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Mankato, MN 56001
February 2001



Office of the Secretary
Case Control Unit
STB Finance Docket #33407
Surface Transportation Board
1925 K Street NW
Washington, D.C. 20423-0001

Attn: Victoria Rutson
Environmental Project Mgr.

RE: Comments on the DM & E Railroad DEIS

At the public hearing held in North Mankato, it was stated that the STB could move on this project in three ways: Deny, Approve with Mitigation, or Approve.

These comments urge denial of project. There are already two rail lines running to the Powder River Basin. Articles have been written indicating that a third line would lower the cost of getting the coal from the basin to our area because there would be more competition. This is a poor reason. There are two different existing rail lines and there seems to be no competition between them. If charges are based on costs as they should be, there would be an additional rail line charging the same amount.

Other speakers at the hearing quoted a savings in milage traveled for the coal trains. This project could give them a savings in milage, but at what expense to our heritage and our cattle ranges and our citizens?

The area in Wyoming where this project is slated is rich in archeological treasures that would be destroyed. The DM & E Railroad has already destroyed some of these treasures in Minnesota. The railroad does not care about our heritage. In the name of replacing a bridge, they destroyed a site that had been preserved and had hosted digs over the years. This site was by Cambria, Minnesota. Now that site is gone. It cannot be replaced. It cannot be mitigated. This is true with the Wyoming site. No amount of mitigation can replace it. Once it is destroyed, it will be gone forever.

When you look at the next area, there are few homes that will be destroyed, but the cattle on the grazing range will be shut off from their watering holes and will be more apt to be killed on the railroad tracks.

You might be able to mitigate this by putting the railroad on a trestle so the cattle can pass under it and get to their water and not be run over by a train. We have very few areas of grazing land left. It should not be destroyed by a coal train.

Comments have been made that there is no dust from the coal train because of the kind of coal that they are hauling. Upon questioning, it seems that the dust is all supposed to blow off before it reaches the Minnesota area. How does coal dust affect the cattle and the meat we eat? In the populated areas, respiratory problems can be documented from the coal dust. A requirement for a canvas covering on coal cars could mitigate the loss of coal dust as the cars cross the country. It probably wouldn't stop all of the dust, but it would hold some in. Apparently, they have a giant vacuum to clean the coal cars at the power plant. Why would they need this if there is no dust?

Many of the coal-fired power plants were grandfathered in when the clean air act was implemented. As these plants are updated (scrubbers are expensive, but may be required) or closed down, the amount of coal that will be needed in our area will decrease. As to the economics of coal-burning plants, evidence has been given to show that twice as much coal from the Powder River Basin is needed to gain the same heat. If they need to burn twice as much, is there really a savings in the sulfur emissions?

The DEIS lists mine prices for the coal. The DEIS has a date of September 2000, why are the mine prices only given for 1997? Many changes have occurred in the two years. Where there had been little demand for the coal from the Powder River Basin previously, this has suddenly changed. Under the principle of supply and demand, when the demand increases, the price will also increase. To consider the mine price of coal, you will need a current price. A price from three years back is not satisfactory. As an example of changes in this time period; my first acre was tax valued at \$4400 in 1997, and in 2000, it was \$27,000. A lot of change takes place in three years. The mine prices given in the DEIS are inaccurate and should not be taken into consideration.

Let's summarize the reasons this permit should be denied.

- 1) Competition between rail lines does not exist at the present time and no proof has been given that a third line will make a difference in this area.
- 2) It will destroy historic areas that cannot be replaced.
- 3) It will destroy our cattle grazing area.
- 4) It may cause respiratory problems for our citizens and who knows what to the meat we eat.
- 5) The economics of burning this coal as compared to the higher sulfur coal from other areas do not seem as important when they need to burn twice as much.
- 6) The mine prices given in the DEIS are so outdated that they should not be taken into consideration.

DENIAL OF THE PERMIT IS URGED!

