



To: United States Army Corp for the proposed MBT project at Longview, WA.

November 29, 2016

Please accept these comments into the official record for the DEIS.

Economic Analysis:

Coal has been called a dead man walking by Kevin Parker of Deutsche Bank. It's an old technology being replaced by clean, renewable energies. The Asian market for coal has collapsed. Wood MacKenzie, coal industry consultant, and a former big champion for coal exports has now recently said "building new Pacific Northwest coal ports is now viewed as nothing more than a risky long-term bet." Feb. 2016.

US coal production in the last five years has been reduced by 40% or more. Utilities are moving to cleaner and cheaper energy sources. The market cap for the four largest coal producers combined is now less than \$150 million. It was \$34 billion in 2011. Three of the four companies are now in bankruptcy, including Arch. Arch used to own 38% of the proposed MBT but they relinquished it to Lighthouse Resources, formerly Ambre Energy on May 26, 2016.

Brad Plumer in Vox.com earlier this year said "The U.S. coal industry is imploding." Peabody, in 2011 made a "disastrous bet on Chinese coal demand." The Chinese economy had started to slow down by then.

Daniel Gross in Slate.com says that "We're witnessing something that we rarely see in America: the sudden and sharp collapse of a functioning industry," in the past five years the value of coal companies in the Dow Jones U.S Coal Index has plummeted 93%.

Jim Levesque in Platts Coal Trader said last month that "coal dropped to 23.8% of US utility-scale power generation in March as natural gas and renewables continued to grab a greater

market share, US Energy Information Administration data shows. Renewables continue to climb closer to coal's power output."

A private equity fund called Resource Capital Funds, based in the Cayman Islands owns Lighthouse Resources. They have no history or resources to build such a major project like the proposal. It would cost about \$650 million according to their own estimates. Do they have this capital to build the facility without massive public subsidies? They can't financially account for the negative impacts in the DEIS that they would have to mitigate.

In Japan, where some of this coal is projected to go, a study was done by Oxford University that shows a very high level of uncertainty for coal-fired power. Over-capacity in these markets makes for a risk of stranded assets. That can come from government policy changes as we are seeing in China or technology changes or both.

In China and Japan there is competition from renewables and nuclear energy. And since coal-fired energy is the biggest source of air pollution, carbon emissions and water pollution of all the energy types, which favors the capital market flows to renewables.

Even so-called clean coal technology is expensive and not so clean. Carbon capture technology in coal burning plants is 30-40% of the cost. It can't compete with other forms of energies according to Richard Martin in *TechnologyReview.com*.

What doesn't come out of the emission stacks ends up in the coal ash. Coal ash is well known as a very nasty toxin to humans. Where is the coal ash going to go from these coal burning plants? How well is it regulated? Does Japan have the land capacity to store coal ash? Will it be shipped to other countries that may have lax regulations? Is U.S. coal-burning and coal ash poisoning non-Americans? The DEIS doesn't even address coal burning emissions coming back to the Pacific Northwest on the jet stream full of mercury and many other toxic substances.

Bankrupt coal companies don't have to pay for cleanup of their mines. Tax payers do. The economic impacts of mined coal to burned coal are not worth the expenses of this proposal. Will MBT revenue-share with all the communities along the rail lines? Will BNSF or UP?

And what of the supposed taxes generated from the terminal if built that will benefit Washington State? Will it benefit the other states and Tribal Nations that are subject to coal and its problems rolling through their communities?

Will Longview be left with a terminal-to -nowhere as Portland and Los Angeles were in the 1990s?

In the Heavy Traffic Still Ahead (HTSA) study done in 2014 by Terry Whiteside and G. W. Fauth, who have a combined over 60 years of transportation expertise, it is stated that it's the communities along the rail routes who will pick up the tab for rail upgrades. Because the upgrades will likely need to occur in hundreds of communities and many of the upgrades will be

serious as in over and underpasses it could cost in the hundreds of millions of dollars. The upgrades figures don't include health impacts. The costs could easily be above the projected 45 million dollars or so in tax revenues.

