



EI-19025

SPOKANE CITY COUNCIL
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Spokane, WA 99201-3335
(509) 625-6255

Ben Stuckart
Council President

November 2, 2012

Ken Blodgett
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Attention: Environmental Filing, Docket No. FD 30186

Dear Sir:

As the Surface Transportation Board begins to prepare an Environmental Impact Statement on a proposed new permit for the Tongue River Railroad company in Montana, the City of Spokane calls on the Surface Transportation Board to include in its analysis of impacts the significant increase in coal trains traveling in and out of Spokane as a result of this new rail line.

The proposed railroad which was originally conceived to carry Montana coal to Midwestern utilities is now directed toward markets on the Pacific Rim. The proposed Otter Creek mine in Southeastern Montana would initially produce 22 million tons per year, with plans to reach full production of 40-45 million tons per year. The configuration of the rail system in the region is such that all of that coal, and any additional mines in that region that might be opened up as a result of the rail spur would have to travel through Spokane on its way to ports.

The Otter Creek Mine alone would add more than 15 trains per day to the load of traffic going through Spokane¹. It would produce a larger tonnage than all of the agricultural commodities shipped out of our region².

The City Council of Spokane unanimously adopted a resolution identifying its direct interests in coal export terminals west of here in Washington and Oregon. I have included a copy of the resolution with this letter.

The Surface Transportation Board is in a unique position to review the Tongue River Railroad and consider the wider impacts on the rail system of the region of coal exports from the Powder River Basin via ports in the Pacific Northwest. In addition to the coal trains that might originate on the Tongue River Railroad, the city of Sheridan, Wyoming, has produced a study that anticipates an additional 30 (plus) coal trains a day coming

¹ Whiteside, Terry, and Gerald Fauth, Heavy Traffic Ahead, Figure 5, p. 10.

² Ibid. Figure 21, p. 42.

out of coal fields in the upper Tongue River drainage (Spring Creek, Youngs Creek, Decker) and the northern Powder River Basin in Gillette.¹

The volume of coal traffic from the proposed Tongue River Railroad along with other mines in the Powder River Basin represents an exponential increase in train traffic through the Pacific Northwest², stressing a system that in many areas is already near or at capacity according to the Washington Dept. of Transportation, and noted as well in "Heavy Traffic Ahead," a report prepared for the Western Organization of Resource Councils by Terry Whiteside and Gerald Fauth.

Substantial increases in coal trains through Spokane from the Tongue River Railroad would present serious issues and problems. These include inadequate infrastructure, public safety and traffic delays, impacts on businesses near the rail lines, the need for costly new infrastructure, air quality problems due to diesel particulate emissions and coal dust, and other concerns including property values and noise.

The City of Spokane raises the following concerns to be looked at in the environmental review of this proposed rail line:

Rail line capacity and impacts

Traffic congestion and Public Safety

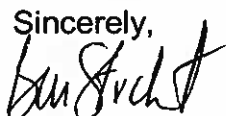
Infrastructure needs

Noise pollution

Air Pollution

Business impacts

Property values

Sincerely,

Ben Stuckart

¹ The Sheridan Press, "Railroad reroute: Study: Number of trains traveling through Sheridan each day could reach 66 by 2022," Oct. 16, 2012.

² Ibid, Figure 4, p. 7.

**Agenda Sheet for City Council Meeting of:**

06/18/2012

Date Rec'd

6/6/2012

Clerk's File #

RES 2012-0052

Renews #**Submitting Dept**

CITY COUNCIL

Cross Ref #**Contact Name/Phone**

BEN STUCKART 625.6258

Project #**Contact E-Mail**

BSTUCKART@SPOKANECITY.ORG

Bid #**Agenda Item Type**

Resolutions

Requisition #**Agenda Item Name**

0320 COAL RESOLUTION

Agenda Wording

A resolution expressing interest regarding potential impacts of increased rail traffic passing through the City of Spokane resulting from proposed terminal projects,

Summary (Background)

There have been recent discussions of the development of proposed terminal projects on the west coast of the United States, including the west coast of Washington State, for the overseas shipment of coal. The coal would be transported to the terminals by train traveling through communities, including Spokane. There are potential impacts of increased rail traffic passing through the City of Spokane resulting from proposed terminal projects.

Fiscal Impact**Budget Account**

Select \$

#

Select \$

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Select \$

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Select \$

#

Approvals**Council Notifications****Dept Head**

WESTFALL, JENNIFER

Study Session**Division Director****Other****Finance**

LESESNE, MICHELE

Distribution List**Legal**

PICCOLO, MIKE

For the Mayor

FEIST, MARLENE

Additional Approvals**Purchasing**

Agenda Item Name: 0320 COAL RESOLUTION

Agenda Wording (630 character max)

and requesting that the principal agencies reviewing the Environmental Impact Statements (EIS) for said projects, study and identify the impacts to the City of Spokane, and that at least one of the EIS Scoping hearings be held in Spokane.

Summary (Background) (870 character max)

This resolution requests that the principal agencies reviewing the Environmental Impact Statements (EIS) for those projects, study and identify the impacts to the City of Spokane, and that at least one of the EIS Scoping hearings be held in Spokane.

Fiscal Impact

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Budget Account

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Distribution List

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Resolution No. 2012-0052

A resolution expressing interest regarding potential impacts of increased rail traffic passing through the City of Spokane resulting from proposed terminal projects, and requesting that the principal agencies reviewing the Environmental Impact Statements (EIS) for said projects, study and identify the impacts to the City of Spokane, and that at least one of the EIS Scoping hearings be held in Spokane.

WHEREAS Spokane, as the major rail crossroads of the Inland Northwest, would bear a significant increase in the number of coal trains passing through the City of Spokane; and

WHEREAS, the Council is reviewing the potential impacts on our community's health, air quality, safety and businesses from noise pollution, coal dust and other particulates from additional coal trains; and

WHEREAS, diesel exhaust and coal dust contain substances proven to increase the risk of cancer, lung disease, and worsened asthma from additional coal trains; and

WHEREAS, thousands of Spokane City residents live or work within ¼ mile of the rail corridor which is the source of concentrated mobile-source air toxins produced by diesel emissions; and

WHEREAS, a significant increase in coal train traffic may compromise the response time of emergency responders, and may delay general commerce, commuters, and other vehicular traffic.

NOW, THEREFORE, BE IT RESOLVED by the City Council of Spokane as follows:

- 1) We ask that the potential impacts to Spokane's public health, safety, economy, traffic, and air quality be studied by the agencies conducting the environmental review and request that Spokane be included in any EIS hearing schedule pertaining to any project in the Northwest that may cause significant increases in associated rail traffic traveling via Spokane; and
- 2) We urge the U.S. Army Corps of Engineers, Department of Ecology, and Whatcom City Council to hold at least one of the environmental impact statement scoping hearings in Spokane and to conduct thorough studies which identify and measure the major impacts to Spokane that would result from a significant increase in coal train traffic.

ADOPTED by the City Council _____, 2012.

City Clerk

Approved as to form:

Assistant City Attorney