

Declaration of Support for Coal Use & Development

WHEREAS, coal represents the most abundant source of energy in the United States of America; and

WHEREAS, coal is one of the most reliable and affordable source of fuel for electric generation; and

WHEREAS, consumers, businesses, communities and service providers need affordable energy more than ever, in this time of economic uncertainty, and stand to benefit from affordable and reliable coal-based electricity; and

WHEREAS, the United States holds more coal reserves than any other nation, and Montana is home to the largest coal reserves in the United States with nearly 1/3 of the estimated recoverable reserves; and

WHEREAS, Montana's annual coal production is currently only 1/20 of a percent of our estimated recoverable reserves and, at our current rate of production, would take over 1,600 years to exhaust Montana's coal reserves; and

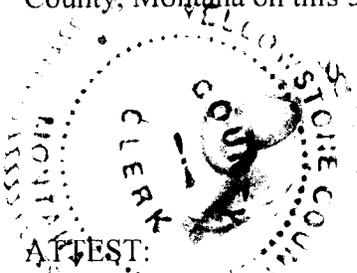
WHEREAS, development of Montana's coal resources will create thousands of new jobs and provide millions of dollars in tax revenue for state and local government; and

WHEREAS, the coal reserves in Montana can meet the demands of the domestic market and earn revenue for the State of Montana by being exported to foreign markets via west coast ports; and

WHEREAS, coal generated electricity has increased by 183% since 1970, while emissions from coal-based power plants has been cut by 75% per generation unit;

NOW, THEREFORE BE IT RESOLVED, that the Board of County Commissioners for Yellowstone County supports the continued use and development of coal-based power in the United States and supports the expansion of additional shipping capacity in existing ports in order to allow for the sale of Montana resources to emerging markets.

PASSED AND ADOPTED by the Board of County Commissioners, Yellowstone County, Montana on this 5th day of June, 2012.



ATTEST:

Jeff Martin
Clerk and Recorder

BOARD OF COUNTY COMMISSIONERS
YELLOWSTONE COUNTY, MONTANA

John Ostlund, Chairman

James E. Beno, Member

Bill Kennedy, Member

Resolution Number 7701

A resolution of the Missoula City Council to request that the U.S. Army Corps of Engineers prepare a comprehensive Programmatic Environmental Impact Statement (PEIS) on the cumulative impacts of new coal export terminals in Washington and Oregon and hold public hearings in Missoula, Montana and other communities that will be significantly impacted from coal that will be transported by train from the Powder River Basin in Montana and Wyoming to terminals along the Pacific Coast.

Whereas, currently, there are four coal-export terminal projects pending before the Corps: the Gateway Pacific Terminals ("GTP") site at Cherry Point, Washington; the Millennium Bulk Logistics ("MBL") site at Longview, Washington; the Oregon Gateway Terminal at the Port of Coos Bay, Oregon; and the Coyote Island Terminal site at the Port Morrow, Oregon. Additional permit applications are anticipated for a Kinder Morgan project at the Port of St. Helens, Oregon, and the RailAmerica proposal at the Port of Grays Harbor, Washington. Additionally, existing export terminals at port facilities in British Columbia are already receiving coal shipments and are considering expansions of their own; and

Whereas, taken together, the announced capacity of the planned U.S. projects is approximately 150 million tons of coal per year (compiled by Northern Plains Resource Council through press releases on each proposal). Operating at full capacity, these plans would mean approximately 60 coal trains – each about a mile and half long – moving through the Pacific Northwest, every day, year round. Many of these trains will pass through Missoula, Montana, and will potentially result in a significant adverse effect on our community that should be considered in any environmental review of these proposals.

Whereas, to ensure each individual permitting action accounts for the significant cumulative impacts of and mitigation for multiple proposed northwest coal export terminals, we believe that the Corps of Engineers must first prepare a PEIS that carefully analyzes the combined impacts of multiple, similar coal export terminal proposals.

