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Vancouver WA 98668-1995

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MBTL COAL EXPORT TERMINAL EIS  
C/O ICF INTERNATIONAL  
710 SECOND AVE STE 550  
SEATTLE WA 98104

IAAJ55B 98104





City of Vancouver • P.O. Box 1995 • Vancouver, WA 98668-1995  
www.cityofvancouver.us

September 30, 2013

MBTL Coal Export Terminal EIS  
c/o ICF International  
710 Second Ave., Suite 550  
Seattle, WA 98104

Elaine Placido, SEPA Responsible Official  
Cowlitz County Department of Building and Planning  
207 4<sup>th</sup> Avenue North  
Kelso, WA 98626

**SUBJECT: SEPA SCOPING COMMENTS ON MILLENNIUM BULK TERMINALS  
LONGVIEW LLC COAL EXPORT TERMINAL (MILLENNIUM)**

Thank you for the opportunity to comment on the SEPA Scoping Notice for potential impacts of the proposed Millennium Coal Export Terminal upon the City of Vancouver and its citizens. Vancouver is uniquely situated at the intersection of major rail corridors which lead to points east and north and south. The BNSF rail lines run through the City of Vancouver East-West along the Columbia River and North-South west of the downtown. A significant amount of rail freight traffic travels through Vancouver city limits and most, if not all, of the coal trains headed to or from the Millennium facility will pass through Vancouver city limits.

As reflected in the City Council's Resolution of July 16, 2012 (attached), and in public testimony received at a Clark College forum on the project on December 12, 2012, the City of Vancouver has a number of concerns with the project in regard to potentially significant adverse impacts.

Please include the following in your Scoping Notice, to be addressed in the Draft Environmental Impact Statement (DEIS):

1. Impacts from Coal Dust. Substantial uncertainty exists, including contradictory evidence, about the potential environmental effects from coal dust that may blow off or otherwise escape the coal cars. The EIS should study and conclusively determine what direct and cumulative impacts may occur to human health and natural systems such as wetlands, soil,

vegetation and streams. How much coal dust is likely to blow off or shake out of the open coal cars, based on the latest scientific studies? Serious consideration should be given to requiring that all coal cars which access the Millennium Terminal be covered during transport in order to mitigate such impacts to a level of non-significance.

2. Blocked Crossings. Vancouver has as many as 18 private at-grade crossings and at least 8 public at-grade crossings. Given the projected length of the trains (up to a mile and-a-half per train) and the projected number of trains per day (as many as 20) that will be moving through Vancouver, there will be substantial delays at at-grade vehicle crossings. Such delays will result in increased residential and commercial traffic congestion, lost productivity, increased tailpipe emissions from idling vehicles, etc. Direct and cumulative impacts from blocked crossings need to be studied in the EIS, and mitigated to a level of non-significance.
3. Delays to Emergency Responders. Some residential areas along the Columbia River could be entirely cut off from emergency responders due to the length of the trains and slow speeds of the trains in city limits, or from trains that are stopped waiting for other trains to move. Emergency responders may have no alternative but to access such areas by boat. How will blocked crossings impact the ability of the fire department to respond to a fire or medical emergency, or the police to respond to a crime in progress? Such direct and cumulative impacts should be studied in the EIS and mitigated to a level of non-significance, which should include ongoing funding for the operation and maintenance of the City's fire boat and associated staff.
4. Impacts from Surfactant. To what extent does the chemical surfactant that is sprayed on the coal to minimize airborne transport of dust break down over time and under different weather conditions (e.g. heat, cold, precipitation, etc.)? What are the chemical components in the surfactant, and when the surfactant breaks down and is transported into the air, what are the potential health hazards and impacts to water, soil and vegetation? Direct and cumulative impacts from airborne or deposited surfactant released from the coal cars should be studied in the EIS. Again, mitigating such potential impacts by requiring the coal cars to be covered should be considered in the EIS.
5. Train Horn Noise. As noted above, there are at least 26 at-grade crossings within Vancouver city limits, and many of these are unsignalized crossings. Impacts from train horn noise to nearby residents or employees from as many as 20 additional trains per day should be studied in the EIS, and mitigated to the extent possible.
6. Increase in Train Diesel Emissions. It has been reported that, due to the anticipated length of the trains (up to one and a half miles), additional engines to pull or push the cars will be required, which will significantly increase localized impacts from diesel emissions. If each train requires twice the number of engines to haul the coal cars than a typical freight train, then the impacts from diesel emissions would be comparable to 40 trains per day, instead of 20. What are the potential adverse health impacts to nearby residents or employees from such an increase? What are the impacts to the local or regional air quality from such an increase? The amount of diesel emissions from the total number of engines needs to be quantified and the direct and cumulative health and air quality impacts should be studied in the EIS and mitigated to a level of non-significance.