The Mankato area, County of Blue Earth, Minnesota specifically:

The DM & E railroad has proposed a rail yard just West of Mankato adjacent to the existing Minneopa State Park. What they did not take into consideration is the fact that our Minnesota state legislature had given approval for the state park to expand its boundaries to the West and this rail yard would be located within the park itself. The DEIS speaks of the noise levels, etc. that are associated with a rail yard and these comments will not repeat that. The fact that this is located in a valley should also be considered because the air currents are different in a valley than they are on top of a hill. In the summer, when the air is heavy, the fumes and everything else that is emitted into the air is going to remain there until a rain washes it out. These two items should be seriously considered concerning this project:

- 1) The rail yard should not be located in a valley.
- 2) The rail yard should not be located in Minneopa State Park.

THE PERMIT SHOULD BE DENIED BECAUSE OF THE LOCATION OF THE RAIL YARD.

The existing DM&E rail line runs through Minneopa State Park. The addition of 37 coal trains on this line could have devastating effects on a state park because of the noise and the vibration.

THE PERMIT SHOULD BE DENIED BECAUSE AN ADDITIONAL 37 COAL TRAINS WILL RUIN OUR MINNEOPA STATE PARK.

In terms of our local area, there are two routes for Mankato. One goes through town and the other goes south of town. Each will be covered separately.

The one through Mankato would go alongside existing track of the Union Pacific Railroad. Mr. Schieffer, President of DM&E, has stated that this is an existing line and if the railroad goes this route, they will not have to buy out residents that are even within 100 feet of the track. If it's a new line, then they go out 150 feet and purchase property. Steve Soley's house is 100 feet from the present track. When these homes were built originally, train traffic was minimal. DM&E is proposing an additional 37 loaded coal trains in this permit.

In Wilson, Ihrig & Associates, Inc. Acoustical Consultant's report in the DEIS, it is stated on page 5, paragraph 2:

The Federal Transit Administration also recommends an rms vibration velocity limit of 4,000 micro-in/sec, or 72 dBV, for frequent events occurring more than 70 times per day. For less frequent events, the FTA recommended criterion is raised to 10,000 micor-in/sec, or 80 dBV. However, the less frequent events covered by the FTA are short commuter trains or rail transit trains, rather than long freight or unit trains.

The table on Page 6 gives this along with dBV's for offices, waiting rooms, schools, churches - 78, Commercial -84, and workshops, industrial -90.

The Example given on page 11 from Kamloops, BC is probably most appropriate to the Mankato area and I quote:

Significant vibration occurred in Kamloops, BC, after worn gag-pressed rail was replaced with new roller-straightened continuous welded rail over one of two parallel tracks. Introduction of unit trains consisting of coal hopper cars was met with vigorous community reaction and concern over building damage. The vibration due to trains operating on the new track was significantly higher than due to trains operating on older adjacent track.

One-third octave ground vibration spectra for various train speeds are plotted in Figures 2 and 3 for distances of about 100 and 200 feet (30 and 60 meter) from the track. In these examples, the frequencies of the peaks in the 1/3 octave band spectra increase from 4 Hz to 10 Hz as the train speed increases from 20 to 40 mph. A narrowband analysis of recorded analog data (not shown here) indicated that the spectral peak was related to the roller pitch diameter of the factor, however, was the soil, which responded readily to vibration forces.

The levels of vibration recorded at both 100 and 200 feet from the track were very much in excess of the criteria discussed above for residential use and greatly in excess of criteria for a variety of industrial processes. While these levels can be considered extreme, they could occur at any railroad passing over soft alluvial soils, such as might be encountered in river bottom-land, with undulating rail and unit trains.

The line through Mankato is in river bottom land. In fact, a portion of the existing UP rail line in South Bend Township is built on the dike. The DM&E along with the Union Pacific Railroad are both using the new welded rail.

Both railroads state that there is less vibration and noise with the new welded rail. According to the study in the DEIS, just the opposite is true. Steve Soley's house, 100 feet from the track in river bottom-land would be in excess of the criteria discussed for residential use. Yet Steve's house would not be purchased or relocated because this is an existing line.

The study only went out to 200 feet. How many more feet would be included where the residential level of vibration is in excess?

The residents who live in the area of excess vibration deserve to be considered when you issue this permit. Since the study only goes out 200 feet, you don't even know how far to mitigate in terms of excess vibration.

THE PERMIT SHOULD BE DENIED BECAUSE OF THE EFFECT THE GROUND VIBRATION WILL HAVE ON RESIDENTS.

