



9 June 2016

TO: U.S. Army Corps, Washington Dept of Ecology, Cowlitz County

VIA: <https://public.commentworks.com/cwx/mbtldeiscommentform>

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Subject: Millennium Bulk Terminals Longview Coal Export DEIS — comments

Dear US Army Corps of Engineers, WA Dept. of Ecology and Cowlitz County:

Please accept the following comments from Oregon Wild concerning the Millennium Bulk Terminals Longview Coal Export DEIS, <http://www.millenniumbulkeiswa.gov/>, <https://public.commentworks.com/cwx/mbtldeiscommentform/>. Oregon Wild represents over 15,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy.

Mining, export, and use of coal is simply not in the public interest. Oregon Wild therefore urges you to adopt the "no action" alternative in the Millennium Bulk Terminals FEIS & Record of Decision.

Millennium's proposed coal export terminal would harm communities throughout the Northwest, including sites where coal is mined, transported, and with the most intense impacts felt in Longview, Washington, near the proposed export terminal site. The project harms public health and safety, air and water quality, natural resources, and of course the climate upon which humans and all other ecosystems depend. Oregon Wild urges your agencies to protect public health and natural resources by rejecting coal export.

Climate Change: Coal is the single biggest source of climate changing CO₂ pollution on earth. Fossil fuels are the biggest problem, and coal is the worst offender among fossil fuels. We urge decision-maker not recognize that CO₂ has a very long residence time in the atmosphere. The severe climate impacts of your decisions today will affect many generations to come.¹ Thinking people agree that solving the climate crisis requires that we leave fossil fuels, and especially coal, in the ground, so it cannot contribute to the climate crisis. See Lashof et al 2007. Coal in a

¹ "Using a combination of various methods, researchers have estimated that about 50 percent of the net anthropogenic pulse would be absorbed in the first 50 years, and about 70 percent in the first 100 years. Absorption by sinks slows dramatically after that, with an additional 10 percent or so being removed after 300 years and the remaining 20 percent lasting tens if not hundreds of thousands of years before being removed."

<http://www.yaleclimateconnections.org/2010/12/common-climate-misconceptions-atmospheric-carbon-dioxide/>

Changing Climate. NRDC. <https://www.nrdc.org/sites/default/files/coalclimate.pdf> Northwest states are national leaders in the fight to combat climate change. Considering rail and vessel emissions alone, this project would be one of the biggest greenhouse gas emitters in Washington state. Coal export undermines the state's hard work to combat climate change and protect future generations. Exporting coal will just perpetuate and increase dependence on the worst possible source of energy. Climate change is a global problem that requires rapid global reduction of greenhouse gas emissions. Exporting coal is simply inconsistent with this urgent need. Oregon Wild urges our leaders to work for a swift global transition to renewable, non-fossil energy supplies.

Health & the Environment: The Draft EIS reveals many serious impacts to human health and the environment. It dismisses other impacts without a valid basis. The Final EIS should incorporate the best available science, real world examples, and a comprehensive Health Impact Assessment. The agencies undercut public, tribal, and agency input by failing to complete a Health Impact Assessment before releasing the Draft EIS.

- Coal is directly responsible for a wide range of serious health impacts including lung ailments, heavy metal exposure, and low birth weight. These impacts have been born by individuals and communities through increased suffering, disease, and health care costs. If health and environmental damages were included in the price of coal, it would triple the cost of electricity for U.S. consumers. Yet the full impact of coal is not felt on wallets, it is born by the health of individuals and communities. https://noharm-uscanada.org/sites/default/files/documents-files/3169/Coal%20Divestment%20White%20Paper_0.pdf
- Coal mining destroys ecosystems, releases toxic levels of minerals and gasses into our water and air (including the potent greenhouse gas methane) and exposes miners and those who live nearby to coal dust and other toxins. Thousands of people die in mine collapses around the world every year.
- Beside CO₂, coal combustion releases millions of tons of sulphur dioxide and nitrogen oxides into the air, which create acid rain and smog.
- Coal burning also yields particulate matter pollution, which creates air pollution and respiratory ailments, among other health problems.
- Another by-product of burning coal is mercury, which infiltrates the food chain and attacks the human nervous system. Young children and babies, whose nervous systems are still developing, are especially vulnerable.
- Burning coal creates millions of tonnes of waste products that contain toxic levels of heavy metals and minerals. These mostly end up in landfill sites or impoundments, and pose a threat to our health and environment.

Greenpeace 2010. The Case Against Coal.

<http://www.greenpeace.org/international/en/campaigns/climate-change/coal/The-case-against-coal/>

Rail Traffic: The Draft EIS demonstrates Millennium would have a severe impact on rail and road congestion. Because Millennium cannot fix this significant harm—from mine to terminal—

the agencies should deny permits. “Transporting coal from where it is mined to where it will be burned also produces significant quantities of air pollution and other environmental harms. . . . Almost 60 percent of coal in the United States is transported at least in part by train, with coal transportation accounting for 44 percent of rail freight ton-miles. 66 Coal trains some of which reach more than two miles in length, cause railroad-crossing collisions and pedestrian accidents (there are approximately 3,000 such collisions and 900 pedestrian accidents every year) and interruption in traffic flow (including disruption to emergency responders such as police, ambulance services, and fire departments).” Lashof et al 2007. Coal in a Changing Climate. NRDC. <https://www.nrdc.org/sites/default/files/coalclimate.pdf>.

Inadequate & Unenforceable Mitigation: In some instances, the Draft EIS claims mitigation can reduce coal dust, rail traffic, and other impacts of this coal export project. For example, to mitigate coal dust from the terminal, the Draft EIS proposes a reporting process for coal dust complaints. This is grossly inadequate. A phone call or email to complain about coal dust fouling a person’s lungs, home, and river is not “mitigation.” The agencies should revise the Draft EIS and remove inadequate, unsupported, and unenforceable mitigation.

Sincerely,

A handwritten signature in black ink that reads "Doug Heiken". The signature is written in a cursive, flowing style.

Doug Heiken
dh@oregonwild.org