

# NORTH PORTLAND NEIGHBORHOOD SERVICES

North Portland Neighborhood Chairs Network 2209 N. Schofield Street Portland Oregon 97217 info@npnsccommunity.org

*Coal Train and Barge Resolution  
North Portland Neighborhood Chairs Network  
July 12, 2012*

**Whereas** the proposed coal trains and barges will likely travel through our North Portland neighborhoods and the safety of those trains and barges has not been proven.

**Be it resolved**, that we request that a comprehensive Health Impact Assessment (to include cumulative effects), a programmatic Environmental Impact Statement and a transportation impact analysis be completed and examined before any coal export facility, infrastructure or related transport is approved by any Oregon, regional or federal agency.

Chris Duffy, Chair, Arbor Lodge Neighborhood Association  
Leslie Sawyer, Co-Chair, Bridgeton Neighborhood Association  
Angela Moos, Vice-Chair, Kenton Neighborhood Association  
Andrew De Veux, Chair, Friends of Cathedral Park Neighborhood Association  
Sarah Whitefield, Chair, East Columbia Neighborhood Association  
Ron Schmidt, Chair, Hayden Island Neighborhood Network  
Alan Cranna, Chair, Overlook Neighborhood Association  
Shaun Sullens, Chair, Piedmont Neighborhood Association  
Sam Thompson, Chair, Portsmouth Neighborhood Association  
Babs Adamski, Chair, St Johns Neighborhood Association  
Tom Karwaki, Chair, University Park Neighborhood Association



April 25, 2012

JOHN A. KITZHABER, MD  
Governor

The Honorable John McHugh  
Secretary of the Army  
1400 Defense Pentagon  
Washington, D.C. 20301-1400

The Honorable Ken Salazar  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street, NW, Room 5665  
Washington, D.C. 20240

Major General Merdith W.B. (Bo) Temple  
Headquarters  
U.S. Army Corps of Engineers  
441 G Street NW  
Washington, D.C. 20314-1000

Mr. Robert Abbey, Director  
Bureau of Land Management  
U.S. Department of the Interior  
1849 C Street, NW, Room 5665  
Washington, D.C. 20240

Dear Sirs:

On behalf of the people of Oregon, I am writing to request that a federal agency prepare a programmatic and comprehensive environmental impact statement (EIS) under the National Environmental Policy Act to look at the unprecedented number of coal export proposals pending in the Pacific Northwest, as well as the potential effects in this country of the use of this coal in Asia. Currently, the United States annually exports between 80 and 100 million tons of coal from all ports in the United States. The current proposals for coal export facilities in Oregon and Washington could result in an *additional 157 million tons* of coal exports, more than doubling the U.S. coal export capacity.

Most of the environmental, community, economic, transportation, and energy security impacts associated with this tremendous increase in coal export would be shouldered by Oregon and Washington. In addition, the United States has the largest proven coal reserves in the world. Developing, transporting and using this resource for energy production in Asia will have significant implications for the trajectory of the world's transition to cleaner sources of energy and for our nation's energy security, as well as localized economic and environmental effects in our state. It is imperative that the federal government take seriously its responsibility to make informed decisions, and that there be a comprehensive look at the energy, environmental, and public health impacts of these proposals before the nation commits itself to this path.

Both the Army Corps of Engineers (Corps) and the Bureau of Land Management (BLM) have the responsibility to look at these impacts because both agencies are making decisions that will result in significant impacts that have not been analyzed. Previously, the Oregon Department of Environmental Quality (ODEQ) asked the BLM to prepare a supplemental EIS for the ongoing coal leasing and development activities on BLM lands in the Powder River Basin in Wyoming and Montana. Our prior request for a supplemental EIS was based on the fact the EIS that BLM

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prepared for its coal leasing program analyzed the environmental effects of transporting the coal to the mid-western and eastern United States, for domestic energy production. The BLM did not evaluate the effects of transporting substantial amounts of coal from the Powder River basin to the West Coast for export to overseas markets. BLM Director Abbey denied Oregon DEQ's request for a supplemental EIS on the grounds that the proposals for coal export through the west coast were too indefinite at that time. That lack of certainty has now changed, with several specific proposals now pending regulatory reviews, and others having secured initial property agreements. Now is the time for a programmatic EIS, before substantial and irreversible commitments of resources are made to this path.

