

The Millennium Bulk Terminals' Draft Environmental Impact Statement (DEIS) reveals many serious impacts to human health and the environment that are intolerable and support rejection of the terminal. However, it dismisses other impacts without a valid basis, and this will require additional study and input. Particularly important is a thorough health impact analysis, which has been promised but is still unfinished.

The Coal Terminal Is a Bad Deal for Longview:

- Despite a chapter on the site's background, the DEIS completely ignores this project's sordid history. Its backers were caught lying to regulators and the public in 2011 when they claimed to only be interested in a 5 million-ton/year project. Why should anyone trust anything they say?
- The DEIS acknowledges that the rail system in Longview simply can't handle 16 additional mile-plus-long trains of coal per day. Who will pay for upgrades to the rail system? What will the impacts of those upgrades be?
- Adding those trains in Longview means over two hours of additional rail gate "down time" every day in Longview. But the DEIS masks the impacts this will have to vehicles by using highly technical "level of service" framework and 24 hour averages. What does it mean for an actual commuter during rush hour or parent trying to pick up their child at school?
- Noise from trains and whistles will exceed regulatory standards at hundreds of Longview homes. Not surprisingly, the impact on people of color and low income communities is disproportionate.
- Coal dust from open piles of coal is a huge problem in other places, yet the DEIS finds the impacts to be insignificant. Coal dust coats neighbors' homes, cars and boats, and the water quality around terminals is bad. In communities that have coal piles, companies are often unreliable in their control of coal dust, and local communities have been forced to bear the cost of cleaning up the problem, monitoring coal dust, or pursuing lawsuits to hold companies accountable. The final EIS should look harder at real world examples of coal dust pollution in terminal communities.
- The DEIS does not adequately consider the economic and reputational risks to Longview and other communities impacted by coal trains and dust. Studies elsewhere have shown real estate values to decline due to increased train traffic, and businesses will not choose to relocate to "coal towns." These impacts are significant but ignored in the DEIS.

The Coal Terminal Is a Bad Deal for Washington

- Increasing rail traffic statewide would significantly exceed system capacity on almost all segments of rail in Washington. What will the economic impacts be for other users of the system, like agriculture? Who will have to bear the costs of improving the system?
- The DEIS relies too much on the ambiguous concept of "capacity" and should look more closely at the practical impacts for people who live in communities—like traffic delay and noise—and other users of the system.
- The DEIS predicts over 11 additional rail-related accidents every year statewide, and an additional accident every year in Longview. The situation is even more grave when looked at in terms of cumulative risk including other proposed projects—the DEIS predicts 19 coal train accidents per year. Who will bear the consequences of this increased risk? Who will pay to clean things up?
- The terminal will mean 1,680 transits of massive Panamax bulk vessels in the Columbia River. But the EIS dismisses the impacts to fishing, recreation, and other values by using a model which calculates the risk of accidents as low. We need more study of the impacts of nearly five dirty coal bulkers transiting the Columbia River every day.
- Washington has spent millions recovering salmon in the Columbia River and protecting Tribal harvest. But the project will reduce access for tribal fishers and harm salmon habitat.
- Experience has shown large volumes of coal dust and chunks of coal lost from open rail cars—the "topping agents" are known to be ineffective over long distances. Yet the DEIS ignores the problem and mostly dismisses the impact of coal dust from trains.
- The cumulative impacts of this project, along with other proposed projects, are extraordinary. It would mean 76 more trains, in addition to existing traffic, every day on Washington's rail lines. It would mean thousands of

new vessel transits in the Salish Sea and Columbia River. It would vastly outstrip the capacity every component of the system to handle it safely. How this will be managed is unknown.

- People in eastern Washington already have to deal with 70 trains a day coming through their communities. The DEIS predicts as many as 200 trains per day in those communities if the coal terminal and other projects are built—that's a train every seven minutes, 24 hours a day. Since a train can take several minutes to pass, this could literally shut down rail line communities.

The Coal Terminal Is a Bad Deal for Other States

- Additional trains in Montana and Idaho would exceed system capacity. What will the economic impacts be for other users of the system, like agriculture?
- Trains from the coal mine to the terminal would go through other communities besides the ones in Washington and they too will face delays, traffic problems and pollution issues. Why aren't those problems identified in the EIS?

Exporting Coal to Asia Would Make Climate Change Even Worse

- Even if you *only* considered the rail and vessel emissions from transporting 44 million tons of coal a year, this project would be one of the biggest greenhouse gas emitters in the state of Washington. Approving this project would be contrary to clean energy and fossil fuel transition policies recently passed in Washington.
- The DEIS shows that exporting significant volumes of coal will influence coal consumption decisions, leading to estimates as high as 27 million tons/year of net additional emissions. That's equivalent to over 7 new coal fired power plants. It would increase the state's existing total GHG emissions by around 30%. This is totally unacceptable.
- There are a number of flaws and invalid assumptions in the GHG market analysis that result in significant understatement of the GHG impacts, which are likely much higher than disclosed in the DEIS.
- For example, the DEIS assumes that exporting coal will drive up domestic coal prices and reduce consumption. But few economists think that this would happen. Exported coal would come from expanded production, not reduced consumption in the U.S.
- The federal government is currently considering an overhaul of the federal leasing program, which could drastically change the economics of mining coal. The EIS should disclose and consider the potential that future federal leasing will be significantly reduced or even foreclosed.
- The DEIS claims that coal can be exported competitively to Asia, but virtually all of the available data shows that at current and anticipated future market conditions, the project is a bust. They should be required to demonstrate that this isn't another boom-and-bust project that won't leave Longview with another useless piece of infrastructure, and an even bigger mess to clean up that holds back longer term, sustainable development at this site.

Additional Resources

- www.PowerPastCoal.org
- Read the DEIS: <http://www.millenniumbulkeiswa.gov/>
- Mail written comments to: MBTL SEPA Draft EIS, c/o ICF International, 710 Second Avenue, Suite 550, Seattle, WA 98104
- Upload your substantive comments online: <https://public.commentworks.com/cwx/mbtldeiscommentform/>
- Attend a DEIS hearing!
 - Longview: Tuesday, May 24th at the Cowlitz Expo Center
1:00-9:00PM with a rally at 4:00PM
 - Spokane: Thursday, May 26th at the Spokane Convention Center
1:00-9:00PM with a rally at 4:00PM
 - Pasco: Thursday, June 2nd at the Trac Center
1:00-9:00PM with a rally at 4:00PM