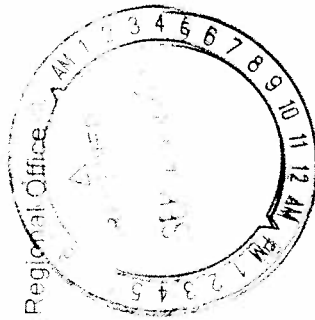




National Wildlife Federation®

Northern Rockies, Prairies & Pacific Regional Office,
240 North Higgins, Suite 2
Missoula, MT 59802-4445



MISSOULA, MT 59802

APR 1 1993

Ken Blodgett
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

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September 22, 2015

Ken Blodgett
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

ATTN: Office of Environmental Analysis
Docket No. 30186

Dear Mr. Blodgett:

As affiliates of the National Wildlife Federation, the Montana Wildlife Federation, the Association of Northwest Steelheaders and the Idaho Wildlife Federation write to oppose issuance of the permit to construct the Tongue River railroad. Our organizations strongly oppose this project because it will spur harmful coal production in the Otter Creek area – a very productive wildlife area, will add to climate change that threatens wildlife everywhere, will spur coal train transportation towards the West Coast, and will result in new coal export terminals in the Pacific Northwest, harming habitat and species in that region such as salmon and orca.

Our organizations represent thousands of members in the northern Rockies and Pacific Northwest and we have long worked to protect fish and wildlife resources in our respective states. All of our organizations are deeply concerned with the connected impacts of coal development in southeast Montana. The Otter Creek strip mine, the Tongue River railroad and the coal ports on the coasts of Oregon and Washington are connected at the hip. Each development will impact the environment. But evaluating the impacts of individual projects ignores the central fact that the ports, the mine and the railroad will all occur if one occurs. The connected and cumulative impacts of three projects need to be examined at each phase of environmental review.

The Otter Creek mine area and the area that will be affected by the TRR support a unique agricultural area where farming and ranching practices have long sustained significant wildlife populations. Southeastern Montana provides habitat for a rich diversity of wildlife species including mule deer, elk, antelope, mountain lions, and bears. These wildlife will be directly impacted by the loss and fragmentation of their habitat, blockage of migration corridors, collisions, noise, fencing, coal dust and other impacts. The DEIS does not properly evaluate

these impacts, using a very short study period (9 months) that failed to assess many areas and several impacted streams.

In addition to impacts to fish and wildlife, the TRR, the Otter Creek Mine and the new coal terminals will profoundly impact several Native American communities. The Northern Cheyenne Reservation is immediately proximate to the mine and railroad and applaud the decision by the Northern Cheyenne Tribal Council to oppose the permitting the TRR. Rail and port impacts will also affect several tribes in the Northwest and these tribes have also voiced opposition to the coal ports that the TRR will make possible.

Beyond the impacts to wildlife and human communities, the climate impacts from this project will be severe. The Otter Creek area has well over a billion tons of coal and the expected carbon emissions from combustion of this coal will represent about 6% of total U.S. greenhouse gas emissions.

Climate change poses a direct threat to wildlife and human communities. If carbon pollution continues unabated, scientists predict that higher temperatures will lead to extinctions of a third or more of species around the globe. With a warming world comes habitat shifts and severe impacts to many fish and wildlife species. The latest National Climate Assessment report shows that many areas are already experiencing the impacts of climate with rising seas, heavier precipitation, and changes in growing seasons, decreased cold and snow pack, increased incidence of pests and devastating wildfires and droughts.

The Obama Administration has taken a series of recent steps to curb carbon pollution emissions, such as instituting the first-ever limits on carbon emissions from our power sector – largely from domestic coal combustion – and proposed limits on methane pollution emissions from oil and gas production, transportation and processing. As a result of these policies, domestic coal demand is plummeting, meaning that the coal that will be mined from the Otter Creek is almost certainly bound for export, most likely Asia. This not only means that this coal – which lacks a viable domestic market – will end up worsening climate change through emissions overseas, but that the coal will need to be moved to port where it can be exported.

Exporting this coal will also have immediate impacts on wildlife that the DEIS ignores. These include the impacts of moving the coal along rail lines throughout the intermountain West; for instance, increased risk of forest fires, coal dust pollution, increased noise, heightened collision risks, blockage of migration corridors and other similar impacts. It will also lead to more export activity on the West coast, including possible expansion of existing ports or building new ports.

Increased export activity poses direct threats to wildlife. It will result in increased tanker traffic that can kill or disturb orcas and other marine mammal populations. Construction causes erosion, runoff and other pollution problems that harm salmonids, as does the deposition of coal dust into waters. The DEIS simply ignores these impacts, which include impacts to species such as salmon and orcas that are protected under the Endangered Species Act.

In conclusion, the Tongue River Railroad is a risky project we do not need. At a time when we are taking efforts to protect habitat in the West and slow the effects of climate change, building

a railroad that has the sole purpose of allowing major habitat disturbance for the extraction and foreign combustion of carbon intensive coal makes no sense. We urge the Surface Transportation Board to properly account for all the wildlife impacts of this project and to appropriately conclude that the project should not proceed.

Thank you for your consideration of these comments.

A handwritten signature in black ink that reads "Michael T. Gibson". The signature is fluid and cursive, with the first name "Michael" and last name "Gibson" clearly legible, and "T." as a middle initial.

Michael Gibson, Executive Director
Idaho Wildlife Federation
921 Orchard Street
Boise, ID 83705

A handwritten signature in black ink that reads "David Chadwick". The signature is cursive, with "David" and "Chadwick" written in a flowing style.

David Chadwick, Executive Director
Montana Wildlife Federation
5530 N. Montana Ave.
Helena, MT 59602

A handwritten signature in black ink that reads "Robert Rees". The signature is cursive, with "Robert" and "Rees" written in a clear, flowing script.

Bob Rees, Executive Director
Association of Northwest Steelheaders
6641 SE Lake Road
Milwaukie, OR 97222