

12/5/01 FAX to Attn: Victoria Rutson, STB, 1-202-565-9000.
Hard copy to follow. Thanks, Nancy Hamer

December 5, 2001

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

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

Attn: Victoria Rutson
Environmental Project Manager
Environment Filing

Re: DM&E Expansion Project - Mankato, MN
FEIS, Chapter 7
FEIS, Appendix M, p.39-53, 61-76

Dear Ms. Rutson:

As a matter of public record, we are writing to comment on the above FEIS:

1. Testing done for the Mankato Flood Control Project is inadequate. It does not meet the criteria of the Corps of Engineers. FEIS states: "No direct criteria for evaluating the flood wall vibration relative to damage were obtained. . . . The nature of the wall and its foundation suggest that these criteria may not be directly applicable, though the criteria might provide an indication of the possible significance of the vibration." p.M-40 It appears that no soil borings were obtained. Subsurface testing was apparently addressed using only assumptions regarding composition or compaction. It appears that little if any testing was completed at the Blue Earth River crossing.

The SEA makes a blanket statement in the FEIS, p.7-9, that the flood project will not be negatively impacted. We believe that the SEA does not have final review authority of impacts to the flood control project and their recommendation to the STB should not be used as a basis for any decision that may affect the flood project. The United States Corps of Engineers is the only reviewing authority that can make a finding regarding any potential impact to the flood control project.

2. No testing of the Mankato Flood Control Project had been completed at the time of the publication of the Draft Environmental Impact Statement. The testing referred to in the FEIS is new information. This information should now be scrutinized by the public and there should be a public comment period in this regard; otherwise there is no review process.



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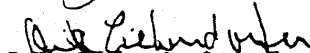
We believe that the Final Decision of the STB must include a requirement for a resolution to flood control project testing before the Alternative M-3 may be considered a feasible alternate to Alternative M-2.

Thank you very much.

Sincerely,

Mankato Area Coal TRain Coalition


Nancy Hamer


Dick Liebendorfer, Co-Chairs

cc:
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