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Submission Text

Attached are the oral comments of citizens given and transcribed at a "people's hearing" in Missoula, Montana. These "people's hearings" were organized in downrail communities whose impacts were ignored in the draft EIS. Please consider all of these comments individually, and address the concerns of the citizens of Missoula in the final EIS.

John Woodland

580 River Bend Road, Superior, Montana 59872

My name is John Woodland and I'm a resident of Superior, Montana. I recently retired after nine years as Superior's fire chief and I speak for myself, not my former employer. Superior is on the rail line currently carrying coal, and will experience a major increase in traffic from this proposal. Derailments in that area are not uncommon due to the mountainous terrain. One that dumped cargo into the Clark Fork River was visible from my home. Another, just a few miles east, dumped aircraft used lodges into the Alberton Gorge Recreation Area.

My fire district includes a number of rail crossings, one includes a passing siding that blocks the only road to a sizable subdivision when that siding is in use. In many cases, water supply for a fire would require a tender shuttle across the tracks. In most cases, a single block crossing blocks all practical access to a large group of homes. Some of these crossings have lights and cross arms and some have warning signs. I have personally sat at a crossing, waiting for a train, while on an emergency response.

If the Tongue River Railroad is built it will substantially increase the rail traffic in this district. It will increase the frequency that emergency responses are delayed by trains. No doubt there will also be an increased in derailments. There are of course fixes in the form of overpasses, but these costs will be passed on to poor communities that can't afford them, while much of the profit from Otter Creek is just passed along to wealthy out-of-state interests.

If the Tongue River Railroad is built the frequency of emergency responses in my community and every other community in Montana that is affected by the rail line will also increase. This will increase as a result of the additional carbon this project will pump into the atmosphere. With this increase will come increased of conflicts at crossings.

It's no secret that the fire seasons are getting longer and extreme weather events are becoming more frequent. Science has made the link between this and climate change. When I was hired, I was told the department experienced around 25 calls a year. When I retired the numbers were over 40. This is another one of those burdens being caused by projects like Tongue River and Otter Creek with the costs shifted to local communities and ignored by the Surface Transportation Board Environmental Impact Statement.

I call on the Surface Transportation Board to consider and address the real costs resulting from delayed responses to emergency calls throughout the rail line, the increased volume of costs caused by climate change, and the fair cost sharing for upgrades to the crossing.

The Surface Transportation Board has dismissed climate impacts based on the farfetched position that if coal goes to market, other sources will remain in the ground. That is a ludicrous assumption that has not been justified in any way, and I call on the Surface Transportation Board to document and justify that assumption.

Cate Campbell

703B Skyla Court, Missoula, Montana 59801

Greetings carbon-based lifeforms! My name is Archie the Coal Nugget. For the last three years, I've been the official mascot for the Arch Coal Company. I'm sure after this public appearance I will lose my endorsement and will probably end up in a power plant furnace.

I am here to testify for the no action alternative. I speak not just for myself, but for the coalition of nuggets in situ, a very large unmined constituency petitioning to simply be left in the ground. We did not ask for our fate, which included being stripped mined, dumped into rail cars, hauled miles from home, and incinerated.

I don't know any members of the Surface Transportation Board, but I've heard there are very nice people in Washington, DC. I appeal to their humanity and conscience when I ask respectfully to just leave us alone.

As an official mascot, I've been accused of being a corporate shill, a sell-out, a gimmick, and worse. I stand here today a reformed nugget, black on the outside and green on the inside. It was never my intention to go rogue, but I rebuke my sponsors who have aggressively promoted the delusion of clean coal. I was not prepared for the backlash from an educated public who knows better. Now I'm left with no choice but to go public.

Coal has been vilified and made a scapegoat in the rapidly increasing degradation of the atmosphere. We've been mined against our will and conscripted into the armies of evil. I can now say with certainty, there is no such thing as clean coal when it is loosed upon humanity.

We nuggets were formed 350 million years ago, even before the dinosaurs, and we want to stay in the ground that we've come to know as home. I'm currently seeking whistleblower status with a new identity and a modest stipend. I understand there are generous fossil fuel subsidies provided annually to the petro conglomerates, so this should not be a hardship.

I say to you the Surface Transportation Board: no mining, no shipping, no burning.

Thank you.

Unnamed Female
Missoula, Montana

My comments will focus on the health issues of the increased presence of coal dust and diesel emissions due to the increased train traffic coming through our communities. As a registered nurse, I am concerned about these health issues. The first issue with coal dust is the question of how much of it will escape along the route from mines in Wyoming and Montana to propose export terminals on the West Coast.

What might that coal dust mean for public health? In 2009, a representative from the BNSF Company testified before Federal Review Board. He stated that 645 pounds of coal dust in a loaded coal train escape from each coal train car during a 500-mile trip. There are usually 125 cars per coal train. The BNSF Company claims that it will apply a surfactant that would decrease the coal dust by 85%. Even if this turns out to be the case and BNSF applies this to every coal car, the coal dust loss on 125-car coal train will still be significant and will certainly not be zero.

A health department's report in Oregon stated that railroad companies and the coal industry should have to prove that coal dust coming off the trains will not be a health risk. Coal has been transported via train for decades, yet little research has been done on the potential health effects for people who live near coal train routes. There is enough risk to merit more specific sampling and research about coal dust before any decisions are made about the transportation of uncovered coal cars.

Another risk is the increased diesel emissions. The diesel emission will increase as a result of the increased train traffic due to the exporting of more coal. These increased diesel emissions will be in the air around the railways in our cities due to the idling and travel of the additional trains. There will also be an increase in vehicle emissions that will likely result from increased idling times at the train crossings.

As a health hazard, diesel particulate matter is associated with both pulmonary and cardiovascular issues, including cancers, heart disease, and asthma. Children, teens and the elderly are especially vulnerable. The possible health issues of coal dust and increased diesel emissions are serious ones for Missoulians, as the trains pass through the heart of our downtown neighborhoods.

Thank you.

Lee Metzger

703B Skyla Court, Missoula, Montana 59801

Lee Metzgar, 703B Skyla Court, Missoula, Montana. I took a look at the climate change and greenhouse gases portion of the EIS and have the following to enter into the record.

