



January 5, 2018

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Director

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RE: County Draft Health Impact Assessment

Dr. Placido and Mr. Fazio:

Thank you for forwarding a copy of the County's Draft Health Impact Assessment (HIA). Cowlitz County and the Washington State Department of Health obviously put in a lot of hard work in a relatively short period of time to produce the draft. On behalf of Millennium, we really appreciate the County's continued efforts to move the Coal Export Terminal permits along in the process. At Millennium, we are committed to providing the community with a thorough understanding of our Project, as is evidenced by our efforts to host frequent site tours and numerous presentations to any interested members of our community.

While the Draft HIA speaks for itself, we do take issue with the deliberate mischaracterization of the information from the report that has been put out by project opponents.

- The opponents have selectively "cherry-picked" statements from the draft HIA to cause the public to believe that the report found health impacts where none exist, or where impacts already exist from existing rail and vehicular traffic.
- Specifically the opponents have ignored text surrounding the statement that would put their quoted comments into context, or would have come to a different conclusion had the entire text been read.

While no government authors can wholly prevent misuse of their materials by those with disregard for the facts, we can ask that you take appropriate measures to clarify bottom line intent and purpose in the HIA.

We have structured this letter to include the comments from the opponents, followed by our response directing the reader back to the complete text in the HIA or FEIS, and the proper characterization of the impacts and mitigation measures.

**Risks from Diesel Particulate Matter (DPM) are over-stated (as evidenced in FEIS). The project meets EPA's National Ambient Air Quality Standards that are designed to protect public health.**

1. Opponents' Comment: *"Increased cancer rates in communities near the rail line."*

MBT-Longview Response: As noted in the FEIS on page 5.6-19, the study on DPM risks *"...overstates cancer risk even for residential locations....Cancer risk is further overstated for ...commercial and industrial locations...."* The FEIS also states on page S-35, that operations would *"would not cause National Ambient Air Quality Standards to be exceeded."* The National Ambient Air Quality Standards were established by the US Environmental Protection Agency (EPA) under authority of the Clean Air Act to protect the public from air pollution. Primary standards are designed to protect public health, including sensitive populations such as asthmatics, children, and the elderly. (FEIS, Page 5.6-2)

Please see the comment letter submitted by BNSF as an exhibit during the hearing on the Shoreline Substantial Development Permit (copy attached). The EIS does not take into account that EPA tightened diesel emissions standards in 2015; or *"that EPA requires all newly manufactured and all remanufactured locomotives that were originally manufactured after 1972 to comply with increasingly stringent emission standards and to be equipped with idle reduction technology that automatically shuts down locomotives if they are left idling unnecessarily. Importantly, the EIS did not consider that idling reduction technology is required by federal law and instead assumed that all locomotives present would run continuously for any time that the locomotives were at the facility;"* Or *"As a threshold matter, the future exposures assumed by EIS are biased, wildly speculative, over-conservative, and should have been made available for study and comment. The EIS relies on the World Health Organization ("WHO") listing of diesel particulate matter as a carcinogen, which is based on studies of heavy occupational exposures to underground miners who used old or traditional diesel technology. The WHO noted that it lacked evidence to find new technology diesel (NTD) had the same effects as traditional diesel (TD). Today's North American locomotive fleets, including those that would serve this facility, use ultra-low sulfur diesel, not traditional diesel. In addition, some studies of railroad employees report that they 'did not observe any consistent increase in lung cancer risks for [railroad] shopworkers,' despite the fact that shopworkers had the highest exposures to diesel particulate matter of any class of railroad worker. See Inhal Toxicol. 2012 Jun; 24(s1): 1-45. Finally, the EIS statement attempts to predict cancer risk as a result of extremely low environmental exposures by extrapolating from controversial occupational studies, without any confirming evidence. To make this extrapolation, the EIS assumes that any exposure to diesel exhaust increases cancer risk, when no scientifically valid studies have ever identified a carcinogen that can cause cancer at any level, no matter how low."* (Shoreline Hearing, Exhibit A-30)

