



**325 W 28<sup>th</sup> Street, Suite 1  
Cheyenne, WY 82001**

June 13, 2016

Millennium Bulk Terminals – Longview SEPA EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, Washington 98104

SUBMITTED VIA E-MAIL AND VIA U.S. POSTAL SERVICE

Dear members of Cowlitz County and Washington Department of Ecology:

I write on behalf of the Wyoming Infrastructure Authority to express Wyoming's strong support for the Millennium Bulk Terminal (MBT) project and submit the following comments.

Wyoming is coal country. Wyoming is first in the country for coal production, a position it has held for years. Wyoming is home to more than 1.4 trillion tons of coal resources in seams ranging in thickness from five feet to some in excess of 200 feet in the Powder River Basin (PRB). Recent estimates indicate that Wyoming has more than 165 billion tons of recoverable coal. Wyoming's growth as the center of the nation's coal production has been driven by its low sulfur composition, its lower production costs due to coal's proximity to the surface and its world-class recoverable seams.

Coal mining companies pay taxes and royalties to federal, state and local governments. Coal is an important source of income for Wyoming is the state's second largest source of tax revenue for state and local governments. Coal contributed an estimated \$1.1 billion in taxes to Wyoming in 2014.

In 2014, Wyoming was home to approximately 20 coalmines that employed 6,578 workers. Coal industry jobs are among the best paying jobs in the state. On average, a Wyoming coal miner earns \$83,594 plus benefits – almost twice the statewide average of \$46,480. Estimates indicate that each coal industry position generates three additional jobs in the state.

Despite its abundance and affordability, efforts to decrease the nation's use of coal have impacted the industry and Wyoming's economy substantially.

Wyoming uses coal revenues to fund all aspects of education in Wyoming, including K-12, community colleges and the University of Wyoming, supporting both operational and capital construction. Because of the declining coal market, school districts across Wyoming are forced to make budget cuts. To date, 92 full time education positions have been cut, with more cuts on the horizon that will adversely impact instruction in the classroom. Wyoming recognizes that Washington is facing a similar challenge with funding education amidst a budget shortfall. Last summer, the Washington Supreme Court found the Legislature in contempt of court for failing to fulfill their own definition of the resources necessary to meet the constitutional requirement of providing a basic education to all Washington children. Our Legislature faces a similar challenge. MBT is an opportunity for Washington State and Wyoming to provide a new project and increase economic activity.

In addition to our shared challenge of funding education, Washington State and Wyoming have to consider the importance of providing jobs. The Millennium Bulk Terminal project is an opportunity to provide jobs and additional tax revenue to Longview, Cowlitz County and the State of Washington. As you know, the Proposed Action would have a direct economic construction output of about \$232 million supporting about \$70 million in direct wages. For Wyoming, two of the nation's largest coal mine operators, both located in Wyoming's PRB, have laid off hundreds of people because of a decline in domestic consumption of Wyoming coal. For years, the coal mining industry has directly employed some 6,500 people, providing a \$700 million payroll. For Wyoming, the least populated state in the nation, this is a significant number of jobs. These workers, who earn wages well above the state average, have been a critical economic driver in many Wyoming counties. Each coal mining jobs support an estimated three jobs in the service, supply and support industries around the state. Wyoming sees layoffs in these industries. Railroads, heavy equipment maintenance and machinists and the trucking industry have all suffered job losses. These layoffs not only hurt the coal miners who have lost their jobs, but our state's economy and communities.

Accordingly, Wyoming is encouraged to see that Asian demand for American coal is increasing. The United States holds nearly one-third of the world's total coal reserves. From a global perspective, Wyoming is sensitive to the fact that 1.2 billion people live in extreme poverty, lacking access to clean water and electricity. Access to affordable and, reliable energy provided by coal is key to sustained social and economic development for the world's poorest people.