If the coal that will be transported on Tongue River Railroad is burned, it will contribute over two billion metric tons of carbon dioxide equivalence to the atmosphere. The inclusive climate change-related costs of emitting that much CO₂ are estimated by United State agencies as between 11 and 144 billion dollars, and even the high estimate may be too low. The dEIS, as we've heard, assumes that selling Tongue River coal from the Otter Creek and other induced mines will simply displaced other fossil fuels and result in little net contribution to the global carbon dioxide emissions.

In fact, 23 years from now, after the life of this project, the Tongue River coal either will have been burned or it will not have been burned. If it has been burned, then billions and perhaps hundreds of billions of dollars of harm will have been done. Whether ignoring these costs, all build alternatives should recognize them for what they are. And the no-action alternative should identify their prevention as a benefit.

It's clear that corporate and public gains from this project simply do not rise to a level of enormous harm that this project will cause. In the shorter term, to the extent that the Tongue River coal will displace more costly alternative fossils fuels, keeping that coal in the ground would encourage continued conversion to cleaner power generation from natural gas and renewable energy.

Because net gains in Montana jobs and wealth had been shown to accompany the conversion from fossil fuels to renewable energy sources, the no-action alternative will result in additional benefits that are not recognized in the draft Environment Impact Statement. These benefits should be included in the final EIS analysis.

There is now consensus among scientists that approximately 75% of known reserves of fossil fuels must remain in the ground if we're to have a chance of a healthy climate. It's time to stop the under insanity of developing new sources of fossil fuels when we know that most of them must remain in the ground.

The Tongue River coal should be at the top of our list of fossil fuel reserves that cannot be developed. It is a dirty fuel that emits subsequently high amounts of greenhouse gases and it will contribute little to our national interest. The enormous benefits of leaving this coal in the ground overwhelm any economic gain from its extraction, sale, and use.

The only way to safely sequester carbon and fossil fuels is to leave it in the ground, and the only clean coal remains unmined. The Surface Transportation Board will serve Montana and the nation best by selecting the no action alternative.

Kevin O'Brien

1630 Defoe Street, Missoula, Montana 59801

Hello. My name is Kevin O'Brien. I live at 1630 Defoe Street here in Missoula. I work as an archaeologist. In my work I have contributed to numerous environmental impact statements, and I have yet to hear of one where there was no particular route that they want to take. There's no preferred route in this case.

I object to the idea that because I live downrail from this that I'm not impacted by this. As everybody who lives in this town, who lives anywhere near the tracks knows, the trains already make enough noise to keep us all up all night every night, as it stands. I don't know how I'm going to sleep if they add 25 more trains to the ones that are already coming through town.

I can't really add much to what's already been said with respect to coal dust, but I challenge all of you next winter to go walk by the tracks and see what's lying on the snow in spite of the surfactants they spray on top of these open coal cars.

I would just like to say that I support no action.

Tim Skufca

107 North Avenue West, Missoula, Montana, 59801

Tim Skufca, 107 North Avenue West here in Missoula. Approving the railroad before the Montana Land Board approves the mine seems a bit like approving the cart before the proverbial horse. If the Surface Transportation Board approves the Tongue River Railroad, there will be a momentum created to approve the mine. You can't separate the analysis of the environmental effects of the railroad from the analysis of the mine.

I realize we're here to talk about the railroad, but the two are so intertwined that we must analyze the entire situation. All projects should go through a cost-benefit analysis. Let's see who benefits from digging the largest open-pit mine in the lower 48, and who benefits from putting a railroad through the pristine Tongue River Valley.

First of all, there's about 100 or so Arch Coal employees, and then including their families, maybe 500 or so of them. Then of course, there's the Arch Coal investors. I can't put a number to this, but as Jim showed you on the graph, price shares have dropped from more than \$70 in 2008 to less than \$1 today. Then there's the fact that big banks are voting against further dealings with the coal industry in general.

How do we put a number to the beneficiaries of this category, this antiquated industry that's not accepting its fate? I don't know, but then there's other beneficiaries. There's the various trades that are employed to get the coal to market. Again, we're not sure how many that is, but let's assign a figure of 1,000 workers that would occasionally benefit from this coal export flow. Then finally, there's the various populations over in Asia that benefit from electricity that's generated from this coal. But we all know there's a better way to generate that electricity.

So, those are the benefits. Let's weigh the costs. First of all, the people affected are the communities lining the railroad from eastern Montana to the Washington or British Columbia ports. The coal will most likely enter this pipeline of sorts by passing through Colstrip and then up north to the I94 Corridor.

Then it goes through Bighorn, Custer, Worden, Lockwood, Billings, Laurel, Columbus - sorry if I missed your town, but the scale of my map probably didn't get them all, but - Reed Point, Big Timber, Springdale, Livingston, Bozeman, Manhattan, Townsend, Helena, Avon, Clinton, Missoula, Arlee, Ravalli, Dixon, Paradise, Plains, Thompson Falls, Noxon, and then through Idaho and, of course, to Washington and the proposed ports. Those are the people.

Then we have to consider the Powder River and Otter Creek basin bionetworks. Countless flora and fauna ecosystems are going to be affected. And then of course, everybody's breathing the air that this is creating. In conclusion, let's say the communities along the railroad that suffer, cancel out the amount of people benefiting from the electricity, let's weight the rest of it. Basically, there's 1,600 people benefiting from mining and shipping billions of tons of coal.

Then I try to find the antonym for beneficiary. I thought maybe "dispossessed." What is the total number of dispossessed, ignoring the thousands along the railroad? It's about seven billion people.

I put before the Surface Transportation Board these two numbers: 1,600 people benefiting, seven billion people affecting. The answer that they should be making is clear.

Thanks.

Trevein Stranger

2404 Rattlesnake Drive, Missoula, Montana 59801

Hello. My name is Trevein Stranger. I live at 2404 Rattlesnake Drive here in Missoula. Thanks everyone for this chance to speak, and thanks to the folks on the receiving end of this, at the Surface Transportation Board, and recognizing this as part of your job. I bet that it's not an easy part of your job, but we are some of the folks you represent. Thanks for hearing us out.

