

May 20, 2016

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Millenium Bulk Terminals EIS
% ICF International
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Re: Comment on the DEIS for the proposed Millenium Bulk Terminals coal export terminal in Longview

To the co-lead agencies, Cowlitz County and the Washington State Department of Ecology:

My overriding concern, and the overriding concern of everyone reviewing new energy infrastructure proposals must be the long-term effect of the proposal on the crucial international efforts to hold global warming below 1.5 or 2 degrees Celsius, the threshold beyond which looms civilization-threatening climate disruption. In April, cumulative CO₂ levels reached 407.42 parts per million as recorded at the Mauna Loa Observatory in Hawaii, a level not seen on earth since the Miocene epoch, 10 to 15 million years ago. And Co₂ emissions continue to rise with frightening speed. We are on a trajectory to warm 4 to 6 degrees Celsius beyond pre-industrial levels by the end of the century. **We do not know if humans can survive a 6 degree C climate.** For years, Jim Hansen, the world's foremost climate scientist, has warned the we have a narrow window of opportunity to drastically reduce our use of fossil fuels and halt anthropogenic climate change before dangerous tipping points and feed-back loops take it beyond human control. Our time for action is running out.

Climate disruption is already scorching India, where the temperature reached 123.8 F in April, killing hundreds and destroying crops in at least 13 states. Climate disruption is fueling the massive Alberta wildfire that forced 90,000 people to evacuate their homes and is now spreading into Saskatchewan. In Africa 36 million people are on the verge of famine, due to climate-change

escalated drought, while in Australia 93 percent of the Great Barrier Reef has suffered heat-related coral bleaching and death. Climate disruption is accelerating the sixth great extinction of life on earth, an extinction which if it continues at the present rate, will eliminate half the plants and animals on our planet by the end of the century. We are facing the greatest threat to survival humans have ever faced. **"Because CO2 stays in the atmosphere for over a century, the only thing that matters in limiting temperature is cumulative emissions, the total concentration of greenhouse gases we dump into the atmosphere"** warns Kevin Anderson, climate advisor to the British government and former director of the Tyndall Energy Program. What would it take, Anderson asks, to target 2 degrees C realistically? "No carbon tax is going to do that. We won't get there through innovation or new technology, even if we spend a trillion a year for the next few years. The only conceivable way to produce that level of reductions," says Anderson, "is a full-scale, all-hands-on deck mobilization, what William James called 'the moral equivalent of war.'"

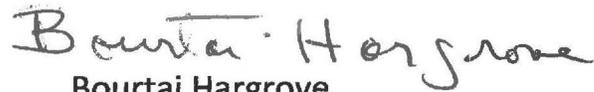
The draft environmental impact statement for the Millenium Bulk Terminals finds that **life-cycle greenhouse gas emissions from the project are equivalent to over seven coal-fired power plants.** Table 47 at the Greenhouse Gas appendix is crucial. It provides a range of different scenarios and the impact of each. When coal prices are highest, it finds 27 million tons/year net CO2 emissions. Greenhouse gas emissions outside of Cowlitz County would be driven by coal combustion in Asia and the United States. Emissions vary across four coal market assessments (see Table 5.8-2.) Under the preferred 2015 Energy Policy scenario, the net annual emissions from the project would be 3.2 million metric tons of CO2e (CO2 equivalent.) **This is the equivalent of adding about 672 passenger cars on the road each year.** The total net emissions for the preferred 2015 Energy Policy scenario from 2018 to 2038 would be 37.6 million metric tons of CO2e. (DEIS at S-38).

Given these findings, it is unthinkable that the project will be permitted. **No mitigation is possible.** Although mitigation measures during construction and operation could reduce emissions slightly in Cowlitz County, they would have no effect on emissions from burning the coal in Asia and elsewhere. As the DEIS finds, the project would have "significant unavoidable impacts." Summary at S-2. The final EIS must conclude that all permits for the proposed Millenium Bulk Terminals project for Longview will be denied.

The decisions we make on fossil fuel infrastructure today will determine if our grandchildren and all future generations live in a hot, but still livable climate, or suffer unprecedented storms, sea-level rise, droughts, heat waves, food and water shortages, resource wars, desperate climate refugees, and the loosening of the bonds which hold civilization together.

All permits for the Millenium Bulk coal terminal planned for Longview must be denied.

With hope for a livable climate,

A handwritten signature in black ink that reads "Bourtai Hargrove". The signature is written in a cursive, slightly slanted style.

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