Whereas, such analysis is allowed for, and most likely required, under the National Environmental Policy Act (NEPA). Under Section 1508.25(a)(1) and (2) of the Council of Environmental Quality's NEPA regulations, this environmental review must collect, analyze, and consider connected and cumulative actions for any federally supported project. Further, "cumulative" and "similar" actions should be discussed within a single environmental impact statement, necessitating the development of a PEIS.

Whereas, The railroad tracks and rail yard cut through a significant portion of the City of Missoula. In particular, the crossing at Greenough and Madison could cut off the Lower Rattlesnake neighborhood from vehicle by pedestrian travel, not to mention emergency services, item trains and increased traffic will result in additional emissions of air pollutants including greenhouse gases.

Whereas, any environmental analysis of these proposals must consider the negative effects that burning the large volumes of coal would have on the climate. Domestic demand for coal in the Powder River Basin has been rapidly declining. As a result, this coal will be shipped overseas to Asia, where it will permanently shape the developing energy markets there. With access to our cheap coal, countries in Asia will be induced to build new coal-fired power plants instead of transitioning to cleaner energy sources. This will lock in reliance on coal as a source of energy for the life of these power plans (thirty plus years), with an astronomically negative effect on climate change.

Now therefore be it resolved that the Missoula City Council requests that environmental reviews of these proposals consider the effects on the City of Missoula and other impacted communities.

Be it further resolved that we urge the U.S. Army Corps of Engineers to conduct a comprehensive programmatic EIS that includes an analysis of all of the indirect and cumulative environmental impacts, including the impacts on Montana communities, from all proposed coal ports in the Pacific Northwest.

Be it further resolved that we request that U.S. Army Corps of Engineers hold a public hearing in Missoula, Montana.

Passed and adopted this 21st day of May, 2012.

Attest:

Approved:

/s/ Martha L. Rehbein
Martha L. Rehbein, CMC
City Clerk

/s/ John Engen
John Engen
Mayor

(Seal)



Missoula City Council

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July 17, 2012

Chairman Olson and committee members,

Thank you for the opportunity to join you by phone today. By way of background, I serve on the Missoula City Council where I represent 10,000 constituents in Ward 1—a ward that is bisected by the Montana Rail Link mainline and rail yard. I chair the council's Conservation committee and formerly chaired the council's Public Safety and Health Committees, both of which have oversight roles relative to public and environmental health matters in our Missoula.

Currently, on average, 15 trains pass through the heart of Missoula every day. (Much to my chagrin, not a one of them are passenger trains, but that's a discussion for another day.) Even at the rate of 15 trains per day, I frequently receive complaints from my constituents about intolerable levels of diesel exhaust, noise, possible coal dust, and traffic congestion at a major at-grade crossing at the mouth of the Rattlesnake Valley. Indeed, the Madison/Greenough crossing sees about 5,000 vehicles a day and is one of only two ingress/egress routes from the Rattlesnake Valley into downtown Missoula. It's not uncommon to receive reports of individual trains blocking this crossing in excess of ten minutes.

I want to thank Montana Rail Link for recently installing auxiliary power units in their engines, which helps reduce idling times and emissions, but idling still occurs, as does high levels of noise from the rail yard, train whistles at the at-grade crossings, traffic congestion, and reports of unacceptable levels of diesel emissions and fumes. These current levels of impacts remain unmitigated, so my concern relative to increased rail traffic through my community is that additional impacts will also go unmitigated. As a concrete example of this, we could certainly initiate the process of adopting a quiet zone through Missoula to address train whistles, but to implement the project would cost our residents several hundred thousand dollars to install the necessary at-grade crossing equipment. The need to do so, though, will become ever more acute with a predicted exponential increase in coal train traffic, and I have little enthusiasm for creating special improvement districts or increasing taxes to mitigate the impacts caused by those outside our community.

