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January 17, 2014

Ms. Victoria Rutson
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

**Re: STB Finance Docket No. 30186, Tongue River Railroad Company, Inc. – Rail
Construction and Operation – In Custer, Powder River and Rosebud
Counties**

Dear Ms. Rutson:

Enclosed please find a memorandum that describes some minor revisions to the Tongue River Railroad Company's ("TRRC") preferred alignment (the Colstrip Alignment) in the above proceeding, together with a series of maps which illustrate the revisions. These revisions are being proposed as a consequence of further engineering study and analysis that has been conducted for TRRC. As described in the memorandum, the revisions result in reduced environmental impacts of various sorts, including less required earthwork and fewer road and stream crossing impacts.

Please let us know if you have any questions about the enclosed.

Sincerely,



David H. Coburn
Attorney for Tongue River Railroad Company, Inc.

January 17, 2014

MEMORANDUM

**To: Vicki Rutson
Ken Blodgett
Office of Environmental Analysis, Surface Transportation Board**

From: Jamie R. Hamm, P.E., TranSystems

Cc: Alan Summerville, ICF

Re: F.D. 30186, Tongue River Railroad Project: Summary of Engineering-Based Revisions to Proposed Colstrip Alignment

As a result of further engineering work and analysis, Tongue River Railroad Company, Inc. ("TRRC") has decided to make several horizontal design changes to its preferred Colstrip Alignment from the originally proposed Colstrip Alignment submitted by TRRC at the time of its December 17, 2012 Application. A series of maps displaying the changes are attached. The map labeled Exhibit A shows and describes the more significant changes, which are described below.

The changes proposed here are intended to voluntarily mitigate certain impacts of the original alignment to streams, residences and road crossings in the area (as described further below), while significantly mitigating the earthwork impacts of the Colstrip Alignment. As a result of the modest changes to the alignment proposed here, the total volume of earthwork that would be required for the Colstrip Alignment is reduced by a total of about 1,100,000 cubic yards. Notably, the originally proposed Colstrip Alignment already required substantially less earthwork than any of the alternatives under consideration and the revisions here will provide Colstrip with an even bigger advantage. Likewise, Colstrip will (as a result of the changes proposed here) have no greater number of road crossings than any other alternative alignment under review.

Only five of the revisions extend more than 200 feet from the centerline of the originally proposed alignment. These are listed below in order from north to south, starting at Colstrip (MP 0.1) to Terminus Point #2 (MP 34.9). Each of the areas in which these changes are located are depicted on Exhibit A and on the attached exhibits submitted with this memorandum. The

dimensions listed are measured from the centerline of original proposed alignment to the centerline of revised proposed alignment.

