

Spokane Riverkeeper

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Clean River ♦ Healthy Community

July 25, 2017

Department of Ecology—SEA Program
Federal Project Coordinator
Post Office Box 47600
Olympia, Washington 98504

Subject: Section 401 Water Quality Certification from Millennium Bulk Terminals Longview LLC

Dear Federal Project Coordinator,

I am making comments on the Notice of Application for a 401 Certification for the Millennium coal export terminal. These comments are on behalf of the Spokane Riverkeeper, a community advocate working to protect the Spokane River from short term and long term pollution and degradation.

The Millennium Bulk coal terminal represents a long term and short term threat to the Spokane River. The export and combustion of 44 million additional tons of coal threatens the health of the Columbia River and the Spokane River and the communities that live near these rail lines and the proposed facility. Spokane, the Spokane River, and several tributaries are intersected by Burlington Northern Santa Fe and Union Pacific coal train traffic and the proposed coal terminal would increase train traffic by 8 additional loaded trains per day over these rivers.

In the short term, coal dust has been conclusively found to escape from the top of coal cars and deposit in both the Spokane River and the Columbia Rivers. Studies done by the coal industry itself have established that over 500 pounds of coal can escape cars during the course of a journey from the Powder River Basin to terminals on the West Coast. This coal dust finds its way into waterways and into the ballast that provides a foundation for the rails. This loosens the ballast and raises the risks of derailments and thus puts our river at risk from oil train traffic and other hazardous materials carried by rail. The DEIS states that coal train traffic would result in additional derailments at a rate of one accident every 2 years (DEIS at ES-6). Additionally, there are presumably risks of coal being dumped into waterways. Coal is a medium that has heavy metals and is not healthy for waterways.

The long term risks that the Millennium Bulk Coal Terminal pose are in the form of accelerating global climate change. Washington States DEIS states that the proposed project would result in 27 million tons per year net additional carbon dioxide emissions. This has a profound impact on the the snow-pack in the mountains of Idaho which is the source of our Spokane River. Global Climate change is threatening to 1) reduce the snowpack that feeds our river, 2) shorten the

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melt season so that our river is exposed to severely reduced flows at the end of the summer season, and 3) exacerbate the pumping of our ground water sources in hotter and dryer summers (thereby depriving the river of this cold clean water). The proposed millennium bulk coal terminal will only accelerate the crisis that is impending for our river and the public uses of that river.

Finally, the global combustion of coal is poisoning our water and our fish with methyl mercury. The combustion of coal in Asia has been shown contribute toxic, methyl mercury into Pacific Northwest waterways. Asia emits over 1500 tons of mercury a year and much of that is returned to our waters due to atmospheric transport. According to sources at the National Oceanic and Atmospheric Administration, mercury and other airborne contaminants collect over China during the winter and spring until Siberian winds arrive bearing dust from expanding Chinese and Mongolian deserts. Every five or six days, the winds flush out eastern China, sending dust and industrial pollutants such as ozone precursors high over the Pacific and on to our rivers where it bio-accumulates in virtually all of our fish species. We in Washington State and Spokane, currently have mercury related fish advisories for two of our species of fish and no one can eat fish without worrying about the effects of methyl mercury.

The construction of this proposed coal terminal will have lasting negative impacts on our world, our local community and our Spokane River. The costs of this rail road project in terms of environmental impacts far outweigh any short term benefits. We reiterate that the 401 Certification should be denied if the best interests of the public are to be addressed.

Respectfully,



Jerry White Jr.
Spokane Riverkeeper

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