I am a garden educator here in town. All week I've been working with little kids, kindergarten through fifth graders at Lowell Elementary School, which is in the north side, not very far from the railroad in question.

A garden is an amazing place to talk about a lot of the things that we all value in this country. They are certain American values, and I'd say universal values, family values: self-sufficiency, hard work, attentiveness, cooperation, industriousness, so many things we want to pass on to our kids. I think no matter where you land on the political stripe, you see value in gardening and teaching it to kids.

This week we're talking about the health of our plants, how much they give us clean air, the health of the food that we're going to eat from this garden. When you talk to kids, there isn't much room for abstraction. There isn't necessarily room for obfuscation. Right? You just have to say it like it is, and kids can call you out on it if you're saying otherwise.

The same day that we are teaching kids how to be good gardeners and teaching them to value some of these things, we are simultaneously building things right outside the gate that are sending in harmful dust, that are sending in harmful agents. We're undermining what we're trying to do in the garden. That would seem like an incredible, strange paradox for those kids, wouldn't it? They'd probably call us out on it.

Folks you really know these problems we are talking about are pretty abstract for a kid's mind, but really if they could get their head around it, maybe they'd be calling us out on it and maybe they'd be really asking us to consider their future, consider the fact that they're probably going to want to pass some of these things on that we're talking about, and they're sort of counting on us. They are oddly sort of the most dispossessed people on the planet, right?

If someone is dispossessed or disempowered is one who does not have a voice, these kids can't really come here and speak up, but we're the ones who get to. So, I'm really asking folks to keep that in mind. How many gardens, how many schools are along these lines? How many of these children who, as we've said, have very fragile, beautiful, little angelic lungs that look like trees in there, like all of ours. We all share these lungs, we all share this air. There's a lot more going on than just the immediate profit that the other folks are talking about.

Please consider the broader picture. Please understand there's more logic than the one you are hearing from them. Please understand there's much, much more ethics and right and wrong than they're ever going to introduce for you. Thank you for listening to us.

Dave Morris

2120 Missoula Avenue, Missoula, Montana 59801

Hello everyone here and at the Surface Transportation Board. My name is Dave Morris. I live at 2120 Missoula Avenue here in Missoula. Like our last speaker, I am an educator. I instruct college students on field courses. I've been taking university students from the University of Montana and many other colleges and universities across the country to southeast Montana for about 14 years, and going to the Otter Creek Valley, going to the Tongue River country, and meeting with community members, elected officials, many people in the Northern Cheyenne tribe, many ranchers, including Jeanie Alderson who was in that film, who I think we're going to hear a little more about soon.

It is an amazingly vibrant area. It's incredibly important culturally, ecologically, economically to the people who live there in particular and beyond the great productivity of the valleys. The idea of those valleys being sacrificed in order to enrich people who are already rich beyond belief, and at the cost of the ecology and the cultures and all these amazing values that exist in those places, it will be travesty.

I would just add also that I would find it very ironic were we to mine all that coal and increase the danger of catastrophic fires. Anyone who's been through that part of the country knows that in the past five years or so, there have been unprecedented fires burning through the very same country that they have proposed mine to release more carbon into the air; turbo-charged fires. It's just incredibly ironic.

I would very very strongly encourage the Surface Transportation Board to follow the no action alternative and to deny the obscene Tongue River Railroad project. We can't afford to sacrifice those amazing places for private profit.

Thank you.

Carolyn Walker

411 Woodworth Avenue, Missoula, Montana 59801

Hello. My name is Carolyn Walker. I live at 411 Woodworth in Missoula. I am squeezed from both ends of this railroad. That beautiful woman in the video was my daughter. The two little boys swinging from the tires are my grandsons.

What I really want to talk about most of all is water. Missoula has five rivers running around it. The Tongue River is the central point for the creeks all the way around. There's Otter Creek, of course, which isn't all that close to the Tongue River as the crow flies. Then there's Hanging Woman Creek which is where my daughter's ranch is, and East Fork of Hanging Woman Creek, I don't know how it got named that.

The other thing is the groundwater. Water, as people are beginning to understand, is more valuable than any fossil fuel or petroleum, any substance beside air that we have on the planet. A lot of the Tongue River water comes from underground. It's groundwater, and if that coal is mined, it goes away. It just drains away. You can't get it to come back.

The other thing I want to talk about is that we're all told to eat less meat. There's one thing about that area by Clint McRae - and I know Clint's dad, Wally. I lived there for 20 years - is grass. That is really good grass. If we would plough under all the corn and soybeans in the country and begin to raise grass, we'd have fewer beef animals, but they would be better for us, and we'd have less carbon in the air and more breathable air and water.

I want to thank you, and please no action alternative. Thank you.

Dave Dittloff

240 North Higgins, Ste. 2, Missoula, Montana 59802

Good evening. My name is Dave Dittloff. I'm the regional representative with the National Wildlife Federation's Montana office here. I've got five minutes worth of comments I'm going to try to whittle down here to three minutes. We've heard a lot of odd things in the draft Environmental Impact Statement. I'm going to focus in on the wildlife side of things. There's a lot of wild things in this wildlife section as well here.

As you can probably tell from the pictures, we saw a lot of cows in the videos here, but you could just as easily have probably shown a lot of critters. This is a great place for mule deer, for pronghorn, for sharp-tailed grouse. It has major predators like mountain lions and black bears. There are sage grouse in the neck of the woods. This is an outdoor treasure that we have here in Montana. It's undeveloped and there's a lot of critters in it.

Breaking down here the dEIS and the wildlife sections in it here. Basically, their analysis boils down to one line that I'd like to read: "The proposed rail line may affect, but is not likely to adversely affect wildlife species in the area." Some of the shenanigans here, a lot of them involved surveys.

Basically, they studied this area for nine months of one year, and really covered ground, about 1/3 of the acreage here that's involved in the rail linkage. Certainly, it was not a complete survey. The best management practices are that any wildlife professional at the school here would be saying, "You probably need to do a four season study, not a nine months study, and it needs to be a couple of years."

