

Subject **Docket number 2013-19738: Comment on scope of EIS for Millennium Bulk Terminals Longview LLC Coal Export Terminal**

From Rik Masterson <rikmasterson@hotmail.com>

To <comments@millenniumbulkeiswa.gov>

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Sep 13, 2013

US Army Corps of Engineers, Cowlitz County, Washington Department of Ecology  
WA

Dear Washington Department of Ecology,

Please accept these scoping comments for the environmental impact statement for the Millennium Bulk Terminal (MBTL) proposal for Longview, WA.

The proposal to export coal from the Powder River Basin, through the Columbia River Gorge to Longview for export to Asia would result in significant adverse effects to the local, regional, and global environment. The impacts of strip mining, transporting, and burning the coal in Asian power plants must be included in the scope of analysis for the environmental impact statement (EIS).

In particular, the proposal would have severe impacts on the Columbia River Gorge, which is the most likely rail transportation route from the Powder River Basin through the Cascade Mountains to the proposed terminal. The Columbia River Gorge is world-renowned for its natural scenic beauty, diversity in plants and wildlife, cultural resources, and recreation. To protect its outstanding resources, the Gorge is a federally designated National Scenic Area. This law requires protection and enhancement of scenic, natural, cultural, and recreation resources and air quality. The EIS must evaluate the transportation of coal by rail in open coal cars through the Gorge, and the likely expansion of tracks and siding in the Gorge that would be necessary to accommodate up to 18 additional trains per day, for consistency with the Columbia River Gorge National Scenic Area Act.

Air quality in the Columbia River Gorge is already degraded. Increased coal train traffic would worsen air quality and visibility. The human health and the environmental impacts of diesel emissions and coal dust from up to 18 trains per day must be analyzed.

Coal pollution is already a problem in the Gorge from just a few coal trains per day, with large amounts of coal polluting Gorge lands and waterways. Adverse effects of coal spilling into waterways and into sensitive plant and wildlife areas in the Gorge from open-top coal cars must be analyzed in the EIS. The threat of fugitive coal affecting agriculture and forestry must also be examined in the EIS.

Additional trains would block at-grade crossings in the Gorge, interfering with commerce, recreation, tourism, and emergency services. Wind-blown coal debris from coal trains has also been documented to be a safety threat to highway travelers. These impacts must be included in the scope of the EIS.

Existing rail traffic in the Gorge is near capacity. Approval of the MBTL project would result in the need to expand rail capacity in the Gorge with new tracks and sidings. Rail lines in the Gorge follow the Columbia River and cross many tributaries and wetlands. Impacts from

the construction of new tracks would cause adverse effects to water quality, fish, wildlife, plants, and their habitats. These impacts must be analyzed and avoided.

Train-caused fires are a regular occurrence within the Columbia Gorge, resulting in damage to native plants, sensitive wildlife habitat, and property. Increased train traffic and transporting coal in open-top cars would only worsen this existing problem. Increased risk of fire from coal trains must be analyzed in the EIS.

There are three pending proposals for coal exports in the Pacific Northwest. All would transport coal from the Powder River Basin through the Columbia River Gorge to export facilities. The combined impacts of past, present and reasonably foreseeable uses and developments must be thoroughly explored in the EIS.

Coal-burning power plants are the primary source greenhouse gases driving global climate change. The MBTL project would feed Asia's growing appetite for coal and accelerate climate change. Greenhouse gas emissions from the mining, transportation and burning of coal must be analyzed in the EIS. Coal combustion in Asia releases other air pollutants, such as mercury, that are deposited in the United States. The EIS must analyze the impacts of mercury and other toxic pollution from coal powered plants receiving coal via the proposed export facility.

The purpose and need for the proposed project should be broadened to look at economic development and environmental needs for the region and for the global climate. The range of alternatives considered in the EIS should include alternatives that better address the economic and environmental needs of the region and do not expand global reliance on fossil fuels that are responsible for causing catastrophic climate change. The alternatives analysis should include alternative transportation routes that do not pass through federally protected areas like the Columbia River Gorge. Mitigation measures should include covered rail cars to reduce the amount of coal pollution from coal trains.

The Army Corps of Engineers should refrain from making a decision on any permits until an area-wide EIS is completed to analyze the impacts of all three coal export proposals in the Pacific Northwest.

Sincerely,

Mr. Rik Masterson  
4542 NE 27th Ave  
Portland, OR 97211-6524