

Washington Physicians for Social Responsibility

Washington Physicians for Social Responsibility consists of over 800 medical and health professionals throughout the state. As physicians, nurses and public health professionals, we are deeply concerned about the risks to human health and safety posed by the Millennium Bulk Terminals project. After reviewing the final SEPA EIS, and in consideration of Washington's water quality standards for surface waters, we believe this project has sufficient potential to significantly and adversely impact the Columbia River, as well as waterways across the rail route. Therefore, 401 certification should be denied.

WAC 173-201A-240 states that "toxic substances shall not be introduced above natural background levels in waters of the state which have the potential to...adversely affect public health". We know from the EIS (section 4.5) that impacts on waterways include coal entering waterways from spills (from trains, vessels, and their loading/unloading) and from airborne fugitive dust.

A 2015 study from Dr. Dan Jaffe and his group at UW-Bothell suggests that the volume of fugitive dust may be underreported. The Jaffe research group studied fugitive coal dust emissions from rail cars traveling through the Columbia Gorge. The project proposed by Millennium Bulk Terminals would bring an additional 8 loaded trains (plus 8 unloaded) through the facility daily. Though the cars will be sprayed with surfactant designed to reduce dust, Dr. Jaffe's research found that 5% of coal cars currently traveling through the region emit significantly more dust than the typical coal car. These so-called "super dusters" are not accounted for in the EIS, and could possibly add much more coal dust to area waterways than what is reported in the permit application. That increase in fugitive coal dust could push the burden in local waterways above that which is allowable under current water quality standards.

We also have concerns about the applicant's ability to capture all dust from the enormous coal pile at the port. It would be subject to winds and other weather, which could dislodge dust and toxins into the river.

That coal dust is anticipated by the EIS to include trace amounts of toxic substances known to harm human health, including beryllium, lead, and mercury. Those substances are harmful to humans whether ingested directly or through ingestion of contaminated fish and food sources; even small amounts are unsafe. Salmon in this area is a major food source for Washingtonians, and the Millennium Bulk Terminals project is expected to harm salmon spawning, rearing and harvesting all of which are designated uses of the Columbia River which must be protected by law.

Finally, a health impact assessment (HIA) would help establish a more comprehensive understanding of the health impacts this project would have, including on designated water uses. Though an HIA is underway, it has not yet been completed and thus is not incorporated into the project EIS or the 401 application. This assessment should be completed before a permit is considered, especially since the EIS has already shown an increased cancer risk for people living nearest the terminal. What other health consequences of this project have not been fully examined? We owe it to all who call Washington home to fully understand these possible impacts before determining whether this major project the largest of its kind in the nation should proceed.

In light of these concerns, and the insufficient demonstration that Millennium Bulk Terminals' mitigation efforts will keep surface waters clean and healthy, we request a denial of the 401 certification. Thank you for carefully considering our concerns, and for working to ensure a healthy

environment for our families and neighbors.

We would like to also incorporate by reference the comments submitted by Earthjustice on behalf of Columbia Riverkeeper, et al.