With all these facts in mind, the Wyoming Infrastructure Authority (WIA) strongly supports the proposed Millennium Bulk Terminal (MBT) project. In 2004, the State of Wyoming created the WIA to boost the value of Wyoming's natural resources through investments in infrastructure. One of the areas of focus is the development of new coal export terminals. Wyoming is pleased to see forward movement on the project and Washington State's

commitment to ensure that the project receives the thorough review and analysis it is due through the issuance of the Draft Environmental Impact Statement (DEIS).

Wyoming is a public land state. The Bureau of Land Management, National Forest Service, National Park Service, and U.S. Fish and Wildlife Service manage nearly fifty percent of land located in Wyoming. As such, Wyoming routinely participates in federal land management processes pursuant to the National Environmental Policy Act. We appreciate the opportunity to comment in Washington's State Environmental Policy Act (SEPA) and further want to thank you in advance for the thoughtful consideration your state will afford Wyoming's comments.

As explained in the draft environmental impact statement (DEIS), there are three categories of environmental resources: (1) Built Environment; (2) Natural Environment; and (3) Operations. Wyoming offers the following comment on each category.

### 1. Built Environment

Wyoming sees no overwhelming analysis indicating that impacts to the Built Environment should prevent the Proposed Action from moving forward. As explained, the Proposed Action would:

- Not change land and shoreline use of the project area and would not change the land use character (S-12);
- Have negligible impacts on social and community cohesion and access to public services (S-12);
- Generate economic impacts in terms of jobs, wages, and economic output, as well as state and local sales and use revenues and business and occupation tax revenues (S-13);
- Not anticipate significant impacts on water and sewer service (S-13);
- Require implementation of railroad Quiet Zones to address increased noise impacts on minority and low-income populations (S-14);
- Provide visual features consistent with the general industrial context of the surrounding area (S-14 to S-15);
- Impact the designation of the Reynolds Metals Reduction Plant Historic District from retaining its eligibility for listing in the National Register of Historic Places, though a Memorandum of Agreement could resolve some of those impacts (S-15 to S-16);
- Not be expected to affect cultural resources (S-16);
- Result in impacts on tribal resources by causing physical or behavioral responses in fish or impacting aquatic habitat, though these impacts could be reduced through proposed mitigation measures (S-17);
- Require the Applicant to obtain a National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit and follow local and state

construction and demolition standards, including best management practices (S-17 to S-18);

- Require an NPDES Industrial Stormwater Permit and although new sources of hazardous material could be introduced, such as fuel, oil, grease, lubricants, hydraulic fluids, solvents and acids, such substances would be stored in small quantities and federal, state and local laws require plans for rapid reporting and clean up of such instances (S-18);

These impacts have been thoroughly analyzed and provide for mitigation, best management practices and compliance with local, state and federal laws. These measures support continued approval of the Proposed Action.

## 2. Natural Environment

Wyoming sees no overwhelming analysis indicating that impacts to the Natural Environment should prevent the Proposed Action from moving forward. As explained, the Proposed Action would:

- Involve ground-disturbing activities which could increase soil erosion, though on-site erosion hazard is relatively low due to the flat condition of the site and impacts to underlying soils could be avoided through standard engineering and construction methods (S-19);
- Potentially affect surface water in the study area by altering drainage patterns, though once operational, impacts on surface water and floodplains would be considered low (S-20);
- Result in 24.10 acres of permanent wetland loss though proposed mitigation would compensate for the loss of wetlands; once operational, the analysis found no impacts on wetlands (S-21);
- Groundwater recharge patterns on the deep and shallow aquifers would not result in a significant impact (S-21);
- Require the applicant to obtain a NPDES Industrial Stormwater Permit and develop a separate system of stormwater collection, treatment and discharge regulated by the permit; potential impacts on groundwater recharge or effects on groundwater supply are not considered significant (S-22);
- Disturb soil, though the Applicant would be required to obtain a NPDES Stormwater Construction General Permit and avoid and minimize short-term and long-term impacts on water quality (S-22);
- Require using materials and products that could introduce pollutants into surface water, though such outcomes could be addressed by the development and implementation of a site-specific construction Stormwater Pollution Prevention Plan that includes best

management practices for material handling and construction and waste management to reduce potential for water quality impacts (S-22 to S-23);