It is extremely likely many rail communities can't afford major upgrades and won't be able to get federal Transportation Investment Generating Economic Recovery or TIGER funding.

Plus BNSF which dominates the N. route through Montana, Idaho and WA has received nearly \$800 million (pg. 15 of HTSA) from the federal government through the 2009 American Recovery and Reinvestment Act for rail related projects in Washington. Yes they would improve Amtrak service but they would also "significantly help BNSF facilitate the movement of coal to the proposed PNW export terminals, and could help BNSF and the other involved companies reap billions of dollars and profits," Pg. 16 of HTSA.

In the DEIS in chapter 5 of the Washington State SEPA on Operations the rail traffic increases relative to capacity the Idaho/Washington State Line-Spokane says that "All Proposed Action-related BNSF trains to and from the Powder River basin would move over this segment. This segment has two main tracks with CTC. Projected 2028 capacity without improvements is 76 trains per day. The capacity concerns for this segment extend beyond Washington State to Sandpoint, Idaho. This potential constraint is identified in the Washington State Rail Plan as a key potential chokepoint. Army Corp has not even looked beyond the actual facility site proposal. This is unconscionable considering the thousand of people who live up-rail who will be impacted by the proposal, if built.

The projected volume in 2028 is 122 trains per day, including Proposed Action-related trains in the Washington DEIS. The proposed action could add 16 trains to a segment that would exceed capacity under 2028 baseline conditions. Without improvements or operating changes, Proposed Action-related trains would contribute to congestion or delays on this segment, or the inability of BNSF to handle its rail traffic. It is expected that BNSF would make the necessary investments or operating changes to accommodate the growth in rail traffic, but it is unknown when these actions would be taken or permitted."

The above is the only mentioned specific segment of rail lines outside of Washington State in the DEIS. It's not even mentioned in the federal DEIS. In the fact sheet on rail transportation for the state DEIS: "Main line routes beyond Washington state: Without improvements, the added trains could exceed capacity for some segments." The facility does not exist in a vacuum, you have to take into account up-rail traffic, noise, safety, concerns, upgrades, finances and so forth. I am sending information about traffic in the hopes that Army Corp will consider expanding their study area to the coal mine source for the FEIS.

In HTSA, page 59 the report says, "BNSF's shortest PRB to PNW railroad route covers a distance of 1,135 miles, but the potentially impacted area is extremely broad covering a total aril

distance of over 4,000 miles. These railroad routes traverse many environmentally sensitive areas, such as Glacier National Park in Montana.

Many of the impacted railroad line segments already have significant rail capacity and congestion issues associated with current rail traffic, such as PNW imports and export intermodal container traffic and grain railroad traffic. As a result of these capacity and congestion problems, there are many areas which would require major upgrading and expansion of existing railroad tracks.”

Double tracking will be required in many places, the report also says, and much rail infrastructure would need to be upgraded or replaced. Double tracking is already happening in communities like Cheney, WA. Bridges are on the decline, many are old. The Federal Railroad Administration now allows officials in the U. S to report poor bridge infrastructure. I suggest the FEIS looks at anything reported in the travel area for rail for this new FRA program.

Yet BNSF and a few of their allies have testified at public meetings on the MBT proposal, that rail capacity is not a problem. It reached a height in 2006. You can't obviously look at rail capacity just in the context of coal. It has to be looked at with all types of rail traffic for capacity. We saw a bit of that in 2014 with the Surface Transportation Board's decision on getting fertilizer to market for farmers, the Cold Train lawsuit and others. Railroads make more money off of coal and oil transport and that, during part of 2014, became their priority. If grain and other modes of traffic are so important why haven't they worked on these upgrades to tracks much sooner? It's being done to facilitate more money making ventures for them since rail is a much more flexible way to get products like coal and oil to market instead of via pipelines.

