



Missoula City-County Air Pollution Control Board

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August 20, 2015

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

August 20, 2015

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 City-County Air Pollution Control Board believes 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. We respectfully request that the Surface Transportation Board (STB) Office of Environmental Analysis (OEA) consider our concerns regarding the possible air quality impacts to Missoula from the construction of the TRR.

The Air Pollution Control Board administers matters pertaining to the Missoula City-County Air Pollution Control Program in Missoula, Montana, in order to require the use of all available practicable methods to reduce, prevent and control air pollution in the City and County

It is the Air Pollution Control Board's observation that there are numerous deficiencies in the TRR DEIS:

Note: Please see the companion letter submitted by the Missoula City-County Air Quality Advisory Council (July 2, 2015) for detailed analyses of the following points.

1.0 Failure to assess a reasonable range of alternatives

When compiling the DEIS, the OEA did not analyze the project's impacts on western communities. 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.” In addition, upon obtaining its ownership interest in the Longview coal export terminal, Arch Coal made the following statement in a 2011 news release: “With our superior operating position in the Powder River Basin (meaning Otter Creek)...we have the capability to service growing coal demand in Asia, the world’s fastest-growing coal market.” (Arch Coal news release: Arch Coal Acquires Entity Interest in West Coast Coal Terminal. January 12, 2011)

Another reason to anticipate westward shipment is that the Tongue River coal is not currently being mined, and business relationships have not been established with Mid-western markets. Tongue River coal would have to displace current suppliers while traveling the longer route (via Colstrip) on the TRR. The higher expense makes westward shipment and export more likely.

In addition, once the TRR is constructed, there is nothing preventing trains from taking the western route.

2.0 Non-attainment areas trigger analysis

While we are actively seeking redesignation, Missoula is currently a non-attainment area for PM10. As described in Section 1.0, it is reasonable to anticipate TRR coal trains passing through Missoula. According to the DEIS (Q&A-4), the addition of three or more trains a day in a non-attainment area as a result of the TRR construction would require that the area be analyzed for health and environmental impacts. We have good reason to believe that the increase in coal train traffic will be substantially greater than three.

3.0 TRR is inconsistent with the public convenience and necessity

As described in the Missoula Air Quality Advisory Council’s letter to STB about the TRR DEIS (July 2, 2015), the proposed TRR fails the three-part test that has historically been used to evaluate whether a project is consistent with public convenience and necessity: whether an applicant is financially fit to undertake proposed construction and provide the proposed service, whether there is public demand or need for the proposed service, and whether the proposal is in the public interest and will not unduly harm existing services.

4.0 Problems with disclosure and transparency

The public does not have access to the model that was used to determine coal market conditions, and therefore cannot thoroughly analyze the rail traffic conclusions.

5.0 Inadequate examination of health impacts

The DEIS dismisses air quality health concerns because there are no projected National Ambient Air Quality Standard (NAAQS) exceedances associated with the 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 railyard (Spokane Regional Clean Air Agency, 2011).

6.0 Dismissal of climate change impacts

In its discussion of climate change impacts, the DEIS concludes that the greenhouse gas emissions from TRR coal would be miniscule. The DEIS inappropriately puts the projected emissions in a global context and ignores the additive effects of greenhouse gases being released into the atmosphere.

7.0 Missoula impacts

In addition to addressing the above deficiencies, the TRR Environmental Impact Statement should consider the following potential impacts to the City and County of Missoula:

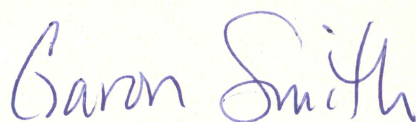
- Exposure to particulate matter from coal dust and diesel exhaust and the corresponding health risks and implications
- Delays of emergency vehicles (eleven of our thirteen crossings in the county are at-grade), when minutes and seconds count.
- Increased risk of train derailments due to the increased numbers of heavy trains on the tracks and the coal dropped on the tracks as “pernicious ballast foulant.”
- Increased wildfires, in number, duration and intensity (due to climate change), resulting in greater danger to structures, people living near the fires and fire fighters.

8.0 Conclusion

The Missoula City-County Air Pollution Control Board finds the TRR DEIS deficient in many areas, including the omission of western communities in its analysis, 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.

Without these changes to the document, we support the “No Action” option.

Sincerely,



Garon Smith
Chair, Missoula City-County Air Pollution Control Board