

29 Red Bluff Loop
Birney, MT 59012

Nov. 25, 2012

Kenneth Blodgett
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Attention: Environmental Filing Docket No. FD30186

Dear Mr. Blodgett:

I attended the Nov. 14th hearing at St. Labre Indian School in Ashland, at which you presided.

I endorse the No Action Alternative. The TRR's only reason for existence is to haul Otter Creek coal. The TRR/Otter Creek mine development is a purely speculative venture for private property and profit and not as a "common carrier" for the "public good." We all know that coal production is down in the USA, and the coal companies are looking for new markets. We also know that Arch Coal has undeveloped coal deposits in the Gillette area, that they already have the very expensive infrastructure to mine that coal, that Gillette coal is superior in quality to Otter Creek coal, and that they will therefore mine that

coal, if at all, before developing Otter Creek. This renders the Tongue River Railroad totally unnecessary.

The argument for "U.S. Energy Independence" is now completely specious, as the U.S. is already exporting energy at an increasing rate, and Otter Creek coal, if mined, is destined for Asian markets, not U.S. markets.

All of the negative impacts of the TRR and an Otter Creek mine would be borne by the local citizens and taxpayers not by the developers. The STB knows that. And it would all be to the detriment of the long-term existing economy: farming, ranching, and recreation.

The hearing I attended, though adhering to the laws appeared to be a mere formality, and an expensive one at that. The maps on the display boards and those being ceremoniously passed out to everyone are identical ^{to} maps in the 1982 EIS. They even include a spur to the defunct Montco mine. This gives the impression that a fresh new EIS is not being made, as required by law, that new information is not being considered carefully, that the least possible effort and expense is going into the EIS on the part of ICF International, and that the whole EIS process is flawed and not responding to the December 2011 ruling of the Ninth Circuit Court.

Why are we even addressing the possibility of a TRR at this time? Why are we having these hearings for a railroad permit when there is no mine and may never be one? The situation is analogous to a small community building a big, expensive high school football stadium "just in case" they ever happen to have a high school, a very remote possibility since the need for a high school is declining in that community.

A railroad permit for a TRR makes NO SENSE, economically or otherwise. And it most certainly would not be in the "public interest." The No Action Alternative is the only really honest way to go.

Sincerely yours,

Nancy W. Carrel

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