Missoula Public Health
City-County Health Department

Missoula City-County Health Department
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May 19, 2016

Dear Directors Placido and Toteff:

On May 17, 2012, the Missoula City-County Air Pollution Control Board (Board) submitted public comment to the Army Corps of Engineers regarding the numerous proposed coal export terminals in Oregon and Washington, including the Longview terminal. The Board administers matters pertaining to the Missoula City-County Air Pollution Control Program in order to require the use of all available practicable methods to reduce, prevent and control air pollution in the City and County.

Recognizing Missoula could experience significant adverse effects from the proposed operation of these terminals, the Board requested that a comprehensive programmatic environmental impact statement be conducted and include analyses of the terminals' indirect and cumulative impacts on Missoula and other Montana cities and counties. We understand this was given some consideration, as Montana is part of the study for the Longview Draft Environmental Impact Statement (DEIS). However, the document's coverage of Montana is cursory and deficient.

The Millennium Bulk Terminals-Longview (MBTL) State Environmental Policy Act DEIS mentions Montana in several contexts relating to rail use, air quality and climate change impacts. The document recognizes that many of these impacts in Montana will be serious and unavoidable.

We will address three of these impacts:

1.0 Air Quality.

The Missoula Valley lies in a bowl surrounded by hills and mountains, and experiences frequent air inversions that trap pollutants. This buildup of pollutants can result in air quality that becomes hazardous for human health - particularly sensitive groups. Missoula was designated non-attainment for PM10 upon the promulgation of the Clean

Air Act Amendments in 1990 and has not yet been removed from the list of PM10 non-attainment areas. In addition, fine particulate (PM2.5) levels in Missoula have come very close to exceeding the PM2.5 National Ambient Air Quality Standard (NAAQS). By significantly increasing the current number of trains through Missoula, an already sensitive air quality situation would be exacerbated. The DEIS finds that "increase in rail traffic would increase the emissions of criteria pollutants associated with rail transport." (Air Quality Fact Sheet, p.2)

Missoula's rail yard/switching yard bisects the downtown area, with thousands of residents living within two miles of the tracks. As acknowledged by the DEIS, inhalation cancer risks were highest in the major population centers along the rail route (Vancouver), with a cancer risk of up to 500 cancers per million. Smaller communities (Spokane, Yakima, etc.) had a risk of 300 cancers per million (Chapter 5, p. 9-10). While the exact number of additional trains the Proposed Action would bring through Missoula is not given, a doubling of the current 16.9 total trains per day would not benefit the health of residents near the rail yard

Comments: ***When will the Health Impact Assessment (HIA) be done and will we see it before the end of the comment period? The lack of a completed HIA is a serious deficiency in the DEIS.***

2.0 Rail Safety and Capacity.

Increases in coal trains without rail expansions "could result in rail traffic on some…segments exceeding capacity outside of Washington." (Summary p.30) The DEIS projects an increase of up to 16 trains per day (eight empty and eight full) traveling along Montana rail lines. All increases in rail use have the potential to increase risks of derailments and accidents across the cargo spectrum, possibly involving hazardous materials (such as crude oil). Catastrophic derailments and accidents involving hazardous cargo can affect air quality and endanger citizens' health and well-being. In addition, the City of Missoula has two at-grade crossings and two rail overpasses. Outside of the city, there are 10 additional at-grade crossings bisecting communities along the rail line. Blocked rail crossings can lead to delayed response times for emergency vehicles, increased emissions from idling vehicles and decreased ability to quickly evacuate populations during disasters such as wildfire and toxic spills.

Successful MBTL operation is contingent on successful movement of trains through Montana. The DEIS partially addresses this for Montana, stating, "Without improvements to rail infrastructure to expand capacity (and safety), the Proposed Action could result in an unavoidable and significant adverse impact on rail transportation." (Summary p. 53-54) Such improvements are not discussed specifically for Montana and Missoula County.

Comments: ***Please provide specific data regarding current and anticipated rail use and capacity through Montana. Who would be responsible for improvements? What mechanisms will insure that needed improvements are made? The lack of specificity in***

your Montana data makes it difficult to plan ahead. The DEIS must consider the cumulative impacts on the rails of all coal and oil-by-rail proposals, including the Tesoro Savage proposal.

3.0 Climate Change.

Increases in CO_2 from burning coal in Asia via the Proposed Action will contribute to climate change globally and locally. According to the DEIS, greenhouse gas emissions from the Proposed Action would exceed various national and state thresholds; the emissions would persist beyond the proposed analysis and would be considered permanent (Summary p.39). The DEIS states that mitigation measures "must achieve emission reductions that are real, permanent, enforceable, verifiable and additional. They may occur…outside of Washington State but must meet all five criteria." Emissions remaining after mitigation measures "would be significant and unavoidable, as described in Section S.7" (Summary, Table S.2, p. 58). Climate change "is global in nature"(Summary p.39), and Washington and Montana are already experiencing extreme heat and precipitation events, wildfire seasons that start earlier and end later, droughts (Chapter 5, Sec. 6.8, p.9), shorter winters with higher night-time lows, and opportunistic species (pine beetles, leafy spurge, etc.) that thrive and in some cases increase pollen counts. The Proposed Action supports infrastructure for burning coal for another 30 years and is antithetical to the December 2015 Paris agreement made by 195 nations to seriously work to reduce the threats of climate change to the planet by reducing the burning of fossil fuels.

Comments: ***The DEIS should more thoroughly examine MBTL in light of domestic and international climate goals and evaluate the proposed project in light of the social cost of carbon. In addition to climate impacts, the DEIS should examine the long-term financial viability of the proposal, given economic and energy source changes occurring both within the United States and abroad. It is imprudent to make significant infrastructure investments as markets shift away from coal.***

In conclusion, the proposed coal export terminal would create significant adverse impacts to our community, our region and the planet that cannot be mitigated. Because of these unavoidable and significant adverse impacts and because of uncertainties and missing essential information in the DEIS, we ask that you select the NO ACTION alternative. Thank you for considering our comments.

Sincerely,

Ross Miller, Chair
Missoula City-County Air Pollution Control Board