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DEPARTMENT OF NATURAL
RESOURCES AND CONSERVATION



JUDY MARTZ
GOVERNOR

DIRECTOR'S OFFICE (406) 444-2074
TELEFAX NUMBER (406) 444-2684

STATE OF MONTANA

WATER RESOURCES DIVISION (406) 444-6601
TELEFAX NUMBERS (406) 444-0533 / (406) 444-5915
<http://www.dnrc.state.mt.us/wrd/home.htm>

1424 9TH AVENUE
PO BOX 201601
HELENA, MONTANA 59620-1601

December 2, 2004

Attention: Kenneth Blodgett
Surface Transportation Board
Case Control Unit
Washington, DC 20423



Re: STB Docket No. FD 30186 (Sub-No.3)

Dear Mr. Blodgett:

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement (SEIS) concerning the construction and operation of the proposed Tongue River Railroad - Western Alignment. Our comments are as follows:

1. It was noted that the proposed railroad route crosses over Leaf Rock Creek on the northwest side of the Tongue River Reservoir (figure 4-13, page 4-158; Volume I, of the SEIS). It is not very clear from the information, maps and diagrams in the SEIS if the fill area, which appears to be very large for this particular crossing, could affect Tongue River Reservoir storage (i.e. loss of storage due to the fill area being within the post rehabilitation high water level). This issue needs to be addressed before the actual design and engineering work for this crossing is finalized. Any loss of reservoir storage would require mitigation.
2. There is a potential for adverse water quality impacts to the Tongue River from the placement of new culverts, crossing and bridges, and the related soil disturbance from the construction. This may cause an increase in erosion, sedimentation and turbidity, and may increase the possibility of violating the new water quality standards set forth in the Tongue TMDL (the TMDL is a water quality enhancement planning process administered by the Environmental Protection Agency, and is required for all waters in Montana classified as impaired).
3. The cumulative effects of the railroad construction and operation, along with potential Coal Bed Methane developments in the area may further potentially degrade water quality in the Tongue River.
4. The construction will increase the threat of spreading noxious weeds. Noxious weed control must be addressed in both the construction and operation phases of the railroad.

STATE WATER PROJECTS
BUREAU
(406) 444-6646

WATER MANAGEMENT
BUREAU
(406) 444-6637

WATER OPERATIONS
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(406) 444-0860

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BUREAU
(406) 444-6610

5. The increased road traffic and heavy equipment on the county road along the reservoir will greatly increase the maintenance requirements and will likely damage the road. Any increase in maintenance and damage to the road will need to be mitigated and addressed as part of the final design.
6. Wildfire danger will increase along the railroad route. Trains are notorious for starting brush and grass fires. This could negatively impact local and state firefighting resources in the region.
7. Air quality may be impacted from increased dust (specifically coal dust).
8. There will be an increase in noise from the operation of the trains. This may negatively affect recreational users at the Tongue River Reservoir, which is a very popular recreation site.

Please contact me at (406) 444-2932 if you have any questions or wish to discuss our concerns in more detail. Thank you for the opportunity to comment on the Draft SEIS.

Sincerely,



Kevin Smith, P.E.
State Water Projects Bureau Chief
Water Resources Division

Cc: File
Jim Domino, DNRC
Jack Stults, DNRC
Fred Robinson, DNRC
Art Hayes, TRWUA
Keith Kerbel, DNRC