

Monday, June 13, 2016

Millennium Bulk Terminals EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

Subject: Please reject proposal to build the nation's largest coal export terminal --
Millennium Bulk Terminals-Longview SEPA Draft Environmental Impact Statement

Dear Washington Department of Ecology, Cowlitz County, and Army Corps of Engineers,

Thank you for accepting comments on the Draft Environmental Impact Statement (EIS) for the largest coal export terminal proposal in the nation, the Millennium Bulk Terminals project. Many threats to public health and safety have been identified in the Draft EIS. This project threatens our climate and would harm our health and safety, air and water quality, natural resources, and communities throughout the Northwest, with the most intense impacts felt by residents of Longview, WA, and surrounding towns. I urge your agencies to protect public health and natural resources and reject coal export. I support the “no action” alternative and I urge your agencies to protect public health and natural resources and reject coal export.

“Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method.”

-- Theodore Roosevelt

This dirty project will undermine local, state, and federal efforts to combat climate change. If the Millennium Bulk Terminals project is approved, it could send 44 million tons of coal to Asia every year. That would be the equivalent of adding 600,000 new cars to the road each year. And when one accounts for operations and all the coal that would be burned in Asia, it is the equivalent to an increase of more than 2.5 million metric tons of global warming pollution per year. Considering rail and vessel emissions alone, this project would be one of the biggest greenhouse gas emitters in Washington State. The project would dramatically increase greenhouse gas emissions at a time when the Pacific Northwest and our nation must move rapidly toward more sustainable energy sources. The Northwest is leading the nation in the fight to combat climate change, but coal export undermines the region’s hard work to combat climate change and protect future generations.

“Then I say the Earth belongs to each generation during its course, fully and in its own right, no generation can contract debts greater than may be paid during the course of its own existence.”

-- Thomas Jefferson

The Draft EIS reveals many serious impacts to human health and the environment. It dismisses other impacts without a valid basis. The transportation of this coal poses a risk for everyone in its path. The coal would be sourced from mines in Montana and Wyoming, then loaded into uncovered boxcars to be transported by rail to the proposed terminal on the Columbia River. Coal dust from the mile-long coal trains would pollute nearby communities along the rail route, threatening clean air and water. Once the coal arrived at the Longview terminal, it would sit in enormous open-air piles, where winds would blow coal dust into the city of Longview, creating a public health hazard. The Final EIS should incorporate the best available science, real world examples, and a comprehensive Health Impact Assessment. The agencies undercut public, tribal, and agency input by failing to complete a Health Impact Assessment before releasing the Draft EIS.

“It is horrifying that we have to fight our own government to save the environment.”
-- Ansel Adams

Coal trains and ships emit dangerous and deadly diesel particle pollution. The Draft EIS demonstrates Millennium would have a severe impact on rail and road congestion and the increased shipping would threaten the tourism and fishing industries on the Columbia River. Because Millennium cannot fix these significant harms—from mine to terminal to the Pacific—the agencies should deny the permits. Coal trains derail, threatening homes, businesses, and the environment. Coal ships have accidents that threaten the health of our rivers and drinking water supplies. Emergency responders along the rail lines and at the export terminal in Longview, WA would face considerable delays at at-grade crossings and the terminal itself. These threats are well documented in the Draft EIS.

“As we peer into society’s future, we—you and I, and our government—must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow.”
-- Dwight D. Eisenhower

In some instances, the Draft EIS claims mitigation can reduce coal dust, rail traffic, and other project impacts. For example, to mitigate coal dust from the terminal, the Draft EIS proposes a reporting process for coal dust complaints. This borders on offensive. A phone call or email to complain about coal dust fouling a person’s lungs, home, and river is not “mitigation.” The agencies should revise the Draft EIS and remove inadequate, unsupported, and unenforceable mitigation.

“It is our task in our time and in our generation, to hand down undiminished to those who come after us, as was handed down to us by those who went before, the natural wealth and beauty which is ours.”
-- John F. Kennedy

The Draft EIS also fails to adequately address the cumulative impacts of other fossil fuel export projects proposed to be built in communities along the Columbia River in Washington and Oregon. This must be remedied in the Final EIS.

“Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish—indeed, all the living creatures of prairie and woodland and seashore—from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement.”

-- Theodore Roosevelt

The project will have disproportionate negative impacts on low-income, minority, and tribal communities along the rail route and near the terminal. I request that a comprehensive Health Impact Assessment with a public review process be included in the Final EIS.

“Do not suffer your good nature, when application is made, to say ‘Yes’ when you should say ‘No’. Remember, it is a public not a private cause that is to be injured or benefited by your choice.”

-- George Washington

To save our climate and communities, we must keep more than 80% of fossil fuels in the ground and finance a just transition to 100% clean energy by 2050. Those goals are incommensurate with new coal export terminals like Longview. Based on substantial threats to human health and safety that cannot be avoided or mitigated, please deny permits for the Millennium coal export project and select the “No Action Alternative.” Please make the right choice for our climate, our environment, and the health of communities in the Pacific Northwest. I urge your agencies to protect the Pacific Northwest and say no to coal exports in Longview.

“A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA