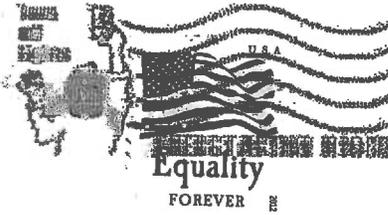


Eastside Audubon
your connection to nature

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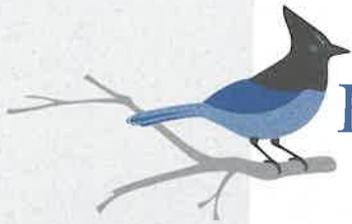
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Millennium Bulk Terminals - Longview EIS
c/o ICF International
710 Second Avenue
Suite 850
Seattle, WA 98104

98104180850





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birding
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October 27, 2013

Millennium Bulk Terminals - Longview EIS
c/o ICF International
710 Second Ave.
Suite 650
Seattle, WA 98104

Subject: Proposed Millenium Bulk Terminal Project--Scoping Comments

Dear Washington Department of Ecology, U.S. Army Corps of Engineers, and Cowlitz County:

We are writing to express the Eastside Audubon Society's scoping comments for the Millenium Bulk Terminal EIS. Our concerns extend to many aspects of mining and exporting Powder River Basin coal, but as scoping comments are not just votes for or against a project proposal, our letter enumerates particular EIS subject areas that we will scrutinize most carefully.

Eastside Audubon is a chapter of the national organization, with more than 350 local members. Our specific area of concern is northeast King County, generally north of I-90. Although the Port of Longview is well outside our geographic emphasis area, the Millenium proposal will have environmental impacts well beyond its project vicinity. We also want to express our support for local Audubon chapters and others along the entire route from the Powder River Basin to the proposed point of coal shipment. Many of them have raised valid concerns about the project's local and global impacts.

Our comments apparently will primarily affect the scope of the Department of Ecology's EIS, as we understand the Corps of Engineers' document will only consider direct environmental impacts at and near the (Longview) project site, ignoring cumulative or indirect effects of the proposal such as combustion of the coal in Asia. We deplore the COE's narrow scope, and are surprised they apparently have the unchecked authority to interpret the NEPA law that way. By contrast, we applaud the State of Washington's Department of Ecology for taking a broader approach.

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The shipment of 41 million tons of coal per year to Asian destinations via the proposed Millenium Bulk Terminal will not in itself take the planet past the "tipping point" of climate change disaster. But, if approved, it would set a precedent for approval of other Powder River coal export proposals such as Gateway Pacific near Bellingham. Even those two terminals together at about 100 million tons/year would be a small fraction of the worldwide total of fossil fuel contributions to CO2 emissions. But together with a host of other coal, oil and gas production and transport proposals in the pipeline, they would have enormous impacts. And above all, we expect at least the Washington Department of Ecology's EIS to document those cumulative impacts on the environment, not just the smaller incremental ones of the Millenium terminal.

The particular EIS subject areas we will focus on include the following:

Birds and Wildlife: It goes without saying that a local Audubon chapter would have intense interest in the effect of a large energy project on bird habitat. This goes beyond our interest in birds as a single issue. Our interest is in the continued survivability of birds as our western lands are developed, industrialized, urbanized and altered in many ways by human activities. We are specifically concerned about apparent trends of decline in some bird species in Washington and other western states that may indicate wider threats to human health. We believe responsible government agencies like yours should assure that the Millenium Bulk Terminal incorporates all possible measures to protect the interdependent web of life that birds and fish so plainly represent.

National Audubon and others are beginning to document the ranges of birds and migratory patterns that appear to relate to climate trends. So far the evidence based on citizen science may be anecdotal, but seems to be advancing rapidly in scientific validity. Our statewide organization has recently discussed linkages between avian and aquatic species, namely the connection of birds to forage fish. Clearly many sea birds and shorebirds depend on the

health and continuity of these food sources. So we would expect the forthcoming Draft EIS to document the coal mining and transport projects' effects on birds, fish and other aquatic and marine life. It should do so all the way from the Powder River Basin to the Pacific Ocean and beyond, since the project will have global effects. We are sure that local and state chapters of Audubon as well as National will be eager to supply you with data and maps to support the EIS.

Wetlands: Much has been written about the amount of coal dust lost by trainloads of coal between mining sources and destinations, with many different estimates depending on assumed conditions. One commonly-heard estimate ranges between 500 to 2000 pounds per trainload, but others are much higher. The EIS must establish a credible figure, because many impacts depend upon it. And this impact clearly involves more than just dust blowing from moving trains. In particular when coal cars are parked in sidings or otherwise stationary, they also shed coal byproducts when it rains. It rains a lot in Longview and all along the train route west of the mountains. Obviously the runoff poses a threat to downstream waterbodies including the Columbia River and the Pacific Ocean. Regional maps from Montana to Longview show an estimated 15,000 acres of water bodies that could potentially be exposed to the coal cars' effluent, potentially including toxic materials such as mercury, arsenic, lead and cadmium. Mercury in particular, even in miniscule quantities, has been shown to have devastating effects on salmon. We would expect the Draft EIS to address these implications for the proposed project.

Reasonable Range of Alternatives: Although the responsible agencies may be pressured to downplay this part of the EIS because proponents are in the business of mining and transporting the product to market, alternatives must be diligently studied and reported. In our view, the alternatives should include not just technological fixes to specific problems, but also a serious consideration of the "No Action" alternative. The Powder River Basin's coal resources are largely in public control, so leases to mine and export them are part of the supply chain to Longview and other Pacific ports that must be seriously considered. If separate environmental documents are in

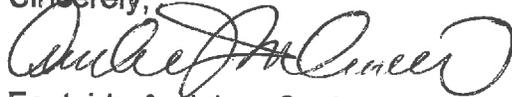
the works to cover the environmental impacts of leasing the coal on public lands and mining it, the documents must be clearly cross-referenced so citizens and the ultimate decision makers understand the implications..

Measures to avoid, minimize or mitigate adverse environmental impacts: It is clear that the emergence of alternative energy sources and the high environmental costs of coal combustion have already eclipsed the U.S. appetite for Powder River coal. It has been widely argued that the U.S. should not deny emerging Asian economies the use of publicly-owned coal resources we have in ample supply. But if that argument is offered, the EIS must also document the climate effects of either supplying or restricting that coal—an informed estimate of the effect on foreign nations' willingness or unwillingness to switch to greener energy sources.

Access to millions of tons of cheap Powder River coal would allow overseas users to delay their efforts to convert to alternative energy sources. The resulting effect on CO2 emissions can be estimated to a meaningful degree. Conversely, a U.S. decision to restrict or negate that 100 million+ ton/year supply—"leaving the coal in the ground"—must be considered as a way to avoid, minimize or mitigate the coal combustion impacts. It is an option that should be presented to the politically-accountable decision makers.

Thank you for the opportunity to comment.

Sincerely,



Eastside Audubon Society
Andy McCormick, President



Peter Marshall
Conservation Committee Chair