



LAKE PEND OREILLE WATERKEEPER®

Our Lake for Life

November 28th, 2016

By Electronic Submission to United States Army Corps of Engineers:

www.millenniumbulkeiswa.gov/submit-comments.html

By Electronic Submission to Washington Department of Ecology: millenium.wqc@ecy.wa.gov

U.S. Army Corps of Engineers
2108 Grand Blvd.
Vancouver, WA 986611

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

Re: Millennium Bulk Terminals Longview, LLC; NWS-2010-1225

Thank you for considering Lake Pend Oreille Waterkeeper's comments on the Draft Environmental Impact Statement (DEIS) and Clean Water Act 401 Certification for the Millennium Bulk Terminals, Longview, LLC; NWS-2010-1225 facility. Lake Pend Oreille Waterkeeper (LPOW) is a non-profit organization located in Sandpoint, Idaho that works to protect the water quality of Lake Pend Oreille and its associated waterways so that they remain swimmable, fishable and drinkable for future generations. Lake Pend Oreille is located in Bonner County, (North) Idaho, a region that is becoming increasingly impacted by the transport of fossil fuels by rail including coal and crude oil.

Coal trains currently travel adjacent to and over Lake Pend Oreille and the Pend Oreille River in Bonner County, Idaho. Coal trains travel approximately 30 miles of Lake Pend Oreille's shoreline before passing over the point where the lake drains to the Pend Oreille River. Sandpoint, Idaho represents the "choke point" or "funnel" for all rail traffic traveling west from the coal-generating states of Montana and Wyoming. All coal trains must pass through Sandpoint and over Lake Pend Oreille on their way to existing coal export facilities on the west coast of

Canada. Sandpoint takes the brunt of all of the environmental, human health and safety and economic threats that fossil fuel by rail transport represents.

LPOW respectfully requests that the Corps support the “no action” alternative to the DEIS and deny the proposed project a Clean Water Act Section 404 permit. We also request the Washington State Department of Ecology to deny the Clean Water Action Section 401 Water Quality Certification for the proposed project.

Millennium has failed to demonstrate that it can prevent coal and coal dust from escaping moving trains, which directly compromises the water quality of Lake Pend Oreille and the Pend Oreille River. The project also weakens the Pacific Northwest’s commitment to combat the devastating impacts of climate change. Millennium’s ambitions to rebrand the Pacific Northwest as the coal export capital of the U.S. also conflicts with the public interest in clean water, clean air, clean energy, healthy communities and thriving local economies.

In addition to the points above:

- The proposed project harms our water and air quality, our health and safety and overall quality of life.
- The scope of the DEIS is insufficient. It ignores coal export’s impact on many rail-side communities, including Sandpoint.
- The DEIS acknowledges that the proposed project would result in 16 additional trains per day (8 full and 8 empty) into the project area. However, the DEIS does not acknowledge the impact of this additional train traffic on rail-side communities outside of the immediate project area, including Sandpoint. These impacts include additional traffic delays, delayed emergency response, additional noise pollution, additional air pollution, and an increased threat of derailment, which directly threatens the integrity of drinking water for thousands of residents and visitors.
- The Clark Fork/Pend Oreille watershed is home to a diverse array of terrestrial and aquatic wildlife. The DEIS is not protective of the wildlife habitat of rail-side communities, including Sandpoint.
 - Coal trains travel through the Clark Fork Delta, a highly sensitive ecosystem that is currently undergoing millions of dollars in restoration. A coal spill in this area would be both an environmental and economic disaster.
 - Sandpoint is a popular tourist destination and has been acknowledged as “the most beautiful small town in America” by USA Today and Rand McNally. A coal train derailment, with no clear emergency response solutions, would have serious economic repercussions for Sandpoint.

Again, I strongly urge that the Corps support the “no action” alternative to the DEIS and deny the proposed project a Clean Water Act Section 404 permit. Again, we also request the Washington State Department of Ecology to deny the Clean Water Action Section 401 Water Quality Certification for the proposed project.

Thank you for this opportunity to provide input on the Millennium Bulk Terminals, Longview, LLC; NWS-2010-1225 facility.

Respectfully,

A handwritten signature in cursive script that reads "Shannon J. Williamson".

Shannon Williamson, Ph.D.
Executive Director
Lake Pend Oreille Waterkeeper