

FL Ranch
29 Red Bluff Loop
Birney, MT 59012

Sept. 14, 2015

Ken Blodgett

STB

395 E Street S.W.

Washington, DC 20423

Docket # 30186 ATTN: OEA

Dear Mr. Blodgett:

I recommend the "No Action Alternative." The concept of a Tongue River Railroad and an Otter Creek mine is purely speculative. And there is no reason, from anyone's point of view, for construction of a railroad without a coal mine. The two projects are inseparable.

Where any of the alternative routes of a Tongue River railroad (TRR) cross private land, and would require condemnation of such land, eminent domain action could not apply because a TRR and Otter Creek mine would only serve private interests with no benefit to any "public necessity" or good.

Chapter 2: states that Otter Creek contains "low-sulfur" coal. No mention of the fact that it is also "high sodium." High sodium coal cannot be burned efficiently without adversely affecting the generating plants.

"Potentially Induced" mine: What kind of bureaucratic meaningless terminology is that?

Chapter 5: It is good that the matter of greenhouse gases is addressed. Climate change should never be a political issue. It is a global scientific issue. One does not need to read this EIS to conclude that an Otter Creek mine, the largest projected mine in Montana, and its accompanying TRR would contribute to global warming.

Chapter 9: Tongue River water has already been degraded by the Decker area mines. Our irrigating water has already been adversely affected. Multiple water crossings and construction would degrade it further. As ranchers, we are not allowed to put a small pump or a few rocks in the river without a permit. How to justify "multiple water crossings"? The river could not possibly withstand them.

Chapter 12 and 20: "Short-term uses vs. Long-term productivity of the Environment" says it all. The Tongue River valley has been highly productive agricultural land for almost 150 years, and it continues to be so. A coal mine and a railroad to serve it would be short-term at best.

Conclusion: The No Action Alternative is the only one that makes sense, both economically and environmentally.

Sincerely yours,
Nancy W. Carrel
NANCY W. CARREL