

Thank you for allowing the public to comment on the Millennium Bulk Terminal proposal that is being considered by the state of Washington. As you know, this \$680 million terminal would ship 44 million tons of Montana and Wyoming coal to Asia annually from Longview, Washington. I live in Montana and I have been well aware of the efforts of Arch Coal and others to mine coal here and ship it overseas to China and other ports along the Pacific Rim. I am not sure exactly where the source of this coal is designed to come from as Arch Coal has basically given up on their Otter Creek Coal Mine in southcentral Montana. And they have done so for many reasons. One is, best to my knowledge, the company declared bankruptcy. There is an inescapable fact that coal mining is in a state of decline across this country and it is in a state of decline because the costs to mine coal are increasing and because there are other sources to produce electricity which are more efficient than burning coal.

Even in China this is true where the overall economic picture is changing for they too want to reduce their reliance on coal. The data used to support the proposed export facility are outdated. China cut its coal imports by a third in 2015.¹ Coal prices have plummeted 62 percent in the last five years, and U.S. coal production has dropped by more than half since 2008.^{2,3} Some 50 coal companies have declared bankruptcy since 2012.⁴ There are many sources for this information. See below for references.

This is especially true when you consider the costs of environmental degradation. And along that front, exporting North American coal to be incinerated in Asia means more global warming here at home. That is a fact. The Northwest is already experiencing shorter winters, less snow, less water in our streams and rivers, more and more extreme forest fires. The same is true here in Montana. According to the Draft EIS by Cowlitz County and the Washington Department of Ecology, the terminal would increase global carbon emissions by 37.6 metric tons annually, the equivalent of adding seven new coal power plants a year. This is unacceptable. The ramifications of building the terminal have far greater impacts than just from the construction phase itself. You have to look at the operation and the purpose of the facility over longer periods of time. It is simply immoral to have a company like the Millennium Bulk Terminals to profit from such environmental degradation. All companies should have a social contract, an obligation if you will that they have a responsibility to the health of the world in which we all live.

And another environmental concern is that of air pollution and pressure on already weakened infrastructure across this country due to neglect and bickering over who is going to fund such restructuring. Adding 16 coal trains a day, half loaded, half empty to and from the Powder River Basin will simply add to that pressure. I understand that the increased trains will exceed current capacity in Idaho and Montana. Since trains go through the middle of our towns and cities, the increase in coal dust and diesel fumes will adversely affect the health of all humans in residential neighborhoods next to the tracks. You may say this is not a concern of the terminal facility or the state of Washington, but it is an indirect result of its existence if it were to be in existence. You will facilitate the infrastructure damage across interstate boundaries. This should be a direct concern to you. I have also learned that a BNSF Railway study found that as much as a ton of coal dust can escape from a single loaded coal car. I have it from the same source, *"that other reports estimate that three percent of a coal car's load, which is typically 100 tons or more, can blow away in transit. The US Department of Transportation, meanwhile, classifies coal dust as a "pernicious ballast foulant" that can weaken and destabilize rail tracks."*⁵

Even the draft EIS mentions unavoidable and significant delays at rail crossings near the facility. But what about us who live east of there, those people in eastern Washington, Idaho, and Montana? Don't you think the impact will have the same negativity on our resources and infrastructure as well? And then there are our rivers and streams. Railroads parallel rivers in a great percentage of the time. Here in Montana, our rivers are for the most part still wild and healthy, and they support a vast recreational economy. Moving 44 million tons of coal a year threatens those rivers with the vast amounts of coal dust containing mercury, other heavy metals and other cancer toxins. We cannot afford to take a chance on this environmental degradation.

I urge a no build on the Millennium Bulk Terminal as being considered by the state of Washington. There were 6 proposals to build these terminals along the west coast. I know because I have commented against most of them as I am doing now. They were all defeated and this one should be as well for the sake of your environment and for the sake of ours and the worlds.

Thank you for this opportunity to comment. Please take my written comments above as my own and consider them as my own. Thank you once again.

Clint Nagel

¹ <https://www.theguardian.com/environment/2016/jan/19/chinas-coal-burning-in-significant-decline-figures-show>

² <http://www.wsj.com/articles/peabody-energy-says-it-may-have-to-seek-bankruptcy-protection-1458129308>

³ <http://insideenergy.org/2016/05/03/listen-to-u-s-coal-production-fall-off-a-cliff/>

⁴ <http://thinkprogress.org/climate/2016/04/13/3768908/worlds-largest-coal-company-bankrupt/>

⁵ <https://us-mg6.mail.yahoo.com/neo/launch?.rand=blgoeu9fhtr8h#623802211>