The impacts from the transport of coal through Oregon and its communities would be significant. Areas of concern that merit a hard look, at a minimum, include:

- Increased vessel traffic on the Columbia River, including navigational and maritime safety concerns
- Protection of water quality, including increased risk of spills
- Impacts to listed anadromous fish species
- Coal dust emissions at the facilities and during product transport
- Emissions of other air pollutants, including diesel particulate, ozone, mercury, and greenhouse gases and
- Increased rail traffic, noise, and delay times for communities along the proposed rail lines, including emergency vehicles at rail crossings

I have already heard from many of our citizens and elected officials who are deeply concerned about the impacts of increased coal train traffic running through their communities. I share their concerns. This magnitude of coal moving through the region's rail system would represent a substantial increase in train traffic -- perhaps as many as 63 coal trains per day. The trains will travel through communities that have been identified as "choke points" along the line. This could significantly affect the transport of other export commodities and negatively impact plans to increase passenger rail. I am particularly concerned about a substantial increase in rail traffic through the Columbia Gorge National Scenic Area, where train noise, air emissions and coal dust could adversely affect the recreational and visual values protected by federal law.

The proposals could also cause significant vessel traffic impacts on the Columbia River. The Columbia River is a confined system, and the proposals could result in a 70% increase in ship traffic. The Columbia River has multiple ports, a breaking coastal bar at the entrance, and no federal vessel traffic system, all of which create significant potential for risk. Vessel traffic impacts from the proposals could be significant, and need to be analyzed.

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Another major concern, and one not addressed by the prior BLM EIS for the Wright Area coal leases, is the impacts of increased or extended use of coal to generate electricity in Asia. Coal-fired energy production in Asia has been directly linked to increases in air pollution on the west coast of the United States. Studies that 84 percent of the mercury in the Columbia River basin is due to atmospheric deposition from global sources and 18 percent of mercury deposition recorded at one Oregon site can be traced to anthropogenic sources in Asia. Over the long term, these transported emissions could lead to economic as well as environmental and health impacts in our states, triggering additional costs in emissions controls for U.S. industries. The air quality impacts of the use of Powder River coal in Asia must be explored in the context of a comprehensive federal EIS.

Greenhouse gas emissions from the transport and combustion of coal are also a major concern. Two years ago, the Secretary of the Interior issued Order No. 3289, Amendment No. 1 (Feb. 22, 2010), which requires each bureau of the Department to consider and analyze potential climate change impacts when making major decisions regarding potential use of resources under the Department's purview. *See also* CEQ Draft NEPA Guidance on consideration of the Effects of Climate Change and Greenhouse Gas Emissions (Feb. 18, 2010). Oregon faces particular threats from climate change, including the reduction in the amount of precipitation falling as snow and the resulting effects on water supplies and fish and wildlife as well as power production from hydroelectric dams, more frequent and intense storm surges, more flooding, likely loss of land in coastal area, more frequent and severe forest fires and increased forest pests and diseases, and detrimental impacts to shellfish fisheries as a result of ocean acidification. As noted above, the United States has the largest proven coal reserves in the world. Developing that resource for energy production in Asia will extend the period of time that Asian nations are reliant on coal, resulting in greater worldwide emissions of greenhouse gases (and conventional air pollutants, as noted above). The impacts of United States coal exports on climate change are an issue of national concern that merits a hard look by a federal agency.

