



November 18, 2013

Millennium Bulk Terminals-Longview EIS
c/o ICF International
710 Second Avenue
Suite 550
Seattle, WA 98104

*Protecting and
Preserving
Puget Sound*

RE: Scoping Comments for Millennium Bulk Terminals - Longview EIS

5305 Shilshole Avenue NW
Suite 150
Seattle, Washington
98107

Dear Co-Lead Agencies Cowlitz County Department of Building and Planning, the U.S. Army Corps of Engineers, and the Washington State Department of Ecology:

P 206.297.7002
F 206.297.0409

Thank you for the opportunity to provide scoping comments for preparation of an Environmental Impact Statement (EIS) for the proposed Millennium Bulk Terminals – Longview LLC (MBTL) shipping terminal to export coal at the site of the former Reynolds Aluminum smelter in Cowlitz County.

www.pugetsoundkeeper.org

This letter is submitted on behalf of Puget Soundkeeper Alliance (Soundkeeper). Soundkeeper is a non-profit organization with its mission to protect and preserve Puget Sound by monitoring, cleaning up and preventing pollutants from entering its waters. Soundkeeper uses legal and regulatory tools in addition to operating a proactive pollution prevention and cleanup program to accomplish its mission. Soundkeeper was founded in 1984 as the first citizen advocacy organization to focus on the health of Puget Sound.

Far Reaching Impacts

Even though the MBTL project is not located in the Puget Sound region, it will most certainly impact Puget Sound and its residents due to its far reaching impacts around Washington State, the Pacific Northwest, nationally and globally. Due to the wide range of impacts, it is important for Soundkeeper to speak up and urge the lead agencies to consider the broad scope of impacts of this project.

Soundkeeper and its members are extremely concerned about the enormous breadth of potential and likely health and environmental impacts of the proposed MBTL coal export facility, along with the associated transportation, handling and combustion of the dirty carbon-based fuel. These impacts will adversely affect not only the rich and valuable Lower Columbia River, but also water, land and air resources nationally and globally. Soundkeeper and its members strongly believe that the sheer scale of the project is worthy of special consideration. In particular, Soundkeeper believes that the



scale of this and the other related coal export projects warrant a consideration of the certain exacerbating effects on the serious and worsening issues of climate change and ocean acidification.

WAC 197-11-060 (4)(c) states that “agencies shall carefully consider the range of probable impacts, including short-term and long-term effects. Impacts shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer.”

WAC 197-11-060 (4) (d) states that the “proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions.”

Soundkeeper urges the U.S. Army Corps of Engineers, the Washington Department of Ecology and Cowlitz County Department of Building and Planning (Agencies) to consider the vast and full range of both short-term and long-term, direct and indirect impacts of this project on the Lower Columbia River, the broader Columbia River Basin and all along the projected rail route, as well as the health, cultural and economic well-being of all impacted residents and communities around the state, the nation and the world, especially those most impacted by climate change, sea level rise, ocean acidification and aerial deposition of pollutants from coal burning in Asia.

Project Impacts Regionally and Globally

WAC 197-11-060 (4)(b) states: “in assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC 197-11-330(3) also).”

Waterkeepers around the globe recognize that we are connected in a global community and share a complex system of resources, each of which depends largely upon the health of the others.

It is undeniable that the impacts of this project transcend geographic boundaries. MBTL would serve to link coal mining in the Central Northern United States to coal combustion in Asia. As such, the EIS must consider the impacts of coal mining in the Powder River Basin and coal burning in China, India and Bangladesh.

Please consider the impacts of this project on the coal mining communities in Montana and Idaho. Please consider the impacts to every community along the transport route between the western United States, through Washington and across the ocean to Asia. What are the impacts of coal dust from rail cars and diesel particulates coming off the trains, barges, transfer stations and loading areas on surrounding communities, people, wildlife and waterways?

Please fully consider the increased risk of a marine accident that could result in a major oil spill in the Lower Columbia River or any water system along the route.

Please consider the impacts of the air pollution in the western United States caused by the combustion of the coal that this project would export to Asia. Please measure the mercury pollution, fine particulates and other air pollutants that will blow back across the Pacific Ocean and pollute Pacific Northwest airways and waterways after the coal has been burned in power plants in India and China.

Please consider all of the costs of continuing to develop the coal industry, including health impacts on everyone from coal mine employees to the residents of coal burning communities. Please also consider the worsening harm to our climate that will result from increasing our consumption of coal, one of the worst sources of fossil fuel emissions.

In summary, Soundkeeper would like to emphasize the importance of including in the EIS the full spectrum of impacts that would result from this project, including the aforementioned impacts on the Lower Columbia River, impacts on the residents and communities throughout the Columbia River basin and impacts regionally and globally.

Soundkeeper urges the Agencies to conduct a full environmental analysis which considers the short-term, long-term, direct, indirect, local, regional, national and global impacts of this project.

Please consider the environmental, health, cultural and economic benefits of a no-action alternative.

Precedent for Future Actions

Please also consider the precedent that this proposal will set for future actions. The proposed project is nothing short of disturbing, alarming and life-changing for those concerned about the health of our region. However it also provides our region a critical once-in-a-lifetime opportunity for us to do our part in addressing carbon emissions on a global scale.

In July, Whatcom County Planning and Development Services (County), the Washington State Department of Ecology (Ecology), and the U. S. Army Corps of Engineers (Corps) announced the State Environmental Policy Act (SEPA) scope of analysis and the National Environmental Policy Act (NEPA) scope of analysis, as well as the geographic extent of evaluation, for the Environmental Impact Statement (EIS) for the proposed Gateway Pacific Terminal (GPT) and Custer Spur improvement projects.

Despite Army Corps' myopia in deciding to study only site-specific impacts of the GPT project, **Soundkeeper would like to commend Washington State Department of Ecology for their decision to conduct a SEPA analysis which examines a broader range of impacts**, including a detailed assessment of rail transportation on other representative communities in Washington and a general analysis of out-of-state rail impacts, an assessment of how the project would affect human health in Washington and a general assessment of cargo-ship impacts beyond Washington waters. Ecology also vowed to analyze greenhouse gas emissions resulting from terminal operations, and the transportation of the commodities (rail and vessel) and greenhouse gas emissions from the end-use of coal. With this decision, Ecology demonstrated its willingness to

live up to its environmental responsibilities on this issue. Moving forward with the MBTL scoping process, Soundkeeper encourages Ecology to continue to exhibit the leadership our region needs. Please follow suit with the GPT scoping decision and study an equally broad range of impacts for the MBTL project.

Thank you for your consideration of these comments, submitted on behalf of Puget Soundkeeper Alliance. Please enter this document into the record for this matter and keep me on the service list for this action. My email address is katelyn@pugetsoundkeeper.org.

Sincerely,

Puget Soundkeeper Alliance

A handwritten signature in black ink that reads "Katelyn Kinn". The signature is fluid and cursive, with a long horizontal flourish at the end.

Katelyn Kinn
Legal Affairs Manager

A handwritten signature in black ink that reads "Chris Wilke". The signature is cursive and somewhat stylized, with a prominent "C" and "W".

Chris Wilke
Puget Soundkeeper and Executive Director