



November 8, 2013

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

RE: Scoping Comments for Millennium Bulk Terminal Longview Environmental Impact Statement

Dear U.S. Army Corps of Engineers, Washington Department of Ecology and Cowlitz County:

Thank you for this opportunity to provide “scoping comments” for the draft Environmental Impact Statement (EIS) for the proposed Millennium Bulk Terminals Longview proposal. For the reasons stated below and others, we oppose this project. We respectfully request that you study a broad scope of potential impacts to the region in the draft EIS and include a Health Impact Assessment (HIA) with a public scoping process.

Millennium Bulk Terminals, Ambre Energy and Arch Coal propose to locate a 44 millionton-per-year coal export facility in Cowlitz County, Washington. This proposal would require that 16 coal trains travel through the region on a daily basis (eight full and eight empty) with 1,460 additional ships (730 full and 730 empty) on the Columbia River per year. Goods transported to and from the City of Eugene may share the same regional train tracks. Coal burned abroad yields pollution that returns to the Pacific Northwest and enters the air we breathe, the water we drink, and the food we eat. Also, our citizens spend time recreating in areas through which coal trains could pass, including the Columbia River Gorge National Scenic Area.

The Eugene City Council passed Resolution 5065 on October 24, 2012. It includes the following “Findings” that support our request:

“Coal dust contains toxic heavy metals, including mercury, arsenic, and lead; all known to have serious adverse health impacts on people of all ages, particularly children. These heavy metals, as well as emissions from the diesel-powered engines, are linked to increases in cancer, bronchitis, emphysema, black lung disease and birth defects...”

“Mercury and other toxic air pollutants produced from burning the coal in Asian nations have been shown to adversely impact the Northwest’s air, water, fish, and wildlife.”

“Exporting to, and burning coal in, Asia for electricity production will increase greenhouse gases (GHG) and hasten the adverse effects of global warming. Exporting coal to Asia will extend the period of time that Asian nations are reliant on coal, resulting in greater

worldwide GHG emissions and other air pollution. It is difficult to see how exporting coal fits into the larger strategy of moving to a lower carbon future.”

“The City of Eugene is a leader in the fight for clean air, and against climate change, by signing on to the US Mayors Climate Protection Agreement, creating our award-winning Community Climate and Energy Action Plan (CEAP), and by establishing Council goals to become carbon neutral in City-owned facilities and operations by 2020, and to reduce community-wide fossil fuel use by 50% by 2030.”

The following sections of Resolution 5065 underscore our concerns:

Section 2. Exporting coal to Asia for electricity production is inconsistent with Eugene’s efforts to reduce GHG emissions that cause climate change, move toward a lower carbon future, and to create clean energy jobs.

Section 4. We fully support Governor Kitzhaber’s request that a federal agency prepare a programmatic and comprehensive environmental impact statement (EIS) under the National Environmental Policy Act to look at the unprecedented number of coal export proposals pending in the Pacific Northwest, as well as the potential effects in this country of the use of coal in Asia. Now is the time for a programmatic EIS, before substantial and irreversible commitments of resources are made.

Section 5. The City of Eugene joins the call for review of a comprehensive independent Health Impact Assessment before any permits are approved for any proposed coal export project.

Section 6. This resolution shall be sent to Governor Kitzhaber, Senators Wyden and Merkley, Congressman DeFazio, Secretary of the Interior Salazar, Secretary of the Army McHugh, General Temple of the US Army Corp of Engineers, Director Abbey of the Bureau of Land Management, our local state legislative delegation; and the City shall lobby on its behalf where appropriate.

Your decisions regarding the scope of the draft EIS and the HIA are very significant. Again, we respectfully request that you study a broad scope of potential impacts to the region in the draft EIS and include a Health Impact Assessment with a public scoping process. We support your agency actions that will decrease risk to public health and safety, our environment and our climate.

Sincerely,

A handwritten signature in black ink that reads "Kitty Piercy". The signature is written in a cursive, slightly slanted style.

Kitty Piercy
Mayor