November 18, 2013

My name is Jill MacIntyre Witt. I live in Bellingham and am deeply concerned about the future of our planet. I am a certified climate change presenter with the Climate Reality Project and understand the significant adverse impacts from this proposal in relation to climate change. The following comment is to address the on-site and off-site impacts to the proposed coal export terminal at Longview with the Millenium Bulk Terminal (MBT). The following impacts will adversely impact Longview, the region and the earth as a whole. We cannot ignore that the proposed commodity, coal, for shipment from MBT will be burned and produce significant impacts in relation to climate change. We must be concerned with how this will impact our world. It is reasonably foreseeable that this project, if built, would result in an increase in the impacts of climate change, when burning 44 million metric tons of coal per year that was shipped from the proposed port. These impacts are significant and go against our efforts to reduce contributions to climate change. It seems reasonable to request that you include at least studies on the following local impacts from climate change:

- Changes in snowpack level and its impact on our drinking water, river system ecology and agricultural needs.
- Changes in river flow and its effect on agriculture and protection of fish species. Salmon and other coldwater species will experience additional stresses as a result of rising water temperatures and declining summer stream flows.
- Sea level changes resulting in coastal erosion and loss of land and its impacts on Bellingham's and surrounding communities' municipalities (water, storm drainage and sewage systems).
- Forest ecology in relation to drought stress on tree growth, including studies on the increase of insect pests and wildfires.
- The effect of increased temperatures in the summer months on Lake Whatcom as our drinking water source, e.g. algal blooms.
- Changes in food production of local crops with heavier precipitation in the springtime and a longer dry season.
- Pollutant accumulation of mercury and other heavy metals in our water and soils.
- Ocean acidification effects on the Pacific Ocean and Columbia River ecology.

While climate change impacts are inevitable at the global level and while I am concerned on a global scale as to these impacts, I am certain that there will be local impacts from climate change due to your proposal and I feel it is essential to ask for these impacts to be studied and considered in the EIS.

Below are additional reasons as to why you must add climate change impacts into the EIS for this proposal. The first reason is that we have to ask the question of whether the applicable law allows for consideration of an effect that may occur outside the US (i.e. climate change). The clear answer: Yes it can. It's right on the applicable SEPA law:

[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. (Wash. Admin. Code sec. 197-11-060(4)(b))
Next: Can the impact of combustion emissions, including carbon dioxide emissions, be considered?

Again, Yes. The United States EPA has recognized the materials emitted from combustion, including Carbon Dioxide, as pollutants that threaten human health and the environment.
At play is the combination: Considering combustion emissions, including carbon dioxide, that occur overseas.
Since this project needs to use government resources rather than just private assets, it is in the public's interest to consider the impacts with regards to using at least three major government-controlled resources that are required for the project to go forward:

- The coal is mined from federal government land in Montana and Wyoming
- Large water withdrawals from the Columbia River are needed for dust control

Permits to mine coal from public lands have been granted on the basis that the coal will provide a stable domestic energy supply. The current practice of shipping coal from federal lands to British Columbia for export to Asia is in conflict with the justification for the coal leases, and a massive expansion of such export would also be.

Since the proposal is for private economic gain, not to serve the public, it seems that it is not allowable to gather land through eminent domain.

I believe the project is not consistent with certain federal or state laws or policies stated below, which need to be considered, followed and/or adhered to.

It is essential to consider that The United States is a signatory to the Copenhagen climate accord, which agrees in concept to large reductions in GHG emissions worldwide. Large new coal export facilities are clearly inconsistent with the intent of the document we, the government of the United States, have signed.

Also, the US EPA has declared carbon dioxide to be a pollutant, and has started to regulate CO2 emissions. 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 export terminal for the 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. The US simply cannot outsource the CO2 for consumption elsewhere without considering this. That seems unethical, to put it simply.

The EPA has also commented on a different coal export proposal that resulting CO2 emissions should be considered.

Also, you must consider that Washington State adopted greenhouse gas reduction standards via legislation adopted in 2008. See RCW 70.235.070(1)(a). 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. This project and other proposed coal ports undermines the standards set by this state and it seems evident they must be adhered to. The proposal would wipe out 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.

Another consideration, in November of 2012, the Governor of Washington State released an executive order initiating action on ocean acidification. The executive order states, in part:

> I, Christine O. Gregoire, Governor of the state of Washington … do, effective immediately, hereby order and direct: … 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.

It seems evident that this must be adhered to if it is a mandate from the state.

Lastly, the SEPA standard itself recognizes the world-wide scope of environmental issues, therefore climate change must be included in the scope.

> SEPA considers "each person's" right to a "healthful environment" to be "fundamental and inalienable," (Rev.Code Wash. Sec. 43.21C.020(3).) "[r]ecognize[s] the worldwide and long-range character of environmental problems," and directs agencies, "where consistent with state policy, [to] lend appropriate support to initiatives, resolutions, and programs designed to maximize international cooperation in anticipating and preventing a decline in the quality of the world environment…." (RCW 43.21C.030(1)(f).)

Being that so many people have commented either online or at public hearings regarding their concerns about the impacts of climate change, it is imperative that climate change be added to the EIS. It is in the public interest. This proposal is an unprecedented project requiring unprecedented action and scrutiny. We are all humans living on a finite planet, and it is up to us to determine the allowance of destruction to the earth for profit and economic returns. It is a time like this that requires a moral compass from the permitting agencies, to land on the right side of history. This is a time we must transition away from fossil fuels to a clean energy economy. This is a time for the EIS to also include the cumulative impacts of all the proposed coal export terminals in the Pacific Northwest. This is a time for the EIS of this proposal to include the no action alternative.

References

http://library.globalchange.gov/2009-global-climate-change-impacts-in-the-united-states
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