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WA State Department
of Ecology (SWRO)

Planning Office
Cowlitz County Planning and Development 207
4th Avenue North
Kelso, Washington 98626

Re: Docket No. 2013-19738 – Scoping Comments on Millennium Bulk Terminals – Longview LLC

November 15, 2013

Dear Co-Lead Agencies:

On behalf of the members of Northern Plains Resource Council (Northern Plains) and the Western Organization of Resource Councils (WORC), we are submitting the following scoping comments to the U.S. Army Corps of Engineers (Corps), Washington Department of Ecology, and Cowlitz County in response to the August 16, 2013, Notice of Intent (NOI) to prepare an environmental impact statement (EIS) on the application from Ambre Energy and Arch Coal to build Millennium Bulk Terminals – Longview, LLC (MBTL). These comments are submitted in an effort to aid the Co-Lead Agencies in identifying issues that we believe should be addressed in the EIS. Please ensure that our comments are entered into the public record.

Northern Plains is a grassroots conservation and family agriculture non-profit organization based in Billings, Montana. Northern Plains organizes Montana citizens to protect our water quality, family farms and ranches, and unique quality of life. Northern Plains is dedicated to providing the information and tools necessary to give citizens an effective voice in decisions that affect their lives. Northern Plains is a member of WORC, a regional network of grassroots community organizations that includes 10,000 members and 35 local chapters. WORC is committed to building sustainable environmental and economic communities that balance economic growth with the health of people and stewardship of their land, water, and air resources.

Northern Plains formed in 1972 over the issue of coal strip mining and its impacts on private surface owners who own the land over federal and state mineral reserves as well as the environmental and social impacts of mining and transporting coal. Many of our members own farms and ranches in southeastern Montana, which is part of the Powder River Basin (PRB) where the coal slated for export from the West Coast is being mined and where there are proposals for development of new coal mines. Clean air and water, native soils and vegetation, and lands that remain intact are critical to our members'

livelihoods, thus, the mining of coal has significant on-the-ground impacts for our members as well as other Montanans.

The proposed rail transport of PRB coal from and through Montana would bisect and disrupt individual ranches that have existed sustainably for more than 100 years. Many more of our members and other Montanans live along and near the railroad lines that traverse our state and will be the conduits for the millions of tons of coal proposed for shipment from the PRB to the West Coast for export to Asia. Issues involved in increased rail traffic that would result if the MBTL is constructed extend beyond the confines of the current port facility and will result in important and deleterious consequences for Montanans.

The proposed project's impacts are real and significant to Montanans, and are a connected and cumulative result of what happens at MBTL. **The EIS being prepared by the Corps and the Washington Department of Ecology and Cowlitz County MUST include ALL the connected and cumulative impacts that will result if the MBTL facility is approved and constructed. These include the significant connected and cumulative impacts of the project all the way back through Montana to the PRB coal mines in Montana and Wyoming.**

Under the definition of "connected actions" found in the National Environmental Policy Act (NEPA) implementing regulations, "connected actions" are:

- those that are closely related and automatically trigger other actions that may require EISs;
- those that cannot or will not proceed unless other actions are taken previously or simultaneously; or
- those that are interdependent parts of a larger action and depend on the larger action for their justification.

Under the definition of "cumulative impacts" found in the NEPA implementing regulations, a "cumulative impact" is: "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

Increased Train Traffic Due to Coal Export

Increased coal train traffic is a connected and cumulative impact of the MBTL facility proposal that will have and cause significant consequences all the way back through Montana to the PRB coal mines in Montana and Wyoming. This increased rail traffic must be addressed, analyzed, and its consequences fully considered in the EIS being prepared.

In July 2012, WORC released a report on the significant impacts increased coal train traffic would have on the environment, communities, economics, rail traffic congestion, and public safety from the PRB to the Pacific Northwest titled, *Heavy Traffic Ahead* (see <http://www.heavytrafficahead.org/>). In WORC's soon-to-be released follow-up report, *Heavy Traffic Still Ahead*, the information in the first report will be updated and elaborated upon. This report will be forwarded to the Co-Lead Agencies upon release. The reports were prepared by Terry Whiteside (a consultant in transportation and marketing who is a former head of the Transportation Division of the Montana Dept. of Commerce and currently representing most of the Wheat and Barley Commissions throughout the western half of the U.S.), Gerald Fauth, III (a transportation consultant with extensive experience as staff advisor in transportation for the STB and an independent consultant on economic, regulatory, public policy, and legislative issues primarily associated with or related to the U.S. railroad industry), and attorney Richard Streeter (who has experience in transportation law representing regulated and unregulated carriers as well as shippers,

landowners, local communities, and state and local governmental agencies before the U.S. Department of Transportation and its multiple administrations, including the Surface Transportation Board (STB) and its predecessor, the Interstate Commerce Commission). Key findings include:

- U.S. coal export markets are headed for explosive growth. Coal export between the PRB and Pacific Northwest export terminals in Oregon, Washington, and British Columbia has almost doubled in the last year (to nearly 12 million tons) and are projected to be at nearly 100 million tons per year by 2018 and climbing to 170 million tons per year by 2023.
- While this coal export commerce would generate billions of dollars in annual revenues for railroad, coal, and port terminal companies, state and local governments would bear the brunt and burden of most of the related infrastructure costs in their localities and would likely be required to spend hundreds of millions of dollars in related mitigation, litigation, debt, and other costs associated with the necessary improvements to accommodate export coal traffic levels.
- The west-bound movement of coal is likely to disrupt the frequency and reliability of inbound and outbound shipments of containerized traffic and that traffic would likely experience diversion to California and Canadian ports.
- Export grain railroad traffic would be adversely impacted by the reduction of rail capacity and would likely experience deterioration of rail service, such as higher transit and cycle times, and would likely incur higher costs in the form of higher freight rates and equipment costs.
- Many areas along the routes would require major upgrading and expansion of existing tracks and related infrastructure, which could cost billions of dollars.
- While Burlington Northern Santa Fe (BNSF), Union Pacific (UP), and other railroads will be involved in the PRB to Pacific Northwest coal export transportation market, to some extent BNSF's routes are significantly shorter than the UP routes, and BNSF has a lower cost structure, thus, it will likely capture the lion's share of traffic and dominate the export market.
- The expected large coal volumes will result in several major choke points and bottlenecks and will likely cause rail congestion problems for the entire route, affecting Amtrak passenger service as well as other shippers.

The impacts to Montanans and Montana communities from increased coal train traffic are real and significant – and these impacts will go far beyond “inconveniences.” The MBTL facility is only one part (albeit a major part) of an overall plan by coal and rail corporations. As noted above and based on PRB coal company projections, coal export will amount to at least 75 million tons of coal and as much as 170 million tons each year through Montana.

Coal trains (today) are 120–125 cars long, and each car holds 115 tons of coal. [NOTE: Coal trains are transitioning to 150 cars in length.] At the lower level of coal exports studied in the report, Montana would likely see at least 30 more coal trains each day (15 loaded going west and 15 empty returning to the coal fields) – in addition to all the train traffic we currently experience. And, if all the West Coast ports were built or expanded and the high-end coal company projections are met, Montana could potentially experience as many as 64 more coal trains (total east and west) each day.

There will be health, safety, quality of life, as well as actual financial costs to Montana citizens and communities from this increase in coal train traffic. Billings, Montana, will be most affected by this increase in the number of coal trains as it is a bottleneck for rail traffic. All outgoing coal trains from the PRB headed for Pacific Northwest ports pass through Billings.

The increased number of trains in Montana will mean more noise, a greater potential that emergency responders will be delayed in reaching residents when there is a medical emergency (or a fire or the need for police), and a greater potential for vehicle collisions with trains and for pedestrian accidents. These issues must be addressed, analyzed, and their consequences fully considered in the EIS being prepared.

More trains in Montana will mean an increase in the amount of airborne pollutants (particulate matter) from diesel engines as well as from coal dust. Medical studies have shown a clear link between both diesel air pollutants and coal dust and disease. Additionally, more trains will mean more vehicles idling at train crossings when trains are passing – and adding their exhaust (containing particulate matter and other pollutants) into the air. While those with chronic disease, the elderly, young children, and pregnant women are most at risk, the health effects from particulate matter exposure may occur years later, so even healthy individuals need to be concerned. These issues must be addressed, analyzed, and their consequences fully considered in the EIS being prepared.

