



Board of County Commissioners Multnomah County

501 SE Hawthorne Blvd., Suite 600
Portland, Oregon 97214
Phone: (503) 988-3308
Email: mult.chair@multco.us

November 29, 2016

Millennium Bulk Terminals - Longview NEPA EIS
% ICF International
710 Second Ave, Suite 550
Seattle, WA 98104

To whom it may concern:

Thank you for the opportunity to comment on the NEPA Draft Environmental Impact Statement (DEIS) for the proposed Millennium Bulk Terminal (MBT) in Longview, Washington. The MBT plan to export 44 million metric tons of coal each year poses an acute risk to the residents of Multnomah County, Oregon, and I urge you to oppose the project.

The MBT plan would bring with it the potential for coal train fires; increased particulate emissions from locomotive exhaust and coal dust; congestion and collision along rail lines and waterways; and associated detrimental health outcomes including injury and death. As Chair and CEO of Multnomah County I have a responsibility to protect the health and safety of county residents. It is reasonable and prudent to ask that coal export projects demonstrate that they are not harmful to the public's health and safety before moving forward. We appreciate that Cowlitz County and Washington Department of Health are completing an Health Impact Assessment (HIA) for the project, and urge you to consider those findings once they are released. However, that HIA will not assess impacts to residents of Multnomah County, and the DEIS does not currently assess or mitigate any of the risks to the people of Multnomah County. The reality is that trains derail, as we witnessed recently with the near catastrophic oil train derailment in Mosier last year. We believe that these risks are significant and that this project will negatively impact the people and natural resources of Multnomah County.

I have serious concerns that fossil fuel transport in our state will further exacerbate environmental injustices faced by vulnerable communities living near rail lines. A Multnomah County Health Department analysis from February 2013 (attached for reference) found that almost one-third of Multnomah County's population lives within two kilometers of rail lines that may carry coal for this

project, and that about one in nine county residents live within 500 meters of these rail lines. A demographic analysis shows that people of color make up a larger portion of the population near rail lines than they do in the county as a whole. Communities of color in Multnomah County are already disproportionately suffering from environmentally related health impacts such as asthma without adding the increased burden of additional coal trains.

Finally, Multnomah County recognizes that changes in our climate will fall hardest on those who are already the most vulnerable members of our community, the same people the county serves everyday. Multnomah County is already seeing those impacts, with record heat over the past three summers causing spikes in emergency room visits. We have reached the point in history when we must turn toward the clean energy of the future, and the MBT project is an investment in the energy of the past. By our estimates, the annual greenhouse gas emissions associated with the burning of coal shipped through the MBT is over *ten times* the State of Washington's total allowed emissions in year 2030 under the EPA's Clean Power Plan. The project is a bad investment for the planet, and is a bad investment for the people of Multnomah County who will experience significant negative impacts without any real benefits. I request that you select the "No-Action Alternative."

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Kafoury". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Deborah Kafoury
Multnomah County Chair