

**Gretchen Rupp
221 Lindley Place
Bozeman, MT 59715**

November 20, 2012

US Army Corps of Engineers, Seattle District
GPT/Custer Spur EIS
1100 112th Ave. NE, Suite 400
Bellevue, WA 98004

Re: Scoping Comments, GPT/Custer Spur EIS

To Whom It May Concern:

I write to request that the Army Corps of Engineers (ACE) prepare an area-wide (“programmatic”) Environmental Impact Statement concerning coal transport from the Powder River Basin of Wyoming and Montana, through the Northwest to the potential new export facilities on the coast of Washington and Oregon. I further request that this analysis include a comprehensive Health Impacts Assessment. I understand that ACE already plans to examine the environmental impacts of one potential new port; this request is to broaden the topical scope and the geographic coverage of the planned analysis.

As an environmental engineer whose career has spanned more than 30 years, my concerns are global, regional and local. I request that your analysis address these questions:

- Should the increased coal export come about, we can foresee global climate impacts from the increased emissions of greenhouse gases, particular carbon dioxide. What will be the nature, magnitude and severity of these impacts?
- In Montana, we already have fish-consumption advisories regarding wild fish caught in virtually every waterbody statewide, because of mercury. How much more mercury should we anticipate entering our environment with the extraction and burning of coal, as proposed? What are the likely health effects?
- The Northwestern communities through which trains pass will experience doubled (at least) train traffic. How much coal dust is likely to blow off open coal cars, what are its characteristics and to what extent would it compromise the pulmonary and cardiovascular health of citizens? Could buildup of coal dust within track ballast increase derailments along the transport corridors?
- What increases in locally-generated air pollution should we anticipate for the communities along the rail corridors, and what would the effects be? Locomotive exhaust emissions and auto traffic idling at blocked crossings are of particular concern. Which communities along these corridors will be pushed into Clean Air Act noncompliance by the increased rail traffic?

- What delays should be expected at rail crossings along the transport corridors? What will the impacts to emergency response be? What will be the loss in productivity in the communities affected?
- Finally, there are quality-of-life concerns. Some towns are effectively “cut in two” by rail tracks. How would the passage of thousands more rail cars each day affect the quality of life in those places?
- Noise is both a health issue and a quality-of-life issue. Frequent loud noise is not just an annoyance, but a health hazard. What kinds of health impacts from increased noise should we anticipate from the coal-export project? What can be done to mitigate these impacts?

Because of the widespread potential impacts, and the fact that they affect both human health and the natural and human environments, I request that the COE analysis be comprehensive, cumulative and connected, and include a full Health Impacts Assessment. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Gretchen Rupp". The signature is written in a cursive, flowing style.

Gretchen Rupp, P.E.