

06 June 2016

Millennium Bulk Terminals - Longview SEPA EIS
c/o ICF International
710 Second Avenue, Suite 550
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Dear Staff,

The DEIS analysis of the proposed Millennium Bulk Terminals (MBT) project reveals many negative outcomes associated with construction and operation of the facility, but the greatest long-term negative for us all is the emission of greenhouse gases. That analysis estimated that construction activities from 2018 to 2020 would result in 23,601 metric tons of carbon dioxide equivalent (CO₂e), the same as adding about 5,000 cars to the road each year. Using a scenario that best represents current U.S. energy policy, the DEIS analysis found that operation of the coal export terminal would produce about 1.4 million metric tons of CO₂e annually during early years, then about 2.5 million metric tons of CO₂e annually under full operation. For construction and operations over a 20-year period, the study found the coal export terminal would result in about 37.6 million metric tons of greenhouse gas emissions.

The DEIS analysis then proposes the development of a greenhouse gas mitigation plan that would offset 50% of the increased CO₂e from the proposed project. But what of the remaining 50%? As the study states, **“the proposed project’s remaining projected contribution to greenhouse gas emission impacts, which are cumulative in nature, would still be significant and adverse.”**

There is abundant scientific evidence that now is the time to reduce greenhouse gas emissions, not increase them. The proposed MBT project will conflict with emission reduction goals recently adopted by the state of Washington. Furthermore, in November 2015 the King County Superior Court found that Washington state has a “mandatory duty” to “preserve, protect, and enhance the air quality for the current and future generations”. The presiding judge ordered the Department of Ecology to develop a science-based emissions reduction rule “by the end of 2016 and provide related recommendations to the 2017 legislature”. If these reasons alone are insufficient to stop the MBT project, I suggest consideration of recent relevant information not available for the DEIS development.

On Dec. 12, 2015, the 21st Conference of the Parties to the U.N. Framework Convention on Climate Change approved the Paris Agreement committing 195 nations, including the United States, to “holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C.” The Paris Agreement commits the world to adopt nationally determined policies to limit greenhouse gas emissions in accordance with those goals. Those temperatures are now the milestones by which the world measures all progress toward slowing global warming. So it is reasonable to ask the question, where are we today on the path toward meeting the 1.5 or 2°C goals?

Scientists and statisticians from Climate Central found that the “the world will have to dramatically accelerate emissions reductions if it wants to meet those goals”[1]. Those analysts combined data from NASA and NOAA to create an 1881-1910 average temperature baseline, unlike the baselines used by these agencies. 1881 is the earliest

date for which global temperature data are considered reliable. Calculating a 30-year baseline closer to the pre-industrial era provides a useful measure of global temperature for policymakers and the public to better track how successful the world's efforts are in keeping global warming below agreed-upon thresholds. When recent temperature data reported by NASA and NOAA were compared to this "early-industrial" baseline reference period, "the average global temperature change for the first three months of 2016 was 1.48°C, essentially equaling the 1.5°C warming threshold agreed to by COP 21 negotiators in Paris last December." These results do not mean that the battle is already lost, but they do indicate how close to the agreed-upon goals we may be.

The Intergovernmental Panel on Climate Change AR5 Working Group 1 Report contains projections of future global surface temperature change according to several scenarios of future socio-economic development. Most of those scenarios are presented using a 30-year baseline of 1986-2005. The Climate Central study showed that the difference between the 1986-2005 global average temperature value and the 1881-1910 average value is 0.61°C, about half the planetary warming allowed by the lower agreed-upon goal of 1.5°C. This adjustment has a significant effect on the dates at which the 1.5 and 2°C thresholds are crossed, moving them up by about 15-20 years. **If current emissions trends continue we could cross the 1.5°C threshold in 10 to 15 years, somewhere between the years 2025-2030**, compared to 2045-2050 when a 1985-2005 baseline is used [1].

To help slow the advance of disastrous climate change effects, attention should focus on policies that deliver the greatest reduction in those emissions in the shortest possible time. As presented in a working paper from the Stockholm Environment Institute (SEI), current global policies to reduce fossil fuel demand "are not advancing at the pace needed". In order to "enable a smoother, more rapid transition to a low-carbon future, one option for the U.S. is to reduce or end the issuance and renewal of U.S. government leases for fossil fuel exploration and extraction on federal lands and offshore" (Erikson and Lazarus [2]). That SEI study found that restricting coal leases would cut annual emissions by 107 million tons, partially offset by 36 million tons of additional emissions from natural gas because of switching between fuels. Phasing out all fossil fuel leasing would add up to 100 million tons of emissions reductions in 2030, and probably more in later years, the study found. Other policies would be much less effective (see Erikson and Lazarus [2] for examples).

The SEI work builds on recent studies that project emission pathways toward the international goal of keeping warming below 2°C. Two such studies referred to by Erikson and Lazarus [2] "suggest that to be consistent with a 2°C goal, the U.S. would need to cut aggregate fossil fuel production by 40–44 percent from current levels by 2040". Greater reductions would be necessary to achieve the 1.5°C goal. Under the Clean Power Plan, energy production would grow 11 percent by 2040, which is clearly undesirable. "Avoiding dangerous climate change will require a rapid transition away from fossil fuels. By some estimates, a phase-out of global fossil fuel consumption and production – particularly coal and oil – will need to be nearly complete within 50 years. Our analysis finds that under such a policy, U.S. coal production would steadily decline, moving closer to a pathway consistent with a global 2°C temperature limit" states the SEI study.

The Obama Administration is considering changes to its coal leasing program in light of concerns about "whether the leasing and production of large quantities of coal... is consistent the Nation's goals to reduce greenhouse gas emissions" (BLM [3]). Forty percent of all coal extraction occurs on federal lands and waters (U.S. EIA [4]). A

decision to cease all new leases and non-producing lease renewals for fossil fuel production on federal lands and waters could leave 4 billion short tons of federal coal in the ground that otherwise would be combusted between now and 2040, equivalent to about 7 Gt of CO₂ emissions.

If the MBT project were approved, a decision to end coal leases on federal lands would result in stranded infrastructure assets and unemployment for the 135 permanent new workers identified in the DEIS. Such a policy decision has not been considered in the DEIS analysis of the proposed MBT project. In light of the information presented here, continuation of the MBT project should absolutely be rejected. Consequently, I support the No-Action alternative presented in the DEIS.

Sincerely,



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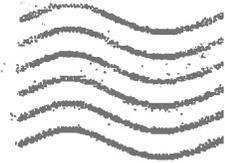
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