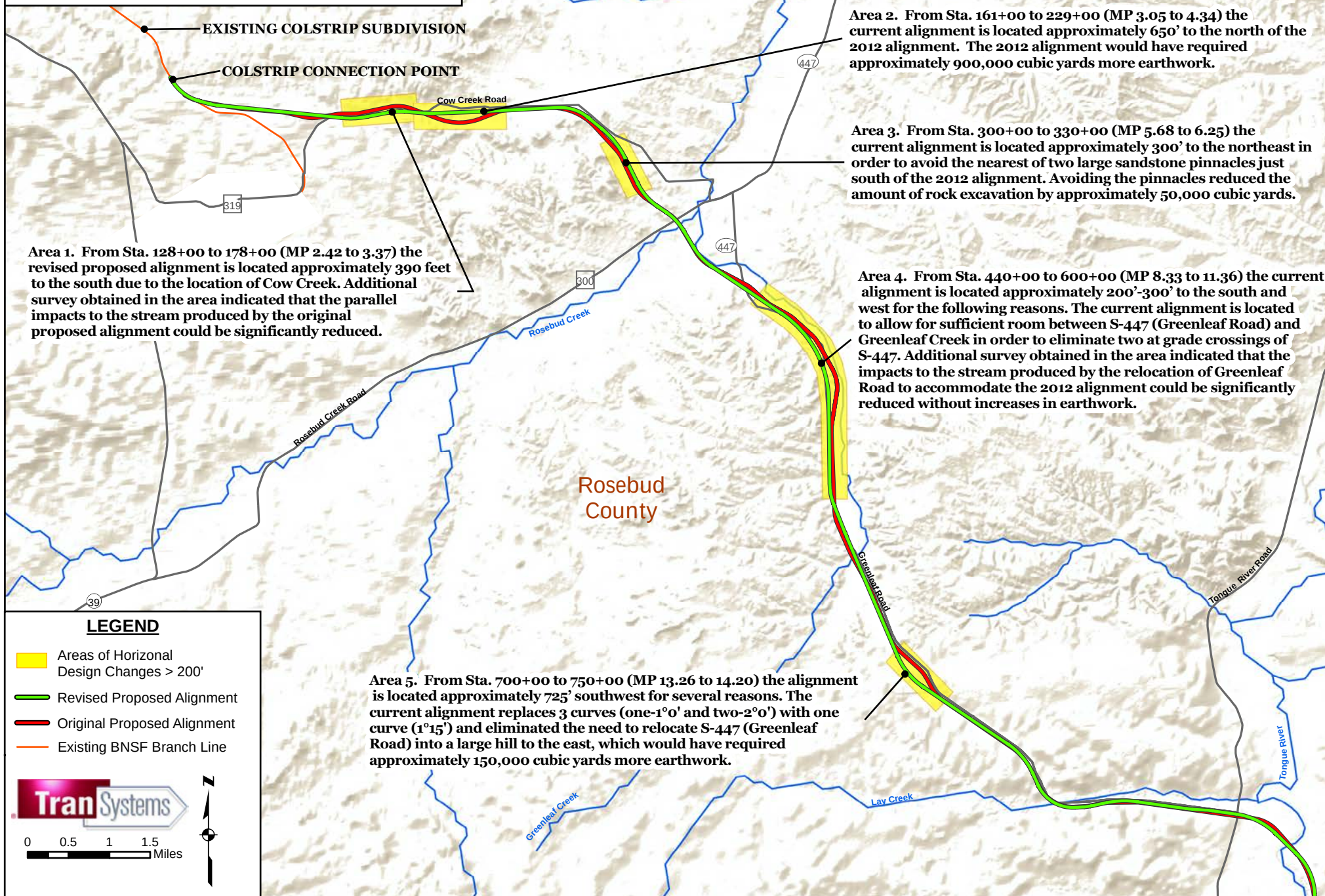
- Area 1 From Sta. 128+00 to 178+00 (MP 2.42 to 3.37) the revised proposed alignment is located approximately 390 feet to the south of the original alignment. Additional engineering survey in the area indicated that parallel impacts to Cow Creek produced by the original proposed alignment could be significantly reduced. Parallel impacts to stream channels are those where the earthwork for the proposed alignment overlaps a stream channel and its adjacent bank areas that run parallel to the alignment. This type of impact is in contrast to a perpendicular stream impact, which is more commonly addressed using a means of conveyance such as a culvert or bridge.
- Area 2 From Sta. 161+00 to 229+00 (MP 3.05 to 4.34) the revised proposed alignment is located approximately 650 feet to the north of the original proposed alignment. The original proposed alignment would have required approximately 900,000 cubic yards more earthwork than would be required by the revised alignment.
- Area 3 From Sta. 300+00 to 330+00 (MP 5.68 to 6.25) the revised proposed alignment is located approximately 300 feet to the northeast in order to avoid the nearest of two large sandstone pinnacles. Avoiding the pinnacles reduces the amount of rock excavation by approximately 50,000 cubic yards.
- Area 4 From Sta. 440+00 to 600+00 (MP 8.33 to 11.36) the revised proposed alignment is located approximately 200 to 300 feet to the south and west for several reasons. The revised proposed alignment is located to allow for sufficient room between S-447 (Greenleaf Road) and Greenleaf Creek in order to eliminate two at grade crossings of S-447. Additional survey information obtained in the area indicated that the parallel impacts to the stream produced by the relocation of Greenleaf Road to accommodate the original proposed alignment could be significantly reduced without increases in earthwork.
- Area 5 From Sta. 700+00 to 750+00 (MP 13.26 to 14.20) the revised proposed alignment is located approximately 725 feet southwest of the original proposed alignment for several reasons. The revised proposed alignment replaces three curves (one-1°0' and two-2°0') with one curve (1°15') and eliminates the need to relocate S-447 (Greenleaf Road) into a large hill to the east, which would have required approximately 150,000 cubic yards more earthwork.

