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Brotherton Seed Co., Inc.

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PEA SEED

September 14, 2009

Ms. Christa Dean, Attorney, Section of Environmental Analysis
Surface Transportation Board
US Department of Transportation
Patriots Plaza
395 E Street, SW, Room 1108
Washington, DC 20423-0001

Dear Ms. Dean,

I'm writing to represent three established businesses in Moses Lake, Washington, which will be affected by the design and construction of the Northern Columbia Basin Railroad Project: Brotherton Seed Company, Moses Lake Iron & Metal and Ferrell Gas.

STB Finance Docket No. 34936 (Sub-No. 1), page 4, paragraph 4 states that, "According to the Port and CBRW, no shipper will lose service as a result of the proposed transactions. Rather, the proposed transactions will improve service to existing shippers and provide an opportunity for prospective shippers who could benefit from rail service to move onto the line in areas already designated for industrial development." However, according to the plans of the Project, the section of railroad that is currently used by Brotherton Seed Company, Moses Lake Iron & Metal and Ferrell Gas is scheduled to be abandoned.

Brotherton Seed Company, Moses Lake Iron & Metal and Ferrell Gas have strong ties to our community established over several decades at our current locations. With an annual turnover in excess of \$10,000,000, we ship our various products by rail in about 100 cars every year.

The proposed rail line abandonment would severely cripple, or perhaps destroy, our businesses. As the price of diesel increases, the alternative of truck transport becomes a growing economic hardship with environmental, safety and regulatory issues. Abandonment of this rail line would force Ferrell Gas to receive their products by trucks and this would add at least 110 more trucks per year, carrying hazardous materials over the road and throughout the town of Moses Lake. Brotherton Seed Co. and Moses Lake Iron & Metal could not survive without rail service and would be forced to shut down or relocate.

The Columbia Basin Railroad, in conjunction with the Port of Moses Lake, Grant County Economic Development, The City of Moses Lake, Washington Trails Committee and others support the proposal to abandon the current rail line. Construction of a new line to provide heavy traffic rail service to the Port of Moses Lake, at the former Larson Air Force Base, would cross three busy four-lane arterials, cross numerous two-lane roads,

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cut through Blacks Addition residential area and run alongside the Longview Elementary School. This route would have an undeniably unfavorable impact on school children, emergency services, pedestrians and vehicle traffic.

Currently, the Port ships fewer than ten rail cars per year. We do not oppose expansion to the Port, but not at the expense of our businesses and the subsequent loss of tax revenue to the community. The Port's philosophy seems to be, "if you build it, they will come." Since current outgoing cargo transport loads would show no appreciable increase until some time in the speculative future, to invest in industrial infrastructure when Columbia River water supplies may be uncertain with environmental change occurring, this philosophy is too expensive and simply not good planning.

The proposed Northern Columbia Basin Railroad engineering project would ultimately cost taxpayers \$69 million in state and federal funds if all phases were approved. Surface Transportation Board licensing fees and the cost of preparing state and federal environmental impact studies will cost even more. And no one has addressed the issue of how these additional railroad crossings of Crab Creek and Rocky Ford Creek would impact the fishery.

We urge you to ensure that current rail service to our businesses is not disrupted and would greatly appreciate a confirmation from your office stating that no abandonment of our section of railroad will incur with the new track construction. This way, rail service will be maintained to the Port, existing businesses will continue to prosper and no additional disruption of traffic or safety to our children will incur.

Thank you for your consideration of this important issue.

Best regards,

Jerome Brotherton, Brotherton Seed Company, Inc.
Glen Dart, Moses Lake Iron & Metal, Inc.
Aaron Gimmeson, Ferrell Gas, Inc.