June 13, 2016

Sally Toteff, Director, Southwest Regional Office
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA  98503

Elaine Placido, Building and Planning Director
Cowlitz County
207 4th Avenue North
Kelso, WA  98626

RE:  Letter of Opposition to Proposed Millennium Bulk Terminals in Longview

Dear Ms. Toteff and Ms. Placido,

The City of Stevenson, Washington opposes the proposed Millennium Bulk Terminals and approval of the draft Environmental Impact Statement. The City of Stevenson supports the “no action” alternative in the Millennium Bulk Terminals (MBTL) Draft Environmental Impact Statement (EIS). The proposed MBTL coal export terminal would cause a significant increase in the number of unit trains of coal passing through the Columbia River Gorge, which would cause harm to the Columbia River Gorge National Scenic Area and communities throughout the Northwest. The project damages our health and safety, air and water quality, and natural resources. I urge your agencies to protect public health and the environment by rejecting this coal export terminal.

The DEIS has many flaws. The DEIS fails to adequately consider the amount of coal dust discharged from coal trains and the clear violations of the federal Clean Water Act that would result from the project. The Draft EIS reveals many intolerable serious impacts to human health and the environment. It dismisses other impacts without a valid basis. Transporting the coal to the Washington border was not examined. Eliminating a large part of the trip does not provide the full disclosure required by SEPA.

The DEIS is flawed, but nonetheless concludes that there would be significant, unavoidable impacts. Based on these disclosures, Cowlitz County and the Department of Ecology (Ecology)
have the necessary basis to reject the proposal. Once the EIS is revised to include all of the omitted impacts, the project should be denied.

A copy of City of Stevenson Resolution 2012-250 expressing our concerns about the adverse impacts of increased rail traffic through the Columbia River Gorge from coal trains is attached to this letter. Please enter this letter and our resolution into the record. Thank you for this opportunity to comment.

Sincerely,

Frank Cox, Mayor
RESOLUTION NO. 2012 - 250

CITY OF STEVENSON

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF STEVENSON WASHINGTON EXPRESSING CONCERN ABOUT POTENTIAL ADVERSE IMPACTS OF INCREASED RAIL TRAFFIC FROM COAL TRAINS PASSING THROUGH THE CITY AND REQUESTING THE APPROPRIATE AUTHORITY REVIEWING THE EIS TO IDENTIFY THE IMPACTS TO THE CITY OF STEVENSON

WHEREAS, the Burlington Northern Santa Fe (BNSF) maintains and operates at-grade track running east-west through the City of Stevenson; and

WHEREAS, the proposal to expand terminals in Cowlitz County to export coal will significantly increase the number of coal trains passing through the City of Stevenson; and

WHEREAS, there is an expectation that there will be a significant increase in general freight traffic on the BNSF track; and

WHEREAS, the expanded number of trains would result in an increase in train travel noise and frequency of horn blowing; and

WHEREAS, the substantial increase in train traffic, and specifically coal train traffic, will result in closure of at-grade crossings with greater frequency and longer periods that will create traffic congestion and could negatively impact emergency service response times; and

WHEREAS the City’s emergency services will be a first responder to rail derailments and fires and does not have the equipment or sufficient supplies to manage a response without assistance; and

WHEREAS, Stevenson has a side-track capable of hosting a full-length waiting train and additional train traffic will result in more waiting trains and emissions from idling, plus more blown coal dust from stopped trains. Moreover, trains starting from stop result in longer at-grade closure times; and

WHEREAS, until BNSF upgrades engines to the new lower emission standards diesel emissions will remain an identified health risk; and

WHEREAS, the public has a concern that there may be health risks from coal dust and other particulates blown from open cars but the City has no way to evaluate these potential impacts; and

WHEREAS, the City of Stevenson relies on tourism for its economic base and increased train traffic and associated noise could negatively impact the community’s ability to attract visitors to the area;

WHEREAS, train whistles and poorly managed train traffic does impact access to and recreational use of the city waterfront which is a key component to the tourism economy and to our citizen’s general quality of life;
NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF STEVENSON AS FOLLOWS:

I

We urge the appropriate authorities to require an environmental impact statement that identifies and measures the impacts on our community from the significant increase in coal train traffic and that the City be included as a party of record.

II

We request that the impact statements include impacts to traffic from increase closure of at-grade crossings, impacts to the City of Stevenson’s ability to deliver emergency services due to the inability to cross the train tracks, and health and safety impacts related to coal dust and other particulates being blown from open cars and increases in diesel emissions.

III

We urge the appropriate authorities to hold at least one of the environmental impact statement hearings at a location in Skamania County.

IV

We urge the US Corps of Engineers to include freight traffic and the City of Stevenson as a ‘Party of Record’ in their review of the Gateway Pacific Terminal Project, Cowlitz County, Washington and the Cherry Point Terminal Project, Cowlitz County, Washington.

V

This Resolution shall take effect and be in full force upon passage and signatures hereon. Dated and signed this 17th day of May, 2012.

CITY OF STEVENSON

Frank Cox, Mayor

ATTEST:

Mary Ann Duncan-Cole
Clerk to the Council
APPROVED AS TO FORM:

[Signature]

Kenneth Woodrich, City Attorney