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Organization: 350-Missoula

State: Montana

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

Dear STB, Attached you will find formal comments from 350-Missoula on the Tongue River Railroad project, as well as two photos documenting the proximity of the railroad tracks in Missoula to residential and commercial areas. Thank you for your consideration of these comments.

350-Missoula

September 21, 2015

Comments on the Tongue River Railroad Draft EIS

Dear US Surface Transportation Board,

I am writing to you on behalf of 350-Missoula, regarding our organizations serious concerns with the draft Environmental Impact Statement for the Tongue River Railroad project. Please note that the STB will also soon be receiving a box of comments post marked September 23rd, which 350-Missoula gathered from individuals in the Missoula area. Those comments represent the views of the individual authors, whereas this letter represents 350-Missoula's official position on the TRR project.

350-Missoula is concerned that the DEIS is overly dismissive of health impacts from air pollutants associated with increased coal train traffic in rail line communities in Western Montana. Our organization also objects to the failure of the DEIS to adequately analyze circumstances that make increased coal train traffic in these communities particularly worrying from a public health perspective. We believe the potential health impacts from exposure to coal dust and train-related diesel emissions are serious, and that the DEIS does not do a sufficient job analyzing how Western Montana communities would be affected. We also feel the DEIS does an inadequate job looking at the true likely climate change impacts of building the TRR. We feel the DEIS falls especially short in the several ways, outlined below.

Failure to adequately analyze Western Montana impacts

We are highly skeptical of the conclusion reached in the DEIS that "the majority of project-related coal traffic would travel to destinations in the Upper Midwest over BNSF rail lines" (17-5). Declining coal demand in the US, increasing demand in developing countries overseas, and the inability of most US coal plants to burn high-sodium coal of the type that would be mined from the Otter Creek Tracts make this conclusion seem counterintuitive and contrary to common sense at best.

We expect other stakeholders will do a more thorough job of challenging the assumptions made in the DEIS that led to its strange conclusions about the destination for coal transported on the Tongue River Railroad. Our main purpose here is to direct the STB's attention to specific public health hazards presented by increased coal train traffic in Montana communities, which we feel have been neglected in the DEIS. Even if the prediction that most trains using the Tongue River Railroad would be headed to Midwest power plants is correct, the DEIS does acknowledge that some trains may be destined for West Coast export terminals (either existing terminals in Canada or new ones proposed for construction in Washington State and Oregon). We are disappointed that the DEIS does an insufficient job analyzing impacts coal train traffic on communities along this western route.

Below, we outline some of the specific ways we believe Western Montana communities will be affected by increased railroad traffic caused by building the Tongue River Railroad.

Unrealistic assumptions about coal dust

Coal trains moving between the Tongue River Railroad and the West Coast would pass through several of Montana's largest cities, including Billings, Bozeman, Helena, and Missoula, as well as many other, smaller

towns. In many of these communities the railroad passes directly through highly populated residential and commercial districts, often with very little right-of-way separating the rail line from high-population urban neighborhoods. For example, in Missoula (Montana's second largest city) the Montana Rail Link line cuts straight through downtown and is located right next to several high-density populated areas directly north and south of the tracks in Missoula's Northside, Westside, and Heart of Missoula neighborhoods. The proximity of these neighborhoods to the tracks means they can be expected to be exposed to relatively high concentrations of coal dust, diesel fumes from locomotives, and other air pollutants associated with coal trains.

The DEIS notes that "The majority of coal dust particles [that are lost from moving coal trains]...would be deposited within 5 meters (16 feet) of the rail line" (4-18). The DEIS seems to assume that dust deposited within this radius would not end up in places frequented by members of the public, and therefore does not pose a significant health hazard. However, this assumption fails to take into account just how close to residential and commercial areas the railroad tracks come in some Montana communities. In Missoula, there are residential property boundaries, small businesses, a heavily used bike path, and at least one public park area within or very close to being within sixteen feet of the tracks used by coal trains and other freight. In some other Montana towns the tracks come similarly close to the private residences and businesses. Given the realities of life in Montana rail towns, we believe the DEIS's dismissal of potentially significant impacts from coal dust pollution is unrealistic.

