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*May 23, 2016*

Diane Butorac, Washington State Department of Ecology  
Elaine Placido, Cowlitz County Building and Planning  
Millennium Bulk Terminals EIS  
c/o ICF International  
710 Second Ave, Suite 550  
Seattle, WA 98104

**Subject: Comment on the Longview Coal Port DEIS**

Dear Ms. Butorac and Ms. Placido,

The City of Whitefish appreciates the opportunity to comment on the Millenium Bulk Terminal (MBTL) proposal for Asian coal exports through Longview, Washington.

In September of 2014, the Whitefish City Council unanimously passed a resolution (Resolution Number 14-39) expressing concerns about potential increases in coal train traffic induced by proposed new mine and rail infrastructure and bound for proposed new coal export terminals in the Northwest, including the proposed port at Longview. Our concerns at that time are still true today.

With its 48.5-million-ton export capacity, MBTL would lead to an additional 16 coal trains per day passing through Montana on their way to the port, according to the DEIS. There are two rail routes through our state that converge in Sandpoint. However, the DEIS inexplicably assumes that all of these additional coal trains will be routed through the southern Montana Rail Link route, even though the MRL route has limited capacity for expansion and despite BNSF's significant investments in its Northern Tier through Whitefish in recent years. The DEIS provides no explanation for this assumption. Although most export-bound coal trains in Montana currently do utilize the southern route, some coal trains are routed through Whitefish regularly. Therefore, we believe it is reasonable to conclude that approval of MBTL, resulting in an additional 16 coal trains per day passing through western Montana, will lead to increased coal train traffic through Whitefish.

Please expand your analysis to consider the potential impacts of additional coal trains passing through Whitefish.

We maintain the following concerns about increased coal traffic through Whitefish:

- Delays and adverse rescheduling of Amtrak's Empire Builder route. Whitefish is a major destination for Amtrak's passengers. Residents and visitors utilize Amtrak for pleasure and business, and Amtrak service is an important part of our economy. Service has deteriorated in recent years due to increased freight and oil traffic. Additional coal trains will likely exacerbate the problem;
- Increased delays at three at-grade crossings (Birch Point, Second Street and State Park Road). Increased delays can inconvenience residents and park visitors, especially at two of the crossings where residents have no other ingress and egress to city neighborhoods. Increased traffic could block access for emergency service vehicles to those neighborhoods as well, creating health and safety risks;
- The addition of loaded coal trains to the existing mix of freight traffic increases the risk that a derailment could dump loaded railcars of coal or crude oil (in the case of mixed trains) in or around Whitefish. A spill of coal or oil into Whitefish Lake would have far-reaching impacts to the community. Up to thirty percent of Whitefish's municipal water supply comes from Whitefish Lake, and the lake itself is a primary driver behind our tourist economy. These impacts would adversely affect the health and quality of life of Whitefish residents; and
- Additional public health and safety issues from diesel emissions and fugitive coal dust. It should be noted that the Whitefish Middle School is less than 100 yards from the BNSF tracks.

Many of these impacts to Whitefish cannot be mitigated. But even in the case in which these challenges have potential solutions, we would note that the Whitefish community lacks the funding to mitigate those impacts through the creation of quiet zones and construction of underpasses or overpasses.

Because the proposed Millenium Bulk Terminal would create adverse new impacts to the City of Whitefish, we encourage you to select the 'No Action Alternative'. Thank you for the opportunity to comment.

Sincerely,



Richard Hildner  
Deputy Mayor  
City of Whitefish



**CITY OF WHITEFISH**  
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