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Submission Text

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Good evening, my name is Ed Gulick. I live at 3015 10th Avenue North here in Billings. Regarding this draft EIS from the Surface Transportation Board for the Tongue River Railroad, I think they should be extremely embarrassed and ashamed that they would actually put out this tripe. I mean this is clearly very poorly drafted and it's one of two things: either they don't have a commitment to the truth, or they are inept. There's not a scholarly process that's followed, so it's one of those two things.

There's been economic analysis to demonstrate that there is no domestic market for this coal that has a very high sodium content. It's already been filled somewhere else, nowhere is that mentioned in this draft EIS. So already out of the gate, it's kind of absurd. But there has been, even by Arch Coal's admittance, there is a market in Asia. It's clear this is supposed to be sent there, so it misses again. So it's going through Billings then if it's going to the West Coast ports, and no mention of the impacts in Billings. I will mention just a couple of them, many of those have already been mentioned, but I live on the north side of the railroad tracks, I work on the south side, so I will be crossing the railroad tracks multiple times per day. There are costs in terms of my lost productivity waiting for trains. There are also the health and safety aspects; my office is within 150 feet of the railroad tracks. Again, those impacts are not addressed in here but there are again, numerous air quality public health issues as well as safety that at least need to be mentioned, and they are not mentioned in this draft EIS.

As an architect, I work on a lot of projects in the redevelopment of downtown Billings. That totals, in terms of past, present, and future projects, in the tens of millions of dollars and maybe even getting into the hundreds of millions of dollars. All those projects are jeopardized if you have the gates down at the train crossings for an additional three hours, maybe up to ten hours per day. All those are impacts that Billings will see, they're not addressed in this draft EIS, and they need to be going back to the drawing board. But if they insist on using the different options they've laid out, no action would be the best one to take.

Thank you.