

PM

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December 2, 2004

Surface Transportation Board  
Case Control Unit  
Washington, DC 20423  
Attn: Kenneth Blodgett  
STB Docket No. FD 30186 (Sub-No. 3)

RE: Tongue River Railroad Western Alignment (TRR III)

Dear Mr. Blodgett:

I encourage the Surface Transportation Board (STB) to reevaluate the findings issued in the Draft Supplemental Environmental Impact Statement for the Tongue River Railroad Western Alignment (TRR III).

The document is deficient in several respects. I believe that, once these deficiencies are addressed and remedied, the conclusion reached will be far different. Specifically:

- The data used for the analysis is incomplete and out-of-date. Current information regarding environmental and economic impacts, including the existing conditions, must be used for an accurate analysis. Among the areas which require additional focus are wildlife populations and habitat, water quality, air quality, wells and springs, the impact of the clogging of existing waterways by the fill dirt which would have to be removed for the project, as well as the interplay between these elements. Due to the impacts of our long-term drought, the Tongue River and its environs are even more fragile than in the past. In addition, the possibility of coal bed methane and/or oil and gas development and the related impacts need to be factored into the analysis.
- The cumulative impact analysis required by the National Environmental Policy Act (NEPA) is missing. There can be a significant differential in the degree of impact when the full scope of a project is analyzed, rather than focussing on segments in a piecemeal fashion. In addition, the cumulative impact must be evaluated from a single time perspective (the current one) in order for a valid analysis to be performed.
- The draft EIS specifically says the route has been "refined"; however, this was done without seeking input from those landowners most directly impacted by the route. With all due respect, conditions in eastern Montana are far different from those in Washington, DC and, as the Federal Highway Administration can attest to from their

experience in designing the Interstate Highway system on paper, reality is a far different matter than designs drafted on paper.

- The need for the proposed railroad has not been demonstrated. Other railroads already provide service to existing coal operations. In fact, the proposed railroad would be anticipated to remove any competitive advantage currently experienced by the mines in Colstrip. Montana land and the well-being of her citizens should not be sacrificed to provide an advantage for Wyoming businesses. The socioeconomic impacts have not been properly evaluated in the EIS.

Again, I strongly urge you to reevaluate your findings considering all of the facts as they currently exist. I fully realize that many individuals and groups have stepped forward in support of the project; however, these people have not been fully informed of the impacts. In fact, these same people came forward to support a road project in our neighborhood. The draft Environmental Assessment for this project indicated a FONSI; however, when all NEPA requirements were met and current and accurate facts were used in the evaluation, the finding was changed to a recommendation of "no build". The responsibility for following federal requirements and doing an adequate job of providing accurate findings and assessment of impacts to the public is yours. As I am sure you are well aware, this is not a responsibility to be taken lightly.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen L. Morris". The signature is fluid and cursive, with a large initial "K" and "M".

Karen L. Morris