Design changes on the revised proposed alignment greater than 100 feet but less than 200 feet from the original centerline are listed below:

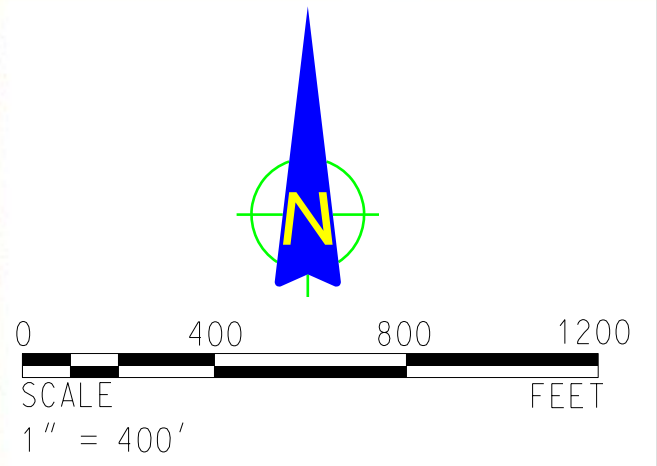
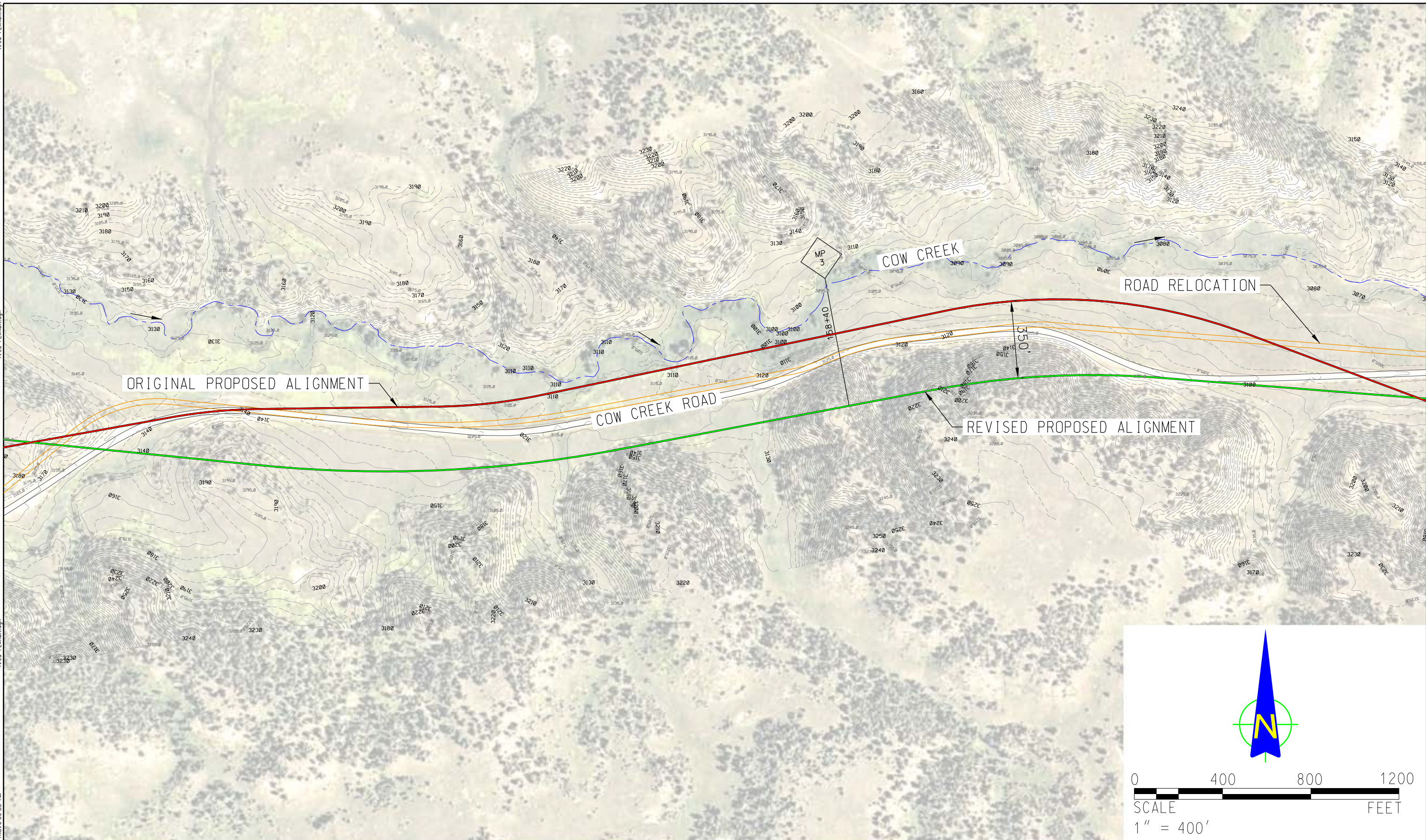
- MP 18.85 – the revised proposed alignment is located approximately 195’ feet south to increase the buffer to a residence while also avoiding the introduction of horizontal curves on the bridges over Tongue River and Tongue River Road.
- MP 24.53 – the revised proposed alignment is located approximately 115 feet east to increase the buffer to a residence.
- MP 26.69 – the revised proposed alignment is located approximately 175 feet south to avoid a large cut and increase the buffer to a residence.
- Terminus Point 1 Spur MP 2.46 – the revised proposed alignment is located approximately 170 feet east to avoid relocating Tongue River Road in a manner that would impact a residence.