There are industrial businesses that are located along the route. Nothing has been investigated as to what specific equipment they use. All of them may be effected by this vibration.

THE PERMIT SHOULD BE DENIED BECAUSE OF THE EFFECT THE GROUND VIBRATION WILL HAVE ON BUSINESSES.

There are two historical structures along the route through Mankato. The depot which Mankato has documented in their comments and the Chapman house is South Bend Township. A picture of this house is included on the next page.

THE PERMIT SHOULD BE DENIED BECAUSE OF THE EFFECT THE GROUND VIBRATION WILL HAVE ON HISTORICAL STRUCTURES.

The study on ground vibration has no information on what vibration will do to the Mankato flood wall and the South Bend Township dike. Also the South Bend Township well is located within 100 feet of the existing track. What effect will ground vibration have on the township well? The Mankato Flood Wall is mentioned on page 26 where it says, "This discussion is particularly relevant to the Mankato Flood Wall".

THE PERMIT SHOULD BE DENIED BECAUSE OF THE EFFECT THE GROUND VIBRATION WILL HAVE ON FLOOD CONTROL STRUCTURES AND THE SOUTH BEND TOWNSHIP WELL.

The Hillcrest Nursing Home is located right next to the track of the proposed south route around Mankato. The Hillcrest Nursing Home is a 110 bed home. The Mankato Lutheran Home is located between the railroad tracks and the river of the route through Mankato. The Mankato Lutheran Home is a 68 bed nursing home and has two assisted living units in addition.

THE PERMIT SHOULD BE DENIED BECAUSE OF THE EFFECT THE GROUND VIBRATION WILL HAVE ON ADJACENT NURSING HOMES.



John Cross photo

Historical places

This is one of a series of photos of historical places in Blue Earth County.

Charles Chapman House

The Charles Chapman House (418 McCauley St., LeHillier, South Bend Township), built in 1858, is one of the earliest and best preserved stone structures in the area. Chapman, an engineer/

surveyor, not only laid out the townsite of LeHillier in the vicinity of his house, but was responsible for surveying town lots for many of the early additions to Mankato as well as for other early townsites in the area. Mr. and Mrs. Clayton Young now live in the house.

From APPENDIX F- NOISE ANALYSIS, paragraph F.1 DEFINITION OF RAILROAD NOISE.

The principal sources of noise SEA considered in evaluation of rail line segments are wayside noise and horn related operational noise adjacent to the right-of-way, excluding warning horn noise. Wayside noise results from steel train wheels contacting steel rails and from locomotive exhaust and engine noise. The amount of noise created by the wheels on the rails is dependent on the train speed, and the amount of noise created by the locomotive is vicinity of highway/rail at-grade crossings to warn motorists and pedestrians of approaching trains.

On page F-17, it says: "The Federal Aviation Administration (FAA) considers values above 65dBA (annual average) unacceptable for residences, schools, churches, and hospitals".

The news reports that a 70dBA is in effect for rail lines and may be raised because of the use of cell phones and loud stereos where people do not hear train warnings.

If a 65dBA is unacceptable airplane noise, why shouldn't the same standards apply for rail lines?

Again from page F-17, the last paragraph states:

In the evaluation of DM&E's rail system, it was assumed that all three projected load levels (20 MNT, 50 MNT, and 100 MNT) meet the SEA noise evaluation criteria (65 dBA Ldn and a 3 DBA increase in noise levels) and have to be considered for mitigation. For the 20 MNT load, the increase in noise may not meet the criteria, but was included due to the unknown effect of local traffic changes after the new rail line is operational. Clearly, the 50 MNT and 100 MNT levels will meet the SEA noise evaluation criteria.

Table FA-7 shows the projected future noise levels for 37 trains/day and 7400 feet length train. The hearings have mentioned 100-car trains. Since this is the longest one given in the table and not knowing the length of coal cars plus the number of engines required to pull the train, this table is being used for these comments. Mankato is located in the Walnut Grove to Waseca line segment and when we follow this across, we find that the distance to 65 DBA L drift without horn is 435 feet. When you add a horn, the distance increases significantly. There is only one mitigation when you are speaking of someone's home and that is to purchase the property so they can relocate. Purchase of property only within 150 feet of a new line will not suffice where this line goes through Mankato and South Bend Township.

