



316 North Park Ave., Room 230, Helena, MT 59623
Phone: 406-447-8351 / Fax: 406-447-8398
Email: publichealth@lccountymt.gov
Website: www.LewisAndClarkHealth.org

Ken Blodgett
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-2001
ATTN: Office of Environmental Analysis
Docket No. 30186

September 16, 2015

Re: The Tongue River Railroad Draft Environmental Impact Statement Deficiencies and Potential Air Quality Impacts on Helena and Lewis and Clark County.

Dear Mr. Blodgett:

Lewis and Clark Public Health has had an opportunity to review the Draft Environmental Impact Statement (DEIS) for the Tongue River Railroad (TRR). We are concerned that the DEIS fails to address potential air quality impacts to Lewis and Clark County and the cities of Helena and East Helena. We request that the Surface Transportation Board (STB) Office of Environmental Analysis address our concerns regarding possible air quality impacts arising from the construction of the TRR and its attendant increased rail traffic through our communities.

Our first concern is that the DEIS does not analyze the impacts of increased coal train traffic being shipped to the Pacific coast for export to Asia. If the DEIS finds increased westward traffic "reasonably foreseeable" (DEIS p. S-9) and if, as stated in Appendix C, P.14, "Arch Coal might choose to export rather than sell domestically when there are opportunities to maximize profits over the suite of assets that include mines, railroads and export terminals," then an environmental impact statement should address those possibilities. Arch Coal has stated that it has the capacity to service coal demand in Asia (Arch Coal news release: Arch Coal Acquires Entity Interest in West Coast Coal Terminal. January 12, 2011).

Our second concern is that Helena and the surrounding air shed borders on exceeding the EPA ambient air quality standards for particulate pollution. Additional train traffic, which is quite likely as explained above, will contribute incrementally to our particulate pollution through increased train diesel emissions and increased automobile idling at any of Helena's

Our mission is to improve and protect the health of all Lewis and Clark County residents.

five rail crossings. In response to increasing PM 2.5, Lewis and Clark County signed up to become participants in EPA's PM Advance program (<http://www.epa.gov/ozoneadvance/participantsPM.html>). Increased train traffic will likely exacerbate the existing problem.

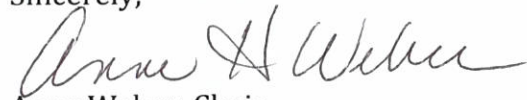
Thirdly, the DEIS dismisses air quality health concerns because there are no projected National Ambient Air Quality Standard (NAAQS) exceedances associated with the TRR project. However, particulate matter negatively impacts human health at concentrations lower than the NAAQS, and diesel particulate from trains has been associated with increased lung cancer incidence in residents adjacent to a rail yard (Spokane Regional Clean Air Agency, 2011).

Potential impacts to Lewis and Clark County and its cities include:

- Exposure to particulate matter from train cargo, diesel exhaust and increased idling of automobile traffic at crossings.
- Delays of emergency vehicles at five at-grade crossings in Helena.

Lewis and Clark Public Health finds the TRR DEIS deficient in the omission of western communities in its analysis. There appears to be an inadequate examination of health impacts from the construction and use of the TRR. These deficiencies and TRR's impacts on Lewis and Clark County and the cities of Helena and East Helena need to be addressed in the final EIS.

Sincerely,



Anne Weber, Chair

Lewis and Clark City-County Board of Health