

November 11, 2013
Gonzaga University
502 E. Boone Ave
Spokane, WA 99202

US Army Corps of Engineers, Cowlitz County, Washington Department of Ecology WA

Dear Washington Department of Ecology,

We're writing in the hopes that the effects of increased coal train traffic will be considered in the Environmental Impact Statement (EIS) for coal terminal in Washington State. An increase in traffic would be problematic on several fronts, including potential health, economic, and environmental concerns. Our current home of Spokane, WA will be one of the most affected by the building of this terminal. Spokane is what is known as a bottleneck for coal trains, meaning that several different rails will converge in these locations before separating again to their various destinations. Our town has even earned the nickname "the funnel" due to the immense amount of train traffic it sees.

According to a report prepared for the Western Organization of Resource Councils, if all nine proposed terminals were fully operational and at projected capacity, the city of Spokane could see a dramatic increase in train activity by 2022. Currently Spokane experiences an average movement of 46 freight trains per day, a number that could soon increase to over 130 per day or 5.42 trains per hour. With an average wait time of 6-7 minutes for each individual at a railroad stop, this increase could have negative effects on many aspects of our lives.

In one study, taken in regards to the Gateway Pacific terminals, Whatcom County predicted 2-3 hours of additional countywide delays per day should the proposed terminal go through. These delays will directly endanger lives when emergency response vehicles are continually stopped at crossings to wait for a train. Some towns even have plans to construct additional fire departments for either side of the tracks to address the potential influx of coal trains. In the US, from 2010 to 2011 alone coal shipments increased from 81.7 to 101.3 millions tons, and the congestion from this point onward will rise exponentially with the additional terminals. The proposed terminals in the Pacific Northwest are projected to export as much as 75 million tons of coal by 2017 and up to 107 million by 2022. It is the rising congestion caused by the increased coal train traffic that will threaten the economic and environmental health of many communities.

The economic effects should also be considered while the EIS is being conducted. Firstly, the increased train traffic due to increased coal train traffic will affect the quality of the train tracks. In 2017, it is projected that there will be an average of 9.2 trains per day throughout the system of coal trains from the point the coal is loaded to when it is unloaded. However, by 2022 this number is projected to double to 21.2 trains. This substantial increase will cause a quicker degradation of the train tracks that have not seen this much traffic. Secondly, there will need to be an increase in the number of overpasses and underpasses to accommodate the increase in train traffic. This will also be a huge cost to the local and state governments, and it should be

considered. Thirdly, by increasing the use of otherwise vacant (or nearly vacant) train tracks, there will need to be an influx of the safety measures that are taken around the tracks and station. This could include, but not limited to, chain link fences, increased security, extra patrol of security personnel, and warning signs. All three of these examples should be considered while the EIS is being completed. It should also be noted and investigated how these expenses will be paid for. If there is an increase in taxation of state and local residences, it should be determined how much. If taxes are not increased, it should then be investigated where the money is coming from and how decreases in the programs it robbed will affect the community. The EIS will be an extensive project to undertake, but these economic effects should be considered while it is being conducted.

Furthermore, the environmental effects of increased train traffic should be considered in the environmental impact statement. Firstly, your agency should investigate increased engine emissions. Many of the sections of the considered railway are single track. With increased train usage, an increase in bottlenecks will occur resulting in increased idling times. Therefore, more diesel emissions will be produced. Besides increased train idling times, automobile traffic will also be more prone to delay. At rail and road intersections, cars and trucks will have to stop more on a daily basis and thus idle more. An increase in idling time will mean an increase in engine emissions. After idling, trains will also to have speed up again. This demanding, high-energy process will also result in more diesel emission fumes. Engine emissions are harmful to human health and to the surrounding environment, thus should be investigated in your study.

Besides air quality, engine emissions are important to consider because they contain known greenhouse gases such as carbon dioxide. Greenhouse gases contribute to global warming. In this way, your agency should evaluate not only the local effects but also the global consequences of increased train traffic. Another environmental effect your agency should investigate are the effects of building underpasses and overpasses to mitigate train traffic. Building these structures can result in adverse environmental effects such as increased invasive plant species and erosion. These effects can be severely detrimental to the local environment.

As demonstrated above, the effects of increased coal train traffic will be detrimental to the environment and thus should be investigated in your study. The economic and public health effects should also be considered. We hope that your agency will consider our suggested issues with regard to the EIS.

Thank you for your time,
Keegan Malany
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