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Submission Text

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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've 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.