

Y WALLACE D. McRAE
ROCKER SIX CATTLE CO.
3607 ROSEBUD CREEK ROAD
FORSYTH, MONTANA 59327-9411

ATTN: Docket No. 30186

My name is Wallace D McRae. I am president of Rocker Six Cattle Co., a family owned ranch located between Rosebud Creek and Tongue River in Rosebud County. I am a third generation livestock rancher in this area, both of my grandfathers having come to this area of Montana in the 1880s. I am a graduate of Colstrip high school and Montana State University with a B S degree in Zoology and a minor in Chemistry. My father died while I was serving as a line officer in the Navy. Upon returning home after my father's death I have been actively ranching in a cow-calf operation.

Our family ranch has been threatened by various permutations of the Tongue River Railroad since the early 1980s. I am a nationally recognized Cowboy Poet, having received a Folk Award from the National Endowment for the Arts in 1990. Because of my concerns and fears, I wrote a poem titled "Eminent Domain," and read it at the first annual Cowboy Poetry Gathering in Elko, Nevada in 1985. Although the intensity of the threats posed by the railroad ebbed and flowed through the years, it was always there...a constant threat to our ranch from entities who neither understood, nor cared, what problems the railroad could or would affect to our livelihood or way of life.

Rather than comment on a page by page reaction to the Environmental Impact Statement (EIS), It might be more relevant to attempt to describe the historical relationship between the "railroad" and the local ranching community and how it has changed through the years.

After the underground coal mine disasters at Bear Creek and Red Lodge, Montana that killed a number of miners, the Northern Pacific (NP) decided for several reasons it would be better to find a replacement location and open a strip mine in order to fuel their steam locomotives. Colstrip was the location selected. Land for the town and mine was purchased from Freeman Philbrick, or perhaps his daughter, in the early 1920s. The land had been homesteaded by Philbrick's daughter Genie (Dowlin, Fulmer). With the sale of the land, Freeman Philbrick saw an opportunity for both the NP and the area's ranching community, and as part of the deal persuaded the NP to build and maintain a livestock stockyards. The Colstrip Stockyards opened a vast local supply of livestock to be shipped to primarily Sioux City or South St Paul markets. It was no longer necessary to trail cattle long distances from this area to the CB&Q Railroad located long miles to the west. Eventually, as trucks proved more advantageous to ranchers, the hauling of cattle, and the type of cattle to be shipped changed. Rather than holding cattle until they were mature, ranchers moved from marketing two and three year old steers to shipping calves, a more conservative and less risky marketing and management system. At the same time it became more financially advantageous for the railroads to cease hauling livestock and devote more efforts to hauling other commodities. The NP continued to utilize the strip mined coal at Colstrip for their locomotives, but sold the stockyards to a local rancher, Leo Farley, who then asked other local ranchers to invest in the facility and install truck loading chutes for livestock. The Colstrip

Community Stockyards Corp. was then formed and incorporated in the State of Montana. Up to this time there had been a warm symbiotic relationship developed and maintained between the ranching community and the NP. The Northern Pacific was a consistently good neighbor. They leased land for grazing and farming that they had acquired in their federal land grant to local rancher and paid their taxes without protest. When the local school houses proved to be inadequate the NP had a new brick school constructed and leased it to the school district for a nominal annual rent.

In the early 1950s the first diesel locomotive showed up to haul the coal from the mine.. Colstrip no longer was an important part of the NP. They then began merging and taking over other railroads. They calculatedly forced the closure of the Milwaukee Railroad and merged with the Great Northern thus eliminating the only competition in the area. AS they merged with other railroads the corporate philosophy changed. One of the local wags observed this by saying, "Every time the BN merges with another outfit there are two executives qualified for one job so they fire the nice guy and put the asshole in the job." The boom that began in 1923 in Colstrip died. The mine closed. Colstrip became a near ghost town, or as a refuge for local ranch laborers or retired folks who could use cheap housing. The school struggled on. The company grocery store and the gas station disappeared. Only one bar managed to keep open. It was over, and the warm community feeling between the old NP and the newly merged BNSF not only faded, but began to be strained.