The Draft HIA also notes: *"It is important to remember that the health impact of any exposure depends a lot on how much you are exposed to and how long you are exposed to it for and how sensitive you are to air pollution."* (HIA, page 8)

**A key finding of the FEIS was environmental modeling found that the amount of coal dust deposited along train tracks and at the proposed terminal would not exceed air quality standards for human health.**

2. Opponents' Comments: *"Significant coal dust and diesel particulate matter (DPM) exposures that can lead to death, hospitalization from heart and lung disease, asthma attacks, pneumonia, decline in lung function, asthma in children, plus growing evidence of stroke, Type 2 diabetes, neurological and cognitive impairment, and pre-term and low-birth weight babies.(p.9)"*

MBT-Longview Response: The FEIS makes clear on page 5.7-19 that coal dust deposition would be extremely minimal. A key finding announced by the Department of Ecology was that coal dust deposition would not exceed the air quality standards for human health. *"Compliance with laws and implementation of the mitigation measures described above would reduce impacts related to coal dust. There would be no unavoidable and significant adverse environmental impacts from coal dust."* (emphasis added) (FEIS, page 5.7-30).

The sentence quoted by opponents above from the Draft HIA is a particularly misleading generalization wholly out of touch with the thorough treatment of this topic in the FEIS and in stark contrast with the key findings announced by the Department of Ecology when the FEIS was published.

**In 2011, Millennium volunteered to mitigate rail noise impacts through the use of quiet crossings for at-grade intersections near neighborhoods. The HIA does not take into account noise mitigation.**

3. Opponents' Comments: *"Higher noise exposure in low income areas in Cowlitz County. Noise is associated with higher rates of high blood pressure, heart attack and heart disease. Cowlitz County and the neighborhoods that would be most impacted by increased noise already experience higher than average rates of these diseases and that increased noise will contribute to further increase in these rates (p. 23)"*

MBT-Longview Response: The actual statement from the Draft HIA, as found on page 23, is as follows: *"Although our analysis was not conclusive it suggested that Cowlitz County and the neighborhoods that would be most impacted by the increased noise are already experiencing higher than average rates of these diseases and the research suggests that the increased noise will contribute to increasing those rates further."* The HIA report states that the analysis was not conclusive, but certainly appears to revisit a topic of the FEIS without any new information. Further the HIA does not include the proposed noise mitigation that would eliminate the need for train horns and reduce or eliminate the higher noise exposure.

**Emergency Service Providers adjust for train blockages today.**

4. Opponents' Comments: *"A single train could delay traffic by 9 minutes at at-grade crossings. There will be 16 train trips each day at full operation. This could decrease accessibility of public services and increase wait times for emergency vehicles. (p.21)"*

MBT-Longview Response: The Draft HIA clearly states that the FEIS found that project-related trains could indirectly impact accessibility (not “*would decrease*” as stated in the opponents’ comments), and that the FEIS did not assess how alternative emergency response routes could influence the potential impact. As stated in the Draft HIA, “*The FEIS concludes that the project could indirectly impact accessibility of public services, including increased wait times for emergency vehicles, if trains run at peak road traffic hours, or if infrastructure improvements are not made to Reynolds Lead and BNSF Spur. The analysis did not assess how alternative route for Fire Protection and Emergency Service vehicles or changes in dispatch could influence this potential impact.*” (HIA, page 21) The FEIS clearly addresses traffic impacts and reaches carefully drawn conclusions based on substantial study and analysis. As noted in the BNSF comment letter (Exhibit A-30 to the Shoreline Hearing), there are means to assist emergency service providers in accessing people in need. “*A new improvement to allow swift access by emergency responders to rail information is a secure mobile device application called AskRail created by BNSF and the other Class I railroads. See <https://askrail.us/>. It provides first responders immediate access to accurate real time data about individual rail cars on a train, which can help emergency responders make informed decisions about how to respond on the scene of an emergency. AskRail is available only to emergency response planners and first responders and is not for public use. It does not replace current communication channels, but is intended as a real-time supplement to the existing process.*” (Shoreline Hearing Exhibit A-30)