THE PERMIT SHOULD BE DENIED BECAUSE MANY HOMES WILL BE WITHIN THE 435 FEET OF THE RAIL LINE.

THE PERMIT SHOULD BE DENIED BECAUSE THE HILLCREST NURSING HOME IS LOCATED WITHIN 50 FEET OF THE RAIL LINE.

The other alternative at Mankato is a southern bypass of the City of Mankato along Blue Earth County Road 90.

To get to this route, Mr. Forsberg, Blue Earth County Engineer, states the DM&E line will go under the UP line and use the old railroad bed in (LeHillier) South Bend Township. At a public meeting, Mr. Forsberg indicated the DM&E line would dig down 60 feet so they could go under the UP line and Highway 169/60. The photo from the 404 permit of this area is included. The topography is not real clear in this photo as highway 169/60 go up hill while the rail lines are down next to the river. The photo is on the following page. The first white structure in the right side of the picture is the Hillcrest Nursing Home.

If you go down 60 feet or even 20 feet to run the DM&E under the UP rail line, you will be below the water level and the track will be covered with water. In addition, you would be cutting through the dike and South Bend Township (LeHillier) would be losing its flood control dike.

THE PERMIT SHOULD BE DENIED BECAUSE IT WILL DESTROY THE DIKE FOR SOUTH BEND TOWNSHIP RESIDENTS.

Map follows picture. After it crosses the Blue Earth River and runs parallel to the river, it will eliminate several homes in the incorporated Village of Skyline. This is a small village and the loss of this much of its tax base will create possibly the loss of the village itself. It will also create a hillside that already has some slidage problems into a large problem.

THE PERMIT SHOULD BE DENIED BECAUSE IT WILL DESTROY THE VILLAGE OF SKYLINE.

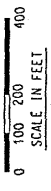
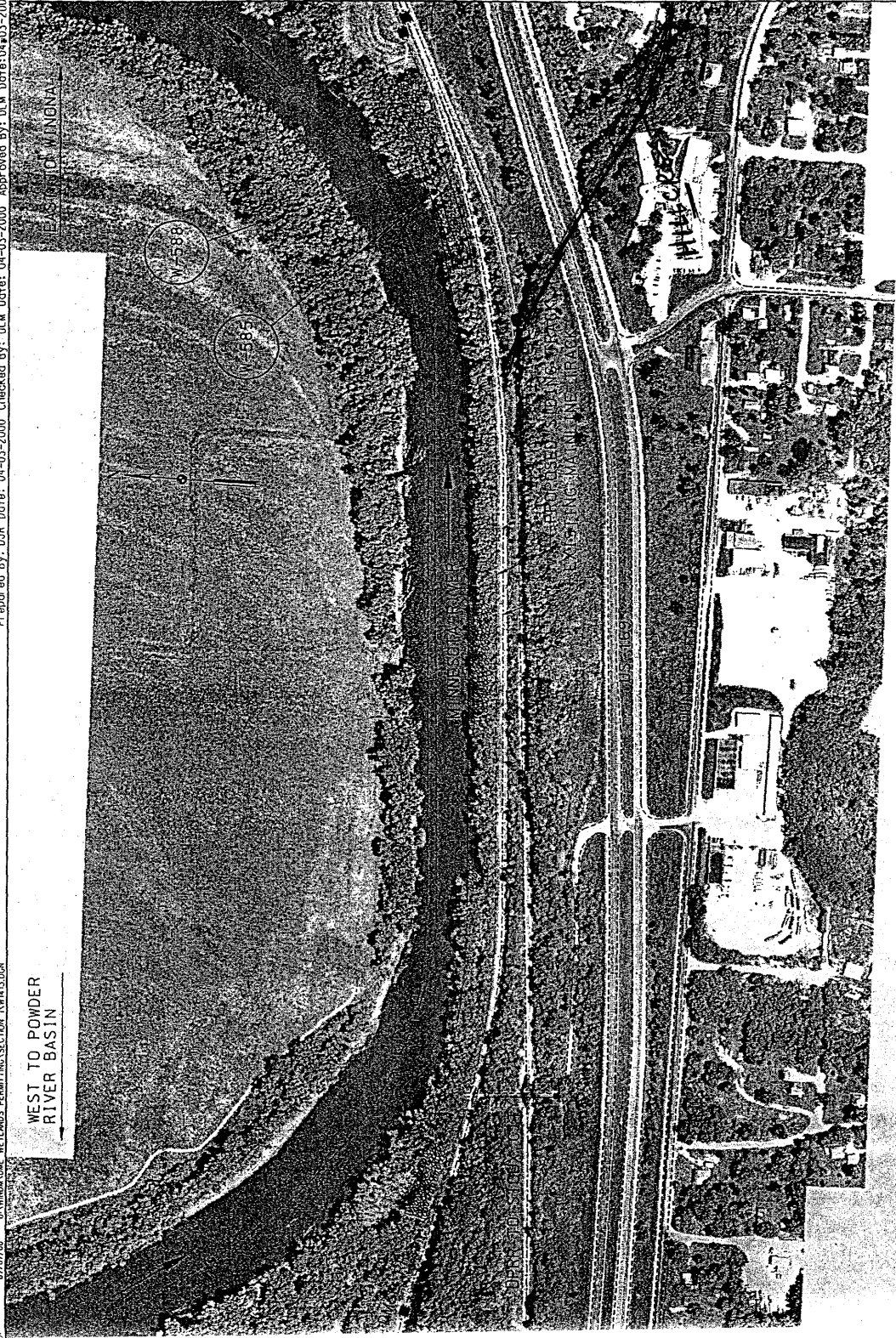
THE PERMIT SHOULD BE DENIED BECAUSE IT WILL CREATE AN EROSION PROBLEM THAT WILL END UP IN THE BLUE EARTH RIVER.