Then in the 1960s the second boom began. Montana Power Company (MPC) purchased the mine, town and any equipment that remained. The mine reopened. Miners returned. Coal-fired power plants were proposed to burn the coal. Some hostility developed between the ranching community and the corporate bosses of the MPC and the BNSF. The ranchers asked the new corporations if they would consider prepaying their taxes Other real property owners were resentful for being forced to pay for the infrastructure required by the industrial boomers prior to their industrial properties going on the tax rolls. They asked MPC to prepay some of the taxes mostly to support the increased costs of building and financing new schools. They were laughed at.

The original owner of the Colstrip town site and mine, MRS. Genie (Philbrick) Fulmer leased several sections of grazing land west of Colstrip. Being an aging widow and unable to work and supervise a ranching operation, she unknowingly violated a provision of her lease with the BNSF and subleased her ranch to a neighbor without the railroad's approval. The BNSF immediately took her leases away from her then leased the land to the neighbor for more money.

The President of the Colstrip Community Stockyards Corp. was notified that although the ranchers owned the yards, the ranchers bought only the stockyard improvements but not the land upon which it sat. The BNSF wanted to devote the site to a staging area for the power plants that were to be constructed by MPC and not only refused to consider selling the land to the Stockyards Corp. but notified them that the ranchers would be advised by mail to remove their property within 30 days, after which the "improvements" would then go to the landowner. The Colstrip area ranchers were forced to construct a new livestock shipping facility a few miles south on ranchland near Rosebud Creek.

I could continue to give examples of the impossibility of the local ranchers dealing with their corporate neighbors, but believe any rational decision maker would conclude that recommending that conflicts between affected landowners and the BNSF be resolved through mutually agreeable "negotiation" will prove to be impossible.

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While a seventh grader taking a course in "Civics" in Colstrip elementary school, and later in a Government class at Montana State, I learned that the proper and constitutional role of government is to represent the PUBLIC. That is the way it is supposed to work. That is why we have laws that spell out the responsibility of governmental entities to FAIRLY represent and consider all interests in controversial environmental and property rights questions and honestly and equitably resolve those potential conflicts with an eye towards best serving the PUBLIC. There is no argument that, in order to represent the public good, as in the case of public lands, National Parks military bases, highways and a multitude of other cases, it is often necessary to use the power of eminent domain. The use of eminent domain becomes more and more problematic when private and especially for profit interests begin to abuse the practice as an easy and cheap way to acquire land that they desire. So, although condemnation of lands is often necessary, more and more often it is being abused by private interests, aided and abetted by biased preparers who are selected by, and paid for, by the applicants.

More and more often EIS's are not about the negative environmental effects of a proposed action but a mere exercise in requesting (and getting) a permit for an activity that mostly represents an opportunity for corporations to accomplish a single goal, "maximum profit." The benefits to be generated ("taxes," "jobs," and Increased "economic activity") are all part of the sales pitch or the advertising campaign generated to get favorable opinions..., and thus political support, for the project. Over the years, I have been amazed and impressed at the extensive efforts to sway public opinion and resultant lack of governmental enforcement of laws and permit conditions. "Global Warming" and "Climate Change" are characterized as "environmentalists' hysterical lies." But are losing ground, with the public, but the efforts continue. Facilities that once were called "Coal Fired Power Plants" have suddenly become "Steam Electric Stations." Coal ash is no longer considered to be "Hazardous Waste." Ash ponds at Colstrip that are required by law and permit stipulation to be "completely sealed" have been leaking more than 350 gallons per minute for thirty years. The Power Plant (excuse me... "Steam Electric Station") owners maintain that 350 gpm only represents "seeping" which was acceptably expected event though the owners have paid out millions of dollars in damages and settlements. The threat to adjacent property owners' continues to be a concern. The same sort of "branding" is evident in the TRR EIS. Note where the Otter Creek coal is often described in the document as being "low sulfur" (Compared to what?) but never is it accurately described as being "high sodium" coal.

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Having been the recipient of an avalanche of EIS's over the past decades, ever since the passage of the Montana Environmental Policy Act (MEPA), and NEPA, and SMACRA etc. etc. etc., I have become a student and even more bitter critic of Environmental Impact Statements. However in the instance of

the multi-volume, current product, I am truly impressed that so much effort was expended in a monumental endeavor to say so very little. Although it is an impossible task, I will attempt to comment on just a few of the most egregious things that are in, or absent from, the document(s) within the limited parameters of my expertise and time and patience.

