

Submission Number: *FD-30186-000009*

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Commenter: Jenny Harbine

Organization: Earthjustice

State: Montana

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

Please see the attached request for a 60-day extension of the draft EIS public comment period.



April 27, 2015

Ken Blodgett
Attention: Environmental filing, Docket No. 30186
Surface Transportation Board
395 E. Street, SW
Washington, D.C. 20423

By email to blodgettk@stb.dot.gov and online at www.tonguerivereis.com

RE: Docket No. FD 30186 – Tongue River Railroad Draft Environmental Impact Statement,
REQUEST FOR EXTENSION OF COMMENT PERIOD

Dear Mr. Blodgett:

Earthjustice, Montana Environmental Information Center, National Wildlife Federation, and Sierra Club respectfully request a 60-day extension of the public comment period for the Tongue River Railroad draft environmental impact statement (DEIS). Currently, the comment period is set to run through June 23, 2015. Granting this request would extend the comment period through Monday, August 24, 2015 (the first business day after the 60th day).

We appreciate the Surface Transportation Board's desire to ensure robust community involvement by hosting ten public meetings (and two online sessions), and the reasonable extension we request would significantly improve the public's opportunity to fully understand the project's impacts and provide the Board with constructive comments.

The requested extension is more than justified given the length and complexity of the agency's analysis. The DEIS alone is nearly 1,200 pages, with an additional 2,470 pages in 22 separate appendices. Included in the DEIS and supporting documentation are extensive technical analyses and references to hundreds of technical and scientific reports, studies, and other documents. The existing comment period is insufficient to allow for meaningful review of this information by the public and state and federal agencies.

An adequate comment period is especially important in light of the far-reaching and long-lasting social and environmental impacts of the proposed Tongue River Railroad. Building the railroad would require condemnation of private property in the right-of-way and will sever family farms and ranches. It would be constructed in close proximity to the Northern Cheyenne Reservation in an area of great cultural significance to tribal members. Further, the railroad's purpose is to provide access to the Otter Creek coal tracts—which alone encompass approximately 1.4 billion tons of coal that will be mined, transported, and burned over the mine's 50-year lifetime—and other potential new coal mines in the Otter Creek Valley. Because of the severe and potentially permanent impacts of these activities—both local and global—the public's

interest in this project is intense and their involvement should not be curtailed by an insufficient public review period.

To afford the public a meaningful opportunity to evaluate and comment on the environmental consequences of the proposed railroad, a 120-day comment period is warranted.

Should you have any questions or wish to discuss this request, please contact Jenny Harbine at (406) 586-9699 or jharbine@earthjustice.org

Sincerely,



Jenny Harbine
Earthjustice

Anne Hedges
Montana Environmental Information Center

Garrit Voggesser
National Wildlife Federation

Nathaniel Shoaff
Sierra Club