

Comments to Millennium Bulk Terminals EIS, re Longview Shipping Facility. Nov. 18, 2013

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

Re: Scoping Comments on Proposed Millennium Bulk Terminals—Longview Shipping
Facility Project – NEPA and SEPA

November 18, 2013

To Whom It May Concern:

I am submitting these comments via email and wish these to be considered under NEPA and SEPA. As a resident of Montana, I am very concerned the proposal to develop a coal export terminal in Longview Washington will have serious impacts on people and ecosystems special to Montana. I am also concerned about the cumulative and incremental effect on climate change that the coal-fired energy from coal mined at Powder River Basin coal will have on our environment at various scales.

The nature of the proposed coal export terminal at Longview connects actions along the route from coal mining in the Powder River Basin, to coal transport on railroads from the mine to the Longview terminal, to the terminal itself, to transoceanic transport to Asia and finally the burning of coal in poorly regulated coal-fired plants in Asia. The proposed action will have direct, indirect and cumulative effects on the communities and environment at all phases of this proposal. Cumulative and incremental effects from climate change can be even more widespread. I request that the NEPA and SEPA process employed in this analysis addresses these as connected actions and analyzes for direct, indirect, cumulative and incremental effects,

In spring of 2012 city councils of Helena, Bozeman, Billings and Missoula passed resolutions requesting the Army Corp of Engineers include each of these communities in a programmatic environmental impact statement for proposed coal ports in Washington and Oregon. The intent was the PEIS would consider the potential impacts resulting from up to 30 or more coal trains, 1.5 miles long lumbering through ours towns, cities and rural areas daily. Twice that number if they return via the same route. Several of these communities, including Livingston and Missoula reissued resolutions pertaining specifically to Longview terminal.

Citizens who came forward during city council meetings expressed concerns about potential effects on health, safety, quality of life and the economy. Please analyze the potential for the

following impacts to occur and how they will be mitigated. Be specific about affects, the economic costs and who will assume the liability and cost to mitigate.

- Diesel trains laden with coal commonly stand running for hours at a time or even overnight spewing fumes. Coal dust, diesel exhaust, and noise levels most directly affect people who live near the train tracts or switchyards. They complained about the accumulation of coal dust or diesel fumes or both on their windowsills. There is concern about letting children play in the yards.
- Due to its mountain valley location, the city of Missoula is naturally prone to inversion so the effects of air quality are exacerbated. Saint Patrick's hospital is located in the downtown area, only blocks from the railroad tracks. Please assess the cumulative effects of increased rail traffic and the coal dust on air quality in Missoula.
- I've experienced trains of up to 150 cars taking 15 minutes to pass, wondering if I should spin around and take another route, while traffic builds behind me. Each of these trains at ground levels crossings adds to the cumulative time day in and day taken from daily lives of citizens going to and from work or picking up children or running to the market. In the case of emergency response these delays may be life threatening. This is not just about crossings, but changes in traffic flow that could extend blocks in each direction around the crossings.
- Some neighborhoods are likely to see decline in property values. This decline might be most obvious in the lower income areas near the tracks, where environmental justice issues are most obvious, but can affect property values throughout the city. Studies demonstrate that communities more dependent on resource extraction suffer lower incomes than those where quality of life and more service-oriented industry are emphasized. The scale of this proposal makes all communities along the route by nature defined by resource extraction.
- In Missoula, we have made major investments to make our city more attractive to businesses and to improve our quality of life. In recent decades we have invested in our downtown infrastructure including sidewalks, street paving and crossings, lampposts, river front parks, and a footbridge that connects downtown proper with the north side, which also has seen many improvements. We constructed a new bus terminal for Mountain Line, our city bus system, and citizens recently passed a levy to expand this

service. We also have invested millions in open space in and around the city, in areas like Rattlesnake Creek and the north hills. These investments have accomplished the desired goal and brought in businesses, activities and opportunities to our beautiful city. These investments could be devalued and our quality of life diminished when the tracks cutting through our center become conveyor belts for filthy fuel.

- The citizens of Missoula have also been envisioning return of a passenger train along the southern route, a plan that would further increase the quality of life and economic vitality not only of our downtown, but our entire city and the surrounding area. The threat of incessant coal train traffic proposed would put a nail in the coffin of plans for a southern passenger route, diminishing our quality of life and economic vitality.
- Increased rail traffic could raise the cost of transport of durable goods and commodities to and from our stores and industries. A cost that consumers would have to cover in the price of the products we purchase. Likewise, businesses located or considering locating here would have to factor the additional costs, which could be a make it or break for some. Please analyze and disclose these impacts in detail.

