

FD 30186-3 EI-67

Surface Transportation Board
Case Control Unit
Washington, D.C. 20423-0001

KB



Attention: Kenneth Blodgett, Section of Environmental Analysis

May 7, 2003

Dear Mr. Blodgett:

I am submitting comments in response to your request on the adequacy of the final scope of the supplement dated February 3, 1999, for the construction, maintenance, and operation of the Tongue River Railroad (STB Finance Docket No. 30186, Sub-No. 3). I have followed the progress of this highly speculative venture since the 1980s and am amazed that this railroad continues to be promoted despite all the substantive reasons, environmental and economic, that are repeatedly presented against its construction. Even the pr-development 2003 Montana Legislature resoundingly voted down an appeal by the promoter for state-supported bonds for the project!

Because of all the new information that must be considered in this environmental document that is far beyond the scope of simply reviewing the "Western alignment," I want to see a full and new environmental impact statement (EIS) prepared for the ENTIRE 89-mile proposed railroad. As a biologist and NEPA compliance specialist for the federal government, I will be quite interested to see how this EIS analyses and evaluates the implications of various connected actions, including but not limited to, coal bed methane development in Wyoming and Montana, several new power plants in Wyoming, expanded coal mining in Wyoming, and the potential for new power plants in Montana. With the immense number of connected projects and the lapse of time since the previous environmental documents were prepared for this railroad, I do not believe that you can adequately analyze and evaluate the consequences of the Tongue River Railroad by simply tiering a supplemental EIS off of the two previous documents.

I am concerned that a thorough inventory of the plant, fish, or wildlife resources for any of the alignments that have arisen through the years has never been done. I do understand that "data on hand," which had been collected by area biologists (federal and state) for other reasons, was used to prepare the previous documents. However, because no field studies were ever specifically done on any of the alignment corridors, no one is really sure what is there and how the railroad would impact those resources. I believe that analysis specific to all of these alignments is necessary to be compliant with today's standards.

I am also concerned about the amount of earth that needs to be moved under the current proposal—17 million cubic yards, as I understand it. This presents enormous environmental problems. In some areas, 200-300 feet will be removed from the tops of hills and placed as fill in drainages. While the company may intend to put culverts into

these fills to carry runoff, the drainages are, in reality, damned. The erosion and sedimentation that results from this scale of construction needs thorough analysis. I am skeptical that it even possible to devise enough significant mitigation that would allow the Army Corps of Engineers to issue a 404 permit under the Clean Water Act.

The amount of water that is needed during construction will be considerable. How will this effect the streams and/or water table of the region? How will this use as well as the operation of the railroad affect the sauger, sickle-fin chub, and paddlefish, all species of concern for this watershed?

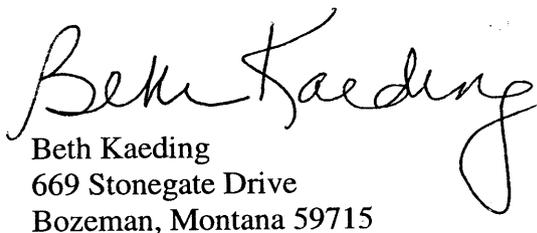
The amount of bare earth exposed by this proposal will be considerable. This type of habitat is ripe for invasion by noxious weeds. How will this be controlled? What mechanism will the permitting agencies use to monitor the necessary continued vigilance of the railroad to this significant on-going problem? If the railroad does not stay on top of the problem, how will any penalties be levied and enforced? These noxious weeds, if established, will spread and adversely affect the lands and livelihood of area ranchers.

I am concerned about the huge impact to southeast Montana from coal bed methane development in Wyoming and Montana. The additional impact to this area posed by the proposed railroad must be thoroughly analyzed. This massive development was not considered in previous documents concerning this proposed railroad. The cumulative impacts will be substantial.

I have many other concerns about the Tongue River Railroad proposal (*e.g.*, fires from railroad operation; disruption of livestock operations as a result of bisecting ranch property, death of stock on the rail lines, noise, etc.; the lack of financing to secure the success of this speculative venture and the impacts to land, water, and local residents from a partially completed project or a project that is abandoned after completion; the effects this project will have on the character of the region and the lives of the area residents), but (as required in the scoping process) the issues that I have raised are those that I do not find addressed in the information I have received.

Please keep my name on the list of interested parties for this project and provide me with information and documents, as they become available.

Sincerely,


Beth Kaeding
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Bozeman, Montana 59715