

May 13, 2016

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Longview SEPA EIS  
c/o ICF International  
710 Second Avenue, Suite 550,  
Seattle, WA 98104

Dear Elaine Placido, Sally Toteff and ICF International:

**RE: Millennium Bulk Terminals—Longview Coal Export Facility DEIS**

Thank you for the opportunity to comment on your draft environmental impact statement for the proposed Longview Coal Export Facility at Millennium Bulk Terminals.

I commend you on an impact statement on a fossil fuel export facility that includes an assessment of greenhouse gas impacts from the product exported. In that regard a much more complete assessment of impacts was included than has to date appeared in other EISs on fossil fuel export facilities planned for the Northwest. There are still serious questions on cumulative impacts from this proposal alone and in conjunction with other fossil fuel export facilities planned for our state.

**Public and Tribal Resource Impacts**

The Lower Columbia is an estuary of National Significance with very high resource value for fish and wildlife with high diversity from mudflats, eelgrass to tidal surge plains. Tidal influences flows upstream to Bonneville. The majority of Columbia Basin salmon and steelhead stocks are listed under the ESA. The salmonids provide important tribal commercial and sports fisheries. To protect stocks Oregon and Washington have sports/commercial fish net pen rearing in Lower Columbia River and Off-Channel Areas in Oregon and Washington.

Your document states accurately: "Tribal Resources Activities related to the Proposed Action would cause physical or behavioral responses in fish or affect aquatic habitat in the Columbia River. These impacts could reduce the number of fish surviving to adulthood and returning to areas upstream of Bonneville Dam, thereby affecting the number of fish available for harvest by the tribes. But because of

other on-going impacts to the resource you conclude that quantifying impacts is difficult and “Making a determination of significance related to treaty reserved rights related to traditional fishing sites on the Columbia River is not determined in this SEPA Draft EIS.” Yet this is a key question that needs to be answered.

RE: Fish resource: When you have an at-risk resource guaranteed by treaty and also in public ownership, how many cumulative cuts or reductions to that resource leads to extinction of those resources? This proposal adds impacts to those fish resources from ballast waters, spills, dredging, prop wash and with increased shipping activity, water quality impacts into rail ditches and surface water from rail lines. The magnitude of this project is large and risk to resources from operation and accident is increased.

### **Consistency with International Climate Needs and Efforts**

Your Final EIS should identify conflicts with national and international needs and goals to transition off fossil fuels to totally renewable energy resources. It should also include an alternative assessment such as exporting solar, wind or tidal energy generation would compare with that in terms of meeting urgent needs to reduce climate impacts. SEPA legislation stresses need to support international efforts. See: SEPA Legislation RCW 43.21C.030 (Guidelines for state agencies, local governments—Statements—Reports—Advice—Information) states: “*(f) Recognize the worldwide and long-range character of environmental problems and, where consistent with state policy, lend appropriate support to initiatives, resolutions, and programs designed to maximize international cooperation in anticipating and preventing a decline in the quality of the world environment;*”.

How does this coal export facility proposal fit with goals of last December’s International Climate agreement to keep temperatures to no more than 1.5 degrees Celsius?

Scientists, 195 national leaders at Paris UN Conference and world religious leaders have pointed out the need to end the fossil fuel era to reduce worst effects of Climate Change and keep fossil fuels in the ground to have a livable planet for us and for our children and grandchildren. Recent studies have shown ever more sea level rise impacts than previously thought:

<http://www.nytimes.com/2016/03/31/science/global-warming-antarctica-ice-sheet-sea-level-rise.html?smprod=nytcore-iphone&smid=nytcore-iphone-share&r=0>

Public Entities like the County, State and Federal agencies have a responsibility to provide for public health, safety and welfare. Young people in Seattle challenged the State for the lack of political will to act on climate change greenhouse gas emissions and won. King County Superior Court Judge Hollis Hill has ruled that the threat of climate change is so urgent that the state must be placed on a court-ordered deadline to hold polluters accountable now. She commented: “The reason I’m doing this is because this is an urgent situation. (...) These children can’t wait, the polar bears can’t wait, the people of Bangladesh can’t wait. I don’t have jurisdiction over their needs in this matter, but I do have jurisdiction in this court, and for that reason I’m taking this action.”

<http://legacy.king5.com/story/tech/science/environment/2015/06/24/climate-change-ecology-judge-king-county/29221839/>

This coal export facility proposal creates serious environmental and moral crisis because of serious and life threatening impacts to the poor from Bangladesh to Native Communities in the US. We are currently at a threshold in the Northwest in how we respond to the need to protect public health, safety and welfare.

Again thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bob Zeigler". The signature is written in a cursive style with a large, prominent "B" and "Z".

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