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**Idaho Conservation League**

PO Box 2308, Sandpoint, ID 83864  
208.265.9565

June 7, 2016

RE: Comments on Millenium Bulk Terminals-Longview

Millennium Bulk Terminals EIS  
c/o ICF International  
710 Second Ave., Suite 550  
Seattle, WA 98104

Dear Washington DOE, USACE and Cowlitz County Commissioners,

I'm submitting these comments on behalf of the Idaho Conservation League. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent more than 25,000 supporters, who have a deep personal interest in the health and safety of their families, as well as the clean water, clean air and extraordinary quality of life that Idaho has to offer.

We believe that the proposed Millenium Bulk Terminals-Longview Project will have a detrimental effect on the health, safety, environment and quality of life for the thousands of people who live along the Montana Rail Link and BNSF rail lines that carry Powder River Basin coal through Idaho. And while we recognize that the U.S. Army Corps is taking a narrow scope in this review, and that the Department of Ecology and Cowlitz County are Washington state entities, we urge you to consider the impacts of this proposal beyond the state's borders. Many of our concerns are similar to those of Washington state residents who also live along the rail lines that will carry coal to this terminal. One key difference is that while Washington state may enjoy some economic benefits from the proposal – job creation at the terminal site, for instance – Idaho will enjoy none of those benefits. We are left with the risks alone.

We urge you to choose the No Action alternative for the following reasons:

1) Risk of derailment and spills: The DEIS predicts more than 11 rail-related accidents every year across the state of Washington, and 19 coal train accidents annually when other projects are considered. These numbers do not consider the potential number of accidents that could occur in Idaho or Montana. Unlike Washington State, Idaho is uniquely reliant on BNSF and the other railways to conduct adequate inspections of their railroad tracks. Idaho has none of its own track inspectors. The only independent track inspector, employed by the Federal Railroad Administration, covers all of Idaho, Eastern

Washington and Montana. Furthermore, coal dust escapes onto the tracks creating additional maintenance concerns for the railroad. The validity of coal dust concerns has been confirmed by the work of Daniel A. Jaffe at the University of Washington, whose 2014 study showed a distinct pattern of coal dust emissions from Powder River coal trains in the Seattle area.<sup>1</sup> We have heard anecdotal evidence that people who live next to the tracks in Hope, Idaho, find coal dust gathering on their windowsills. That dust also settles into ballast of the rail lines.<sup>2</sup> This causes maintenance problems for the tracks and can lead to derailments. As coal train traffic increases, we increase our odds of a derailment. Idaho and Montana will not receive any additional funds from this project to mitigate for this lack of scrutiny.

The federal government has predicted 10 derailments per year of trains carrying highly volatile cargo such as Bakken crude oil, which travel these same tracks. The study estimated a severe accident could cause \$6 billion in damages and kill 200 people in a populated area.<sup>3</sup> An oil train derailment would be catastrophic, as well, in the more rural North Idaho. There also can be no way to mitigate for an explosive oil train derailment if it were to happen in one of Idaho's rural communities, where many homes, businesses and schools are in the blast zone.

2) Risk to Waterways: North Idaho is known for its abundance of lakes and rivers. Because of the way the railroads were developed, railroad tracks were often built adjacent to lakes and rivers, putting our waterways in harm's way. Most of the coal that comes through Idaho travels on Montana Rail Link's route, which follows the Clark Fork River and the north shore of Lake Pend Oreille.

Lake Pend Oreille is critical habitat for bull trout, a threatened species, and also is the water sources for the cities of Sandpoint and Priest River, not to mention dozens of individual homeowners who draw their water from the lake or river. Coal is already being found in the waters and shores of Lake Pend Oreille, as chunks of coal spill off the tops of open rail cars. Coal contains many heavy metals that are harmful to aquatic and human life. It's unclear how either the gradual cumulative build up of coal dust and chunks in the waterways, or a catastrophic spill, might effect the chemical environment of the lake. Cleaning up a spill from a derailed coal train would be a difficult proposition, if not impossible. If a spill were to happen in Lake Pend Oreille in the winter, response time would be complicated by the low lake level and the fact that few boat launches are available to get response teams into the water.

3) Health impacts:

- The additional trains will adversely affect the health of people living near the tracks. Diesel fumes are particularly harmful for vulnerable populations.<sup>4</sup>

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<sup>1</sup> Jaffe, Daniel A., Greg Hof, Sofya Malashanka, Justin Putz, Jeffrey Thayer, Juliane L. Fry, Benjamin Ayres, and Jeffrey R. Pierce. "Diesel Particulate Matter Emission Factors and Air Quality Implications

<sup>2</sup> "BNSF Coal Dust FAQs." *Coal Train Facts* RSS. N.p., 2011. Web. 09 Sept. 2015.  
<<http://www.coaltrainfacts.org/docs/BNSF-Coal-Dust-FAQs1.pdf>>.

<sup>3</sup> Brown, Matthew. "Fuel-hauling Trains Could Derail 10 times a Year in U.S., Report Says." *The Spokesman-Review* [Spokane, WA] 23 Feb. 2015: Print.

<sup>4</sup> Abbott, Dale, MD, and Et Al. "Whatcom Docs Position Statement and Appendices." *Coal Train Facts* RSS. Coal Train Facts, 08 Mar. 2011. Web. 10 Sept. 2015.

