

Testimony Regarding the Millennium Bulk Terminals-Longview SEPA Draft Environmental Impact Statement

To: Cowlitz County WA and the Washington State Department of Ecology.

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The MBT-Longview DEIS fails to account honestly for many costs of the proposed project. When these costs are factored in, there is inadequate justification for the project and the No Action Alternative must be selected.

COSTS TO MONTANANS ARE NOT CONSIDERED

The DEIS fails to account for threats posed by this project to human and animal health, water quality and ecosystem integrity along Montana's rails lines.

In Missoula alone, the project would increase health threats in our frequently inverted valley, increase delays at railroad crossings and threaten the integrity of the newly-restored Clark Fork of the Columbia River.

No Health Impact Assessment appears in the document and it dismisses fugitive coal dust as a "nuisance" in the face of compelling evidence that coal dust endangers both health and the integrity of rail bed ballast.

In approving any "action" alternative, Cowlitz County and Washington State would pass all of these costs on to Montanans as hidden taxes, unacknowledged by Washington officials and unapproved by Montana citizens.

SOCIAL COSTS DUE TO THE CARBON EMISSIONS ARE OBSCURED

Using as an example the 37.6 million tons of carbon dioxide equivalents [CO₂e] emitted under the *2015 Energy Policy Scenario**, and the U.S. government's mid-range estimate of the inclusive social costs that will be paid for every ton of CO₂e emitted [\$70.00**], the unacknowledged costs of this project would be \$2.6 Billion. Under different scenarios and cost calculations, this hidden tax could be more than twice as much.

CONCLUSION

Any honest and complete evaluation of the proposed project will acknowledge the costs identified above and all of the additional costs identified and discussed in other's testimonies. When that is done, the project will be seen to be economically, environmentally and morally unacceptable.

NOTES

* DEIS Table 5.8-9.

** July, 2015. Interagency Working Group on Social Cost of Carbon, United States Government. Technical Support Document: Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12366.