



October 16, 2013

Millennium Bulk Terminals-Longview EIS,
c/o ICF International,
710 Second Avenue, Suite 550,
Seattle, WA 98104

Re: Scope of EIS Studies for Gateway Pacific Terminal (GPT)

The Tahoma Audubon Society (TAS) and its 1,400 members who live in Pierce County would like to share our concerns about the proposed coal trains which would deliver coal from the Powder River Basin of Wyoming and Montana to Longview, Washington for export overseas.

We are opposed to the use of Port of Longview Terminals on the Columbia River to ship over 48 million tons of coal per year using railroad lines adjacent to the Columbia River.

Please address the following concerns in the Environmental Impact Statement:

Air & Water Quality: Each train will release one pound of coal dust per container per mile. The cumulative impacts of this release should be studied for the 250 miles of tracks adjacent to the Columbia River between Richland and Longview.

This toxic pollutant is harmful to the health of fish and wildlife. Several species and their habitat are protected by the Endangered Species Act from degradation. Scoping should determine the effect of coal dust on both federally and state listed fish and wildlife species. The impacts from coal dust on each stream crossed by the railroad and along the banks and estuaries of the Columbia River should be studied.

Vehicle emissions: Eighteen long trains each day will increase the number of idling vehicles waiting for trains and slow truck and passenger train traffic in cities and towns along this route. Studies should determine the increase in pollution and examine the effect of cars and trucks idling while a 60 mile long train passes through these crossings at 20 mph each day. The economic impact of slowing trucks and the deliveries of goods

and services in our state's economy should be evaluated and documented within the scoping process.

Coal dust containment: Some 500 pounds of coal dust are lost on each car en route from Montana and Wyoming according to Burlington Northern. Are their methods of covering rail road cars adequate and what are the costs of containing escaped dust? Determining cost would assist decision makers determine mitigation at the next stage of the EIS process.

Transshipment facilities: Studies of coal storage facilities at Longview should review dust released from railroad cars and from loading ships. Should the coal be stored in covered areas to prevent contaminated rain water and surface water runoff from entering the Columbia River?

Ocean Acidification: Puget Sound and the Pacific Ocean are already heavily distressed by ocean acidification. Shellfish growers are already seeing the impact that ocean acidification has on the ability of oysters to reproduce. Scoping should review the current level of ocean acidification and determine the impact that burning this additional amount of coal will have on the global environment.

Cumulative effect: What is the tipping point of environmental damage to the Columbia River estuary from the transshipment of 48 million tons of coal per year? How long will the coal export facility operate and what is the total cost to the environment? Is it offset by job and tax increases for the city of Longview? The result should be measured in loss of habitat, ocean acidification by each year of operation and include increased vehicle emissions from waiting vehicles at train crossing.

In Tacoma, Washington, Asarco operated a copper smelting plant for 100 years. When it closed the unpaid cost of cleanup was \$100 million. What will be the unpaid cost of operating the Longview export facility? Is the increase in jobs and taxes enough to offset the environmental costs?

Global Warming: Worldwide, every country shares in the fate of the planet as average temperatures increase each year, resulting in extreme weather events, flooding, hurricanes and the loss of food supply due to droughts and sea water temperatures. Within the last 10 years a change in sea temperatures off the coast of Washington due to climate change has affected the food supply provided from coastal fishing both for migrating birds and humans.

The geographic scope of the EIS should be extended to include the impact on the Columbia River and on the coasts of Oregon and Washington, the shellfish industry, coastal fish and wildlife and the health of their habitats.

Greenhouse gases: The greenhouse gas emissions generated in China, who is the end-user of coal, needs to be studied. There is a direct effect on the health of China's

citizens from increased air pollution and the destruction of their forests and farming areas from acid rain.

Pacific Ocean Currents: What are the impacts of China burning coal on climate change on the Columbia River and Puget Sound? Will it influence the earth's temperature, wind patterns, precipitation, and intensity and frequency of storms in Washington State?

The connecting link is the Japanese current traveling north along the western Pacific, which ultimately delivers sea water to Coastal waters in Alaska and Canada. Ultimately, how will climate change effect the Puget Sound basin's growing season for agriculture products and fishing in Alaska and the state's coastal waters and Columbia River system?

Both China and the United States are the largest users of coal for energy and neither are signers of global treaties to limit greenhouse gases. However, Washington state law discourages greenhouse gas pollution and coal power.

Scoping should study if providing cheap access to coal from the Millennium facility will discourage China from developing alternatives to burning coal.

The answers to these question and more rests in your hands. Let your Environmental Impact Statement show us the cost of public dollars necessary to clean up the damage of transporting coal along the Columbia River and transshipment to Asia. Let us know the cost of mitigation per year, and then inform the people of China and Washington State about these costs.

Sincerely,



Krystal Kyer

Executive Director