- Require in-water work and dredging that would disturb sediment on the river bottom, though the Applicant would be required to use standard best management practices that would help maintain acceptable water quality conditions during construction (S-23);
- Require demolition of existing structures, and thus, having the potential to affect water quality by disturbing soil or debris containing hazardous or toxic materials, though such impacts would be minimized by collecting and removing such debris and collecting and treating all stormwater from the site prior to discharge (S-23);
- Require the Applicant to develop a Water Quality Monitoring and Protection Plan, as approved by state and federal agencies, to avoid and minimize impacts on water quality (S-23);
- Permanently remove approximately 37 acres of non-wetland vegetation by clearing and grading during construction, though most of the clearing activities would affect already developed and disturbed portions of the project area that generally do not support native plant species or provide suitable habitat for animals (S-24);
- Include possible colonization of noxious weeds, though implementation of proposed mitigation measures could avoid and minimize invasion and colonization of noxious weeds (S-25);
- Would require the Applicant to utilize equipment and system operations to address concerns about fugitive emissions from coal dust from being deposited on vegetation, soils and sediments (S-25);
- Would address construction impacts on fish to reduce the noise level during in-water pile-driving activities (S-25);
- Require best management practices to ensure that the Proposed Action, once operational, would minimize impacts of shading on fish; further, fugitive coal dust and potential spills are not expected to significantly affect fish because potential risk for exposure is relatively low (S-26);
- Permanently remove terrestrial and aquatic habitats during construction that would affect wildlife though 151.61 of 201.95 acres of terrestrial habitat is comprised of previously developed or disturbed lands that do not generally support wildlife (S-27);
- Would require a continued commitment to monitor impacts of wildlife because, as the DEIS explains, there could be potential impacts once the Proposed Action becomes operational; the DEIS highlights areas where the Applicant can reduce risks for impacts (S-27 to S-28); and
- Would increase energy consumption, though the demand for energy would not be significant compared to current demand and would be met by the existing local and regional supply; the same holds true for demand for gravel, dirt and wood which would be available by existing local and regional supply (S-28 to S-29).

Again, these impacts have been thoroughly analyzed and provide for mitigation, best management practices and compliance with local, state and federal laws.

### 3. Operations

The DEIS analyzes the impacts for the operations resources, paying particular attention to rail transportation, rail safety, vehicle transportation, vessel transportation, noise and vibration, air quality, coal dust and green house gas emissions.

At the outset, WIA agrees with the DEIS' findings that, "There would be no unavoidable and significant adverse environmental impacts from coal dust." (S-37 and Chapter 5.7.8, page 5.7 to 5-27) Opponents of the project have incorrectly characterized that trains hauling coal to the facility would leave behind clouds of coal dust, causing significant human health and environmental impacts. This argument is without merit. Operators load coal into rail cars with a specific aerodynamic shape which helps eliminate dust. Coal operators and the railroad companies have also employed dust surfactants to the coal. These surfactants dry to form a non-toxic "crust," which virtually eliminates dust emissions.

Wyoming has a strong interest in ensuring that when PRB coal leaves our state, it does not do so leaving behind a cloud of dust. Perhaps the greatest evidence of the lack of environmental and human health impacts from coal dust is shown in the Powder River Basin coal mining area. During peak coal production, more than 100 trains left the area daily. This figure represents significantly higher train traffic than that which would be created by Proposed action. A visual survey of the landscape showed no impact from coal dust. Even more telling is Center for Disease Control data that shows in 2013, Wyoming's asthma rates were 9.1%, compared to 9.9% for the State of Washington. See [www.cdc.gov/asthma/most\\_recent\\_data\\_states.htm](http://www.cdc.gov/asthma/most_recent_data_states.htm). Wyoming has nearly a 10% lower rate for asthma, while having many times more coal trains passing through it than Washington. Asthma may be an issue in Washington, but it is not due to coal trains.

