



Missoula City-County Health Department
AIR POLLUTION CONTROL BOARD

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November 17, 2016

Millennium Bulk Terminals NEPA EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

To Whom It May Concern:

On May 17, 2012, the Missoula City-County Air Pollution Control Board (Board) submitted public comment to the Army Corps of Engineers regarding scoping for an environmental impact statement for the numerous proposed coal export terminals in Oregon and Washington, including the Longview terminal. The Board administers matters pertaining to the Missoula City-County Air Pollution Control Program in order to require the use of all available practicable methods to reduce, prevent and control air pollution in the City and County.

Recognizing the Missoula Valley and surrounding communities of Clinton, Turah, Bonner, Milltown, East Missoula, Frenchtown and Huson could experience significant adverse effects from the proposed operation of these terminals, the Board requested that a comprehensive programmatic environmental impact statement be conducted and include analyses of the terminals' indirect and cumulative impacts on Missoula and other Montana cities and counties. It is evident from reviewing the Longview National Environmental Policy Act (NEPA) Draft Environmental Impact Statement (DEIS) that our request was not given consideration by the Army Corps of Engineers.

The Millennium Bulk Terminals-Longview (MBTL) NEPA DEIS acknowledges that the sole purpose of the proposed terminal is to ship coal delivered via rail from western states to Asia, and that the coal is destined to be burned in Asia. However, the DEIS then fails to consider any of the impacts from the shipping and burning of the coal on areas not immediately adjacent to the proposed terminal.

In examining the project's cost, the DEIS includes in its analysis the cost for shipping coal from the coal mines to the proposed terminal (S. 2.2). This suggests the Army Corps of Engineers is willing to consider financial costs across the breadth of the project, but does not afford the same consideration to the environmental costs.

We will address three of these costs:

1.0 Air Quality.

The Missoula Valley lies in a bowl surrounded by hills and mountains, and experiences frequent air inversions that trap pollutants. Fine particulate (PM_{2.5}) levels in Missoula have come very close to exceeding the 24-hour PM_{2.5} National Ambient Air Quality Standard (NAAQS).

Missoula's rail yard/switching yard bisects the downtown area, with thousands of residents living within a half mile of the tracks. By significantly increasing the current number of trains through Missoula, the Proposed Action would exacerbate an already sensitive air quality situation and expose thousands of Missoula residents to additional diesel exhaust from rail traffic. The DEIS recognizes that the purpose and viability of the proposed terminal relies on shipping coal from the Powder River Basin to the proposed terminal for export to Asia. However, the DEIS improperly neglects to examine the air quality and human health impacts of shipping that coal through Montana communities to the proposed terminal.

2.0 Rail Safety and Capacity.

While the Corps' NEPA DEIS focuses only on the area immediately surrounding the proposed terminal, the MBTL State Environmental Policy Act (SEPA) DEIS map (SEPA DEIS Ch. 5, Figure 5.1-1) illustrates that trains transporting up to 44 million metric tons per year (MMTPY) of coal from the Powder River Basin to the proposed terminal will go through our communities along the northern route. The DEIS projects that up to 16 trains per day (eight empty and eight full) will travel to and from the terminal (S. 6.1) and therefore also presumably along Montana rail lines. All increases in rail use increase risks of derailments and accidents across the cargo spectrum. Catastrophic derailments and accidents involving hazardous cargo affect air quality and endanger citizens' health and well-being. In addition, the City of Missoula has two at-grade crossings and two rail overpasses. Outside of the city, there are 10 additional at-grade crossings bisecting small communities along the rail line. Several have no alternative route for emergency response. Blocked rail crossings can lead to delayed response times for emergency vehicles, increased emissions from idling vehicles and decreased ability to quickly evacuate populations during disasters such as wildfires and toxic spills. The DEIS fails to address any of these potential impacts to Missoula communities from the construction and use of the proposed Longview terminal.

3.0 Climate Change.

Increases in CO₂ from burning coal in Asia via the Proposed Action will contribute to climate change globally and locally. However, the DEIS greenhouse gas

analysis only takes emission from the construction and operation of the proposed terminal into account. The document entirely neglects discussion of the local and global consequences of the combustion in Asia of these 44 MMTPY of coal. In addition, despite addressing local mitigation measures for air quality impacts, wetland impacts, etc. (Ch. 8), the document fails to list possible local mitigations to greenhouse gas emissions and the project's contributions to climate change.

The Proposed Action supports infrastructure for burning coal for another 30 years and is antithetical to the December 2015 Paris agreement made by 195 nations, including China, to seriously work to reduce the threats of climate change to the planet by reducing the burning of fossil fuels.

Because the DEIS does not consider the environmental costs beyond the site of the terminal, the sections on rail safety (S. 6.2), vehicle transportation (S. 6.3), air quality (S. 6.6), coal dust (S. 6.7) and greenhouse gas emissions (S. 6.8) are insufficient.

This conduct of the NEPA process is fundamentally flawed and inappropriately minimizes all of the project's potential environmental and transportation impacts. It is not possible to construct the proposed terminal without creating major environmental impacts outside the narrow study area defined by the DEIS.

In conclusion, the proposed coal export terminal would create significant adverse impacts to our community, our region and the planet that cannot be mitigated. Because of these unavoidable and significant adverse impacts and because of uncertainties and missing essential information in the DEIS, we ask that you select the NO ACTION alternative. Thank you for considering our comments.