**The Project will provide substantial economic development and associated health benefits to the Community.**

5. Opponents’ Comments: “*Cowlitz County consistently ranks near the bottom of Washington counties in health indicators (p. 13)*”

MBT-Longview Response: The Draft HIA states in the sentence immediately preceding this quote that “*Cowlitz County has higher unemployment levels and lower incomes than the Washington State average.*” It further states: “*In many communities, economic development is a priority, and Cowlitz County is no different. The County has identified economic development and job creation as one of its top focus areas in its 2016-2020 Strategic Plan [25]. There is a level of consensus among the different agencies and jurisdictions in Cowlitz County that job growth and economic vitality are critical to the long term wellbeing of the County’s residents.*” (HIA, pages 13-14). The HIA adds: “*Personal income is a primary component of the social determinants of health. At a fundamental level, income, employment, and poverty are directly linked with health outcomes, especially for children and young adults [22]. However, a growing body of research suggests that income has less of an effect on health outcomes than previously thought. In particular, studies show that income, when combined with education, access to health services, and other “lifecourse” elements, is a more consistent actor on health outcomes than income alone.*” (HIA, page 14)

6. Opponents’ Comments: “*Cowlitz County and affected neighborhoods would be at even greater risk of health effects than other parts of Washington.(p. 15)*”

MBT-Longview Response: The HIA includes this discussion on page 11 based on the existing health conditions in Cowlitz County and affected neighborhoods. Regardless of their location, people in poor health are typically at a greater risk for health effects.

**Freshwater Shellfish collection Is illegal In the State of Washington.**

7. Opponents' Comments: *"Tribes have the right to fish and harvest seafood. Some people eating shellfish could be exposed to potentially toxic polycyclic aromatic hydrocarbons due to this project (p. 25)"*

MBT-Longview Response: This statement was "cherry-picked" from page 25 of the HIA and ignores or deletes the lead-in to the sentence that states that it is illegal to harvest or sell freshwater shellfish in Washington state. The HIA also notes, *"There is evidence that tribes used freshwater shellfish as a food source but that it was likely a famine food. A Cowlitz tribe ecologist told us that he was not aware of any tribal members harvesting freshwater shellfish today."* (HIA, page 25)

**The use of surfactants to top coal cars reduces exposure to coal dust.**

8. Opponents' Comments: *"Review of surfactants (chemicals added to the top of open train cars in an attempt to limit dust) was limited because some ingredients are proprietary or were not sufficiently identified to be reviewed independently for potential health impacts. (p. 26)"*

MBT-Longview Response: The comment ignores the other information included on toppers, specifically that *"Workers engaged in routine handling the undiluted products are cautioned or directed to wear personal protective gear to prevent irritant symptoms. We were not able to find any research or reports about these topper exposure at work causing harm."* (HIA, page 26)

*"The known polymers used in these topper agents are found in many common household products such as Elmer's glues, food paper coatings and textile coatings. In general, the known ingredients were not deemed to be a health concern for bystanders. No perfluorinated compounds or other emerging chemicals of concern were among the listed ingredients. To the extent that topper agents reduce community exposure to coal dust, the use of these toppers will be beneficial for public health."* (HIA, page 26)

**The FEIS Technical Report Life Cycle GHG Analysis concludes that the Project would result in a net reduction of worldwide Carbon Dioxide emissions.**

9. Opponents' Comments: *"44 million metric tons of coal yields about 90 million metric tons of carbon dioxide once it is used. This is roughly on par with Washington State's current total emissions in one year. (p.20)"*

MBT-Longview Response: The HIA also refers to information in the FEIS that this project would make no difference in the total amount of carbon dioxide emitted: *"The FEIS analysis also*

*assumes that, even without the proposed MBTL project, the same coal would still be transported, sold and used, albeit on a different timeline and through different ports.” (HIA, page 21)*

