



King County

Larry Phillips

Councilmember, District Four

Metropolitan King County Council

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November 8, 2013

The Honorable Michael Karnofski, District 1
The Honorable Dennis Weber, District 2
The Honorable James Misner, District 3
Cowlitz County Board of Commissioners
207 4th Avenue North, Room 305
Kelso, WA 98626

Maia Bellon
Director
Washington State Dept of Ecology
PO Box 47600
Olympia, WA 98504

Brigadier General John Kem
Commander, NW Division
U.S. Army Corps of Engineers
PO Box 2870
Portland, OR 97208-2870

Dear Commissioners Karnofski, Weber, Misner; Ms. Bellon; and Commander Kem,

Thank you for the opportunity to provide public comment on the scope of the Environmental Impact Statement (EIS) regarding the proposed Millennium Bulk Terminal near Longview, a facility to be used primarily for coal export. I wish to offer the following comments and concerns.

I represent King County Council District Four, which encompasses over 200,000 residents of several northwest Seattle neighborhoods. As a result of the three new coal terminals proposed for Washington and Oregon, a large number of new coal trains would pass through my council district on their journey to export terminals. I urge you to conduct an **area-wide, cumulative impacts analysis** of all three proposals.

My council district includes the Downtown Seattle, Waterfront, Interbay, Ballard, Sunset Hill, North Beach, Blue Ridge, and Broadview. My constituents are gravely concerned about the impacts of these proposals on their health, environment, and economy, and opposition is growing.

Prominent concerns specific to the Longview proposal include the following:

- A thorough **economic analysis** should be conducted as part of the environmental review process. Such an analysis could approximate a net gain or loss of jobs, and a net gain or loss to the economy. It could take into account not only the number of permanent number of jobs created at the terminal site and the tax revenue associated with the terminal, but also job losses, damages to small businesses along the tracks, opportunity costs (such as loss of tourism revenue), and taxpayer expenses for



upgraded safety and infrastructure along the rail corridor. It is more difficult to quantify losses to quality of life and regional identity.

- Accelerated **climate change** resulting from burning coal for fuel. Coal is a dirty, carbon-intensive fuel, and exporting large quantities of it to other countries in order to develop overseas coal-based energy infrastructure—and the associated greenhouse gas emissions—will make it even more difficult to stabilize global climate change. Our state came together in 2011 to phase out the only remaining coal-fired power plant in Washington; exporting coal through our region does not match our residents' priorities and values.
- Negative impacts to the **environment at Longview**. The analysis should evaluate the impacts from coal dust and diesel pollution not only on human health at Longview, but also on the natural environment, particularly the mighty Columbia River, which is a critical natural resource for our region.

Though I recognize that full coal trains bound for Longview would not traverse my King County Council district, I understand that some empty trains leaving Longview will. This additional train traffic, in addition to the train traffic that would serve other proposed coal export terminals, cumulatively has the potential to negatively impact the residents that I represent. Concerns about local impacts in northwest Seattle include the following:

- Negative impacts on **public health** from air and water pollution from diesel engines and coal dust emanating from open rail cars. There is a potential for up to twenty coal trains a day traveling through our community, each over a mile-long, and with each car losing up to a ton of coal dust en route. Coal dust is notoriously difficult to control and the methods of containing coal dust, especially in adverse weather conditions, are unproven. Diesel particulate matter is also associated with health complications, such as pulmonary and cardiovascular issues. Furthermore, coal burned in China releases mercury into the atmosphere, which returns to the earth in precipitation. Air and ocean currents carrying mercury particulate have the potential to raise levels of mercury in our waters; mercury is associated with neurological dysfunction. The cumulative amount of air and water pollution, and resulting increases of diseases in our population, could be significant.
- **Quality of life** could be negatively impacted by noise pollution from the increase in train traffic. While there are many sources of noise from trains (high-pitched screeching, idling engines, rumbling of moving cars, etc.), horn sounding is the most significant. Federal rules governing the blowing of locomotive engine horns require that engineers of all trains sound horns for at least 15-20 seconds at 96-110 decibels at all public crossings. Decibels in the range of 80-105 are labeled extremely loud, whereas those above 105 are dangerous. Furthermore, cumulative effects of increased train vibration on landslide-prone soils may also pose risk to the rail line and adjacent private property. This increase in train noise and vibration at increased frequencies would have severe impacts on constituents living along the tracks.
- Impacts on **traffic and safety** could be significant. A single train can obstruct a rail crossing by 6 minutes or more; 20 trains would mean blocking some crossings by 2 hours per day. Access to the northern portion of the Downtown Seattle waterfront from northwest Seattle is dependent on several railroad crossing points. Pedestrian and vehicle safety must also be considered; the tracks traverse busy pedestrian corridors in my Council district, and I anticipate long waits and increased incidences of rail-pedestrian and rail-vehicle accidents.

- Chilling effects on **residential and commercial development** along the rail line. Due to increased noise, pollution, and traffic impacts from coal trains, property values in communities alongside the rail line could drop, and investments in new housing and retail could be hampered. Diverse existing businesses could also be compromised or lost in order to accommodate coal traffic. Attempts to repair the interrupted flow of commerce would likely include building over- and underpasses across the tracks. This kind of mitigation effort in itself would disrupt and displace surrounding businesses. Local businesses could be irreversibly damaged before any mitigation measures are complete.
- **Congestion on the tracks** impedes current and future freight, passenger and commuter rail service. Frequency of Amtrak and Sounder commuter rail trips are already limited by existing freight loads on the BNSF tracks. The addition of significant volumes of coal trains would appear to severely limit any expansion of freight and popular passenger rail service, or perhaps even require reductions in current service. This would hamper commerce and divert commuters and travelers from rail, resulting in more congestion and pollution on our region's roadways.
- A study by the Western Organization of Resource Councils outlines the **economic costs** associated with rail system, road and infrastructure upgrades that would be required by the coal export projects. The study indicates that these costs, added to mitigation measures, could total in the billions and would likely be borne by state and local governments. Taxpayer investment in infrastructure necessary to support and mitigate the hauling of coal along the rail line could be considered a public subsidy of a private industry, as the railroads would continue to privately own and control the railways. These costs would put an unfair burden on my constituents.

I appreciate the opportunity to pass along these initial concerns on behalf of my King County Council district, and look forward to continued involvement in this important issue that directly affects my constituents.

Thank you for considering these concerns as part of the EIS process.

Sincerely,



Larry Phillips, Councilmember
Metropolitan King County Council, District Four

cc: The Honorable Jay Inslee, Governor, State of Washington
The Honorable Peter Goldmark, Washington State Commissioner of Public Lands
Colonel Bruce Estok, Commander, U.S. Army Corps of Engineers, Seattle District
Danette Guy, Biologist/Project Manager, U.S. Army Corps of Engineers
Diane Butorac, Regional Planner, SW Regional Office, WA Dept of Ecology
Elaine Placido, Director, Cowlitz County Building and Planning
George Raifer, Special Projects Manager, Cowlitz County