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Commenter: Greg Gordon

Organization: Spokane Audubon

State: Washington

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

September 19, 2015 RE: Tongue River Railroad Draft EIS Please consider the following comments with regard to the proposed Tongue River Railroad on behalf of Spokane Audubon and its 160 members. The mission of Spokane Audubon is “to nurture and protect birds and other wildlife and their habitats, and to encourage biological diversity for the benefit of people and nature in the Spokane region and the world in which we live.” Spokane Audubon opposes the construction of the Tongue River Railroad and urges the STB to select the “no action alternative” for the following reasons: Purpose and Need and Scope of Project The stated purpose of the Tongue River RR would be to transport coal from the yet undeveloped Otter Creek tracks to either the Midwest or to West Coast ports, which other than Vancouver, B.C. have yet to be permitted, much less constructed. Therefore, the TRRR, Otter Creek, and proposed export facilities need to be considered as a single project and the cumulative impacts of all three projects addressed in a single document. Spokane Audubon is not only concerned about the immediate impacts to the Tongue River, but of the associated impacts to Otter Creek, the Custer National Forest, the Northern Cheyenne Reservation, and Eastern Washington. Construction of the TRRR will assuredly lead to increases in coal transportation traffic in and around Spokane. As this project will have significant environmental and social impacts to Eastern Washington, we would ask that you address these impacts in the EIS. Wildlife Impacts All of the construction alternatives in the Draft EIS would significantly impact wildlife populations throughout the construction period as well as the life of the railroad as the line would cause habitation fragmentation and distribution. We are especially concerned about the impacts to riparian species and upland birds, especially sage grouse. The EIS needs to specifically address how this project (and the associated Otter Creek tracts) will impact sage grouse populations. Any alternative that impacts an Important Bird Area needs to be addressed. The TTRR EIS process needs to consider the full environmental and social impacts of coal leasing and development, including the cumulative impacts. Construction of the railroad and development of the Otter Creek tracks will severely impact the entire Tongue River Valley converting it into an industrial zone. The cascading impacts to wildlife species that result from the building the railroad and coal development are significant and need to be fully addressed in the EIS. Climate Change Construction of the TRRR will significantly increase GHG emissions, which in turn adversely impact bird species. In the past 40 years over half of North American wintering bird species have shifted their ranges northward. Audubon estimates that the Pacific Northwest will lose 32 bird species from climate change, while gaining new ones, but resulting in a 16% net loss. The problem with shifting habitat is that humans have already fragmented and eliminated much of the available habitat so that species become imperiled and threatened with extinction with such shift. Birds and other wildlife are especially threatened by sea level rise, changes in fire regimes, and vegetative changes due to human caused climate change. Rising sea levels obviously affect shore birds, along with human infrastructure. Climate change is making a bad situation worse in the sagebrush-steppe ecosystems with dramatically increasing the fire/cheatgrass cycle. The replacement of native vegetation by invasive cheatgrass is exacerbated by wildfires, which in turn are a result of increased GHG emissions. The shift in ecosystem types is not addressed in the Draft EIS. The loss of native vegetation and habitat leads to decline in wildlife species such as sage grouse, sharp-tailed grouse, ferruginous hawks, burrowing owls and others. Human Health Spokane Audubon is also concerned that the impacts from increased rail traffic, especially coal trains, would have on the human health of residents of Spokane County. The combination of Pacific Coast terminals, the TRRR, and the development of Otter Creek would lead to a much higher number of freight trains per day than is estimated in the Draft EIS. Diesel particulates as small as 2.5 microns, known as PM 2.5, have a proven track record of causing severe respiratory problems and even death from long-term exposure and are now listed as a known carcinogen. During winter inversions, Spokane’s PM 2.5 can already exceed 244% of National Air Quality Standards. Given that increased diesel traffic across 50 miles of Spokane County will lead to increased idling of locomotives and increased PM 2.5, the EIS needs to address the human health impacts and associated costs, especially in urban areas. Legality Finally, the EIS needs to

address the legality of the leasing. Under the Montana constitution, citizens have a right to a clean and healthy environment. It would appear that the TRRR and a massive coal mine that pollutes the air and water of the state would be in violation of that right. For the above reasons, Spokane Audubon urges the STB to select the no-action alternative. Sincerely, Greg Gordon, Conservation Chair, Spokane Audubon (on behalf of Spokane Audubon)



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converting it into an industrial zone. The cascading impacts to wildlife species that result from the building the railroad and coal development are significant and need to be fully addressed in the EIS.

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