Add to the fact here, is that it immediately followed this nine month study and the limitations with that. But what immediately followed was one of the biggest fires in the history of southeast Montana. You go through that neck of the woods and you can still tell. It was torched up. Obviously, that drastically changed the conditions and the placement of the wildlife in the area. It was a massive fire.

Getting to a couple of examples here, or in addition to that. There's a lot of talk about sage grouse and listing sage grouse, what we do about sage grouse. Their analysis for sage grouse basically entailed a one-day flight in a helicopter averaging 75 feet up in the air, going 55 miles an hour. That's not how you survey upland game birds at all here.

They actually did get down when they saw some tracks there. They actually landed on a state land parcel, and their biologist basically said, "I don't know if this is sage grouse or sharp-tailed grouse." Most professionals in the field with tracks that they even remotely knew are going to be able to tell the difference between sharpies and sage grouse here. It just gives you a sense of the professionalism in the wildlife section of the Draft Environmental Impact Statement.

The kicker, though, deals with the fisheries analysis. Basically, they didn't have one. They did some small surveys of fisheries habitat, but not one fish was touched, not one fish was

located in this entire study. Basically, it's absent and there's just guess work of what the fishery is in the Tongue River drainage and what this rail line would do to the fisheries.

It wasn't just the problems with surveys, though. A lot of the analysis in the draft Environmental Impact Statement was just faulty. Here's another quote here from the dEIS: "The railroad will not impact wildlife populations because 'they are not vulnerable to decline.'" Yes, this is a wildlife paradise in a lot of ways, you think maybe one of the reasons is because it has this broad connected vast landscape with landowners that are doing the right thing, and it has remained undeveloped. Kind of the silliness of the statement goes beyond that. Mule deer across the west are in very historical and noted declines.

They are actually doing okay in southeast Montana. Maybe one reason they're doing okay in southeast Montana is that they're not facing some of the development pressures that they are in other locations and, therefore, haven't been as vulnerable to them. You could go in to species, pronghorn, etc., right on down the line. Mule deer is really a prime example of how that's just a silly statement.

One of the other problems is how this analysis with the dEIS deals with habitat fragmentation and migration corridors. Basically, it gives really short shrift to the concept of habitat fragmentation. Once again, go to any wildlife biology course at this university here, and that's going to be a cornerstone of what they're talking about in it.

The dEIS goes so far as to say that big game populations in this area do not migrate at all. We're talking about a rail line that's going to have miles and miles and miles of fencing associated with it. In an arid landscape, critters need those water sources. They need river. They need the access to the tributaries. Yes, they might not be migrating 100 miles. If they're going to be migrating to where the forage is, where the cover is down to that water quite regularly, they're going to need that access. The railroad and the fences associated with it are going to severely impact it. So, once again, just a silly statement.

Last thing I'd like to mention here and I'll be short on this here because others have talked about it. The entire dEIS, and specifically the wildlife section as well here, is giving short change to the concept of climate change and what this is going to do, being the largest coal mine in America, and the release of carbon in the atmosphere. I could go on for hours about the impacts of climate change on wildlife here on Montana. I don't necessarily need to now, but rest assured, just about every critter, even critters that we thought were super adaptable. There are studies now showing elk, which is one of the more adaptable critters we have, but the droughts in northern Wyoming ... There's actually one study from University of Wyoming showing even elk are having problems caused by climate change and the quality of forage associated with it. Look at other species that are less adaptable: mule deer, pronghorn, sage grouse, on and on and on. Climate change is going to be a major factor.

I'd like to thank you here. Once again, I think it's quite obvious that the no action alternative is what the National Wildlife Federation suggests.

Mary Laporte

605 South 2nd Street West, Missoula, Montana 59801

Thank you. Good evening. My name is Mary Laporte. I live at 605 South 2nd Street West in Missoula. I am also a member of Montana Elders for Livable Tomorrow, MELT, which has been very involved in this. There are some of our members here tonight.

In addition to personally experiencing being woken up in the middle of the night with the existing trains that I hear out my window, and the just appalling notion that this number could be doubled, I had an opportunity on a beautiful spring Sunday afternoon to do some canvassing with Nick Engelfried from Blue Skies Coalition up on some of the northside neighborhoods. We knocked on doors and talked to some of the residents there who are really literally looking at coal trains right across the road from them, and there's a lot of concern there.

I remember one gentleman who I spoke to said that he was not sleeping at night. He was hoping that he would be able to move out of his apartment. He pointed out that his apartment building is already suffering the impacts, structural damage from the vibrations from the trains. There were cracks in his walls. He was just vitally concerned about the prospect of more trains.

At MELT, we've been really concerned about the health effects. Maybe it's possible to play down the coal dust with the surfactants, and the denial of coal dust, but the diesel fumes are a huge problem. It's been mentioned earlier tonight and it's in a lot of literature. It's known that an increase in train traffic means more diesel fumes.

Diesel fumes contain particulate matter, benzene, and other particulate matters that are known to cause cancer. Particulate matter, 10 microns or less in diameter, are directly linked to health concerns. Diesel fumes contain 2.4 microns in diameter. While those chronic effects everybody, the young, pregnant women, the elderly are at extreme risk with this.

Dr. Paul Smith is a member of MELT and is active around town. He's a pediatric pulmonologist. He has spoken very eloquently about the number of children that he's seen that have asthma, and the calculation that one in every 12 children are affected by asthma. It's occurring even in the pristine state of Montana, that we're sort of on par with states with high coal industry in Appalachia, and he's very concerned about this.

Then finally, I'd like to quote another member of MELT, Bill Ritchie, who's in the Coal Road to China film. He made a very telling statement when he said that: "The coal trains or increased and coal production, they might produce jobs, but most of those jobs are going to be in the health care industry."

I would like to urge the Surface Transportation Board to take the no action alternative on approving this railroad.

Thank you.

George Price

11486 MT Hwy. 200, Dixon, Montana 59831

Thank you for this opportunity. My name is George Price. I live on the Flathead Indian Reservation, lived there for the last 30 years. I have been a teacher all of that time, 10 years as a high school teacher, three years at Salish Kootenai College, and the last 17 years in this wonderful institution right here [University of Montana] in Native American Studies and History.