Failure to account for unique coal dust deposition patterns in certain areas

In addition, we believe the DEIS does not do an adequate job analyzing what happens to coal dust and diesel particulates emitted by coal trains after they are deposited on the ground in Western Montana towns. The methods for analyzing coal dust deposition described in the DEIS seem to assume that the main or only source of coal dust accumulation is dust lost from rail cars during normal operations (6-5 – 6-18). This assumption does not take into account the much larger amounts of dust, as well as coal chunks that may eventually be ground up into dust, that are deposited on the ground during derailments and routine events like coupling full or "empty" coal cars in rail yards ("empty" coal cars returning from the West Coast and passing from west to east through Western Montana still contain significant amounts of coal that can generate dust when empty cars are banged together). Missoula is home to an industrial rail yard where trains are re-fueled, coupled, and undergo other maintenance. Anecdotal observations suggest that large amounts of dust are lost from trains in the rail yard, both when dust is dislodged from full or "empty" cars banging together during coupling, and during derailments that inevitably occur from time to time during the coupling process. Coal dust and chunks of coal may then remain on the ground in the rail yard for weeks, months, or years before being dislodged and being blown into areas near the tracks.

One might argue that the locations where train coupling and other events that lead to larger-than-normal depositions of coal dust are relatively few, and that in many cases they are likely to be located in industrial sections of town far from residential neighborhoods, minimizing human exposure to dust. However, while this assumption may hold true in most large cities with rail yards, it is inaccurate in Western Montana. Missoula's rail yard is directly adjacent to densely populated neighborhoods that in some cases are located literally mere yards away from the rail yard. Local residents have reported rail yard cleaning operations dislodging large clouds of black dust that blow into nearby residential areas during routine cleaning events, exposing residents to much higher concentrations of particulate pollution than can be expected

to result from individual coal trains. We believe the final EIS on the Tongue River Railroad should take into account the effects on downrail communities in Western Montana from pollution events like this, which will be exacerbated by increased coal train traffic.

Failure to analyze true health impacts of diesel emissions

The DEIS states, “The emission contributions [from diesel smoke] would be spread out over the entire length of the rail segments and would be diluted and dispersed by wind and atmospheric turbulence. As a result, increases in concentrations measured at air quality monitoring sites, if any, are expected to be negligible” (17-19). While it may be true that currently existent air quality monitoring sites may not register a noticeable increase in air pollution, the above statement fails to account for the localized nature of diesel emissions and the very real health impacts they may have in neighborhoods located very close to the rail line or to industrial rail yards like the one in Missoula. Plumes of diesel smoke may drift into inhabited areas and expose residents to extremely high concentrations of pollution before the smoke has the opportunity to be dispersed by wind. This is especially likely to happen in places like the Missoula rail yard, where trains often idle for significant periods of time while their locomotive engines continue to run.

As described earlier, the Missoula rail yard is located very close to residential neighborhoods, which can be expected to be exposed to high levels of pollution while trains are idling. Anecdotal reports from area residents suggest that people living near the Missoula rail yard frequently experience symptoms like eye and throat irritation, dizziness, and nausea while trains are idling in the yard nearby. These observations suggest serious health impacts that should be analyzed thoroughly in the final Tongue River Railroad EIS, since building the Tongue River Railroad can be expected to lead to an increased number of idling trains in downline communities.

Furthermore, the final EIS should account for the fact that wind dispersion of diesel pollution is not equally effective in all areas. For example, the Missoula Valley suffers from an inversion layer at certain time of the year which inhibits dispersal of pollution and tends to trap pollutants in the inhabited valley. The EIS should consider how the effects of diesel pollution may vary from community to another, and especially whether health impacts may be significantly worse in places like Missoula that suffer from an inversion layer as well as increased levels of pollution caused by idling trains.

