

Millennium Final Environmental Impact Statement - Preliminary Summary of Findings

Why the FEIS's Findings of Multiple Significant, Unavoidable Impacts Matter

The FEIS is used to decide whether to issue or deny permits to Millennium. The multiple findings of **significant, adverse impacts that cannot be mitigated** mean that Ecology and Cowlitz County should deny Millennium's permit applications. Any other outcome would be scientifically and legally unsupported.

Key FEIS Findings

Mitigation Cannot Eliminate Significant Adverse Impacts

- The FEIS found **"unavoidable and significant adverse environmental impacts"** for **nine environmental resource areas**: social and community resources; cultural resources; tribal resources; rail transportation; rail safety; vehicle transportation; vessel transportation; noise and vibration; and air quality.

Greenhouse Gas Emissions

- Simply operating this terminal would have the GHG equivalent of adding 8,300 cars to the road every year.
- The FEIS concludes that the GHG impact of exporting 44 million tons of coal varies significantly based on different assumptions but suggests that under the "preferred scenario," the impact would be just under 2 million tons of CO₂ equivalent annually. This amount is very significant (equivalent to adding **425,000 cars to the road annually**) and far above the thresholds of what should be considered acceptable at a time when the state is committed to reducing carbon pollution. Under some scenarios, emissions could be as high as **55 million tons of GHG**, substantially higher than **Washington state's entire GHG footprint from all sources**.

Public Health

- A Health Impact Assessment (HIA) is underway and, in turn, the FEIS does not incorporate the HIA findings. Even without the HIA, Ecology and Cowlitz County conclude that the project's impacts on public health are "unavoidable and significant." S-58.
- Increased Cancer Risk for People Living Near Terminal: "Based on the inhalation-only health risk assessment, diesel particulate matter emissions primarily from Proposed Action-related train locomotives traveling along the Reynolds Lead, BNSF Spur, and BNSF main line in Cowlitz County would result in areas of increased cancer risk. The maximum modeled cancer risk increase in the City of Longview would be **50 cancers per million in the Highlands neighborhood, a low-income and minority community**. This impact would constitute a **disproportionately high and adverse** effect on minority and low-income populations and would be unavoidable and significant." S-14.
- "Based on an inhalation-only health risk assessment, coal export terminal operations and Proposed Action-related trains would **increase the cancer risk** associated with diesel particulate matter emissions." S-35.
- Noise: "If the Federal Railroad Administration does not approve a Quiet Zone [near the terminal], the impacts would be unavoidable and significant." S-14.

Impacts to Tribes and Tribal Fishing

- Unavoidable Impacts: The FEIS concludes that coal trains would travel through usual and accustomed fishing areas and could restrict access to tribal fishing areas in the Columbia River. The FEIS does not address the significance of impacts related to treaty rights. S-42, S-48.
- Activities related to Millennium's project "could reduce the number of [Columbia River] fish surviving to adulthood, which could affect the number of fish available for harvest by the tribes."
- The FEIS acknowledges the project's impacts on access to tribal fishing sites along the rail route, noting "[p]roposed Action-related trains also **could delay tribal fishers' access** to these unmapped traditional fishing locations." S-17.

Rail Traffic Impacts

- Traffic delays for public and emergency response: "If no improvements are made to reduce vehicle delay at these crossings, this disproportionately high and adverse effect **on minority and low-income populations** would be unavoidable and significant." S-14.
- "In a 24-hour period, trains for the Proposed Action would increase the probability of emergency response vehicles being delayed by 10% at crossings along the Reynolds Lead and BNSF Spur with current track infrastructure." S-32.
- Other Rail Traffic: "Proposed Action-related trains could result in an **unavoidable and significant adverse impact on rail transportation ... and rail safety.**" S-30-31.

Safety and Accidents

- The project would result in a **27% increase in vessel traffic** in the Columbia River (massive coal bulkers would transit through the Columbia River 1,680 times per year, nearly 5 times a day), increasing the risk of accidents and consequent environmental risks. S-33. Oil spill risks during refueling would also increase.
- The addition of 18 unit trains carrying coal each day would increase the risk of rail accidents by 22% in the County and statewide. S-31.
- If a vessel accident occurred, "the impacts could be **significant**, depending on the nature and location of the incident, the weather conditions at the time, and the discharge of oil. Although the likelihood of a serious Proposed Action-related vessel incident is very low, **there are no mitigation measures that could completely eliminate the possibility of an incident or the resulting impacts.**" S-43.

Other Notable Information

- FEIS Recognizes Need for Future Washington Department of Natural Resources (DNR) Approvals: "The project area landowner (Northwest Alloys) holds a 30-year aquatic lands lease (20-B09222) with the Washington State Department of Natural Resources (WDNR). According to WDNR, under the terms of the lease, **Northwest Alloys must obtain WDNR's written consent** prior to construction of improvements. Northwest Alloys has not yet requested and WDNR has not provided its consent to the improvements proposed by the Applicant (Palazzi pers. comm.)." S-44, n. 10. In January 2017, DNR denied a critical authorization for Millennium to operate at the site by denying consent to a sublease for Millennium to use the bed and banks of the Columbia River. Millennium sued DNR; the lawsuit is pending in Cowlitz County Superior Court.