I was asked to come here by the organization I belong to, the Indian People's Action of Montana. We don't speak for all native people of tribes everywhere, but we represent people from the seven reservations and 12 tribes resident in Montana. I speak for this organization, Indian People's Action, I speak for myself, and hopefully speak for life and love on earth, the living mother and all the biosphere of the earth. I hope to speak for her and all life here.

For Indian People's Action, it's a social justice and earth justice organization, and I help coordinate a lot of the environmental justice and protection activities and actions that we take. For that organization I speak to no action, STB, on this alternative.

For myself, I also hold that position, but I'd like to go directly to the larger reason, the climate. There are a lot of excellent presentations on the local Montana-based issues and the scientific issues known to everybody, the health effects, which we shouldn't have to say to everybody over and over again. That's known.

I'd like to speak for what's often unsaid, that this is much bigger than one state and affects all. My position is that it's not a money issue. If we measure this in terms of dollars and cents, we miss the whole point. There was some testimony in the film tonight from people whose ancestors have been here, farming and ranching for three or four generations, a hundred years. I don't take that lightly. That's a deep relationship, and it's an ongoing relationship.

As Indian People's Action, we speak for people whose roots are thousands of years here, and lived 900 years without currency, without money, with a direct relationship with the earth.

I would like to say in closing that if you begin this fight against the earth from the premise, "let's see if we can first maintain our way of life and all of our consumption and put band aids on the situation that will allow us to do that", then we're sunk. We have to think of earth first and all the beings that share it with us.

Thank you.

Jeff Smith

105 Channel Drive, Missoula, Montana 59801

My name Jeff Smith. I'm the co-chair of 350 Missoula. I live at 105 Channel Drive in Missoula. The Surface Transportation Board misanalysed the cumulative environmental effects. To its credit, it recognized in the EIS that "greenhouse gas emissions have a uniform impact on global warming, regardless of where emissions occur." The Board was right on track, railroad track, so to speak. Because it recognize that the Otter Creek coal transported to China has the exact same adverse effect on our climate as the coal burned close to home, at Colstrip, say.

But the Board concluded that the Tongue River Railroad, together with its twin, the Otter Creek coal mine, "would have negligible positive impact to a miner adverse impact on greenhouse gas emission." I think that language means it wouldn't increase carbon emissions.

How can you build a new railroad and a new mine, the largest in Montana, and not increase global carbon? Easy. The Board bases this reprehensible conclusion on its economic analysis. The Otter Creek coal will displace the coal being mined at other Powder River Basin mines.

This is a magic formula. They say there will be no increase in coal production. In my mind, this renders the entire Environment Impact Statement a suspicious document. UN economist Tom Power, when he looked at the same market data, concluded that the Tongue River Railroad will send coal from Otter Creek to China. The railroad and mine will pour 1.5 billion tons of new carbon dioxide in to our atmosphere.

At the very least, the Board needs to update its economic study in light of Dr. Power's work. It needs to include an alternative that analyzes the likelihood of export to China. Until it does so, it should choose the no action alternative and keep the coal in the ground. The latest intergovernmental poll on climate change, the Nobel Prize winners, which included Steve Running who teaches here at the university. The latest report warns that our profligate burning of coal will trigger an "abrupt or irreversible tipping point" if we don't stop. Tipping points in runaway global warming are what keep all of us at 350 Missoula up at night. It astonishes us that the Board has figured out a magic formula to completely ignore them.

This is an immoral act, ignoring the new carbon bomb at a time when all the data is clear, that this railroad and this mine will lead to a disaster for our children and grandchildren. The United States must transition into a new carbon-free electrical power economy as rapidly as possible. We have the technology. We have the money. We have the workers to build a no carbon alternative to these incredibly destructive new railroads, new coal mines, and Asia's new coal-fired power plants.

The Board needs to include an alternative that fully describes a massive Rosie the Riveter World War II style transition from fossil fuel generators to wind, water and solar energy. Until the Board adds this alternative, it should choose the no action alternative, and keep the coal in the ground, which brings to my last point.

For the sake of argument, let's assume the Board's economic analysis is correct, that Otter Creek coal will displace Powder River Basin coal and be sold to plants within the eastern United States, or even at Colstrip. The Board says for every ton of Otter Creek coal sold on the market, other Powder River coal will not be mined in an existing mine. Nearly went for one. Otter Creek coal will be mined. Some existing job, some existing mine will lose that coal.

What the EIS is basically saying is that Union miners will lose their jobs at these other mines. The vehemently anti-union Arch Coal Company builds the Otter Creek mine. Arch Coal currently has a 3% union workforce. A federal agency should not be busting unions. The Board should include an analysis of the railroad and its effects on our existing workforce. Until it does so, we'll call this alternative U, it should choose the no action alternative, and keep the coal in the ground.

My conclusion, like Tom Powers, is that this big study is the same bait-and-switch that Arch Coal did with the Montana Land Board a few years ago. No one in his right mind thinks that Montana coal will go to the domestic market. There is no domestic market for coal. Instead, we must not build this railroad, we must choose the no action alternative, and we must keep the coal in the ground.

Claudia Narcisco

222 North Higgins Avenue, Missoula, Montana 59802

My name is Claudia Narcisco. I'm a volunteer with the Montana chapter of the Sierra Club. We strongly oppose all but the no action alternative for the Tongue River Railroad.

We are also going to be involved with the National Sierra Club and we're going to have much more in depth comments when we submit them. We are in it for the long haul and we are not giving up. That's the main thrust of what the Sierra Club has to say here tonight, even though I'm just a volunteer.

We are also disappointed that the Surface Transportation Board didn't find Missoula worthy of having our own public hearing here, that all of the hearings are in coal-friendly communities in the eastern part of state. I'm just going to put it on the record that we believe that the public involvement process has been skewed to favor coal development, as a result of where they have chose to have their hearings.

We have serious concerns about the adequacy of the analysis in a number of areas. The dEIS considers "the pacific northwest coal export capacity as reasonably foreseeable". As far as we're concerned, this is nothing more than looking backwards through rose-colored glasses.