*As noted further on page 54 of the HIA, this estimate “included emissions from construction and operation of the facility as well as the downstream emissions of the coal that would be moved to market. To do this, the analysis examined four scenarios using different assumptions about economic and policy factors that could influence the composition of energy sources bought and sold on the energy market, and thus influence the net GHG emissions attributable to the 44 MMT of coal moving through the proposed facility each year.” (HIA, page 54)*

As the technical report prepared for the FEIS establishes, emissions associated with the MBT - Longview terminal actually produce a net reduction worldwide in greenhouse gases (GHG) when more efficient American mining practices are taken into account in a full lifecycle analysis (relative to coals currently being mined in Indonesia and elsewhere). (See Section 3.1.15 Net Greenhouse Gas Emissions of Greenhouse Gas Technical Report to FEIS)

10. Opponents’ Comments: *“Changes in Washington’s climate in the near and midterm future will likely increase hazards to human health and increase health disparities. Without preventative and protective measures, this will worsen a variety of health outcomes. “*

MBT-Longview Response: As noted in the response above, the GHG emissions from the project would represent *“a tiny fraction of global emissions”*. (HIA, page 20). On page 54, it is stated: *“While these potential emissions would contribute to GHG concentrations in the atmosphere, it would be difficult to attribute these particular emissions to a future projected degree of global warming, resulting climate effects, and resulting health effects. What is certain is that if increasing global GHG emissions from human activities continues on a business as usual path, residents in Washington and Cowlitz County will experience far greater harms than if the level of GHG emissions at the global level are dramatically reduced sufficient to arrest the increase in atmospheric GHG concentrations and limit global warming to under 2 degrees Celsius.” (HIA, page 54).*

MBT-Longview has offered voluntary mitigation for 100% of the emissions created by construction and operation of the project, and these measures were detailed in Exhibit A-29 to the Shoreline Hearing. *“To address the potential direct impacts of greenhouse gas emissions from the Proposed Action, the Applicant will prepare a greenhouse gas mitigation plan (Plan) that mitigates for 100% of the annual greenhouse gas emissions identified as Scope 1 emissions. The Plan will also document measures by other entities to regulate and mitigate for Scope 2 and Scope 3 emissions. The Plan will be consistent with the International Organization for Standardization (ISO), ISO 14064-1:2006. The ISO specifies principles and requirements for qualification and reporting of GHG emissions and removals which are consistent with the World Resources Institute and World Business Council on Sustainable Development Greenhouse Gas Protocol. The ISO and Greenhouse Gas Protocol set the global standard for how to inventory and report greenhouse gas emissions. Baseline emissions addressed in the Plan are defined in the 2015 U.S. and International Energy Policy scenario in the FEIS. The Plan must be approved by the Director of Cowlitz County Department of Building and Planning. The Plan must be*

*implemented prior to the start of full operations. The mitigation measures under the control of MBT-Longview described in the Plan may include a range of mitigation options. The measures must achieve emission reductions that are real, permanent, enforceable, verifiable and additional. Eligible mitigation measures may include but are not limited to funding per Washington Energy Facility Site Evaluation Council (EFSEC) policy; purchases and/or permanent protection of conservation lands or wetlands offering critical habitat, carbon storage, or ecosystem values and benefits; funding for purchases of government-recognized carbon offsets on carbon markets; research supporting development of carbon sequestration technologies or renewable technology development. Mitigation payments shall be based on annual throughput for the prior year, payable within three months after the end of each year.” (Shoreline Hearing Exhibit A-29)*

As I said in my introduction, while no government authors can wholly prevent misuse of their materials by those with disregard for the facts, we can ask that you take appropriate measures to clarify bottom line intent and purpose in the HIA. Ultimately, we believe we can have responsible economic development in the community, that economic development is good for the health of the community, and that the FEIS concludes that the project will meet all State and Federal standards that are protective of people and the environment.

Thank you for consideration of our comments.

Sincerely,



**Kristin Gaines**  
Vice President  
Environmental Planning and Services