In 5.1.8 of the DEIS it says, “Therefore, with existing infrastructure and using the methods to identify potential baseline rail traffic in 2018, the Proposed Action could result in a significant adverse environmental impact of rail transportation.” And HTSA concludes that Although BNSF has already secured millions in federal funding to upgrade its privately-owned track in Washington state. “Local governments would likely bear the brunt and burden of related local costs and would likely be required to spend hundreds of millions of dollars in related mitigation, litigation, debt and other costs associated with the necessary improvements to accommodate export coal traffic levels.”

Capacity issues will contribute to:

1. The sheer number of trains that will add more traffic to at-grade crossings for rail communities. The number of trains can produce negative impacts to businesses.
2. It will increase exposure to DPM and coal dust and thus, increase potential negative health impacts.
3. It will create more havoc for first responders and commuters.
4. It will create more noise for residents.

5. It will increase the chances for more derailments. Coal dust is a “pernicious ballast foulant” according to USDOT. It can weaken and destabilize tracks. Read the Dr. Dan Jaffe study on coal dust. The surfactants that are sprayed on it at the mine and put on again at Pasco still don’t keep all the coal dust off the roads and out of fields, rivers, lakes, communities, etc. And a huge swath of rail exists between the mines and Pasco. And about 150 miles of tracks exist between Pasco and the Columbia River, which allows more time for the surfactant to wear off. Friends of the Columbia Gorge have documented coal in the Columbia River and other places. They have photos of a company, called Hulcher, hired by BNSF, vacuuming coal dust off the banks of the Columbia River. BNSF has a new spray station at their yard in Pasco to spray coal trains, but they have sprayed coal trains since 2015 and the surfactant used still does not prevent all coal from leaving the hoppers. Neither does shaping the coal in a special position in the hopper. This has to be examined more carefully in the FEIS.
6. It’s not just coal traffic, it’s also traffic from oil trains to refineries and any facilities that may be built in the future, that may exceed the capacity. Plus Amtrak, grain trains, intermodal and other trains also run on these tracks. All of this traffic will increase the chance for a train derailment. It puts extra stress on tracks. Coal and Oil trains are the heaviest on the tracks. Coal trains release more diesel particulate matter than grain trains. Please see the Daniel Jaffe study from the University of Washington.
7. Global warming is likely to add to increased track stress according to a study by the University of Birmingham published in May, 2016.
8. Wildlife is barely talked about as far as rail impacts are concerned. Increased train traffic will negatively impact wildlife that need to cross tracks, drink or swim in water and eat food that may be contaminated with coal dust. Animals cross tracks for many reasons including migration, finding food and mating. Some herbivores will walk on tracks in the winter if the snow is very deep. And noise also negatively impacts many species of wildlife. Noise impacts are only noted for four non-marine species at the construction site when they should be considered for all wildlife outside of the study area and for the entire rail line. More trains mean more noise. These impacts to wildlife need to be considered in more detail in the FEIS.
9. The increase of CO<sub>2</sub> from coal and other train traffic and the facilities also increases the global warming in the world. It prolongs our fossil fuel dependence which we have to get off of in order to keep our climate from getting even warmer.
10. Pedestrians and bicyclists need to be considered at railroad crossings as well. They use them and there are hundreds of rail crossings with increased traffic.

In closing, please choose the no-action alternative. We will get no action from this proposal economically because of the long term decline of coal use in the world. Those who live along the rail lines get no jobs but we pick up the tab for just a few short construction jobs, no matter how good the pay is, and no matter how good the pay is for the few permanent jobs it creates. Jobs at any costs are a very poor economic model. The rail line communities get an enormous

amount of costs, with no benefit. It doesn't matter how much the Army Corp limits the scope of the DEIS. Up-rail communities still get all the negative impacts. The federal government needs to own up to that and acknowledge the other states in this process. Since Army Corp chose ICF International to write the DEIS I don't expect much in the way of a thorough FEIS so these comments are very similar to the comments made for the state SEPA process of which ICF also wrote the DEIS.

Please see the studies and articles linked below for further information.

Sincerely,

Laura Ackerman  
Organizer and Director  
The Lands Council  
Spokane, WA

### [Final Kyoto analysis shows 100% compliance](#)

Posted: 10 Jun 2016 06:50 AM PDT

All 36 countries that committed to the Kyoto Protocol on climate change complied with their emission targets, according to a new scientific study.