Markets to the west in the United States do not want coal. We have our Senator Daines writing to Governor Inslee of Washington threatening him, we have a bill that was passed this legislative session funding a slush fund so that we can litigate our neighbors. So we are ready to go to war on tax payer dollars so that we can get this coal out of the ground and into the air.

The dEIS also determines that the Tongue River Railroad's proposal was economically and technically feasible. Apparently, several people have already brought this up, but they are unaware of the known fact that the market value of Arch Coal has declined from \$5.7 billion in 2010 to \$108 million, so somebody did the math on that one in December of this past year. I took that out of economics for dummies right out of the Missoulain from Tom Powers, this past week, May 29, 2015.

It ignores cumulative effects in a broad way. We were talking about the wildlife. A few years ago, we had a really bad stormy winter and the antelope were annihilated along the tracks because the snow was so deep that they kind of gravitated, and railroads really had negative effect on antelopes. I'm sure it's probably not only the mule deer, but other populations as well. They discussed nothing about this.

They also ignored the political climate in Montana. This passed legislative session, this is pertinent to the word equality, the legislature passed Senate Bill 325, and the governor actually signed it. This woman who spoke earlier, she obviously recognizes that matter.

Basically, it was introduced by labor, it was Senator Keane from Butte, Montana. I was at several of the hearings, and without exception the people who got up as a proponent for this bill were the petroleum and coal industry. All of the people present who got up in opposition

were the farmers. The Northern Plain Resource Council was well represented with their members.

Basically it allows Otter Creek to put all of its salty water into the Tongue River tributaries and thereby degrading, not only the culture and the farming land and everything, but the whole agricultural economy of that area. So this is really serious. Will there be no competition anymore if you get rid of the agricultural community? It's a big dent. I cannot believe that the governor actually signed it.

They've just been referring to water as blue gold. That's just one example and obviously, it's too late to be considered in this document, but that Senate Bill 325, we should all keep our eyes on it.

Of course, it ignores the impacts and the inadequacy of the analysis of communities along the route. Several people talked about the pollution and the noise. It does recognize that 34% of the impacts will be felt by low-income communities. That's exactly what we're seeing here in Missoula because we have a road too, which is on the north side, and that is in a low income community. It may be within spitting distance of the new College of Technology. It's right across the street. Noise pollution. How many tens of millions of dollars is the Montana tax payer putting into that facility? And then we're going to have coal trains going by like conveyor belt right across the street.

These are some of our concerns that they have not considered. They did a really poor job of assessing the impacts on cultural and historic resources. The Sierra Club contracted a prominent archaeologist to review the section 106 compliance for the document, and that is going to be something that we're going to be hanging our hat on. That is very inadequate. I'm not going into details here, but the quality and the quantity of what the contractor from the dEIS did in the area is seriously wanton and this is a requirement of law.

We're hoping that is a big deterrent for them and they're going to have to go back to the drawing board. Nobody talked about weeds, spread of weeds by the railroad. That's another fact of cumulative effects that was not considered. As a former president of Local 60 multinational federation of federal employees here in Missoula Montana, we have 600 bargaining union employees. I have in the past written two letters to the editor, but I'm really disappointed that labor in Montana is so pro-coal.

Jeff just said something about the 3% union in coal. Arch Coal, a few years ago, joined with Peabody and they spawned something called Patriot Coal. Anyway, they know that they're not representing labor in joining with Arch, and Patriot Call tried to get rid of all the benefits for the labor. Even Peabody negotiated a settlement. Arch just dug its heels in the ground.

Brad Stacey

21 Sunrise Drive, Plains, Montana

Brad Stacey. I live at 21 Sunrise Drive, Plains, Montana. Plains is a very nice quiet town. The railroads are definitely the main noisemaker around. Well over 90% of scientists that study the atmosphere tell us that global warming is human caused and it's going to get worse.

To mine this coal and to burn it is betting against the statement of this overwhelming consensus. This is a very bad bet. This bet holds our land, children, and grandchildren as collateral. To mine this coal is to say that 90% plus scientists are wrong. If they are right, our land, children and grandchildren's well being will be badly compromised.

Linda Holding

PO Box 812, Arlee, Montana 59821

I'm Linda Holding from Arlee. The Tongue River Railroad is another step in the intent to move around citizen protest over continued development of coal instead of investing in renewal energy. Earlier, the Montana Legislature apportioned \$1 million to fight environmental protest for a possible coal export shipping site on the West Coast.

Railroad building and corrupt politicians was how the West was run in America. I understand all this. But hey, that was in the 1800s, and this is 2015. We now live in a transitional time in history toward renewable energy. The fundamental "hooey" proposition that Montana needs to mine this coal is based on providing construction jobs and tax revenue.

The downturn in oil price and the layoffs of workers, 9,000 by Halliburton alone, is proof that carbon-based energy companies do not provide the solid base of the economy they once did. I thank all companies for all they're providing for the economy.

The tax dollars Montana would see from Otter Creek would soon be swallowed up in the cost the state tax payers would pay to reclaim what remains in Otter Creek and the Tongue River after the coal companies leave. And leave us behind they will, that is a solid Montana tradition.

When I Googled the proposed Tongue River Railroad on Wikipedia, this is what I found: "These coal deposits are sufficiently thick, and are located under sufficiently thin overburden - that's the agricultural land - as to be economically viable. Drawbacks for production are the lack of a rail spur to transport the coal, and the lack of an established community of sufficient size to support the work force."

In other words, a railroad is being proposed for a mine that is economically viable only to the company that operates out of state and is ill-prepared to provide housing, food and other basic necessities for a workforce. A community like Ashland surely does not want to be turned into man camps, a platform for the sex trade, and limits to the roads, sewer, water and schools being compromised.

Speaking of reclamation, what does a community do after it's been invaded by a coal company and abandoned? The legislature set no money aside for the destroyed farms, ranches, and small communities around the Tongue River and Otter Creek. They pose another truly important issue to build in a railroad in the Tongue River Valley. It is the valley itself. The Tongue River Valley is one of 42 important bird areas in Montana. It is part of an international program to protect declining species of birds and their habitat.

