

WORC

Western Organization of Resource Councils

14 November 2013

U.S. Army Corps of Engineers
Seattle District Regulatory Branch
Southwest Washington Field Office
2108 Grand Boulevard
Vancouver, Washington 98661

Washington Department of Ecology
Southwest Regional Office
P.O. Box 47600
Olympia, Washington 98504-7600

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

Dear Co-Lead Agencies:

WORC is a network of grassroots organizations in seven states with 10,000 members and 35 local chapters, based in Billings, Montana. WORC's members own and operate agricultural operations, small businesses, and homes that will be affected by the mines, and the heavy rail traffic upstream from the Longview Millennium Bulk Terminal under consideration for permitting by the Army Corps of Engineers, the State of Washington, and the County of Cowlitz.

The owners of the proposed terminal are also proposing a mine and a mine expansion in southeast Montana, and own and operate mines in Wyoming. These mines represent the source of the coal for export through the proposed terminal. WORC's members experience a number of impacts as a result of coal surface mining, including increased air pollution from mines and trains and damage and loss to long time groundwater sources essential to agricultural and domestic uses in a semi-arid region.

By significantly expanding the market for these mines the proposed MBT terminal would greatly increase these damages that stem from mining.

That being said, WORC submits comments on the scope of the review, calling for the agencies to look at the rail impacts if the MBT is built and operates at its proposed full capacity.

Following are questions that should be addressed:

- What are the costs to local governments of handling greatly increased train traffic serving MBT (and cumulatively Gateway Pacific Terminal and Port of Morrow, projects already in the permitting and review process)?
- What will it cost Sheridan, Wyoming, to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Billings, Montana to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Bozeman, Montana to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Livingston, Montana to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Helena, Montana to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Missoula, Montana to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Whitefish, Montana to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Sandpoint, Idaho, to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- What will it cost Spokane, Washington, to prevent or mitigate debilitating traffic jams and congestion and public safety threats due to backed up trains in the core city?
- Who would bear the costs of added by-passes, separated grades, traffic controls, quiet zones, and other infrastructure designed to mitigate the effects of greatly increased rail traffic?
- How will the increase in coal trains and rail capacity issues affect the economic competitiveness and viability of other agricultural producers that utilize the rail system in the Pacific Northwest, including shippers of wheat, soybeans and corn in the states of Washington, Oregon, Idaho, Montana, North Dakota, South Dakota, and Iowa?

- How will the increase in coal trains affect the commercial viability of the intermodal container port of South Seattle as it competes with ports in California and Canada?
- Will the MBT exacerbate rail system capacity problems in the region, already a concern at a number of choke points throughout the Pacific Northwest BNSF rail system?
- What will addressing these capacity problems cost the BNSF and how will this affect existing shippers?
- What will be the health and property value impacts of adding dozens of trains each day through the regions communities, including some of the largest cities in Montana, Wyoming, Idaho and Washington?
- How will the increase in oil by rail from the Bakken oil field in North Dakota to PNW terminals and refineries compound the above-cited health, public safety, environmental and carrying capacity issues already stemming from the proposed Longview MBT?

In addition to the above questions that we raise for your consideration, WORC also endorses and supports the detailed scoping comments prepared and submitted by our Montana statewide affiliate, the Northern Plains Resource Council.

Yours,

A handwritten signature in black ink, appearing to read "Bob LeResche", followed by a long horizontal line extending to the right.

Bob LeResche
WORC Coal Campaign Team Chair
Sheridan, Wyoming