

I'm 62 years old and have lived in Skagit County near the town of Bow, WA for that last 13 years. I'm concerned about the world we are leaving for the next generations. I have a stepson, and 3 nieces and nephews, who I hope will be around a lot longer than I will.

I am asking that you include in the scope of the EIS for the Millennium Bulk Terminals at Longview, the effects of burning U.S. coal overseas on production of green house gases, the driver of global climate change and ocean acidification which, left unchecked, promises drastic changes in our environment which will eventually make our planet unlivable. Please consider that the changes to the atmosphere and the oceans from our activities may happen very quickly, within a human lifetime, whereas reversing these changes happens in geologic time, taking centuries or millennia.

Please include in your analysis consideration of the following:

The EPA has recognized CO₂ as a pollutant. It is beginning to regulate emission. "The New Source Performance Standards (NSPS) state that any new coal-fired power plant in the US must meet a very tight standard for low CO₂ emissions. If we build a new facility (the export terminal) for the specific purpose of supplying coal to be burned in a manner that does not meet these new standards, then that undermines the entire purpose of the NSPS standards." ^(1.)

Burning 48 million metric tons of coal produces about as much green house gas emissions as Washington State now produces annually. Enabling this amount of combustion abroad essentially negates the progress and commitment communities in Washington have made to address climate change. ^(2.)

Please study whether the planned export of 44 million tons of coal from Longview to China to be burned as fuel, releasing approximately 90 million tons of green house gases into the atmosphere, is consistent with the following actions taken by our federal and Washington State governments to address our need to reduce green house gas emissions:

- The U.S. is a signatory to the Copenhagen Climate Accord. The intent of this document agrees that large reductions in green house gases are required.
- In 2008, Washington State passed legislation adopting greenhouse gas reduction standards. ^(3.) "The statute establishes that by 2020, emissions shall be reduced to 1990 levels. By 2035, GHG emissions are to be 25 percent below 1990 levels and by 2050, they are to be 50 percent below 1990 levels....The coal terminal, if permitted, would offset a considerable portion of these reductions. Since CO₂ is a global pollutant, it would be futile to reduce local emissions while facilitating an increase elsewhere." ^(1.)

Where I live, there is a considerable amount of shellfish farming. In Samish Bay, just a few miles up the road, shellfish farming is closed for significant periods of time each year for a variety of reasons. Stress from ocean acidification only magnifies this stress. In an executive order passed by Washington State in Nov. 2012, Christine Gregoire, Governor of WA State initiated action to address ocean acidification. The order directs:

"The Office of the Governor and the cabinet agencies that report to the Governor to advocate for reductions in emissions of carbon dioxide at a global, national, and regional level."

Please study how the impact on ocean acidification from burning 44 million tons of coal a year in

China, which reaches us in ocean currents, would effect marine fisheries jobs, a huge industry in Washington State.

Study whether, or if, China would get coal elsewhere, if we don't send it to them. If they have to pay more for it, will they use less? Dr. Thomas Power in: "The Greenhouse Gas Impact of Exporting Coal from the West Coast: An Economic Analysis," concludes that:

"...the proposed coal export facilities in the Northwest will result in more coal consumption in Asia and undermine China's progress towards more efficient power generation and usage. Decisions the Northwest makes now will impact Chinese energy habits for the next half-century; the lower coal prices afforded by Northwest coal exports encourage burning coal and discourage the investments in energy efficiency that China has already undertaken. Approving proposed coal export facilities would also undermine Washington State's commitment to reducing its own share of greenhouse gas emissions."

Please consider that, whether or not our sending coal to China influences the amount they burn or not, we are still morally responsible for the coal China burns that we send them.

In addition to the impacts of GHG's released by **burning** the quantity of coal we would be sending China from Longview, please study the impacts of GHG emissions from the **mining and transport** of that coal on atmospheric climate change and ocean acidification.

Please consider the **cumulative effect** of all the coal that would be burned should all the proposed coal export terminals be built. (This was written when all six proposals were still on the table. Statistics have changed, but since the two largest proposals are still being considered, the message is qualitatively unchanged.):

"Burning 140 million tons of Powder River Basin coal releases roughly 250 million tons of heat-trapping carbon-dioxide into the atmosphere, roughly equivalent to the annual emissions from 57 million cars. A large coal-fired power plant like the one in Centralia, Washington (now scheduled to phase out coal-burning), emits about 10 million tons of carbon dioxide per year. In fact, the carbon content of the coal proposed for export would vastly exceed the carbon from the dirty oil sands fuel planned for transport in the controversial Keystone XL pipeline." ^(4.)

Thank you for your consideration of these concerns.

Notes:

1. James Wells, "Don't Pee in the Pool!"; Jan. 5, 2013, published in Daily KOS
2. Letter from King County Executive, Dow Constantine; to WA State Dept. of Ecology, and Whatcom County Executive, Jan. 13, 2012
3. See RCW 70.235.070(1)(a)
4. Eric de Place, "Northwest Coal Exports: Some common questions about economics, health, and pollution." November, 2012; published by Sightline Institute