have given approval to the M-3 route.

(5) It is our understanding that the DM&E must prove that there would be no adverse effects to the flood control project. We request that a thorough and comprehensive study of possible effects be made. This should include complete and accurate information from the DM&E as to the design of the project for the in-city route. To date the City of Mankato officials seem to be uncertain as to the proposed design. The study should include rigorous and comprehensive on-site testing in accordance with the highest

Page 3

Mr. Timothy Fell

STB Docket #33407

Flood Control Project - Mankato, MN

November 27, 2000

engineering standards in regard to vibration and the possible effects of vibration on the entire flood control project which may result from the increased number, frequency, and weight of the projected DM&E traffic per day. It must also consider the worst-case scenario of unbalanced wheels, flat spots on wheels, irregular rail bed, and other variables. In addition, projected increased Union Pacific traffic must be included in the study.

(6) It is also important that these tests and the analyses thereof are not just for one pass of the train. The solution needs to address what happens over long periods of time with hundreds and thousands of repeated trains passing.

(7) Both testing and analyses should also take into account the climatic extremes of temperature and precipitation to which Mankato is subject. Temperatures vary from well over 100° F. to colder than -40° F. The temperature and moisture content of soil at time of testing can have a significant impact on the tests and must be taken into consideration. The extremes of temperature and precipitation throughout the year must also be used in analyzing the potential possible impact of increased train traffic on the flood wall.

(8) The prospect of DM&E expansion using the in-city corridor (M-3) immediately adjacent to and/or on top of the Mankato Flood Control Project is of great concern to Mankato citizens. We urge that no consideration of approval of the M-3 route ever be given until a new draft EIS is compiled which includes comprehensive on-site testing of the possible impact of the DM&E expansion on the Mankato Flood Control Project. The new draft EIS should then have a new public comment period, so that test results are open to public scrutiny and public comment.

Thank you very much for your consideration of this extremely important situation.

Sincerely,

MANKATO AREA COAL TRAIN COALITION

Nancy A. Hamer
Dick Liebendorfer

Nancy A. Hamer

Dick Liebendorfer, Co-Chairs

cc: Please see next page (Page 4) for list of seven (7) agencies receiving copies of this letter. Thank you.

Page 4

Mr. Timothy Fell
STB Docket #33407
Flood Control Project - Mankato, MN
November 27, 2000

cc:

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