

Submission Number: *FD-30186-000321*

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Commenter: Dow Constantine

Organization: King County and Safe Energy Leadership Alliance

State: Washington

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

Thank you for your consideration of my attached new comment letter and resubmitted letter from March 27th that I reference.

Safe Energy Leadership Alliance

March 27, 2015

Deb Miller
Acting Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Environmental Review for Proposed Tongue River Railroad

Dear Chairman Miller and Members of the Surface Transportation Board (STB):

We are members of the **Safe Energy Leadership Alliance (SELA)** – a coalition of more than 150 local, state, and tribal leaders from across the Pacific Northwest, Montana, California, and Canada – seeking a full assessment and disclosure of the economic, cultural, environmental, health, and safety risks posed by increasing coal and oil transport by rail and barge.

We are concerned about the health, safety, traffic, economic, and environmental impacts associated with a substantial increase in coal transport by rail that will occur if proposed coal export terminals in the Pacific Northwest and British Columbia are approved. The proposed Tongue River Railroad would connect the Otter Creek coal mine to the existing rail network and would significantly increase coal train traffic through our region.

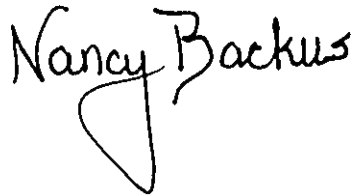
The STB's scoping document for the Environmental Impact Statement (EIS) includes a commitment to analyze the down line impacts of increased rail traffic resulting from this proposal. We ask that you fulfill this commitment and consult with communities to assess the health, safety, traffic, economic, and environmental impacts to the hundreds of communities that would be impacted by increased rail traffic. Slow-moving, mile-and-a-half long coal trains already delay traffic at-grade rail crossings, impact freight mobility, and can delay emergency responders. Coal dust from open rail cars pollutes air, water, and soil, and exposes our communities to toxic heavy metals and health risks. Some of our most vulnerable populations live along rail corridors.

We are also concerned about the substantial financial burden that could be placed on local governments to mitigate the down line impacts on health, safety, traffic, and economy. For reference, a recent study by the Puget Sound Regional Council (PSRC) on the potential impacts of increased train traffic from the proposed Gateway Pacific Terminal identified 34 crossings in the Puget Sound region that would benefit from grade separation to prevent traffic delays and maintain emergency access. The estimated cost for these improvements is \$50 million to \$200 million for each crossing. PSRC estimates only account for increased coal train traffic projected for the proposed Gateway Pacific Terminal. We have not seen a commitment from railroads and shippers to pay their fair share of expensive infrastructure upgrades needed to mitigate down line impacts, and request that the STB make this a requirement.

Additional coal train traffic will impact our communities large and small, urban and rural, across a vast geographic area. We formally request that the STB include SELA as a party of record for development of an EIS for the Tongue River Railroad.

Thank you for your consideration. We look forward to hearing from you.

Sincerely,



Nancy Backus
Mayor, City of Auburn, WA

Lisa Batey
Council President, City of Milwaukee OR



Paul Blackburn
Mayor, City of Hood River, OR

Tim Burgess
Council President, City of Seattle, WA



Jack Burkman
Council Member, City of Vancouver, WA



Arlene Burns
Mayor, City of Mosier, OR



Joan Cathey
Council Member, City of Tumwater, WA



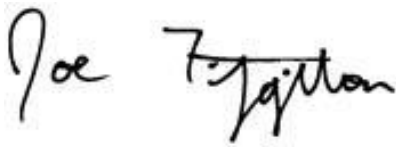
Dow Constantine
King County Executive (WA)
Chair of SELA



Christine Cook
Council Member, City of Mukilteo, WA



Chris Eggen
Council Member, City of Shoreline, WA



Joe Fitzgibbon
Washington State Representative (34th District)



Adrienne Fraley-Monillas
Council Member, City of Edmonds, WA



Mark Gamba
Councilor, City of Milwaukee, OR



Jean Godden
Council Member, City of Seattle, WA



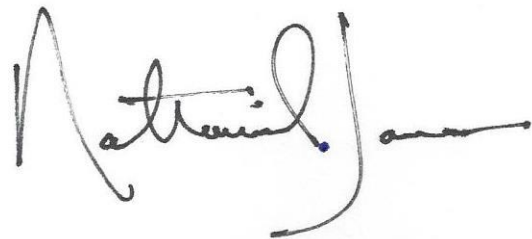
Jennifer Gregerson
Mayor, City of Mukilteo, WA



Katherine Haque-Hausrath
Commissioner, City of Helena, MT



Stacia Jenkins
Council Member, City of Normandy Park, WA



Nathaniel Jones
Mayor Pro Tem, City of Olympia, WA

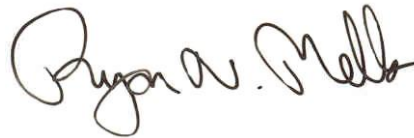


Joyce Lindsay
Council Member, City of Washougal, WA

Randy Lord
Council President, City of Mukilteo, WA



Sue Malek
Montana State Senate (46th District)



