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MBTL NEPA Draft EIS

c/o ICF International

710 Second Avenue

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Seattle, WA 98104

To the Washington Department of Ecology and the United States Army Corps of Engineers:

I urge you to deny the 401 and 404 Clean Water Act permits for coal export on the Columbia River.

I am highly disappointed in the limited scope of the NEPA Draft Environmental Impact Statement concerning the Millenium Bulk coal terminal proposal, which fails to address the human and environmental health hazards represented by this project. The SEPA Draft Environmental Statement gave a much more comprehensive picture of the potential impacts and can serve as a model for broadening the scope of the NEPA DEIS.

Nevertheless, the NEPA DEIS clearly describes the potential hazards that would result from the coal terminal. It is these hazards that are an immediate concern to me and to other residents of Longview. I will quote from the DEIS and add my own comments.

Page 6.7. "Coal dust is a form of particulate matter and can affect air quality." The research on Black Lung disease indicates that this is a serious health hazard. It would be most severe for the workers employed on the site, diminishing the quality of the 135 jobs the terminal would create.

Page 6.7-4 Table 6.7-2 Coal Dust Total Suspended Particle Emissions Rates at Maximum Throughputs states that an average of 11.05 tons of coal dust per year is the figure for Total Suspended Particle Emissions.

Page 6.7-4 "Operation of the export terminal would result in coal emissions, including during the handling and transfer of coal related to rail unloading, shiploading, conveyor transfer, coal-pile development and removal, and wind erosion of coal piles." Emissions from freight trains also presents a regional hazard.

Page 7-27 "Fugitive coal dust particles would be would be generated by the export terminal through the movement of coal into and around the project area as well as during transfer onto vessels or from stockpiles in the project area." There have been significant comments from the medical community during the process for the NEPA DEIS and the SEPA DEIS indicating that this effect would indeed be hazardous to health.

Page 5.7-29 "Aquatic environments could potentially be affected by a coal spill, both physically and chemically." Page 7-26 [Fish could be subjected to] "impacts and related to alteration and removal of aquatic habitat, elevated turbidity, increased underwater noise, increased shading of aquatic habitat, leaks and spills affecting water quality, stranding from vessel wakes, and deposition of coal dust in the aquatic environment." The salmon populations in the Columbia River are already under stress from high water temperatures in the Columbia Estuary and these effects could be damaging to them.

The scope of my concern is indeed broader than the treatment of the subject in the NEPA DEIS. In order to meet the requirements of the Paris Climate Agreements it is preferable that the 44 million tons of coal that would be handled by the export terminal NOT be burned anywhere in the world. The resulting pollution would affect international and even local air quality adversely.

I recommend that the final EIS for this project includes a truly comprehensive discussion of the hazards of a coal terminal to the local community, along the railroad routes, and in the total global climate and air quality picture. For all the above reasons I oppose the Millenium Bulk Coal Export Terminal. In its current form the DEIS shows a distinct bias in favor of the industry position and such presentations can undermine citizens' trust in government agencies.

Sincerely,

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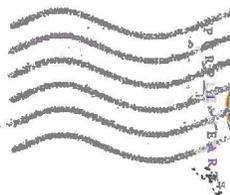
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