



Clean River ♦ Healthy Community

Jerry White, Jr.
35 W Main St Suite 300
Spokane WA 99201

June 17th, 2015

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

Dear Mr. Blodgett,

I am making the following comments on behalf of the Spokane Riverkeeper. The Riverkeeper program works for a fishable and swimmable Spokane River and endeavours to protect it from those forces that threaten its health and the well-being. The Spokane River is the heart and soul of our city and a healthy river is essential for a healthy community.

The Spokane Riverkeeper believes that the construction of the Tongue River Rail road will have several major impacts on our river and our community. Spokane Riverkeeper opposes construction of the Tongue River Railroad, and urges the STB to take the "no action alternative."

1. Coal dust has a destructive impact

The proposed railroad could eventually carry 18-26 coal trains per day and the EIS wrongly assumes zero impacts on adjacent communities. Much of this coal would ultimately travel on through Spokane to terminals on the West Coast. As such, Spokane could see as many as forty coal trains per day over our river and through our city. BNSF studies have shown that each coal car loses as much as 500lbs of raw coal from uncovered cars each trip. These cars travel adjacent to our river and two tributaries into our river. We have found coal in the creeks and along the banks of these rivers from the train traffic carrying loads of coal. This dust is laden with heavy metals and is toxic to humans and aquatic ecosystems. The construction of the railroad will discharge more coal and coal dust into our waterways and into our urban neighbourhoods. Additionally coal dust has been shown to have a negative impact on rail infrastructure in that the dust is corrosive and weakens rail lines. Spokane is the site of accelerated oil-by-rail traffic and weakened rails increase the odds of a catastrophic rail accident and consequent oil spill and or fire in our community or in our river.

www.spokaneriverkeeper.org | [@SpokaneRiverKpr](https://twitter.com/SpokaneRiverKpr) | [/SpokaneRiverkeeper](https://www.facebook.com/SpokaneRiverkeeper)
509.835.5211 | 35 W. Main Ave Suite 300 Spokane, WA 99201



2. The global combustion of coal is depriving our river and community of water

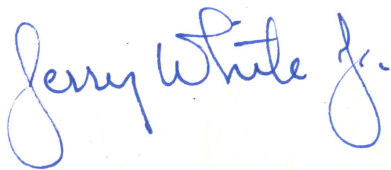
Otter Creek is the largest proposed coal mine in the United States, and represents 1.3 billion tons of coal that, if mined, would contribute to climate change for the next 55 years. The combustion of coal across the earth has been shown to have extreme effects on the Pacific Northwest climate by emitting greenhouse gas. The impacts of this combustion on the Spokane River cannot be denied nor understated. The development of the Otter Creek Mine and the Tongue River Railroad will only exacerbate effect. This year the snow pack in the mountains that feed our river was at an all-time low, an impact felt by extremely warm waters off in the Pacific Ocean. At this moment, our river is running at 1,100 cubic feet per second (CFS). Normally it runs at 10,000 CFS making our current flow a 10th of normal at the front end of the dry season. We have never seen these low flows in recorded history. To expand the capacity of coal fired energy is actively destroy our river. Our citizens and our businesses are being deprived of a community asset that has been the foundation our culture, economics and history since its founding.

2. The global combustion of coal is poisoning our water and our fish with methyl mercury

The combustion of coal in Asia has been shown contribute toxic, methyl mercury into Pacific Northwest waterways. Asia emits over 1500 tons of mercury a year and much of that is returned to our waters due to atmospheric transport. According to sources at the National Oceanic and Atmospheric Administration, mercury and other airborne contaminants collect over China during the winter and spring until Siberian winds arrive bearing dust from expanding Chinese and Mongolian deserts. Every five or six days, the winds flush out eastern China, sending dust and industrial pollutants such as ozone precursors high over the Pacific and on to our rivers where it bio-accumulates in virtually all of our fish species. We in Washington State and Spokane, currently have mercury related fish advisories for all of our species of fish and no one can eat fish without worrying about the effects of methyl mercury.

The construction of this Railroad will have lasting negative impacts on our world, our local community and our Spokane River. The costs of this rail road project in terms of environmental impacts far outweigh any short term benefits. We urge the Surface Transportation Board to take the "no action alternative".

Thanks for the opportunity to comment.

A handwritten signature in blue ink that reads "Jerry White Jr." with a stylized flourish at the end.

Jerry White, Jr.
Spokane Riverkeeper