7. Cumulative Impacts from Other Coal Export Facilities. The proposed Millennium Export Terminal is one of several coal export facilities that are proposed in the States of Washington and Oregon. Cumulative impacts that can be reasonably anticipated from all other proposed coal facilities, whether or not a permit application has been filed, should be studied in the EIS, and potentially significant impacts mitigated to a level of non-significance.

Again, thank you for the opportunity to provide comments on the SEPA Scoping Notice for the Millennium facility. We look forward to commenting further once the Draft EIS is made available for public comment.

Sincerely,



Chad Eiken, AICP, Director  
Community and Economic Development Department  
(360) 487-7882  
[chad.eiken@cityofvancouver.us](mailto:chad.eiken@cityofvancouver.us)

- c Mayor and City Council  
Eric Holmes, City Manager  
Barbara Ayers, Communications Manager  
Jan Bader, Program Manager  
Joe Molina, Fire Chief  
Chris Sutter, Acting Police Chief  
Ted Gathe, City Attorney  
Stephanie Rice, The Columbian

07/16/12

RESOLUTION NO. M-3778

A RESOLUTION of the City Council of the City of Vancouver, Washington, expressing concern regarding the impact of increased coal transport rail traffic in Vancouver resulting from proposed coal export terminal projects in Whatcom County Washington, Cowlitz County Washington, Grays Harbor County Washington, Morrow County, Oregon, Coos County, Oregon and Columbia County, Oregon and requesting that the agencies reviewing the Environmental Impact Statements (EIS) for said projects, including federal, state, and local agencies, include impacts, both direct and cumulative, along the train and Columbia River routes for freight moving to the proposed terminals in the EIS and that at least one of the EIS Scoping hearings and one of any other subsequent hearings related to the EIS for each coal export terminal project be held in Clark County.

WHEREAS, the Burlington Northern Santa Fe (BNSF) track runs through and bisects the city of Vancouver running east/west; and

WHEREAS, another BNSF line runs north/south through the City of Vancouver, uses a railroad bridge located in southwest Vancouver to cross the Columbia River to points in the State of Oregon, and the bridge and line are also used by Union Pacific trains; and

WHEREAS, there are proposed coal export terminal projects in Whatcom County Washington (the Gateway Pacific Terminal Project, or GPT) and Cowlitz County Washington (Millennium Project) in addition to possible proposals for Grays Harbor County Washington as well as Morrow, Coos and Columbia counties in Oregon; and

WHEREAS, the City of Vancouver supports projects that create jobs and provide a healthy economy locally and regionally and understands that many permanent and potentially thousands of temporary construction jobs are at stake with the coal terminal proposal, and

WHEREAS, the City of Vancouver, in partnership with the Port of Vancouver, is investing millions of dollars in public funding to improve its waterfront area with the intention of attracting new jobs and improving rail capacity; and

WHEREAS, the City of Vancouver supports the rail expansion project underway at the Port of Vancouver which will create additional capacity to move goods and freight; and

WHEREAS, the proposals (except Morrow County), if completed, will result in significant new rail traffic through Vancouver, including at least twenty additional trains per day of up to one and half miles long; and

WHEREAS, the Morrow County proposal will result in additional barge traffic along the Columbia River near the City of Vancouver; and

WHEREAS, this increased rail traffic will have impacts in Vancouver including but not limited to increased traffic congestion and delays to residents and commerce, increased tail pipe emissions from stopped and idling vehicles and increased diesel emissions; and