As we follow the rail line past Skyline and along Hwy 66, it is hard to tell exactly what will be impacted. However, Mr. Forsberg, after speaking with the DM&E, told us that Mt. Kato will be impacted.

This is interesting because in Vol. 2 Section 3.2.18 Recreation, it states:

A wide variety of recreational opportunities are available within the project area as discussed in Sect 3.1.16. Although a wide variety of opportunities are available, these opportunities are only capable of accommodating small numbers of people at any given time. Many of these opportunities such as hunting, fishing, camping, snowmobiling, and hiking are outdoor oriented and are not restricted to the immediate vicinity of the rail line.

07/07/00 01 WINDOGE WETLANDS PERMITTING SECTION INW413.DGN
Prepared By: DJR Date: 04-03-2000 Checked By: DLM Date: 04-03-2000 Approved By: DLM Date: 04-03-2000



SCALE IN FEET



POWDER RIVER BASIN
EXPANSION PROJECT

404 PERMIT EXHIBIT			
BANK STABILIZATION 141.3			
State: MINNESOTA	Twp/Range: T108N, R27W		
County: BLUE EARTH	Section: 16		

Mount Kato



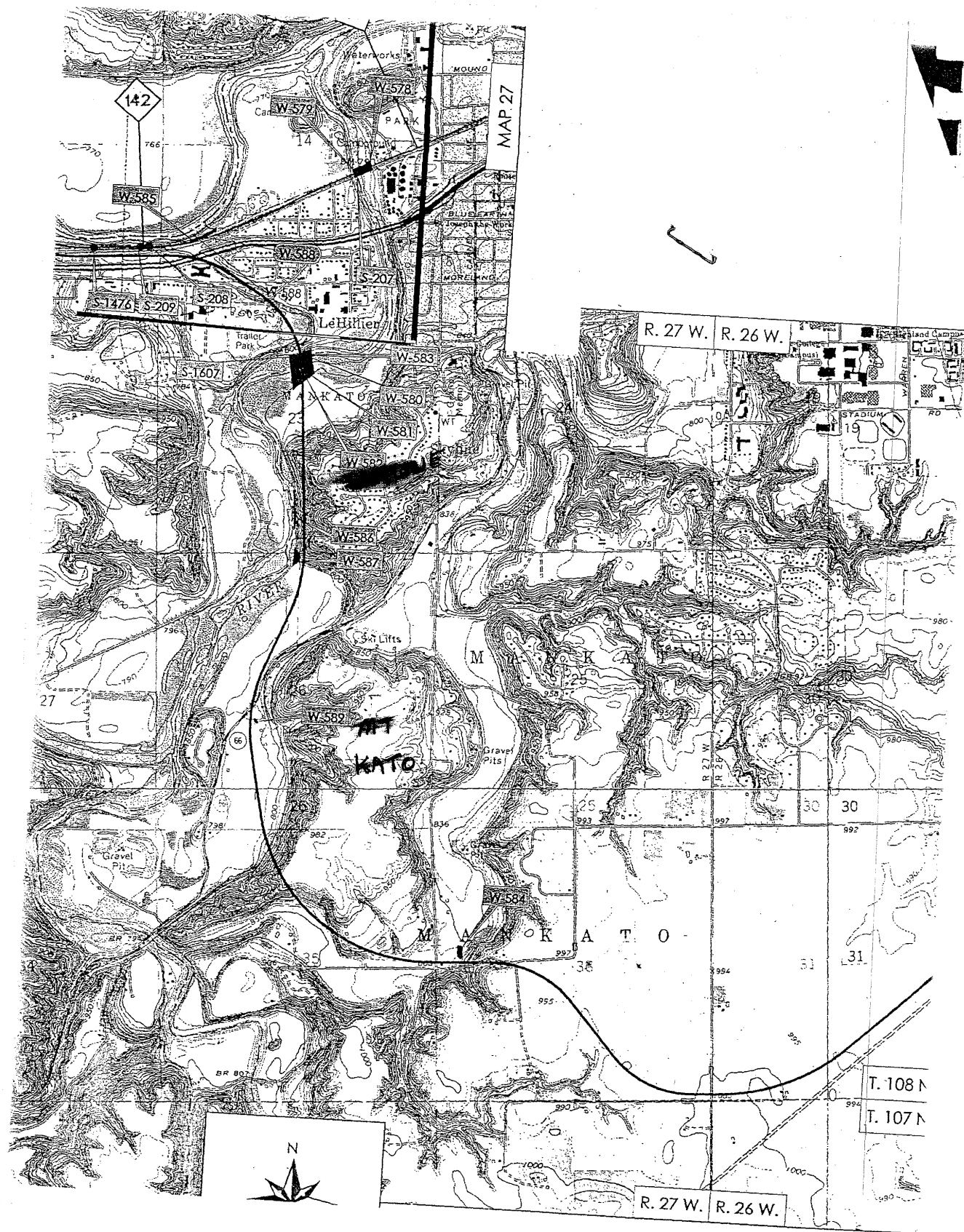
2000-2001

1-507-625-3363

1-800-668-5286

www.mountkato.com

MANKATO, MINNESOTA



