

Submitted at Tacoma Scoping Hearing for Millennium Bulk Terminals, Longview on October 17, 2013 – 4 pages

To: U.S. Army Corps of Engineers, Seattle District
Washington Department of Ecology
Cowlitz County

Dear Co-Lead agencies:

Re: Scoping comment Millennium Bulk Terminals, Longview

Millennium Bulk Terminals, Longview (MBTL), a subsidiary of Amber Energy North America, Inc. and Arch Coal, Inc., proposes to construct a coal terminal and two docks to export at least 44 million metric tons of coal annually from the Powder River Basin to Asia, for burning in coal-fired power plants. Coal would arrive at the terminal via rail and would be exported by way of the lower Columbia River to Asia in large bulk carrier (Panamax) vessels.

Please include within the scope of the EIS for MBTL the impacts upon the atmosphere (including release of greenhouse gasses) and upon the oceans and Salish Sea (including ocean acidification, other changes in ocean chemistry and mercury pollution) from the export of coal from MBTL and burning the exported coal. The project proposed by MBTL and its impacts are global in scope. But significantly the export project would impact not only the environment in Asia but also the atmosphere and oceans of Washington State.

Please include within the scope of the EIS, a comprehensive study of the **cumulative impacts** of the MBTL including from the mining, rail and ship transportation, and burning of the Powder River Basin coal from the inception of the MBTL project and throughout the life of the project:

1. on the atmosphere (including all climate impacts) in Washington;
2. on waters of Pacific Ocean and Salish Sea (including all ocean acidification and other ocean chemistry impacts on these waters) in Washington State and on all marine and terrestrial species in and dependent upon these waters;
3. on all Washington State waterways and land, including agricultural lands, from atmospheric mercury and all other air-borne pollutants; and
4. on existing and future generations of residents and on businesses in Washington State, including on all fisheries and recreation-related businesses from the impacts described in items 1-3 above.

Please determine how the MBTL project would not only contribute to but also worsen existing climate change, changes in ocean chemistry and air-borne pollutants that, in turn could result in the suffering of human populations as well as decline of non-human species. Please also include within the EIS scope, a comprehensive study of the **cumulative impacts** from the MBTL described in items 1-4 above in addition to impacts from all other coal export terminals

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proposed for Washington State and Oregon and from all existing and planned coal terminals in British Columbia, including the terminal planned at Frasier Surrey Docks.

Northwest Jobs Alliance, a group primarily composed of applicant coal and rail companies, asserts in the press and, doubtless behind closed doors with elected officials and other decision-makers, that MBTL and similar plans to ship coal for burning in Asia will not result in additional climate/ocean chemistry change because Asia will burn comparable amounts of coal from other sources anyway. This inevitability argument deserves your skepticism. The argument comes from duplicitous climate change deniers (please review remarks of Northwest Jobs Alliance's representative in references below). In addition, there is no legitimate purpose and need to export PBR coal from MBTL to Asia; instead, it is the proposed closing act of a declining industry (please review references below). Are the co-lead agencies willing to build a legacy of significant harm to the Washington environment and to the climate on the rickety foundation offered by the applicants and those in their tow? Instead, please leave a legacy that protects the public trust and the lives of future generations of Washingtonians by preparing an EIS that carefully and thoroughly examines the impacts and cumulative impacts of MBTL on the atmosphere and oceans.

For the U.S. Army Corps of Engineers: it is not a valid, perhaps not even legal, response to requests such as mine to turn a blind eye to impacts of which you are aware that would likely occur outside a small area at the terminal itself. NEPA and CEQ policies envision that you must partner with other federal agencies, in this case such as the Bureau of Land Management and the Surface Transportation Board, to address issues you deem to be outside your own expertise. Each step of the MBTL project (from mining the Powder River Basin coal to burning it in Asia) would have profound environmental impacts that merit detailed study. In this case, one of the applicants, Arch Coal, is also mining the coal. Therefore I strongly urge you to include within the scope of the your EIS all impacts of MBTL along with all other relevant federal partners involved in what is actually **one project** consisting of several parts over a wider geographic area than just the coal terminal site.

Please review the contents of my references starting on page 3 below, which are incorporated into this comment for all purposes. Thank you for your attention to my comments.

Sincerely,



Mary Ruth Holder
Mount Vernon, Washington

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http://www.powereconconsulting.com/WP/assets/GHG-Impact-PRB-Coal-Export-Power-Consulting-May-2013_Final.pdf

Stark, Mike, Why Are Coal Industry PR Pros Laughing About Climate Change in Private Talks on Export Terminals?, October 8, 2013, <http://www.desmogblog.com/2013/10/08/lauri-hennessey-arch-coal-laughing-about-climate-change> (Quote from Lauri Hennessey representative of the Northwest Jobs Alliance “But someone from Peabody [Coal] got on a call, it was my second week on the job, and said, ‘You were quoted saying coal’s worried about climate change? We don’t believe in climate change!’ And I remember I was on the phone and I was like, ‘I can’t say that..ha. I can’t say that in Seattle!’ [laughter]”)

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