Resolution 7701, adopted by the Missoula City Council on May 21, 2012, urges the U.S. Army Corps of Engineers to develop a comprehensive, programmatic environmental impact statement for the proposed coal export terminals in Oregon and Washington. Such an analysis would not only examine impacts at the physical location of the proposed facilities, but would look at all of the upline impacts from the export terminals to the source of the coal in the Powder River Basin. I believe that communities throughout Montana should know the impacts of coal train traffic if and when the export terminals are operating at full capacity. To do otherwise is shortsighted and a disservice to those we represent.

Don't get me wrong, I'm about as outspoken an advocate of freight and passenger rail in Montana as you'll find. But as a local elected official, I want to make sure that those responsible for mining and shipping coal

through Montana bear the burden of mitigating any adverse impacts they cause in my community--be they environmental, economic, or social impacts. And make no mistake, this is a social justice issue. The residential neighborhoods that adjoin the rail yard in Missoula are some of the poorest and low income in my community. For any of you familiar with Missoula, there is a pretentiously named subdivision in Missoula's south hills called Mansion Heights. You'll find no Mansion Flats along the rail yard, so, once again, the economically disadvantaged will end up bearing the brunt of the impacts from increased train traffic in Missoula, and that, too, is unacceptable to me.

At some point in the near future, rail lines in Montana will reach a saturation point requiring major upgrades to infrastructure. I have no doubt that if there is money to be made, MRL and BNSF will make the necessary investments to increase rail capacity; I have no such confidence that out of goodwill they'll build grade separated crossings, enhance at-grade crossings to be quiet zone-compliant, or move rail yards out of residential areas to mitigate adverse impacts. Without a doubt, economic benefits will accrue through upgrading rail infrastructure and ongoing operation of coal trains, but at what cost?

So whether it's by means of the Army Corps of Engineers conducting a programmatic EIS or possible analysis and mitigations mandated by the U.S. Surface Transportation Board, communities in Montana need answers and assurances that we're not going to be left picking up the tab for millions of dollars in mitigations. The history of the state of Montana is writ large with individuals and corporations quick to turn a buck but just as quick to let the rest of us pick up the tab for cleaning up their messes and mitigating their impacts. We can do better, we must do better, and let's work together to actually do better in the future.

Thanks for the opportunity to join you today.

Sincerely,

/x/ Dave Strohmaier

Dave Strohmaier
Missoula City Councilman, Ward 1

Nowakowski, Sonja

From: Jason Wiener [JWiener@ci.missoula.mt.us]
Sent: Tuesday, July 17, 2012 12:58 PM
To: Nowakowski, Sonja
Cc: Dave Strohmaier; brycebennett1@gmail.com; cwilliams@montanadsl.net
Subject: Coal train traffic comments

Please pass this comment to the ETIC for their meeting in Billings today.

Good afternoon.

I am sorry that I cannot join the committee by phone. I am in a meeting of Missoula's Metropolitan Planning Organization this afternoon and we are making some budget decisions that I need to be present for.

My Council district of about 11,000 residents in northeast Missoula is bisected by the existing Montana Rail Link main line and adjacent to the existing train yard. We live with the consequences of the existing industrial activity of the railyard each day. We get by but I also get a good number of people writing about the noise, emissions and traffic blockages from the current level of activity. In fact, the trains are one of the main things that constituents write to me about.

There are benefits to Missoula from this industry. There are also impacts. As it stands, I am hard-pressed to even quantify those impacts when constituents raise the issue to me, let alone mitigate real impacts to my constituents' health and well-being. Increased train traffic due to coal exports will exacerbate the impacts we are experiencing now and I'd be an irresponsible representative of my constituents to ignore those potential future impacts when there is an opportunity to avoid or, at least, mitigate them at the outset of an extended program of coal exports. Therefore, I supported the resolution asking for a Programmatic EIS when it came before City Council and urge the legislature to take up its responsibility in this regard.

