

My name is Brandon Houskeeper.

I am the Government Affairs Director for Environmental Policy at the Association of Washington Business. AWB is the oldest and largest statewide business association. We are recognized as the state's chamber of commerce, as well as the state's manufacturing association. We represent more than more than 8,100 members companies and 700,000 jobs in Washington.

I am speaking today to urge Ecology and Cowlitz County to adopt the same standard of environmental review that has consistently been used for other projects in Washington. The agencies should not require the study of cumulative impacts on greenhouse gas emissions associated with the transport or use of a bulk commodity, in this case coal, for use outside of our state.

Washington State's economy is built on trade. Manufacturers and agricultural producers depend on access to overseas markets for their products. Even within the last few years, port and terminal projects have been proposed for the handling of grain, shipping containers, minerals, and crude oil. State and local permitting agencies have never imposed a requirement to study the greenhouse gas emissions associated with the transport or use of these products in distant markets.

The only exception to this standard was the recent scoping decision by the state for another coal export project.

That decision will set a dangerous precedent, which in fact, is already being used as the basis to challenge other projects.

The calculation of greenhouse gas emissions associated with the transport and use of a product, including coal, is subject to a host of variables: different transport routes, final destinations, uses of a product, and

regulations-including varying environmental regulations in different jurisdictions.

In addition to the challenges of completing a global greenhouse gas analysis, there will be substantial costs associated with this effort, costs that many future project applicants may be unwilling or unable to afford.

Ecology and Cowlitz County have an opportunity to correct a recent mistake. The agencies should return to the traditional scope of review for transportation projects similar to Millennium. Ecology and Cowlitz County should not require a far-reaching and speculative review of greenhouse gas emissions associated with the transportation and use of a product far beyond the borders of the state.

The purpose of a scope review is to ensure consideration of significant adverse environmental impacts, and to mitigate where feasible. Expanding the scope of review beyond existing standards puts at risk many benefits projects like this bring, such as environmental remediation and enhanced protection.

Unless this mistake is corrected, AWB believes it will have a chilling effect on future projects and the jobs they support.

As an Association, representing the broader business community, we look forward to working with you to ensure that this project, as well as all other projects proposed in Washington, meets the high standards of review already existing today.

Thank you.