



LEWIS & CLARK CITY-COUNTY Health Department

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October 23, 2014

EI - 20581

Ken Blodgett
Office of Environmental Analysis
Surface Transportation Board
395 E. Street, SW
Washington, DC 20423

Dear Mr. Blodgett:

I am writing on behalf of the Lewis and Clark City-County Board of Health to request that you add us to a list of interested persons with respect to the construction of the Tongue River Railroad. We would like to be kept informed of progress on this project, to review data, and submit comments as appropriate.

Our interest in this project stems from the potential impacts to human health as a consequence of increased rail traffic through Southern Lewis and Clark County, and the towns of East Helena and Helena. Our specific concerns include:

- Air Quality
 - The Helena Valley is vulnerable to air inversions, trapping particulate air pollutants that include wood smoke, diesel and auto exhaust, and dust. We often exceed the US EPA ambient air standards for 24-hour particulate matter pollution (PM 2.5) during inversions. In June of this year, we became part of the US EPA PM Advance program in an effort to identify and reduce particulate pollution sources. Increased diesel exhaust and the potential for coal dust pollution may exacerbate the problem and we would like to more thoroughly understand what steps can be taken to address the potential for pollution from increased train traffic.
 - In addition to increased train traffic, longer and/or more frequent train traffic will block at-grade railroad crossings in Helena, resulting in increasing vehicular idling and increased automobile exhaust pollution. Local governments do not have funding to upgrade these crossings or to construction underpasses or overpasses, so it is likely that increased train traffic will directly affect air quality in our county.
- Noise
 - Noise pollution is a proven health hazard, particularly for persons living close to train tracks. Increased noise exposure can cause cardiovascular disease, cognitive impairment of children, sleep disruption and increased fatigue. Any increase in rail traffic should be analyzed for noise impacts as well as air quality and auto traffic disruption (more information at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1740389/> and http://www.who.int/quantifying_ehimpacts/publications/e94888/en/).

As stakeholders, we would like to thank you for agreeing to consider "down-line" impacts in the scope of the Tongue River Railroad EIS. Given how little information is available on air quality impacts from train traffic, we believe we must proactively address community health and safety effects from any proposed increase in train traffic.

The mission of the Lewis and Clark City-County Health Department is to improve and protect the health of all Lewis and Clark County residents.

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Please send correspondence and additional information to Melanie Reynolds, MPH, Health Officer, Lewis and Clark City-County Health Department, 316 N. Park Ave., Helena, MT 59601 or mreynolds@lccountymt.gov

Thank you for your consideration. We look forward to hearing from you.

Sincerely,



Anne Weber, Chair
Board of Health, Lewis and Clark County

Cc: Lewis and Clark City-County Board of Health
Kathy Moore, Administrator, Environmental Services
Melanie Reynolds, Health Officer, Lewis and Clark County

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