



LAKE PEND OREILLE WATERKEEPER®

Our Lake for Life

Mr. Ken Blodgett
Surface Transportation Board
395 E Street, S.W., Washington, DC, 20423
ATTN: Office of Environmental Analysis, Docket No. 30186

Dear Mr. Blodgett,

Thank you for considering Lake Pend Oreille Waterkeeper's comments on the Draft Environmental Impact Statement (DEIS) for the Tongue River Railroad. Lake Pend Oreille Waterkeeper (LPOW) is a non-profit organization located in Sandpoint, Idaho that works to protect the water quality of Lake Pend Oreille and its associated waterways so that they remain swimmable, fishable and drinkable for future generations. Lake Pend Oreille is located in Bonner County, (North) Idaho, a region that is becoming increasingly impacted by the transport of fossil fuels by rail including coal and crude oil.

Sandpoint, Idaho represents the "choke point" or "funnel" for all rail traffic traveling westward from coal generating states including Montana. All coal trains must pass through Sandpoint and over Lake Pend Oreille on their way westward to existing coal export facilities in British Columbia. This will also be the case for proposed export facilities in the state of Washington. Therefore, Sandpoint takes the brunt of all of the environmental, human health and safety and economic threats that coal by rail transport represents.

LPOW opposes construction of the Tongue River Railroad, and we urge the STB to take the "no action alternative."

The railroad proposes to haul coal from the speculative Otter Creek mine at a time when coal markets are crumbling both domestically and around the world. The Otter Creek mine is clearly a connected impact of the railroad's construction.

Otter Creek is the largest proposed coal mine in the United States, and represents 1.3 billion tons of coal that, if mined, would contribute to climate change for the next 55 years. Wildfires raged out of control in North Idaho forests for a significant portion of the summer due to ultra-dry conditions that were directly related to the lack of snowpack last winter. Climate change is already impacting our region with major economic, social and environmental consequences. Otter Creek coal needs to remain in the ground.

The DEIS wrongly assumes that there is a domestic coal market for high-sodium Otter Creek coal and grossly overestimates the economic viability of Otter Creek coal in Asian markets. The DEIS also wrongly assumes zero train traffic impacts from construction of a rail line that could transport 18-26 additional coal trains per day. It's negligent to assume that coal train traffic will not have down-line impacts to the west either due to the uncertainty of coal export terminal proposals, proposed displacement of current coal train traffic to the west or both. It appears that ignoring down-line impacts to the west in the DEIS was more out of convenience, due



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to the expansive nature of the route and the rail-side communities affected, than the realities of new rail traffic generated from the transport of Otter Creek coal.

It's clear that rail communities in North Idaho and those located between the proposed railroad and Pacific Northwest export terminals would suffer the consequences of dramatically increased coal train traffic, including slashed property values, increased traffic congestion, safety hazards, and air and water pollution from both diesel exhaust, fugitive coal dust and the threat of derailment into local waterways.

The TRR and coal export only benefit private coal companies and Asian energy users while it hurts those of us who live along the rail line. On behalf of Lake Pend Oreille Waterkeeper, we strongly urge the Surface Transportation Board to say no to the Tongue River Railroad and take the "no action alternative".

Sincerely,

Shannon Williamson, Ph.D.
Executive Director
Lake Pend Oreille Waterkeeper