- Many communities also are impacted by the noise pollution caused by the requirement of trains to sound whistles at crossings. To address this problem, Sandpoint has recently allocated \$60,000 from its budget to install whistle-free safety devices at two crossings in the city, but cannot afford to equip all crossings with the devices. Other smaller communities, such as East Hope, ID, and Athol, ID, have similar noise concerns, but cannot afford to install the equipment on even one crossing to reduce the sound pollution.
- Coal dust is a real problem. Anecdotally, we know people in the Hope, Idaho, area have experienced coal dust build up inside their homes, and recent University of Washington studies confirm that dust escapes from coal cars. We know that coal contains toxic metals such as mercury and lead, and that it causes severe lung problems in miners. We don't have enough studies to determine how serious health effects are when coal dust is combined with diesel fumes in the vicinity of railroads. We are concerned, also, that this Draft EIS was released prior to the completion of the health impact assessment that was commissioned by the state in order to inform this process. There are too many unanswered questions regarding health impacts to approve this facility.

4) Traffic Concerns: Rail traffic is expected to dramatically increase from both Bakken oil trains and coal trains through North Idaho. North Idaho has dozens of unprotected at-grade crossings. The increase in trains will mean more tragic accidents at crossings as impatient drivers try to "beat the train." Additionally, stopped traffic at at-grade crossings means delays for emergency vehicles, making a life or death difference for waiting patients. Traffic delays are expected to increase by 1 to 3 hours per day from increased coal train traffic if the Millennium Bulk Terminals-Longview project is built.<sup>5</sup> Many at-grade crossings will need improvements to deal with the increased traffic. Our local and state jurisdictions simply do not have the funds to pay for overpasses and underpasses. Unless required as a mitigation measure, railroads are not required to pay for crossing improvements, leaving taxpayers footing the bill for essential safety infrastructure made necessary by this industrial expansion.

5) Economic Impacts: In Sandpoint, expanded rail traffic will result in a negative impact on the economy. Using DOT's guidelines, the City of Sandpoint has computed that the current wait time impact on our local economy is about \$350,000 per year. With no change in traffic or rail crossings the city could reach well over \$1 million in total loss in just four years, according to the City of Sandpoint's analysis. Increased train traffic impacts the flow of goods and services. As delay and isolation increases, business owners may decide it is no longer feasible to operate here. Contemporary research indicates that significant increases in train traffic can reduce property values of residential homes within 750 feet of the track by as much as 5 to 7 percent.<sup>6</sup> With the multiple fossil fuel projects now in the permitting process, homeowners could lose an average of \$8,000 in home value. As a community, this would represent about a \$2 million loss of taxable

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<sup>5</sup> De Place, Eric. "The Wrong Side of the Tracks." *Sightline Daily*. Sightline Institute, 12 Sept. 2013. Web. 11 Sept. 2015. <[http://daily.sightline.org/blog\\_series/wrong-side-of-the-tracks/](http://daily.sightline.org/blog_series/wrong-side-of-the-tracks/)>.

<sup>6</sup> Robert A. Jaouhari Simons, and Abdellaziz El. "The Effect of Freight Railroad Tracks and Train Activity on Residential Property Values." *Appraisal Journal* 22 June 2004.

value.<sup>7</sup> We already have anecdotal evidence of lost economic opportunities from the proposal to haul millions of tons of coal through our community. A local Realtor has testified before the Sandpoint City Council that proposals to build coal export terminals on the West Coast cost him the sale of a home in the otherwise higher end Ponder Point neighborhood near the Montana Rail Link tracks. It is reasonable to expect further lost property sales in the face of expanded coal shipments through our communities.

6) Climate Impacts: Building this facility will add massive amounts of carbon annually to the earth's atmosphere. The Draft EIS estimates that building this terminal will result in up to 27 millions tons year of carbon dioxide being released into the atmosphere per year – which would make it one of the largest emitters of carbon dioxide in the state of Washington. In Idaho, like many western states, we're suffering severely from drought and wildfires, both the results of climate change. Last summer, we struggled through multiple days of air quality labeled as "hazardous" in various communities throughout North Idaho due to multiple large wildfires. One of our most popular whitewater rivers – the Main Salmon – was closed to boaters due to wildfire danger. National forests around North Idaho were closed to hikers, campers and hunters. Many homes and lives were lost last summer due to wildfires. Our winters are shorter and our snowpack less, and winter and spring floods are more intense. While our snowpack in North Idaho was normal this past winter, April was one of the hottest years on record and the runoff was swift, leaving us again the potential for a hot, dry, dangerous fire season. Given this context, the addition of 27 million tons of CO2 to our atmosphere annually will only exacerbate these issues particularly at a time when we need to be reducing CO2 emissions.

In conclusion, we do not believe these impacts can be mitigated, and therefore we urge you to choose the "No Action" alternative.

Thank you for the opportunity to comment.

Sincerely,



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<sup>7</sup> Yost, Jared. *Economic Impact of Increased Rail Traffic through Sandpoint, Idaho*. Rep. Sandpoint, ID: City of Sandpoint, 2015. Print.



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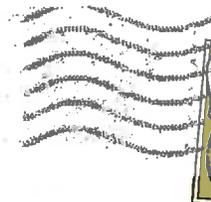
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