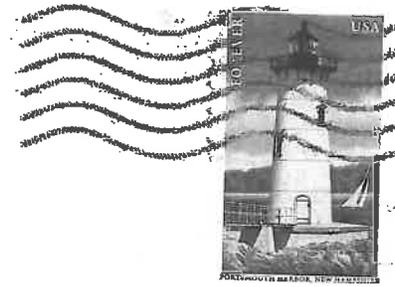




San Juan County Council  
350 Court Street, No. 1  
Friday Harbor, WA 98250

SEATTLE WA 980

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

98104175425





# San Juan County Council

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98250  
(360) 378 - 2898

District 1, Bob Jarman  
District 2, Rick Hughes  
District 3, Jamie Stephens

November 18, 2013

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

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Diane Butorac  
Regional Planner  
Department of Ecology, Southwest Regional Office  
P.O. Box 47775  
Olympia, WA 98504-7775

RE: Comments on Scope of EIS for Proposed Millennium Bulk Terminals Longview LLC  
Coal Export Terminal: Docket number 2013-19738

Dear ICF International, Ms. Guy, Dr. Placido, and Ms. Butorac:

The following comments identify significant adverse impacts to San Juan County that would occur if the proposed Millennium Bulk Terminals Longview LLC Coal Export Terminal project is approved.

San Juan County's economy is inextricably connected to the beauty of its environment and the health of its ecosystems. Many islanders depend upon a healthy and sustainable salmon fishery and Orca population. Jobs are directly tied to commercial and recreational fishing and shellfish farming. The tourist industry is the engine that runs our economy. People come to the San Juan Islands from all over the world to enjoy the beautiful environment and to see birds and sea life

Southern Resident Killer Whales, also known as Orca whales, are San Juan County's icon. These charismatic marine mammals are loved by our residents and are a major tourist attraction and

economic driver for San Juan County. The Southern Resident Killer (Orca) Whale was listed as endangered in 2005. Since then the National Oceanic and Atmospheric Administration (NOAA) has funded studies of Southern Resident Killer (Orca) Whales to better understand how they can be protected. A key part of this effort is defining Critical Habitat areas that are essential for their traveling, foraging, resting, and reproduction.

It is well-established that Southern Resident Killer (Orca) Whales spend much of the summer near the San Juan and Canadian Gulf Islands, but winter sightings had been rare until a recent NOAA-funded project tracked the winter travels of the Southern Resident Killer (Orca) Whale K pod along the outer coast from Northern California to the Strait of San Juan de Fuca.<sup>1</sup> K pod spent the most time between December 29, 2012 and February 22, 2013 outside the mouth of the Columbia River and along the coast to the north and south of the mouth of the river. They are presumed to have been feasting on upper Columbia and Snake River Chinook salmon that were transiting these waters at the time. The Chinook salmon is the preferred food of the Southern Resident Killer (Orca) Whales and their birth rates are strongly correlated with the abundance of Chinook salmon. (The following link shows a map of K Pod's travels: <http://www.youtube.com/watch?v=8ApK0SYothA>)

The proposed Millennium Bulk Terminals Longview LLC Coal Export Terminal's EIS should address the adverse impacts to Chinook salmon. What would be the adverse impacts to Chinook salmon from the construction and the on-going operation of the proposed Millennium Bulk Terminals Longview LLC Coal Export Terminal and associated rail lines, docks, shiploaders, stockpile pads, conveyors and equipment? What would be the adverse impacts to Chinook salmon from the on-going adverse impacts to water quality from stormwater runoff?

What would be the cumulative adverse impacts to Chinook salmon from all the proposed fossil fuel terminal proposals within the Columbia River? What would be the cumulative adverse impacts to Chinook salmon from the increased vessel traffic associated with the Millennium Bulk Terminals Longview LLC Coal Export Terminal and all other proposed fossil fuel terminal projects in the Columbia River? What would be the cumulative adverse impacts to Chinook salmon from the increased risks of an oil spill especially given the treacherous conditions that can exist at the Columbia River Bar which is also known as the "Graveyard of the Pacific."

What would be the cumulative adverse impacts from multiple smaller fuel spills over time to Chinook salmon? What would be the cumulative adverse impacts from multiple moderately-sized fuel spills over time to Chinook salmon? What would be the adverse impacts to Chinook salmon from a single catastrophic fuel spill? What would be the adverse impacts to Chinook salmon smolts during migration from oil spills of all sizes and in particular from heavy (also referred to as "persistent" - <http://www.smithsonianmag.com/science-nature/Running-the-Bar.html>)?

