

Comments on the Longview Millennium Bulk Terminal DEIS

The crux of most of this is that the applicants have followed the too often used path of pushing the cost of their doing business onto uninvolved third parties who should not have to bear any such burdens.

Scope of the EIS

The EIS did not look at impacts that will result solely from approval of this project but beyond Washington State's borders. This is a serious flaw.

Groundwater and Surface Disruption

The EIS looked only at the effects on the immediate terminal area. Project approval will directly result in surface mining of massive acreages in the arid west. The surface disruption and pollution or destruction of ground water resources which are crucial to ranchers, farmers and other residents of the West, will be substantial.

Because the reclamation rate is so low for the current mines, these effects can be presumed to be to a very large extent permanent.

Reclamation efforts can be expected to continue to decline as global coal prices continue to decline. Arch Coal has already declared bankruptcy. (That their corporate officers then claimed bonuses while trashing employee pension funds bodes very poorly for any responsibility they may owe to society as a whole.) Much or most of the disturbed/damaged area and water resources will likely only be reclaimed at future public expense. As demands for lower taxes continue, the likelihood of adequate reclamation becomes very low.

Coal dust

The DEIS cited rail roadbed degradation as a result of coal dust deposition.

Air modeling and deposition discussions assumed management practices of load shaping and top-coating. I found no mention of whether these practices are enforceable. In light of the recent derailment, oil spill, fire, and contamination of the Columbia river, this could be a very serious oversight.

Minority and Low Income Populations

In Billings low income housing, which includes most of our minority population, is located from less than a tenth of a mile, to a mile and a half from the tracks. The addition of 16 trains per day at all hours will certainly result in sleep disruption, and associated health impacts.

All emergency medical services are located north of the tracks. The low income population is mostly housed south of the tracks. There are four access routes above or below grade. The rest, including the

most direct access from the South Side, are at grade. Even after a train has passed there is considerable delay in clearing the gridlock through the intersections North of the tracks. In an emergency situation the delay in either waiting or rerouting could have serious consequences. With 16 trains per day that effect, as well as the lost productivity to businesses using those routes could result in significant losses.

But there is extremely little likelihood that BNSF or any of the coal companies will contribute anything to the tremendous capital cost needed to reconnect Billings or any of the other rail communities that would be seriously affected by this project.

Climate Change

Much of the resistance to taking action on climate change points to China's coal consumption. Why should we make any sacrifices if they don't? That argument makes no sense at all when we are the ones selling them the coal.

Among the scientific community there is certainty. The effects we are seeing today are entirely consistent with what atmospheric scientists predicted decades ago, including what Exxon's own scientists predicted in the 80's. A few of these effects are as follows.

- In many places around the world climate change is already catastrophic. In Africa, Mt. Kilimanjaro used to have a large ice cap, which provided year round runoff to the surrounding lowlands. Cattle had been there so long they became not just part of the culture, but part of the religion. Now the ice cap is all but gone, along with the runoff. The cattle are all dead or gone. And the people have to be suffering too.
- In the Andes, the same circumstances are occurring. They are expected to result in the displacement of over a million people.
- In Alaska, coastal villages have washed away because of the disappearance of sea ice that protected them.
- California has had its worst drought ever. Southern California still has had little respite. The Pacific Northwest drought is expected to persist this year. Flooding and droughts are increasing world wide.
- Bark beetles have killed millions of acres of forests across the West because winters are not cold enough, and summers are too dry.
- Weather is getting more violent and destructive. Aside from mile-wide tornadoes, the warm ocean temperatures have spawned three superstorms in the last few years. Last year the highest winds in a hurricane ever in the Pacific were recorded.
- Globally, the oceans have become more acidic because of the added CO₂ emissions, as well as much warmer, resulting in damage to reefs, and a global decline in the oceans' productivity – a very bad trend.
- The ranges of wildlife species have shifted north. Some decline because they have nowhere to go.
- And the earth's surface temperatures continue to rise. 2014 and 2015 were successively the hottest years ever recorded. All of the years since 2000 have been in the top 20.

The substantial and unnecessary emissions directly caused by this project would be permanent.