



A Washington State Chapter of the National Audubon Society
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Black Hills Audubon Society is a volunteer, non-profit organization of more than 1,300 members in Thurston, Mason, and Lewis Counties whose goals are to promote environmental education and protect our ecosystems for future generations.

June 12, 2016

The Black Hills Chapter of the National Audubon Society (BHAS) is an all-volunteer-based, non-profit organization whose 1,300 members share interests in birds and other wildlife, their habitats, and natural history. Our goals are to promote environmental education and recreation and to maintain and protect our ecosystems for future generations.

We recommend the "No Action" alternative for Millennium Bulk Terminals' proposal to build a coal export terminal in Longview, WA. Our opposition arises in four main areas:

- 1. Health dangers of coal dust** including exposure to residents as well as to coal-industry employees to toxic heavy metals like mercury and increased rates of chronic bronchitis, emphysema, and COPD, as well as for asthma especially in children. The Dept. of Ecology acknowledges that moving over 44 million tons of coal in uncovered trains and stockpiling it along the Columbia would harm people's health and the river. In particular, the Health Impact Assessment agreed upon in June 2015 is missing from the DEIS.
- 2. Increased burning of coal** in Asian nations, facilitated by transport from the US, thereby **increasing the carbon emissions that generate global warming** and prolonging the world's transition to cleaner alternatives. In turn these effects result in more forest fires, more flooding and lost agriculture, forestry and fishery revenues.
- 3. Likely disproportionately high impact on low-income and minority communities**, which are clustered near the proposed terminal location.
- 4. Adverse effects on wildlife.** The rail and vessel corridors servicing the proposed coal export terminal support habitats of critical importance to a variety of bird species. The Columbia River Estuary represents prime stopover habitat for migratory shorebirds and waterfowl within the Pacific Flyway. The western extent of the estuary is a designated Western Hemisphere Shorebird Reserve Network site that supports large numbers of shorebirds during migration.

The DEIS states that there may be adverse effects on birds such as Bald Eagle, Peregrine Falcon, Vaux's Swift, and several waterfowl species including Barrow's Goldeneye from coal dust deposited from the coal terminal project during operations.

Three of these species are on the at-risk list of 189 birds in Washington State identified in the National Audubon Society's *2014 Birds and Climate Change Report*.

In summary, we believe that the DEIS fails to address adequately many of the concerns about the proposed coal export terminal at Longview and as it stands the findings in the DEIS do not bode well for the coal terminal. We recommend "No action."

Thank you for the opportunity to comment on the proposed coal export terminal.

Sincerely,

A handwritten signature in cursive script that reads "Sam Merrill".

Samuel Merrill, Chair, Conservation Committee
Black Hills Audubon Society