



P.O. Box 376 Milltown, Montana 59851

www.friendsof2rivers.org

Phone (406) 370-6584

July 24, 2015

Ken Blodgett
Attention: Environmental filing, Docket No. 30186
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

Dear Mr. Blodgett:

Friends of Two Rivers, Inc. (FOTR) is an organization with members residing primarily in the mid-eastern portion of Missoula County, Montana. Our organizational mission is to support the quality of human and natural resource environments. Our area rail transportation is provided by Montana Rail Link on track leased from Burlington Northern and Santa Fe.

We appreciate this opportunity to comment on the Surface Transportation Board (STB), Office of Environmental Assessment (OEA) Draft Environmental Impact Statement (DEIS) for the proposed Tongue River Railroad (TRR). After reviewing the DEIS we conclude that the environmental harm caused by the TRR would be far greater than any benefit received. The DEIS fails to describe impacts that would accompany the operation of the TRR. If these impacts are adequately considered, they will lead to the conclusion that the "No Action" alternative (not permitting the building of the TRR) is the choice offering greatest benefit to all Americans.

We have two general areas of comment regarding inadequacies of the DEIS: I) A likely scenario for the development and transport of Tongue River area coal is not among those evaluated by the OEA; II) Impacts to the County of Missoula, Montana, because of increased coal train traffic on Montana Rail Link (MRL), are not included.

I. Scenario Missoula County – a most likely scenario not included in the TRR DEIS.

The public is prevented from fully evaluating the scenarios given in the DEIS for coal development and transport because the "Integrated Planning Model" used by OEA in postulating the scenarios is proprietary. We have identified a number of factors suggesting a likely increase of at least 18.6 coal trains/day (9.3 loaded, westbound; 9.3 empty, eastbound) through our area of residency within Missoula County. The possible increase is described in the DEIS this way: "If additional mines are developed in the project area and if new export terminals in the Pacific Northwest are constructed, then OEA predicted that rail traffic could be as high as 18.6 trains per day (for build alternatives going north) or 26.7 trains per day (for build alternatives going south) by the year 2030."

These factors support the likelihood of "Scenario Missoula County:"

1. On July 26, 2012, Otter Creek Coal, a wholly-owned subsidiary of Arch Coal, Inc., filed with the Montana Department of Environmental Quality (MDEQ) an application for a surface coal mining permit. (MDEQ; <http://deq.mt.gov/ottercreek/default.mcp.x>)
2. Arch Coal owns 34.68% of TRR (Surface Transportation Board 2013).

3. Arch Coal owns 38% of the Millennium Bulk Terminal in Longview, WA (Arch Coal 2011) with 20 million tons/yr of export capacity. This capacity exactly matches the 20 million ton annual production from the proposed Otter Creek Mine (Barkey, et al. 2012)
4. Arch Coal statement: “With our superior operating position in the Powder River Basin we have the capability to service growing coal demand in Asia, the world’s largest and fastest-growing coal market.” (Press Release, Arch Coal website, 1/20/2011: “Arch Coal Acquires Entity Interest in West Coast Terminal.”
5. Because of greater transportation efficiencies, TRR coal transported to the Millennium Bulk Terminal would have a \$2/ton lower cost than Wyoming Powder River coal and a \$9/ton lower cost than Montana Powder River Coal. (OEA TRR DEIS, 2015, Appendix C).
6. Because current coal train traffic through Missoula County fully satisfies an existing export capacity these trains may be expected to continue without change. TRR transported coal will create additional traffic.

CONCLUSION: Scenario Missoula County predicts a possible rail traffic increase through the County of at least 18.6 trains/day; 9.3 trains loaded, westbound and 9.3 trains empty, eastbound.