Faulty analysis of climate change impacts

One of the most serious shortcomings of the DEIS is its failure to consider the true climate change impacts of building a railroad that’s main or only purpose would be to haul coal out of the proposed 1.3 billion ton Otter Creek Coal Mine. The DEIS dismisses the likely cumulative climate impacts from the TRR as “negligible positive impact to a minor adverse impact” (5.2-2), a conclusion it justifies by making strange assumptions and ignoring the true impacts of dumping billions of tons of new coal on the international market.

The DEIS assumes coal transported on the Tongue River Railroad would in large part simply replace other coal being mined elsewhere. We believe this is a faulty chain of reasoning that ignores how national and international energy markets actually work. To see why, let us temporarily assume the DEIS is correct in its previously-discussed assumption that most coal hauled by the TRR would be used by Midwest power plants and that it would therefore replace coal from other mines that is currently feeding those plants.

Even if that is the case, the main or only reason for TRR coal to replace coal from other projects would be if it turned out to be less expensive for these Midwest utilities. Access to cheaper coal supplies would reduce the cost of burning coal for these companies, and this would factor into their decisions about whether or not to replace aging coal plants with cleaner-burning natural gas or with renewables. At a time when utilities across the country are deciding whether to comply with new EPA clean air rules by installing costly pollution controls on old coal plants or replacing them with cleaner energy sources, access to cheaper coal could make the crucial difference in a utility's decision to keep an aging coal-fired power plant open. Thus, building the TRR can be expected to lead to higher cumulative carbon emissions *even if all coal hauled by the railroad is burned in the US and replaces coal from other mines.*

Of course, as argued earlier, we disagree with the assumption that most coal transported by the TRR will be burned in Midwest power plants, and feel that common sense and market forces strongly suggest the main reason to build the TRR is to transport coal to the West Coast for export. Under this scenario, the potential for increased cumulative carbon emissions caused by building the TRR becomes even more clear, since flooding the international market with more US coal can be expected to depress global coal prices and encourage developing countries to burn more coal and build more coal fired power plants—potentially locking these countries into decades of additional coal dependence.