We often don't think of noise as a health issue beyond the obvious link of loud noise exposure to hearing impairment and deafness, but the medical literature also links noise to other significant human health issues, including, for example, increased blood pressure, arrhythmia, and stroke; sleep disturbance and resultant fatigue; cognitive impairment in children; and exacerbation of mental health disorders. More trains will mean more noise, especially noise from the sound of train horns that Federal law requires train engines to blow when approaching a crossing, whether that crossing has guard arms that come down or not. This issue must be addressed, analyzed, and its consequences fully considered in the EIS being prepared.

There is a process that communities can go through to establish “Quiet Zones” in order to eliminate the sound of train horns. But, the citizens of any Montana community wanting a Quiet Zone generally will have to pay for the infrastructure upgrades required that allow trains to not blow their horns. It is true that if a rail company needs to upgrade its track, a bridge, or a crossing in order to facilitate current or increased train traffic, they will do so and they will pay for it. However, if a Montana city or county wants to have a particular crossing in their community upgraded to deal with local impacts and the rail company does not need to do this in order to facilitate increased train traffic, under existing law the railroads do not have to respond to these local government concerns. The only choice Montana citizens have at that point is to pay for any upgrade with public money – taxes from somewhere be it federal, state, county, or municipality taxes. Consequently, the increased coal train traffic from the PRB mines all the way to the MBTL will directly lead to increased financial costs to Montana communities and taxpayers. These financial costs cannot be ignored and should be addressed, analyzed, and their consequences fully considered in the EIS being prepared.

If coal export “ramps up” to projected levels, other current, regional, system-wide rail traffic, including agricultural shipments, container shipments, and passenger traffic, will be adversely affected. The reports, *Heavy Traffic Ahead* and the soon-to-be-released *Heavy Traffic Still Ahead*, cited above, detail many of these impacts. As an organization that advocates for family-based agriculture, Northern Plains is especially concerned about the effects of increased coal train traffic on grain shipments, a significant Montana agricultural commodity. This issue should be addressed, analyzed, and the consequences fully considered in the EIS being prepared.

Nearly 50 Northern Plains members and other Montanans traveled to Spokane on September 25, 2013, to attend that public scoping hearing to make clear to everyone that the coal trains hauling America's energy resources to the West Coast for export to Asia do not magically appear at Spokane or even the Washington/Idaho border. These coal trains come from and through our state, and the impacts

that Montanans would experience from increased coal train traffic are significant and are the same as those that would be experienced by Washingtonians living along the rail lines and near the port facility.

Increased Coal Mining Due to Coal Export

Arch Coal owns a 38% interest in the MBTL facility. Arch Coal is the nation's second largest coal producer with active mines in Wyoming's PRB and a proposed mine in Montana's PRB.

Ambre Energy owns a 62% interest in the MBTL facility and 100% interest in the proposed Port of Morrow export terminal in Oregon. Ambre Energy currently owns a 50% interest in the Decker Mine in Montana. Cloud Peak Energy, the nation's third largest coal producer, owns the other 50% interest in the mine, but in a recent legal agreement that is not yet final, Ambre Energy is to acquire sole ownership of the Decker Mine. In exchange, Cloud Peak Energy would receive (among other things) a guaranteed amount of export tonnage capacity at MBTL.

Because the primary (or sole) reason for the MBTL facility (as well as the other proposed West Coast coal export terminals) is to ship PRB coal to Asian markets, these terminal projects will lead to a significant increase in coal mining in the PRB. Thus, increased coal mining is a connected and cumulative impact of the MBTL proposal, and these impacts should be addressed, analyzed, and their consequences fully considered in the EIS being prepared.

Proposed Otter Creek Coal Mine

The proposed Otter Creek coal mine in southeastern Montana is just one example of the connected and cumulative impact that will result if the MBTL facility is constructed. Arch Coal is the sole lease holder of the state coal resources at Otter Creek.

Today, the Otter Creek area is a rural agricultural valley. This area currently has clear air, clean water, native grasslands, valuable fish and wildlife habitat, quiet communities, productive multi-generation ranches, and abundant recreational opportunities. If fully developed, Otter Creek would become one of the largest new coal strip mines in North America. The new coal strip mine would fundamentally change the character and quality of life in this area.

