

U.S. Army Corps of Engineers
Seattle District Regulatory Branch, CENWS-OD-RG
Attn: Ms. Danette L. Guy
2108 Grand Boulevard
Vancouver, Washington 98661
NWS.MBTL@usace.army.mil

Washington State Department of Ecology
Attn: Federal Permit Coordinator
PO Box 47600
Olympia, Washington 98504-7600
Millenium.WQC@ecy.wa.gov

RE: Comments on Millennium Bulk Terminals, LLC Draft Environmental Impact Statement, Department of Army Permit (Clean Water Act Section 404 and Rivers and Harbors Act Sec. 10), and Clean Water Act Sec. 401 Water Quality Certification; NWS-2010-1225.

Dear U.S. Army Corps of Engineers and Washington Department of Ecology:

We appreciate the opportunity to comment on the Draft EIS, Department of Army Permit (Clean Water Act Sec. 404 and Rivers and Harbors Act Sec. 10), and Clean Water Act Sec. 401 water quality certification for the proposed Millennium coal export terminal in Longview, WA (NWS-2010-1225). Our city has concerns and is opposed to coal transport through the Columbia River Gorge National Scenic Area.

We support the “no action” alternative because we believe the project harms our health, safety, natural resources, air and water quality. For the reasons described below, we urge the U.S. Army Corps of Engineers (Corps) to revise the Draft EIS and deny the Department of Army Permit under Clean Water Act Sec. 404 and Rivers and Harbors Act Sec. 10, because Millennium’s project is not in the public interest. We also urge the Washington Department of Ecology (Ecology) to deny the Clean Water Act Sec. 401 water quality certification because the project harms water quality and would violate state water quality standards.

As an initial matter, the scope of the DEIS is completely insufficient. It ignores coal export’s impact on rail communities like ours.

The DEIS acknowledges that the proposed project would result in 16 more trains per day – 8 full of coal and 8 empty trains – into and out of the project area. However, the DEIS impermissibly focuses on very small areas of potential impact for its analysis of the adverse effects of the additional 5,840 trains that would run as a result of the project. Traffic delays from the additional trains – including delays for first responders – are not addressed outside of the immediate project area. Nor are the inevitable derailments that will occur due to increased train traffic addressed outside of the project area.

The DEIS ignores all impacts on the protected scenic, natural, recreation, and cultural resources of

the Columbia River Gorge National Scenic Area (NSA). The entire point of an EIS is to disclose all of the direct, indirect, and cumulative impacts of a proposed project. Excluding the foreseeable impacts on the protected resources of the Gorge is impermissible and baffling.

The DEIS does not analyze the effect on the Gorge of the additional 2,920 trains loaded with coal that would traverse the NSA per year. All of the full coal trains would run through the Gorge either on the BNSF tracks in Washington or on the Union Pacific tracks in Oregon since the other route to the project area cannot accommodate full coal trains. Thus, the extra train traffic is a foreseeable result of the project and must be addressed in the DEIS.

Increased coal train traffic would cause an increase in air pollution in the Gorge, this includes fugitive emissions of coal dust and diesel emissions from trains. The DEIS does not consider the impacts of the locomotive-related diesel emissions or fugitive coal emissions that would be generated in the Gorge as a result of the proposed project.

The DEIS does not take into account the adverse effects to the scenic resources of the Gorge of the proposed project. The additional trains would block views in NSA and the extra rail construction to facilitate more train traffic would degrade the scenic resources of the National Scenic Area.

The DEIS does not take into account the permanent degradation of the recreation resources of the NSA that would occur. The additional train traffic would wake campers and detract from the recreational experiences at the recreation areas in the NSA. In fact, The Oregonian reported that "When camping in the Gorge, it pays to be a little deaf" and singled out excessive train noise as a cause. Cumulative adverse impacts of increased train traffic to the recreation resources of the NSA must be considered and impacts caused by past actions must be included.

The EIS does not adequately disclose impacts to the cultural and historic resources of the Gorge. Notably, Native American cultural resource sites are already suffering from adverse impacts from air pollution. Increased nitrogen emissions and impacts from a coal spill could permanently destroy irreplaceable Native American sites.

Please consider all these points, address them in the DEIS and reject this coal terminal proposal. Thank you again for the opportunity to comment.

Sincerely,

Arlene Burns

Arlene Burns
Mayor of Mosier, OR