



SEATTLE CITY COUNCIL

Millennium Bulk Terminals EIS
c/o ICF International
710 Second Ave, Suite 550
Seattle, WA 9810

To Whom It May Concern:

Thank you for the opportunity to comment on the Draft EIS for the proposed Millennium Coal Terminal, 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 massive Panamax bulk vessels on the Columbia River.

While Seattle is 130 miles from the proposed terminal in Longview, the increased rail and barge traffic will have direct and cumulative impacts on safety, traffic, noise, air and water pollution, and economic development in our community and communities along rail lines and the Columbia River.

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 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 5 states.

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. Impacts do not stop at the Cowlitz County line.

- **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. Communities downstream of the proposed coal terminal such as Seattle are also directly impacted by the congestion created on the rail line elsewhere as it makes it more difficult and costly for goods to ship in and out of Seattle.
- **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 main lines are focused on coordination and notification, shifting the burden for costly infrastructure improvements for crossing safety and traffic to local communities along the line. Seattle will be directly impacted by the lack of necessary investment elsewhere on the rail corridor as it will make it harder to make shipments to and from our city.
- **The DEIS acknowledges impacts to Tribal fishing access and fish populations, but fails to fully analyze or propose mitigation to avoid significant adverse impacts. The DEIS does not address impacts to treaty fishing rights.** Further decision-making on this proposal should not move forward without a robust assessment of impacts to Treaty fishing rights.

We strongly urge you to revise the EIS to:

- expand the geographic scope of the DEIS to provide an accurate assessment of the full range of direct and indirect impacts of this proposal on traffic, public safety, air and water quality, and economic development across the impacted region,



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- recognize and mitigate the impacts on downstream communities of increased congestion throughout the rail network,
- assess impacts to Treaty fishing rights, and
- shift the mitigation burden for costly infrastructure improvements to the project proponent.

We believe once these corrections are made, it will become more apparent that this project should be denied a permit.

Sincerely,

Council President Bruce Harrell

Councilmember Tim Burgess

Councilmember M. Lorena González

Councilmember Kshama Sawant

Councilmember Sally Bagshaw

Councilmember Lisa Herbold

Councilmember Debora Juarez

Councilmember Rob Johnson

Councilmember Mike O'Brien