The destruction of the land – often productive agricultural land – when a massive strip mine is dug is obvious. But, many do not understand that coal seams are filled with water that are critical in this arid region. These irreplaceable aquifers supply both the naturally flowing springs and the stock-watering wells that pump a limited and critical resource from the aquifer. A hydrologic consequence of strip mining is that it severs these aquifers, drying up the springs and wells. This loss of water can critically impact a ranching operation as well as wildlife of the region, and these impacts extend far beyond a mine's perimeter. In the case of the proposed Otter Creek mine proposal, groundwater model data submitted by Arch Coal to the State of Montana in its permit application predicted 70 to 80 feet of aquifer drawdown at the Custer National Forest boundary (immediately east of the mine) and 36 feet of drawdown three miles east of the forest boundary. Surface waters are also often contaminated with runoff pollution from coal strip mines.

Wildlife habitat and wildlife species of all kinds will be affected by the proposed Otter Creek mine. Construction activity, mine operation, increased human presence, increased traffic, more noise, and disruption of water resources are just a few of the many things that will change in this quiet, low population, rural agricultural area and disrupt the resident and migratory wildlife that use the area. Wildlife does not just move to adjacent areas when development occurs as that habitat is already being used; industrialization of an area often leads to wildlife population declines. Native vegetation will be affected by the proposed Otter Creek mine. Not only will native vegetation be destroyed, but construction

of any kind is notorious for spreading weeds. The Otter Creek Valley is, today, relatively free of noxious, exotic weeds. These species will spread without constant control, normally into perpetuity, and negatively impact the agricultural operations in the area. Areas of cultural importance to many different Native American tribes will be affected. The air quality of the area will be affected as active blasting releases poisonous nitrogen dioxide and dust (including coal dust) into the air and dredging releases more dust.

All of these impacts are a consequence of the MBTL facility as Otter Creek coal is destined for the export market. Arch Coal has made several statements to investors and others that the Asian export markets would be the primary market for the Otter Creek coal via proposed new coal export terminals in the Pacific Northwest, particularly the proposed MBTL facility.

Proposed Tongue River Railroad

The only way to transport Otter Creek coal to MBTL and other West Coast port terminals for export is to build the Tongue River Railroad (TRR). Northern Plains has opposed the building of this railroad since it was first proposed in the 1980s. Through the years, the TRR Company promoted many development schemes to justify building the railroad, all of which collapsed.

Today, the TRR Company is owned equally by Arch Coal, BNSF Railroad, and TRR Financing (a company controlled by Forrest E. Mars, Jr.). And, today, there is one purpose and one purpose only for the TRR – to haul Otter Creek coal. This railroad would destroy additional productive agricultural lands, bisect and devalue ranches, and industrialize the region of Montana it would cross.

It should be noted that BNSF Railroad is not only a one-third owner of the TRR, but it is also the entity that will operate the TRR if it is approved. Furthermore, BNSF will likely dominate the rail transport of export coal from the PRB to the West Coast ports via its extensive network of routes in Wyoming, Montana, Idaho, Washington, and Oregon.

West Decker Coal Mine in Montana

Earlier this year, Ambre Energy (via their subsidiary Decker Coal Company) submitted a lease modification amendment (LMA) request to the Bureau of Land Management (BLM) proposing to add another 500 acres (and nearly 41 million tons of coal) to its existing West Decker Coal Mine leases. Based on all the information reported about Ambre Energy's market plans, it is highly probable that the coal resources contained in this LMA are destined for the export market.

Northern Plains opposes Ambre Energy's LMA for a variety of reasons, however, a number of those reasons are pertinent to issues that should be included in the MBTL environmental analysis. MBTL decision makers must understand the "big picture" of a project not only in order to make a fully informed decision but also to ensure that public entities are not swindled or left "holding the bag" if a project proponent defaults. There is much about Ambre Energy's financial position and its obligations as revealed through the West Decker Coal Mine LMA application process that should be considered as part of the MBTL application and environmental analysis process.

As background, earlier this year, the Sightline Institute issued a well-documented report on Ambre Energy's financial situation (<http://daily.sightline.org/2013/02/13/ambre-energy-caveat-investor/>). In brief, the company's annual reports reveal that the Australian-based venture has never made a profit and has virtually no track record in mining or selling coal, either in the U.S. or abroad.