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Page Q&A-1. First Question: **"IS THIS THE SAME PROCEEDING THAT HAS BEEN AT THE AGENCY SINCE THE 1990S?"** This is the same proceeding that has been going on since the 1980s despite the statement to the contrary. Is this somehow different because the STB has replaced the ICC? Is it different in that there is something new and more relevant in this document? The only thing that has really changed is the overwhelming increase in size of the draft. Why doesn't it dawn on the OEA that if there was a **NEED FOR THE RAIROAD IT WOULD HAVE BEEN BUILT DECADES AGO**. When will it finally be decided that any logical reason to consider, let alone approve, an idea that was bad to begin with and has only grown worse with the passage of time and events.

Page Q&A page- 2. "What is the proposed project?" What is the **DESTINATION** of the coal? Without this information there is no reason for this entire exercise. Two elements are needed in order to seriously consider the purpose. 1. Will an environmentally and economically acceptable mine permit be approved? And more basically,. 2. Where is the coal going to be burned?

Page Q&A-2 "How many trains per day?" The EIS states 7.4 trains per day, then on the next page (and throughout the document) it says that there will probably be other mines developed bringing the total up to 18.6 or 26.7, but only the lowest number (7.4) is analyzed. Why is this conflicting information not resolved. Why doesn't the document answer its own question: How many trains per day?

Page Q&A -3. "Could the rail line haul more than the 20 million T/year from the Otter Creek Tract?" Here, and throughout the EIS, there is an effort to promote the idea that two other mines in the area will be developed if the TRR is approved. This assumption is patently untrue and is merely hype to dishonestly justify approval. The **Poker Jim Creek--O'Dell Creek deposit is not a viable, or economically feasible prospect for development**. It is really, despite the name change, still the same old "Montco " deposit which for several reasons was never developed, despite receiving a State of Montana permit. First of all, the Montco deposit could probably not have been mined due to its location in the flood plain of the Tongue River which is part of the hydrological complex of the river. Subsurface water, above the coal seam would have flooded the mine making the mine plan impossible to execute. Secondly, the overburden above the coal was so highly sodic that mixing it with the small amount of chemically acceptable overburden would result in a soil material unacceptable for placement in the root zone of the surface or back into the Tongue River Aquifer. Recognizing this, the State of Montana granted a permit with a provision preventing the usual use of a dragline method of overburden removal. The state permit required a mining method using a "Truck and Shovel " removal process using the limited amount of relatively benign overburden at the bottom(to insulate the aquifer) and top (to protect the root zone) when replacing the spoil material in the pit. Thus the Montco Mine was, and probably is, economically unfeasible unless the laws are to be ignored and the Tongue River be declared part of The National Sacrifice Area as Recommended in the infamous North Central Power Study. (Which I am unable to find any reference to in the entire TRR EIS, but appears to be in effect in much of the Powder River Basin Area!)

As to the Canyon Creek deposit ever being developed, we only need to look at the ownership of much of the private land above the Canyon Creek coal and consider at the same time the ownership of the TRR. Forrest Mars, Jr., owner of the Diamond Cross Ranch, was a strong opponent of the TRR because one of the alternatives being considered by the STB would cross his ranch. Being a billionaire, Mr. Mars, in order to protect his ranch, bought into the ownership of The TRR for a share paying a reported \$60 million, and suggested to his partners, BNSF and Arch Coal, a new "preferred alternative," the Colstrip Route. Suddenly, what seemed a bad idea became a good one to Mr. Mars as long as the Colstrip Route would impact other property owners. Further the "surface owner consent" provision of SMCRA provides the surface owner with the right to veto strip mining federal coal under their land surface. The Diamond Cross Ranch appears to be the major surface owner above the Canyon Creek deposit. Are my assumptions correct?

