



BOARD OF COUNTY COMMISSIONERS
MAILING ADDRESS: 200 WEST BROADWAY
PHYSICAL ADDRESS: 199 WEST PINE
MISSOULA, MT 59802-4292

BCC 2015-112
August 20, 2015

PHONE: (406) 258-4877
~~FAX: (406) 721-4043~~
FAX: (406) 258-3943

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

**RE: THE TONGUE RIVER RAILROAD DRAFT ENVIRONMENTAL IMPACT STATEMENT
DEFICIENCIES AND POTENTIAL AIR QUALITY IMPACTS ON MISSOULA CITY AND
COUNTY**

Dear Mr. Blodgett:

The Missoula County Commissioners believe that the Draft Environmental Impact Statement (DEIS) for the Tongue River Railroad (TRR) erroneously omits the project's potential air quality impacts to the City of Missoula and Missoula County, as well as other small communities throughout the County. We respectfully request that the Surface Transportation Board (STB) Office of Environmental Analysis (OEA) consider our concerns regarding the possible air quality impacts resulting from the construction of the TRR on citizens in Missoula County.

The Missoula City-County Pollution Control Board and the Air Quality Advisory Council both sent detailed letters regarding the numerous deficiencies in the TRR DEIS, so we will not go into as much detail.

When compiling the DEIS, the OEA did not analyze the project's impacts on western communities at all. This decision was based on the assumption that coal from mines serviced by the TRR will not be transported west for export. However, the DEIS contains multiple contradictions to this assumption, including mentions that exports (to Asia) are "reasonably foreseeable" (DEIS p. S-9). In Appendix C, p-14, the DEIS states that "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." The recent EPA recommendations for reduction of emissions from coal fired plants will also result in coal exports rather than domestic use.

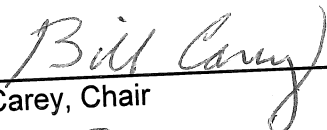
Additionally, once the TRR is constructed, there is nothing preventing trains from taking the western route, therefore, it needs to be analyzed to meet the requirements of an EIS. Therefore, the western route must be analyzed for potential impacts.

The TRR DEIS is deficient in other areas besides the omission of western communities in its analysis. These omissions include a lack of transparency, the dismissal of climate change impacts, and an inadequate examination of health impacts from the construction and use of the TRR. These deficiencies and TRR's impacts on the City and County of Missoula need to be addressed in the final EIS.

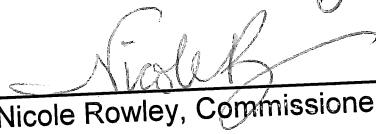
We request that public hearings be held in Missoula, MT on the TRR DEIS after the western route analysis has been completed.

Unless the TRR DEIS addresses the potential impact on communities to the west, including those in Missoula County, we support the "No Action" option.

Sincerely,
BOARD OF COUNTY COMMISSIONERS
MISSOULA COUNTY, MONTANA



Bill Carey, Chair



Nicole Rowley, Commissioner



Jean Curtiss, Commissioner

BCC/ppr

cc: Jeffrey Smith
Nick Engelfried
Cate Campbell