An in-depth look at the company's financial statements, as well as public records of other companies that have done business with Ambre Energy reveals, in part, that the company has:

- few revenues (the firm has collected only \$6.6 million in worldwide revenues in the past 7 years),
- massive losses (there is \$124 million in losses on its balance sheets),

- huge liabilities (Ambre Energy is liable for hundreds of millions of dollars for mine reclamation and site cleanup, retiree medical and pension benefits, and costs arising from a recent legal settlement),
- high borrowing costs (Ambre Energy has taken out multi-million dollar loans with annual interest rates of at least 10% and a “balloon” loan charging 12% interest), and
- massive capital needs (Ambre Energy needs to raise about \$1 billion to bring its coal export plans to fruition).

There is currently a GAO [Government Accountability Office] and a Department of the Interior (DOI) Office of Natural Resources Revenue review underway concerning the non-competitive nature of the federal coal leasing program. Mining companies are alleged to be “skirting” paying royalties on the coal that they mine by creating shell companies to which they sell the coal, and those shell companies then sell the coal to overseas markets for a much higher price. This concern is particularly salient with regard to the Decker Mine as court documents filed between Ambre Energy and Cloud Peak Energy would seem to indicate that this is Ambre Energy’s intent.

As mentioned above, Ambre Energy purchased a 50% interest in the Decker Mine in November 2011 and became the mine’s manager. Coal sales at the Decker Mine had been declining from 2007 to 2011, and, prior to Ambre Energy’s share purchase, the mine owners had planned to close the Decker Mine by the end of 2013. In July 2012, Cloud Peak Energy sued Ambre Energy alleging that Ambre Energy’s export plans for the Decker Mine were developed without Cloud Peak Energy’s approval and asking the court to remove Ambre Energy as the mine’s manager. Cloud Peak Energy also alleged that Ambre Energy has engaged in “various self-dealing transactions” designed to give Ambre Energy a “disproportionate share” of profits on Asian sales of Decker Mine coal. Northern Plains has joined a number of other groups in asking the Secretary of the Interior to halt all lease sales until the GAO and DOI reports are finalized and Congress holds hearings on this issue.

Specific to the West Decker Mine LMA application, Ambre Energy’s June 2012 Annual Report includes a note on “Contingent Liability” (Note 29), which discloses that if Ambre Energy were to default, it is under-bonded by some \$46.4 million dollars on its obligations at the Decker and Black Butte (Wyoming) coal mines. Since that time, Ambre Energy has both entered into litigation and negotiated a settlement with Cloud Peak Energy that is not yet finalized. A term of that settlement was Ambre Energy’s assumption of Cloud Peak Energy’s reclamation bonds and obligations at the Decker Mine. In light of Ambre Energy’s tenuous financial position (as revealed in the Sightline Institute report), Northern Plains has grave concerns about what would happen at the Decker Mine if Ambre Energy declared bankruptcy prior to reclamation. Northern Plains questions Ambre Energy’s motives in applying for the West Decker Mine LMA. It seems entirely plausible to us that Ambre Energy is attempting to acquire federal resources cheaply in order to inflate the assets on its books and, thus, acquire badly needed financing.

Based on all the reports and evidence, the coal resources contained in the West Decker Coal Mine LMA are destined for the export market. Consequently, the West Decker Coal Mine LMA is a connected and cumulative impact that will result if the MBTL facility is constructed, and these impacts should be addressed, analyzed, and their consequences fully considered in the EIS being prepared.

Reclamation

And, finally, despite the promise and requirements of state and federal strip mine laws, the track record of Western coal mines at achieving reclamation success as defined in our strip mine laws is dismal. The Montana Department of Environmental Quality (DEQ) must submit annual reports on all aspects of coal strip mining to the federal Office of Surface Mining (OSM). In 2011, of the 38,561 acres of land in Montana that have been strip mined only 12,412 acres or 32% have been reclaimed to a condition in

which productivity of the land is as good or better than pre-mining conditions, as required for bond release. Even more telling, only 57 acres or 0.1% have been fully reclaimed, meaning both pre-mining vegetative productivity and the hydrologic balance have been restored.

This lack of following through and reclaiming the lands and waters impacted by coal strip mining as well as all the other impacts from increased coal mining will only be exacerbated as a direct result of a coal export program that the MBTL facility promotes and should be addressed, analyzed, and fully considered in the MBTL EIS. One example that is pertinent to the MBTL issue because it involves Ambre Energy, is that company's willingness and/or ability to reclaim the Decker Mine area. The LMA states that the West Decker Coal Mine has been in operation since August 1972. An additional statement in the notice that there are "concurrent reclamation activities" at the mine is highly suspect and in stark contrast to the overall facts above submitted by DEQ to OSM.

