



Missoula City Council

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June 8, 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

Dear Ms. Butorac and Ms. Placido,

We, the undersigned Missoula City Councilors, appreciate the opportunity to comment on the proposed Millennium Bulk Terminals (MBTL) proposal for Asian coal exports through Longview, WA.

Since 2012, the Missoula City Council has passed four resolutions in recent years expressing concern about the effect of increased coal train traffic through our town. We have been joined in this concern both by the Missoula City-County Air Pollution Control Board and the Missoula County Commissioners.

With its 44 million ton export capacity, MBTL would lead to an additional 16 coal trains (8 full, 8 empty) per day through our town. In failing to conduct a detailed analysis of rail impacts in Montana, the State of Washington has ignored significant impacts to our community. Namely, an increase in coal train traffic through Missoula would:

- Increase congestion and traffic delays, in particular at the at-grade crossing at Madison and Greenough. This crossing is one of two means to entry to and exit from our Rattlesnake neighborhood, and is notably the most convenient path from fire station 1 to the adjacent neighborhoods. Increased rail traffic would constrict pedestrian, vehicular, and emergency service.
- Exacerbate air quality issues in the Missoula Valley, especially during air inversions. A large part of Missoula is located in an EPA-designated air stagnation zone and is dangerously close to exceeding current EPA PM2.5 standards. Increased diesel particulate matter and coal dust are serious concerns for people living in residential neighborhoods near the rail line, including a significant portion of our city's population.
- Increase risk of derailments. The State of Washington has found that building MBTL will lead to more derailments. Like many Montana towns that grew around the railroad, the rail line runs immediately adjacent to our downtown as well as through dense residential neighborhoods. There were two separate locomotive crashes in or near our town in 2014,

including a collision in the Missoula train yard that resulted in the derailment of 30 tank cars.

- Exacerbate climate change problems. Like many western towns, parts of Missoula are surrounded by forest. Increasing incidences of wildfires caused by climate change are therefore a threat to our community. Additionally, droughts represent a threat to our community's river economy. Shipping tens of millions of tons of additional coal through our community each year for combustion in Asia will exacerbate these risks, which Missoula cannot afford.

Many of these impacts cannot be mitigated. Even the ones that can (via, for instance, construction of a new overpass or underpass) would impose significant new costs to Missoula taxpayers.

Because the proposed Millennium Bulk Terminals would create adverse new impacts to the City of Missoula, and because the State of Washington's draft review of the MBTL proposal fails to include impacts to the City of Missoula, even though Missoula sought to be included as early as 2013, we encourage you to select the 'No Action Alternative' and deny the permit for the proposed new coal port in Longview.

Thank you for the opportunity to comment.

Sincerely,

Heidi West, Missoula City Council Ward 1

Fay von Loeb, City Council, Ward 1

[Signature] City Council, Ward 2

[Signature] City Council, Ward 3

Emily Bentley city council ward 3

[Signature] - ward 5

Marilyn Mauler Ward 6

John D. Bain WARD 4