

## Millennium Bulk Terminals-Longview SEPA Environmental Impact Statement Comment Letter from Health Professionals

As health professionals we welcome the opportunity to comment on the the Millennium Terminal EIS. The draft report underestimates both the magnitude of harmful emissions and their impact on human health. We disagree with the report's findings of no significant impact on climate and air quality.

### CHOICE OF SCENARIO

By designating the 2015 scenario as “preferred” the EIS minimizes the amount of coal that could be burnt. This upstream error leads to downstream underestimations of climate and air quality impacts. The scenario assumes that the Clean Power Plan is in effect and that the US will keep its Paris commitments. In reality Clean Power Plan is suspended by the courts and its fate, along with other EPA actions, and US adherence to the Paris climate accord will depend on the result of a presidential election between climate denying and climate proactive candidates who are currently neck and neck in public opinion polls. (Cho, 2016)

The Upper Bound scenario, which has no Clean Power Plan or American leadership on climate change, is described by its authors as also “plausible”, is just as likely as the 2015 scenario, and creates twelve time more greenhouse gas emissions. Since things could go either way, the stakes are high, and the consequences irreversible, the Upper Bound scenario is the safer choice on which to base estimations of possible impact.

### CLIMATE IMPACT

It is hard to understand how greenhouse gas emissions from the project can be deemed significant and unavoidable while the climate change they cause is not. The EIS fails to adequately consider the effect of climate change on air and water quality and environmental justice. Higher temperatures increase ozone formation, drought and dust storms increase PM10, and wildfires generate concentrations of ozone and PM2.5 which are higher than the worst urban air day. Climate change also increases toxic algae blooms, storm runoff of PCBs and heavy metals, and sewage overflows (USGCRP, 2016) (Jackson, 2010). All of these impacts disproportionately impact minority and low income people. We suggest that impacts on climate, air and water quality be revised to reflect current political uncertainty and indirect impacts.

### COAL DUST

To assess the environmental impact of coal dust, this EIS relies heavily on a draft EIS of the Tongue River Railroad which was never finalized due to withdrawal of the permit request. Much of the chapter on coal dust in the Millennium report is lifted verbatim from the Tongue River draft without attribution. Fugitive coal dust increases with wind and is inversely related to days of rainfall so there is reason to suspect that conclusions about one location may not apply to another. A partially completed environmental review of another project in another state by another agency is an inadequate basis to determine the safety of transporting coal by train through Washington.

What we do know about coal dust in the Washington context is that a published peer reviewed study of coal trains in the proposed rail corridor showed short term increases in PM2.5 at levels known to cause adverse health effects (Jaffe, 2015). Short term spikes in PM2.5 from coal trains have been described elsewhere in the literature (Kane, 2015). Since BNSF policy has required coal loads to be topped since

2011, Jaffe's measurements in 2014 suggest that topping is either ineffective or the railroad is incapable of ensuring compliance. We recommend that WDOE independently review fugitive coal dust studies and the literature on the health impact of short term PM2.5 exposure, consider them in the context of areas prone to drought and high winds, and formulate their own conclusions.

Thank you for the opportunity to comment on this EIS.