



Nov. 18, 2013

Re: Scoping Comment on Proposed Millennium Bulk Terminals-Longview Shipping Facility Project

Sent via on-line portal

Dear Army Corps of Engineers, Department of Ecology, and Cowlitz County Officials:

The following comments are submitted on behalf of The Lands Council. The Lands Council strongly opposes the construction of a coal export terminal at Longview, Washington, the transportation of strip-mined coal from Montana and Wyoming on trains and ships throughout the Northwest, and all other connected actions involving the transportation and combustion of the coal.

The Lands Council is a non-profit environmental organization with a mission to preserve and revitalize our Inland Northwest forests, water, and wildlife through advocacy, education, effective action, and community engagement. We have approximately 1,500 members who live across the Northwest. The forests, water, and wildlife, our members, and all human and natural communities are threatened by the proposal now on the table. The proposal illustrates an emerging scientific and philosophical consensus which has become especially pertinent in this era of globalization: Everything Is Connected to Everything Else. The impacts of approving this proposal would be local, regional, national, and global.

At the sites where the coal is mined there would be pollution of air and water, essentially the permanent loss of wildlife habitat, the productivity of the land, and the long-term impacts on lifestyles and local economies. There is an economic cost to increased temperatures. Please read this study:<http://www.sciencedaily.com/releases/2012/08/120807113327.htm> , and this on how delaying climate policy will triple our short term mitigation costs:  
<http://www.sciencedaily.com/releases/2013/09/130912111820.htm>

All along the railroad corridors disruption of traffic would occur, and the resultant increased risks to human safety. The City of Spokane Valley has one above grade crossing. The rest, which are many, are at grade, and the same is true with the four crossings in Cheney. On Sept. 23, to give one example, trains were counted at the crossing at Park and Trent in the Spokane

Valley, and four trains passed by in an hour and a half. The system is at capacity now. It will get much worse if the Longview and two other facilities are built. Rail capacity issues are addressed in the Heavy Traffic Ahead study done in July 2012 which you are aware of from the Cherry Point scoping comments. When an updated study of Heavy Traffic Ahead is published we will submit pertinent information that is new to the scoping process. A serious increase in oil trains is occurring in the Northwest which needs to be considered in calculating potential Longview exports because of capacity and noise and pollution issues mentioned in this letter. The Inland Northwest's largest urban areas will be hammered by trains of all sorts, all vying for time on the rails. The over one mile long coal and oil trains will cause substantial problems for emergency vehicles and school busses. And citizens who are poor or lower middle class will especially suffer since they often live close to the tracks in the above mentioned cities.

Air pollution from emissions of diesel exhaust is a very well-known and significant health problem. There are a few dozen studies on the negative effects of air pollution on humans. Here are two of the most recent ones: Air pollution is responsible for more than 2 million deaths worldwide each year: <http://www.sciencedaily.com/releases/2013/07/130712084455.htm>, and air pollution worsened by climate change will be the most potent killer in the 21st century: <http://www.sciencedaily.com/releases/2013/09/130904105145.htm>.

Noise pollution from trains will increase. Noise is a known health hazard. Here's a study on road traffic in urban areas contributing to sleep disturbance and annoyance. As you are aware, Spokane will get ALL the trains for any and all coal exporting facilities. The increased number will introduce much more noise in urban areas.

<http://www.sciencedaily.com/releases/2012/09/120911091353.htm>. And another study about how air pollution and noise pollution increase cardiovascular risk: <http://www.sciencedaily.com/releases/2013/05/130520142745.htm>

Coal dust, especially because the loads are uncovered, will fall all along the train route from the Powder River Basin to the ports. As trains go through Cheney, downtown Spokane and Spokane Valley, coal dust will impact thousands of people who live and work in these cities, as well as impacting water quality in the Spokane River and smaller tributary streams. Here's a recent report on coal dust that shows more dust escapes from trains than is claimed:

<http://nwpr.org/post/new-research-provides-more-evidence-coal-dust-escaping-trains>.

Surfactants are not necessarily effective, they are not required, and they contain several unknown chemicals that may cause harm to humans and wildlife.

The cumulative impacts of allowing coal to be exported from the Longview terminal must include a consideration of global warming. As part of our mission to protect wildlife, forests and rivers, the Lands Council works collaboratively with other agencies, including the US Forest Service, logging companies and others on three national forests in eastern Washington and northern Idaho. Coal exports will increase global warming and make using and protecting our forest resources harder. Forests are ecosystems that are homes for an enormous variety of microbes, animals and plants. Here are some comments by the USFS on their website: about the threat to forests and grasslands from global warming: <http://www.fs.fed.us/climatechange/>. Research shows there's a rising concern over tree pests and diseases that will increase with a warming climate: <http://www.sciencedaily.com/releases/2013/11/131115094323.htm>.

