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June 12, 2016

Dear Directors Toteff and Placido:

As residents of Missoula, Montana, my husband, Harold, and I are very concerned about the impacts that the development of the proposed Millennium Bulk coal export terminal in Longview, Washington, will have on Montana. We find the Draft EIS deficient and inaccurate in its coverage of Missoula and the state of Montana. For example, the DEIS (in the Supporting Document section) states that currently there are 25 to 28 trains a day traveling the route through Missoula. Four years ago the Montana Rail Link told us that existing traffic through Missoula was 16.9 trains a day. Recently the Missoulian reported that current traffic is between 13 and 15 trains a day. Rail capacity through Missoula is not discussed in the DEIS. Sixteen additional trains would be more than a doubling of existing traffic.

We are very concerned about the increased risk of derailments of all trains, including toxic and combustible freight (i.e. Bakken crude, chlorine-carrying cars), due to increased usage and consequent wear on rails. More heavy trains and ballast altered by escaping coal dust create a greater potential for accidents – a problem of geometry when the rails lose their parallel alignment by as little as three inches. There have been recent derailments of coal trains in Missoula's switching yard resulting in spillage of coal. Also, a recent derailment west of Missoula resulted in three airplane fuselages plunging into the Clark Fork River. This happened within a train's length of the towering Fish Creek trestle that crosses over turbulent waters. A toxic coal spill in such waters could be difficult if not impossible to clean up. Much of the rail traffic through Montana passes alongside or over major waterways. Railroad plans for Montana are not cited in the DEIS.

The railroad passes close to or through low-income neighborhoods, and the effects (noise, emissions/dust, crossings, etc.) on people living there are much greater than for the general population – both to their health and their physical safety. This is an environmental and social justice issue that should be considered.

A highly critical performance audit concerning rail safety prepared by the Montana Legislative Audit Division to the Montana Legislature (October, 2015) mentions increased rail traffic through Montana, including dangerous Bakken oil trains and coal trains. This report is very informative and should be included in your DEIS, with particulars concerning rail accidents. Human factors and rail conditions are listed as primary causes of accidents. Deficiencies in up-to-date planning are noted. The report is available on line at <http://leg.mt.gov/audit>.

Since 1999 my husband and I have been very involved in climate change issues, publishing a science-based climate change quarterly (*The Mercury's Rising*) for three years and most recently making a film on coal and climate change (*Coal Road to China*). We showed this film across Montana, Washington and in Sandpoint, Idaho.

Building new coal export infrastructure would lock us into a future of more pollution and carbon emissions. Burning coal is the greatest contributor to greenhouse gases and climate change. If we are ever to be serious about changing the trajectory of warming, we must stop burning coal. It is inescapable: the transport of 44 million metric tons of coal annually would roughly produce double that amount of CO₂ on combustion. We would be accomplices in this – an end run around efforts by the Northwest Power and Conservation Council's latest plan to reduce greenhouse gases. The same goes for the agreement of 195 nations, signed in Paris last year. The World International Energy Outlook said that 80% of the known coal deposits must stay in the ground to stop global temperature rise at 2 degrees Centigrade.

Harold was a smokejumper as a young man (we are now in our mid-70's), and has remained active in promoting fire-wise safety measures. The fire season in Montana is now 78 days longer than when he was smoke jumping, and the fires are often more intense and dangerous. A recent film, *Unacceptable Risk*, which you can find on the internet, shows that some fires are now so dangerous that the risk is too great for firefighters to tackle them. The film attributes this increased fire danger to climate change. The increased heat and arid conditions also affect fires caused by sparks from trains.

I am a long-time member of Missoula's Air Quality Advisory Council and was an emergency medical technician in a rural area for eight years. The lack of a completed Health Impacts Assessment egregious. All along the rail line there will be health impacts. Missoula is located in a bowl surrounded by mountains, and we have serious air inversions during the winter. Missoula has come very close to exceeding Federal PM 2.5 standards, and the diesel/dust contributions of up to sixteen additional trains a day could well push us out of regulatory compliance. Doctor Paul Smith, local Pediatric Pulmonologist, has grave concerns regarding this issue and impacts on his young patients. The elderly and infirm are also vulnerable.

One of the things we love about Montana is recreating in the mountains and along the rivers and streams. Climate change, exacerbated by burning coal, is affecting

what we can do here – through wildfires, droughts, low snow pack, low stream levels and extreme weather events. Tourism is important to Montana, and our economy suffers when the state is smoky or otherwise unpleasant or unsafe for outdoor activities.

The DEIS completely ignores the impacts of new or expanded coal mining that would be induced by the proposed coal terminal. The port's proposed capacity of 44 million metric tons per year is equivalent to all of the coal annually mined in Montana. Any new mining resulting from this port would impact southeastern Montana and Northern Wyoming, where coal seams act as aquifers. Digging them up endangers water quality and quantity, and negatively affects agriculture. Mining companies have fully reclaimed less than 10% of mined lands, and reclamation has not been contemporaneous. Water is the last and most difficult step in reclamation efforts.

Domestically and globally, markets are moving against coal. Instead of investing in new coal infrastructure, we should be investing in clean energy. It makes no sense to build an export terminal for coal when companies that have invested heavily in coal are going bankrupt.

People living today have the opportunity to be the ones who chose to change the course we are on for the security and happiness of future generations. We are running out of time and must do the right thing now. Please choose the NO Action option.

Thank you for your time and efforts. We spoke at the Spokane hearing last month and appreciate the serious attention you extended to everyone.

Sincerely,
Harold and Jan Hoem