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**Commenter:** Brad Sauer

**Organization:**

**State:** Montana

**Agency:** Surface Transportation Board

**Initiative:** Tongue River Railroad

**Submission Text**

see attachment

Mr. Ken Blodgett, Surface Transportation Board

22 Sept., 15

395 E Street,S.W.

Washington,DC

20423-0001

Attention: Environmental filing, Document Docket No. 30186

Re: Comments on Proposed Tongue River Railroad Draft EIS

In few words, the draft EIS does not adequately describe the existing environment and conditions through which the ten alternatives are proposed to pass. Because the existing environment and conditions are not adequately described, mitigation measures for impacts from the construction and operation of the proposed railroad cannot be addressed or developed if the affected environment is not adequately described. In common speech you missed a lot in your EIS.

Because the EIS neglects to mention so many elements of the existing condition it does not seem to be of the standard required by , National Environmental Policy Act.

Conformance with and/ or mention of existing land management plans:

The document fails to mention a number of relevant land use and emergency response plans from county to federal level and to describe how the railroad will affect these plans and/or comply with them.

Ranching operations:

The EIS fails to mention how many ranching operations will be affected by each alternative and how each of those ranches will be specifically affected. Specifics such as ranch infrastructure, operation, and economics were not mentioned. How many underpasses will be necessary for stock movement? To what specifications and requirements will the underpasses be built? What are the longterm changes that will occur in these operations and how will the economics of the ranching operations be affected for the following 20 years?

Flooding:

The EIS mentions the possibility of a change to how the Tongue River Floods and it's affect to Miles City. What about the communities and properties further up the river? The document only mentions a 25 year flood event. What about annual , 50 and 100 year events? How will each alternative affect these categories of flooding?

Fires:

How will the railroad affect fire starts in this fire prone environment? Where are the likely places for fire starts in each alternative which the document mentions? What is the incidence of railroad caused fire in Montana? If the right of way is fenced how will the increase in fuels available to burn be mitigated. How

will the railroad alternatives affect access for fire suppression? What are the values at risk from a fire caused by the railroad on all it's alternatives? How will compensation occur for all associated costs if a fire should be started by the railroad?

Construction: How will construction affect existing commerce, transportation, and economics. Who will pay for land taken out of production during the construction phase ? Will the tax base be affected ?

Economics:

Only county level information was cited. NEPA requires that information for NEPA documents be as site specific and current as possible.

I could go on as almost every category of the document is lacking in information.

This document is extremely flawed and out of compliance with both the spirit and letter of the NEPA act.

My opinion is that you must produce a document of significantly higher quality or expect severe challenges. Or... you could select the NO ACTION alternative, not approve the action, avoid all the work and expense ahead of you and go on about your lives. This would leave this well functioning valley and its' associated ecosystems to go on into the next century and continue to be the national and world treasure that it truly is.

Sincerely,

Brad Sauer

POB 372, Forsyth, MT, 59327