Wildlife will suffer from global warming caused by increase coal burning in the world: The US Fish and Wildlife Service sees increased global warming as a big threat to wildlife: <http://www.fws.gov/home/climatechange/>. Please read these two studies on climate change and predators: <http://www.sciencedaily.com/releases/2013/06/130617160902.htm>, and this one: <http://www.sciencedaily.com/releases/2013/02/130219091014.htm>. Climate change is a significant factor that will exacerbate the continuing loss of top predators in the world: <http://www.sciencedaily.com/releases/2011/07/110714142133.htm>.

At the sites in Asia where the coal would be offloaded, and along the transportation corridors to the coal-burning plants, there would be similar impacts as we describe above for the Northwest. Additionally, there would be worsening health effects on people in China, as shown in recent media coverage of poor air quality associated with emissions from coal burning and other sources of air pollution, which are poorly regulated in that nation. China suffers from severe air pollution. This is only one of many reports in 2013 that shows this: <http://phys.org/news/2013-11-china-climate-laments-severe-pollution.html>. More than 80% of Chinese cities are highly polluted according to this study: <http://www.worldwatch.org/node/3862>. Not only would Northwest coal, if exported, continue the sad legacy of poisoning the Chinese people it will also blow over on the jet stream once burned in the form of particulate matter, sometimes in a matter of days: <http://www.examiner.com/article/how-china-s-air-pollution-disaster-is-coming-to-america>.

The emissions of coal-burning plants include mercury, which transported across oceans through the atmosphere poison water and fish even here in the Northwest. Mercury cleanup is more challenging than scientists have thought: <http://www.sciencedaily.com/releases/2013/08/130805223440.htm>. Fish consumption, a very important part of the diets of many Americans, including the indigenous peoples here in the Inland Northwest show that warmer ocean water could raise mercury levels in fish: <http://www.sciencedaily.com/releases/2013/10/131003162953.htm>. Here's another similar study: <http://www.sciencedaily.com/releases/2012/12/121203150008.htm>. We also need to aggressively reduce our mercury emissions in the environment according to Harvard scientists: <http://www.sciencedaily.com/releases/2013/07/130708114518.htm>.

But those impacts may pale in comparison to the increased damage to the atmosphere that would accrue from burning the coal. There is no longer a scientific debate on the issue: **human-caused climate change is real**. We face an increasing urgency for everyone to do their part to reduce carbon dioxide (CO<sub>2</sub>) emissions. The recent fifth version of the IPCC report states that there's a 95% certainty that climate change is being caused by human induced warming. A 2013 study by Australian scientists has shown that we can't wait for certainty before we act on stopping global climate change. We need urgently, greenhouse gas reductions and here's the study: <http://www.sciencedaily.com/releases/2013/05/130528100143.htm>. Here is where the "missing heat" is: <http://www.sciencedaily.com/releases/2013/11/131113092217.htm>. And nighttime heat waves in the Pacific Northwest have quadrupled: <http://www.sciencedaily.com/releases/2013/07/130719140010.htm>. This will become worse with climate change, and heat kills more humans than cold weather.

Rising CO2 levels also cause ocean acidification. In November of 2012, Former Washington Governor Gregoire released an Executive Order initiating action on ocean acidification. The Executive Order directs the Office of the Governor and the cabinet agencies that report to the Governor to advocate for reductions in emissions of carbon dioxide at a global, national, and regional level. Global warming amplifies ocean acidification, please read this study:<http://www.sciencedaily.com/releases/2013/08/130826095846.htm>, and this one on the balance of climate change and ocean chemicals:  
<http://www.sciencedaily.com/releases/2013/09/130908135752.htm>. Please read and incorporate into your analysis this study on ocean acidification on marine species:  
<http://www.sciencedaily.com/releases/2013/08/130825171730.htm>

The state of Washington has had greenhouse gas reduction standards since 2008. I-937 was passed by the citizens of Washington to increase renewable energy and energy efficient sources. Governor Inslee recently held hearings in the state through the Climate Legislative Executive Workshop (CLEW) asking citizens for ways to continue to reduce our greenhouse gases. At the hearing in Spokane. Oct. 16, 2013 many citizens told CLEW members they did not want coal exports through the Northwest.

Climate change is believed to have already led to the increase in frequency of weather events such as Superstorm Sandy and Hurricane Katrina, and unless we urgently address the human actions that increase greenhouse gas emissions, such storms will likely further increase in frequency and intensity. Here's a study that links some 2012 weather to warming:<http://www.newsdaily.com/article/708e162b7d914c6125d840535e0279fc/>.

This letter only begins to mention all the connected and cumulative actions that relate to the proposal to construct a coal export terminal at Longview, Washington, and transport strip-mined coal from Montana and Wyoming on trains and ships throughout the Northwest. There are also currently three other coal export proposals that, with this one, would transport over 100 million tons through the Northwest. We urge the Army Corps of Engineers to conduct an area-wide Environmental Impact Statement (EIS) to assess all the cumulative and connected impact of these proposals under the National Environmental Policy Act. The following federal agencies as you are probably aware, also commented on the need for cumulative review for the Cherry Point Facility: US Department of Housing and Urban Development, National Park Service, US Fish and Wildlife service, Environmental Protection Agency, and the National Marine Fisheries Service. No doubt they will do so for Longview.