Page Q&A – 4 "How does the mitigation process work?" From a potentially impacted ranch perspective, the answer is: **Absolutely not at all!** There are no suggested mitigation measures for affected landowners whose agricultural bases and livelihoods will be cut to ribbons. Proponents of the TRR have promoted the idea that there are many ranches that have no, or minimal problems with a railroad, but without exception those cited ranch operations were built around an existing, not new, railroad. The TRRC's voluntary mitigation measures are certainly praised, but it is nearly impossible to find even one measure that will benefit affected landowners, native Americans, home owners' the Tongue River Amish Community or any others suggested by the EIS. I personally have communicated my concerns about cattle using a culvert to pass under the track(s) to the Office of Environmental Analysis of The Surface Transportation board. I asked that the OEA recommend, where possible the use of bridges instead of culverts for use by livestock. When I was informed that culverts were cheaper than a bridge, I responded by asking "for whom?", considering the financial status of the railroad sponsors compared to our ranch. I tried again pleading my case for bridges for cattle to use, and was informed that "Cattle will learn to use culvert underpasses." I believe this is a pro-applicant bias that exists throughout the entire document. Just as upsetting as the attitude expressed in favor of culverts was the insulting bias that someone in an office in D.C. knew more about livestock instincts and behavior than I, with a lifetime of experience in understanding of cattle. The answer to the "NEPA question" solicits suggested comments from the public and agencies for additional mitigation suggestions. My experience of over three decades of dealing with The TRRC and the Surface Transportation Board and the ICC leads me to respond with a frustrated, Why Bother? Local elected and hired public employees are hesitant to comment on a project that has been projected as a universal good that will produce a bonanza of "economic development, taxes and jobs. "The federal agencies dealing with the TRR have always dismissed comments or protestations on impacts of the railroad. True impacts to ranches are ignored or handled with a "comment noted" instead of any effort at true mitigation. Perhaps it is a reflection of my personal frustration with the OEA and the EIS because of the unacknowledged negative impacts on our, and other ranching operations. The assumption that by granting the right to literally destroy our ranch, we will somehow be able to "negotiate" with the railroad to resolve our problems makes me absolutely livid in its unfairness.

Page Q&A – 6 "Would construction and operation of the proposed railroad contribute to climate change?" Try as I might to figure out what the EIS answer to this question says, I must admit that I

remain confused. After seeming to advocate additional mines in the vicinity of the Otter Creek deposit and hinting at the strong possibility of Asian exports, you appear to subscribe to the theory that none of these events will occur, so there will be no degradation of air quality which is a good thing, so it's okay to develop those new mines. Is that right? What if the Otter Creek tract was not developed and The TRR not built? If you figure out what you are saying, or trying to say here, let us know because we are really confused!

Upon slogging through endless rhetoric that obviously is calculated to say little or nothing, I kept trying to find some mention of the proposed railroad's impact on agriculture in general and more specifically on domestic livestock, and those of us who depend on them to make our living. In desperation (finding cattle, for instance, used only as an adjective—as in “cattle guard” or “cattle pass”) I finally resorted to the Q & A portion of the document in Volume 1, under the heading of “Biology” Q&A-7” which back when I took that course from Mr. H. V. Russell while in Colstrip High School, included plants and animals. I was surprised when I discovered only threatened, endangered and big game species were mentioned as members of the Animal Kingdom and under the “Flora” category a weak mention of attempts to “minimize the introduction and spread of noxious weeds!”

The failure to mention the impacts to our livestock operations is nothing short of criminal in my view. With literally tens of thousands of words in the documents of the EIS, the writers should be ashamed to leave any conflicts between the railroad and the people affected by its construction and operation up to “negotiations” between the parties! Do the people involved in preparing the EIS have any idea what it is like to “negotiate” with various smug representatives of The TRR? The only thing that has been accomplished after over thirty years of “negotiations” is for me to have become a frustrated and bitter person. With the constant reminder that they possess the power of Eminent Domain and unlimited financial power as well, only the naïve, or hopelessly biased, would recommend that resolution of conflicts between the TRR and landowners be resolved by “negotiation.” In reality this bias throws us to the wolves. Our experience with these matters tells us that once a permit is granted, construction will start immediately before “negotiations” have been resolved.

Further, once construction has begun, it's over! After over thirty years of dealing with the TRR, I cannot recall one instance when my wishes were even considered, let alone granted. In fact, in the past the staffs of both the ICC and the STB have refused to even consider what I believe to be reasonable requests on my part for mitigation.

The portions of the EIS concerning fire are woefully inadequate. (Sects 8.2.3.2., 8.2.4 and 8.2.4.2) For starters, did the EIS preparers contact the Rosebud County Fire Marshal for his reaction to the question of wildfires in Rosebud County? As a volunteer member of the Rosebud County Fire department for over two decades, I am concerned about fire in general and specifically in my area of responsibility. The Fire Marshal attended at least one of the public hearings, but had no questions or comments. I asked him if he was going to submit a review of the EIS but he indicated that he was not going to do so., He is much more qualified than I and I would suggest that it would be encouraged him to express his impression of the subject of wildfire in the EIS.

