

Ken Blodgett

Surface Transportation Board

395 E Street S.W.

Washington, DC 20423-2001

ATTN: Office of Environmental Analysis

Docket No. 30186

September 14, 2015

Re: The Tongue River Railroad Draft Environmental Impact Statement

Dear Mr. Blodgett:

I am writing because I believe that the DEIS on the Tongue River Railroad (TRR) is inadequate because it does not consider the impacts on people and communities on the western route to the Pacific Coast for export markets in Asia. I request that the Office of Environmental Analysis consider my concerns.

The Missoula Air Pollution Control Board's recent letter to you which I agree with states as follows: In several sections the DEIS states that Tongue River coal will not be transported west for export, but will go to Midwestern coal-fired power plants. This is the reason given for not including communities along the western expanse of the rail line in the DEIS. However, there are also contradictory statements. Here are three: 1) Arch Coal press release, 2011, "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," 2) from the DES, use of the western route to export terminals is 'reasonably foreseeable', and 3) in Appendix C, p. 14, "Arch Coal might choose to export to Asia rather than sell domestically when there are opportunities to maximum profits." Exporting would mean carrying the coal through Missoula to the proposed export terminals on the Pacific Coast.

Another reason to anticipate westward shipment 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.

As mentioned earlier, the City-County of Missoula is currently a non-attainment area. According to the DEIS, the addition of three or more additional 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.

Their letter went on to say: The concerns we have for the air quality of the City and County of Missoula are many:

- Exposure to particulate matter from coal dust and diesel exhaust
- Impacts on the very young, the elderly and the infirm that are more at risk
- Exposure to mercury, arsenic, lead, cadmium and other toxins
- Increases in heart disease, lung diseases (including asthma), cancers and strokes
- Delays of emergency vehicles (eleven of our thirteen crossings in the county are at-grade), when minutes and seconds count.

We also care about risks to safety, such as derailments of any and all trains, the likelihood of which becomes greater with the numbers of heavy trains on the tracks and the coal dropped on the tracks as "pernicious ballast foulant." A derailment can cause serious health risks to those on the train and those near the scene of the derailment.

Regardless of where the coal is burned, it will affect the climate. The production of CO2 emissions and their contribution to global warming has been linked to:

- Increased wildfires, in number, duration and intensity, resulting in greater danger to structures, people living near the fires and fire fighters
- Warmer weather, which produces more smog, which in turn exacerbates respiratory and other illnesses
- Water pollution, mercury in fish, air pollution and polluted land
- More extreme weather events (heat, precipitation, drought, storms)
- Changes in seasons, sea level and snowpack that have increasing impacts on the amount of pollen and allergens, waterborne and vector-borne diseases, etc.

While the above is substantially from the quoted letter, my husband and I have other concerns. We question the financial viability of the coal companies involved. Coal companies have seen precipitous drops in their stocks. Competition for the Mid-Western markets will be a serious hurdle.

Finally, we believe an increase in use of heavy rail trains on the tracks could cause major maintenance problems for rails and tracks. This includes shaving or rails for shape and potential fire hazard while doing so.

The climate problem is global in nature, but the globe is made up of many areas including our own. Montana has vast coal resources which make it incumbent upon us to act responsibly regarding the shipment and combustion of coal. Because we cannot control the combustion conditions in foreign countries, we should be conscientious in limiting exports of this substance. It was reported recently on Bloomberg News and the Washington Post that over 4300 people in China a day (1.6 million people annually) are dying premature deaths due to pollution, primarily from coal-fired power plants. We cannot be complicit in this with a clear conscience. The profits for a few are not worth it.

Sincerely,

Harold J. Hoem
Janice R. Hoem

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