The EIS must consider potential natural resource impacts associated with the construction and expansion of all the shipping terminals along the west coast (Oregon, Washington, British Columbia and possibly California), which would not be adequately addressed through the regulatory processes for each individual terminal.

At hearings held for this proposal, we've sometimes heard it stated that requiring this EIS to address all these connected and cumulative actions and impacts would unnecessarily create a negative precedent. On the contrary, we believe that failing to do our part in recognizing how all these things are connected on a global scale would be a symptom of a vast dysfunction of human institutions, which cannot be tolerated if humans are to persist on the planet. Applicable law

allows for consideration of effects that may occur outside the U.S. From SEPA: “(A) lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries.” [Wash. Admin. Code sec. 197-11- 060(4)(b).] SEPA recognizes the world-wide scope of environmental issues. SEPA considers “each person’s” right to a “healthful environment” to be “fundamental and inalienable.” Rev. Code Wash. Sec. 43.21C.020(3) “(r)ecognize(s) the worldwide and long-range character of environmental problems” and directs agencies, “where consistent with state policy, (to) lend appropriate support to initiatives, resolutions, and programs designed to maximize international cooperation in anticipating and preventing a decline in the quality of the world environment... .” [RCW 43.21C.030(1)(f)].

The Environmental Protection Agency has recognized the materials emitted from combustion, including CO<sub>2</sub>, as pollutants which threaten human health and the environment, and has initiated CO<sub>2</sub> emissions regulation. The New Source Performance Standards state that any new coal-fired power plant in the U.S. must meet a very tight standard for low CO<sub>2</sub> emissions. A new export terminal built for the purpose of supplying coal to be burned in a manner that does not meet these new standards would undermine the entire purpose of the NSPS standards. The EPA also wants a full-coal export review: <http://www.spokesman.com/stories/2012/apr/18/epa-wants-full-coal-export-review/>.

Your agencies must broadly consider the public interest in considering this proposal, because the project must use government and public resources. The effect of greenhouse gas emissions is relevant to the public interest, because climate change and ocean acidification represent a very serious threat to our environment and the livability of our planet. And according to this study Americans support national clean energy standards: <http://www.sciencedaily.com/releases/2012/05/120513144628.htm>. And Americans think that government, including local governments, have a role in reducing global warming: <http://closup.umich.edu/files/nsee-climate-policy-options-fall-2012.pdf>.

In sum, this proposal risks harming us in countless ways. These include increasing congestion and noise with more coal train traffic, polluting our air and local waterways, harming existing businesses, delaying emergency responders, damaging aquatic ecosystems and fishing grounds at the terminal site, escalating climate change, ocean acidification, increasing tanker traffic, and creating the potential for serious shipping accidents. We urge you to consider all these impacts in the scope of the Environmental Impact Statement. We thank you for considering the large geographical impacts of the many environmental concerns of the Cherry Point Facility in the future draft EIS.

The USACE has not done its duty under NEPA in considering the larger geographic scope of impacts for the proposed Cherry Point terminal. However, we request the study of the Longview proposal include this wider geographic scope. The Council on Environmental Quality in 1997 on its guidance of NEPA analysis allowed for transboundary effects. A scoping period is the best place for this to occur and needs to be in an EIS. The EIS must include the full impacts of coal-exports from the mines in the Powder River Basin by rail through all the states and communities the trains travel to the ports, the loading, the ocean journey and the combustion of the coal at its

final destination, We also expect the EIS to have a wide range of alternatives including a fully analyzed no-action alternative.

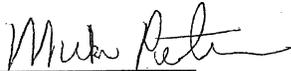
Finally, the U.S. is a signatory to the Copenhagen Climate Accord, which agrees in concept to large worldwide reductions in greenhouse gas emissions. Large new coal export schemes are clearly inconsistent with the intent of the Accord. Most of the world's coal needs to stay in the ground if greenhouse gas emissions are to be held in check, the United Nations' top climate change official said November 17th, in a speech to coal industry executives in Poland, one of the most coal-dependent nations on Earth.

Christiana Figueres, executive secretary of the United National Framework Convention on Climate Change, told industry officials here that they were putting the global climate and their shareholders at risk by failing to support the search for alternative methods of producing energy.

“Let me be clear from the outset that my joining you today is neither a tacit approval of coal use, nor is it a call for the immediate disappearance of coal,” Ms. Figueres said at an industry conference timed to coincide with the annual meeting of the United Nations climate body. “But I am here to say that coal must change rapidly and dramatically for everyone's sake.”

We hope you see the connected action between the Longview coal export terminal and its role in contributing to climate change. Thank you for considering our comments.

Sincerely,



Mike Petersen  
Executive Director  
The Lands Council  
25 W. Main Ave. Ste. 222  
Spokane, WA 99201