

Received: 9/23/2015 12:00:00 AM

Commenter: Claudia Narcisco

Organization:

State: Montana

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

Claudia Narcisco

222 North Higgins Avenue, Missoula, Montana 59802

My name is Claudia Narcisco. I'm a volunteer with the Montana chapter of the Sierra Club. We strongly oppose all but the no action alternative for the Tongue River Railroad.

We are also going to be involved with the National Sierra Club and we're going to have much more in depth comments when we submit them. We are in it for the long haul and we are not giving up. That's the main thrust of what the Sierra Club has to say here tonight, even though I'm just a volunteer.

We are also disappointed that the Surface Transportation Board didn't find Missoula worthy of having our own public hearing here, that all of the hearings are in coal-friendly communities in the eastern part of state. I'm just going to put it on the record that we believe that the public involvement process has been skewed to favor coal development, as a result of where they have chose to have their hearings.

We have serious concerns about the adequacy of the analysis in a number of areas. The dEIS considers "the pacific northwest coal export capacity as reasonably foreseeable". As far as we're concerned, this is nothing more than looking backwards through rose-colored glasses.

Markets to the west in the United States do not want coal. We have our Senator Daines writing to Governor Inslee of Washington threatening him, we have a bill that was passed this legislative session funding a slush fund so that we can litigate our neighbors. So we are ready to go to war on tax payer dollars so that we can get this coal out of the ground and into the air.

The dEIS also determines that the Tongue River Railroad's proposal was economically and technically feasible. Apparently, several people have already brought this up, but they are unaware of the known fact that the market value of Arch Coal has declined from \$5.7 billion in 2010 to \$108 million, so somebody did the math on that one in December of this past year. I took that out of economics for dummies right out of the Missoulian from Tom Powers, this past week, May 29, 2015.

It ignores cumulative effects in a broad way. We were talking about the wildlife. A few years ago, we had a really bad stormy winter and the antelope were annihilated along the tracks because the snow was so deep that they kind of gravitated, and railroads really had negative effect on antelopes. I'm sure it's probably not only the mule deer, but other populations as well. They discussed nothing about this.

They also ignored the political climate in Montana. This passed legislative session, this is pertinent to the word equality, the legislature passed Senate Bill 325, and the governor actually signed it. This woman who spoke earlier, she obviously recognizes that matter.

Basically, it was introduced by labor, it was Senator Keane from Butte, Montana. I was at several of the hearings, and without exception the people who got up as a proponent for this bill were the petroleum and coal industry. All of the people present who got up in opposition were the farmers. The Northern Plain Resource Council was well represented

with their members.

Basically it allows Otter Creek to put all of its salty water into the Tongue River tributaries and thereby degrading, not only the culture and the farming land and everything, but the whole agricultural economy of that area. So this is really serious. Will there be no competition anymore if you get rid of the agricultural community? It's a big dent. I cannot believe that the governor actually signed it.

They've just been referring to water as blue gold. That's just one example and obviously, it's too late to be considered in this document, but that Senate Bill 325, we should all keep our eyes on it.

Of course, it ignores the impacts and the inadequacy of the analysis of communities along the route. Several people talked about the pollution and the noise. It does recognize that 34% of the impacts will be felt by low-income communities. That's exactly what we're seeing here in Missoula because we have a road too, which is on the north side, and that is in a low income community. It may be within spitting distance of the new College of Technology. It's right across the street. Noise pollution. How many tens of millions of dollars is the Montana tax payer putting into that facility? And then we're going to have coal trains going by like conveyor belt right across the street.

These are some of our concerns that they have not considered. They did a really poor job of assessing the impacts on cultural and historic resources. The Sierra Club contracted a prominent archaeologist to review the section 106 compliance for the document, and that is going to be something that we're going to be hanging our hat on. That is very inadequate. I'm not going into details here, but the quality and the quantity of what the contractor from the dEIS did in the area is seriously wanton and this is a requirement of law.

We're hoping that is a big deterrent for them and they're going to have to go back to the drawing board. Nobody talked about weeds, spread of weeds by the railroad. That's another fact of cumulative effects that was not considered. As a former president of Local 60 multinational federation of federal employees here in Missoula Montana, we have 600 bargaining union employees. I have in the past written two letters to the editor, but I'm really disappointed that labor in Montana is so pro-coal.

Jeff just said something about the 3% union in coal. Arch Coal, a few years ago, joined with Peabody and they spawned something called Patriot Coal. Anyway, they know that they're not representing labor in joining with Arch, and Patriot Call tried to get rid of all the benefits for the labor. Even Peabody negotiated a settlement. Arch just dug its heels in the ground.