

June 6, 2016

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To: SEPA Co-Lead Agencies:
Cowlitz County Department of Building and Planning
Washington State Department of Ecology

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

Dear SEPA Co-Lead Agencies:

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

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 US Endangered Species Act.

**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 SRKWs 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

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>.

⁵ https://www.nwfsc.noaa.gov/research/divisions/cb/ecosystem/marinemammal/satellite_tagging/index.cfm

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 satellite-tracking device was attached to individual whales in K and L pods. This NOAA-funded project has tracked the winter travels (from 2012 to present) 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 based on the project's direct impacts to this key salmon population.

Please address the following impacts 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 Orca, in the Columbia River...

- What is the economic threat from the loss of Orca 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 Orca 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 a “worst case scenario” look like for all the above plausible, compounding factors combined? 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?

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

Sincerely,

A handwritten signature in black ink that reads "Shaun Hubbard". The signature is written in a cursive, flowing style.

Ms. Shaun Hubbard
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