TRRC is prepared to answer any questions that OEA or ICF might have on this matter and to supply additional data as may be requested.

EXHIBIT A PROPOSED TONGUE RIVER RAILROAD ORIGINAL TO REVISED PROPOSED ALIGNMENT CHANGES > 200'

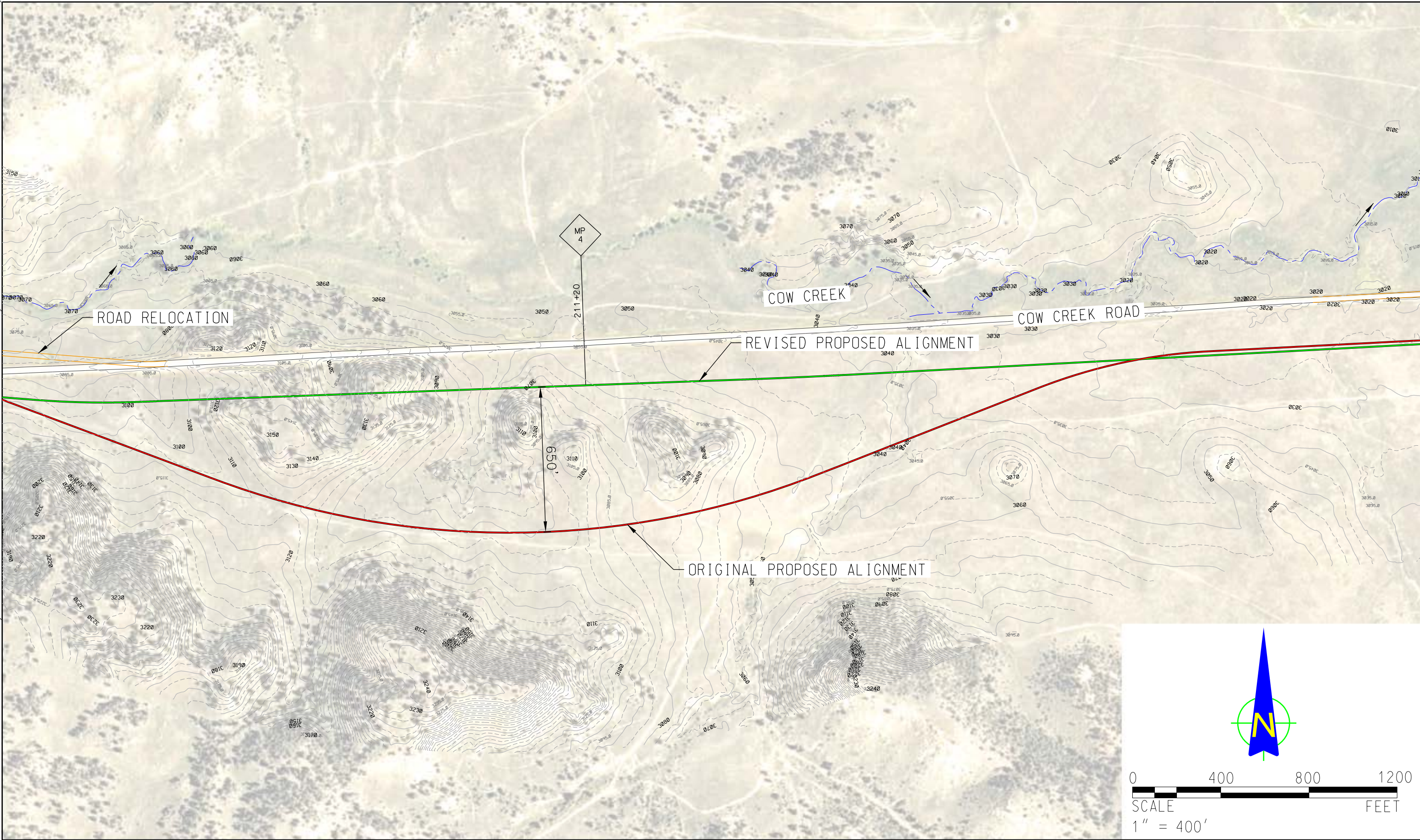


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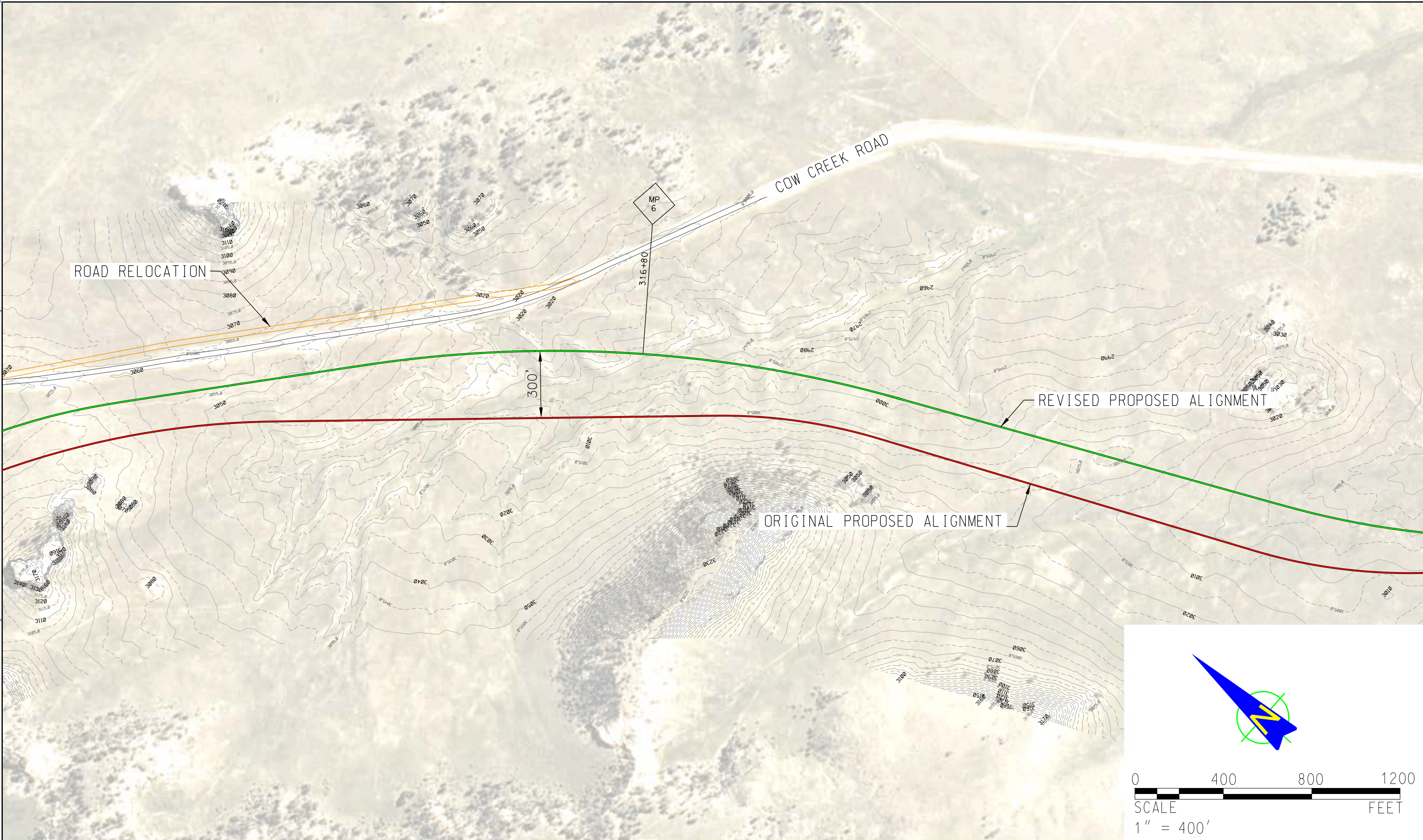


