



June 8, 2016

Millennium Bulk Terminals EIS
c/o ICF International
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Seattle, WA 98104

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Dear Ms. Butorac, Ms. Placido, and Ms. Guy:

Thank you for the opportunity to comment on the Draft Environmental Impact Statements (DEIS) for the proposed expansion of the Millennium Bulk Coal Terminal in Longview,

Washington, which is projected to handle up to 44 million metric tons of coal a year with 24/7 operations for 30 years.

The terminal would generate up to 16 trips by loaded and unloaded, mile-and-a-half long trains along rail corridors in Washington, Oregon, Idaho, Montana, and Wyoming each day, and an estimated 1,680 transits of Panamax bulk vessels on the Columbia River.

We are members of the Safe Energy Leadership Alliance or SELA, a coalition of more than 165 elected local, Tribal, and state leaders from Pacific Northwest and British Columbia advocating for full assessment of risks and costs for significant expansion in coal and oil export. While we come from diverse communities, both rural and urban, we share core interests of protecting public health and safety, economic development, Treaty rights and cultural resources, and the environment in our communities.

Impacts from the proposal terminal will be carried across state lines along river and corridors. Increased rail and barge traffic will have direct and cumulative impacts on safety, traffic, noise, air and water pollution, and economic development not only in the immediate vicinity of the terminal in Longview, but also communities in four states.

Our specific concerns about the DEIS include the following:

- **The geographic scope of analysis for many of the DEIS elements is too narrow to capture impacts to impacted communities and resources along rail and barge routes.** For example, the analysis and mitigation of noise and economic impacts is focused only on Kelso, Longview, and Cowlitz County despite the fact noise and traffic impacts along rail and barge lines will impact communities in five states. Further, the DEIS acknowledged disproportionate impacts to Minority and Low-Income Populations within 1 mile of the project area and 0.5 mile of the affected rail lines in Cowlitz County. Again

this, underrepresents the full scope of the impact, which extend to communities beyond the borders of Cowlitz County.

Impacts to protected areas along rail and barge lines are a particular concern. The Columbia River Gorge National Scenic Area is just one of many protected and sensitive areas that would be negatively impacted by coal trains that would service this facility. Wetlands, wildlife refuges, state parks, tribal fishing areas, critical fish, wildlife and plant habitat, recreation, and scenic resources would be harmed by the impacts of this facility, its trains, and the expansion of rail lines needed to accommodate the increase in rail traffic.

- **The DEIS notes that without improvements to rail infrastructure to expand capacity, the Proposed Action could result in significant impacts on rail and vehicle transportation. However, no investments in infrastructure improvements are proposed as mitigation outside the local project area.** Instead, proposed mitigations along rail main lines are focused on coordination and notification, shifting the burden for costly infrastructure improvements for crossing safety and traffic to communities like ours.
- **The DEIS downplays impacts from coal dust on public health and environment, and does not reflect the impacts communities along rail lines are already experiencing.** Every loaded train that would deliver coal to this facility would pass through the Columbia River Gorge National Scenic Area in uncovered cars. Communities along the Gorge already report issues with deposits of coal dust along rail lines from existing coal trains, where contaminants can be washed in to the river. The DEIS projects that “average and maximum deposition of coal dust on the BNSF main line in Cowlitz County [is] estimated to be above the nuisance thresholds at 50 and 100 feet,” but then finds that these impacts are “not significant” because no state or federal standards apply. While application of surfactant is a proposed mitigation, this treatment only reduces but does not eliminate coal dust coming off of open coal cars. The proposed requirement to establish a coal dust complaint system only applies in Cowlitz County, and the requirement to share information with the Columbia River Gorge Commission once a year does not address the physical impacts of coal dust or provide any certainty they will be addressed.

- **The DEIS acknowledges impacts to fish populations and to Tribal fishing access across rail lines, but fails to fully analyze or propose mitigation to avoid significant adverse impacts.** The DEIS notes that to mitigate impacts on access to tribal treaty fishing areas, the Applicant may initiate a process with Columbia River Inter-Tribal Fish Commission officials to discuss and identify mitigation measures prior to beginning operations. This does not provide certainty that impacts to fishing access will be avoided or mitigated.
- **The analysis of economic impacts is focused on the local project area and Cowlitz County, and this does not fully capture the regional economic impacts of increased traffic congestion, over-capacity rail lines, air and water pollution, and noise along rail lines and the Columbia River.** Farmers are already experiencing difficulties in getting commodities to market. Within communities along the rail line, traffic congestion, pollution, and noise will deter economic development.

The DEIS fails to provide a full and accurate assessment of direct and indirect impacts on traffic, public safety, air and water quality, protected areas, fishing access, and economic development across the region impacted by related rail and barge traffic. Even with these shortcomings, the DEIS still identifies several significant adverse impacts extending far beyond the local project area with uncertain mitigation. Many of the proposed mitigations fall into the category of monitoring or coordination, raising the concern that the burden of costs for physical mitigation will fall to local communities along rail and barge lines. From the perspective of regional economic development, the proposed project represents a risky investment in a declining commodity with significant impacts to our health and environment. The final EIS must provide a more robust analysis of full costs and risks of this proposal to communities across the impacted region.

Thank you for considering our comments.

Signed,

Millennium Bulk Terminals EIS

June 6, 2016

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