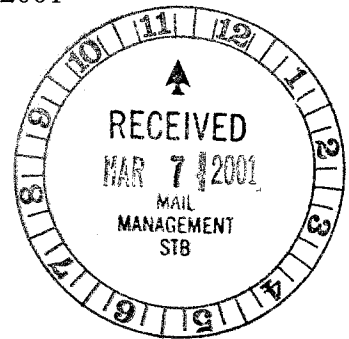


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Office of the Secretary
 Case Control Unit
 STB Finance Docket No 33407
 Surface Transportation Board
 1925 K Street, NW
 Washington, DC 20423-0001

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Attention: Victoria Rutson
 Environmental Project Manager
 Environmental Filing (202) 565-1545

My name is Leslie Hammack and I live in a residentially zoned neighborhood of Brookings adjacent to the existing DM&E rail line. My home is located 175 feet from the tracks, and I have previously argued for the 'No Action Alternative'. For reasons already detailed in my previous correspondence with the STB, I still believe that no action is the best alternative given the myriad adverse impacts of the DM&E project and the limited positive outcomes. Should the project proceed, however, I favor Alternative B-4, the bypass for all rail traffic at Brookings, as it would at least minimize the number of negatively impacted 'sensitive receptors' in this area. The shorter 8.5-mile bypass submitted this month by the city of Brookings would be equally acceptable, at least from the standpoint of minimizing impacts in Brookings.

I have not previously commented on noise or vibration sections of the DEIS and wish to address these issues here as they are both of considerable concern given my proximity to the existing line. Sections of the DEIS dealing with both of these topics are difficult to decipher and do little to allay my concerns. SEA concluded on pg. 4.3-62 of the draft DEIS that "ground vibration could be sufficient to cause structural damage to buildings located within 100 feet of the rail (Appendix F)". It further stated that "beyond 100 feet, ground vibration would be expected to lessen to a magnitude that would not result in structural damage" but that "between 101 and 200 feet, ground vibration could be of sufficient magnitude to cause concern that structural damage would occur". My home is located in the 100-200 foot zone, and my concern about structural damage would be lessened considerably if Appendix F presented any hard data to support the above suppositions.

On pg. 4.4-80 section 4.4.9.2, the DEIS states that "ground vibrations are highly dependent on specific soil conditions....., which are highly variable. The magnitude of these vibrations would be dependent on the size and types of trains, operating weight of these trains, and the characteristics and types of soils adjacent to the rail line." Appendix F (p. 12) identifies rail straightness as another important factor, indicating "that wayside ground vibration is directly related to rail straightness". Nevertheless, pg. 1 of Appendix F indicates that the DEIS "report is limited to a general evaluation of the potential impacts that may occur, rather than a site specific analysis because of a lack of detailed information concerning soils, propagation characteristics, and structure types. No sites were visited as part of this vibration study." Several examples are discussed in Appendix F, but these either provide data at lower speeds than the 45-49 mph proposed for the DM&E project and/or fail to report car weight, train length or soil conditions. There is no way to use these examples to predict likely vibration impacts of the DM&E upgrade. Even Appendix F indicates on p. 11 that the examples "are not substitutes for data collected at specific sites that might be affected by the DM&E upgrade and introduction of unit coal

trains", even though it then proceeds to use these data to predict vibration (pg. 21). Another glaring oversight is failure to evaluate effects of heavier rail cars, considering that DM&E plans to change to 286,000-lb rail cars at start-up and to accommodate 315,000-lb cars. And, what mechanisms will be in place to insure procurement of any necessary straight rail if, as indicated on pg. 31 of Appendix F, "such rail is difficult to obtain in the United States"? That a major U.S. rail manufacturer (L. B. Foster, i.e., Natmaya, Inc.) holds a large share of DM&E common stocks only increases this concern. Appendix F concludes with a recommendation that "measurements of existing ground vibration produced by DM&E freight trains should be conducted to establish the severity and significance of ground vibration at sensitive receivers". It would also be appropriate to obtain measurements from unit coal trains running under conditions approximating those proposed for the DM&E project. These are the kinds of data that needed to be included in the DEIS *before* its release for public comment.

The conclusion reached in Appendix F that noise exposures on the new and rebuilt line would be lower than currently experienced is highly questionable. The discussion of locomotive noise levels assumes that the same locomotive throttle setting (throttle 8, Table F-4) that is necessary to pull a small number of light-weight, low-speed cars (41-62 presumably 268,000-lb cars) would adequately power many heavy higher-speed cars (up to 135 286,000- to 315,000-lb cars). No justification for this dubious assumption, given on pg. F-9 of Section F.3.3, is offered.

Omitting any effect of rail car weight in Equation 5 on the value of SEL_{car} (F-7) requires more justification than the statement offered on pg. F-10 that rail car noise measurements made in an earlier case showed no differences among coal, merchandize and intermodal trains. Did these measurements include a range of car weights from 268,000 to 315,000 lbs? Did the study compare empty and full coal cars, which clearly differ? Readers need considerably better information about the measurement conditions used in this study to evaluate their relevance to the current set of situations.

The numbers of existing trains appear to be exaggerated in Tables F-5 and FA-1, at least in the Brookings area. This has the effect of exaggerating existing train noise levels. Certainly the figure of 3 to 3.75 overnight trains is incorrect (FA-1). Maybe these figures would pass if such vehicles as the pickup trucks following freight trains were counted, but that would have the effect of equating noise from these vehicles with that from unit coal trains, clearly invalid. And how can one additional train running from Brookings to Tracy in the future (10 now and 11 in the future according to Table F-5) carry 20 million tons (presumably of coal)? The columns in these tables need to be more clearly labeled or their content corrected.

A few minor corrections follow:

- Appendix F, pg. 4. This equation needs to be corrected to appropriately label each orthogonal axis.
- p. 3.2-63, footnote 10. There is no Section 3.3.3.7.2 (should probably read 3.3.2.7.2).
- Appendix F graphs. The y-axis labels are unclear; only dBA and dBV are defined. What is dB RE?

At this point, I can only conclude that time constraints and political pressures led to premature publication of the DEIS. It is not yet sufficiently complete or polished to justify release and public comment.

Thank you for considering my comments.



Leslie Hammack