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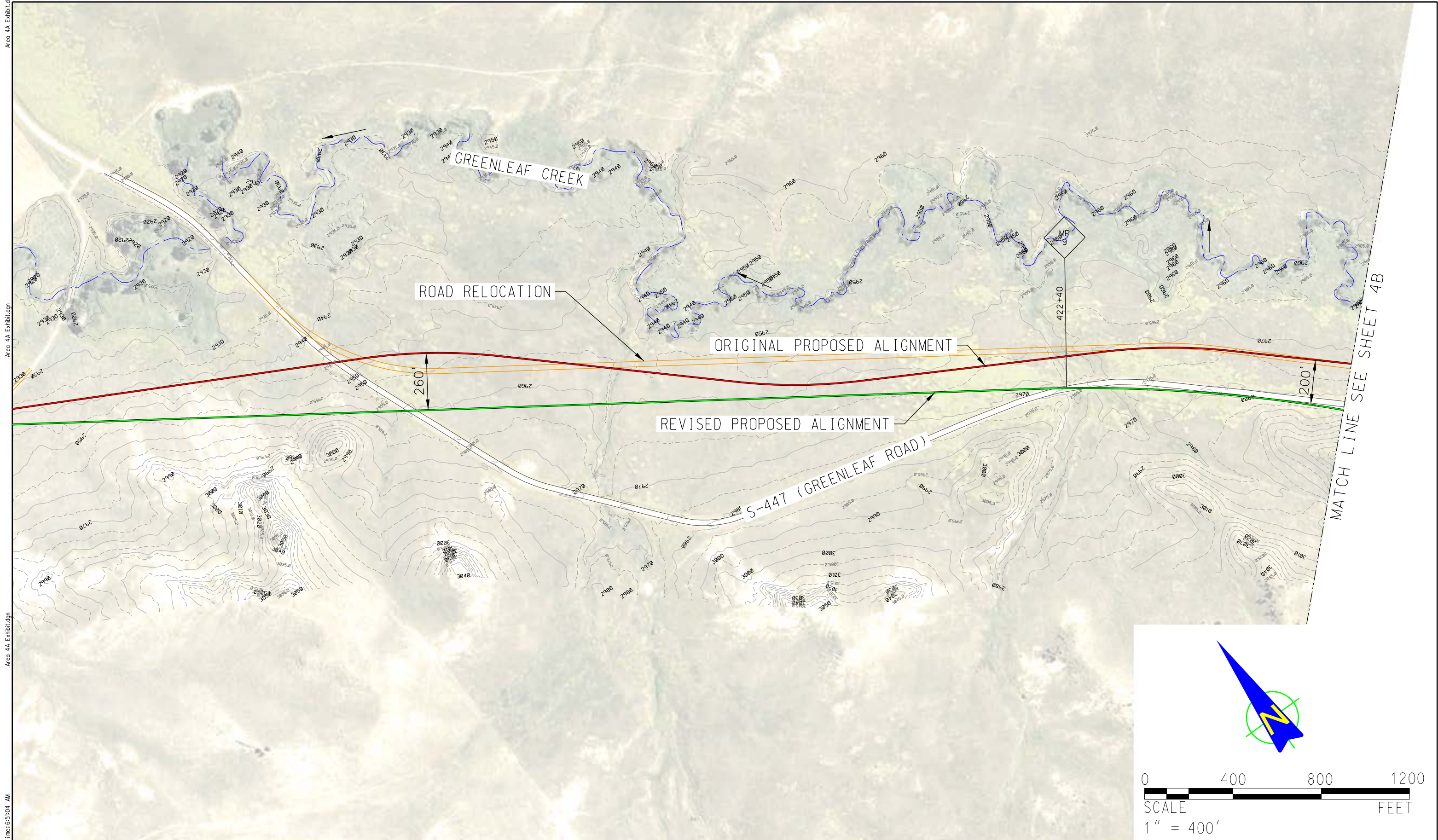
