



November 8th, 2016

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

Danette L. Guy, Project Manager
U.S. Army Corps of Engineers, Seattle
District 2108 Grand Boulevard
Vancouver, WA 98661

Dear Danette Guy and the Army Corps of Engineers,

Thank you for the opportunity to comment on the Draft Environmental Impact Statements (DEIS) for the proposed Millennium Bulk Terminal (MBT) in Longview, Washington. The MBT plan to export to Asia 44 million metric tons of coal each year is inconsistent with City of Portland resolutions and policies and we urge you to oppose MBT's proposed coal terminal.

Over the past four years, Portland City Council has repeatedly taken formal action to express its concerns about transportation of large volumes of fossil fuels their potential impacts to the communities that they move through, and the following resolutions relate directly to the proposed MBT project:

- Resolution #36962, adopted October 4, 2012: The City of Portland requests a comprehensive health impact assessment prior to approval of coal exports by any state, regional or federal agency.”
- Resolution #36959, adopted September 19, 2012: The City of Portland “opposes coal export on trains through its jurisdiction until the process of a programmatic, comprehensive, and area-wide Environmental Impact Statement, is completed.”
- Resolution #37168, adopted November 12, 2015: The City of Portland “will actively oppose expansion of infrastructure whose primary purpose is transporting or storing fossil fuels in or through Portland or adjacent waterways.”

This DEIS is severely limited. It is neither comprehensive, nor area-wide in scope. It fails to consider potential impacts to the people of the City of Portland, the State of Oregon, and many other affected jurisdictions. Additionally, this DEIS does not include a comprehensive health impact assessment or anticipate inclusion of one in the Final Army Corps EIS.

On Friday, June 3, 2016 there was a derailment and fire of a unit oil train in Mosier, Oregon. Today, groundwater remains contaminated, despite ongoing, costly clean-up operations. This alarming event, and the public health emergency that it caused, serves as a stark reminder of the potential for catastrophic when coal and other fossil fuels are transported through the City of Portland.

Large coal terminals and the transportation of coal to and from them have the potential for major local impacts on human health. Of great concern are coal dust emissions from uncovered rail cars, which can significantly degrade local air quality. Diesel emissions from locomotives powering heavy coal trains combine with coal dust released from uncovered coal cars, increasing the risk of asthma and other lung diseases, heart attacks, stroke and neurodevelopmental disorders. These impacts are compounded by a second wave of effects when the coal is eventually combusted, primarily in Asia, and prevailing winds carry the resulting air pollution to the Pacific Northwest. These impacts are not trivial: In the Columbia River basing more than 80 percent of the mercury pollution, a potent neurotoxin, is from overseas sources.

A Health Assessment and Valuation by Multnomah County demonstrates many risks, including the fact that long and frequent coal trains passing through at-grade crossings in Portland can lead to critical delays in emergency response times. Over 3,000 medical professionals and public health advocates oppose the MBT proposal.

The City of Portland supports economic activity that contributes to the health, safety and well-being of our residents and, that on balance, adheres to the principles of sustainable development and an overall reduction of carbon emissions. The DEIS demonstrates that the MBT project runs counter to these values.

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 and included in the Final EIS.

Thank you for consideration of these comments.

Sincerely,



Amanda Fritz

Commissioner, City of Portland

Charlie Hales



Mayor, Charlie Hales