

## **Review of Millennium Bulk Terminals—Longview Draft SEPA EIS**

by Richard Thomas

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The first issue that I see with the state's draft EIS is the assumption that coal is going to continue to be in demand in the future. According to the EIS, on page 4, "The Applicant states further development of western US coalfields and the growth of Asian market demand for US coal is expected to continue, and existing West Coast terminals are unavailable to support this need (WDOE, 2016)." Seven months ago, Asian demand for coal was decreasing. The price of coal recently surged, because China cut its own production, and they cut production because they are trying to get away from coal as a fuel source—because it's dirty. Additionally, with concerns over climate change, one shouldn't be so certain that coal is going to retain its value over the next 50 years. When the last of the glaciers have completely disappeared, fossil fuels are going to become really unpopular.

The second issue that I see with the state's draft EIS is the assumption that coal, and coal dust, are going to remain inert in the environment. According to the EIS, on page 28, "Unburnt coal can be a source of acidity, salinity, trace metals, hydrocarbons, and potentially macronutrients if they leach from the coal matrix into aquatic habitats. However, the contaminants tend to be bound to the matrix of the coal and are not readily leached when exposed to water. The contaminants would be in a form that aquatic organisms would not absorb and the impacts are not likely to be significant (WDOE, 2016)." Polychlorinated Biphenyls (PCBs) are also relatively inert substances that were once considered safe, but we now know that they persist in the environment, bioaccumulate, and cause a number of health problems in humans and other organisms. Point being, it should never be assumed that putting something into

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the environment that isn't there already will do no harm. One can say that coal has been found to be relatively inert in laboratory settings, but one can not say that coal will remain inert in the environment. What chemical reactions will occur in soil, wetlands, or the Columbia river are largely unknowable. And, the Columbia river is not simply water; it's water mixed with agricultural & industrial chemicals—some of which we don't even know are there. The Columbia river is a chemical soup, and who knows how it will react to fresh lumps of coal.

This project will have many consequences for the surrounding community and the environment, some of which will undoubtedly be unforeseen consequences. There is no guarantee that coal will retain its value. The additional railroad traffic is bound to translate into road traffic, which is a drain on our economy, and the facility will only employ a mere 135 individuals. This project is full of costs to the surrounding community, with very little economic gain in return. In my opinion, this project should not be approved.

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