

I would like to thank the Army Corps of Engineers for conducting a hearing in Spokane, indicating that the agency is willing to address the full scope of the proposal. Residents of Spokane will be adversely affected by the construction of a coal port facility at Longview. For example, I live, literally a stone's throw from the railroad tracks. As it is now, every time a train goes by the entire house shakes. An increase in coal train traffic will adversely impact me and my family through lower property values, increased coal dust and diesel fumes with their consequent health impacts, and diminished quality of life from incessant train traffic.

As required by NEPA, the Army Corps needs to conduct a full EIS that addresses the cumulative impacts of this proposal. Those impacts are not limited to the immediate area of Longview Point, but include impacts from transportation and extraction of the coal. Therefore the EIS needs to examine impacts to communities along the entire route, from the Power River Basin to the West Coast. The potential impacts include: public health impacts, traffic congestion and delays, increased infrastructure costs, loss of wildlife habitat, diminished quality of life, and contribution to greenhouse gas emissions. What are the potential consequences of mining, transporting, and burning 100 million tons of coal on climate change? All of these need to be addressed in the EIS.

In addition, the EIS needs to assess the impact on surface and ground water contamination and air quality. The potential for water pollution from coal train derailment, coal dust, and increased diesel traffic is especially pronounced in the Spokane area with the close proximity of the Spokane Aquifer and its connection to the Spokane River. Degradation of air quality along the rail route also needs to be examined. Given that Washington lies directly in the path of the emissions that will come from burning the coal in Asia, the EIS should assess the potential for increased SO₂ and mercury levels that will result.

Of particular concern to residents of Spokane are the diesel particulates that would result from increase train traffic. Diesel particulates as small as 2.5 microns, known as PM_{2.5}, have a proven track record of causing severe respiratory problems and even death from long-term exposure, as well as being a known carcinogen. The projected increase in train traffic due to coal exports would result in a potential increase of **22,489,760 g PM_{2.5}** in diesel particulates per year over the 50 mile length of Spokane County. Last January, Spokane air quality crossed into "unhealthy for sensitive groups" levels of PM_{2.5}. During winter inversions, Spokane's PM_{2.5} can already exceed 244% of National Air Quality Standards. The projected increase in diesel train traffic to 40-60 more trains per day will greatly increase the health hazards posed by diesel emissions, leading to increased respiratory problems throughout Spokane County. The scope of the EIS needs to address the air quality impacts that will come as a result of increased train traffic.

The first step is to collect year-round data on current PM_{2.5} through several monitoring stations throughout Spokane County and along the railroad route. BNSF needs to provide verifiable information on what Tier diesel engines they will use. What is frequency of Tier 2 vs. Tier 4 engines—which emit different amounts of PM? What verification will the railroad use to insure compliance with air quality standards? If Air Quality standards are exceeded will BNSF stop running trains until those limits are back in compliance? The presence of 40-60 more trains per day will undoubtedly have an adverse effect on Spokane's air quality. What will BNSF do to

insure that Spokane's Air quality standards aren't surpassed?

Because the Longview proposal is just one of five proposed coal port facilities, it is imperative that the scope of the EIS include the cumulative impacts to Spokane of the development of all facilities, as required by NEPA. A piecemeal approach will lead to "death by a thousand cuts" and subverts both the letter and intent of the law. Therefore the EIS needs to evaluate the full impact of the 60 or more coal trains would have upon, not just Spokane, but all the communities from Billings to Longview. The scope of the EIS also needs to address the impacts of strip mining in Otter Creek, Montana. The only market for this coal is in Asia and therefore is directly tied to the Longview proposal.

Sincerely,

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