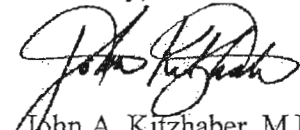
If the United States is going to embark on the large-scale export of coal to Asia it is imperative that we ask -- and answer -- the question of how such actions fit with the larger strategy of moving to a lower carbon future. In the absence of a clear federal policy on this point, we will simply be deciding by not deciding; locking ourselves into a coal-dependent future for Asia without the benefit of a full discussion, consideration and balancing of all the associated economic, environmental and health problems related to such a course of action. The decision must also be made only after we have full information about the short and long-term consequences. This critical step will fill significant information gaps that will benefit our nation, our states, and our communities. Since federal agencies will be making decisions whether to allow these projects to go forward, and because the impacts of the projects cross state boundaries, it is the responsibility of a federal agency to step up and do this analysis.

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I strongly urge an immediate commitment to evaluating the impacts of these projects through a comprehensive, programmatic Environmental Impact Statement that examines both the cumulative effects of coal transport to the West Coast, and the effects of the use of that coal to produce energy in Asia here in the United States. The EIS must be prepared before regulatory or additional coal leasing decisions are made. Thank you. I look forward to your response.

Sincerely,



John A. Kitzhaber, M.D.  
Governor

cc: Ray LaHood  
Nancy Sutley  
Joseph Szabo  
Jack Lew  
Steve Gagnon (re NWP-2012-56)

**Position Statement on Coal Exports from  
Concerned Oregon Physicians to Governor Kitzhaber  
July 19, 2012**

Multinational coal companies propose to send coal mined in the Powder River Basin by rail and barge through the Pacific Northwest to be loaded onto large ships and exported to Asia. If current proposals are approved, that could result in more than 150 million tons of coal shipped each year. An average of 26 loaded coal trains, each one-mile long (or longer) with over 100 cars propelled by four diesel engines, could pass through Oregon and/or Washington every day. This will result in the release of significant amounts of airborne pollutants and related disease from diesel engines and coal dust. The increased train traffic will also cause significant delays at many rail crossings, increased risk of vehicle and pedestrian injuries along the tracks, and increased noise pollution. As a group of Oregon physicians, we are deeply concerned about the health and safety impacts these proposals.

A group of Washington physicians has carefully reviewed data published in peer-reviewed medical journals which show that:

Diesel particulate matter is associated with: (See *Appendix A, Appendix C*)

- impaired pulmonary development in adolescents;
- increased cardiopulmonary mortality and all-cause mortality;
- measurable pulmonary inflammation;
- increased severity and frequency of asthma attacks, ER visits, and hospital admissions in children;
- increased rates of myocardial infarction (heart attack) in adults; and
- increased risk of ischemic stroke.

Coal dust is associated with: (See *Appendix B*)

- chronic bronchitis;
- emphysema;
- pulmonary fibrosis (pneumoconiosis); and
- environmental contamination through the leaching of toxic heavy metals.

Noise exposure causes: (See *Appendix D*)

- cardiovascular disease, including increased blood pressure, arrhythmia,
- stroke, and ischemic heart disease;
- cognitive impairment in children;
- sleep disturbance and resultant fatigue, hypertension, arrhythmia, and increased rate of accidents and injuries; and
- exacerbation of mental health disorders such as depression, stress and anxiety, and psychosis.

Frequent long trains at rail crossings will mean: (See *Appendix E*)

- delayed emergency medical service response times; and

- increased accidents, traumatic injury and death.

More recent research published in major medical journals augments prior concerns including, but not limited to: (See *Appendix F*)

- increased risk of lung cancer.

Additionally, several recent studies have shown that powerful spring trade winds can carry Asian pollution into the atmosphere above North America. Some of the imported pollution descends to the surface, where it affects ground-level concentrations of ozone, mercury, sulfur compounds and soot. Ground-level ozone can cause severe respiratory problems, including asthma, in susceptible individuals.