We have, at best, a host of unanswered questions about how the transportation of coal to new export terminals will impact Missoula. My constituents deserve clear answers to questions like how many more trains per day will be blocking streets they rely on for access and passing by their homes adjacent to the tracks. Thus far, there have been no clear answers to even basic questions about the volume of trains. We need these answers as well as a determination of what mitigation will be required so that the export of coal and the greater profits from both its mining and transportation are not merely made at the expense of Montanans along the way.

Please do your due diligence about the transportation impact of increased coal exports and get the mitigation needed to not degrade the health and well-being of the Montanans you and I represent in place at the outset of this large industrial project.

Regards,
J.

Jason Wiener, Alderman, Ward One

1122 Jackson St.

Missoula, MT 59802

Nowakowski, Sonja

Subject: FW: Hi Sonja.....good talking with you this morning....hope your trip to Billings was 'uneventful'

From: Terry Whiteside [<mailto:twhitesd@wtp.net>]

Sent: Friday, July 13, 2012 12:49 PM

To: Nowakowski, Sonja

Cc: Whiteside, Terry

Subject: Hi Sonja.....good talking with you this morning....hope your trip to Billings was 'uneventful'

Hi Sonja: I was attending the Montana Rail Service Competition Council meeting yesterday in Helena and was asked if I could attend the ETIC meeting on Monday and Tuesday in Billings. Unfortunately, I am doing a presentation in SK, Canada and have to fly on Monday - so sorry. I look forward to meeting with your committee at some future meeting

Background: Whiteside & Associates and G.W. Fauth & Associates just completed a study entitled "Heavy Traffic Ahead" Rail Impacts of Powder River Basin Coal to Asia By Way of the Pacific Northwest Terminals and this report is available at www.heavytrafficahead.org

This report was commissioned by the WORC - the Western Organizational of Resource Councils.



Our Goal, in this study, was to develop a factual predicate of the announced coal volumes anticipated at the 9 proposed and/or under construction sites on the PNW coast and get the conversations initiated that need to be initiated between all of the stakeholders - coal mining companies, city and towns, state government, legislature, coal shippers, other rail commodities shippers, etc. The movement of coal anticipated is unprecedented.

The origins studies included the Canadian ports of Prince Rupert (Ridley), Westshore (Vancouver) - Roberts Banks, North Vancouver - Neptune, Cherry Point, WA (Bellingham), Longview, WA - Millennium, Grays Harbor, WA - Hoquiam, Coos Bay, OR - Mitsui, St. Helens, OR - Westward and Boardman, OR - Port of Morrow.

What our study did was take the volumes and build them back into the rail system across WA, ID and into Montana. We then built models to segment the rail traffic onto the system and looked at line-by-line/segment by segment analysis for both the 5 year (2017) and the 10 year (2022) time periods. The projected Annual PRB to PNW coal tons (short tons) are up to 75 MM tons by 2017 and up to 170 MM tons by 2022 which translates to between 22 to 58 additional trains per day through the Billings area and 28 to 63 trains per day in Spokane, WA. To put that in perspective if we take a look at all of the grain traffic that moves to the PNW - corn, soybean, wheat, barley, grain, dry peas, dry beans, cottonseeds, etc. volumes are just over 38 MM tons per year.

One of the critique of this report has been that it unrealistic to believe that all of the proposed capacity of the 9 terminals will ultimately be built - however if we look at the two terminals that are under construction and undergoing permitting - Cherry Point and Longview - together they plan to ship over 100 MM per year.

This is the first analysis that we know of that quantifies the tonnages (and trains) that will be moving over the rail line segments. We also included the Signal Peak bituminous coal movements to Westshore in the analysis. There are future capacity issues on the rail system that will be faced as the volumes ramp up. BNSF has in the press in the last few days indicated that they don't foresee any capacity issues and they are just getting to pre-recession traffic levels. However, the Washington DOT in their Rail Freight Study 2009 - the Rail Plan and forecasts looking at 2010-2030. Many of the impacted railroad tracks (BNSF routes across Washington) are already at, near or exceed capacity and the existing infrastructure needs significant upgrades and improvements in order to handle the existing traffic and relieve existing congestions and be mindful that the 2009 Washington DOT study was not anticipating increased export coal movements.

