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November 18, 2013

MBTL Coal Export Terminal EIS
C/O ICF International
710 Second Ave., Suite 550
Seattle, WA 98104

RE: Scoping comments on Millennium Bulk Terminals Longview Environmental Impact Statement

The Olympic Region Clean Air Agency (ORCAA) is the agency responsible for enforcing federal, state and local air pollution regulations in our six county (Thurston, Mason, Grays Harbor, Jefferson, Pacific and Clallam) region. ORCAA's scoping comments on the Millennium Bulk Terminals Longview project relate to the potential air quality impacts caused by additional trains and ships traveling through the state and increasing the carbon intensity of an already high carbon fuel. Also, the potential for air quality impacts for this project need to be evaluated in conjunction with the Gateway Pacific Terminal as it relates to cumulative air quality impacts for the state. ORCAA has the following air quality related comments which warrant further evaluation in the EIS for this project:

1. **Evaluate All Impacts to Air**

Because of potential impacts from long range transport of air pollutants, impacts to global food resources on which the U.S. relies and the fact that climate impacts are global, the EIS needs to broaden the scope of impacts evaluated. In general the EIS needs to address and quantify the impacts of the direct and indirect air pollutants and greenhouse gases emitted as a consequence of this project including emissions from ships and locomotives, fugitive dust from rail cars, emissions of idling vehicles at railroad crossings while waiting for trains related to this and the Gateway Project, and indirect emissions of air pollutants and greenhouse gases from combustion of coal that is enabled by the project. The EIS needs to address long range transport of pollutants, especially particulate, considering the state of air regulations and standards of countries where the coal will ultimately be combusted. For hazardous air pollutants, the EIS needs to focus on the consequence of heavy metal emissions from coal combustion enabled by this project and impacts to food sources due to ocean deposition of these pollutants. For greenhouse gases, the EIS needs to quantify life-cycle emission of coal combustion enabled by this project and needs to compare with alternative scenarios for the coal including the alternative of domestic use of the coal.

2. **Increased diesel particulate matter emissions from additional locomotives**

The primary pollutant of concern from trains is diesel particulate matter (DPM) which is emitted from locomotives and ships. DPM has been classified as a toxic air pollutant based upon the potential to cause cancer, premature deaths and other adverse human health effects. The EIS needs to evaluate the impacts of DPM emitted by the additional ships and locomotives that will result from this project as well as the additional ships and locomotives from the Gateway Project to evaluate cumulative impacts for the state. As stated above, consequential impacts of DPM from coal combustion enabled by this project needs to be addressed with particular focus on ocean deposition and resulting impacts to global food sources.

3. **Cumulative Effects on Air Resources from the Project and all other Past, Present and Reasonably Foreseeable Projects**

The EIS needs to thoroughly analyze the cumulative effects associated with the proposed projects by analyzing the incremental impact on the counties' air resources, including climate, all proposals that would increase train traffic and those that would increase coal combustion added to all other projects

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past, present and reasonably foreseeable in the future, regardless of who is proposing – or may propose – the other projects. Other projects need to include, but not be limited to, the proposed Gateway Project in Bellingham Washington and the other terminals under discussion including: Port of St. Helens, Port Westward, Oregon; Coos Bay, Oregon; Port of Morrow, Oregon; and Westshore, Roberts Bank, British Columbia.

Cumulative effects needs to be analyzed over the entire life of the potential project impact and not just the life of the project. The timeframe for determining which future projects to include needs to be at least as far into the future as the date by which all currently proposed or reasonably foreseeable similar projects would be operational.

4. **Incomplete Information**

We understand that there may be elements of the analyses for which perfect information is unavailable at the time. In these circumstances, the EIS needs to be based upon conservative or worst case assumptions, rather than omitting quantifying or analyzing relevant effects. See for example, WAC 197-11-080. If at the time of the analysis it is not known whether trains would pass through a particular location, more precise project information needs to be obtained. If that cannot happen, then the EIS assumes that they would pass through that location, in both directions (loaded and empty). The EIS needs to use this approach even if trains would be assumed to “be in more than one place at a time.” The alternative is to obtain more precise project information. As another example, if at the time of the analysis it is not known where project-related coal would be combusted, the EIS needs to assume it would all be combusted in one reasonable worst-case location to ensure that adequate identification and evaluation of impacts is performed in the EIS.

5. **Insignificance**

For effects determined insignificant by the EIS, the EIS needs to include a description of the relative magnitude of the effects and clearly show how the conclusion of insignificance was reached.

6. **Measures to Avoid, Minimize and Mitigate Effects of the Proposals**

Although the EIS analysis is not complete, there are specific measures and actions that would minimize or mitigate the project’s effects on air resources and climate. The EIS needs to include and evaluate these measures:

The project needs to include a binding mechanism to ensure that only the lowest-emitting locomotives are used for the increased rail and water based activities enabled by the project. These locomotives need to meet U.S. EPA Tier 4 emissions standards from 2015 on;

- The project needs to include binding mechanisms to ensure the best operational practices are used to minimize locomotive idling and emissions along the entire rail corridors used to serve the project;
- The project needs to include, or ensure, maximum installation of grade separations to minimize the effects of on road vehicle idling at rail crossings along the entire rail corridors used to serve the project;
- The project needs to include binding mechanisms to ensure the use of the best available control technology on railcars to minimize fugitive coal dust emissions, potentially including completely-covered cars if feasible; and
- The project needs to include binding mechanisms to ensure the use of the best available control technology or other means to minimize emissions from ships, in transit and at berth.
- The project needs to evaluate the cumulative impacts of air pollutants from increased ship traffic, ship idling and ship congestion along the Pacific coast, in the Straits of Juan De Fuca and in Puget Sound, as a result of this project. A global transport model needs to be used to quantify this deposition.

7. **Significant Unavoidable Adverse Impacts**

Notwithstanding the above recommended measures, this proposal would likely also result in some significant unavoidable impacts. These include:

- Combustion of the coal would – for the foreseeable future – unavoidably emit greenhouse gases and black carbon. The project would exacerbate the changing of our climate.
- Due to state and federal decision makers' inability to require emission control devices or otherwise influence the amount of air pollution from coal combustion overseas, air pollution and human health impacts would also likely be unavoidable.

8. **Alternatives**

The EIS needs to include a thorough description and analysis of each reasonable alternative, including the no action alternative. For climate impacts, alternative should be evaluated based on comparing life-cycle emissions of greenhouse gases. In addition, the EIS should include, but not be limited to, analysis of an alternative that implements the project at a time when effective control measures could be used to mitigate the negative effects on our climate.

The proposed project has drawn an enormous amount of attention, including in our jurisdiction. The project's effects would be significant and the EIS needs to include analyses of impacts, alternatives and mitigation measures as described in this letter.

Sincerely,



Francea L. McNair
Executive Director

On behalf of a majority of **The ORCAA Board of Directors**