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

RE: Millennium Bulk Terminals-Longview SEPA DEIS

Greetings:

The Draft EIS for the Millennium Bulk Terminal does not provide a reasonably adequate discussion of the probable consequences of the proposed action. In particular, the DEIS does not adequately inform the decision-makers of the project's significant contribution to climate disruption.

Our civilization has acquired a potentially fatal addiction to fossil fuel consumption. The proposed action is designed and intended to enable that addiction. The coal export terminal is designed for a "minimum 30-year period of operation," exporting 44M metric tons of coal per year, to be burned on the far side of the Pacific. Over the course of 30 years, this totals 1.32 billion tons of coal. Even worse, the impacts of this operation will necessarily include the fuel burned by countless coal trains, and the noxious bunker fuel burned by 840 bulk cargo vessels per year, each making a 9,000 nautical mile round-trip.

But the DEIS does not adequately consider the adverse environmental impacts of 30 years of emissions from coal trains, from ocean-crossing vessels, and from burning the exported coal. Instead, the DEIS arbitrarily considers only the transportation and fossil fuel combustion emissions resulting from operations from 2018 through 2038. Worse, during nearly half of the evaluated time period, the facility will be operating at much less than full capacity. As a result, the analysis only considers ten years of full-capacity impacts – well under half of the 30-year total. But even this analysis is flawed: in Chapter 5, the DEIS designates 2028 as "the first year of full export capacity operation for the coal export terminal." However, this statement is contradicted twice in the "SEPA Coal Market Assessment Technical Report," which states on pages 4-4 and 6-1 that the terminal will start exporting 44 MMT of coal in 2025.

In addition, the analysis of greenhouse gas emissions in this DEIS "does not include emissions from future coal extraction in the Powder River Basin and the Uinta Basin" as a cumulative impact. SEPA requires an adequate discussion of a project's cumulative impacts. Because the DEIS does not reveal or evaluate the global warming impacts of consuming the energy needed to extract the coal without which this project would have no purpose, the DEIS is inadequate.

Sound Citizen Oversight & Permit Enforcement

Very truly yours,

SCOPE Law Firm, PLLC

By: 
Richard A. Poulin