A 2008 study (see *Appendix G*) found that Asian emissions of mercury contribute 18% of springtime mercury concentrations at Mount Bachelor. Snowpack runoff ends up in our rivers and lakes where the mercury contaminates the fish we eat. Pregnant women and children are particularly vulnerable to the toxic effects of mercury. Mercury is a potent neurotoxin that can damage developing brains in fetuses and children.

The effects of air pollution are not hypothetical, but real and measurable. Many of the reviewed studies show significant health effects of exposure to everyday airborne pollutant levels that are below national U.S. Environment Protection Agency (EPA) guidelines. The data show a linear effect with no specific "safe threshold."

The conclusion that airborne pollutants pose a significant and measurable health risk was also reached by the American Lung Association, in their review, "State of the Air 2011," and by the American Heart Association, in their 2011 review, "Particulate Matter Air Pollution and Cardiovascular Disease."

As physicians, we believe the risks to human health from massive coal shipments across our state, down the Columbia River, and through our communities are significant. We are particularly concerned with the health of our most vulnerable populations: prenatal, early childhood, the elderly and those with pre-existing conditions. We must identify likely exposures for affected workers and individuals all along the line, from the mines to the trains, to the barges, and to the ports of the Northwest. We want to prevent new sources of morbidity and mortality. We seek your help in doing so.

Specifically, we request that you call for and examine both a comprehensive Health Impact Assessment (to include cumulative effects) and a programmatic Environmental Impact Statement before any coal export facility, infrastructure or related transport is approved by any Oregon state agency.

With respect,

A. Sonia Buist, MD, PhD  
Jonathan Betlinski, MD  
Jon A. Blackman, MD  
Nathan K. Boddie, MD, MS  
Harriet Cooke, MD, MPH  
Thomas G. Cooney, MD  
Nancy Crumpacker, MD  
Rhett Cummings, MD  
Maggie Bennington-Davis, MD  
Mary Ellen Coulter, MD  
Linda De Sitter, MD  
Maxine Dexter, MD  
Stone Doggett, MD  
Martin Donohoe, MD  
Lucy M. Douglass, MD  
Patrick Dunn, MD  
Grace Dunsmore, MD  
Catherine Ellison, MD  
Frank Erickson, MD  
George Feldman, MD  
Virginia Feldman, MD  
Larry G. Fickenscher, MD  
Bruce Free, DO



Nick Gideonse, MD  
Bradford J. Glavan, MD  
Marshall Goldberg, MD, MPH  
Charles Grossman, MD  
Keith Harcourt, MD  
Andrew Harris, MD  
William K. Harris, MD  
Arthur D. Hayward, MD  
Ron Heintz, MD  
William S. Herz, MD  
John Howieson, MD  
Linda Humphrey, MD  
Lyn Jacobs, MD  
Lawrence Jacobson, MD  
Paul Kaplan, MD  
Susan Katz, MD  
Joel Kay, MD  
Steve Kohl, MD  
Jay D. Kravitz, MD, MPH  
Rod Krehbiel, MD  
Michael Lefor, MD  
Louis Libby, MD  
Holger Link, MD  
Cat Livingston, MD, MPH

Rebecca MacGregor, MD  
Janet Madill, MD  
Marissa Maier, MD  
Jack McAnulty, MD  
Robert A. McFarlane, MD  
James Metcalfe, MD  
Susan Mikkelson, MD  
Craig Miller, MD  
Mizuho Mimoto, MD  
Marwan Mouammar, MD  
John Muench, MD, MPH  
Richard A. Mularski, MD  
Phil Newman, MD  
Paul Norman, MD  
William Nunley, MD, MPH  
Melissa Nyendak, MD, MHS  
Philip Paden, MD  
James R. Patterson, MD  
John Partridge, MD  
John Pearson, MD  
Carolyn Polansky, MD  
David A. Pollack, MD  
Jenny Pompilio MD, MPH  
J. Powell, MD