Ryan Mello
Council Member, City of Tacoma, WA



Mike O'Brien
Council Member, City of Seattle, WA



Chuck Puchmayr
Councilor, City of New Westminster, BC



Wayne Roth
Council Member, City of Bainbridge Island, WA



Chris Roberts
Council Member, City of Shoreline, WA



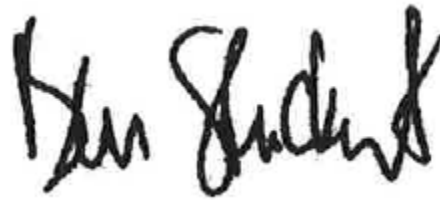
Kshama Sawant
Council Member, City of Seattle, WA



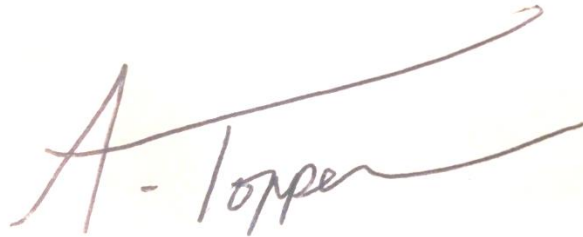
Jon Snyder
Council Member, City of Spokane, WA



Brenda Stonecipher
Council Member, City of Everett, WA



Ben Stuckart
Council President, City of Spokane, WA



Alishia Topper
Council Member, City of Vancouver, WA



Nancy Tosta
Deputy Mayor, City of Burien, WA



Ryan Walters
Council Member, City of Anacortes, WA



Shannon Williamson
Council Member, City of Sandpoint, ID

cc: Ann D. Begeman, STB Vice Chair
Victoria Rutson, Director, STB Office of Environmental Analysis



King County

Dow Constantine

King County Executive

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September 23, 2015

Ken Blodgett
Surface Transportation Board
395 E St. SW
Washington, DC 20423

RE: Office of Environmental Analysis, Docket No. 30186

Dear Mr. Blodgett:

Thank you for the opportunity to submit comments on the recently published Surface Transportation Board (STB) Office of Environmental Analysis (OEA) draft Environmental Impact Statement (EIS) for construction and operation of the proposed Tongue River Railroad in Southeastern Montana.

I am chair of the Safe Energy Leadership Alliance (SELA), a coalition of more than 160 local, tribal, and state leaders from across Montana, Washington, Oregon, Idaho, California, and British Columbia working to raise awareness of the health, safety, environmental, and economic risks of oil transport and coal export. SELA represents a broad range of urban and rural areas with different interests, but a shared mission – to protect the health and safety of our communities.

Projects like the Tongue River Railroad (TRR) have health, safety, traffic, economic, and environmental impacts far beyond the borders of its host facilities; this is why SELA works to ensure that permitting decisions include a comprehensive assessment of impacts and risks. Unfortunately, the draft EIS for the proposed construction inadequately considers the impacts to western states and our communities from the construction of the TRR. I respectfully request that the OEA address the concerns SELA members raised in a letter dated March 27, 2015 (see attached) regarding possible environmental, economic, and social impacts to our communities.

In our previous letter, SELA members requested the EIS include analysis of the down-line impacts of increased rail traffic resulting from this proposal. We asked for a review of the health, safety, traffic, economic, and environmental impacts to the hundreds of downstream communities that would be impacted by increased coal train traffic. Slow-moving, mile-and-

a-half-long coal trains already delay traffic at at-grade rail crossings, impact freight mobility, and can delay emergency responders. Coal dust from open rail cars pollutes air, water, and soil, and exposes our communities to toxic heavy metals and health risks.

In the March 27, 2015 letter, SELA members also expressed concern about the substantial financial burden that could be placed on local governments to mitigate the down-line impacts on health, safety, traffic, and economy. In my area, the central Puget Sound Region, there are 34 identified crossings that would benefit from grade separation to prevent traffic delays and maintain emergency access. The estimated cost for these improvements is \$50 million to \$200 million for each crossing. The DEIS for this proposed construction inadequately considers the downstream impacts to our cities and towns in the western and northwestern states.

The Tongue River Railroad Company identified Asia as a target market by export through the existing terminal located south of Vancouver, British Columbia, and possibly through additional proposed coal export facilities in the Pacific Northwest. I request that the final EIS for the Tongue River Railroad include a comprehensive analysis of the impacts of rail traffic to communities along the connections between the Otter Creek coal mine and the proposed export terminals on the Pacific Coast.

Thank you for your consideration of my comments.

Sincerely,

A handwritten signature in black ink that reads "Dow Constantine". The signature is fluid and cursive, with the first name "Dow" being more prominent and the last name "Constantine" following in a similar style.

Dow Constantine
King County Executive
Chair, Safe Energy Leadership Alliance