### [US Counties Could Gain \\$1 Million in Annual Health Benefits from a Power Plant Carbon Standard](#)

June 7, 2016

#### [Substantial road traffic noise in urban areas contributes to sleep ...](#)

Sep 11, 2012 ... A new study of **noise pollution** in Fulton County, Georgia, suggests that many residents are exposed to high noise levels that put them at risk of ...  
<https://www.sciencedaily.com/releases/2012/09/120911091353.htm>

#### [Road traffic noise linked to heightened risk of midriff bulge ...](#)

May 26, 2015 ... Road traffic noise is linked to a heightened risk of developing a mid-riff ... They were also asked about environmental **noise pollution** from road ...  
<https://www.sciencedaily.com/releases/2015/05/150526085736.htm>

[Cities try different tactics to regulate \*\*noise\*\*: Survey of \*\*noise\*\* ...](#)

May 23, 2016 ... The large difference is just one example of the diversity of laws regulating noise throughout the US The **Noise Pollution** Clearinghouse, ...  
<https://www.sciencedaily.com/releases/2016/05/160523113726.htm>

[Road traffic \*\*noise\*\* linked to deaths, increased strokes: Living in an ...](#)

Jun 23, 2015 ... Living in an area with noisy road traffic may reduce life expectancy. Research has ... A new study of **noise pollution** in ... read more. Strange & ...  
<https://www.sciencedaily.com/releases/2015/06/150623200112.htm>

[Traffic \*\*noise\*\* is dangerous for your health: Solutions exist for dense ...](#)

Jul 1, 2014 ... Traffic **noise** is the second biggest environmental problem in the EU, according to WHO. After air **pollution**, **noise** is affecting health the most.  
<https://www.sciencedaily.com/releases/2014/07/140701085328.htm>

[Ship \*\*noise\*\* extends to frequencies used by endangered killer whales ...](#)

Feb 2, 2016 ... One of the threats faced by today's oceans is underwater **noise pollution** from ships. Amazingly, the growth in commercial shipping has raised ...  
<https://www.sciencedaily.com/releases/2016/02/160202090531.htm>

[Negative effects of road noises on migratory birds -- ScienceDaily](#)

Nov 6, 2013 ... These include visual disturbances, collisions and chemical **pollution**, ... "  
Understanding the effects of road **noise** can help wildlife managers in ...  
<https://www.sciencedaily.com/releases/2013/11/131106113841.htm>

[\*\*Noise pollution\*\* impacts fish species differently -- ScienceDaily](#)

**Noise pollution** impacts fish species differently. Date: July 24, 2014; Source: University of Bristol;  
Summary: Acoustic disturbance has different effects on different ...

<https://www.sciencedaily.com/releases/2014/07/140724141614.htm>

[Air pollution and \*\*noise pollution\*\* increase cardiovascular risk ...](#)

May 20, 2013 ... Both fine-particle air pollution and **noise pollution** may increase a person's risk of developing cardiovascular disease, according to new ...

<https://www.sciencedaily.com/releases/2013/05/130520142745.htm>

[System for detecting \*\*noise pollution\*\* in the sea and its impact on ...](#)

Dec 16, 2010 ... A new EU directive on the sea has ruled that all member states must comply with a

set of indicators for measuring marine **noise pollution** before ...

<https://www.sciencedaily.com/releases/2010/12/101216095025.htm>

#### [Noise Pollution Negatively Affects Woodland Bird Communities ...](#)

Jul 24, 2009 ... A new study shows the strongest evidence yet that **noise pollution** negatively influences bird populations, findings with implications for the fate ...

<https://www.sciencedaily.com/releases/2009/07/090723142050.htm>

#### [Not just for the birds: Human-made noise has ripple effects on plants ...](#)

Mar 20, 2012 ... **Noise pollution** alters ecological services: enhanced pollination and disrupted seed dispersal. Proceedings of the Royal Society B, 2012 ...

<https://www.sciencedaily.com/releases/2012/03/120320195747.htm>

#### [Noisy Roads Increase Risk Of High Blood Pressure -- ScienceDaily](#)

Sep 11, 2009 ... Researchers have found that people exposed to high levels of noise from nearby ... But legislation regarding **noise pollution** is ... read more ...

<https://www.sciencedaily.com/releases/2009/09/090909203148.htm>

#### [Environmental Factors, Particularly Air Pollution, Increases Risk Of ...](#)

Apr 23, 2005 ... Exposure factors that are thought to compound the risk include passive smoking, air pollution, **noise pollution** and the chemical composition of ...

<https://www.sciencedaily.com/releases/2005/04/050422170441.htm>

#### [Study pumps up the volume on understanding of marine ...](#)

Dec 22, 2014 ... **Noise pollution** in the ocean is increasingly recognized as harmful to marine mammals, affecting their ability to communicate, find mates, and ...

<https://www.sciencedaily.com/releases/2014/12/141222131549.htm>

#### [Is Noise From Heavy Traffic Making You Fat? -- ScienceDaily](#)

May 26, 2015 ... Swiss Engineers Bring Acoustic Solution to **Noise Pollution**. Reuters (Aug. 29, 2013) — Swiss-based acoustic engineers are developing a ...

[www.sciencedaily.com/.../4cd41db4522867cf5ed1fa2dadb69c6c.htm](http://www.sciencedaily.com/.../4cd41db4522867cf5ed1fa2dadb69c6c.htm)

#### [Pollution](#)

**Noise pollution** induces hearing loss, high blood pressure, stress, and sleep disturbance.

Note: The above text is excerpted from the Wikipedia article "Pollution", ...

<https://www.sciencedaily.com/terms/pollution.htm>

[Researchers Find Everyday Traffic \*\*Noise\*\* Harms The Health And ...](#)

May 23, 2001 ... Even the low-level but chronic **noise** of everyday local traffic can cause ... on environmental stress, such as **noise**, crowding and air **pollution**.  
<https://www.sciencedaily.com/releases/2001/05/010523072445.htm>

[Noise distracts fish from their dinner -- ScienceDaily](#)

Feb 28, 2011 ... In many aquatic environments, **noise pollution** will often continue for much longer periods than the exposures used in this study, or occur ...  
<https://www.sciencedaily.com/releases/2011/02/110228183849.htm>

[Can you hear me now? Songbirds tweak their tunes in different ...](#)

May 30, 2011 ... The study is part of a growing field that looks at **noise pollution** and its effects on wildlife. Honking horns, blaring sirens, and roaring machinery ...  
<https://www.sciencedaily.com/releases/2011/05/110526114529.htm>

[Negative consequences of \*\*noise\*\* on overall health -- ScienceDaily](#)

Oct 29, 2013 ... The combined toll of occupational, recreational and environmental **noise** exposure poses a serious public health threat going far beyond ...  
<https://www.sciencedaily.com/releases/2013/10/131029220800.htm>

[Planes, trains and automobiles: Traffic \*\*noise\*\* disturbs sleep, affects ...](#)

Jun 8, 2010 ... The sound of passing trains caused the highest awakening and arousal probabilities ... But legislation regarding **noise pollution** is ... read more ...  
<https://www.sciencedaily.com/releases/2010/06/100608091848.htm>

[Chronic Illness Linked To \*\*Coal\*\*-mining Pollution, \*\*Study\*\* Shows ...](#)

Mar 27, 2008 ... "Residents of **coal**-mining communities have long complained of impaired health, " and researchers say "This **study** substantiates their claims."  
<https://www.sciencedaily.com/releases/2008/03/080326201751.htm>

[Coal-tar based sealcoats on driveways, parking lots far more toxic ...](#)

Apr 27, 2016 ... Of particular concern are the sealcoat products based on use of **coal** tar emulsions, experts say. **Studies** done with zebrafish -- an animal model ...  
<https://www.sciencedaily.com/releases/2016/04/160427151028.htm>

[Autism Risk Linked To Distance From Power Plants, Other Mercury ...](#)

Apr 25, 2008 ... A newly published **study** of Texas school district data and industrial ... Mercury- release data examined were from 39 **coal**-fired power plants and ...  
<https://www.sciencedaily.com/releases/2008/04/080424120953.htm>

[Recent mercury pollution on the rise, but quick to change, \*\*study\*\* shows](#)

Jun 29, 2015 ... A **study** using a 600-year-old ice core shows that global mercury ... Toxic metal mercury is emitted to the atmosphere from **coal** burning, mining, ...  
<https://www.sciencedaily.com/releases/2015/06/150629142147.htm>

[Mercury levels in Hawaiian yellowfin tuna increasing -- ScienceDaily](#)

Feb 2, 2015 ... especially emissions from **coal**-fired power plants and artisanal gold mining. ... "This **study** confirms that mercury levels in open ocean fish are ...  
<https://www.sciencedaily.com/releases/2015/02/150202151217.htm>

[US electricity could be powered mostly by the sun and wind by 2030 ...](#)

Jan 25, 2016 ... So MacDonald, who has **studied** weather and worked to improve ... and greenhouse gas emissions of various energy mixes, including **coal**.  
<https://www.sciencedaily.com/releases/2016/01/160125114231.htm>

[Better estimates of worldwide mercury pollution: New findings show ...](#)

Aug 12, 2015 ... While its increased burning of **coal** was known to exacerbate .... Recent Mercury Pollution on the Rise, but Quick to Change, **Study Shows**.  
<https://www.sciencedaily.com/releases/2015/08/150812131458.htm>

[Mercury levels in rainfall are rising in parts of North America ...](#)

Jan 27, 2016 ... with increased emissions of mercury from **coal**-burning power plants in Asia ... In the new **study**, researchers analyzed data from a network of ...  
<https://www.sciencedaily.com/releases/2016/01/160127101537.htm>

[Benefits associated with the reduction of mercury emissions far ...](#)

Feb 16, 2016 ... But that **study** is based on an extremely small subset of the population: ... But if you consider all of the benefits of reducing **coal**-fired power plant ...  
<https://www.sciencedaily.com/releases/2016/02/160216152020.htm>

[Carbon capture analyst: 'Coal should stay in the ground ...](#)

Dec 2, 2015 ... The U-M researchers have found that most **economic** analysis of carbon capture and storage, or CCS, technology for **coal**-fired power plants ...  
<https://www.sciencedaily.com/releases/2015/12/151202142317.htm>

[Carbon reductions won't hinder Chinese growth: Professor sees ...](#)

Feb 9, 2016 ... Professor sees **coal** use peaking within next decade, emissions dropping soon after ... being published by the journal **Economics**.  
<https://www.sciencedaily.com/releases/2016/02/160209121720.htm>

[Global mercury regulations to have major \*\*economic\*\* benefits for US ...](#)

Jan 5, 2016 ... The researchers calculated the projected U.S. **economic** benefits from ... to reduce mercury pollution from the country's **coal**-fired power plants.  
<https://www.sciencedaily.com/releases/2016/01/160105223542.htm>

[India Steps Back From 4 Proposed Coal-Fired Ultra Mega Power Plants](#)

[U.S. Taxpayers at Risk of Being Saddled With Coal Cleanup Bills](#)

Data Bite: Renewables, in U.S. Government's Latest Snapshot, Are Closing In on Coal

[On the Blogs: Failure of Texas Project Illustrative of Carbon-Capture Industry](#)

[BP: Record Drop in Global Coal Consumption in 2015](#)

[\*\*Philippines Government Steps Back From Coal\*\*](#)

[IEEFA Data Bite: West Australian Mine Owner Reports More Losses, Shows No Ability to Cover Clean-Up Costs](#)

[Dubai Solar-Project Bid Comes in Cheaper Than Coal](#)

The Economy of the 'Lucky Country' Is at Risk From Its Lack of Diversification