

May 25, 2016

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

Dear EIS Evaluators,

Thank you for writing the environmental impact statement (EIS) for the Millennium Bulk Terminals in Longview, Washington. Thank you, too, for accepting my public comment.

Your EIS is alarming to say the least. You point out significant impacts to the Columbia River Basin and to Washington State, but I would suggest you don't go far enough. The impacts extend to the whole length of the transportation route from the Power River coal mines to the site of the export facility.

- I am deeply opposed to this coal export facility. I encourage your outright rejection of this proposal and call for an adjusted No Action alternative that terminates all future planning for coal export and prohibits all coal exports from the applicant's leased property.

The company in question is not trustworthy. In 2010, the Millennium Corporation misled the Longview community about the intended size of their proposed coal export terminal. Only when the news media revealed internal memos did the company pull their permits and tell the truth: they wanted to export 44 million tons, not eight, of coal every year from Longview.

This project has significant, unavoidable impacts:

- greenhouse gas emissions and accelerated global warming,
- health and safety concerns of people living along the tracks,
- coal dust accumulations adversely affecting the land, rivers, and streams, and
- vastly increased rail traffic and potential safety concerns as more coal trains clog the tracks along with volatile Bakken oil trains.

This proposal would add 16 coal trains a day, half loaded, half empty. The increased trains will affect more than Cowlitz County and more than Washington State. They will exceed current capacity in Idaho and in my home state of Montana, and, since the trains go through the middle of many towns and cities, the increase in coal dust and diesel fumes will adversely affect the health of all humans in residential neighborhoods next to the tracks.

The wide-ranging health dangers of coal dust include exposure to toxic heavy metals like mercury, cancer, and increased rates of asthma, especially in children.

Coal dust is a real and significant hazard. One recent report noted, “So much coal dust escapes from the open-top rail cars used for transporting coal that it can create safety problems for rail traffic. Coal dust deposits sometimes cause spontaneous fires, and in 2005, for example, coal dust that had accumulated in ballast, the layer of crushed rock that supports rail tracks, caused derailments.”

Powder River Basin (PRB) coal—the type that would be exported from proposed terminals in the region—is notoriously difficult to handle without enormous amounts of escaping dust. One technical analysis finds that “PRB coal is extremely friable and will break down into smaller particles virtually independent of how the coal is transported or handled.”

Even BNSF Railway has studied the problem. The railroad found that as much as a ton of coal dust can escape from a single loaded coal car. Some reports estimate that three percent of a coal car’s load, which is typically 100 tons or more, can blow away in transit.

The US Department of Transportation classifies coal dust as a “pernicious ballast foulant” that can weaken and destabilize rail tracks.

Dan Jaffe, a professor of atmospheric science at the University of Washington, installed air-monitoring equipment on private property near rail lines in Bellingham, Seattle, and in the Columbia River Gorge in 2013 and 2014. He then analyzed the emissions from hundreds of trains and concluded that passing coal trains do in fact spread notable quantities of dust. He calls a small number of coal trains qualify “super-dusters” because they send prolific volumes of coal dust into the air.

Your EIS mentions unavoidable and significant delays at rail crossings near the facility but should also take into account multiple delays route-wide, from eastern Montana to western Washington.

Please note that in Montana the railroads parallel our rivers. Our rivers are still wild and healthy, and they support a recreational economy second to none. Moving 44 million tons of coal a year threatens these rivers and the economy that depends on them.

China cut its coal imports by a third in 2015, and the economics of this proposal are riddled with questions. Coal prices have plummeted 62 percent in the last five years, and U.S. coal production has dropped by more than half since 2008. Some 50 coal companies have declared bankruptcy since 2012.

Specifically, Arch Coal filed for bankruptcy in January. Peabody, the largest coal miner in the country, did the same in April. Australian-based Ambre Energy, a former backer of the Millennium project in Longview, got out of North American coal in 2014, because it, too, became insolvent. Cloud Peak Energy, a minority partner in the Millennium proposal, is paying millions of dollars *not* to ship coal through a British Columbia port, since any coal exported would have to be sold at a loss in foreign markets.

Finally, I am very concerned about the global warming impacts of this proposal. According to the Draft EIS, the terminal would export up to 44 million tons of coal a year, and the associated combustion would increase global carbon emissions by 37.6 metric tons annually, the equivalent of adding seven new coal power plants.

Exporting North American coal to be incinerated in Asia means more environmental problems here at home. In the Northwest we are experiencing shorter winters, less snow, less water in our streams and rivers, more and more extreme forest fires. One only needs to look to our neighbors to the north in Fort McMurray, Alberta, to see the kind of catastrophic future fires in store for us if we greenlight projects like the Millennium Bulk Terminals, pretending they are benign.

Our ways of life are changing, and, if we don't radically reduce our reliance on carbon-intensive fossil fuels, things will only get worse. In fact, we are beginning to trigger the tipping points that are altering our arctic ecosystem. We are beginning to threaten the very survival of people on this lovely planet.

It's wrong to cause catastrophic climate change. It's wrong for companies like the Millennium Bulk Terminals to profit from the resulting environmental and social wreckage.

Please reject the Millennium Bulk Terminals proposal.

Jeff Smith
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