



May 24, 2016

Millennium Bulk Terminals -- Longview SEPA EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, Washington 98104  
U.S. Army Corps of Engineers  
Washington Department of Ecology  
Cowlitz County Commission

Subject: Docket number 2013-19738: Comments on DEIS for Millennium Bulk Terminals  
Longview LLC Coal Export Terminal

To Whom It May Concern:

Thank you for this opportunity to comment on the proposed Millennium Bulk Terminals - Longview DEIS.

FOGH (Friends of Grays Harbor) is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington's estuaries and ocean coastal environments. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment. We oppose locating any coal or other fossil fuel terminals in the State of Washington, and any expansion of such terminals elsewhere.

Coal presents a threat to human health and safety from the time it is mined to when it is burned. Washington State is a leader in clean energy and should not be approving the transport and storing of so dangerous a fossil fuel. In addition, the increase in rail traffic creates a multitude of problems for communities along the rail routes.

We find the following to be significant adverse impacts and are concerned that they were inadequately addressed in the SEPA/NEPA review process.

**Human Health and Safety:**

- Dust from the trains and the storage piles contains toxic materials and heavy metals causing human health hazards and carbon dioxide emissions. Arsenic from coal can accumulate in soils near the coal trains.
- Coal dust is highly combustible creating unacceptable and dangerous fire hazards. Powder River Basin coal can spontaneously combust.
- Dust can travel for miles and will contaminate agricultural lands along the rail route and near the terminal.
- Coal dust pollution will degrade waters near the terminals, en route from the trains, and from coal ships as they cross the Pacific Ocean.

continued on page 2

- Coal mining is a hazardous activity that produces known illnesses, injury, and death.
- Coal trains emit Nitrogen and Sulfur Oxides, which creates acid rain.
- Train derailments can occur due to accumulation of coal dust on the rails. The chance of rail collisions has the potential to increase by 22% throughout Cowlitz County and Washington.
- The coal will be shipped to Asia, where it will be burned, causing horrible health problems for the people and increasing climate change. Coal is the leading producer of carbon dioxide.
- Coal burned in Asia will cause air pollution on the U.S. West Coast.
- 5.7 million tons of coal will be exported from Longview. When burned it will release 10.3 million metric tons of carbon dioxide. If the company ships 80 million tons, as internal documents indicate, that coal would produce more than 130 million metric tons of carbon pollution, roughly equivalent to the emission from all the gasoline burned annually in Washington, Oregon, Idaho, Montana, Wyoming, Nevada, and more than half of California—combined.

**Economics:**

- Increased rail traffic will create frequently blocked crossings, which will impact all businesses along the routes.
- Increased presence of large ships in the shipping channels will impact current users and increase the risk of collisions and other mishaps.
- Local communities will bear the expense of at least 90% of the costs of rail crossing improvements. In most cases this expense will have little benefit to that community.
- Marine resource jobs will be greatly impacted by coal pollution and increased shipping traffic.
- Aquatic resources will be greatly impacted by a spill and the burning of the coal, potentially raising mercury levels and loss of habitat.
- Emergency access in the communities along the rail routes will be greatly impaired by the increased train traffic.
- Coal companies are receiving subsidies at the expense of our economy.
- Property values decrease near coal terminals.
- Coal as an international commodity is declining. The terminal will be built and ultimately lie dormant - a waste of time and money.
- Ocean acidification will only be increased as we continue to use and abuse fossil fuels. Our marine resource economy provides sustainable economic value to both tribal and non-tribal communities. Treaty rights and our coastal communities cannot be ignored by inappropriate development.

Sincerely,



Arthur (R.D.) Grunbaum  
President