Global Climate Issues

Finally, because the sole purpose of the Millennium Bulk Terminals – Longview facility is to facilitate the shipment of coal being transported from the PRB to its final destination in Asia where it will be burned for energy, we also believe that the EIS must give full consideration to the long-term indirect effects that this action will have on global climate. The burning of coal is a connected and cumulative impact of the Millennium Bulk Terminals – Longview facility. Although all fossil fuels contribute to climate change, coal's contribution is by far the most significant. The export of our nation's coal resources to China and other Asian nations where it will be burned will result in significant consequences for Montanans and all Americans as the greenhouse gas (GHG) emissions and pollutants are transported on global air currents back to our side of the world.

It is now well-established in the scientific community that the burning of coal and other fossil fuels is putting us on a dangerous path toward irreversible climate change. According to the *U.S. Global Change Research Report* (2009), "The global warming observed over the past 50 years is due primarily to human-induced emissions of heat-trapping gases. These emissions come from the burning of fossil fuels (coal, oil, and gas), with additional contributions from the clearing of forests and agricultural activities."

There have been a series of legal and policy developments in the past decade relating to the regulation of greenhouse gas (GHG) emissions and assessment of federal actions that may affect climate change. For example:

- The Supreme Court's decision in *Massachusetts v. EPA*, 549 U.S. 497 (2007) acknowledged the emerging scientific consensus on the dangers posed by climate change and holding that CO₂ and other GHG are "air pollutants" under the Clean Air Act subject to EPA's [Environmental Protection Agency] regulatory authority. The Court directed EPA to "decide whether greenhouse gases cause or contribute to climate change" and thereby endanger public health or welfare, which the agency did in 2009. The EPA concluded that "greenhouse gases in the atmosphere endanger the public health and welfare of current and future generations." See 74 Fed. Reg. 66,495, 66,496 (Dec. 15, 2009).
- The United States Global Research Program Report, *Global Climate Change Impacts in the United States*, documents the impacts of global climate change, including the increased likelihood of more frequent and more intense heat waves, more wildfires, degraded air quality, more heavy downpours and flooding, increased drought, greater sea level rise, more intense storms, harm to water resources, harm to agriculture, harm to wildlife and ecosystems, and ocean acidification.
- EPA adopted the nation's first carbon emission regulation establishing fuel-economy standards for mobile sources, starting with cars and light trucks.

- EPA adopted the “Tailoring Rule,” subjecting stationary sources such as coal-fired power plants to regulation of GHG emissions if they emit GHG emissions of at least 100,000 tons per year even if they do not exceed the permitting thresholds for any other pollutant.
- In 2010, the National Academy of Sciences published a report, *America’s Climate Choice*, that details the impacts already underway in the U.S., as well as policies and actions that are necessary to mitigate and adapt to climate change, including the use of existing agency authorities to reduce reliance on fossil fuels.

Virtually every ecological community and natural system in Montana is already being impacted by global climate change. These impacts will continue to become more and more severe unless the use of coal is dramatically curtailed and all nations make a concerted effort to develop other forms of energy. Wherever the PRB coal being transported is burned, the GHG emissions will eventually impact Montanans.

Within the last century, Montana has seen a 1.3°F increase in its average temperature (*Climate Change and Montana*, EPA, 1997). The Intergovernmental Panel on Climate Change has projected that, within the 21st century, temperatures will increase 4°F in the spring and summer months and 5°F in fall and winter. The increase in temperatures are:

