

Mr. Randel Perry
U.S. Army Corps of Engineers, Seattle District
C/O GPT/BNSF Custer Spur EIS Co-Lead Agencies
1100 112th Avenue Northeast, Suite 400
Bellevue, Washington 98004

Subject: EIS Scoping Comments from Livingston, MT

Dear Mr. Perry,

It has come to the attention of the Livingston City Commission that the development of one or more proposed coal export terminal projects in Washington or Oregon may result in a substantial increase in train traffic through our community. We would like to take the opportunity to comment on the potential impacts these projects would have on Livingston during the environmental impact scoping period for the Gateway Pacific Terminal in Cherry Point, Washington. As one of the largest proposed ports on the West Coast, we believe this project would have substantial impacts in Livingston. We respectfully request that you consider these impacts to our community as you undergo the remaining EIS process, and also ask that you examine the cumulative impacts of all of the proposed export terminals.

Livingston has historically been a railroad town, with the Montana Rail Link line cutting along the edge of the downtown district before ascending Bozeman Pass. According to Montana Rail Link, we currently experience an average of 15 trains each day. Already, residents experience traffic delays, particularly on the 5th Street crossing and Bennett Street crossings (we have one underpass constructed on North B. Street). Any additional train traffic would certainly exasperate these delays and adversely affect transportation from one side of town to the other. More importantly, there could be serious health and safety implications with emergency service vehicles incurring delays while crossing the tracks. Both our emergency medical services and fire stations are located on the south side of the tracks, with no services on the north. The only way an emergency service vehicle could get to the north side when moving trains have the crossings blocked is through the B. Street underpass.

We are also concerned about the possible impacts on health that would result from an increase in coal train traffic. Both an increase in idling cars and trucks waiting at rail crossings and train pollution threaten Livingston's air quality. Specifically, the increase in diesel fumes from train engines pose significant risks to human health. With the railroad tracks so central to our community, we believe these risks deserve serious attention. Numerous peer-reviewed studies document the potential harm associated with exposure to diesel fumes, including increased risks of cancer, cardiopulmonary mortality, pulmonary inflammation, and increased severity and frequency of asthma. We believe this data must be looked at closely when analyzing the costs from increased train traffic to communities along the rail line.

Livingston is an exceptionally windy city. For this reason especially, we are concerned about the movement of coal dust from the areas surrounding the tracks and the health impacts it has when inhaled. Coal dust consists of toxic heavy metals and has been associated with numerous negative health effects, including chronic bronchitis, emphysema, and pulmonary fibrosis. It seems highly likely that an increase in coal train traffic would result in an increase of serious health problems in Livingston. Although surfactants are supposedly used by all mining facilities, this regulation is not actively enforced, and there is still dust produced and lost as admitted by information previously found on BNSF's website.

Another concern is the noise from train horns. Citizens have complained about train noise for a long time, and though we would like to implement a quiet zone that would consist of safety improvements so trains would not be required to blow their horns, we again lack city funding for this. While most think of noise as purely an inconvenience, it has been shown to cause sleep disturbance and resultant health problems, as well as the exacerbation of mental health disorders.

Lastly, we believe it is worth evaluating the economic impact that increased train traffic would have on Livingston. While we greatly appreciate railroad jobs and the economic benefits these bring to our community, it would be worth exploring how many jobs would actually be gained locally with increased train traffic, and how many businesses may be hurt by the resulting inconveniences, health and safety concerns, and noise.

We ask the Corps to consider these potential serious effects on Livingston in the course of evaluating the Gateway Pacific Terminal and other similar projects that would increase coal train traffic through our community. We furthermore believe that a cumulative, programmatic EIS is the only appropriate way to assess the impacts of building these West Coast ports. The City of Livingston stands ready to assist with this process in any way.

Sincerely,

Frances Stewart, landowner

P.S. I have personally witnessed the cloud of coal dust engulfing these rail cars as they sit at the crossings in Livingston. This same toxic dust that we are breathing also falls into the Yellowstone River as the trains roar over the bridges. Please investigate this seriously poisonous phenomenon and see to it that all environmental regulations and protections are strictly enforced. Thank you for your efforts on our behalf. J.