

June 12, 2016

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

Re: EIS Public Comment for Millennium Bulk Terminals – Longview coal export terminal

Washington State Department of Ecology:

As environmental scientists, we are providing our comments on the proposed Millennium Bulk Terminals – Longview coal export terminal. Lighthouse Resources Inc. is requesting to transport coal it (carbon-emitting and potentially combustible) through the Columbia River basin and to store it in Longview before shipment to East Asia.

Spills, Explosions, and Aquatic Ecosystem Impacts

The impact of a spill or explosion can have severe economic ramifications. If a vessel or train spill into the Columbia River, the environmental impacts would be extremely difficult to contain, given the strong water currents. Countless numbers and diversity of fish and wildlife live in this area and out into the Columbia River saltwater plume and Pacific Ocean. Salmon, seals, and whales are among the most revered. Visitors from all over the world come to fish for Pacific salmon and view the Pacific Flyway bird migrations in our National Wildlife Refuges (which provide resting and feeding areas). The effects of coal/dust release from train derailment or vessel spill would be widespread and long-lasting in aquatic, land, and aerial environments.

Hence, studies need to address the impacts to plant and animal species (e.g., birds, mammals, fishes, insects, lizards, amphibians, plants, and fungi). All threatened and endangered species in marine and freshwaters, on land, and in the air need to be thoroughly evaluated.

Other Environmental Resource Concerns

The Columbia River is the largest salmon river in the Pacific Northwest. Seasonality, indirect (e.g., food-web), and cumulative impacts should be included in the assessment, including wetland impacts.

Longview is located in tidal waters of the lower Columbia. Out-migrating juvenile salmonids use tidal-freshwater and estuarine habitats for feeding, rearing, and acclimation to saltwater. Returning adult salmon also use these habitats to acclimate to freshwater. Essential habitats for Pacific salmonids, sturgeons, lampreys, eulachon smelt, Pacific herring, and other marine fishes may be negatively impacted, so their food sources and spawning habitats should be evaluated for the Longview terminal project and connecting rail lines throughout the Columbia River basin (including Spokane).

Avian breeding, feeding, and roosting sites need to be assessed for potential impacts from noise, vibrations, and light during construction and operations. If pilings are installed, noise/vibration impacts to whales and other marine biota should be evaluated. Adverse effects on reproduction and migrations of birds and marine mammals are likely to occur and need to be studied.

Finally, the public needs to understand what types of environmental mitigation are being considered for each potential impact (direct, indirect, and cumulative).

Hydrology, Hydrography, Geology, and Contaminants

The Columbia River estuary includes mudflats and saltmarshes that are difficult to clean up in the event of a derailment or vessel spill. The unique hydrology and geology of the area combines in such a way that coal contaminants can spread rapidly and widely, especially during winter storms with strong winds, heavy rain, and spring tides. Full-seasonal hydrographic studies of marine currents along vessel routes need to be performed to determine potential suspended and benthic sediment contaminants, both within Columbia River and for the outer coast.

Freshwater resources, including sole-source aquifers, well-head protection zones, and groundwater tables, need to be assessed. Stormwater runoff and its potential impacts to groundwater and surface water conveyances should be evaluated, including saltwater impacts. Storage, plant operations, and maintenance and use of all hazardous substances to be used, generated, or processed from the site should be assessed.

The potential impacts from local geology should be included in the Environmental Impact Statement (EIS), including an assessment of geologic faults and tsunamis. Soil types should be studied to address potential impacts such as liquefaction.

Climate Change and Air Quality

Climate change impacts should be assessed for all potential rail and vessel transport areas in terrestrial and aquatic (freshwater/marine) environments. The study should also address greenhouse-gas impacts related to the burning of coal, both local and abroad. Other potential impacts such as increasing sea level and wetland inundation should also be fully evaluated.

Wind currents may bring contaminants from this burned coal back to western Washington. Volume, concentration, and types of compounds need to be assessed for effects to human health and biota.

Public Safety

Storage, processing, and potential derailment and vessel-spill impacts need to be evaluated, particularly given the aging railways in Washington state. We have already witnessed catastrophic impacts from the derailment of coal from the Bakken deposits, including infrastructural destruction, loss of life, and negative economic impacts. The rail line carrying the coal is close to Columbia River urban areas and busy highways. Because coal is combustible, derailment could cause an explosion that could kill and injure many people; no loss of life is acceptable. This could also cause major disruptions to commerce and recreational uses. Furthermore, “rapid response” really needs to be available immediately to minimize injury and loss of life.

Coal dust can cause significant air pollution that spreads toxins widely and can affect our ability to breathe. Because increased coal dust will impact air quality, wind-current directionality and airborne contaminants need to be evaluated.

Social/Environmental Justice Assessment

The evaluation should assess minorities (e.g., tribal and eastern Washington Hispanic) and economically depressed communities in the Cowlitz and adjoining counties because they have few resources to deal with human/environmental calamities that could impact them. A noise/vibration study also needs to be conducted to determine the impacts to human residents, especially the poor.

Land Use and Traffic

Population growth and density need to be studied to assess whether increases align with the future needs to support infrastructure. Evaluations need to be performed to assess at-grade intersection rail crossings for traffic congestion and safety, and for emergency-vehicle access.

Concluding Remarks

The scope of this EIS should be comprehensive. Without further studies of real and potential impacts for each of the aforementioned disciplines, it is irresponsible for coal profits to be the priority for growth in Cowlitz County. And the fact that this county is economically depressed should not be driving the potential for public and environmental risk. Coal companies cannot readily provide adequate bonds to cover potential damages from derailments, vessel spills, and air pollution. Railroad and vessel companies have poor track records of providing adequate compensation for public and environmental damage. The overwhelming burden of recovery falls disproportionately on the public and government agencies.

Concerns

- Increased rail traffic will cause the tracks to deteriorate even more quickly.
- The frequency and thoroughness of inspections and maintenance of railroad tracks needs to be ramped up.
- Coal cars need to be covered, to minimize air and soil pollution.
- The safety and durability of the vessels should require double-hulled ships.
- Public safety and soil/air/water quality should not be compromised for coal-company profits.
- Millennium Bulk Terminals should be required to provide full bond coverage for potential emergencies from train/vessel crashes and natural disasters.
- Rapid-response equipment, manpower, and safety plans must be in place at all (inland/coastal) locations prior to the transport of coal.
- Most importantly, the coal industry is not economically viable and would contribute greatly to climate change overseas that would in turn impact us.

The Columbia River basin is enjoyed by many Washington citizens and visitors for their priceless and irreplaceable natural wonders. We strongly recommend that these areas be protected for today and posterity.

Washington state is rapidly moving away from fossil fuels towards clean, renewable sources to meet our energy needs and respond to global warming. Building more infrastructure for “dirty” fossil fuels does not support our state’s commitment to address climate-change impacts. We support our state’s continued efforts to be a leader in safe, renewable, clean-energy solutions.

A full EIS needs to be performed, because the risks are too high from environmental and human safety standpoints, including for generations to come. It is not a matter of IF a coal derailment/spill will occur in southwestern Washington, but WHEN. There should be no increase in the number of coal trains and vessels until questions and concerns are satisfactorily addressed.

Thank you for considering our comments.

Sincerely,

Dr. Robert L. Vadas, Jr. and Cynthia L. Stonick
Aquatic Ecologists