

November 28, 2016

U.S. Army Corps of Engineers  
Regulatory Branch, CENWS-OD-RG  
Attn: Danette Guy  
2108 Grand Blvd.  
Vancouver, WA 986611

Washington Department of Ecology  
Attn: Federal Permit Coordinator  
PO Box 47600  
Olympia, WA 98504-7600

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

Subject: Millennium Bulk Terminals Longview, LLC; NWS-2010-1225. Army Corps of Engineers Draft Environmental Impacts Statement (DEIS), Department of Army permit, and Clean Water Act 401 Certification

The City of Lacey, Washington, has commented on this proposal earlier on November 6, 2013, and June 28, 2012. While I am not speaking for the whole City Council, it is clear from past comment letters that we still have significant concerns. I am asking that the Corps of Engineers opt for the No Action Option. Please deny the project's permits: Clean Water Act Section 404, and Rivers and Harbors Act Section 10.

There is no guarantee that coal, or coal dust, won't enter into waterways, including the Columbia River, but also, into other waters (lakes and streams) of the state as trains pass through and near our communities. As a city official, I have the responsibility to make sure staff follows federal and state laws which include the Clean Water Act. It will be difficult, if not impossible, to manage and abide by our NPDES permits for our lakes and streams if coal/coal dust enters from drift or train accidents.

In addition, our State is committed to reducing impacts of GHG emissions, and the impacts caused by climate change. Ask yourselves, how does this facility reduce impacts from climate change in this state? That can't be answered if this project is implemented. It also, basically, goes against the current president's initiative to address climate change. In addition, studies now show that coal is a waning industry, since natural gas is cheaper and easier to transmit. This facility is investing in a dying industry. (<http://fortune.com/2016/01/15/decline-us-coal-industry/>; <http://oilprice.com/Energy/Coal/Bankruptcies-Starting-To-Pile-Up-In-Coal-Industry.html>)

The DEIS still did not address transport of coal trains along western Washington. This is problematic in that the train tracks border our City and go past an elementary school as well as low-income housing areas. Coal dust will increase the PM 2.5 micron levels in our city and Thurston County. There is a

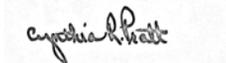
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concern that it will exceed our air quality attainment levels, violating the Clean Air Act. The county, and our city, will not be able to respond if this occurs, since the impacts will be from a pollution source that is beyond our control. This was never a factor that was considered in the analysis of the Draft EIS.

Exceptionally long train traffic, estimated at over a mile long, and increasing numbers of trains to potentially 63, will reduce first responders' abilities to respond quickly to emergencies. Fire District 3 not only has responsibility for covering our City, but also our Growth Management Area, and into Thurston County via the Yelm Highway. It is already a large area. Being stopped while a train with multiple cars, that may take longer than 10 minutes to pass, is the difference in saving a heart attack victim or letting them perish because they can't reach them in time.

Again, A No Action option is urged. In addition, please deny the Section 401 water quality certification, and Section 10 Rivers and Harbors Act permits.

Sincerely,

A handwritten signature in black ink that reads "Cynthia R. Pratt". The signature is written in a cursive style and is positioned above the typed name.

Cynthia R. Pratt  
Concerned Citizen and  
Deputy Mayor  
City of Lacey