There is a complete lack of relevance in citing the Montana DNRC statistics on statewide fires from 1981 through 2010. There are several reasons why the incidence of wildfires attributable to railroads, according to the Montana Department of Military Affairs Disaster and Emergency Services, is an undependable source of information to extrapolate into concluding that there is a decidedly low prospect for railroad-caused fires being a significant problem in the study area. First of all, most railroads currently being operated are dissimilar to the area of the EIS. The vast majority of these roads are along live streams, many with irrigation between the tracks and the streams. Next the railroad caused fires there usually public roads in close proximity to the tracks which would lead to quick containment of any fire. Finally, railroad-caused fires, especially those that attain a significant number of acres, are vehemently denied as being caused by the railroad so, rather than pursue the true question of cause, they are conveniently attributed to other factors. After fighting fires as a county volunteer for over a quarter of a century, I have an unverified theory that there are varying belts of frequent and infrequent lightning, or at least of fires as a result of lightning. My observations indicate that a band of frequently experienced lightning-caused fires extends from the Sarpy Mountains on the west, to the Cook Mountain and the divide between the Tongue and Powder River. The south boundary of this area would be Highway 212, and the north boundary would end with the lowering elevation that drops below the clinker and sandstone regions of sedimentary rock, (Or just below Colstrip and the EV Ranch on the Rosebud Creek.)

The two major fires of 2012 are barely mentioned. Is the OEA aware of the number of acres wiped out in the combined Ash Creek and Chalky Butte Fires? Is it irrelevant how many head of cattle were burned alive by these two tragic fires? Apparently these figures are not relevant to the study of the area. In fact, the EIS would have us to believe that although "Most woodland was completely lost (all trees, shrubs, and grasses were destroyed), in late summer of 2013, OEA documented rejuvenation and colonization during wildlife baseline surveys." And "...OEA observed abundant wildflowers and grasses (in spring and summer of 2013) in burned areas and sprouts at the base of many burned cottonwoods."

I would also point out that the majority of fires in the study area are not, as the EIS suggests, human caused, but in the time period covered, are a result of lightning. Another recent situation has developed in the area encompassing of the Colstrip Route. The combination of the Ash Creek and Chalky Point fires set literally hundreds of previously stable exposed coal seams on fire. Thus far this year my son and I have been called out to nearly twenty fires in this area. Most of these fires originated at smoldering coal seams. One large burning coal seam on the northern boundary of the Northern Cheyenne Reservation started three fires on both private and Reservation land. Normally we are especially alert to detect smoke indicating a fire after a lightning storm, but these coal seam fires are a relatively new phenomenon. Access to these, and other naturally occurring fires, will be extremely difficult with a railroad blocking access in isolated areas. It is critical that these issues be addressed in the EIS.

Rather than naming an actual market that might be examined as fulfilling a need for the coal, we are told on Page 1-5, that "TRRC has defined the following target markets." "Target Markets? The EIS fails a basic requirement by substituting a "wish list" of either faintly possible but mere speculative places that the Otter Creek, and other "possible area mines" might find a market. **"Target markets" do not fulfill the requirement for a demonstrated need.** Surely a specific market must be named, or the whole

project must be rejected. I imagine that the TRR will claim that they will protect their market for "propriety" reasons. What the TRRC is actually saying in their analysis is that they either don't know, or don't care where the market is located, but "trust us and once we get the permit we'll figure it out and let you know. We promise!" The TRRC has been successfully playing this game for years. The TRR is now, and has always been, a mere speculative exercise. If there had even been a true NEED for it the railroad would have been built and in operation years ago. If there was a true need why, after receiving many permits for construction, was the project not even begun. The answer is simple.

THERE HAS NEVER BEEN AN ACTUAL NEED FOR THE RAILROAD. THE TRR HAS ALWAYS BEEN A MERE SPECULATIVE VENTURE.