Martin Raitiere, MD  
Bonnie Reagan, MD  
Peter Reagan, MD  
Jonathan A. Rettman, MD  
James B. Reuler, MD  
Vincent P. Reyes, MD  
Eric Richards, MD  
Robert H. Richardson, MD  
Constance Rosson, MD  
David Ruud, MD  
Irene Saikevych, MD  
Anne Sammis, MD  
Thomas Schaumberg, MD  
Christine Schjelderup-Free, MD  
James P. Scott, MD  
John F. Schilke, MD  
Jerry M. Slepach, MD  
Sharon Smith, MD  
Praseeda R. Sridharan, MD  
Elizabeth Steiner, MD  
Karen Steingart, MD, MPH  
Tom Stibolt, MD  
Frances Storrs, MD  
Renee Stronglamill, MD

Richard U'Ren, MD  
Andrew J. Uri, MD  
Thomas T. Ward, MD  
Lanier Williams, MD  
William H. Wilson, MD  
C. Todd Woolley, MD  
Douglas Walta, MD  
Philip Wu, MD  
Maureen Becker, ND, LAc  
Audrey Bergsma, ND  
Alicia Bigelow, ND  
Meghan Brinson, ND  
Patrick Chapman, ND  
Joe Coletto, ND, LAc  
John Collins, ND  
Stephanie Kaplan, ND  
Jeanette Lyons, ND  
Patricia Murphy, ND, LAc  
Patricia J. Meyer, ND  
David Naimon, ND  
Bonnie Neilnu, ND  
Peggy Rollo, ND, LAc  
Alison Schulz, ND  
Rene Schwartz, ND

Igor Schwartzman, ND

Robert Sklovsky, Pharm.D., ND

Drew Scott, ND

Mary Scott, ND, LAc

Lisa Shaver, ND

Eric F. Stephens, DAOM, LAc

Patricia Timberlake, LCSW, ND

Laura Torgerson, ND

Nigel David Adler, DC, LAc

Laura Baffes, DC

Cathy Cummins, DC

Hari Dass Khalsa, DC

**Key References:**

*American Heart Association statement*

*American Lung Association statement*

*Puget Sound Clear Air Agency document*

**Appendices:**

*Download Appendix A: Pulmonary Impacts of Airborne Pollutants (including diesel particulate matter) (PDF, 152 KB)*

*Download Appendix B: Health Impacts of Coal Dust (PDF, 94 KB)*

*Download Appendix C: Cardiovascular Impacts of Airborne Pollutants (including particulate matter) (PDF, 86 KB)*

*Download Appendix D: Health Impacts of Noise Pollution (PDF, 94 KB)*

*Download Appendix E: Anticipated Impacts of Frequent Long Trains on Emergency Medical Service Response Times and Risk of Injuries at Crossings (PDF, 82 KB)*

*Download Appendix F: March 12, 2012 Letter from Whatcom, Skagit and King County Physicians (PDF, 304 KB)*

*Download Appendix G: "Trans-Pacific Transport of Mercury" (PDF)*

## United States Senate

WASHINGTON, DC 20510

COMMITTEES:  
ENVIRONMENT AND  
PUBLIC WORKS  
HEALTH, EDUCATION,  
LABOR, AND PENSIONS  
BANKING, HOUSING,  
AND URBAN AFFAIRS  
BUDGET

July 18, 2012

The Honorable John McHugh  
Secretary of the Army  
1400 Defense Pentagon  
Washington, D.C. 20301-1400

The Honorable Ken Salazar  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street, NW, Room 5665  
Washington, D.C. 20240

Dear Secretary McHugh and Secretary Salazar,

I have been talking with Oregonians in town hall meetings across the state, and have heard a great deal of input about the proposed coal export facilities in Oregon and Washington. These comments reflect a broad spectrum of opinions and some deep differences of opinion within and among communities that would be affected. Like many of the Oregonians I have heard from, I am supportive of efforts to increase exports of American products, especially through Oregon's ports. I recognize and appreciate that these projects would create much-needed jobs and economic development for local communities. Yet I also recognize and appreciate that many Oregonians have serious concerns relating to local and global impacts of these projects.

