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Date: 05/21/2015 09:03 AM
Subject: Tongue River EIS Request for 120 day extension of time for comments

RE: REQUEST FOR 120 DAY EXTENSION OF TIME TO RESPOND TO DRAFT EIS

Dear Ms. Rutson:

I request a 120 day extension of time to address this very, very long Draft Environmental Impact Statement. It has many deficiencies and errors.

Further it fails to address many obvious issues. For example, it does discuss the impacts of the Tongue River Railroad on "15 downline segments of the existing rail network between the proposed rail line and the Central and Upper Midwestern United States" but does not discuss the impacts of the Tongue River Railroad on downline segments of the existing rail network between the proposed rail line and the West Coast of the United States where the coal actually will be shipped for further shipment to Asia the market for coal from the Otter Creek Coal mine.

The Big Sky Business Journal reported

"Construction of the Otter Creek coal mine would significantly boost Montana jobs, household income and tax revenues as the Asian demand for the resource expands, according to an economic impact study conducted by economists Patrick Barkey and Paul Polzin of The University of Montana Bureau of Business and Economic Research. BBER director and study co-author Barkey notes that though domestic markets are unlikely to provide significant growth for Montana coal, demand in China is projected to swell rapidly and drive Otter Creek's fate."

"The anticipated increase in coal demand in China between 2010 and 2035 is more than twice the current U.S. production of coal, and Southeast Asia does not have sufficient capacity to satisfy this growth," Barkey said.

"Because Montana coal fields are closer to Northwest ports than those in Wyoming, Montana has a geographic advantage in serving fast-growing Asian markets."

The market for the Otter Creek Coal Mine is in Asia. The Wyoming legislature just authorized the issuance of one billion dollars worth of Wyoming state bonds to build coal ports on the West Coast. The Attorney Generals of both Montana and Wyoming have announced that they would sue if the States of Oregon and Washington did not authorize coal ports to ship Powder River Basin Coal, including coal from the Otter Creek Coal Mine, to Asia.

Coal from the Otter Creek Mine will go to the West not to the East. The impacted communities from the coal trains that go down the main BNSF line from the Tongue River Railroad are Billings, Livingston, Helena, and Missoula and not Miles City, Forsyth, or Fargo.

The Draft Environmental Impact Statement took 30 pages, the result of two years of work, to discuss the downline impacts of the proposed railroad on segments of the existing rail network between the proposed rail line and the Central and Upper Midwestern United States. It will take me at least 60 pages, the result of several months of work, to discuss downline segments of the existing rail network between the proposed rail line and the West Coast.

It would be a violation of due process not to allow me this 120 day extension to adequately respond on just this one error in Draft Environmental Impact Statement

Thank you.

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