

June 12, 2016

Re: Comments for the Millennium Bulk Terminal Draft Environmental Impact Statement (EIS)

To: Washington Department of Ecology, Cowlitz County, US Army Corps of Engineers

CC: Governor Jay Inslee, Governor Kate Brown

To Whom It May Concern:

Thank you for this opportunity to comment on the Millennium Bulk Terminals (MBT) Draft Environmental Impact Statement (DEIS). MBT proposes to locate a 44 million ton per year coal export facility in Longview, Washington. This proposal would require that sixteen coal trains travel through the region on a daily basis (eight full and eight empty). The DEIS highlights the significant concerns associated with massive increases of rail transportation that would be caused by this project. This increase would overload the capacity of the rail lines, cause major traffic concerns in Northwest communities, and exacerbate coal dust and diesel pollution in both urban and environmentally sensitive areas.

Goods transported to and from the City of Milwaukie share these same regional train tracks. Coal burned abroad yields pollution that returns to the Pacific Northwest and enters the air we breathe, the water we drink, and the food we eat. Our citizens spend time recreating and working in areas through which these uncovered coal trains will pass, including Portland, Oregon, and the Columbia River Gorge National Scenic Area. Regrettably, the DEIS does not do a complete or adequate job in disclosing these concerns. Impacts to Oregon are not even considered. Even so, the DEIS concedes a number of significant and unavoidable impacts that would by themselves warrant denial.

The City of Milwaukie passed Resolution 55-2012 on October 16, 2012. It includes the following “Findings” that support our request for your selection of the “No Action Alternative”:

- “According to findings from the Environmental Protection Agency and research in other communities, coal trains are likely to cause significant negative effects on public health, economy, and air and water quality.”
- “Coal dust contains toxic heavy metals, including mercury, arsenic, and lead, all known to have serious adverse health effects, especially on children. These heavy metals are linked to increases in cancer, bronchitis, emphysema, black lung disease and birth defects.”

- “This coal dust will have a negative effect on local businesses, homes and natural areas.”
- “Mercury and other toxic air pollutants produced from burning the coal in Asian nations have been shown to adversely affect the Northwest's air, water, fish, and wildlife.”
- “The City of Milwaukie is a leader in the fight for clean air and against the negative impacts from climate change, as evidenced by signing onto the US Mayors Climate Protection Agreement. The City has also committed to reducing its environmental impacts in its day-to-day operations. The Milwaukie Sustainability Team (S-Team) is a committee made up of representatives from various City Departments that meets bimonthly to discuss sustainability issues. This group created the Sustainable City Plan, which was approved and adopted by City Council via resolution in March 2009. This Plan guides the City's actions in reducing the environmental impact of the City's day-to-day operation. The plan has four target action areas, namely: Waste Reduction, Energy & Fossil Fuel Consumption, Procurement, and Ongoing City Commitment & Education. The City has further committed to participate in the Portland General Electric's renewable energy clean wind green tag program as the first Platinum Level City, and instituted a Green Power Challenge to encourage residents to participate.”

The following Action sections of Resolution 55-2012 further underscore our concerns:

**Section 2.** Allowing trains or barges to pass through the State of Oregon transporting coal in the volume and of the type planned is not compatible with the environmental future desired by our City residents.

**Section 3.** All applicable federal, state, and local laws protecting public health, safety, and air and water quality should be enforced to protect the citizens of Milwaukie and the state of Oregon from the adverse effects of coal trains and barges.

**Section 4.** The City fully supports Governor John Kitzhaber's request that a federal agency prepare a programmatic and comprehensive environmental impact statement (EIS) under the National Environmental Policy Act to look at the unprecedented number of coal export proposals pending in the Pacific Northwest, as well as the potential effects in this country of the use of coal in Asia. Now is the time for a programmatic EIS, before substantial and irreversible commitments of resources are made.

**Section 5.** The City of Milwaukie joins the call for review of a comprehensive independent Health Impact Assessment before any permits are approved for any proposed coal export project.

In the City's November 2013 MBT scoping comments, we called upon you to analyze, examine alternatives, and outline proposed mitigation for all potential negative impacts listed in City resolution language above. Furthermore, we posed these questions:

- 1) How do coal exports align with local, state, and federal sustainability plans and vision?
- 2) How many and which neighborhoods will the trains pass through?
- 3) Roughly how many people live in these affected neighborhoods?
- 4) How many schools will the trains pass?
- 5) How many commercial districts will the trains pass through?
- 6) How many and where are the at-grade crossings?
- 7) Are the crossing located near hospitals, police stations, fire departments?
- 8) Are there any at grade crossings that currently create traffic bottlenecks?
- 9) Do any of these communities have a prior history of air quality issues in the past?
- 10) What impacts will coal dust have on municipal water quality, especially if water source is groundwater?
- 11) What impacts will coal trains have on residential and commercial property values and tax base?
- 12) How will the anticipated delays during train crossings impact transit between key city locations and emergency response times?

While some of these questions were partially answered, some were not addressed at all. We ask that all these questions be answered in the Final EIS.

For all the reasons stated above, we request that you select the "No Action Alternative." If this project moves forward, we request that a comprehensive, independent Health Impact Assessment, including a public review process, be completed before the Final EIS is released.

Thank you for your consideration of these comments.

Sincerely,

Mayor Mark Gamba