The National Environmental Policy Act (NEPA) provides for assessing environmental, social and economic impacts of major federal actions, such as the coal ports. An EIS discloses direct, indirect, and cumulative impacts for an informed decision maker and the public, to consider. Scope of an assessment includes connected actions, such as transport of coal on trains through communities. It also provides for public involvement. For actions such as the coal ports NEPA is not discretionary.

Section 2 F of NEPA states that all agencies of the Federal Government shall: recognize the worldwide and long-range character of environmental problems and, where consistent with the foreign policy of the United States, lend appropriate support to initiatives, resolutions, and programs designed to maximize international cooperation in anticipating and preventing a decline in the quality of mankind's world environment.

This is important and pertinent to Montana. The United States Fish and Wildlife Service (FWS) has determined that habitat loss due to increasing temperatures and reduced late spring snowpack due to climate change is likely to have a significant negative population-level impact on wolverine populations in the contiguous United States. In the future, wolverine habitat is likely to be reduced to the point that the wolverine in the contiguous United States is in danger

of extinction. As a result, the FWS has proposed that the wolverine be listed as a threatened and endangered species. Areas of western Montana are prime habitat and deserve special analysis.

Glacier Park is home to an endemic population of stonefly, *Isonia Tumulana*, a species specific to the glacial waters of the Park, and is recognized as at risk from global warming. Global pollution from Powder Basin coal burned in China could very well be the death knell for these species. The EIS should address direct, indirect and cumulative impacts of coal combustion on climate change and the effect it has on these and other species including grizzlies, eagles, and other species that feed on fisheries or other food sources such as white park pine for all or part of their diets. Please also consider effect on habitat.

I am concerned about the direct, indirect, cumulative and incremental effects on climate change that the transport and combustion from energy generation of Powder Basin coal will have on our environment at all scales. This would include but not be limited to effects at the North Pacific scale on oceanic ecosystems including currents and fisheries and on indigenous populations that depend on the health and function of these systems. I consider effect on indigenous populations including in Alaska and the Arctic, an issue of environmental justice and request that you analyze climate change in this context.

In the North Cascades and Northern Rockies climate change is having a dramatic effect on the viability of glaciers. A number of our national landmarks including North Cascades National Park, Mount Rainier and other glacial hallmarks in the North Cascades, and on Glacier-Watertown International Peace Park in the Northern Rockies could be affected, Please analyze the potential direct, indirect and cumulative effects resulting from the decline or loss of glaciers.

These would include economic impacts due to decline of tourism on rural communities as well as ecologic impacts. Economic impacts due to the decline or loss of glaciers could directly affect fisheries, tourism and agriculture. Please analyze the economic effect to the people, communities and cultures dependent on cold-water fisheries, specifically but not limited to salmon, cutthroat and bull trout.

Release of glacial melt waters is particularly important. Hydrologic impacts include but are not limited to effects on regulated stream flow, on surface water temperatures, on snow pack amount, seasonal duration and snow melt regimes. Hydrologic conditions, particularly stream

temperatures and flow regimes could have a direct impact on cold water fisheries and health of microorganisms that sustain these. Please assess the effect on species dependent on cold-water fisheries such as but not limited to the grizzly, bald eagles and other species.

Agriculture is the largest industry in Montana. The transport of coal from Powder River Basin to Longview will increase rail traffic dramatically, effecting supply, i.e. the availability of rail space. Please analyze the effect coal trains will have on increased rail traffic and as a result increases to the cost of shipping by rail and indirectly on other forms of shipping, such as trucking. I am particularly interested in how the cost of commodities and durable goods I purchase will be affected by this increase in rail traffic.

I used to live in Central Washington State, which also is a major agricultural area. Central Washington is virtually a desert and agriculture is sustained waters fed from dams of the Columbia River Project, currently being renegotiated for a new Columbia River Treaty. Orchards, vineyards and farms are dependent on these waters. However, so are salmon and other threatened and endangered fisheries. Please also analyze the effect changes in stream and river flows as a result of climate change would have on agriculture, hydroelectric generation and sustainable fisheries.

Forests and the forestry industry could also be affected by climate change. In forests of the North Cascades and Northern Rockies, insects and diseases are kept under control by cleansing during extremely cold winters under which they adapted. Recent winters have seen a dramatic departure from temperature regimes in past decades. The temperatures have been too moderate to kill broods and insects have thrived under these conditions. Our forests are placed at increasing risk. Along with the browning of our forests fire severity and associated costs to fight wildfires are increased. Coal-fired power plants will contribute to these conditions. Please include analysis of the effect on climate change on forests in your assessment.

Among my other concerns are accidents and spills, affects on groundwater at mining and terminal sites, and affects of shipping on the function of the Columbia River estuary. Hopefully you will also be able to address these.

Thank you for your consideration of my comments.

Sincerely,

/Claudia Narcisco