The list of possible markets involving three continents is quite telling, and the failure to describe a possible location for the coal to be used for power generation in Montana is pure pie in the sky considering that coal-fired plants in Montana are currently being closed, or are threatened with the same fate. The other coal mines in Montana would be concerned if there was a possibility that their markets will be taken over by Otter Creek and there was a possibility that their mines and labor forces would be affected. The word on the street throughout the coal region of the Powder River Basin is that, despite what the TRRC's "computer model" says, there is no possibility for Otter Creek coal to go to the Upper Midwest or any of the other places mentioned in the "Need Analysis." The only possible market for the Otter Creek coal is in China. The other prospects are a smoke screen that are and are only posed for deceptive purposes. Once the STB grants a permit, port facilities in the Puget Sound will be condemned and constructed, there will be a left turn where the TRR meets The BNSF at Nichols and the Otter Creek coal will be China bound. Why has the TRRC minimized this possibility before the STB? I believe that even though their sole goal is to ship coal to China the TRRC is a bit concerned that the NEED requirement to get condemnation rights is severely weakened if the coal is not for domestic use. That is why the house-owned computer was programed to come up with a domestic USA need in the Upper Midwest. I would suggest that the "garbage in, garbage out" computer might be suspect.

The TRRC seems to believe that the permit granted by the ICC in 1986 is still valid. In fact they quoted it in their STB Finance Docket No. 30186 (page 15) filed in 2010 which led to the current application.

They state:

The ICC previously determined that the construction and operation of the approved rail line was consistent with the public convenience and necessity. Specifically, in approving the rail line in 1986, the ICC stated "(w) e adopt the reasoning and conclusions of the initial decision finding that the construction, operation and financing of the subject line by TRRC meet appropriate public interest standards in 49 U.S.C. 10901a and 11301. The evidence of record shows a need for rail transportation to serve coal mines in the Tongue River Valley. This is a provident and necessary expenditure that will give shippers new rail service to their benefit and to the benefit of the public as well." 1986 Decision at 10.

This is not 1986. In 1986 there was no suggestion, let alone certainty, that the coal was going anywhere but the Upper Midwest. (It may be a minor point but in 1986 the ICC and the TRRC were considering hauling coal from the Montco mine which was located in "the Tongue River Valley" (—which is not Otter Creek—) It is ridiculous to pretend that the same domestic demands for coal exist today as may have

been a possibility in the 1980s. So why permit and build a new railroad condemning private land for a speculative short term venture

Finally, I believe it is important for the Board to consider the public hearing record. I have, through the years, become cynical of the effectiveness of public hearings. Nearly without exception the industrial applicant's wishes prevail and the requested permit, with a few weak token and cheap modifications to the application, is granted. Often pertinent questions raised by the public are answered in the Final EIS (If they are included if at all) with a terse "Comment Noted." And ignored. This time around there was a significant difference in the public hearings compared to those in the past, on the same old TRR. The earlier hearings, back into the 1980s and after, featured both strong support and opposition. This time around there was a glaring, almost complete, lack of public comment in favor of the granting of a permit. The only support that I recall from the ten hearings, was limited to a couple of people who were not so much in favor of the railroad, but spoke of a dislike of ranchers and other landowners who were not particularly hospitable during hunting seasons. There were no bankers, merchants, local politicians, chambers of commerce or any of the usual "growth at any price" proponents. Even the current cry for "Jobs" was in short supply. There was no organized union support for jobs. If public opinion expressed in the public hearings is in any way to be considered, the No Action Alternative, although expressed in different ways, perhaps, was the overwhelming choice. That is one, perhaps too obvious conclusion,. There are at least a couple of other possible reasons for the lopsided opinions expressed.

The first possibility is that the TRRC's credibility has finally worn out. For decades they have promised again and again that they were on the brink of presenting a wonderful new economic and employment gift to Southeastern Montana. That promise in light of the experiences with the rise and current decline of the future for coal, the extremely short duration and social and subsequent negative impacts of "Fracking" in the Baaken oil patch and the recent mess left by the gold miners in the Zortman/ Landusky area, have reminded Montanans of the unfortunate exploitation by industrial giants in the past. The word is out that the BNSF is not a good neighbor despite their constant paid advertising to the contrary.

There is one other more disturbing possibility concerning the lack of public support for the TRR. Governmental agencies are so inclined to refuse to say no to industrial, especially energy related, interests that there is a general feeling that there is no reason to publicly support a project that is going to be automatically approved by the permitting agency. The TRR has already received permits from the ICC and the STB whenever they requested them. Did the project begin? No. Modifications were requested. New Routes asked for and approved. Opponents were ignored, so why bother. The opponents may whine and cry, but no government agency, thus far, has had the guts to deny a couple of billionaires in getting their way.

I pray that this last possibility will not be the result of this most recent attempt to take our land despite decades of trying to protect the integrity, historical, cultural and economic viability of our family ranch for an unneeded and purely speculative enterprise.


Wallace D. McRae