

Ken Blodgett

Surface Transportation Board

395 E Street SW

Washington, DC 20423-0001

Attention: Environmental Filing, Docket No. FD 30186

November 30, 2012

Dear Mr. Blodgett:

On behalf of Cynthia Radue, my wife, and myself I am submitting the following scoping comments to the Surface Transportation Board (STB) in response to its October 22, 2012 Notice of Intent (NOT) to prepare an environmental impact statement (EIS) on the application to build the Tongue River Railroad (TRR) in Montana. This application was submitted by the Tongue River Railroad Company (TRRC) on October 16, 2012. These comments are submitted in an effort to aid the STB in identifying issues that we believe should be addressed in the EIS. Please ensure that our comments are entered into the public record.

We own a ranch and live in the Tongue River Valley. Our operation depends entirely on clean air and water, native soils and vegetation, and lands that remain intact. The Tongue River Valley is unique; it is one of the few major valleys in the lower 48 states that does not have a railroad and/or a super highway. Largely because of this it remains in relatively pristine condition. Two years ago we had a mountain lion in the yard. For years the Rocky Mountain Bird Observatory has done studies on our ranch, in part because of the large number of species found. This study is now done with the cooperation of the University of Montana, Department of Ornithology. Because of the pristine nature of this Valley there is a large number of bald eagles nesting along the River. This is also one of the last strongholds of the Greater Sage Grouse, *Centrocercus urophasianus*. In the US this species is a candidate for listing under the Endangered Species Act. In 2010 the US Department of the Interior assigned the sage grouse a

status known as “warranted but precluded”, putting it on a waiting list behind more threatened species for Federal protection.

These grouse and to a lesser extent eagles cannot live and reproduce where there is much of mankind’s activity. We refer you to:

*Breeding Ecology, Survival Rates, And Causes of Mortality of Hunted And Nonhunted Greater Sage-Grouse in Central Montana*, Jenny Lyn Sika, Montana State University, Bozeman, Montana, November 2006

Certainly a railroad and subsequent industrialization would greatly affect these species and likely many others. How do the developers of this proposed railroad propose to compensate for this loss of habitat?

Our ranch adjoins the State of Montana owned “Tongue River Ranch”. Pheasants Forever, Inc., a non-profit, tax exempt organization helped the State buy this Ranch because of its conservation value and that of the entire Valley. The local Chapter of Pheasants Forever, the Tongue River Chapter has engaged in various conservation and habitat improvement projects on this Ranch. If this proposed railroad is built, much of the conservation values of the Ranch and that of over 80 miles of the Valley would be lost. This railroad would make much of the Ranch inaccessible to hunters, birdwatchers, fishermen, and others. The issue of liability for accidents involving persons, vehicles, and horses attempting to cross the railroad right-of-way arises as would the dangers arising from hunters shooting on the Ranch.

We who own land along the proposed route and alternative routes need to understand exactly where this railroad might be located so that we can adequately understand and address any impacts and concerns should the route be located across our land. We must be afforded accurate, current information on the proposed route and alternative routes if we are going to have the opportunity to comment effectively on this project.

The Northern Cheyenne Tribe has been able to negotiate Class 1 air quality for their Reservation which we also benefit from out here in the Tongue River Valley. Railroad engines emit diesel fumes and particulate matter. Coal dust will blow off the coal being hauled. What will be the net affect of the ambient air quality of this area from the operation of the TRR?

The noise, the operation of the TRR will have in a currently rural, non-industrialized, agricultural valley is a significant impact. We often do not think of noise as a health issue beyond the obvious link of loud noise exposure to hearing impairment and deafness, but the medical literature does link noise to significant human health issues. Noise is linked to cardiovascular disease, including increased blood pressure, arrhythmia, stroke, and ischemic heart disease. Noises linked to cognitive impairment in children, noises linked to sleep disturbance, fatigue,

and increased rates of accidents and injuries. Noise can exacerbate mental health disorders such as depression, stress and anxiety, and psychosis.

The TRR will industrialize an agricultural area that currently enjoys clean air, clean water, native grass lands, valuable fish and wildlife habitat, and abundant recreational opportunities. The area will be permanently and negatively affected by the TRR and its connected cumulative activities, such as increased traffic, noise, and dust. The end result is a quiet, peaceful, rural agricultural Valley will be turned into an industrial zone. The EIS needs to address these values and issues even if the area is not officially designated as wild and scenic.

Isolated ranch families, our Northern Cheyenne neighbors, and the Amish Community will all be disproportionately impacted by the construction and operation of the TRR. The EIS should discuss the impacts on these communities that the TRR will create.

We believe the No-Action alternative must be selected.

Sincerely,

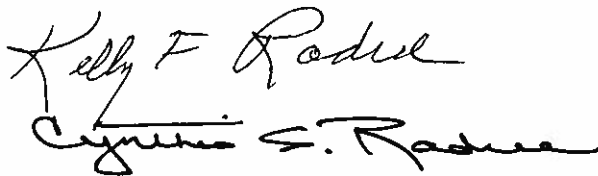
Kelly F. and Cynthia S. Radue

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Handwritten signatures of Kelly F. Radue and Cynthia S. Radue. The signatures are written in black ink and are positioned one above the other.