I am, therefore, writing to request that the Army Corps and the Bureau of Land Management conduct a comprehensive, expedited programmatic Environmental Impact Statement (EIS) for the proposed coal export facilities in Oregon and Washington.

The proposed export projects are a major undertaking but there has been significant uncertainty about the proposed facilities and communities are divided about the benefits and consequences of exporting coal. For that reason, I believe it is imperative that we do all we can to ensure there is full public disclosure of information about, and analysis of, the proposed facilities. A programmatic EIS would help put more information before the public and enable more comprehensive and informed public discourse. At the same time, the programmatic EIS should be conducted on the fastest timeline possible, preferably within one year, so as to not unnecessarily delay the decision-making process.

Some local communities see significant economic development opportunities and jobs in the potential coal export facilities. The potential benefits include the construction of coal transport infrastructure, jobs on trains and barges and at ports, and improvements to our region's rail and shipping infrastructure. In addition, it is likely that additional jobs for manufacturing and

operating barges would be created in Oregon. Permanent, family-wage jobs would be created through preliminary labor agreements between unions and the companies proposing the exports. At a time when we need to be doing everything possible to promote economic development and get Oregonians back to work, the proposals could have benefits for our state.

Some local communities have also expressed deep concerns about the impact of the proposed facilities. These include the impact of coal dust on public health or on local businesses, and the effects of increased rail congestion. Some residents have described their worry that small towns could essentially be divided in half by very lengthy coal trains for long periods of time.


Many people are concerned about larger-scale impacts. Conservation organizations have expressed concern that the proposed projects would offer developing Asian economies a significant new source of coal that they would otherwise not be able to access. They assert that this access, and the resulting effect on coal prices and demand, could change the fundamental economics of coal in Asia, increasing dependence on coal and slowing growth in the use of cleaner energy sources. Some are also concerned that further dependence on coal in Asia will lead the amount exported from the U.S. to increase significantly in the future. These developments could have a significant impact on climate change.

A programmatic EIS, or any type of EIS the Army Corps conducts, must be comprehensive in nature, and consider both local and global issues raised by the public. Relatively localized issues to be studied should include potential impacts on public health from coal dust and diesel pollution; effects on water quality; effects on listed species such as Chinook Salmon and steelhead in the Columbia and Willamette rivers; effects on other critical habitat and aquatic resources; effects on cultural resources and historic sites; and the effects of mining activity on public lands. In addition, the EIS should assess the impacts of increased vessel traffic on the Columbia River, including effects on navigational and maritime safety concerns; and the impacts of increased rail traffic, including noise and traffic delays for events such as emergency vehicles at rail crossings.

Global impacts of coal exports to be studied must include effects on climate change (including cumulative additions to global greenhouse gas emissions), global energy markets, energy security, and the clean energy economy. The changing climate is already altering our environment, and will have particularly significant negative impacts on our state, including sea level rise, ocean acidification, and an increase in the frequency and intensity of extreme weather events like storms, floods, and summer droughts.

These issues are complex and have major implications. They raise questions about whether global environmental and energy policy should be decided based on project-by-project applications or whether other policy forums should be engaged. A programmatic EIS would be one step toward ensuring more comprehensive analysis and informed decision-making. We should not make public policy decisions that could constitute significant moves toward a more coal-dependent future without gathering and publicly disclosing the best possible information and engaging in the appropriate analysis. I support an expedited programmatic EIS for that reason: it would enable a full and thorough examination of the issues to best inform public policy decisions for Oregon and for the nation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeffrey A. Merkley". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent and the last name "Merkley" following in a similar style. The signature is written over a horizontal line.

Jeffrey A. Merkley  
United States Senator

Cc:

The Honorable Nancy Sutley  
Chair, Council on Environmental Quality  
Executive Office of the President  
Washington, DC 20500

Major General Merdith W.B. (Bo) Temple  
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Mr. Robert Abbey, Director  
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