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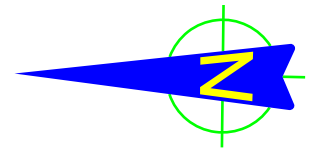
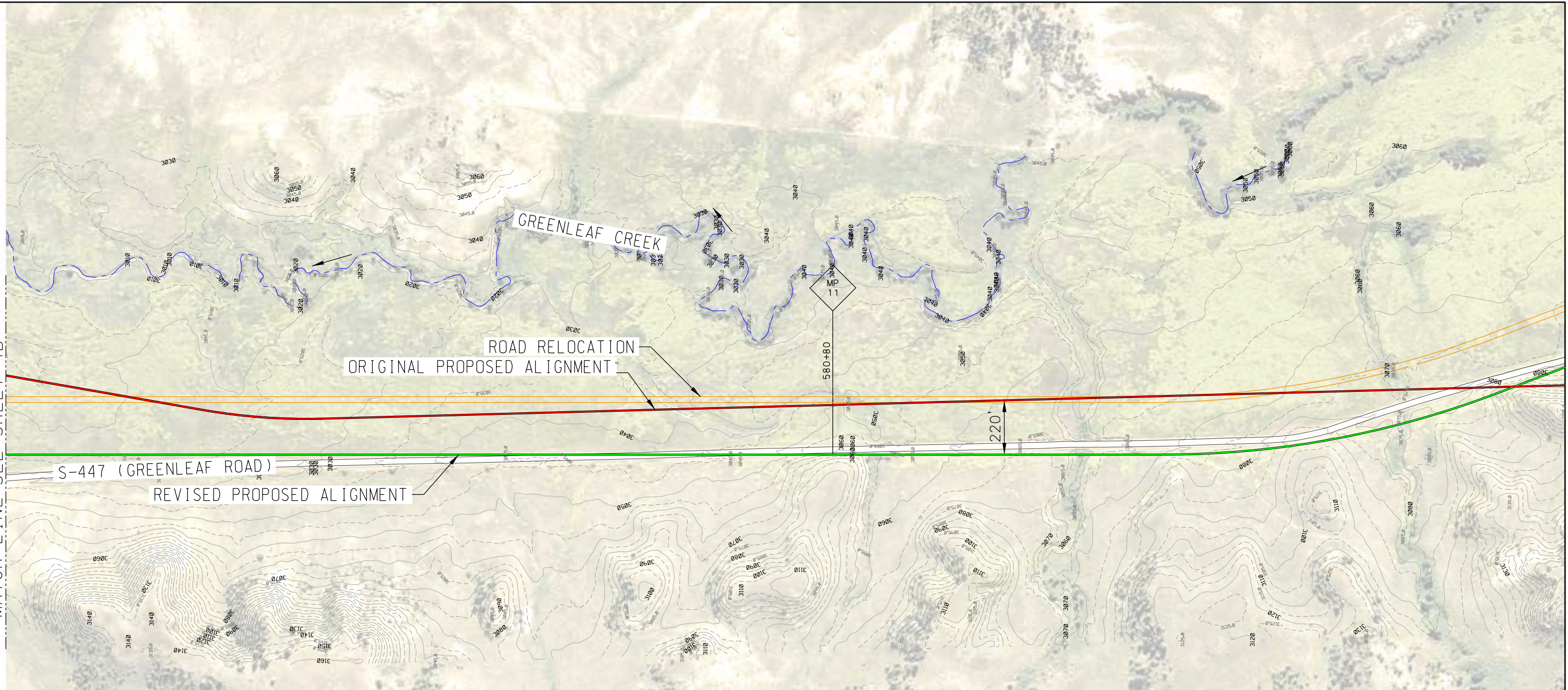