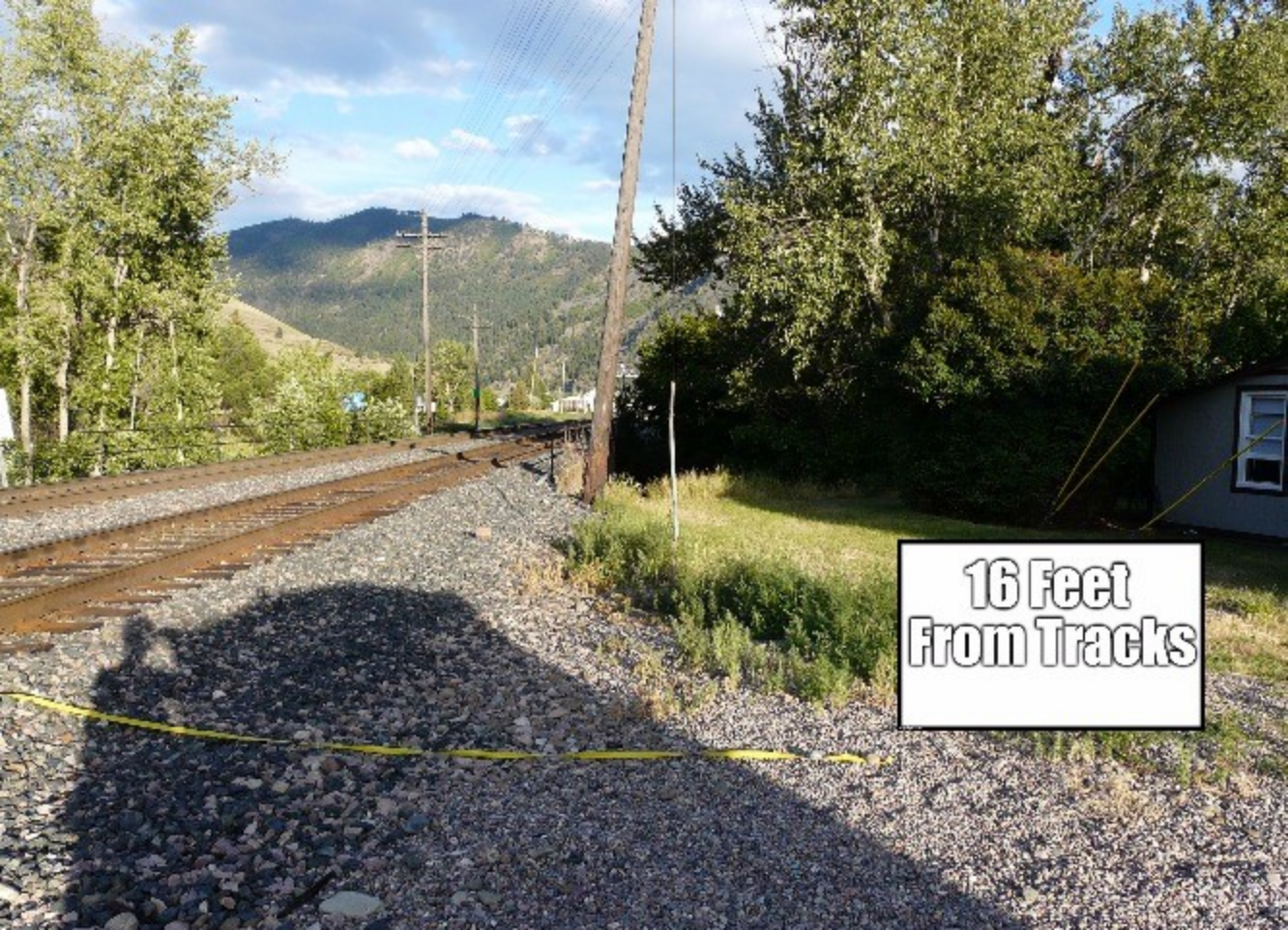
When considering the possibility of West Coast coal exports, the DEIS dismissively states that “the total tonnage of coal exported to Asia would not differ between the build alternatives and the No-Action Alternative,” because building the TRR would supposedly not impact the total amount of coal being exported out of West Coast terminals (5.2-14). This reasoning ignores the fact that approval of the TRR project could create an added incentive for coal companies to seek approval for new West Coast terminals so as to help guarantee a market for their product. Arch Coal, the backer of the proposed Otter Creek Mine, also owns a stake in a proposed coal export terminal in Longview, Washington, and it seems reasonable to assume approval of the TRR would make Arch all the more eager to build this terminal. Thus, approving the TRR has real potential to lead to increased coal exports and increased carbon emissions in ways that the DEIS seems not to have considered.

Closing

In summary, we believe the DEIS on the Tongue River Railroad falls short in several important ways that relate to public health impacts. The DEIS makes what appear to be unrealistic assumptions about where coal hauled by trains that use the Tongue River Railroad would be headed, and also fails to look adequately at several unique circumstances that apply to communities in Western Montana, especially in areas where residential neighborhoods are located very close to the rail line or an industrial rail yard. We hope that the final EIS will do a more thorough job analyzing all of the important health impact considerations outlined above.

Sincerely,

Nick Engelfried
Coal Committee Chair
350-Missoula

A photograph showing a gravel area adjacent to railroad tracks. A yellow caution tape is stretched across the gravel. In the background, there are trees, a hill, and a utility pole. A text box in the lower right corner indicates a distance of 16 feet from the tracks.

**16 Feet
From Tracks**