Executive Order 12-07, Washington's Response to Ocean Acidification, includes implementation of the recommendations of Governor Gregoire's Blue Ribbon Panel on Ocean Acidification; the number one recommendation is reduce emissions of carbon dioxide. The proposed Millennium Bulk Terminals Longview LLC Coal Export Terminal presents a direct contradiction to Executive Order 12-07, Washington's Response to Ocean Acidification.

The proposed Millennium Bulk Terminals Longview LLC Coal Export Terminal's EIS should address ocean acidification's risk to San Juan County's marine species and ecosystems. The burning of coal releases carbon dioxide into our oceans and contributes to ocean acidification. Based on the tonnage of coal proposed to be exported and subsequently burned, what would be the impacts of increased ocean acidification in the waters of San Juan County? What would be the costs of the

increased ocean acidification's impacts on recreational and commercial shellfish? What would be the impacts to the spawning of shellfish for recreational and commercial harvest? What would be the impacts to the wildlife that feed on shellfish? What would be the impacts to the pteropods that comprise much of the diet of juvenile salmon? What would be the costs associated with the increased ocean acidification? Chinook salmon are the preferred diet of the Endangered Southern Resident Killer (Orca) Whales. As their food supply declines, SRKW numbers will inevitably decline as well. What would be the economic costs to San Juan County from the adverse impacts of ocean acidification to Southern Resident Killer (Orca) Whales?

The burning of coal releases carbon dioxide that contributes to global Climate Change. Based on the tonnage of coal proposed to be exported and subsequently burned, what would be the impacts of the acceleration of Climate Change to San Juan County? What would be the costs from associated increased storm winds, ocean surges, and precipitation? What would be the impacts due to sea level rise? What would be the costs associated with sea level rise? What would be the costs associated with more intense storms coinciding with the highest "King Tides?"

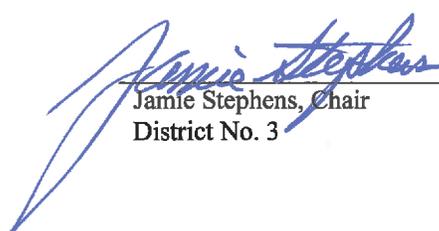
The burning of coal releases mercury. Based on the tonnage of coal proposed to be exported and subsequently burned, what amount of mercury will be released and what amount of that mercury will increase the mercury content of San Juan County seafood and the people and wildlife that feed upon that seafood? Prevailing winds send mercury that is burned in Asia back towards the U. S. Pacific Northwest. What would be the impacts of the increased mercury pollution? How would the increased mercury pollution impact fish consumption rates? What would be the costs associated with the increased mercury pollution? What would be the impacts on the health and reproduction of the Southern Resident Killer (Orca) Whales?

We look forward to the draft EIS that addresses all of our comments with in-depth analysis and with reasonable alternatives identified, including the no build option. Should the project be permitted, all feasible mitigation measures should be required to be implemented. Thank you for this opportunity to comment on the scope of the EIS for the proposed Millennium Bulk Terminals Longview LLC Coal Export Terminal and to secure the San Juan County Council's standing in the EIS process.

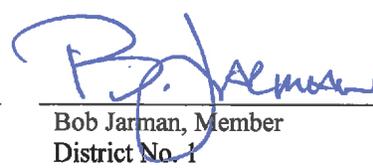
Sincerely,

**COUNTY COUNCIL  
SAN JUAN COUNTY, WASHINGTON**

**OPPOSED**

  
\_\_\_\_\_  
Jamie Stephens, Chair  
District No. 3

\_\_\_\_\_  
Rick Hughes, Vice Chair  
District No. 2

  
\_\_\_\_\_  
Bob Jarman, Member  
District No. 1

cc: The Honorable Maria Cantwell, US Senator  
The Honorable Patty Murray, US Senator  
The Honorable Rick Larsen, US Representative  
The Honorable Jay Inslee, Governor of the State of Washington

The Honorable Kevin Ranker, Washington State Senator  
The Honorable Jeff Morris, Washington State Representative  
The Honorable Kristine Lytton, Washington State Representative  
The Honorable Billy Frank, Chairman, Northwest Indian Fisheries Commission  
The Honorable Cliff Cultee, Chair, Lummi Nation  
The Honorable Melvin R. Sheldon, Jr., Chair, Tulalip Tribes  
The Honorable Brian Cladoosby, Chair, Swinomish Indian Tribal Community  
The Honorable Micah McCarty, Chairman, Makah Tribe  
The Honorable W. Ron Allen, Chair, Jamestown S'Klallam Tribe  
The Honorable Frances Charles, Chair, Lower Elwha Klallam Tribe  
The Honorable Robert (Bob) Kelly, Chairman, Nooksack Tribe Page 5 of 5  
The Honorable Jeromy Sullivan, Chair, Port Gamble S'Klallam Tribe  
The Honorable Leonard Forsman, Chair, Suquamish Tribe