Terry Whiteside
Whiteside & Associates
3203 Third Avenue North, Suite 301
Billings, Montana 59101
Email: twhitesd@wtp.net
Phone: 406-245-5132
Cell: 406-671-8153

Date

City or county officials

Community

Address

City, MT Zip

Dear _____:

The Montana Rail Service Competition Council (MRSCC) has noted your community concern about the likely increase in railroad traffic through (community name) should Montana coal exports to Asia be increased. The MRSCC has directed that I send you this letter as a means of letting you know how the MRSCC views your concerns in the context of our mission and Montana's needs.

The MRSCC was created by the Legislature on 2005 to work with all interested parties to advance the competitiveness of Montana railroad service as a way to help insure that commerce via railroad can help develop the Montana economy and create jobs and economic growth. The MRSCC, in order to address that over-arching goal, tries to address not just rail service, but also railroad infrastructure.

The MRSCC, as a public body, is concerned that community transportation and safety needs are given due consideration as railroad activity increases. We think that there is no reason why community transportation, safety and business needs AND the needs of statewide business development and economic growth cannot BOTH be adequately addressed.

Montana sees the increased movement of Montana coal to Pacific Northwest ports for loading to reach rapidly growing Asian markets as a significant economic opportunity for Montana – an opportunity which should lead to growth of high quality mining and transportation jobs and also growth of tax base that can benefit ALL Montanans. Because of our location, Montana has a competitive transportation advantage over other US coal when it comes to serving Asian markets.

Our state needs to take advantage of that, but in doing so needs to be sensitive to not only the social, economic and environmental impacts of the increased mining itself (which are addressed under law by the mine permitting processes), but also to the community/transportation impacts of the movement of the coal by rail through many Montana communities, including (name of community).

The community and transportation challenges of this likely increase in coal movement need to be given due consideration and appropriate mitigation activities need to be considered and addressed.

As those legitimate issues are considered, however, the MRSCC does not want to see strident coal opponents take advantage of these issues in their effort to completely stop the growth of coal mining in Montana. As noted, the jobs, economic growth and tax base enhancement attendant to increased coal mining activity are too important to our state. In Montana we believe that we can accomplish energy development and also "do it right."

Insofar as (name of community) seeks to solve the transportation challenges related to increased coal movement by and through (name of community), the MRSCC stands ready to lend an ear to your concerns.

It is worth noting that similar concerns may evolve as the state seeks to move more Montana agricultural products/commodities to market by rail and also increased movement of other energy forms to market by rail (such as bio-mass, and refined oil products). We stand ready to consider those issues in the future, as well.

For now, we are hopeful that appropriate adjustments and mitigations can address the issues of concern in your community as it relates to anticipated increases in Montana coal movement. Doing that, while at the same time accomplishing growth in quality jobs, economic activity and taxes, is the Montana way ...neighbors helping neighbors ... developing our economy while "doing it right." We look forward to successful partnerships that produce all these good things for Montana in a way that is compatible with your legitimate community concerns.