The bottom of the valley is Whir rain forest habitat. Trees like willows, cottonwoods and ash grow there providing nesting and resting sites for over half of the bird species that traditionally nest in the state. This is why rain forest habitat itself is rare in a state that gets less than 12 inches of rainfall a year, and it's why they're so important to protect.

Coal use in the United States is in decline. If renewable energy would get the tax breaks and subsidies that coal and oil companies receive, jobs would flood the market both in construction and high-tech. President Obama has declared global warming as the most critical issue facing the world now. Not in the future, but now.

Why should the state of Montana continue to support a carbon-based energy system and increase our carbon footprint when the future is in renewables? Do not build the Tongue River Railroad, and stop expanding coal mines through our land.

Simon Bazard

My name is Simon Bazard. I'm a recent homeowner in Missoula in the Lower Rattlesnake, so across the tracks. I have lived in that area for three years and I've had direct experience with increased coal traffic coming through Missoula. I thank the organizations, those guys, the Northern Plains Resource Council, and 350 for organizing this and giving us a chance to have public comment to the Surface Transportation Board.

I think, as everyone else has said, a lot of other voices have really documented and explained the real arguments for not building the Tongue River Railroad. Additional coal mines would have detrimental climactic effects. Climate change is already proving to be much faster and much more evident than I think anyone could have imagined, and the impacts are very much felt already in Montana and globally, the detrimental impacts of the railroad and the coal mines in the Tongue River.

Specifically, I really urge the Surface Transportation Board to take the no action alternative, mainly because the draft EIS does not adequately address the potential harmful effects of increased coal traffic through communities in Montana. That's something that's very specifically missing from the draft EIS.

It's something that we can point to directly and say that this is not an adequate document, and it hasn't been an adequate procedure to say that the largest proposed coal mine in the United States won't have detrimental impacts on communities where the trains pass through. It's bogus.

I really encourage the Surface Transportation Board to reevaluate and reassess the potential impacts and harmful effects that increased coal traffic will have. I wish them good luck and hopefully we can all hear what they find.

Suzette Tusso

Good evening. I'm Suzette Tusso. I am a resident of Missoula. I have been here all my life. I just want to say thank you to my friends and neighbors who are showing up, for speaking up as we have done many, many, many times over the years to protect our state that we cherish because we realize what a treasure state it is. Also, for our beautiful community which will have detrimental effects from the result of coal mining in eastern Montana.

Many of us had been showing up, speaking up, working, fighting, petitioning, protesting, marching, walking, abstracting vehicles to protect our beautiful state. For years, we have asked, we've wondered, we've questioned why do we continue to follow down this path of such a destructive path of our world and why we do not develop cleaner alternatives for energy. We have asked this question for years.

I recognized that coal is an archaic source of energy production. It has polluted our air. It has destroyed our landscape. It has destroyed our communities. It has sickened our people from its inception, not only in the United States but also across Europe and across the world.

In Montana particularly, this particular project will destroy native Montana habitat that is precious to our state. It will destroy our groundwater resources that are essential to farmers and our communities. It will destroy native cultural and heritage sites. It will destroy part of who we are as a community across the state. It will impact many, many people across the state from the residue of the coal dust traveling through the communities.

Who is to gain, who is to profit from this? It is not the people of Montana. It is those that are very wealthy, those that are very powerful and that continue to hold Montana in a copper collar as they have done since the days of the copper kings. Of course, we Montanans stand up and we say no more and we have won many, many battles.

I encourage you as the national Surface Transportation Board to recognize the folly of this project, to recognize the harmful effects that it will have not only on our state, but on our nation, on our world, and to please do not approve this project. Say no to the approval of the Tongue River Railroad.

Thank you for allowing us to have this opportunity to visit with you and we will of course invite you to our beautiful community, to our beautiful state to see for yourself what we are fighting again for.

Thank you.

Nick Engelfried

321 South 1st Street West, Missoula, Montana 59802

My name is Nick Engelfried. I live in 321 South 1st Street West here in Missoula. I'm organizer with both the Blue Skies campaign and 350 Missoula. I want to urge the Surface Transportation Board to choose the no action alternative, do not approve the Tongue River Railroad.

I specially want to object to them not taking into full consideration the impacts that this project would have on communities like Missoula, up and down the rail line, and ignoring those impacts in their draft EIS.

Here in Missoula in particular, our city council passed a resolution and sent a letter to the Surface Transportation Board specifically requesting that they hold a public hearing, an *official* public hearing here in Missoula, so that folks here would be able to speak directly to the Surface Transportation Board. Our hearing today is kind of our back up next best option since they didn't decide to hold an official hearing here.

The county commission, the Missoula County Commission, also requested that there'd be a hearing here. Several of our state legislators representing districts in Missoula made the same request, as well as lots and lots of citizens. To me it seems like considering the amount of interest here in this community, considering the number of officials, lawmakers, and homeowners, people who have spoken up, the Surface Transportation Board should have held an official public hearing here, but at the very least they should have been there drafting Environmental Impact Statement giving full consideration to the impacts that coal trains would have on this town.

I also just want to say that myself and another volunteers with Blue Skies and 350 Missoula had been out in downtown Missoula during Saturday markets and many other days of the last month or two inviting people to submit written comments and post cards about the Tongue River Railroad. The vast majority of the people who stopped by our table and take the time to learn about the issue are very concerned about having more coal trains come through, very opposed to the idea of making us more dependent on coal. I think that there is a lot of concern in this community and it's very evident.

Since the Surface Transportation Board didn't hold an official hearing here, some of us from 350 Missoula are going to be traveling out to the official hearing in Miles City next week and we will be bringing with us comments that we've been collecting downtown, comments collected here at this hearing, and we will make sure that this get presented directly to the Surface Transportation Board folks.

Thank you all.

Linda Smith
545B Missoula

My name is Linda Smith. I live at 545B Missoula. When you think about making a list of who benefits and who bears the cost of coal development Montana, it's very clear that all Montanans will be negatively impacted ultimately. If coal development takes place, agriculture, Montana's number one economic generator, will be harmed short-term in the Tongue River Valley and surrounding area and long-term state-wide, as the effects of bringing the coal exported to Asia come back to Montana as air pollution, contributing to climate change that will cause more extreme weather events, prolonged drought, flooding and more wild fires.

