



File Code: 2820
Date: September 23, 2015

Ken Blodgett
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Dear Mr. Blodgett:

Enclosed are the comments of the Custer Gallatin National Forest regarding the Tongue River Railroad Environmental Impact Statement (Draft EIS).

Impacts to Viewshed and Recreation Resources

Increase in recreational use: The proposed project may result in a rapid influx of new residents (workers, their families, service providers) and an accompanying increase in recreational use of nearby NF land. This could strain NF staff resources to provide increased patrols, law enforcement, maintenance, clean-up, and also may tend to displace traditional local Forest users. This could also lead to some resource, road, facility and trail degradation and visitor conflicts.

Increase in illegal residential use: With the influx of new workers at quantities that exceed the local existing infrastructure, workers may try to set up illegal residence on NF land, by living in trailers, campers or tents. The results would be similar to those in #1, straining FS staff capacity, resources being degraded, garbage, human waste and streams polluted.

Potential degradation of the quality of viewsheds from NF lands: The new rail lines would be visible from many points on NF land. The viewsheds of greatest concern are those from popular high points with commanding views and from those areas on NF land where the rail line is visible. Since these viewpoints are all in semi-primitive, non-roaded settings, the general expectation of Forest visitors is to see overall natural appearing scenery. Noise, motion and lights of frequent trains would tend to draw viewers' attention to the distant rail line, degrading the quality of the viewsheds. Dispersed campers in locations with views of the railroad would notice a lightening of the night sky, along with railroad noise.

Cumulative effects of the above issues: The potential impacts to NF land and NF visitors should be considered cumulatively along with potential effects of the proposed Otter Creek Coal Mine.

Impacts to Heritage Resources

Ethnogeographic Landscape: The ethnogeographic extent of the Northern Cheyenne use includes the Otter Creek/Rosebud Creek/Tongue River/Powder River area. This has been documented in the 2010 "Northern Cheyenne Ethnography of the Tongue River/Powder River Plateau", a cooperative project of Native Action Institute, Chief Dull Knife College, the Northern Cheyenne Tribal Historic Preservation Office, and the Custer National Forest. It is not



referenced in the EIS. Any evaluation of the effects of a new rail line on cultural and traditional resource sites must take into account the entire ethnogeographic landscape for a context in which to measure and mitigate adverse effects within or adjacent to the ten “build” alternatives.

Ethnography of the area with specific site locations is lacking for the APE – waiting until the Build alternative is licensed (per the draft Programmatic Agreement) may be too late since this commitment would require mitigation of these ethnographically sensitive resources. A commitment to a build alternative route prior to complete identification of culturally sensitive sites, traditional cultural properties and tribal resources may cause difficulties in finding ways to avoid, minimize or mitigate adverse effects to these significant sites, especially graves.

Culturally Sensitive Areas: For the Tongue River, Tongue River East, Decker Alternatives there is no analysis of visual, audible, atmospheric or vibration effects to known traditional cultural properties, plant collection areas or tribal sites of significance that are located within 1 mile of the build corridors on forest service lands. The Tongue River Breaks are considered culturally sensitive areas as referenced in the ethnogeography cited above. The width of the archaeological inventory corridor should be as wide as that for the “built” inventory corridor – the presence of vulnerable resources such as petroglyphs, pictographs, and rock shelters could be close enough to the route that vibration, visual intrusion, dust, vandalism could adversely affect these sites.

Indian Homesteads: Northern Cheyenne families were encouraged and did stake homestead claims within the Tongue River corridor, Ashland, and Otter Creek valley and remains of these homesteads may be present along the various railroad routes. More analysis and research on the Indian homesteads along the Tongue River, Tongue River East, Decker Build Alternatives is necessary since Joan Brownell’s 2005 work was limited to forest service lands.

Should you have any concerns or questions please contact Liz McFarland at (406) 587-6757.

Sincerely,



For
MARY C. ERICKSON
Forest Supervisor