Sincerely,

Mike O'Hara
Chair
Montana Rail Service Competition Council

**Meetings**

[Meeting Schedule](#)
[Agenda & Reports](#)

Previous Years

[2009](#)

Details

[Council Duties](#)
[Membership](#)
[Subcommittees](#)

Contact

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[RSCC Home](#)

RSCC Duties

The rail service competition council shall perform the following duties:

- (a) promote rail service competition in the state that results in reliable and adequate service at reasonable rates;
- (b) develop a comprehensive and coordinated plan to increase rail service competition in the state;
- (c) reevaluate the state's railroad taxation practices to ensure reasonable competition while minimizing any transfer of tax burden. The reevaluation of the state's railroad taxation practices should include but is not limited to a reevaluation of property taxes, taxes that minimize highway damage, special fuel taxes, and corporate tax rates;
- (d) develop various means to assist Montanans impacted by high rates and poor rail service;
- (e) analyze the feasibility of developing legal structures to facilitate growth of producer transportation investment cooperatives and rural transportation infrastructure authorities;
- (f) provide advice and recommendations to the department of transportation on the department's activities under 60-11-113 through 60-11-116;
- (g) coordinate efforts and develop cooperative partnerships with other states and federal agencies to promote rail service competition;
- (h) act as the state's liaison in working with Class I railroads to promote rail service competition; and
- (i) promote the expansion of existing rail lines and the construction of new rail lines in the state.



The Council shall report to the 2009 Legislature on its activities and its progress in performing the duties listed above.

The council shall cooperate with and report to any standing or interim legislative committee that is assigned to study or has oversight duties for rail service competition issues.

The council must be compensated, reimbursed, and otherwise governed by the provisions of 2-15-122.

The council is attached for administrative purposes only to the Department of Transportation, which may assist the council by providing staff and budgetary, administrative, and clerical services that the council or its presiding officer requests.

Staffing and other resources may be provided to the council only from state and nonstate resources donated to the council and from direct appropriations by each legislature.

RAIL SERVICE COMPETITION COUNCIL

Executive Appointments

Walt Ainsworth
Knowledge of the Trucking Industry
Helena
Term Ends: January 1, 2015

Carla Allen
Knowledge of Class II Railroads
Denton
Term Ends: January 1, 2015

John DeMichiei
Knowledge of Transportation for the Coal Industry
Billings
Term Ends: January 1, 2013

Mayor Jerry Jimison
Knowledge of Class I Railroads
Glendive
Term Ends: January 1, 2013

Russell Hobbs
Knowledge of Transportation for the Wood Products
Industry
Columbia Falls
Term Ends: January 1, 2015

Doug Miller
Knowledge of Transportation for the Mineral Industry
Troy
Term Ends: January 1, 2013

Michael O'Hara, Chair
Knowledge of Transportation of Farm Commodities
Fort Benton
Term Ends: January 1, 2013

Legislative Appointments

Senator Jonathan Windy Boy
Box Elder
Term Ends: July 1, 2013

Representative Tom Berry
Roundup
Term Ends: July 1, 2013

Statutory Appointments

Department of Revenue Director
Dan Bucks

Department of Agriculture Director
Ron de Yong

Department of Transportation Director
Tim Reardon

Governor's Office of Economic Development Chief
Business Officer
Evan Barrett

Coordinator

Gloria O'Rourke
Montana Economic Development Services
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gloria@montanaeds.com

Administered by

Rail, Air Quality & Studies Section
Rail, Transit, and Planning Division
Montana Department of Transportation
406-444-6116
Email contact

Spring Creek Coal Supporting Our Economy⁽¹⁾

Montana Taxes and Royalties

\$44.4 million

\$11.8 million⁽²⁾

> \$56 million

Montana Business and Community Contributions

> \$17 million

Federal Taxes

\$37 million

Average Compensation
246 Full Time Employees
\$107,000/year



⁽¹⁾ Excludes 50 percent non-operating interest in Decker Mine; excludes private royalties

⁽²⁾ Share of federal taxes back to the State

Terminal Expansions = Montana Economic Development!