The coal companies have said that they intend to export more coal to Asia from ports along the West Coast. People living in communities along the rail lines will be most directly affected through exposure to higher levels of diesel fumes, coal dust and noise of frequent trains, lack of access to emergency services which are all associated with developing long-term chronic health problems caused by having to breathe polluted air.

Children are the most vulnerable to having their lung development compromised by breathing polluted air. The state may receive some benefit from taxes paid by coal companies but the state is responsible for the health of the well-being of its citizens and will have to put money into caring for Montanans made ill from coal development.

Some jobs will be created if this rail line and ports are built and coal extracted, but they won't be long-term. Nor the kind and quality of good paying jobs needed to build healthy communities and stable families.

Our current congressional elected officials have knee jerk reactions to any projects that claims to create jobs no matter the kind or quality. By supporting coal development, they are supporting the private profit interest of the private sector, coal executives and investors at the expense of the interest of most Montanans who care deeply about the land, people, and wildlife of Montana having access to clean air and clean water as guaranteed in Montana's constitution.

I urge the Surface Transportation Board to adopt the no action alternative.

Rita Jankowski-Bradley

510 East Kent Avenue, Missoula, Montana

My name Rita Jankowski-Bradley. I live at 510 East Kent Avenue, Missoula. I'm a member of Community Action for Justice in America's African Asia and we frequently collaborate with Blue Skies campaign because we really believe in the work they do.

All my professional life I worked in healthcare, in many diverse settings. In the area of public health, I served on the county board of health in Butte, Silver Bow along with the pediatrician co-chair the low lead advisory committee and served on a state lead advisory committee. Lead found in coal dust as well as for mining activities is the significant public health issue.

Coal trains along the rail lines where families live pose real health threats in terms of coal pollution, diesel fumes, and from diesel exhaust loaded by trains and also noise pollution. Coal dust particulates contain heavy metal toxic at low levels such as lead, mercury, nickel, tin, cadmium, antimony, arsenic, as well as radio isotopes with polonium and strontium.

These metals had been identified as causing neurological problems in children as well as cancers, birth defects, and other ailments. These fine invisible dust particles, which are less than 2.5 microns can be extremely dangerous as they can be inhaled and lodged more deeply in the lungs where they cannot be expelled. Therefore, long-term exposure increases the risk of health problems.

Epidemiological research suggests there's no threshold that it is safe to breathe coal dust. This conclusion is supported by the World Health Organization and several research studies. In addition, the World Health Organization considers diesel exhaust a carcinogen and the soot from diesel exhaust can worsen lung and cardiovascular disease and has been linked to asthma as well.

In 2009, a representative from BNSF, a rail company, testified before Federal Review Board that 645 pounds of dust escapes from each coal train during a 400 mile trip. Since his testimony, coal companies have been required to apply surfactant agent to the trains before they leave the mines. This is supposed to keep 85% of dust from escaping, yet 15% remains or approximately 97 pounds per car.

The Sierra Club contends that surfactants don't ensure that coal dust won't escape and that chunks of the topsoil can fall off during transport. The coal companies basically is telling us that they don't care about the health impacts of the remaining 97 pounds of coal dust from each car, which are serious. They have chosen not to cover the trains as well.

Public health officials in Washington and Oregon states have raised concerns about coal dust and called for more sampling research and monitoring. Wind, rain and hot weather all play a role in how the dust behaves.

The director of the Renewable and Appropriate Energy Laboratory at the University of California Berkeley said, "We are seeing significant health and ecological impacts in coal

intensive regions. Evidence about human health effects should be used to help determine the true cost and benefits of different energy technologies. The social cost of carbon should be weighed heavily when developing policies governing the mining, transport, and use of coal. This is pure and simple,” he said.

The state of Montana should address these concerns regarding severe adverse health impacts and environmental as well before allowing the mine project. The Surface Transportation Board should hold the public hearing in Missoula as part of the review. In reality, the Department of Environmental Quality should monitor coal dust on the ground and in the air from current trains before approving any increase. In fact, monitoring of coal dust needs to be continuous and publicly available.

Coal pollution is a real public health concern. In Montana, no child or family or neighborhood should bear the burden of risk. No child is less important. We feel there should be justice along the tracks especially for the sake of the children.

Thank you.

Michael Bowles

2200 Applewood Lane, Missoula, Montana

Hello. My name is Michael Bowles. I'm a student at the University of Montana. I live in Orchard Homes District 2200 Applewood Lane. I urge the Surface Transportation Board to no action on any further developments on this coal project because we're at a time of history where we need to be transferring over to renewable energy and doing away with fossil fuels.

I'm really glad I came here because I learned a lot from all the community members who came. I look forward to the next meeting we have together. Thanks.

Ellen Knight

5800 Rattlesnake Drive, Missoula, Montana

My name is Ellen Knight. I live at 5800 Rattlesnake in Missoula. I've been concerned about energy issues for about 40 years. Particularly on this issue, I've been concerned and active in addressing the issue of coal trains coming through the town and many towns along the proposed route.

It seems to me that a huge cost has been left unaddressed, at least by Arch Coal and the railroad. That is they plan to leave the cost of delays and safety delays by trains crossing the tracks to people. Most of us who need to cross tracks, if the fire trucks or the ambulance needs to come, we are the ones who pay the cost.

I think the Surface Transportation Board shouldn't, in some dismal state of mind, allow this. At least charge Arch and the railroad companies for the cost of underpasses and overpasses in every community. I think that's a big cost.

Also, I want to say that the dEIS is obviously really badly done. In spite of that, I worry that they might allow these tracks and I want to urge the Board to be honest and courageous in the decision you make, and if you do that, I don't see any way that you could approve this railroad.

Jim Roach

4720 Humble Road, Missoula, Montana

My name is Jim Roach. I live at 4720 Humble Road. I want to echo everything that was said here tonight. It seems like we all can see what the climate is doing and we think that this development would be going in exactly the wrong direction. Please go against it and please hear what we have to say and please take that into consideration.