That said, Wyoming sees no overwhelming analysis indicating that impacts resulting from Operations should prevent the Proposed Action from moving forward. As explained, the Proposed Action would:

- Not exceed the capacity of the Reynolds Lead, BNSF Spur, and BNSF main line routes to transport construction materials (S-29);
- Require railroad companies to make investments and operating changes to accommodate growth in rail traffic (S-29);
- Increase the potential for train accidents, though implementation of proposed mitigation could address such impacts (S-30);
- Increase vehicle traffic and would require investment in addressing increased traffic (S-31 to S-32);

- Require implementation of proposed mitigation measures to support the DEIS's conclusion that increased vessel traffic could be managed within the existing infrastructure and systems for vessel management in the lower Columbia River and would not have a significant impact on the vessel transportation system (S-33);
- Require, as previously discussed, mitigation measures such as implementation of a Quiet Zone to address noise impacts (S-34);
- Not cause a significant change in air quality during construction and estimated maximum concentrations for each criteria air pollutant emitted from rail and vessel transport would be below National Ambient Air Quality Standards (S-35).
- Have a 0.3% increase in the total Cowlitz County carbon monoxide and volatile organic compounds emissions (S-35); and
- Require applicant to follow coal dust-control retirements to ensure that impacts of PM10 and PM2.5 emissions from rail transport related to the Proposed Action would remain below applicable federal and state air quality standards (S-36 to S-37);

These impacts have been thoroughly analyzed and provide for mitigation, best management practices and compliance with local, state and federal laws.

Finally, Wyoming strongly disagrees that the DEIS reference to life-cycle carbon emissions is warranted.. Further, as highlighted in the DEIS, greenhouse gas emissions outside Cowlitz County, once the project becomes operational, would be driven primarily by coal combustion in Asia and the United States. Within the coming years, as clean coal technology continues to develop, it cannot be said with any certainty how many metric tons of CO<sub>2e</sub> will be released. The DEIS compares this to the equivalent of adding 672,100 passenger cars on the road each year. The DEIS concludes that projected greenhouse gas emissions would be significant and unavoidable.

Wyoming has several concerns about this analysis. First, this type of analysis should have no bearing on this project itself and in fact, could set a sweeping precedent for other products exported out of the state. Jets and airplanes, for example, have significant lifetime carbon emissions that Washington should analyze under this precedent. Second, the national conversation about climate change ignores potential benefits of a warmer climate, such as increased CO<sub>2</sub> and precipitation would increase biomass by 40 percent. Finally, climate change advocates argue that as global warming increases temperatures, more people will die in heat waves. Such arguments never mention how a warmer climate will result in significantly less cold-related deaths. Only mentioning the negative aspects of climate change distorts the DEIS and should the co-lead agencies decide to continue its discussion about potential climate change impacts, it may wish to consider both sides of this already highly politicized argument. Wyoming, by contrast, would recommend only including a discussion about greenhouse gas emissions resulting from the construction and operations of the Proposed Action.

In conclusion, the co-lead agencies have done tremendous work in analyzing the Proposed Action, which includes the incorporation of 217,500 comments received during the scoping process. Of the many bulleted areas described above, the vast majority of impacts can be addressed through mitigation and best management practices.

Of the nine “unavoidable and significant impacts” identified in the DEIS, Wyoming is confident that interested stakeholders can make the Proposed Action work and we appreciate your continued work.

Thank you for the consideration of our comments. Please let me know if I can provide further information.

Sincerely,



Jason Begger

Executive Director, Wyoming Infrastructure Authority