

November 28, 2016

Submitted via US Mail

Millennium Bulk Terminals NEPA Draft EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle WA 98104

RE: Comments on NEPA Draft EIS for proposed Millennium Bulk Terminals coal export terminal at Longview, Washington

Dear U.S. Army Corps of Engineers, Seattle District ,NEPA Lead Agency:

Thank you for this opportunity to submit comments on the NEPA Draft Environmental Impact Statement (DEIS) for the proposed Millennium Bulk Terminals coal export terminal project (MBT).

I am a resident of the San Juan Islands, concerned about preserving and protecting my beautiful home from the potentially harmful effects from this proposed coal export terminal.

Even though we are nearly 300 miles away (as the orca swims) from the proposed terminal's site, our islands and their residents face direct, indirect and induced damage to the health of our environment due to the project's increased shipping traffic, with its accompanying underwater noise, air and water pollution, increased risk of a fuel/cargo spill and potential impacts to federally listed threatened and endangered fish, wildlife and marine mammals under the U.S. Endangered Species Act. San Juan County's marine environment/economy also stands to suffer from the project-related contributions to greenhouse gas emissions and resulting ocean acidification.

THE MILLENNIUM BULK TERMINALS COAL EXPORT TERMINAL THREATENS THE ECONOMY OF THE SAN JUAN ISLANDS

People come to the San Juan Islands from all over the world to enjoy the natural environment and to see birds and marine life. The San Juan Islands' economy is inseparably linked to the beauty of our environment and the health of our marine ecosystems. Many islanders depend upon a healthy and sustainable salmon fishery and Orca population. Tourism is the primary economy in San Juan County and our resident Orca whales are the prime driver of that economy.

San Juan County's current economic bread and butter are visitors, retirees, and part-time residents who have vacation homes in the islands. With a boost from the designations of "#1 Island in the U.S." by Trip Advisor, " #2 in the New York Times' Best Places to Visit," "#3 on Lonely Planet's "Top 10 Destinations for 2013'", and National Monument status, the San Juan Islands are now a major tourist destination. San Juan County's visitors and part-time residents provide significant state and local tax revenues. ¹ In 2012, more than 700,000 people visited our islands and spent nearly \$158 million.² In the same year, 1,850 jobs here were directly related to the travel industry.³ During August 2015, the peak travel month, the total number of non-agricultural jobs — direct (due to tourism), indirect and induced — in San Juan County was 6,550.⁴

UPPER COLUMBIA RIVER AND SNAKE RIVER CHINOOK SALMON ARE ESSENTIAL FOR THE SURVIVAL OF SAN JUAN COUNTY'S ORCA WHALES

The Southern Resident Killer Whales (SRKW), also known as the orca whale, is San Juan County's icon. As noted above, our tourism-driven economy is dependent on these charismatic marine mammals. The birth rate of the

¹ San Juan County collected \$884,314 and the Town of Friday Harbor collected \$298,830 in lodging taxes in 2012. Treasurer, Town of Friday Harbor; San Juan County Treasurer's Office.

² San Juan Islands Visitors Bureau, <http://www.visitsanjuans.com>

³ Dean Runyan Associates "Washington State Travel Impacts and Visitor Volume, 2002-2012."

⁴ Washington State Employment Security Department, Labor Area Summaries, <https://fortress.wa.gov/esd/employmentdata/reports-publications/regional-reports/labor-area-summaries>.

SRKW is strongly correlated with the abundance of Chinook salmon. New information shows that abundant runs of Columbia and Snake River Chinook salmon are important to the long-term survival of the SRKW.⁵

Since the Southern Resident Killer Whale was listed as Endangered under the Endangered Species Act in 2005, the National Oceanic and Atmospheric Administration (NOAA) has funded studies of SRKWs to better understand how they can be protected. A key part of this effort is defining Critical Habitats that are essential for their traveling, foraging, resting, and reproduction. It is well established that SRKWs spend much of the summer near the San Juan and Canadian Gulf Islands, but winter sightings had been rare until a NOAA-funded project tracked the winter travels (2012 to 2015) of both the K and L pods of Southern Resident Killer Whales along the outer coast from the Strait of San Juan de Fuca to Northern California, spending much of their time around the mouth of the Columbia River. Because Chinook salmon is the preferred food of the SRKW, they were likely feasting on upper Columbia and Snake River Chinook salmon that were transiting these waters at the time.

Juvenile Chinook salmon use the lower Columbia River for migration and sustenance. Adult salmon must migrate along the Columbia River past the site of the proposed coal terminal. Impacts associated with the proposed terminal – its construction and its operations – including fuel spills from vessels visiting the terminal, are potential threats to maintaining Chinook salmon runs adequate to sustain the Southern Resident Killer Whale population. Therefore, I request that the final EIS for the proposed MBT project include a study of impacts to our San Juan County economy based on the impacts to the SRKW from the project's direct impacts to this key salmon population.