Jobs

Roughly—every million ton increase in production adds 10 full time employees (\$1.1 million in compensation per million tons)

Increased Taxes and Royalties to Montana

Every ton produced generates > \$3 in taxes and royalties to State (higher as coal prices increase)

Increased Taxes and Royalties to Federal Government

Over \$2 per ton in federal taxes and royalties

Capital Improvements

Increased tonnage requires new trucks, loaders, handling equipment, etc

Volume

- Currently MRL averages 15 total trains per day, of which 2.5 are loaded coal trains and 2.5 are empty
- Potential future volume is determined by capacity. Studies indicate that with significant infrastructure investment capacity could increase by an additional 8 loaded and 8 empty trains per day
- Potential capacity is estimated to be a fraction of the number of trains quoted by various concerned citizen groups
- Increased volume is not limited to coal. Due to population growth, increased consumption, driver shortages and rising diesel costs; more freight will likely be moved by rail

Dust

- Coal dust issues are important due to concerns for employees, the communities served and infrastructure
- Coal dust has primarily been confined to areas close to the mines. The BNSF requires the mines to spray cars with a topping agent (commonly called surfactant). This combined with chute loading has been proven to significantly reduce coal dust events
- Studies have proven that dust is virtually eliminated at locations beyond the mines loading area with the use of topping agents
- Missoula county health officials have confirmed there are no adverse air quality issues related to coal dust.

Diesel Emissions

- A freight train moves a ton of freight an average of 457 miles on a single gallon of fuel
- One freight train is the equivalent of 350 semi-trucks
- MRL has invested over \$30 Million in the past seven years to reduce diesel emissions and improve fuel efficiency by purchasing new highly fuel efficient and low emission locomotives and installing auxiliary power units on our locomotives to reduce engine idling

Crossings

- MRL's goal is to minimize impact to the communities served while working to limit crossing delays
- Goal is 10 minutes
- In studies conducted; delays averaged 8-9 minutes
- MRL works closely with emergency response personnel to ensure awareness of crossing delays
- An 800 number is available to connect concerned citizens with our dispatch staff; 800-498-4838

Economic Impact

- MRL employs over 900 people from Huntley, MT to Sandpoint, ID
- Nearly 90% of employees are union with an average annual wage of \$67,000
- Total payroll in 2011 was \$63 million
- 124 MRL jobs and \$9 million of payroll were directly attributed to moving coal trains in 2011
- With an increase of 8 additional loaded and 8 empty trains per day, employment levels would increase by nearly 500 jobs and \$40 million in payroll
- Montana Rail Link paid nearly \$9 million in property tax to the state of Montana in 2011; employees paid nearly \$2 million in state income tax

From: Jim Carlson [mailto:jcarlson@co.missoula.mt.us]
Sent: Friday, June 29, 2012 1:08 PM
To: John Engen
Cc: Ben Schmidt; Ellen Leahy; Steve King
Subject: Re: Coal dust

Members of the City Council asked the Health Department to try to determine what contributes to the settled dust near the rail yard and how much of that is coal dust. The analysis conducted is best characterized as a screening and the report is attached in its entirety. It indicates that coal is present in a range of one to five percent in settled dust sampled.

From an air pollution perspective, settled dust is much less of a hazard to health than particles that are so fine that they remain suspended in the air until they are brought to ground by rain cloud formation, fog, or frost.

The health-based standards (National Ambient Air Quality Standards) by which we measure acceptable risk from particulate are the Federally established PM 2.5 and PM 10 standards. We have not violated these standards in Missoula since about 1990.

PM 2.5 is comprised almost entirely of combustion particulate such as wood smoke and diesel exhaust. PM 10 is larger and includes the PM 2.5 fraction plus larger particles including road dust. We have conducted chemical analysis and source apportionment of both pm 2.5 and pm 10 in Missoula in the past to determine the main sources of each type of regulated particulate. The second type of standard that exists in the air quality regulatory arena are emission standards. Specific emission standards vary by source.

In the case of Montana Rail Link and coal dust, there is no indication that they are violating any standard (ambient or emission) nor is there any indication that coal dust is a source of any significant contribution to ambient PM 10 or PM 2.5 in the Missoula air-shed.

I would be happy to meet with them to discuss this if they want.