What about Mt. Kato?? This is our only ski facility in Southern Minnesota. This facility has had over 2000 people there in a day. The DEIS completely missed this recreational facility. This is restricted to the immediate vicinity of the rail line and is very important both economically and recreationally to our area and the surrounding area.

Buses come from adjacent states: Wisconsin, Iowa, South Dakota, North Dakota and Nebraska to ski here because this is the closest for them. If the DM&E line impacts the South ski slope, the entire facility will close. On February 16, 2001, they hosted nine separate groups with six buses from one group. In no way can it be construed that it is small numbers of people who use this facility.

THE PERMIT SHOULD BE DENIED BECAUSE IT WILL CLOSE OUR ONLY SKI FACILITY IN SOUTHERN MINNESOTA.

The DM&E rail line will impact both the Red Jacket hiking trail and the hiking trail along Blue Earth County's hwy 90. The rail line will take out parts of one or both of these trails. These are restricted to the immediate vicinity of the rail line and many bitter battles were fought to put these trails into existence.

THE PERMIT SHOULD BE DENIED BECAUSE IT WILL IMPACT OUR ONLY TWO PUBLIC HIKING/BIKING TRAILS SOUTH OF MANKATO.

Respectfully submitted,

Sharon Schaller

Sharon Schaller
Resident, South Bend Township,
Blue Earth County, Minnesota