COMMUNITYWISE BELLINGHAM
informing the conversation

GPT/BNSF Custer Spur EIS Co-Lead Agencies January 19, 2013

Request to Evaluate Reducing Harmful Emissions

Communitywise Bellingham has been identified by the EIS Agencies as a Key Stakeholder. We have been active in developing research and suggesting process for the last two years. Our focus is local, Whatcom County and Bellingham. This is one in a series of comments on specific aspects of issues.

Many of the submitted comments by concerned citizens and members of the professional healthcare community, including the Whatcom Docs coalition, have noted in their comments that diesel particulate matter is associated with:

- impaired pulmonary development in adolescents;
- increased cardiopulmonary mortality and all-cause mortality;
- measurable pulmonary inflammation;
- increased severity and frequency of asthma attacks, ER visits, and hospital admissions in children;
- increased rates of myocardial infarction (heart attack) in adults;
- increased risk of cancer.
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These citizens have asked to co-lead agencies to evaluate these risks as part of the GPT's environmental impact statement. Communitywise Bellingham echoes these concerns.

Furthermore, we assert that given the GPT train route passes entirely through residential, recreational and business areas of Bellingham, we believe it is vitally important to study the differential pollution impacts of Tier 4 locomotive emissions versus prior emission standards. The differential impacts of Tier 4 emission standards may be even more profound on the Bellingham population given that a second active rail siding is likely to be constructed in the center of Bellingham, subjecting large numbers of residents to significant additional emissions from the trains idling on the siding area.

Communitywise respectfully requests the co-lead agencies to determine if requiring Tier 4 locomotives to service the GPT would significantly decrease health risks as part of the environmental impact statement or any health impact analysis.

Tier 4 Locomotives

Coal unit trains are the heaviest in the industry routinely using 4-6 locomotives depending on length and grade factors. The 2004 Tier 4 standards for diesel locomotives enforce similar standards on locomotives as those which other industries (and individual car owners) have been subjected to for decades. The standards represent about a 90% reduction in the release of health hazard particulate and NOx. Tier 4 technology is available today. The GPT post-permit issuance construction schedule suggests that trains could start as early as late-2017, almost 3 years after the Tier 4 standard has been required on new and rebuilt locomotives. The

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dirtier engines, however, are grandfathered in until they need to be rebuilt which could be a long time. SSA representatives have publicly stated that they intend to use Tier 3 engines.

It should be noted that locomotives prior to Tier 4 do not have similar active control components and so are not subject to objective testing. This means that emission rates are unlikely to be the “at time of manufacture” ideals that quickly become degraded without a high standard of aggressive maintenance practices. Figures 1 and 2 include recent photographs of a typical coal unit train leaving the Bow siding on its way to Bellingham (the power units at both ends).

We believe such an evaluation is well suited for application to other cities given the large number of densely populated areas through which the trains will pass.

RR Locomotive Pollution Controls

Class 1 railroads lost their hard fought protection from standard pollution controls in 2004 and became subject to EPA Tier 4 standards. The simple math of avoiding regulation for years while every other source in the country cleaned up eventually made locomotive emissions such a huge nonpoint contributor to pollution that even congressional allies could no longer defend exemption. The RR lobby was able to hold off implementation for an additional 10 years. Tier 4 controls include active components similar to those individual car owners have paid for on their personal vehicles for decades. This description is from a diesel industry reference site.[1]

"On May 11, 2004, the EPA signed the final rule introducing Tier 4 emission standards, which are to be phased-in over the period of 2008-2015 [69 FR 38957-39273, 29 Jun 2004]. The Tier 4 standards require that emissions of PM and NOx be further reduced by about 90%. Such emission reductions can be achieved through the use of control technologies—including advanced exhaust gas after treatment...."

Tier 4 is available today

The reluctance Class 1 railroads have always had to spending anything they are not forced into is widely recognized. There is no indication that any of them will ramp up the required transition before the end of 2014. This is a matter of choice. The Houston Port Authority, a public agency, knows it has a bad diesel pollution problem and rather than waiting until 2015 has contracted to rebuild its fleet of locomotives (and tugs) to Tier 4 standards starting this year - 2013.[2]

We request that the EIS agencies follow the Houston Port Authority’s lead and identify a process to require that only Tier 4 locomotives service GPT in the event the terminal is built.

Thank you.

Photographic illustrations follow.

[1] Deiselnet is an industry reference site maintained on the web which includes easy to access data abstracted from voluminous government documents. The site lo text and tables of Tier comparisons can be found at the nonroad standards page here and the

[2] Described in Houston Business Journal at the here

Unit Train Departing from Bow Siding February 12, 2012- LeadPower - 06:53

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