II. Impacts to Missoula County not addressed in the OEA TRR DEIS

1. Atmospheric mercury contamination will occur from burning TRR-transported coal in Asia. The TRR DEIS properly considers potential greenhouse gas emissions from burning the coal, but does not consider the impact of mercury emissions. According to a U. S. Geological Survey fact sheet published in 2013: “Best estimates to date suggest that human activities have about doubled or tripled the amount of mercury in the atmosphere, and the atmospheric burden is increasing by about 1.5 percent per year.” (USGS 2013). *This mercury ends up in Missoula County’s lakes and waterways and must be accounted for in the OEA Final Environmental Statement.*

Japan’s World War II balloon attack on the U.S. illustrates the speed with which air from Asia reaches our Country. More than 9000 balloons carrying either incendiaries or anti-personnel bombs were launched from Japan during 1944-1945. Wind currents took them to the U.S. west coast in 80-120 hours. Balloon remnants were found as far east as Michigan (Rahm 2015).
2. Coal dust air pollution from rail cars in transit, discussed in the DEIS. Chapter 4, describes the dust control agents of load shaping and “topper agents” applied to the surface of coal in the cars. Chapter 6 of the DEIS describes coal dust as containing particles that are visible as well as the invisible, smaller PM10 and PM2.5. Missoula County is currently a non-attainment area for PM2.5 and considers all manner of air pollutants to be of the greatest importance. Coal dust is of special concern because of its chemical constituency. It is a more significant health hazard than the ordinary dusts and pollens that affect our air quality. Are “topper agents” as effective on coal cars passing through the County as they are during the initial miles of transport? How fast do these agents degrade? Coal trains travel slowly through the City of Missoula where previous studies have shown little coal dust contamination. Coal dust can be expected to be more prevalent where trains move at higher speeds through the County’s rural communities such as Clinton, Turah, Milltown, Frenchtown, and Alberton. *A quantification of coal dust impacts in Missoula County, including visible particles as well as PM10 and PM2.5 must be provided in the OEA Final Environmental Statement.*
3. Potential traffic delays for residents in Missoula County have not been considered in the DEIS because no scenario described by OEA included increased TRR traffic through Missoula. We believe the Scenario Missoula County is likely, an increase of 18.6 trains per day is possible, and

that significant traffic delays can be expected. There are at least 10 crossings in the County where traffic will be blocked with no timely alternate route available: Clinton, Donovan Creek, Turah, Milltown, Missoula, Frenchtown (4 crossings), and Alberton. Clearly, emergency responders cannot be delayed more than a few seconds without additional risk to human life and/or property. The OEA DEIS gives data about traffic delays in terms of number of seconds of delay per vehicle per year. We consider this data to be without use in evaluating traffic delays. *The OEA FEIS must include a realistic estimate of expected traffic delays with particular attention to emergency vehicles. What is the probability that the increased TRR traffic will delay an emergency response by 10 seconds or more?*

4. Derailments along the waterways in Missoula County have not been considered in the DEIS. Although Missoula-based Montana Rail Link (MRL) is a valuable Missoula Community member providing an essential service we all recognize the inevitability of derailments even with the application of best maintenance practices. Many miles of MRL track in Missoula County pass along the Clark Fork River. What is the probability of a coal car derailment and a major coal spill into the River? What are the potential consequences of such a spill and how would it be cleaned up? *These questions must be answered in the OEA FEIS.*

III. Preferred alternative

Friends of Two Rivers supports the “No Action” alternative (the Tongue River Railroad is not built). The reasons for our preference are:

1. Significant potential impacts of the TRR project upon our members, residing in Missoula County, Montana are not addressed in the DEIS. We request that they be addressed in the final EIS and we fully expect these impacts will describe the unacceptability of the TRR project.
2. Building of the TRR will result in the combustion of coal that would contribute as much as 81 million metric tons of atmospheric CO₂ annually (OEA TRR DEIS, 2015, Q&A-6) as well as an undetermined addition of atmospheric mercury and other toxic contaminants. These atmospheric consequences are not acceptable at this critical time when our Country must join global society in seeking ways to reduce greenhouse gasses and mitigate climate change.

Friends of Two Rivers appreciates your attention to our comments.

Sincerely,


Alice Whiteman, President
Friends of Two Rivers

References:

Arch Coal. 2011. Press release <http://investor.archcoal.com/phoenix.zhtml?c=107109&p=irol-newsArticle&ID=1515428>

Barkey, P.M. and P.E. Polzin. 2012. The Impact of Otter Creek Coal Development on the Montana Economy. University of Montana Bureau of Business and Economic Research.

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