

Re: Docket number 2013-19738: Comment on scope of EIS for Millennium Bulk Terminals Longview LLC Coal Export Terminal

To: US ARMY CORPS OF ENGINEERS

From: Laurie Dougherty - 462 20th Street Salem, OR - 617-504-0016 - lauriedougherty@gmail.com

In developing the scope of the Environmental Impact Statement for the Millennium Bulk Terminals Longview LLC Coal Export Terminal the Army Corps of Engineers must fully apply its own **Environmental Operating Principles** and consider the full range of impacts - local, regional and global - that would result from building this terminal.

The **US Army Corps of Engineers Environmental Operating Principles** as stated on the USACE website <http://www.usace.army.mil/Missions/Environmental/EnvironmentalOperatingPrinciples.aspx> are excerpted here:

"The United States Army Corps of Engineers Environmental Operating Principles were developed to ensure that Corps of Engineers missions include **totally integrated sustainable environmental practices**. The Principles provided corporate direction to ensure the workforce recognized the Corps of Engineers role in, and responsibility for, sustainable use, stewardship, and restoration of natural resources across the Nation and, through the international reach of its support missions.

Since the Environmental Operating Principles were introduced in 2002 they have instilled environmental stewardship across business practices from recycling and reduced energy use at Corps and customer facilities to a fuller consideration of the environmental impacts of Corps actions and meaningful collaboration within the larger environmental community....

....In particular, the strong emphasis on sustainability must be translated into everyday actions that have an effect on the environmental conditions of today, as well as the uncertainties and risks of the future. These challenges are complex, ranging from global trends such as increasing and competing demands for water and energy, climate and sea level change, and declining biodiversity; to localized manifestations of these issues in extreme weather events, the spread of invasive species, and demographic shifts. Accordingly, the Corps of Engineers is re-invigorating commitment to the Environmental Operating Principles in light of this changing context.

The Environmental Operating Principles relate to the human environment and apply to all aspects of business and operations. They apply across Military Programs, Civil Works, Research and Development, and across the Corps. The Principles require a recognition and acceptance of individual responsibility from senior leaders to the newest team members. Re-committing to these principles and environmental stewardship will lead to more efficient and effective solutions, and will enable the Corps of Engineers to further leverage resources through collaboration. This is essential for successful integrated resources

management, restoration of the environment and sustainable and energy efficient approaches to all Corps of Engineers mission areas. It is also an essential component of the Corps of Engineers' risk management approach in decision making, allowing the organization to offset uncertainty by building flexibility into the management and construction of infrastructure.

The re-energized Environmental Operating Principles are:

- Foster sustainability as a way of life throughout the organization.
- Proactively consider environmental consequences of all Corps activities and act accordingly.
- Create mutually supporting economic and environmentally sustainable solutions.
- Continue to meet our corporate responsibility and accountability under the law for activities undertaken by the Corps, which may impact human and natural environments.
- Consider the environment in employing a risk management and systems approach throughout the life cycles of projects and programs.
- Leverage scientific, economic and social knowledge to understand the environmental context and effects of Corps actions in a collaborative manner.
- Employ an open, transparent process that respects views of individuals and groups interested in Corps activities."

Allowing the Millennium Bulk Terminals for coal export would put the Army Corps of Engineers in violation of its own Environmental Operating Principles. If proposed plans to ship up to 44 million tons of coal a year from the Port of Longview are implemented, both the health of the local community and the water quality of the Columbia River with its valuable fisheries and recreation opportunities will suffer from toxic coal dust spilling from uncovered trains and blowing off storage sites while waiting for loading onto ships. These coal export plans will create a hazardous waste site of massive proportions for future generations to clean up. Furthermore, burning the coal in Asia will worsen climate change, sea level rise and ocean acidification.