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June 11, 2016

MBTL SEPA Draft Environmental Impact Statement
c/o ICF International
710 Second Ave, Suite 550
Seattle, WA 98104

Re: Objections to MBTL on numerous grounds: health and safety, railroad deterioration, unsafeness of ship transport, global warming, and economic unviability

Dear Sepa Committee on MBTL DEIS:

As indicated above, my concerns about the proposed MBTL are legion. To start with, some can be focused on the dangers of coal dust intrinsic to the proposed terminal. Health concerns about coal dust coming off the proposed mound of coal at the terminal itself have been covered with far more expertise than I possess by the numerous health professionals who have offered testimony in this regard. Please pay due heed to their collective eloquence.

What has not been covered sufficiently is the danger coal dust on the railroads presents to the entire railroad corridor through the state up to Longview. The coal dust is so fine that it clogs the drainage of the road bed. The tracks are then more subject to sagging and therefore to derailment. The degraded railroad beds make the tracks more hazardous not only for the coal trains but for all the other trains that use the same tracks--oil trains, Amtrak, and miscellaneous freight. The 6-3-2016 oil train derailment near Mosier, OR in the Columbia Gorge underlines the necessity of keeping the tracks in the best condition possible to protect human safety, the environment, and affected business interests. Nor does the surfactant on the coal cars prevent coal dust from lifting off the trains, not to mention the considerable problems with the surfactants themselves. In a word, the coal trains contribute to making the rails unsafe. We need to phase out coal, not encourage more mining, transport, and export of it.

Other people have testified at length on concerns about global warming resulting from burning coal, a concern I heartily share and feel compelled at least to mention among my most pressing objections to this proposed terminal. Suffice it to say that a short-term theoretical economic gain that threatens the now-fragile climate stability of the entire planet at the expense of Washington State's treasured environment is economic foolishness of a breathtaking caliber.

There was nowhere near enough expert testimony outlining the risks of shipping the coal down the Columbia River, which simply may not be deep enough in places to accommodate the huge heavy ships intended to transport it. With reduced river flows such as we experienced in our area last year, problems with drafting are likely to increase

as erratic tributary flows can be expected more as the norm, thanks to global warming, than they historically were. Finally, these ships will encounter the treacherous bar at the mouth of the Columbia at Astoria, where they present a near-certainty of accidents before they make it out to the open sea.

Of course, the economic harms to salmon fisheries, recreational boating, Native American treaty and subsistence fishing rights all need due consideration. Such consideration has been neglected to this point in the DEIS deliberations and will be hard indeed to come by if MBTL goes through.

One could almost understand the desire for this project if it made economic sense. It does not. Numerous coal companies, most recently Peabody but more amazingly Millennium itself, have declared bankruptcy because of ever-lessening demand for coal. Cheaper markets for coal are available to China from Indonesia, and coal has simply been superseded by other, more efficient and often cleaner forms of energy. The economic promises of a dying enterprise are hardly worth the treasures of human health, safety, environment, and climate stability that we would be paying for this dirty and outmoded commodity. The limited number of jobs the project would ultimately provide if it were approved would likely be sadly short-lived, and they emphatically would not be worth the cost of their brief duration. It seems far more likely that when Millennium well and truly goes bust, Washington taxpayers in general and Longview taxpayers in particular will pay more in cleanup, lost property values, and health costs than they ever got from this doomed project. If MBTL is allowed, it seems likely to be nothing more than another taxpayer subsidy of a politically-connected but economically-incompetent industry.

It is within your purview to reject this project outright for all the reasons sketched above, along with numerous others covered by testimony of other people. Failing rejection, please craft the most rigorous standards your expertise can muster to mitigate the effects of MBTL on health, the integrity of railroad infrastructure, global warming, ship transport of coal through the Columbia and its Astoria bar, and MBTL's economic solvency. I emphasize here that the only mitigation possible regarding global warming is outright rejection of the project itself.

Please do your utmost to protect the citizens of Washington State and our treasured environment as you carry out your deliberations.

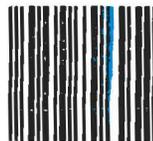
Yours most sincerely,


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