

May 29, 2016

Subject:

Millennium Bulk Terminals-Longview

SEPA Draft Environmental Impact Statement

To the Washington Department of Ecology, and Cowlitz County:

The lack of transparency surrounding this project, and stretching back visibly at least five years, calls into question the validity of the released SEPA Environmental Impact Statement (EIS) with regards to providing a complete and accurate analysis of both the short and long term consequences of this project, realistically proportioned between the undeniable health risks posed to the general (and largely opposed: <http://www.powerpastcoal.org/new-polling-strong-majority-of-washington-voters-oppose-coal-export-proposals/>) public, the incontrovertible environmental degradation that will ensue, and the project's profits and economical yields as perceived by corporate beneficiaries of the project and their supporters.

When Ambre Energy proposed their plans to build the Longview export terminal in November 2010, it was a figure of 5.7 million tons moved annually that was publicly on the record. However, internal Millennium Bulk Terminals emails disclosed in February 2011 revealed that "the company hopes to export 80 million tons of coal through its proposed west of Longview terminal, nearly 15 times more than the company originally stated in its application for county permit." (http://tdn.com/news/local/millennium-internal-e-mail-reveals-goal-of-million-tons-in/article_8a86fa28-4072-11e0-b60d-001cc4c002e0.html)

Joe Cannon, Millennium CEO, responded to outcry over the deception with the statement: "When any business develops a site, they're going to look at all kinds of things. Different people speculate on different things, and they send e-mails, and that's where they came from." This is an abysmal justification for the clandestine deliberation over making the proposed project the West Coast's largest coal terminal. Awareness of misleading the public and state regulators is blatant in a November 2010 memo, in which "Millennium's former chief executive, Jeff Torkington, wrote that Millennium should deliberately wait at least two months before proposing an expansion, warning that Millennium could be 'perceived as having deceived the agencies.'" As Gayle Kiser, a resident of Cowlitz County said: "They knew darn well what they were about in keeping this quiet." (<http://www.nytimes.com/2011/02/15/us/15coal.html>) The secrecy is

understandable, as this foot-in-the-door approach is the only scenario with any likelihood of succeeding in the face of monumental resistance to the project.

I remind you of this past misconduct, so that it may be agreed that the initial proposal itself established a precedent of deceit and obfuscation of the realities of this project. That a basis of transparency would then be adopted in the years following is a naive assumption to be made, and it's an insult to all those affected by these proceedings if such a change-of-heart is suggested to have taken place. We cannot afford to place credence in Millennium with so much at stake.

Because this EIS is designed to address the current proposal, the extent to which it accurately predicts the impacts of the site depends upon the realism of projections put forth by Millennium as to the scope of their operation. However, Millennium's credibility has already been called into question, and therefore it must be asked whether the conclusions of this study truly represent the consequences of their expansion if greenlit, as prior evidence suggests that they may not intend to operate under proposed circumstances.

The inherent inability of EISs to be fully objective is laid out in the following publication (<https://www.uow.edu.au/~sharonb/EIS.html>), and brings up the additional concern of what attempts can be made at gauging potential bias in the formation of this document, or otherwise account for what may be (in the best case scenario) simply a benign lack of thoroughness, through evaluating the scope of the document and the diligence of its content in considering real-world impacts upon the health of the public, and towards critically upholding a global commitment to safeguarding the environment. I mention this concern because I feel the study falls short in these objectives, with one comment on an RSN article regarding the project (<http://readersupportednews.org/news-section2/318-66/36631-proposed-coal-terminal-would-be-the-equivalent-of-adding-8-million-cars-to-the-road>) pointing out the obvious about the released EIS: "Work through the Draft EIS even quickly and you will see why we are failing to address climate change. Broad but insufficient and deceptive incidental acknowledgements of impact in technical terms that few citizens will ever penetrate, while justifying with broad conclusions," is the skewed evaluative approach taken to addressing the 217,500 public comments taken in February 2012, and in responding to the vast opposition demonstrated both online and by the many persons attending relevant hearings in protest of the project. Jan Hasselman, attorney for the Power Past Coal Coalition, also points out that the draft EIS is "relying on unproven mitigation," the addressing of which is another area for improvement. (<http://www.columbian.com/news/2016/apr/29/longview-coal-terminal-environmental-review-released/>)

However, even with its shortcomings, the report gives officials all the evidence they need to deny permits for the project. "The report lays out a laundry list of significant impacts from the project," says Lauren Goldberg, an attorney with the environmental group Columbia

Riverkeeper. “There are number of places where the report identifies the massive amounts of carbon that this project will spew – equivalent to roughly seven new coal-fired power plants. These are stunning impacts for a state like Washington that’s shutting down coal-fired power plants.” (<http://www.opb.org/news/article/environment-impact-longview-coal/>)

“The widespread notion that the climate is something we can fix later—after more pressing priorities have been addressed—may be the biggest obstacle to actions and policies that would slow global warming, avoid some of its worst potential impacts, and allow more time for humans and other species to adapt to a changing climate. Even though scientists have repeatedly emphasized the urgency of the situation, their message isn’t getting through to the general public or to legislators who could make a difference.” (<http://thebulletin.org/climate-change-irreversible-not-unstoppable8044>) And we’re out of time.

Washington must not rescind its pledge to authenticity and humanistic values in a dying world. I support the “no action” alternative in the Millennium Bulk Terminals Draft Environmental Impact Statement (EIS).

Reject coal export.

Regards,

Katelyn Wasierski
Resident of Bellevue, WA