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together*

CITY
OF **LACEY**

420 COLLEGE STREET SE
LACEY, WA 98503-1238

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SCOTT H. SPENCE

November 6, 2013

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

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 in Longview, WA on the citizens of the City of Lacey.

Lacey is uniquely situated at the south end of Puget Sound with approximately two miles of Burlington Northern Santa Fe rail line located adjacent to Lacey's southerly city limits. Adjacent to the rail lines are hundreds of homes, two city parks, two elementary schools, and area lakes. It is expected the trains headed to or from the Millennium facility will pass through this area many times per day.

The City of Lacey has several concerns related to potentially significant adverse impacts related to the proposal and requests that the following be included for analysis in the Draft Environmental Impact:

1. Impacts from coal dust. Burlington Northern Santa Fe estimates that each uncovered coal car loses approximately 500 pounds of coal dust en route to west coast terminals. Substantial uncertainty exists related to human and environmental health impacts from coal dust. The EIS should study and conclusively determine potential human and environmental impacts related to coal dust associated with the proposal. Serious consideration should be given to require all coal cars that access the Millennium Bulk Terminal be covered during transport in order to mitigate potential coal dust impacts.
2. Impacts from potential train derailments. South Lacey includes several area lakes and waterways that could be impacted should a train derailment



TDD Relay
1-800-833-6388

City Council
(360) 491-3214

City Manager
(360) 491-3214

City Attorney
(360) 491-1802

Community Development
(360) 491-5642

Finance
(360) 491-3212

Parks & Recreation
(360) 491-0857

Police
(360) 459-4333

Public Works
(360) 491-5600

Fax #
(360) 438-2669



occur, specifically, Pattison Lake which the BNSF rail line travels directly over and Chambers Creek which is directly adjacent to the BNSF line. Additionally, several City water sources are located in the vicinity. Should a derailment occur in this area, environmental impacts to area surface and groundwater could be substantial. The City of Lacey requests that impacts and mitigation measures be analyzed in the draft EIS related to impacts of potential derailments.

3. Noise and transportation impacts from additional train traffic. The Thurston Regional Planning Council estimates that approximately 40-60 trains (freight and passenger) pass directly adjacent to the Lacey city limits each day. Noise impacts for Lacey residents in this area related to trains and train horns are already substantial. Adding additional trains to this section of the BNSF system would contribute to additional noise issues in this area. Noise mitigation measures should be analyzed in the draft EIS for the additional train traffic as a result of the Millennium Bulk Terminal.

Thank you again for the opportunity to provide comments on the SEPA Scoping Notice for the Millennium Bulk Terminal facility. We look forward to commenting further once the Draft EIS is made available for public comment.

Sincerely,



Rick Walk, AICP
Community Development Director

Cc: Mayor and City Council
Scott Spence, City Manager
Ryan Andrews, Associate Planner