WHEREAS, Vancouver has been made aware of potential impacts from coal dust and other particulates that may be blown from open rail cars and barges including air and soil pollution and health impacts but has no way to evaluate such potential impacts; and

WHEREAS, Whatcom County, Washington Department of Ecology and the United States Corp of Engineers have entered into an MOU to jointly promulgate the required EIS and are currently scoping the EIS for the GTP project; and

WHEREAS, Cowlitz County is evaluating an application and developing an EIS for the Millennium project and Washington Department of Ecology and the United States Corp of Engineers are also involved such evaluation; and

WHEREAS, the nature and scope of the environmental review for the other coal export terminal proposals has yet to be determined; and

WHEREAS, said agencies should include the impacts of coal-based export facilities, including increased rail traffic and coal dust, in the scope of the EIS for each coal export terminal project, and public hearings at the various stages of the EIS process should be conducted in Clark County; and

WHEREAS, the Federal National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) require the consideration in environmental review of both the direct and indirect impacts of the terminal proposals including off-site impacts along the rail lines used to deliver coal to the terminals; and

WHEREAS, NEPA and SEPA require the consideration in environmental review of the cumulative impacts of all of the terminal proposals including those actually applied for and those that are reasonably foreseeable; and

WHEREAS, substantial uncertainty exists, including contradictory evidence, about the environmental effects of coal dust potentially escaping from the trains, potential impacts on water quality resulting from coal barge traffic, and the number and size of trains using the tracks passing through the City of Vancouver; and

WHEREAS, uncertainty regarding coal trains and barges passing through or near Vancouver should be clarified in NEPA and SEPA review; and

WHEREAS, the City of Vancouver wishes to become a Party of Record regarding all of the coal terminal projects proposed in the states of Oregon and Washington.

**RESOLUTION - 3**

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF VANCOUVER:

Section 1. We urge all local reviewing Washington and Oregon agencies, the Washington State Department of Ecology, reviewing Oregon State Agencies, and the United States Army Corps of Engineers to include impacts of the proposed coal export facilities on Vancouver, including but not limited to increased traffic congestion and delays to residents and commerce, increased tail pipe emissions from stopped and idling vehicles, increased diesel emissions and potential impacts from coal dust and other particulates that may be blown from open rail cars and barges in the scoping of the EIS for both the GPT project and the Millennium project and all coal export terminal projects reasonably foreseeable in the states of Washington and Oregon.

Section 2. We urge all local reviewing Washington and Oregon agencies, the Washington State Department of Ecology, reviewing Oregon State Agencies, and the United States Army Corps of Engineers to conduct an analysis of the cumulative impacts of the GPT and Millennium project and all coal export terminal projects reasonably foreseeable in the states of Washington and Oregon through a SEPA and NEPA environmental impact statement process.

Section 3. We urge all local reviewing Washington and Oregon agencies, the Washington State Department of Ecology, reviewing Oregon State Agencies, and the United States Army Corps of Engineers to conduct at least one EIS scoping hearing for each coal export terminal project and at least one of any subsequent hearings related to the EIS for all coal export terminal projects proposed in the states of Washington and Oregon at a location in Clark County.

Section 3. We request that the City of Vancouver be made a Party of Record for all coal export terminal projects proposed in the states of Washington and Oregon.

Section 4. That this Resolution shall take effect and be in full force upon passage and signatures hereon.

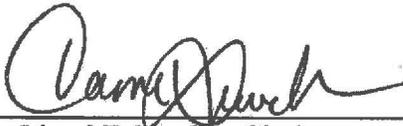
**RESOLUTION - 4**

ADOPTED at regular session of the Council of the City of Vancouver, this 16th  
day of July, 2012.



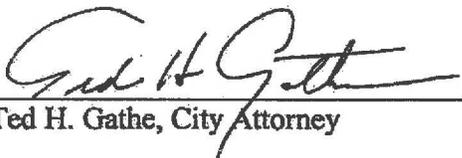
Timothy D. Leavitt, Mayor

ATTEST:



R. Lloyd Tyler, City Clerk  
By: Carrie Lewellen, Deputy City Clerk

APPROVED AS TO FORM:



Ted H. Gathe, City Attorney