Sincerely,



Ross Miller, Chair
Missoula City-County Air Pollution Control Board

ATTACH: Missoula City-County Air Pollution Control Board Request for a Comprehensive Programmatic Environmental Impact Statement for the Proposed Coal Ports on the Northwest Coast. May 2012.



May 17, 2012

Brig. Gen. John McMahon, Commander and Division Engineer
U.S. Army Corps of Engineers Northwestern Division
P.O. Box 2870
Portland, OR 97208-2870

Col. John Eisenhower
Commander, Portland District
U.S. Army Corps of Engineers
P.O. Box 2946
Portland, OR 97208-2946

Col. Bruce Estok
Commander, Seattle District
U.S. Army Corps of Engineers
P.O. Box 3755
Seattle, WA 98124-3755

Re: Request for a Comprehensive Programmatic Environmental Impact Statement for the Proposed Coal Ports on the Northwest Coast

Dear Brig. Gen. John McMahon,

On behalf of the people of the County of Missoula, the Missoula Air Pollution Control Board respectfully requests that you prepare a comprehensive programmatic environmental impact statement (PEIS) for the numerous proposed coal export terminals in Oregon and Washington. We also request that you hold public hearings in Montana in order to gather public testimony from all affected people along the proposed rail routes. Missoula and other Montana counties could experience significant impacts from proposed coal transport from the Powder River Basin in Montana and Wyoming to terminals along the Pacific Coast.

Currently, there are four coal-export terminal projects pending before the Corps: the Gateway Pacific Terminals site at Cherry Point, Washington; the Millennium Bulk Logistics site at Longview, Washington; the Oregon Gateway Terminal at the Port of Coos Bay, Oregon; and the Coyote Island Terminal site at Port Morrow, Oregon. Additional permit applications are anticipated for a Kinder Morgan project at the Port of St. Helens, Oregon, and the RailAmerica proposal at the Port of Grays Harbor, Washington. Additionally, existing port terminals at port facilities in British Columbia are already receiving coal shipments and are considering expansions of their own.

Taken together, the announced capacity of the planned U.S. projects is approximately 150 million additional tons of coal per year. Operating at full capacity, these plans would mean approximately 60 coal trains – each about a mile and a half long – moving through the Northwest, every day year round. These trains could pass through Missoula, Montana, and we believe, could result in a significant adverse effect on our community, which should be considered in any environmental review of these proposals.

Brig. Gen. John McMahon, Commander and Division Engineer
Col. John Eisenhower
Col. Bruce Estok
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Such analysis is allowed for, and most likely required, under the National Environmental Policy Act (NEPA). Under Section 1508.25(a)(1) and (2) of the Council of Environmental Quality's NEPA regulations, this environmental review must collect, analyze, and consider connected and cumulative actions for any federally supported project. Further, "cumulative" and "similar" actions should be discussed within a single environmental impact statement, necessitating the development of a PEIS.

The railroad bisects north Missoula. This results in stoppage of traffic flow on some of our streets, which are heavily used by people coming and going from work. Increased train traffic would cause much more frequent delays, resulting in additional emissions of pollutants from idling cars.

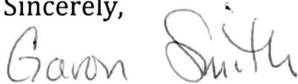
Citizens who live near the tracks already complain about the noise of train horns and coupling and are urging the city to install the necessary equipment at crossings to implement railroad quiet zones. Lack of funding constrains us.

In addition, the increased diesel exhaust would exacerbate our wintertime air quality problems, especially during air inversions. A large part of Missoula is located in an EPA designated air stagnation zone, and is dangerously close to exceeding current EPA PM2.5 standards. Increased diesel particulate matter and coal dust are serious concerns of people living in residential neighborhoods near the rail line.

Finally, any environmental analysis of these proposals must consider the negative effects that burning the large volumes of coal would have on air quality and climate. This coal would be shipped overseas to Asia. With access to our cheap coal, countries in Asia will be encouraged to build new coal-fired power plants, instead of transitioning to cleaner energy sources. This will lock in reliance on coal as a source of energy for the life of these power plants (thirty-plus years). Carbon dioxide, particulates and heavy metals such as mercury are carried back to North America on world-wide air currents and are currently found in Northwest rivers and mountain tops. Greenhouse gas emissions from the transport and combustion of coal will have an astronomically negative effect on the world's climate.

Please ensure that your environmental reviews of these proposals consider the effects on the community of Missoula and other impacted communities. Specifically, we urge you to conduct a comprehensive programmatic EIS that includes an analysis of all of the indirect and cumulative environmental impacts, including the impacts on Montana communities, from all proposed coal ports in the Northwest. We further request that you hold a public hearing in Missoula, Montana.

Sincerely,



Garon Smith, Ph.D.

Chair, Missoula City-County Air Pollution Control Board

cc: Missoula City Council, 435 Ryman, Missoula, MT 59802
Missoula Board of County Commissioners, 200 West Broadway, Missoula, MT 59802
Senator John Tester, 130 W. Front Street, Missoula, MT 59802
Senator Max Baucus, 280 E. Front Street, Missoula, MT 59802
Representative Dennis Rehberg, 301 E. Broadway, Suite #2, Missoula, MT 59802