- leading to a loss of snowpack through earlier snowmelt with resulting effects on the water supply available for humans, livestock, crops, fish, and wildlife. Snowpack in Montana holds about 75 percent of the State’s water supply. Less snowfall and earlier snowmelt affects aquifer recharge, stream flow, and stream temperature. Early snowmelt also produces an increase in stream flow in winter and spring but a reduction in summer and fall flows. This is detrimental because the summer and fall flows are critical for irrigation, power generation, fishery protection, recreation, and other uses.
- leading to extreme heat waves. In general, heat waves are already occurring at a more frequent rate, thereby increasing mortality and morbidity. EPA studies indicate that Montana is particularly susceptible to more heat waves since it already has irregular, intense heat waves as part of its weather pattern. Heat waves produce a variety of problems, including increased fatalities among the elderly and other vulnerable populations. They also increase the spread of pests and invasive species. In reference to pests, EPA has reported that mosquito populations having the potential to carry encephalitis already exist in Montana. As conditions become warmer, the habitat for disease-spreading insects and pathogens will likely expand and create a greater risk of infection for Montanans.
- increasing the danger of wildfires. Wildfires are already becoming more prevalent and destructive in Montana, especially during summer months. During the period from 2000 through 2007, three National Forests in Montana experienced a loss of over 1,420,000 acres of land due to wildfires. Moreover, in fiscal year 2008 alone, Montana spent \$84.3 million on fire and damage control. These costs to the State will only increase as global warming escalates. Wildfires also release huge quantities of CO₂ thereby creating a feedback loop that drives global warming ever higher.

Climate change is expected to have significant impacts on water supplies and the productive capacity of agricultural lands. In many parts of Montana, 2012 was the hottest and driest year on record. In Montana, agriculture is the state’s largest industry and comprises 64% of the state’s land area. In Montana, the most noticeable signals for climate change include an earlier snow melt, an earlier start to the spring growing season, a more pronounced mid-summer drought period, and more dangerous and destructive wildfire seasons.

According to Dr. Steven Running, a University of Montana climate scientist, 30 years ago snow melts occurred around the beginning of April. In recent years, they have occurred in mid-March. It is conceivable that in 30 years snow melts will occur in late February if this trend continues. The growing season currently begins a month earlier than it did 30 years ago, and summers are longer, hotter, and drier with lower river flows and more wildfires.

The burning of coal is a connected and cumulative impact of the MBTL facility proposal and must be addressed, analyzed, and its consequences fully considered in the EIS being prepared.

Health Impacts Resulting from Carbon Emissions

As an industry, coal is a significant contributor to public health problems, and the MBTL facility will serve to increase those problems by increasing the mining, transporting, and burning of coal. The National Academy of Sciences estimated in 2009 that 20,000 Americans die prematurely due to fossil fuels, and coal, by far, is the primary source of carbon emissions among the fossil fuels. It should be noted that the Academy only studied premature deaths and did not look at other non-lethal health problems cited by other studies.

A Harvard Medical School study published in 2011 cited health problems attributable to coal, such as:

- low birth weight and developmental delays (both of which can lead to more ailments in adulthood)
- stunted lung development
- kidney disease
- cardiovascular disease
- stroke
- heart disease
- lung cancer
- bronchitis
- chronic obstructive pulmonary disease (COPD)

As more coal is burned, these health problems will increase. The MBTL facility as well as the other proposed West Coast coal export terminals will directly lead to an increase in the burning of coal, and the link between increased coal burning and associated public health problems cannot be ignored and should be included, analyzed, and the consequences fully considered in the EIS.

Conclusion

Northern Plains and WORC oppose the proposed Millennium Bulk Terminals – Longview facility. The connected and cumulative impacts to Montana from the proposed MBTL facility are real and significant. The EIS being prepared by the Co-Lead Agencies for this project must address, analyze, and consider all of the connected and cumulative impacts this proposal will have on Montana. Northern Plains believe that the Co-Lead Agencies must give full consideration to the long-term direct and indirect effects that the extraction, transport, export shipment, and final combustion of PRB coal – the sole reason for the project – present as connected and cumulative impacts of the MBTL facility proposal.

If we honestly calculated the true costs of coal to the land, to our health, and to our planet, coal would not be cheap. But the significant costs of coal are shifted into the future and onto others, thus, giving coal the illusion of being cheap. As it stands, if MBTL is approved, it is the coal companies that get the profits, Asia that gets the energy, and every citizen and community from the PRB to MBTL and the other West Coast ports who will pay the costs.

These comments are submitted with the hope that the EIS prepared by the Co-Lead Agencies will bring substantive and meaningful information together about these connected and cumulative impacts so that a fully informed decision on this project can be made. Indeed, that is our expectation.

Sincerely,



Walter Archer, Chair
Northern Plains Resource Council



Norm Cimon, Chair
Western Organization of Resource Councils