

Submission Number: *FD-30186-000144*

Received: 8/21/2015 5:08:56 PM

Commenter: John Muhlfeld

Organization: City of Whitefish

State: Montana

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

See attached letter



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

August 18, 2015

Subject: Comment on Tongue River Railroad DEIS

Dear Mr. Blodgett,

As Mayor of the City of Whitefish, Montana, I transmitted on September 8, 2014 to the Surface Transportation Board a resolution passed unanimously by the Whitefish City Council regarding the Tongue River Railroad. The Council asked STB to hold a public hearing in Whitefish on the proposed railroad line, and we requested full consideration of the impact of additional coal railroad cars going through Whitefish if the railroad is approved and constructed.

Unfortunately, the STB chose not to hold any hearings in western Montana and the Draft EIS issued this spring fails to consider down-rail impacts of increased coal train traffic. The City of Whitefish urges STB to supplement the Draft EIS to properly consider likely project impacts to Whitefish. Further, if the STB permits TRR, the Board should exercise its authority to require the Tongue River Railroad to help mitigate costs and impacts to the community of Whitefish identified below.

The City of Whitefish respectfully urges STB to take a closer look at the following issues and impacts to the City:

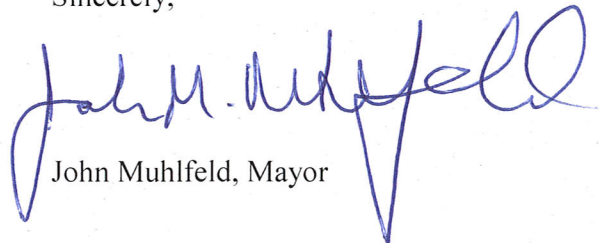
- 1) The DEIS fails to acknowledge the likelihood of increased coal train traffic destined for West Coast ports if TRR is approved. In 2012, the Tongue River Railroad partnership, including BNSF Railway and Arch Coal, changed the proposed route so that it would go west to Colstrip rather than east to Miles City. This followed Arch Coal's 2011 investment in a coal export terminal in Longview, Washington and its stated intention (<http://investor.archcoal.com/phoenix.zhtml?c=107109&p=irol-newsArticle&ID=1515428>) to export coal from recently acquired Montana reserves. BNSF also has invested heavily to expand rail capacity to accommodate more freight traffic between St. Paul and the Pacific Northwest (<http://www.businesswire.com/news/home/20150609006428/en/BNSF-Introduces-Intermodal-Service-Schedules-Northern-Region%23.VXohblVVikp#.VbD10PnNKAU>). This clear shift to export markets by TRR partners makes sense given coal's dramatic decline in market share for domestic electricity production.
- 2) Few coal trains currently pass through Whitefish, but federal approval of the Tongue River Railroad and state approval of the Otter Creek Coal Mine quite possibly would result in more coal traffic through our town. Most westbound coal in Montana is shipped by Montana Rail Link to the south of us. However, MRL has limited capacity to expand traffic while BNSF has invested heavily to accommodate heavier freight traffic along its

Northern Tier through Whitefish. Therefore, it's reasonable to conclude that TRR approval will lead to increased coal train traffic through Whitefish. The impacts of increased coal traffic should be considered in the context of the cumulative effect of increased oil train traffic in recent years, which has affected city operations and created impacts on public health and safety, provisions for environmental protection, and reliability of passenger rail service.

- 3) A Supplemental EIS should better examine these potential impacts to the Whitefish community:
- Delays and adverse rescheduling of Amtrak's Empire Builder route. Whitefish is a major destination for Amtrak passengers. Residents and visitors utilize Amtrak for pleasure and business, and Amtrak service is an important part of our economy. Service has deteriorated in recent years due to increased freight and oil traffic: additional coal trains will likely exacerbate that problem.
 - Increased delays at three at-grade crossings (Birch Point, Second Street and State Park Road). Increased delays can inconvenience residents and park visitors, especially at two of the crossings where residents have no other ingress and egress to city neighborhoods. Increased traffic can block access for emergency service vehicles to those neighborhoods.
 - The Whitefish community lacks the funding to mitigate community impacts of increased train traffic through construction of quiet zones, underpasses or overpasses.
 - The addition of loaded coal trains to the existing mix of freight traffic requires mitigation planning in the event that a derailment dumps loaded railcars of coal or crude oil in or around Whitefish. A spill of coal or oil into Whitefish Lake would have far reaching impacts to the community. Up to thirty percent of Whitefish's municipal water supply comes from Whitefish Lake and the lake itself is a primary driver behind our tourist economy. These impacts would adversely affect the health and quality of life of Whitefish residents. Additionally, increased coal train traffic may pose other public health and safety issues from diesel emissions and fugitive coal dust. It should be noted that the Whitefish Middle School is less than 100 yards from the BNSF tracks.

Thank you for the opportunity to comment on the Draft EIS for the Tongue River Railroad. Please let us know how you intend to respond to our comments.

Sincerely,



John Muhlfeld, Mayor