

Congress of the United States
Washington, DC 20515

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June 13, 2016

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Dear Governor Inslee;

We write to voice our support for the proposed Millennium Bulk Terminal-Longview (Millennium) project in Cowlitz County, Washington. We invite your attention to a specific aspect of the project's State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (DEIS) which may pose an undue burden upon interstate and international commerce. The proposed requirement for mitigation of greenhouse gases from coal consumed overseas is an unprecedented step that is not applied to other businesses operating in Washington or other goods that are shipped through the state. We respectfully request that you reconsider this requirement.

In order to address the impact on Washington State from greenhouse gas emissions of the project, the draft EIS proposes that Millennium mitigate 50 percent of the greenhouse gas emissions produced by the exported coal, regardless of where that coal is consumed. To quote the draft EIS, "For operations at maximum capacity this is 1.27 million metric tons CO₂e per year (or 50% of 2.53 million from 2028 to 2038)." Even assuming a modest carbon credit price of \$20 per ton, compliance with that requirement would cost Millennium more than \$25 million annually. This exceeds the amount that Millennium estimates it will spend to pay its workforce—traditionally the highest operating cost of such an enterprise—and may render the project unfeasible.

Washington is one of the nation's, and the world's, busiest and most valuable trade hubs, with more than \$90 billion worth of goods exported in 2014, according to the Washington State Department of Commerce. Further, the department estimates that one in three jobs within the state are tied to trade, either directly or indirectly. Washington State is already home to the nation's 5th largest coal export facility by volume, located in Seattle. However, no other project or terminal is required to mitigate the lifecycle emissions of exported items.

For example, the Boeing Corporation, based in Washington State, is both a major supplier of exported goods as well as a provider of a means of export. Boeing employs more than 75,000 people in Washington. The company aims to keep its greenhouse gas emissions at or below 1.3 million metric tons, according to their most recent environment report in 2014. This figure is simply Boeing's industrial and testing emissions. Boeing is not required to mitigate these emissions, much less the millions of tons its aircraft emit annually. Millennium should not be required to do so either.

Millennium does not object to offsetting its emissions generated at the site. However, the mitigation requirements as proposed in the draft EIS are overly broad. We urge you to support the jobs created in Cowlitz County and the economic and environmental restoration that the Millennium project will support and revise the mitigation requirements accordingly.

Sincerely,


Michael B. Enzi
United States Senator


John Barrasso, M.D.
United States Senator


Cynthia M. Lummis
U.S. Representative

Congress of the United States
House of Representatives
Washington, DC 20515-5001

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