



June 10, 2016

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

Re: Comment on Millennium Bulk Terminals DEIS

Friends of 2 Rivers, Inc. is an organization of residents living near Milltown, Montana. Our mission is to promote a safe, healthy and enriching environment for the communities at the confluence of the Clark Fork and Blackfoot Rivers. Thank you for this opportunity to provide our comment regarding the proposed coal export terminals near Longview, Washington.

The Proposed Action would create important adverse impacts in Missoula County. Eight loaded and 8 empty coal trains would pass through the County daily. Forty four million metric tons of coal would be exported annually to markets in Asia where it would be burned in coal-fired power plants.

Climate change.

- “The international scientific community is in agreement that human activities have contributed – and continue to contribute – to climate change. One of the primary causes of climate change is the emission of greenhouse gasses...” (DEIS 5.8-2)
- Greenhouse gas emissions – The Proposed Action would annually generate 3,192,548 metric tons of CO₂ when the coal is burned in Asia (DEIS Sect 5.8)
- Induced impact – The export of this large amount of coal would lower coal price on the international market and stimulate additional coal consumption and additional adverse climate impact (DEIS Sect 5.8)
- Climate change impacts expected in Washington State will be mirrored in other Pacific Northwest states. An example is the “snow water equivalent,” which is forecast to “decline (in Washington State) by almost half (46%) by the 2040s and virtually disappear by the 2080s, greatly reducing streamflow in some areas.” (DEIS Sect 5.8.2.4). Climate change impacts resulting from the increase in greenhouse gasses persist for a long period of time, are considered permanent, and are global in nature.
- The emissions attributed to the Proposed Action would be adverse and significant (DEIS Page 5.8-16)

Rail traffic impacts upon neighboring states were not evaluated in the DEIS

Although the DEIS is thorough and well documented for Washington State, impacts outside the State are not considered. While this omission is inherent in an action that is a fulfillment of Washington State law, it is a serious shortcoming in the DEIS process because it ignores impacts upon neighboring states. Impacts of one’s actions upon neighbors are essential considerations.

The frequency of Rail accidents in Washington State are estimated in the DEIS using historic data. The observed frequency of accidents on BNSF track in the State is 2 accidents per million miles of train travel (DEIS Page 5.2-4). In Montana, approximately 200 miles of MRL track is adjacent to the Clark Fork River. Eight loaded coal trains/day would travel 1600 miles/day along the River. In a year, train travel adjacent to the Clark Fork would add up to 584,000 miles and be accompanied by the likelihood of 1 accident each year. **Impacts of a coal spill** upon the Columbia River were evaluated in the DEIS and expected to have minor consequence upon the River and aquatic life. The Clark Fork has aquatic geological and biological characteristics very different from those of the Columbia. The adverse consequences of a coal spill into this river are unknown, and could be seriously adverse. "...whether the alterations (from coal released into the aquatic environment) are significant enough to be potentially toxic to aquatic organisms depends on many factors, including the type of coal, the relative amount of time the coal is exposed to water, dilution, and buffering." (DEIS Page 4.7-33)

Delays of emergency vehicles at rail crossings outside Washington State were not evaluated. In our community there are four MRL/BNSF rail crossings, two of which have no alternate road to residential areas. Using the 6,844 foot length of a coal unit train traveling at 50mph for calculation, the 16 trains/day (8 loaded, 8 empty) will add a half hour's delay every day to each crossing. Train speeds at some of these crossings will be slower, adding time to the delay. Local emergency services have had no opportunity to evaluate potential consequences of this added delay, which would be longer if train speeds are slower.

Health impacts of coal dust were evaluated for Washington State only (DEIS Section 5.7). Of special concern were particles 10 microns and smaller, referred to as PM10 sized particles, and those 2.5 microns and smaller, PM2.5 sized particles. PM10 and PM2.5 particles are small enough to penetrate deep into the lungs and may even enter the bloodstream (EPA, <https://www3.epa.gov/pm/health.html>). Air monitoring equipment operated by Washington State along BNSF main lines detected no exceedances of federal standards.

However, an important shortcoming of the DEIS is the failure to address the long-term health risk over the lifetime of the proposed action (expected to be a minimum 30 year period, DEIS Page 2-11). Clearly, there would be long-term health consequences to residents in the vicinity of rail lines from the liberation of PM10 and PM2.5 particles from 2,920 loaded coal trains traveling each year for 30 years. Evidence that significant particulates are emitted from coal trains is bolstered by the existing need to re-apply surfactant topper agents one additional time during transport from the Powder River origin to the Longview, Washington destination. The extremely small size of PM10 and PM2.5 particles (the human red blood corpuscle is 7 microns in diameter) makes them invisible, broadly dispersible into the human environment, and present as an undefinable and adverse long term impact upon human health.

Friends of Two Rivers strongly recommends the "No Action Alternative" (The Proposed Action to export coal from the Longview Terminals would not take place) because of:

1. The intolerable impact upon climate of increased greenhouse gas emissions resulting from the Proposed Action.
2. The failure of the DEIS to address significant impacts of the Proposed Action upon neighboring states.

Thank you for this opportunity to comment.

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