



June 10, 2016

VIA FIRST CLASS MAIL

Elaine Placido
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Cowlitz County
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Kelso, WA 98626

Sally Toteff
Director, Southwest Regional Office
Washington State Department of Ecology
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RE: Comments on DEIS Millennium Coal Export Terminal

Dear Ms. Placido and Ms. Toteff:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the proposed Millennium Coal Export Terminal. Vancouver is uniquely situated at the intersection of major rail corridors which lead to points east and north and south. The BNSF rail lines run through the City of Vancouver East-West along the Columbia River and North-South west of the downtown. A significant amount of rail freight traffic travels through Vancouver city limits and most, if not all, of the coal trains headed to or from the Millennium facility will pass through Vancouver city limits.

As reflected in the City Council's Resolution of July 16, 2012 (attached) and reviewed by the City Council as recently as May 23, 2016, the City of Vancouver has a number of concerns with the project in regard to potentially significant adverse impacts.

Delays to Transportation and Emergency Response

There are 27 at-grade rail crossings within Vancouver along the route to the facility. Thirteen of the 27 at-grade crossings provide the only access for ingress or egress for the area they serve. These crossings are the only access to homes for thousands of residents. On December 14, 2015, a BNSF freight train collided with a vehicle near a public at-grade crossing. The freight train blocked the only access for police, fire and emergency responders and the only roads for egress to 450 residents living south of the railroad tracks for three hours.

The DEIS indicates that the cumulative impacts of the proposed action and other reasonably foreseeable projects would, by 2038, exceed the capacities of the BNSF mainline from Pasco to Vancouver and from Vancouver to Longview. The Pasco to Vancouver capacity is 41 trains per day and the projected volume is 94 trains per day. The Vancouver to Longview capacity is 80 trains per day and the projected volume is 142 trains per day. This is a significant unavoidable impact unless mainline improvements are made which is beyond the authority of your departments to require. The project will also result in a 22% increase in train accidents unless safety improvements are made which is, again, beyond your authority to require.

The DEIS includes a qualitative assessment of the potential cumulative impact of 2038 rail traffic on BNSF main line routes to vehicle delay, emergency service response, and vehicle safety. This study shows the cumulative proposed action impacts causing multiple crossings to go into failure in Cowlitz County. The DEIS included an analysis of crossings in Washington outside of Cowlitz County. However, no the analysis did not include Clark County which is the most populous county on the route in Washington. This omission must be corrected.

Given the projected length of the trains (up to a mile and-a-half per train) and 8 such trains per day that will be moving through Vancouver, there will be substantial delays at at-grade vehicle crossings. Such delays will result in increased residential and commercial traffic congestion, lost productivity; increased tailpipe emissions from idling vehicles, etc. The direct and cumulative impacts from blocked crossings need to be studied in the FEIS, and mitigated to a level of non-significance. The DEIS should address the impacts of increased train volume and train accidents to transportation and emergency response in Vancouver and Clark County.

Coal Dust

Substantial uncertainty exists, including contradictory evidence, about the potential environmental effects from coal dust that may blow off or otherwise escape the coal cars. The DEIS acknowledge that there is not a state or federal standard for coal dust deposition. Instead, the DEIS uses a "nuisance" standard from a New Zealand study. We believe that using this standard minimizes the impacts of the disposition of coal dust to our citizens living along the rail line. The FEIS should study and conclusively determine what direct and cumulative impacts may occur to human health as well as natural systems such as wetlands, soil, vegetation and streams. Serious consideration should be given to requiring that all coal cars which access the Millennium Terminal be covered during transport in order to mitigate such impacts to a level of non-significance.

Greenhouse Gas Emissions

The rail and vessel emissions transporting 44 million tons of coal a year makes this project one of the biggest greenhouse gas emitters in the state of Washington. The DEIS shows that exporting significant volumes of coal will influence coal consumption decisions, leading to estimates as high as 27 million tons/year of net additional emissions. That's equivalent to over 7 new coal fired power plants. It would increase the state's existing total GHG emissions by around 30%. This is totally unacceptable. Approving this project would be contrary to clean energy and fossil fuel transition policies recently passed in Washington.

Again, thank you for the opportunity to provide comments on the DEIS Millennium facility.

Sincerely,



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cc: Mayor and Council
Eric Holmes, City Manager (via email)
Joe Molina, Fire Chief
E. Bronson Potter, City Attorney

For more information, or to request alternate formats of this letter, please contact the City of Vancouver Law Department at (360) 487-8500 (TTY: 360-487-8602) or by email at vanlaw@cityofvancouver.us.