

December 11, 2012

Ken Blodgett
Surface of Transportation Board
Office of Environmental Analysis
ATTN: Environmental Filing, Docket No. FD 30186
395 E Street, SW
Washington, DC 20423-0001

Re: Tongue River Railroad Co., Inc.
Rail Construction and Operation in Custer, Powder River and Rosebud Cos., MT
Environment Impact Statement

Dear Mr. Blodgett:

My name is Deborah Hanson. I am a long time citizen of Miles City and small business owner. As a member of Northern Plains Resource Council since the early '70's and a former board member, I have been concerned with the proposed Tongue River Railroad since it was first proposed in 1980. I delivered this statement at the hearing held in Miles City, MT on November 15, 2012.

I want to commend you on undertaking a new EIS as the information that the railroad was basing their permit on was inadequate and decades old.

Public convenience and necessity: The Tongue River Railroad (TRR) was a speculative railroad to haul coal from the never approved MontCo mine. Now, the TRR proposes to haul coal from a **ONE** purpose mine, not yet permitted, (the Otter Creek Coal tracts) for the coal company giant ARCH Coal to the coast for shipping to China and Asia.. The proposed Tongue River Railroad is **NOT** for the "public convenience and necessity" which is what is required for a body to get the power of eminent domain and condemnation authority.

Water: The impact on the quality of the water in the building of said railroad needs to be determined, not only for the great addition to sediment but also in conjunction with the affect on the water quality and quantity from a very large open pit mine in the aquifer combined with the coal bed methane industry that is already affecting the Tongue River. All together these developments have a cumulative effect. In this country where water is often scarce and used by our sustainable agriculture industry, water is the life blood.

Flood Hazard: The proposed routes of the Tongue River railroad cut the floodplain of the Tongue River Valley in half from Otter Creek to Miles City. The railroad would likely channel and accelerate the flow of floodwaters north along the rail bed toward Miles City. As a property owner located in the flood plain (as most of us are), we need to insist the a flood assessment is included in the EIS. The Army Corps of Engineers has been studying our flood plain problems. This has never been addressed in prior EIS submitted by Tongue River Railroad.

Fish Hatchery: The proposed route does not protect our federal fish hatchery where we are raising **pallid sturgeon, an endangered species**. The route is still too close to the hatchery. A lot of time and public money has gone into this hatchery. A private, for profit, company should not trump the public when it comes to designing a route.

Our Tongue River Valley Neighbors: Farmers and Ranchers in the valley will have their property devalued, make their operations more difficult and expensive, shift liability for train crossings to the landowner. Noxious weeds, fires, roads needed to access the rail for fire and repair, noise and its effect on livestock ...all need to be addressed in detail. **Who will pay?**

Internalized profits, externalized costs: Taxes and infrastructure costs go up for residents of communities along the rail route and the coastal ports, also greatly increased train traffic, traffic delays, noise, diesel pollution. And, of course, the greenhouse gas costs for mining, rail hauling, shipping, hauling to Chinese plants, and finally the burning of the coal (which returns to Montana via the air!) Is it the coal and railroad companies that reap the profits and the citizens who pay the costs?

We Tongue River Valley folks request that you include all of these factors in your Environmental Analysis. We strongly believe that the Tongue River Valley is no place for a railroad.

We support the **NO ACTION ALTERNATIVE**.

Sincerely,



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