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https://www.nwfsc.noaa.gov/research/divisions/cb/ecosystem/marinemammal/satellite_tagging/index.cfm

Please address the following impacts to salmon, orca whales, and San Juan County in the final EIS for the MBT project:

Based on the adverse impacts outlined in the Draft EIS for the MBT project, including the adverse impacts from the increased risk of oil spills, to endangered Columbia Chinook salmon, an essential food for the Southern Resident Killer Whales, in the Columbia River...

- What is the economic threat from the loss of the SRKW population to the economy of San Juan County in Washington State?
- What would be the loss of property values in San Juan County and what would be the loss of tourism and real estate sales from depleted fish and wildlife populations, such as the SRKW, in the event of a major oil spill in the Columbia River?

In analyzing each and all of the above impacts...

- What would a “worst case scenario” look like in the presence of each of the plausible, compounding factors or events, including but not limited to human errors, storms, earthquakes, tsunamis, and other planned/proposed projects that may contribute to increased cumulative impacts and chance of accidents?
- What would be the estimated damages in dollars, overall and for San Juan County in particular, if such a “worst case” event were to happen? Will the MBT project have sufficient insurance coverage to insure against the “worst case” damages and economic losses?

CLIMATE CHANGE AND CLIMATE IMPACTS MUST BE CONSIDERED

The “Guidance on Considering Climate Change in Environmental Reviews” was issued by the Council on Environmental Quality in August 2016 to “assist Federal agencies in their consideration of the effects of greenhouse gas (GHG) emissions and climate change when evaluating proposed Federal actions in accordance with the National Environmental Policy Act (NEPA).

Focused and effective consideration of climate change in NEPA reviews will allow agencies to improve the quality of their decisions. Identifying important interactions between a changing climate and the environmental impacts from a proposed action can help Federal agencies and other decision

makers identify practicable opportunities to reduce GHG emissions, improve environmental outcomes, and contribute to safeguarding communities and their infrastructure against the effects of extreme weather events and other climate-related impacts.”⁶

Please address the following project-related contributions to climate change and its impacts to San Juan County in the final EIS for the MBT project:

The MBT DEIS fails to address the project’s overall contribution to climate change and its effects on the citizens of Longview and Washington State. As a citizen of the state, and of San Juan County in particular, I am concerned about the climate-related impacts to our community. We would like to be safeguarded from the effects that this project threatens. Therefore, I ask that you please include the following climate change related impacts to San Juan County in the Final EIS:

Ocean Acidification

The burning of coal releases carbon dioxide into our oceans and contributes to ocean acidification. Ocean acidification poses grave risks to San Juan County's marine species and ecosystems. Based on the tonnage of coal proposed to be exported and subsequently burned, what would be the impacts of increased ocean acidification in the waters of San Juan County? What would be the costs of the increased ocean acidification's impacts on recreational and commercial shellfish and the wildlife that feed on shellfish? What would be the impacts to the pteropods that comprise much of the diet of juvenile Chinook salmon? Since Chinook salmon are the preferred diet of the endangered Southern Resident Killer Whales, and as their food supply declines SRKW numbers will inevitably decline as well, what would be the economic costs to San Juan County from the adverse impacts of ocean acidification to Southern Resident Killer Whales?

Extreme Weather Events

The burning of coal releases carbon dioxide that contributes to global climate change. Based on the tonnage of coal proposed to be exported and subsequently burned, what would be the impacts of the acceleration of climate change to San Juan County? What would be the costs from associated increased storm winds,

⁶ https://www.whitehouse.gov/sites/whitehouse.gov/files/documents/nepa_final_ghg_guidance.pdf

ocean surges, and precipitation? What would be the impacts due to sea level rise? What would be the costs associated with sea level rise? What would be the costs associated with more intense storms coinciding with the highest "King Tides?"

Mercury Pollution

The burning of coal releases mercury. Based on the tonnage of coal proposed to be exported and subsequently burned, what amount of mercury will be released and what amount of that mercury will increase the mercury content of San Juan County seafood and the people and wildlife that feed upon that seafood? Prevailing winds send mercury that is burned in Asia back towards the U. S. Pacific Northwest. What would be the impacts of the increased mercury pollution? How would the increased mercury pollution impact fish consumption rates? What would be the costs associated with the increased mercury pollution? What would be the impacts on the health and reproduction of the Southern Resident Killer Whales?

Thank you for your serious consideration of these issues in the final EIS for the MBT project.

Sincerely,

A handwritten signature in cursive script that reads "Shaun Hubbard".

Ms. Shaun Hubbard
PO Box 805
Friday Harbor WA 98250
shaunalice@gmail.com