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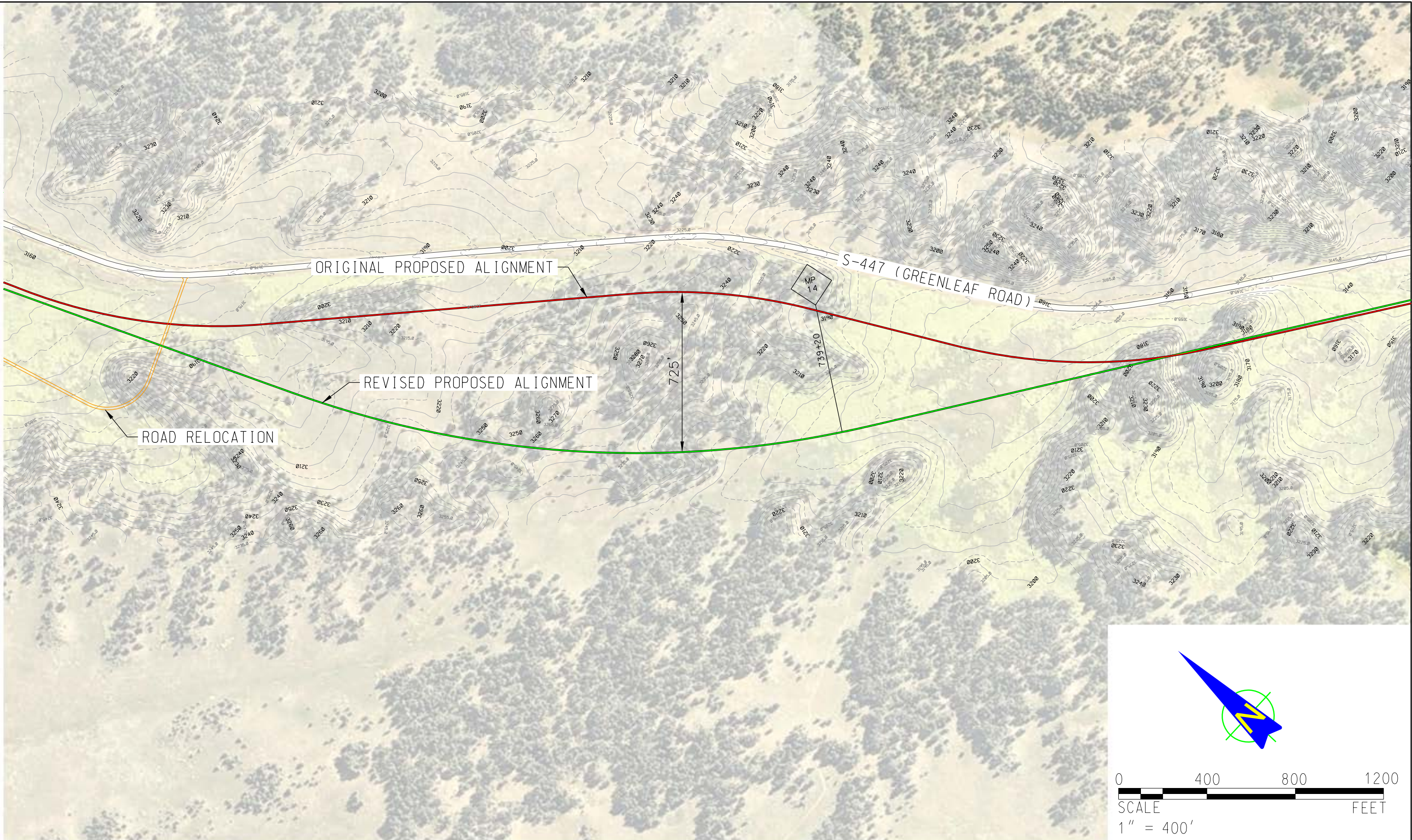
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