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October 24, 2013

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

Re: Scoping Comments for the Millennium Bulk Terminal Environmental Impact Statement.

To whom it may concern:

Millennium Bulk Terminals is proposing to locate a 44 million ton per year coal export facility adjacent to the City limits of Longview. The project is within the City's Planning Area Boundary (aka Urban Growth Boundary). Any train or truck traffic must pass through Longview City limits to reach the site. The City of Longview shares water and air sheds with Cowlitz County. Thus, the citizens of Longview will be affected by the project. These scoping comments are submitted to you on behalf of the Longview City Council.

Please analyze, examine alternatives and outline proposed mitigation for the following:

Transportation impacts: Under the proposal, coal will be brought to the export facility via unit trains. These trains will result in City streets being blocked more often causing traffic delays for commerce and citizens. Of special concern is the impact to life safety and property protection due to blocked response routes. The increased rail traffic will also increase the potential for rail/car and rail/pedestrian accidents.

Trucks and other vehicles will primarily access the site via State Route 432. This route already services a high amount of truck traffic. The proposal's impacts on this existing infrastructure needs to be evaluated.

Air shed impacts: The proposal will result in a substantial increase in train, ship and truck traffic to the area. These modes of transportation all rely heavily on diesel fuel. The City is also concerned about the impacts of coal dust from the handling, moving and storing of coal. Please analyze the impacts of the diesel fumes and coal dust to the local air shed.

As part of the EIS process, the monitoring of air quality needs to be done at several locations in neighborhoods near the facility. This will help determine base line levels that can be used to determine the impacts of coal dust once coal export facility operations start.

Surface water impacts: The Columbia River contains several threatened and endangered fish species. In addition, mammals such as sea lions and seals travel the river. The impact on fish and wildlife from the coal export facility needs to be analyzed. The analysis needs to include whether coal will impact the food chain adversely affecting high fish consumers. The economic impacts on fisheries (tribal, commercial, and recreational) need to be considered also.

In addition, errant coal dust eventually settles on the ground and can be washed into the City's stormwater system. This could impact the City's ability to meet state and federal stormwater standards.

Groundwater impacts: As currently proposed, the coal export facility operations will take place less than one mile from the City's groundwater drinking water source. An analysis needs to be done to ensure that the project will have no adverse impact to the City's potable water source.

Noise and vibration impacts: Rail operations, including train engines, whistles and crossing signals will produce noise. In addition, much of the terminal operations will take place outdoors and will produce noise. Atmospheric conditions in the area often allow noise to travel further than expected. Nearby residential areas will be affected. However, there is also a potential the hillsides and other areas of the City may be adversely impacted as well.

Soils in the area are conducive to transmitting vibrations. Over time, this can cause ground settling and potentially building damage. It can also disrupt households and businesses.

Lighting impacts: As proposed, the facility will be operating 24 hours a day/7 days a week. Thus, night time lighting will be needed. The City recognizes that lighting is needed for the safe operation of the facility. However, that lighting will affect view shed for the area. Many of City residences have views of the Columbia River. State of the art lighting systems should be examined that will ensure a safe working environment while minimizing lighting impacts on the area.

Emergency service impacts: In addition to the concern of trains blocking emergency response routes discussed above, other concerns need to be addressed. These include the

impacts a coal fire or other emergency (e.g. earthquake) will have on the safety of citizens, employees, first responders and the environment. An analysis of the site layout needs to be conducted to ensure there is adequate emergency service access to the entire site. Emergency service analysis should also include the role of facility personnel and onsite fixed systems to provide emergency services versus what public services are available and needed in light of the current level of fire department and police department resources.

Economic effect on local economy: As proposed, the coal export facility will provide over 100 permanent jobs and over a 1,000 temporary construction jobs. The new facility will be making substantial expenditures in the community and adding to the communities' tax base. However, new business can have both positive and adverse impacts to a community. The positive aspects, additional jobs and their multiplier effect, expenditures in the community and their multiplier effect and the additional tax revenues are relatively easy to estimate. However the adverse impacts to the community are usually not as easy to ascertain.

In this case, the proposal will result in a substantial increase in train traffic resulting in an increase of temporary street blockages. An analysis of the impacts this will have on existing business due to delays in their movement of goods and services needs to be conducted. These delays also may impact workers. Workers will need to leave home earlier to ensure they arrive at work in time and may arrive home later cutting into family time.

Whether deserved or not, coal has a reputation for being "dirty." An analysis needs to be conducted on whether a "coal town" reputation could adversely impact any of the following:

- Recruiting and retaining businesses
- Property values for both commercial and residential
- Recruiting all wage levels of employees
- Attracting tourism

The economic analysis should include an evaluation of what government resources are needed to minimize the impacts of the development. Since resources are scarce, the analysis should include probable funding mechanisms for any mitigation projects.

Environmental Justice: The rail lines that will serve the site are adjacent to the Highlands Neighborhood. This is a low income neighborhood with relatively high residential density. A disproportionately high share of the environmental impacts, including health, economic, and social effects will have the potential to affect this

neighborhood. A careful evaluation on the means to avoid and/or mitigate the impacts to this neighborhood needs to be conducted.

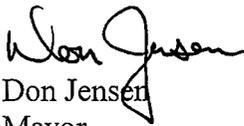
Comprehensive Health Impact Assessment: One method of analyzing the possible health impacts discussed above is to conduct a comprehensive health impact analysis (CHIA). A CHIA uses a combination of procedures, methods and tools by which project may be evaluated as to its potential effects on the health of a population, and the distribution of those effects within the population. The City requests that a CHIA be conducted as part of the EIS process. The CHIA process could take place concurrently with EIS process and its conclusions included in the EIS.

The EIS and CHIA process would be remiss without examining the impact of other coal export facilities on their communities (e.g. coal export terminal impacts on Newcastle, Australia).

Sustainable Viability: Finally, the EIS should examine the need for the coal export facility. The price for coal is highly variable. In the past coal export facilities have been built in the United States (e.g. Los Angeles, CA and Portland, OR) but never fully utilized. Should the facility be built, with its potential to disrupt the community, only to be abandoned later when the price of coal drops?

Thank you for your consideration in this matter. The City looks forward to the inclusion of the above identified potential impacts as part of the Millennium Bulk Terminals EIS study.

Sincerely,


Don Jensen
Mayor

Cc: Elaine Placido, Cowlitz County
George Raiter, Cowlitz County
Sally Toteff, Washington State Dept. of Ecology
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